



Code of Governance Compliance Statement 2023 - 2024

Contents

Foreword from the Chair.....	3
Progress against the 2023-2024 Action Plan.....	4
1. Theme One - Mission and Values.....	6
2. Theme Two - Strategy and Delivery.....	9
3. Theme Three - Board Effectiveness.....	12
4. Theme Four - Control and Assurance.....	15
Appendix A - Evidence List.....	16
Appendix B - Continuous Improvement: Action Plan 2024- 2025.....	18

Foreword from the Chair

I am pleased to introduce our third statement of compliance which outlines how we adhere to the requirements of the NHF Code of Governance 2020, with only one area of non-compliance for part of the year which is fully explained in this document.

As always, the Code of Governance uses a ‘comply or explain’ format; however at Great Places we have chosen to ‘comply and explain’, creating greater transparency on how we have met the requirements of the Code across the 4 themes:

- **Mission and Values**
- **Strategy and Delivery**
- **Board Effectiveness**
- **Control and Assurance**

The Board and Leadership at Great Places have continued to work hard to gather evidence throughout the year to demonstrate where we meet the requirements of the Code and are compliant. This has included progressing the actions published in last year’s statement and identifying further actions for improvement going forward, some of which arose from our Triennial review.

This self-assessment statement is a brief summary of our compliance with the Code overall and how we demonstrate this against each of the themes. This year we also explain where we have not met one part of the Code and the reasons for this. We have included a summary of how we meet the key requirements, along with a list of evidence that we hold and some actions for improvement 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.

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 external recruitment exercise, to ensure that we continue to ensure the highest standards of governance.

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



Mervyn Jones,
Chair of Great Places Housing Group

Progress against the 2023-2024 Action Plan

No.	Action	Progress
1	We will continue to build our customer profiling data and extend this to include new customers following the merger.	Whilst the merger did not take place, a new Inclusive Services team was created to help ensure we know our customers, understand additional needs and effectively tailor our services to meet these needs.
2	We will review the Governance structures of the organisation to enhance the customer voice as part of the new larger organisation.	In late 2023, the creation of a new Customer Committee was approved by Board. 6 customers were recruited and the Committee had its first meeting in February 2024 and is already having a positive impact.
3	We will aim to ensure that by October 2024 we are once again compliant with the tenure and renewal section of the Code.	Due to the initial merger delay (and subsequent cancellation) this was not met on time. However Great Places was once again compliant with this provision by 1st January 2024.
4	The Board will review the mission, purpose, vision and values as part of the larger merged organisation.	This was no longer a merger-related activity; however these were all considered and discussed by the Board (including the new Board Members) as part of the development of the new corporate plan.
5	The Board will develop a new corporate plan to reflect the priorities of the larger merged organization	Again, whilst no longer required to consider the merger aspect; the Board were heavily involved in the development of the new corporate plan at both away days. This included significant input also from customers, colleagues and new NEDs.
6	The Board will undertake training on 'Conscious Inclusion' to increase knowledge and awareness of this area of EDI and ensure it is culturally embedded.	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.
7	The Board will work to harmonise the culture within the new organisation and maintain an overview of this through colleague surveys.	The Board continue to focus strongly on culture, ensuring this is articulated in the corporate plan and colleague surveys are still undertaken to monitor impacts on culture, particularly given the changes in leadership.
8	A review will be undertaken of the CEO and Executive contracts and remuneration in the year following the merger	These reviews were undertaken and implemented and further work is being undertaken in 2024 to ensure all Execs are on standardized contracts where possible.

9	The Board and the Remuneration and Appraisal Committee, will oversee the delivery of a new suite of workforce policies delivered by the People Directorate.	The People Directorate have been delivering the new simplified workforce policies – including the “grievance, disciplinary and capability policy”.
10	The Board will nominate a new NED to take responsibility for Health and Safety and another to take responsibility for Complaints at Board-Level.	The CEO who is an Executive Director was nominated as lead for Health and Safety (to be renominated from July 2024) The Chair of the new Customer Committee has taken the role of lead member responsible for Complaints as per the new requirements under the Housing Ombudsman Code.
11	The Board will oversee the development of a new Business Plan to reflect the position of the larger merged organisation.	Whilst no longer merger related – the Board oversaw the development of a new business plan which reflects the changing environment. This is not signed off ‘in year’ and was approved in May 2024 (as standard)
12	The Board will oversee the publication of information about the new Board including their biographies, backgrounds and potential conflicts of interests.	This information is all available on the Great Places website and news items were published announcing the new Board Members along with social media articles on LinkedIn.
13	The Board, advised by the Remuneration and Appraisal Committee, will review the Non-Executive Remuneration pay rates within the year as part of a triennial cycle, ensuring this is proportionate to the size and complexity of the organisation.	This work was completed in year with support from Altair who were recruited to complete this piece of work. Going forward this will move to a biennial review.
14	The Board will oversee our Independent Triennial Governance Review to be carried out in late 2023/early 2024.	This was completed successfully and signed off by the Board in March 2024, with the resulting action plan approved in May 2024. Positively the review found strong governance arrangements across the organisation and the recommendations for improvements are being implemented.
15	The Board will ensure the delivery of identified actions arising as a result of the Due Diligence exercises completed in advance of the merger.	Whilst the merger did not go ahead, many of these actions were implemented and further learning in many areas has been taken from Due Diligence.

