



Self-Assessment against Adopted Code of Governance for 2023/24

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The Board of STFH has conducted a self-assessment against the NHF Code of Governance at its meeting of 31 July 2024 and was of the view that STFH fully complies with all provisions in the Code. For transparency, the self assessment will be published on the Trust's website.

For each provision in the Code - Green = fully compliant; amber = compliant but processes need strengthening ; red = not compliant. Purple = compliance assessed at Group level by BCHA Board.

1. Mission and Values			
Principle 1			
The board sets and actively drives the organisation’s social purpose, mission, values and ambitions, and through these embeds within the organisation resident focus, inclusion, integrity, openness and accountability.			
Compliance			
1.1 Mission: the board leads the organisation in pursuit of achieving its social purpose. The board sets the organisation’s mission and values, and regularly reviews and reaffirms their relevance.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> Board Terms of Reference Annual Directors’ Report in Financial Statements Board review of objects, mission and values July Board Agendas Focus on affordable housing 	Action needed: - By whom: - By date: -
1.2 Resident Focus: the needs and safety of the organisation’s current and future residents and other customers are placed at the heart of the board’s decision-making.			
(1) There are policies, frameworks and opportunities which enable, encourage and support residents and other customers to engage with, influence and contribute to strategic decision-making.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> Policy statement on Resident Engagement Compliments & Complaints policy Policy on lived experience in Governance Framework 	Action needed: This requires ongoing engagement By whom: By date: -

<p>(2) The board has access to insight into the views and needs of the organisation’s residents and other customers (including insight into their concerns and complaints) and uses this to inform decisions where appropriate.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Board member visits to houses • Monthly Service report • Case studies to Board • Customer Satisfaction surveys conducted by BCHA include samples of STFH residents 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(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 regularly seeks assurance on their operation.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Health and Safety Policy references Resident Focus • Monthly Service report • Fire Safety and other compliance policies • Mandatory Training for all staff on range of issues – H&S, safeguarding, fire safety 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>This is an area where the Board had a briefing in 2023. The performance report will include better information on property safety over 2024.</p>		<p>By whom:</p> <p>-</p>
<p>(4) The organisation regularly reports to its residents on how its commitments to resident focus have been delivered.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • BCHA Tenant News includes information quarterly on Customer Engagement and feedback and complaints. • BCHA Customer Reference Panel meets regularly (no STFH members currently) 	<p>Action needed:</p> <ul style="list-style-type: none"> •
	<p>Comments:</p> <p>This area is developing and is becoming embedded across the Group</p>		<p>By whom:</p> <ul style="list-style-type: none"> •
			<p>By date:</p> <p>-</p>

<p>1.3 Equality, diversity and inclusion: 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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • EDI Group Strategy • STFH EDI policy statement 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>The Board has policy statements in place, supported by the Group</p>		<p>By whom:</p> <p>-</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Monthly Service Reports 	<p>Action needed:</p> <p>Identify EDI priorities/actions for STFH specifically and report</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>Service Manager</p>
<p>(2) The organisation annually publishes information about its work to deliver these commitments and objectives, and the progress it has made.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Gender Pay Gap Report in Group Financial Statements • EDI annual report as part of BCHA Annual Impact Report 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>There is a commitment to ensure that STFH achieves equality, diversity and inclusion goals</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>Over course of 2024</p>
			<p>By date:</p> <p>-</p>

<p>1.4 Culture: The board regularly considers and defines the culture and behaviours that will best enable the organisation to deliver its mission and values.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Vision, Mission, Values affirmed by Board as part of annual Governance review • Group Whistleblowing policy 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(1) The board leads by example and promotes the culture of the organisation.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Board minutes • Board visits to houses to meet staff and residents 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(2) The board seeks regular assurance that its desired culture and behaviours are being enacted in practice in alignment with its mission and values.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Monthly Service reports • Complaints oversight Stage 2 • Board members interaction with staff and customers • Service Manager invited to Board meetings 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

