WOKINGHAM BOROUGH COUNCIL

Approved by Tenant Volunteers

Wokingham Borough Council

Housing Competence and Conduct Application Statement and Code of Conduct

October 2026



This Application Statement explains how Wokingham Borough Council applies the Competence and Conduct Standard within Housing. It explains how the Council's corporate conduct and people-management arrangements, together with Housing-specific controls, support compliance with the Standard and should be read alongside the Housing Services Code of Conduct included in this document.

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The approval route for this policy will follow the Council's agreed housing governance process. This will include review by the relevant Housing Service management forum, consultation with Human Resources and Legal Services where required, resident engagement and scrutiny, and formal approval through the appropriate delegated decision-making route before publication.

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SIGNING OFF SECTION

This document has been subject to consultation, proof-reading, ease of reading and sign off, with the following:

- Consultation:
- Housing Senior Managers
- Human Resources
- Resident Volunteer Groups: Resident Engagement & Partnership Consultation Panel, Chairs Panel.

- Sign-off:
  - Housing Leadership Team 24/09/26
  - Housing Innovation Partnership 28/09/26
  - Human Resources 30/09/26
  -

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1. Overview

1.1 This Application Statement sets out how Wokingham Borough Council applies the Competence and Conduct Standard within Housing and how compliance will be achieved, monitored and assured. It ensures that staff involved in the provision of landlord services have the skills, knowledge, experience and behaviours needed to deliver good-quality, respectful and resident-focused services. It explains how the Housing Service will identify the requirements for different roles, tailor learning and development, appraise and regularly review performance, manage poor performance, adopt and maintain a code of conduct, and take appropriate steps to secure that relevant staff of service providers meet the same competence and conduct expectations where they deliver services on the Council's behalf.

1.2 The Council's corporate conduct and people-management arrangements remain the authoritative framework through which employees are managed and held accountable. This Application Statement explains how those arrangements, together with Housing-specific controls, apply to landlord services and support compliance with the Regulator of Social Housing's Competence and Conduct Standard. The Housing Services Code of Conduct then sets out the standards and behaviours that residents, colleagues and stakeholders should experience in practice.

2. Purpose

2.1 The aim of this Application Statement is to explain how Housing applies the Competence and Conduct Standard so that residents receive safe, respectful and good-quality landlord services from people with the appropriate skills, knowledge, experience and behaviours. It will:

- ensure staff are sufficiently qualified to deliver good-quality services to residents;
- set out the Housing Service's approach to identifying and handling poor performance;
- outline the Housing Service's commitment to staff development; and

- explain that this Application Statement explains Housing's approach to supporting compliance with the Competence and Conduct Standard, while not replacing the Council's Conduct Policy or any other relevant corporate policy.

3. How to use this document

3.1 The Application Statement explains how the Housing Service applies the Competence and Conduct Standard, including scope, responsibilities, qualification requirements, monitoring and assurance arrangements. The Housing Services Code of Conduct explains the behaviours residents, colleagues and stakeholders should experience in practice.

4. Scope

4.1 This Application Statement applies to all Wokingham Borough Council Housing Service staff involved in the provision of landlord services, whether employed directly, engaged through an agency, or otherwise working on behalf of the Council, except for exemptions set out below.

4.2 This Application Statement also applies to service providers, contractors, consultants, arms-length bodies and partners where they deliver landlord services or functions on the Council's behalf that affect service quality, resident experience, resident safety or the management and maintenance of social housing, with the exception of exemptions set out below.

4.3 The provisions relating to financial support, reimbursement of fees and time off for qualifications do not apply to agency staff, contractors, casual workers or any employee of an external third party.

4.4 This Application Statement is aligned with the Competence and Conduct Standard for social housing and the Government's associated policy statement. Qualification requirements apply to Senior Housing Managers and Senior Housing Executives where housing management forms a substantive part of their role, and to relevant service-provider arrangements where landlord services are delivered on the Council's behalf.

4.5 The Competence and Conduct Standard at this point does not set out expectations in relation to qualifications for roles below Senior Housing Executives and Senior Housing Managers; however, there is a requirement that all staff are competent and

committed to ongoing professional development. This will be managed in accordance with corporate and service-specific policies and frameworks; along with learning from resident, Ombudsman and Regulator feedback.

