

Northern Ireland Housing Executive Corporate Governance Manual



Date of this version	March 2017
Author(s)	Finance Division
Approved by	Board March 2017
Date of Next Review	March 2019

Purpose of this Document:

This Corporate Governance Manual aims to support and help the Housing Executive ensure the highest standards of Corporate Governance throughout the organisation and to promote adherence to accepted good governance principles.

The manual provides an overview of the structures, documents and controls in place to ensure the Housing Executive's resources are used appropriately and efficiently and that the organization operates in accordance with best practice. It also sets the relationship between the Housing Executive and its sponsor department, the Department for Communities and, what is expected of the Board, Chief Executive, Directors and staff in terms of good governance behaviours.

The manual acts as a single point of reference for key the Housing Executive policy, structure and principles. It does not include all policies, as these are area specific, nor does it introduce additional bureaucracy. Instead it aims to provide the overarching governance documents used by the Housing Executive.

Approved by		Date
Corporate Governance Manual	Board	May 2012
Corporate Governance Manual - Update	Board	April 2014
Corporate Governance Manual - Update	Board	March 2017

CONTENTS

PART ONE:.....	5
Foreword - The Corporate Governance Manual.....	5
Management Summary - The Northern Ireland Housing Executive.....	6
PART TWO:.....	7
Governing Legislation	7
Equality Scheme.....	8
Financial Regulations	8
Corporate Procurement Strategy	9
Health & Safety Policy Statement and Strategy	9
Procedures for Handling Personal Information under the Data Protection Act 1998.....	10
Freedom of Information Act 2000 Policy & Procedures	11
DFC Management Statement and Financial Memorandum/ Dossier of Controls.....	11
PART THREE:.....	13
Governance Structure.....	13
Introduction: Board Operating Framework/Committee Terms of Reference.....	13
The Board Operating Framework	14
Code of Practice - Board Members.....	14
Standing Orders and Board Scheme of Delegations.....	15
The Audit and Risk Assurance Committee Terms of Reference	15
DLO Performance & Development Committee Terms of Reference.....	16
The Chief Executive’s Business Committee Terms of Reference.....	16
Corporate Performance Review Committee Terms of Reference	16
The Landlord Services Clearing House Committee Terms of Reference	17
The Regional Services Clearing House Committee Terms of Reference.....	17
PART FOUR:.....	18
Staff Code of Conduct (The Staff Code) 2015	18
Whistleblowing Procedures	18

PART FIVE:	19
Risk Management Framework.....	19
Risk Assurance Framework	20
Corporate Plan	21
Fraud & Irregularity Procedures	21
Complaints Procedure.....	22
Environmental Policy	22
Rural Proofing	23

PART ONE:

Foreword - The Corporate Governance Manual

Good Corporate Governance is crucial to any well managed organisation. Corporate Governance is not simply about having the right documents or financial controls in place nor is it solely about the management of risk and performance. It is also about the organisation's culture and values, Board leadership, staff behaviours, attitudes and accountability and about having clearly defined roles and responsibilities.

Managing all these elements in a large organisation can be difficult and the Housing Executive, having gone through a governance review in 2010, has sought to ensure that good governance practice is adopted throughout the organisation from Board level through to operational frontline staff.

Regular reviews of key governance documents are regularly undertaken and training for staff on good governance principles is available and aims to raise awareness of good governance practice, based on the Nolan principles.

This Corporate Governance Manual aims to support and help the Housing Executive ensure the highest standards of corporate governance throughout the organisation and to promote adherence to accepted good governance principles. It provides an overview of the structures, documents and controls in place to ensure the Housing Executive's resources are used appropriately and efficiently and that the organisation operates in accordance with best practice. It also sets the relationship between the Housing Executive and its sponsor department, the Department for Communities and, what is expected of the Board, Chief Executive, Directors and staff in terms of good governance behaviours.

Supporting the governance structures are a number of key organisational strategies, policies and guidance notes which will also be subject to regular review to ensure they remain relevant and fit for purpose. These documents have been included in the manual.

This manual will be a living document and, together with its individual components, and will be subject to regular review and adjustment as necessary to ensure it remains a relevant guide to corporate governance in the Northern Ireland Housing Executive.