1.5 Integrity: the board, its members and the organisation maintain high standards of probity and conduct.			
(1) The board adopts a formal code of conduct to which all its members adhere.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> Board Code of Conduct (Group) 	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The board has clear policies and procedures for its members to identify, declare, record and manage any actual, potential and perceived conflicts of interest.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> Group Payments, Benefits, Interests Policy Annual Declaration of Interests review at Group level 	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) There is a publicly available register for board and committee member declarations of interest which is reported on annually to the board.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> Annual Declarations report on Website 	Action needed: Upload 23/24 report
	Comments: -		By whom: Gordon Pardy
			By date: 31 July 2024

<p>(4) Where there is a material conflict of interest, any individual concerned withdraws from the board’s discussions and decisions on relevant matters.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Governance Framework • Appointment agreement for each member • Declaration of Interest opportunity in Board agendas 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>Board members are clear about their duties to avoid or declare conflicts of interest</p>		<p>By whom:</p> <p>-</p>
<p>(5) In the case of a fundamental or ongoing material conflict, the board determines whether the person concerned should cease to be a board member.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Payments, Benefits & Interests policy • Governance Framework 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>Not occurred to date</p>		<p>By whom:</p> <p>-</p>
<p>1.6: Accountability: The board operates openly and transparently, and demonstrates accountability to key stakeholders including residents, other customers, and partner statutory bodies.</p>			
<p>(1) The board publishes information annually about the organisation’s activities, performance and plans for future improvements, which is accessible to its key stakeholders and covers the matters referred to in this code.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Annual Financial Statements – website • Website also contains other information of use to stakeholders 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Ongoing PR and Fundraising activity • BCHA Tenant magazine • Ongoing liaison with Wiltshire Council housing team • Website information 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>The main stakeholders for STFH are – residents, applicants, Wiltshire Council, donors and sponsors and partner agencies</p>		<p>By whom:</p> <p>-</p>
<p>(3) Opportunities and information are provided for residents and other customers independently to scrutinise the work of the organisation and to hold it to account, and the board reviews these arrangements regularly to ensure that they remain fit for purpose.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Customer Engagement work at BCHA level across the Group • Board member visits 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(4) The organisation publishes clear and up-to-date information about its board members, committees and governance.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Board page on website • Statement of Board Appointment and Composition 	<p>Action needed:</p> <p>Update website documents</p>
	<p>Comments:</p> <p>Board member profiles are on the website as well as governance documentation</p>		<p>By whom:</p> <p>Gordon Parady</p>
			<p>By date:</p> <p>31 July 2024</p>

<p>(5) The organisation responds in a considered, open and transparent way to requests for information about its work, activities, and decisions made by the board; where it cannot provide certain information, it gives clear reasons as to why this is the case.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Group Request for Information Policy Published Privacy Notice 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <ul style="list-style-type: none"> 		<p>By whom:</p> <p>-</p>
<p>(6) The role of shareholders in the governance of the organisation is documented and understood.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework – closed membership policy 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>The membership list was reviewed in year and primarily now comprises trustees</p>		<p>By whom:</p> <p>-</p>
<p>(7) Organisations with open shareholding publish their policy for the admission of shareholders.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p> <p>-</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>Membership is closed</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

<p>1.7 Reputation and Trust: The board takes into account in its actions and decisions the importance of maintaining trust in the organisation and upholding its reputation.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Board minutes • Board agenda allows consideration of these issues at end of meeting 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

