



Insight - Customer Scrutiny Group

Shaping a Customer-Focused Code of Conduct
Regulator for Social Housing's Competency and Conduct Standard
Report and Recommendations - Thursday 21 May 2026

Overview of the Scrutiny Review

This scrutiny review examined the behaviours that matter most to customers in order to inform the development of a new Code of Conduct for Great Places. The work directly supports the Regulator of Social Housing's (RSH) Competency and Conduct element of the Transparency, Influence and Accountability Standard, introduced following the Grenfell Inquiry, which requires landlords to:

- Maintain an effective Code of Conduct that is understood, accessible, embedded, and regularly reviewed.
- Ensure customers have meaningful opportunities to influence the Code.
- Demonstrate how behaviours, professionalism, and accountability are applied in practice.

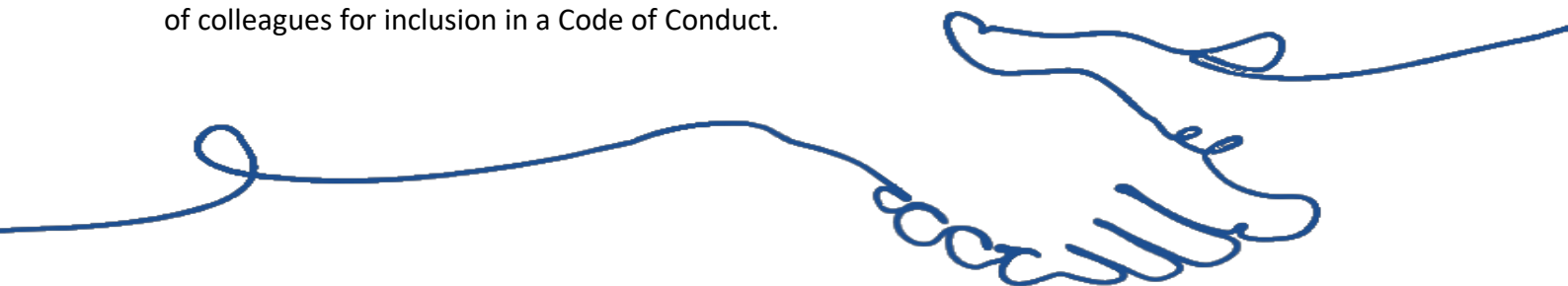
Great Places' intention to adopt a business-wide Code of Conduct, exceeding minimum regulatory expectations (which apply only to qualified roles) was viewed positively and as a strong foundation for lasting cultural change. The proposed recommendations based on the evidence reviewed are set out in **Appendix 1**.

Purpose of the Scrutiny Review

The aims and objectives of our review were to:

- Identify behaviours that matter most to customers to inform a Code of Conduct.
- Review existing Great Places customer experience documents and mechanisms.
- Explore how compliance with a Code could be measured and impact evaluated.

We reviewed what matters most to customers, in order to define the behaviours and values expected of colleagues for inclusion in a Code of Conduct.



Headlines

We found existing customer experience documents reflect customer feedback well and align with Great Places' vision for excellent customer service. Bringing these together into a single Code of Conduct would make expectations clearer and more consistent for colleagues.

A Code should guide day-to-day behaviour, shape culture, and inform customer interactions, and be regularly reviewed using customer insight to address any gaps. Previous scrutiny work often highlights recurring issues that continue to drive customer dissatisfaction. Used together, the Code and customer insight should support service improvement by showing what is working, what needs to change, and how Great Places is responding. This information should be shared with customers regularly in a clear and meaningful way.

Service Background

We received an overview of the Competency and Conduct Standard that was introduced following the Grenfell Inquiry to improve training, colleague behaviour, and handling of customer issues. The standard aims to drive cultural change by promoting professionalism, respect, and accountability, ensuring services are delivered consistently to a high standard. It will be monitored to assess how effectively it is applied in practice and whether it improves services and customer experience. Landlords are expected to have a written policy covering training and development, colleague appraisal, and the management of poor performance, alongside an embedded code of conduct that sets out the behaviours and skills required to deliver quality services.

