## Code of Governance 2020: compliance checklist

The Code of Governance	Compliance (Y/N) Comments:	Evidence:	Action needed:
Principle 1: Mission and values			
The board sets and actively drives the organisation's social purpose, mission and	res - ino -	Evidence: Annual approval of the Derby	Action needed:
values and through these embeds within the organisation resident focus, inclusion, integrity, openness and accountability.	Comments: The Board understands its	Homes delivery plan to be submitted to the Council each year - this includes Mission,	By whom:
	unique status being both part of and not part of the Council as our owner. The Board reviews its mission and sets a delivery plan every year to be agreed with the Council.	Values and Strategic Objectives	By date:
Compliance: from principle to practice			
1.1 <b>Mission</b> : 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 □	Evidence: Annual approval of the Derby	Action needed:
	Comments: This is reviewed every year by	Homes delivery plan to be submitted to the Council each year - this includes Mission, Values and Strategic Objectives	By whom:
	both management and the Board		By date:



1.2 <b>Resident focus</b> : the needs and safety of the organisation's current and future	Yes ⊠ No □	Evidence: A third of Board Members are	Action needed:
residents and other customers are placed at the heart of the board's decision-making.	Comments: The ALMO structure includes	tenants.	By whom:
	a very strong emphasis on tenant representation which Derby Homes has always strived to sustain.		By date:
(1) There are policies, frameworks and opportunities which enable, encourage and	Yes ⊠ No □	Evidence: Board is one third residents.	Action needed:
support residents and other customers to engage with, influence and contribute to strategic decision-making.	Comments:	The Operational Board (OB) is constituted to consist of a majority of residents - tenants and leaseholder representatives are included in decisions on policy matters that affect tenants	By whom:
strategic decision-making.			By date:
(2) The board has access to insight into the views and needs of the organisation's	Yes ⊠ No □	Evidence:	Action needed:
residents and other customers (including			Area for improvement-
insight into their concerns and complaints) and uses this to inform decisions where appropriate.			Recruit to remaining Operational Board vacancies
	Comments:		By whom: Appointment Panel



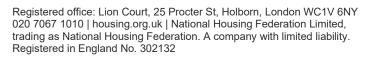
	The Operational Board has a few vacancies and new members and needs to recruit to the remaining vacancies.	The DACP (independent residents' group) has direct representation on the Operational Board and is consulted on key decisions (e.g. rents and service charges). We also operate a Customer Voice panel to scrutinise any area of operation and make recommendations where it feels that improvements should be considered. Complaints are reported regularly to the OB	By date: September 2021
(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 receives reports annually on their operation.	Yes No No Comments:  Health and Safety forum is chaired by Board Member (H&S champion) and meets 6 times a year to focus on all H&S issues.	Evidence: ROSPA Presidents Award for H&S. Extensive policies in place as well as risk assessments including for COVID-19. Report to Board on H&S every meeting. SMT meetings have H&S update every month and further meetings with Exec and unions as required	Action needed:  By whom:  By date:
(4) The organisation regularly reports to its residents on how its commitments to	Yes ⊠ No □	Evidence:	Action needed:



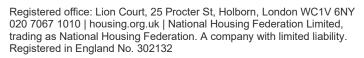
resident focus have been delivered.	Comments: Existing feedback to tenants has been shifting from paper to electronic gradually and can go further over time.	Derby Homes News is delivered to all homes 3 times a year. DH website is being refreshed to increase usability and feedback.Annual Report has won national awards (Public Finance Innovation)	By whom:  By date:
1.3 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.	Yes No Comments:  Board has appointed a champion and has relevant reports and policies in place	Evidence:  DH has an Equalities forum and Board Champion for equalities who meet to review issues and make recommendations to the Board and management.  Equalities reports and policies in place and reviewed. Data collated and considered by SMT and reported to the Board.	Action needed:  By whom:  By date:
(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 ☐  Comments:	Evidence:  Board Report March 2021 adopted the Equality Forum's workplan and objectives as the Board's own.	Action needed:  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 Comments:	Evidence: Following on from the Board setting its objectives it will report on progress through the Equalities forum back to the Board.	Action needed:  By whom:  By date:
1.4 <b>Culture</b> : the board regularly considers and defines the culture and behaviours that will best enable the organisation to deliver its mission and values.	Yes No Comments:	Evidence: Delivery Plans for many years	Action needed:  By whom:
	Plans have consistently reviewed and stated not only mission and strategic objectives but also the culture and standards - Values - that are expected of everyone in Derby Homes.		By date:
(1) The board leads by example and promotes the culture of the organisation.	Yes ⊠ No □	Evidence: Chair is Vice Chair of the	Action needed:
	Comments:	National Federation of ALMOs. Councillors actively operate on DH Board in a non	By whom:
		political manner to promote the positive nature of DH within the Council.	By date:
	Yes ⊠ No □	Evidence:	Action needed:



(2) The board seeks regular assurance that its desired culture and behaviours are being enacted in practice in alignment	Comments: Assurance on culture is a	Accounts and Delivery Plan reports,	By whom:
with its mission and values.	constant theme in all areas of the operation of the Board		By date:
1.5 <b>Integrity</b> : the board, its members and the organisation maintain high standards of	Yes ⊠ No □	Evidence: Board Members sign up to an	Action needed:
probity and conduct.	Comments:	internal Code of Conduct and services agreement and abide by Standing orders which are	By whom:
		periodically reviewed.	By date:
		Governance Committee scrutinises governance issues and recommends practice to the Board.	
(1) The board adopts a formal code of conduct to which all its members	Yes No No	Evidence: Code of Conduct	Action needed:
adhere.	Comments: Code of conduct in place		By whom:
			By date:
(2) The board has clear policies and procedures for its members to identify,	Yes ⊠ No □	Evidence:	Action needed:
declare, record and manage any actual, potential and perceived conflicts of interest.	Comments:		By whom:

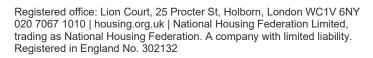




		Sign up documentation, annual report of interests of not only Board members but also SMT.	By date:
(3) There is a publicly available register for board and committee member	Yes ⊠ No □	Evidence:	Action needed:
declarations of interest which is reported		annual report of interests [if	
on annually to the board	Comments: check this is public?	not public make it so]	By whom:
	·		By date:
(4) Where there is a material conflict of interest, any individual concerned	Yes No No	Evidence: Standing orders	Action needed:
withdraws from the board's discussions and decisions on relevant matters.	Comments: Written into Standing orders		By whom:
	that this is the case		By date:
(5) In case of a fundamental or ongoing material conflict, the board determines	Yes ⊠ No □	Evidence: Removal of former Vice Chair	Action needed:
whether the person concerned should		when he became Cabinet	
cease to be a board member.	Comments: Would take action in such an	Member for Housing at the	By whom:
	event - only recent case related to action by Council rather than the Board.	Council - Council advised that he could not continue	By date:
	Yes ⊠ No □	Evidence:	Action needed:
	Comments:		By whom:



1.6 <b>Accountability</b> : the board operates openly and transparently, and demonstrates accountability to key stakeholders including residents, other customers, and partner statutory bodies.			Board meetings are open to the Public. Questions are allowed at meetings. AGM held each year for shareholder. Regular oversight meetings with the Council as client at all levels.	By date:
(1) The board publishes information annually about the organisation's activities, performance and plans for	Yes 🖾	No 🗆	Evidence: Self assessment reports have	Action needed:
future improvements which is accessible to its key stakeholders, and covers the	Comments:	Comments:	been made public and are available on our website.	By whom:
matters referred to in this code.		Similar openness relating to the Delivery plan, accounts	By date:	
			and Board meetings. Performance statistics	
			published via Council's performance team and system.	
			-,	
(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 🗆	Evidence: Regular canvassing of opinion	Action needed:
	Comments:		of residents. Follow up to all negative feedback on repairs	By whom:
			and complaints.	By date:
	Yes 🖾	No 🗆	Evidence:	Action needed:





(3) Opportunities and information are provided for residents and other	Comments:	Customer Voice (formerly Scrutiny panel) is supported by DH officers and offered the opportunity to investigate and report on any area of operations.	By whom:
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.			By date:
(4) The organisation publishes clear and up-to-date information about its board	Yes ⊠ No □	Evidence: Website has information on all	Action needed:
members, committees, and governance.	Comments:	these aspects. Board papers other than confidential accessible on the web	By whom:
			By date:
(5) The organisation responds in a considered, open and transparent way	Yes ⊠ No □	Evidence: Data protection and FOI	Action needed:
to requests for information about its work, activities, and decisions made by the board, where it cannot provide	Comments: Responses dealt with in an	officer employed with specific remit on this and GDPR issues. Responses dealt with	By whom:
,	open manner.	in an open manner.	By date:
(6) The role of shareholders in the governance of the organisation is	Yes ⊠ No □	Evidence:	Action needed:
documented and understood.	Comments:		By whom:



	DCC are our only shareholder	Governance arrangements make clear that the Council is our 100% owner and that the Council is the Person with Significant Control (PSC) for Derby Homes.	By date:
(7) Organisations with open shareholding publish their policy for admission of shareholders.	Yes No No	Evidence: M&As	Action needed:
Shareholders.	Comments: N/A		By whom:
	Shareholding is closed to DCC only.		By date: N/A
1.7 <b>Reputation and trust</b> : the board takes into account in its actions and decisions the	Yes ⊠ No □	Evidence: Board papers over many	Action needed:
importance of maintaining trust in the organisation and upholding its reputation.	Comments:	years. Risk management approach includes reputational	By whom:
		damage as a metric.	By date:
Principle 2: Strategy and delivery			
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	Yes ⊠ No □	Evidence: Board budget setting	Action needed:
	Comments:	arrangements and delivery plan setting, monitoring and outcomes all reported	By whom:
their delivery.		outcomes an reported	By date:



Compliance: from principle to practice				
2.1 <b>Strategy, resources and plans</b> : the board sets the organisation's overall	Yes ⊠ No □	Evidence: Delivery Plan, Budget, long term planning horizon for investments, consideration of homelessness spend above income	Action needed:	
direction and strategy in line with its charitable, community benefit or other constitutional purposes.	Comments: The Board has clear ambitions		By whom:	
Constitutional purposes.	to both grow the stock at a moderate pace but also to support Council services especially homelessness to a degree beyond our annual income for those services.		By date:	
(1) The board sets financially sustainable plans to ensure that the organisation has the resources it needs to deliver its strategy.	Yes ⊠ No □	Evidence: Budget papers every year and planning meetings plus finance training on an annual basis.	Action needed:	
	Comments: Board plans are clearly		By whom:	
	financially sustainable and have been altered according to prevailing situations.	Dasis.	By date:	
	Yes ⊠ No □	Evidence:	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 sustainability; and social sustainability.	Vfm and finances are routinely considered and stable, carbon/environmental/social policies are an area that are good on the ground but need to be updated.	VfM report every year to OB and Board, financial sustainability through budget process, carbon use is reported in annual accounts, social value policy in place. All Board reports consider impact on environment and finances amongst other things.	By date:
2.2 <b>Structures</b> : organisational and governance structures support the delivery	Yes ⊠ No □	Evidence:	Action needed:
of the organisation's social purpose and strategic objectives.	Comments:		By whom:
Strategio objectives.	Single company PRP structure		
	works for limited scale of owned property (well under 1,000 owned properties)		By date:
(1) Structures are designed to support	Yes No 🗆	Evidence:	Action needed:
effective delivery and oversight of		ALMO reviews over many	
strategy, are clearly set out, and are regularly reviewed to ensure they	Comments:	years.	By whom:
remain fit for purpose.	ALMO reviews over last		
	decade have each come to		By date:
	the same conclusion - that the single company structure is		
	the most efficient and effective		
	for our current plans.		



