

## 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 complications 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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