1. Theme One - Mission and Values

This section explains how the Great Places Board sets, and actively drives, the organisation’s social purpose, vision and values. It explains how the Board defines the culture of the organisation, ensuring strong resident focus as well as adhering to the key principles of openness, accountability and integrity.

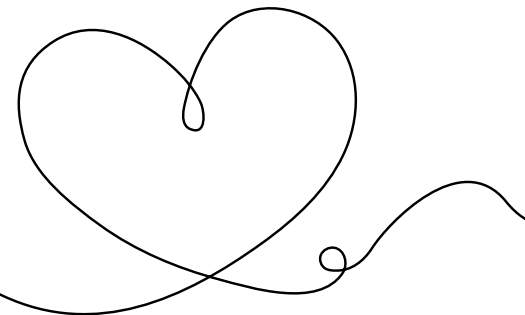
Our Vision, Values, Operating Principles and Culture

2023-2024 saw us implement a one-year corporate plan focused on ‘stability’, ‘collaboration’ and ‘ambition’ as we worked through the merger process. Following the end of merger talks, work commenced to develop a new 3-year plan with engagement from the Board, colleagues and most importantly customers – of whom over 750 engaged with us to tell us what mattered most to them and what their priorities were.

As a result of this, a new corporate plan from 2024-2027 and the three key priorities were agreed which very much reflect our overall vision, in that we want to be:

- Great for our customers
- Great for our homes and communities
- Great for our business

Our vision, values and operating principles remain strong and relevant.



Our Vision

- **Great Homes:** Maximising our investment in safe, sustainable homes
- **Great communities:** Building successful, vibrant communities
- **Great people:** Providing outstanding customer service and support

Our Values

- **We are fair** (fair, open and accountable)
- **We care** (know, respect and care about our customers)
- **We appreciate** (appreciate the effort of everyone who works here)
- **We partner** (promote partnerships, efficiency and value for money)
- **We innovate** (passionately embrace creativity, change and innovation)

We also have a set of clear operating principles. These are the building blocks that we recognise, from a customer, regulatory and financial perspective, we need to do well to achieve the overarching aims of the business.

Operating Principles

- **We protect our financial strength**
- **We exercise good governance**
- **We respect equality, diversity and inclusion**

Resident Focus

Great Places has always placed customers at the heart of decision making and has sought to include the customer voice where possible when making all major decisions. Our Board maintain a focus on customers by receiving regular updates on customer complaints, compliments and focused reports from our customer scrutiny group on specific areas of the business where there is an impact on customers.

This year has seen a really exciting change in that the Board approved the formation of a new standing committee of the Board – the Customer Committee - as part of the formal governance structure. The committee is chaired by Patrick Ricketts (one of our Non-Executive Directors) and in late 2023, 6 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.

