

COMPETENCY AND CONDUCT POLICY

Competency and Conduct Policy

Responsible Officer	Section One: Head of Learning & Organisation Development Section Two: Group Procurement Manager
This policy is applicable to	Karbon Group
Policy version	2
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Policy Statement

Within the Karbon Homes Group (the Group), we are committed to providing safe, respectful and high-quality services for our customers while delivering the goals set out in our Stronger Foundations Strategy.

All colleagues and suppliers must demonstrate the skills, knowledge, experience and behaviours needed to carry out their role safely, professionally and to the standard our customers should expect.

This policy explains how we recruit, develop, support and monitor colleagues to make sure they have the skills, knowledge, experience and behaviours needed to provide effective services and positive customer experiences.

The policy also explains how we will work with suppliers and hold them to account, so that people delivering services on our behalf meet appropriate standards of competence, conduct and customer service.

This policy supports the requirements of the Competence and Conduct Standard and reflects our commitment to professionalism, accountability and continuous improvement.

This policy does not form part of any employee's contract of employment. It may be reviewed and updated to reflect changes in legislation, regulation, guidance or best practice.

We will consult with colleagues, Trade Unions and customers when making significant changes to this policy to help ensure it remains relevant, effective and focused on customer needs.

Risk the policy is designed to control

6 – Governance and Compliance

10 - People

Key performance measures

The Group monitors customer feedback, complaints, compliance and safety performance, colleague development activity and other service performance measures to understand whether this policy is supporting safe, respectful and effective services in line with the Competence and Conduct Standard. This information will be used to help provide internal

and external assurance that the commitments set out in this policy are being delivered in practice and will inform some of the information published in our annual customer report.

Definitions

Relevant Employees - Employees and engaged workers whose roles deliver or materially influence the quality, safety, compliance, or tenant experience of landlord services.

Competence - The combination of skills, knowledge, experience, and behaviours necessary to perform role requirements safely, ethically, and to a high standard.

Supplier and Contractors - Relates to any third party providing us with goods or services, may also be referred to as; economic operator, service provider, contractor, and sub-contractor.

Customers - Relates to anybody living in a Group home (including leaseholders and other owner occupiers to whom the Group delivers services) may also be referred to as external customer.

Colleagues - Relates to any employee of the Group, may also be referred to as internal customer, stakeholder.

Contract Manager - Relates to any manager of the Group, who may have budgetary responsibility for a business area, may also be referred to as colleague.

Abbreviations

L&OD: Learning and Organisation Development

KLT: Karbon Leadership Team

SME: Small or Medium Enterprise

PA2023: Procurement Act 2023

SVA: Public Services Social Value Act 2012

MSA: Modern Slavery Act 2015

ECCTA: Economic Crime and Corporate Transparency Act 2023

Policy Detail

1. Purpose of policy

- 1.1. This policy sets out the Group's approach to ensuring that we will meet all applicable requirements of the Social Housing (regulation) Act, and the Competence and Conduct Standard.
- 1.2. All colleagues and suppliers who deliver or influence the delivery of landlord services are suitably skilled, knowledgeable, experienced and exhibit the right behaviours.
- 1.3. The Competence and Conduct Standard for social housing colleagues' section of this policy outlines how we will make sure colleagues have, and continue to develop, the skills, knowledge, experience and behaviours they need to deliver safe, respectful, effective and customer-focused housing services. This includes how we recruit people, welcome them into the organisation, support learning and development, review performance and address performance concerns where needed.

- 1.4. The Competence and Conduct Standard for social housing services suppliers section explains, how we will work with suppliers and hold them to account, so that people delivering housing services on our behalf also demonstrate the skills, knowledge, experience and behaviours needed to provide safe, effective and customer-focused services.

2. Objectives

- 2.1. The objectives of this policy are to:
- 2.2. Set out how we will make sure colleagues and suppliers have the skills, knowledge, experience and behaviours they need to perform their roles safely, effectively and professionally.
- 2.3. Support compliance with legal, regulatory and professional requirements, including the Competence and Conduct Standard for social housing.
- 2.4. Make clear how this policy links to procurement, recruitment, onboarding, probation, learning and development, performance management, capability and disciplinary processes.
- 2.5. Provide assurance to customers and stakeholders that colleagues and suppliers are maintaining the skills, knowledge, experience and behaviours required to deliver high-quality services and positive outcomes for customers, including through appropriate monitoring, review and reporting.

