



WOKINGHAM BOROUGH COUNCIL

A Meeting to consider an **INDIVIDUAL EXECUTIVE MEMBER DECISION** will be held in LGF3 - Civic Offices, Shute End, Wokingham RG40 1BN on **TUESDAY 19 MARCH 2024 AT 11.30 AM**

Susan Parsonage
Chief Executive
Published on 8 March 2024

Members of the public are welcome to attend the meeting or participate in the meeting virtually, in accordance with the Council's Constitution. If you wish to participate either in person or virtually via Microsoft Teams, please contact Democratic Services: Democratic.services@wokingham.gov.uk

The meeting can also be watched live using the following link:
<https://www.youtube.com/live/JeH5G6BZqYI?feature=shared>

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WOKINGHAM BOROUGH COUNCIL

Our Vision

A great place to live, learn, work and grow and a great place to do business

Enriching Lives

- Champion outstanding education and enable our children and young people to achieve their full potential, regardless of their background.
- Support our residents to lead happy, healthy lives and provide access to good leisure facilities to complement an active lifestyle.
- Engage and involve our communities through arts and culture and create a sense of identity which people feel part of.
- Support growth in our local economy and help to build business.

Safe, Strong, Communities

- Protect and safeguard our children, young and vulnerable people.
- Offer quality care and support, at the right time, to prevent the need for long term care.
- Nurture communities and help them to thrive.
- Ensure our borough and communities remain safe for all.

A Clean and Green Borough

- Do all we can to become carbon neutral and sustainable for the future.
- Protect our borough, keep it clean and enhance our green areas.
- Reduce our waste, improve biodiversity and increase recycling.
- Connect our parks and open spaces with green cycleways.

Right Homes, Right Places

- Offer quality, affordable, sustainable homes fit for the future.
- Build our fair share of housing with the right infrastructure to support and enable our borough to grow.
- Protect our unique places and preserve our natural environment.
- Help with your housing needs and support people to live independently in their own homes.

Keeping the Borough Moving

- Maintain and improve our roads, footpaths and cycleways.
- Tackle traffic congestion, minimise delays and disruptions.
- Enable safe and sustainable travel around the borough with good transport infrastructure.
- Promote healthy alternative travel options and support our partners to offer affordable, accessible public transport with good network links.

Changing the Way We Work for You

- Be relentlessly customer focussed.
- Work with our partners to provide efficient, effective, joined up services which are focussed around you.
- Communicate better with you, owning issues, updating on progress and responding appropriately as well as promoting what is happening in our Borough.
- Drive innovative digital ways of working that will connect our communities, businesses and customers to our services in a way that suits their needs.

For consideration by

Stephen Conway, Leader of the Council and Executive Member for Housing

Officers Present

Liam Oliff, Democratic and Electoral Services Specialist

Ruby Shekhawat, Policy Officer- Economy and Housing

IMD NO.	WARD	SUBJECT	
IMD 2024/06	All Wards	IEMD – COMPETENCE AND CONDUCT FOR SOCIAL HOUSING MANAGERS	5 - 34

Exclusion of the Public

The Executive Member may exclude the public in order to discuss the Part 2 appendix related to the agenda item above and to do so it must pass a resolution in the following terms:-

That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for this item of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 1 of Part 1 of Schedule 12A of the Act as appropriate.

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Agenda Item IMD1

INDIVIDUAL EXECUTIVE MEMBER DECISION

REFERENCE IMD: 2024/06

TITLE	IEMD – Competence and Conduct for Social Housing Managers
DECISION TO BE MADE BY	Leader of the Council and Executive Member for Housing - Stephen Conway
DATE, MEETING ROOM and TIME	19 March 2024 LGF3, 11:30am
WARD	(All Wards);
DIRECTOR / KEY OFFICER	Director, Place and Growth - Giorgio Framalico

PURPOSE OF REPORT (Inc Strategic Outcomes)

To approve Wokingham Borough Council and Loddon Homes' response to the Government's consultation titled 'Competence and Conduct Standard for social housing', for submission by 4th April 2024. This consultation seeks feedback from local authorities regarding government's proposals to introduce a new, regulatory standard relating to the competence and conduct of social housing staff.

RECOMMENDATION

That the Executive Member for Housing and Partnerships authorises Wokingham Borough Council to respond to this consultation as set out in Enclosure I of this report.

SUMMARY OF REPORT

This report summarises the response which Wokingham Borough Council intends to submit to central Government through this consultation. The proposed regulatory standard aims to enhance the service quality with the introduction of a code of conduct policy within the social housing sector. Our proposed response addresses concerns including funding, timeframes for qualification attainment, procedures for non-compliance, training requirements, time commitment, wellbeing for staff and requests more guidance on the proposed code of conduct.

