Competency & Conduct Policy

Policy owner	Sam Taylor – HSH Operations Manager
Confidentiality	C1
Distribution list	HSH Operational Staff, HSH Board of Trustees, HSH Tenants
Sign off date / version	23/09/2026 V1

1. Overview

Hawes Street Housing is committed to providing safe, ethical, high-quality and person-centred housing services. We strive to operate with professionalism, integrity, respect, accountability and compassion in all aspects of our work to ensure the rights, dignity, wellbeing and independence of residents are always promoted and respected.

HSH is committed to maintaining high standards of competence, conduct and professionalism in the delivery of its housing and support services. We recognise that skilled, knowledgeable and accountable staff are fundamental to providing safe, effective and resident-focussed services.

All employees, volunteers and anyone acting on behalf of HSH are expected to conduct themselves in a manner that reflects our values and supports a positive, inclusive and safe environment for residents, customers, colleagues, partners and stakeholders.

This policy establishes the standards of behaviours expected in all HSH services and outlines the organisation's commitment to ensure that staff hold the appropriate competencies for their roles. It supports compliance with the Regulator of Social Housing (RSH) Competency & Conduct Standard and other relevant legal, regulatory and professional obligations.

2. Policy Scope

This policy applies to all staff representing HSH, including:

- Trustees & Board Members
- Employees at all levels
- Volunteers
- Agency workers
- Contractors and consultants
- Anyone representing the organisation

3. Regulatory and Legal Framework

This policy complies with HSH's duties under the following legislation:

- Housing Act 1996
- Housing and Regeneration Act 2008
- Social Housing Regulation Act 2023

- Regulator of Social Housing Consumer Standards
    - Transparency, Influence & Accountability Standard – requires registered providers to treat tenants with fairness and respect, listen to tenant concerns and complaints and enable tenant influence.
    - Safety & Quality Standard – requires registered providers to provide safe and effectively managed homes or a suitable standard.
    - Competency & Conduct Standard – requires registered providers to ensure staff have the appropriate skills, knowledge and behaviours, including professional qualifications where required, and adopt a code of conduct for staff.
- Care Act 2014
- Equality Act 2010
- Health and Safety at Work Act 1974
- Data Protection Act 2028 & UK GDPR
- Safeguarding Vulnerable Groups Act 2006

4. Core Principles of Conduct

All individuals working for, or on behalf of HSH are expected to uphold the following core principles of conduct at all times:

- **Respect** – treat all people with dignity, fairness, courtesy and compassion
- **Integrity** – act honestly, ethically and transparently in all dealings and decisions
- **Professionalism** – maintain high standards of conduct, competence and professional practice
- **Accountability** – take responsibility for actions, decisions and their impact on others
- **Safety** – promote and maintain a safe environment, safeguarding residents, colleagues and others from harm
- **Confidentiality** – respect privacy and protect personal, sensitive and organisational information
- **Inclusivity** – promote equality, value diversity, challenge discrimination and support inclusive practice
- **Professional boundaries** – maintain appropriate, safe and professional relationships at all times
- **Compliance** – follow all applicable policies, procedures, legislation, regulatory requirements and professional standards
- **Speaking Up** – raise concerns promptly where there is misconduct, wrongdoing, risk or unsafe practice
- **Reputation** – behave in a manner that upholds and protects the reputation, values and objectives of the organisation
- **Ethics** – act fairly and make decisions by consistently applying HSH's values
- **Skills** – equip with relevant skills to deliver effective services to residents, colleagues and partners
- **Leadership –** demonstrate leadership, be forward thinking, create opportunities and find solutions for residents to improve outcomes

5. Professional Standards of Behaviour

All Individuals working for, or on behalf of HSH are expected to demonstrate the highest standards of professional conduct and behaviour at all times.

Individuals must:

- **Act in a resident's best interests** – prioritise safety, wellbeing, dignity, rights and independence
- **Treat others with respect** – act with courtesy, fairness, compassion and professionalism and value diversity and individual differences

- **Communicate appropriately** – use clear, respectful and inclusive language and listen to and consider the views of others
- **Follow safeguarding procedures** – identify, respond to, and report concerns immediately
- **Promote equality, diversity and inclusion** – treat people fairly, challenge discrimination and ensure services are accessible and inclusive
- **Act with honesty and integrity** – be truthful in communications and records, declare mistakes, conflicts of interest or concerns and use organisational resources responsibly
- **Maintain professional boundaries** – develop safe, appropriate and professional relationships with residents, colleagues and stakeholders
- **Work within roles, authority and competence** – seek guidance, support or training where necessary
- **Maintain accurate records** – keep clear, accurate and timely records in compliance with organisational, legal and regulatory requirements
- **Use Information and digital systems responsibly** – protect confidentiality, privacy and data security in accordance with GDPR and organisational policies
- **Raise concerns and report wrongdoing** – report misconduct, unsafe practice, fraud or any risk to residents, colleagues or the organisation
- **Co-operate with investigations, audits and reviews** – contribute to a culture of learning and continuous improvement.
- **Protect the reputation of HSH** – ensure that conduct reflects the organisations values and standards

