



Code of Conduct Compliance Statement 2024-2025

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Foreword from the Chair

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

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

It has been another exciting year for Great Places. In July our new Chief Executive, Alison Dean, came into post and along with the Executive Team has worked with the Board to revisit our ten-year ambitions, ensuring that we look to the future as we play our part in addressing the housing priorities of the Government. To support this, a new role of Chief Transformation Officer has been established in the Executive structure and will help drive forward our ambitions ensuring we are flexible and ready to respond to new challenges.

We had our Regulatory Inspection last year from the Regulator of Social Housing, and were one of the first to be inspected under the new consumer standards. Positively we achieved a G1/V2/C2 rating, demonstrating compliance in all areas, but particularly in governance where we maintained the highest rating.

Our new Board members have settled in well since being appointed in March 2024 and have added real value to our governance arrangements, and there will be more change to come as myself, the Deputy Chair and the Chair of Cube will be stepping down in September 2025. Whilst we are all sad to be leaving our friends and colleagues, we are proud of what we have achieved whilst at Great Places and know we are leaving the organisation in good hands.

I would like to thank all of our colleagues who work so hard all year to deliver quality services, meet the needs of our customers and help ensure that we are compliant with our Code of Compliance.

On behalf of the whole Board, and particularly from those of us who are leaving this year, I would also like to thank everyone we have had the privilege to work with over the years, and wish them and Great Places every success for the future.

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

Mervyn Jones,
Chair of Great Places Housing Group



Progress against the 2023–2024 Action Plan

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

No.	Action	Progress
1	The Great Places Board to undertake EDI Training on conscious inclusion in 24-25.	At the Board Away Day in Sheffield in November 2024, “Equality Works” facilitated a workshop for Group and Cube Board members covering conscious inclusion and unconscious bias, among other EDI-related topics.
2	People Directorate to publish a refreshed EDI Strategy and Statement in 24-25 in collaboration with a task and finish group of the Board.	This objective changed mid-year, following broad consultation which led to the standalone EDI strategy and statement being removed, and instead incorporated into the Customer Experience Strategy.
3	Ensure we are prepared and ready for the Access to Information provisions which are being proposed by the Government.	This was consulted on by the previous government and there has been a delay in implementation. The Data Protection team at Great Places have been following the progress carefully to ensure we are able to implement this when it is enacted.
4	Ensure continued briefings throughout the year to ensure all colleagues are aware of Great Places policies and their obligations regarding fraud, bribery and money laundering under the legislation.	Briefings continue to be circulated to colleagues and Board, and mandatory training remains in place.
5	Ensure colleagues are reminded on a six monthly basis of the Speak Up (Whistleblowing policy and procedure).	These notifications continue to be circulated via HOME and whistleblowing incidents are reported to each Audit and Assurance Committee Meeting.
6	Ensure that all colleagues and Non-Executive Directors complete their annual update of Conflicts of Interest.	This is completed by the Governance team and then updated on Cascade. Declarations are also completed at each meeting and the published information is refreshed as necessary.
7	Continue to collate information on customers and colleagues characteristics and outline how these have shaped service provision.	<p>A full campaign was run called “You Share, We Shape” to encourage colleagues to complete this information on the Cascade HR system, with great success; however this is a continuous exercise to ensure the data remains current and relevant.</p> <p>The Signal for Success on customer data saw a 10% improvement in the year, but didn’t meet target. However the data capture measure is only one aspect, as a significant amount of additional work has been done by the team in response to the information they have collated to act on that information and improve services. The data will continue to be collected by the Inclusive Services Team in the short-term, with the aim being to mainstream collection into the wider workforce.</p>

No.	Action	Progress
8	Develop a programme of activity for Great Places colleagues in line with the professionalisation agenda requirements for qualifications which have now been released.	While the initial deadline for implementing the competence and conduct standard was April 2025, some delays and ongoing consultations have resulted in adjustments to transition period. However Great Places along with partners are aware of the Level 4/5 requirements to be put in place and these form part of the new People Strategy 2025-2028. Positively, first wave of colleagues have commenced training in anticipation of professionalisation agenda coming in.
9	Pursue ISO 45003 accreditation on Psychological Health and Safety at Work.	A significant amount of work has gone into putting in place the required elements for the accreditation (e.g. a psychologist in the workplace, the TRiM processes etc.), and the organisation is already feeling the benefits of these. However due to competing corporate objectives, pursuing the accreditation itself is no longer a priority, although may be revisited in the future.
10	Carry out basic DBS checks for customer facing colleagues throughout the year.	Strong progress achieved here with basic DBS check being carried out for colleagues as part of Safer Recruitment, and 100% of enhanced DBS checks in place for relevant colleagues.