Background

The government is committed to ensuring that every social housing resident has access to decent, safe, and secure housing, along with high-quality services from their landlords. However, shortcomings in these areas persist for many residents across the country. In response, the government has intensified efforts to improve standards in the social housing sector, particularly following the Grenfell Tower fire in 2017 and the avoidable death of two-year-old Awaab Ishak in 2020 due to black mould in his social housing flat, the need to improve standards and professionalism within the sector became an urgent government priority.

Evidence from the Grenfell Inquiry highlighted deficiencies in staff training and professionalism, with reports of residents' concerns being disregarded and unacceptable behavior from some staff members. Additionally, poor leadership within social housing organisations has been identified as a concern. A review of professional training and development in the sector concluded that a major culture change was necessary, with a focus on qualifications and standards for senior housing staff.

As a result, the Social Housing (Regulation) Act was amended to propose a new Competence and Conduct Standard for staff in the social rented sector, including requirements for senior housing managers and executives. The consultation sets out detailed policy proposals for this new standard, including draft directions to the Regulator and a draft policy statement outlining qualification requirements for senior managers and executives. Key elements of the proposed standard include the development of written policies for managing and developing staff skills and conduct, as well as the adoption of appropriate codes of conduct within social housing organisations.

Business Case (including Analysis of Issues)

The Council's stance throughout our responses to the consultation, is that whilst we broadly agree with the proposals, the government should provide more prescriptive guidance on the proposed reforms. This would ensure consistency and clarity in standards across the sector.

The Council has several concerns that will be raised as part of our response to this consultation. This includes:

1. Uncertainty in Case of Non-Compliance:

Ensuring clarity on actions housing providers should take in case of non-compliance with qualification requirements is paramount. Without clear guidance, there is a risk of inconsistency, potentially disrupting service delivery.

2. Proportionality of Training Requirements:

We request the government provides clarity on ensuring that training requirements align with practical needs without imposing undue burden. Setting qualifications too high could limit the pool of capable candidates for these roles.

3. Staff Well-being:

Mandating additional qualifications may add to workload and stress levels, potentially leading to burnout. Our consultation response requests that the

government acknowledge capacity issues for senior staff as part of the development of these proposals.

4. Feasibility of Time Commitment:

Given existing workload pressures, our response requests that the feasibility of time commitments within existing capacity is assessed to enable qualification attainment in tandem with current workloads. Adjustments to workload distribution or additional support may be necessary.

These concerns have been detailed in our proposed responses to the consultation in Enclosure I of this report.

Overall, implementing the Competence and Conduct Standard for social rented sector staff is an important step to improve service quality. However, we request that the government addresses a variety of areas. This includes further clarity on the proportionality of requirements, considering staff well-being, accessing to grant funding and providing clear guidance on how to implement the code of conduct.

FINANCIAL IMPLICATIONS OF THE RECOMMENDATION

The Council faces unprecedented financial pressures as a result of; the longer term impact of the COVID-19 crisis, Brexit, the war in Ukraine and the general economic climate of rising prices and the increasing cost of debt. It is therefore imperative that Council resources are optimised and are focused on the vulnerable and on its highest priorities.

	How much will it Cost/ (Save)	Is there sufficient funding – if not quantify the Shortfall	Revenue or Capital?
Current Financial Year (Year 1)	N/A	N/A	N/A
Next Financial Year (Year 2)	£16,400	Shortfall – £16,400	Revenue
Following Financial Year (Year 3)	£16,400	Shortfall - £16,400	Revenue

Other financial information relevant to the Recommendation/Decision

The financial information outlined in this section is the result of a high-level review to understand the costs to the Council if this policy is implemented without further change. It is important to note that the submission of this consultation response itself will have no financial impact to the Council. However, we have detailed the calculated impact should the law be enacted as this will form part of our consultation response related to the government's request for an impact assessment. The results of our high-level review are included below:

The average cost is calculated by observing lower and upper bound cost range to identify the cost per financial year (year 2 and year 3). This is because the proposals do not become law until April 2025 (year 2).

The high-level review, completed using the figures issued in impact assessment of the consultation suggest that the cost per year to the Council for implementing these proposals from April 2025 is estimated to be £16,400.

Cross-Council Implications (how does this decision impact on other Council services, including property and priorities?)

The implementation of the Competence and Conduct Standard for Social Rented Sector Staff will indeed have a significant impact on cross-council functions, particularly within the housing sector. The substantial financial investment required for implementing these new requirements would reduce the resources available for building and maintaining our social housing stock in the borough. The potential impacts of these proposed changes have been detailed below:

- **Financial Constraints:** The estimated cost range (£23,840 to £41,760) for qualification requirements represents a significant financial burden for the council. Funding these qualifications from the Housing Revenue Account would divert resources away from critical housing initiatives, potentially impacting the council's ability to address housing needs within the community.

