



Competence and Conduct Standard for social housing

G15 response

April 2024



About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 850,000 homes across the country, including around one in ten homes for Londoners. Delivering good quality safe homes for our residents is our number one priority. Last year our members invested almost £1.5bn in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Sovereign Network Group
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing

For more information, please contact: G15@lqgroup.org.uk



Executive Summary

We welcome the intent behind these proposals and are committed to ensuring that our people have the skills and behaviours to carry out their jobs to the best of their ability. Like the government, we hope that ‘professionalising’ social housing will bolster its reputation as an industry and career choice, helping us to attract and retain talented and committed staff who can deliver better homes and services for residents.

Having said this, these proposals should not be viewed as a silver bullet. The vast majority of people who work in social housing do so for the right reasons – because they believe in its power to improve residents’ lives for the better. But respect and emotional intelligence can’t always be taught in a classroom – across the sector, we know qualifications have not necessarily prevented poor practice.

That’s why we think it is crucial that the sector gets the opportunity to engage with the government and course providers to ensure qualifications genuinely add value and can live up to their aims. We want qualifications to be used to ensure all staff show care and compassion to all residents, at all times.

There’s a risk that these proposals will be implemented in a way that takes a ‘one size fits all’ approach to housing management. A broad range of functions is included in scope – rightly so. But those responsible for gas safety compliance require a very different skillset to those managing anti-social behaviour. It’s important that thought is given to how these proposals can support a range of courses that help people to develop relevant technical expertise alongside a core set of professional values. We’d urge DLUHC to review the wording of the proposals to ensure a range of bodies including CIOB, RICS and ILM – not just the CIH – are able to provide qualifications.

These proposals may harm our ability to recruit staff from outside the sector, especially at the ‘senior housing executive’ level. Similarly, they could prevent us from promoting certain (underrepresented) groups of staff, for instance those with caring responsibilities. Although we agree that all roles in scope need to be staffed by people with a good grasp of social housing management, performing effectively is about values, ethics and leadership as well as knowledge, especially at a senior level. We’d encourage DLUHC to consider whether deterring otherwise excellent candidates who don’t happen to have a background in housing, or who may not have capacity to complete a qualification, is the correct approach.

We are very concerned that our members have reached a wide range of estimates for the number of roles in scope for mandatory qualifications, even accounting for differing organisational size and structure. DLUHC needs to engage with the sector to provide clearer guidance that can ensure a consistent approach is taken. Where members’ estimates of the number of roles in scope are at the upper end, they are more concerned about the financial and opportunity cost of these measures and their ability to deliver the proposals within the timeframe. Accordingly, if this revised guidance suggests that more roles are in scope than members’ impact assessments (submitted individually) currently estimate, we may support introducing measures to reduce the impact of the proposals, for example, not applying them retrospectively, or having an experienced assessment route.

Responses to consultation questions

- 1. Do you agree with the content of the direction to setting the broad Standard relating to the competence and conduct of all social housing staff?**

Yes.

- 2. Do you agree that only individuals who have a substantive role in managing delivery of housing management services should be in scope of the qualification requirements?**

Yes.

G15 members want all their staff to receive training and development that supports them to carry out their roles as effectively as possible.

We agree that the approach of only requiring managers to complete qualifications is the right one, although if this proposal is to have the desired effect, it's crucial that serious thought is put into the content of the qualifications and the scope of the qualifications accepted.

A positive side effect of this requirement is likely to be that landlords will choose to offer staff not within the Standard's scope the opportunity to take qualifications to build a talent pipeline. Many members already take this approach. We think incentivising rather than requiring landlords to take this approach to the development of more junior staff is sensible, as it will allow landlords to balance staff development with other factors including cost and capacity.

- 3. Do you agree with the guidance on the scope of housing management services?**

Whilst we don't have any material disagreement with the guidance, we are lacking clarity on who is in scope to the point where estimates amongst G15 members vary substantially. We'd welcome further guidance that includes examples and case studies. For example, the Regulator of Social Housing could produce a similar set of guidance to the Code of Practice which accompanies the Consumer Standards, detailing how providers should uphold the requirements.

