

# NHF 2015 Code of Governance: compliance checklist



The Code of Governance	Compliance (Y/N) Comments:	Evidence:	Action needed:
<b>A Compliance with this code</b>			
<b>Main requirement</b>			
Organisations which adopt this code must publish an annual statement of compliance with the code in their annual financial statements, and make a reasoned statement about any areas where they do not comply.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Annual compliance checklist completed by the Company Secretary and reviewed by the board.  Annual compliance checklist is published in the transparency section of the group's website and reference is made to ongoing compliance with the Code in the annual financial statements.	Action needed: Review annual statement of compliance.
	Comments: Compliancance with the Code is reviewed annually by the board. In accordance with the provisions of the Code, a comply or explain policy is in place. Accent currently complies with all provisions of the Code.		By whom: Company Secretary
<b>Provisions</b>			
A1 Where a statement of non-compliance is needed, it must:			
(1) be published in the organisation's annual financial statements;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Annual compliance checklist completed by the Company Secretary and reviewed by the board.	Action needed: Review annual statement of compliance.
	Comments: Compliancance with the Code is		By whom: Company Secretary

	<p>reviewed annually by the board. In accordance with the provisions of the Code, a comply or explain policy is in place. Accent currently complies with all provisions of the Code.</p>	<p>Annual compliance checklist is published in the transparency section of the group's website and reference is made to ongoing compliance with the Code in the annual financial statements.</p>	<p>By date: June 2016</p>
<p>(2) be specific to the particular circumstances of the organisation;</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Annual compliance checklist completed by the Company Secretary and reviewed by the board. Annual compliance checklist is published in the transparency section of the group's website and reference is made to ongoing compliance with the Code in the annual financial statements</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: Compliance with the Code is reviewed annually by the board. In accordance with the provisions of the Code, a comply or explain policy is in place. Accent currently complies with all provisions of the Code.</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
<p>(3) explain why and how the principles of good governance are being upheld;</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Full commentary provided in the annual report on accounts.</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: A full commentary on the corporate governance framework is provided in the annual report on accounts. This sets out Accent's approach to good governance and demonstrates compliance.</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
<p>(4) set out in summary any plans for the achievement of compliance with the code.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Full commentary provided in the annual report on accounts.</p>	<p>Action needed: Review annual statement of compliance</p>

	<p>Comments: Any areas of non-compliance with the code would be detailed in the annual report on accounts. This section would also detail reasons for non-compliance along with appropriate improvement actions and timeframe for completion.</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
<p>A2 Where the formal constitution of an organisation conflicts with this code, the constitution must take precedence.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Formal constitution based on NHF model rules. These have been reviewed by NHF and HCA prior to approval.</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: No conflict between formal constitution and code. Formal constitution based on NHF model rules.</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
<p><b>B Constitution and composition of the board</b></p>			
<p><b>Main requirement</b></p>			
<p>The board must be effective in the strategic leadership and control of the organisation and act wholly in its best interest. Board members must ensure that the interests of the organisation are placed before any</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Standing agenda item of declaration of interest at each board and committee meeting</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: Robust framework for</p>		<p>By whom: Company Secretary</p>

<p>personal interests.</p>	<p>monitoring conflicts of interest in place. This includes:-          Standing agenda item of declaration of interest at each board and committee meeting          Annual declaration from all board and committee members to ensure any conflicts continually reviewed and mapped on formal conflict register.</p>	<p>Annual declaration from all board and committee members to ensure any conflicts continually reviewed and mapped on formal conflict register.</p>	<p>By date:          June 2016</p>
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Provisions			
B1 The core purpose of the board is to determine vision and strategy, direct, control, and scrutinise an organisation's affairs. Where the organisation has staff, operational management of the organisation must be delegated to them, and the board must hold them to account.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Standing orders and terms of reference clearly set out role of the board and matters delegated to the CEO. This have been recently reviewed in April 2015.	Action needed: Review annual statement of compliance
	<p>The board review and approve the Group Strategic Plan which sets the strategy for the group. A new 6 year business plan for 2014/20 was approved in March 2014. An annual business plan implementation plan is reviewed on a quarterly basis.</p> <p>Standing Orders and Terms of Reference are in place that set out a formal delegation to the executive team for running the day to day business and matters that are reserved only for the board.</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
B2 All members of the board, executive and non-executive, share the same legal status and have equal responsibility. Each must act only in the interests of the organisation and not on behalf of or representing any	Yes <input type="checkbox"/> No <input type="checkbox"/>	Evidence: Formal board and committee member induction NED code of conduct Annual NED declaration of	Action needed: Review annual statement of compliance
	<p>Comments: The board and committee</p>		By whom: Company Secretary