Individuals must not:

- **Abuse, neglect or exploit others** – any action or omission that causes harm, distress, neglect, abuse, exploitation or improper treatment of residents or others
- **Develop inappropriate relationships** – enter into any personal, sexual, financial or overly familiar relationships that compromise professional boundaries or impartiality
- **Use unauthorised restraint** – apply physical intervention or restraint unless lawful, necessary and justified
- **Misuse authority or position** – abuse a position of trust, authority, influence, organisational resources or power imbalance for personal gain or advantage
- **Discriminate, harass or victimise** – engage in bullying, harassment, intimidation, victimisation, discriminatory behaviour or the use of offensive, abusive or threatening language or conduct
- **Use violence, threats or coercion** – engage in any behaviour that causes fear, harm intimidation or undue pressure
- **Mismanage information or records** – falsify, conceal, alter, withhold, misuse or improperly disclose information, records or confidential data
- **Act dishonestly or fraudulently** – engage in theft, fraud, deception, misrepresentation, corruption or any misuse of organisational resources
- **Misuse alcohol or drugs** – use alcohol or illegal drugs at work or attend work under the influence of any substance that impairs performance, judgement or safety
- **Accept gifts, payments, loans or other benefits** – accept anything from residents that could create a conflict of interest or compromise professional judgement
- **Compromise safety or reputation** – act in a manner that places residents, colleagues, stakeholders or the organisation at risk of harm, or that could undermine public trust and confidence in HSH.

6. Professional Boundaries

Individuals must maintain clear, appropriate and professional boundaries at all times to protect residents, themselves and the integrity of the service.

Individuals must:

- **Maintain professional relationships** – ensure all interactions with residents are safe, respectful, impartial and focused on their support needs
- **Use professional judgement** – recognise, avoid and appropriately manage situations that may compromise professional boundaries or create conflicts of interest
- **Communicate appropriately** – use approved communication channels only and maintain a clear separation between personal and professional relationships
- **Protect professional integrity** – follow organisational procedures relating to gifts, hospitality, self-disclosure and other situations that may influence, or be perceived to influence professional judgement
- **Raise concerns promptly** – seek advice and report any actual or potential boundary issues, inappropriate relationships or conduct that may place residents, colleagues or the organisation at risk

Individuals must not:

- **Develop inappropriate relationships** – personal, financial or intimate relationships with residents
- **Become financially involved with residents** – do not borrow from, lend to, or engage in any financial transactions with residents
- **Accept inappropriate gifts or favours** – do not accept money, valuable gifts, loans or favours that could create a conflict of interest or compromise professional judgement
- **Share personal contact details** – do not provide residents with personal telephone numbers, email addresses, social media accounts or private messaging details
- **Misuse position or authority** – never exploit a position of trust, authority, influence or any power imbalance for personal benefit
- **Breach physical boundaries** – do not engage in physical contact with residents unless necessary for safety or care. Any contact must be proportionate, justified and respectful
- **Blur professional boundaries through inappropriate self-disclosure** – do not share personal information unless there is a clear professional purpose and it supports the resident's needs.

Any concerns regarding professional boundaries must be reported to management immediately.

7. Equality, Diversity & Inclusion

HSH is committed to providing an inclusive environment free from discrimination.

Staff must:

- Treat everyone fairly and with respect
- Promote equality of opportunity
- Challenge inappropriate behaviour where appropriate
- Support inclusive practices

Discrimination, harassment, victimisation, or exclusion based on protected characteristics will not be tolerated.

8. Safeguarding

Everyone has a responsibility to safeguard adults and children at risk. HSH's approach to safeguarding is laid out in its Safeguarding Policy, and staff much comply with the requirements of that policy at all times.

Staff must:

- Complete required safeguarding training
- Understand safeguarding responsibilities
- Recognise signs of abuse, neglect, exploitation or harm
- Report concerns immediately.
- Cooperate fully with safeguarding investigations

9. Health, Safety & Wellbeing

All staff are responsible for maintaining a safe working environment.