- **Staff well-being and capacity:** Mandating additional qualifications may increase workload and stress levels for housing staff, leading to potential burnout. This can negatively affect staff morale, productivity, and the overall quality of housing services provided to residents.
- **Compliance Challenges:** Uncertainty surrounding non-compliance with qualification requirements poses challenges for housing providers. Clear guidance from the government is essential to ensure consistency and prevent disruptions in service delivery across councils.
- **Proportionality of Training:** It's crucial to ensure that training requirements align with practical needs without imposing undue burden. Setting qualifications too high could limit the pool of capable candidates for housing roles, impacting the council's ability to recruit and retain qualified staff.

Public Sector Equality Duty
 As part of this decision, due regard has been taken to the Public Sector Equality Duty. The equalities implications of the recommendation were discussed, and an Initial Equality Impact Assessment (Stage 1) document has been completed accordingly as per Enclosure 2.

SUMMARY OF CONSULTATION RESPONSES	
Director – Resources and Assets	
Monitoring Officer	
Leader of the Council	

For Highways use only	
<i>If your item is not about highways matter you do not need to complete the Town and Parish Council information or the Local Ward Member information</i>	
Town and Parish Councils	
Local Ward Members	

Reasons for considering the report in Part 2
 That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for this item of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 1 of Part 1 of Schedule 12A of the Act as appropriate.

List of Background Papers
Enclosure I – Proposed Consultation Responses
Enclosure II – Stage 1 Equalities and Impacts Assessment

Private: Information that contains a small amount of sensitive data which is essential to communicate with an individual but doesn't require to be sent via secure methods.

Appendix 1 - Exempt Part 2

Contact Ruby Shekhawat	Service Place Commissioning
Telephone No 01182378501	Email ruby.shekhawat@wokingham.gov.uk

Section 1: The broad Standard relating to the competence and conduct of all social housing staff

Question 1: Do you agree with the content of the direction (Annex A) to setting the broad Standard relating to the competence and conduct of all social housing staff?

Yes

No, please specify which aspects you don't agree with and explain why

Whilst the Council and Council Housing company Loddon Homes agrees that it is important to have the right people with the right qualifications in the social housing sector, there are a number of areas where greater clarity is required. This has been outlined below:

- **Lack of Clarity on Funding:** The government needs to provide clarity on whether they will fund the implementation of these standards. Without adequate funding, it will be challenging for housing providers to meet these requirements effectively.
- **Insufficient Timeframe for Qualifications:** A 24-month timeframe for staff to attain qualifications may be too short. We request a longer timeframe to ensure that staff have adequate time to attain the necessary qualifications without unnecessary pressure.
- **Uncertainty in Case of Non-Compliance:** There needs to be clarity on what actions housing providers should take in the event that a staff member does not complete a qualification in time or refuses to do so. Clear guidance from the government is essential to address these scenarios effectively. Seeking further guidance on the requirements as a managing agent and complexities within SLAs. Furthermore, a greater clarity on prior learning and the contributions can make to qualifications.
- **Proportionality of Training Requirements:** It's crucial to ensure that the amount of training required is proportionate to the standard expected. We need assurance that the training requirements are realistic and achievable without imposing undue burden on housing providers. Furthermore, while senior housing managers and executives play crucial roles, we will appreciate clarification on individuals at the director level who provide strategic direction to housing managers and executives. Some elucidation is needed from the government to identify individuals at all levels with significant roles in housing management needing the qualification.
- **Lack of Prescriptive Guidance on Code of Conduct:** We believe that the government should be more prescriptive in setting a standard Code of Conduct for the entire sector. This will ensure consistency and clarity in expectations across the board, benefiting both staff and residents.
- **Future Staffing Challenges:** Anticipated challenges may arise regarding future staffing, particularly concerning individuals nearing retirement who may opt for early retirement instead of completing the qualification and continuing to work for the council. This could impact succession planning and workforce stability, especially if the council encourages staff to commit to working for the council after completing sponsored qualifications.

Section 2: Who is in scope of the qualification element of the Competence and Conduct Standard

Question 2: As set out in paragraphs 15a and 46b of the policy statement, do you agree that only individuals who have a substantive role in managing delivery of housing management services should be in scope of the qualification requirements?

Yes

No, please explain why

We request that the proposals consider both the qualifications required and the experiences of individuals. Calculating the experiences of individuals alongside the qualifications they need to attain can provide a more comprehensive understanding of their capabilities and suitability for senior housing management roles. This holistic approach ensures that competency is evaluated based on both theoretical knowledge and practical experience, leading to more well-rounded and effective housing managers. Therefore, we believe that further consideration and clarification are needed to ensure that the qualification requirements align with the practical realities and needs of the housing sector.

