



Places to live. Space to grow.

Professionalism Policy

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1 Introduction: the purpose of this policy

1.1 West Kent is committed to delivering safe, high-quality, respectful and effective services to residents and communities. Professionalism, competence and good conduct are essential to building trust with residents, protecting people from harm, and meeting our legal and regulatory responsibilities as a social housing provider.

1.2 In this policy, the following terms apply:

- **In-Scope Role** means a role identified through West Kent's role mapping exercise as requiring a Mandatory Qualification;
- **Mandatory Qualification** means a CIH Level 4 or Level 5 qualification, or an equivalent qualification recognised by the Regulator, required for an In-Scope Role;
- the **Regulator** means the Regulator of Social Housing;
- **Employees** means all staff, agency workers and individuals working on West Kent's behalf, regardless of role, seniority or employment status;
- **Service providers** are organisations delivering housing management services on West Kent's behalf, as defined in the Government's Policy Statement on Qualification Requirements for Social Housing.
- the **Standard** means the Regulator's Competence and Conduct Standard, as set out in the Direction on the Regulatory Standards (Competence and Conduct) 2025; and
- **Transition Period** means the period ending 1 October 2029.

1.3 This policy sets out West Kent's approach to ensuring high standards of professionalism, competence and conduct across the organisation, in line with the Regulator of Social Housing's Competence and Conduct Standard. This policy does not form part of any employee's contract of employment and West Kent reserves the right to amend it at any time.

1.1 This policy applies to:

- West Kent Employees
- External service providers delivering housing management services on West Kent's behalf, where applicable

1.4 The purpose of this policy is to:

- set clear, consistent expectations for professional behaviour, competence and conduct;
- confirm our approach to Mandatory Qualifications;
- support resident safety, dignity and positive experiences;

- ensure compliance with current and future regulatory requirements;
- promote a learning-focused, supportive and accountable organisational culture;
- clarify roles and responsibilities for employees, managers and service providers; and
- provide assurance to residents, employees, the Board and the Regulator.

1.5 This policy should be read alongside the related policies listed at the end of this document. It does not replace those policies but provides overarching principles for professionalism at West Kent.

2 Policy statement

2.1 To support our vision of creating places to live and space to grow, West Kent is committed to high standards of professionalism, competence and conduct in the services we provide. This policy sets out what we expect from employees and service providers working on our behalf and ensures we meet the Regulator's Standard.

3 Professional conduct

3.1 Professionalism at West Kent is informed by the National Housing Federation Code of Conduct (2026), which states that 'respectful, fair and empathetic behaviour is essential to building trust, maintaining effective relationships and supporting a healthy organisational culture'. At West Kent, this means acting with honesty, integrity and accountability, treating residents, colleagues, partners and contractors with dignity, respect and fairness, and taking responsibility for the impact of our actions, decisions and behaviour.

3.2 All employees must:

- act in line with West Kent's values, Code of Conduct and Customer Service Standards;
- behave with honesty, integrity and accountability;
- treat residents, employees, partners and contractors with dignity, respect and fairness;
- maintain clear and appropriate professional boundaries;
- recognise and respond appropriately to safeguarding concerns;
- understand and act accordingly to the individual resident's circumstances and vulnerabilities;
- use clear, respectful and inclusive language;
- listen actively and take residents' views seriously;
- respect confidentiality and comply with data protection requirements;
- act only within the limits of their role, authority and competence; and
- take responsibility for their actions, decisions and behaviour.

3.3 West Kent's Code of Conduct provides full details of expected standards and behaviours.

4 Competence and capability

4.1 West Kent will ensure that all employees involved in delivering housing services have the skills, knowledge, experience and behaviours needed to carry out their roles effectively and safely. Competence will be assessed by considering:

- appropriate knowledge and technical skills;
- understanding of relevant legislation, regulation and policy;
- the ability to apply learning in practice; and
- behaviours aligned with our values.

Competence is supported through:

- safe recruitment and role design;
- induction and probation;
- required learning and refresher training;
- Mandatory Qualifications and certifications;
- performance management including regular 1 to 1s and performance development reviews (PDRs).

4.2 Concerns about employees' conduct or capability will be managed through the appropriate HR policy, with advice from the People and Organisational Development Team.

