



Code of Conduct

Compliance Statement

2023 - 2024

Contents

Foreword from the Chair.....	3
Progress against the 2023-2024 Action Plan.....	4
Part I - Acting in the best interests of the Housing Association.....	5
Part II - Behaving with Integrity	6
Part III - Conducting yourself professionally and treating others well	8
Part IV - Protecting yourself, other people and the environment	11
Appendix A - Evidence List.....	12
Appendix B - Continuous Improvement: Action Plan 2024- 2025.....	14

Foreword from the Chair

I am pleased to introduce our second statement of compliance which outlines how we adhere to the requirements of the NHF Code of Conduct 2022.

The Code of Conduct is an accompanying document to the NHF Code of Governance and was formally adopted by Great Places Housing Group Board in June 2022. The Board and Leadership at Great Places having ensured that we met the requirements in the first year have continued to ensure we are compliant and are able to demonstrate this in our policies and processes. This has included progressing the actions published in last year's statement and identifying further actions for improvement going forward.

This self-assessment statement is a brief summary of our compliance with the Code overall and how we demonstrate this against each of the four parts of the Code. We have included a short description of how we meet the key requirements, along with a list of evidence that we hold and some actions for improvement that we have identified going forward. This is not an exhaustive list, but is merely included to give a sense of the policies, processes and documents we have in place to assure our colleagues, customers and stakeholders that we are compliant with the Code of Conduct, but are also always striving to improve and do better.

It has been an exciting year for Great Places. Following our decision not to proceed with the merger with MSV, we continued to establish and recruit our new Customer Committee which went live in February 2024. Our Chair and Cube Chair stood down after 10 years in post along with two other non-executive directors from Group and Cube Board respectively. I was delighted to be appointed as Chair of the Board, taking over from 1st January 2024 and following an intensive recruitment process we appointed four new non-executives to Group Board and two new non-executives to Cube Board. This has brought a new wealth of talent and experience to the Board and has addressed the skills gaps created by our departing NEDs.

Furthermore, our Chief Executive, Matt Harrison, also announced his decision to stand down in June 2024; and I am looking forward to working with the new Chief Executive, Alison Dean, who was promoted following a robust recruitment exercise, to ensure that we continue to ensure the highest standards of probity.

I would like to thank the Board and colleagues at Great Places for ensuring that not only are we compliant, but that we can also demonstrate compliance, with the Code.



Mervyn Jones,
Chair of Great Places Housing Group

Progress against the 2023-2024 Action Plan

Of the 11 actions we committed to delivering last year only one was not delivered, with most being achieved or partially achieved. Many of the actions were merger-related, but we have nevertheless made progress against those actions despite the merger not going ahead. Progress against all 11 actions is shown below, with the Number column being RAG rated to show whether this has been achieved or not.

No.	Action	Progress
1	The People Team will refresh role profiles throughout 2023-2024 to ensure these are clearer and more accessible for candidates.	This was rolled out within the year and role profiles were simplified to ensure they were more accessible.
2	The new Great Places Board to undertake EDI Training on 'conscious inclusion' in 23-24.	This activity was not delivered in year due to the issues surrounding the merger. Now that a new complement of Board Members have been recruited, this will be tabled for 24-25.
3	People Directorate to look at refreshing the EDI Strategy and Objectives in 2023-24.	A refresh of the EDI strategy and objectives was taken to Board in May 2024, therefore this work is underway although slightly behind schedule due to merger delays (as this was originally intended to be a joint piece of work).
4	Ensure we are prepared and ready for the Access to Information provisions which are being proposed by the Government.	There still haven't been any firm proposals released by the Government on this, although they are expected. Therefore this action will carry over to next year.
5	Ensure continued briefings throughout the year to ensure all colleagues are aware of Great Places policies and their obligations regarding fraud, bribery and money laundering under the legislation.	This continues to happen on an ongoing basis and the e-learning refreshers continue to feature as part of mandatory learning on The Study.
6	Ensure that all colleagues and Non-Executive Directors complete their annual update of Conflicts of Interest.	This is still an annual requirement and is published on line for NEDs as per the Code of Governance requirement.
7	Ensure colleagues are reminder on a six-monthly basis of the Speak Up (Whistleblowing) policy and procedure.	These reminders continue to appear regularly on HOME to remind people of the process and procedure.
8	Maintain a focus on cultural integration post-merger	Despite the merger not proceeding, the Board continues to focus strongly on articulating and monitoring culture, particularly given the changes in senior leadership.
9	Gather information on the professional qualifications gained by colleagues	This work has been undertaken throughout the year and captured on Cascade to inform the requirements for the new professionalisation agenda.
10	Develop a programme of activity for Great Places colleagues in line with the professionalisation agenda requirements for qualifications.	This is an ongoing piece of work as the requirements were not released in detail until late 2023-2024.
11	Pursue ISO 45003 accreditation on Psychological Health and Safety at Work.	We are in the process of delivering the training to create the framework to demonstrate how we meet the accreditation criteria. We should be in a position to apply for assessment and certification by the end of the calendar year.

