

Competence & Conduct Standard Policy

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Policy/Strategy Control Statement

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3	Service Lead	Nairn Davidson
4	Author	Kyla Mittal
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Policy Applicable To

Business Area: Regulatory Compliance [Business Area]
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Applicable to: Groupwide [Policy Applicable To]

Amendment Sheet Record

Revision Date	Description of Changes	Approved By	Date Approved

Please summarise the current policy requirements and how this is changed in the new policy.

There was previously no standalone PfP policy setting mandatory housing qualifications for colleagues performing specified senior housing management and executive functions. The new policy requires in-scope senior housing managers to hold or obtain a CIH Level 4 qualification, and senior housing executives to hold or obtain at least a CIH Level 5 qualification or foundation degree, normally within three years of becoming eligible. It also introduces arrangements for identifying in-scope roles, recognising existing qualifications, exemptions, reasonable adjustments, appeals, succession planning and mergers or acquisitions.

Please explain the reason for changes/improvements/new policy.

The new policy implements the Competence and Conduct Standard established under the Social Housing (Regulation) Act 2023 and provides a consistent approach to meeting its qualification requirements. Its purpose is to strengthen professionalism, ensure relevant colleagues have the necessary knowledge and skills, and support higher-quality services and relationships with customers. PfP will monitor the wider effect through Tenant Satisfaction Measures, complaints information and other customer survey data.

Please explain any new actions required to put the policy changes into practice.

In-scope colleagues must complete a skills scan, provide evidence of existing qualifications and, where required, enrol through PfP Thrive on the relevant CIH-

approved course. Business area heads must allocate colleagues to cohorts, while Training and Development will review the list of in-scope roles at least every six months and support appropriate adjustments or exemptions. Colleagues completing the qualification must also outline how they will apply and share their learning, with implementation recommended for inclusion in annual performance objectives.

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1.1 Background

The social housing sector plays a critical role in providing safe, secure, and well-managed homes for communities. To ensure high levels of professionalism and service delivery, it is essential that individuals working within housing management possess the necessary knowledge, skills, and qualifications. As part of the Social Housing (Regulation) Act 2023, The Competence and Conduct Standard (C&C) establishes a structured approach to professional development by setting clear qualification requirements for key roles. This policy outlines how Places for People (PfP) will implement these standards in England, ensuring that all relevant Colleagues are equipped to meet the expectations of the sector and deliver high-quality services to residents.

The aim of the Competence and Conduct Standard is to drive a sectoral culture shift which improves the relationship between PfP and our Customers. While there is no single metric that determines the ‘success’ of this relationship or causality of this policy, PfP is committed to ensuring the quality of our interactions with Customers improves and will take on regular reviews of such via Tenant Satisfaction Measures (TSMs), complaints data, and other Customer survey data. These trends will act as a soft estimate of the successful implementation of this policy.

This document should be read in tandem with our [People](#) and Customer Promises, which act as Places for People’s Code of Conduct. Having previously gone through consultation with Customers, the wording was intentionally chosen to reflect Places for People’s culture. All Colleagues must abide by these Promises.

2.1 Qualification Requirements

Senior housing managers and executives (including any other organisation affiliated with the PfP Group) responsible for housing management services must possess the appropriate qualifications in this field. In-scope colleagues will be contacted by a Learning and Development Business Partner to discuss next steps.

- Senior housing managers (SHMs), who manage the direct delivery of housing management services to tenants, need a CIH (Chartered Institute of Housing) Level 4 Certificate in Housing qualification.
- Senior housing executives (SHEs), who provide strategic direction and have accountability in relation to housing management services, must hold at least a CIH Level 5 Diploma in Housing qualification or a foundation degree.

Given the aims of the C&C, Colleagues that undergo training must ensure learnings and insights are shared with more junior staff. Thus, as part of completing the course, Colleagues will be asked to outline a plan by which they will implement the course material. It is also recommended that this implementation be included in annual performance objectives.

Qualification courses must be administered by a CIH-approved centre. For Colleagues, this will be PFP Thrive. Learn more about Level 4 requirements [here](#) and Level 5 requirements [here](#). In-scope Colleagues are required to complete the qualification within three years of becoming eligible.

