



# Self-Assessment against Adopted Code of Governance for the year 2024/25

## Contents

1. Mission and Values.....	2
2. Strategy and Delivery .....	12
3. Board Effectiveness.....	22
4. Control and assurance.....	43

## 1. Mission and Values (note: “TE” = document on TeamEngine, “W” on Website, “H” on the intranet)

### Principle 1

The board sets and actively drives the organisation’s social purpose, mission, values and ambitions, and through these embeds within the organisation resident focus, inclusion, integrity, openness and accountability.

### Compliance

**1.1 Mission:** the board leads the organisation in pursuit of achieving its social purpose. The board sets the organisation’s mission and values, and regularly reviews and reaffirms their relevance.

Yes ☒ No ☐

Not applicable ☐

#### Comments:

-Board vision, mission, priorities and values are clearly defined and communicated throughout the business

#### Evidence:

- Board (and subsidiary) Terms of Reference (TE)
- Annual Impact Report (W)
- Strategic Plan 2025-29 (W, H)
- Board Meetings away day minutes (TE)
- Rolling Board Agenda (TE)
- Vision, Mission, Priorities & Values - (W, H, TE)
- Governance Framework (TE, W)
- Policies / Procedures (TE, H, W)
- Annual BCHAngemakers company conference;
- Staff performance reviews explicitly reflect business objectives

#### Action needed:

-

#### By whom:

-

#### By date:

-

1.2 Resident Focus: the needs and safety of the organisation’s current and future residents and other customers are placed at the heart of the board’s decision-making.			
(1) There are policies, frameworks and opportunities which enable, encourage and support residents and other customers to engage with, influence and contribute to strategic decision-making.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Customer Engagement Strategy (H, TE, W)</li><li>• Compliments &amp; Complaints policy (W, H, TE)</li><li>• Customer Steering Group and customer engagement governance structure (W)</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> This is an area of on-going focus. Customers contribute to strategic issues and had input to the new 5-year Strategic Plan.		<b>By whom:</b> -
			<b>By date:</b> -
(2) The board has access to insight into the views and needs of the organisation’s residents and other customers (including insight into their concerns and complaints) and uses this to inform decisions where appropriate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Board Terms of Reference (TE)</li><li>• Quarterly Board Report / Performance Pack including i) report on feedback and complaints, ii) Customer Engagement (TE, H), iii) TSMs report</li><li>• Third Party Research (Acuity) and benchmarking report to board (TE, H)</li><li>• Customer Engagement activity evidenced in Quarterly Customer Insight reports (TE, H)</li><li>• 1-1 meetings with customers, House and Service meetings, Reference panels / focus groups (W)</li></ul>	<b>Action needed:</b> Periodic publication of customer insights and projects initiated and concluded as a result
	<b>Comments:</b> The Board regularly receives reports about customer engagement and engages with the Customer Steering Group		<b>By whom:</b> Customer Engagement Manager
			<b>By date:</b> Ongoing

<b>(3)</b> There are policies in place which reflect that the safety of residents and other customers (as well as that of the workforce and the wider public) is an overriding priority, and the board regularly seeks assurance on their operation.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Health and Safety Policy references customer safety (H, TE, W)</li> <li>• Quarterly Board Pack (H, TE)</li> <li>• Internal Audit program (TE)</li> <li>• Board Report minutes and agenda (TE)</li> <li>• Compliance Policies:               <ul style="list-style-type: none"> <li>◦ Health &amp; Safety (TE)</li> <li>◦ Safeguarding (Adults &amp; Children) (TE, W)</li> <li>◦ Data Protection (TE, W)</li> <li>◦ Fire Safety (TE)</li> <li>◦ Raising Serious Concerns (TE, W)</li> </ul> </li> <li>• Mandatory Training for all staff (e.g. Safeguarding, PREVENT)</li> <li>• Mandatory Training for Board (EDI, GDPR, H &amp; S, Safeguarding, Risk Management, Duties and Responsibilities -TE)</li> <li>• Other training for board members (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> Policy commitments to customer and staff safety are well articulated and evidenced in board reporting		<b>By whom:</b> -
<b>(4)</b> The organisation regularly reports to its residents on how its commitments to resident focus have been delivered.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Tenant Talk magazine includes information on Customer Engagement and complaints (W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b>		<b>By whom:</b> -

	<ul style="list-style-type: none"> <li>- This area is developing and is becoming embedded across the organisation</li> </ul>	<ul style="list-style-type: none"> <li>• Customer Reference Panel meets regularly and reviews Board performance reports</li> <li>• Publication of Regulator's TSMs (W)</li> </ul>	<b>By date:</b> <ul style="list-style-type: none"> <li>-</li> </ul>
<b>1.3 Equality, diversity and inclusion:</b> The board demonstrates a clear and active commitment to achieve equality of opportunity, diversity and inclusion in all of the organisation's activities, as well as in its own composition. It has policies and statements which meaningfully demonstrate this commitment, and sets priorities and objectives for the organisation to achieve.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• EDI statement re Board recruitment (TE)</li> <li>• EDI policy (H, TE, W)</li> <li>• Mandatory training</li> <li>• Aids and Adaptations policy (H)</li> <li>• Board composition report (W)</li> <li>• Strategic Plan and People Strategy (H, TE, W)</li> <li>• Board EDI champion</li> </ul>	<b>Action needed:</b> -EDI strategic priorities to be conformed by Board
	<b>Comments:</b> work took place at Board, executive and leadership team level to revise policy and identify priorities for the organisation.		<b>By whom:</b> -Director Transformation
<b>(1)</b> The board seeks regular assurance about how these commitments and objectives are being delivered in practice, and tracks progress against the priorities it has set.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Quarterly Board Reports contain some information about the diversity of staff and customers</li> <li>• Annual Board report on EDI</li> </ul>	<b>Action needed:</b> <ul style="list-style-type: none"> <li>- Review content of performance reports to ensure 2025 customer profiling data captured</li> </ul>
	<b>Comments:</b> -		<b>By whom:</b> - Head of Governance
			<b>By date:</b> - Aug 2025
<b>(2)</b> The organisation annually publishes information about its	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b>	<b>Evidence:</b>	<b>Action needed:</b>

