



DRAFT

Confidence and Conduct Standard

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Policy Author:	Director of People
Approved by:	People Committee
Next review date:	
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Equality Assessment completed:	Yes
Data Protection Impact Assessment required:	Not applicable
This document is uncontrolled when printed	

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For support and advice regarding the policy, please contact the Policy Owner. For queries on the policy register, please contact the Governance Team.

Contents

Policy Statement	3
Equity, Diversity, Inclusion and Belonging	4
Scope, Escalation and Monitoring	5
Scope 5	
Escalation	
Monitoring	5
Core Purpose, Vision and Themes	5
Regulation and Legislation	6
Roles and Responsibilities	7
Definitions	7
Associated Procedures and Processes	8
Policy Detail	8
Performance Monitoring, Reporting and Auditing	9
Board and Committee Key Performance Indicators (KPIs)	12
Internal Audit and Assurance	13
Records	13
Version Control	14

Please note that the Contents page will update automatically from the headings. If you right click on the contents page and select update fields, this will update.

Policy Statement

This policy sets out how Gentoo ensures that all colleagues, managers, contractors and partners delivering housing services have the skills, knowledge, experience and behaviours required to deliver safe, high quality and respectful services to our customers.

It supports Gentoo's commitment to:

- keeping customers safe
- treating people with dignity and respect
- delivering reliable, professional services

The policy ensures compliance with the Regulator of Social Housing's Competence and Conduct Standard and other relevant regulatory and legislative requirements.

Equity, Diversity, Inclusion and Belonging

- We are committed to the principles of equity, diversity, inclusion and belonging throughout the organisation and aim to:
 - Treat everyone equally, fairly, and with respect.
 - Provide fair and equitable outcomes for colleagues and customers.
 - Welcome and value difference and not tolerate discrimination, harassment or victimisation of any individual or groups.
 - Challenge the behaviour of those who do not uphold our values and go against our principles.
 - Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training, or other developmental opportunities.
- We are committed to the principle of diversity and inclusion for all colleagues and customers, regardless of sex, race, religion or belief, age, marriage and civil partnership, pregnancy and maternity, sexual orientation, gender reassignment, or disability.
- This policy and the associated procedures (if applicable) will ensure that customers and colleagues are treated as individuals with fairness and respect. An Equality Assessment has been completed on this policy.

Inclusive behaviours and fair outcomes are integral to professional competence and conduct.

Scope, Escalation and Monitoring

Scope

- The scope of this policy covers Gentoo Group/Gentoo Homes
 - It covers:
 - All colleagues (permanent, fixed-term and temporary)
 - Managers and senior leaders
 - Board members
 - Contractors, agency staff and partners delivering services on Gentoo's behalf (where applicable)

Escalation

- Where the Board or a Committee identifies significant concerns relating to competence or conduct, these must be escalated to the Executive Director of Customer, People and Engagement.
- Colleagues who have concerns must raise them through their line management structure, and if necessary to the Executive Team.
- Where concerns remain unresolved, colleagues should refer to the Whistleblowing provisions within the Group's *Working Professionally Policy*, available on the Gentoo intranet Policy Hub.

Monitoring

- This policy will be reviewed every three years, unless business needs or legislative changes dictate that we review it before this time.
- This policy may be subject to an audit in line with the internal audit plan.
- This policy is a grade 1 and changes will need the approval of the People Committee. .

Core Purpose, Vision and Themes

- Our core purpose is to provide warm, safe and decent home for our customers of today and tomorrow.

- Our vision is to become the best provider of social homes in the country.
- Our values are what we stand for and what we want to be known for. They are what makes us, us.
 - We care about people.
 - We take accountability.
 - We shape the future.
 - We bring leadership.
 - We deliver.
- We live our values in everything we do from the boardroom to the front room, to deliver our priorities for our customers.
- We have identified six themes which will guide the delivery of our services and support the Group's vision and ambitions for the next 10 years.
 - The best provider of social homes in the country.
 - A housing provider that listens and sorts things out.
 - Helping our communities to thrive.
 - Achieving growth through partnerships and innovation.
 - A professional, caring, great place to work.
 - Embracing modern technology and data.