2. Strategy and Delivery			
Principle 2			
The board sets ambitions, plans and strategies which enable the organisation to fulfil its social purpose and remain viable and sustainable, and exercises demonstrable and effective oversight of its delivery.			
Compliance			
2.1 Strategy, resources and plans: The board sets the organisation’s overall direction and strategy in line with its charitable, community benefit or other constitutional purposes.			
<p>(1) The board sets financially sustainable plans to ensure that the organisation has the resources it needs to deliver its strategy.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Board Terms of Reference Group “Golden Rules” – monitor financial viability at BCHA Board level Budget 	<p>Action needed:</p> <p>Board should set/reaffirm strategic priorities for the Trust</p>
	<p>Comments:</p> <p>The Business Plan is in need of review</p>		<p>By whom:</p> <p>Chair</p>
			<p>By date:</p> <p>31 March 2025</p>
<p>(2) The board gives specific consideration in setting such plans to value for money, financial sustainability, carbon neutrality and environmental</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> BCHA Group Strategic Plan includes group wide commitments 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p>		<p>By whom:</p> <p>-</p>

sustainability, and social sustainability.	Environmental and Social Sustainability to be further developed at Group level		By date: -
2.2 Structures: Organisational and governance structures support the delivery of the organisation’s social purpose and strategic objectives.			
(1) Structures are designed to support effective delivery and oversight of strategy, are clearly set out, and are regularly reviewed to ensure they remain fit for purpose.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> Staffing structure comprises 1 manager and a small number of roles sitting beneath that Staff line-managed through BCHA under a Service Level Agreement but Chair routinely maintains contact with staff team and BCHA 	Action needed: -
	Comments: STFH is a small organisation managing 9 supported housing properties		By whom: -
(2) The board considers regularly whether the organisation’s purpose could be better achieved through changes to its group, governance or staffing structures.	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/>		Action needed: -
	Comments:		By whom: -
2.3 Working with others: Within the organisation’s overall corporate strategy (or associated	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence:	Action needed: -

<p>strategies and plans) there is consideration given to whether and how active cooperation, collaboration, joint working or formal partnership with other organisations could enable it to deliver its social purpose and strategies more effectively and economically.</p>	<p>Comments: -</p>	<ul style="list-style-type: none"> • There are no formal collaborative partnerships given size of STFH but we actively work with the Council and other agencies in the City for the benefit of residents • We actively seek corporate sponsorships with local businesses to support our work 	<p>By whom: -</p> <p>By date: -</p>
<p>2.4 The chief executive: The organisation has a chief executive, or equivalent, with the delegated authority to oversee and manage operational delivery of the strategies set by the board.</p>			
<p>(1) The responsibilities of, and delegations to, the chief executive are clearly set out.</p> <p>(2) The chief executive has a formal contract of employment;</p> <p>(3) The chief executive’s remuneration package is set at an appropriate level</p> <p>(4) Severance arrangements are approved by the Board</p> <p>(5) There is a formal process for the CEO’s annual appraisal,</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p> <p>Comments: STFH does not have a CEO – although the Parent Company (BCHA) has</p>	<p>Evidence:</p>	<p>Action needed: -</p> <p>By whom: -</p> <p>By date: -</p>
<p>2.5 Workforce: The board ensures that its workforce policies and practices support the success of the organisation and reflect its values and its</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p> <p>Comments:</p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Staff team work to BCHA Group policies mainly and are line managed via BCHA under Service Level Agreement 	<p>Action needed: -</p> <p>By whom:</p>

commitments to equality, diversity and inclusion.	-		-
(1) The board has access to insight into the views of staff, such that their opinions and needs are understood, and influence the board’s decisions as appropriate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/> Comments: -	Evidence: <ul style="list-style-type: none"> Board member visits Staff can approach Chair with concerns directly Monthly Service report Service Manager attends Board meetings and feeds in views of staff as requested 	Action needed: - By whom: - By date: -
(2) The board determines a strategy for remuneration of the workforce which is aligned to the organisation’s size and complexity, and to its purpose and values.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/> Comments: STFH relies on BCHA remuneration policies	Evidence: <ul style="list-style-type: none"> BCHA Salary scale and procedures 	Action needed: - By whom: - By date: -
(3) The board has policies on the safety and wellbeing of its workforce and reviews their effectiveness.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/> Comments:	Evidence: <ul style="list-style-type: none"> BCHA Policies although Monthly Service report includes commentary on Staff Team 	Action needed: - By whom:

	-		-
			By date:
2.6 Performance: The board has demonstrable oversight of the organisation’s performance.			
<p>(1) The board exercises active and regular oversight of delivery of strategies and plans. This includes scrutinising key operational and financial performance information, and information concerning resident insights and satisfaction.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Management accounts reviewed by Board every 2 months • Monthly Service Report 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(2) The board has assurance that the reports it receives provide an accurate picture of performance.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Board member visits enable “reality check” for customer and staff views and condition of properties • Audit of accounts includes provides assurance of financial performance 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

2.7 Group Structures: Organisations with subsidiaries ensure that these entities support and enhance delivery of the group parent's mission.			
<p>(1) Where the group parent is not a registered provider, formal arrangements are in place to ensure that any registered provider subsidiaries remain compliant with their own charitable or community benefit purposes, and with regulatory requirements.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>
<p>(2) Where a subsidiary is to be or has been established, the benefits, risks, and relationship with the parent organisation are reviewed by the board of the parent beforehand and thereafter regularly.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>STFH has no subsidiaries regularly.</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>
<p>(3) The board of a parent organisation in a group structure has the responsibility and the reserve powers to direct, and if necessary, intervene in the governance of its subsidiaries.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p>

			-
<p>(4) The constitutional relationship and arrangements between the parent and each subsidiary including how oversight and control will be exercised, are formally documented.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • STFH Articles • Governance Framework • Board Terms of Reference (TE) • Service Level Agreement 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(5) The board of the parent approves the group’s plans and budgets, and holds the board of each subsidiary accountable for the delivery of its objectives.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(6) The board of the parent considers and determines whether and how this code should apply to each of its subsidiaries.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

			-
<p>(7) Where, within a group, there are people who serve on more than one board, there is guidance and documentation to set out how board members must deal with their overlapping responsibilities and any resulting conflicts of interest.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(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.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>2.8 Joint ventures and partnerships: Organisations that set up joint ventures or partnership vehicles with external counterparties ensure that these are in support of their mission and objectives.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>STFH is not party to any Joint Ventures or legal Partnerships</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

3. Board Effectiveness			
Principle 3			
The organisation is led by a skilled and diverse board which regularly reviews and capably manages its own performance and effectiveness, and ensures that it complies with this code.			
Compliance			
3.1 Roles and responsibilities: The statutory and governance roles and responsibilities of the board, of its individual members, office holders and of others who work to the board are clearly set out.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> STFH Articles Board Terms of Reference Job Description – generic for Board Members within Group Job Descriptions Chair/Vice Chair 	Action needed: -
	Comments: -		By whom: -
			By date: -
(1) The board elects or appoints a chair with appropriate skills to be responsible for leading the board and ensuring its effectiveness.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> Chair elected by Board 	Action needed: -
	Comments: -		By whom: -
			By date: -

<p>(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.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>STFH does not have an Audit or Remuneration Committee</p>		<p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>(3) Where there are executive board members, the board formally records and publishes policies about the role they play on the board and committees, and makes clear those matters for which they must leave the meeting, or not participate in debate or decision making.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>All Board members are non-executive</p>		<p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Roles held by non-executives 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>

<p>(5) Executives are not members of the committees responsible for nominations, remuneration or audit.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>There are no such committees at STFH</p>		<p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>(6) There is a clear, documented framework setting out delegations to staff, committees and subsidiaries.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Group Financial Regulations 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>3.2 Functions of the board: there is a record of the essential functions and other matters which are reserved for board decision and cannot be delegated. In addition to matters set out in law, statute, regulations and in the organisation’s constitution these include as a minimum:</p>			
<p>These essential functions include</p> <ol style="list-style-type: none"> Setting mission/values Setting a positive culture Ensuring operations are effective/efficient 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Board Terms of Reference 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>

