

Code of Governance Compliance Statement 2022-2023



Contents

Foreword from the Chair.....	3
Progress against the 2022-2023 Action Plan.....	4
1. Theme One - Mission and Values.....	5
2. Theme Two - Strategy and Delivery.....	7
3. Theme Three - Board Effectiveness.....	11
4. Theme Four - Control and Assurance.....	13
Appendix A - Evidence List.....	14
Appendix B - Continuous Improvement: Action Plan 2023-2024.....	17

Foreword from the Chair

I am pleased to introduce our second statement of compliance which outlines how we adhere to the requirements of the NHF Code of Governance 2020 with only one area of non compliance which is fully explained in this document

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.

The Code of Governance is a comprehensive document which sets out how organisations should behave across 4 different ‘themes’:

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

The Board and Leadership at Great Places have continued to assure our compliance with the NHF Code of Governance 2020 throughout the year. This has included progressing the actions published in last year’s statement and implementing the recommendations arising from our internal audit. We have also identified further actions for improvement going forward.

This self-assessment statement is a brief summary of our compliance with the Code overall and how we demonstrate this against each of the themes. This year we also explain where we have not met parts 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 is an exciting time for Great Places at the moment. We are currently in the late stages of a merger process with Northern-based registered provider, Mosscafe St Vincent’s (MSV) Housing Group, with a view to complete a Transfer of Engagements later in 2023. Excitingly, this will create a 34,000-home organisation with housing stock across the North-West, Yorkshire and Derbyshire. This will bring us new opportunities and challenges, and will require ever-more robust governance arrangements.

I would like to thank the Board and colleagues at Great Places for ensuring that, with just a single exception, we are compliant, and can demonstrate compliance, with the Code.



Tony Davison,
Chair of Great Places Housing Group



Progress against the 2022-2023 Action Plan

No.	Action	Progress
1	We will continue to build customer profiling data and be able to present clear demographic pictures of who our customers are and where they are based.	Good progress has been made on this objective, with data being captured in the Aareon system. An action plan is in place to continue this work in 2023-2024.
2	We will develop ethnicity and disability pay gap reports in the year, as well as the gender pay gap report.	For the first time this year, we developed and published comprehensive pay gap reports which covered ethnicity and disability, complimenting the gender pay gap reporting that has been in place for some years; as well as developing actions for improvement.
3	We will adopt the NHF Code of Conduct 2022 and carry out a gap analysis by the end of the year, as well as a statement of compliance.	Our Board adopted the NHF Code of Conduct in 2022, and a 'sister' compliance statement to this one has also been published confirming our compliance with that Code.
4	We will continue to review our pay progressions arrangements to ensure the fair remuneration of colleagues across Great Places.	Due to the cost-of-living crisis experienced in 2022-23, the Board took the decision this year to suspend pay progression and instead we sought to use those funds to maximise the support to all colleagues across the board. The 'Sharing Greatness' bonus scheme was suspended and in its place an early payment of the full bonus was made to all colleagues in November 2022, followed by a further one-off payment of an equivalent amount in January 2023. Salary benchmarking was also undertaken and adjustments made to those below market level.
5	We will ensure that all discussions held with regards to compliance with this Code are formally minuted, as is the decision to state compliance in the statutory accounts (from PwC audit).	The confirmation of our compliance with the Code was formally minuted retrospectively, and has been tabled for future Board meetings as a specific item.
6	We will ensure changes to the local Code of Governance provisions and other documents to make the role of Committee Chairs, and succession to those roles, clearer in future versions.	This was done through amendments to the Board Succession, Recruitment and Development Policy which was updated in 2023.
7	We will consider the recommendations of the internal audit on adherence to the Code as well as the advisory recommendations.	<p>There was one low-risk finding in the audit, which has now been implemented in relation to record keeping. There were also 6 advisory-type recommendations which have all been given due consideration and actioned where appropriate.</p> <p>An example of one of these is maximizing opportunities for direct contact from the Chair who has taken part in several podcasts to address colleagues directly, at what is an important time for the organisation.</p>

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

This year was the final year of our 2-year corporate plan (comprising years 4 and 5 of our ten year ambitions) focusing on ensuring stability within the organisation following the Covid-19 pandemic. Our vision, values and operating principles remain strong.