Management Summary - The Northern Ireland Housing Executive

The Northern Ireland Housing Executive is the single strategic housing authority in Northern Ireland managing a stock of approximately 90,000 homes and employing around 3,000 people.

The organisation is a non-departmental public body (NDPB), governed by a ten member Board and operating through the provision of public funds from the Department for Communities and rental income. The Minister responsible for the Department for Communities is accountable to the Northern Ireland Assembly for the policies and performance of the Housing Executive including its use of resources and the policy framework within which it operates. In practice we operate within a NDPB framework as an arm's length body sponsored by the DFC, although for accounting purposes we are two separate entities.

The Housing Executive's role is to assess housing need in Northern Ireland and progressively to meet that need directly, or by facilitating or enabling other agencies to do so. The Housing Executive promotes high standards of new house building, repair, maintenance, housing management and general housing advice.

The Housing Executive is also the Home Energy Efficiency Authority for Northern Ireland. Financial pressures and issues such as equality, human rights, targeting social need, best value and tenant participation are particular influences on the Housing Executive's work, as is the search for innovative ways of providing and managing social housing and the drive for better performance year on year.

Public bodies like the Housing Executive operate through a governance framework which brings together legislative requirements, governance principles and management processes. Good governance leads to good management, good performance, good stewardship of public money, good public engagement and, ultimately, good outcomes from the services provided and for those it serves.

The Housing Executive operates within a Corporate Governance Framework which ensures accountability to its users, stakeholders and the wider community to which it relates.

PART TWO:

Governing Legislation

Paramount in the governance of the Northern Ireland Housing Executive is the need to ensure its acts within the law. The Housing Executive is a creature of statute. It was originally established as a public authority and independent body corporate under the Housing Executive Act (Northern Ireland) 1971, which was subsequently repealed. This status continues under the Housing (Northern Ireland) Order 1981. The Housing Executive, as a public authority is also subject to Section 75 of the Northern Ireland Act 1998 which obliges it to carry out its functions having due regard to the need to promote equality of opportunity between certain specified groups of people.

As a statutory body the Housing Executive's functions (which are made up of duties and powers) are laid down by statute. They are to be found chiefly in the various Housing (Northern Ireland) Orders from 1981-2011.

The following legislation also sets out additional Housing Executive functions:

- **Home Energy Conservation Act 1995**
- **Social Security Administration (NI) Act 1992**
- **Housing Support Services Order (NI) 2002**
- **Housing Support Services Regulations (NI) 2003**
- **Housing (Amendment) (Northern Ireland) Order 2006**
- **Housing (Amendment) Act (NI) 2010**
- **Housing (Amendment) Act (NI) 2011**

The Housing Executive, as a public authority, is also subject to Section 75 of the Northern Ireland Act 1998 which obliges it to carry out its functions having due regard to the need to promote equality of opportunity between certain specified groups of people.

These include – but are not limited to - the following:

- The regular examination of housing conditions and housing requirements
- Drawing up wide ranging programmes to meet housing needs
- Establishing housing information and advisory services
- Consulting with District Councils and the Northern Ireland Housing Council
- Effecting the closure, demolition and clearance of unfit houses
- The possession of unoccupied houses
- Carrying out improvements or repairs by agreement
- Entry to land for the purpose of survey, valuation or examination
- Making vesting orders in respect of land and the disposal of land held
- Administering Housing Benefit to the public and private rented sectors
- Undertaking the role of the Home Energy Conservation Authority for Northern Ireland
- Administering the 'Supporting People' initiative
- Administering Private Sector Grants
- Provision of caravan sites for members of the Traveller Community
- The making of energy Brokering arrangements for its tenants pursuant to an approved statutory scheme

- Preparation and submission of a Houses in Multiple Occupation (HMO) Registration Scheme for Departmental approval and HMO regulation
- Information sharing powers in respect of anti-social behaviour
- Powers to take action to enhance community safety in any area
- Power to enter into arrangements with other statutory authorities
- Effecting the improvement of the condition of the housing stock
- Identifying the need for the provision of new social houses
- The formulation and publication of a Homelessness Strategy
- Provision of advice about homelessness and the prevention of homelessness Statutory responsibility for dealing with homeless applications
- Publication and review of its anti-social behaviour policies and procedures