Staff must:

- Follow health and safety procedures
- Observe safe working practices
- Report hazards, accidents, incidents and near misses
- Use equipment safely and correctly
- Cooperate with risk assessments and safety measures

Staff must not:

- Deliberately disregard safety procedures
- Put themselves or others at unnecessary risk

10. Confidentiality & Data Protection

Staff must:

- Protect confidential and personal information
- Process information in accordance with data protection requirements
- Access information only when authorised and necessary
- Store information securely
- Report data breaches immediately

Staff must not:

- Share confidential information inappropriately
- Access records without a legitimate business reason
- Discuss sensitive information with unauthorised individuals

11. Use of Information Technology

Staff must:

- Use organisational systems responsibly
- Protect passwords and access credentials
- Follow all cyber security requirements
- Report suspected security breaches

Staff must not:

- Access inappropriate material using organisational systems
- Use systems in a way that risks data security

- Circumvent organisational security controls

12. Social Media & Online Conduct

Staff must:

- Behave professionally online
- Protect confidential information
- Maintain professional boundaries with residents
- Consider the potential impact of online activity on the organisation's reputation

Staff must not:

- Post content that could damage the organisation's reputation
- Share confidential information online
- Use social media to bully, harass or discriminate against others

13. Gifts, Hospitality & Conflicts of Interest

Staff must:

- Act impartially and objectively
- Declare actual, potential or perceived conflicts of interest
- Follow procedures for recording gifts and hospitality
- Refuse gifts or benefits that could influence decision-making

Staff must not:

- Accept gifts, payments or favours that could compromise professional judgement
- Use organisational opportunities for personal benefit

14. Raising Concerns & Whistleblowing

Staff have a duty to speak up if they become aware of:

- Unsafe practice
- Poor service standards
- Fraud or corruption
- Safeguarding concerns
- Ethical misconduct
- Breaches of policy, law or regulation

Concerns should be raised through:

- Line management arrangements
- Safeguarding procedures
- Grievance procedures
- Whistleblowing arrangements

HSH will ensure all concerns are taken seriously, investigated promptly and handled confidentially, with appropriate protection for those raising concerns in good faith.

15. Criminal Offences & External Investigations

Staff must promptly inform the organisation if they:

- Are arrested for an offence relevant to their role
- Become subject to safeguarding investigations
- Become subject to regulatory action
- Receive professional sanctions that may affect their suitability to work

Each matter will be considered fairly and proportionately.

16. Competence & Training

To meet the RSH Competence and Conduct Standard, all individuals representing HSH must maintain the knowledge, skills and behaviours required to carry out their role safely, ethically and professionally, and deliver good quality services.

Individuals must:

- Complete mandatory induction and role-specific training
- Participate in ongoing professional development
- Attend supervision and performance reviews
- Maintain the skills and knowledge required for their role
- Seek support when unsure or out of depth

HSH will provide appropriate training, supervision and development opportunities to ensure individuals remain competent, confident and compliant with the RSH Standard, including:

- Ongoing support for learning and development
- Regular appraisals
- Addressing of poor performance via the Saltbox Performance Management & Capability Policy

HSH will evidence staff competency through records of training, qualifications and actions plans to address competency gaps.

17. Qualifications & Professional Requirements

HSH is committed to ensuring that employees possess and maintain the appropriate qualifications, knowledge, skills and experience necessary to perform their roles effectively and delivery high quality services to customers.

Where a role requires a specific qualification, certification, registration or professional accreditation, this will be clearly identified with the job description, person specification or relevant professional standards.

HSH will support employees appointed to such roles to:

- Hold the required qualifications and professional memberships at the point of appointment, unless otherwise agreed by HSH
- Maintain any required qualifications, registrations or accreditations throughout their employment
- Provide evidence of qualifications, registrations or professional memberships when requested
- Promptly notify their line manager of any changes that affect their qualification status

Where a qualification is identified as essential for a role, career progression, succession planning or regulatory compliance, HSH may provide appropriate support which may include:

- Study leave
- Funding assistance
- Mentoring
- Access to learning resources

Management are responsible for ensuring that employees within teams hold and maintain any qualifications required for their role, appropriate records of such qualifications and other completed training will be maintained by HSH.

Where an employee is unable to obtain, maintain or renew a qualification that is essential to their role, HSH will review the circumstances and determine appropriate action. This may include providing additional support, implementing development plans, redeployment where suitable, or taking form action in accordance with the relevant HSH policies & procedures.

18. Breaches of this Policy

Failure to comply with the requirements of this policy may result in disciplinary action, and will be managed in line with the relevant policies & procedures. All concerns and alleged breaches will be investigated fairly, consistently and in accordance with the organisation's policies and procedures.