Question 3: Do you agree with the guidance on the scope of housing management services (paragraphs 1-3 of Annex B1)?

Yes

No, please explain why

Question 4: In addition to the definitions provided within legislation, does the guidance at Annex B1 of the policy statement on which functions will be in scope provide sufficient clarity to enable you to assess which individuals within your organisation will need to gain a qualification?

Yes

No, please explain why and specify whether your answer relates to a senior housing manager, senior housing executive, or both

Senior housing managers and executives play crucial roles, we will appreciate clarification on individuals at the director level who provide strategic direction to housing managers and executives. Some elucidation is needed from the government to identify individuals at all levels with significant roles in housing management needing the qualification.

The guidance in Annex B1 does not offer sufficient clarity to answer this question. One area where we seek greater clarity is whether elected members who are involved in housing management and strategy are also expected to attain these qualifications, given their significant involvement in decision-making and oversight within the housing sector.

Question 5: Do you think that there are any other functions not listed above which should be in scope?

Yes, please state which functions and specify whether your answer relates to a senior housing manager, senior housing executive, or both

No

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

Yes, please state which functions and specify whether your answer relates to a senior housing manager, senior housing executive, or both

No

Question 7: Does Chapter 5 and section 6.5 of the policy statement relating to exemptions and paragraphs 18 – 21 of Annex B1 of the policy statement provide sufficient clarity to help you to assess which individuals within your organisation will not be in scope of the qualification requirement?

Yes

No, please explain what further clarity is needed

Question 8: Do you agree with the proposal outlined above that individuals must have been in their role for more than 6 months to be classed as a Relevant Person or Relevant SP Manager (except where they are subject to a probationary period) as detailed in paragraph 15c, 46d and 46e of the policy statement?

Yes

No, the threshold should be less than 6 months (please explain why and specify how long)

No, the threshold should be above 6 months (please explain why and specify how long)

Maintaining the threshold at more than 6 months is reasonable as it allows individuals to gain sufficient experience and understanding of their roles before being classified as Relevant Persons or Relevant SP Managers. This ensures that those in these positions have a solid foundation of knowledge and expertise to effectively carry out their responsibilities.

Question 9: Do you agree with the proposal that those staff who have a probation period should have, or be working towards, a qualification within 9 months from the point at which they take up their role as detailed in paragraph 15d and 46f of the policy statement?

Yes

No, please explain why and your alternative suggestion

Question 10: Do you agree with our proposal that unpaid volunteers should not be required to gain a relevant qualification as detailed at paragraphs 15b and 46c?

Yes

No, please explain why

Question 11: Do you assess that any of your unpaid volunteers undertake roles which meet the criteria set out above in Chapter 2 and the guidance in Annex B1 of the policy statement?

Yes

No

Before providing an assessment, we would appreciate further clarification on whether the qualifications outlined in the policy statement extend to executive housing members and councillors who are unpaid. Given their involvement in housing management, understanding their inclusion or exemption from these requirements would greatly inform our evaluation process. Clarification on this matter would help ensure a comprehensive assessment of the roles and responsibilities of all individuals involved in housing management within our organisation.

Section 3: Criteria that qualifications must meet

Question 12: As outlined in section 3.1 of the policy statement, do you agree that a level 4 qualification is the correct level for a senior housing manager and individual who is a services provider?

Yes

No, please explain why

We would request that experience in the housing sector is considered as to whether the individual requires a qualification, or whether an end point assessment can be taken if sufficient experience can be proven. Additionally, there are a number of other concerns, outlined below, that require more clarity which will assist us in understanding the impacts of this proposals:

- **Uncertainty in Case of Non-Compliance:** There needs to be clarity on what actions housing providers should take in the event that a staff member does not complete a qualification in time or refuses to do so. Clear guidance from the government is essential to address these scenarios effectively. Without this clarity, there is a risk of confusion and inconsistency in how non-compliance is handled, potentially leading to disruptions in service delivery.
- **Proportionality of Training Requirements:** The amount of training required should be proportionate to the standard expected. We need assurance that the training requirements are realistic and achievable without imposing undue burden on housing providers. Setting the qualification level too high may create barriers to entry for talented individuals who may not have the means or resources to attain such qualifications, ultimately limiting the pool of capable candidates for these roles.
- **Well-being Aspect for Individuals:** Mandating additional qualifications may add to the already significant workload and stress levels experienced by housing managers. Considering the well-being aspect for individuals is crucial, as adding further demands could lead to burnout and decreased job satisfaction among staff.
- **Feasibility of Time Commitment:** Housing managers are often already overburdened with their existing responsibilities. It's important to consider the feasibility of taking one day out of the working week to pursue qualifications. This could potentially impact their ability to effectively carry out their duties and may require adjustments to workload distribution or additional support measures to accommodate the time needed for qualification attainment.
- **Future Staffing Challenges:** Anticipated challenges may arise regarding future staffing, particularly concerning individuals nearing retirement who may opt for early retirement instead of completing the qualification and continuing to work for the council. This could impact succession planning and workforce stability, especially if the council encourages staff to commit to working for the council after completing sponsored qualifications.

