

Code of Governance Compliance Statement 2025 - 2026

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Foreword from the Chair

For the first time as Chair, I am pleased to introduce our fifth statement of compliance which outlines how we adhere to the requirements of the NHF Code of Governance 2020, demonstrating compliance with all areas of the Code.

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

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

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

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

It has been another exciting year for Great Places. This year our new Chief Transformation Officer, Sharon Brown, came into post and has supported the Board to develop our new set of 10-year ambitions, which will help shape the decade ahead as well as anchor our new Corporate Plan which we will be developing for 2027-2030. We also welcomed Matt Foreman in January as our new Chief Customer Officer replacing Guy Cresswell who left the business in February after 32 years.

We had our annual review from the Regulator of Social Housing, and positively we were regraded to a C1 rating against the consumer standards. This means we have an overall G1/V2/C1 rating, demonstrating compliance in all areas, but particularly in governance where we have retained the highest rating.

This year also saw the recruitment of 5 new Board members, including myself, who have settled in well since being appointed in September 2025. I would like to thank Mervyn, Chris and Emma who stood down having reached their maximum tenure, but also pay tribute to the new Board Members who have added real value. I also want to acknowledge the contributions of the independent members of the Customer and Growth Committees as part of our new structure, who bring their unique expertise and insight to their roles and strengthen our governance arrangements overall.

Finally, on behalf of the whole Board, and particularly from the newer members, I would also like to thank all the colleagues we have had the privilege to meet and engage with so far, 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 Governance.

Cath Purdy,
Chair of Great Places Housing Group



Progress against the 2025–2026 Action Plan

This year, all of the 6 actions in the action plan were achieved or exceeded.

No.	Action	Progress
1	We will develop new 10-year ambitions for the organisation, to be agreed by the Board.	Completed: This piece of work was led by the Chief Transformation Officer and signed off by the Board during the year. It was launched internally at the Leaders and Managers Conference at the start of 2026.
2	We will ensure that we publish clear and up to date information about our new Chair, Board Members, Committee Members and governance structures when the changes take effect in September 2025.	Completed: The information was uploaded to the Great Places website on the handover date of 11th September 2025. All relevant changes were made on companies house and with the FCA, and a range of internal communications was also undertaken to introduce colleagues to the new Board and Committees.
3	We will effectively embed the new growth committee and coterminous arrangements, update all corporate documents, including the Code of Governance, and promote awareness of these changes throughout the organisation.	Completed: The new Growth Committee was established with key changes being made to the Code of Governance including the new terms of reference and role profiles for the committee. Cube has been subsumed into the coterminous arrangements for the Board, and all entities have had an update to their governing documents. Early feedback from the Board appraisal process has demonstrated strong satisfaction and confidence with the new Committee arrangements.
4	We will carry out a review of the NED and Committee Member remuneration in late 2025-early 2026 in advance of implementation from April 2026.	Completed: Altair were commissioned to carry out the biennial review of NED remuneration, as well as independent committee remuneration as per the policy. Following recommendation from the Remuneration and Appraisal Committee, the Board agreed the proposed changes to ensure remuneration remains in line with market benchmarks.
5	We will develop a guide for Non-Executive Directors and provide training (if necessary) on handling and managing conflicts on a coterminous Board.	Completed: A briefing for all NEDs was produced outlining potential conflicts of interest whilst on the coterminous Board, as well as a standard operating procedure for the Governance team to ensure that papers, agendas and minutes clearly distinguish entity-level decisions as appropriate.
6	We will ensure the effective and prompt induction and onboarding of the new Chair, NEDs	Completed: All induction and onboarding activities were carried out as planned, with the feedback from the new Board and Committees being overwhelmingly positive regarding the process.