Equality Scheme

Public authorities in carrying out their functions relating to Northern Ireland are required by the Section 75 statutory duties to have due regard to the need to promote equality of opportunity:

- Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
- Between men and women generally
- Between persons with a disability and persons without
- Between persons with dependants and persons without
- And have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group

Under Schedule 9 of the Northern Ireland Act 1998, designated public authorities, which include the Housing Executive, are required to submit an equality scheme to the Equality Commission. An equality scheme is a statement of the public authority's commitment to fulfilling its Section 75 statutory duties, including procedures for measuring performance.

http://www.nihe.gov.uk/equality_scheme.pdf

Financial Regulations

To conduct its business efficiently, a public body needs to ensure that it has sound financial management policies in place and that they are adhered to.

The Housing Executive's Financial Regulations provide the framework within which the financial administration is to be conducted and ensure that sound financial control is operated. The provisions in Standing Orders and the Board Scheme of Delegations should be applied in accordance with the Housing Executive's Financial Regulations.

Corporate Procurement Strategy

The Northern Ireland Housing Executive procures a wide range of Supplies, Works and Services as the Strategic Housing Authority in Northern Ireland. The value of these requirements is in the region of £300m annually and covers everything from Response Maintenance to Planned Maintenance to Stationery to Professional Services to name but a few. The Housing Executive maintains a professional procurement function – The Corporate Procurement Unit (CPU) – which ensures that all procurement is compliant with European and National regulations as well as Northern Ireland Public Procurement Policy.

This compliance is assured by the Housing Executive's Corporate Procurement Strategy (CPS) updated and approved by the Board in January 2015. This document outlines the organisation's vision and methodology for delivering robust procurement. The strategy now governs procurement within the Housing Executive and provides a clear framework and the overarching template for the delivery of all the Housing Executive's procurement requirements. Furthermore the Strategy details the governance and hierarchical structure for the delivery of such procurements.

The CPS is now the catalyst for all procurement strategies within the Housing Executive. This will ensure that all future strategies are taken forward in accordance with the tenets of best practice procurement methodologies.

The procurement arrangements will differ, depending upon the estimated value or amount of the particular procurement, and subject always to the requirements of EU public procurement law.

http://www.nihe.gov.uk/corporate_procurement_strategy

Health & Safety Policy Statement and Strategy

In accordance with the requirements of the Health and Safety at Work (N.I.) Order 1978 and associated legislation, the Housing Executive recognises and accepts its responsibility as an employer for providing a safe and healthy workplace and as far as is reasonably practicable, a risk free working environment for all its employees. It will conduct its activities so as to minimise and where possible, eliminate the risk to which others e.g. Visitors, Members of the Public, Contractors etc. may be exposed as far as is reasonably practicable.

Employees are reminded of their own duties under Article 8 and 9 of the Order which requires that they take care of their own safety and that of others who may be affected by their acts or omissions.

These objectives will be achieved by:

- Providing clear definition of the roles and ownership of health and safety responsibility for all management staff
- Developing and periodically reviewing a comprehensive Health and Safety Manual that is available to all staff
- Providing a comprehensive Health and Safety training programme
- General Awareness training for all staff
- Undertaking on-going Health and Safety audits

- Implementing an Accident Prevention Programme
- Providing help, information and advice to all staff via the Health and Safety Advisor, the Portal and periodic Health and Safety bulletins

http://www.nihe.gov.uk/index/about/corporate_governance/key_governance_documents/health_safety.htm

Procedures for Handling Personal Information under the Data Protection Act 1998

The Housing Executive's guidance on Data Protection concerns the collection and handling of personal information and applies to all personal information created or collected by the Housing Executive and its staff in the course of their daily work. The procedures for the collection and handling of personal information apply to all personal information created or collected by the Housing Executive and its staff in the course of their daily work.