work to deliver these commitments and objectives, and the progress it has made.	Not applicable <input type="checkbox"/>	<ul style="list-style-type: none"><li>Gender Pay Gap Report (H, W)</li><li>Annual Impact Report</li><li>EDI Report</li></ul>	- Publish 2024-25 report
	Comments:  -there is a commitment to ensure that BCHA achieves equality, diversity and inclusion goals		By whom:  -Director Transformation
	By date:  - Sept 2025		
1.4 Culture: The board regularly considers and defines the culture and behaviours that will best enable the organisation to deliver its mission and values.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Vision, Mission, Priorities and Values integral to Strategic Plan (H, TE, W)</li><li>Risk Policy (H, TE)</li><li>Values and Behaviours key element of IPRD staff reviews</li></ul>	Action needed:  -
	Comments:  The board has reviewed and refined these within the new 5-year Strategy. Colleagues, customers and other stakeholders had input to this		By whom:  -
	By date:  -		
(1) The board leads by example and promotes the culture of the organisation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Annual BCHAangemakers event and awards (board participates in judging)</li><li>Customers engage with the Board at away days</li><li>Communications, social media, website</li><li>Performance reports (H, TE)</li></ul>	Action needed:  -
	Comments:  -		By whom:  -
	By date:  -		
(2) The board seeks regular assurance that its desired culture	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence:	Action needed:

and behaviours are being enacted in practice in alignment with its mission and values.	<b>Not applicable</b> <input type="checkbox"/>	<ul style="list-style-type: none"> <li>Quarterly Board Performance Pack including third party research (H, TE)</li> <li>ART Committee reviews serious concerns and cultural matters (TE)</li> <li>Internal Audit Plan &amp; Internal Audit Charter (TE)</li> <li>Board visits to services (TE)</li> </ul>	-
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>1.5 Integrity:</b> the board, its members and the organisation maintain high standards of probity and conduct.			
(1) The board adopts a formal code of conduct to which all its members adhere.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board Code of Conduct (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) The board has clear policies and procedures for its members to identify, declare, record and manage any actual, potential and perceived conflicts of interest.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Payments, Benefits, Interests Policy and Procedure (H)</li> <li>Standing Item Board Agendas (TE) &amp; subsequent minutes</li> <li>Declaration of Interest register (on appointment and annually)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

<b>(3)</b> There is a publicly available register for board and committee member declarations of interest which is reported on annually to the board.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Annual Report (W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
	<b>By date:</b> -		
<b>(4)</b> Where there is a material conflict of interest, any individual concerned withdraws from the board's discussions and decisions on relevant matters.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE)</li> <li>Meeting agendas and minutes (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
	<b>By date:</b> -		
<b>(5)</b> In the case of a fundamental or ongoing material conflict, the board determines whether the person concerned should cease to be a board member.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
	<b>By date:</b> -		
<b>1.6: Accountability:</b> The board operates openly and transparently, and demonstrates accountability to key stakeholders including residents, other customers, and partner statutory bodies.			

(1) The board publishes information annually about the organisation’s activities, performance and plans for future improvements, which is accessible to its key stakeholders and covers the matters referred to in this code.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• Annual Impact Report (W)</li><li>• Financial Statements (W)</li><li>• Strategic Plan (W)</li><li>• Annual Governance Statement (W)</li><li>• Value for Money Report (W)</li><li>• Customer Engagement activity (W)</li></ul>	Action needed: -
	Comments: -		By whom: -
	By date: -		
(2) The organisation systematically identifies and regularly communicates with its key stakeholders and receives feedback about their views. In doing so it has regard to the communication needs of the diverse groups and communities it serves.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• Stakeholder Map (TE)</li><li>• Website</li><li>• Tenant Talk (W)</li><li>• Business Plan Updates AGM</li><li>• Customer Steering Group engagement</li><li>• Communications Strategy (H)</li><li>• Attendance at LA forums</li><li>• Regulator engagement</li></ul>	Action needed: -
	Comments: -		By whom: -
	By date: -		
(3) Opportunities and information are provided for residents and other customers independently to scrutinise the work of the organisation and to hold it to account, and the board reviews these arrangements regularly to ensure that they remain fit for purpose.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• Board Terms of Reference (TE)</li><li>• Customer input to Board away days</li><li>• Customer Steering Group (W)</li><li>• Focus Groups (W)</li><li>• Customer Insight reports (TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
	By date: -		

