TUNTUM HOUSING ASSOCIATION

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Customer facing:	Yes	

Competence and Conduct Policy

1. Policy Statement

Tuntum Housing Association is committed to delivering safe, respectful, inclusive and high-quality services to our customers. This depends on colleagues having the necessary knowledge, skills, experience, judgement and professional behaviours to carry out their roles effectively.

This policy sets out how Tuntum will ensure that colleagues involved in the management and delivery of social housing services:

- demonstrate the competence, professional conduct and behaviours expected in their roles, including when interacting with customers and colleagues;
- receive appropriate induction, learning and ongoing professional development;
- have their performance, conduct and development regularly reviewed, with support provided to address identified gaps;
- meet applicable professional qualification requirements; and
- contribute to a culture in which customers are respected, listened to and able to influence the services they receive.

The policy also establishes how Tuntum obtains assurance of the competence and conduct of those delivering relevant services on its behalf.

It supports compliance with the Regulator of Social Housing's Competence and Conduct Standard, effective from 1 October 2026, and the wider Consumer Standards, including the Safety and Quality, Transparency, Influence and Accountability, Neighbourhood and Community, and Tenancy Standards.

Tuntum will apply this policy fairly and make reasonable adjustments where appropriate to ensure employees with disabilities or other relevant needs are not disadvantaged.

2. Our Approach to Competence and Conduct

At Tuntum, our approach to competence and conduct is underpinned by our organisational values, Behavioural Framework and commitment to delivering safe, respectful and high-quality services to our customers.

We recognise that how colleagues communicate, behave and exercise professional judgement directly influences customer experience, trust and confidence in the services we provide.

Competence is not simply about completing training or holding a qualification. It brings together knowledge, skills, experience and judgement, while conduct reflects the professional behaviours and standards expected of colleagues in carrying out their responsibilities.

Together, competence and conduct determine not only what we deliver, but how we deliver it.

Knowledge: understanding the legislation, regulation, policies, procedures and professional requirements relevant to the role.

Skills: being able to apply that knowledge effectively.

Experience and judgement: making appropriate decisions, identifying and responding to risk, recognising the limits of individual competence and escalating matters appropriately.

Behaviour: acting professionally, respectfully and consistently with Tuntum's Behavioural Framework.

Competence must therefore be demonstrated through day-to-day practice and outcomes. Evidence may include observed performance, one-to-one discussions, PDRs, probation reviews, casework and service outcomes, audit activity, customer feedback, complaints and compliments, learning records, qualifications and professional judgement.

Tuntum recognises that competence and conduct are influenced by organisational culture, leadership, systems and management practice as well as individual capability. Where these factors contribute to poor service outcomes, Tuntum will address organisational causes as well as any individual learning or performance issues.

3. Scope

This policy applies to relevant staff involved in providing landlord services connected with the management of Tuntum's social housing. Depending on the responsibilities of individual roles, this is likely to include colleagues working within:

- housing and tenancy management;
- income management;
- allocations and lettings;
- anti-social behaviour;
- customer services and complaints;
- customer engagement;
- repairs and maintenance;
- asset and property management;
- compliance and building safety;
- supported housing where housing-management functions are undertaken; and
- management and senior leadership of these services.

People & Culture will maintain a documented Competence and Conduct Scope Register identifying relevant roles across Tuntum. The register will record, where appropriate:

- whether a role is considered relevant staff for the purposes of the Standard;
- whether statutory qualification requirements apply;
- the rationale for inclusion or exclusion;
- qualification status where relevant; and

- the date the assessment was last reviewed.

The Scope Register will be reviewed where organisational structures, roles or service-delivery arrangements materially change and as part of Tuntum's annual Competence and Conduct Assurance Review.

Tuntum may apply elements of this policy more widely where this supports consistent professional standards. Being within the scope of this policy does not automatically mean that a colleague is required to hold a Level 4 or Level 5 housing qualification. Tuntum will therefore maintain separate but connected relevant-staff mapping and qualification-scope assessment.

Tuntum expects all colleagues to demonstrate appropriate competence, professionalism and conduct, while preserving the distinction between the wider organisational expectations and the specific regulatory obligations.

4. Tuntum Behavioural Framework

Tuntum's Behavioural Framework is adopted as Tuntum's Code of Conduct for the purposes of the Competence and Conduct Standard. It applies alongside Tuntum's employment policies, procedures and any professional, statutory or regulatory requirements relevant to individual roles.

The Framework is structured around Tuntum's six values: Trustworthy, Understanding, Nimble, Transparent, Unifying and Motivated. The Framework sets out the positive and negative behavioural indicators associated with each value.