The information includes:

- The names and other details of tenants, grant applicants, housing benefit claimants, employees, and other individuals with whom we do business;
- The names and other details of those who correspond with us or provide details during telephone calls;
- Information about contractors and suppliers of goods and services;
- Information held by managers about their staff, such as performance management information;
- Word processed documents, spreadsheets and databases which contain personal details such as names and addresses
- Emails, where either the person sending or receiving is identifiable or the contents refer to identifiable people

Collectively this personal information is called 'personal data' and the people it is about are called 'data subjects'. The information is generally held in systems such as HMS, I-world (HB), Payroll and PSMS (Grants), Outlook mailboxes, and a range of other local specific databases 'owned' by other Departments.

http://www.nihe.gov.uk/index/about/corporate_governance/key_governance_documents/handling_personal_information.htm

Freedom of Information Act 2000 Policy & Procedures

The Housing Executive's FOI procedures manual provides detailed guidance to staff responsible for dealing with Requests for Information under the Freedom of Information Act 2000.

The aim of the manual is to ensure that staff are able to deal effectively with requests and to encourage consistency and best practice in the operation of the Freedom of Information Act (FOIA) and the Environmental Information Regulations (EIRs).

http://www.nihe.gov.uk/freedom_of_information_act_2000_policy_procedures.pdf

DFC Management Statement and Financial Memorandum/ Dossier of Controls

These documents set out the controls to be exercised over the different areas of the NIHE's activities by the Department for Communities (DFC) directly or by the NIHE itself. The prime purpose of the documents is to assist the Permanent Secretary of DFC in discharging his responsibilities in relation to the NIHE's systems and as such it represents a formal statement by DFC of the standards it requires the NIHE to achieve in relation to the probity of activities.

The documents accordingly seek to set down the broad policies and related procedures of the NIHE, which are agreed by DFC and for which the Permanent Secretary, as Accounting Officer, is responsible and would answer accordingly to the Public Accounts Committee. Actions and decisions taken within policies and procedures set out in the documents are the responsibility of the NIHE's Board.

DFC's approval of the NIHE's budgets and the payment by DFC of Housing Grant to the NIHE is conditional upon the NIHE's compliance with the terms of the documents.

In addition, DFC may also under Article 10(1) of the 1981 Order, give directions of a general or specific nature to the NIHE regarding the discharge of its functions. The 1981 Order requires the NIHE to act in accordance with such directions.

Certain controls set out in the documents lend themselves particularly to audit review to establish whether they are being followed and whether the procedures described are adequate. This is the responsibility of the Northern Ireland Audit Office (NIAO), DFC Housing Division / Internal Audit and NIHE Internal Audit.

The format of the documents is as follows:

- Part 1 is the Management Statement, which sets down the general framework governing the Housing Executive's operations and its relationship with DSD.
- Part 2 is the Financial Memorandum which sets out the financial controls governing the Housing Executive's operations.
- Part 3 consists of individual control documents either specifying procedures for obtaining DFC/DFP approval, or prescribing varying levels of delegated authority within policies and

guidelines laid down or agreed by DFC/DFP covering income and expenditure in each line or combination of lines in the NIHE's budgets.

