



Shrewsbury Drapers Company Shrewsbury Drapers Holy Cross Ltd

Registered Charity 1132671
Company Number 07000798

Staff Competence and Conduct Policy

Date adopted by Board: 9th September 2026

Date of next review: August 2027

Version No: 1



SHREWSBURY DRAPERS HOLY CROSS LIMITED

Registered Charity 1132671 | Company No. 07000798

Staff Competence and Conduct Policy

1. Purpose

This policy sets out how Shrewsbury Drapers Holy Cross Limited (SDHC) manages and develops the skills, knowledge, experience and conduct of staff involved in the provision of services connected with the management of its social housing, and how it satisfies itself that the staff of its contractors do the same.

SDHC is a small registered provider of social housing operating 58 almshouse dwellings. It has two members of staff. The policy is written to be proportionate to that scale while meeting the requirements of the Competence and Conduct Standard in full.

The purpose behind the requirement matters as much as the requirement itself. Residents of SDHC's almshouses are entitled to be dealt with by people who know what they are doing and who treat them with respect. This policy exists to make that a matter of record rather than of goodwill.

2. Regulatory basis

The Social Housing (Regulation) Act 2023 empowered the Secretary of State to direct the Regulator of Social Housing to set a standard on the competence and conduct of staff. The Direction requires the Regulator to set a standard obliging registered providers to:

- secure that relevant staff have the necessary skills, knowledge and experience, and exhibit the behaviours needed, for the services they provide to be of good quality;
- take appropriate steps to secure the same in respect of the relevant staff of their services providers;
- hold a written policy setting out its approach to managing and developing those matters, and update that policy regularly;
- adopt or develop an appropriate code of conduct for relevant staff and ensure it is embedded in the organisation; and
- comply with the qualification requirements set out in the Government's policy statement.

The written policy must in particular be tailored as appropriate to the different roles of relevant staff, and must set out the provider's approach to learning and development, to appraisal and regular performance review, and to managing poor performance.

The Regulator has confirmed that these requirements sit in a standalone Competence and Conduct Standard rather than within the Transparency, Influence and Accountability Standard, and that the new standard takes effect from 1 October 2026 alongside the revised TI&A Standard and the updated Consumer Standards Code of Practice.

Two points of scope are worth recording. First, there is no exemption from the written policy or code of conduct requirements for small providers. The four year transition period available to providers with fewer than 1,000 homes applies only to the qualification element. The policy and code obligations apply in full from 1

October 2026. Second, whether someone is within scope depends on the function they actually perform, not on their job title.

3. Definitions

Two different tests operate in this area and conflating them is the most common error. The skills, behaviours and code of conduct obligations attach to all relevant staff. The qualification obligation attaches only to the narrower category of Relevant Persons. SDHC applies each test separately.

Relevant staff	Staff involved in the provision of landlord services, that is, services in connection with the management of social housing provided by SDHC. There is no proportion of time threshold in this definition. Landlord services include allocations, appointment and licence management, repairs and maintenance, income management, complaints, estate management, asset and building safety management, and resident engagement.
Relevant Person	A narrower category, used only to determine who is caught by the qualification requirement. A member of relevant staff is a Relevant Person only where they are a senior housing manager or senior housing executive, have a substantive role in managing delivery of housing management services (meaning the majority of their working time, or an important and substantial aspect of the role), have held the post for more than 12 months, and no exemption applies.
Senior housing manager	A member of relevant staff with responsibility for, and autonomy in, decisions about the operational management and oversight of housing management services, or who manages their quality or safety, or who decides on changes to policy or service delivery. Subject to the Level 4 qualification threshold. Someone delivering frontline services with little or no decision making power is not a senior housing manager.
Senior housing executive	A member of relevant staff with responsibility, solely or jointly, for the day to day management of the provision of housing management services, who is part of SDHC's senior management. Subject to the Level 5 qualification threshold.
Services provider	A person or organisation which, under an agreement, provides services in connection with the management of SDHC's social housing, or arranges for their provision. This is broader than a managing agent: SDHC's repairs, maintenance, grounds and compliance contractors are services providers. A contract of employment is not such an agreement. See section 11.
Exempt functions	Functions which, without a wider substantive role, take a person outside the qualification requirement: back office managerial functions not involving direct delivery to residents (legal, IT, data, procurement, HR, and finance functions such as processing payments and accounting); construction of new buildings and management of unoccupied buildings; delivery of care and support; and management of a housing register or statutory homelessness decisions. Finance functions related to income management in a social housing context are not exempt.