Part I – Acting in the best interests of the Housing Association and its residents

This section explains how both the Great Places Board and colleagues carry out their duties in line with the organisations social purpose and vision. This includes demonstrating that work activities are carried out in the best interest of Great Places, but also ensuring that behaviours and attitudes are congruous with the values of the organisation.

Meeting our responsibilities

Great Places has a strong vision and values in place which are well embedded and understood by our colleagues. All colleagues receive a full induction and ongoing supervision, using the new Great Conversations approach to encourage frank and open dialogue to support effective performance management.

Strategies, policies and procedures are in place to ensure that we meet our obligations relating to equality, diversity and inclusion, health and safety and managing conflicts of interest. This includes robust safeguarding policies and procedures which are in place to ensure we have safe working practices in place which identify safeguarding concerns and ensure appropriate action is taken in order to safeguard the wellbeing of children and adults at risk who are connected to Great Places. We have also undertaken significant work to understand the demographics of our customer base, primarily through capturing this information in our case management system and the set up of the new Inclusive Services team who are carrying out this work.

Furthermore, all colleagues have robust contract of employment which makes clear the requirements and expectations of them in their role. Board Members have a Deed of Appointment which sets out their terms and conditions, including managing any potential conflicts of interest and the principles of collective decision making and corporate responsibility. This Deed was updated in 2023-2024 and has been used for the 6 new NEDs as well as existing ones.

Representing the Housing Association

Strong reputation management is important to Great Places and our Board and colleagues are required in their contract and deed of appointment to uphold and promote our values, objectives and policies.

All colleagues are required to adhere to policies which govern how they represent themselves and their connection to Great Places and this was further enhanced in our Deed last year. This includes policies on social media use as well as the acceptable use of systems and IT. Our colleagues are ambassadors for the organisation and there is an expectation that they represent us with professionalism and that they do not compromise our reputation or bring us into disrepute.

To support this the Executive Team and Directors have received media training and the Board have been provided with tailored guidance on handling media enquiries and the correct course of action.

Part II – Behaving with Integrity

This section explains how the Great Places Board approaches ensuring the highest standards of integrity across the organisation. Our Probity Policy and associated policies are reserved to the Board for approval and both the Board and Audit and Assurance Committee have oversight of these areas. Avoiding conflicts of interest is emphasised to all colleagues across Great Places and there are a number of processes in place to enforce this. This part also explains our approach to confidentiality and data protection, as well as supporting people to report non-compliance, including whistleblowing.

Conflicts of Interest

Conflicts of Interests and maintaining an overview of this is well embedded at Board Level. In line with the NHF Code of Governance, all Board members declarations of interest are published on our website and is updated frequently as these potential conflicts change. Board Members (and all colleagues) are required to do an annual update as a minimum, but are also encouraged to declare new conflicts and potential conflicts at every meeting as well as between meetings. The rules governing our Declarations of Interest can be found in our Probity Policy which comprehensively outlines the rules regarding managing and reporting conflicts. All Declarations are held centrally on the Cascade HR system.

Anti-Fraud, Bribery, Gifts and Hospitality

The Probity Policy also details our approach to Gifts and Hospitality. This includes setting limits on what can be accepted and what can be refused; as well as when gifts and hospitality have to be declared and approved by the relevant senior managers. Great Places maintains a Register of Gifts and Hospitality which is reported annually to the Audit and Assurance Committee to enable them to have oversight of all offers made to colleagues, whether accepted or not.

Policies are also in place regarding anti-fraud, bribery and money laundering, as well as an annual statement of Internal controls and assurance outlines our compliance with the legislation in these areas. This is then included in our year-end Statutory Accounts and reported to our Regulator in our annual Fraud return.

