



NCCHSP179

Nottingham City Council Housing Services

Regulator of Social Housing's Competence & Conduct Standard: Policy Statement

Document title:	NCCHSP179 - Regulator of Social Housing's Competence & Conduct Standard: Policy Statement	
Issue date:	21/10/2026	
Version:	1	
Document status:	Final	
Effective from date:	21/10/2026	
Date to be reviewed:	21/10/2028	
Scope of document:	Guidance for employees on the Regulator of Social Housing's Competence & Conduct Standard	
Applicable to:	All Housing Services Teams	
Author / reviewer:	Name:	Graham De Max/ Dan Lucas
	Job title:	Housing Policy & Research Officer/Housing Strategy & Partnerships Manager
	Section:	Development, Housing Services
Verifier:	Name:	Mark Lowe
	Job Title:	Assistant Director (Strategy)
	Section:	Development, Housing Services
Teams affected:	All Housing Services Teams	

NOTTINGHAM CITY COUNCIL HOUSING SERVICES

REGULATOR OF SOCIAL HOUSING'S COMPETENCE AND CONDUCT STANDARD: POLICY STATEMENT

Note: the process of compliance with the professional qualification requirements of the Competence and Conduct Standard which will apply to relevant Housing Services staff is covered in a separate document.

1 SUMMARY

This is a statement of how Nottingham City Council's social landlord function (Nottingham City Council Housing Services, NCCHS) will fully comply with the policy requirements of the Regulator's Competence and Conduct Standard (C&CS), which comes into force in October 2026.

The purpose of the C&CS is to ensure that the staff who deliver a social landlord's housing management services are suitably skilled, experienced and knowledgeable to carry out their duties. Equally important, it aims to bring about a culture change in the way that residents of social housing are treated by staff, embedding an ethos of respect, listening, responsiveness, and integrity in the relationship.

2 BACKGROUND

The C&CS has its roots in the Grenfell Tower tragedy. In the aftermath of the disaster, discussions with social housing tenants nationally revealed that they felt that housing staff often did not show respect towards them and failed to listen to their concerns. The eventual outcome was a strengthened Regulator and a revised set of Consumer Standards. Amongst these was the Transparency, Influence, and Accountability (TIA) Standard which ensures that tenants are fully involved in decisions about their homes and are provided with standardised performance information about their landlord's service.

A further issue was a perceived lack of professionalism in the social housing sector, leading to a review of how professional standards in the sector could be raised. The upshot of the review was that it will be mandatory for senior managers and senior executives ("Relevant Individuals"¹) to hold or be enrolled and working towards a Level Four or Level Five qualification.

¹ "Relevant individuals" are as follows:

- **Frontline and Operational Staff:** Anyone handling day-to-day tenancy management, lettings, income collection, anti-social behaviour (ASB), complaints, or customer service.
- **Technical and Asset Staff:** Staff dealing with repairs, maintenance, building safety, and major capital works.
- **Senior Housing Managers:** Staff who spend the majority of their time managing direct service delivery to tenants.

Generally, providers of social housing will be required 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.

In order to deliver this, the Regulator will require that social housing providers:

- *have a written policy setting out their approach to a number of things such as learning and development, appraising staff, and managing poor performance;*
- *show the appropriate steps they will take to secure that those of their services providers' staff who are relevant individuals have the necessary skills, knowledge and experience and exhibit the behaviours needed for the relevant services provided by those individuals, under or pursuant to the relevant management services agreement, to be of a good quality;*
- *adopt or develop an appropriate code of conduct for those of their staff who are relevant individuals (essentially those delivering front-line services) and to ensure this is embedded within their organisation; and*
- *give tenants meaningful opportunities to influence and scrutinise the development of the policy, and decisions relating to the code of conduct, and ensure they are made accessible to tenants and kept up to date and fit for purpose*

This document sets out how NCCHS will comply with these requirements.

An overarching theme in the document is the interaction with existing Council policies. NCCHS is only one service amongst many delivered by the City Council: many of the requirements of the C&CS are covered to a significant extent by existing corporate policies, so there is no need for NCCHS to develop additional documents. These policies and other relevant corporate processes and practices are shown in summary in the table in section 5.

NB A significant number of employees who deliver a direct service to residents, most notably staff in the Customer Contact Centre come under the control of managers who are not employed within Housing Services. The C&CS will apply to all such employees, and therefore responsibilities related to compliance with the C&CS cross NCC departmental boundaries.

3. THE ROLE OF NCCHS SERVICE STANDARDS

How NCCHS will comply with the specific requirements of the C&CS is set out below. In broad terms however, the principles of the standard are articulated via the division's Service Standards which have been developed for each of the key services of the Council's landlord function. These are all available [here](#).