(4) The organisation publishes clear and up-to-date information about its board members, committees and governance.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Board of Trustees page (W)</li><li>• Statement of Board Appointment and Composition (W)</li><li>• Shareholding Policy (W)</li><li>• Governance Structure</li><li>• BCHA Constitution (W)</li><li>• Annual Governance Statement (W)</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
	<b>By date:</b> -		
(5) The organisation responds in a considered, open and transparent way to requests for information about its work, activities, and decisions made by the board; where it cannot provide certain information, it gives clear reasons as to why this is the case.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Request for Information Policy (H)</li><li>• Published information on website pre-empts some requests (W)</li></ul>	<b>Action needed:</b> Annual report on Board resolutions
	<b>Comments:</b> Organisation responds openly although recognises there is an intent by the Regulator to introduce a Publication Scheme for HA's akin to the Freedom of Information Act.		<b>By whom:</b> Company Secretary
	<b>By date:</b> Dec 2025		
(6) The role of shareholders in the governance of the organisation is documented and understood.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Shareholders area (W)</li><li>• Shareholding Membership Policy (W)</li><li>• BCHA Rules (W)</li><li>• Governance Framework (TE)</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
	<b>By date:</b> -		

(7) Organisations with open shareholding publish their policy for the admission of shareholders.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Shareholding Membership Policy (W)</li><li>BCHA Rules Part C (W, TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
1.7 Reputation and Trust: The board takes into account in its actions and decisions the importance of maintaining trust in the organisation and upholding its reputation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>BCHA Rules (W)</li><li>Board Terms of Reference (TE)</li><li>Quarterly Risk Review (TE)</li><li>Quarterly Report on Serious Concerns (TE)</li><li>Board reporting template includes scope for considering reputational risk</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -

## 2. Strategy and Delivery

### Principle 2

The board sets ambitions, plans and strategies which enable the organisation to fulfil its social purpose and remain viable and sustainable, and exercises demonstrable and effective oversight of its delivery.

### Compliance

**2.1 Strategy, resources and plans:** The board sets the organisation's overall direction and strategy in line with its charitable, community benefit or other constitutional purposes.

(1) The board sets financially sustainable plans to ensure that the organisation has the resources it needs to deliver its strategy.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>Board Terms of Reference (W, TE, H)</li><li>Annual Budget and Financial Plan (TE)</li><li>Board Financial Performance Group</li><li>Audit, Risk, Treasury committee</li><li>Financial Regulations (TE, H)</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) The board gives specific consideration in setting such plans to value for money, financial sustainability, carbon neutrality and environmental	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>Value for Money (VFM) Strategy (H, TE)</li><li>Board agendas and minutes (TE)</li><li>Strategic Plan goals (W, H, TE)</li></ul>	<b>Action needed:</b> -Continue to develop ESG reporting framework
	<b>Comments:</b>		<b>By whom:</b> -Board and executive team

sustainability, and social sustainability.	-Environmental and Social Sustainability continues to be developed	<ul style="list-style-type: none"> <li>Asset Management and Development strategies (TE)</li> </ul>	<b>By date:</b> -Oct 2025
<b>2.2 Structures:</b> Organisational and governance structures support the delivery of the organisation's social purpose and strategic objectives.			
(1) Structures are designed to support effective delivery and oversight of strategy, are clearly set out, and are regularly reviewed to ensure they remain fit for purpose.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board and committee structure (TE)</li> <li>Organisational management structure (W, H, TE)</li> <li>Subsidiary structure</li> </ul>	<b>Action needed:</b> Wider review of Committee structure and scope
	<b>Comments:</b> -		<b>By whom:</b> Chair and CEO
			<b>By date:</b> Dec 2025
(2) The board considers regularly whether the organisation's purpose could be better achieved through changes to its group, governance or staffing structures.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Annual subsidiary review (TE)</li> <li>Board away days – approach to mergers (TE)</li> <li>Organisational Leadership review 2024</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>2.3 Working with others:</b> Within the organisation's overall corporate strategy (or associated	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>5-year Strategy Plan (TE, H, W)</li> </ul>	<b>Action needed:</b> -

strategies and plans) there is consideration given to whether and how active cooperation, collaboration, joint working or formal partnership with other organisations could enable it to deliver its social purpose and strategies more effectively and economically.	<b>Comments:</b> -	<ul style="list-style-type: none"> <li>• Annual Impact Report (H, W)</li> <li>• Wayfarer Consortium</li> <li>• Plymouth Alliance</li> <li>• Membership of NHF and Homelesslink</li> <li>• Collaborative bids such as Access Wellbeing mental health provision (Dorset)</li> </ul>	<b>By whom:</b> - <b>By date:</b> -
<b>2.4 The chief executive:</b> The organisation has a chief executive, or equivalent, with the delegated authority to oversee and manage operational delivery of the strategies set by the board.			
(1) The responsibilities of, and delegations to, the chief executive are clearly set out.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• CEO JD</li> <li>• Financial Regulations</li> <li>• Delegated authority statement</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) The chief executive has a formal contract of employment; this and the remuneration under it are reviewed regularly, with independent advice as required.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• CEO Contract and Job description</li> </ul>	<b>Action needed:</b> Review of remuneration
	<b>Comments:</b> -		<b>By whom:</b> Chair & GC Chair
			<b>By date:</b> Dec 2025

<b>(3)</b> The chief executive's remuneration package is set at a level which is proportionate to the organisation's size, complexity, level of risk, and resources; it is also aligned with the organisation's social purpose and wider reputation.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board review of remuneration at last recruitment 2022 with input from Recruitment Consultant</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(4)</b> If the chief executive's contract is to be terminated, any extra-contractual severance payments or benefits are approved by the board with the reasons, costs and any reputational risks clearly minuted.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Payments, Benefits &amp; Interests (PB&amp;I) policy (H, TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(5)</b> There is a formal process for the chief executive's annual appraisal, overseen by the board or an appropriate committee.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, H)</li> <li>CEO Appraisal Process (TE, H)</li> <li>Governance Committee ToR 5.3.7 (TE)</li> <li>Governance committee minutes once completed</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