Our Vision

- Great Homes: Maximising our investment in safe, sustainable home
- 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 have concluded that to deliver on vision and values, we need a set of 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

Finally, our Board helped to develop and agree a new Operating Culture for Great Places which was launched in 2021–2022. This explains what distinguishes us from others and creates a shared identity and approach for all of our colleagues. It is both about who we are now & who we aspire to be.

The Operating Culture motto is **“Together we are GREATER”** – with the letters each representing an indicator of our culture:

Operating Culture

- **G**rowing
- **R**espectful
- **E**mpowering
- **A**chieving
- **T**rusted
- **E**xcelling
- **R**eputable



Resident Focus

Great Places has always placed tenants at the heart of decision making, and has sought to include the customer voice in all major decisions, as well as receiving regular updates on customer complaints, compliments, and focused reports from our tenant scrutiny group on specific areas of the business.

The 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.

Customer Focus

How the Board GET insight

- Customer complaints, feedback and compliments
- Customer Scrutiny Group (Insight)
- Customer Satisfaction Surveys
- Community Investment Activity
- Meeting customers on stock tours
- Customer engagement activity - surveys, face-to-face consultations and digital forums
- Informal channels - Hub, Neighbourhoods (patch based models), I&W and Plumlife
- Our Voice - customer engagement portal

What we DO with insight (Board oversight)

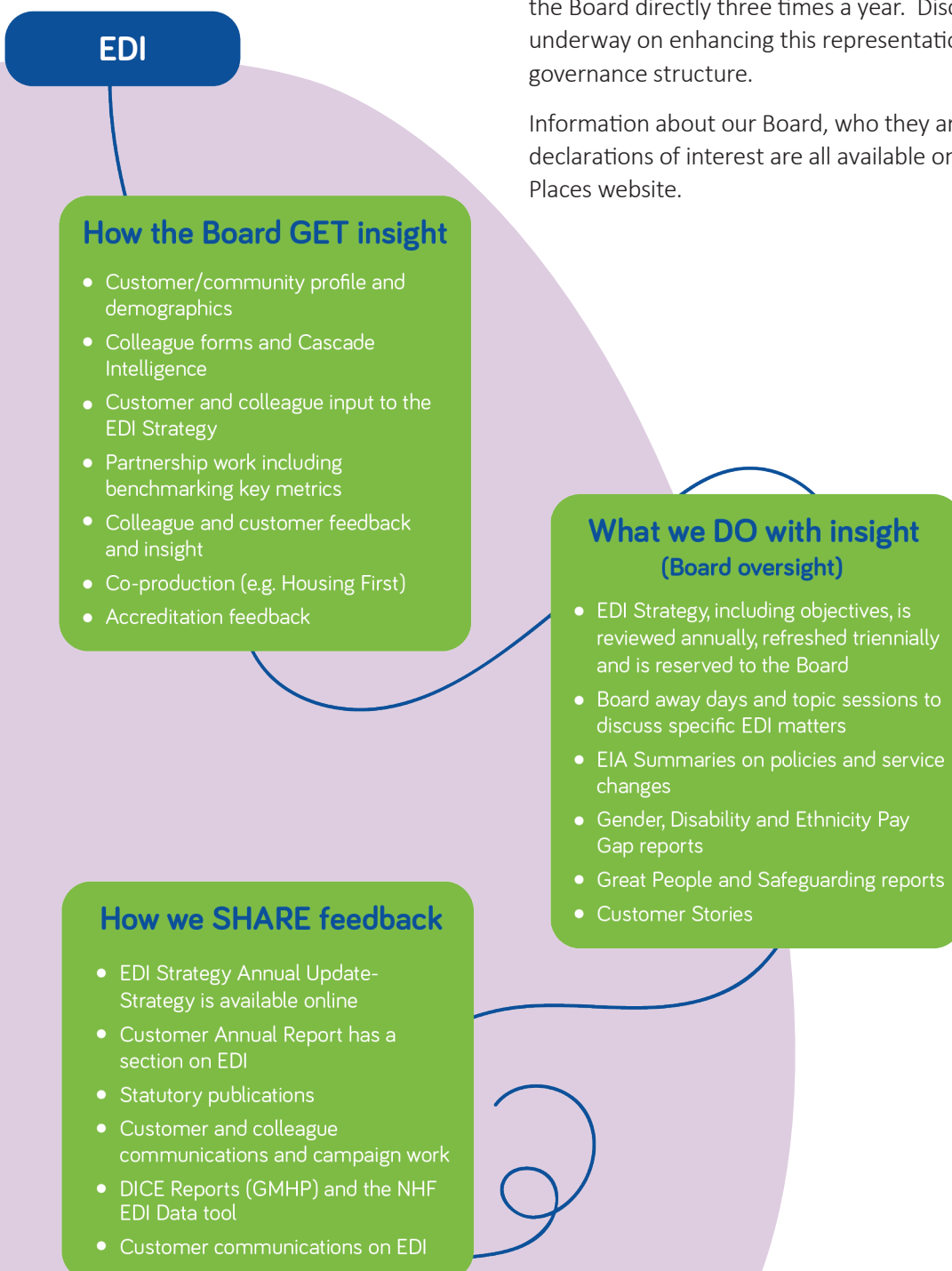
- Review the Customer Experience Dashboard
- Develop CV, CX and CI Strategies and annual updates (approved by Board)
- Compile the Great Communities Report
- Produce 'Customer Stories'. Service-specific reports incorporating customer voice
- The Customer Scrutiny Group (Insight) reports three times per year to Board, and the Board agree actions