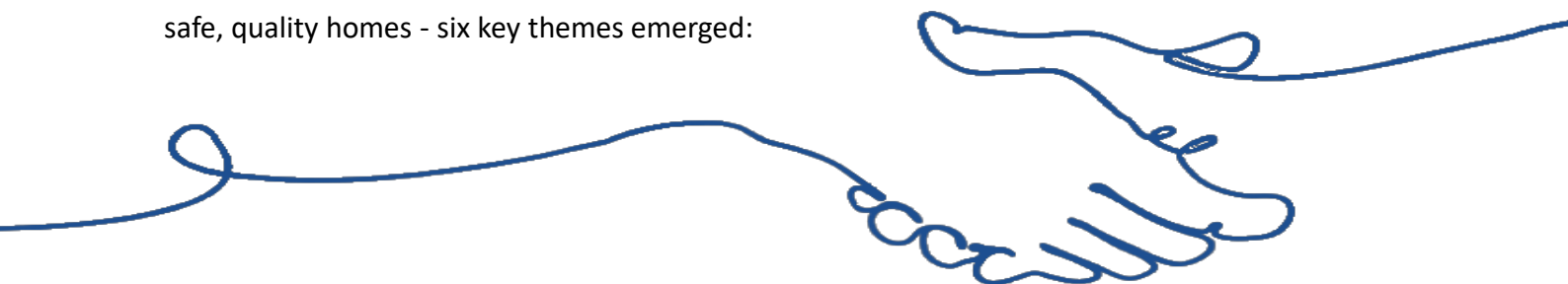
Our approach

We sought information to inform as follows:

- Conducted a desktop review to identify customer priorities using feedback from three key consultations that informed the Corporate Plan, Repairs Review and 10 Year Ambitions. This was also informed by our scrutiny review of complaint dissatisfaction and escalation cases, where no service failure was found, alongside recurring themes from other scrutiny reviews.
- Reviewed core documents including the customer experience strategy, the customer service commitments, and the service delivery framework.
- The Head of Customer Contact updated us on progress of ongoing *Service with Respect* work.
- Review of training and behavioural frameworks (I&W support model, Customer Experience Masterclass) and external Code of Conduct examples.

Our Findings and Key Supporting Information

We have listed key information observed in consultation feedback that helped inform our scrutiny work. Across all consultations / scrutiny activity, customers consistently highlight the importance of a reliable, respectful housing and repairs service that focuses on getting basics right and maintaining safe, quality homes - six key themes emerged:



- **Feeling Valued and Respected**

Customers expect courtesy, dignity, empathy, and active listening, particularly when raising concerns or feeling vulnerable.

- **Clear, Timely and Accurate Communication**

Customers want plain-language explanations, proactive updates, and information they can rely on without needing to chase.

- **Reliability and Consistency**

Doing what is promised, when promised, and delivering services in a predictable and joined-up way builds confidence.

- **Quick and Effective Resolution**

Customers value ownership and accountability, wanting issues fixed fully and first time wherever possible.

- **Easy Access to Services**

Service should be simple to access across channels, with minimal effort, repetition, or transfers for customers.

- **Transparency and Fairness**

Customers expect openness, clear reasoning behind decisions, equal treatment, and clarity about rights and responsibilities.

Scrutiny of Dissatisfaction Drivers in complaints with no service failure

Drivers of Escalation - scrutiny of complaints showed escalation was most likely when:

- Customers felt outcomes did not meet expectations.
- Customers disagreed with findings or did not understand decisions.
- Communication was unclear, delayed, or inconsistent.

This reinforces the importance of:

- Effectively understanding customer concerns early.
- Clearly setting realistic expectations.
- Explaining decisions transparently and consistently.

