

DEPARTMENT:	PEOPLE EXCELLENCE
DATE APPROVED BY BOARD:	29.07.2026
DATE OF NEXT REVIEW:	July 2029
CONSULTATION POST OT & LT REVIEW	CUSTOMERS
SQUARED IMPACT ASSESSMENT COMPLETED	YES

1. Purpose and context

This policy sets out how Squared will establish, implement, and embed a Competence and Conduct Framework to ensure that all Board members, Managers, Team members, and Contractors are competent, act with integrity, and deliver services that meet the expectations of the Regulator of Social Housing (RSH).

The approach recognises that Squared is at an early stage of implementation, and therefore focuses on:

- Establishing core frameworks, policies, and governance arrangements
- Understanding current levels of competence and identifying gaps
- Delivering a structured and proportionate phased implementation programme
- Building sustainable long-term capability and culture

This policy is aligned to:

- The Consumer Standards (Safety & Quality, Transparency, Tenancy, Neighbourhood & Community)
- The Governance & Financial Viability Standard
- The Social Housing (Regulation) Act 2023
- The Competence and Conduct Standard

2. Scope of this policy

This policy applies to:

- Board members
- All team members (permanent, temporary, agency)
- Contractors and key service providers

3. Alignment with strategic objectives

Squared will deliver the following objectives through a phased and proportionate approach:

- **Establish a baseline of competence**
To undertake a structured assessment of the current skills, knowledge and behaviours of all 'in-scope' roles.
- **Reinforce a culture of integrity & accountability**
To reinforce our values and expected standards of behaviour through effective leadership, policy, and performance management.
- **Achieve and evidence regulatory compliance**
To meet the requirements of the Competence and Conduct Standard within the required timescales, supported by robust documentation and Board assurance.
- **Build sustainable capability over time**
To deliver a phased programme of development, including qualifications, training, and leadership capability.
- **Strengthen customer trust and confidence**
To ensure that services are delivered by competent and professional staff, with customers treated fairly, respectfully, and consistently.

4. Reference to legislation

- The Consumer Standards (Safety & Quality, Transparency, Tenancy, Neighbourhood & Community)
- The Governance & Financial Viability Standard
- The Social Housing (Regulation) Act 2023
- The Competence and Conduct Standard

5. Implementation position and approach

Squared is currently at the mobilisation and early implementation stage of delivering the Competence and Conduct Standard.

The implementation approach is structured in two key stages:

Stage 1: Compliance (to deliver by the regulatory milestone of October 2026)

- Establish competence and conduct frameworks
- Undertake baseline assessments
- Identify skills and qualification gaps
- Implement initial training and development
- Provide Board-level assurance and evidence

Stage 2: Capability maturity

- Deliver phased qualification and development pathways
- Embed competence within recruitment, performance, and succession planning
- Strengthen leadership capability
- Establish sustainable learning and development systems

This approach ensures that Squared can demonstrate:

- Regulatory compliance in a timely manner
- A credible and deliverable plan for longer-term capability
- Proportionate investment aligned to organisational capacity

6. Competence framework

Core competencies (all roles)

Squared will establish a core set of competencies applicable across all roles, including:

- Understanding of the social housing regulatory framework
- Safeguarding awareness
- Equality, Diversity & Inclusion (EDI) – Fairness at Squared
- Customer service and engagement (the Squared Customer experience)
- Health & Safety awareness

These competencies will be refined and confirmed during the implementation phase.

Role-specific competencies

Role-specific expectations will be defined and aligned to organisational responsibilities. These will be fully developed and validated following the baseline assessment phase.

7. Recruitment and onboarding

Squared will progressively align recruitment and onboarding processes to the competence framework.

This will include:

- Competence-based recruitment aligned to defined role profiles
- Values-based interviewing (integrity, accountability, customer focus)
- Appropriate pre-employment checks (including DBS where required)
- Structured induction programme, which includes (but is not limited to):
- Regulatory standards
- Code of Conduct (Navigator & Management Competencies)
- Safeguarding
- Customer engagement

Full alignment will be completed during the implementation phase.

8. Learning and development

Mandatory training

We will ensure that Squared's mandatory training programme includes the following subjects, and is prioritised based on risk and role criticality:

- Safeguarding
- Health & Safety
- Equality & Diversity
- Complaints handling
- Data protection (GDPR)

Initial delivery will focus on high-risk and safety-critical roles, with full rollout completed over time.

Specialist training

Specialist training will be introduced where required, including:

- Building safety compliance
- Governance and regulation (Board Members)
- Leadership and management development.

Continuous Professional Development (CPD)

Squared will introduce a structured CPD approach:

- Annual training plans aligned to Quarterly Review outcomes
- Access to relevant external qualifications
- Proportionate CPD expectations based on role.

This will be implemented progressively following baseline assessments.

9. Conduct and behaviour standards

Code of Conduct

Squared will ensure the organisation's Values and Behaviour Framework "*The Navigator*" and "*Management Competencies Booklet*" align with the Regulator's requirements to embed a Code of Conduct which requires all individuals to:

- Act with honesty and integrity
- Treat customers with respect and fairness
- Avoid conflicts of interest
- Maintain confidentiality
- Report concerns and wrongdoing.

The Code (Navigator & Management Competencies) will be reviewed and embedded as part of the implementation phase.

Expected behaviours

Expected behaviours, as outlined in The Navigator and Management Competencies, will include:

- A customer-first approach
- Professionalism and accountability
- Openness and transparency
- Respect for diversity and inclusion.

These behaviours will be reinforced through leadership, training, and performance management.

10. Performance management

Performance management arrangements will be progressively aligned to the competence framework.

This will include:

- Introduction of competence-based objectives
- Alignment of Quarterly Review processes to defined competencies
- Capability procedures where performance falls below expectations.

Full integration into business-as-usual processes will take place during implementation.

11. Assurance and monitoring

During the early implementation phase, assurance will focus on demonstrating control, visibility, and progress.

Internal assurance

- Baseline competence and skills assessments
- Training completion monitoring
- Implementation dashboards (reported to Board)
- Progress tracking against implementation milestones.

External assurance

- Tenant Satisfaction Measures (TSMs)
- Board of Management oversight
- Independent governance reviews (periodic), where required.