

Housing and Communities Overview and Scrutiny Panel 18 March 2026

Social Housing Regulation Act (2023) Progress Report Number 6 (Competence and Conduct Requirements)

Purpose	To Review
Classification	Public
Executive Summary	<p>This report provides the Housing & Communities Overview and Scrutiny Panel with an update on the Council's progress in preparing for the introduction of the Competence and Conduct requirements arising from the Social Housing Regulation Act (2023), which will become enforceable from October 2026.</p> <p>The report confirms that NFDC is well positioned, having proactively begun preparations before final requirements were published.</p> <p>Significant progress has been made towards the mandatory qualification requirements, with all Service Managers either qualified or on track to complete relevant CIH-accredited courses, and team managers participating to exceed minimum regulatory expectations. Compliance is expected well before the October 2029 deadline.</p> <p>The report identifies the need to develop two key housing specific documents—</p> <ul style="list-style-type: none"> • Learning and Development Procedure, and • Housing Code of Conduct— both of which must be produced meaningfully with tenants, as required by the Competence and Conduct Standard.

Recommendation(s)	<p>That the Housing and Communities Overview and Scrutiny Panel:</p> <ol style="list-style-type: none"> 1. consider the Housing Landlord’s preparation for compliance in meeting the competence and conduct requirements and make any further recommendations to the Portfolio Holder for Housing and Homelessness; 2. note the significance that has been given to ensure the tenants of NFDC continue to receive a professional service from competent officers; and 3. receive a further report on the readiness for the Competence and Conduct requirements of the Consumer Standards, including final versions of the documents required to fulfil the requirements as stated in this report, at its September 2026 meeting.
Reasons for recommendation(s)	<p>This report supports the Council’s Corporate Plan 2024–28, particularly in delivering on priorities related to resident wellbeing, housing needs, and community safety. It also outlines the financial, legal, and operational implications of achieving full compliance with the Consumer Standards Standard.</p>
Ward(s)	All
Portfolio Holder(s)	Councillor Steve Davies, Housing and Homelessness
Strategic Director(s)	Peter Matthew – Housing and Communities
Officer Contact	<p>Lucy Spence Housing Policy and Projects Officer 02380 285 792 lucy.spence@nfdc.gov.uk</p>

Introduction and background

1. A comprehensive background to the implementation of the Social Housing Regulation Act (SHRA 2023) was given in the [January 2025 report](#) to this Panel. Since then, each of the four consumer standards

have been looked at against our gap analysis and work being completed.

2. Progress against the Transparency, Influence and Accountability (TIA) standard was considered in March, the Tenancy Standard in June 2025, the Neighbourhood and Community Standard in September 2025 and the final report on the Safety and Quality Standard was considered in January 2026.
3. The previous Government undertook a public consultation seeking views on a regulatory Competence and Conduct standard, including qualification requirements in 2024. The results of which were published in September 2025.
4. The Competence and Conduct requirements were being referred to as the 'fifth consumer standard' however, we now know, while the requirements remain and will be part of regulation from October 2026, they are likely to sit under the Transparency Influence and Accountability standard rather than as a standalone standard.
5. The Regulator of Social Housing (RSH) has conducted a further consultation seeking views on the changes to the Transparency, Influence and Accountability standard which NFDC responded to. This closed at the beginning of March 2026; we now will await the RSH's responses and confirmation of changes to the Standard to incorporate the Competence and Conduct requirements.
6. As reported in January at our first annual engagement meeting with the RSH in December 2025, it became apparent that their regional team did not have any immediate regulatory concerns about NFDC and there is unlikely to be a planned regulatory inspection in the first two quarters of 2026.
7. If an inspection comes after October 2026 the Regulator will want to see evidence of compliance against the Competence and Conduct requirements. There is also an assumption that if inspected in the lead up to October the regulator may ask to see plans for preparedness.

Competence and Conduct Requirements

8. The introduction of the Competence and Conduct Standard stems directly from the evidence heard by the Grenfell Inquiry and forms part of the government's wider response to the tragedy. The standard will play a pivotal role in the wider work taking place across government to improve the quality of social housing, and it is an important step in professionalising the sector.