2.5 Workforce: The board ensures that its workforce policies and practices support the success of the organisation and reflect its values and its commitments to equality, diversity and inclusion.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• Policies (H, W, TE)</li><li>• Induction of staff on joining including mandatory e-learning and classroom training</li><li>• Corporate Induction</li></ul>	Action needed: -
	Comments: -		By whom: -
	By date: -		
(1) The board has access to insight into the views of staff, such that their opinions and needs are understood, and influence the board’s decisions as appropriate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• Board attendance at BCHAngemakers – BCHA’s annual conference</li><li>• Board visits to services</li><li>• Board Champions</li><li>• People reports to Board and ART committee (inc progress on Peoples Strategy)</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The board determines a strategy for remuneration of the workforce which is aligned to the organisation’s size and complexity, and to its purpose and values.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• Board considers cost of living envelope at each Budget approval</li><li>• Board approved People Strategy including reference to remuneration</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) The board has policies on the safety and wellbeing of its	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• H &amp; S Policy (TE, H)</li></ul>	Action needed: -

workforce and reviews their effectiveness.	<b>Comments:</b> -	<ul style="list-style-type: none"> <li>Quarterly Board operations report (H, TE)</li> <li>All staff have access to independent support 24/7 through CareFirst</li> <li>Colleague well-being survey published September 2023</li> <li>Oversight of Audit, Risk and Treasury Committee in workforce matters, inc culture (TE)</li> </ul>	<b>By whom:</b> - <b>By date:</b> -
<b>2.6 Performance:</b> The board has demonstrable oversight of the organisation's performance.			
(1) The board exercises active and regular oversight of delivery of strategies and plans. This includes scrutinising key operational and financial performance information, and information concerning resident insights and satisfaction.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Strategic Plan (H, W, TE)</li> <li>Finance Plan (TE)</li> <li>KPIs (H, TE)</li> <li>Board and Committee Terms of Reference (TE)</li> <li>Board and Committee Rolling Agendas and Minutes (TE)</li> <li>Reports to Board (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) The board has assurance that the reports it receives provide an accurate picture of performance.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Internal Audit through Beever and Struthers</li> <li>Other advice – such as Treasury consultancy</li> <li>External Auditor review of accounts</li> <li>Sub-committee, review Group or Task &amp; Finish Group scrutiny (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

<b>2.7 Group Structures:</b> Organisations with subsidiaries ensure that these entities support and enhance delivery of the group parent's mission.			
(1) Where the group parent is not a registered provider, formal arrangements are in place to ensure that any registered provider subsidiaries remain compliant with their own charitable or community benefit purposes, and with regulatory requirements.	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>NOT APPLICABLE</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) Where a subsidiary is to be or has been established, the benefits, risks, and relationship with the parent organisation are reviewed by the board of the parent beforehand and thereafter regularly.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Annual Review by Board (TE)</li> <li>Subsidiary Chairs' Reports to Board - standing item at Board meetings (TE)</li> <li>Consideration of single items (such as Recoop demerger Aug 2024) as required</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(3) The board of a parent organisation in a group structure has the responsibility and the reserve powers to direct, and if necessary, intervene in the governance of its subsidiaries.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>BCHA Rules / constitution (W, TE)</li> <li>BCHA Board Terms of Reference (TE)</li> <li>Financial Regulations (TE, H)</li> <li>Governance Framework (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

(4) The constitutional relationship and arrangements between the parent and each subsidiary including how oversight and control will be exercised, are formally documented.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• BCHA Rules (W, TE)</li> <li>• Governance Framework (TE, W)</li> <li>• Subsidiary Articles and Terms of Reference (TE)</li> <li>• Governance Reviews (TE)</li> <li>• Service Level Agreements</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
(5) The board of the parent approves the group's plans and budgets and holds the board of each subsidiary accountable for the delivery of its objectives.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Documented within formal budget process (TE)</li> <li>• Reports to Board at Quarterly meetings - minutes (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
(6) The board of the parent considers and determines whether and how this code should apply to each of its subsidiaries.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• STFH has adopted the Code and must report compliance annually</li> <li>• New Leaf Company is dormant and exempted from the Code</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
			<b>By date:</b> -

<b>(7)</b> Where, within a group, there are people who serve on more than one board, there is guidance and documentation to set out how board members must deal with their overlapping responsibilities and any resulting conflicts of interest.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(8)</b> Where there is, within a group, a single or common board which governs more than one organisation, the organisation has documented how its meetings will be conducted, serviced and minuted.	<b>Yes <input type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input checked="" type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>NOT APPLICABLE</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>2.8 Joint ventures and partnerships:</b> Organisations that set up joint ventures or partnership vehicles with external counterparties ensure that these are in support of their mission and objectives.	<b>Yes <input type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input checked="" type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>NOT APPLICABLE</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

(1) There are formal documented arrangements concerning the accountability, performance, compliance, risk management and governance of such entities.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>NOT APPLICABLE</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) The benefits and risks of such entities are reviewed annually.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>NOT APPLICABLE</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

### 3. Board Effectiveness

#### Principle 3

The organisation is led by a skilled and diverse board which regularly reviews and capably manages its own performance and effectiveness, and ensures that it complies with this code.

#### Compliance

##### 3.1 Roles and responsibilities:

The statutory and governance roles and responsibilities of the board, of its individual members, office holders and of others who work to the board are clearly set out.