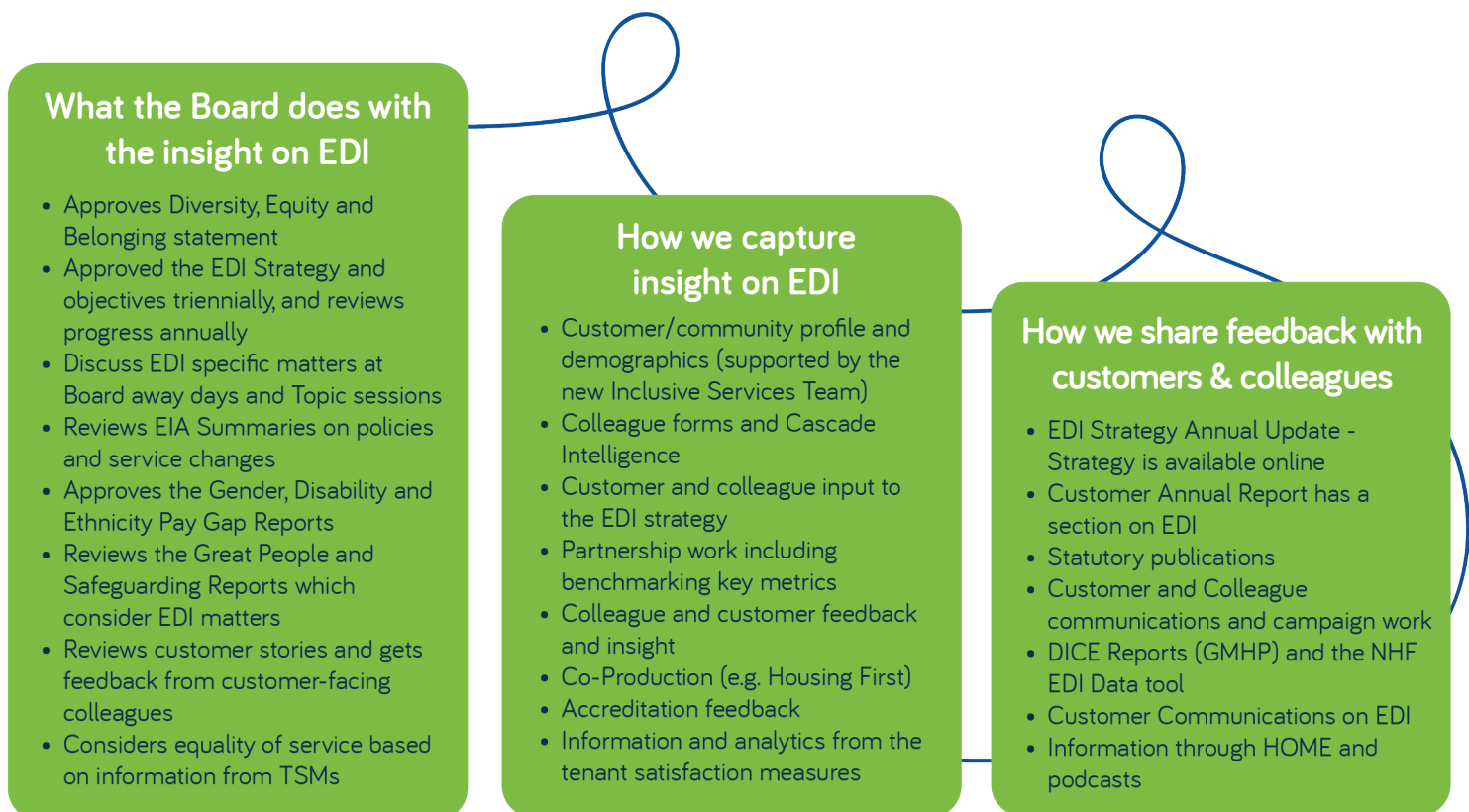
The below diagram shows how we involve residents and customers and get information from them, how the Board gets this information and uses it and finally how we close that feedback loop by sharing the information. The Board actively direct activities within the business based on the feedback it receives.



Equality, Diversity and Inclusion

Great Places has always had a strong focus on Equality, Diversity and Inclusion (EDI) for both our customers colleagues and Board. Key to this is having strong data as a baseline, using different ways to capture insight on EDI and going above and beyond the minimum requirements to ensure we are doing everything possible to use this information to improve where we can. This year we saw the creation of our Inclusive Services team, who are working hard to capture data on our customers to ensure we understand the detailed demographics and needs of our customers, which will better help us tailor our services.

The below diagram demonstrates our approach to insight around EDI



Integrity and Accountability

The Board operates openly and transparently with all colleagues at Great Places, with the full Code of Governance available on our intranet pages. Each year our statutory financial statements and accounts are published as well as our Customer Annual Report which outlines the work that has been undertaken in the previous year.

The Board also welcomes scrutiny on key areas of the business from our Customer Insight Group, who report to the Board directly three times a year. As outlined above, this has been enhanced through the Customer Committee, whose chair sits as a member of the Board and provides a direct link between the committee and the Board.

Information about our Board, who they are and their declarations of interest are all available on the [Great Places website](#).

2. Theme Two - Strategy and Delivery

This section explains how the Great Places Board sets ambitious plans and strategies for the organisation, ensuring that we remain financially viable, are well governed and that they maintain strong oversight of arrangements to achieve this. Great Places is currently a G1/V2 organisation like many others in the sector, but is one of the first providers to undergo a Regulatory Inspection in 2024 which also assesses against the consumer standards – the results of which should be known in the summer.