The service standards embody the principles of customer care, professionalism, transparency, and responsiveness to resident feedback. All of the service standards

-
- **Senior Housing Executives:** Directors and heads of service who provide strategic direction and carry accountability for housing services.
 - **Contractors and Agents:** Workers employed by external service providers who perform housing management functions on behalf of a registered provider.

have either been consulted upon or are currently being consulted upon in order to achieve a benchmark of resident expectations. In this way the NCCHS service standards underpin and exemplify the ethos of the C&CS. There are however some Service Standards which are wholly prescribed and therefore cannot be influenced by residents.

4. SPECIFIC POLICY APPROACH

4 i. LEARNING AND DEVELOPMENT

The City Council has a corporate Learning and Development (L&D) policy. The policy states that learning and development needs will be discussed and planned as part of its Individual Performance Review (IPR) process. In summary, the process comprises a review of a member of staff's previous year's objectives, the setting of objectives for the forthcoming year (which will include learning and development needs) and a mid-year review. Regular check-ins ("one to ones") are also part of the process. Although NCCHS must use the corporate IPR process, the service will integrate into its IPR meetings checks and reviews of how Relevant Individuals are progressing towards, or maintaining the specific qualification requirements of the C&CS. In this way, NCCHS will stay fully abreast at all times of how all of its Relevant Individuals, and as a result, the service, is complying.

The Council's L&D policy is alive to the fact that certain roles within its services require a formal qualification. From October 2026, this will apply to housing staff who are Relevant Individuals. The policy states:

The council will plan its development activities in line with industry standards, maintain relations with sector skills councils and keep up to date with national and regional training and development initiatives.

The principles applied to other services in the authority which require staff to hold a valid qualification will be introduced into NCCHS with the support of corporate Organisational Development (OD) officers. There is an existing Council policy applying to staff who are required to be registered as a member of a professional body to fulfil their duties. Although there is no requirement in the C&CS for Relevant Individuals to be members of a professional organisation, the principles within the policy can be applied to staff being required to have a qualification, ie what the process is if an individual fails or refuses to obtain a qualification or keep it up to date. Again, this process will be supported by the Council's OD service.

The learning and development aspects of the C&CS are not limited to the requirements for certain staff to hold qualifications. The requirement to embed the Code of Conduct (see below) will also be integrated into the IPR process for NCCHS staff. Any learning needs in terms of required behaviours, customer interaction and service delivery will be identified to ensure the principles of the C&CS are fully understood.

The Council delivers both in-house and external training and learning via its Learning Zone. Each member of staff has a personal training record, through which gaps in their learning can be identified and relevant training (either online or in person) can be undertaken. The Learning Zone can support Council-wide or department-wide training initiatives, such as data protection and information security. It was, for example, able to facilitate the compulsory training for all housing staff on the provisions of Awaab's Law.

4 ii. STAFF APPRAISAL

The Council's Individual Performance Review process is referred to above. It is wholly fit for purpose in order to ensure that the performance of housing staff is regularly appraised.

The IPR process seeks to embed specific behaviours which are expected of NCC staff, and these are grouped by Individual, Manager and Senior Leader. All contain behaviours which relate in some way to behaviours which support the C&CS:

Individual:

- *Focus on the purpose of your work and how it benefits citizens and service users.*
- *Treat people fairly and with respect, taking account of others' needs, background or barriers.*
- *Deliver our services with all characteristics and communities in mind.*

Manager:

- *Set clear goals for your team or service and show how they benefit citizens and service users.*
- *Lead by example by being accessible, approachable and listening well, upholding our behaviour standards and supporting your team to deliver and adapt.*
- *Lead service change with purpose, making sure it reflects citizen needs*

Senior Leader:

- *Set and communicate a clear directorate/service vision that connects strategy to delivery and shows how the organisation creates value for citizens.*
- *Design services around the diverse needs of citizens using data, feedback and lived experience to improve accessibility and impact.*
- *Lead a culture that actively listens and adapts to individual circumstances.*

Through the embedding of these behaviours throughout its workforce, NCCHS can amply demonstrate that its appraisal process meets the needs of the C&CS. However, specific behaviours which form part of the C&CS such as respecting residents and their homes, listening to their concerns and acting upon them will, as also mentioned above, be integrated into housing staff IPRs.

The Council monitors the delivery of the IPR process, so there should be no housing staff who are not receiving appraisals.

4 iii. MANAGING POOR PERFORMANCE

The Council's policy on tackling poor performance and associated procedures are fully fit for purpose in order to meet the requirements of the C&CS. Managing poor performance is an essential element of people management and all managers in Housing Services are equipped to address it, backed up by the robust guidance of the Council's policy and associated procedures.