<p>constituency or interest group. Board members must ensure that the interests of the organisation are placed before any personal interests, whether commercial or otherwise.</p>	<p>member induction process makes specific reference to NEDs statutory and fiduciary duties to avoid conflicts of interest. Formal one to one session outlines duties and responsibilities for all individuals involved in board and/or committee decisions.</p> <p>A NED code of conduct sets out the responsibilities of all board and committee members. This is formally acknowledged in the individual members service contract and annual declaration.</p>	<p>interest NED interest register maintained Formal contract for service</p>	<p>By date: June 2016</p>
<p>B3 It is for each organisation to decide on its best board composition; in the case of a subsidiary within a group, this may be a matter for the group parent organisation.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Comments: A full skills matrix is maintained and reviewed on an annual basis following the annual appraisal process. An overview of the skills required by the board and where the board meets these skills requirements is annually reviewed by the board. All recruitments to fill vacancies on the boards and committees is with direct reference to the skills matrix.</p>	<p>Evidence: Full board and committee skills matrix Annual NED skills audit Annual review to ensure board skills requirement remains fit for purpose</p>	<p>Action needed: Review annual statement of compliance</p> <p>By whom: Company Secretary</p> <p>By date: June 2016</p>

B4 Board members who are executive staff must be in a minority. Boards should have at least five members and no more than twelve, including any co-optees and any executive board members.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Constitutional document requirement to have independent NED majority in all entities across Accent.	Action needed: Review annual statement of compliance
	Comments: There is only one co-opted board member on the Accent Group and RP boards. ARCP has two co-opted executive members but in all cases this represents a minority of all operational boards. All rules have specific reference that not more than a third of the board can be staff members.		By whom: Company Secretary
			By date: June 2016

B5 A majority of those present must be non-executive board members for a board meeting to be quorate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Constitutional document requirement to have independent NED majority in all entities across Accent.	Action needed: Review annual statement of compliance
	Comments: There is only one co-opted board member on the Accent Group and RP boards. ARCP has two co-opted executive members but in all cases this represents a minority of all boards. It would not be possible to form a quorum with a NED majority. All rules have specific reference that not more than a third of the board can be staff members.		By whom: Company Secretary
B6 The roles of chair (and vice chair or senior independent director, if there is one) of the board and main committees must not be held by an executive.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Both the role of Chair and Senior Independent Director are held by NEDs.	Action needed: Review annual statement of compliance
	Comments: Both the role of Chair and Senior Independent Director are held by NEDs.		By whom: Company Secretary
B7 The board must appoint a company secretary (or a person with that function) with a clear accountability to the board, to advise it on compliance with the organisation's constitution, this code, and other statutory or regulatory requirements particularly as relating to their position as board members, company directors, and/or charity trustees as applicable.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Appropriately qualified Company Secretary in place with clear remit direct to Board.	Action needed: Review annual statement of compliance
	Comments: Appropriately qualified Company Secretary in place with clear remit direct to Board.		By whom: Company Secretary
			By date: June 2016



B8 Organisations with shareholders who elect the board must review their policies for admission to shareholding membership on a regular basis and with a view to supporting compliance with this code.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Not Applicable for Accent as closed shareholdind in operation	Action needed: Review annual statement of compliance
	Comments: Not Applicable for Accent as closed shareholdind in operation		By whom: Company Secretary
			By date: June 2016

## C Essential functions of the board

### Main requirement

Each board must be clear about its duties and responsibilities. These must be formally recorded and made available for all existing and potential board members. Each board must be headed by a skilled chair who is aware of his or her duties as leader of the board.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<b>Evidence:</b> All board and committee members receive a full pack containing Rules of Association/ Terms of Reference & Standing Orders/Service Agreement/ Code of Conduct/Role description All the information is also available on the group's intranet in the secure NED section which acts as a board and committee member handbook.	<b>Action needed:</b> Review annual statement of compliance
	<b>Comments:</b> All board and committee members receive a full pack containing Rules of Association/ Terms of Reference & Standing Orders/Service Agreement/ Code of Conduct/Role description. This information is discussed in a one to one session as part of the induction process to ensure that NEDs are fully aware of their duties and responsibilities. Ongoing help and support is available via the Company Secretary All the information is also available on the group's intranet in the secure NED section which acts as a board and committee member handbook.		<b>By whom:</b> Company Secretary
<b>By date:</b> June 2016			

### Provisions

C1 The essential functions of the board must be formally recorded. In addition to matters set out in law and in the organisation's constitution these will include as a minimum:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<b>Evidence:</b> Rules of Association Standing Orders Terms of Reference	<b>Action needed:</b> Review annual statement of compliance.
	<b>Comments:</b> The board's essential		<b>By whom:</b> Company Secretary

	<p>functions are clearly detailed in both the Rules of Association and the Standing Orders which incorporate the Terms of Reference where matters that are reserved only for the board are clearly stated. The Rules of Association were reviewed in 2014 and the Standing Orders/Terms of Reference were reviewed in April 2015 to ensure that they continue to meet the needs of the business.</p>		<p>By date: June 2016</p>
<p>(1) setting and ensuring compliance with the values, vision, mission and strategic objectives of the organisation, ensuring its long-term success;</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Annual board and committee member conference</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: The board annually review the Group Strategic Plan at the Board and Committee Member conference. This session is used to ensure that the values and strategic objectives of the group remain valid and can be amended if necessary. Bi-annual business plan review meetings are also held by the board. The CEO's report to all board meetings highlights any deviation from annual business plan implementation progress.</p>	<p>Bi-annual business plan review meeting CEO update at each meeting reviewing annual business plan implementation progress</p>	<p>By whom: Company Secretary By date: June 2016</p>

