



South Tyneside Council

South Tyneside Council (STC) Housing Professionals Development Policy

This document has been classified as: **Not
protectively marked**

**Amy Norton, Organisational Development Advisor –
0191 424 6136
People & Organisational Development Committee –
27 May 2026**

Report to People and Organisational Development Committee

Cabinet Portfolio/Lead Member: Cllr Susan Sybenga

Report of Amy Norton, Organisational Development Advisor

Subject: South Tyneside Council (STC) Housing Professionals Development Policy

Date: 27 May 2026

Wards affected: N/A

Council ambitions: Fit for Purpose Council

Does the report and any appendices contain information which has been identified as confidential or exempt?

- No, this report does not contain information identified as confidential or exempt.

For Executive Decisions only:

Is the decision a Key Decision? No

Is it included in the Forward Plan? No

If not in the Forward Plan is the report: General Exception Rule / Special Urgency Rule - No

Relevant Scrutiny Chair: N/A

Is the decision eligible for call-in by Scrutiny? No

(If the decision is anything other than any executive decision made by the Cabinet or a Key Decision made by an officer under delegated powers, call-in is not applicable. This should be explained in the report).

Purpose of Report

1. This report outlines the introduction of the South Tyneside Council (STC) Housing Professionals Development Policy.

Background Information

2. The Housing Professionals Development Policy establishes a clear local framework to support colleagues in housing leadership roles to meet the requirements of the Competence and Conduct Standard, which will come into force in October 2026.
3. This standard is being introduced by the Regulator of Social Housing, following a direction from Government, and is underpinned by the Social Housing (Regulation) Act 2023, which enables the regulator to set requirements in relation to the competence, qualifications, and conduct of individuals delivering social housing services.
4. The standard specifically requires senior housing leaders who spend a significant proportion of their time (50% or more) managing housing services to hold, or be working towards, an appropriate Ofqual-regulated qualification.
5. Appropriate qualification is defined as Level 4 Ofqual-regulated housing management qualification (aimed at Senior Housing Managers or Leads) and Level 5 or Foundation Degree Ofqual-regulated qualification in housing management (aimed at Senior Housing Executives).
6. The policy translates these national requirements into a consistent local approach by defining roles in scope, setting out qualification expectations, and clarifying responsibilities for employees and managers. It also establishes a mechanism for determining scope where roles are not immediately clear.
7. In addition to setting expectations, the policy focuses on enabling successful completion through structured support, including access to learning and development, study time, and reasonable adjustments. It also sets out how the Council will manage key implementation issues such as exemptions, acting up arrangements, funding and repayment, and instances of non-completion.
8. The policy reinforces the importance of ongoing professional development, ensuring that competence is maintained beyond initial qualification and can be evidenced through performance management and assurance processes.
9. Overall, it supports the Council's commitment to maintaining a skilled, professional workforce and delivering high quality housing services.

Aims of the Policy

10. The policy provides a clear and practical framework to:
 - Support in scope colleagues to achieve required qualifications

- Enable effective learning and development planning
 - Ensure consistent application across services
 - Provide clarity on support, responsibilities and processes
11. It has been developed collaboratively by the People and Organisational Change Service and Housing Services, informed by national requirements, sector best practice, and refined through stakeholder engagement to ensure that it is robust, deliverable and aligned with the Council's responsibilities as a social landlord and employer.

Progress to date

12. A comprehensive draft policy has been developed and reviewed with relevant stakeholders including tenants via a 'Check and Challenge' meeting. It:
- Defines in-scope roles and qualification requirements
 - Sets out support arrangements and responsibilities
 - Addresses key implementation scenarios, including exemptions, funding and non-completion
 - Embeds expectations for continuing professional development
13. Initial delivery has commenced, with the first cohort of Level 4 apprentices in place, demonstrating early progress ahead of the 2026 compliance deadline.
14. The policy is now positioned to support a consistent and proactive approach to meeting the new regulatory requirements.

Next Steps

15. Finalise the Housing Professionals Development Policy through appropriate governance and consultation processes, ensuring it is robust, ready for implementation ahead of the Competence and Conduct Standard (October 2026), and effectively communicated so all relevant staff are aware of the requirements.
16. Identify employees in scope and establish a baseline of current qualifications, those in progress, and any cases requiring exemption or further review. Also ensure any new roles identify the requirements as part of the job description and person specification.

17. Develop implementation arrangements, including guidance, communications, and supporting materials to clarify responsibilities, support routes, and compliance timescales. This includes the Council's approach to exemptions, acting up arrangements, funding, and repayment provisions to ensure consistency. Work will be ongoing with managers to ensure appropriate learning and development pathways, including study time, workload planning, provider arrangements, and reasonable adjustments are in place.
18. Embed continuing professional development (CPD) requirements within annual reviews and check-in's and establish systems to record qualifications and CPD activity to support monitoring and regulatory compliance.
19. Continue engagement with managers and stakeholders to address practical issues and support needs and provide further updates and documentation as required to support compliance and workforce development.

Implications

20. The introduction of the Housing Professionals Development Policy has implications for employees in relevant housing leadership roles and their line managers as well as Housing Services and the People and Organisational Change service.
21. Workforce implications include the need for staff to achieve qualifications, supported by study time, workload planning, manager support, and clear arrangements for exemptions and non-completion. Additional resourcing will be required for implementation and compliance monitoring.
22. The Equality Impact Assessment (EqIA) undertaken on the 9th April 2026 highlights potential disproportionate impacts on certain groups, including those with disabilities, caring responsibilities, or socio-economic disadvantage.
23. Key risks relate to barriers in completing qualifications alongside operational demands, including accessibility, workload pressures, and personal circumstances.
24. Mitigations include protected learning time, reasonable adjustments, flexible approaches, study support, and ongoing monitoring to ensure fair and inclusive implementation.
25. Overall, the EqIA supports proceeding, given the regulatory requirement and the benefits in strengthening professional standards and service quality, with continued monitoring and mitigating actions in place to address emerging risks and issues.

Financial and Resources

26. There are financial and resource implications associated with implementation of the Housing Professionals Development Policy. These arise from the need to support employees in relevant roles to undertake and complete the required qualifications, including associated learning time, manager support, administration, and the coordination of qualification routes.
27. In many cases, qualification costs may be met through available apprenticeship funding routes. Where this is not possible, there may be a requirement for the Council to consider alternative funding arrangements for relevant qualifications, together with the application of any repayment provisions set out in the policy.
28. There are also staffing resource implications for Organisational Development, Human Resources and Housing Services. These include identifying employees in scope, confirming qualification routes, supporting managers and learners, maintaining records, monitoring progress, and ensuring compliance with the new requirements over time.
29. Managers will also need to plan for the operational impact of protected learning time, study requirements and any reasonable adjustments required to support completion. This may require workload reprioritisation and careful service planning to ensure business continuity while employees undertake learning.
30. Although these implications will need to be managed through implementation planning, the policy is intended to support compliance with external regulatory requirements and reduce the longer-term organisational risk associated with non-compliance, inconsistent practice, or insufficient evidence of workforce competence.

