

FHC – Self Assessment against the Regulatory Standards

Regulatory Standard 1 (RS)			Self-Assurance level
<i>The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users</i>			<i>Compliant(non-material improvements required)</i>
Ref	SHR Regulatory Requirement	Self-Assurance Factors	Evidence
1.1	The governing body sets the RSL's strategic direction. It agrees and oversees the organisation's business plan to achieve its purpose and intended outcomes for its tenants and other service users	Strengths <ul style="list-style-type: none"> Monthly Management Committee Meetings Business Planning Day TBC Up to Date BPlan Financial Regulation Continuous training and development Management Committee – Has a wide skill set comprising of local people and members who live in the surrounding areas. Commitment of committee members Recruitment of committee members New Committee members Strategic review of business plan has recently took place. Policy Updates – Continuous Use of expert consultants or business plan review Options appraisal Engagement with SHR on senior officer leaving 	<ul style="list-style-type: none"> Health and Safety Policy. Strategic planning process (notes of away days, MC reports etc.) – Analysis into where the organisation were – involved in future business plan Presentation to MC by Arneil Johnston on options going forward Business Plan/Strategy – Arneil Johnston. Arneil Johnson carrying out strategic review of future business Succession Planning – viability of Co-ops, Director recently retired + Committee succession Regular consultation exercises with staff New technology (Zoom / Teams) embraced by committee and staff laptops and tablets purchased to assist. Risk Register – Updated and reported regularly Financial planning process (notes and records) – major finance overhaul & review – Senior Finance Officer Risk assessment and mapping Tenant engagement activities and reporting

1.2	The RSL's governance policies and arrangements set out the respective roles, responsibilities and accountabilities of governing body members and senior officers, and the governing body exercises overall responsibility and control of the strategic leadership of the RSL	Strengths <ul style="list-style-type: none"> • All policies reviewed • Appraisals • Committee meeting & reports • Training on policy review • Code of conduct – signed annually • Register on interests • Strength of working together • Staff Code of Conduct • Feedback from Senior staff 	<ul style="list-style-type: none"> • Committee role descriptions and person specifications (or equivalent e.g. committee profile) • Risk Management Policy / Risk Strategy • Role descriptions for office-bearers • Role/job descriptions for senior officer and senior staff • Scheme of Delegation • Internal Audit reports • Director Appraisal due Mar 25 • Committee appraisal feedback • Good chairing • Professionals on Board
1.3	The governing body ensures the RSL complies with its constitution and its legal obligations. Its constitution adheres to these Standards and the constitutional requirements set out below	<ul style="list-style-type: none"> • Rules /Legal and contractual obligations. • Committee & Staff Training • Performance Reporting • Committee & Staff Code of Conduct & Training • Good legal independent legal representation • Option of one to one committee training for missed training sessions. • Clear reports to Board with relevant text. • Updated Policy Register. • Joined up with other Co-op Directors Forum / Network 	<ul style="list-style-type: none"> • Rules approved by FCA Nov 2020 • Legal advice • Internal and External Audit • Standing Orders • Scheme of Delegation • Training records • Report templates • Health and safety audits • Ref GS4.1, and 5.3, 2.2, 2.5, 1.7, 3.7, 2.1, 6.4 • ARC • Annual report • Minutes • Membership Register • Committee members undergo committee training • Induction • Packs sent to new members - rules etc