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

After a successful first year of delivery, 2025-2026 saw us work through our second year of the 3-year Corporate Plan "Here for our Customers" which affirms that we want to be:

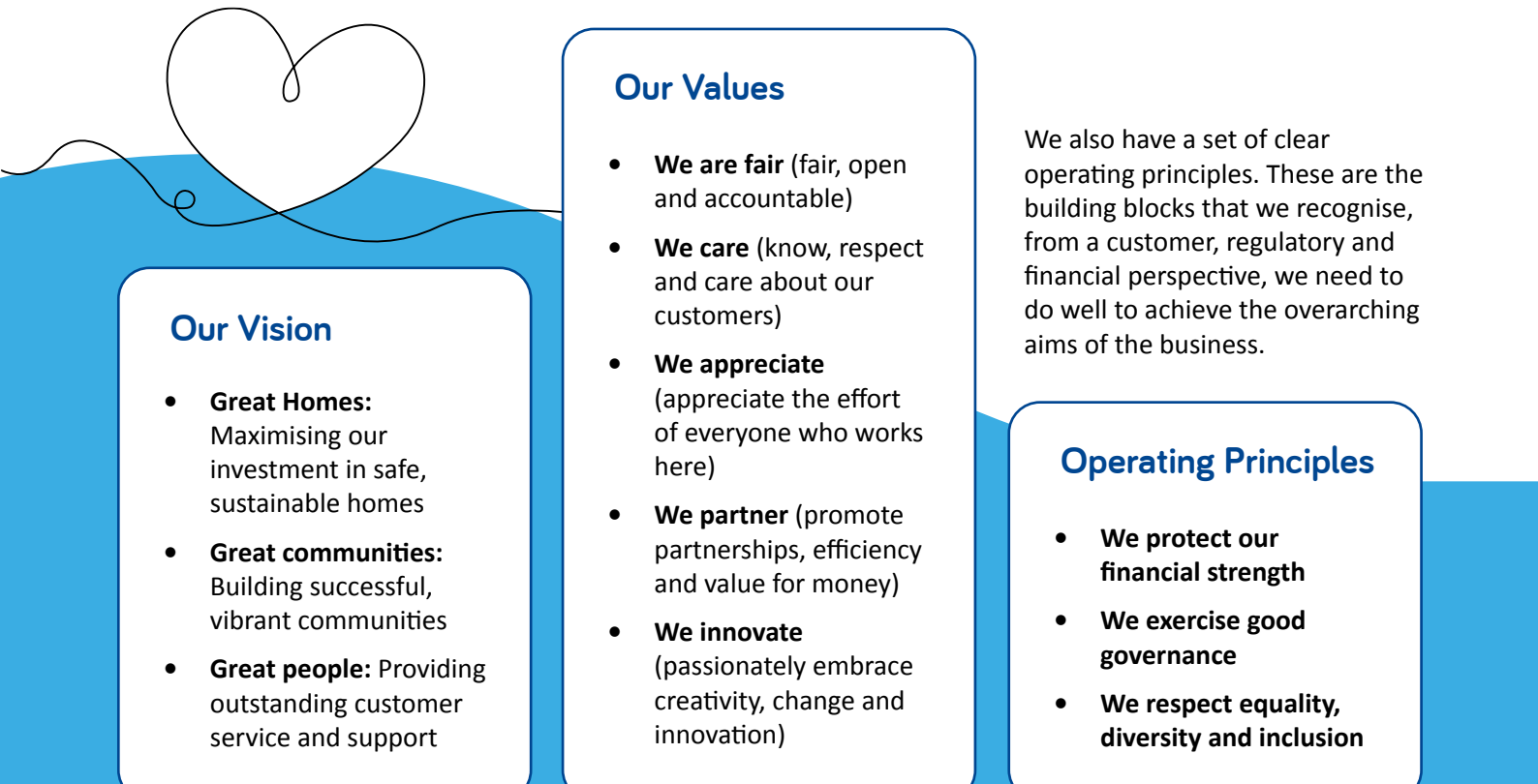
- Great for our customers
- Great for our homes and communities
- Great for our business

In 25-26, there has been excellent progress in delivering the complaints and repairs reviews, with early signs of improvement as a result. The multi-channel communications platform has been rolled out and has now been closed as a priority.