Legal and Governance

31. The recommendations in this report do not relate to a Key Decision and therefore prior notification on the Forward Plan is not necessary.
32. There are legal and governance implications associated with the Housing Professionals Development Policy, as it has been developed in response to the Competence and Conduct Standard and the Social Housing (Regulation) Act 2023.
33. The policy provides the Council with a local framework to support compliance with these external requirements and to ensure that qualification, competence and support arrangements are applied through appropriate governance, management and employment processes.

Risk

34. There is a risk that, without timely implementation of the Housing Professionals Development Policy, the Council may be less well prepared to demonstrate compliance with the Competence and Conduct Standard when it takes effect. This will be mitigated through completion of the policy, identification of in scope roles, implementation planning, and ongoing monitoring of qualification and competence requirements.
35. There is also a risk that employees in scope may experience additional pressure in balancing qualification requirements with operational responsibilities, which could affect wellbeing, progress or service delivery if not managed effectively. This will be mitigated through workload planning, protected learning time, reasonable adjustments, manager support, and the wider implementation measures set out in the policy and Equality Impact Assessment.

Equality and Diversity and Community

36. An Equality Impact Assessment has been completed for the Housing Professionals Development Policy. This concluded that, while the policy supports improved professional standards and service quality, there is potential for disproportionate negative impact for some groups if implementation is not managed carefully, particularly in relation to disability and neurodiversity, pregnancy and maternity, caring responsibilities, age, race, religion or belief, and socio-economic disadvantage.
37. The assessment identifies a range of mitigating actions, including protected learning time, workload planning, reasonable adjustments, flexible arrangements and ongoing monitoring, to support fair and consistent implementation.

Environmental and Sustainability

38. There are no significant environmental and sustainability implications arising from the proposed recommendations in this report.

Council Ambitions, Policies, Strategies and Plans

39. This report supports the achievement of the Council's ambitions, policies, strategies and plans.

Consultation and Engagement

40. Extensive consultation with Council officers, Neighbouring Authorities, Tenants and Trade Unions has been carried out as detailed in this report.

Recommendations

41. It is recommended that the People and Organisational Development Committee note the introduction and development of the STC Housing Professionals Development Policy and the progress being made to prepare for implementation of the Competence and Conduct Standard.

Reasons for Recommendations

42. To ensure the Committee is informed of the Council's approach to supporting compliance with new regulatory requirements, strengthening professional competence in housing leadership roles, and maintaining high-quality services for tenants.

List of Appendices

1. Housing Professionals Development Policy
2. Equality Impact Assessment for the Housing Professionals Development Policy

Background Papers

Section 100D of the Local Government Act 1972 gives the public right to inspect background papers for reports. Report Authors must set out at the end of the report a list of documents which have been relied upon in writing the report, or which contain facts or matters on which the report has been based.

This needs to include published works such as legislation and where possible provide weblinks to these documents. Where a weblink is not available, the document must be provided electronically to Democratic Services at the same time as the report to be published for inspection.

Reports containing confidential or exempt information as defined by the Local Government (Access to Information) Act 1985 and which will be considered in private do not need background papers to be referenced.

Background papers must be retained for a period of four years.

The following is a list of the background papers (excluding exempt papers) relied upon in the preparation of the above report:

Background Paper	File Ref:	File Location
Nil		



South Tyneside Council

Housing Professionals Development Policy

**South Tyneside Council
May 2026**

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1. Introduction

The Government has directed the Regulator of Social Housing to set up a new Competence and Conduct Standard (CCS), commencing October 2026. The new standards strengthen professional practice across social housing. This is achieved by enhancing the skills and knowledge of senior leaders who substantively manage delivery of housing management services. South Tyneside Council expects our housing executives and senior leaders to either hold or be working towards the Ofqual-regulated housing management qualifications.

2. Aims of Policy

South Tyneside Council is committed to ensuring colleagues in designated housing leadership roles have access to learning and development and achieve the qualifications required under the CCS and the Social Housing (Regulation) Act 2023.

This policy sets expectations for employees and managers, details of support routes, and outlines processes for exemptions, acting-up, funding, and non-completion to ensure compliance and high-quality services for tenants.

3. Scope

This policy will apply to Senior Housing Executives (e.g., Directors, Assistant Directors and Heads of Function) and Senior Housing Managers (e.g. Housing Leads such as; Empty Homes Construction Manager and Voids and Allocation manager, etc.), who spend 50% or more of their working time managing delivery of housing management services to social housing tenants. Examples of work areas that would be within scope include tenancy or housing management, repairs, income, asset or building safety, anti-social behaviour, or capital or major works but is not limited to these areas and other appropriate areas of work may also be considered.

Where a role is in scope, our Council requires the individual to complete a Relevant Qualification, unless:

- they have committed to commence within the first 12 months in post or
- they already hold a Relevant Qualification or
- they are working towards a Relevant Qualification or
- a valid exemption applies (Section 4).

Where a job description or person specification does not specifically document the requirement for a relevant qualification, Human Resource Advisors or Organisational Development Advisors can support in determining whether a role is in scope in

consultation with the manager or Senior Management Team (SMT). Information can be found by consulting the relevant Government guidance, Competence and Conduct Standard, and associated policy statements.

Roles focused on care and support, such as personal care in supported housing, are not in scope unless the role also substantively (50% or more of time) focuses on housing management.

This policy does not apply to employees appointed or employed by the governing body of a school to work in a school, where responsibility for learning and development lies with the governing body.

If you are unsure whether these requirements apply to your role, speak to your line manager or contact your Human Resources Advisor or Organisational Development Advisor.

4. Exemptions

The Council recognises that there may be circumstances where enrolment, attendance, or progress on the qualification is not possible due to statutory or health-related absence.

An employee may be exempt from completing a Relevant Qualification where:

- The employee has a confirmed end date for employment (e.g., retirement or fixed-term contract expiry, and completion prior to leaving is not feasible; or
- The employee is on a short-term secondment that will end before completion is feasible.
- The employee is currently long-term absent from work due to illness (but will be expected to enrol or complete the course upon return to work and/or when they are medically fit to do so). Occupational Health advice may be sought in this circumstance.
- The employee is due to go on or is on maternity or paternity leave (but will be expected to enrol or complete the course upon return to work).
- Participation during maternity leave will only occur where voluntarily agreed, for example through a Keeping in Touch (KIT) day, and will not be expected or required.
- Consideration will also be given to employees who are on other forms of statutory leave, including adoption leave, shared parental leave, or long-term caring leave.

Exemptions will be discussed between the employee and line manager, supported by Human Resource Advisor and/or OD Advisor and in consultation with Senior Management Team (SMT), agreed with the employee, and confirmed in

writing. Deferred completion will be formally recorded and managed to ensure compliance once the employee returns to work.