Funds, resources and personal benefit

Ensuring the proper use of the housing association's funds is of paramount importance. Our Great Value group maintains oversight of high-value contracts and procurement processes ensuring that conflicts are minimised and that funds are directed in the most cost-effective way. All buyers and approvers at Great Places are restricted to purchasing and sign-off within our Schedules of Delegated Authority and our financial control processes are regularly subject to internal audits.

Great Places has in place clear expenses and remuneration policies for both colleagues and Board Members which are updated regularly. Again, all expenses have to be signed off through an online system by an approver.

Confidentiality

Contracts and Deeds of Appointment make clear that colleagues will have access to, and be entrusted with, information about the Group and are required both during and after their employment to treat this information confidentially. GDPR and Data Protection training is mandatory for all colleagues at induction with regular refresher training and this includes making colleagues aware of how to identify requests for access to personal information (Subject Access Requests). This year we appointed a new Data Protection Manager to help further embed a robust approach to data protection and governance. Our Head of Business Assurance has also become a practitioner on Freedom of Information which will support with the new Access to Information provisions which are likely to be introduced.

Policies are also in place which cover how colleagues are expected to communicate using social media where they can be identified as working for Great Places. Further training and support has been provided on handling media enquiries to the Executive Team, Directors and Board and the proper processes to follow.

To remain compliant with legislation, we also put in place Information Sharing Agreements and Data Processing agreements with our partners. These help make clear the standards expected of all the parties involved and ensured that we are clear about our roles and responsibilities.

Reporting Concerns

All colleagues are encouraged to have open and frank discussions with their line managers and direct reports using our Great Conversations approach which was rolled out in 2022-2023. This includes both discussions about work, learning and development as well as concerns, issues and grievances – with the aim of being able to deal with matters as and when they arise.

For colleagues who feel that their concerns have not been handled appropriately, or where these concerns are sufficiently serious – there is a Speak Up (Whistleblowing) policy in place which enables them to report issues confidentially to be handled by a senior member of staff or the Chair of the Audit and Assurance Committee. This was reviewed and signed off by the Board in March 2023.

Part III – Conducting yourself professionally and treating others well

This section explains how Great Places Board ensures that people and the way they work is aligned to the desired operating culture. This includes how people work sensitively, professionally and respectfully with their colleagues, customers and wider stakeholders as well as how they manage their own performance, learning and development.

Respect for others

Ensuring that we work in a way which shows respect and consideration for our colleagues, customers and wider stakeholders is crucial. Great Places has a strong set of operating principles and values in place which make clear what we ask of our colleagues and what people can expect from us.

These cultural pillars are supported by our Dignity at Work Policy which guides how we create a workplace environment which encourages respect and acceptance. Our Equality, Diversity and Inclusion Strategy demonstrates the steps we are taking to improve our approach with both customers and colleagues.

We have also encouraged colleagues to share information about their protected characteristics and support needs via the You Share We Shape campaign, whilst undertaking an exercise to do the same for customers – to ensure that the workplace and customer offers are tailored to those needs.

At a corporate level we have engaged in the BOOST! Programme aimed at exploring and removing the barriers from black, Asian and other colleagues from diverse backgrounds progressing into senior leadership and management roles. Similarly we are also working with Connectives and sponsoring their 'Positively Governing' programme to encourage people from diverse background to be trained and enter into non-executive positions.

Working with residents and other customers

Working respectfully with customers is core to our values. This includes how we interact with customers and live the customer service principles within our Customer Experience strategy, but also how our colleagues respond to issues and challenges that our customers may be facing as individuals. This can include, but is not limited to, issues experienced around cost of living, property condition, mental health and accessing services. One of the overarching approaches to how we work with customers is a 'with not for' attitude, supporting customers with respect and empathy and enabling them to be as independent as possible.

To make this happen, we work with our colleagues to ensure the right development, training and support is in place to ensure they have the right skills and behaviours to work in a way that puts customers front and centre. Recruitment and retention of good people is a key area of focus – to allow consistent delivery of quality services and the ability to build and maintain customer relationships. Rewarding and recognising respectful and outstanding customer service and recruiting customers is part of our approach.

We ensure our processes and ways of working identify and support a responsive approach to what customers need. We are continuing to capture profiling data around our customers and identify how services need to be tailored, aligned to customer information, needs and preferences. As an organisation we want to ensure our colleagues deliver the right services to all our customers, whatever their circumstances or backgrounds, and ensure we break down any barriers to accessing services. We also focus strongly on engagement to ensure diverse and representative customer voices are prominent.