5 Mandatory Qualifications

5.1 Mandatory Qualifications apply only to employees in In-Scope Roles. In-Scope Roles currently include 'Senior Housing Managers' and 'Senior Housing Executives', as defined in the Government's Policy Statement on Qualification Requirements for Social Housing.

5.2 West Kent's approach to role mapping:

- Roles are identified through a mapping exercise using West Kent's assessment tool and reviewed periodically.
- New or adjusted roles will be assessed to determine whether they are In-Scope Roles.
- Assessments will normally be conducted at Head of Service level, with support from the People and Organisational Development Team.
- Employees moving into an In-Scope Role must either hold a Mandatory Qualification or be working towards one, in line with the Government's definition of 'working towards'.

5.3 Where an employee believes that their role has been incorrectly mapped, they may request a review via their Head of Service. The review will:

- consider the nature, extent and accountability of the role's responsibilities and time spent on housing management services;

- take account of employee representations, job description and service delivery arrangements;
- normally be conducted at Head of Service level, with support from the People and Organisational Development Team; and
- be completed within a reasonable timeframe with the outcome communicated to the individual.

Funding and payback

- 5.4 West Kent will fund Mandatory Qualifications. No payback will apply where an employee fails to complete, or is unable to complete, a Mandatory Qualification. However, where an employee voluntarily withdraws from a qualification programme part-way through without good reason, West Kent reserves the right, at its discretion, to require repayment of the full course fees within six months of the date of withdrawal. Any decision to seek repayment will be made by the relevant Head of Service (or Executive Director if in relation to a Head of Service) and the Head of People and Organisational Development, having regard to the individual circumstances.

Study leave

- 5.5 Employees undertaking a Mandatory Qualification will normally receive one additional day of study leave per module (pro rata for part-time employees), in addition to the five days available under the Learning & Development Policy. Study leave may be used flexibly for taught sessions, independent study, revision or assessment preparation.
- 5.6 Additional study time may be agreed where justified by the structure of the qualification or individual circumstances. Managers will work with employees to plan study time and manage workloads accordingly. Reasonable adjustments will be made for disability, health conditions, neurodiversity or caring responsibilities.
- 5.7 All study leave must be agreed in advance with the relevant line manager and booked via MyHR. Study leave should be taken in support of current learning activity and cannot be accrued or carried forward for use at a later date. Study leave does not apply to those completing a Mandatory Qualification via the apprenticeship route, for whom 20% off-the-job learning time applies by statute.

Re-sits and failed assessments

- 5.8 Where employees do not pass a required element at the first attempt, West Kent will:
- meet with the individual to discuss the outcome, agree a plan for re-sitting the relevant assessment, and identify any additional support;
 - fund one further attempt at the relevant assessment; and
 - treat time off for re-sits as study leave under section 5.5.
- 5.9 The individual is expected to demonstrate reasonable effort and engagement with any agreed support plan. Failure to do so may be taken into account in any subsequent formal process under section 5.12.

- 5.10 Where employees have exhausted the permitted number of re-sit attempts without passing, or refuse to engage with the re-sit process, section 5.12 will apply.

Managing non-completion

- 5.11 Where completion of a Mandatory Qualification causes difficulty, the line manager, supported by the People and Organisational Development Team, will work with the individual to understand the barriers and explore appropriate adjustments. A record of all such discussions should be kept.
- 5.12 Where completion is not possible, despite support, West Kent may instigate a formal process under the Capability Policy or, where appropriate, the Disciplinary Policy. Any formal meeting will be initiated by a written invitation setting out:
- West Kent's concerns;
 - the potential outcome, including the possibility of termination of employment;
 - the right to be accompanied by a trade union representative or a workplace colleague; and
 - any reasonable alternatives to termination that have been considered, including redeployment to a role that is not an In-Scope Role.
- 5.13 Refusal to engage with a Mandatory Qualification without reasonable cause may be managed under the Disciplinary Policy.

Employees planning to retire before the end of the Transition Period

- 5.14 Where an individual has confirmed plans to retire before the end of the Transition Period, West Kent will take a pragmatic and proportionate approach. Any treatment under this section will be based solely on the individual's confirmed and documented intention to retire, and not on age or any protected characteristic. The individual will be asked to confirm their intention to retire in writing, with a proposed retirement date. All outcomes will be documented by the People and Organisational Development Team and applied consistently to all employees meeting the same criteria.
- 5.15 Six months before the end of the Transition Period, West Kent will review those who have previously expressed an intention to retire, to confirm their plans and ensure ongoing compliance with the Standard.