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

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

Meeting our responsibilities

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

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

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

Representing the Housing Association

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

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

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

Part II – Behaving with Integrity

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

Conflicts of Interest

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

Anti-Fraud, Bribery, Gifts and Hospitality

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

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

Funds, resources and personal benefit

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

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

Confidentiality

Contracts and Deeds of Appointment make clear that colleagues will have access to, and be entrusted with, information about the Group and are required both during and after their employment to treat this information confidentially. GDPR and Data Protection training is mandatory for all colleagues at induction with regular refresher training and this includes making colleagues aware of how to identify requests for access to personal information (Subject Access Requests).


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

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

Reporting Concerns

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

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



Part III – Conducting yourself professionally and treating others well

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

Respect for others

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

These cultural pillars are supported by our Dignity at Work Policy which guides how we create a workplace environment which encourages respect and acceptance. Our new Customer Experience Strategy embeds our approach to Equality, Diversity and Inclusion for our customers, and our Inclusive Services Team continue to collect customer data and demonstrate a strong approach to tailoring services to meet their diverse needs.

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

At a corporate level we have engaged in the BOOST! Programme aimed at exploring and removing the barriers from black, Asian and other colleagues from diverse backgrounds progressing into senior leadership and management roles. Great Places has been heavily involved in promoting the 20% Movement, which is an initiative across Great Manchester Housing Tenants working in the sector. Our CEO, Alison Dean, worked with a number of young people from across the Greater Manchester Housing Providers to develop this movement and in September Great Places hosted a conference on 'Home Grown' talent.

We have also entered a partnership with Pure Innovations - an organisation who works with disabled people, specifically those with mental health challenges. They have conducted training for our People team and will support existing colleagues in the workplace who have or develop a mental health issue.

Working with residents and other customers

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

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

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

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

This year saw the first full year of our Customer Committee being in place as part of the formal governance structure. In its first year the Committee has reviewed a range of strategies and policies adding their own insight to their development, have reviewed customer communications as well as developing their own performance dashboard which includes insight into customer KPI's, Signals for Success and Tenant Satisfaction Measures.

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

Our aim is to work with customers as partners, building relationships and a strong voice across our regions and involving customers in issues that matter to them. This year we have seen strong performance on the Tenant Satisfaction Measures in social housing with 10 of the 12 scoring higher than the previous year, with particularly strong improvement on the ASB Handling TSM which saw a 9.7% improvement on 2023/24. We continue to communicate these results to our customers via colleague interactions, our website and social media channels and newsletters. The results also form part of the regular reporting to the Board and the Customer Committee.

