Policy Owner	Hannah Tripp	Business Area	
Document Type			

Competence and Conduct Standard Policy

1.0 Aim / Purpose of the Policy

1.1 Coastline will ensure that colleagues involved in the provision of landlord services have and maintain the skills, knowledge, experience and behaviours needed to deliver good-quality, fair and respectful services. We do this through a culture of professionalism, accountability, continuous learning and customer focus, and will meet the applicable qualification requirements for specified senior housing managers and executives.

1.2 This policy sets out Coastline Housing Limited's approach to meeting the Competence and Conduct Standard. It brings together Coastline's existing culture, values, people policies and management arrangements and explains how they collectively support compliance.

1.3 The policy covers:

- The management and development of the skills, knowledge, experience and behaviours of relevant colleagues
- Learning, development and the maintenance and demonstration of competence
- Appraisal and regular performance review, including support and management where performance or conduct falls below the required standard
- The adoption and embedding of Coastline's Group Code of Conduct
- Appropriate and proportionate arrangements for services providers
- Meaningful customer influence and scrutiny, and
- Mandatory housing qualifications for designated senior housing managers and executives.

2.0 Scope and Definitions

2.1 This policy applies to Coastline Housing Limited and all relevant colleagues involved in the provision of landlord services. It also informs Coastline's approach to contractors and subcontractors where they meet the statutory definition of a services provider.

Relevant staff - Colleagues involved in the provision of landlord services. This may include colleagues who are not routinely customer-facing where their work contributes to the management of social housing.

Landlord services - Services connected with the management of social housing provided by Coastline.

Services provider - A provider falling within the statutory definition applicable to the Standard. Coastline will assess relevant contracting arrangements against that definition and record its conclusions.

Mandatory qualification roles - Specified senior housing managers and senior housing executives within the applicable government qualification requirements.

Competence - The combination of current skills, knowledge, experience and behaviours needed to perform a role effectively and contribute to good-quality landlord services.

2.2 The wider competence and conduct requirements apply to all relevant colleagues. Mandatory housing qualifications apply only to roles that fall within the applicable qualification requirements.

2.3 Regular monitoring of the guidance will enable identification and updates, as required.

3.0 Principles

3.1 The main principles of this policy are:

- **Customer outcomes -** competence and conduct should support good-quality, fair, equitable and respectful services
- **Role proportionality -** expectations and development will be tailored to the responsibilities and risk profile of different roles
- **Evidence -** Coastline will be able to evidence decisions about relevant staff, qualification scope, learning, performance and services-provider arrangements
- **Continuous improvement -** competence is maintained through learning, reflection, feedback, service insight and regular review
- **Fairness and inclusion -** colleagues will have equitable access to development, with reasonable adjustments and individual circumstances considered
- **Accountability -** responsibilities, monitoring and escalation will be clear
- **Transparency -** the policy and adopted Group Code of Conduct will be accessible to customers, who will have meaningful opportunities to influence and scrutinise them

4.0 Coastline's Culture, Values and Supporting Framework

4.1 Coastline's culture and values provide the foundation for the Standard, with professionalism demonstrated through accountability, ethical decision-making, respectful treatment of customers and colleagues, attention to vulnerability and diverse needs, openness to challenge, continuous learning and acting on feedback.

4.2 This policy is delivered through the following established arrangements, which provide the detailed procedures and controls:

- Values Framework and Group Code of Conduct
- Recruitment and selection arrangements and role profiles
- Induction and probation arrangements
- Training, Learning and Development Policy and learning records
- Continuous Conversations and performance reviews
- Performance and Capability Procedures
- Disciplinary Policy
- Equality, Diversity and Inclusion Policy
- Reasonable-adjustment arrangements
- Workforce planning and succession planning
- Customer feedback, complaints, service insight and learning, and
- Procurement, contract management and supplier performance arrangements.

4.3 Where inconsistency occurs, applicable legislation and regulatory requirements take precedence. Otherwise, related HR procedures and people policies remain the primary documents for their subject matter.

5.0 Identifying relevant colleague and role requirements

5.1 The People, Culture and Communications team will maintain an evidenced approach to identifying relevant colleagues and mandatory qualification roles. The Executive team will support this by reviewing roles when structures, responsibilities or services change.