Regulation and Legislation

The Executive Director of Customer, People and Engagement is responsible for ensuring this policy reflects all relevant legislation, regulation and best practice, including:

- Regulator of Social Housing – *Competence and Conduct Standard*
- Housing Act 1985 and 1988
- Social Housing Regulation Act 2023
- Health and Safety at Work etc. Act 1974
- Equality Act 2010
- Employment Rights Act 1996
- Safeguarding legislation and statutory guidance
- Data Protection Act 2018 and UK GDPR
- Housing Ombudsman Complaint Handling Code (where relevant to conduct)

Roles and Responsibilities

- The key roles and responsibilities in Gentoo for this policy are set out below. If applicable, additional responsibilities for this policy are detailed in the relevant supporting procedures.

Role	Key responsibilities
People Committee	Set strategic direction, provide oversight and assurance that competence and conduct standards are met and risks are managed. Ensure appropriate challenge where assurance indicates risk to customers.
Executive Director of People, Customer and Engagement	Executive accountability for compliance with this policy, culture, capability, and professional standards.
Executive Team	Ensure effective implementation of the policy, appropriate resources, capability building and consistent application.
Policy Owner	Maintain the policy, review it in line with requirements, and ensure supporting procedures are in place.
Managers	Ensure colleagues are competent, appropriately trained, supported, and performance or conduct issues are addressed promptly.
Colleagues	Behave in line with Gentoo values, maintain required competence, follow policies and raise concerns where standards are not met.

Definitions

- The following definitions are used throughout this

Competence	The skills, knowledge, experience and capability required to perform a role safely and effectively.
Conduct	Behaviour, actions and professional standards demonstrated when carrying out work on behalf of Gentoo.
Customers	Customers/Tenants, leaseholders and other service users of Gentoo homes and services.
Colleagues	Anyone employed by Gentoo, including permanent, temporary and fixed-term staff.

Contractors and partners

Organisations or individuals delivering services on Gentoo's behalf.

Associated Procedures and Processes

This policy is supported by, but not limited to:

- Ways of Working
- Working Professionally
- Equality Diversity & Belonging
- Colleague Relations
- Code of Conduct
-  Joining Gentoo

Supporting documents are owned by the relevant service area and reviewed in line with agreed cycles.

Policy Detail

Gentoo commitment and principles:

- Ensure colleagues and service providers are competent for their role, with proportionate training, qualifications and ongoing development
- Set clear expectations for professional behaviour and conduct
- Provide effective supervision, support and performance management
- Address poor performance or misconduct promptly and fairly
- Take action where competence or conduct poses a risk to customers, colleagues or compliance
- Promote a learning culture where concerns are raised early and improvements are made
- Contractor assurance arrangements must demonstrate equivalence to Gentoo's competence and conduct expectations.

Expected outcomes:

- Safe services for customers

- Professional, respectful customer interactions
- Improved service reliability and trust
- Regulatory compliance and reduced risk

This framework aligns role expectations with:

- regulatory requirements
- Gentoo values
- customer and safety outcomes

Competence Requirements

Gentoo Competence Framework

Gentoo maintains a Values based competence framework that defines the knowledge, skills, qualifications and behaviours required for key roles, including but not limited to:

- Housing Co-ordinators
- Support Co-ordinators
- Repairs and Maintenance Colleagues
- Asset Management Roles
- Property and Building Safety Specialists
- Senior Leaders responsible for housing services

This framework aligns role expectations with:

- regulatory requirements
- Gentoo values
- Customer and safety outcomes

Qualification Requirements

Where required by regulation or role:

- Senior managers responsible for housing services must hold, or be working towards, Level 4 or Level 5 housing qualifications (or equivalent where appropriate).
- Colleagues delivering housing management services must hold, or be working towards, a recognised housing qualification.