4. Being satisfied financial information is sound 5. Overseeing delegations 6. Overseeing risk			By date: -
3.3 Board composition: board members have the attributes and time needed to govern effectively, and each member exercises independent judgement in doing so.			
(1) The organisation determines, documents and regularly reviews the board composition best suited to its needs; in the case of a group subsidiary, this may be a matter for the group parent.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> • Governance Framework 	Action needed: -
	Comments: -		By whom: -
			By date: -
(2) The board has between five and 12 members, including any co-optees and executive members.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> • STFH Articles • Governance Framework • 8 Board members at 31/3/23 	Action needed: -
	Comments: -		By whom: -
			By date: -
(3) Executive board members, if appointed, are in a minority on	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/>	Evidence:	Action needed: -

<p>the board and in the quorum for a board meeting.</p>	<p>Comments: There are no executive board members</p>		<p>By whom: -</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Vice Chair role 	<p>Action needed: -</p>
	<p>Comments: -</p>		<p>By whom: -</p>
			<p>By date: -</p>
<p>3.4 Board election, selection and appointment: the board has a diverse membership with the collective skills and attributes needed to govern effectively.</p>			
<p>(1) The board understands, states and regularly reviews the collective skills and attributes it requires to be effective.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework – stated skills reviewed annually by Board 	<p>Action needed: -</p>
	<p>Comments: -</p>		<p>By whom: -</p>
			<p>By date: -</p>
<p>(2) Prospective board and committee members undergo an</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p>

<p>open and merit based assessment process to establish their suitability. [section on external nominees not included]</p>	<p>Not applicable <input type="checkbox"/></p>	<ul style="list-style-type: none"> Governance Framework sets process 	<p>-</p>
	<p>Comments: -</p>		<p>By whom: -</p>
			<p>By date: -</p>
<p>(3) The membership of board and committees comprises people with diverse backgrounds and attributes, having regard to the diversity of the communities the organisation serves and in line with the organisation’s stated commitments to equality, diversity and inclusion.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Board includes men and women and people of working age/those retired. There are no current members from a non-White British heritage or with declared disabilities 	<p>Action needed: -</p>
	<p>Comments: Ensuring Board diversity is an ongoing process</p>		<p>By whom: -</p>
			<p>By date: -</p>
<p>(4) People with direct lived experience of (or particular insight into) the communities served by the organisation are meaningfully engaged in governance structures.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework Board member visits to houses to listen to views of residents 	<p>Action needed: -</p>
	<p>Comments: Gaining insight from residents is an ongoing process</p>		<p>By whom: -</p>
			<p>By date: -</p>
<p>(5) Shareholders who are not board members are supported</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed: -</p>

<p>and informed to play their proper constitutional role in the organisation's governance and in particular in the election of board members.</p>	<p>Not applicable <input checked="" type="checkbox"/></p>		
	<p>Comments: Non-board members shareholders are few in number although are contacted on FR events</p>		<p>By whom: -</p>
			<p>By date: -</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Board area on website • Annual Board Appointment and Composition Statement 	<p>Action needed: Update governance area</p>
	<p>Comments: -</p>		<p>By whom: Gordon Pardy</p>
			<p>By date: 31 July 2024</p>
<p>3.5 Committees: committees are established where the board determines that they will enable it to exercise more effective scrutiny, control or oversight of particular areas of the organisation's activity.</p>			
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> • Fundraising Committee • Report back to each Board 	<p>Action needed: -</p>
	<p>Comments: -</p>		<p>By whom: -</p>