We monitor how we are doing via customer feedback and performance measures and gather feedback in a number of ways including via complaints, surveys and our online digital platform “Our Voice”. We are working to establish a stronger customer voice model and will explore as part of this how we deliver community based hubs, in line with the recently published Better Social Housing Review.

This year has seen a really exciting change in that the Board approved the formation of a new Customer Committee as part of the formal governance structure. This committee is chaired by Patrick Ricketts (one of our Non-Executive Directors) and in late 2023 six customers were appointed to the Committee with the first meeting being held in February 2024. We have already seen a strong level of scrutiny and engagement from the committee and they have also taken part in other activities including the recruitment of the new Chief Executive.

We also continue to work closely with our customer scrutiny group - Insight – who are engaged by our Board on an ongoing basis to carry out deep-dives into areas of customer service and to feed back where we are doing well and what needs improvement. Ensuring they access the Board regularly ensures that their findings are relayed to the highest level. This is just one example of customer engagement at Great Places; surveys, consultations, our digital platform, community investment work as well as the work of our customer complaints and feedback team all help contribute to our understanding of our customers and how we can continue to improve.

Our aim is to work with customers as partners, building relationships and a strong voice across our regions and involving customers in issues that matter to them. The Tenant Satisfaction Measures (TSMs) introduced in April 2023 mean that we will regularly gather satisfaction data across a range of services. In particular the questionnaire will ask about how we are listening and acting on views and whether we are treating customers fairly and with respect. Based on feedback we will consider areas for improvement. We will also communicate what we are doing in this regard with our customers via a range of means including via colleague interactions, our website and social media channels and newsletters. The TSMs will form part of our regular reporting suite to Board and some will be embedded as our high-priority ‘Signals for Success’.

Our Probity Policy again outlines what we can and cannot do in our interactions with our customers, ensuring that our engagement with them is above-board and within the scope of our professional boundaries. This includes ensuring there is no undue influence exerted either by colleagues or by customers as part of that ongoing relationship. Specific policies are in place relating to handling customer finances to minimise any scope for actual or alleged fraud.

Professional Relationships

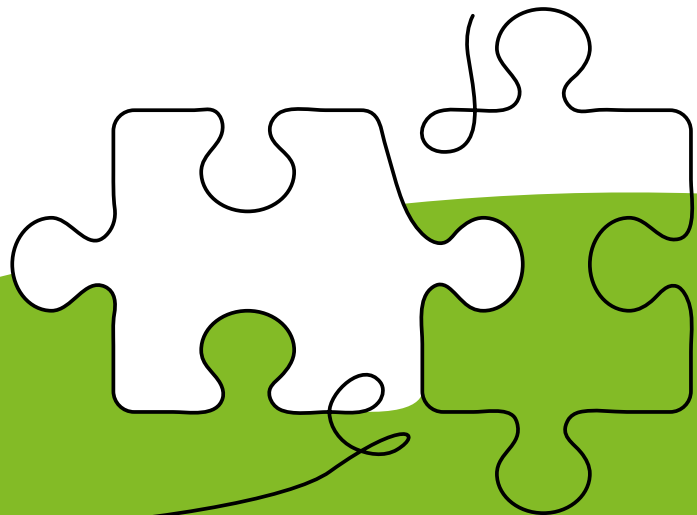
Our Probity Policy includes a section on conduct, including maintaining professional relationships between Board Members, colleagues and customers, as well as how we professionally represent Great Places. Additional guidance is also in place to govern these relationships including the duty of candour on colleagues when reporting matters to the Board to ensure they are provided with timely and accurate information. Delegations of Authority make clear the reporting lines for colleagues to avoid any issues with Board Members.

Learning and Development

All colleagues at Great Places go through a robust induction and have access to our online Learning and Development portal – The Study. This, along with the in-person training, provides access to e-learning and key induction information as well as other courses and opportunities. Funding is available centrally for attendance at external courses and conferences, as well as a training fund for colleagues wishing to undertake qualifications where there is mutual benefit. An internal programme of development training is also in place to ensure strong succession planning across the organisation. Apprentices and Graduates are recruited through the 'Growing Greatness' programme to help ensure a strong and diverse pipeline of colleagues and these have been hugely successful in terms of interest and for those progressing to full-time employment. These programmes are all underpinned by options and opportunities being identified through Great Conversations by colleagues themselves. The Remuneration and Appraisal Committee maintain oversight of learning and development as part of their remit to monitor turnover and the overall colleague offer.