5. Our Council Values

Our Values are the things we most care about. In applying every policy and process, we must consider and uphold our [PROUD Values](#). These define what we stand for as an organisation, how we work and how we act.

- Professional – we uphold high standards.
- Respectful – we value people.
- Open and honest – we trust each other.
- Understanding and engaging – we care about people.
- Deliver what we say we will - we provide great services.

Under each Value is a set of guiding behaviours. These apply to every person who works for or represents South Tyneside Council. They are our promise to residents, each other and to all who interact with the Council.

6. Definitions

“**Government Standard**” or “CCS” refers to the national Competence and Conduct Standard, set by direction to the Regulator of Social Housing.

“**Relevant Qualification**” is defined as follows:

- Level 4 Ofqual-regulated housing management qualification (aimed at Senior Housing Managers or Leads).
- Level 5 or Foundation Degree Ofqual-regulated qualification in housing management (aimed at Senior Housing Executives).

“**Substantive role**” refers to roles where a significant amount of employee working time, usually 50% or more, is spent managing the delivery of housing management services.

7. Responsibilities

Employees (only applicable to those in scope)

- **Know your obligations:** Familiarise yourself with this policy and your role’s qualification requirements. Understand the implications for your employment where achievement of a qualification is required.

- **Undertake required learning:** Complete mandatory learning appropriate to your role and achieve the Relevant Qualification. Ensure that continuous professional development is undertaken as required for your role and maintain learning records.
- **Address role changes:** Complete any additional qualifications if your role changes, and the Government Standard requires it.
- **Evaluate and monitor learning:** Maintain CPD records to ensure regulatory compliance. Effectiveness of learning should be reviewed with your line manager during Check-ins and Annual Reviews conversations, and newly acquired skills and knowledge are expected to be applied in daily work activities.
- **Seek support early:** Report any concern to your line manager if you are struggling with your role or learning; request support where needed.
- **Be open about barriers:** Share any barriers that may affect completion, e.g., neurodiversity such as dyslexia. The Council will consider and implement reasonable adjustments with advice from relevant professionals, e.g., Occupational Health, Health & Safety, or Access to Work.
- **Engage constructively:** Be honest in discussions with your line manager, Organisational Development, Human Resources, and Occupational Health.
- **Share learning:** Where appropriate, share knowledge, and support colleagues.
- **Adhere to PROUD:** Every learner must abide by the expectations set out within the [PROUD Learner Code of Conduct](#).

Line Managers

- **Know the requirements:** Understand this policy and the Relevant Qualification requirements for the roles you manage.
- **Enable learning:** Provide time and access to resources (e.g., study leave, exam time, learning materials, on- and off-the-job learning activities).
- **Enable continuous professional development:** Encourage employees to fulfil ongoing learning obligations relevant to their positions and ensure accurate maintenance of learning records. Review progress and the practical application of skills and knowledge during regular check-ins and Annual

Reviews. All officers within scope are required to establish a CPD objective in their annual review, which should be monitored consistently in subsequent check-ins with their manager.

- **Set goals:** Discuss how qualification pathways align with Council objectives; set performance goals that incorporate learning, and support career development aspirations.
- **Balance workload:** Encourage and guide employees to manage workload alongside study; adjust priorities where needed.
- **Ensure application:** Ensure employees apply new skills and knowledge to improve service and team performance; encourage knowledge-sharing.
- **Evaluate impact:** Assess the effectiveness of learning against service and individual objectives.
- **Plan operationally:** Work with Organisational Development to plan learning to maintain service continuity.
- **Intervene early:** Seek advice from Human Resource or Organisational Development colleagues if an employee is struggling; consider support, adjustments, or alternative pathways.
- **Act where necessary:** Take appropriate action if employees cannot or will not undertake or complete the qualification. Ensure that conversations and formal notifications are undertaken to recoup costs, if appropriate.

Human Resources & Organisational Development

- **Interpret & guide:** Offer guidance on this policy and signpost to support and learning opportunities.
- **Resource planning:** Work with line managers to ensure employees have support and resources to balance work and study.
- **Early support:** Advise managers when an employee struggles to complete learning or any aspect of their role; recommend adjustments or interventions.
- **Policy upkeep:** Review and update the policy ongoing (and formally review) to reflect legislative changes and learning outcomes.

8. Acting-Up Arrangements

We recognise that temporary acting-up may be necessary for continuity of service.

- Temporary acting-up shorter than qualification duration. Starting the qualification is not required but is strongly encouraged to support succession and readiness for permanent roles.
- Acting-up equal to or longer than the qualification duration. The employee must commence and complete the relevant qualification during the acting period.

Conditions

- Acting-up must be documented (rationale, expected duration).
- Arrangements must be regularly monitored to ensure service quality and regulatory expectations are maintained.
- If acting-up becomes permanent, qualification requirements apply immediately.

Line managers must ensure that service quality is maintained, and tenants are not adversely affected during acting-up.

9. Financial support & repayment terms (Excludes courses funded through the apprenticeship levy)

The Council may pay for employees to work towards and complete a Relevant Qualification. Where costs are not covered by the Apprenticeship Levy, employees receiving financial assistance (fees, expenses, materials, exams, and other associated costs) agree to the following repayment terms:

Retention period

Employees are expected to remain employed until the qualification is achieved and for 24 months afterwards (running from the award date on the official certificate).

Leaving our Council

If an employee has received financial assistance for a Relevant Qualification funded outside of the Apprenticeship Levy, and they leave the Council before achieving the qualification, or within 24 months of the qualification award date, the following repayment terms apply:

Fees and expenses will be reclaimed on a pro-rata basis according to when an employee leaves employment following completion of the course or qualification. The calculation will be as follows:

$1/24 \times \text{Total of fees and expenses} \times \text{number of whole months remaining in 24 months period after qualification award date.}$

For leavers, amounts outstanding will be deducted from the final salary payment. If there are insufficient funds or other extenuating circumstances that prevent full or partial deduction, then an invoice for the full or remaining balance will be sent to the employee for payment.

This process will occur for employees still in employment, but who have not successfully completed the course, achieved the qualification, or have not adhered to Learner Agreements.

Note: This clause applies only where the qualification and associated costs have been funded outside of the Apprenticeship Levy. Levy funded courses are excluded unless a separate written agreement explicitly states otherwise.

Failure to sit or pass assessment

The Council may withdraw funding or require repayment where an employee unreasonably fails to achieve the required qualification (e.g., withdraws, fails to sit an exam or assessment, or does not pass). In these circumstances, unless the Council uses discretion not to pursue repayment, costs become repayable at the earliest of:

- the date the employee withdraws from the course, or
- the date the employee fails to sit an examination or assessment, or
- Twenty-four months from the start date of course if the employee has not achieved the qualification within that time.

Discretion and hardship

The Council may consider hardship, alternative repayment schedules, or partial waivers where appropriate and equitable.

Note: Where qualifications are funded via the Apprenticeship Levy, these repayment terms do not apply.