5 SERVICE PROVIDERS

The C&CS requires landlords to ensure that organisations which deliver substantive services to NCCHS are suitably knowledgeable, experienced and competent, and exhibit the same behaviours that NCCHS is required to embed in the organisation. The key service providers here will be those delivering contracts as part of major capital works.

The competence and experience required to deliver services is assessed at the tender, evaluation and award stage. These expectations are shown in Appendix Two to this statement.

The conduct and behaviour expectations of contractors working on behalf of NCCHS are ensured by standard clauses in contracts to this effect. These expectations are also shown in Appendix Two. They are monitored throughout the delivery of contracts, and issues and complaints arising are dealt with in accordance with those clauses.

As of August 2026, NCCHS is reviewing its standard contractual documentation against the principles of the Competence and Conduct Standard to identify where existing provisions should be strengthened or made more explicit.

6 CODE OF CONDUCT

Nottingham City Council has a Code of Conduct for Employees which has been adopted as part of the Council's Constitution. It applies to all staff in the Council, including those employed within Housing Services. It cannot therefore be changed without going through a formal process and consultation; moreover, it cannot be amended to incorporate issues which apply to only one department of the Council.

The NCC Code of Conduct does however include a number of principles which align with the requirements of the C&CS. These are set out in the appendix attached.

7 SUMMARY OF EVIDENCE

The table below shows how specific Nottingham City Council policies, processes, and corporate practices support Housing Services in meeting the Competence and Conduct Standard:

Requirement	NCC evidence
Code of Conduct	• NCC Code of Conduct for Employees • NCCHS Service Standards
Staff have the relevant skills, knowledge and experience	• Job description and person specification • Recruitment Policy and processes • Induction process • Probationary Policy • Individual Performance Reviews • One to One meetings with manager • Learning and Development Policy • Training via the Learning Zone
Staff exhibit the right behaviours	• NCCHS Service Standards • Individual Performance Reviews • One to One meetings with manager • Behavioural Expectations • Equality, Diversity and Inclusion Policy • Code of Conduct for Employees • Whistle Blowing procedure
Dealing with poor performance	• One to One meetings with manager • Performance Management Policy and processes
The approach to learning and development of staff	• Learning and Development Policy • Learning Zone
Service providers' compliance	• Tendering process and contract documentation

8 RESIDENT INFLUENCE IN THE DEVELOPMENT OF THIS POLICY STATEMENT

As noted above, NCCHS believes that its suite of service standards enshrines the principles of the C&CS. All service standards have either been consulted upon with

residents or are in the process of being consulted upon. In many cases residents were able to make suggestions for the standards.

Additionally, this policy statement has been submitted for consideration to the Housing Assurance Board (HAB). The HAB is a high-level body comprising of residents at which there is an opportunity to scrutinise and make comment in the presence of senior Housing Services managers upon major policy decisions on council housing being proposed by the Council.

9 REVIEW AND ACCESSIBILITY

This policy statement will be kept under regular review to ensure that it is still meeting the requirements of the C&CS and responds to changes in legislation and regulation. It will be made accessible to all residents by being placed on the Housing Services webpages and produced in accessible formats.

10 OUTCOMES FOR RESIDENTS

As with the Regulator's other Consumer Standards, the effectiveness of NCCHS in meeting the Competence and Conduct Standard will be measured by outturn in the Regulator's mandatory Tenant Satisfaction Measures (TSMs). In terms of staff conduct and behaviours the key TSMs are:

- Agreement that the landlord treats tenants fairly and with respect
- Satisfaction that the landlord listens to tenant views and acts upon them
- Satisfaction that the landlord keeps tenants informed about things that matter to them

The "competence" element of the C&CS clearly applies across all of the remaining Tenant Satisfaction Measures which demonstrate levels of resident satisfaction with the delivery of the landlord service.

Performance will also be captured by regular feedback from residents as part of NCCHS's comprehensive [Resident Influence Strategy](#).