There is also a strong Board appraisal process in place to enable Board Members to identify areas for development or improvement, as well as to challenge and review their peers. Learning and Development needs are met either through shadowing within the organisation, conferences, courses, memberships to external bodies or training delivered as 'topic sessions' to the Board.

In 2024-2025 we also intend to launch a new range of leadership initiatives at all levels of the organisation to support with achieving the requirements of the professionalisation agenda.



Part IV – Protecting yourself, other people and the environment

This section explains how Great Places approaches control and assurance; ensuring that there is sufficient oversight of operational performance, risk management and audit processes to be able to state in statutory accounts and reports that the organisation adheres to all relevant standards, codes and legislation.

Health, Safety and Security

Great Places is fully committed to the protection of the health, safety and welfare of our colleagues, members of the public and suppliers. We achieve this through having robust policies and processes in place to facilitate the reporting of, and learning from, accidents, incidents and near misses, as well as connected policies which include lone working and the provision of devices and systems to keep our colleagues safe. In 2023 we procured the new 'Assure' health and safety management system to better to support our practice in these areas and colleagues are actively encouraged to report issues to enable us to improve health and safety practice and make adjustments and repairs as required. We are also doing everything within our control to ensure the personal and psychological safety of our colleagues.

In addition, we have a strong safeguarding policy in place to ensure the safety of colleagues and customers. Part of this includes carrying out enhanced DBS checks against a list of specific roles as part of our safeguarding management process. In 2024-2025, we are introducing basic DBS checks on all colleagues who have direct contact with customers.

Where there is non-compliance, colleagues are able to report this directly – or if they don't feel comfortable doing so – they can use the Speak Up (Whistleblowing) Policy to do so in a confidential manner.

Protecting the environment

Great Places, like many housing associations, are working hard on the net-zero carbon agenda and have committed to an ongoing programme of Carbon Literacy training for our Executive, Directors and senior leaders. Examples include the Board achieving carbon literacy certificates as well as the organisation introduced a salary sacrifice 'green car' benefit, enabling colleagues to access a scheme whereby they can lease a hybrid or electric car.

All Development appraisals include sections on environmental impact and there has been significant investment in environmental improvement work across our neighbourhoods. Some of our key ambitions in this area is to achieve EPC-C for all properties by 2028-2029, optimise the efficiency of our existing heat networks and to engage with government initiatives to support housing providers to help reduce the carbon footprint of our homes.

Appendix A - Evidence List

This is a list which gives examples of the type of evidence used throughout the self-assessment and audit processes which supported Great Places to demonstrate compliance with the NHF Code of Governance.

No.	Document	Purpose
1	Anti Fraud (incorporating anti bribery) Policy	This is our policy on preventing and responding to actual or near miss fraudulent activity.
2	Anti money laundering Policy	This is our policy on responding to and reporting money laundering.
3	Appraisal Process / NED Appraisal Process	This is the process in place for the appraisals of colleagues as well as a parallel process for Non-Executive Directors and the Chief Executive Officer.
4	Bullying and Harassment Policy	Our Bullying and Harassment Policy outlines the guidance surrounding discussing concerns of work-related bullying or harassment.
5	Carbon Management Strategy and Carbon Literacy Training	This strategy sets out Great Places approach to reducing our carbon footprint in our customers homes, our offices and educating our staff and Board about carbon management.
6	Code of Governance	This is the Great Places Code of Governance, which covers all aspects of the group and is based on the NHF Code of Governance 2020.
7	Contracts and Deeds of Appointment	These are the contractual arrangements with colleagues and Non-Executive Directors which set out the expectations of them as employees and representatives of Great Places and the policies which they are expected to comply with.
8	Corporate Induction	This is the process by which colleagues are inducted to the business, meeting key Executive and Directors, learning about the business, standards, performance and policies and procedures which they are required to follow. A similar induction process exists for NEDs.
9	Corporate Plan, Operating Culture and Values	These are the key documents and hallmarks of how the organisation operates: what we want to achieve, how we want to achieve it and the value base within which we work.
10	Customer Experience Strategy	This strategy is about how services are accessed and delivered and the overall experience of living in a Great Places home. It covers all services provided
11	Customer Scrutiny Group (Insight)	This is our customer-led group (with support) who work to check our performance when delivering services to our customers.
12	Customer Voice Strategy	This Strategy sets out how the customer voice will be captured, how we will learn from it and implement service improvement based on customer feedback over a three year period.
13	Data Protection Policy	This sets out the Groups' approach to data protection, information handling and compliance with GDPR-UK and the Data Protection Act 2018.
14	Dignity at Work Policy	HR to summarise the purpose of this and what it includes
15	EDI Strategy and Action Plan	Our EDI Strategy sets our approach to Equality, Diversity and Inclusion and outlines the commitments we have agreed to make to improve. The Strategy is available on our website .
16	Equality Impact Assessments	These are carried out on policies, strategies and projects to determine whether there is any adverse (or positive) impact on any group with protected characteristics or more broadly.