9. It is worth noting that NFDC did not wait for confirmation of the implementation of the Competence and Conduct requirements to establish preparations. A self-assessment against the proposed requirements took place and resulting gap analysis actions have been tracked alongside all other consumer standards.
10. All these reports aim to give an accurate picture of the current state of compliance with the standards and the improvement plans in place. The aim is to ensure Members receive transparent assurance that the service understands any compliance gaps and has a clear plan to prioritise and implement required improvements in reasonable timescales taking account of higher risk areas.
11. Each regulated Consumer Standard is broken down into specific expectations. As the finalised Competence and Conduct requirements have yet to be formally published, the consultation outcome, Direction on the Regulatory Standards (Competence and Conduct) 2025, published in September 2025 has been used to aid our preparation and the formation of this report.
12. This report has been broken down in these known areas and performance measured against the outcomes of the self-assessment and gap analysis process.
13. The underlying message across all requirements is; *'Registered providers must, secure that those of their staff who are relevant individuals (individuals involved in the provision of services in connection with the management of social housing provided by the registered provider) have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the relevant services provided by those individuals to be of a good quality.'*

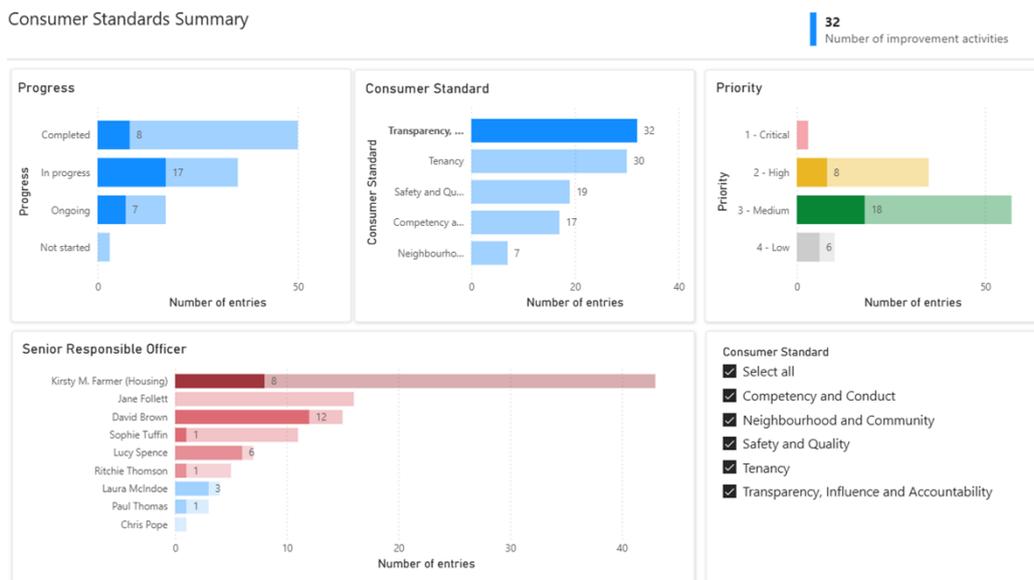
Preparedness for Regulatory Compliance

14. The first stage of the preparedness process was the completion of a self-assessment against the known requirements published by the Housing Quality Network. This resulted in action plans and a gap analysis tracker. The Competence and Conduct self-assessment has been reviewed following the publication of further guidance around the requirements.
15. A full explanation of the methodology of the self-assessment process was provided in the [March 2025](#) report to Panel.
16. We have previously reported on the council's 'mock inspection'. While the mock inspectors had sight of the Competence and Conduct self-

assessment and gap analysis, this was not part of the mock inspection process.

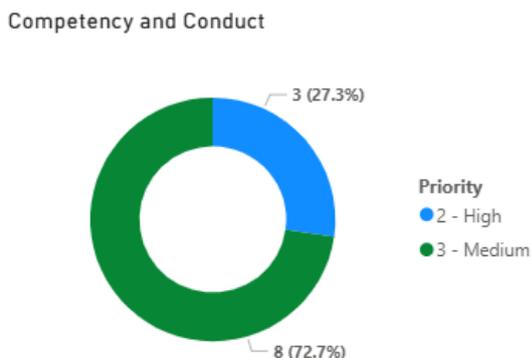
- Chart 1 below displays the current active gaps across the 4 consumer standards, with the competence and conduct requirements alongside. When the finalised requirements are published as part of the Transparency, Influence and Accountability Standard they will be included within the standard.

Chart 1: Current Improvement Activities identified through gap analysis across all standards



- Chart 2 below demonstrates the priority rating for the 11 identified live improvements within the competence and conduct requirements.

Chart 2: Priority Ratings.