APPENDIX ONE

The NCC Employee Code of Conduct: alignment with the Competence and Conduct Standard and what it means for residents

It is not necessary for Housing Services to adopt a Code of Conduct separate from the Council. The following shows how the NCC Code of Conduct for Employees aligns with the Competence and Conduct Standard, and how specific elements of it will translate into positive outcomes for residents:

Para	Statement in NCC Code of Conduct for Employees	What this means for residents
1.1	All employees of the City Council are expected to give the highest possible standard of service to the public	• Residents are listened to • Staff are responsive to residents' requests • Staff invite and respond to feedback from residents • Services are delivered effectively, eg repairs carried out promptly and satisfactorily • Residents and their homes are treated with respect • Complaints are dealt with effectively
1.3	All employees will: • Have a duty to treat other people with respect; • Be sensitive to other people's different needs, attitudes and lifestyles; • Oppose all forms of discrimination	• Residents are treated with respect • Appointments are always offered to suit residents' needs • Services as far as practical meet individual needs • Residents are treated fairly
1.4	Our 'Behavioural Expectations' of everyone working for the Council are that we: • Lead people • Be inclusive • Change and innovate • Collaborate	• A service which is responsive to changing needs and expectations • Residents have the ability to influence decisions • Residents are involved, eg supporting reviews of services, carrying out scrutiny of performance
1.10	The Council's employees should maintain the Council's standards as set out in this document. All employees	• A professional approach by all staff

	should participate in an Individual Performance Review process.	Staff development, leading to more highly skilled and experienced staff and ultimately better outcomes for residents
7.1	The public and the Council expect high standards of conduct from our employees who are expected to behave with honesty and integrity, to comply with policies, procedures and rules and ensure that they behave within the law	- Staff serve residents showing honesty and integrity - Staff follow procedures, leading to high quality services and fair outcomes for residents
13.2	Employees should remember their responsibilities to the community they service and ensure courteous, efficient and impartial service delivery to all groups and individuals within that community	Staff take an interest and show a commitment to the communities they serve, eg helping to create safe, clean and attractive environments
17.1	All members of the community, customers and employees have a right to be treated fairly, with dignity and respect. All employees should comply with Council policies relating to equality issues, in addition to the requirements of the law.	- Residents are treated fairly irrespective of their background and circumstances - Residents are not discriminated against on the basis of their personal characteristics
17.2	All employees are appointed and expected to comply with the Equality Act 2010 and should not discriminate against others with a protected characteristic. You will also be expected to carry out any mandatory training on equality and diversity matters as may be instructed by your manager from time to time and once completed, will be expected to comply with all the Council's EDI principles.	As above
25.1	Employees must treat all information that they come across during their work as confidential and ensure that they comply with the Data Protection Act and the General Data Protection Regulations	Residents' personal data is kept secure and their circumstances are kept confidential at all times

APPENDIX TWO

CONTRACTUAL ARRANGEMENTS SUPPORTING THE COMPETENCE AND CONDUCT STANDARD

Social housing providers must ensure that “service providers”, i.e. contractors who have a substantive role² in delivering services on their behalf also meet the Competence and Conduct Standard (“C&CS”). The main NCCHS function this will apply to is capital works within the Housing Revenue Account asset management programme. NCCHS’s repairs service is currently delivered in-house; however, the same principles are applied

In terms of the “competence” element of the Competence and Conduct Standard, NCC’s existing standard contractual documentation contains a number of provisions requiring contractors and their personnel to demonstrate appropriate competence, qualifications and standards of conduct. These requirements align with a number of the principles arising from Dame Judith Hackitt’s review of building safety and the subsequent Building Safety Act 2022, including:

- Demonstrable competence
- Building safety knowledge
- Accurate record keeping
- Quality assurance and right first-time delivery
- Resident engagement skills
- Safety culture and reporting
- Management and leadership competence

A number of the conduct and behavioural requirements relevant to the C&CS are already reflected within NCC’s Generic Works Information document issued at tender stage for schemes within the Asset Management Programme. This includes the following provisions applying to personnel working on or in residents’ homes:

- **Section 6.1 – Site Rules** requires all site personnel to have the relevant level of competence and requires building occupiers and members of the public to be treated with courtesy and respect at all times.
- **Section 6.2** allows the Council to remove individuals from working at properties where the Site Rules are not complied with and, following repeated instances, ban them from Council premises.

² “Contractors and Third-Party Service providers come within the scope of the standard where they have a substantive role in managing the delivery of housing management services. This includes technical housing management functions (defined as part of the Government’s Policy statement as “estate management; capital / major works within occupied buildings; asset management (including building and/or fire safety management); and repairs and maintenance”). Chartered Institute of Housing, Competence and Conduct regulatory requirements in practice, webinar Aug 5th 2026

- **Section 7.12 – Code of Conduct** allows the Council to require the removal/replacement of supplier personnel responsible for misconduct, incompetence or negligence.
- **Section 7.42** requires suppliers to take reasonable steps to ensure their employees, agents and subcontractors comply with the Site Rules and Code of Conduct.
- **Section 11 – Occupied Premises** requires suppliers to take reasonable care of occupied properties and minimise inconvenience to occupants.