4. Who this policy applies to

SDHC will determine, and record in writing, which of its staff are relevant staff, and separately which are Relevant Persons for qualification purposes. Both determinations are reviewed annually and whenever a role changes materially or a new post is created. The current determination is:

Post	Relevant staff?	Relevant Person?	Basis
Property and Compliance Manager	Yes	Yes	Landlord services form the substantial majority of the role, which carries decision making responsibility for

Post	Relevant staff?	Relevant Person?	Basis
			policy, service delivery, quality and safety. As a result, classified as senior housing executive.
Finance and Administration Officer	Yes	No	The role is substantially resident facing as well as financial. It includes property visits, arranging repairs, receiving resident contact including complaints, and general administration. It is therefore plainly relevant staff, and the whole of this policy applies to it. It is not a Relevant Person because the qualification requirement reaches only senior housing managers and senior housing executives, and the role delivers and administers services rather than managing their quality or deciding service policy. The Board should minute this determination rather than assume it.
Trustees / Drapers	No	No	Acting in a governance capacity, not as staff delivering landlord services. Unpaid volunteers are in any event outside the qualification requirement. Trustees remain subject to the Board's own code of conduct.
Contractors' staff	See s.11	No	Contractors are services providers, so the steps at section 11 apply to their relevant staff. None delivers a comprehensive social housing management service, so their managers are outside the qualification requirement.

Where the determination is finely balanced, SDHC will treat the role as in scope. The cost of applying this policy to someone who did not strictly need it is negligible; the cost of wrongly excluding someone is a compliance failure and, more importantly, a person delivering services to residents without a competence framework around them.

5. Competence framework

Competence is treated as four things: skills, knowledge, experience and behaviours. The standard requires the approach to be tailored to the different roles of relevant staff. The framework below therefore sets out a short set of shared expectations that apply to everyone, followed by the specific expectations for each of SDHC's two posts.

5.1 Shared expectations, applying to all relevant staff

Element	Expectation
Knowledge	SDHC's own policies and the procedures that apply to the postholder's work; the licensee status of residents and what it means in practice; how to recognise and raise a safeguarding concern; data protection obligations when handling resident information; equality, diversity and inclusion, including recognising where residents may be disproportionately affected by the way services are delivered; and how to recognise and report a repair, hazard or safety concern.
Skills	Communication with residents that is clear, accessible and adapted to the needs of the individual; accurate and contemporaneous record keeping; handling a complaint or concern properly at the point it is raised; and recognising when a matter must be escalated rather than dealt with alone.

Element	Expectation
Experience	Sufficient familiarity with SDHC's sites, residents and systems to notice when something is not as it should be.
Behaviours	As set out in the Code of Conduct at Appendix A.

5.2 Property and Compliance Manager Expectations

Element	Additional expectation
Knowledge	Current working knowledge of the RSH consumer standards; the Housing Ombudsman Complaint Handling Code; almshouse law and the legal basis on which residents occupy; landlord health and safety duties covering fire, gas, electrical, water hygiene and asbestos; damp, mould and property condition standards; data protection law; and the charity law framework applying to SDHC.
Skills	Policy drafting; investigation and complaint handling; specification, procurement and contract management; risk assessment; design and maintenance of records and data systems; and reporting to the Almshouse Committee and Board.
Experience	Practical experience of housing management in a regulated environment, sufficient to exercise independent judgement and to recognise when a matter requires external professional advice.

5.3 Finance and Administration Officer Expectations (*Housing Related Only*)

Element	Additional expectation
Knowledge	SDHC's repairs process and reporting routes; the weekly maintenance contribution and service charge arrangements; the complaints policy and how a complaint is recorded and passed on; the safeguarding referral route; and financial controls and record keeping requirements applying to a registered charity.
Skills	Conducting and recording property visits; raising, ordering and tracking repairs through to completion; telephone and face to face contact with residents; accurate financial and administrative record keeping; and identifying when a resident contact is in substance a complaint, a safeguarding matter or a repair that needs prioritising.
Experience	Sufficient working knowledge of the sites, the residents and SDHC's contractors to judge what a reported problem is likely to involve and how urgently it needs attention.