5. Legislation, regulatory requirements and corporate standards

5.1 WBC will take into consideration the following when implementing this Application Statement: The Competence and Conduct Standard for social housing; the Government's Competence and Conduct Standard policy statement; the Housing and Regeneration Act 2008, as amended by the Social Housing (Regulation) Act 2023; and the Housing Act 2004 where relevant to fit and proper person considerations.

5.2 In addition to the above legislation and regulatory requirements, the Housing Service will operate this Application Statement in accordance with the Council's terms and conditions of employment, individuals' contractual obligations and relevant people-management policies governing areas including, but not limited to, conduct, capability, disciplinary, probation, performance and learning and development.

5.3 All staff will be required to complete all mandatory corporate and appropriate Housing-specific training as part of induction/onboarding, and refresher training at mandated intervals. Compliance will be monitored through the Council's Performance Management Framework and probation process.

5.4 Through this Application Statement and the Housing Services Code of Conduct, WBC demonstrates how it meets the requirements set out in the Consumer Standards published by the Regulator of Social Housing.

6. Definitions

6.1 **Housing Management Services:** include services provided in connection with the management of social housing, including tenancy management, repairs and maintenance, estate management, customer services, lettings management, income management, asset management, building and fire safety, antisocial behaviour management, resident engagement, complaints handling and capital or major works where these functions affect residents, residents, service quality or the management and maintenance of social housing.

6.2 **Relevant staff:** staff involved in the provision of landlord services, including staff whose roles contribute to the management of social housing, resident services,

housing management, repairs and maintenance, resident safety, service quality, complaints, engagement, tenancy sustainment or related landlord functions.

6.3 **Senior Housing Manager:** an individual who has responsibility for managing the delivery of housing management services to social housing residents and for whom that responsibility forms a substantive part of their role. This may include responsibility for direct service delivery, service quality, resident safety, tenancy management, repairs and maintenance, estate management, income management, lettings, customer services, complaints, engagement, asset management, building and fire safety, antisocial behaviour or capital and major works, where these functions are connected with the management of social housing.

6.4 **Senior Housing Executive:** an executive or senior officer who has strategic responsibility for the delivery of housing management services to social housing residents, where housing management forms a substantive part of their role. This includes senior posts that set strategic direction, hold accountability for service quality, or oversee delivery of relevant landlord functions.

6.5 **Transition Period:** As set out by the Regulator of Social Housing in the Competence and Conduct Standard Policy Statement; Registered Providers that own over 1000 Social Housing units, the transition period is 36 months, from the date that the Competence and Conduct Standard comes into force. For small Registered Providers that own fewer than 1000 Social Housing units the transition period is 48 months from the date that the Competence and Conduct Standard comes into force.

7. Roles and Responsibilities

7.1 The Regulator of Social Housing (RSH) is responsible, on behalf of the Government, for monitoring and regulating compliance with the new Standard through its assurance-based approach to regulation.

7.2 The following roles (titles correct at the time of writing), have specific responsibilities under this Application Statement and the Housing Services Code of Conduct:

7.2.1 Service Director - Housing: Responsible for approving the Housing Competence and Conduct Application Statement and Housing Services Code of Conduct and overseeing the operational delivery and service quality of Housing Services, including performance and compliance with this Application Statement.

7.2.2 Head of Housing Operations: Responsible for operational oversight of housing management services, ensuring relevant teams maintain competence,

complete required training and deliver services in line with this Application Statement.

7.2.3 Head of Housing Needs & Options: Responsible for ensuring housing needs and homelessness services are delivered by competent staff, in line with legislation. The Housing Management function for WBC's temporary accommodation also lies within the Housing Needs and Homelessness Service. The post therefore has operational oversight that relevant learning, conduct and performance requirements are embedded across the service area, in line with this Application Statement.

7.2.4 Strategic Asset Manager: Responsible for ensuring asset management, repairs, maintenance and building safety functions are supported by competent staff and service providers operating in line with this Application Statement.

7.2.5 Service Manager – Housing Management & Income: Responsible for implementing the requirements set out in this Application Statement and overseeing operational delivery of the Housing Management function across general needs, sheltered housing and supported accommodation properties that WBC own.

7.2.6 Senior Specialist Repairs & Maintenance: Responsible for supporting competent delivery of repairs and maintenance services, monitoring relevant contractor/service-provider expectations and escalating competence or conduct concerns where required.