6 Learning and Continuous Professional Development (CPD)

- 6.1 West Kent is committed to a positive learning culture. Ongoing learning and development are central to delivering safe, high-quality services and maintaining compliance with the Standard. Learning is one of West Kent's values and is viewed as both an individual and shared responsibility. Further detail is set out in the Learning & Development Policy.
- 6.2 West Kent will:
- provide required learning aligned to regulatory, legal and organisational priorities;

- ensure learning content reflects residents' needs, including safeguarding, vulnerability and equality;
- provide access to a range of learning methods, including training, digital learning, coaching, mentoring and on-the-job development;
- use the Learning Management System (LMS) to track completion and provide assurance;
- review learning requirements regularly in response to regulatory change and service needs; and
- promote reflective practice, knowledge sharing and continuous improvement.

Continuous Professional Development (CPD)

- 6.3 CPD supports employees to maintain and develop professional competence throughout their career. CPD may include professional qualifications, professional membership, refresher training, coaching, mentoring, peer learning, job shadowing, secondments and reflective practice.
- 6.4 Where a role requires a professional qualification and ongoing CPD to maintain professional registration, West Kent will support employees to meet these requirements. West Kent will not unreasonably withhold agreement to employees taking CPD time required to maintain an existing professional registration. Such time is separate from, and in addition to, the study leave provisions in section 5.5.
- 6.5 Employees are responsible for recording their CPD activity, via the LMS, 1 to 1s and the PDR process. CPD expectations will be proportionate to role, responsibility and risk.

Professional memberships

- 6.6 Employees may claim one annual subscription to a professional body if it is on HMRC's approved list and relevant to their role. Full details are in the Remuneration and Expenses Policies.
- 6.7 Employees in In-Scope Roles may additionally claim the cost of a Chartered Institute of Housing (CIH) membership, to support engagement with CIH professional standards and learning resources during their studies.

7 Recruitment and onboarding

- 7.1 West Kent will ensure that professionalism and competence are embedded from the start of the employment lifecycle. West Kent will:
- design roles with clear responsibilities, decision-making authority and accountability;
 - assess whether roles involve a substantive responsibility for housing management services and may therefore be In-Scope Roles;
 - set out required knowledge, skills, behaviours and qualifications clearly in job descriptions;
 - ensure recruitment and selection processes align with the requirements set out in job descriptions;

- review job descriptions where services, structures or regulatory expectations change; and
- where a role requires a specific professional qualification as a condition of employment (other than a Mandatory Qualification), state this in the job description and verify that the requirement is met at the point of appointment.

7.2 Where a role is an In-Scope Role, this will be made clear at the recruitment stage. Candidates appointed into an In-Scope Role must either hold a Mandatory Qualification or commit to working towards one in line with the Government's policy statement.

7.3 Where an In-Scope postholder needs to work towards a Mandatory Qualification, West Kent will support enrolment and progress, including where there are course start delays or periods of extended absence.

8 Performance Development Reviews (PDRs)

8.1 All employees will take part in West Kent's PDR process. PDRs will be used to confirm understanding of expected standards, reflect on performance and conduct, identify learning and qualification needs, and agree objectives and actions.

8.2 Agreed PDR actions will be followed up through regular 1 to 1s. Where performance or conduct falls short of expectations, West Kent will take timely and appropriate action, starting with supportive measures such as feedback, coaching, and agreed improvement plans, and escalating to formal processes under the Capability or Disciplinary Policy where necessary.

9 Responsibilities

Executive Team and Operational Management Team

9.1 The Executive Team (ET) is accountable for providing assurance to the Board and the Regulator that West Kent meets the requirements of the Standard and that professionalism, competence and good conduct are embedded across the organisation.

9.2 The Executive Team and Heads of Service must:

- lead by example and demonstrate West Kent's values and professional standards;
- ensure effective governance, policies and frameworks are in place to meet the Standard;
- oversee role mapping and periodic review of In-Scope Roles;
- ensure sufficient resources and support are available for required learning and Mandatory Qualifications;
- hold managers to account for embedding professional standards and addressing concerns promptly;
- monitor compliance with required learning, Mandatory Qualifications and professional standards;
- review assurance information, including audits, complaints, feedback, and regulatory engagement, and act on learning; and
- promote a culture of openness, learning and psychological safety.