5.2 Role profiles will describe the skills, knowledge, experience and behaviours required and requirements will be proportionate to the role, reflecting customer impact, professional or technical duties, decision-making responsibility and regulatory risk.

5.3 Recruitment and talent selection will test relevant requirements and verify qualifications, where applicable. Induction and probation will establish role expectations relating to learning and behaviours.

5.4 The relevant-colleagues and qualification-scope assessments will be reviewed at least annually and when material organisational or regulatory change occurs.

6.0 Learning, Development and Maintaining Competence

6.1 Coastline will provide role-appropriate learning and development so colleagues can maintain and demonstrate current competence. This will include a combination of mandatory learning, service-specific development, professional learning, coaching, experience, reflective practice and learning opportunities, from customers and service outcomes.

6.2 Learning needs may include customer service, housing practice, professional judgement, equality and inclusion, vulnerability, safeguarding, legal and regulatory

knowledge, data and information responsibilities, health and safety, leadership and stakeholder management, according to the role.

6.3 Learning needs will be identified through recruitment, induction, Continuous Conversations, service reviews, assurance activity, customer feedback, complaints, incidents, audits and regulatory change.

6.4 Managers will agree proportionate development objectives and review completion and application in practice. Required learning and qualifications will be recorded, monitored and refreshed where appropriate.

6.5 Reasonable adjustments and alternative learning arrangements will always be considered and colleagues are expected to engage with agreed learning, apply it in practice and raise barriers promptly.

7.0 Performance, Capability and Conduct

7.1 Managers will regularly review performance, competence and behaviours through Continuous Conversations and normal management arrangements. Reviews will consider delivery against role expectations, customer outcomes, Coastline's values, learning needs and evidence of current competence.

7.2 Where improvement is required, Coastline will normally seek to clarify expectations, identify causes, provide appropriate support, agree objectives and timescales, and review progress. Performance and Capability procedures will apply where performance falls below the required standard.

7.3 Conduct and behavioural concerns will be managed under the Group Code of Conduct and Disciplinary Policy, as appropriate and each case will be considered fairly and on its individual merits.

8.0 Group Code of Conduct

8.1 Coastline adopts its Group Code of Conduct as the appropriate code for the purposes of the Competence and Conduct Standard. It applies alongside the Values Framework and sets the conduct expectations that support professional, ethical and respectful and customer-driven services.

8.2 Colleagues will be expected to understand and demonstrate the Code in internal and external interactions and concerns or breaches will be addressed through the appropriate people procedures.

8.3 The Code will be kept current, fit for purpose and accessible to customers via Coastline's website and in other formats on request. Customers will be given meaningful opportunities to influence and scrutinise the Code when it is developed or reviewed.

9.0 Mandatory Housing Qualifications

9.1 Coastline will comply with all applicable qualification requirements for senior housing managers and senior housing executives, as listed in 9.2. These will be maintained within a separate Qualification Scope Assessment, and approved and reviewed periodically.

9.2

Role	Current assessed requirement
Deputy CEO with responsibility for Housing, Assets and Communities	Level 5
Assistant Director of Housing Services	Level 4
Assistant Director of Property Services	Level 4
Head of Repairs & Maintenance	Level 4
Head of Property Investment and Compliance	Level 4
Head of Housing Services	Level 4
Customer Feedback Lead	Level 4

9.3 The role list will be reviewed when guidance, legal interpretation, structures, case law or responsibilities emerge and change and roles in scope will be based on requirements and evidenced assessment, rather than by job title.

10.0 Enrolment, Completion and Support

10.1 Coastline will use the applicable statutory transition period of three years (October 2026 – 2029) and undertake a phased implementation plan. Qualification routes will be confirmed against current requirements before enrolment of any individuals.

10.2 Coastline funds mandatory qualifications and will provide reasonable work time, manager support and access to learning resources. A repayment agreement will not normally apply where the qualification is a mandatory requirement of the role, although where a colleague has requested additional training that is not a requirement and where Coastline choose to fund it, this will be treated as a normal Training Agreement and managed in accordance with Coastline's Training and Development Policy.