In recommendation, it is requested that the consultation accounts for both the qualifications required and the experiences of individuals. Calculating the experiences of individuals alongside the qualifications they need to attain can provide a more comprehensive understanding of their capabilities and suitability for senior housing management roles. This holistic approach ensures that competency is evaluated based on both theoretical knowledge and practical experience, leading to more well-rounded and effective housing managers.

Therefore, we believe that further consideration and clarification are needed to ensure that the qualification requirements align with the practical realities and needs of the housing sector.

Question 13: As outlined in section 3.1 of the policy statement, do you agree that a level 5 qualification or a foundation degree is the correct level for a senior housing executive?

Yes

No, please explain why

No, we disagree with the proposal that a level 5 qualification is the correct level for a senior housing executives and individual who is a services provider, as outlined in section 3.1 of the policy statement. This is for the same reasons as outlined in our response to Question 12 of this consultation.

Question 14: Do you agree with our proposals outlined above and in section 3.4 of the policy statement that qualifications can be regulated by an equivalent body to Ofqual or a predecessor body?

Yes

No, please explain why

Yes, we agree that qualifications regulated by equivalent bodies to Ofqual or predecessor bodies should be considered relevant. This approach acknowledges the diversity of qualifications across regions and over time, ensuring fairness and inclusivity in assessing housing staff competency.

Question 15: Do you agree that the criteria that qualifications must meet as set out in section 3.2 of the policy statement is appropriate for ensuring senior housing managers and senior housing executives gain the skills, knowledge, experience and behaviours they need to deliver high quality and professional services to tenants?

Yes

No, please explain why and specify whether your objection relates to a senior housing manager, senior housing executive, or both.

We request that both the qualifications required and the experiences of individuals is accounted for when understanding who is required to complete qualifications. Calculating the experiences of individuals alongside the qualifications they need to attain can provide a more comprehensive understanding of their capabilities and suitability for senior housing management roles. This holistic approach ensures that competency is evaluated based on both theoretical knowledge and practical experience, leading to more well-rounded and effective housing managers.

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

Yes

No, please explain what further information is needed and specify whether your response relates to a senior housing manager, senior housing executive, or both.

Section 4: What constitutes 'working towards' a qualification for the staff of both registered providers and services providers

Question 17: Do you agree with our approach to defining what it means to be 'working towards' a relevant qualification as outlined in the policy statement?

Yes

No, we do not agree with the approach to defining what it means to be 'working towards' a relevant qualification as outlined in the policy statement.

Our concerns are about the timeline for qualification completion as a 24-month timeframe for staff to attain qualifications may be too short. We request a longer timeframe to ensure that staff have adequate time to attain the necessary qualifications without unnecessary pressure. Extending the timeline can provide individuals with the necessary flexibility to balance their work responsibilities and educational pursuits effectively, ultimately leading to a more sustainable and successful outcome.

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

Yes

No, please explain which aspect is not clear and why

Section 5: Transition period

Proposal 12 outlines a transition period of 24 months for social housing sector staff to obtain or work towards relevant qualifications, ensuring improved service quality while mitigating disruptions. At least half of affected individuals must be progressing within the first 12 months.

Question 19: Considering the costs and benefits outlined within the impact assessment, do you agree that all existing staff within the sector should have, or should begin working towards a relevant qualification within 24 months as outlined in section 4.1 of the policy statement?

Yes

No, please specify the length of transition period that you think would be necessary in months

No, we do not agree that all existing staff within the sector should have or should begin working towards a relevant qualification within 24 months as outlined in section 4.1 of the policy statement.

Given the financial constraints faced by councils, with limited budgets for staff development ranging between 10k-15k and considering the significant time and cost investment required for full-fledged housing qualifications, a 24-month transition period may not be feasible. Additionally, there are concerns about the potential impact on council budgets when individuals who are required to work with the council post-completion of their qualification leaving the council.

Therefore, we propose a longer transition period to allow for a more gradual implementation of qualification requirements while ensuring that staff have adequate time to acquire the necessary qualifications without undue financial strain on councils. We suggest extending the transition period to 36 transition period in months to strike a balance between meeting qualification requirements and managing budgetary constraints effectively.

Question 20: Do you have any additional comments or evidence about the potential impact of the policy proposals as assessed in our impact assessment (Annex C)?

Yes – please explain

No

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

Yes

No, please explain why

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

Yes

No, please specify the length of transition period in months that you believe would be necessary to meet this demand.