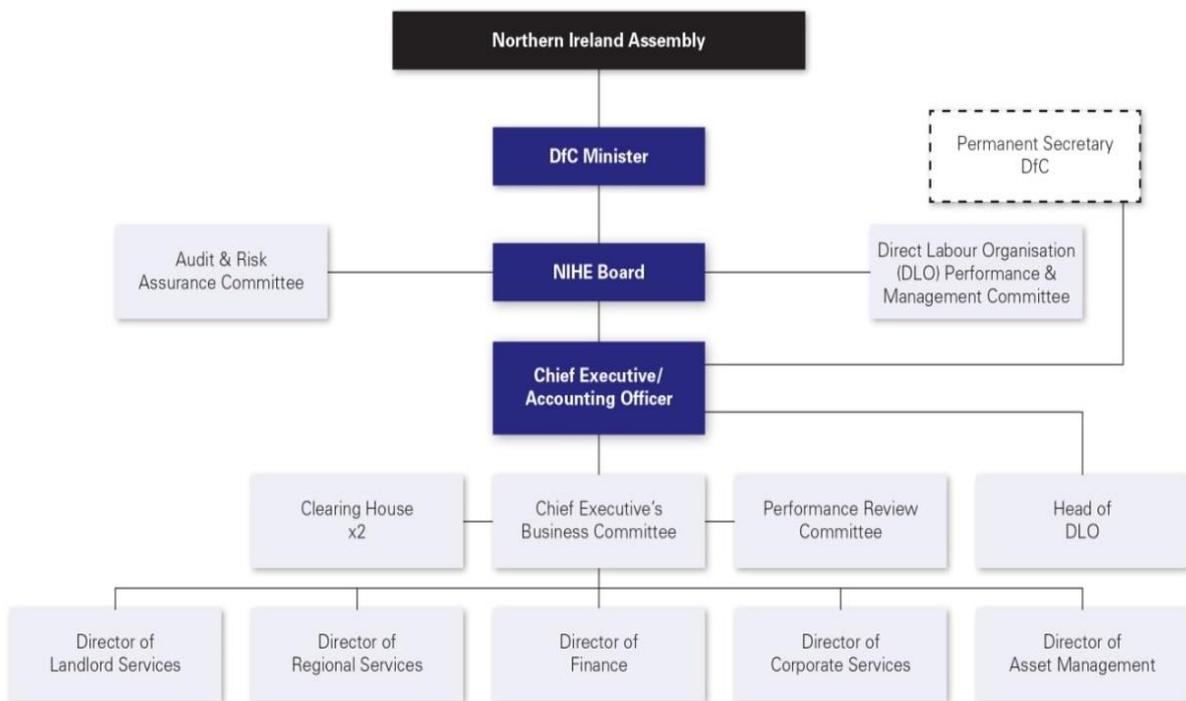
A senior officer in both DFC and the NIHE has been delegated responsibility for maintaining these documents. In DFC this responsibility rests with the Head of Housing Corporate Services Branch and in NIHE with the Director of Corporate Services.

<https://www.communities-ni.gov.uk/sites/default/files/publications/dsd/management-statement-financial-memorandum-pt1-pt2.pdf>

PART THREE:

Governance Structure

The governance structure diagram below shows the relationship between the Housing Executive and its sponsor department, the Department for Communities, and between the Board, its Committees and the Chief Executive and his Senior Management Team



Introduction: Board Operating Framework/Committee Terms of Reference

Within the Housing Executive, an Operating Framework has been developed for the Board and Terms of Reference developed for the Board's Audit & Risk Assurance Committee, DLO Performance & Development Committee and for other senior management committees.

The Board Operating Framework

The Board Operating Framework 2015 sets out the role of the Housing Executive Board; how it conducts business; its administrative processes with regard to meetings, minutes, conflict of interests, committee structure and how the Board's performance is evaluated and reviewed.

The Board shall:

- Establish the overall strategic direction of the NIHE within the policy and resources framework determined by the Minister
- Oversee the production of a Corporate Plan including determination of key strategic objectives and targets as approved by the Minister
- Ensure that the organisation fulfils the aims and objectives set out in the Corporate & Business Plans and promote the economic, efficient and effective use of staff and other resources by the NIHE
- Ensure DFC is kept informed of any changes likely to impact on the strategic direction of the NIHE or on the attainability of its targets and determine the steps needed to deal with such changes
- Receive and review up to date financial/managerial information concerning the management of the NIHE; be informed in a timely manner about any concerns about the activities of the NIHE; and provide assurance to DFC that appropriate action has been taken on such concerns
- Appoint, with DFC approval, a Chief Executive to the NIHE and, in consultation with DFC, set performance objectives and remuneration terms linked to these objectives for the Chief Executive, which give due weight to the proper management and use of public monies
- Oversee performance including financial performance, the efficiency and effectiveness of operations and the quality of services
- Take due account of risk analyses and performance measures
- Consider all matters reserved to it under the Board Scheme of Delegations
- Ensure the proper delegation of responsibility and accountability for specified matters to individual Board Members (Members) or Committees of
- Ensure compliance with the Public Service Values as set out in Appendix 1 of the Terms of Reference

Code of Practice - Board Members

The NIHE's Code of Practice for Board Members 2014, (the Code), provides key governance information for members on their roles and responsibilities as Board Members in accordance with Cabinet Office guidance. The Code is agreed with the Department for Communities as the Housing Executives sponsor department.

