

Dear Department for Levelling Up, Housing & Communities

Thank you for the opportunity to respond to this consultation. Please see below our response on behalf of Wandsworth Council. As a stock holding Local Authority with over 35,000 tenanted and leasehold stock, we look forward to the outcome of the consultation.

We agree with the fundamental principles of raising the quality of staff and that greater professionalism will lead to favourable outcomes where we listen to their residents and treat them with courtesy and respect. Our concerns relate to the impact on resources and staff retention and the effectiveness on ensuring that these principles are effectively cascaded to staff and operatives who deliver the day to day and face to face interactions with our residents and our housing stock.

There is potentially a significant impact on our staff and the services they provide, where they will be required to dedicate the appropriate amount of time to gain the mandatory qualifications. If professionalisation is to be implemented, there are numerous risks to the organisation, including:

- staff leaving/turnover (including those deciding to retire early)
- difficulties with recruitment and retention
- additional cost (staff being paid but not directly providing a service)
- resistant/unhappy staff
- time away from the workplace / impacting service delivery
- impact on continuity of service
- pressure on other colleagues covering time out of the office
- additional resourcing cost (for example, if agency staff are used)

We take the view that this is a significant additional resource requirement but without new burdens funding allocated. If this remains, then already constrained resources must have to be internally redirected from other priority activities.

For any queries or follow up questions, please get in touch with Wandsworth's Housing and Regeneration department through [michael.liu@richmondandwandsworth.gov.uk](mailto:michael.liu@richmondandwandsworth.gov.uk)

Regards,

Wandsworth Council

**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.

We agree with the general scope of the Competence and Conduct Standard, the behaviours and skills that are expected and the principle that standards for front line staff and across the organisation will be driven from senior managers. All organisations are expected to have comprehensive training and appraisal programmes which may have the potential to overlap and duplicate elements of the Standard and elements of the course content in the required qualifications. Therefore, we would welcome guidance and allowances for where skills, knowledge and behaviours already exist and can be evidenced. This also includes acknowledging the value of experience and other training not identified in mandated academic or accredited qualifications.

**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?**

No.

The consultation is focussed on managers and senior managers who are steps removed from daily and face-to-face interactions with tenants. On-the-ground operatives should not be included in the qualification criteria but the standards and behaviours that are expected should be to the equivalent of managers who 'play a substantive role in managing the delivery of housing management services'.

At a manager level, there is an expectation that a robust level of competency has already been met. There is a strong case that standards could be improved by providing an agreed standard of accredited training at more levels of service delivery.

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

Yes.

**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.

We agree that there should be a degree of competency in achieving the aims of the regulatory standards but do not feel this needs to be formal CIH certifications. For example, other sectors use a model of external assessment and audit – where the organisation can evidence their training and appraisal regime and can demonstrate that their relevant staff possess the required behaviours and standards.

In addition, as a Local Authority, some services, such as Complaints Management, Finance and Income Collection and Chief Executive are shared across the wider organisation. Complaints Team managers in local authorities may be responsible for housing-related complaints as only part of their portfolio but there may be a high expectation to complete qualifications.

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

No.

As outlined in this consultation response, formal accreditation may not be the most appropriate solution for all individuals, however, from conversations with comparable organisations as well as

central feedback, it remains clear that definitions of who should or should not be in scope is still required. For example, managers who manage an outsourced estate services contract or repairs and maintenance contract.

Senior Housing Managers could also include senior officers responsible for compliance, policy, strategy, planning and development, building safety leads, audit and project management/business process design. These positions all play key roles in ensuring that services to residents and the quality of homes they live in align with the objectives of the Regulator. In addition, there may be instances where officers with technical accreditation – such as those relating to building standards – do not necessarily have a background of working with tenants in the social housing sector.

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

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.

But potentially, back-office roles such as income collection require a level of understanding of their customer base and profile and the context in which they are working within.

We also understand that across the sector, there are varying interpretations of who would be in scope and would benefit on greater clarity, especially on definitions and exclusions.

**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.

**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?**

No.

This is unrealistic: it could mean that unqualified staff who have completed a probationary period have three months to commence a suitable qualification.

**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

**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?**

No

**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?**

No.

If a senior housing manager or executive has already been able to demonstrate that they have the necessary skillset and vocational experience to fulfil the role, and that an organisation has appropriate appraisals and performance monitoring the qualification is arguably unnecessary.

The resource implications to organisations in both time and finances will place additional pressures on housing department budgets at a time when resources are focussed on improving services, quality of homes and the requirements regarding the Building Safety Act. Training budgets are centralised so if qualifications are ringfenced (and outside of the apprenticeships programme) then the development of non-managers and staff wishing to progress through the organisation will be impacted as a result.

***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?***

No.

The resource impact outlined in our response to Question 12 is also applicable here.