Strategies, Resources and Plans

Last year we put in place a one-year ‘bridging’ plan focusing on ‘stability’, ‘collaboration’ and ‘ambition’. With the end of merger talks and the appointment of new Board Members, a new Corporate Plan was developed and approved by Board, as well an updated Business Plan which reflects the challenging operating environment.

Chief Executive

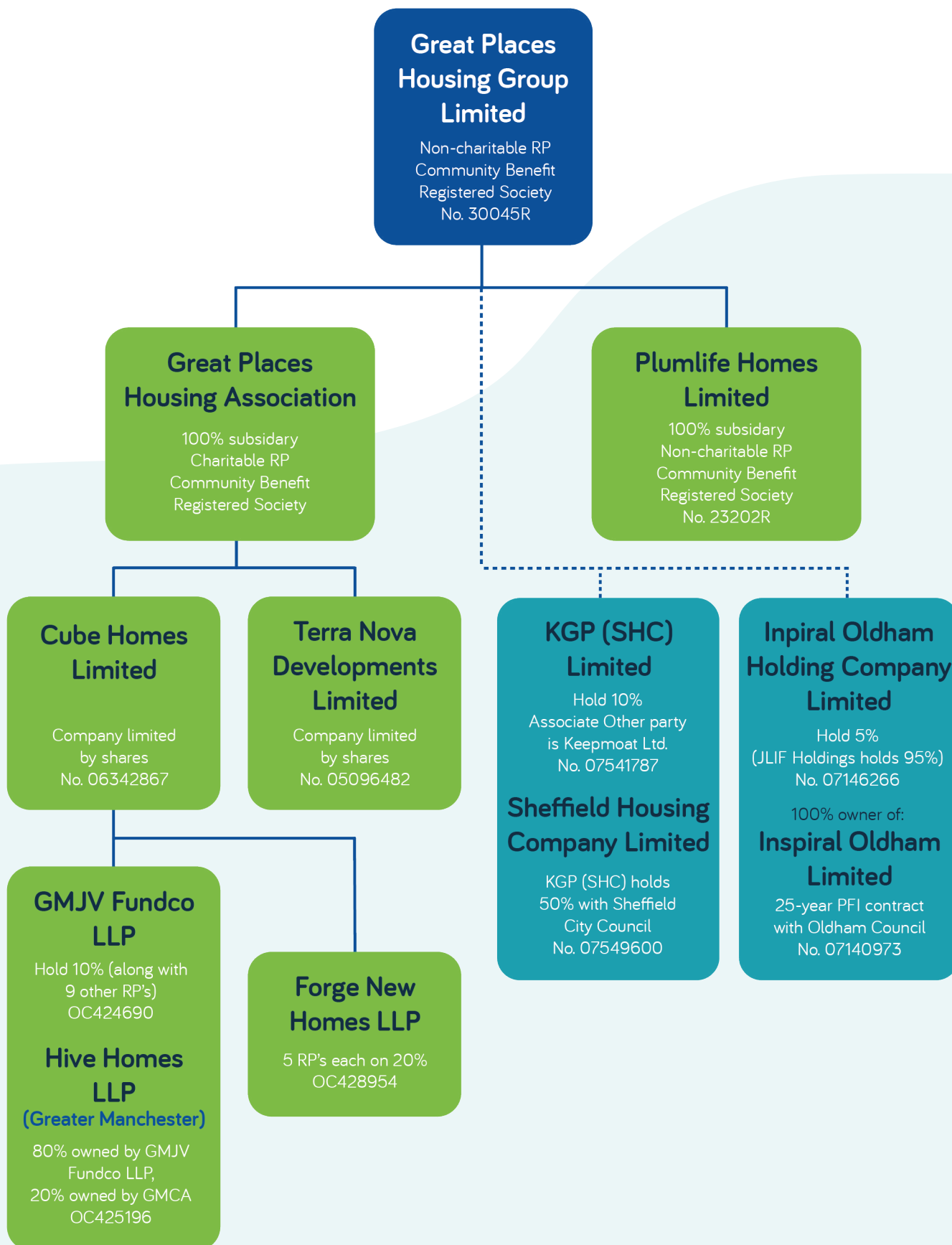
The Code of Governance contains many provisions relating to the Chief Executive who has the delegated authority to oversee and manage the operational delivery of the organisations strategies and plans. These clauses include ensuring that there is a rigorous contract of employment in place, that they are remunerated accordingly, that their role and delegated authority is documented and that they are subject to annual appraisal which is overseen by the Board. Locally we also have a nominated deputy policy in place to ensure the effective running of the organisation in the event of the CEO’s absence. We have reviewed all these provisions and can confirm that we are fully compliant with them all.