Where a role changes materially, the relevant framework is reviewed at the same time as the determination at section 4.

6. Qualification requirements

Relevant Persons classified as senior housing managers must hold, or be working towards, a regulated Level 4 or higher qualification meeting the criteria in the Government's policy statement. Senior housing executives must hold, or be working towards, a regulated Level 5 or higher qualification. Where a role is primarily technical or property focused, a relevant technical qualification broadly relevant to the role may be used to meet the requirement instead of the housing management route.

Any new Relevant Person appointed to a post subject to the qualification requirement, including on a temporary or interim basis, will be enrolled on a compliant qualification within 12 months of starting. The requirement will be stated expressly in the role description and in the contract of employment.

Current position (August 2026). *The Property and Compliance Manager holds the CIH Level 5 Diploma in Housing, a regulated qualification that meets the requirements of the Competence and Conduct Standard, and is a Chartered Member of the Chartered Institute of Housing. SDHC therefore meets the qualification requirement in full at the date of this policy, irrespective of whether the post is classified as senior housing manager or senior housing executive. This is recorded here so that the position is evidenced rather than assumed.*

SDHC notes that as a provider with fewer than 1,000 homes it would have until October 2030 to satisfy the qualification requirement. It does not rely on that transition period.

7. Learning and development

7.1 Principle

Holding a qualification is a starting point, not a conclusion. Regulation, law and good practice in social housing change frequently, and a qualification obtained some years ago does not by itself demonstrate current competence. SDHC's approach is therefore built around maintaining and evidencing currency.

7.2 Continuing professional development

Each relevant staff member will maintain a CPD record covering the year, recording activity undertaken, what changed as a result, and any gaps identified. Where the staff member is a member of a professional body with its own CPD requirement, that record may be used, provided it covers the matters above.

7.3 How development needs are identified

- Annually at appraisal, against the competence framework at section 5.
- On any material change in law, regulation or the Regulator's expectations.
- Following a complaint, near miss, service failure or adverse audit finding, where the review identifies a knowledge or skills cause.
- On taking on a new area of responsibility, for example a development project or a new statutory duty.
- On the postholder's own initiative, which is expected rather than merely permitted.

7.4 How development is supported

The Employment Policy (Policy No. 13) does not address learning and development. This policy is therefore SDHC's statement of its approach, and Policy No. 13 will cross refer to it on its next revision.

SDHC will meet the reasonable cost of qualifications, professional body membership, training and CPD required for a member of relevant staff to remain competent, and will allow reasonable working time for it. A training budget will be set annually as part of the budget process.

Given the size of the organisation, SDHC recognises that it cannot supply internal peer challenge or specialist internal expertise. It will therefore actively support external routes to development. These include professional body networks such as the CIH, peer groups with other small registered providers and almshouse charities, Almshouse Association resources, and sector events. SDHC treats these as part of the competence framework rather than as discretionary extras.

7.5 Specialist and technical competence

Some duties require technical competence that SDHC does not hold internally and does not intend to. In those cases SDHC procures the competence. Areas where SDHC relies on external specialists include (but are not exclusive to):

- RICS qualified stock condition / building surveys, and valuation work;
- fire risk assessment, and asbestos and water hygiene risk assessment;

- electrical and gas inspection, testing and certification;
- construction design and management duties on major works and redevelopment;
- the independent examination or audit of the charity's accounts, and payroll;
- legal advice on occupation, charity and property matters; and
- employment and HR advice.

Where competence is procured, the competence expected of SDHC staff is different but not lesser: the ability to specify the work properly, to interrogate the advice received, to recognise when advice is inadequate or out of date, and to act on findings within the required timescales. Development activity is directed accordingly.

8. Appraisal and performance review

Appraisal at SDHC uses the appraisal form at Appendix A of the Employment Policy (Policy No. 13). That policy provides the form but does not set out how often appraisal takes place, who conducts it, or what it must cover. This policy supplies those points for relevant staff. It does not create a separate process and does not affect the employment relationship, which Policy No. 13 governs.