1.4	All governing body members accept collective responsibility for their decisions	<ul style="list-style-type: none"> • Committee Code of Conduct • Fully Involved in Decision Making • Sub-Committees when necessary • Holding senior staff to account • Challenging at Management Committee Meetings • Training well attended 	<ul style="list-style-type: none"> • MC minutes • MC training records
1.5	All governing body members and senior officers understand their respective roles, and working relationships are constructive, professional and effective	<ul style="list-style-type: none"> • Clear Roles & Responsibilities • Committee & Staff Work Well • Committee hold staff to account. • Evaluation and feedback from staff and committee training. • Good Committee Reports • Committee ask Challenging Questions • On-going Governance Training • Staff challenge and ask interesting questions • Staff training scheduled throughout the year 	<ul style="list-style-type: none"> • MCM role descriptions • MC recruitment, selection and induction processes and records • MCM annual review process • Senior officer appraisal process • Succession Planning • Management Committee Members with more professional backgrounds ie Accountant
1.6	Each governing body member always acts in the best interests of the RSL and its tenants and service users, and does not place any personal or other interest ahead of their primary duty to the RSL	<ul style="list-style-type: none"> • Committee Code of Conduct • Rules • Register of interests • Robust Code of Conduct. 	<ul style="list-style-type: none"> • Code of Conduct • MC recruitment and selection process • MC training programme – Induction ASAP • Register of Interests • Policy on declaring and managing interests • Report template • Committee adherence to code of conduct • Chair setting examples and outlining rules at start of meetings
1.7	The RSL maintains its independence by conducting its affairs without control, undue	<ul style="list-style-type: none"> • Induction and regular training in place. • Option Appraisal Oct 23 • Business Plan review Nov 23 	<ul style="list-style-type: none"> • Code of Conduct • Recruitment policy • Induction policy

	reference to or influence by any other body (unless it is constituted as the subsidiary of another body)	<ul style="list-style-type: none"> • MC annual review • Loan Portfolio, FYFP, ARC on SHR Portal • Ref GS 1.3
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Ref	SHR Regulatory Requirement	Self-Assurance Factors	Evidence
2.1	The RSL gives tenants, service users and other stakeholders information that meets their needs about the RSL, its services, its performance and its future plans	<ul style="list-style-type: none"> • TP Strategy • Tenants represented on committee • Performance monitoring • Customer Care policy • Newsletters every quarter • Annual report • Ad hoc newsletters and flyers • Tenant representation on other groups • Social media • New start up pack for new tenancy and to community facilities 	<ul style="list-style-type: none"> • MC minutes • MC training records • MC reports • Engagement plan available on Website • Ref GS 2.2 • ARC • Ref 2.4, 1.3, 2.1, 6.4 • Newsletters and text messaging systems implemented
2.2	The governing body recognises it is accountable to its tenants, and has a wider public accountability to the taxpayer as a recipient of public funds, and actively manages its accountabilities	<ul style="list-style-type: none"> • Code of Conduct • Complaints, Whistleblowing Standing Orders Policy • Register of Interest update annually • Business Plan • AGM • Annual Report • Performance Reporting • Business continuity/emergency planning • Encourage observers to meetings 	<ul style="list-style-type: none"> • External Audit annually • Complaints reporting Rules • Assurance statement • Ref RS 2.5, 1.3 • SPSO Guidance • New rules implemented

		<ul style="list-style-type: none"> • Encourage volunteering 	
2.3	The Governing Board is open and transparent about what it does, publishes information about its activities and, wherever possible, agrees to requests for information about the work of the governing body and the RSL	<ul style="list-style-type: none"> • Tenant satisfaction survey • Complaints Policy • TP Strategy • Customer Service • Risk Management • Other resident groups • Membership Policy • Freedom of Information (FOI) and Environmental Information Regulations (EIR) requests responded to and reported to the Information Commissioner for Scotland. 	<ul style="list-style-type: none"> • Compliance with FOI legislation and FOI requests • Annual performance report to tenants
2.4	The RSL seeks out the needs, priorities, views and aspirations of tenants, service users and stakeholders. The governing body takes account of this information in its strategies, plans and decisions	<ul style="list-style-type: none"> • Compliance With SHR Regulation Plan • Regulation with Lenders OSCR, SHR, H&S Act, Equality etc • SHR Regulatory Standards • Register of interests updated annually and as required • Programme in place to ensure deadlines are met for all regulators/funders 	<ul style="list-style-type: none"> • Rules/Legal and contractual obligations • Legal advice • Internal and External Audit • Standing Orders • Scheme of Delegation • Training records • Report template • Ref GS2.1 • Ref GS 1.3 • Annual report • SPSO guidance followed and policy adhered to • Rent Consultation • Rent Focus Group • Estate walkabouts