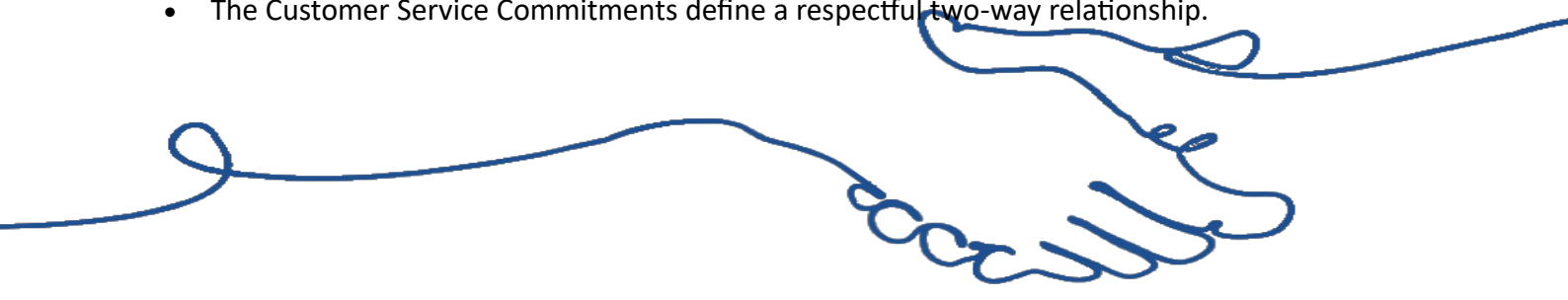
Key Dissatisfaction Themes

Data highlighted customer experience and repairs as common drivers of dissatisfaction, particularly where communication failed, recurring issues noted included; missed or unclear appointments, lack of updates, and unclear ownership and timescales. While complaint handling was largely compliant with the Housing Ombudsman Complaint Handling Code, greater clarity, structure, and consistency would improve transparency and customer understanding, **Appendix Two** shows full scrutiny detail.

Review of Key Customer Experience Documents

The review confirmed that existing frameworks strongly align with customer priorities, which are spread across multiple documents.

- The Customer Experience Strategy sets a clear, organisation-wide direction.
- The Customer Service Commitments define a respectful two-way relationship.



- The Service Delivery Framework supports consistent, purpose-led delivery.
- Service with Respect work adds depth to expectations around behaviour.

Shared Themes Across Documents - all documents consistently referenced the following themes:

- Home safety and comfort
- Clear and transparent communication
- Reliable services and trust
- Respect, professionalism, and fairness
- Valuing and acting on customer feedback

We explored these themes to define a positive customer experience, drawing on evidence of behaviours that help customers feel valued.

Using three guiding questions, we pulled together this evidence to shape draft content for a proposed Code of Conduct, which we mocked up into a draft Code to show a clear, evidence-based starting point and to set out initial proposals to guide further work, see **Appendix Three**.

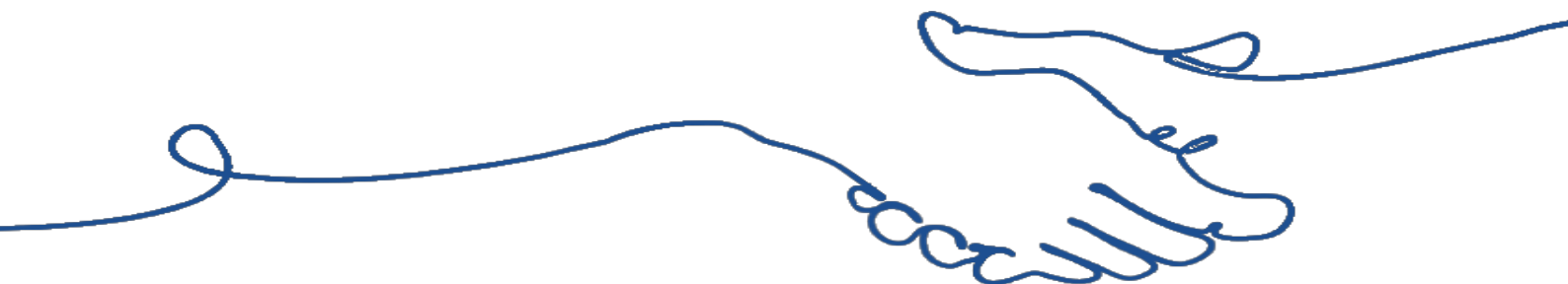
Overall Conclusion

The scrutiny review concludes that a clear, customer-informed, and well-embedded Code of Conduct is essential to delivering consistent, respectful, and quality services. Customer insight demonstrates that trust is strengthened when behaviours align with promises, and lost when they do not.