10.3 Colleagues must attend learning, complete assessments, engage with providers, apply learning and raise difficulties promptly. Long-term sickness, family leave, disability, neurodiversity and significant personal circumstances will always be considered, including reasonable adjustments and extensions where permitted.

10.4 If a colleague does not achieve a mandatory qualification, Coastline will review the circumstances, support provided, regulatory position and explore all available options. Ultimately, where a colleague does not pass the qualification and if it is a mandatory requirement of their role, they will not be able to continue in post. Redeployment or other employment action may be considered, following consultation and a fair process.

11.0 Contractors and Services Providers

11.1 Coastline's contractors do not generally act as Coastline's agents or provide a comprehensive social housing management service merely because they supply goods or services. They are therefore not automatically subject to the qualification requirements applying to specified senior housing managers and executives.

11.2 Coastline will nevertheless assess relevant contracting and subcontracting arrangements against the statutory definition of a services provider. The assessment and reasons will be recorded. Where an organisation falls within scope, Coastline will take appropriate and proportionate steps to secure assurance that relevant staff have the skills, knowledge, experience and behaviours needed to contribute to good-quality landlord services.

11.3 Assurance may include procurement requirements, contractual provisions, competence or qualification checks, implementation or induction requirements, performance indicators, customer feedback, audit rights, corrective action and regular contract-management discussions. Contract managers will escalate material concerns through normal governance and contract remedies.

12.0 Customer influence, scrutiny and Accessibility

12.1 Customers will have meaningful opportunities to influence and scrutinise this policy and the adopted Group Code of Conduct when developed or reviewed. Coastline will record the engagement undertaken, the feedback received, its response and resulting changes.

12.2 The approved policy will be accessible to customers, with alternative formats or support provided where reasonably required. Relevant customer insight, complaints and scrutiny findings will inform learning, role expectations and policy review.

13.0 Responsibilities

13.1 Responsibility for this policy and the commitments within in, sit across the organisation with the following roles and teams, taking responsibility for the appropriate actions:

Role	Responsibility
People, Culture and Transformation Committee	Approve the policy; receive assurance on implementation and review.
Executive Team	Ensure organisational implementation, capacity and resources; address material exceptions.
People, Culture and Communications Team	Maintain the policy, role-scope assessment, qualification tracker, guidance, learning framework and assurance reporting.
Directors and Managers	Define role requirements, support learning, review competence and behaviour, manage performance and notify People and Culture of relevant change.

Procurement and Contract Managers	Assess services-provider implications, build proportionate requirements into arrangements and monitor delivery.
Customer Engagement Leads	Facilitate meaningful influence and scrutiny and record the outcome.
Relevant colleagues	Maintain competence, engage with learning and review, demonstrate expected behaviours and raise barriers or concerns promptly.

14.0 Monitoring, Evidence and Assurance

14.1 The following are designed to ensure ongoing evaluation and assurance:

- Current assessment of relevant staff and mandatory qualification roles
- Qualification status, enrolment, progress, completion and exceptions
- Required learning, professional development and application in practice
- Performance and capability information, considered in line with confidentiality requirements
- Services-provider assessments and contract assurance
- Customer engagement, scrutiny and resulting changes
- Customer outcomes, complaints, feedback, incidents and learning relevant to competence or conduct
- Annual self-assessment against the consumer standards, and
- Periodic assurance reporting to PCTC during the transition period.

14.2 Any material, actual or potential non-compliance concerns will be escalated promptly through Coastline's governance and regulatory engagement arrangements.

15.0 Quality, Data Protection and Records

15.1 Coastline applies this policy fairly and consistently, and will consider equality impacts, individual needs and reasonable adjustments wherever appropriate to do so. Qualification and performance information will be processed in accordance with applicable data protection requirements and retained only as necessary for employment, regulatory and assurance purposes and for the appropriate retention period.

16.0 Review and document control

16.1 This policy remains in force until replaced by an approved revision. It will be reviewed annually during the qualification transition period and at least every three years thereafter, or sooner where legislation, regulatory requirements, guidance, organisational arrangements, customer insight or learning indicate that review is necessary. Material policy changes will return to PCTC for approval.

Policy Ends