- Trustworthy – professionalism, reliability, respectful customer communication, accountability and consideration of customer interests.
- Understanding – clear communication, active listening, empathy and sensitivity when communicating challenging information.
- Nimble – adapting to change and seeking practical solutions which improve customer experience.
- Transparent – following policies, addressing issues, challenging unethical behaviour, taking ownership and communicating openly.
- Unifying – inclusion, fairness and respect, including challenging discrimination and ensuring different voices are heard.
- Motivated – continuous improvement through goal-setting, feedback, self-assessment, learning and sharing knowledge.

In practice, these behaviours include listening to customers, communicating clearly and respectfully, demonstrating empathy, taking ownership of issues, keeping customers informed and following through on agreed actions. These expectations will be reinforced through management discussions, learning and development, and customer feedback.

The Framework will be embedded through recruitment, induction, probation, 1:1s, PDRs, learning and development and, where necessary, performance or conduct processes. It will be kept under review, accessible to customers and subject to meaningful customer influence and scrutiny alongside this policy.

5. Role-Specific Competence

Tuntum will determine competence requirements according to the responsibilities and risks of individual roles rather than applying a single generic standard. Managers, supported by People & Culture and relevant professional or technical leads, will consider:

- role responsibilities;
- customer contact;
- decision-making authority;
- statutory and regulatory responsibilities;
- technical or specialist knowledge;

- safeguarding responsibilities;
- health and safety and building safety responsibilities;
- professional or qualification requirements;
- management and leadership responsibilities;
- risks associated with poor decisions or performance; and
- the needs and circumstances of customers.

Job descriptions, person specifications, recruitment, induction, probation, development planning and performance management will be used together to establish and maintain competence.

Competence requirements will be reviewed where a role materially changes or where customer feedback, complaints, audit findings, incidents, service failures, regulatory learning or performance information indicate that existing requirements may no longer be sufficient.

The assessment of role-specific competence requirements will inform Tuntum's Competence and Conduct Scope Register, with detailed requirements reflected, as appropriate, within job descriptions, person specifications, induction arrangements and individual development plans.

6. Recruitment and Appointment

Tuntum will seek to appoint people who demonstrate the knowledge, skills, experience, values and behaviours appropriate to their role. Recruitment may include:

- competency and behavioural interview questions;
- assessment of relevant experience;
- technical assessments;
- qualification and professional membership checks;
- references;
- relevant pre-employment checks; and
- DBS checks where appropriate.

Where a candidate can reasonably develop a non-essential skill or area of experience, this may be addressed through induction, probation objectives and development planning. Essential statutory, professional or safety requirements will not be waived.

7. Induction and Probation

All new colleagues will receive an induction appropriate to their role. Alongside Tuntum’s corporate induction, managers are responsible for ensuring appropriate role-specific induction is completed.

This should include relevant legislation and regulation, policies and procedures, systems, customer expectations, safeguarding and safety responsibilities, technical requirements and Tuntum behavioural expectations.

Previous experience alone will not be assumed to demonstrate competence. During probation, managers will assess both what an employee delivers and how they deliver it. Probation outcomes and relevant records will be maintained within PeopleHR or another appropriate organisational system.

8. Learning and Development

Tuntum is committed to continuous professional development. Learning may include:

- mandatory and regulatory training;
- technical learning;
- professional housing qualifications;
- management and leadership development;
- coaching and mentoring;
- peer learning and case reviews;
- shadowing;
- external briefings and professional updates;

- learning from complaints and customer feedback;
- learning following incidents or service failures; and
- self-directed learning.

The behaviours associated with the Motivated value reinforce the expectation that colleagues seek feedback, identify areas for improvement and engage in continuous learning. Completion of training does not automatically demonstrate competence; managers should also consider whether learning is understood and applied in practice.

Training and development records will be maintained through PeopleHR, Tuntum's learning-management arrangements and other appropriate records.

9. Mandatory Training

Tuntum will maintain mandatory training requirements based upon organisational, statutory, regulatory and role-specific needs. People & Culture and relevant leads will monitor completion and provide management information.

Managers are responsible for ensuring their teams complete required learning within the relevant timescale. Failure to complete mandatory learning without reasonable justification may be addressed through the appropriate performance or disciplinary process.

10. Professional Housing Qualifications

Where an individual is assessed as being within scope of the statutory qualification requirements, and no applicable exemption, equivalency or deemed-compliance provision applies, Tuntum will ensure that they hold or are working towards an appropriate qualification in accordance with the Government's Policy Statement on Qualification Requirements for Social Housing.