2.5	The RSL is open, co-operative, and engages effectively with all its regulators and funders, notifying them of anything that may affect its ability to fulfil its obligations. It informs the Scottish Housing Regulator about any significant events such as a major issue, event or change as set out and required in our notifiable events guidance	Notify SHR of any changes	<ul style="list-style-type: none"> • MC agendas, minutes and reports • Scheme of Delegation • MCM and senior staff training records • Schedule(s)/Register of Returns/Notifications made • Internal Audit reports/programme • Assurance statement • Notifiable Event policy • Health and Safety Audit • Ref 1.3
Regulatory Standard 3 (RS) <i>The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay</i>			Self-Assurance level <i>Compliant(non-material improvements required)</i>

Ref	SHR Regulatory Requirement	Self-Assurance Factors	Evidence
3.1	The RSL has effective financial and treasury management controls and procedures, to achieve the right balance between costs and outcomes. The RSL ensures security of assets, the proper use of public and private funds, and access to sufficient liquidity at all times	<ul style="list-style-type: none"> • Financial Regulations & Policies • Auditors Internal & External • Value for Money • Management & Annual Accounts • Strong relationship with lenders • Financial training for committee and staff • Budget Holder Meetings • Monthly Reconciliations • Delegated Authority 	<ul style="list-style-type: none"> • Financial plans and projections • Treasury management policy • MC reports • Feedback from tenant consultations • Tenant newsletters and publications • Annual Reports

			<ul style="list-style-type: none"> • Statements on value for money and affordability • Internal Audit reports and action plans • External Audit Annual Report • External Audit management letter
3.2	The governing body fully understands the implications of the treasury management strategy it adopts, ensures this is in the best interests of the RSL and that it understands the associated risks	<ul style="list-style-type: none"> • Treasury Management Policy • Financial Policy • Investment Plans • Sub-Committees convened when required • Financial training continuous 	<ul style="list-style-type: none"> • Treasury management policy • Risk Strategy • Records of / reports about external / specialist advice • MC training records • MC reports • Scheme of Delegation
3.3	The RSL has a robust business planning and control framework and effective systems to monitor and accurately report delivery of its plans. Risks to the delivery of financial plans are identified and managed effectively. The RSL considers sufficiently the financial implications of risks to the delivery of plans	<ul style="list-style-type: none"> • Business Plan Process – Approved by SHR • Stock condition survey results included in 30-year projections in B Plan. • Benchmarking • Review against Charter Indicators • Training • Recent Option Appraisals undertaken and completed 	<ul style="list-style-type: none"> • Records of planning events and/or away days • Risk Strategy and Risk Register • Benchmarking (or equivalent) reports • Key Performance Indicators (KPIs) • Governing body reports • Performance reports • Risk reports • Internal Audit reports • Notifiable Events

3.4	The governing body ensures financial forecasts are based on appropriate and reasonable assumptions and information, including information about what tenants can afford to pay and feedback from consultation with tenants on rent increases	<ul style="list-style-type: none"> • Financial Projections – 5 & 30 years • BP Review Bi-Annually • SFHA Affordability Tool Utilised for rent increase exercise • Refinancing options to management committee • Rent focus group • Pier review of RSL's 	<ul style="list-style-type: none"> • Governing body reports • File notes • MC reports • Tenant consultation group on rent increase taking place. • Improved rent consultation document – easy to understand
3.5	The RSL monitors, reports on and complies with any covenants it has agreed with funders. The governing body assesses the risks of these not being complied with and takes appropriate action to mitigate and manage them	<ul style="list-style-type: none"> • Treasury Management Policy • Quarterly Covenant Reporting sent to Lender • Robust Forecasting • Management and Annual Accounts • Loan Portfolio Info • Committee Regular Reports • Senior Finance Officer post 	<ul style="list-style-type: none"> • Finance Function Reviewed • Risk assessments • MC training records • Notifiable events • Register of Returns • More Financial Internal Autonomy • Action Plan • Internal audit on finance function was completed in the year. • Programme of submission dates adhered to • Financial training completed for committee and staff with an external consultant.