There is a risk that setting such a broad scope leads to a 'one size fits all' approach. We wholeheartedly agree that there are a core set of skills and behaviours that all senior social landlord staff should hold. However, these proposals include a range of functions, some of which require specific technical skills, for instance relating to surveying, or building safety. It's already difficult to recruit and retain staff with these technical skills – the process of 'topping up' qualifications should be made as straightforward and robust as possible to ensure the sector is still able to attract these sought-after individuals.

- 4. In addition to the definitions within legislation, does the guidance on which functions will be in scope provide sufficient clarity to enable you to assess which individuals within your organisation will need to gain a qualification?**

No.

There is a significant amount of variation in terms of the number of roles estimated to be in scope across the G15. Some of this variation will be down to different organisational structures, but it may also indicate that members are interpreting the guidance differently. We'd welcome clarity over whether this level of variation is something that DLUHC were anticipating based on their earlier engagement with the sector. If it is not, we'd welcome an

update to the guidance to address any inconsistencies as early as possible to allow the sector to prepare for the introduction of the requirements in a timely manner.

5. Are there any other functions not listed above which should be in scope?

No.

6. Are there any functions listed above that you think should not be in scope?

No, provided that there is sufficient variation in the content of qualifications to add value to the range of functions that are in scope.

As outlined in our response to question 3, we agree there should be a core set of values and behaviours that all housing professionals should hold. These could be embedded within a broader range of courses which provide different functions with the technical know-how to conduct their jobs effectively.

We're also concerned that the scope of qualifications permitted is so narrow that technical or leadership courses will not be meet the Standard. The CIH may be the most appropriate awarding body for some functions (e.g. complaints, housing management), but we believe other bodies e.g. RICS, ILM or CIOB should also be supported to certify courses.

7. Does the section relating to exemptions provide sufficient clarity to help you assess which individuals within your organisation will not be in scope of the qualification requirement?

Yes.

However, we are concerned about the impact these proposals could have on underrepresented groups or groups with protected characteristics. In particular, we think colleagues who have recently returned from maternity/paternity leave, who work part time, who have caring responsibilities, or who are close to retirement age, may be less likely to have the capacity to take qualifications. Any measures that could harm our ability to promote a diverse workforce that is representative of our resident base should be considered very carefully.

In order to prevent a disproportionate and unfair impact on the groups outlined above, DLUHC could consider a blanket extension of the transition period for (some of) these groups, or make provisions for an experienced assessment route, similar to what is currently available for the CIPD.

8. Do you agree with the proposal that individuals must have been in their role for more than 6 months to be classed as a Relevant Person or Relevant SP Manager (except where they are subject to a probationary period)?

Yes.

9. Do you agree with the proposal that those staff who have a probation period should have, or be working towards, a qualification within 9 months from the point at which they take up their role?

Yes. Members should not be required to invest thousands of pounds in qualifications before employees have passed their probation period (which typically last 6 months).

10. Do you agree with our proposal that unpaid volunteers should not be required to gain a relevant qualification?

Yes.



11. Do you assess that any of your unpaid volunteers undertake roles which meet the criteria set out above?

No.

12. Do you agree that a level 4 qualification is the correct level for a senior housing manager and individual who is a services provider?

No.

Whilst we agree that level 4 is the appropriate level, we strongly urge DLUHC reconsider the requirement for courses to contain a qualification element in order to be eligible. If courses contain the required content, are at the right level, and are Ofqual regulated, then they should be included.

Apprenticeships, which do not necessarily contain a qualification element, are widely used across the sector. We believe they would be equally effective in meeting the aims of the Standard.

Crucially, apprenticeships can be funded via the Apprenticeship Levy, meaning level 4 qualifications (depending on the size of an organisation) would come at little to no extra financial cost.

13. Do you agree that a level 5 qualification or a foundation degree is the correct level for a senior housing executive?

Yes.

We agree that senior housing executives should be required to hold a more advanced qualification than senior housing managers. In many cases, this may be a level 5 qualification (or above).

