

Transparency and Accountability Statement of Intent

NCHA Transparency and Accountability Statement of Intent

Responsible Officer: Paul Moat
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1. Background

- 1.1 This statement sets out how NCHA is accountable to our customers and stakeholders and is the main means by which the Board, Chief Executive and Executive Team ensure that our business is undertaken in a transparent, responsive and proper manner.
- 1.2 The statement establishes the key mechanisms for demonstrating these accountabilities whether through formal reporting structures, use of committees or consultative groups or through internal procedures and processes. It describes the internal roles and responsibilities of key groups and individuals and demonstrates a clear audit trail of delegation and decision-making. It also sets out how NCHA will be as transparent as possible within legislative requirements.
- 1.3 The accountabilities, along with our financial and other regulations, are designed to ensure that the mission, vision and core values of NCHA are met in full.

2. Mission, Vision and Core Values

- 2.1 **Mission:**
"TO PROVIDE HIGH QUALITY LOW COST HOUSING, SERVICES AND SUPPORT FOR MORE PEOPLE IN NEED. We concentrate our resources on people and communities and include housing care and support in our work."

In addition, we have a '**Commercial Purpose**', which we deliver through our subsidiary Pelham Homes, which has the key strategic objective of generating profit for the purpose of reinvestment into the Groups vision.

Underpinning everything the Association does is a commitment to equality and diversity, value for money, social responsibility, adding social value as well as upholding our corporate values of:

- Caring – we care about what we do and the way we do it
- Lean - We learn, improve and change to deliver great services for customers –
- Enthusiastic - We are engaged and motivated to make a difference
- Accountable - We are answerable for what we do and don't do
- Resilient - We are ready to respond to opportunities and challenges

3. Governance and Governance Structures

- 3.1 NCHA's legal status is a Community Benefit Society, Homes England registered and a charitable organisation. The Association has adopted Rules as drafted by the National Housing Federation which governs the objects, powers and obligations of shareholders, Board Members and the Association.
- 3.2 The Association is governed by the NCHA Board made up of up to 12 independent members including a tenant Board Member. The Board contains a mix of skills, experience, competencies and knowledge and is well balanced in terms of equality and diversity.
- 3.3 Certain other matters are delegated by NCHA's Board to Audit Committee, Governance Committee, Care Committee and the Complaints Committee.
- 3.4 Pelham Homes is a separate company within the NCHA Group with its own Board responsible for the non-charitable, commercial activities of the company.
- 3.5 NCHA is sole corporate trustee of Nottingham Community Almshouse Charity which comprises a number of constituent charities and is also trustee of Blyth Cottages Charity, Warners Almshouse Charity, Henry Brown Almshouse Charity and the Nottingham Annuity Charity. NCHA is also the parent company of Nottingham Community (Second) HA which is a registered, non charitable, housing association.
- 3.6 In addition, see Appendix 1 - NCHA Group Structure.

4. Group Corporate Plan and Key Objectives

- 4.1 Our corporate plan is based on our corporate vision of 'More Homes, Great Services, Better Lives'.
- 4.2 Key Commitments - in order to deliver our Corporate Plan we have a number of commitments which will assist us to achieve our vision:
- A commitment to growth and an appetite to provide new homes and new services for NCHA and others. **(More homes)**
 - A commitment to tenant, service user and stakeholder involvement, coupled with a person centred approach that ensures our services are what people want and are the best they can offer. **(Great services)**
 - A commitment to protect our financial viability by operating within loan covenants and generating surpluses each year to invest in new and existing homes. We will also invest in new and improved services for our tenants and service users, while always ensuring these services are financially sustainable and demonstrate clear value for money. **(Great services)**

- A commitment to provide housing, support and wellbeing services to those in the greatest need. **(Better lives)**
- A commitment to working in partnership with others where this allows us to further our vision, accords with our values and purpose and does not put our financial strength at risk **(More homes, great services, better lives)**

5. Accountability to:

- Residents, Tenants and Service Users
- Customers and staff
- Regulators, inspectors and commissioners
- Company regulations
- Stakeholders
- Shareholders

