



Self-Assessment against Adopted Code of Governance for the year 2025/26

Contents

1. Mission and Values.....	2
2. Strategy and Delivery	16
3. Board Effectiveness.....	27
4. Control and assurance.....	49

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 ☐	Evidence:	Action needed:
	Comments: -Board vision, mission, priorities and values are clearly defined and communicated throughout the business	•Board 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	-
			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 ☒ No ☐ Not applicable ☐	Evidence: • Customer Engagement Strategy (H, TE, W) • Compliments & Complaints policy (W, H, TE) • Customer Steering Group and customer engagement governance structure (W) • RSH C1 Action Plan	Action needed: -
	Comments: This is an area of on-going focus, contributing to the RSH C1 Action Plan. Customers contribute to strategic issues and had input to the new 5-year Strategic Plan.		By whom: - By date: -
(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 ☒ No ☐ Not applicable ☐	Evidence: • Board Terms of Reference (TE) • Quarterly Board Report / Performance Pack including i) report on feedback and complaints, ii) Customer Engagement (TE, H), iii)	Action needed: Delivery of the C1 Regulator Improvement Plan, including through developing an evidenced customer scrutiny process
	Comments:		By whom: Director of Homes

	The Board regularly receives reports about customer engagement and engages with the Customer Steering Group	TSMs report, iv) customer insights and projects initiated and concluded as a result • Third Party Research (Acuity) and benchmarking report to board (TE, H) • Customer Engagement activity evidenced in Quarterly Customer Insight reports (TE, H) • 1-1 meetings with customers, House and Service meetings, Reference panels / focus groups (W)	By date: Review of progress Nov 2026
(3) 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	Yes ☒ No ☐ Not applicable ☐	Evidence: • Health and Safety Policy references customer safety (H, TE, W) • Quarterly Board Pack (H, TE) • Internal Audit program (TE)	Action needed: -
	Comments:		By whom: -

regularly seeks assurance on their operation.	Policy commitments to customer and staff safety are well articulated and evidenced in board reporting	• Board Report minutes and agenda (TE) • Compliance Policies: ◦ Health & Safety (TE) ◦ Safeguarding (Adults & Children) (TE, W) ◦ Data Protection (TE, W) ◦ Fire Safety (TE) ◦ Raising Serious Concerns (TE, W) • Mandatory Training for all staff (e.g. Safeguarding, PREVENT) • Mandatory Training for Board (EDI, GDPR, H & S, Safeguarding, Risk Management, Duties and Responsibilities -TE) • Other training for board members (TE)	By date: -
(4) The organisation regularly reports to its residents on how its commitments to resident focus have been delivered.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Tenant Talk magazine includes information on Customer Engagement and complaints (W) • Customer Reference Panel meets regularly and reviews Board performance reports • Publication of Regulator's TSMs (W)	Action needed: -
	Comments: - This area is developing and is becoming embedded across the organisation		By whom: -
			By date: -
1.3 Equality, diversity and inclusion: The board	Yes ☒ No ☐	Evidence:	Action needed:

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.	Not applicable ☐	• EDI statement re Board recruitment (TE) • EDI policy (H, TE, W) • Mandatory training • Aids and Adaptations policy (H) • Board composition report (W) • Strategic Plan and People Strategy (H, TE, W) • Board EDI champion	IEB strategic priorities annual report to be reviewed by Board
	Comments: Inclusion, Equity & Belonging (IEB) strategic priorities were presented to the Board in August 2025, with objectives for further development included		By whom: Director Transformation
			By date: Aug 2026
(1) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Quarterly Board Reports contain some information about the diversity of staff and customers • Annual Board report on EDI	Action needed: -
	Comments: work on customer profiling is developing, with updates and data now included within quarterly performance reports		By whom: -
			By date: -
(2) The organisation annually publishes information about its work to deliver these commitments and objectives, and the progress it has made.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Gender Pay Gap Report (H, W) • Annual Impact Report (H,W)	Action needed: Publish 2025-26 Gender Pay Gap report
	Comments: -there is a commitment to ensure that BCHA achieves equality, diversity and inclusion goals		By whom: Director of Transformation
			By date: Sept 2026