Yes ☒ No ☐

Not applicable ☐

Comments:

-

##### Evidence:

- BCHA Rules (TE, W)
- Board (W, TE) and Committee Terms of Reference (TE)
- Job Descriptions – Chairs, Board Members, Champions and Company Secretary, (TE)
- Job Descriptions CEO and Directors

##### Action needed:

-

By whom:

-

By date:

-

(1) The board elects or appoints a chair with appropriate skills to be responsible for leading the board and ensuring its effectiveness.

Yes ☒ No ☐

Not applicable ☐

Comments:

-

##### Evidence:

- Process for appointing Chair in Governance framework (TE, W)
- Appointment of chair and Vice Chair annually (TE)
- Skills matrix (TE)

##### Action needed:

-

By whom:

-

By date:

-

(2) The chair of the board does not chair and is not a member of the committee responsible for

Yes ☒ No ☐

Not applicable ☐

##### Evidence:

- ART Terms Of Reference (TE)

##### Action needed:

-

audit, nor does the chair of the board chair the committee responsible for remuneration.	<b>Comments:</b> -		<b>By whom:</b> -
<b>(3)</b> Where there are executive board members, the board formally records and publishes policies about the role they play on the board and committees, and makes clear those matters for which they must leave the meeting, or not participate in debate or decision making.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
	<b>By date:</b> -		
<b>(4)</b> The roles of chair of the board and standing committees (and those of vice-chair or senior independent director as applicable) are not held by an executive.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
	<b>By date:</b> -		

<b>(5)</b> Executives are not members of the committees responsible for nominations, remuneration or audit.	Yes <input type="checkbox"/> No <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Executives are not members of these committees</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(6)</b> There is a clear, documented framework setting out delegations to staff, committees and subsidiaries.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>BCHA Rules D29 - D33</li> <li>Board terms of Reference 4.4 (TE)</li> <li>Committee Terms of Reference (TE)</li> <li>Subsidiary Board ToR (TE)</li> <li>Financial Regulations (W, TE)</li> <li>Governance Framework (TE)</li> <li>PBI Policy (H)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>3.2 Functions of the board:</b> there is a record of the essential functions and other matters which are reserved for board decision and cannot be delegated. In addition to matters set out in law, statute, regulations and in the organisation's constitution these include as a minimum:			
<b>(1)</b> Setting and ensuring compliance with the values, vision, mission and strategic objectives of the organisation, ensuring its long-term success.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board Terms of Reference (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

(2) Establishing a culture that is positive, focused on the needs of current and future residents, other customers and other key stakeholders, and embeds equality, diversity and inclusion in the organisation.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board Terms of Reference (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(3) Ensuring the organisation operates effectively, efficiently and economically.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board ToR (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(4) Providing oversight, support, direction and constructive challenge to the organisation's chief executive and other executives.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board TOR (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(5) Appointing and, if necessary, dismissing the chief executive.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board ToR (TE)</li> </ul>	<b>Action needed:</b> -

	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(6)</b> Satisfying itself as to the integrity of financial information, and setting and approving each year's budget, business plan and annual accounts prior to publication.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> • Board ToR (TE)	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(7)</b> Establishing, overseeing and regularly reviewing a framework of delegations to committees and staff.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> • Board ToR (TE)	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(8)</b> Establishing and overseeing control and risk management frameworks in order to safeguard	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> • Board ToR (TE)	<b>Action needed:</b> -
	<b>Comments:</b>		<b>By whom:</b>

the assets, compliance and reputation of the organisation.	-		-
			<b>By date:</b> -
(9) Holding to account the organisation's subsidiary boards, committees and senior staff for the exercise of any powers delegated to them.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board ToR (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>3.3 Board composition:</b> board members have the attributes and time needed to govern effectively, and each member exercises independent judgement in doing so.			
(1) The organisation determines, documents and regularly reviews the board composition best suited to its needs; in the case of a group subsidiary, this may be a matter for the group parent.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE)</li> <li>Annual review by Governance Committee (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) The board has between five and 12 members, including any co-optees and executive members.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>BCHA Rules (TE, W)</li> <li>Governance Framework (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b>		<b>By whom:</b>

	-		-
			By date: -
(3) Executive board members, if appointed, are in a minority on the board and in the quorum for a board meeting.	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>NOT APPLICABLE</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
(4) There is a dedicated senior board member (normally a vice-chair or senior independent director) with duties that include appraisal of the chair and assisting the chair to ensure the effectiveness of the board.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Vice Chair (and Chair) job Description (TE)</li><li>Governance Committee chair leads on Chair appraisal (Governance Framework)</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
3.4 Board election, selection and appointment: the board has a diverse membership with the collective skills and attributes needed to govern effectively.			
(1) The board understands, states and regularly reviews the	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence:	Action needed: -

collective skills and attributes it requires to be effective.	<b>Comments:</b> -	<ul style="list-style-type: none"> <li>Skills Matrix (TE) reviewed by Governance Committee (and Board May 2025)</li> <li>Governance Framework (TE)</li> </ul>	<b>By whom:</b> -
<b>(2)</b> Prospective board and committee members undergo an open and merit based assessment process to establish their suitability. Where the organisation's constitution provides for one or more board members to be nominated by an external body, or directly elected, the organisation ensures that those coming forward have the necessary attributes and qualities, and that they are aware of the responsibilities of the role, including those of exercising independent judgement.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE)</li> <li>Interview notes for Board recruitment</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> Church nominations to the BCHA Board ended May 2025 by Special resolution to amend those provisions in the constitution		<b>By whom:</b> -
			<b>By date:</b> -
<b>(3)</b> The membership of board and committees comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities the organisation serves and in	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>EDI policy (TE, W, H)</li> <li>Governance Framework</li> <li>Pen portraits (W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