3.6	The governing body ensures that employee salaries, benefits and its pension offerings are at a level that is sufficient to ensure the appropriate quality of staff to run the organisation successfully but which is affordable and not more than is necessary for this purpose	<ul style="list-style-type: none"> • EVH Salary Guidance • The Pension Trust (TPT) 	<ul style="list-style-type: none"> • Terms and Conditions Sector comparisons / benchmarking • Specialist advice • Code of Conduct • Policy on declaring interests and managing conflicts of interest • Declarations of interest
3.7	The GB ensures the RSL provides accurate and timely statutory and regulatory financial returns to the Scottish Housing Regulator. The GB assures itself that it has evidence the data is accurate before signing it off	<ul style="list-style-type: none"> • ARC • Financial Accounts • External Audit –page out of accounts 	<ul style="list-style-type: none"> • Submissions calendar • MC reports • Internal Audit • Loan Portfolio, FYFP, ARC, SHR Portal • Ref RS 1.3

Regulatory Standard 4 (RS)	Self-Assurance level
<i>The RSL manages its resources to ensure its financial well-being, while maintaining rents at a level that tenants can afford to pay</i>	<i>Compliant(non-material improvements required)</i>

Ref	SHR Regulatory Requirement	Self-Assurance Factors	Evidence
4.1	The governing body ensures it receives good quality information and advice from staff and, where necessary, expert independent advisers, that is timely and appropriate to its strategic role and	<ul style="list-style-type: none"> • Good Quality Reports & Minutes • Social Housing Charter • Approve Budgets & Accounts • Monitor Finances 	<ul style="list-style-type: none"> • papers / reports • Remits for MC and sub-committees Governing body minutes

	decisions. The governing body is able to evidence any of its decisions	<ul style="list-style-type: none"> • Pension Updates • SFHA and EVH updates • SHR updates • Internal and External Audits 	<ul style="list-style-type: none"> • Governing body Scheme of Delegation • Notes/records of away days • Training records • Examples of external advice/ consideration of the need for it/records of • Arneil Johnston independent advisors addressed management committee • The committee decide the Co-op's future direction.
4.2	The governing body challenges and holds senior officers to account for their performance in achieving the RSL's purpose and objective	<ul style="list-style-type: none"> • Committee Minutes • Performance • Good Relationship • Challenge is embraced • Reports to committee prior to meetings at meetings • Challenge and questions are promoted 	<ul style="list-style-type: none"> • Papers / reports • Remits for MC and sub-committees • Governing body and sub-committee minutes • Governing body Scheme of Delegation • Notes/records of away days • Training records • Examples of external advice/ consideration of the need for it/records of how advice was used • Governing body reports and minutes • Corporate Plan • Performance reports • Use of benchmarking

			<ul style="list-style-type: none"> • Appraisal records for senior officer • Scheme of Delegation • Internal Audit
4.3	The governing body identifies risks that might prevent it from achieving the RSL's purpose and has effective strategies and systems for risk management and mitigation, internal control and audit	<ul style="list-style-type: none"> • Robust Risk Management • External & Internal Audits • Business continuity planning • Financial controls • Landlord Health and Safety 	<ul style="list-style-type: none"> • Risk strategy and policy • Risk map (may be integral to the strategy / policy) • Internal Audit programme • Business continuity/ Disaster recovery strategy • Governing body reports and minutes • Reports from 'tests' (of processes such as business continuity; emergency planning etc) • Internal audit/ assurance reports • Action plans / implementation reports • Notifiable Events policy
4.4	Where the RSL is the parent within a group structure it fulfils its responsibilities as required in our group structures guidance to: control the activities of, and manage risks arising from, its subsidiaries; ensure appropriate use of funds within the group; manage and mitigate risk to the core business; and uphold strong standards of		