The Code provides details of the register held to record any conflict of interests and emphasises the need for Board Members to update this register regularly and at least annually.

The Code also includes and emphasises the importance of Members' observation of adherence to, the 'Nolan Principles' for conduct in public life.

http://www.nihe.gov.uk/code_of_practice_board_members.pdf

Standing Orders and Board Scheme of Delegations

Standing Orders are a key governance document for any Board and help ensure transparent and effective decision making. Standing Orders regulate the proceedings, meetings and business of the Authority and its Committees.

- Part A of the Housing Executive's Standing Orders sets out a range of matters including procedural requirements in terms of meetings, papers submitted to the Board, disclosure of interests, Committees of the Board, Delegation by the Board and Emergency Action
- Part B sets out the necessary procedures to be followed in relation to issues such as approvals for expenditure, disposal of assets, procurement, budgets and annual accounts, internal audit, salaries and wages and the administration of the Housing Executive

Included in this document is the Board Scheme of Delegations which sets out the powers reserved to the Board and those delegated to the Chief Executive at the Chief Executive's Business Committee, and those delegated to specific posts within the organisation. This section also provides information on residual matters to be decided at the Chief Executive's Business Committee together with the action to be taken in relation to claims against the organisation.

http://www.nihe.gov.uk/standing_orders.pdf

The Audit and Risk Assurance Committee Terms of Reference

The Audit and Risk Assurance Committee (ARAC) is an advisory and scrutiny body with no executive powers. The Audit and Risk Assurance Committee supports the Accounting Officer and Board by reviewing the comprehensiveness and reliability of assurances on governance, risk management, the control environment and the integrity of financial statements and the annual report. The ARAC operates in accordance with the Audit Risk and Assurance Committee Handbook NI as specified in DAO 05/14.

The Committee, which comprises three Board members and two Independent members, meets on a quarterly basis. An update is provided by the Chair of the ARAC to the following Housing Executive Board meeting. An annual report is produced by the Chair of ARAC which outlines the effectiveness of the Committee and the scope of work undertaken during the year. This report is also presented to the NIHE Board.

http://www.nihe.gov.uk/index/about/corporate_governance/key_governance_documents/terms_of_reference/audit_risk_assurance_committee_tor.htm

DLO Performance & Development Committee Terms of Reference

The DLO Performance and Development Committee is an advisory and scrutiny body with no executive powers and is responsible for providing assurance to the Board on the effectiveness and efficiency of management, performance, governance, and compliance control in respect of the DLO. The Committee, which comprises three Board members and two Independent members, meets with the Housing Executive Chief Executive, relevant Directors and DLO management six weeks prior to the Landlord Services Board Meeting.

Emerging risks will be identified and brought to the Board and the ARAC as appropriate. The Chair of DLO Performance and Development Committee will provide an update to the Housing Executive Board after each meeting.

http://www.nihe.gov.uk/dlo_management_performance_committee.pdf

The Chief Executive's Business Committee Terms of Reference

This Committee considers matters delegated to the Chief Executive at the Chief Executive's Business Committee, under the Board Scheme of Delegations together with routine operational and cross divisional business within the Chief Executive's delegated limits. Other matters considered include the business calendar, matters carried forward from previous Chief Executive Business Committee meetings. The Committee also considers draft papers for submission to the Board and Audit & Risk Assurance Committee together with matters arising from both meetings.

Membership comprises the Chief Executive and all Directors together with the Head of Information & Secretariat. The Chief Executive's Business Committee is an open forum where the Chief Executive and Directors are expected and encouraged to challenge decisions and to raise any concerns on any papers submitted or issues discussed.

http://www.nihe.gov.uk/senior_management_committees_terms_of_reference.pdf

Corporate Performance Review Committee Terms of Reference

This Committee is chaired by the Director of Corporate Services and draws its membership from the Finance and Corporate Assurance Unit. The Terms of reference for the Committee requires it to monitor organisational performance against the Business Plan through review of the:

- Business Monitor
- Financial Monitor
- Risk Management
- Performance Management

The Committee also monitors progress against action points raised by the Board, Audit & Risk Assurance Committee and DLO Management Performance Committee through regular examination of the Matters Brought Forward List/Outstanding Matters List for each.