			By date: -
(2) The membership of committees is determined on the basis of the skills, attributes and diverse characteristics which the board determines are appropriate.	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/>	Evidence:	Action needed: -
	Comments: -Committee comprises members who have volunteered and have the time capacity to serve on the Committee		By whom: -
3.6 Board Remuneration: organisations paying non-executive board members have an objective mechanism for setting payment levels. This will normally be the responsibility of a committee responsible for remuneration, using independent advice.			
Payment conforms to the principles set out in more detail in the Code	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/>	Evidence:	Action needed: -
	Comments: STFH does not pay its Board members		By whom: -
			By date: -
3.7 Tenure and renewal: tenure for nonexecutive board members (and independent committee	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: • STFH Articles	Action needed: -

<p>members) complies with the organisation's constitution and is managed so as to enable the organisation to achieve an appropriately skilled, diverse and independent board membership.</p>	<p>Comments: None</p>	<ul style="list-style-type: none"> Governance Framework 	<p>By whom: -</p>
<p>(1) The board has a strategy for its own renewal which is based on an agreed statement of the skills, qualifications, diversity and other attributes required.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework sets out the broad objectives for board composition, skills and diversity There is no separate strategy for renewal as the organisation is small and looks to recruitment needs as vacancies arise or in relation to impending retirements 	<p>Action needed: -</p>
<p>Comments: -</p>	<p>Comments: -</p>		<p>By whom: -</p>
<p>(2) Where a member is at the end of a term of office and is eligible for reappointment, this is subject to considering the member's performance and skills, and the needs of the board.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework Third term approval by Board 	<p>Action needed: -</p>
<p>Comments: -</p>	<p>Comments: -</p>		<p>By whom: -</p>
<p>(3) Maximum tenure will normally be up to six consecutive years (typically comprising two terms of office), but where a member has served six years, and the board</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework Board member register records date of appointment and term served to date 	<p>Action needed: -</p>
<p>Comments:</p>	<p>Comments:</p>		<p>By whom:</p>

<p>agrees that it is in the organisation's best interests, their tenure may be extended up to a maximum of nine years.</p>	<p>-</p>	<ul style="list-style-type: none"> Board approves extensions to Third terms 	<p>-</p> <p>By date:</p> <p>-</p>
<p>(4) A member who has left the board is not re-appointed for at least three years.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p> <p>Comments:</p> <p>-</p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework 	<p>Action needed:</p> <p>-</p> <p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>(5) These provisions concerning tenure apply to office held across all of the organisation's boards and committees, and those of predecessor organisations, including service as a co-optee.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p> <p>Comments:</p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework Group Company Secretary oversees 	<p>Action needed:</p> <p>-</p> <p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>3.8 Conduct of business: the board and its committees conduct their business efficiently, and on the basis of an appropriate level and quality of information.</p>			
<p>(1) The board has appointed (and is responsible for the removal of) a company secretary</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Company Secretary appointed 	<p>Action needed:</p> <p>-</p>

<p>who is accessible to all board and committee members and accountable to the board for advising on governance matters.</p>	<p>Comments: -</p>	<ul style="list-style-type: none"> Governance Framework 	<p>By whom: -</p>
<p>(2) Board and committee meetings are quorate.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Board Terms of Reference Minutes of all meetings 	<p>Action needed: -</p>
	<p>Comments: In the unlikely event a meeting in not quorate it may be rescheduled of no votes are taken</p>		<p>By whom: -</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework Agendas and minutes 	<p>Action needed: -</p>
	<p>Comments: -</p>		<p>By whom: -</p>
<p>(4) Urgent decisions between board meetings are taken in accordance with predetermined</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework 	<p>Action needed: -</p>
	<p>Comments:</p>		<p>By whom:</p>

and formally recorded arrangements.	-		-
(5) Meetings are fully inclusive and accessible, with adjustments made as necessary so that all members are able to attend and participate.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>Meetings are generally held on-line to promote accessibility</p>		<p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
(6) Where meetings are conducted remotely, arrangements are made and support provided so that all members can fully participate and contribute.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Protocol for Online meetings in Governance Framework. 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
(7) There is a policy and procedure setting out how disputes and grievances involving members of the board can be raised, and how they are responded to.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework Board Disputes and Grievances 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>