(2) setting a positive culture, with strong customer focus;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Quarterly key results report Customer service committee terms of reference with clear focus on performance improvement.	Action needed: Review annual statement of compliance
	Comments: The board receives quarterly performance report from all areas of the business. The board utilise this opportunity to robustly challenge performance and customer focus. The board has created five customer service committees whose sole focus is challenging local service.		By whom: Company Secretary  By date: June 2016

(3) ensuring that the organisation operates effectively, efficiently and economically;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Annual value for money assessment report produced. Financial reports received at all board meetings.	Action needed: Review annual statement of compliance
	Comments: The board reviews the annual value for money report. Each meeting receives management accounts, treasury report and quarterly performance report. This information is utilised to challenge financial performance and drive efficiencies.		By whom: Company Secretary By date: June 2016
(4) providing oversight, direction and constructive challenge to the organisation's chief executive and executives;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Chair meets quarterly with CEO to discuss CEO performance and that of wider executive team.	Action needed: Review annual statement of compliance
	Comments: Chair meets quarterly with CEO to discuss CEO performance and that of wider executive team. All the executive team attend the board meeting to present their individual directorate reports. All papers are issued a minimum of a week in advance to facilitate support and constructive challenge to the executive team.		By whom: Company Secretary By date: June 2016
(5) the appointment and if necessary the dismissal of the chief executive;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Rules of Association and Terms of Reference both set out clear provisions for appointment and if necessary	Action needed: Review annual statement of compliance.
	Comments: This is a specific requirement		By whom: Company Secretary

	in both the Rules of Association and Standing Orders that the employment and dismissal of the CEO is reserved for the board.	dismissal of the CEO.	By date: June 2016
(6) satisfying itself as to the integrity of financial information, approving each year's budget, business plan and annual accounts prior to publication;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Management accounts and financial update reports presented at each board meeting. Extensive multi-variant stress testing held at board away days to challenge the financial plan.	Action needed: Review annual statement of compliance
	Comments: The board receive management accounts and financial updates at each board meeting. All budgets and business plans are approved by the board in March each year. As part of the June meetings cycle the board review and approve the annual accounts for adoption by the shareholders. A detailed analysis of annual accounts is undertaken by the group audit committee prior to board signoff. Extensive multi-variant stress-testing of the financial plan and its assumptions is undertaken regularly by the Board in line with regulatory requirements.		By whom: Company Secretary
(7) establishing, overseeing and reviewing a framework of delegation and systems of internal control; and	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Internal controls framework	Action needed: Review annual statement of compliance
	Comments: Formal Internal Controls		By whom: Company Secretary

	Framework in place. This is reviewed annually by the group audit committee.		By date: June 2016
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(8) establishing and overseeing a risk management framework in order to safeguard the assets and reputation of the organisation.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Risk management framework in place	Action needed: Review annual statement of compliance
	Comments: A risk management framework is in place and forms part of the internal controls framework. This is also reviewed annually by the Audit and Assurance Manager, CEO and the group Audit Committee The board reviews strategic risks at each board meeting to challenge the risk and control assumptions.		By whom: Company Secretary
C2 The board must formally record a schedule of those essential functions and other significant matters which are specifically reserved for the board's decision and which cannot be delegated.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Standing orders	Action needed: Review annual statement of compliance
	Comments: A specific section in the Standing Orders of the board details matters that are reserved for the board.		By whom: Company Secretary
C3 The board of a parent organisation in a group structure must ultimately have the responsibility and the clear powers to direct and if necessary intervene in the governance of its subsidiaries.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Rules of Association Intra Group Agreement Closed shareholding	Action needed: Review annual statement of compliance
	Comments: The governance framework		By whom: Company Secretary



	<p>within the group, specifically the Rules of the Association and Intra Group Agreement ensure that the group board retain control across the group. All legal entities within Accent now operate a closed shareholding. Any risk is now mitigated by the virtual board structure which ensures that with effect from January 2013 the same board is appointed to the Accent Group Ltd board and all RP boards within the group.</p>		<p>By date: June 2016</p>
<p>C4 The board of the parent organisation must determine how and whether this code should apply to each of its subsidiaries.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Commentary on the corporate governance framework is provided in the annual report on accounts</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: Accent operates within the core principles of the Code across the group. This is demonstrated by the full commentary on the corporate governance framework is provided in the annual report on accounts</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
<p>C5 The constitutional relationship and arrangements between parent and each subsidiary must be formally recorded.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Intra Group Agreement Rules of Association</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: The governance framework</p>		<p>By whom: Company Secretary</p>

	within the group, specifically the Rules of the Association and Intra Group Agreement sets out the relationship and arrangement between the parent and the subsidiaries.		By date: June 2016
C6 The board of the parent organisation must approve the group's plans and budgets, and hold the subsidiary boards accountable for delivery of their objectives.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Intragroup agreement	Action needed: Review annual statement of compliance
	Comments: The board approve the annual budget and business plan each year. This is a key principle of the Intragroup agreement		By whom: Company Secretary
C7 The chair is responsible for leadership of the board, and ensuring its effectiveness. The particular duties and responsibilities of the chair must be formally recorded.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Role profile Standing Orders Annual appraisal process	By date: June 2016
	Comments: Full role profile in place for the Chair along with specific reference to the Chair role in the Standing Orders. Chair is appraised annually by Senior Independent and Chair of Audit following review by the board to ensure continuing effectiveness.		Action needed: Review annual statement of compliance
<b>D Board skills, renewal and review</b>			
<b>Main requirement</b>			
Recruitment to board vacancies must be open and transparent and based on the board's considered view of the skills and attributes required to discharge its functions. The board must select or appoint new	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Open advertisement External advisor appointed	Action needed: Review annual statement of compliance
	Comments: All board and committee		By whom: Company Secretary