Gentoo will support colleagues to achieve qualifications through:

- professional study
- apprenticeships
- accredited training programmes

Recruitment and Selection

Recruitment and selection processes ensure appointments meet Gentoo's standards for competence, capability and conduct and support a values-led culture.

Candidates are assessed against:

- Required qualifications, experience and technical competence
- Behavioural expectations aligned to the Gentoo Values and Behaviours Framework (Values in Action), using values-led assessment methods appropriate to the role

Pre-employment checks are completed to confirm suitability and may include:

- Qualification and right-to-work verification
- Employment references
- Professional registration checks, where required

This approach ensures colleagues appointed to Gentoo are both technically competent and demonstrate behaviours consistent with our values and regulatory expectations.

Induction

All new starters will complete a structured induction that includes:

- regulatory standards and expectations
- safeguarding responsibilities
- customer engagement and customer standards
- health and safety
- equality, diversity and inclusion
- complaints handling and learning from feedback

Continuous Professional Development (CPD)

Gentoo provides ongoing learning and development opportunities, including:

- mandatory training
- professional qualifications
- skills workshops
- e-learning
- conferences and sector briefings

Colleagues are expected to undertake annual CPD aligned to their role, with learning discussed and reviewed through supervision and Brilliant Conversations..

Professional Conduct

All colleagues must demonstrate behaviours that:

- treat customers with fairness, dignity and respect
- promote customer safety and wellbeing
- act with honesty and professional integrity

Colleagues are expected to raise concerns, learn from mistakes and contribute to continuous improvement

- comply with Gentoo policies, codes of conduct and values

Unacceptable conduct may result in disciplinary action in line with Gentoo procedures.

Performance Management, Monitoring, Reporting and Auditing

Performance Management

Competence is assessed and supported through:

- Brilliant Conversation reviews and any additional supervisions and one to ones
- probation reviews
- skills assessments
- training and compliance dashboards and completion monitoring

Evidence of professional memberships and qualifications

Communications and team meetings

Where gaps are identified, development plans will be agreed and reviewed.

Board and People Committee Key Performance Indicators (KPIs)

To ensure ongoing assurance of colleague competence and conduct, key performance indicators (KPIs) are monitored at operational, People Committee and Board level.

Operational monitoring focuses on day-to-day management of risk and performance and includes:

- Mandatory training completion rates
- Progress against role-critical competency requirements
- Conduct-related employee relations cases, including grievances and disciplinary matters
- Absence levels linked to capability or conduct

- Safeguarding concerns and compliance with safeguarding training
- Recruitment, retention and vacancy levels in critical role.

These KPIs are reviewed regularly by management to identify trends, address emerging risks and agree corrective actions.

People Committee oversight provides assurance on workforce capability and conduct and includes:

- Organisation-wide mandatory training compliance
- Completion of role-critical and regulated competency requirements
- Trends in conduct-related employee relations and safeguarding concerns
- Key workforce capability and retention risks

Board reporting provides strategic assurance and focuses on:

- Overall compliance with mandatory training and competence requirements
- Significant conduct, safeguarding or Ombudsman concerns
- Material workforce risks impacting regulatory compliance or service delivery

KPIs are reported through regular management, People Committee and Board reporting, with clear escalation.

Internal Audit and Assurance

- Compliance with this policy may be reviewed through internal audit.
- Findings and actions are reported through Risk and Assurance governance arrangements.

Records

Records

Records will include:

- Training and competence records
- Brilliant Conversation performance reviews and 'check in' or supervision notes
- Disciplinary and conduct investigation records
- Contractor assurance and compliance records

- Records will be retained in line with **data protection and records management requirements**.

Version Control

- The version control log should be updated as and when the policy is amended using the structure below.

Version history			
Version	Amendment details	Date	Revised by
0.1	Draft for Comment SLT /Executive Team	24 April 2026	Susan Fulton Sam England Sonya Mullen
0.1	Draft for comment People Committee Customer Committee	12 May 19 May	Susan Fulton Sam England Sonya Mullen
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