line with the organisation's stated commitments to equality, diversity and inclusion.		<ul style="list-style-type: none"> <li>Annual Statement of Board Appointments and Composition (W)</li> <li>Register of board members</li> </ul>	<b>By date:</b> -
(4) People with direct lived experience of (or particular insight into) the communities served by the organisation are meaningfully engaged in governance structures.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> <li>Recruitment Process</li> <li>Annual Board Appointment and Composition Statement (W)</li> <li>Customer Steering Group participates in Board away days</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(5) Shareholders who are not board members are supported and informed to play their proper constitutional role in the organisation's governance and in particular in the election of board members.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Shareholder Membership Policy (W)</li> <li>Rules (Constitution) of BCHA (W)</li> <li>AGM notices, agenda and minutes (W)</li> <li>Shareholding page on website (W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(6) The organisation annually publishes information about the appointment of new board members, and about the diversity, skills and attributes of all the board members.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board area on website (W)</li> <li>Annual Board Appointment and Composition Statement (W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

			<b>By date:</b> -
<b>3.5 Committees:</b> committees are established where the board determines that they will enable it to exercise more effective scrutiny, control or oversight of particular areas of the organisation's activity.			
<b>(1)</b> Each committee has formally recorded terms of reference approved by the board, and reports regularly to the board on its work and the exercise of any delegated authority.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Committee ToR (TE)</li> <li>Committee chairs report to Board each quarter inc decisions taken or escalated</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(2)</b> The membership of committees is determined on the basis of the skills, attributes and diverse characteristics which the board determines are appropriate.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Annual Review of Committee Membership by Governance Committee (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
<b>3.6 Board Remuneration:</b> organisations paying non-executive board members have an objective mechanism for setting payment levels. This will normally be the responsibility of a committee responsible for remuneration, using independent advice. Such payment is:			
<b>(1)</b> Permitted by law and by the organisation's own constitution.	<b>Yes <input type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input checked="" type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>NOT APPLICABLE</li> </ul>	<b>Action needed:</b> -

	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(2) Agreed by the board as being in the best interests of the organisation.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(3) Aligned with the organisation's social purpose and wider reputation.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(4) Proportionate to the organisation's size, complexity, level of risk and resources.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

			<b>By date:</b> -
<b>(5)</b> Linked to the role's responsibilities, against which performance is reviewed.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(6)</b> Regularly reviewed, drawing on external advice as necessary.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(7)</b> Disclosed in the organisation's annual financial statements.	<b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input checked="" type="checkbox"/>	<b>Evidence:</b> • NOT APPLICABLE	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

			<b>By date:</b> -
<b>3.7 Tenure and renewal:</b> tenure for non-executive board members (and independent committee members) complies with the organisation's constitution and is managed so as to enable the organisation to achieve an appropriately skilled, diverse and independent board membership.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• BCHA Rules (TE, W)</li> <li>• Governance Framework (TE,W)</li> <li>• Service agreements</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> None		<b>By whom:</b> -
			<b>By date:</b> -
<b>(1)</b> The board has a strategy for its own renewal which is based on an agreed statement of the skills, qualifications, diversity and other attributes required.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Board ToR (W, TE)</li> <li>• Governance Committee ToR (TE)</li> <li>• Reports to Board and Governance committee on succession and recruitment (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(2)</b> Where a member is at the end of a term of office and is eligible for reappointment, this is subject to considering the member's performance and skills, and the needs of the board.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Governance Framework (TE, W)</li> <li>• Board member appraisals conducted every 2 years by Chair</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

(3) Maximum tenure will normally be up to six consecutive years (typically comprising two terms of office), but where a member has served six years, and the board agrees that it is in the organisation’s best interests, their tenure may be extended up to a maximum of nine years.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Governance Framework (W, TE)</li><li>BCHA Rules currently reflect maximum 9-year terms as per NHF model (W, TE)</li><li>Board member register records date of appointment and term served to data</li></ul>	Action needed: -
	Comments: BCHA does not currently have board members serving a third term		By whom: -
			By date: -
(4) A member who has left the board is not re-appointed for at least three years.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Governance Framework (TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
(5) These provisions concerning tenure apply to office held across all of the organisation’s boards and committees, and those of predecessor organisations, including service as a co-optee.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Subsidiaries have also adopted 2020 Code of Governance</li><li>Governance Frameworks for BCHA and subsidiaries (TE, W)</li></ul>	Action needed: -
	Comments:		By whom: -
			By date: -
3.8 Conduct of business: the board and its committees conduct their business efficiently, and on the basis of an appropriate level and quality of information.			

(1) The board has appointed (and is responsible for the removal of) a company secretary who is accessible to all board and committee members and accountable to the board for advising on governance matters.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Company Secretary JD and Delegated Authority</li><li>BCHA Rules E7 (W, TE)</li><li>Governance Framework (TE, W)</li></ul>	Action needed: -
	Comments: -		By whom: -
	By date: -		
(2) Board and committee meetings are quorate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Board and Committee Terms of Reference (W, TE)</li><li>Governance Framework (TE, W)</li><li>Minutes of all meetings (TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
	By date: -		
(3) Scheduled board and committee meetings are based on agendas and documents circulated well in advance. Decisions and the main reasons for them are recorded in the minutes.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Governance Framework (TE, W)</li><li>Agendas and minutes (TE)</li><li>Rolling Agendas</li></ul>	Action needed: -
	Comments: -		By whom: -
	By date: -		
(4) Urgent decisions between board meetings are taken in accordance with predetermined	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Governance Framework (TE, W)</li></ul>	Action needed: -