<p>members objectively on merit and must undertake regular appraisals of its members and of the board as a whole.</p>	<p>vacancies are advertised externally via the national housing and regional press for complete transparency.</p> <p>All appointments are against a board or committee skills matrix to ensure the correct skills are obtained.</p> <p>For high profile appointments, such as Accent board appointments, an independent advisor is appointed to ensure complete transparency and rigour in the recruitment process.</p> <p>An appraisal process sets out the requirements for all board and committee members to undertake an annual appraisal. Boards and committees are also required to undertake a self assessment to challenge their performance.</p>		<p>By date: June 2016</p>
<b>Provisions</b>			
<p>D1 Boards must have a strategy for their own renewal which is based on an agreed statement of the skills, qualifications and attributes required, and balances the need for experienced members with that for new thinking and independent challenge. This statement should be reviewed regularly, and whenever the organisation is about to undertake new activities or become exposed to new risks.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Comments: All board and committee appointments are mapped by the Company Secretary against a detailed skills matrix which is regularly reviewed.</p>	<p>Evidence: Detailed skills matrix produced for all board and committees. Succession plan in place mapping all skills.</p>	<p>Action needed: Review annual statement of compliance</p> <p>By whom: Company Secretary</p> <p>By date: June 2016</p>

D2 Maximum tenure must be agreed for all non-executives which must in total be nine years or fewer, composed of two or more consecutive terms of office. This maximum tenure must apply to all board member service with an organisation or its predecessors or its subsidiaries.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Rules of association Members service contracts	Action needed: Review annual statement of compliance
	Comments: Accent currently operate a maximum term of 9 years (three terms of three years) for any appointment at board and/or committee level within the group. In March 2015, the board re-affirmed their commitment to a nine year term for all NEDs across the group.  As part of the group's succession planning an annual review of the skills matrix is undertaken to ensure the correct skills still remain on the board		By whom: Company Secretary  By date: June 2016
D3 Where a member comes to the end of an individual term of office and is eligible for reappointment, this must be subject to consideration of the member's appraised performance and skills, and to the wider needs of the board at that time.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Skills matrix Annual NED skills audit Annual review of board skills to AGM	Action needed: Review annual statement of compliance
	Comments: The skills of individual members and the wider board are reviewed on an annual basis. This is reviewed at the AGM when board members are re-elected to ensure that the correct skills remain on the board.		By whom: Company Secretary  By date: June 2016
D4 A member who has left the board after serving the maximum tenure must not be reappointed for at least one full term of	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Rules of association	Action needed: Review annual statement of compliance

office.	<p>Comments:</p> <p>Accent currently operate a maximum term of 9 years (three terms of three years) for any appointment at board and/or committee level within the group. In March 2015, the board re-affirmed their commitment to a nine year term for all NEDs across the group.</p>	Members service contracts	<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
D5 In considering its composition and renewal the board must have regard to the need for a board which includes people from diverse backgrounds and with diverse attributes, to help ensure healthy debate and challenge, and a range of perspectives.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence:</p> <p>Open and transparent board recruitment process oversee by the nominations committee. Number of mediums utilised to ensure interest from a diverse range of backgrounds and skills sets.</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments:</p> <p>The board has a strong committment to diversity. All board recruitments are open and transparent. Recruitments are conducted to attract individuals from wide variety of backgrounds and skills sets.</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>
D6 Where the board members are elected by a wider shareholding membership, the organisation must support its shareholders so they can play an informed role in the election of board members.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence:</p> <p>Rules of association specifically state that only board members can be shareholders.</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments:</p> <p>Accent currently operates a closed shareholding policy across the group</p>		<p>By whom: Company Secretary</p> <p>By date: June 2016</p>

D7 Where the organisation's constitution provides for one or more board members to be nominated or directly elected, the organisation must ensure that those coming forward bring skills and experience that meet the needs of the board, and that they are fully aware in advance of the responsibilities that they will undertake. New board members must not be appointed without undergoing a due selection and assessment process to establish their suitability.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Rules of Association clearly state no nominated or directly elected board members. Comprehensive recruitment process in place.	Action needed: Review annual statement of compliance
	Comments: No board members are nominated or directly elected to the board. All recruitment is subject to a comprehensive assessment process that ensure suitability of all prospective candidates,		By whom: Company Secretary
D8 So they can discharge their duties all new board members must receive a properly resourced induction, and ongoing learning and development during their tenure.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Induction process Appraisal process	Action needed: Review annual statement of compliance
	Comments: Induction process reviewed and revised within the last 12 months. Formal one to one session outlines duties and responsibilities for all individuals involved in board and/or committee decisions. This includes specific reference to fiduciary duties. Training and development discussed and agreed by Chair as part of annual appraisal.		By whom: Company Secretary
D9 A full and rigorous appraisal process for the individual members of the board and its committees, including the chairs, must be carried out at least every two years.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Appraisal policy	Action needed: Review annual statement of compliance
	Comments: Annual appraisal undertaken		By whom: Company Secretary