However, without robust and permanent arrangements for 'topping up' partially compliant qualifications, we are concerned this proposal could harm our ability to recruit senior executives from outside of the housing sector, or from international backgrounds. A senior housing executive who doesn't hold any housing-management related qualifications but does have relevant job related skills and experience, would have to spend the first 3 years of their job studying to pass both level 4 and level 5 qualifications (assuming, as is currently the case, that holding a level 4 qualification is an entry requirement of studying for a level 5 qualification). This is likely to act as a barrier to recruitment on both the candidate and employer's side.

Whilst recognising the benefits of qualifications, our experience is that candidates without a background in housing management can still hold the qualities required to perform effectively at a senior or executive level. Ethical practices, meeting the diverse needs of residents, respectful customer service and leadership are not skills limited to those who have completed housing qualifications.

We therefore encourage DLUHC to consider what effect these proposals will have on recruitment of talented individuals from outside of the sector to senior roles, and whether this will ultimately have a detrimental impact on the services that residents receive.

This risk could be mitigated by allowing for a broader ranges of courses in the scope, including different subjects and qualification types (apprenticeships, certifications etc).

Additionally, we suggest that DLUHC consider an experience-based assessment approach to meeting the competence and conduct requirements, that permits exceptionally experienced candidates who don't hold housing qualifications to meet the Standard's requirements.

14. Do you agree with our proposals that qualifications can be regulated by an equivalent body to Ofqual or a predecessor body?

Yes. To ensure qualifications add value, they must be appropriately regulated. Our members anticipate funding most of these qualifications via the Apprenticeship Levy, so we would seek to use Ofqual-regulated qualifications anyway.

15. Do you agree that the criteria that qualifications must meet is appropriate for ensuring senior housing managers and senior housing executives gain the skills, knowledge, experience and behaviours they need to deliver high quality and professional services to tenants?

On the whole, we agree with the criteria DLUHC have suggested. Our members already use behavioural frameworks to recruit and train staff based on similar criteria.

However, it is critical that the sector can engage with a range of qualifications and providers to ensure that their courses add value. Courses shouldn't just be about filling knowledge gaps – they need to support staff to hold (or develop) the emotional intelligence and respect required to do their jobs effectively, and (for leadership positions), to inspire others to do the same. We'd like to see evidence that qualification providers are engaging with best practice around this outside of housing, for instance in the care and support, social work or healthcare sectors.

In some roles, technical or leadership skills will also be vital. We therefore encourage DLUHC to widen the scope to ensure that a range of specialist training providers can provide courses that meet the criteria. Housing management is not a specific discipline, but one that (as the list of functions in scope attests to) covers a broad range of areas, many of which have their own set of technical skills. Numerous providers, including the CIH, CIOB, RICS, IRPM and the ILM may be able to provide qualifications (and continued professional development) that are tailored to the specific needs of the range of roles in scope.

16. Does section 3.2 of the policy statement provide sufficient guidance to allow to you to identify which qualifications would meet the requirements for a senior housing manager and senior housing executive?

No.

We would appreciate further guidance on whether qualifications not explicitly branded as 'housing management' but that cover the required content are eligible. Based on currently available qualifications, these proposals are likely to mean that only CIH courses will meet the required standard.

We believe not including a broader range of qualifications would be a missed opportunity to support staff to develop the values and behaviours that the criteria rightly promotes, in the context of a more specific technical discipline that is relevant to their role. It could also have an adverse effect on our ability to recruit and retain staff with technical skills.

17. Do you agree with our approach to defining what it means to be 'working towards' a relevant qualification?

In part.

However, we think that the arrangements for 'topping up' partially compliant qualifications should be made permanent, to enable the sector to recruit staff more easily who don't have a background in housing but who can demonstrate translatable skills from working in a similar customer- or public-facing area, for example the charitable, voluntary or customer service sectors.

18. Does the information provided above and within Chapter 1 and Chapter 6 paragraph 44b of the policy statement provide sufficient clarity to help you understand the circumstances in which individuals in scope will be deemed to be 'working towards' a qualification?

Yes.

19. Considering the costs and benefits outlined within the impact assessment, do you agree that all existing staff within the sector should have, or should begin working towards a relevant qualification within 24 months?

No.

We think the transitional period should be longer. We are sceptical that the benefits outlined in the impact assessment will be felt immediately, given the gradual nature of culture change. We therefore think there will be limited benefit to pushing through these requirements as quickly as possible, but significant downside.