	governance and protect the reputation of the group for investment and other purposes		
4.5	The RSL has an internal audit function. The governing body ensures the effective oversight of the internal audit programme by an audit committee or otherwise. It has arrangements in place to monitor and review the quality and effectiveness of internal audit actively, to ensure that it meets its assurance needs in relation to regulatory requirements and the Standards of Governance and Financial Management. Where the RSL does not have an audit committee, it has alternative arrangements in place to ensure that the functions normally provided by a committee are discharged	<ul style="list-style-type: none"> • Audit programme • Remit for Management Committee 	<ul style="list-style-type: none"> • External auditor appointed Jan 2020, currently working the contract, currently runs until 2025. • Internal auditor currently working through the contract. • Audit recommendations implemented
4.6	The governing body has formal and transparent arrangements for maintaining an appropriate relationship with the RSL's external auditor and its internal auditor	<ul style="list-style-type: none"> • Annual Accounts presentation • Management letter • Coop reply letter • Representation letter. 	<ul style="list-style-type: none"> • Procurement policy • Tendering/ procurement records • External Audit plan Auditor's management letter • Internal Audit programme • Remit of Management Committee • Records of meetings between MC and auditors • Scheme of Delegation

Regulatory Standard 5 (RS)	Self-Assurance level
<i>The RSL conducts its affairs with honesty and integrity</i>	<i>Compliant(non-material improvements required)</i>

Ref	SHR Regulatory Requirement	Self-Assurance Factors	Evidence
5.1	The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds the good reputation of the RSL and the sector	<ul style="list-style-type: none"> • Vision, Values • On-going Training • Relevant Policies in Place • Codes of Conduct • Register of interest • Policy on payments, benefits and entitlements • Information from SHR , SFHA and relevant housing bodies 	<ul style="list-style-type: none"> • Continuous • Register of Interest
5.2	The RSL upholds and promotes the standards of behaviour and conduct it expects of governing body members and staff through an appropriate code of conduct. It manages governing body members' performance, ensures compliance and has a robust system to deal with any breach of the code	<ul style="list-style-type: none"> • Codes of Conduct • All Meeting Questioned Minutes Accessible • Register & Declaration of Interest • Business Plan • Appraisal system • Directors appraisal policy 	<ul style="list-style-type: none"> • Codes of Conduct • Protocol/process for dealing with alleged breaches • Statement of Values • MCM/staff appraisal process • Annual signing of Codes of Conduct • Training records for MCMs and staff • Annual reviews of MCM contributions • Reports to MC on the outcomes of annual reviews; implementation of action points • Process for dealing with alleged breaches of the Code of Conduct

			<ul style="list-style-type: none"> • Scheme of Delegation (responsibility for overseeing investigation) • Whistleblowing policy • Ref RS 5.6
5.3	The RSL pays due regard to the need to eliminate discrimination, advance equality and human rights and foster good relations across the range of protected characteristics in all areas of its work, including its governance arrangements	<ul style="list-style-type: none"> • Equality & Diversity Policy • Dignity at Work • Equality and Diversity included in all reports to committee 	<ul style="list-style-type: none"> • Equalities and Diversity Policy and procedures • External accreditations • Reasonable adjustments carried out • Succession plans • Ref GS 1.3,
5.4	Governing body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position	<p>Relevant Policies in Plan:-</p> <ul style="list-style-type: none"> - Declaration of Interest - Payments & Benefits - Gifts & Hospitality 	<ul style="list-style-type: none"> • Entitlements, Payments and Benefits Policy • Policy on declaring interests and managing conflicts • Registers of Interest • Training records • Agendas and minutes • File notes • Appraisal framework for the senior officer • Records of external advice obtained • Annual MC Report following the senior officer's appraisal • Access to external organisations offering advice

			and support (counselling services, Public Concern at Work)
5.5	The governing body is responsible for the management, support, remuneration and appraisal of the RSL's senior officer and obtains independent, professional advice on matters where it would be inappropriate for the senior officer to provide advice	<ul style="list-style-type: none"> • EVH Salary • Good links to consultancy • Procurement of independent advice robust 	<ul style="list-style-type: none"> • Updated relevant finance policies
5.6	There are clear procedures for employees and governing body members to raise concerns or whistleblow if they believe there has been fraud, corruption or other wrongdoing within the RSL	<ul style="list-style-type: none"> • Fraud, Whistleblowing & Bribery Policy and registers in place. • Reported annually to Committee Entitlements and Benefits Policy in place • Declaration of Interest on Agendas 	<ul style="list-style-type: none"> • Prevention of Fraud and Anti-Bribery Policy • Internal Audit reports on controls • Whistle Blowing policy • Ref GS 5.2
5.7	Severance payments are only made in accordance with a clear policy which is approved by the governing body, is consistently applied and is in accordance with contractual obligations. Such payments are monitored by the GB to ensure the payment represents value for money. The RSL has considered alternatives to severance including redeployment	<ul style="list-style-type: none"> • Payments are approved by MC. • EVH Conditions of service and legal advice as required. • SHR Notifiable Events Guidance 	<ul style="list-style-type: none"> • Policy adopted on severance payments
5.8	Where a severance payment is accompanied by a settlement agreement the RSL does not use this to limit public accountability or whistleblowing. The RSL has taken professional legal advice	Legal advice always sought.	