			By date: -
3.9 Board performance, review and learning: the board reviews and seeks to improve its performance.			
<p>(1) All boards and committees consider their effectiveness annually and assess how they conduct their business, including:</p> <p>(a) Composition, skills, experience and diversity.</p> <p>(b) Effectiveness in role-modelling the desired culture, values and behaviours of the organisation.</p> <p>(c) Governing instruments, delegations, regulations, standing orders, structures, systems and other formal documentation as referred to in this code.</p> <p>(d) Timing and frequency of meetings.</p> <p>(e) Format of agendas, quality and scope of papers, minutes and communications.</p> <p>(f) Effectiveness of decision-making, including how the views and needs of key stakeholders, including residents and other</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Annual Governance review each July FR Committee is not required to review its activity separately – the Board does this as part of the Annual Governance review 	Action needed: -
	<p>Comments:</p> <p>-</p>		By whom: -
			By date: -

<p>customers, have informed decisions.</p> <p>(g) Compliance with this code and legal duties.</p>			
<p>(2) These matters are regularly and formally reviewed.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p> <p>Comments:</p> <p>-</p>	<p>Evidence:</p> <ul style="list-style-type: none"> Review undertaken by Company Secretary as part of formal Board meeting 	<p>Action needed:</p> <p>-</p> <p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>(3) All new board and committee members receive a full induction.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p> <p>Comments:</p> <p>-</p>	<p>Evidence:</p> <ul style="list-style-type: none"> Induction checklist guides process – which is proportionate given small size of charity 	<p>Action needed:</p> <p>-</p> <p>By whom:</p> <p>-</p> <p>By date:</p> <p>-</p>
<p>(4) All members have an agreed programme of ongoing learning and development opportunities. This includes addressing any needs identified through the appraisal process.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p> <p>Comments:</p>	<p>Evidence:</p> <ul style="list-style-type: none"> Agenda includes consideration of training needs 	<p>Action needed:</p> <p>-</p> <p>By whom:</p> <p>-</p>

	Training is not programmed formally but suggested by members/co sec	<ul style="list-style-type: none"> • Training delivered by staff or others prior to or during Board meetings (e.g complaints handling March 2023) 	By date: -
3.10 Member appraisal: a full, rigorous and documented appraisal process for the individual members of the board and its committees, including the chairs, is carried out at least every two years.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> • Governance Framework sets process • Chair appraisal last undertaken by Vice Chair in 2023/24. • Board member appraisals last undertaken by Chair in 2022/23 	Action needed:
	Comments: This provision requires action		By whom:
(1) The appraisal of the board's chair is led by a senior board member, informed by the views of all board members.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> • Undertaken as part of Annual Governance review by Board member survey arranged via Company Secretary 	Action needed: -
	Comments: Company Secretary facilitates survey		By whom: -
(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 <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> • Governance Framework 	Action needed: -
	Comments: -		By whom: -

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

<p>(3) Where an organisation has subsidiaries which have not adopted this code, the reasons for this are given.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(4) All policies, documents and statements referred to in this code are formally recorded as appropriate and are regularly reviewed.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Schedule of Code of Governance documentation monitored and updated as necessary by Company Secretary Governance Framework and Board Terms of Reference particularly are formally reviewed by the Board annually 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

4. Control and assurance

Principal 4

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

Compliance

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

<p>(1) The board can have confidence in the information it receives and there are robust internal controls and systems for business and control assurance in place which are reviewed annually.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p style="text-align: center;">-</p>
	<p>Comments:</p> <p>Review of Internal controls effectiveness conducted by BCHA Board for group</p>		<p>By whom:</p> <p style="text-align: center;">-</p>
			<p>By date:</p> <p style="text-align: center;">-</p>
<p>(2) There is a committee primarily responsible for audit, and there are arrangements for effective internal control assurance and audit functions.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/></p>	<p>Evidence:</p>	<p>Action needed:</p> <p style="text-align: center;">-</p>
	<p>Comments:</p>		<p>By whom:</p> <p style="text-align: center;">-</p>