The management accounts review has been extended to a wider finance programme and will continue into year three.

The plan focused on 5 key priorities in the areas of property, data, compliance, management accounts and a multi-channel communications platform. Strong performance has been achieved in all of these areas, despite this being a hugely ambitious programme. Going into year three there are two new priorities: Customer Services and Building Professional Excellence, with these being a focus into 26-27.

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



Our Vision

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

Our Values

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

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

Operating Principles

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

Resident Focus

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

2025-2026 saw a strong second year for the committee with them carrying out scrutiny of key parts of the corporate plan including the complaints and repairs review, as well as signing off the Housing Ombudsman Service self-assessment, reviewing the work of the Social Value and Independence and Wellbeing teams and inputting to the new Customers and Communities Strategy.

The members of the committee have also added value by supporting recruitment and attending conferences on behalf of the organisation, representing Great Places at a national level.

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

How we capture insight from customers

- » **Customer Committee** - feedback and input
- » **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 the board does with the insight from customers

- » Review the Customer Experience Dashboard
- » Respond to Ombudsman's annual report and self-assessment
- » Approve Customer Experience and Customers and Communities Strategy
- » Review the Great Communities Report
- » Consider 'Customer Stories' and service-specific reports incorporating customer voice
- » Hear from the Customer Scrutiny Group (Insight) and agree actions as a result of those reviews. Progress is then monitored by the new customer committee.

How we share feedback with customers & colleagues

- | | |
|--|---|
| » Website | » Monthly e-news bulletins |
| » Plumlife and PFI Newsletters | » Email and Social Media Campaigns |
| » Corporate Reports including Annual Complaints Report, ESG and Quarterly Performance Updates | » Internally via HOME and podcasts |
| » My Great Place magazine | » Publication of our TSM results |
| | » Leaders and Managers Conferences |
| | » Colleague conferences |

Equality, Diversity and Inclusion

Great Places has always had a strong focus on Equality, Diversity and Inclusion (EDI) for both our customers colleagues and Board. Key to this is having strong data as a baseline, using different ways to capture insight on EDI and going above and beyond the minimum requirements to ensure we are doing everything possible to use this information to improve where we can. Our Inclusive Services team have done a fantastic job improving the data we hold significantly, helping us understand the detailed demographics and needs of our customers enabling us to tailor our services. They will continue to work on this data aspect as we look to mainstream this activity to make it ‘business as usual’.

The below diagram demonstrates our approach to insight around EDI:

What the Board does with the insight on EDI

- » Approves Diversity, Equity and Belonging statement
- » Approves the Customer Experience Strategy which includes our approach to EDI
- » Discuss EDI specific matters at Board away days and Topic sessions
- » Reviews EIA Summaries on policies and service changes
- » Approves the Gender, Disability and Ethnicity Pay Gap Reports
- » Reviews the Great People and Safeguarding Reports which consider EDI matters
- » Reviews customer stories and gets feedback from customer-facing colleagues
- » Considers equality of service based on information from TSMs
- » Approves and receives updates on programmes and innovations aimed at improving EDI representation

How we capture insight on EDI

- » Customer/community profile and demographics (supported by the Inclusive Services Team)
- » Colleague forms and Cascade Intelligence
- » Customer and colleague input to the EDI strategy
- » Partnership work including benchmarking key metrics
- » Colleague and customer feedback and insight
- » Co-Production (e.g. Housing First)
- » Accreditation feedback
- » Information and analytics from the tenant satisfaction measures

How we share feedback with customers & colleagues

- » ESG Report has a section on EDI
- » Statutory publications
- » Customer and Colleague communications and campaign work
- » DICE Reports (GMHP) and the NHF EDI Data tool
- » Customer Communications on EDI
- » Information through HOME and podcasts

Integrity and Accountability

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

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

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

2. Theme Two - Strategy and Delivery

This section explains how the Great Places Board sets ambitious plans and strategies for the organisation, ensuring that we remain financially viable, are well governed and that they maintain strong oversight of arrangements to achieve this. Great Places colleagues have worked hard throughout 2025-26 addressing the findings of the Regulatory Inspection which assesses against the consumer standards. As a result, we have now achieved a G1/V2/C1 rating.