How we SHARE feedback

- Plumlife Newsletter
- PFI Newsletter
- Annual Report online
- Website
- Email campaigns
- Newsletters
- Social Media

Equality, Diversity and Inclusion

Great Places has always had a strong focus on Equality, Diversity and Inclusion (EDI) for both our residents, 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. The below diagram demonstrates how we do this.



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. Discussions are underway on enhancing this representation as part of the governance structure.

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. In late 2022, Great Places was one of many providers regraded to V2 by the Regulator of Social Housing. This is reflective of a challenging and riskier economic environment, however retaining our G1 grade demonstrates our strong Governance and Financial Management arrangements that allow those increased risks to be effectively managed.

Strategies, Resources and Plans

This year was the final year of our 2-year corporate plan focusing on ensuring stability within the organisation following the Covid-19 pandemic. Overall we have performed well against the majority of the plan. Despite completing well over 600 new homes in 2022/23, our development ambitions have not been fully realised – partly due to the pandemic, but also due to labour issues and supply chain issues during a challenging high-demand and high-inflation construction market. The cost of living crisis and rising inflation has also had an impact.

Going forward, due to the proposed merger with MSV, we will be putting in place a one-year ‘bridging’ plan focusing on ‘stability’, ‘collaboration’ and ‘ambition’; before a more comprehensive plan is developed with input from the new Great Places Board and Executive Team from Autumn 2023. However, our vision and values remain the same.

The Board have also signed off the 2023/2024 Business Plan, which like last year has been developed in a period of uncertainty including high levels of inflation. The plan has been stress tested with strong involvement from the Board and was published along with a mitigations schedule. This Plan will be updated following a successful Transfer of Engagements later in 2023 to incorporate the MSV financials as well as the key elements of the merger business case