	by board and committee members. This is subject to independent review at least once every three years.		By date: June 2016
D10 If the organisation is paying board members it must ensure that it has an objective mechanism for establishing payment levels. This will normally be the responsibility of a committee responsible for remuneration, using independent advice and benchmarking as required.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: NED benchmarked against organisations of similar size and complexity.	Action needed: Review annual statement of compliance
	Comments: NED pay is benchmarked against external organisations of similar size and complexity. The workload for all board members on the Accent board is apportioned fairly. All members chair either a Customer Service Committee or other committee of the board, except for the Senior NED whose role in supporting the Group Chair is similar in workload to the chairs of the committees		By whom: Company Secretary
			By date: June 2016

D11 Payment to non-executive board members must be:			
(1) permitted by law and by the organisation's own constitution;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Rules of association clearly permits remuneration to board members.	Action needed: Review annual statement of compliance
	Comments: All remuneration is in accordance with all relevant laws and Accent's rules of association.		By whom: Company Secretary
(2) in the best interests of the organisation;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Attendance levels Board performance assessment	Action needed: Review annual statement of compliance
	Comments: Remuneration is in accordance with median levels of pay for the size and complexity of organisation. Clear link between attendance and performance of board members where remuneration policy is in place.		By whom: Company Secretary
(3) reasonable and proportionate to the organisation's size, complexity and resources;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: NED remuneration report	Action needed: Review annual statement of compliance
	Comments: Remuneration is benchmarked to ensure it is in accordance with median levels of pay for the size and complexity of organisation.		By whom: Company Secretary
(4) linked to the carrying out of the specified duties of the post, against which performance must be reviewed;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: NED remuneration report	Action needed: Review annual statement of compliance



	<p>Comments: Remuneration is benchmarked to ensure it is in accordance with median levels of pay for the size and complexity of organisation.</p>		<p>By whom: Company Secretary</p>
			<p>By date: June 2016</p>
(5) fully disclosed on a named basis in the organisation's annual financial statements.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Annual accounts Accent website</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: Remuneration of individual NEDs is disclosed in the annual accounts and on the Accent Group website on a named basis.</p>		<p>By whom: Company Secretary</p>
			<p>By date: June 2016</p>
<b>E Conduct of board and committee business</b>			
<b>Main requirement</b>			
The board must act effectively, making clear decisions based on timely and accurate information. Committees may be established where the board determines that they will provide expertise and enable it to deliver effective governance and manage risk.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Board and committee minutes Clear standing orders and terms of reference in place Committee performance regularly reviewed</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: All board and committee meetings are clearly minuted with decisions and debate fully documented. Clear terms of reference are in place for all committees and these are regularly reviewed to ensure governance effectiveness,</p>		<p>By whom: Company Secretary</p>
			<p>By date: June 2016</p>
<b>Provision</b>			
E1 The board must have formally recorded terms of reference to ensure that its conduct is transparent, effective and in the interests of the organisation.	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>Evidence: Standing orders and terms of reference</p>	<p>Action needed: Review annual statement of compliance</p>
	<p>Comments: Formal standing orders and</p>		<p>By whom: Company Secretary</p>

	terms of reference in place. These were reviewed in April 2015		By date: June 2015
E2 Board and committee meetings should, wherever possible, be based on full agendas and clearly presented and accurate documents circulated to members well in advance of meetings. Decisions and the main reasons for them must be recorded in the meeting minutes.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Board and committee minutes	Action needed: Review annual statement of compliance
	Comments: All board and committee meetings are clearly minuted with decisions and debate fully documented.		By whom: Company Secretary
E3 Urgent decisions between board meetings must be taken in accordance with proper, formally recorded and predetermined arrangements.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Standing orders details Chair's actions process.	By date: June 2016
	Comments: Provision is made in the Standing Orders for Chairs action. Any use of this function would be reported to the next board meeting for ratification by the board.		Action needed: Review annual statement of compliance
			By whom: Company Secretary
			By date: June 2016

E4 All boards and committees must consider annually their effectiveness and how they conduct their business, including:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Appraisal process	Action needed: Review annual statement of compliance
	Comments: Board and committee effectiveness is reviewed as part of the appraisal process on an annual basis.		By whom: Company Secretary
(1) their governing instruments, delegations, regulations, standing orders, structures, systems and other formal documentation;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Major rules of association change June 2014 Standing orders and Terms of Reference reviewed April 2015	Action needed: Review annual statement of compliance
	Comments: All documentation reviewed on an annual basis		By whom: Company Secretary
(2) the timing and frequency of meetings;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Annual meetings planner reviewed	Action needed: Review annual statement of compliance
	Comments: Meetings planner and cycle of meeting reviewed on an annual basis.		By whom: Company Secretary
(3) the format of their agendas, papers, minutes and communications;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Appraisal process	Action needed: Review annual statement of compliance
	Comments: This is reviewed as part of the annual appraisal process.		By whom:
(4) their collective performance as a decision-making body;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Appraisal process	Action needed: Review annual statement of compliance
	Comments: Board and committee		By whom: Company Secretary