Annex A shows the identified in-scope roles, although this is subject to change as the organisational structure of the business changes. **Annex B** shows the process by which these roles were identified.

2.2 Qualification timelines

The Level 4 course is expected to take 12 months and includes:

- Six face-to-face / online one-day workshops.
- Six assignments, including directed activities, such as data analysis, research, and reading.
- Access to additional self-led learning.

The Level 5 course is expected to take 12 months and includes:

- Seven face-to-face / online one-day workshops.
- Seven assignments, including directed activities, such as data analysis, research, and reading.
- Access to additional self-led learning.

Colleagues should expect to spend two days per month on the course. The exact length of study will be determined by prior knowledge/experience and learning style, although there is a minimum requirement of 120 hours of study. The first cohort began in July 2025, and delivery will be staggered across multiple locations. Colleagues will be informed of the learning start date and the location of face-to-face modules in advance. Business unit heads will allocate in-scope staff to cohorts to minimise disruptions to business operations. New Colleagues and those without a probation period will have 12 months to enrol in the relevant qualification course.

Colleagues with disabilities that make travel or accessing face-to-face sessions difficult or unreasonable can work with their line manager and PFP Thrive Colleagues to ensure appropriate arrangements can be made. This could include attending sessions only at certain locations convenient for them or requesting other adjustments that provide a conducive learning environment (see more on reasonable adjustments in section 4.2).

2.3 Existing qualifications

In-scope colleagues will be asked to complete a skills scan questionnaire, reflecting any prior qualifications received. Colleagues that have already completed the required (or equivalent)

qualification will be exempt from completing the course. Proof of the qualification will be required for exemption. Examples of partially compliant qualifications include:

- An older qualification in housing management or a housing degree which covers most, but not all, course content criteria;
- A technical qualification in building surveying, building management/maintenance, construction, building safety, estate/facilities/property management, which do not include training on customer service in housing, effective engagement with tenants, and equality, diversity, and inclusion (EDI) awareness including ranges of need and vulnerability;
- A qualification in leasehold or residential property management which does not include training on customer service in housing, effective engagement with tenants, and EDI awareness including ranges of need and vulnerability.

In-scope colleagues that have partial qualifications must complete any modules which reflect gaps in existing certifications per the qualification requirements. This must be completed within one year.

Colleagues are responsible for providing adequate evidence to support any request for full or partial exemption. Existing qualifications will be assessed against defined and consistently applied criteria, including evidence of modules completed, the proportion of current requirements already met, and the age of the qualification.

Professional memberships cannot be specified qualifications, such as with the Chartered Institute of Housing, the Chartered Institute of Building, or the Royal Institution of Chartered Surveyors, if the qualification was not undertaken as part of gaining membership.

2.4 Participation & Failure to Comply

Places for People has a regulatory obligation to comply with training requirements for in-scope Colleagues and faces reputational and financial penalties through the Regulator of Social Housing for non-compliance. Therefore, Colleagues that are in-scope have a mandatory requirement to complete the qualification within a reasonable timeframe which considers change in material circumstances (see section 4.1 for a list of approved exemptions and 4.2 for possible adjustments). The business will take all appropriate steps to support Colleagues in their completion of the qualification.

Colleagues enrolled in the course are expected to meet all necessary requirements. If a Colleague fails to meet the requirements of the course within the expected timeframe they will either:

- Be re-enrolled in the relevant course or qualification within 6 months of failing the course for which the business will cover the assessment fee;
- Be reassigned to an appropriate out-of-scope role;
- Have their employment terminated.

Those who are not required to receive the qualification (i.e. out of scope) but would like to for development purposes will be given a chance to participate. However, this is conditional on line manager approval, budget capacity, learning availability, and role suitability. In-scope Colleagues will be prioritised for qualification.

2.5 Appeals Process

If a Colleague believes that the determination of scope for their role is incorrect, they have the right to appeal. The Competence & Conduct Standard Working Group will arbitrate the appeals process and make final decisions around role scope. A copy of the appeal determination will be kept in the Colleague's personnel file. A flow chart in **Annex C** shows the full process.

2.6 Succession planning

Colleagues must be in their in-scope role for at least 6 months and then will be enrolled accordingly. There is no requirement for new or prospective Colleagues to hold the relevant qualification before they can be offered an in-scope role.