Every relevant staff member will have a documented annual appraisal and at least one recorded interim review during the year. Alongside the matters on the Appendix A form, the appraisal will address performance against the competence framework at section 5, conduct against the Code at Appendix A of this policy, CPD undertaken during the year, and development needs for the year ahead. The outcome will be recorded in writing and held on the personnel file.

Governance point. The Property and Compliance Manager has no line manager. The Board must therefore designate who conducts that appraisal, in practice the Chair of the Almshouse Committee, the Chair of the Board, or a nominated trustee, and record the designation. Without it, the requirement for appraisal and regular performance review cannot be met for the post most clearly within scope. The same designation should cover the poor performance route at section 9.

SDHC recognises that appraisal conducted by a non executive trustee has limitations: trustees are not employment professionals and are not immersed in the day to day work. The appraisal will therefore draw on documented evidence, including complaint outcomes, compliance performance, audit findings, resident feedback and the CPD record, rather than on impression alone.

9. Managing poor performance

Formal action on performance or conduct is taken under the disciplinary and grievance procedures set out within the Employment Policy. This policy does not create a parallel procedure and nothing in it displaces those procedures or the rights of the employee under them.

10. Code of conduct

SDHC adopts the Code of Conduct for Relevant Staff at Appendix A. It applies to all relevant staff and, so far as reasonably practicable, is reflected in the expectations placed on contractors under section 11.

The Code is embedded through inclusion in the induction of any new member of relevant staff, explicit assessment against it at annual appraisal, publication to residents, and review by the Board at least every two years. Breach of the Code may be dealt with under the disciplinary procedure set out in the Employment Policy.

11. Contractors and services providers

SDHC does not delegate housing management to a managing agent. It does contract for repairs, maintenance, grounds, cleaning and compliance services, and contractors' staff attend residents' homes routinely. These contractors are services providers.

Two distinct obligations apply, and SDHC keeps them separate. The skills, knowledge, experience and behaviours obligation applies in relation to the relevant staff of all services providers. The qualification obligation applies only where a services provider delivers a comprehensive social housing management service, meaning all or the majority of the eleven housing management functions listed at paragraph 59 of the Government's Policy Statement on Qualifications Requirements for Social Housing. Those functions are:

1. customer services management;
2. complaints management;
3. tenant involvement or empowerment;
4. allocations and lettings management;
5. management of tenancies or licences;
6. income management;
7. repairs and maintenance;
8. asset management, including building and fire safety management;
9. anti social behaviour management;
10. estate management; and
11. capital or major works within occupied buildings.

No SDHC contractor delivers all or the majority of these, and SDHC therefore does not require qualifications of contractors' managers. SDHC will reassess this if it ever appoints a managing agent.

The appropriate steps SDHC takes in respect of contractors' relevant staff are:

- conduct and competence expectations written into the contract or specification at the point of tender;
- evidence of relevant trade competence, accreditation and insurance obtained before appointment and rechecked at renewal;
- confirmation of appropriate vetting for staff working in residents' homes;
- an expectation that contractors' staff conduct themselves consistently with the Code at Appendix A while on SDHC premises; and
- monitoring through resident feedback, complaints and contract review, with conduct failures raised formally with the contractor.

Where a contractor is found to fall short and does not remedy the position, SDHC will treat that as a contract performance matter up to and including termination.

12. Resident involvement and accessibility

The standard requires that residents are given a meaningful opportunity to influence and scrutinise this policy and the Code of Conduct, and that both are accessible to them. Meaningful is the operative word: circulating a finished document for comment is not consultation.

Before adoption, SDHC will:

- provide residents with a short, plain English summary of what the policy and Code cover and what they are being asked about, in hard copy as well as electronically;
- invite comment at two sessions, held at the Drapers Place and Fairford Place coffee mornings, and allow a reasonable period for written responses afterwards;
- specifically invite residents' views on what good conduct by staff and contractors looks like from their side of the door, and reflect those views in the Code;
- report to the Almshouse Committee or SDHC Board on what residents said and what changed as a result, including where a suggestion was not adopted and why; and
- repeat a proportionate version of this exercise at each substantive review.

Once adopted, the policy and Code will be published on SDHC's website and made available in hard copy on request at no charge. A large print version will be available as standard.