	effectiveness is reviewed as part of the appraisal process on an annual basis.		By date: June 2016
(5) their compliance with this code and their legal duties.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Annual legal and corporate governance review	Action needed: Review annual statement of compliance.
	Comments: Annual legal and corporate governance review completed and reported to board prior to annual account signoff.		By whom: Company Secretary
There must be a formal review of these matters at least every three years, to ensure best practice, and that documentation is compliant with the latest legislation and regulations.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Annual legal and corporate governance review	By date: June 2016
	Comments: Annual legal and corporate governance review completed and reported to board prior to annual account signoff.		Action needed: Review annual statement of compliance
E5 The chair of the board must not chair the committee responsible for remuneration, nor that responsible for audit.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Separate Chair's in place for both remuneration and audit committee.	By whom: Company Secretary
	Comments: Chair does not Chair either of these committees		Action needed: Review annual statement of compliance
E6 Paid staff of an organisation must not be members of the committees responsible for nominations, remuneration, audit or risk.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Committee membership	By date: June 2016
	Comments: No paid staff are members of any committee		Action needed: Review annual statement of compliance
			By whom: Company Secretary
			By date: June 2016

E7 Each committee must have formally recorded terms of reference approved by the board, and must report regularly to the board on its work and the exercise of any delegated authority it has been given.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Terms of reference approved by board and in place.	Action needed: Review annual statement of compliance
	Comments: Formal terms of reference in place for all committees.		By whom: Company Secretary
			By date: June 2016

## F Audit and risk

### Main requirement

The board must establish a formal and transparent arrangement for considering how the organisation ensures financial viability, maintains a sound system of internal controls, manages risk and maintains an appropriate relationship with its auditors.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Business Assurance Team programme Group strategic risk map	Action needed: Review annual statement of compliance
	Comments: The Audit Committee annually reviews the internal controls within the group to ensure that they remain fit for purpose. The business assurance team produce and annual programme to provide scrutiny to the business which is regularly reviewed by the Audit Committee. The group strategic risk map is reviewed each quarter by the board to constantly reassess risk and controls that the business has in place.		By whom: Company Secretary
			By date: June 2016

Provisions			
F1 There must be effective internal controls and appropriate systems for business assurance, so that the board can have confidence in the information it receives.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Internal controls framework in place Annual review of internal controls	Action needed: Review annual statement of compliance
	Comments: Internal Controls Framework is reviewed annually to ensure fit for purpose as part of the year end process by Audit and Assurance Manager, CEO and Audit Committee.		By whom: Company Secretary By date: June 2016
F2 The organisation's external auditors must be independent and effective.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: External audit function reviewed and competitively tendered in Summer 2014	Action needed: Review annual statement of compliance
	Comments: External auditors are subject to an annual assessment as part of the year end process. External audit function is tendered on an 5 year basis with review annual subject to satisfactory annual performance. The external audit function tender process was tendered in Summer 2014.		By whom: Company Secretary By date: June 2016
F3 All but small non-developing organisations must have a committee primarily responsible for audit, and arrangements for an effective internal audit function. Other organisations must make effective arrangements for discharging these functions.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Audit Committee in place with formal terms of reference setting out clear delegated authority levels.	Action needed: Review annual statement of compliance
	Comments: Audit Committee in place with formal terms of reference setting out clear delegated authority levels.		By whom: Company Secretary By date: June 2016

F4 The committee responsible for audit must bring independent scrutiny and challenge to provide the board with assurance, and exercise oversight of the internal and external audit functions.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Committee composition Independent audit committee member	Action needed: Review annual statement of compliance.
	Comments: Committee membership ensures that Audit Chair is not appointed to any other group committee ensuring complete independence. An independent member of the Audit committee with appropriate audit and financial skills is in place.		By whom: Company Secretary  By date: June 2016
F5 The committee responsible for audit must meet regularly and its minutes must be available to all members of the board. The reasons for the decisions taken must be recorded in the minutes and presented to the board for noting or endorsement.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Formal meetings planner All committee papers and minutes available via Accent's intranet  Full update on committees activities provided to following board meeting.	Action needed: Review annual statement of compliance
	Comments: The board's audit committee meets as part of the formal meetings programme. Additional ad hoc meetings would be facilitated if required. All papers and minutes are available to the board via Accent's intranet. A full update is provided to each board meeting on the committee's activities.		By whom: Company Secretary  By date: June 2016
F6 The committee must be able to meet with the external auditors without executives or other paid staff being present at least once a year.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Private meeting with the Audit Committee and external auditors held annually as part of the year end accounts	Action needed: Review annual statement of compliance
	Comments: Private meeting with the Audit		By whom: Company Secretary