Strategies, Resources and Plans

Great Places has a 3-year corporate plan in place called “Here for our Customers” as well as annually approving the Business Plan which reflects the continuously changing operating environment. The Board also reviewed our 10-year ambitions in 2025/26 taking a long-term view of where we want to be in 2035/36.

Chief Executive

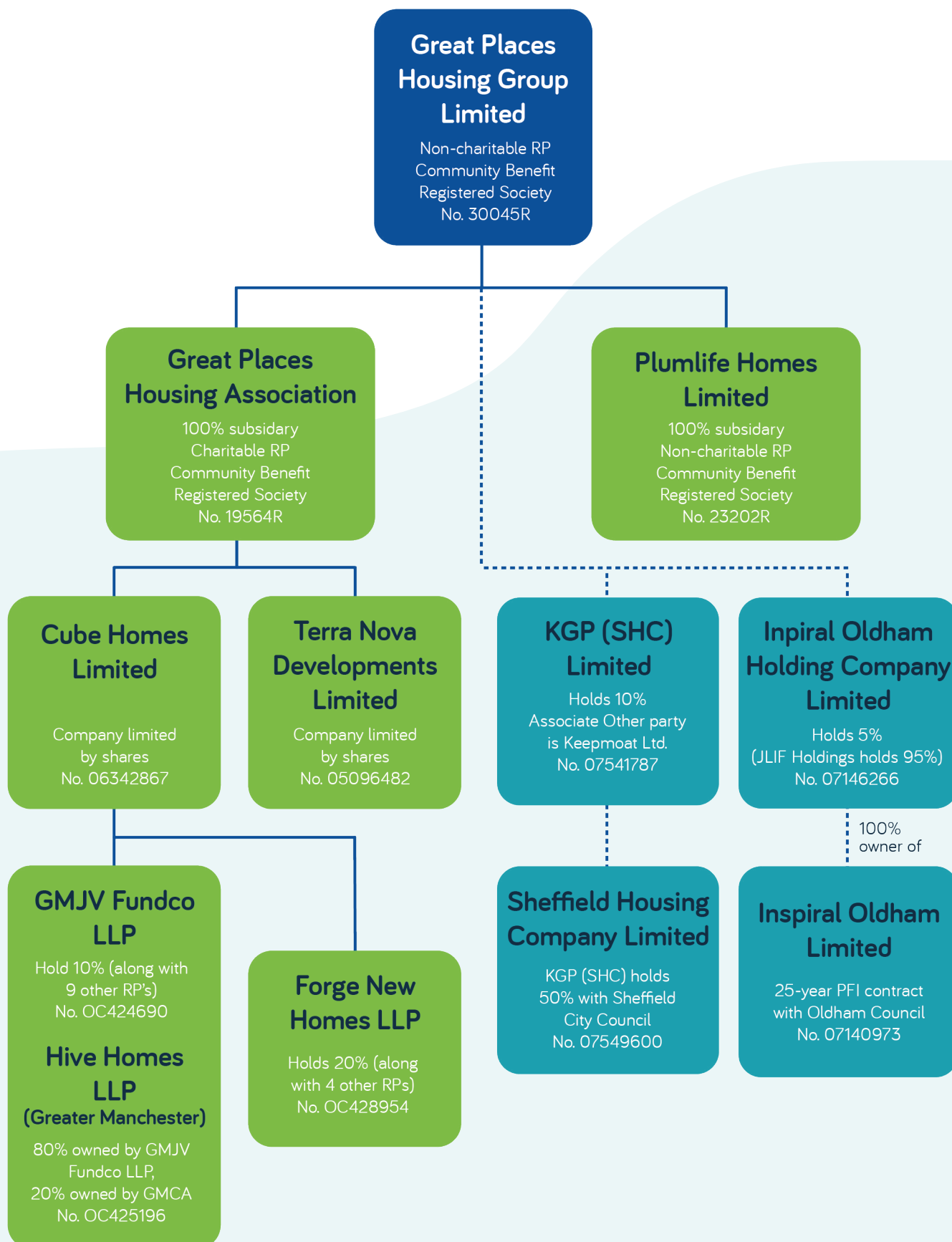
The Code of Governance contains many provisions relating to the Chief Executive who has the delegated authority to oversee and manage the operational delivery of the organisations strategies and plans. These clauses include ensuring that there is a rigorous contract of employment in place, that they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