The Corporate Performance Review Committee is an open forum, where Directors and other participants are encouraged and expected to challenge decisions and raise concerns.

http://www.nihe.gov.uk/senior_management_committees_terms_of_reference.pdf

The Landlord Services Clearing House Committee Terms of Reference

The Landlord Services Clearing House Committee is chaired by the Director of Landlord Services (in the absence of the Director of Landlord Services the Landlord Clearing House should be chaired by the Director of Finance) and membership is drawn from the Landlord Services, Corporate Services and Finance Divisions.

The Terms of Reference for Landlord Services Clearing House requires the Committee to consider:

- The Scheme Delivery Processes and associated Capital and Revenue scheme papers
- Office Accommodation
- Commercial Property
- Building Contracts
- Planned Schemes related papers

Papers are approved by the Committee within limits delegated by the Board. The Committee also approves papers for submission for approval to either the Chief Executive's Business Committee or the Board in accordance with Standing Orders and the Board Scheme of Delegations.

http://www.nihe.gov.uk/senior_management_committees_terms_of_reference.pdf

The Regional Services Clearing House Committee Terms of Reference

The Regional Services Clearing House Committee is chaired by the Director of Regional Services (in the absence of the Director of Regional Services the Regional Clearing House should be chaired by another Director) and membership is drawn from the Regional Services, Corporate Services and Finance Divisions.

The Terms of Reference for Regional Services Clearing House requires the Committee to consider:

- A range of Land & Property papers under the limits contained within relevant Standing Orders and the approved Board Scheme of Delegations

http://www.nihe.gov.uk/senior_management_committees_terms_of_reference.pdf

PART FOUR:

Staff Code of Conduct (The Staff Code) 2015

This document sets out the Code of Conduct (the Staff Code) for Housing Executive Officers and forms part of the contractual relationship between the Housing Executive and its Officers. It sets out the standards and behaviours required of all Housing Executive employees and workers, (permanent, temporary, or otherwise, and whether employed directly by the Housing Executive or through an agency).

The purpose of the Staff Code is to protect the Housing Executive and its Officers in carrying out its functions, to provide clear information on the conduct and behaviour that is required as an Officer of the Housing Executive, and to encourage consistent standards throughout the Organisation.

All Officers must familiarise themselves with the contents of the Staff Code and act in accordance with the principles set out in it. Officers must ensure that they understand this document and if they have any doubts about any aspect they should in the first instance approach their Line Manager for clarification, and thereafter the Human Resources Department.

It is important to note and understand that any breach of the terms of the Staff Code will be dealt with in accordance with the provisions of the Housing Executive's Disciplinary Procedure. Serious or recurring breaches of the Staff Code may be considered as Gross Misconduct under the Housing Executive's Disciplinary Procedure with the potential to lead to dismissal.

The Staff Code will be kept under review and any subsequent revisions will be communicated to officers.

This Staff Code builds on, and is in keeping with the Housing Executive's Core Values, and the Seven Principles of Public Life as articulated by the Nolan Committee on Standards in Public Life. Housing Executive Officers must abide by and demonstrate commitment to these principles and values in the course of their employment.

http://www.nihe.gov.uk/staff_code_of_conduct.pdf

Whistleblowing Procedures

All of us at one time or another may have concerns about what is happening at work. However, when it is about unlawful conduct, a possible fraud or a danger to the public or the environment, or other serious malpractice, it can be difficult to know what to do.

The purpose of this Whistleblowing Procedure is to reassure employees that it is safe and acceptable to speak up. The Procedure also enables employees to raise any concern about malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer employees to raise the relevant matter when it is still a concern.

http://www.nihe.gov.uk/senior_management_committees_terms_of_reference.pdf

PART FIVE:

Risk Management Framework

The Housing Executive is committed to the management of risk in order to achieve its corporate goals and objectives. A risk management strategy was developed in 2016/17 which aimed to outline our strategic approach to risk management. Furthermore the risk policy and processes were enhanced to ensure best practice is adopted.