Depending on the seriousness of the breach, action may include:

- Informal management action
- Additional training or supervision
- Performance Improvement Plan (PIP)
- Formal warnings
- Suspension from duties where appropriate
- Termination of employment for serious or repeated misconduct
- Termination of placement for volunteers
- Referral to safeguarding authorities
- Referral to professional, regulatory or statutory bodies
- Referral to law enforcement agencies where appropriate

19. Responsibilities

Employees are responsible for:

- Reading and understanding this Code
- Complying with expected standards of behaviour
- Attending required training, positively engaging in skills development and taking ownership of professional development
- Reporting concerns promptly
- Maintaining the knowledge, skills and qualifications required for their role
- Demonstrating the values of the organisations, core principles of conduct and professional standards of behaviour at all times

Management are responsible for:

- Leading by example
- Promoting a positive culture or training, learning and development
- Addressing concerns appropriately
- Ensuring staff understand their responsibilities
- Taking action where breaches occur
- Providing appropriate induction, training, supervision and development opportunities to ensure employees are able to meet the competency requirements of their roles
- Supporting employees in maintaining professional standards

20. Review & Monitoring

HSH will monitor compliance with this policy through supervision, training, audits, investigations and performance management processes. Resident feedback will be taken on board through complaints, compliments and feedback through Tenant Satisfaction Measures.

This policy will be reviewed annually or sooner if:

- Legislation changes
- Regulatory requirements change
- Serious incidents occur
- Best practice evolves

HAWES STREET HOUSING

Appendix 1 – Staff Code of Conduct

🤝 Respect
We will be kind, polite & fair. We will listen to residents, value everyone's views, treat people equally and not accept discrimination or bullying.

⭐ Honesty & Integrity
We will be open & honest, make fair decisions, take responsibility for our actions and not misuse our position.

🏠 Residents First
We will provide good quality services, work in the best interest of residents, listen to concerns & complaints, and try to resolve problems quickly & fairly.

🛡️ Safety
We will help create safe homes & communities by taking safeguarding seriously, following health & safety rules, and acting if we see a risk to someone.

✅ Professional Standards
We will be reliable, responsible and behave professionally. We will work within our skills & knowledge and ask for help when needed. We will follow all relevant policies, procedures and regulations.

🔒 Protect Information
We will keep accurate records, follow data protection rules and keep personal information private. We will use information safely & securely.

🎯 Improve Resident Outcomes
We will work to a high standard, do our best to help residents and look for ways to improve services.

📚 Learn & Improve
We will take part in training and keep our skills up to date. We will listen to feedback and learn from mistakes & complaints.

📣 Speak Up
We will report risks to residents and concerns about poor practice. We will support a culture where people feel safe to raise concerns.

🌟 Trust & Confidence
We will act in line with HSH's values, treating people fairly and consistently. We will be accountable for our actions and work to earn residents' trust every day.

Residents can expect:
- ✅ We will be respectful & polite.
- ✅ We will listen to you.
- ✅ We will be honest and fair.
- ✅ We will help keep people safe.
- ✅ We will protect your information.
- ✅ We will learn and improve.
- ✅ We will provide the best service we can.
- ✅ We will communicate clearly & proactively.

Appendix 2 – Qualification Requirements

HSH aims to ensure that all staff hold to right qualifications for the roles they hold to ensure high quality, safe and effective services delivered to residents.

Definitions

A **Senior Housing Executive** means a member of the Senior Management Team who holds overall strategic responsibility for housing management services, has significant influence over how those services are delivered and is responsible for setting direction, culture, governance and performance standards across services

A **Senior Housing Manager** means a staff member with significant responsibility for housing management services on a day-to-day basis who leads teams, manages service performance and ensures services to residents are delivered effectively and in accordance with relevant policies & procedures.

The **Transition Period** is the period allowed by the Regulator of Social Housing for compliance with the qualification requirements of the Competence & Conduct Standard. In the case of Hawes Street Housing, this is a 4 year transition period starting from October 2026.

Qualifications

HSH will support relevant senior staff to obtain and maintain appropriate housing management qualifications where required, as set out by the Government's Policy Statement on Qualifications Requirements for Social Housing.

Senior Housing Managers should normally hold, or be working towards, a housing management qualification at Level 4 or equivalent.

Senior Housing Executives should normally hold, or be working towards, a housing management qualification at Level 5 or equivalent.

Timescales for Achieving Qualifications

HSH will ensure that qualifications for relevant staff are achieved within the relevant timescales for a Small Registered Provider.

Any employee in scope for such qualifications at the start of the transition period, or who comes into scope during the first 36 months of that period, must hole or be actively working towards a relevant qualification by the end of the transition period.

Employees who become in scope for such qualifications after the first 36 months of the transition period will be subject to the standard qualification requirements from the date they assume the role.

Where new appointments take place into roles that are in scope for these qualification requirements, staff should enrol on an appropriate qualification as soon as reasonably practical, normally enrolling within 12 months of becoming subject to the requirement. Staff will also be expected to maintain satisfaction progress throughout their studies.