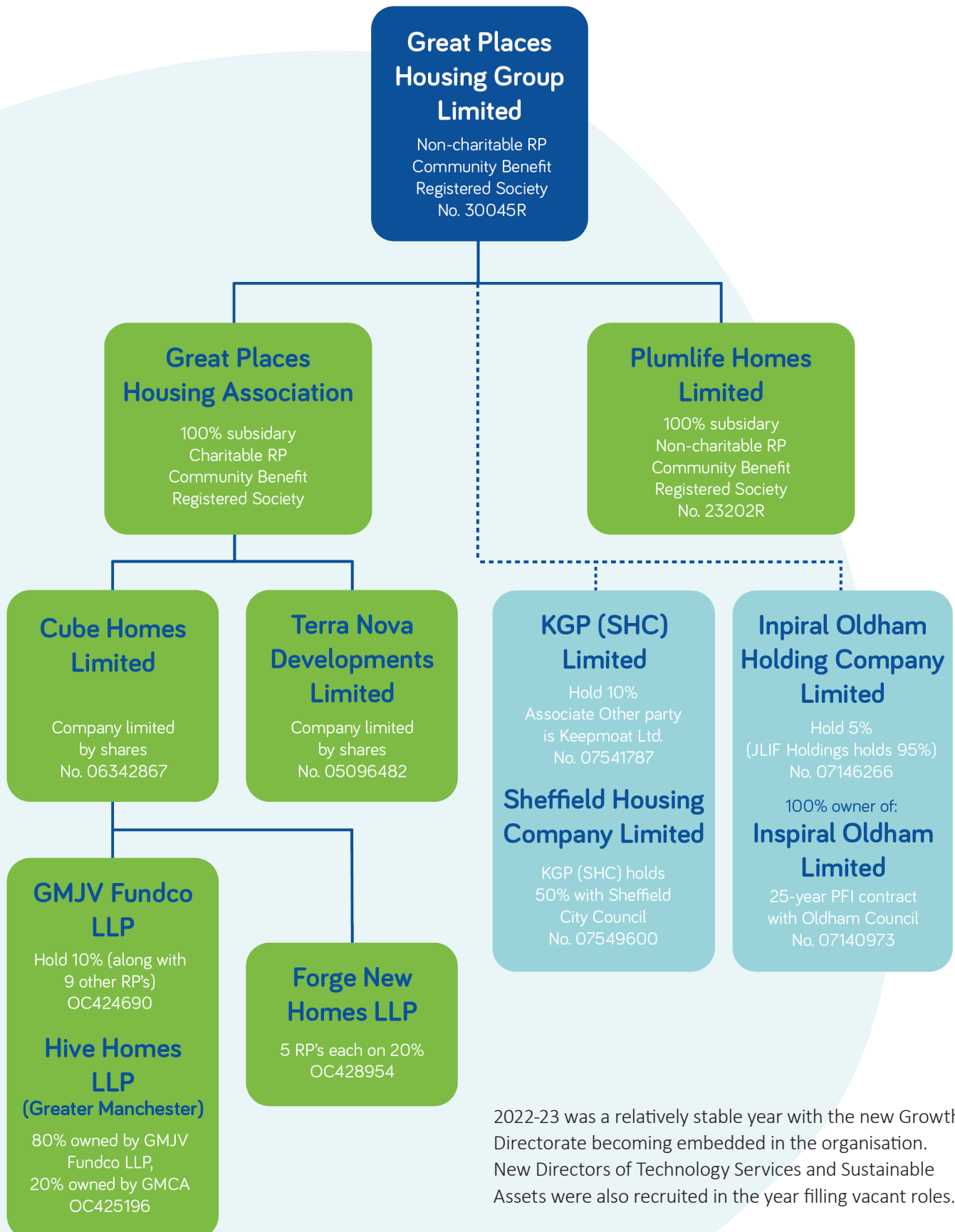
Chief Executive

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. 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:



2022-23 was a relatively stable year with the new Growth Directorate becoming embedded in the organisation. New Directors of Technology Services and Sustainable Assets were also recruited in the year filling vacant roles.

Workforce

In our independent pulse survey in December 2022, 80.3% 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 79% last year 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.

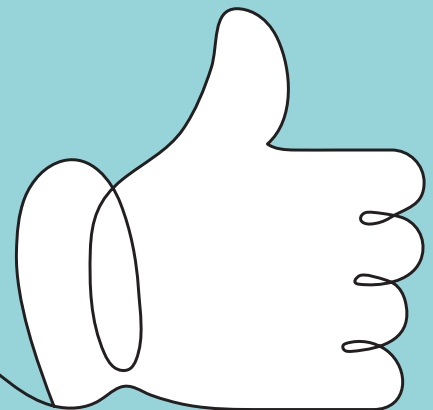
The main point of feedback from the workforce was again relating to pay and reward, which is unsurprising given the cost of living crisis and rising inflation throughout 2022. Again this year, a benchmarking exercise was carried out and salaries for a significant number of roles were adjusted accordingly. The target driven element of the ‘Sharing Greatness’ bonus scheme was suspended for the year and the full payment was made to all colleagues in November 2022 to support with cost-of-living, followed by a further non-consolidated payment in January 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 KPI’s across the themes of Great Homes, Great People, Great Communities as well as some cross-cutting measures.

A suite of these KPI’s are highlighted as Critical Success Factors – which are high priority measures. These are reviewed and targets set annually by a sub-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, 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.



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 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), and 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 is also in place to support this.

Committees

There are two standing Committees of the Board: Audit and Assurance, and Remuneration and Appraisal, 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 both have a terms of reference which clearly states their responsibilities and reporting lines. Ad-hoc committees are also convened from time-to-time to focus on specific tasks (e.g. KPI's and Critical Success Factors, Board 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.