Structures, Joint Ventures and Partnerships

Great Places operates with a coterminous Board which represents Great Places Housing Group, Great Places Housing Association, Plumlife Homes, Terra Nova Developments – and as of 2025, Cube Homes Limited. From 2025 a new Growth Committee was established to ensure stronger oversight of development activity, composed of a mixture of Non-Executive Directors and Independent Members with expertise in land, development and property.

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

2025-2026 saw a new Chief Customer Officer come into post following the retirement of their predecessor. Anew Chief Transformation Officer was also appointed to lead the strategic and cultural transformation of Great Places, enhancing service delivery and operational efficiency.



Workforce

Great Places colleagues continue to give positive feedback in our all-colleague surveys. And then continue as normal. The comparable questions that feature in all surveys have the highest positive response with 'I know and understand what Great Places vision and values are' scoring 95% and 'I'm motivated to achieve Great Places purpose, vision and values' now 91%. This takes our overall engagement score to 90%, a 3% increase on previous scores and exceeding the 85% stretch target.

The benchmark question 'How satisfied or dissatisfied are you with the organisation as an employer?' had an 84% positive response, putting Great Places comfortably above the median of 80.15%.

The main points of feedback from the workforce continues to be pay and reward. Therefore this year a new Pay Policy was developed and approved which reinstated pay progression for colleagues enabling them to progress within the organisation. This had been a priority for the Remuneration and Appraisal Committee and was launched in March 2026.

Performance

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

12 of these are highlighted as 'Signals for Success' which are high-priority measures, and these are reviewed and targets set annually by the Board. Examples of the measures include Development starts on site, interest cover EBITDA-MRI, leavers within the first 12 months and sickness absence days lost. The Board received regular report at each meeting which look at these as well as 'homes of concern' measures and a balanced scorecard outlining performance in key areas.

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

A task and finish group of the Board have reviewed these Signals for Success for 2026-2027 and have agreed to include new measures focusing on a range of customer satisfaction measures, colleagues satisfaction and development completions along with revised targets for the year.

3. Theme Three - Board Effectiveness

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

Roles, Responsibilities and Functions of the Board and Committees

Our company rules, Memorandum and Articles of Association and enhanced Code of Governance clearly outline the roles, responsibilities and functions of the Board and its three Committees. These were all updated in September 2025 along with our intra-group agreement to reflect the structural changes at group level including the new committee and the addition of Cube Homes to the Coterminous Board.

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

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

Committees

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

Board Composition, Selection, Appointment and Remuneration

The Board can have up to 12 Members including Executive Members at any time. Board succession is considered regularly by the Remuneration and Appraisal Committee and an annual exercise is undertaken by the Board to identify skills, knowledge and experience which exists on the Board and where there may be gaps to be filled in the future. This continues to be an effective means of identifying skills gaps on the Board and has been used as part of the recruitment of the new Chair and Non-Executive Directors.

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 biennially reviewed and benchmarked by external consultants to keep pace with the market. Emoluments are always disclosed as part of the financial reporting each year and are reported to the Remuneration and Appraisal Committee.