- Senior Housing Managers will be required to hold or work towards an appropriate Level 4 housing management qualification; and
- Senior Housing Executives will be required to hold or work towards an appropriate Level 5 housing management qualification or qualifying foundation degree.

Tuntum will operate a planned qualification programme during the applicable regulatory transition period. Existing qualifications, relevant higher-level qualifications and any applicable equivalencies will be considered before requiring additional study.

Where an employee is required to undertake a statutory housing qualification, progress will be actively monitored through regular management discussions and PDRs. People & Culture will maintain central oversight of enrolment status, expected timescales, progression, anticipated completion dates, barriers to completion and action required where progress gives cause for concern. This information will contribute to annual Board or Committee assurance.

Tuntum also recognises the value of supporting professional development beyond mandatory qualification requirements. Where appropriate, colleagues may be supported to undertake relevant professional housing qualifications as part of their career development, succession planning or progression aspirations, subject to organisational priorities, available resources and the appropriate approval arrangements.

11. Maintaining Competence and Conduct Through Regular Management

Monthly 1:1s

People Managers are expected to hold a meaningful one-to-one with each direct report at least monthly, unless an alternative frequency has been agreed for a specific and reasonable operational or individual reason. Any ongoing alternative arrangement should be agreed with the relevant manager and recorded. Where timing needs to change because of annual leave, sickness or operational circumstances, the meeting should normally be rearranged rather than omitted.

One-to-ones should provide an opportunity to discuss performance and objectives, workload, wellbeing, customer issues, behaviours, learning and development, barriers to performance, feedback and support required.

One-to-ones should be recorded through PeopleHR, providing an organisational record of completion and supporting management oversight and assurance. The quality of the conversation remains as important as completion of the record.

Performance and Development Reviews

Tuntum's PDR process provides a structured review of performance and development. PDRs will consider achievement against objectives, contribution to organisational and service priorities, demonstration of Tuntum's six behaviours, strengths and areas for development, learning undertaken and how it has been applied, professional development and objectives for the next review period.

PDR records will be maintained through PeopleHR or the agreed organisational process. Where appropriate, calibration will support consistency in the application of performance expectations.

Ongoing Feedback

Managers should not wait for an annual PDR to recognise good performance or address concerns. Feedback should be timely, constructive and clear.

12. People Management Competence and Conduct

Tuntum recognises that good management directly influences employee performance, service quality and customer experience. Tuntum therefore holds quarterly People Managers meetings as a structured forum for building management capability and consistency.

These meetings support managers to:

- develop shared management expectations;
- strengthen practical management skills;
- discuss emerging organisational and people issues;
- understand legal and regulatory developments;
- share learning and good practice;
- identify common development needs;
- consider employee feedback;
- contribute to the development of People & Culture processes and resources; and
- improve consistency across Tuntum.

Tuntum's People Management Standard/objective will complement this policy by establishing common expectations of what employees should reasonably expect from their manager. The Managers Toolkit will provide practical guidance, templates and resources. Management competence will itself be considered through PDRs, one-to-ones, feedback and organisational learning.

13. Customer Experience as Evidence of Competence and Conduct

Customer experience is an important source of evidence about whether Tuntum's services are delivered competently and professionally. This includes how colleagues communicate, demonstrate empathy, respond to concerns, keep customers informed and deliver services safely and effectively.

Evidence may include complaints and compliments, Tenant Satisfaction Measures, surveys, customer engagement and scrutiny, service reviews, case audits and recurring themes from individual cases.

A single expression of dissatisfaction will not automatically be treated as evidence of poor performance. Feedback will be considered proportionately alongside other information to identify patterns, behavioural concerns, communication issues, competence gaps, systemic issues and opportunities for learning or improvement.

14. Customer Influence and Scrutiny

Customers have direct experience of how Tuntum's employees communicate, behave and deliver services. Tuntum will therefore provide meaningful opportunities for customers to influence and scrutinise this policy and decisions relating to the Behavioural Framework/Code of Conduct.

Engagement may include customer panels or focus groups, scrutiny arrangements, surveys, online consultation, existing customer engagement forums and targeted engagement where appropriate. Tuntum will seek to make engagement accessible and inclusive.

Tuntum will maintain evidence of customer involvement, feedback received, how that feedback was considered and any resulting changes. Where appropriate, Tuntum will communicate how customer feedback has influenced the policy and explain why particular suggestions have not been adopted.

Customer engagement will therefore form part of policy development and review rather than simply publication of a completed policy.