10. Professional Memberships & CPD

The Council is committed to ensuring that all employees in roles identified as in scope maintain the skills, knowledge and professional standards required to deliver safe, high-quality housing services in line with the Competence and Conduct Standard.

Professional competence will be maintained and evidenced through a combination of role-specific training, continuous professional development (CPD), performance management processes and access to sector-wide learning resources (e.g. Housing Quality Network).

Requirement to Maintain Membership (In-Scope Roles)

The Council recognises the value of professional body membership (e.g. Chartered Institute of Housing (CIH)) in supporting individual development, professional credibility, and sector engagement.

- Professional membership is encouraged for employees in-scope roles.
- Professional membership is not mandatory at this stage and is not funded beyond any existing contractual or corporate commitments.
- Employees undertaking CIH-accredited qualifications, including through an apprenticeship route (e.g. Level 4 housing apprenticeships), are not required to hold professional membership to enrol on, undertake, or successfully complete their qualification.
- Completion of a CIH-accredited qualification may make an individual eligible to apply for an appropriate grade of professional membership with CIH; however, membership remains optional and subject to individual application and any associated fees.
- The Council reserves the right to review this position and to introduce mandatory professional membership requirements in the future, should this be necessary to assure competence and compliance with regulatory standards.

CPD, Competence and Record-Keeping

All employees occupying roles that fall within scope of the qualification and competence requirements (see Section 3) must, as a matter of policy:

- Maintain role-specific competence through completion of training, skills, and capability requirements outlined in corporate training plans, skills matrices, and service-level expectations.
- Participate in annual performance and development reviews, including at least one objective related to maintaining or enhancing professional competence.
- Undertake ongoing CPD that demonstrates the application of learning to their role and contributes to service priorities, tenant outcomes, safety and quality standards.
- Record and evidence CPD activity through agreed Council systems (e.g. LMS, appraisal documentation), including learning plans, activities, reflections, and completion records.

- Adhere to the Council's Learner Code of Conduct and professional behavior expectations as set out in this Policy.

Evidence for Performance Management and Regulator Audits

To evidence competence and compliance:

- Employees must make CPD records, learning transcripts, and other relevant documentation available upon request to support performance management, development reviews, and assurance activity.
- Evidence must also be made available when requested during regulatory, compliance, or external assurance audits conducted by the Regulator or other competent authorities.

Data Handling

All CPD and competence records provided to the Council will be managed in accordance with the Council's information governance and data protection policies.

Employees remain responsible for ensuring that any personal learning portals or professional body accounts are accurate and that relevant documentation can be shared promptly when required.

Non-Compliance

Where an employee fails to maintain required levels of competence, engage with CPD, or provide evidence when reasonably requested, this will be addressed through the Council's performance management, capability, or disciplinary procedures, taking account of mitigating circumstances and reasonable adjustments.

Note: Where an employee moves into a role that is out of scope, the requirements set out in this section cease to apply for the Council's professional and compliance purposes.

11. Failure to commence or attain the Relevant Qualification

We must comply with CCS requirements; therefore, employees in scope must successfully complete and attain a Relevant Qualification unless an exemption applies.

- Refusal to commence/complete: May be treated as failure to follow reasonable management instruction, managed under the Disciplinary Policy.
- Unable to commence/complete: Will be addressed supportively under the Capability Policy, considering all mitigating factors and individual circumstances. Supportive steps, reasonable adjustments, mentoring, workload planning, timetable changes, and where suitable redeployment, will be explored before formal action.

12. Support with Learning

Support is available from:

- Line Manager - workload planning, study leave, integration of learning goals into objectives.
- Training Provider - curriculum, assessment, learner support services.
- Organisational Development - routes to qualification (levy vs non-levy), provider liaison, learning plans.
- Human Resources - policy interpretation, adjustments, redeployment options, employee relations advice.
- Trade Union - representation and support.

13. Care-Experienced Clause

We recognise care-experienced colleagues may face unique challenges in accessing and completing formal qualifications due to disrupted education, reduced support networks, or socio-economic disadvantages. The Council will:

- Provide tailored learning support, including mentoring and coaching.
- Offer flexible qualification timelines where reasonable and operationally feasible.
- Ensure access to financial support and hardship assistance, including consideration of repayment terms where appropriate.
- Promote a trauma-informed approach to learning and development.
- Encourage safe disclosure, ensuring confidentiality and respect.
- Monitor outcomes and feedback to identify and address disparities in access, completion, or progression.

14. Associated policies

- Equality, Diversity, Inclusion and Belonging
- Training Policy and Procedure
- PROUD Learner Code of Conduct
- Flexible Working Policy
- Absence Management Policy and Procedure
- Leave Policy
- Probationary Period Policy
- Capability Policy
- Disciplinary Policy
- Early Retirement / Voluntary redundancy Policy and Procedure
- Leavers Policy

15. Equality and Diversity Statement

South Tyneside Council is committed to promoting equality and valuing diversity. An equality check for this policy was carried out in April 2026. Equality implications were identified and mitigation of these have been highlighted in the EqlA statement.

16. Governance & Document Control

Author: Amanda Glenister & Amy Norton, OD Advisors

Effective Date: 27 May 2026

Review Date: 27 May 2029

Sign-off: Claire McLaren, Assistant Director, People and Organisational Change

This policy does not form part of any employee's contract of employment or other contract to provide services. The Council may amend it at any time.

17. Monitoring & Review

This policy will be monitored and reviewed every three years, or earlier if required (e.g., changes in legislation or CCS guidance), to ensure employees and managers can rely on up-to-date guidance and the policy remains effective.

Policy approved by:	Policy Review Group
Last updated/reviewed:	27 May 2026
Date issued:	TBC
Date of next review:	27 May 2029

Equality Impact Assessment (EqIA)

All public authorities are required to, in carrying out their functions, show due regard for the need to: eliminate unlawful discrimination; advance equality of opportunity between people who shared a protected characteristic and those who don't; and foster good relations between people who share a relevant protected characteristic and those who do not (Equalities Act 2010).

Services are responsible for ensuring that EqIAs are completed to help inform decision making on all relevant Key Decisions, new or revised policies and any substantial proposed changes to services.

This process helps decision makers to assess, and evidence that they have assessed, the potential implications of a proposed policy or service change on service users with protected characteristics. It supports reflection on implications for different groups and prompts the identification of any mitigation activities that may need to be taken to minimise potential inequalities that could result from the proposal.