	Committee and external auditors held annually as part of the year end accounts approval process.	approval process.	By date: June 2016
F7 The chair of the committee responsible for audit must either be a member of the board or have clear arrangements for reporting to the board.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Chair of the Committee is an independent non-executive member of the board	Action needed: Review annual statement of compliance
	Comments: Chair of the Committee is an independent non-executive member of the board		By whom: Company Secretary
F8 The voting members of the committee responsible for audit must not include the chair of the board or any executives.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: The composition of the audit committee is drawn solely from independent non-executive directors	By date: June 2016
	Comments: The composition of the audit committee is drawn solely from independent non-executive directors		Action needed: Review annual statement of compliance
F9 The board must identify and regularly review the individual and combined material risks faced by the organisation and make plans and strategies to mitigate and manage them effectively.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Quarterly reporting of group strategic risk map. Annual risk assessment and risk appetite review completed.	By whom: Company Secretary
	Comments: The board reviews the strategic risk map on a quarterly basis. The board annually undertakes a full risk assessment and risk appetite review.		Action needed: Review annual statement of compliance
F10 The board must retain overall responsibility for risk management, and determine the organisation's tolerance of risk. The board may delegate the detailed scrutiny and evaluation of risk to the	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Detailed directorate risk maps in place. Audit Committee approve and oversee the implementation of	By date: June 2016
	Comments:		Action needed: Review annual statement of compliance
			By whom: Company Secretary



committee responsible for audit, or to another committee.	See compliance detailed in F9. In addition the detailed directorate risk maps are reviewed quarterly by the relevant leadership team members in conjunction with business assurance team. The Audit Committee approve and oversee the implementation of the annual Business Assurance programme.	the annual business assurance programme.	By date: June 2016
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## G The chief executive

### Main requirement

There must be clear working arrangements between the board and the chief executive and clear delegation of authority.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Standing orders and CEO JD clearly set out working arrangements and delegation to the CEO.	Action needed: Review annual statement of compliance
	Comments: Clear division of duties and delegation of powers are set out in the boards' standing orders documentation and the CEO's job description. The Group Chair formally meets the CEO at least monthly and has a fortnightly update telephone conference. The CEO's performance is formally appraised each year and any issues would be addressed as part of that process.		By whom: Company Secretary
			By date: June 2016

Provisions			
G1 The chief executive must be clear about the essential duties of the role and have clarity over his or her legal responsibilities, delegated authority and relationship with the board.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Role is set out in the CEO's job description and delegation of authority is set out in the Standing Orders of the board.	Action needed: Review annual statement of compliance
	Comments: Total clarity on the role of the CEO. Role is set out in the CEO's job description and delegation of authority is set out in the Standing Orders of the board.		By whom: Company Secretary
G2 Like all other employees, the chief executive must have a written and signed contract of employment; the board must consider whether it should be reviewed at least every three years.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: CEO has formal written contract of employment. The terms of this were last reviewed in 2015.	Action needed: Review annual statement of compliance.
	Comments: Chief Executive has a formal written contract of employment that is signed and subject to three months written notice as is the case for any other executive or senior manager within Accent . The board reviewed this notice period in 2015 and considered it appropriate.		By whom: Company Secretary
			By date: June 2016

G3 Periods of notice of more than six months and other provisions for material payments to be made or benefits granted in the event of the contract being terminated must be specifically approved by the board with the reasons for the decision clearly minuted.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: CEO signed contract of employment states three months notice. Standing orders of the board specifically reserves all matters regarding CEO employment to the board.	Action needed: Review annual statement of compliance.
	Comments: CEO signed contract of employment states three months notice. All matters concerning CEO employment specifically reserved to the board.		By whom: Company Secretary
G4 The board must delegate to a committee responsibilities that include oversight of the appraisal of the chief executive and making a recommendation to the board on the chief executive's remuneration. The committee must not include any executive members of the board.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Remuneration committee terms of reference include provision for the appraisal of the CEO and reviewing the remuneration of the executive team.	Action needed: Review annual statement of compliance.
	Comments: Remuneration Committee established in 2015 to review appraisal of CE and review the remuneration of the executive team. This committee makes a recommendation to the board on CEO and executive team remuneration. The committee is composed solely of independent non-executive members of the board.		By whom: Company Secretary
G5 The chief executive's remuneration must be disclosed in the annual financial statements in accordance with the applicable Statement of Recommended Practice (SORP).	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: CEO remuneration disclosed in the annual report on accounts.	Action needed: Review annual statement of compliance
	Comments: CEO remuneration disclosed in the annual report on accounts.		By whom: Company Secretary
			By date: June 2016

## H Conduct, probity and openness

### Main requirement

Organisations must maintain, and be seen to maintain, the highest ethical standards of probity and conduct. Boards must operate in an open and transparent manner, having dialogue with and accountability to tenants

Yes  No

Comments:  
Equal representation of

Evidence:  
Significant amount of resident engagement in Accent's corporate governance framework i.e. CSC structure.

Action needed:  
Review annual statement of compliance  
By whom:  
Company Secretary