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 ☒ No ☐ Not applicable ☐	Evidence: - Vision, Mission, Priorities and Values integral to Strategic Plan (H, TE, W) - Risk Policy (H, TE) - Values and Behaviours key element of annual staff reviews	Action needed: -
	Comments: The board has reviewed and refined these within the 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 ☒ No ☐ Not applicable ☐	Evidence: - Annual BCHAngemakers event and awards (board participates in judging) - Customers engage with the Board at away days - Communications, social media, website - Performance reports (H, TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The board seeks regular assurance that its desired culture and behaviours are being enacted in practice in alignment with its mission and values.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Quarterly Board Performance Pack including third party research (H, TE) - ART Committee reviews serious concerns and cultural matters (TE) - Internal Audit Plan & Internal Audit Charter (TE) - Board visits to services (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -

1.5 Integrity: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board Code of Conduct (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Payments, Benefits, Interests Policy and Procedure (H) - Standing Item Board Agendas (TE) & subsequent minutes - Declaration of Interest register (on appointment and annually)	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) There is a publicly available register for board and committee member declarations of interest which is reported on annually to the board.	Yes ☒ No ☐ Not applicable ☐	Evidence: Annual Report (W)	Action needed: -
	Comments: -		By whom: -
			By date: -

(4) Where there is a material conflict of interest, any individual concerned withdraws from the board’s discussions and decisions on relevant matters.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE) - Meeting agendas and minutes (TE)	Action needed: -
	Comments: -		By whom: -
	By date: -		
(5) In the case of a fundamental or ongoing material conflict, the board determines whether the person concerned should cease to be a board member.	Yes ☒ No ☐ Not applicable ☐	Evidence: Governance Framework (TE)	Action needed: -
	Comments: -		By whom: -
	By date: -		
1.6: Accountability: 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 ☒ No ☐ Not applicable ☐	Evidence: - Annual Impact Report (W) - Financial Statements, inc VFM metrics report (W) - Strategic Plan (W) - Annual Governance Statement (W) - Customer Engagement activity (W)	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 ☒ No ☐ Not applicable ☐	Evidence: - Stakeholder Map (TE) - Website - Tenant Talk (W) - Business Plan Updates AGM - Customer Steering Group engagement - Communications Strategy (H) - Attendance at LA forums - Regulator engagement - Colleague Pulse Survey - Quarterly all-colleague briefings	Action needed: -
	Comments: -		By whom: -
(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 ☒ No ☐ Not applicable ☐	Evidence: - Board Terms of Reference (TE) - Customer input to Board away days - Customer Steering Group (W) - Focus Groups (W) - Customer Insight reports (TE)	Action needed: Delivery of the C1 Regulator Improvement Plan, including through developing an evidenced customer scrutiny process
	Comments: the Regulatory Inspection in 2025 identified customer scrutiny as an area to be strengthened, with this being included in the C1 Improvement Plan		By whom: Director of Homes
(4) The organisation publishes clear and up-to-date information about its board members, committees and governance.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board of Trustees page (W)	Action needed: -
	Comments:		By whom:

	-	• Statement of Board Appointment and Composition (W) • Shareholding Policy (W) • Governance Structure • BCHA Constitution (W) • Annual Governance Statement (W)	-
	Yes ☒ No ☐ Not applicable ☐	Evidence: • Request for Information Policy (H) • Published information on website pre-empts some requests (W)	By date: -
(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.	Comments: Organisation responds openly and recognises that Social Tenant Access to Information Requirements (STAIRs) will be introduced in October 2026.		Action needed: Annual report on Board resolutions By whom: Company Secretary By date: Dec 2026
			Action needed: Implementation of initial STAIRs requirements By whom: Company Secretary By date: Oct 2026
(6) The role of shareholders in the governance of the organisation is documented and understood.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Shareholders page on website (W)	Action needed: -
			By whom:

	-	- Shareholding Membership Policy (W) - BCHA Rules (W) - Governance Framework (TE)	-
(7) Organisations with open shareholding publish their policy for the admission of shareholders.	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	By date: -
	Comments: shareholding membership was closed to the public in 2026, limiting membership to current and former Board members.		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 ☒ No ☐ Not applicable ☐	Evidence: - BCHA Rules (W) - Board Terms of Reference (TE) - Quarterly Risk Review (TE) - Quarterly Report on Serious Concerns (TE) - Board reporting template includes scope for considering reputational risk	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 ☒ No ☐ Not applicable ☐	Evidence: - Board Terms of Reference (W, TE, H) - Annual Budget and Financial Plan (TE) - Board Financial Performance Group (to be transitioned to the Finance & Treasury Committee from Sep 2026) - Audit, Risk, Treasury committee - Financial Regulations (TE, H)	Action needed: -
	Comments:		By whom: -
(2) The board gives specific consideration in setting such plans to value for money, financial sustainability, carbon neutrality and environmental	Yes ☒ No ☐ Not applicable ☐	Evidence: - Value for Money (VFM) Strategy (H, TE) - Board agendas and minutes (TE) - Strategic Plan goals (W, H, TE)	Action needed: Continue to develop ESG reporting framework
	Comments:		By whom: Board and Executive Team

sustainability, and social sustainability.	-Environmental and Social Sustainability continues to be developed	Asset Management and Development strategies (TE)	By date: Mar 2027
2.2 Structures: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Board and committee structure (TE) - Organisational management structure (W, H, TE)	Action needed:
	Comments: Committee re-structure currently underway for implementation Q2 26/27		By whom:
			By date:
(2) The board considers regularly whether the organisation's purpose could be better achieved through changes to its group, governance or staffing structures.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Annual subsidiary review (TE) - Board away days – approach to mergers (TE) - Organisational Leadership review 2025	Action needed:
	Comments: two subsidiaries (Recoop and STFH) exited the group in 2025 & 2026. New Leaf is currently dormant.		-
			By whom:
2.3 Working with others: Within the organisation's overall corporate strategy (or associated	Yes ☒ No ☐ Not applicable ☐	Evidence: 5-year Strategy Plan (TE, H, W)	-
			By whom:
			By date:

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.	Comments: -	• Annual Impact Report (H, W) • Wayfarer Consortium • Plymouth Alliance • Membership of NHF and Homelesslink • Collaborative bids such as Access Wellbeing mental health provision (Dorset)	By whom: - By date: -
2.4 The chief executive: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: • CEO JD • Financial Regulations • Delegated authority statement	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The chief executive has a formal contract of employment; this and the remuneration under it are reviewed regularly, with independent advice as required.	Yes ☒ No ☐ Not applicable ☐	Evidence: • CEO Contract and Job description	Action needed: -
	Comments: -		By whom: -
			By date: -

(3) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board chair and vice chair review of remuneration	Action needed: -
	Comments:		By whom: -
			By date: -
(4) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: Payments, Benefits & Interests (PB&I) policy (H, TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(5) There is a formal process for the chief executive's annual appraisal, overseen by the board or an appropriate committee.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, H) - CEO Appraisal Process (TE, H) - Governance Committee ToR 5.3.7 (TE) - Governance committee minutes once completed	Action needed: -
	Comments: current evidence from Governance Committee will be transferred to Board responsibility as part of committee re-structure 2026		By whom: -
			By date: -