Directorate	Business Resource &	Service	People & Organisational Change
Responsible Officer (Title)	Amy Norton	Date of Assessment	09/04/2026
Brief description of the proposed new or altered policy or service?			
The implementation of a Housing Professionalisation and Development Policy is intended to address the requirements set forth by recent government regulations, including the Regulator of Social Housing's Competence and Conduct Standard and the Social Housing (Regulation) Act 2023. The primary objective of this policy is to ensure that housing management staff, particularly those in critical positions, possess recognised qualifications and maintain up-to-date knowledge relevant to their roles. This initiative is designed to elevate service standards for tenants and promote consistent professionalism within the sector.			
The policy requires housing leaders/managers who spend 50% or more of their role managing delivery of housing management services to social housing tenants, and who do not already hold a relevant qualification, to achieve an Ofqual-regulated housing qualification, typically a CIH Level 4 Apprenticeship* for Senior Housing Managers/Leads and Level 5 for Senior Housing Executives, depending on role scope). This includes senior housing managers such as Directors and Deputy Directors who will be required to complete a CIH Level 5 qualification if they do not already hold the relevant qualification.			
The policy sets out scope, qualification routes, support available (including study time and reasonable adjustments), acting-up arrangements, exemptions, funding/repayment rules (where applicable), and how non-completion will be managed to ensure regulatory compliance and service quality.			

*Apprenticeships require employees to spend 6 hours per week away from their day-to-day role for learning (“off-the-job” training). This time is paid, workloads should be adjusted accordingly, and terms and conditions of employment remain unaffected.

Under the policy, managers are required to obtain formal, regulated housing qualifications to standardise competencies, enhance service quality, and demonstrate compliance with stricter regulatory expectations. In addition, the policy specifies support measures for staff pursuing these qualifications, such as allocated study time and adjustments to workloads. These provisions align with the forthcoming commencement of the Regulator of Social Housing’s new Competence and Conduct Standard (CCS) in October 2026 and the requirements under the Social Housing (Regulation) Act 2023.

Who are the main customer or employee groups affected by this new or altered policy or service?

- **Housing managers/leaders in scope:** roles where **50%+** of duties relate to managing the delivery of housing management services, who do not already hold the required housing qualification and will be required to complete it. Typically, CIH Level 4 for Senior Housing Managers/Leads and CIH Level 5 for Senior Housing Executives, including senior housing managers such as Directors and Deputy Directors, depending on role scope.
- **Line managers and senior leaders:** responsible for supporting employees through qualification: e.g., workload planning, protected study time, wellbeing support and performance/compliance discussions.
- **HR colleagues** who will need to review and, where required, update Job Descriptions and Person Specifications to reflect the regulatory criteria/qualification requirements, alongside recruitment, employee relations and policy support.
- **OD:** who will administer apprenticeship/qualification routes, coordinate training providers, set up and manage learner cohorts, and track and monitor progress. This will include reporting on participation, progress, completions and withdrawals). This will place a significant additional workload on OD during implementation and throughout the life of each cohort.
- **Indirectly, tenants/service users:** Those who receive housing management services (potential service improvement benefits and any short-term operational impacts while staff undertake learning).

What evidence and engagement has been considered to inform this assessment?
(Please reference and summarise data sources or engagement exercises and their findings)

- **Review of the regulatory requirements driving the change:** Including the Regulator of Social Housing Competence and Conduct Standard (CCS) (commencing October 2026) and the Social Housing (Regulation) Act 2023, to confirm the organisation’s obligations and roles in scope.
- **Engagement with internal housing senior managers:** Including Heads of Service and Directors to agree the scope, including the 50%+ threshold, implementation approach, and anticipated workforce impacts. This has included time and wellbeing considerations.
- **Benchmarking and learning from a neighbouring local authority:** This authority is further advanced in implementing housing professionalisation requirements, allowing us to understand lessons learned (e.g., communication approaches, cohort planning, workload management, and learner support).
- **Briefings with managers:** To ensure early awareness that the requirement is forthcoming, enabling workforce planning, early identification of support needs, and consistent messaging to affected employees.

- **Initial workforce scoping (OD/HR):** OD/HR have used initial 2024–25 scoping to identify likely in-scope roles and potential qualification gaps; this will be refreshed and revalidated as part of implementation to ensure the scope remains accurate and up to date.

Identification and description of impact. Please identify where there is a positive, neutral or negative impact. Then describe in more detail the nature of any identified potential disproportionate negative impact, including any potential barriers to access, existing or anticipated unequal outcomes or experiences, and effect on intra-group relations and community cohesion:

The Nine Protected Characteristics (as identified by the Equalities Act 2010)

Age	Neutral (mixed)	Potential impact: mixed/neutral overall (policy applies irrespective of age), with potential for disproportionate negative impacts for some age groups if support is not in place. Positive/neutral: The qualification requirement applies irrespective of age and may support consistent standards, clearer development pathways and improved confidence/competence across the workforce. Potential impacts (Age): Some colleagues, particularly those who are older and/or have been out of formal education for a long period, may experience increased anxiety and stress linked to academic assessment, writing requirements, exams, use of online learning platforms and study skills. Colleagues who are closer to retirement may perceive reduced personal benefit from completing a lengthy qualification; however, some may still want to undertake the qualification for professional pride, confidence, or future employability. Barriers/unequal outcomes: Without appropriate support (e.g., protected study time, coaching in study skills/digital confidence, and reasonable adjustments where needed), there is a risk of slower progress or non-completion for some older learners. Where colleagues are nearing retirement, consideration of proportionate approaches (e.g., deferral/exemption where appropriate and lawful) should be clearly communicated to avoid unintended inequality or inconsistent treatment. If optional participation is offered for those not required to complete, this should be managed transparently to avoid perceived unfairness between age groups. Intra-group relations/community cohesion: If not managed sensitively, the change could contribute to assumptions about capability based on age, or perceptions that different age groups are being treated differently (e.g., around deferrals/exemptions for colleagues nearing retirement). Consistent criteria, clear communication, and access to support for all learners will help maintain good relations within teams.
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Disability	Negative	Potential impact: Mixed overall (policy intention is positive), with a potential disproportionate negative impact for some disabled and/or neurodivergent colleagues due to the additional demands of completing a Level 4/5 qualification alongside an operational role. Neurodiversity / hidden disabilities: Colleagues with dyslexia, ADHD, autism, dyspraxia and some mental health conditions may experience barriers linked to high volumes of reading/writing, processing speed, focus, executive functioning (planning/organisation), group learning, and assessment anxiety. This may increase stress and the risk of slower progress or non-completion without support. Blended learning barriers (online + campus + self-directed): Online sessions: may require captions, transcripts, accessible slide formats, appropriate pacing, and regular breaks; can be harder for some colleagues with hearing/visual impairments, fatigue, migraines, or attention/processing differences. On-site/campus sessions: may create barriers relating to travel, mobility, pain, fatigue, sensory overload, access to quiet space, accessible parking, hearing loops, room layout, and suitable seating. Self-directed study: can disproportionately impact colleagues who need more structure, coaching, or extended time to complete reading/writing tasks, particularly alongside work demands and fluctuating health conditions. Additional support/time required: Some colleagues may require protected study time beyond the minimum, assignment planning support, study skills coaching, assistive software (e.g., text-to-speech/speech-to-text), alternative formats, and assessment adjustments (e.g., extra time, rest breaks, separate room, remote attendance where possible). Barriers to access / unequal outcomes: If reasonable adjustments and protected learning time are not applied consistently, disabled colleagues may be more likely to experience reduced wellbeing, slower progress, or non-completion, which could result in unequal outcomes (including potential performance/capability consequences) that correlate with disability. Intra-group relations/community cohesion: Adjustments (extra time, flexible attendance, alternative arrangements) can be misunderstood as “special treatment” if not well communicated and managed consistently. Clear messaging that adjustments remove

