



Competence and Conduct Policy

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Introduction

Empower Housing Association (EHA) are committed to providing high-quality services and putting tenant's needs at the heart of everything we do.

EHA specialises in providing homes across England for adults with disabilities, and being experts in this field allows us to focus on empowering our tenants to live as independently as possible. Our purpose is to provide specialised housing solutions that allow people to live independently enabling their ability to thrive.

EHA has adopted the revised National Housing Federation's (NHF) Code of Conduct 2026 ("the Code") which sets out the appropriate standards for housing associations. EHA annually undertakes a self-assessment and provides evidence in respect of ongoing compliance with the Code.

The aims of the policy and the adopted NHF code of conduct are to ensure that all relevant colleagues have the required skills, knowledge and experience, and display the right behaviours, to deliver high-quality services for our tenants. In doing this we will ensure that we comply with the Competence and Conduct Standard set out by the Regulator of Social Housing (RSH).

Scope of the Policy

This policy is relevant to all EHA tenants in respect of professionalism, knowledge, skills and qualifications expected of colleagues delivering the services they receive.

The policy applies to all colleagues delivering services to EHA tenants. There are relevant roles where specific qualifications are required within specific timescales however all colleagues through EHA's learning and development framework will be expected to identify relevant training and personal development in respect of their roles and the delivery of services to tenants.

The Policy

This Policy has been developed to support compliance with the Regulator of Social Housing's Competence and Conduct Standard – the contents of which are set out in *Direction on the Regulatory Standards (Competence and Conduct) 2025*¹. The qualifications requirements are described by the Government in *Competence and Conduct Standard: Policy Statement*².

Skills, Knowledge, Experience and Qualifications

EHA will ensure that all relevant colleagues;

- Have the appropriate skills, knowledge and experience to carry out their role effectively.
- Are supported to maintain their knowledge and skills through ongoing learning and development

Learning and Development

EHA will ensure:

¹ [Direction on the Regulatory Standards \(Competence and Conduct\) 2025 - GOV.UK](#)

² [Competence and Conduct Standard for social housing: consultation - GOV.UK](#)

- All colleagues have a regular assessment of their learning and development needs as part of their 1:1s and annual appraisals
- Colleagues have access to opportunities for training and development as appropriate including formal and informal training and continuous professional development
- Our approach to learning and development is tailored for colleagues across different roles and the specific requirements of those roles
- Tailoring requirements include colleagues undertaking top up modules where existing qualifications partially meet the requirements

Qualifications

EHA has specific qualification requirements for senior colleagues, which is a requirement of the RHS's Competence and Conduct Standard.

We will ensure that:

- senior managers and senior executives hold or are working towards a housing management qualification or training which meets the Regulator's requirements.
- We maintain records to evidence that such training and qualifications are held.

A transition period applies to the qualification requirements, which means EHA has until October 2030 for relevant colleagues to achieve or be working towards these qualification requirements. We will try use our judgement to prioritise and ensure the requirements are met sooner where we are able to.

Service Providers

Similar qualification requirements will apply to senior managers and senior executives working for some organisations we may work with if they manage housing management services for our tenants. These organisations are called "services providers" in the regulations.

In respect of these organisations, we will:

- Make sure that the terms of our agreement(s) with them require them to meet these requirements. This includes that they ensure their staff meet qualification requirements where relevant.
- Make sure that they know about the requirements and ensure they understand their obligations.
- Ensure our contract management and procurement arrangements are adapted to implement the requirements where appropriate.

A transition period also applies to these organisations.

Appraisals and Performance Management

EHA operates a regular cycle of supervision and annual appraisal. Appraisals include a discussion about a colleague's performance in the previous year, and their targets and goals for the upcoming year.

Regular appraisals will check up on the progress of those targets and goals, their competence and conduct, and an assessment of their training and learning and development needs. These are a chance for colleagues to raise any issues or concerns they have.

Our Capability Procedure and Policy describes how we address individuals' poor performance relating to competence or capability, whereas the Disciplinary Action and Dismissal Procedure sets out how instances of misconduct will be dealt with.

Code of Conduct

The competence and conduct standard requires the organisation to adopt a code of conduct for relevant colleagues, and to ensure that tenants are given meaningful opportunities to influence its adoption or development.

EHA has adopted the revised National Housing Federation's (NHF) Code of Conduct 2026 ("the Code"). Everybody who works for or represents EHA, including Board members, should be aware of the Code and comply with it.

The NHF Code covers five main areas:

1. **Acting in the best interests of residents and the housing association:** you have a responsibility to carry out your role in a way that supports the long-term interests of current and future residents and in line with the purposes and values of the housing association
2. **Behaving with integrity:** you must act honestly, transparently and in line with the highest standards of ethical conduct. The reputation and good name of the housing association depends on compliance with this code, and with the laws, policies and procedures that it refers to.
3. **Treating others fairly, with respect and empathy:** the way in which people behave towards each other is fundamentally important to the experience of residents and staff of the housing association. Respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture.
4. **Taking responsibility for the impact of your actions:** you have a responsibility while on the housing association's business to consider the immediate and longer-term impact of your actions and to be accountable for them.
5. **Acting with diligence and care:** the diligence and care with which roles are performed has a significant impact upon the quality of decision-making and services, and on the experience of residents and staff. This includes taking responsibility for your own performance and for meeting relevant professional standards.

Data Protection

Protecting Personal Data

Any personal data which is handled in respect of any application relating to this policy or any data breach will be managed in line with EHA's Data Protection Policy. Personal Data will be secured by appropriate technical and organisational measures against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

EHA will develop, implement and maintain safeguards, including cyber security measures and appropriate hardware security measures. Care will be taken when collecting and processing any Personal Data to avoid loss and unauthorised access, use or disclosure.

EHA will only transfer Personal Data to third-party service providers who agree to comply with the required policies and procedures and who agree to put adequate measures in place, as requested.

Responsibilities

EHA's Chief Executive Officer (CEO) has responsibility for the implementation and organisational compliance with this policy.

Related Legislation, Regulation and Codes of Practice

- NHF Code of Conduct 2026
- Social Housing (Regulation) Act 2023
- Regulator of Social Housing (RSH) Consumer Standards:
- Competence and Conduct Standard
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Equalities Act 2010

Related Policies, Procedures and Documents

- Learning and Development Policy
- Performance Management Framework (1:1s/appraisals)
- Capability Procedure and Policy
- Disciplinary Procedure
- Reasonable Adjustments Policy
- Equality, Diversity and Inclusion Policy
- Colleague Handbook
- Data Protection Policies

Reporting and Monitoring

Self-Assessment against the NHF Code of Conduct reported to Board annually

Annual Learning and Development reporting to Board including progress against implementation timescales for professional qualifications

Consultation and Publicising Policy

EHA has used a number of methods of consultation:

- Consultation has been undertaken through the Community Housing Partnership (CHP) involving tenants from a number of organisations
- EHA has also undertaken specific consultation with EHA tenants and their advocates
- EHA Managers have reviewed the policy and commented
- The policy will be published on EHA website and made available in alternative formats as required and requested

Review

The policy will be reviewed every three years or sooner if there is a change in regulation, legislation or codes of practice.

Equality Impact Assessment

An Equality Impact Assessment has been completed.