5.1 Customers

- 5.1.1 NCHA has a range of informal and formal mechanisms for tenant, resident and service user involvement. These are detailed in the Homes and Wellbeing Annual Strategy,
- 5.1.2 Tenant Involvement is assessed annually through an Impact Assessment and every 3 years by the TPAS accreditation process.
- 5.1.3 The formal Tenant Involvement structure has a main group, the Collective Panel that oversees Tenant Involvement activities and influences strategic and corporate matters of NCHA. Linked to the Collective Panel are a series of CAP groups - Customer Advisory Panels that meet regularly to discuss and review the services and performance of NCHA. There are 4 Regional Forums: Ollerton, Nottingham, Leicester and Northamptonshire and 2 service specific CAPs: Technical Services, and Tenancy Services. A Policy Group reviews all proposed changes to policies and service standards.
- 5.1.4 NCHA purchased a Community Vehicle in 2015. This is used for events in the community. More resources are being put to informal events in which contact is made with more tenants.
- 5.1.5 A STAR survey is undertaken every two years and an Action Plan is then developed with residents. NCHA Care and Support complete a separate satisfaction survey annually for all service users, both tenants and non tenants as well as exit interviews with all service users as they move on from our services
- 5.1.6 Informal mechanisms include focus groups, telephone surveys and residents who will read and feedback on new policies and procedures.
- 5.1.7 There is a feedback system called "Praise and Grumble" and the feedback is used to improve service delivery.

5.1.8 Additionally, NCHA has established a Service Improvement Team of involved residents who undertake service quality reviews to check that our published service standards are being adhered to as well as other relevant policies such as complaints and compensation.

5.2 **Resident Scrutiny Panel**

5.2.1 NCHA has established a Resident Scrutiny Panel to scrutinise performance and recommend improvements to services. The panel explores several issues each year and their findings are presented to NCHA's Board.

5.2.2 The Resident Scrutiny Panel (RSP) is NCHA's response to greater co-regulation with our residents in partnership. The RSP is funded by NCHA with administrative support and training opportunities for members.

5.3 **Service Users**

5.3.1 Alongside the annual Satisfaction Survey of all Service Users, and exit interviews as service users move on from our services, NCHA Care and Support holds itself accountable to its Service Users on an informal basis through structures such as project or house meetings all of which are designed to ensure that all services are delivered through a person centred approach.

5.3.2 The NCHA Care Committee has a nominated 'expert by experience role' which is designed for an individual who is a current or former NCHA Care and Support service user/ resident or who has direct experience in the receipt of Adult Social Care services.

5.4 **Customers**

5.4.1 Where customers other than residents contact NCHA, for example relatives, carers and external agencies, our accountability will be demonstrated through our monitoring of our related service standards such as telephone answering, responses to correspondence, complaints, praise and grumbles and emails.

5.5 **Staff**

5.5.1 NCHA's accountabilities to its staff are formally governed by HR and Health & Safety policies and procedures. Proposals and changes covering these areas are validated by the formal Joint Union Negotiating Group (JUNG) framework.

5.5.2 Managers have responsibilities for ensuring that our duties to our staff are fully complied with. HR will assist managers in this requirement.

5.6 **Regulators, Inspectors and Commissioners**

5.6.1 NCHA has legal and contractual accountabilities to numerous external organisations and funders that are governed by a variety of mechanisms. Accountability to each body is determined by statute, code of practice, circular or contract, each with its individual requirements.

5.6.2 The Chief Executive and Executive Team are directly responsible in conjunction with the Board for ensuring these accountabilities are properly signed off: for example submission of annual returns to the Homes England and the Commissioners as part of a funding contract.

5.6.3 These accountabilities are also subject to the scrutiny of Internal and External Audit as independent verification and the inspection regimes of the various funding agencies for example Adult Social Care Commissioning Authorities.

5.6.4 Ultimately regulators such as the Homes England and the Regulator for Social Housing, HSE and CQC hold the Board responsible for compliance with all regulatory, inspection, investment and legal accountabilities.

5.7 **Company Regulations**

5.7.1 NCHA is also accountable as a company to the Financial Conduct Authority (FCA).

5.7.2 See also 6.9 which sets out the rights of shareholders to refer the Association to the FCA if they are unhappy with the way the organisation is run.

5.8 **Stakeholders**

5.8.1 Our stakeholders include Local Authorities, Homes England and the Regulator for Social Housing, Commissioners, Clinical Commissioning Groups, NHS, public agencies such as the Police and Central Government bodies such as the Ministry for Housing, Communities and Local Government.