Manager responsibilities

9.3 Managers play a critical role in embedding professionalism, competence and good conduct. They must:

- act as role models and clearly communicate expectations around conduct, competence and professional standards;
- provide regular supervision, 1 to 1s and PDRs focused on competence, conduct and wellbeing;
- monitor completion of required learning, refresher training and Mandatory Qualifications;
- support employees to identify learning, development and CPD needs and agree realistic development plans;
- manage workloads so employees can complete learning and qualifications safely and effectively;
- take prompt, fair and proportionate action where concerns about conduct, competence or capability arise; and
- create and maintain a culture where employees feel safe to speak up, ask questions and raise concerns.

Employee responsibilities

9.4 All employees must:

- act professionally, ethically and respectfully at all times;
- treat residents, colleagues and partners with dignity, fairness and respect;
- complete required learning, refresher training and Mandatory Qualifications where applicable;
- maintain and develop their own knowledge, skills and behaviours and record their CPD;
- follow West Kent's policies and procedures, including those relating to safeguarding, health and safety, data protection and professional boundaries;
- raise concerns promptly where conduct, competence, safety or standards may be compromised;
- work within the limits of their role, authority and competence; and
- engage constructively with supervision, feedback and development discussions.

10 Service providers

10.1 West Kent expects all external service providers who deliver housing management services to demonstrate the same standards of professionalism, competence and conduct as West Kent's own employees. Service providers must comply with relevant West Kent policies and procurement framework.

10.2 For the purposes of this policy, West Kent will determine whether an organisation is a service provider by applying the definition set out in the Government's Policy Statement on Qualification Requirements for Social Housing.

10.3 Service providers must:

- act lawfully, ethically and professionally at all times;
- treat West Kent employees and residents with dignity, respect and fairness;
- maintain appropriate professional boundaries;
- work within the limits of their role, authority and competence;
- recognise and respond appropriately to safeguarding and modern slavery concerns; and
- comply with all relevant West Kent policies, standards and contractual requirements.

10.4 Service providers must ensure that their employees delivering services on West Kent's behalf are suitably qualified, trained, experienced and supervised, and that mandatory training, including safeguarding, health and safety, data protection and equality, is kept up to date.

10.5 West Kent will hold service providers to account through procurement due diligence, ongoing contract management and performance monitoring, audits, and resident feedback. Compliance with West Kent's Contractor Code of Conduct is a contractual requirement. Where concerns arise and cannot be resolved, West Kent will take appropriate action, which may include improvement plans, additional assurance requirements or contract termination in accordance with the procurement framework and the Contractor Code of Conduct.

11 Raising concerns

11.1 West Kent is committed to a culture where concerns about professionalism, competence, conduct or safety can be raised openly and addressed promptly and fairly. Concerns may include unprofessional or inappropriate behaviour, unsafe practice, safeguarding or vulnerability concerns, or breaches of policy or professional boundaries.

11.2 Concerns can be raised through:

- line management;
- the People and Organisational Development Team;
- safeguarding routes;
- the Whistleblowing Policy; or
- resident complaints via our Complaints Policy and Procedure.

11.3 All concerns will be taken seriously, handled sensitively and, where appropriate, confidentially in line with relevant policy.

12 Regulation

12.1 The following are relevant to this policy:

- Direction on the Regulatory Standards (Competence and Conduct) 2025
- The Government's Policy Statement on Qualification Requirements for Social Housing

- Social Housing (Regulation) Act 2023
- Consumer Standards
- Equality Act 2010.

13 Compliance reporting

- 13.1 The Executive Team will receive quarterly compliance reports. The People & Appointments Committee will receive half-year and annual reports. The Governance Team produces an annual report to the Regulator on compliance with the Consumer Standard, which will include competence and conduct once the Standard is live.

14 Consultation and communication

- 14.1 West Kent has engaged with residents in developing this policy through a resident-wide survey (March-April 2026) and a focus group (April 2026). The draft was subsequently reviewed by the Scrutiny Panel.
- 14.2 The policy has also been reviewed by the Staff Consultative Committee, Heads of Service, the People and Organisational Development Team, an external employment law specialist, the Executive Team and the People and Appointments Committee.
- 14.3 This policy will be available on West Kent's intranet for all employees and on the West Kent website for residents and the wider public.