Structures, Joint Ventures and Partnerships

Great Places operates with a coterminous Board which represents Great Places Housing Group, Great Places Housing Association, Plumlife Homes and Terra Nova Developments. Cube Homes has a separate Board with GPHA as its main shareholder.

Reviews of our diverse activities and structures are carried out annually and the current structure of Great Places, including reference to our joint ventures (predominately Hive Homes and Forge New Homes), is shown as follows. Following a recommendation from our Triennial Governance Review, we have agreed to enhance this oversight with more regular reporting going forward.

2023-2024 saw some significant change in the leadership of the organisation, with the retirement of our ED Sustainable Assets and Repairs and ED of Finance. A new Chief Financial Officer and Chief Property Officer have since been appointed, as well as a recruitment exercise for the new Chief Executive who will take up post on 1st July 2024.



Workforce

In our independent pulse survey in August 2023, 81% of colleagues were classed as being 'on the pitch', which means answering two questions positively. 'I believe in the vision and work of Great Places' and 'I'm fully motivated to do a great job each and every day'. This is a slight improvement from 80.3% last year and 79.5% in the year before on the same questions. Our strategic direction and priorities, short, medium and long-term are clear, well understood and embedded across the organisation in our Corporate Plan.

The main point of feedback from the workforce was again relating to pay and reward, which is unsurprising given the cost of living crisis and rising inflation throughout 2022-23. Again this year, a benchmarking exercise was carried out and salaries for a significant number of roles were adjusted accordingly. The target driven element of the 'Sharing Greatness' bonus scheme was suspended again and a 7% pay award was made to colleagues across the board in April 2023. The Remuneration and Appraisal Committee played a key part in reviewing the salary position throughout the year.

Performance

The organisation has a large number of performance indicators across the themes of Great Homes, Great People, Great Communities as well as some cross-cutting measures.

11 of these are highlighted as 'Critical Success Factors' – which are high priority measures. These are reviewed and targets set annually by a task and finish group of the Board which is headed by the Board Chair. Examples of the measures including development completions, overall customer satisfaction, sickness absence levels, average re-let times and group surplus. The Board receives reports at each meeting which goes into detail on these performance measures, with a balanced scorecard outlining performance in each area.

Throughout the year, the Board also receive reports from all areas of the business. These are a mixture of Executive reports, strategies, policies, performance updates, topic sessions, risk reports, approvals and information items for consideration. These enable the Board to have both the breadth and depth of information required to manage performance.

Going forward, the Board have agreed to change the Critical Success Factors and re-brand these as 'Signals for Success'. These include some of the retained measures, some slightly amended measures as well as the inclusion of some of the Tenant Satisfaction Measures which are now live. The Board have requested a change to their meetings structure, so that all performance-related information is delivered in one section, enabling them to read-across the data and have full oversight of all metrics and data.



3. Theme Three - Board Effectiveness

This section explains how Great Places assures the effectiveness of our Non-Executive Directors for Group and Cube Homes and that we maintain a skilled, forward-thinking and diverse Board that provides high challenge and high support to our Executive team and colleagues.

Roles, Responsibilities and Functions of the Board and Committees

Our company rules, Memorandum and Articles of Association and enhanced Code of Governance clearly outline the roles, responsibilities and functions of the Board and its three Committees.

Each role including those of Chair, Cube Chair, Committee Chair, Co-Optee and Non-Executive Director has its own role profile which confirms their responsibilities and restrictions on their role.

There are also detailed Schedules of Reserved Matters and Schemes of Delegations which clearly articulate those matters which are solely reserved to the Board (and Shareholders at AGMs). It also identifies those which are delegated to Committees of the Board, the Chief Executive and those which can then be delegated further as part of the operational running of the business. A Scheme of Financial Delegations, Asset Management Delegations and Delegations to support The Homes England Strategic Partnership (2) are also in place to support this.

Committees

There are three standing Committees of the Board: Audit and Assurance, Remuneration and Appraisal and Customer Committee which provide more in-depth scrutiny to specific areas of the business and report these to the Board. These Committees have a Chair who is also a Non-Executive Director of the Board and all three have a terms of reference document which clearly states their responsibilities and reporting lines. Task and Finish Groups are also convened from time-to-time to focus on specific tasks (e.g. Signals for Success, Board Recruitment, Executive Recruitment etc.)