5.8.2 Accountability to such bodies varies according to our relationship with them but will include the following:

- Contracts, Service Level Agreements or management agreements will specify how the relationship will be governed, frequency of meetings, exchange of information and returns.
- Meetings with elected members including the Leader of the Council, Executive Members for Housing or Ward members.
- Strategic level meetings attended by relevant Chief Executives / Directors of key organisations in a particular Local Authority Area.
- Responding to elected member enquiries in line with our specific policy for such enquiries ensures a swift response from a Senior Manager with the aim of doing everything to enable the elected member to help their constituent.
- Communication with local MPs.

5.9 Shareholders

5.9.1 All shareholders agree to be bound by the obligations set out in the rules. When acting as shareholders, they act at all times in the interests of the association, and for the benefit of the community, as guardians of the objects of the association which are:

"the business of providing and managing housing and social housing and providing assistance to help house people and associated facilities and amenities or services for poor people or for the relief of aged, disabled (whether physically or mentally) or chronically sick people AND any other charitable object that can be carried out from time to time by a Society registered as a provider of social housing with the regulator.

5.9.2 The Association shall not trade for profit nor shall anything be paid or transferred by way of profit to shareholders of the associations.

5.9.3 Shareholders may apply to the Financial Conduct Authority (FCA) in the following circumstances: ten shareholders can apply to the FCA to appoint an accountant to inspect the books of the association, provided all ten have been shareholders for the 12 months immediately before the application.

5.9.4 And the shareholders may apply to the FCA in order to get the affairs of the association inspected, or to call a special general meeting. One hundred shareholders or one tenth of the shareholders, whichever is the lesser must make the application.

5.9.5 The Association publishes its rules for the appointment of shareholders, and all shareholders are invited to the Annual General Meeting each year which elects 1/3 of the Board of Management each year.

5.9.6 All vacancies to the Board of Management are advertised to existing shareholders and the wider public via local and regional media and the internet. Board Members are usually appointed following an open and fair recruitment process. Board Members are accountable as shareholders and to shareholders at the AGM.

6. Delegated Authorities

6.1 NCHA delegates authority from Board through appropriate committees to the Executive team and staff through the Group's Financial Regulations and Standing orders. More detailed delegations are included in the specific policies and procedures relating to the various areas of the Groups activities.

7. Performance Monitoring and Reporting

- 7.1 NCHA's Group Corporate Plan sets out the high level KPIs to be achieved over the next 5 years. In addition there are business and individual targets set for sections and members of staff on an annual basis. These KPIs are monitored on a regular basis and performance is reported internally to the Senior Leadership Team, Executive Team, to the Board and to tenants and service users.
- 7.2 Individual members of staff are managed and their performance monitored through the Performance Management system by their line manager.
- 7.3 Homes England the Regulator for Social Housing, requires certain certification to be reported to them on an annual basis, for example, the NROSH+ process, Financial viability and self-assessment.
- 7.4 The CQC conduct detailed performance audits using a risk based approach, the results of which are published, monitored and reported to applicable stakeholders which are reported to the Care Committee as part of a suite of performance information they consider/monitor etc.

8. Internal Controls

- 8.1 There are a variety of internal controls and checks within NCHA which are designed to ensure our accountabilities are signed off in respect of:
- Financial and business risk
 - Knowing our Assets and Liabilities
 - Risk management generally
 - Service quality
 - Service delivery and standards
 - Communication - internally and externally
 - Health and Safety
 - Disaster recovery and business continuity
 - Data protection and GDPR
 - Business and Service Improvement
 - Procurement and management of supply chains
- 8.2 The internal control framework includes the following:
- NCHA Board
 - Pelham Homes Board
 - POD Board
 - Pelham Waterside Board
 - Access Training Board
 - Audit Committee
 - Care Committee
 - Risk Management Strategy and Procedure

- Risk Panel
- External and Internal Audit/assessment
- NCHA Care and Support Quality and Regulatory Compliance Team
- Service Improvement Team
- Meeting Structures, e.g. Executive Team and Senior Leadership Team
- Resident Scrutiny Panel
- Policies and procedures
- Corporate Plans and Strategies
- Budget setting and budget monitoring
- Business planning cycle
- Accounting procedures and systems
- Governance Framework
- Governance Committee
- Annual Company Secretary Checklist
- Annual Governance Action Plan
- Health and Safety Panel
- Fire Safety Group
- Care and Support Health and Safety Forum

9. Funders

- 9.1 Accountability to funders is detailed within the various loan agreements for each of the lenders to the NCHA Group. They clearly detail the specific reporting requirements on a quarterly and annual basis including compliance with loan covenants. We review the loan covenants on an annual basis and use them as part of a suite of planning tools to inform our business planning budgeting and financial projections.
- 9.2 The formal accountability requirements of the loan agreements are supported by regular meetings with representatives of our major lenders.