Whilst we support the broad aims of this policy change, we may find it challenging to commit to enrolling learners on qualifications within the proposed 24-month transition period. We seek further clarification from the government on funding availability, the need for an extended timeframe for qualification attainment, clear procedures for addressing non-compliance, and assurance on the proportionality of training requirements. Clarity on these points will enable us to effectively plan and allocate resources, ensuring a successful implementation process.

Section 6: Transitional arrangements for partially compliant qualifications and apprenticeships

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

Yes

No – please explain why

Question 25: Where your course does not cover all the criteria listed above, do you plan to update your qualifications to ensure that you cover the proposed course content requirements?

Yes

No, please explain why

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

Yes

No – please explain why

Yes, we agree with the proposal as outlined above, with one suggestion for improvement. We suggest that the end point assessment should provide professional qualification status. This adjustment ensures that apprentices who successfully pass the end point assessment not only fulfil transitional requirements but also hold a recognised professional qualification status, enhancing their credentials and the credibility of the apprenticeship program.

Section 7: Requirements for registered providers in respect of the relevant managers of services providers

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

Yes

No, please explain what further clarity is needed

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

Yes

No, please explain what further clarity is needed

Question 29: Does the guidance in Annex B2 of the policy statement enable you to understand what the implications of these requirements are for your organisation and your obligations under the terms implied by section 217A of the Housing and Regeneration Act 2008?

Yes

No, please explain what further clarity is needed

Further clarity is needed regarding how the bodies mentioned in Annex B2 of the policy statement, such as the National Federation of ALMOs and the National Federation of TMOs, will assess councils in relation to the requirements for Relevant SP Managers to have or work towards relevant qualifications. Specifically, we require clarification on the parameters and criteria these bodies will use to evaluate councils' compliance with these requirements. Understanding how these assessments will be conducted will help our organization better understand its obligations under the terms implied by section 217A of the Housing and Regeneration Act 2008.

Question 30: Does the information provided in Chapter 6 of the policy statement enable you to understand the requirements placed on registered providers in relation to services providers?

Yes

No, please explain what further clarity is needed

Question 31: Are there any other bodies representing the interests of services providers that you think the Secretary of State should nominate as a body with which the Regulator must consult on the regulatory Standard in relation to these requirements, other than the National Federation of ALMOs and the National Federations of TMOs?

Free Text: _____

Question 32: Are there any other issues you want to raise, or anything you believe has not been considered in relation to proposals 16 and 17?

Free text: _____

Section 8: Questions related to the impact assessment

Question 33: In paragraph 64 of the impact assessment, we have set out our assumptions around the familiarisation / implementation costs to registered providers and services providers for the implementation of the full Competence and Conduct Standard including the qualification element of the Standard? Do you agree with these assumptions?

- Yes
- No – please explain why and provide an alternative
- Don't know

Question 34: How many people have you identified as being in scope of the full Competence and Conduct Standard (not just the qualification element of the Standard)? This would be all individuals involved in the provision of services in connection with the management of social housing.

Number: _

Question 35: Based on the information provided in the policy statement and associated guidance, how many individuals within your organisation have you assessed to be in scope of the qualification requirements?

Number: ____

Question 36: How many of those individuals have you assessed to be senior housing managers?

Number: ____

Question 37: How many of those individuals have you assessed to be senior housing executives?

Number: ____

Question 38: Having read the requirements set out in Chapter 3 of the policy statement, how many and what percentage of your existing in-scope staff already possess a qualification which is deemed to be a relevant qualification?

Please provide the number and percentage of staff: _____

Question 39: How many individuals within your organisation that you assess to be in scope currently have a partially relevant qualification (which meets or exceeds the requirements in 3.1 but does not meet all the course content criteria at 3.2) and would be in a position to undertake accredited training / CPD to meet the remaining criteria?

Number: ____

Question 40: Please specify whether you pay the apprenticeship levy

Yes

No

Prefer not to say

Question 41: How many, and what proportion, of those you have assessed to be in scope of the requirements and who need to gain relevant qualification plan to meet these requirements by completing an apprenticeship programme with a qualification element?

Apprenticeship programme with a qualification element:

Number of staff: _____

Percentage of staff: _____

Qualification (without an apprenticeship programme)

Number of staff: _____

Percentage of staff: _____

Question 42: How many services providers do you have a direct agreement with for managing the delivery of housing management services to your tenants? What size are your services - micro (less than 10 employees), small (less than 50 employees, medium (less than 250 employees) or large organisation (250 or more employees) and what types of services do they deliver?