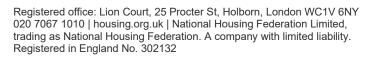
(2) The board considers regularly whether the organisation's purpose could be better achieved through changes to its group, governance or staffing structures.	Yes No No Comments:  Any major (over £250k/yr) change to staffing structure requires Board approval, governance committee considers all governance issues including rule changes on a regular basis.	Evidence: Example of the enhanced Fire Safety team considered by Board in September 2020 Governance arrangements and reviews	Action needed:  By whom:  By date:
2.3 Working with others: within the organisation's overall corporate strategy (or associated strategies and plans) there is consideration given to whether and how active cooperation, collaboration, joint working or partnership with other organisations could enable it to deliver its social purpose and strategies more	Yes No Comments:	Evidence: Homelessness strategy, working with the Council on many issues beyond narrow remit	Action needed:  By whom:  By date:
effectively and economically.  2.4 <b>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.	Yes No No Comments: Chief Executive is the Managing Director to avoid confusion with the Council's Chief Executive in internal communications.	Evidence: Governance arrangements	Action needed:  By whom:  By date:



(1) The responsibilities of, and delegations to, the chief executive are clearly set	Yes ⊠ No □	Evidence: Delegation of Authority	Action needed:
out.	Comments: Delegation of Authority in		By whom:
	governance arrangements sets out a lot of detail.		By date:
(2) The chief executive has a formal contract of employment; this and the	Yes No 🗆	Evidence: Governance Committee paper on Exec pay December 2017	Action needed:
remuneration under it are reviewed regularly, with independent advice as required.	Comments:  Last review of exec pay was in		By whom:
	2017		By date:
(3) The chief executive's remuneration package is set at a level which is	Yes No D	Evidence: Governance Committee paper	Action needed:
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.	Comments: Report makes reference to	on Exec pay December 2017	By whom:
	these issues.		By date:
	Yes ⊠ No □	Evidence: Leaving Work policy	Action needed:
	Comments:		By whom:



(4) If the chief executive's contract is to be determined, any extra contractual severance payments or benefits are approved by the board with the reasons, costs and reputational risks clearly minuted.	Not happened yet but any payment above procedures has to be approved by the Governance committee and policy states that any additional costs must be approved by governance committee.		By date:
(5) There is a formal process for the chief	Yes ⊠ No □	Evidence:	Action needed:
executive's annual appraisal, overseen by the board or an appropriate committee.		Process exists but is out of date	Area for improvements - appraisal process needs to recommence
	Comments:		By whom:
	This is overdue - was		Chair
	postponed as a result of the pandemic		By date: July 2021
2.5 <b>Workforce</b> : the board ensures that its	Yes No 🗆	Evidence:	Action needed:
workforce policies and practices support the success of the organisation and reflect its		Personnel policies include	
values and its commitments to equality, diversity and inclusion.	Comments:	many aspects of positive support for those requiring it and an approach to equality	By whom:
		that promotes diversity and inclusion.	By date:
	Yes ⊠ No □	Evidence:	Action needed:
	Comments:		By whom:

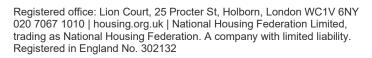




(1) The board has access to insight into the views of staff, such that their opinions and needs are understood, and influence the board's decisions as appropriate.		Annual Report on equalities, updates on staff matters through Managing Director's report. Staff Survey results.	By date:
(2) The board determines a strategy for remuneration of the workforce which is aligned to the organisation's size and	Yes ⊠ No □	Evidence: Adoption of NJC and Trades	Action needed:
complexity, and to its purpose and values.	Comments:	standard remuneration scales other than for Executives.  Exec pay reviewed by	By whom:
		Governance Committee and compared to similar organisations in size and complexity - December 2017 review.	By date:
(3) The board has policies on the safety and wellbeing of its workforce and reviews their effectiveness.	Yes ⊠ No □	Evidence: H&S policy. Wellbeing	Action needed:
	Comments:	initiatives. Employee feedback through surveys. Risk	By whom:
		Assessments in place for known risks. Access to Employee support/ wellness independent of DH.	By date:
	Yes ⊠ No □	Evidence:	Action needed:



2.6 <b>Performance</b> : the board has demonstrable oversight of the organisation's performance.	Comments: Oversight of performance can be strangthened at Board level. OB given the task along with the Council as owner. Board get reports in Part C but wish to highlight any exceptions.		By whom: By date:
(1) The board exercises active and regular oversight of delivery of strategies and plans. This includes scrutinising key operational and finance performance	Yes No Comments:	Evidence:	Action needed:  By whom:
information, and information concerning resident insights and satisfaction.	Lots of data is provided especially around performance and finance including resident satisfaction		By date:
(2) The board has assurance that the reports it receives provide an accurate	Yes ⊠ No □	Evidence: Internal Audit reports are	Action needed:
picture of performance.	Comments: Safety statistics being	required for any areas of concern to management on data. Performance reporting is handled by the Council semi independently from DH	By whom:
	subjected to additional scrutiny in view of forthcoming increased regulation in this area.		By date:
2.7 <b>Group structures</b> : organisations with subsidiaries ensure that these entities	Yes No No	Evidence:	Action needed:
support and enhance delivery of the group parent's mission.	Comments:		By whom:





	N/A		By date:
(1) Where the group parent is not a registered provider, formal	Yes No No	Evidence:	Action needed:
arrangements are in place to ensure that any registered provider subsidiaries remain compliant with their own	Comments: N/A		By whom:
charitable or community benefit purposes, and with regulatory requirements.			By date:
(2) Where a subsidiary is to be or has been established, the benefits, risks and relationship are reviewed by the board of the parent beforehand and thereafter regularly.	Yes No No	Evidence:	Action needed:
	Comments: N/A		By whom:
J ,			By date:
(3) The board of a parent organisation in a group structure has the responsibility	Yes No No	Evidence:	Action needed:
and the reserve powers to direct, and if necessary, intervene in the governance of its subsidiaries.	Comments: N/A		By whom:
			By date:
	Yes No No	Evidence:	Action needed:
	Comments:		By whom:



(4) The constitutional relationship and arrangements between parent and each subsidiary including how oversight and control will be exercised, are formally documented.	N/A		By date:
(5) The board of the parent approved the group's plans and budgets, and holds	Yes No No	Evidence:	Action needed:
the board of each subsidiary accountable for the delivery of its objectives.	Comments: N/A		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 No	Evidence:	Action needed:
	Comments: N/A		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	Yes No No	Evidence:	Action needed:
	Comments: N/A		By whom:
and any resulting conflicts of interest.			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 Comments:	Evidence:	Action needed:  By whom:  By date:
			•
2.8 <b>Joint ventures and partnerships</b> : organisations that set up joint ventures or	Yes No No	Evidence:	Action needed:
partnership vehicles with external counterparties ensure that these are in support of their mission and objectives.	Comments: N/A		By whom:
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 No	Evidence:	Action needed:
	Comments: N/A		By whom:
o o			Action needed:
(2) The benefits and risks of such entities are reviewed annually.	Yes No No	Evidence:	Action needed:
	Comments:		By whom:
			Action needed:
Principle 3: Board effectiveness			



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.	Yes No Comments:	Evidence: This review, previous adoption of the NHF 2015 Code and annual reporting on this issue to be stated in the accounts. Annual Board Effectiveness reviews at Board level	Action needed:  By whom:  By date:
Compliance: from principle to practice			
3.1 Roles and responsibilities: the statutory and governance roles and	Yes No No	Evidence: Governance arrangements	Action needed:
responsibilities of the board, of its individual members, office holders and of others who work to the board are clearly set out.	Comments: Governance arrangements all		By whom:
·	in one document		By date:
(1) The board elects or appoints a chair with appropriate skills to be responsible for leading the board and ensuring its	Yes ⊠ No □		Action needed:
leading the board and ensuring its effectiveness.	Comments:		By whom:
			By date:
	Yes ⊠ No □	Evidence:	Action needed:
		Governance arrangements	



(2) The chair of the board does not chair and is not a member of the committee responsible for audit, nor does the chair of the board chair the committee responsible for remuneration.	Comments:		By whom:  By date:
(3) Where there are executive board members, the board formally records and publishes policies about the role	Yes No No	Evidence: - no executive directors	Action needed:
they play on the board and committees, and makes clear those matters for which	Comments:  N/A - no executive directors		By whom:
they must leave the meeting, or not participate in debate or decision-making.			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 □	Evidence: - no executive directors	Action needed:
	Comments: - no executive directors		By whom:
			By date:
(5) Executives are not members of the committees responsible for nominations,	Yes ⊠ No □	Evidence: - no executive directors	Action needed:
remuneration or audit.	Comments: - no executive directors		By whom:
			By date:
(6) There is a clear, documented framework setting out delegations to staff, committees and subsidiaries.	Yes ⊠ No □	Evidence: Scheme of Delegations	Action needed:
	Comments:		By whom:



	No subsidiary companies		By date:
3.2 <b>Functions of the board</b> : there is a record of the essential functions and other	Yes No No	Evidence: Scheme of Delegations	Action needed:
matters which are reserved for board decision and cannot be delegated. In addition to matters set out in law, statute,	Comments:		By whom:
regulations and in the organisation's constitution these include as a minimum:			By date:
(1) Setting and ensuring compliance with the values, vision, mission and strategic objectives of the organisation, ensuring its long-term success;	Yes ⊠ No □	Evidence: Delegation of Responsibilities	Action needed:
	Comments:	in Governance Arrangements	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 □	Evidence: Delivery plans, policies,	Action needed:
	Comments:	forum, reports, governance	By whom:
		arrangements, mission/values	By date:
(3) Ensuring the organisation operates effectively, efficiently and economically;	Yes ⊠ No □	Evidence:	Action needed:
	Comments:		By whom:





		Annual reports using Housemark and other sources to Board and Operational Board as well as formal accounts.	By date:
(4) Providing oversight, support, direction and constructive challenge to the	Yes ⊠ No □	Evidence: Regular discussions at Board	Action needed:
organisation's chief executive and other executives;	Comments:	meetings, monthly briefing session for Chair/VCs, Committee level challenges to	By whom:
		reports, approvals required of significant spends.	By date:
(5) Appointing and, if necessary, dismissing the chief executive;	Yes ⊠ No □	Evidence: Governance arrangements	Action needed:
	Comments:		By whom:
			By date:
	Yes ⊠ No □	Evidence:	Action needed:
	Comments:		By whom:



(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;		Budget - scrutiny day held in Nov/Dec in advance of meeting to set budget, approval in January to allow time to revise if necessary. Accounts scrutinised by external audit then Audit Committee before Board approval.	By date:
(7) Establishing, overseeing and regularly reviewing a framework of delegations to	Yes ⊠ No □	Evidence: Scheme of Delegations	Action needed:
committees and staff;	Comments:		By whom:
			By date:
(8) Establishing and overseeing control and risk management frameworks in order to	Yes ⊠ No □	Evidence: Audit Committee scrutiny and	Action needed:
safeguard the assets, compliance and reputation of the organisation;	Comments:	recommendation to the Board each year on risk	By whom:
		management	By date:
(9) Holding to account the organisation's subsidiary boards, committees and	Yes No No	Evidence: Constitutions of committees	Action needed:
senior staff for the exercise of any powers delegated to them.	Comments:	reviewed regularly	By whom:





			By date:
3.3 <b>Board composition</b> : board members have the attributes and time needed to	Yes No No	Evidence: Skills matrix maintained;	Action needed:
govern effectively, and each member exercises independent judgement in doing so.	Comments:	independent judgement required attribute in Board Members code of conduct.	By whom:
		Members code of conduct.	By date:
(1) The organisation determines, documents and regularly reviews the	Yes ⊠ No □	Evidence: Change from 15 to 9 members	Action needed:
board composition best suited to its needs; in the case of a group subsidiary, this may be a matter for the	Comments:  Matter for the Council as	in 2013	By whom:
group parent.	shareholder		By date:
(2) The board has between five and 12 members, including and co-optees and executive members.	Yes ⊠ No □	Evidence: Constitution	Action needed:
executive members.	Comments: 9 - one third tenants,		By whom:
	Councillors and independents		By date:
(3) Executive board members, if appointed,	Yes No No	Evidence:	Action needed:
are in a minority on the board and in the quorum for a board meeting.	Yes - No -	- no exec members	, toda, noodod.
quorant for a board fricoung.	Comments:		By whom:



	N/A		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 ⊠	Evidence: Appraisals to take place this year and next - DH is behind at present with this process as a result of deferrring in initial stages of pandemic	Action needed: Will be actioned May 21 making this area compliant. Add duty to vice chairs' role description.
	Comments:  Not a dedicated duty at		By whom: Board approval
	present		By date: May 2021
3.4 Board election, selection and appointment: the board has a diverse membership with the collective skills and attributes needed to govern effectively.	Yes ⊠ No □	Evidence: Skills Matrix kept and shared with appointment panel and Council (for DCC appointees)	Action needed:
	Comments:		By whom:
			By date:
(1) The board understands, states and regularly reviews the collective skills and attributes it requires to be effective.	Yes ⊠ No □	Evidence: Skills Matrix kept	Action needed:
	Comments:		By whom:
			By date:





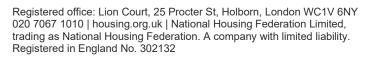
(2) Prospective board and committee members undergo an open and merit-based assessment process to establish their suitability. Where the	While the recognist has the	Evidence: While the Board's constitution recognises that the Council has the righ to nominate a	Action needed:  By whom:
organisation's 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.	While this applies fully to tenant and independent board members, those nominated by the Council are not subject to any vetting by the Board in line with our constitution. We have, though, submitted our skills matrix to the Council to assist with their selection and to see if any gaps might be addressed	third of the Board members, the induction process undertaken for all new members ensures that the need for an independent approach to Derby Homes matters. It is also open to the Board to reject any member that it regards as not have the necessary attributes and qualities.	By date:
(3) The membership of board and committees comprises people with diverse backgrounds and attributes,	Yes ⊠ No □	Evidence: Diversity monitoring	Action needed:
having regard to the diversity of the communities the organisation serves	Comments: Within the constraints above,		By whom:
and in line with the organisation's stated commitments to equality, diversity and inclusion.	the Board appointments while based on merit have attempted to balance the Board composition wherever possible.		By date:
	Yes ⊠ No □	Evidence: One third tenants on main	Action needed:
	Comments:	board, majority tenants on OB.	By whom:



(4) People with direct lived experience of (or particular insight into) the communities served by the organisation are meaningfully engaged in governance structures.	This is why we prefer to have tenants on the Board and a majority on the OB.		By date:
(5) Shareholders who are not board members are supported and informed to	Yes No No	Evidence: DCC only shareholder	Action needed:
play their proper constitutional role in the organisation's governance and in particular in the election of board	Comments: N/A		By whom:
members.			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 □	Evidence: Accounts detail all members during the year	Action needed:
	Comments: Each Board Member has short		By whom:
	summary on website.		By date:
3.5 <b>Committees</b> : committees are established where the board determines	Yes ⊠ No □	Evidence: Committees are:	Action needed:
that they will enable it to exercise more effective scrutiny, control or oversight of particular areas of the organisation's activity.	Comments:	Audit, Governance, Operational	By whom:
			By date:
	Yes ⊠ No □	Evidence: Board agendas indicate	Action needed:
	Comments:	reports back	By whom:



(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.	could add requirement to report on any exercise of delegated authority?		By date:
(2) The membership of committees is determined on the basis of the skills,	Yes No No	Evidence:	Action needed:
attributes and diverse characteristics		Audit - experience of relevant	
which the board determines are appropriate.	Comments:	discipline helpful (bearing in mind limited pool of	By whom:
арргорнаю.		members), boosted by OB additional members with such skills;	By date:
		OB - majority of tenants but also one each sector (Cllr/Ind/Tenant) Board Member	
3.6 <b>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:	Yes ⊠ No □	Evidence: Governance Committee taking advice from the Council and external advice if required.	Action needed:
	Comments:		By whom:
			By date:
(1) Permitted by law and by the organisation's own constitution;	Yes ⊠ No □	Evidence: Board approvals	Action needed:

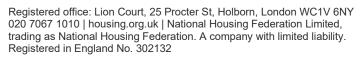




	Comments:		By whom:
			By date:
(2) Agreed by the board as being in the best interests of the organisation;	Yes No No	Evidence: Board approvals	Action needed:
	Comments:		By whom:
			By date:
(3) Aligned with the organisation's social purpose and wider reputation;	Yes No No	Evidence: Board approvals	Action needed:
	Comments:		By whom:
			By date:
(4) Proportionate to the organisation's size, complexity, level of risk and resources;	Yes No No	Evidence:  Comparitors made when establishing the scheme, no change since original scheme	Action needed:
	Comments:		By whom:
		applied other than to add GC chair to paid offices.	By date:



(5) Linked to the role's responsibilities, against which performance is reviewed;	Yes ⊠ No □	Evidence: Only Chairs of Committees,	Action needed:
	Comments:	Chair and VCs paid - no payment for Councillors	By whom:
			By date:
(6) Regularly reviewed, drawing on external advice as necessary;	Yes ⊠ No □	Evidence: Report to Governance	Action needed:
	Comments:  Last reviewed in 2019.  Awaiting update from DCC on own allowance changes / inflationary increases.	Committee April 2019 and Board November 2018.	By whom:
			By date:
(7) Disclosed in the organisation's annual financial statements.	Yes ⊠ No □	Evidence: Accounts	Action needed:
	Comments:		By whom:
			By date:
3.7 <b>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	Yes ⊠ No □	Evidence:	Action needed:
	Comments:		By whom:
to achieve an appropriately skilled, diverse and independent board membership.			By date:





(1) The board has a strategy for its own renewal which is based on an agreed statement of the skills, qualifications,	Yes ⊠ No □	Evidence: Skills matrix, recruitment	Action needed:
diversity and other attributes required.	Comments:	processes	By whom:
, in the second second	Board appoints appointment		
	panel who are made aware of overall skills matrix and if any		By date:
	areas of weakness overall.		
(2) Where a member is at the end of a	Yes No D	Evidence:	Action needed:
term of office and is eligible for	1100	Constitution and Board	
reappointment, this is subject to considering the member's performance	Comments:	resolution to subject renewal to a recruitment process	By whom:
and skills, and the needs of the board.	Board tightened own renewal		
	each three years by requiring		By date:
	an open recruitment each time - exception made in 2020 due		
	to pandemic.		
	Yes □ No ⊠	Evidence:	Action needed:
		Constitution	Continued non compliance
		<u> </u>	explanations for those
			Members exceeding 9 years.
	Comments:		By whom:



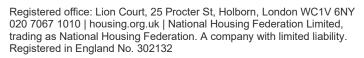
	,	 
(3) Maximum tenure will normally be up to	DH Constitution limits to	By date:
six consecutive years (typically	normal 9 years in line with	
comprising two terms of office), but	previous Code and allows for	
where a member has served six years,	further extenstion with the	
and the board agrees that it is in the	approval of the Board. This	
organisation's best interests, their	has been a consistent non	
tenure may be extended up to a	compliance under the previous	
maximum of nine years.	code and will remain so in the	
	new one. The Board's view is	
	that 6 years is too short for a	
	maximum tenure and that 9	
	years would remain. The	
	provision of open recruitment	
	competition at each 3 year	
	cycle is considered to be	
	sufficient to ensure that	
	membership is set for the	
	organisation's best interest.	
	With a limited membership	
	and with thirds from tenants,	
	councillors and independents,	
	longer periods up to nine	
	years and sometimes beyond	

are beneficial in maintaining an appropriate skills mix.

(4) A member who has left the board is not	Yes No No	Evidence:	Action needed:
re-appointed for at least three years.		Constitution	Non compliance explanation will be necessary. Previous requirement was for not reappointed for a whole cycle which for councillors was one year and therefore compliant.
	Comments:		By whom:
	The Council has the right to appoint members on an annual basis. It would be possible for a member to leave the board one year and return the next. While this hasn't happened, it could.		By date:
(5) These provisions concerning tenure	Yes □ No ⊠	Evidence:	Action needed:
apply to office held across all of the organisation's boards and committees,		OB arrangement for Dennis Rees OBE	Non compliance statement required
and those of predecessor organisations, including service as a co-optee.	Comments: Dennis Rees OBE has been		By whom:
	appointed on a lifetime basis to the OB to reflect his long service and extensive knowledge of both Derby Homes and the sector.		By date:
	Yes No 🗆	Evidence:	Action needed:
		Board papers	



3.8 <b>Conduct of business</b> : the board and its committees conduct their business efficiently, and on the basis of an appropriate level and quality of information.	Comments:		By whom: By date:
(1) The board has appointed (and is	Yes ⊠ No □	Evidence:	Action needed:
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.	Comments:	Company Secretary in place and accessible - supported by Governance Services manager and corporate support team	By whom:
			By date:
(2) Board and committee meetings are quorate.	Yes ⊠ No □	Evidence: Minutes on CMIS	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 ⊠ No □	Evidence:  Agendas on CMIS, circulated nine days in advance of the meeting to ensure receipt a week before.	Action needed:
	Comments:		By whom:
			By date:





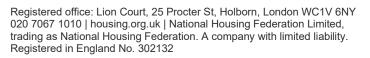
(4) Urgent decisions between board meetings are taken in accordance with predetermined and formally recorded arrangements.	Yes No Comments: long establised and working practice when necessary.	Evidence: Urgent Actions - decisions recorded at next meeting and approved by at least two Chair and VCs.	Action needed:  By whom:  By date:
(5) Meetings are fully inclusive and accessible, with adjustments made as necessary so that all members are able	Yes ⊠ No □	Evidence: Payments of childcare	Action needed:
to attend and participate.	Comments:  Any requests for support are	invoices.	By whom:
	positively responded to. Childcare cover given where it is required.		By date:
(6) Where meetings are conducted remotely, arrangements are made and	Yes ⊠ No □	Evidence:  Meetings now held on Skype with appropriate equipment given to any Board Members requiring it.	Action needed:
support provided so that all members can fully participate and contribute.	Comments:		By whom:
		requiring it.	By date:
(7) There is a policy and procedure setting out how disputes and grievances involving members of the board can be raised and are responded to.	Yes ⊠ No □	Evidence: Disciplinary policy	Action needed:
	Comments:	Code of Conduct  Members Services agreement	By whom:
			By date:



3.9 <b>Board performance, review and learning</b> : the board reviews and seeks to improve its performance.	Yes 🖾	No 🗆	Evidence:	Action needed:
improve its performance.	Comments:			By whom:
				By date:
(1) All boards and committees consider their effectiveness annually and assess how they conduct their business, including their:	Yes 🖾	No 🗆	Evidence: Annual effectiveness review at	Action needed:
	Comments:		Board level.	By whom:
				By date:
(a) Composition, skills, experience and diversity;	Yes 🖾	No 🗆	Evidence: Skills matrix updated with	Action needed:
	Comments:	each change of membership - more than annually.Diversity reported via NFA survey.	By whom:	
			reported via Ni A survey.	By date:
(b) Effectiveness in role-modelling the desired culture, values and behaviours	Yes 🖾	No 🗆	Evidence: Lack of formal actions relating	Action needed:
of the organisation;	Comments:		to Board Members.	By whom:



	The track record of the Board in role modelling the culture, values and behaviours of the organistion has been consistent for many years.		By date:
(c) Governing instruments, delegations, regulations, standing orders, structures,	Yes No No	Evidence: Rules and policies all	Action needed:
systems and other formal documentation as referred to in this code;	Comments:	reviewed every three years	By whom:
			By date:
(d) Timing and frequency of meetings;	Yes ⊠ No □	Evidence:  Meetings set out a year in advance	Action needed:
	Comments: Slight adjustments to timing of		By whom:
	meetings especially committees have been made but only when necessary - pattern of Board meetings is well established as last Thursday of every other month and is therefore known well in advance.		By date:
(e) Format of agendas, quality and scope of papers, minutes and communications;	Yes ⊠ No □	Evidence: Agendas, minutes	Action needed:
	Comments:		By whom:





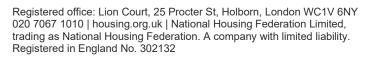
	changes have been made e.g. including Other Options considered. Changes required in 2020 as result of pandemic included making YouTube broadcasts available for public sessions, technological improvements to allow mixed attendance (ie physical and via internet) in the future.		By date:
(f) Effectiveness of decision-making, including how the views and needs of key stakeholders, including residents and other customers, have informed decisions;	Yes No Comments:	Evidence: Lived experienced of tenants and residents is a key feature of the Derby Homes structure with 33% Board members tenants, majority residents on Operational Board, equalities forum and resident surveys and scrutiny through many routes as well as Councillor and MP questions and oversight from the Council.	Action needed:  By whom:  By date:
	Yes No Comments:	Evidence: Board report each May, inclusion of statements in annual accounts	Action needed:  By whom:



(g) Compliance with this code and legal duties.			By date:
(2) These matters are regularly and formally reviewed.	Yes ⊠ No □	Evidence: See above - Board report each September on effectiveness	Action needed:
			By whom:
			By date:
(3) All new board and committee members receive a full induction.	Yes ⊠ No □	Evidence: Induction process and papers	Action needed:
	Comments:		By whom:
			By date:
(4) All members have an agreed programme of ongoing learning and development opportunities, including to address needs identified through the appraisal process.	Yes ⊠ No □	Evidence: Regular training offered	Action needed:
	Comments:	through an annual programme including external speakers	By whom:
			By date:



3.10 <b>Member appraisal</b> : A full, rigorous and documented appraisal process for the individual members of the board and its	Yes □ No ⊠	Evidence:	Action needed: Full process of Board Appraisal
committees, including the chairs, is carried out at least every two years.	Comments: currently non compliant - due last year and postponed		By whom: Board supported by Governance
	during pandemic - requires action to rectify this year		By date: September 2021
(1) The appraisal of the board's chair is led by a senior board member, informed by	Yes □ No ⊠	Evidence:	Action needed:
the views of all board members.	Comments: As above		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 □	Evidence: Code of Conduct	Action needed:
	Comments:	Services Agreement Disciplinary process	By whom:
			By date:
3.11 <b>Compliance with this code</b> : a compliance statement is published with the annual report, with an explanation given for any non-compliance.	Yes ⊠ No □	Evidence: Accounts	Action needed:
	Comments:		By whom:
	Have consistently reported in accounts on 2015 Code and will do for this one		By date:

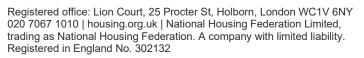




(1) Where the formal constitution of an organisation conflicts with the code, the constitution takes precedence.	Yes ⊠ No □  Comments:	Evidence: Accounts and Board reports	Action needed:  By whom:
	Constituion overrides 9 / 6 year limits.		By date:
(2) Where a statement of non-compliance is needed it sets out:	Yes ⊠ No □	Evidence:	Action needed:
	Comments:		By whom:
			By date:
(a) The reasons for non-compliance, and an explanation of how the relevant principle in this code is being upheld; and	Yes No No	Evidence: Accounts and Board reports	Action needed:
	Comments:		By whom:
			By date:
(b) Summary plans for the achievement of compliance, if applicable.	Yes ⊠ No □	Evidence: Accounts and Board reports	Action needed:
	Comments:		By whom:
	Previous reports have not		
	needed this but this year will address any that require improvement especially in new areas of the Code.		By date:



(3) Where an organisation has subsidiaries which have not adopted this code, the reasons for this are given.	Yes No No	Evidence: no subsidiaries	Action needed:
reasons for the are given.	Comments: N/A		By whom:
			By date:
(4) All policies, documents and statements referred to in this code are formally recorded as appropriate and are	Yes ⊠ No □	Evidence: policy reviews	Action needed:
regularly reviewed.	Comments:  Every three years a policy		By whom:
	review is carried out		By date:
Principle 4: Control and assurance			
The board actively manages the risks faced	Yes ⊠ No □	Evidence:	Action needed:
by the organisation, and obtains robust assurance that controls are effective, that		Audit Committee review risk	
plans and compliance obligations are being delivered, and that the organisation is	Comments: Well established processes,	registers each year and recommend approval to Board	By whom:
financially viable.	refined to align with Council approach last year, training carried out on risk appetite with external body.		By date:
Compliance: from principle to practice			
4.1 <b>Audit</b> : the board has formal and transparent arrangements ensuring that the	Yes ⊠ No □	Evidence: External Auditors and EA	Action needed:





organisation is financially viable and maintains both a sound system of internal	Comments:	contract in place.	By whom:
audit and controls and an appropriate relationship with its external auditors.			By date:
(1) The board can have confidence in the information it receives and there are robust	Yes No No	Evidence: CMAP deliver internal audit.	Action needed:
internal controls and systems for business and control assurance in place which are reviewed annually.	Comments: Improvements on data?	council performance team check performance statistics	By whom:
		Housemark reports each year	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 No	Evidence: Audit committee	Action needed:
	Comments:	AC agendas and minutes	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 □	Evidence:  BDO appointed on 6 year contract to 2022[check]	Action needed:
	Comments:		By whom:
			By date:
4.2 <b>Audit committee</b> : a committee exercises independent scrutiny and	Yes ⊠ No □	Evidence: Existence of AC, appropriate	Action needed:
challenge to provide the board with assurance.	Comments:	Membership, extension to OB members.	By whom:

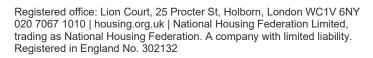
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			By date:
(1) The committee responsible for audit meets regularly and its minutes are available to the board.	Yes ⊠ No □	Evidence:  Meets three times a year  Report by AC chair to each	Action needed:
	Comments:	following board meeting. Minutes attached.	By whom:
			By date:
(2) The committee exercises oversight of the internal and external audit functions.	Yes ⊠ No □	Evidence: Appointment of both made by AC and challenges to either	Action needed:
	Comments:		By whom:
			By date:
(3) The committee annually meets with the external auditors with only non-	Yes ⊠ No □	Evidence: Requirement at least once a	Action needed:
executives present.	Comments:	year - and usually at each meeting.	By whom:
			By date:
(4) The chair of the committee is a member of the board and regularly reports to it.	Yes No No	Evidence:  AC chair is a member of the	Action needed:

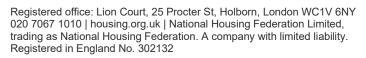


	Comments:	Board	By whom:
			By date:
(5) The membership of the committee includes at least one person with recent and relevant financial experience, proportionate	Yes ⊠ No □	Evidence: Limited financial experience in	Action needed:
to the size and complexity of the organisation.	Comments: Commensurate with the size	the membership but does include both former Chief	By whom:
organisation.	and complexity of the organisation and the limited number of members, the Board has adequate financial experience.	Executive and Member of Council's audit committee, so not directly financial but indirect experience especially for audit. professional support from both officers and auditors.	By date:
4.3 <b>Risk</b> : the board retains ultimate responsibility for risk management and	Yes ⊠ No □	Evidence: Approves registers annually after scrutiny by AC. Regular reports updating the position.	Action needed:
ensures that appropriate risk management arrangements are in place.	Comments:		By whom:
			By date:
(1) The board may delegate the detailed scrutiny and evaluation of risk to a committee.	Yes ⊠ No □	Evidence: AC delegated scrutiny role	Action needed:
	Comments:		By whom:
			By date:





(2) The board has a suitable risk management framework in place; it understands the organisation's risk profile and the effectiveness of key	Yes No Comments:	Evidence: Risk registers - Strategic and Operational- includes mitigations and controls as	Action needed:  By whom:
controls.	check previous	well as appetite	By date:
(3) The board establishes and documents its appetite for the risks the organisation	Yes ⊠ No □	Evidence: Risk registers - Strategic and	Action needed:
faces in pursuit of its strategy.	Comments:	Operational	By whom:
			By date:
(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 □	Evidence: BCP	Action needed:
	Comments: BCP has been reviewed over		By whom:
	last year at officer level		By date:
(5) The board includes members with skills and experience appropriate to the level and type of risks faced by the organisation.	Yes ⊠ No □	Evidence: Background of independent	Action needed:
	Comments: Balance is good considering	members varied but includes direct housing management and also senior leadership	By whom:
	size and scale of risks being faced.	roles in previous careers	By date:





(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 □	Evidence: Quarterly reports on risk registers	Action needed:
	Comments: No subsidiaries		By whom:
			By date:
(7) The board regularly participates in stress-testing of 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 □	Evidence: Budget reports	Action needed:
	Comments: Stress testing for 2% loss of income / additional spending used in budget setting		By whom:
			By date:
(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 ⊠ No □	Evidence: Accounts	Action needed:
	Comments: Statement covers risk		By whom:
	management approach and its application for many years.		By date:
4.4 <b>Compliance</b> : 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.	Yes ⊠ No □	Evidence: Scheme of delegations	Action needed:
	Comments:	Accounts	By whom:
			By date:



(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 Comments:	Evidence:  CMAP and Performance reports independent of DH	Action needed:  By whom:
			By date:
(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 □	Evidence: Board reports on H&S compliance	Action needed:
	Comments:		By whom:
			By date:
(3) The board publishes an annual statement setting out its approach to compliance and internal control.	Yes ⊠ No □	Evidence: Statement of internal control approved through Audit Committee and Board	Action needed:
	Comments: check previous?		By whom:
			By date:
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 non-executive member of	Yes □ No ⊠	Evidence: Whistleblowing policy and advice line independent of the company	Action needed: Clarify role of Chair of Governance to take lead on all whistleblowing.
	Comments:		By whom: Board





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.	Whistleblowing usually to Company Secretary and/ or Chair - if about either then also possible to the Chair of Governance.		By date: May 2021
(1) The board ensures that appropriate whistleblowing policies and procedures are in place.	Yes No No	Evidence: Whistleblowing policy and	Action needed:
	Comments:	independent reporting	By whom:
			By date:
(2) The board (or an appropriate committee) regularly receives an account of matters raised under these policies, and actions taken in response.	Yes □ No ⊠	Evidence:	Action needed: Annual Report on whistleblowing required to Governance Commitee
	Comments:  This is a new idea which should be actioned - not currently compliant but will instigate		By whom: Company Secretary
			By date: May 2021( for 2020)
(3) If a board member has concerns about the board or the organisation that	Yes ⊠ No □	Evidence:  None - not happened to date	Action needed:



cannot be resolved, these concerns are shared with the board and formally	Comments:	By whom:
recorded.		By date:

This table was prepared by consultancy Campbell Tickell for the National Housing Federation. See <a href="https://www.campbelltickell.com">www.campbelltickell.com</a> for further information.

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