		disadvantage (and are a legal requirement) will help maintain positive working relationships.
Sex	Neutral / No Impact	Potential impact: Mixed overall, with a potential disproportionate negative impact linked to caring responsibilities and parental leave arrangements. Caring responsibilities (indirect impact): The requirement to complete a Level 4/5 qualification alongside an operational management role may disadvantage employees who have substantial caring responsibilities (e.g., childcare, elder care). While this can affect employees of any sex, there is a risk of disproportionate impact on women, due to wider evidence that women undertake a greater share of unpaid childcare and domestic work. This can reduce flexibility to attend taught sessions (online or on-site), complete self-directed study outside working hours, and meet deadlines, potentially increasing stress and fatigue. Maternity/adoption/shared parental/paternity leave: Employees taking maternity/adoption/shared parental/paternity leave during the qualification period may require changes to timelines, cohort participation and assessment scheduling. If processes are inflexible, this could lead to unequal outcomes (e.g., delayed completion or disadvantage on return). Equally, some employees may want to continue learning while on leave or soon after returning; this should be supported safely and without pressure. Barriers to access / unequal outcomes: If protected learning time and workload adjustments are not applied consistently, those with caring commitments may be more likely to need extensions, progress more slowly, or withdraw, creating unequal outcomes that could correlate with sex. There is also a risk that access to progression opportunities could be affected if qualification completion is required before appointment to certain roles. Intra-group relations/community cohesion: If flexibility (e.g., deferrals, deadline extensions, remote attendance) is not applied consistently and transparently, this may create perceptions of unfairness. Clear criteria and consistent management support will help maintain positive working relationships. Evidence: ONS time-use evidence indicates employed women with dependent children spend more time on unpaid childcare and unpaid household work than men. CIPD research on working carers reports that women are more likely than men to find it difficult to combine paid work and caring responsibilities—highlighting the importance of flexible, supportive arrangements.
Sexual Orientation	Neutral / No Impact	Potential impact: The qualification requirement applies equally regardless of sexual orientation and there are no

		anticipated direct disproportionate impacts specifically linked to sexual orientation. Potential indirect impacts / barriers: Some LGBTQ+ colleagues may be less comfortable disclosing personal circumstances that affect learning capacity (e.g., relationship breakdown, family rejection, or stress linked to discrimination), which could reduce access to support. If learning takes place partly on campus and involves group discussion/assessed presentations, a non-inclusive environment could negatively affect psychological safety, participation and confidence for some LGBTQ+ learners. Any harassment, bullying, or “banter” related to sexual orientation could compound stress during an already demanding period of study, potentially affecting progress. Unequal outcomes: Unequal outcomes are not expected, but could occur indirectly if LGBTQ+ staff feel less able to ask for flexibility or support, or if learning environments are not consistently inclusive. Intra-group relations/community cohesion: Done well, the policy should have a neutral effect. However, poor behaviours within cohorts (exclusionary language, stereotypes) could damage team cohesion. Clear expectations on respectful behaviour, inclusive facilitation, and routes to raise concerns help foster good relations.
Gender Reassignment	Neutral / No Impact	Potential impact: The qualification requirement applies equally regardless of gender reassignment and there are no anticipated direct disproportionate impacts specifically linked to gender reassignment. Potential indirect impacts / barriers: Time off for appointments/treatment: A trans employee may need time away from work for medical appointments, treatment and/or recovery (which may not always be predictable). This could affect attendance at taught sessions (online or on-site), ability to complete self-directed study, and meeting assessment deadlines—potentially increasing stress if the programme is inflexible. Privacy and confidentiality: Participation in cohorts, provider systems, ID documents, email addresses, and records (e.g., names/titles/pronouns) may create risks around confidentiality or accidental disclosure if not managed carefully. Learning environment/psychological safety: If any insensitive language, “banter”, or discrimination occurs within cohorts or on campus, this could negatively affect participation, confidence and wellbeing during study. Barriers to access / unequal outcomes: Unequal outcomes are not expected, but could occur indirectly if flexibility is not available around programme milestones, or

		if a trans colleague feels less able to request adjustments/time due to concerns about stigma or confidentiality. Intra-group relations/community cohesion: Done well, the policy should have a neutral effect. However, inconsistent handling of confidentiality or poor behaviours could damage team cohesion. Clear standards on respect and inclusion, and clear routes to raise concerns, will help maintain good relations.
Marriage or Civil Partnership (in employment only)	Choose an item.	None
Pregnancy and Maternity	Negative	Potential impact: Mixed overall, with a potential disproportionate negative impact for employees who are pregnant, on maternity/adoption leave, or returning from leave, due to timing, health considerations, and the demands of completing a qualification alongside work. Pregnancy-related barriers: Pregnancy can involve fatigue, nausea, medical appointments, and periods where concentration/energy are reduced. This may affect attendance at taught sessions (online or on-site), ability to complete self-directed study, and meeting assessment deadlines—particularly where teaching or assessment timetables are fixed. Maternity/adoption leave (pause and return): Where an employee goes on maternity/adoption leave during the qualification, their learning should be paused and they should be supported to re-join a later cohort or resume on return to work, without detriment. A lack of a clear “pause and restart” approach could create unequal outcomes (e.g., falling behind, pressure to study during leave, or inconsistent treatment). Paternity/partner leave (same principle): The same approach should apply to partners taking paternity leave and/or shared parental leave, i.e., the ability to pause learning and re-commence on return, recognising caring responsibilities and adjustment to new parental demands. Unequal outcomes: If cohort scheduling, assessment deadlines or performance expectations are inflexible, there is a risk of delayed completion, higher stress, or withdrawal for those taking pregnancy/maternity/paternity/parental leave. This could result in unequal outcomes (including progression or performance/capability consequences) linked to pregnancy/maternity status. Intra-group relations/community cohesion: If pausing/re-joining arrangements are not applied consistently and transparently, colleagues may perceive unfairness. Clear