Number of services providers: _____

Size of your services providers _____

Services they deliver _____

Question 43: Where you manage delivery of housing management services on behalf of a registered provider, do you contract out aspects of the management of these services to other providers? If yes, please could you provide details of the number of sub-contractors used, types of services delivered and the size of these sub-contractor organisations (please note this question only applies to the management of the delivery of services, rather than to the delivery of services)

Number of sub-contractors: _____

Size of sub-contractors _____

Services they deliver _____

Question 44: We have made an assumption that where people undertake a qualification (not as part of an apprenticeship programme), this will require a commitment from the learner of 8 hours per week over approximately 12 months for both level 4 and 5. This will amount to around 320 hours of

study for senior housing executives and 360 hours of study for senior housing managers in total. Do you agree with this assumption?

Yes

No, please explain and tell us what you estimate the number of hours commitment that will be required from the learner per week and over what period for both senior housing managers and senior housing executives.

Don't know

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Equality Impact Assessment (EqIA) form: the initial impact assessment

1. Process and guidance

The purpose of an EqIA is to make sure that the council is meeting the needs of all our residents by ensuring we consider how different groups of people may be affected by or experience a proposal in different ways. EqIAs help us to meet our [Public Sector Equality Duty](#) and where applicable the [Armed Forces Duty](#)

The council has a two stage EqIA process:

- Stage 1 - the initial impact assessment
- Stage 2 - the full impact assessment.

This form is for use at Stage 1 of the process. This must be completed when undertaking a project, policy change, or service change. It can form part of a business case for change and must be completed and attached to a Project Initiation Document. The findings of the initial impact assessment will determine whether a full impact assessment is needed.

Guidance and tools for council officers can be accessed on the council's [Tackling Inequality Together](#) intranet pages.

Date started:	27.02.2024	
Completed by:	Ruby Shekhawat	
Service:	Economy and Housing	
Project or policy EqIA relates to:	Consultation on Changes to Conduct and Competence for Social Housing Mangers	
Date EqIA discussed at service team meeting:	22.02.2024	

Conclusion (is a full assessment needed?):	No	
Signed off by (AD):	Rhian Hayes	
Sign off date:		

2. Summary of the policy, project, or service

This section should be used to summarise the project, policy, or service change (the proposal).

What is the purpose of the proposal, what are the aims and expected outcomes, and how does it relate to service plans and the corporate plan?

To agree on Wokingham Borough Council's response to the Government's consultation on proposed changes to code and competence for social housing managers. These proposals have been extracted below:

1. Proposal 1 introduces a Standard to ensure social housing staff's competence and conduct. Registered providers must maintain written policies for staff development, performance appraisal, and addressing poor performance. They must also adopt a code of conduct tailored to individual roles, with a focus on relevant knowledge and skills.
2. Proposal 2 focuses on defining "Relevant Persons" and "Relevant SP Managers" as those with substantive roles in managing housing management services for social housing tenants, clarifying that only staff with significant responsibilities in this area require relevant qualifications.
3. Proposal 3 clarifies the roles and responsibilities of senior housing managers and executives in delivering housing management services. It outlines specific functions they oversee, such as customer services, complaints management, and strategic direction, providing guidance for qualification requirements based on job functions rather than titles.
4. Proposal 4 outlines exemptions for certain managerial roles not directly involved in delivering services to tenants, such as finance teams. However, roles combining back-office tasks with housing management responsibilities remain within scope for qualification requirements.
5. Proposal 5 Individuals become Relevant Persons or Relevant SP Managers once they have been in their current role for more than 6 months (except where there is a probation period applicable to the role in which case different rules apply)
6. Proposal 6 Where there is a probation period applicable to a person's role, they will need to have, or be working towards, a relevant qualification within 9 months from the point at which they take up their role.
7. Proposal 7 To avoid undue burden on small housing providers governed by volunteers, unpaid volunteer officers will not need to obtain relevant qualifications.

8. Proposal 8 suggests qualifications for senior housing managers and executives: Level 4 for managers and Level 5 or a foundation degree for executives. Higher qualifications meeting specific criteria exempt individuals from additional qualifications.
9. Proposal 9 is not relevant to WBC.
10. Proposal 10 outlines criteria for relevant qualifications in housing management. For senior housing managers, courses should cover professional practice, tenant needs, customer service, housing law, policy, and organizational policies. Senior housing executives' courses should include ethics, professional practice, customer service, strategic planning, leadership, and stakeholder management. Soft skills like tenant engagement and respectful customer service are emphasized.
11. Proposal 11 defines when senior housing managers and executives are working towards a qualification. Enrolment and progression timelines for qualification completion start within 6 months of enrolment but may extend to 12 months in cases where no course start date is available. Completion should align with the time limit or estimate set by the qualification's provider, typically within two years.
12. Proposal 12 outlines a transition period of 24 months for social housing sector staff to obtain or work towards relevant qualifications, ensuring improved service quality while mitigating disruptions. At least half of affected individuals must be progressing within the first 12 months.
13. Proposal 12 During the transition period, partially compliant qualifications require additional accredited training to cover remaining criteria. Staff with technical qualifications can supplement learning with accredited modules. After the transition, qualifications must fully meet criteria. Providers are encouraged to update courses accordingly.
14. Proposal 13 During the transition period, senior housing managers without a qualification from an apprenticeship program will be compliant if they pass the end point assessment, meet level 4 standards, and fulfil course content requirements. Apprenticeship's meeting criteria are considered progress towards qualification.
15. The Competence and Conduct Standard holds services providers accountable for staff qualifications. Registered providers must ensure Relevant SP Managers of services providers have or work towards relevant qualifications. Implied terms in agreements enforce this requirement. Registered providers must inform services providers of their obligations and ensure subcontractors comply. The criteria and transition periods for qualifications apply similarly to Relevant SP Managers as to Relevant Persons.