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 ☒ No ☐ Not applicable ☐	Evidence: • Policies (H, W, TE) • Induction of staff on joining including mandatory e-learning and classroom training • Corporate Induction	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 ☒ No ☐ Not applicable ☐	Evidence: • Board attendance at BCHAngemakers – BCHA's annual conference • Board visits to services • Board Champions • People reports to Board and ART (to become ARC) committee (inc progress on People Strategy)	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 ☒ No ☐ Not applicable ☐	Evidence: • Board considers cost of living envelope at each Budget approval • Board approved People Strategy including reference to remuneration	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) The board has policies on the safety and wellbeing of its	Yes ☒ No ☐	Evidence: • H & S Policy (TE, H)	Action needed: -

workforce and reviews their effectiveness.	Not applicable ☐	- Quarterly Board operations report (H, TE) - All staff have access to independent support 24/7 through Health Assured - Colleague well-being survey published September 2023 - Oversight of Audit, Risk and Treasury (to become Audit, Risk and Culture) Committee in workforce matters, inc culture (TE)	
	Comments: -		By whom: -
			By date: -
2.6 Performance: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Strategic Plan (H, W, TE) - Finance Plan (TE) - KPIs (H, TE) - Board and Committee Terms of Reference (TE) - Board and Committee Rolling Agendas and Minutes (TE) - Reports to Board (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The board has assurance that the reports it receives provide an accurate picture of performance.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Internal Audit through Menzies - Other advice – such as Treasury consultancy - External Auditor review of accounts - Sub-committee, review Group or Task & Finish Group scrutiny (TE)	Action needed: -
	Comments: -		By whom: -
			By date:

			-
2.7 Group Structures: 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 ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
(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 ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
	Comments: Salisbury Trust for the Homeless (STFH) demerged from the group in March 2026, making this no longer applicable		By whom: -
			By date: -
(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 ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
			By whom: -

	Comments: remaining subsidiary (New Leaf) is dormant		By date: -
(4) The constitutional relationship and arrangements between the parent and each subsidiary including how oversight and control will be exercised, are formally documented.	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE (New Leaf Company dormant)	Action needed: -
	Comments: The New Leaf Company is the only subsidiary although it is dormant -		By whom: -
			By date: -
(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.	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE (New Leaf Company dormant)	Action needed: -
	Comments: -		By whom: -
			By date: -
(6) The board of the parent considers and determines whether and how this code should apply to each of its subsidiaries.	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
	Comments: New Leaf subsidiary is dormant		By whom: -

	-		By date: -
(7) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: Governance Framework (TE, W)	Action needed: -
	Comments: -		By whom: -
			By date: -
(8) 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.	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
2.8 Joint ventures and partnerships: Organisations that set up joint ventures or partnership vehicles with external counterparties ensure that these	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -

are in support of their mission and objectives.			By date: -
(1) There are formal documented arrangements concerning the accountability, performance, compliance, risk management and governance of such entities.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The benefits and risks of such entities are reviewed annually.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -

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 ☐	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: -
	Comments: -		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 ☐	Evidence: • Process for appointing Chair in Governance framework (TE, W) • Appointment of chair and Vice Chair annually (TE) • Skills matrix (TE)	Action needed: -
	Comments: -		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:	Action needed: -

audit, nor does the chair of the board chair the committee responsible for remuneration.	Comments: -	• ART (to become ARC) Terms Of Reference (TE)	By whom: -
			By date: -
(3) 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.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
	By date: -		
(4) 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.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
	By date: -		

(5) Executives are not members of the committees responsible for nominations, remuneration or audit.	Yes ☐ No ☐ Not applicable ☒	Evidence: Executives are not members of these committees	Action needed: -
	Comments: -		By whom: -
	By date: -		
(6) There is a clear, documented framework setting out delegations to staff, committees and subsidiaries.	Yes ☒ No ☐ Not applicable ☐	Evidence: - BCHA Rules D29 - D33 - Board terms of Reference 4.4 (TE) - Committee Terms of Reference (TE) - Financial Regulations (W, TE) - Governance Framework (TE) - PBI Policy (H)	Action needed: -
	Comments: -		By whom: -
	By date: -		
3.2 Functions of the board: 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:			
(1) Setting and ensuring compliance with the values, vision, mission and strategic objectives of the organisation, ensuring its long-term success.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board Terms of Reference (TE)	Action needed: -
	Comments: -		By whom: -
	By date: -		

(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.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board Terms of Reference (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) Ensuring the organisation operates effectively, efficiently and economically.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board ToR (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(4) Providing oversight, support, direction and constructive challenge to the organisation's chief executive and other executives.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board TOR (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -

(5) Appointing and, if necessary, dismissing the chief executive.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board ToR (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(6) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board ToR (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(7) Establishing, overseeing and regularly reviewing a framework of delegations to committees and staff.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board ToR (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -

(8) Establishing and overseeing control and risk management frameworks in order to safeguard the assets, compliance and reputation of the organisation.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board ToR (TE)	Action needed: -
	Comments: -		By whom: -
	By date: -		
(9) Holding to account the organisation's subsidiary boards, committees and senior staff for the exercise of any powers delegated to them.	Yes ☒ No ☐ Not applicable ☐	Evidence: Board ToR (TE)	Action needed: -
	Comments: -		By whom: -
	By date: -		
3.3 Board composition: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE) - Annual review by Governance Committee (TE)	Action needed: -
	Comments: responsibility for annual review to be moved to Board Task Group with Board approval in new		By whom: -
	By date: -		

	committee structure (2026)		
(2) The board has between five and 12 members, including any co-optees and executive members.	Yes ☒ No ☐ Not applicable ☐	Evidence: • BCHA Rules (TE, W) • Governance Framework (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) Executive board members, if appointed, are in a minority on the board and in the quorum for a board meeting.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	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 ☒ No ☐ Not applicable ☐	Evidence: • Vice Chair (and Chair) job Description (TE) • Board vice chair leads on Chair appraisal (Governance Framework)	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 collective skills and attributes it requires to be effective.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Skills Matrix (TE) reviewed by Governance Committee (July 2026) - Governance Framework (TE)	Action needed: -
	Comments: Following the July 2026 review of the skills matrix by the Governance Committee, this will transfer to a Board Task Group, with Board review annually		By whom: -
			By date: -
(2) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE) - Interview notes for Board recruitment	Action needed: -
	Comments: Church nominations to the BCHA Board ended May 2025 by Special resolution to amend those provisions in the constitution		By whom: -
			By date: -

(3) 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 line with the organisation's stated commitments to equality, diversity and inclusion.	Yes ☒ No ☐ Not applicable ☐	Evidence: • EDI policy (TE, W, H) • Governance Framework • Pen portraits (W) • Annual Statement of Board Appointments and Composition (W) • Register of board members	Action needed: -
	Comments: -		By whom: -
			By date: -
(4) People with direct lived experience of (or particular insight into) the communities served by the organisation are meaningfully engaged in governance structures.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Governance Framework (TE, W) • Recruitment Process • Annual Board Appointment and Composition Statement (W) • Customer Steering Group participates in Board away days	Action needed: -
	Comments: -		By whom: -
			By date: -
(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.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Shareholder Membership Policy (W) • Rules (Constitution) of BCHA (W) • AGM notices, agenda and minutes (W) • Shareholding page on website (W)	Action needed: -
	Comments: -		By whom: -
			By date: -

(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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Board area on website (W) - Annual Board Appointment and Composition Statement (W)	Action needed: -
	Comments: -		By whom: -
			By date: -
3.5 Committees: 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.			
(1) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Committee ToR (TE) - Committee chairs report to Board each quarter inc decisions taken or escalated	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The membership of committees is determined on the basis of the skills, attributes and diverse characteristics which the board determines are appropriate.	Yes ☒ No ☐ Not applicable ☐	Evidence: Annual Review of Committee Membership by Governance Committee (TE)	Action needed: -
	Comments: annual review of committee		By whom:

	membership to be transferred to Board Task Group with Board approval, in line with 2026 committee restructure		-
3.6 Board Remuneration: 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:			
(1) Permitted by law and by the organisation's own constitution.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) Agreed by the board as being in the best interests of the organisation.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -

(3) Aligned with the organisation's social purpose and wider reputation.	Comments: -		By whom: -
			By date: -
(4) Proportionate to the organisation's size, complexity, level of risk and resources.	Yes ☐ No ☐ Not applicable ☐	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
(5) Linked to the role's responsibilities, against which performance is reviewed.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
(6) Regularly reviewed, drawing on external advice as necessary.	Yes ☐ No ☐ Not applicable ☒	Evidence: • NOT APPLICABLE	Action needed: -