No.	Document	Purpose
17	Expenses Policy and NED Expenses Policies	These policies set out the associations approach to reimbursing expenses for colleagues as well as a separate policy for NEDs.
18	Great Conversations	This is Great Places' approach to having meaningful 1-2-1's, performance discussions and constructive challenge with colleagues.
19	Great Value	This is our approach to ensuring fair and robust recruitment and that we use the associations funds in the best way securing value for money.
20	Grievance and Disciplinary Policies	This new merged policy is due to be approved in Quarter 2 of 2023-2024.
21	Performance Capability Policy	This policy outlines the support we will provide to colleagues who may not be performing to the expected standards for their role.
22	Probity Policy	This policy covers declarations and conflicts of interest, hospitality and gift declaration and a range of other probity issue including bribery, corruption and favours. This is read in conjunction with other policies.
23	Recruitment Process	This processes outlines our approach to recruitment including gaining authority to recruit, use of the Hireful system and guides to the interview process.
24	Reputation Strategy	The strategy exists and is being updated and is due to be approved in Quarter 2 of 2023-2024.
25	Safeguarding Policy	This policy highlights safe working practices for identifying safeguarding concerns, so that appropriate action can be taken to safeguard the wellbeing of children or adults at risk, who reside in Great Places properties or are engaged in services delivered by Great Places.
26	Schedule of Reserved Matters and Delegations (including financial delegations)	These are schedules which identify those matters reserved to the Board and Shareholders and delegated to Committees, the CEO and other colleagues. Separate schedules are available for other subjects including growth, assets and financial delegations.
27	Service Delivery Framework	Our Service Delivery Framework booklets set a vision for service and customer relationships and define the 2-way responsibilities and expectations required to form the foundations of sustainable tenancies.
28	Social Media Management Guidance	This is Great Places guidance on corporate handling of social media in order to protect the reputation of the business and support customers.
29	Social Media Policy	This was approved by Directors in May 2023 and has been published.
30	Speak Up (Whistleblowing) policy	The Speak Up (Whistleblowing) Policy is there to encourage colleagues to make us aware of any concerns they may have and the channels available to raise these concerns. This was approved by Board in March 2023.

Appendix B - Continuous Improvement: Action Plan 2024-2025

Whilst we are compliant with the Code, we know that we can keep getting better at what we do and therefore we have committed to the following actions for improvement over the next year. These are a mixture of ongoing measures, new ones – and some which were carried over from the previous year.

No.	Action
1	The Great Places Board to undertake EDI Training on 'conscious inclusion' in 24-25.
2	People Directorate to publish a fully refreshed EDI Strategy and Statement in 24-25 in collaboration with a task and finish group of the Board.
3	Ensure we are prepared and ready for the Access to Information provisions which are being proposed by the Government.
4	Ensure continued briefings throughout the year to ensure all colleagues are aware of Great Places policies and their obligations regarding fraud, bribery and money laundering under the legislation.
5	Ensure colleagues are reminded on a six-monthly basis of the Speak Up (Whistleblowing) policy and procedure.
6	Ensure that all colleagues and Non-Executive Directors complete their annual update of Conflicts of Interest.
7	Continue to collate information on customer and colleagues characteristics and outline how these have shaped or changed service provision.
8	Develop a programme of activity for Great Places colleagues in line with the professionalisation agenda requirements for qualifications which have now been released.
9	Pursue ISO 45003 accreditation on Psychological Health and Safety at Work.
10	Carry out basic DBS checks for customer facing colleagues throughout the year.