Section one - The Competence and Conduct Standard for Colleagues

1. Code of conduct

- 1.1. Karbon's Code of Conduct sets out the behaviours expected of all colleagues. Our Code is aligned to the National Housing Federation Code of Conduct, which is supported by housing professionals and sector representatives to ensure consistent standards of conduct, professionalism and accountability across the sector.
- 1.2. The Code of Conduct is available to all colleagues throughout their employment. Colleagues are expected to understand and apply the standards set out within it, and compliance with the Code forms part of how conduct and competence are assessed and managed.

2. Qualifications

- 2.1. In line with the Government's Policy Statement on Qualifications Requirements for Social Housing, the Group will ensure that:
- 2.2. Senior Housing Managers (those with a substantive role in managing the direct delivery of housing management services) hold, or are working towards, an Ofqual-regulated Level 4 housing management qualification covering the nationally specified content.

- 2.3. Senior Housing Executives (Heads of Service/Directors with strategic responsibility for housing management services) hold, or are working towards, an Ofqual-regulated Level 5 housing management qualification covering the nationally required content.
- 2.4. These qualification requirements apply to both Group Employees and, where service providers deliver comprehensive housing management services on the Group's behalf, to their relevant senior managers.
- 2.5. The Group will identify all roles that fall within the scope of the Government's Policy statement on Qualifications Requirements for Social Housing and maintain a list of qualification required roles.
- 2.6. Job descriptions for all qualification required roles will clearly state the mandatory qualifications.
- 2.7. Candidates will be expected to already hold the required qualification at appointment. Where a suitably qualified candidate is not available, the Group may appoint a candidate who does not yet hold the qualification, provided they can achieve it within the statutory timeframe.
- 2.8. Employees appointed without the qualification must enrol and begin working towards it within the nationally required timescales.

3. Recruitment and Selection

- 3.1. We recruit people who have, or can develop, the skills, knowledge, experience and behaviours needed to provide safe, respectful, effective and customer-focused services.
- 3.2. Recruitment and selection will be carried out in line with our Recruitment and Selection Policy and Procedure.

4. Induction

- 4.1. When colleagues join us, they will complete an induction to help them understand their role, the standards expected of them, and how their work supports safe, respectful, effective and customer-focused services.
- 4.2. Induction will be carried out in line with our Onboarding, Probation and Transition Policy and Procedure.

5. Maintaining and Developing Competence

- 5.1. We are committed to helping colleagues maintain and develop the skills, knowledge, experience and behaviours needed for their role.
- 5.2. Learning and development activities will be provided to support:
 - Statutory and mandatory requirements.
 - Regulatory and professional requirements.
 - Emerging business and customer needs.
 - Individual learning and development needs

- 5.3. Managers are responsible for ensuring colleagues understand the expectations of their role and maintain the skills, knowledge, experience and behaviours required to perform it effectively.
- 5.4. Development needs may be identified through one-to-one conversations, customer feedback, compliance monitoring, performance information, organisational priorities, changes in legislation or regulation, and annual review discussions.
- 5.5. Where a colleague requires additional support to develop and demonstrate the skills, knowledge, experience or behaviours required for their role, an appropriate development plan may be agreed between the colleague and their manager.
- 5.6. Where colleagues carry out work that requires specific qualifications, licences, registrations or professional accreditations, the Group will ensure these requirements are maintained and monitored.
- 5.7. Colleagues are responsible for taking the appropriate steps to maintain these requirements throughout their employment and must notify their manager if they are unable to do so.
- 5.8. All learning and development activity will be delivered in line with the Group's L&OD approach and associated procedures.

6. Reviewing Competence and Development

- 6.1. Managers and colleagues are expected to have regular conversations about performance, conduct, wellbeing and development needs.
- 6.2. We will formally review colleagues' skills, knowledge, experience and behaviours through our annual Be Your Best process.
- 6.3. The Be Your Best conversation is a mandatory recorded discussion between a manager and colleague which includes reviewing performance, development needs and future objectives.
- 6.4. Outcomes from these conversations will be used to support learning, development and continuous improvement and will be managed in line with the Be Your Best procedure

7. Demonstrating competence

- 7.1. We monitor a range of information to gain assurance that colleagues are demonstrating the skills, knowledge, experience and behaviours required for their role. This may include:
 - Customer feedback and satisfaction measures.
 - Complaints and compliments.
 - Compliance and safety performance.
 - Completion of mandatory training.
 - Professional qualifications and registrations.
 - Performance reviews and development discussions.
 - Service performance information.