Board Composition, Selection, Appointment and Remuneration

The Board can have up to 12 Members including Executive Members at any time. Board succession is considered regularly by the Remuneration and Appraisal Committee and an annual exercise is undertaken by the Board to identify skills, knowledge and experience which exists on the Board and where there may be gaps to be filled in the future. This was shown to work effectively in 2023-2024 when 6 new Non-Executive Directors were recruited, successfully addressing the skills gaps left by departing members.

Recruitment processes are open, fair and both value and merit-based; and are tailored to ensure that we are recruiting to meet any gaps identified as part of the appraisal process. This could include a particular area of expertise, or to ensure that we recruit those with specific lived experience or where their unique perspective is reflective of our customer base.

The Board of Great Places are remunerated at a fair market rate which is regularly benchmarked and reviewed by external consultants. This exercise was carried out in December 2023 by Altair and Board Remuneration was increased from 1st April 2024 to reflect the market rate. This benchmarking which was previous done every three years will move to a biennial process going forward to ensure that we keep pace with the market. Emoluments are always disclosed as part of the financial reporting each year and are reported to the Remuneration and Appraisal Committee.

Tenure and Renewal – Our single area of Non Compliance Explained

Great Places has a Board Recruitment, Succession and Development Policy which is overseen by the Remuneration and Appraisal Committee and helps maintain oversight of Board tenure and renewal. Between 1st April 2023 and 31st December 2023 Great Places was non-compliant with the provisions of this policy and with the Code of Governance with regards to Board tenure.

The Chair of Group Board and the Chair of Cube Board (Tony Davison and David Robinson) had both exceeded the 9-year maximum limit as of September 2022. Whilst plans had been in place to ensure the recruitment of new Chairs into both of these roles, Great Places was at the time in early discussions regarding the merger and it was agreed that it would be preferable for both Chairs to continue until the merger process was more advanced.

The Chair of Cube stood down in September 2023 and was replaced by Emma Mountford who was also appointed to Group Board. Following the end of merger talks in September, the Chair of the Board announced his decision to stand down in December 2023. Following an internal recruitment process he was succeeded by Mervyn Jones on 1st January 2024, providing continuity and stability within the organisation.

The Regulator was informed of this area of non-compliance and the reasons were explained to them. Positively they indicated no concerns and accepted our rationale for the extended tenure.

As of 1st January 2024 – Great Places was once again compliant with the Code.

Conduct of Business

Great Places conducts all Board and Committee meetings effectively, as endorsed by our G1 rating in the most recent In-Depth Assessment and confirmed in December 2023 following the annual stability check. An annual process for reviewing the effectiveness of not just individuals, but also Board and Committees more generally is conducted; and actions for improvement are acted upon. The annual governance calendar is agreed up to 6 months before year end and an urgency process can be used if decisions are required between meetings. Meeting papers are published in advance giving the Board sufficient time to read them and make comments and observations using the online system. Each meeting also has a standing item allowing the Board to comment on the effectiveness of the meeting, changes to the risk profile resulting from decisions made in the meeting and add suggestions for improvement.

Appraisal, Review and Learning

The Board undertakes a formal, annual review of its performance and effectiveness; and this is supported by a Triennial Review of our Governance arrangements by an external organisation. All Board Members receive an induction to the business, along with ongoing opportunities for learning including topic sessions, away days, access to conferences and events as well as internal opportunities for improving profile and getting to know the business. A comprehensive appraisal process is carried out with peer-review every two years, with a scaled-back version on an annual basis. The results of these are reported back to the Board and an action-plan developed. This year in recognition of the large amount of change in the organisation, an external organisation called 'The Connectives' were appointed to deliver an induction programme to support the new Board understand their dynamics and operate effectively moving forward.

Compliance with the NHF Code of Governance

Our annual financial statements and accounts, as well as Internal Controls Assurance Statements, are the means by which we confirm that we are compliant with the NHF Code of Governance. Our internal process for demonstrating compliance is a rigorous self-assessment against each element of the Code and the collation of an evidence chest which supports our stated compliance and areas where we are required to explain.

Positively we remain compliant with the majority of provisions – with the one exception being tenure and renewal (as explained earlier in this section). This single non-compliance will be fully explained in the financial statements. We have also implemented many of the actions recommended following an internal audit on our compliance with the Code carried out last year.

4. Theme Four - Control and Assurance

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.