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

Professional Relationships

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

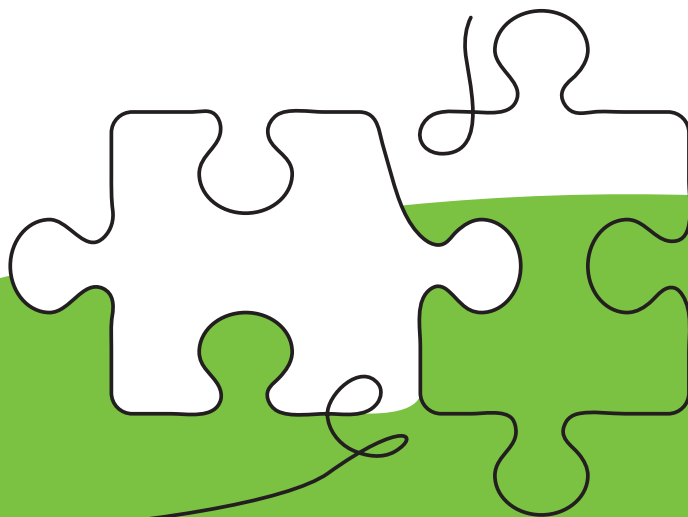
Learning and Development

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

This year we also ran the SHe programme in memory of Sharon Hayes, our former Director of Tech Services who sadly passed away in 2023. This was a six-month development programme designed to empower female colleagues working in male-dominated teams. It involved a level 2 qualification in Leadership and Team skills with some additional modules aimed specifically at confidence building, personal brand and imposter syndrome. The participants also had mentoring from existing female Directors and Heads of Service. This programme was shortlisted for two awards in 2024-25 - the Women in Housing - Career development initiative and the Greater Manchester Good Employment Charter Awards Inclusion Award.

These programmes are all underpinned by options and opportunities being identified through Great Conversations by colleagues themselves. The Remuneration and Appraisal Committee maintain oversight of learning and development as part of their remit to monitor turnover and the overall colleague offer.

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



Part IV – Protecting yourself, other people and the environment

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

Health, Safety and Security

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

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

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

Protecting the environment

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

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

Appendix A - Evidence List

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

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

No.	Document	Purpose
15	Expenses Policy and NED Expenses Policies	These policies set out the associations approach to reimbursing expenses for colleagues as well as a separate policy for NEDs.
16	Great Conversations	This is Great Places' approach to having meaningful 1-2-1's, performance discussions and constructive challenge with colleagues.
17	Great Value	This is our approach to ensuring fair and robust recruitment and that we use the associations funds in the best way securing value for money.
18	Grievance and Disciplinary Policies	This sets out the organisations approach to handling employee grievances and the process to follow in the event of disciplinary action being taken.
19	Performance Capability Policy	This policy outlines the support we will provide to colleagues who may not be performing to the expected standards for their role.
20	Probity Policy	This policy covers declarations and conflicts of interest, hospitality and gift declaration and a range of other probity issue including bribery, corruption and favours. This is read in conjunction with other policies.
21	Recruitment Process	This processes outlines our approach to recruitment including gaining authority to recruit, use of the Hireful system and guides to the interview process.
22	Reputation Strategy	This strategy was passed in 2024 and aims to ensure that we maintain a reputation that we can all be proud of; one of our Great People corporate plan ambitions.
23	Safeguarding Policy	This policy highlights safe working practices for identifying safeguarding concerns, so that appropriate action can be taken to safeguard the wellbeing of children or adults at risk, who reside in Great Places properties or are engaged in services delivered by Great Places.
24	Schedule of Reserved Matters and Delegations (including financial delegations)	These are schedules which identify those matters reserved to the Board and Shareholders and delegated to Committees, the CEO and other colleagues. Separate schedules are available for other subjects including growth, assets and financial delegations.
25	Service Delivery Framework	Our Service Delivery Framework booklets set a vision for service and customer relationships and define the 2-way responsibilities and expectations required to form the foundations of sustainable tenancies.
26	Social Media Management Guidance	This is Great Places guidance on corporate handling of social media in order to protect the reputation of the business and support customers.
27	Social Media Policy	This policy and the associated guidance aim to ensure that Great Places colleagues use social media in a safe and responsible way that doesn't expose them, or the organisation, to risk or harm.

Appendix B - Continuous Improvement: Action Plan 2025-2026

Whilst we are fully compliant with the Code, we know that we can keep getting better at what we do, and have committed to the following actions for the coming year to ensure we meet the highest standards of governance.

No.	Action
1	We will continue to ensure we are prepared and ready for the Access to Information provisions which are being proposed by the Government.
2	We will ensure that all new Board Members and Growth Committee Members received a full induction, making clear their responsibilities and obligations under this Code.
3	Ensure that all colleagues and Non-Executive Directors complete their annual update of Conflicts of Interest.
4	Ensure colleagues are reminded on a six monthly basis of the Speak Up (Whistleblowing policy and procedure).
5	Continue to collate information on customers and colleagues characteristics and outline how these have shaped service provision.
6	Ensure that the Audit and Assurance Committee and Board are trained and informed of the new requirements of the Economic Crime and Corporate Transparency Act 2023 as it applies to the Association, and that these requirements are embedded in our policies.