and formally recorded arrangements.	<b>Comments:</b> -	<ul style="list-style-type: none"> <li>Board Terms of Reference (TE, W)</li> <li>BCHA Rules D27, D28 (W, TE)</li> </ul>	<b>By whom:</b> -
			<b>By date:</b> -
(5) Meetings are fully inclusive and accessible, with adjustments made as necessary so that all members are able to attend and participate.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> <li>Minutes of Teams meetings (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(6) Where meetings are conducted remotely, arrangements are made and support provided so that all members can fully participate and contribute.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(7) There is a policy and procedure setting out how disputes and grievances involving members of the board	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b>		<b>By whom:</b>

can be raised, and how they are responded to.	-		-  <b>By date:</b> -
<b>3.9 Board performance, review and learning:</b> the board reviews and seeks to improve its performance.			
<p><b>(1)</b> All boards and committees consider their effectiveness annually and assess how they conduct their business, including:</p> <p>(a) Composition, skills, experience and diversity.</p> <p>(b) Effectiveness in role-modelling the desired culture, values and behaviours of the organisation.</p> <p>(c) Governing instruments, delegations, regulations, standing orders, structures, systems and other formal documentation as referred to in this code.</p> <p>(d) Timing and frequency of meetings.</p> <p>(e) Format of agendas, quality and scope of papers, minutes and communications.</p> <p>(f) Effectiveness of decision-making, including how the views and needs of key stakeholders, including residents and other</p>	<div style="background-color: #90EE90; padding: 5px;"> <b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b>  <b>Not applicable <input type="checkbox"/></b> </div> <p><b>Comments:</b></p> <p>-</p>	<p><b>Evidence:</b></p> <ul style="list-style-type: none"> <li>• Annual review calendar (TE)</li> <li>• Rolling agendas (TE)</li> <li>• Minutes from meetings (TE)</li> <li>• Annual Committee ToR reviews (TE)</li> <li>• Governance Committee annual review of committee composition (TE)</li> <li>• Board Member Appraisal (every 2 years)</li> <li>• Governance committee annual review of legal, regulatory and governance compliance and review of governance processes (TE)</li> </ul>	<p><b>Action needed:</b></p> <p>-</p> <p><b>By whom:</b></p> <p>-</p> <p><b>By date:</b></p> <p>-</p>

customers, have informed decisions. (g) Compliance with this code and legal duties.			
(2) These matters are regularly and formally reviewed.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Agendas and minutes (TE)</li> <li>Rolling agendas</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(3) All new board and committee members receive a full induction.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> <li>Formal Induction with checklist (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
(4) All members have an agreed programme of ongoing learning and development opportunities. This includes addressing any needs identified through the appraisal process.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Board Annual Training Plan (TE)</li> <li>Scheme visits</li> <li>Appraisals (every 2 years) capture actions for development and training</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

			<b>By date:</b> -
<b>3.10 Member appraisal:</b> a full, rigorous and documented appraisal process for the individual members of the board and its committees, including the chairs, is carried out at least every two years.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Governance Framework (TE, W)</li><li>• Appraisals every 2 years</li><li>• Chair of committees' role description (TE)</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> None		<b>By whom:</b> -
			<b>By date:</b> -
<b>(1)</b> The appraisal of the board's chair is led by a senior board member, informed by the views of all board members.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Governance Framework (TE, W)</li><li>• 360 degree Appraisal Process led by Governance Committee chair every 2 years (latest Dec 2024)</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(2)</b> There is an appropriate process for responding to under-performance by individual board members, and to any conduct which may breach policies or codes.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>• Governance Framework 7.2, 7.6.2 (TE)</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

			<b>By date:</b> -
<b>3.11 Compliance with this code:</b> a compliance statement is published with the annual report, with an explanation given for any non-compliance.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Annual Report in Financial Statements (W, H, TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(1)</b> Where the formal constitution of an organisation conflicts with the code, the constitution takes precedence.	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(2)</b> Where a statement of non-compliance is needed it sets out: <b>(a)</b> The reasons for non-compliance, and an explanation	<b>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>As applicable</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

of how the relevant principle in this code is being upheld. <b>(b)</b> Summary plans for the achievement of compliance, if applicable.			<b>By date:</b> -
<b>(3)</b> Where an organisation has subsidiaries which have not adopted this code, the reasons for this are given.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>New Leaf exempted because the company is dormant</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(4)</b> All policies, documents and statements referred to in this code are formally recorded as appropriate and are regularly reviewed.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"><li>All documents have effective from date and next review date (TE)</li><li>Schedule of Code of Governance documentation monitored and updated as necessary</li></ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

## 4. Control and assurance

### Principal 4

The board actively manages the risks faced by the organisation, and obtains robust assurance that controls are effective, that plans and compliance obligations are being delivered, and that the organisation is financially viable.

### Compliance

**4.1 Audit:** the board has formal and transparent arrangements ensuring that the organisation is financially viable and maintains both a sound system of internal audit and controls and an appropriate relationship with its external auditors.