		criteria and consistent practice (communicated in advance) will help maintain good relations and psychological safety.
Race (including colour, ethnicity, nationality or national origin)	Negative	Neutral (mixed) / potential indirect disproportionate impact Potential impact: The qualification requirement applies equally regardless of race/ethnicity/nationality, so no direct disproportionate impact is anticipated. However, there is potential for indirect disproportionate impact depending on language, assessment format, and (where an apprenticeship route is used) eligibility checks required by the training provider. Potential indirect impacts / barriers: English as an additional language (EAL): Where English is not a colleague's first language, academic writing requirements, reflective assignments, professional terminology and assessment methods may require additional time and support, potentially increasing pressure and affecting confidence. Cultural confidence/safety: Some colleagues may be less likely to request support or extensions due to cultural expectations or previous negative experiences, which can create unequal access to adjustments and pastoral support. Learning environment: Cohort-based learning (online and on-site) relies on psychologically safe participation. Any experiences of bias, microaggressions or exclusion within learning groups could increase stress and reduce engagement. Apprenticeship eligibility / documentation (nationality/residency): Apprenticeship funding is subject to national eligibility rules. Where the qualification is delivered through an apprenticeship route, learners may need to evidence eligibility (e.g., right to work and relevant residency/immigration status requirements) and providers may request documentation checks in line with ESFA/DfE Apprenticeship Funding Rules. If not handled consistently and sensitively, this could create additional barriers or anxiety for colleagues of different national origins. Unequal outcomes: Unequal outcomes are not expected, but could occur indirectly if EAL learners or colleagues experiencing discrimination have reduced access to support, leading to slower progress, non-completion, or increased stress, which may then affect performance management outcomes. Intra-group relations/community cohesion: If not actively managed, learning cohorts can amplify "in-group/out-group" dynamics. Clear expectations on

		respectful behaviour, inclusive facilitation, and clear routes to raise concerns help foster good relations and reduce the risk of conflict or exclusion.
Religion belief	or Neutral / No Impact	Potential impact: The qualification requirement applies equally regardless of religion or belief, so no direct disproportionate impact is anticipated. However, there is potential for indirect disproportionate impact where teaching, assessment, or cohort schedules conflict with religious observance or where wellbeing is affected during periods of fasting. Potential indirect impacts / barriers: Ramadan (and other fasting periods): Colleagues who are fasting may experience reduced energy, concentration, or increased fatigue, particularly later in the day. This could make it harder to attend long taught sessions, engage in group work, or complete assessments during peak fasting periods, potentially increasing stress. Religious holy days and festivals: Course dates, exams, assessments, or mandatory campus sessions may inadvertently fall on religious holy days (e.g., Eid, Diwali, Yom Kippur, Easter, Christmas and other faith-specific observances), creating barriers to attendance or disadvantaging learners who cannot participate on those dates. Prayer requirements: On-campus days may require access to suitable spaces for prayer and the ability to take breaks at appropriate times. Unequal outcomes: Unequal outcomes are not expected, but could occur indirectly if there is limited flexibility around exam/assessment dates, attendance requirements, or deadlines during key religious periods. Intra-group relations/community cohesion: If flexibility (e.g., alternative dates, reasonable timetable adjustments) is not understood or is applied inconsistently, it could lead to perceptions of unfairness. Clear communication and consistent application of adjustments will support good relations and inclusion.
Other Groups		
Care Leavers	Neutral / No Impact	Potential impact: The qualification requirement is role-based and applies consistently, so no direct disproportionate impact is anticipated. However, there is potential for indirect disproportionate impact for care leavers (and those still in the care system) due to prior educational disruption, reduced informal support networks, and additional personal responsibilities that can affect capacity to undertake study alongside work.

		Potential indirect impacts / barriers: Care-experienced colleagues may be more likely to have had interrupted schooling or negative experiences of education, which can reduce confidence with academic writing, exams/assessments and classroom settings. Some may also have ongoing practical pressures (e.g., housing insecurity, financial pressures, managing appointments/support services), which can make attendance at on-site sessions and self-directed study harder and can increase stress. Unequal outcomes: Unequal outcomes are not expected, but could occur if the programme is delivered inflexibly or without tailored support, leading to slower progress, non-completion, or increased anxiety for some care-experienced learners—potentially affecting performance management outcomes. Intra-group relations/community cohesion: If additional support or flexibility is needed, it should be handled sensitively and confidentially. A supportive approach and clear routes to request help will help maintain good relations and psychological safety within cohorts and teams.
Armed Forces Veterans	Neutral (mixed)	Potential impact: The qualification requirement is role-based and applies consistently, so no direct disproportionate impact is anticipated. However, there is potential for indirect disproportionate impact for some veterans due to service-related health needs and the additional pressure of completing a Level 4/5 qualification alongside a demanding operational role. Potential indirect impacts / barriers (including PTSD): Some veterans may have service-related physical or mental health conditions. Where PTSD, anxiety or related trauma impacts apply, fixed deadlines, assessments, group learning and on-site attendance may increase stress and affect concentration/sleep, potentially increasing risk of slower progress or non-completion without support. Additional support/time required: Some colleagues may require additional protected study time, flexibility around attendance and deadlines, the option to step out of sessions, and alternative arrangements for presentations/assessments where appropriate. Support should be offered in a confidential, trauma-informed way, with routes to Occupational Health/EAP support and consistent manager check-ins. Unequal outcomes / cohesion: Unequal outcomes are not expected, but could occur indirectly if support is not offered or accessed, leading to increased stress, slower progress or non-completion. Any adjustments should be handled sensitively and consistently to avoid

		misunderstandings and to maintain positive working relationships within cohorts and teams.
Those at risk of socio-economic disadvantage	Neutral / No Impact	Those at risk of socio-economic disadvantage – Identification and description of impact: Neutral (mixed) / potential indirect disproportionate impact** Potential impact: The apprenticeship route (e.g., CIH Level 4) is fully funded via the Apprenticeship Levy, which reduces direct financial barriers to accessing the qualification. However, there remains potential for indirect disproportionate impact for colleagues at risk of socio-economic disadvantage, linked to time pressures, travel/attendance costs, access to equipment/study space, and for Level 5 where applicable) repayment/clawback arrangements if an employee leaves within a specified timeframe. Costs and expenses: Where learning includes on-site/campus attendance, employees may incur travel/subsistence costs. Although expenses can be claimed in line with the Council's expenses arrangements, reimbursement is limited to eligible items and there can be a short-term cashflow impact if costs are incurred upfront. This may create a barrier for some employees and should be managed to avoid disadvantage. Level 5 clawback (non-apprenticeship funded): Where CIH Level 5 is funded outside the apprenticeship route, the Council's training policy includes a repayment/clawback approach if the employee leaves within a defined period after completion (or other circumstances set out in the policy). While this protects public funds, it may have a greater impact on employees with lower financial resilience and may influence decisions about mobility or progression. Clear communication and consistent application are important. Prior educational experience / confidence with learning: Employees who have not been in education for a long time (including since school) and/or who have limited prior qualifications may face additional barriers in a formal learning environment (academic writing, exams/assessments, use of online learning platforms). They may require additional time and support (study skills, coaching, structured check-ins) to progress at the same pace, and may experience increased stress if this is not provided. Unequal outcomes / cohesion: Unequal outcomes are not expected, but could occur if employees feel unable to participate fully due to financial pressures or lack of learning confidence, leading to slower progress or withdrawal, which may then have performance implications. Transparent communication about funding routes, what expenses can be reimbursed, when clawback applies (Level 5 only), and

	the support available will help maintain fairness and good relations.
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Please indicate what actions you intend to take to mitigate negative impact, where it has been identified