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. oversight with more regular reporting going forward.

Conduct of Business

Great Places conducts all Board and Committee meetings effectively, as endorsed by our maintained G1 rating at our most recent Regulatory Inspection in 2024. An annual process for reviewing the effectiveness of not just individuals, but also Board and Committees more generally is conducted; and actions for improvement are acted upon. The annual governance calendar is agreed up to 6 months before year end and an urgency process can be used if decisions are required between meetings. Meeting papers are published in advance giving the Board sufficient time to read them and make comments and observations using the online system. Each meeting also has a standing item allowing the Board to comment on the effectiveness of the meeting, changes to the risk profile resulting from decisions made in the meeting and add suggestions for improvement.

Appraisal, Review and Learning

The Board undertakes a formal, annual review of its performance and effectiveness; and this is supported by a Triennial Review of our Governance arrangements by an external organisation. All Board Members receive an induction to the business, along with ongoing opportunities for learning including topic sessions, away days, access to conferences and events as well as internal opportunities for improving profile and getting to know the business. A comprehensive appraisal process is carried out with peer-review every two years, with a scaled-back version on an annual basis. The results of these are reported back to the Board and an action-plan developed.

Compliance with the NHF Code of Governance

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

Positively, we are compliant with all provisions in the Code of Governance. However we continue to strive for excellence and are always looking at ways we can continue to meet and exceed the requirements of the Code.

4. Theme Four – Control and Assurance

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

Audit, Compliance and the Audit and Assurance Committee

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

The Committee has responsibility for reviewing all internal audits throughout the year, as well as considering the effectiveness of internal audit arrangements and the re-procurement of internal audit. The Committee provides robust challenge to the auditors, as well as to the Executive Team and colleagues where there are concerns or adverse findings and have routinely asked for follow up reports to be provided between scheduled meetings.

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

Risk

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

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

Whistleblowing

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

Appendix A - Evidence List

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

No.	Document	Purpose
1.1	Corporate Plan	This outlines the vision for the organisation.
1.2	Transforming for the Future – 10 year ambitions	This is Great Places' ambition statement for 2026-2036.
1.3	Great Places Values	These are the articulated values of the organisation.
1.4	GREATER Operating Culture	This is the stated operating culture of the organisation.
1.5	Insight Scrutiny Reports	These demonstrate resident input and a direct link to the Board.
1.6	Customer Experience Dashboard Reports	These demonstrate resident focus and how the Board have sight of complaints and compliments.
1.7	Customer Experience Strategy	This outlines how we optimise customer experience as well as our approach to ensuring equality, diversity and inclusion.
1.8	Intra Group Agreement	This document articulates how the different entities of the Group work together.
1.9	Annual Declarations of Interest report and Register of Interests.	This demonstrates transparency, openness and accountability.
1.10	Shareholders Register	This captures our key shareholders who are invited to AGMs and EGMs as required.
2.1	CEO Nominated Deputy Policy	Demonstrates that there is a robust process in place to ensure continuity in the event of CEO absence.
2.2	Diverse Activities Report (including structure)	Demonstrates that there is constant review of our structures, activities and potential improvements.
2.3	Value for Money Strategy	Demonstrates that we maintain a focus on value for money, efficiency and financial sustainability.
2.4	Carbon Management Strategy	Demonstrates our focus on environmental issues and reaching zero-carbon and improving energy efficiency.
2.5	Social Value summary	Demonstrates our commitment to delivering profit for a purpose and our focus on social sustainability issues facing residents and communities.
2.6	Asset Management Strategy	Demonstrates our commitment to maintaining good homes and continuous improvement of our stock.
2.7	One Voice and Staff Forums	Demonstrates that we involve our workforce, including groups with protected characteristics specifically, to get views, feedback and opinions on the business.
2.8	Pulse Survey Results 2025	Demonstrates our ongoing commitment to understanding how colleagues feel throughout the year and where there is more work to do.
2.9	Scheme of Delegations	Demonstrates the delegated authority to the Chief Executive, as specified in the Code.
2.10	Altair Triennial Governance Review and Board Remuneration review.	Demonstrates that the organisation takes external advice on structures and governance arrangements on a regular basis, as well as ensuring we are keeping pace with the market on Board remuneration.
2.11	Executive Remuneration Policy and Appraisal Policy	Demonstrates that the processes for the appraisal and remuneration of the Chief Executive are formalised in corporate documents.
2.12	Board Members Complaints and Grievances Policy	This document sets out how complaints can be raised against, or between, Non-Executive Directors.

