

Competence, Learning and Development Policy



Policy Name	Competence, Learning and Development
Policy Reference	GOV07
Effective Date	1 October 2026
Approved By	Harbour Light Board
Approval Date	17 September 2026
Policy Owner/Dept	Governance
Policy Author	Peter McEleavey
Review Date	Annually, or sooner following material regulatory or organisational change
Version Number	1.0

Version	Date	Changes	Approver

Relevant National Standards or Regulations	• Regulator of Social Housing – Competence and Conduct Standard • Regulator of Social Housing – Consumer Standards Code of Practice • Government Policy Statement on Qualifications Requirements for Social Housing • Regulator of Social Housing – Transparency, Influence and Accountability Standard
---	--

Relevant Legislation	• Housing and Regeneration Act 2008, as amended • Social Housing (Regulation) Act 2023 • Equality Act 2010 • Employment Rights Act 1996
-----------------------------	--

Competence, Learning and Development Policy



1. Purpose

Harbour Light Assisted Living CIC (“Harbour Light”) is committed to ensuring that staff involved in providing landlord services have the skills, knowledge, experience and behaviours necessary to provide good-quality services to tenants.

This policy sets out Harbour Light’s approach to:

- identifying and maintaining the competence required for different roles;
- staff learning and development;
- regularly reviewing staff performance;
- identifying and addressing poor performance;
- meeting applicable housing-management qualification requirements; and
- taking appropriate steps to obtain assurance about the competence and conduct of relevant staff employed by organisations providing services on Harbour Light’s behalf.

This policy supports compliance with the Regulator of Social Housing’s Competence and Conduct Standard, which takes effect on 1 October 2026. The Standard requires registered providers to have a written policy covering these matters.

Harbour Light is a micro housing provider with a small management and frontline team. Its arrangements will therefore be proportionate to the size and complexity of the organisation while ensuring that regulatory requirements and tenant outcomes are not compromised.

2. Scope

This policy applies to Harbour Light staff who are involved in the provision of landlord services.

This includes, as relevant to their roles:

- the Chief Executive;
- Estate Operations Manager;
- Maintenance Manager;
- Compliance Manager;
- Finance Manager;
- Maintenance Operatives;
- Gardens Manager; and
- any other employee who undertakes landlord-service functions.

Different roles require different types and levels of competence. Harbour Light will not apply an identical training or development programme to every employee.

The policy also applies to Harbour Light’s arrangements with Support Companies, contractors and other service providers to the extent that their staff perform landlord-service functions on Harbour Light’s behalf.

Support Companies principally provide independently commissioned care and support services. This policy does not make Harbour Light responsible for assessing competence in the delivery of those care

Competence, Learning and Development Policy



or support services. It applies only to relevant landlord-service functions carried out on Harbour Light's behalf.

3. Responsibilities

Board

The Board is responsible for obtaining proportionate assurance that Harbour Light has appropriate arrangements to meet the Competence and Conduct Standard and applicable qualification requirements.

Chief Executive

The Chief Executive has overall responsibility for implementation of this policy and for ensuring that appropriate staff performance, development and qualification arrangements are maintained.

Managers

Managers are responsible for:

- identifying the competence required for staff within their areas;
- discussing performance and development needs with staff;
- ensuring mandatory or role-specific training is completed;
- identifying and addressing competence or performance concerns; and
- escalating significant concerns to the Chief Executive.

Because Harbour Light has a small workforce, managers may also undertake frontline functions and are responsible for maintaining their own professional knowledge and competence.

Staff

Staff are expected to:

- perform their duties competently and professionally;
- undertake required learning and development;
- maintain relevant knowledge appropriate to their role;
- identify areas where further training, guidance or support may be required;
- apply learning in their work; and
- comply with Harbour Light's Staff Code of Conduct.

4. Role-based competence

Harbour Light will identify the skills, knowledge, experience and behaviours reasonably required for each role.

The requirements will reflect the employee's actual responsibilities rather than job title alone.