- 7.2. Information from these sources will be reviewed at appropriate levels across the organisation to identify strengths, risks, trends and areas for improvement.
- 7.3. This information will be used to support learning and development, improve services and provide assurance that colleagues continue to maintain the skills, knowledge, experience and behaviours required for their roles.
- 7.4. Where assurance activities identify concerns relating to competence or conduct, appropriate action will be taken in line with relevant policies and procedures.
- 7.5. Customer feedback, concerns and complaints are important sources of information about the competence and conduct of colleagues and suppliers. Where appropriate, this information will be used to support learning, improve services and identify any action that may be required.
- 7.6. If customers believe a colleague has not demonstrated the required standards of competence or conduct, they can raise their concerns through the Group's Complaints Policy.

8. Managing Under Performance

- 8.1. Where concerns arise about a colleague's skills, knowledge, experience, behaviours or performance, managers will normally address these through regular conversations, feedback and appropriate support.
- 8.2. Where additional support is needed, managers and colleagues will work together to identify development actions and reasonable timescales for improvement.
- 8.3. If concerns relate to a colleague's competency to carry out their role and cannot be resolved through informal support, appropriate action will be taken in line with the Capability Policy and Procedure.
- 8.4. If concerns relate to a colleague's conduct or behaviour and cannot be resolved through informal support, appropriate action will be taken in line with the Disciplinary Policy and Procedure.
- 8.5. Where a colleague fails to obtain or maintain the qualifications, licences, registrations or mandatory training required for their role, appropriate action will be taken in line with the Capability Policy and Procedure.

Section two - The Competence and Conduct Standard for Housing Services Suppliers

1. Purpose of policy

- 1.1. The aim of this policy is to go beyond compliance and to turn transactional relationships with our service suppliers into partnerships.

2. Policy detail

2.1. Where applicable the Group will ensure service providers' Employees have the necessary skills, knowledge, experience, and behaviours through:

2.1.1. Procurement requirements:

- Use of a standard qualification questionnaire on supplier registration, prior to award of a contract.
- Specification clauses requiring role-specific competence, CPD, and conduct aligned to our Code of Conduct
- Information security and data protection compliance.

2.2. Contract terms:

- Reporting on training completion, qualifications, and incident/near-miss learning.
- Sanctions for non-compliance up to termination.

2.2.1. Monitoring:

- Adherence to the Groups Contractor Code of Conduct (developed with tenants).

2.3. Karbon's Contractor Code of Conduct outlines the principles, standards, and expectations for its suppliers. It includes guidelines on ethical behaviour, environmental policies, and compliance with laws and regulations. This document helps to ensure that suppliers, subcontractors, and subsidiaries align with Karbon's values regarding employment standards, health and safety, and business ethics.

2.4. The Contractor Code of Conduct is available to all via the Procurement page on Karbon's external web site.

Sections one & two – The Monitoring and Review

1. Managers

- Ensure staff are competent, trained, and supported to meet role requirements.
- Monitor performance of relevant contracts and suppliers.
- Hold regular one-to-ones and annual reviews in line with policy and guidance and using standard templates.
- Manage induction, probation, and poor performance or colleagues in line with policies and procedures.
- Promote safe, professional and customer focused practice.

2. Colleagues

- Maintain the skills, knowledge, behaviours, and qualifications required for their role.
- Complete mandatory training and keep accurate records.
- Follow the standards in this policy and the Code of Conduct.
- Engage in supervision, reviews and Continuous Professional Development (CPD).

3. People and Organisational Development

- Maintain the policy and support managers with performance, conduct and development processes.
- Coordinate mandatory training and maintain qualification records.

- Ensure alignment with regulatory and employment requirements.

- 3.1. The Head of L&OD is responsible for monitoring the effectiveness of the Competence and Conduct Standard for social housing colleagues' section of this policy and ensuring it remains aligned with legal, regulatory and business requirements.
- 3.2. Managers, subject matter experts and senior leaders will use relevant performance, compliance and customer feedback information to monitor the effectiveness of this policy and identify any action required to maintain competence and conduct standards.
- 3.3. The Group Procurement Manager is responsible for monitoring the effectiveness of the Competence and Conduct Standard for social housing service suppliers' section of this policy and the uptake of the Contractor Code of Conduct agreement ensuring it remains aligned with legal, regulatory and business requirements.
- 3.4. We will provide assurances to customers that we are adhering to this policy by publishing relevant information in our annual customer report.
- 3.5. Customers will have opportunities to review and scrutinise how we apply this policy and the outcomes it supports. Feedback from customers will be considered as part of future reviews.
- 3.6. This policy will be reviewed at least every three years.
- 3.7. The policy may be reviewed sooner where there are significant changes to legislation, regulation, sector guidance or organisational requirements.

4.0 Equality and Diversity

- 4.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 4.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 4.3 If you would like this or any other policies in a different language or format please contact inclusion@karbonhomes.co.uk.

5.0 Data Protection and Privacy

- 5.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.