No.	Document	Purpose
2.13	People Strategy	Demonstrates the organisation's commitment to the workforce, to recruit, retain, develop and support them.
2.14	Balanced Scorecard, KPI's and Critical Success Factors	Demonstrates the processes by which the Executive and Board maintain a strong overview of performance within the organisation, particularly on key measures.
3.1	Code of Governance	Our enhanced Code of Governance supplements the NHF Code with local provisions which govern the specific running of Board and Committees
3.2	Terms of Reference, Schedule of Reserved Matters and Scheme of Delegations	The Terms of Reference for each Committee make clear their functions and powers. The Schedule of Reserved Matters outlines those functions that can only be carried out by Board and the Scheme of Delegations shows those which can be delegated.
3.3	Role Profiles	Each role on the Board has its own profile which confirms their responsibilities and accountabilities.
3.4	Deed of Appointment	The NED Deed of Appointment covers expected behaviours and requirements of the role.
3.5	Board Succession, Recruitment and Development Policy	This explains the Board's approach to managing succession and recruitment, as well as the ongoing development of Members during their tenure.
3.6	Board Appraisal Policy and Process	This Policy explains how the appraisal processes are carried out annually, as well as the in-depth biennial process which includes peer-review.
4.1	Risk Register, Watch List and Deep-Dives	Our risk register and watch list are updated on a dynamic basis to ensure they always remain current. Biannual deep dives into specific risks also take place to give stronger focus to areas of concern. The watch list identifies new and emerging risks to remain on Committee and Boards radar.
4.2	Statutory Accounts	The annual statutory accounts include statements of compliance with the governance and financial viability standards, economic and consumer standards, all relevant law and this code of governance.
4.3	Annual Internal Audit Plan and Quarterly Update Reports	Our annual audit plan is developed based on the audit universe and key areas for scrutiny on a cyclical basis. Quarterly updates are presented to the Committee.
4.4	Independence of External Auditors Policy	This policy ensures that additional work undertaken by External Auditors is permitted by the FRC Ethical Standard and is within agreed financial limits.
4.5	Risk Appetite Statement	Reviewed annually by the Board, the Board considers both our overall risk appetite, as well as individual risk appetite against a number of domains.
4.6	Building and Customer Safety Reports	This regular report to Board provides continuous assurance on our approach to building and customer 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 2026-2027

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 carry out our Triennial Governance Review in late 2026, followed by a focused action plan to embed accepted recommendations.
2	We will carry out an internal audit on Fraud and Probity in June 2026 ensuring the new ECCTA requirements are embedded within the organisation.
3	We will commence the process of Board skills assessment in early 2027 in advance of the recruitment of two new Non-Executive Directors to replace outgoing members.
4	We will continue to upskill the Non-Executive Directors throughout the year in key areas including Health and Safety and Equality, Diversity and Inclusion.
5	We will ensure that there are continued opportunities for NEDs to engage with colleagues, attend conference and events and grow internally as part of succession planning.
6	We will review the first full year of the Growth Committee and identify any necessary changes to the terms of reference and forward plan as required, with input from the Triennial Governance Review.
7	We will change our forward planning process to cover the financial year rather than the calendar year and look to streamline and improve our Board packs to ensure they are succinct and more visually appealing.