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. Emoluments are always disclosed as part of the financial reporting each year.

The Great Places website has a dedicated page which profiles our Board, their skills, attributes, experience as well as their published declarations of interest for transparency purposes.

Tenure and Renewal - Our single area of Non-Compliance Explained

We have assessed our compliance against the NHF Code of Governance and are compliant with all provisions except one. Great Places has a Board Recruitment, Succession and Development Policy which is overseen by the Remuneration and Appraisal Committee who regularly review Board tenure and renewal. As at March 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 and also the Cube Chair (Tony Davison and David Robinson), 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 well ahead of the September 2022 deadline, Great Places was at the time in early discussions regarding the merger (which are ongoing), and it was agreed that it would be preferable for both Chairs to continue until the merger process was more advanced or completed. This would also enable consideration to be given to the skills of the new merged Board.

The Chair of Cube will be stepping down in September 2023. A new Cube Chair has been recruited and will take over from that point. The Chair of the Board will continue in post for a period following the completion of the merger which is currently scheduled for October 2023.

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.

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 2022 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 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.

Compliance with the NHF Code of Governance

Our annual financial statements and accounts 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 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 exercise was completed in late 2022 with BDO being selected as our new internal auditors from April 2023 onwards. The Committee provides robust challenge to the auditors, as well as to the Executive Team and colleagues where there are concerns or adverse findings.

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. 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 2020.

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	Diverse Activities Report (including structure)	Demonstrates that there is constant review of our structures, activities and potential improvements.
2.2	VfM Strategy	Demonstrates that we maintain a focus on value for money, efficiency and financial sustainability.
2.3	Carbon Management Strategy	Demonstrates our focus on environmental issues and reaching zero-carbon and improving energy efficiency.
2.4	Social Value Summary	Demonstrates our commitment to delivering profit for a purpose and our focus on social sustainability issues facing residents and communities.
2.5	Asset Management Strategy	Demonstrates our commitment to maintaining good homes and continuous improvement of our stock.
2.6	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.
2.7	Pulse Survey Results 2022	Demonstrates our ongoing commitment to understanding how colleagues feel throughout the year and where there is more work to do.
2.8	Scheme of Delegations	Demonstrates the delegated authority to the Chief Executive, as specified in the Code.
2.9	DTP Triennial Governance Review	Demonstrates that the organisation takes external advice on structures and governance arrangements on a regular basis.

No.	Document	Purpose
2.10	Executive Remuneration Policy and Appraisal Policy	Demonstrates that the processes for the appraisal and remuneration of the Chief Executive are formalised in corporate documents.
2.11	Equality, Diversity and Inclusion Strategy	Demonstrates the organisational commitment to EDI which is reflected in our values and corporate priorities.
2.12	People Strategy	Demonstrates the organisation's commitment to the workforce, to recruit, retain, develop and support them.
2.13	Balances 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 confirmed 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.
3.7	Statutory Accounts	The annual statutory accounts will include reference to the Code and how Great Places is compliant with it.
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 identified 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. Our external auditors, Beaver and Struthers, have completed their first year of auditing our statutory accounts and were reappointed at the 2022 AGM.
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.

No.	Document	Purpose
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 2023-24

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 also take account of likely changes we will need to make following the successful completion of our merger.

No.	Action
1	We will continue to build our customer profiling data, and extend this to include new customers following the merger.
2	We will review the Governance structures of the organisation to enhance the customer voice as part of the new larger organisation.
3	We will aim to ensure that by October 2024 we are once again compliant with the tenure and renewal section of the Code.
4	The Board will review the mission, purpose, vision and values as part of the larger merged organisation.
5	The Board will develop a new corporate plan to reflect the priorities of the larger merged organization.
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.
7	The Board will work to harmonise the culture within the new organisation and maintain an overview of this through colleague surveys.
8	A review will be undertaken of the CEO and Executive contracts and remuneration in the year following the merger.
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.
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.
11	The Board will oversee the development of a new Business Plan to reflect the position of the larger merged organisation.
12	The Board will oversee the publication of information about the new Board including their biographies, backgrounds and potential conflicts of interests.
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.
14	The Board will oversee our Independent Triennial Governance Review to be carried out in late 2023/early 2024.
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.