	BCHA has an audit committee covering all group activity		By date: -
(3) The organisation’s external auditors are independent and effective, and their appointment is reviewed at least every six years.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: <ul style="list-style-type: none"> • Crowe LLP are the external auditors • 2023/24 is their third year of appointment 	Action needed: -
	Comments: -		By whom: -
			By date: -
4.2 Audit committee: a committee exercises independent scrutiny and challenge to provide the board with assurance.			
Provisions for audit committees are listed in full in the Code	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input checked="" type="checkbox"/>	Evidence:	Action needed: -
	Comments: BCHA has an audit committee covering all group activity		By whom: -
			By date: -
4.3 Risk: the board retains ultimate responsibility for risk management and ensures that appropriate risk management arrangements are in place.			

<p>(1) The board may delegate the detailed scrutiny and evaluation of risk to a committee.</p> <p>(2) The board has a suitable risk management framework in place; it understands the organisation’s risk profile and the effectiveness of key controls.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> BCHA Risk Policy and Control Framework 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>STFH is part of BCHA’s overall risk and control framework</p>		<p>By whom:</p> <p>-</p>
<p>(3) The board establishes and documents its appetite for the risks the organisation faces in pursuit of its strategy.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Risk Appetite reviewed at May 2024 board 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Business Continuity arrangements Business Continuity insurance BCHA IT services enable agile working 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>This is a Group wide arrangement</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

<p>(5) The board includes members with skills and experience appropriate to the level and type of risks faced by the organisation.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Current skills include: PR, legal, finance, business and governance with other organisations 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Opportunity to consider emergent risks on each board agenda Annual Review of Risk Register in May 2024 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(7) The board regularly participates in stress-testing its plans, to identify the risks (or combination of risks) that may pose a material threat to the viability of the business and ensure that appropriate mitigations are in place.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Group Financial Plan includes stress testing 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>This is undertaken at Group level</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Director's Report - Financial Statements 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>4.4 Compliance: in line with its mission and values, the board retains ultimate responsibility for the organisation’s compliance with all legal, statutory, regulatory and constitutional requirements.</p>			
<p>(1) The board has a robust internal control framework and has regular assurance about the effectiveness of key controls including controls to ensure compliance.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Managed at Group level by BCHA 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
<p>(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.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Monthly service report Internal audits undertaken at Group level would be passed to STFH Board, if directly relevant 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		<p>By whom:</p> <p>-</p>
			<p>By date:</p> <p>-</p>

<p>(3) The board publishes an annual statement setting out its approach to compliance and internal control.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Financial Statements 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		
<p>4.5 Whistleblowing and confidential concerns: there are clear and well-publicised arrangements for members of staff and others associated with the organisation to raise confidential concerns with a designated nonexecutive member of the board (other than the chair), where these are serious concerns and cannot appropriately be raised through the usual channels, and for these to be dealt with through proportionate and independent investigation as necessary.</p>			
<p>(1) The board ensures that appropriate whistleblowing policies and procedures are in place AND (2) receives an account of matters raised under these policies/actions taken</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> BCHA Group Raising Serious Concerns Policy No whistleblowing complaints made in year but staff aware they can contact Board 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		
<p>(3) If a board member has concerns about the board or the organisation that cannot be resolved, these concerns are shared with the board and formally recorded.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/></p>	<p>Evidence:</p> <ul style="list-style-type: none"> Governance Framework Service Agreements 	<p>Action needed:</p> <p>-</p>
	<p>Comments:</p> <p>-</p>		

			By date: -
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'Adopted Code of Governance' refers to the
National Housing Federation Code of Governance for Housing Association 2020
For details visit: https://www.housing.org.uk/nhf_catalog/publications/code-of-governance-2020/

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