How will the proposal be delivered, what governance arrangements are in place and who are the key internal stakeholders?

The proposal consists of a consultation response, so delivery of this will consist of submitting the response through the online consultation form, once the submission has been agreed through the Individual Executive Member Decision taken by the Executive Member for Housing and Partnerships.

Who will be affected by the proposal? Think about who it is aimed at and who will deliver it.

The decision to submit our consultation response will have no impact on those with protected characteristics as there is no guarantee that our consultation response will influence government policy. However, in Section 3 we have detailed how we expect protected groups to be affected if the proposed policy changes were to be implemented.

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3. Data & Protected Characteristics

This section should be used to set out what data you have gathered to support the initial impact assessment.

The table below sets out the equality groups that need to be considered in the impact assessment. These comprise the nine protected characteristics set out in the Equality Act 2010 and other priority areas defined by the council.

Age	Armed Forces Communities	Care Experienced People	Disability
Gender Reassignment	Marriage and Civil Partnership	Pregnancy/Maternity	Religious belief
Race	Sex	Sexual Orientation	Socio-economic disadvantage

The Armed Forces Act 2021 requires consideration of the [impact on Armed Forces Communities](#) when exercising certain housing, education or healthcare functions (excluding social care). Further guidance can be found [here](#).

What data and information will be used to help assess the impact of the proposal on different groups of people? A list of useful resources is available for officers on the Council’s Tackling Inequality Together intranet pages.

The information used to understand the impact of the proposal on different groups is the data and experiences provided by WBC officers.

4. Assessing & Scoring Impact

This section should be used to assess the likely impact on each equality group, consider how significant any impacts could be and explain how the data gathered supports the conclusions made.

Scoring impact for equality groups	
Positive impact	The proposal promotes equality of opportunity by meeting needs or addressing existing barriers to participation and/or promotes good community relations
Neutral or no impact	The proposal has no impact or no disproportionate impact.
Low negative	The proposal is likely to negatively impact a small number of people, be of short duration and can easily be resolved.
High negative	The proposal is likely to have a significant negative impact on many people or a severe impact on a smaller number of people.

Referring to the Scoring table above, please give an impact score for each group, explain what the likely impact will be, and briefly set out how the data supports this conclusion.

Equality group	Impact score	Impact and supporting data
Age	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Disability	High negative impact	Impact on Staff: Qualitative data from WBC officers indicates that mandating additional qualifications could exacerbate the already substantial workload and stress levels experienced by housing managers, potentially leading to long-term health conditions. It's crucial to consider the well-being aspect for individuals, as this added stress could have a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Moreover, these additional demands could contribute to burnout and decreased job satisfaction among staff
Gender reassignment	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Marriage and Civil Partnership	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Pregnancy/Maternity	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Religious belief	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Race	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Sex	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Sexual Orientation	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Socio-economic disadvantage	High Negative impact	Impact on Residents: Firstly, the proposed legislation aims to elevate the standard of service delivery within social housing, aiming to create a more positive and supportive environment for tenants, ultimately enhancing their overall quality of life. However, funding these qualifications from the Housing Revenue Stock Account could divert resources away from critical housing initiatives, potentially impairing the

		council's ability to address housing needs within the community. Ultimately, this could delay or hinder support for residents in need, exacerbating housing challenges for the most vulnerable individuals in the borough
Armed Forces Communities	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.
Care Experienced People	Neutral/no impact	There is no suggestion that these proposed policy changes would have any impact on this protected characteristic.

5. Conclusion and next steps.

Based on your findings from your initial impact assessment, you must complete a full impact assessment if you have identified any groups as having a low or high negative impact.

If no impact, or a positive impact has been identified, you do not need to complete a full assessment. However, you must include reference to the initial assessment in any associated reports, and it must receive formal approval from the Assistant Director responsible for the project, policy, or service change.

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By virtue of paragraph(s) 1 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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