15. Addressing Competence and Performance Concerns

Where concerns arise, managers should identify the nature, seriousness and underlying cause. Appropriate support may include clarification of expectations, additional supervision, coaching, refresher or additional training, mentoring or shadowing, structured objectives, a performance improvement plan, more frequent reviews, or review of workload, responsibilities or processes.

Managers should consider whether the concern relates primarily to:

- Capability – lack of knowledge, skill or ability;
- Conduct – failure to meet expected standards or behaviours; or
- Organisational factors – for example unclear expectations, systems, inadequate training or workload pressures.

Some cases may involve more than one factor. Where informal support is insufficient, or where concerns are sufficiently serious, Tuntum may use the appropriate formal capability, disciplinary or other employment process. Tuntum will act fairly and proportionately and consider reasonable adjustments where appropriate.

16. Learning from Mistakes and Service Failure

Tuntum aims to maintain a culture of accountability and learning. Not every mistake will constitute misconduct. Managers should distinguish between an isolated error, a competence or training gap, an unclear process, a systems failure, conflicting or unreasonable expectations, repeated poor performance, deliberate failure to follow requirements, and reckless or inappropriate behaviour.

Where organisational or management factors have contributed to a failure, action should address those factors as well as any individual learning. This reflects the Transparent behaviour of taking ownership of outcomes and addressing issues openly.

17. Raising Concerns About Competence or Conduct

Tuntum encourages colleagues to raise concerns where they believe unsafe, unethical, inappropriate or persistently incompetent practice may affect customers, colleagues or the organisation. Employees should not feel that they must ignore poor practice because it sits outside their own role or team.

Depending on the circumstances, concerns may be raised with:

- the employee's line manager;
- another appropriate manager;
- People & Culture;
- a relevant senior manager; or
- through Tuntum's Whistleblowing arrangements.

Where appropriate, safeguarding, health and safety or other specific reporting arrangements should also be followed. Concerns will be considered proportionately and through the appropriate organisational

process. This expectation supports the Transparent behaviour, including challenging and reporting unethical behaviour and taking ownership of service outcomes.

Customers may raise concerns about the competence or conduct of Tuntum colleagues or service providers through Tuntum's established customer contact and complaints arrangements. Concerns will be considered under the appropriate procedure, and relevant findings or recurring themes will inform learning, management oversight and service improvement.

18. Service Providers, Contractors and Partners

Tuntum remains responsible for regulatory outcomes where landlord services are delivered on its behalf. Where competence and conduct requirements are relevant to a procured service, these requirements should be considered at the specification and procurement stage rather than only after a contract has commenced.

Relevant procurement and contract-management arrangements should make clear the competence, conduct, training, qualification or assurance requirements expected of the service provider where appropriate.

Tuntum will take proportionate steps to obtain assurance that relevant service-provider staff have the necessary skills, knowledge, experience and behaviours. This may include:

- competence requirements within procurement;
- contractual requirements and due diligence;
- qualification and training evidence;
- professional accreditation;
- behavioural expectations;
- contract monitoring;
- customer feedback and complaints;
- performance information;
- audit and quality assurance; and
- remedial action where concerns arise.

Tuntum will maintain an assessment of relevant service-provider arrangements, including identifying where applicable regulatory competence, conduct and professional qualification requirements apply to service providers and their relevant managers.

Where concerns about the competence, conduct, safety or quality of work undertaken by service providers are identified, Tuntum will ensure these are reviewed through the appropriate contract management arrangements and that necessary remedial action is considered.

19. Responsibilities

Board

The Board is responsible for obtaining sufficient assurance that Tuntum is meeting applicable competence and conduct requirements. The Board, or the relevant Committee acting on its behalf, will receive at least annual assurance on both implementation and effectiveness of this policy.

Assurance will consider both activity – for example whether 1:1s, PDRs, training and qualifications have been completed – and outcomes, including customer feedback, complaints, audit findings, service performance and identified competence or conduct risks. Significant concerns or material areas of non-compliance will be escalated outside the annual reporting cycle.

The Board will also demonstrate and promote Tuntum's organisational values and expected standards of professional conduct, supporting a culture in which customers are treated with respect, their views are considered and decisions are informed by their needs and interests.

Chief Executive and Senior Management Team

- champion high professional standards;
- model expected behaviours;
- ensure appropriate resources are available;
- review significant competence risks;
- support organisational development; and
- oversee implementation of this policy.

People & Culture

- own and coordinate this policy;
- maintain oversight of relevant-staff mapping and the Scope Register;
- coordinate qualification-scope assessments;
- advise managers on competence, performance and conduct;
- support recruitment, induction, PDR and development processes;
- monitor relevant workforce assurance information;
- coordinate management development; and
- support policy review and organisational learning.