(1) The board can have confidence in the information it receives and there are robust internal controls and systems for business and control assurance in place which are reviewed annually.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence <ul style="list-style-type: none"><li>• Beever and Struthers Internal Audit Plan and Internal Audit Charter (TE)</li><li>• ART Committee ToR (TE)</li><li>• ART Annual Internal Controls Assurance Report (TE)</li><li>• Internal and External auditor reports</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) There is a committee primarily responsible for audit, and there are arrangements for effective internal control assurance and audit functions.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>• ART ToR (TE)</li><li>• Governance Framework (TE, W)</li><li>• Financial Regulations</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -

<b>(3)</b> The organisation's external auditors are independent and effective, and their appointment is reviewed at least every six years.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Financial Regulations (TE, H)</li> <li>ART ToR - External Auditors including appointment process- review every 5 years (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>4.2 Audit committee:</b> a committee exercises independent scrutiny and challenge to provide the board with assurance.			
<b>(1)</b> The committee responsible for audit meets regularly and its minutes are available to the board.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Committee Agendas and Minutes (TE)</li> <li>Committee ToR (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -
<b>(2)</b> The committee exercises oversight of the internal and external audit functions.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>ART ToR (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
			<b>By date:</b> -

(3) The committee annually meets with the <b>external</b> auditors with only non-executives present.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>ART ToR (TE)</li><li>Minutes of committee meeting (TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
(4) The chair of the committee is a member of the board and regularly reports to it.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>ART ToR (TE)</li><li>Quarterly Chair Report to Board - standing agenda item (TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -
(5) The membership of the committee includes at least one person with recent and relevant financial experience, proportionate to the size and complexity of the organisation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Committee Membership log</li></ul>	Action needed: -
	Comments: -		By whom: -
			By date: -

<b>4.3 Risk:</b> the board retains ultimate responsibility for risk management and ensures that appropriate risk management arrangements are in place.			
(1) The board may delegate the detailed scrutiny and evaluation of risk to a committee.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>ART ToR (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
(2) The board has a suitable risk management framework in place; it understands the organisation's risk profile and the effectiveness of key controls.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Risk Management Policy (H)</li> <li>BCHA Risk Appetite Assessment (TE)</li> <li>Sector Risk Profile (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
(3) The board establishes and documents its appetite for the risks the organisation faces in pursuit of its strategy.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Risk Management Policy (H, TE)</li> <li>BCHA Risk Appetite Assessment (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
(4) The board ensures that the organisation is resilient to the risks it may face, with appropriate mitigations and a suitably comprehensive, tested and up-to-date business continuity plan.	<b>Yes <input checked="" type="checkbox"/></b> <b>No <input type="checkbox"/></b> <b>Not applicable <input type="checkbox"/></b>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Business Continuity Plan is available - including business continuity insurance</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

(5) The board includes members with skills and experience appropriate to the level and type of risks faced by the organisation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Skills Audit and reports to Governance Committee</li></ul>	Action needed: -
	Comments: -		By whom: -
(6) The board regularly reviews the risks the organisation faces and how they are being managed; this includes the risks associated with activities carried out by subsidiaries or partnership vehicles.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Quarterly Reports to the board from subsidiaries (TE) using report template</li><li>ART Quarterly Strategic risk Report (including Risk Register) and subsequent Quarterly report to Board (TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
(7) The board regularly participates in stress-testing its plans, to identify the risks (or combination of risks) that may pose a material threat to the viability of the business and ensure that appropriate mitigations are in place.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Financial Plan including stress testing (TE)</li></ul>	Action needed: -
	Comments: -		By whom: -
(8) The organisation’s annual report includes a statement about the risk management work of the board, including its understanding of principal and emerging risks and how these are being managed or mitigated.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"><li>Director's Report - Financial Statements (W)</li></ul>	Action needed: -
	Comments: -		By whom: -
4.4 Compliance: in line with its mission and values, the board retains ultimate responsibility for the organisation’s compliance with all legal, statutory, regulatory and constitutional requirements.			

<b>(1)</b> The board has a robust internal control framework and has regular assurance about the effectiveness of key controls including controls to ensure compliance.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Beever &amp; Struthers Internal Audit Plan and reports</li> <li>• Other consultancy reports or external regulatory reports from time to time (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
<b>(2)</b> The board has regular assurance about compliance, including those requirements relating to the health and safety of residents, other customers and employees, and to safeguarding.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Internal Audit Reports</li> <li>• Quarterly Board Performance reports inc safety matters (TE)</li> <li>• Safeguarding report to Governance Committee, 6-monthly (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
<b>(3)</b> The board publishes an annual statement setting out its approach to compliance and internal control.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Financial Statements (W, H)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
<b>4.5 Whistleblowing and confidential concerns:</b> there are clear and well-publicised arrangements for members of staff and others associated with the organisation to raise confidential concerns with a designated nonexecutive member of the board (other than the chair), where these are serious concerns and cannot appropriately be raised through the usual channels, and for these to be dealt with through proportionate and independent investigation as necessary.			
<b>(1)</b> The board ensures that appropriate whistleblowing policies and procedures are in place.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>• Raising Serious Concerns Policy (W, H, TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

(2) The board (or an appropriate committee) regularly receives an account of matters raised under these policies, and actions taken in response.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>ART Committee ToR (TE)</li> <li>Quarterly serious concerns report for ART Committee (TE)</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -
(3) If a board member has concerns about the board or the organisation that cannot be resolved, these concerns are shared with the board and formally recorded.	<b>Yes</b> <input checked="" type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>Not applicable</b> <input type="checkbox"/>	<b>Evidence:</b> <ul style="list-style-type: none"> <li>Governance Framework (TE, W)</li> <li>Service Agreements</li> </ul>	<b>Action needed:</b> -
	<b>Comments:</b> -		<b>By whom:</b> -

'Adopted Code of Governance' refers to the  
National Housing Federation Code of Governance for Housing Association 2020  
For details visit: [https://www.housing.org.uk/nhf\\_catalog/publications/code-of-governance-2020/](https://www.housing.org.uk/nhf_catalog/publications/code-of-governance-2020/)

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