Audit, Compliance and the Audit and Assurance Committee

Great Places has a standing Audit and Assurance Committee which meets 5 times a year and has oversight of both internal and external audit, as well as the Great Places internal process for control assurance. The Committee reports regularly to the Board and also holds in-camera meetings with the external auditors at least annually (without any Executive Directors present), but also at each meeting if required (as a standing item).

The Committee has responsibility for reviewing all internal audits throughout the year, as well as considering the effectiveness of internal audit arrangements and the re-procurement of internal audit. This year was the first full year of audit work carried out by BDO who were successfully procured last year. The Committee provides robust challenge to the auditors, as well as to the Executive Team and colleagues where there are concerns or adverse findings and have routinely asked for follow up reports to be provided between scheduled meetings.

The Committee is strongly involved in the annual statutory reporting process, agreeing this timeline with the external auditors and signing off the statements and financial notes and recommending these to Board. This includes all other aspects of assurance including compliance with standards, relevant law, codes of conduct and this Code of Governance, as standard items included in the accounts.

Risk

The Board at Great Places receive Risk Reports throughout the year and maintain overall responsibility for risk management and oversight. The Audit and Assurance Committee also carry out deep dives into specific risks, as well as reviewing and recommending the risk appetite of the organisation before recommending to the Board for approval. As well as oversight of the risk register, we also maintain watch-lists for new and emerging risks and changes in the sector and specific documents also relating to health and safety risks which are a high priority. The Audit and Assurance Committee similarly receive these reports at their meetings throughout the year.

In conjunction with the Finance Team, risks are also considered as part of the annual business planning process as part of carrying out stress testing and developing the mitigations schedule; in assessing what potential risks could 'break' the plan. This has been significantly enhanced this year with multi-variate stresses being considered and these were positively received by the Board and our stakeholders. Alongside the robust business continuity planning at Great Places, these offer us strong resilience to potential risks faced by the organisation.

Whistleblowing

Great Places has a 'Speak Up' Policy which covers our arrangements for whistleblowing and is clear on the process to be followed if anyone has concerns about the conduct of any of our colleagues or Board Members. The Chair of the Audit and Assurance Committee is the designated contact for issues which may require independent investigation, or where people may be uncomfortable escalating to the Chief Executive.

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
1.1	Corporate Plan	This outlines the vision for the organisation.
1.2	Great Places Values	These are the articulated values of the organisation.
1.3	GREATER Operating Culture	This is the stated operating culture of the organisation.
1.4	Insight Scrutiny Reports	These demonstrate resident input and a direct link to the Board.
1.5	Customer Experience Dashboard Reports	These demonstrate resident focus and how the Board have sight of complaints and compliments.
1.6	Customer Experience Strategy	This outlines how we optimise customer experience.
1.7	Customer Voice Strategy	This strategy explains how we gain insight from customers and given them a voice.
1.8	Annual Declarations of Interest report and Register of Interests.	This demonstrates transparency, openness and accountability.
1.9	Shareholders Register	This captures our key shareholders who are invited to AGMs and EGMs as required.
2.1	CEO Nominated Deputy Policy	Demonstrates that there is a robust process in place to ensure continuity in the event of CEO absence.
2.2	Diverse Activities Report (including structure)	Demonstrates that there is constant review of our structures, activities and potential improvements.
2.3	Value for Money Strategy	Demonstrates that we maintain a focus on value for money, efficiency and financial sustainability.
2.4	Carbon Management Strategy	Demonstrates our focus on environmental issues and reaching zero-carbon and improving energy efficiency.
2.5	Social Value summary	Demonstrates our commitment to delivering profit for a purpose and our focus on social sustainability issues facing residents and communities.
2.6	Asset Management Strategy	Demonstrates our commitment to maintaining good homes and continuous improvement of our stock.
2.7	One Voice and Staff Forums	Demonstrates that we involve our workforce, including groups with protected characteristics specifically, to get views, feedback and opinions on the business.
2.8	Pulse Survey Results 2023	Demonstrates our ongoing commitment to understanding how colleagues feel throughout the year and where there is more work to do.
2.9	Scheme of Delegations	Demonstrates the delegated authority to the Chief Executive, as specified in the Code.
2.10	Altair Triennial Governance Review and Board Remuneration review.	Demonstrates that the organisation takes external advice on structures and governance arrangements on a regular basis, as well as ensuring we are keeping pace with the market on Board remuneration.
2.11	Executive Remuneration Policy and Appraisal Policy	Demonstrates that the processes for the appraisal and remuneration of the Chief Executive are formalised in corporate documents.
2.12	Equality, Diversity and Inclusion Strategy	Demonstrates the organisational commitment to EDI which is reflected in our values and corporate priorities.