People Managers

- understand the competence requirements of roles within their teams;
- provide appropriate induction;
- hold and record monthly 1:1s;
- complete PDRs;
- provide timely feedback;
- assess both performance and behaviour;
- identify development needs;
- monitor mandatory learning;
- address concerns promptly;
- recognise good performance;
- model Tuntum's Behavioural Framework; and
- escalate significant risks.

Employees

- carry out their role within their competence;
- follow relevant policies and procedures;
- demonstrate the Tuntum Behavioural Framework;
- maintain professional standards;
- complete required learning;
- participate meaningfully in 1:1s and PDRs;
- keep their knowledge up to date;
- undertake required qualifications where applicable;
- seek support where they are unsure of their competence;
- act on reasonable feedback; and
- raise concerns regarding unsafe, unethical or poor practice.

20. Assurance and Evidence

A proportionate set of key assurance measures will be agreed and maintained to support annual reporting to the Board or relevant Committee. These will include, as appropriate, workforce competence and conduct indicators, compliance with mandatory learning and qualification requirements, performance and development activity, customer experience, identified risks and evidence of organisational learning and improvement.

Evidence may include:

- relevant-staff mapping;
- qualification-scope assessments;
- qualification and CPD records;
- mandatory training information;
- induction and probation records;
- PDR completion;
- monthly 1:1 completion;
- development plans;
- performance-management information;
- audits and case reviews;
- complaints and customer-feedback themes;
- service-provider assurance;
- customer consultation and scrutiny evidence;
- management-development activity; and
- actions arising from service failures or regulatory reviews.

People & Culture will coordinate an annual Competence and Conduct Assurance Review. The review will consider whether relevant roles remain correctly identified, progress against qualification requirements, mandatory learning compliance, PDR and 1:1 completion, management capability and development themes, relevant customer feedback and complaints, service-provider assurance, significant competence or conduct risks, development priorities and whether this policy and the Behavioural Framework remain fit for purpose.

The annual review will also consider recurring themes and opportunities for organisational learning, including whether learning identified through customer feedback, complaints, audits, incidents and service failures has resulted in improvements to training, management practices, systems or service delivery.

21. Equality, Diversity and Inclusion

Tuntum will apply this policy fairly and consistently. Competence includes understanding and responding appropriately to the diverse needs of our customers.

The Unifying behaviour requires colleagues to respect diversity, ensure voices are heard, use inclusive language, challenge discrimination and treat customers and colleagues fairly. Learning, assessment and qualification arrangements will take account of reasonable adjustments where appropriate.

Role-specific competence requirements will, where relevant, include the ability to recognise and respond appropriately to customers' diverse needs and to understand where the way services are delivered may result in different or disproportionate impacts for particular groups.

Tuntum also recognises that colleagues may have different learning needs and may require different approaches to developing and demonstrating competence. Learning, assessment and professional qualification arrangements will take account of individual circumstances, accessibility requirements and reasonable adjustments where appropriate, while maintaining the standards of competence and conduct required for the role.

22. Accessibility and Publication

This policy and Tuntum's Behavioural Framework/Code of Conduct will be accessible to customers. Tuntum will provide clear, accessible information explaining the standards customers can expect, with alternative formats, including large print, and reasonable communication adjustments available where required. The documents will be publicised through appropriate customer communication channels.

23. Review

This policy will initially be reviewed annually while the Competence and Conduct Standard is being embedded. An earlier review may take place where legislation or regulation changes, Government or Regulator of Social Housing guidance changes, Tuntum's structure or relevant roles materially change, customer consultation or scrutiny identifies a need for change, audit or assurance identifies a weakness, a significant service failure identifies relevant learning, or operational experience indicates that the policy is no longer fit for purpose.

Tuntum's Behavioural Framework will also be kept under review. Customers will be provided with meaningful opportunities to influence and scrutinise substantive reviews of both documents.

24. Related Documents and References

- Tuntum Behavioural Framework
- Staff Handbook
- Recruitment and Selection arrangements
- Induction and Probation arrangements
- One-to-One framework
- Performance and Development Review process
- Learning and Development arrangements
- Managers Toolkit
- Capability / Performance Management arrangements
- Disciplinary Policy
- Equality, Diversity and Inclusion Policy
- Complaints Policy
- Customer Engagement / Involvement arrangements
- Safeguarding policies
- Whistleblowing Policy
- Procurement and Contract Management arrangements