7.2.7 Senior Specialist – Planned Work: Responsible for supporting competent delivery of planned, capital works, monitoring relevant contractor/service-provider expectations and escalating competence or conduct concerns where required.

7.2.8 Housing Partnership and Engagement Manager: Responsible for ensuring customer contact, complaint handling and resident engagement services are delivered by skilled, professional and resident-focused staff. They will use complaint and engagement insight to inform learning, service improvement and policy development.

7.2.9 Team Manager: Housing Needs and Options: Responsible for implementing the requirements set out in this Application Statement and overseeing operational

delivery of the Housing Management function across WBC-owned temporary accommodation for homeless households.

8. How the Application Statement works

8.1 Competence – Relevant Qualifications

8.1.1 The Housing Service will require existing Senior Housing Managers and Senior Housing Executives who are in scope of the qualification requirements to hold, or be working towards, the relevant housing management qualification within the transition arrangements set by the Competence and Conduct Standard. All relevant individuals appointed after the conclusion of the transition period will be required to hold the appropriate qualification on appointment, unless the Competence and Conduct Standard or associated regulatory requirements provide otherwise. Where relevant, the Council will reinforce this requirement through the contract of employment.

8.1.2 The qualification must be focused on managing the delivery of social "housing management".

8.1.3 For **Senior Housing Managers**, the Relevant Qualification must be at a Level 4 and regulated by the Office of Qualifications and Examinations Regulation ('Ofqual').

8.1.4 For **Senior Housing Executives**, the Relevant Qualification must be at a foundation degree or Level 5 regulated by Ofqual.

8.1.5 Any Relevant Individual who holds a partially compliant qualification will need to complete the required top-up modules within the timescales set by the Competence and Conduct Standard and associated policy statement.

8.1.6 If a Relevant Individual achieves a partially compliant qualification during the transition period, they must complete any required top-up modules within the timeframe specified by the Competence and Conduct Standard and associated policy statement.

8.1.7 The Housing Service will require all Senior Housing Managers to hold the Level 4 Housing Qualification and Heads of Service upwards ('Senior Housing Executives') to hold the Level 5 Housing Qualification or be working towards such qualifications.

Registered Providers and Sub-Contractors:

8.1.8 All Relevant Managers of service providers or sub-contractors responsible for the delivery of housing management services on behalf of the Council must hold, or be working towards, the Relevant Qualification where the qualification requirements apply to their role and the services provided under the relevant management services agreement.

8.1.9 Registered Providers will, in turn, be required to take steps to secure that all Relevant Managers of their Service Providers with which they have a Management Services Agreement:

i. consider how they will use the terms which are implied into Management Services Agreements by s217A of the Act in taking the steps to secure that, the Relevant Service Provider Managers of their sub-contractors have, or be working towards, a Relevant Qualification;

ii. bring the qualification element of the Competence and Conduct Standard to the attention of their sub-contractors that are Services Providers in relation to the Registered Provider; and

iii. take steps to secure that those sub-contractors are aware of their obligations under the implied terms.

Exemptions:

8.1.10 The Relevant Qualification requirements do not apply to back-office managerial roles who do not deliver functions involving the management or direct delivery of services to residents, including, but not limited to, those in finance teams whose functions include the processing of direct debits, housing benefit/universal credit payments and accounting, unless they are equivalent to Senior Housing Manager or Executive level.

8.1.11 Individuals set to retire before the end of the transition period applied to the Competence and Conduct Standard for social housing are not required to enrol upon such a qualification. Such individuals should be aware that should they later revise their retirement plans; the Council will be unable to allow them to remain in a relevant role beyond 30 September 2029 without the requisite qualifications. This may affect continued employment and/or earnings.

Pre-Existing Qualifications and Pre-Qualifications:

8.1.12 Where a relevant individual believes they hold a pre-existing qualification meeting the requirements under this Application Statement, it is the individual's responsibility to obtain proof of those qualifications. Any costs associated with the replacement of documentation must be met by the individual.

8.1.13 For all Relevant Individuals, it is the individual's responsibility to acquire any pre-qualifications necessary, for example an entry-level housing qualification. Sponsorship or reimbursement of any associated costs will be considered by the Council in line with corporate learning and development policy. An Apprenticeship funded by the Housing Revenue Account (HRA) will not normally be considered for pre-qualifications.