10. Data Protection & Technology Services

- 10.1 The new data protection legislation (GDPR & DPA2018) require us to be accountable to all our data subjects. This means we should be able to explain to any stakeholder what data of theirs we hold and why. Over the past year we have made significant progress in documenting NCHA's data and bringing our data protection documentation up to date. As well as these back office improvements, we've communicated new privacy notices and trained all staff as well as running an internal campaign reminding staff of their obligations under the new regime.

10.2 NCHA utilises a range of communication channels both digital and analogue in order to maintain effective communications with customers and external stakeholders. The Group's external communications reporting is developed in consultation with customers and colleagues.

11. Development

11.1 NCHA's Development team considers itself to be accountable to the following external agencies and organisations:

- Local Authorities
 - LA support for bids to the Homes England.
 - LA responsible for enabling role.
 - LA contribution to subsidy e.g. free land.
 - LA set policy framework for their area, and establish priority housing need.
 - Responsible for planning policies and process.

- Homes England
 - Homes England sets Government policy framework.
 - Homes England sets programme targets, grant conditions and scheme work standards for HCA funded schemes.
 - Homes England provides audit function for HCA funded schemes.

- Blue Skies Consortium
 - NCHA is joint lead, with Longhurst Group, of the Consortium, providing expertise, judgement and advice to the other member RP's. Regular consortium meetings and information on performance provide the medium of accountability which is articulated through a Consortium Agreement between the parties.

- Pitch
 - Pitch is a Development Services LLP owned 50% by Pelham Homes and 50% by Longhurst Group.
 - It provides a full development service to external clients and is accountable through a Pitch Appointment Agreement with each client.
 - It buys in staffing resources from NCHA and LG.

12. Design - Pelham Architects

12.1 The Design team offer professional services to various clients such as members of the NCHA Group (NCHA and Pelham Homes) other members of the Blue Skies Consortium as well as other external clients.

12.2 We have branded the Design team under a registered trademark, 'Pelham Architects', and deliver services to our internal and external Clients under this name.

12.3 Pelham Architects are accountable to a number of stakeholders as follows:

- NCHA Group – Pelham Architects are accountable at two levels; firstly to offer a reliable and professional service to the Group; secondly to provide a cost effective solution to the provision of professional services on the Group's development projects.
- Clients – Pelham Architects are accountable to all of its Clients. The level and nature of accountability is governed by the Terms of Appointment or Service Level Agreement.
- Other stakeholders - accountability to other stakeholders comes in many ways. For example, we are accountable to planners in terms of the quality of new designs; to neighbours of our developments in terms of how we manage the building process and so on.
- Insurers - finally we are accountable to our insurers. We need to fulfil our duty of care to our clients and avoid negligent behaviour. We also need to design risk out of schemes.

13. Maintenance

13.1 The Maintenance team provide professional services to deliver the Group's maintenance programme (responsive, relet, cyclical, planned) and also carry out some of the works utilising the Direct Maintenance Service (DMS).

13.2 Maintenance are accountable to a number of stakeholders as follows:

- Tenants, residents, service users and leaseholders - Maintenance are accountable to these customers insofar as they need to ensure that their homes are effectively maintained, safe, secure and warm places to live. There is a Technical Services CAP, with a procurement sub-CAP, in place which provides customer involvement and accountability around maintenance issues.
- NCHA Group - the Maintenance team are accountable to the Group regarding how they spend the £11m+ Maintenance budget including the procurement approach and VFM as well as meeting targets against KPIs.
- The Board and Executive Team - Maintenance need to adhere to all legislation and regulation so that the Board and Executive Team are not exposed to undue risk.
- Clients - the Maintenance team deliver services to a number of internal clients (IHT, C&S, Housing, almshouse charities) and some external clients (e.g. gas servicing to leaseholders and other almshouse charities). The level and nature of accountability is governed by the Service Level Agreement and/ or contract.