Preparing for the introduction of mandatory qualifications

19. *'Registered providers must secure that their Senior Housing Executives and Senior Housing Managers have, or are working towards, a specified qualification, or type of qualification, in housing management and take steps to secure that Relevant Managers of their services providers also gain a specified qualification.'*
20. This element of the requirements has an extended date for full compliance of October 2029. However, as demonstrated below, NFDC is in line to be fully compliant before this date.
21. The Housing Performance and Training Officer led on identifying which roles fall in scope of the mandatory qualifications and established a business partner agreement with the Chartered Institute of Housing to provide the courses.
22. The following posts have been identified as being in scope,

Post Title	Level of Qualification
Strategic Director Housing and Communities	Level 5
Assistant Director - Housing	Level 5
Service Manager Housing Maintenance Programmes and Servicing	Level 4
Service Manager Housing Residents Services	Level 4
Service Manager Housing Major Projects	Level 4
Service Manager Housing Options and Tenancy Accounts	Level 4

23. All Service managers have either completed the level 5 qualification or have enrolled and are due to complete within timescales.
24. When the new Strategic Director is in post, they will have until October 2029 to have completed a level 5 qualification.
25. NFDC has taken the decision to include all team managers within the level 4 qualification programme.
26. Of the 13 team managers, 2 already hold a level 4 qualification, 5 are due to complete their course by October 2026 and 6 are due to enrol on a course starting in 2026.
27. There is planning to work with HR to ensure the elements of the mandatory qualification requirements that may require changes to, for example, contracts - incorporating qualification requirements, timelines and distinguishing between refusal to engage with the qualification and the inability to complete despite effort, take place.

Preparing for the introduction of the broader Competence and Conduct Standard

28. *'Registered providers must –*

- a) have a written policy setting out their approach to a number of things such as learning and development, appraising staff, and managing poor performance,*
- b) adopt or develop an appropriate code of conduct, and to ensure this is embedded within their organisation,*
- c) 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.'*

29. There are also requirements that these documents will be kept up to date and fit for purpose and made accessible to tenants.

30. In reference to part a) above, NFDC has a corporate Learning and Development Policy which covers the Councils approach to Learning and Development and outlines a commitment to fostering a culture of continuous learning. It explains how learning and development needs can be identified, different methods of learning, how it may be funded and approved and potentially repaid and what time off can be expected.

31. The corporate 'Growth and Goals' conversations, which replaced annual reviews and 1:1s, puts a focus on reflection, past achievements and how this can aid future development and growth.

32. What is missing from these is a real sense of how these corporate processes interact with housing specific roles and relate to the requirements as set out in the Consumer Standards. Tenants have also not had a valid opportunity to scrutinise or influence the development of these documents or processes. It is proposed that a housing specific Learning and Development Procedure will be developed with tenants that will link with the Consumer Standards and sit alongside and incorporate the corporate procedures already in place.

33. In reference to part b) above, NFDC has various Codes of Conduct in operation which relate to confidentiality and general conduct, but none appropriate in this context.

34. The corporate NFDC employee behaviours framework begins to cover the behavioural elements of the Competence and Conduct requirements. These ensure, as an organisation, we have behaviour commitments that bring our values to life. They were also mapped against the Chartered Institute of Housings professional standards. However, the expectations of the Competence and Conduct requirements are such that a specific agreement between tenants and representatives of NFDC setting out the behaviour and specific actions expected when working within tenants' homes and communities is needed.
35. The plan is to incorporate the existing corporate behaviours framework and add a housing specific element. Ensuring, as is explicitly stated in the requirements, tenants are given meaningful opportunities to influence and scrutinise the development of, and final version of, any document. This will include involved tenant consultation, focus groups of tenants and staff, digital consultation via Go Vocal using Hometalk to also promote to the wider tenant population.

Working with service providers

36. While NFDC is in a reasonably comfortable position with the Direct Line Organisation managed within the housing service undertaking most of the property services, there are a number of external service providers the Council employees to carry out some works. Further work is planned to fully understand the Competence and Conduct requirements in relation to external service providers. For example, ensuring there are mechanisms in place that checks they are aware of the appropriate behaviours.

Corporate plan priorities

37. Priority 3: Meeting Housing Needs – particularly in relation to working with our housing tenants to understand their needs and provide high quality service standards in line with the government's new Social Housing Charter and regulatory regime.

Consultation undertaken.

38. We understand that tenant consultation should be factored into any service investment however, the Competence and Conduct requirements are explicit that tenants have meaningful opportunities to influence and scrutinise decisions relating to the adoption or development of the code of conduct and learning and development policy.

39. Consultation with tenants and staff has been factored into the development process as outlined in the report above.

Financial and resource implications

40. Any expenditure required by the proposed action plan will be met from existing budgets within the Housing Revenue Account (HRA) and have already been factored in the draft 30-year business plan.