8.1.14 Existing staff in relevant roles will be supported to achieve the required qualifications. Employees will be eligible for either an apprenticeship agreement or sponsorship in line with the corporate learning and development policy, as appropriate to their chosen qualification route. This will include financial support for course fees, paid study time and examination fees and resits.

8.1.15 The provisions of the corporate learning and development policy will apply unless the provisions in the Standard are more generous. Staff receiving financial support and/or paid time off will be required to sign a Learning Agreement which provides for the reimbursement of Council costs if the employee leaves the Council during study or a prescribed period post-qualification.

8.1.16 Agency staff, contractors and casual workers will not be eligible for reimbursement of course or examination fees or paid time off but may be permitted to take unpaid time off to complete qualifications.

Failure to achieve or hold a required qualification

8.1.17 Under the Standard, all staff in relevant roles must hold the specified qualification. After the transition period, the Council will be unable to employ or engage any worker who does not hold the required qualification in a relevant role.

8.1.18 Where an individual studies for but is unable to complete a required qualification, this will be managed in accordance with the relevant HR policy and support will be provided to assist the individual to qualify.

8.1.19 If an individual refuses to undertake a required qualification this will be treated as a conduct matter. Ultimately, if an individual in a relevant role does not hold a required qualification this may result in termination of employment or engagement.

Succession Planning and Personal Development

8.1.20 During the transition period, the Council will prioritise funding for existing employees in relevant roles to complete required qualifications. Individuals who are not in relevant roles but wish to develop a career in Housing should discuss their aspirations with their manager as part of the Council's performance framework. The Housing Leadership team will also consider sponsorship for study for individuals under workforce and succession planning. Sponsorship and apprenticeships will be considered in line with the relevant Council policies.

8.2 Conduct

8.2.1 In addition to the Council's corporate Conduct Policy, a Housing-specific Code of Conduct sets out the behaviours expected of all relevant staff when delivering landlord services, including resident focus, professionalism, respect, accountability, safe service delivery, effective communication, responsiveness to complaints and learning from resident feedback. The Code gives practical effect to this Application Statement but does not replace the Council's authoritative corporate conduct or people-management arrangements. Managers will ensure that the Code is discussed through induction, supervision, one-to-one meetings, annual performance reviews and learning and development activity.

8.2.2 The Housing Service will ensure that all staff, including Senior Housing Executives and Senior Housing Managers who are Relevant Individuals in scope of the Relevant Qualification requirements, understand the standards of performance and behaviour expected in their roles.

8.2.3 All staff, including Relevant Individuals, must attend annual performance reviews and regular one-to-one meetings with their line manager to discuss performance, conduct, learning and development requirements.

8.2.4 Any performance or conduct concerns will be addressed through regular one-to-one meetings, with the aim of identifying difficulties, agreeing support and resolving issues at the earliest opportunity. Any formal action required to ensure compliance with required standards or performance or conduct will be managed

in accordance with the relevant Council policies, including Conduct, Capability and Disciplinary, as appropriate.

9. Monitoring and Review

9.1 This Application Statement and the Housing Services Code of Conduct will be formally reviewed after their first year of operation. The review will consider implementation experience, resident feedback and scrutiny, complaints and service learning, qualification progress, staff and manager experience, Code awareness and embedding, service-provider assurance, regulatory developments, and relevant audit and assurance findings. After this first-year review, they will normally be reviewed every three years, or earlier where changes in legislation, regulation, corporate arrangements, good practice or service delivery make this necessary.

9.2 The Housing Service will monitor and report on compliance with this Application Statement and the Housing Code of Conduct on an ongoing basis, including role-scope decisions, qualification status, learning and development completion, appraisal and performance review activity, poor-performance action where relevant, service-provider assurance, resident engagement and Code of Conduct review activity.

9.3 The Housing Service will maintain an up-to-date register of roles and postholders within scope of this Application Statement, including the basis for determining whether each role is a Relevant Individual, the qualification requirement that applies, current qualification status, learning and development requirements, performance review status and any agreed support or action plan. Compliance will be reviewed through service management arrangements and reported through the Housing Service's governance and assurance framework.