	Comments: -		By whom: -
			By date: -
(7) Disclosed in the organisation's annual financial statements.	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
	Comments: -		By whom: -
			By date: -
3.7 Tenure and renewal: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - BCHA Rules (TE, W) - Governance Framework (TE,W) - Service agreements	Action needed: -
	Comments: None		By whom: -
			By date: -
(1) The board has a strategy for its own renewal which is based on an agreed statement of the	Yes ☒ No ☐ Not applicable ☐	Evidence: - Board ToR (W, TE) - Governance Committee ToR (TE)	Action needed: -
			By whom:

skills, qualifications, diversity and other attributes required.	Comments: succession and recruitment to be transferred to Board Task Group with Board review in line with 2026 committee restructure	Reports to Board and Governance committee on succession and recruitment (TE)	-
(2) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) - Board member appraisals conducted every 2 years by Chair	Action needed: -
	Comments: -		By whom: -
			By date: -
(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 ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (W, TE) - BCHA Rules currently reflect maximum 9-year terms as per NHF model (W, TE) - Board member register records date of appointment and term served to data	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 ☒ No ☐ Not applicable ☐	Evidence: Governance Framework (TE)	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 ☒ No ☐ Not applicable ☐	Evidence: Governance Framework for BCHA (TE, W)	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 ☒ No ☐ Not applicable ☐	Evidence: - Company Secretary JD and Delegated Authority - BCHA Rules E7 (W, TE) - Governance Framework (TE, W)	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) Board and committee meetings are quorate.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Board and Committee Terms of Reference (W, TE) - Governance Framework (TE, W)	Action needed: -
	Comments:		By whom:

	-	Minutes of all meetings (TE)	-
			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 ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) - Agendas and minutes (TE) - Rolling Agendas	Action needed: -
	Comments: -		By whom: -
			By date: -
(4) Urgent decisions between board meetings are taken in accordance with predetermined and formally recorded arrangements.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) - Board Terms of Reference (TE, W) - BCHA Rules D27, D28 (W, TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(5) Meetings are fully inclusive and accessible, with adjustments made as necessary so that all members are able to attend and participate.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) - Minutes of Teams meetings (TE)	Action needed: -
	Comments: -		By whom: -

			By date: -
(6) Where meetings are conducted remotely, arrangements are made and support provided so that all members can fully participate and contribute.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Governance Framework (TE, W)	Action needed: -
	Comments: -		By whom: -
			By date: -
(7) There is a policy and procedure setting out how disputes and grievances involving members of the board can be raised, and how they are responded to.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Governance Framework (TE, W)	Action needed: -
	Comments: -		By whom: -
			By date: -
3.9 Board performance, review and learning: the board reviews and seeks to improve its performance.			
(1) All boards and committees consider their effectiveness annually and assess how they conduct their business, including:	Yes ☒ No ☐ Not applicable ☐	Evidence: • Annual review calendar (TE) • Rolling agendas (TE) • Minutes from meetings (TE)	Action needed: -
			By whom:

(a) Composition, skills, experience and diversity. (b) Effectiveness in role-modelling the desired culture, values and behaviours of the organisation. (c) Governing instruments, delegations, regulations, standing orders, structures, systems and other formal documentation as referred to in this code. (d) Timing and frequency of meetings. (e) Format of agendas, quality and scope of papers, minutes and communications. (f) Effectiveness of decision-making, including how the views and needs of key stakeholders, including residents and other customers, have informed decisions. (g) Compliance with this code and legal duties.	Comments: committee composition and recruitment to be transferred to Board Task Group with Board review in line with 2026 committee restructure. Annual review of legal, regulatory and governance compliance and review of governance processes to be transferred to the Audit, Risk & Culture Committee in line with 2026 committee restructure	• Annual Committee ToR reviews (TE) • Governance Committee annual review of committee composition (TE) • Board Member Appraisal (every 2 years) • Governance committee annual review of legal, regulatory and governance compliance and review of governance processes (TE)	- By date: -
(2) These matters are regularly and formally reviewed.	Yes ☒ No ☐ Not applicable ☐ Comments: -	Evidence: • Agendas and minutes (TE) • Rolling agendas	Action needed: - By whom: -