14. NCHA Care & Support

14.1 NCHA Care & Support considers itself to be accountable to the following agencies and organisations:

- Commissioners
 - Provide tendering opportunities which carry performance targets and standards to be met. Commissioning typically comes from Adult Social Care departments, Health (CCG) or possibly through joint arrangements.
- Inspection Regimes
 - Care Quality Commission (CQC) for Registered Service.
 - Health for Health contracts.
 - Adult Social Care contracts.
- Performance
 - Contract performance requirements.
- Consortium Members
 - NCHA has entered into various consortia and is jointly responsible with other members for performance standards against contract requirements. These arrangements are specified in various Consortium Agreements which set out the roles and responsibilities of the parties.
- BSI
 - Accreditation under ISO 9001 : 2008 ISO 14001, BS 18001
- Service Users (their circles of support)
 - NCHA Care & Support holds itself accountable to its service users on a formal basis through the terms of legal agreements such as tenancies, placement agreements etc. and on an informal basis through structures such as project/house meetings and a range of feedback mechanisms.

15. Marketing Communications

15.1 NCHA follows a communications approach which sets out the organisation's key objectives for communication and sharing accessible information with its customers, colleagues and key external stakeholders .

15.2 This approach focuses on ensuring that all principle stakeholders have appropriate awareness and receive a consistent message relating to:

- NCHA services
- NCHA activities and performance
- NCHA service standards
- NCHA corporate strategy (including our accountability)

16. Human Resources and Diversity

- 16.1 NCHA has adopted a People Strategy entitled "Supporting NCHA to be Fit for the Future" The Strategy is aimed at ensuring that all human resources and HR Services are managed and delivered effectively and efficiently, are aligned to achieving the Association's Corporate Strategy and Business Plan Objectives, and are customer focussed and responsive to changing needs.
- 16.2 NCHA has also adopted an Equalities, Diversity and Inclusion Strategy which is based on the Social Housing Equality framework and is delivered through departmental operational plans, aimed at ensuring that each of the Association's direct and indirect service delivery areas supports the organisation's commitment to equality of opportunity for all.
- 16.3 Performance against the priorities identified in the Social Housing Equality Framework is reported to the Board and the Executive Team. This ensures NCHA's accountability to our diverse communities is fully delivered and progress is measure against specific targets.

17. Procurement

- 17.1 NCHA is committed to cost effective and efficient Procurement and our approach is detailed in the Procurement and Value for Money Strategy.

18. Environmental Sustainability

- 18.1 Within NCHA the Energy team's accountability is outlined by the scope of work included in the Design and Environmental Sustainability Strategy. We are accountable to:
- Funders - we gain funding on the basis of meeting agreed criteria.
 - Internal clients - we are accountable to internal clients and need to deliver services as agreed with them.
 - External clients - we are targeted with improving NCHA's carbon footprint and energy efficiency and specific targets set by Government and other external agencies.
 - Tenants – we provide Home Energy Advice for our tenants with the objective of making their home as affordable as possible in terms of utilities bills.

19. Transparency

19.1 As part of NCHA's commitment to openness and transparency we will publish information about the Group on our website. Such information will be subject to Data Protection and other legislative requirements but we will aim to be as open as possible to our tenants and to our wider communities and stakeholders.

19.2 We publish the following:

- Our Service Strategies
- Our public-facing policies
- The remuneration of our Board and Executive Team together with a summary of the salaries of other staff earning over £50,000
- Expenditure over £500 on housing developments which receive grant aid funded from the Homes and Communities Agency new housing programme
- Our governance and scrutiny arrangements
- Our key governance policies
- NCHA Group Structures and lines of responsibility
- All information relating to our landlord functions and tenant relationships
- Annual Report and Group Financial Statements
- Annual Reports to tenants, service users and stakeholders
- How we Compare dashboard
- NCHA Care and Support Service User satisfaction surveys
- Speak Out Policy
- Duty of Candour requirements

This list is not exhaustive and will be reviewed on a regular basis.