Without exception, G15 members are working to improve performance across the metrics that DLUHC outline as the benefits of these proposals (complaints, repairs, arrears, ASB). Other bodies, including DLUHC, the Regulator of Social Housing, and the Housing Ombudsman are also working with landlords to improve their performance in these areas. Activity around these areas is unlikely to slow over the next two years. Therefore, we believe the negative effects of a capacity reduction of 10-20% for the senior staff responsible for delivering these improvements is likely to outweigh the benefits of having all staff compliant by 2027, versus 2028 (or later).

Alternatively, instead of a blanket extension, landlords could complete assessments of the number of their staff who need to take qualifications and what impact their absence would have on service delivery, and then devise an orderly transition plan tailored to their individual circumstances. This could then be scrutinised by the Regulator of Social Housing.

20. Do you have any additional comments or evidence about the potential impact of the policy proposals as assessed in our impact assessment?

As outlined in our response to question 4, we are concerned about the impact assessment's estimates for the number of staff in scope. Our members have reached varying conclusions about how high this figure should be based on the policy statement's guidance (even accounting for different sizes and structures). Although we have also found that 8% is roughly the average figure for the number of staff in scope, there is significant variation on either side of this number. We'd welcome confirmation as to whether this is intended.

We'd also welcome further guidance from DLUHC informed by the feedback it receives on the impact assessment from this consultation. Our members will be responding to the impact assessment questions separately to avoid confusion.

We suggest that DLUHC consider in more detail the potential impact its proposals may have on groups with protected characteristics. We are concerned that certain employees, for

instance those close to retirement age and those who have recently returned from maternity/paternity leave or with other caring responsibilities, may not have the capacity to take qualifications. This could harm our ability to build a more diverse and representative workforce, especially at senior levels.

21. Does the information provided above and in section 4.1 of the policy statement provide sufficient clarity on the time limits within which individuals will need to hold or be working towards a relevant qualification within the transition period?

Yes.

22. Considering the total number of staff in the sector that will need to enrol on qualifications within the transition period as outlined in the impact assessment, and noting that our intention is for the Standard to come into force in April 2025, do you believe that you can meet the demand for enrolling learners on qualifications within the 24 month transition period?

This depends on a landlord's assessment of the number of roles in scope. Requiring landlords to comply within 24 months is likely to have a detrimental effect on service delivery.

23. Do you agree with the proposal that an adjusted transition period (twice the amount of time) should apply to registered providers which provide fewer than 50 units of stock, and will also apply in relation to their services providers?

Yes.

24. Do you agree with our proposal as outlined above and described in section 3.6 of the Policy Statement that there should be transitional arrangements in place for those with partially relevant qualifications (which meet or exceed the requirements in section 3.1 of the policy statement, but do not meet all the course content criteria in section 3.2)?

Yes, and it is crucial that these arrangements are robust and take into account the broad range of relevant qualifications held across the sector.

We would welcome further clarity around how colleagues can check and confirm the course content of qualifications they completed decades ago.

We also believe there is no reason why these arrangements cannot be made permanent, to make it easier for people with partially relevant qualifications to bring their skills and perspectives into the housing sector. This would prevent duplication and deliver financial and capacity savings, as it would not require colleagues who are already expected to hold other professional qualifications for their roles (e.g. Chartered Surveyors) to take multiple (potentially overlapping) qualifications.

25. (For qualification providers only) Where your course does not cover all the criteria listed above, do you plan to update your qualifications to ensure that you cover the proposed course content requirements?

N/A

26. Do you agree with our proposal as outlined above and described in section 3.7 of the policy statement that there should be transitional arrangements in place for those who have completed an apprenticeship programme without a qualification element provided they meet other criteria (as above)?



No.

We think that the 'transitional' arrangements should be made permanent. Ofqual-regulated apprenticeships at the required level covering the required content are as robust as qualifications and should always be eligible under the Standard.

27. Having read the information provided above and in Chapter 6 of the policy statement, are you clear on what your responsibilities are in relation to Relevant SP Managers?

Yes.

28. Based on the information provided in section 6.1 and Annex B2 of the policy statement, are you clear on what would classify someone as a Relevant SP Manager?

Yes.