			By date: -
(3) All new board and committee members receive a full induction.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) - Formal Induction with checklist (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
(4) All members have an agreed programme of ongoing learning and development opportunities. This includes addressing any needs identified through the appraisal process.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Board Annual Training Plan (TE) - Scheme visits - Appraisals (every 2 years) capture actions for development and training	Action needed: -
	Comments: -		By whom: -
			By date: -
3.10 Member appraisal: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) - Appraisals every 2 years - Chair of committees' role description (TE)	Action needed: -
	Comments: None		By whom: -
			By date: -

(1) The appraisal of the board's chair is led by a senior board member, informed by the views of all board members.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) 360 degree Appraisal Process led by Board vice chair every 2 years (latest Dec 2024)	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) There is an appropriate process for responding to under-performance by individual board members, and to any conduct which may breach policies or codes.	Yes ☒ No ☐ Not applicable ☐	Evidence: Governance Framework 7.2, 7.6.2 (TE)	Action needed: -
	Comments: -		By whom: -
			By date: -
3.11 Compliance with this code: a compliance statement is published with the annual report, with an explanation given for any non-compliance.	Yes ☒ No ☐ Not applicable ☐	Evidence: Annual Report in Financial Statements (W, H, TE)	Action needed: Board approval of Annual Report in Financial Statement
	Comments: -		By whom: Director of Finance
			By date:

			Aug 2026
(1) Where the formal constitution of an organisation conflicts with the code, the constitution takes precedence.	Yes ☒ No ☐ Not applicable ☐	Evidence: Governance Framework (TE, W)	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) Where a statement of non-compliance is needed it sets out: (a) The reasons for non-compliance, and an explanation of how the relevant principle in this code is being upheld. (b) Summary plans for the achievement of compliance, if applicable.	Yes ☒ No ☐ Not applicable ☐	Evidence: As applicable	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) Where an organisation has subsidiaries which have not adopted this code, the reasons for this are given.	Yes ☐ No ☐ Not applicable ☒	Evidence: NOT APPLICABLE	Action needed: -
			By whom: -

	Comments: New Leaf exempted because the company is dormant		By date: -
(4) All policies, documents and statements referred to in this code are formally recorded as appropriate and are regularly reviewed.	Yes ☒ No ☐ Not applicable ☐	Evidence: - All documents have effective from date and next review date (TE) - Schedule of Code of Governance documentation monitored and updated as necessary	Action needed: -
	Comments: -		By whom: -
			By date: -

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 ☒ No ☐ Not applicable ☐	Evidence • Menzies Internal Audit Plan and Internal Audit Charter (TE) • ART Committee ToR (TE) • ART Annual Internal Controls Assurance Report (TE) • Internal and External auditor reports	Action needed: -
	Comments: ART Committee to become ARC Committee in line with 2026 committee restructure.		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 ☒ No ☐ Not applicable ☐	Evidence: • ART ToR (TE) • Governance Framework (TE, W) • Financial Regulations	Action needed: -
	Comments:		By whom: -
			By date: -

(3) The organisation's external auditors are independent and effective, and their appointment is reviewed at least every six years.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Financial Regulations (TE, H) - ART ToR - External Auditors including appointment process- review every 5 years (TE)	Action needed: -
	Comments: -		By whom: -
	By date: -		
4.2 Audit committee: a committee exercises independent scrutiny and challenge to provide the board with assurance.			
(1) The committee responsible for audit meets regularly and its minutes are available to the board.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Committee Agendas and Minutes (TE) - Committee ToR (TE)	Action needed: -
	Comments: -		By whom: -
	By date: -		
(2) The committee exercises oversight of the internal and external audit functions.	Yes ☒ No ☐ Not applicable ☐	Evidence: ART ToR (TE)	Action needed: -
	Comments: ART Committee to become ARC Committee in line with 2026 committee restructure.		By whom: -
	By date: -		