Relevant areas may include:



Competence, Learning and Development Policy

- housing and tenancy management;
- repairs and maintenance;
- property and building safety;
- damp, mould and housing hazards;
- complaints and Housing Ombudsman requirements;
- Consumer Standards;
- safeguarding and vulnerability;
- equality and reasonable adjustments;
- tenant communication and engagement;
- rent, Housing Benefit and income management;
- data protection and information governance;
- health and safety;
- contractor management;
- professional conduct; and
- technical or trade competence relevant to maintenance functions.

Employees are not expected to possess specialist expertise outside their role. Where specialist knowledge is required, Harbour Light may obtain external professional advice or services.

5. Learning and development

Harbour Light will move from an ad-hoc training approach to a simple planned system of learning and development.

Training and development needs may be identified through:

- recruitment and induction;
- annual appraisal;
- changes in legislation or regulatory requirements;
- complaints and tenant feedback;
- incidents, accidents or near misses;
- audits and compliance reviews;
- changes to an employee's duties;
- performance concerns;
- new systems or working practices; and
- requests from individual employees or managers.

Learning may include:

- formal training courses;
- accredited qualifications;
- webinars or briefings;
- toolbox talks;
- professional guidance;
- supervised practical learning;
- mentoring or coaching;

Competence, Learning and Development Policy



- self-directed learning; and
- discussion of regulatory or service-learning material within the management team.

Harbour Light will maintain a proportionate training and development record showing significant mandatory and role-related training undertaken by relevant staff.

The effectiveness of learning will be considered through day-to-day management and performance review. Completion of a training course alone will not necessarily demonstrate competence where an employee cannot apply the learning appropriately in practice.

6. Performance appraisal and review

From 1 October 2026, Harbour Light will introduce a formal annual appraisal for relevant staff.

The appraisal will be proportionate to Harbour Light's small-team structure and will normally consider:

- performance during the previous year;
- principal responsibilities and objectives;
- service quality and tenant outcomes;
- strengths and areas for development;
- competence and conduct;
- training and professional-development requirements;
- relevant regulatory or legislative changes;
- employee feedback and support needs; and
- objectives or priorities for the following year.

Performance will also be discussed during the year where necessary. Harbour Light will not wait for the annual appraisal where an issue requires earlier attention.

The annual appraisal will be recorded and retained securely as an employment record.

For managers who report directly to the Chief Executive, the appraisal will normally be undertaken by the Chief Executive.

Appropriate independent arrangements will be used for review of the Chief Executive's performance, having regard to Harbour Light's governance arrangements and the safeguards relating to the combined Chief Executive and Chair role.

7. Managing poor performance

Harbour Light will seek to address performance concerns promptly, fairly and proportionately.

Where a concern arises, the normal approach will be:

1. Identify the concern

The employee will be told clearly what aspect of their performance or competence is causing concern and what standard is expected.

Competence, Learning and Development Policy



2. Establish the reason

Harbour Light will consider whether the issue relates to matters such as unclear expectations, inadequate training, workload, health or disability, lack of resources, conduct or another underlying factor.

3. Provide appropriate support

This may include additional guidance, supervision, training, reasonable adjustments or clarification of responsibilities.

4. Set improvement requirements

Where appropriate, an improvement plan will record:

- the required improvement;
- support or training to be provided;
- a reasonable timescale;
- how improvement will be assessed; and
- the date of review.

5. Review progress

Improvement will be reviewed and the outcome recorded.

Where satisfactory improvement is not achieved, or where the concern is sufficiently serious, Harbour Light may use a formal capability or disciplinary process. Any formal action will be fair and proportionate and undertaken in accordance with applicable employment law and good employment practice. Specialist HR or legal advice will be obtained where appropriate.

Nothing in this procedure prevents Harbour Light from acting more quickly where serious misconduct, significant safety concerns or other serious circumstances require it.

8. Housing-management qualifications

Harbour Light will identify any employee who falls within the statutory definition of a Senior Housing Executive or Senior Housing Manager and will maintain a record of its assessment.