***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.

Whilst fundamentally we disagree with the need for accreditation of senior personnel using a narrow and prescribed qualification criterion, we agree with the premise that qualifications can be regulated by Ofqual or predecessor body, if the central proposal is to proceed. However, it is noted that the proposals are not clear or consistent as to if there is a time limit on when qualifications were achieved or does not state where refresher training is required or where persons hold equivalent qualifications from overseas.

***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.

We agree with the course content but would note that there will be areas of overlap where the skills and knowledge listed would already be established and assessed through existing training and development strategies, pre-existing qualifications, role specification and recruitment criteria and through long-term experience. Where a sufficient level of knowledge and skills can be assessed and evidenced, this should be considered in place of meeting the qualification criteria.

***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.

***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?***

No.

It should be left to councils to decide how long those in-scope are required to complete any necessary training. In addition, points 68 and 71 of the proposals provide conflicting information regarding the appropriate time limit for completing qualification.

**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.

**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?**

No.

The consultation does not fully consider the impact of completing the pre-requisite courses which may be required. For example, CIH Levels 3 and 4 are pre-requisites for Levels 4 and 5 respectively. Further clarification would also need to be provided on what counts as relevant experience of working in the sector (for example, as stipulated on the CIH website). If pre-requisites are required, they should be added to the potential transition period. Therefore, an assessment on 'working towards' a specific qualification should also include such circumstances, the time taken and the resource impact. In regard to qualifications, we are aware that this may potentially negatively impact staff without previous academic qualifications, from non-academic backgrounds or who are not best suited to a study and examination model.

**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.

We have identified a high volume of staff in scope who would require the relevant accreditation. This will require a considerable additional resource to be found if not met through new burdens funding and will impact on spending elsewhere in the organisation, particularly training budgets. Housing provider resources are continuously under pressure, and training staff, especially where training is duplicated, competes with existing priorities (such as improving the quality of homes and ensuring they are free of damp and mould), fire and building safety improvements and keeping rents low.

There are significant risks and challenges that may arise. We are concerned that this could lead to higher staff turnover in the short to medium term particularly if staff choose or are required to leave their roles due to not having the necessary accreditation. We would also require greater clarity on where staff members leave part way through their studies or fail the course and how this cost is recouped and clarity on the adjustments and support available for staff with neurodiverse profiles or disabilities.

The proposals do not account for where staff members decline to study for the necessary qualifications or are unable to do so. If they are expected to leave the organisation under the new regime, whether this would be a disciplinary or grievance process and if this is compatible with employment and contract law.

The time commitment required - 7-8 hours per week - could have a detrimental impact on service delivery. Senior managers and executives will either be absent, so to complete the requisite amount of weekly learning, or at an increased risk of burnout if this is completed in addition to an already busy workload. Any absences will need to be covered and this could be costly particularly if agency staff are used. Service disruption could adversely impact the very people who are intended to benefit from the drive to improve standards.

From a learner perspective, the proposals put an additional strain of their well-being and work-related stress. This could potentially manifest in a rise in case work stemming from poor

performance, grievance, disciplinary and sickness absence – where people not wanting to or refusing to undertake a qualification or where staff are required to take on additional workloads.

There are also very obvious challenges to implementation. For example, the proposals do not take account of what happens should anyone seek to change their career and work toward a different qualification (funded or unfunded) during employment in their current role. Our goal is to attract and retain talent, and this could be negatively impacted, which may lead to poorer customer outcomes. Should an employee choose to leave the organisation whilst undertaking their qualification does the qualification follow the employee to their new employer, who then stands to benefit in the longer term? In addition to the administrative resources spent on recruitment and training, it would be virtually impossible to recover these fees from the individual.

We would encourage the consultation to consider and take into account transferable skills, knowledge and behaviours as a substitute for mandatory qualifications, High-performing staff with considerable experience would feel under-recognised where a condition of their continued employment was to undertake mandatory qualifications.

***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.

However, concerns raised about the willingness and availability of qualified staff to undertake additional modules in our response to Question 20 apply here.

***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.

Housing apprenticeship schemes are expected to meet all relevant course content requirements. However, concerns raised about the willingness and availability of qualified staff to undertake additional modules in our response to Question 20 apply here where the apprenticeship is not housing specific. This may also impact on high-quality candidates considering housing as a development route.

***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?***

Don't know.

The uprate in staffing costs due to fewer qualified staff and higher qualification requirements is not addressed, e.g. higher salaries, increased turnover, and smaller pool. This will also impact operational continuity.

In the longer term, this could be challenging as there is likely to be fewer readily qualified and available staff which could potentially make recruitment more costly. We also think that councils should always be able to recruit the best possible candidates to provide the best possible service to residents, rather than simply meet set criteria.

**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.**

31

**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?**

31

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

26

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

5

**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.**

20 staff, 62%

**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?**

Unknown

**Question 40: Please specify whether you pay the apprenticeship levy**

Yes

**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?**

Unknown