41. Failure to raise standards, meet the regulatory requirements of the consumer standards and respond appropriately to complaints could lead to fines and compensation levied by the Housing Ombudsman, the Local Government and Social Care Ombudsman or the Regulator of Social Housing.

42. There are significant financial demands on the service in relation to preparedness for the introduction the Competence and Conduct requirements, particularly in relation to the enrolment of relevant managers on the mandatory qualification. This has been factored into budget planning.

Legal implications

43. The Regulator of Social Housing launched its regulatory framework on the 1 April 2024 which outlines our requirements as a social housing provider including compliance with its consumer standards.

Risk assessment

44. This report gives assurance that NFDC is in a good position in the preparedness planning for the upcoming Competence and Conduct requirements of the Consumer Standards.

Environmental / Climate and nature implications

45. Whilst the report has no direct implications, the work of NFDC will include improving the energy efficiency of our local housing stock, providing better services on our estates, including open spaces, and the positive contribution to neighbourhoods.

Equalities implications

46. The Consumer Standards are likely to have a positive impact on NFDC tenants as there is a requirement under the Transparency, Influence and Accountability standard for landlords to 'understand the diverse needs' of tenants, including those arising from protected characteristics, language barriers, and additional support needs and assess whether all tenants have fair access to, and equitable outcomes of, housing and landlord services.

47. An Equality Impact Assessment has been completed in relation to the introduction of the Competence and Conduct requirements, looking specifically at the introduction of the Code of Conduct element.
48. The need for consideration to be made around using different methods of communication and engagement for wider consultation should be considered. This has been factored into the plan with face to face discussions with the Tenant Involvement Group, face to face focus groups including tenants and staff, with the option to engage digitally if preferred to be considered, and a wider consultation digitally, promoted via the tenant magazine Hometalk.

Crime and disorder implications

49. It is anticipated there will be potential indirect and direct positive impacts on the Council's tenants and neighbourhoods. The interventions proposed through our improvement to tackling Anti-Social Behaviour as part of the consumer standards is likely to lead to an initial increase in the number of cases prosecuted in the courts, or by the Police, whilst long term interventions proposed should lead to a long-term reduction in crime and disorder.

Data protection / Information governance / ICT implications

50. The collection, retention and deletion of tenant data is governed by GDPR and associated guidance. All data will be collected and maintained in line with the required legislation. The Policies are required in the shorter-term at a service level to improve service delivery and outcomes. Once the service plan is fully adopted the policies will be updated in line with any changes required and will be continuously reviewed.

New Forest National Park / Cranborne Chase National Landscape implications

51. The approach of ensuring the Housing Service is fully compliant with the consumer standards including for housing neighbourhoods as well as home may involve increased and better partnership working with the National Park Authority where the Council's housing stock is also located and managed by the housing landlord.

Conclusion

52. NFDC is generally well-prepared for the Competence & Conduct requirements (coming into force Oct 2026). The Council has already carried out a self-assessment, analysed gaps, and begun implementing improvements ahead of final confirmation of the regulatory changes.

53. Mandatory qualification requirements are on track for full compliance ahead of the October 2029 deadline. Team managers are also being supported to complete Level 4 qualifications, ensuring the service exceeds minimum requirements.
54. Key policy and framework development is required to meet the broader Competence & Conduct Standard. Two essential documents need to be developed with meaningful tenant involvement (a core regulatory expectation):
- A Housing Learning and Development Procedure (to supplement corporate processes and link them directly to the Consumer Standards).
 - A Housing-specific Code of Conduct, incorporating behavioural expectations for staff and service providers when working with tenants and in homes.
55. Tenant influence is fundamental, and NFDC is embedding this into policy development. The standard requires tenants to meaningfully scrutinise and influence both the Learning and Development Procedure and Code of Conduct.
56. Overall conclusion: NFDC is in a strong position but must now focus on the tenant-influenced documents needed for full compliance.
57. The next major milestone will be the September 2026 report, which will present:
- Final versions of the Learning & Development Procedure
 - Final versions of the Housing Code of Conduct
 - and information on how external contractors and service providers are involved in the introduction of these new documents.
 - Evidence of tenant involvement and scrutiny
 - Progress updates on qualification completion
 - And further information as to how the wider staffing Knowledge, skills and behaviours are being mapped and evidenced.

Appendices:

None.

Background Papers:

Regulator of Social Housing
Consumer Standards
January 2025 report to HACOSP
March 2025 report to HACOSP