<p>and other key stakeholders.</p>	<p>residents and independent NEDs recruited against a person specification is in place across all CSCs. The Accent board skills matrix now actively includes specific reference to experience and understanding of being a customer for a social housing provider, preferably Accent, and has resulted in an Accent resident being appointed at a CSC Chair. The five CSC Chairs also sit on the board to ensure a link on strategic issues.</p> <p>The Accent Residents Panel also maintains key engagement with our residents acting as critical friend on key strategic issues e.g. business plan. The ARP meet privately with the Chair and CEO on a quarterly basis.</p> <p>This strengthened approach to resident engagement ensures a continued customer focus across all key governance forums.</p> <p>The Open &amp; Honest section of the website includes key corporate information including accounts, value for money statement.</p> <p>A short summary of the 2014/2020 business plan has been produced and issued to all involved residents, key stakeholders (such as local authorities) and partners.</p>	<p>Formal relationship between the board and the Accent Resident's panel to review the group's strategic direction.</p>	<p>By date: June 2016</p>
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Provisions			
H1 Board membership entails a particular responsibility to avoid any suggestion of impropriety. Matters such as conflicts of interest, or acceptance of gifts or hospitality, are particularly sensitive. Boards must adopt and comply with a code of conduct such as the Federation's <i>Code of Conduct 2012</i> .	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Clear policies on conflicts of interest and gifts and hospitality Non-executive code of conduct is in place.	Action needed: Review annual statement of compliance
	Comments: The Board complies with the NHF Code of Conduct 2012. Clear policies are in place regarding conflicts of interest, acceptance of gifts and hospitality. This is all contained in a non-executive code of conduct.		By whom: Company Secretary
H2 Boards must consider any potential conflicts of interest and adopt appropriate policies and procedures for their declaration and management. All conflicts must be dealt with in a way which upholds the organisation's reputation, and reflects, as applicable:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Robust framework for monitoring conflicts of interest in place. This includes:-  Standing agenda item of declaration of interest at each board and committee meeting  Annual declaration from all board and committee members to ensure any conflicts continually reviewed and mapped on formal conflict register.	Action needed: Review annual statement of compliance
	Comments: Robust framework for monitoring conflicts of interest in place. This includes:-  Standing agenda item of declaration of interest at each board and committee meeting  Annual declaration from all board and committee members to ensure any conflicts continually reviewed and mapped on formal conflict register.		By whom: Company Secretary
(1) the organisation's own constitution;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: All board members provided with a copy of the constitution	Action needed: Review annual statement of compliance

	Comments:	upon appointment. This is reviewed at one to one induction.	By whom: Company Secretary
(2) charity law;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: Board and committee member induction provides an overview on this area of the law. Legal advice is available from the Company Secretary.	By date: June 2016
	Comments: Yes, where applicable.		Action needed: Review annual statement of compliance
			By whom: Company Secretary  By date: June 2016

(3) The Co-operative and Community Benefit Societies Act 2014, concerning transactions and dealings with members and committee members;	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: Board and committee member induction provides an overview on this area of the law. Legal advice is available from the Company Secretary.	Action needed: Review annual statement of compliance
	Comments: Yes, where applicable		By whom: Company Secretary
(4) The Companies Act 2006, concerning how conflicts (of interest, loyalty or duty) are to be declared and managed.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>	Evidence: Board and committee member induction provides an overview on this area of the law. Legal advice is available from the Company Secretary.	Action needed: Review annual statement of compliance
	Comments: Yes, where applicable however used as best practice guidance across the group for all non-executive board and committee members.		By whom: Company Secretary
H3 Where conflicts of personal interest arise these must be recorded and, if material, the individual concerned must be excluded from the discussion or decision by a resolution of the non-conflicted members present.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Conflicts of interest policy	Action needed: Review annual statement of compliance
	Comments: Where a potential or actual conflict of interest is declared this would be formally recorded and the member(s) directed to leave the discussion.		By whom: Company Secretary
H4 In the case of a fundamental or ongoing material conflict the board must consider and determine whether the person concerned should cease to be a board member.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Conflicts of interest policy	Action needed: Review annual statement of compliance
	Comments: If a material conflict of interest		By whom: Company Secretary



	was ongoing the board would consider the appropriateness of the individuals position alongside the length of time it was envisaged the conflict would continue. The board would then determine whether the individual could continue to act.		By date: June 2016
H5 Where there are persons who are members of more than one board in a group, there must be formal arrangements to ensure that if there are any actual or potential conflicts of interest, these are identified and managed.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Conflicts of interest policy in place.	Action needed: Review conflicts of interest policy to ensure in accordance with best practice. Further training to be delivered in October 2015
	Comments: Accent operates a co-terminus board structure. A conflicts of interest policy exists to effectively mitigate all potential or actual conflicts of interest.		By whom: Company Secretary
H6 The board must publish an annual report of the organisation's activities and performance.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Annual value for money assessment and statutory accounts both contain review of Accent activities and performance.	Action needed: Review annual statement of compliance
	Comments: The board publish an annual report of the organisation's activities and performance in the annual financial statements and the annual report on value for money.		By whom: Company Secretary
H7 The organisation must have in place a strategy for regularly communicating information about its work to its shareholders and stakeholders, and ascertaining their views. In doing so, it must have regard to the	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Not applicable Accent operates a closed shareholding policy.	Action needed: Review annual statement of compliance
	Comments: Not applicable Accent operates		By whom: Company Secretary

communication needs of the diverse groups and communities it serves.	a closed shareholding policy.		By date: June 2016
H8 The organisation must respond in a considered and transparent way to requests for information about its work and activities.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Evidence: Open and honest section of the Accent website.	Action needed: Review annual statement of compliance
	Comments: Accent publishes a large amount of information via its open and honest section. Any requests residents or other key stakeholders would be considered and facilitated unless commercially sensitive.		By whom: Company Secretary
			By date: June 2016

This table was prepared by consultancy Campbell Tickell for the National Housing Federation. See [www.campbelltickell.com](http://www.campbelltickell.com) for further information.  
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