A single Code of Conduct, grounded in what matters most to customers and reinforced through insight and transparency would provide a shared standard that supports:

- Cultural consistency
- Accountability and learning
- Improved customer experience and trust

Used alongside regular customer feedback and scrutiny, the Code can become a practical tool for continuous improvement, ensuring customers feel valued, supported, and confident in Great Places' services.



Appendix One - Scrutiny Action Plan and Recommendations

Recommendation & Outcome (specific / measurable)	Team Response – action (attainable / relevant)	Lead (relevant)	When timebound
These recommendations set out practical actions to embed a meaningful Code of Conduct across services, improve consistency of customer experience, and ensure learning, fairness and accountability are actively monitored.			
<p>1 Assign ownership of the Code Develop a clear and simple Code of Conduct with customer and colleague input, making sure it reflects real service experiences that matter most, which is easy to understand and is used consistently across services. Assign responsibility for applying it, promote with colleagues, and publish the Code in an accessible format on customer communication channels. Outcome: Customers know what behaviour to expect, and colleagues work to one consistent standard.</p>	Agreed – This work is underway and is part of the Building Professional Excellence Programme of work. We will launch and advertise this in line with the regulatory deadline of October 2026.	Gemma Bradley Rigbye – Director of Business Transformation	October 2026
<p>2 Build the Code into everyday service delivery Embed the Code into day-to-day service delivery and existing ways of working linking it clearly to the Customer Experience strategy four pillars. Clearly link it to policies, standards, complaints, training, induction and performance management, helping colleagues make day-to-day decisions. Outcome: Customer expectations are clear and consistently reflected in everyday ways of working.</p>	Agreed – We will ensure that the Code is reflective of ways of working and that there is clear alignment with relevant strategies, policies and training etc.	Gemma Bradley Rigbye – Director of Business Transformation	October 2026
<p>3 Check how well the Code is being used Introduce clear ways to monitor and measure whether the Code is being used in practice. Use customer feedback, complaints, TSM data and 1-to-1 reviews, adapting as required to ensure data is meaningful, and discuss at 1-to-1 reviews. Outcome: Use of the Code is monitored, evidenced, and applied more consistently.</p>	Agreed – We will ensure that the Code is measurable and we will identify the relevant monitoring mechanisms to enable this.	Rachel Mills – Director of Customer Experience	October 2026 to identify measures



	Recommendation & Outcome (specific / measurable)	Team Response – action	Lead	When
4	<p>Learn from complaints and act on feedback</p> <p>Use complaints and customer feedback more effectively to improve services and build trust. Share learning across services, track repeat issues, and clearly tell customers what has changed because of feedback. Outcome: Customers can see feedback leads to real improvements.</p>	Agreed – We are currently strengthening the way that we learn from complains. We will ensure that learning is regularly communicated to customers and colleagues.	Alison Rigby – Head of Customer Voice	October 2026
5	<p>Check fairness, accessibility, and inclusion</p> <p>Strengthen oversight of how the Code supports fair and accessible services. Review data on access and outcomes for customers with diverse needs and assess customer journeys with a diverse range of users. Outcome: Inclusion and fairness are actively monitored and improved.</p>	Agreed – We will ensure this is built into the monitoring and measurement requirements as per recommendation 3.	Rachel Mills – Director of Customer Experience	October 2026 to identify measures
6	<p>Keep the Code under review</p> <p>Regularly review and update the Code to make sure it remains relevant and effective. Involve customers and customer-facing colleagues in reviews and update training and guidance to reflect learning and new issues. Outcome: The Code remains up to date and continues to meet customer and service needs.</p>	Agreed – We will introduce an annual review of the code and associated training.	Rachel Mills – Director of Customer Experience	October 2027

Appendix Two – Drivers of Complaint Escalation with ‘No Service Failure’ Outcomes

This appendix sets out findings of our scrutiny that aimed to understand why customers may remain dissatisfied and choose to escalate their complaints despite a ‘no service failure’ outcome following investigation.

Appendix Three – Draft Code of Conduct

This appendix brings together our scrutiny findings to inform content for a Code of Conduct and provides a clear, evidence-based starting point setting out initial proposals to guide further work.