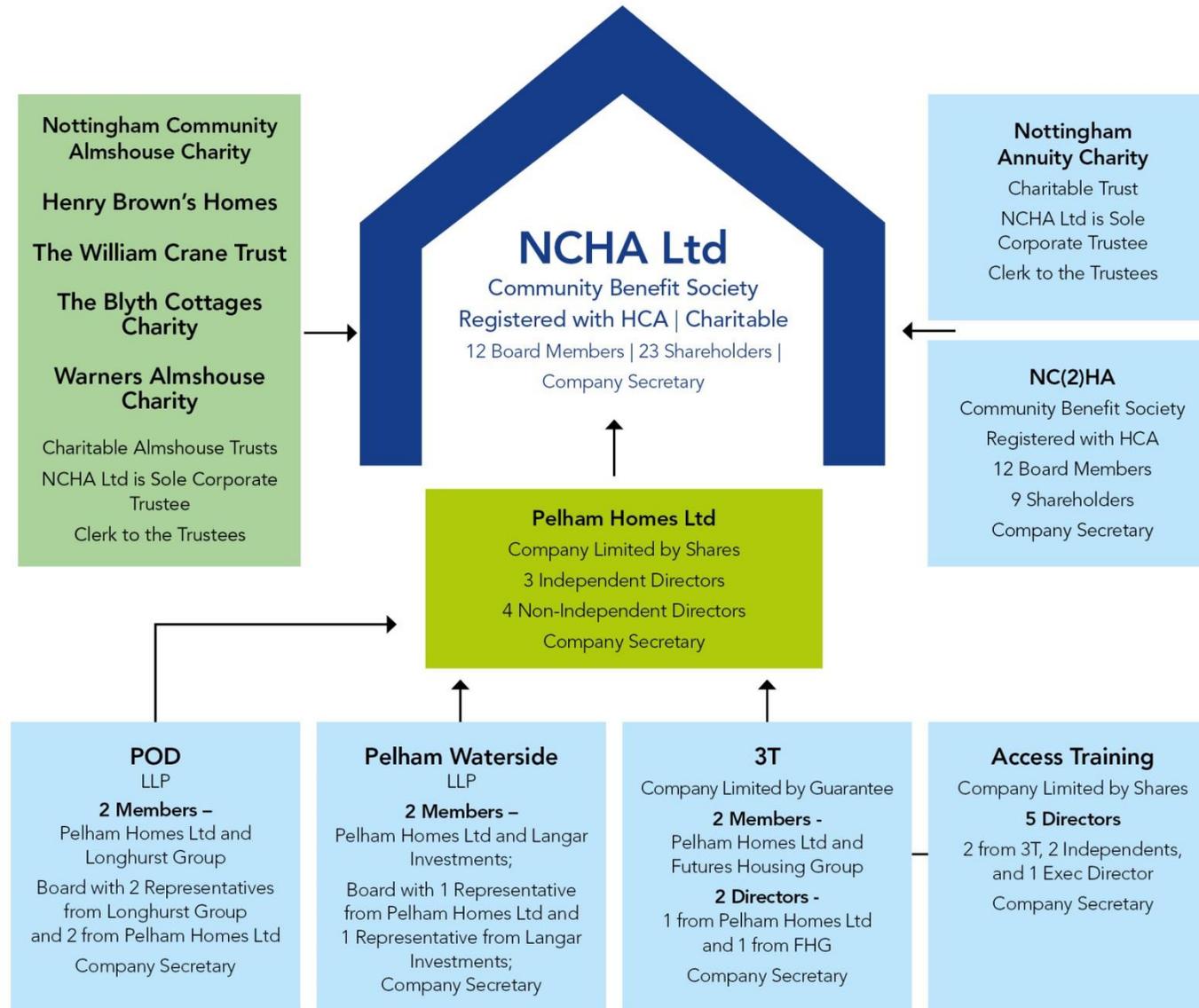
20. Conclusion – Transparency and Accountability

20.1 This statement is designed to be a working document that will be regularly reviewed and updated as the external environment changes.

20.2 It is for external and internal use as it demonstrates that NCHA is a fully accountable body in relation to everyone we interact with and that we act in an open and transparent fashion.

Appendix 1 - NCHA Group Structure Chart

NCHA Group Structure Chart



Appendix 2 - Business Unit Structures



NCHA Organisational Chart

from 1st September 2018