3.1 Mergers and Acquisitions

In the event of a merger or acquisition, Places for People will assess expected in-scope Colleagues and existing qualifications. Based on the results, a plan will be developed to achieve compliance. Colleagues must be in their role within the Places for People Group for at least 6 months and then will be enrolled accordingly.

4.1 Permanent and Temporary Exemptions

Below is a list of permanent exemptions for in-scope colleagues:

- Colleague already has the required qualification or equivalent.
- Colleague is on a fixed-term contract of three years or less. If the Colleague moves to a permanent contract after this period, they will be reassessed to determine if they are in-scope and would therefore need to meet the qualification requirements.
- Colleague undertakes a housing management-related apprenticeship and passes their apprenticeship assessment.

Below is a list of temporary exemptions for in-scope colleagues. Colleagues will be expected to meet the qualification requirements at the end of the exemption period.

- Colleague has been in their role for less than 6 months and/or has not passed their probationary period.
- Colleague is on approved extended leave, including maternity or paternity leave.
- Colleague is undertaking a longer duration course, such as an undergraduate or postgraduate degree which cannot be completed within the maximum 2-year limit.

4.2 Reasonable adjustments & EDI considerations

Places for People recognises that there may be unforeseen cases not covered by this policy where the course requirements cannot be met on time, including disability-related cases. In these circumstances, Colleagues are expected to work with their line manager to agree on an appropriate solution. Records of the Colleague's role (SHM/SHE), the reason enrolment requirements cannot be met in the expected timeframes, and the agreed-upon plan with the line manager must be kept. Please note that a reasonable adjustment cannot permanently exempt an in-scope Colleague from taking and passing the course.

5.1 PfP Scotland Approach

While this regulation does not apply to Scotland, PfP Scotland has adopted this training approach for consistency across the business.

Annex A: In-Scope Roles

The Training & Development Team will review and update this list at least every 6 months. Some titles include multiple roles.

Job Role	Business Area
Area Manager	Communities
Area Manager - Retirement Living	Communities
Area Manager (All Regions)	Lettings & Marketing
Asset Planning Manager	A&I
Asset Quality Compliance Manager	A&I
Assistant Portfolio Manager	Touchstone
Associate Director	Touchstone
Commercial Operations Director	Repair Operations
Community Safety Area Manager	Communities
Complaints Manager - Field Services	A&I
Complaints Team Manager	Customer Hub
Complex Complaints and Improvement Manager	A&I
Contract Management Team Lead	Repair Operations
Contract Performance Manager	Repair Operations
Customer Involvement and Standards Manager	Customer Hub
Customer Service Manager	Touchstone
Director of Asset Knowledge and Insight	A&I
Director of Asset Strategy and Investment	A&I
Director of Building Safety	A&I
Director of Communities	Communities
Director of Home Ownership	Communities
Director of Housing Operations	Communities
Director of Living Plus	Communities

Director of Operational Asset Investment	A&I
Director of Places for People Scotland	Communities
Disrepair Manager	A&I
Disrepair Manager	Repair Operations
Extra Care Manager	Living+
Field Operations Director	Repair Operations
Field Operations Manager	A&I
Fire Risk Assessment Delivery Manager	A&I
Fire Safety Manager	A&I
Head of Asset Infrastructure	A&I
Head of Asset Intelligence	A&I
Head of Asset Operations	A&I
Head of Asset Performance	A&I
Head of Building Safety Systems	A&I
Head of Communities	Communities
Head of Complex M&E	Repair Operations
Head of Contact Centre	Customer Hub
Head of Contractor Management	Repair Operations
Head of Customer Accounts	Customer Accounts
Head of Customer Focus	Customer Hub
Head Of Customer Hub Integrations	Customer Hub
Head of Disrepair	A&I
Head of Estates	A&I
Head of Field Operations	A&I
Head of Field Resource Planning	A&I
Head of Fire Safety	A&I
Head of Improvement and Engagement	Repair Operations
Head of Improvement and Integration	Communities
Head of Internal Operations	Repair Operations
Head of Investment Delivery	A&I
Head Of Investment Delivery South	A&I
Head of Investment Performance	A&I
Head of Investment Planning	A&I
Head of Lettings & Marketing	Lettings & Marketing
Head of Operations	A&I
Head of Operations Implementation/ Head of Disrepair	Repair Operations
Head of Programme Performance	A&I
Head of Resource Optimisation	Customer Hub
Head of Safe Quality Assurance	A&I
Head of Strategic Asset Management	A&I
Head of Supported Housing	Living+
Head of Surveying Services	A&I
Head of Void Transactions	A&I
Landscapes Operations Manager	A&I
Lettings and Marketing Team Manager	Lettings & Marketing
National Allocations Manager	Lettings & Marketing
National Arboriculture Manager	A&I