Where the qualification requirements apply, Harbour Light will ensure that the individual holds, or is working towards, an appropriate qualification within the applicable statutory timescale.

The assessment will be based on actual responsibilities, decision-making authority and involvement in housing-management services rather than job title alone.

Relevant roles will be reviewed when:

- this policy is reviewed;
- responsibilities materially change;
- a new senior employee is appointed; or
- Government or RSH requirements change.



As a Small Registered Provider owning fewer than 1,000 social-housing units, Harbour Light is subject to the Government's adjusted **48-month transition period**. This applies to relevant staff in scope when the Standard takes effect and those who become in scope during the first 36 months. Harbour Light will meet the applicable qualification deadlines and statutory requirements for anyone entering scope later.

A separate qualification assessment/register will record the roles identified as being in scope, the required qualification level, existing qualifications and any actions or deadlines.

9. Service providers and Support Companies

Harbour Light remains responsible for taking appropriate steps to obtain assurance that relevant service-provider staff have the competence and conduct necessary for landlord services carried out on its behalf. Assurance will be proportionate to the landlord functions actually performed. Harbour Light will identify which contractors, Support Companies and other organisations carry out those functions and what assurance is reasonably required.

Harbour Light will take proportionate steps appropriate to those functions. These may include:

- Service Level Agreement provisions;
- clear descriptions of landlord-related responsibilities;
- requirements to follow relevant Harbour Light procedures;
- communication of changes in landlord requirements;
- requests for evidence of relevant training or competence where proportionate;
- investigation of concerns about performance or conduct; and
- corrective action where a service provider's performance could affect tenants or Harbour Light's regulatory compliance.

Support Companies are not treated as a substitute for Harbour Light's own landlord responsibilities.

An exemption from the qualification requirement may apply to managers of service providers that do not provide a comprehensive social-housing management service. It does not remove Harbour Light's broader competence-and-conduct assurance duty for landlord functions they perform.

Where a service provider holds information relevant to Harbour Light's regulatory or STAIRs obligations, Harbour Light will maintain proportionate arrangements to obtain it when required.

10. Staff Code of Conduct

Harbour Light will maintain a separate Staff Code of Conduct applicable to relevant staff.

The Code will establish the behaviours expected when delivering landlord services, including professionalism, respect, fairness, integrity, confidentiality, accountability and appropriate communication with tenants.

The Code will form part of Harbour Light's competence-and-conduct arrangements and will be embedded through induction, management, appraisal and performance processes.



11. Tenant involvement and accessibility

Harbour Light will give tenants meaningful opportunities to influence and scrutinise the development of this policy and decisions concerning the adoption or development of the Staff Code of Conduct.

Engagement will be undertaken in accordance with GOV06 Tenant Involvement, Empowerment and Engagement Policy, using proportionate and accessible methods appropriate to Harbour Light's tenant group.

The policy and Staff Code of Conduct will be:

- made accessible to tenants;
- published or clearly signposted through Harbour Light's website;
- made available in an alternative accessible format where reasonably required; and
- kept under review and updated where necessary.

12. Records and assurance

Harbour Light will maintain proportionate records sufficient to demonstrate operation of this policy, which may include:

- annual appraisals;
- training and development records;
- competence or qualification assessments;
- evidence of qualifications;
- improvement plans where required;
- significant learning arising from complaints or incidents;
- service-provider assurance where relevant; and
- evidence of tenant involvement in development and review of this policy and the Staff Code of Conduct.

The Board will receive proportionate assurance regarding implementation of the Competence and Conduct Standard.

13. Review

This policy will be reviewed at least annually during the initial implementation period and thereafter at an interval determined by the Board, subject to any regulatory requirement.

It will be reviewed sooner where there is:

- a material change to the Competence and Conduct Standard;
- revised Government qualification requirements;
- significant organisational change;
- evidence from complaints, incidents or performance that the policy requires improvement; or
- significant tenant feedback concerning staff competence or conduct.