No.	Document	Purpose
2.13	People Strategy	Demonstrates the organisation's commitment to the workforce, to recruit, retain, develop and support them.
2.14	Balanced Scorecard, KPI's and Critical Success Factors	Demonstrates the processes by which the Executive and Board maintain a strong overview of performance within the organisation, particularly on key measures.
3.1	Code of Governance	Our enhanced Code of Governance supplements the NHF Code with local provisions which govern the specific running of Board and Committees
3.2	Terms of Reference, Schedule of Reserved Matters and Scheme of Delegations	The Terms of Reference for each Committee make clear their functions and powers. The Schedule of Reserved Matters outlines those functions that can only be carried out by Board and the Scheme of Delegations shows those which can be delegated.
3.3	Role Profiles	Each role on the Board has its own profile which confirms their responsibilities and accountabilities.
3.4	Deed of Appointment	The NED Deed of Appointment covers expected behaviours and requirements of the role.
3.5	Board Recruitment, Succession, Development	This explains the Board's approach to managing succession and recruitment, as well as the ongoing development of Members during their tenure.
3.6	Board Appraisal Policy and Process	This Policy explains how the appraisal processes are carried out annually, as well as the in-depth biennial process which includes peer-review.
4.1	Risk Register, Watch List and Deep-Dives	Our risk register and watch list are updated on a dynamic basis to ensure they always remain current. Biannual deep dives into specific risks also take place to give stronger focus to areas of concern. The watch list identifies new and emerging risks to remain on Committee and Boards radar.
4.2	Statutory Accounts	The annual statutory accounts include statements of compliance with the governance and financial viability standards, economic and consumer standards, all relevant law and this code of governance.
4.3	Annual Internal Audit Plan and Quarterly Update Reports	Our annual audit plan is developed based on the audit universe and key areas for scrutiny on a cyclical basis. Quarterly updates are presented to the Committee.
4.4	Independence of External Auditors Policy	This policy ensures that additional work undertaken by External Auditors is permitted by the FRC Ethical Standard and is within agreed financial limits.
4.5	Risk Appetite Statement	Reviewed annually by the Board, the Board considers both our overall risk appetite, as well as individual risk appetite against a number of domains.
4.6	Building Safety Control Action Plan	This regular report to Board and Audit Committee provides ongoing updates on our approach to improving Building Safety.
4.7	Health and Safety Reports	Health and Safety reports to the Board and Exec Team provide ongoing assurance that both colleagues and customers wellbeing are a high priority for Great Places.
4.8	Safeguarding Reports	Biannual Safeguarding reports to the Board provide information on how we safeguarding customers and colleagues, as well as our partnership working with local authorities and other organisations to do so.
4.9	Speak Up Policy	Speak Up is the Great Places policy which covers whistleblowing processes. This is usually read in conjunction with our Probity Policy.
4.10	Probity Policy	This policy covers most areas of probity including declarations of interest, conduct and appropriate relationships and has been enhanced to take account of provisions in the NHF Code of Conduct 2022.

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 internally set actions, as well as some of those recommended by our Triennial Governance Review.

No.	Action
1	We will continue to build our customer profiling data and ensure that the results of this are reported annually to Board.
2	We will ensure that the activities and progress of our subsidiaries and joint ventures are reported with more regularity to Board to ensure robust oversight.
3	The Board will undertake training on 'Conscious Inclusion' to increase knowledge and awareness of this area of EDI and ensure it is culturally embedded.
4	We will carry out a review of the Rules of GPHG, GPHA and Plumlife and update these based on the Model Rules produced by NHF in 2015.
5	We will consider the requirement for further Board recruitment into 2025 and beyond, taking account of diversity, including diversity of thought and ensuring that skills gaps are met.
6	We will carry out a review of the work of the Customer Committee within the first year and ensure that it is operating effectively.
7	We will ensure regular meetings between the Chair, Committee Chairs and Company Secretary between meetings, as well as between the CEO and Company Secretary to ensure effective ongoing governance and horizon scanning.
8	We will ensure that we deliver the Triennial Governance Review Action Plan 2024.
9	We will ensure that the board agenda throughout 2024-2025 covers all the requirements of the new regulatory standards.
10	We will ensure that the Board and Remuneration and Appraisal Committee consider succession planning for Committees and Boards as a result of Board Members tenures coming to an end.