	before entering into a settlement agreement	
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Regulatory Standard 6 (RS)	Self-Assurance level
<i>The governing body and senior officers have the skills and knowledge they need to be effective</i>	<i>Compliant(non-material improvements required)</i>

Ref	SHR Regulatory Requirement	Self-Assurance Factors	Evidence
6.1	The RSL has a formal, rigorous and transparent process for the election, appointment and recruitment of GB members. The RSL formally and actively plans to ensure orderly succession to GB places to maintain an appropriate and effective composition of GB members and to ensure sustainability of the GB	<ul style="list-style-type: none"> • Committee Recruitment • AGM Election To Committee • Committee Appraisal • Training Programme • Rules • Governing body annual reviews Induction process is implemented effectively • The induction process is supplemented by external training 	<ul style="list-style-type: none"> • MC profile • Recruitment policy • Appraisal records • Minutes AGM and MC • Appointed members • Reports contain professional advice where required.
6.2	The GB annually assesses the skills, knowledge, diversity and objectivity it needs to provide capable leadership, control and constructive challenge to achieve the RSL's purpose, deliver good tenant outcomes, and manages its affairs. It assesses the contribution of continuing governing body members and what gaps there are that need to be filled	<ul style="list-style-type: none"> • AGM • Chair Appraisal • Appraisal • 9 Year Rule – assessment 	<ul style="list-style-type: none"> • Skills Audit carried out annually • Business Plan • Rules
6.3	The RSL ensures that all GB members are subject to annual performance reviews to assess their contributions and	<ul style="list-style-type: none"> • Committee • Training Plan 	<ul style="list-style-type: none"> • Skills audit carried out annually

	effectiveness. The GB takes account of these annual performance reviews and its skills needs in its succession planning and learning and development plans. The GB ensures that any non-executive member seeking re-election after 9 years' continuous service demonstrates continued effectiveness	<ul style="list-style-type: none"> • Committee Appraisal • Attend Conferences • Networking 	
6.4	The RSL encouraged as diverse a membership as is compatible with its constitution and actively engages its membership in the process for filling vacancies on the GB	<ul style="list-style-type: none"> • Membership drive and committee drive • Good candidates for management committee identified 	<ul style="list-style-type: none"> • AGM papers, • Newsletters, • Notices • Membership register • Minutes • Ref GS 1.3,2.1 • New rules used • Good promotion of membership
6.5	The RSL ensures all new governing body members receive an effective induction programme to enable them to fully understand and exercise their governance responsibilities. Existing governing body members are given ongoing support and training to gain, or refresh skills and expertise and sustain their continued effectiveness	<ul style="list-style-type: none"> • MC Skills audit 	<ul style="list-style-type: none"> • Induction Policy, • Training policy, • Feedback reports. • Internal • External • Training regularly promoted • Promote refreshing of skills • Correspondence • Strong communication methods
6.6	If the governing body decides to pay any of its non-executive members then it has a policy framework to demonstrate	N/A	

	clearly how paying its members will enhance decision-making, strengthen accountability and ownership of decisions, and improve overall the quality of good governance and financial management and deliver VFM		
6.7	The governing body is satisfied that the senior officer has the necessary skills and knowledge to do his/her job. The GB sets the senior officer's objectives, oversees performance, ensures annual performance appraisal and requires continuous professional development	<ul style="list-style-type: none"> • refer to RS5.2 	Director recruitment exercise in Feb 2024