9.4 Residents will be given meaningful opportunities to influence and scrutinise the development, adoption and review of this Application Statement and the Housing Services Code of Conduct. Resident engagement, scrutiny and resulting decisions will be evidenced through a controlled engagement and decision record showing the engagement undertaken, views received, how those views were considered, changes made and reasons where suggestions were not adopted.

9.5 The Housing Service will keep this Application Statement and the Housing Services Code of Conduct up to date, fit for purpose and accessible to residents. The Application Statement and Code will be published through appropriate resident-

facing channels, and accessible versions or alternative formats will be made available on request.

10. Equality and diversity

10.1. WBC recognises the needs of a diverse population and always acts within the scope of its own Equality and Diversity Policy, the Human Rights Act 1998 and Equality Act 2010. WBC works closely with its partners to ensure it has a clear understanding of its resident community with clear regularly updated service user profiles. WBC will record, analyse and monitor information on ethnicity, vulnerability and disability.

10.2. A copy of the Equality Impact Assessment completed for this policy can be found as an appendix.

11. Appendices

11.1 Equality Impact Assessment: Appendix 1 shared internally only.

The following Code gives practical effect to the approach described in this Application Statement. It explains the standards and behaviours that residents, colleagues and stakeholders should experience from people delivering Housing services. The Code forms part of Wokingham's response to the Competence and Conduct Standard and can also be provided or published as a standalone resident-facing document.

Housing Services Code of Conduct

1. Purpose

This Code of Conduct sets out the standards of behaviour, integrity and professionalism expected of all employees, agency workers, contractors and managers involved in delivering Housing services. It does not replace the Wokingham Borough Council Conduct Policy; the Council's corporate conduct and people-management arrangements remain the authoritative framework for managing and holding employees accountable. This Code explains the Housing-specific behaviours expected in practice and supports consistent, ethical and resident-focused service. It also supports the commitments set out in the Resident Charter by reinforcing the behaviours residents should expect from Housing staff in every interaction.

The Code supports our commitment to:

- **Delivering safe, high-quality housing services.**
- **Treating residents fairly, with dignity and respect.**
- **Promoting trust and confidence in housing services.**
- **Demonstrating the values and behaviours expected of housing professionals.**
- **Meeting the requirements of the Competence and Conduct Standard and the Chartered Institute of Housing (CIH) Professional Standards.**
- **Supporting the Housing Competence and Conduct Application Statement and the Council's authoritative corporate arrangements.**
- **Giving practical effect to the Resident Charter by setting clear expectations for respectful communication, accountability, transparency, fairness, safety and responsiveness in Housing services.**

2. Scope

This Code applies to all staff involved in the delivery, management or support of housing services.

All staff are expected to:

- Read and understand this Code.
- Uphold its principles in their daily work.
- Act in a manner that promotes public confidence in the organisation and the housing profession.

Failure to comply with this Code may result in management action under the organisation's capability, disciplinary or other relevant procedures.

This Housing Services Code of Conduct should be read alongside the Wokingham Borough Council Conduct Policy and the Resident Charter, with the corporate framework remaining authoritative for employment and people-management matters.

The Customer Charter sets out the service standards and behaviours residents can expect from the Council; this Code supports delivery of those commitments by requiring staff to act with respect, fairness, honesty, accountability and care.

3. Our Professional Standards

We will demonstrate the following values and behaviours in all our work:

Professionalism

We will maintain the knowledge, skills and competence required to perform our roles effectively and safely.

Integrity

We will be honest, transparent and trustworthy in all our actions and decisions.

Ethics

We will make fair and impartial decisions and act in the best interests of residents and communities.

Inclusivity

We will value diversity, challenge discrimination and create an environment where everyone is treated fairly.

Respect

We will treat all people with dignity, courtesy and empathy.

Accountability

We will take responsibility for our actions, decisions and service outcomes.[cih.org]

4. Respecting Residents

We will:

- Treat residents with dignity, respect and compassion.
- Listen actively to residents and seek to understand their circumstances.
- Communicate clearly, honestly and professionally.
- Recognise that residents may have different needs and experiences.
- Avoid discriminatory, intimidating or inappropriate behaviour.
- Ensure residents are treated fairly and consistently.

We will never:

- Abuse our position.
- Discriminate against any person.
- Use offensive, disrespectful or inappropriate language.
- Victimise or disadvantage residents who raise concerns or complaints.