13. Records and evidence

SDHC will maintain, and be able to produce to the Regulator on request:

- the written determinations of relevant staff and Relevant Person status, and the basis for each;
- evidence of qualifications held, or of enrolment and progress where a qualification is being worked towards;
- CPD records for each relevant staff member;
- appraisal and interim review records;
- evidence of resident involvement in this policy and the Code;
- records of steps taken in respect of contractors under section 11; and
- the record of Board approval and each subsequent review.

These records are held in accordance with SDHC's Data Protection Policy and retention schedule. Personnel records are held securely and separately from resident records.

14. Monitoring and review

The Property and Compliance Manager reports annually to the Almshouse Committee on compliance with this policy, covering the relevant staff and Relevant Person determinations, the qualification and CPD position, appraisal completion, contractor assurance, and any conduct matters arising. Because the postholder is also a principal subject of the policy, that report will be received by the Committee as an assurance item and tested by the designated trustee, not simply noted.

The policy is reviewed annually and whenever there is a material change in regulation, in the organisation's structure, or in the services it delivers. The Code of Conduct is reviewed at least every two years with resident input.

Related documents: Code of Conduct for Relevant Staff (Appendix A); Employment Policy (Policy No. 13), including the appraisal form at its Appendix A; Complaints Policy; Data Protection Policy; Safeguarding Policy; Repairs and Maintenance Policy; Allocations Policy; Resident Handbook.

Appendix A: Code of Conduct for Relevant Staff

This Code applies to all SDHC staff who are relevant staff under the Competence and Conduct Standard. Contractors' staff working in and around residents' homes are expected to conduct themselves consistently with it. It is deliberately short: a code nobody can remember is not embedded.

Towards residents

- Treat every resident with courtesy and respect, and in a way that recognises the almshouse as their home and not merely SDHC property.
- Give notice before entering a resident's home other than in an emergency, explain the purpose, and leave when asked to.
- Be honest about what SDHC can and cannot do, and about how long something will take. Do not make commitments that cannot be kept.
- Take complaints and concerns seriously, record them, and do not treat a complaint as a nuisance or hold it against the person raising it.
- Adjust the manner and pace of contact to the needs of the individual resident, and ask rather than assume what those needs are.
- Never take advantage of a resident's dependence, trust or circumstances. Do not accept gifts, loans or bequests from residents, and report any offer.
- Respect residents' privacy and handle their personal information only as SDHC's Data Protection Policy permits.
- Raise safeguarding concerns immediately, and never assume someone else has done so.

In the work

- Work within your competence. Where a matter is beyond it, say so and obtain proper advice rather than improvising.
- Keep knowledge current, and maintain the CPD record required by this policy.
- Keep accurate, contemporaneous records. Do not create a record after the fact and present it as contemporaneous.
- Report errors, near misses and compliance failures promptly, including your own.
- Apply SDHC's policies consistently, and where a policy produces an unjust result, escalate it rather than quietly departing from it.

Integrity and conduct

- Declare any conflict of interest, personal or financial, and take no part in a decision affected by one.
- Do not use your position, or SDHC's resources, information or contracts, for personal benefit or the benefit of family or friends.
- Deal with contractors and applicants impartially. Award work on merit.
- Do not discriminate, harass or victimise, and challenge it in others.
- Protect the reputation of SDHC and of the charitable purpose it exists to serve, including in public and online.
- Cooperate honestly with the Board, the Regulator, the Housing Ombudsman and auditors.

If you are unsure whether something is consistent with this Code, raise it before acting rather than afterwards. Nobody at SDHC will be criticised for asking.

Appendix B: Relevant staff determination record

Completed, signed and retained. Reviewed annually and on any material change of role. The determinations below reflect the position at the effective date of this policy and carry across the reasoning at section 4.

Post	Relevant staff	Relevant Person	Reasoning
Property and Compliance Manager	Yes	Yes	Landlord services form the substantial majority of the role, which carries decision making responsibility for service quality, safety and policy. Classified as either senior housing manager or senior housing executive. Holds the CIH Level 5 Diploma in Housing, so the qualification requirement is met.
Finance and Administration Officer	Yes	No	Substantially resident facing alongside the finance element: property visits, arranging repairs, receiving resident contact including complaints, and general administration. The role delivers and administers services rather than managing their quality or setting service policy, and so is not a senior housing manager or senior housing executive.

Determination made by	David Wood
Date	05/08/2026
Board Approval	09/09/2026
Next review due	08/2027