The following actions covers disability/neurodiversity, caring responsibilities, religion, race/EAL, pregnancy/parental leave, veterans/PTSD, care leavers, socio-economic disadvantage and also reflects and refers to STC Training, Learning & Development Policy and Apprentice Expenses guidance:

1. **Protected learning time & workload planning:** Ensure all learners have protected paid time to complete learning requirements (including apprenticeship off-the-job learning) and that managers actively review/adjust workloads, priorities and deadlines during peak learning/assessment periods.
2. **Manager briefing and consistency:** Provide guidance to managers on their responsibilities (workload planning, wellbeing check-ins, consistent handling of study time, extensions/deferrals, and performance conversations) to reduce inconsistent practice and perceived unfairness.
3. **Reasonable adjustments & learner support:** Put in place early identification of support needs (including neurodiversity/hidden disability and mental health), with reasonable adjustments agreed with HR/OH/training provider (e.g., assistive technology, alternative formats, extra time/rest breaks, quiet space, flexible attendance).
4. **Blended learning accessibility:** Ensure online sessions are accessible (captions/transcripts where needed, accessible materials, appropriate pacing and breaks) and ensure on-site venues are accessible (step-free access, toilets, suitable seating, hearing loop where needed).
5. **Flexible scheduling around protected characteristics:** Where feasible, avoid scheduling key assessments/on-site sessions on major faith holy days and build in flexibility during periods such as Ramadan (e.g., timing of sessions, breaks, and alternative dates where possible).
6. **Parental leave ‘pause and restart’:** Where an employee goes on maternity/adoption/shared parental/paternity leave, apply a clear process to pause learning and support re-joining a later cohort / resuming on return, without detriment.
7. **Academic skills / return-to-learning support:** Provide additional study-skills support for colleagues who have not been in education for a long time (or since school), including coaching on academic writing, digital learning platforms, and structured check-ins to reduce anxiety and non-completion risk.
8. **EAL support and inclusive learning environment:** Offer support for colleagues with English as an additional language (e.g., guidance on assignments/terminology) and set clear expectations for respectful behaviour in cohorts to prevent exclusion/microaggressions and maintain psychological safety.
9. **Trauma-informed wellbeing support:** For veterans (and others) who may experience trauma-related mental health impacts (including PTSD), offer confidential, trauma-informed support options (EAP/OH), flexibility around

presentations/attendance where needed, and regular manager check-ins to reduce stress risk.

10. Financial barriers (expenses and clawback clarity): Ensure employees understand what is fully funded (e.g., levy-funded apprenticeship routes) versus what may be non-levy funded (e.g., Level 5 where applicable). Communicate repayment/clawback arrangements clearly and consistently for non-levy funded qualifications in line with the policy (including discretion/hardship considerations where applicable). Reduce financial barriers for on-site attendance by signposting and supporting expense claims in line with the Council process (e.g., travel and lunch claims) and ensuring claims are processed promptly. (Ref: Council Training, Learning & Development Policy sections on learning time/repayment; and “Apprentice Expenses” guidance.)

11. OD/HR implementation controls: OD/HR to maintain a cohort tracker, monitor progress/withdrawals, escalate “at risk” learners early, and use lessons learned from each cohort to improve support and reduce unequal outcomes.

Are there any negative impacts that cannot reasonably be avoided? If so, on balance, please describe your rationale for why it is still appropriate to proceed with the proposal.

Some negative impacts cannot be fully avoided. In particular, there is an unavoidable increase in workload and potential stress for some employees who are required to complete a Level 4/5 qualification alongside a demanding operational role, including time required for teaching sessions (online/on-site) and self-directed study.

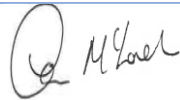
There may also be unavoidable impacts associated with fixed assessment windows and the requirement to evidence competence within regulatory timescales, which may affect employees differently depending on personal circumstances (e.g., disability/neurodiversity, caring responsibilities, pregnancy/parental leave, faith observance periods).

On balance, it is still appropriate to proceed because the proposal is driven by external regulation (the Regulator of Social Housing’s Competence and Conduct Standard, commencing October 2026) and is required to ensure compliance, strengthen competence and consistency in housing management, and protect service quality and outcomes for tenants. The Council will mitigate impacts as far as reasonably practicable through protected study time, workload planning, reasonable adjustments, flexible cohort management (where possible), and consistent manager support, but the core requirement to professionalise and evidence competence in regulated roles cannot be removed without creating material compliance and service risks.

How do you plan to monitor ongoing impact and the effectiveness of any identified mitigation activities?

- 1. OD cohort tracker & reporting:** OD will maintain a live cohort tracker covering: enrolment, attendance (online/on-site), off-the-job learning compliance (where apprenticeship), progress against milestones, assessment outcomes, withdrawals, completion dates and reasons for any breaks in learning. A summary dashboard will be produced at agreed intervals (e.g., monthly/quarterly) for Housing SMT/HR.
- 2. Equality monitoring:** Where data is available and appropriate, OD/HR will monitor participation, progress, deferrals/breaks in learning, and completion/withdrawal rates by protected characteristic (and relevant “other groups”, e.g., care leavers/veterans) to identify any emerging disproportionate impacts.

3. **Wellbeing and workload indicators:** Track themes from manager check-ins, sickness absence trends (including stress-related absence where reported), turnover in in-scope roles, and EAP/Occupational Health themes at an aggregate level to understand whether workload/stress mitigations are effective. This data should be easily accessible via HR and an agenda item at Community Operations Leadership Team meetings and Annual Review data. We will also provide feedback loops from current employees to minimise stress and poor wellbeing
4. **Feedback loops (learners and managers):** Collect structured feedback at key points (start, mid-point, pre-assessment, and end of cohort) from learners and line managers on workload, accessibility, inclusion (online/on-site), support received, and any barriers experienced; use this to adjust mitigations for the next cohort.
5. **Reasonable adjustments / accessibility monitoring:** Monitor number and type of reasonable adjustment requests, timeliness of implementation, and any recurring accessibility issues with training provider materials, online delivery, or campus venues; escalate issues to the provider and internal leads for resolution.
6. **Governance and review:** Agree a review cadence (e.g., quarterly) with Housing COLT/HR/OD to review monitoring data, confirm actions taken, update mitigations, and record decisions. Complete a formal review of the policy and EqlA after the first cohort (and thereafter every 3 years) or when regulatory guidance changes).

Responsible Officer Title & Sign-Off Date	<i>A. Norton</i> Amy Norton, OD Advisor, Lead for Community Operations. 09/04/2026	Assistant Director Title & Sign-Off Date	 Claire McLaren, Assistant Director – People & Organisational Change 21/05/26	Date presented at POD	27/05/26
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