5. Equality, Diversity and Inclusion

We are committed to promoting equality and fostering inclusive services.

Staff will:

- Comply with the Equality Act 2010.

- Challenge discrimination and unacceptable behaviour.
- Ensure services are accessible and responsive to diverse needs.
- Make reasonable adjustments where required.
- Promote fairness in all decision-making.

6. Professional Competence

Staff must:

- Maintain the skills, knowledge and behaviours required for their role.
- Participate in training, learning and development activities.
- Seek advice when unsure how to proceed.
- Keep up to date with relevant legislation, regulation and best practice.
- Reflect on feedback and continuously improve performance.

Managers will support staff to develop and maintain competence through supervision, appraisal and professional development.

7. Integrity and Ethical Behaviour

Staff will:

- Act honestly and lawfully at all times.
- Make decisions based on evidence, policy and professional judgement.
- Avoid situations that may compromise impartiality.
- Declare any actual or perceived conflicts of interest.
- Use public resources responsibly.

Staff must not:

- Seek personal benefit from their role.

- Favour particular individuals or organisations.
- Accept gifts, rewards or hospitality that could influence decision-making.

8. Professional Boundaries

Staff will maintain appropriate professional boundaries with residents, families, contractors and partners.

Staff must not:

- Develop relationships that could compromise professional judgement.
- Accept personal financial benefits from residents.
- Share personal information unnecessarily.
- Conduct private business with residents.

Any potential conflict of interest must be declared immediately.

9. Safeguarding and Supporting Vulnerable Residents

Staff have a responsibility to protect the wellbeing of residents.

We will:

- Remain alert to safeguarding concerns.
- Report concerns promptly through appropriate procedures.
- Work collaboratively with safeguarding partners.
- Treat vulnerable residents with additional sensitivity and understanding.
- Support residents to access appropriate services and assistance.

10. Communication and Resident Engagement

We will:

- Provide accurate and timely information.

- Explain decisions clearly.
- Listen to feedback and concerns.
- Encourage meaningful resident involvement.
- Respond constructively to challenge and scrutiny.

Residents should feel heard, respected and valued in all interactions.

11. Confidentiality and Information Management

Staff will:

- Protect personal and sensitive information.
- Comply with data protection legislation and organisational policies.
- Use information only for legitimate business purposes.
- Share information appropriately and lawfully.

Staff must never:

- Access information without a legitimate reason.
- Disclose confidential information inappropriately.
- Use information for personal gain.

12. Accountability and Learning from Mistakes

We will:

- Take ownership of our decisions and actions.
- Acknowledge mistakes when they occur.
- Apologise where appropriate.
- Learn from complaints, feedback and service failures.
- Act promptly to put things right.

Staff must not conceal errors, misconduct or poor practice.

13. Working with Colleagues, Partners and Contractors

We will:

- Work collaboratively and professionally.
- Treat colleagues and partners with respect.
- Promote a positive workplace culture.
- Challenge unacceptable conduct.
- Support ethical and transparent working practices.

Managers will lead by example and promote high standards of behaviour.

14. Speaking Up

Staff are encouraged to raise concerns where they believe there may be:

- Poor service delivery.
- Unethical conduct.
- Fraud or corruption.
- Safeguarding concerns.
- Health and safety risks.
- Breaches of this Code.

Concerns raised in good faith will be treated seriously and without detriment to the individual raising them.

15. Compliance and Review

This Code will be:

- Made available to all staff and residents.

- Formally reviewed after its first year of operation, alongside the Housing Competence and Conduct Application Statement, taking account of resident feedback, implementation experience and relevant assurance evidence.

Reviewed regularly thereafter to ensure it remains current, effective and aligned with the Council's corporate arrangements.

- Supported by training and awareness activities.

- Monitored through supervision, performance management, complaints, resident feedback and assurance processes.

All staff are expected to comply with this Code and uphold the professional reputation of the housing service and the wider housing profession.[cih.org][assets.pub...ice.gov.uk]

Staff Declaration

I have read, understood and agree to comply with the Housing Services Code of Conduct. I understand my responsibility to uphold these standards and to promote professionalism, integrity, respect and accountability in all aspects of my work.

Name: _____

Signature: _____

Date: _____

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