(3) The committee annually meets with the external auditors with only non-executives present.	Yes ☒ No ☐ Not applicable ☐	Evidence: - ART ToR (TE) - Minutes of committee meeting (TE)	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 ☒ No ☐ Not applicable ☐	Evidence: - ART ToR (TE) - Quarterly Chair Report to Board - standing agenda item (TE)	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 ☒ No ☐ Not applicable ☐	Evidence: Committee Membership log	Action needed: -
	Comments: -		By whom: -
			By date: -

4.3 Risk: 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: ART ToR (TE)	Action needed: -
	Comments: ART Committee to become ARC Committee in line with 2026 committee restructure.		By whom: -
(2) The board has a suitable risk management framework in place; it understands the organisation's risk profile and the effectiveness of key controls.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Risk Management Policy (H) - BCHA Risk Appetite Assessment (TE) - Sector Risk Profile (TE)	Action needed: -
	Comments: -		By whom: -
(3) The board establishes and documents its appetite for the risks the organisation faces in pursuit of its strategy.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Risk Management Policy (H, TE) - BCHA Risk Appetite Assessment (TE)	Action needed: -
	Comments: -		By whom: -
(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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Business Continuity Plan is available - including business continuity insurance - ART review of aspects of resilience and continuity over 25-26	Action needed: -
	Comments: -		By whom: -

(5) The board includes members with skills and experience appropriate to the level and type of risks faced by the organisation.	Yes ☒ No ☐ Not applicable ☐	Evidence: Skills Audit and reports to Governance Committee	Action needed: -
	Comments: skills audit to be transferred to Board Task Group with Board approval (annual), in line with committee restructure 2026		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 ☒ No ☐ Not applicable ☐	Evidence: ART Quarterly Strategic risk Report (including Risk Register) and subsequent Quarterly report to Board (TE)	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 ☒ No ☐ Not applicable ☐	Evidence: Financial Plan including stress testing (TE)	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	Yes ☒ No ☐ Not applicable ☐	Evidence: Director's Report - Financial Statements (W)	Action needed: -
	Comments:		By whom:

emerging risks and how these are being managed or mitigated.	-		-
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.			
(1) The board has a robust internal control framework and has regular assurance about the effectiveness of key controls including controls to ensure compliance.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Menzies Internal Audit Plan and reports • Other consultancy reports or external regulatory reports from time to time (TE)	Action needed: -
	Comments: -		By whom: -
(2) 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.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Internal Audit Reports • Quarterly Board Performance reports inc safety matters (TE) • Safeguarding report to Governance Committee, 6-monthly (TE)	Action needed: -
	Comments: safeguarding report to go to Customer & Services Committee from Oct 2026, in line with committee restructure.		By whom: -
(3) The board publishes an annual statement setting out its approach to compliance and internal control.	Yes ☒ No ☐ Not applicable ☐	Evidence: • Financial Statements (W, H)	Action needed: -
	Comments: -		By whom: -

4.5 Whistleblowing and confidential concerns: 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.

(1) The board ensures that appropriate whistleblowing policies and procedures are in place.	Yes ☒ No ☐ Not applicable ☐	Evidence: Raising Serious Concerns Policy (W, H, TE)	Action needed: -
	Comments: -		By whom: -
(2) The board (or an appropriate committee) regularly receives an account of matters raised under these policies, and actions taken in response.	Yes ☒ No ☐ Not applicable ☐	Evidence: - ART Committee ToR (TE) - Quarterly serious concerns report for ART Committee (TE)	Action needed: -
	Comments: -		By whom: -
(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.	Yes ☒ No ☐ Not applicable ☐	Evidence: - Governance Framework (TE, W) - Service Agreements	Action needed: -
	Comments: -		By whom: -

'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/

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