National Complaints Manager	Customer Hub
National Contact Centre Manager	Customer Hub
National Contractor Manager	Repair Operations
National Customer Focus Manager	Customer Hub
National Projects Manager	Group Support Services
National Safety Systems Manager	A&I
National Specialist Landlord Manager	Living+
National Standards Manager	Repair Operations
National Support Service Manager	Living+

Each business area lead has assessed the roles under their purview to determine if they are in-scope based on the guidance on SHM and SHE job duties.

Annex B: Methodology for determining in-scope staff

Scope

The following roles with job duties in scope and other qualifying criteria are listed below. Any criteria must be met for a colleague to be in scope. This also applies to sub-contractors.

Senior Housing Manager: manage the direct delivery of housing management services to tenants.

Senior Housing Executive: provide strategic direction and have accountability in relation to housing management services.

Housing management services include the following functions as they relate to the management of social housing, including sheltered, supported, and temporary social housing:

- General functions: customer services or complaints management, tenant involvement or empowerment, allocations and lettings management, tenancy and/or license management, income, and anti-social behaviour management.
- Technical functions: asset management, including building safety and/or fire safety management, estate management, capital/major works within occupied buildings.

Other qualifying criteria:

- A significant portion of their time is spent on these activities. "Significant portion" is defined as spending more than 50% of working hours on the relevant job duties¹
- Not an unpaid volunteer
- Have been in their current role for at least 6 months
- There is or was a probation period applicable to the current role and 9 months has elapsed since they began their role
- They do not already hold the qualification or are already deemed to be working towards the qualification
- No exemptions apply (prolonged absence from work, relevant qualification course is not available, etc.)

Senior Housing Manager²	Senior Housing Executive
Customer service management: includes those who oversee the process of delivering customer services to tenants, customer contact centres, etc.	Provides overall strategic direction and accountability regarding service quality
Complaints management: includes managing the collection and monitoring of customer feedback and complaints	Accountability for developing and embedding their organisation's culture into strategic objectives
Tenant involvement: includes managing delivery of resident activities, engagement with tenant groups, managing feedback and communications with tenants	Accountability for implementing strategies to manage and improve performance
Lettings management: includes managing process of lettings, including delivery of allocation and pre-tenancy stages, transfers, and mutual exchanges	Accountability for accessible and customer-focused policy and procedures
Tenancy and/or license management	
Income management: includes managing processes and communication regarding collection of rents and service charges, income recovery, addressing rent arrears and court proceedings, etc.	
Repairs and maintenance: includes managing responsive and timely repairs and are compliant	
Asset management: includes managing effective planning, scheduling, and delivery or technical surveying works, information on existing stock and considering tenant priorities in asset management decisions	
ASB management: includes managing policies and procedures to deal with and respond to ASB	
Estate management: includes managing estates, maintenance of communal areas, consulting with tenants on amenities, etc.	
Capital/major works: includes managing planning and scheduling of capital works programmes, procedures for consulting and communicating with tenants, etc.	

Please note, the above job titles are merely for reference. A colleague performing any of the job duties below, regardless of title, may be in scope.

Exempt functions:

The following functions or duties would not be in-scope.

- Roles associated with the development of new buildings or management of unoccupied homes.
- Functions that oversee or manage the housing register and make statutory assessments or decisions related to housing need or homelessness.
- Functions related to local authorities' strategic housing functions.
- Service providers who do not provide a comprehensive social management service, such as RMG.
- Back-of-house functions such as those in legal, IT support, data, procurement, finance (unless related to income management in a social housing context), and HR.
- Delivery of care and support provided to residents in supported housing.

Annex C: Appeals Process

To note that burden of proof is on the requester.