NIHE also developed a risk appetite statement, which will assist us in being open and transparent in our approach to managing risk and risk exposure.

Whilst the Board has overall responsibility for ensuring risk management within NIHE is effective, it has delegated the oversight of risk management activities to the Audit and Risk Assurance Committee. Furthermore the Chief Executive (Accounting Officer), along with the senior management team, has responsibility for identifying and managing strategic risks in conjunction with Board and ARAC. They also maintain oversight and scrutiny of the operational effectiveness of the risk and assurance frameworks.

NIHE has adopted a 5 stage approach to identifying and managing risk. This approach is in line with the NIAO best practice. The risk management policy and process document provides detailed information on how the five stage approach is applied and information on roles and responsibilities.



Risks are captured within a variety of risk registers, with the Corporate Risk Register capturing those which are strategically significant and requiring Board and ARAC consideration. A general risk and governance update, which includes a copy of the Corporate Risk Register, is provided to the monthly Performance Review Committee and quarterly to the Board and ARAC.

Whilst NIHE continuously horizon scans for new and emerging risks, in 2017/18 it is proposed that NIHE will introduce a new and improved Corporate Risk Register. This register will have the 8 themes identified within the risk appetite statement, associated risks; proposed action plans with target dates and will capture the agreed appetite for each theme.

Risk Assurance Framework

The NIHE has adopted the three lines of defence model as its assurance framework; this is supported by a mapping template for identifying not only risks but where assurance comes from at each line of defence.

This model is widely accepted as best practice within both the public and private sectors. It has been highlighted by the Institute of Risk Management as a standard operating model and was introduced into the wider public sector through Her Majesty's Treasury (HMT) document Assurance Frameworks 2012.

The first line of defence is all staff, the second line reflects our policies, procedures, Board and Committees and, finally, the third line of defence is represented by our internal and external audit functions. This provides a robust framework for managing risk effectively.

However, the Departmental Arm's Length Bodies Quarterly Assurance Process and our regularly accountability meetings also feed into our assurance framework.

The Department's Management Board requires assurance that all Arm's Length Bodies are operating effectively, have business planning processes in place, are achieving desired outcomes while stringently monitoring budgets and are meeting their strategic objectives through effective risk management in a manner that is in accordance with all statutory requirements.

To ensure this, NIHE have in place an assurance process whereby quarterly assurance statements are signed off by Assistant Directors and Directors for their areas of responsibility. These are underpinned by the NIHE Risk Management process and are used to produce the Organisation's Quarterly Stewardship Statement which is signed off the Chief Executive and Chairman before being submitted to the Department to provide the required assurance.

http://www.nihe.gov.uk/index/about/corporate_governance.htm

Corporate Plan

The Corporate Plan sets out the Housing Executive's principal goals and objectives for the years ahead. It is a 3-year plan with particular focus upon the actions which will be taken in the first of those years. Those actions go to make up the Business Plan for the year and performance against that Plan is monitored each month by the Board.

The Corporate Plan provides a broad analysis of the environment in which we deliver our services. This will include reference to the Programme for Government along with other Government policies relating to housing; the financial context; the circumstances of the housing market generally; and other developments which affect the business or the people we serve.

The Plans are developed on foot of broad consultations with the community and voluntary sector, partner organisations within and without the public sector, our staff and political representatives via the Northern Ireland Housing Council. The Board sets the scope of the plans following those consultations. A final draft is sent to consultees prior to final endorsement by the Board and subsequent submission to the Minister for Communities for approval.

The approved plan effectively forms:

- Our commitment to the people we serve
- Our commitment to Government and a demonstration of how we will conduct our stewardship of the public funds which we manage
- A set of actions against which our performance can be measured and judged

The latest Corporate Plan can be found at www.nihe.gov.uk/corporate_plan

Fraud & Irregularity Procedures

Counter Fraud & Related Offences Strategy; and Procedural Response Plan.

The Housing Executive provides a wide and varied service to all its clients and stakeholders which puts it at risk of loss due to fraud or related offences both from within and outside the organisation.

The Housing Executive is committed to a culture of honesty, openness, transparency, and non-discriminatory practice, and expects all staff at all times to act honestly and with integrity and to safeguard the public resources for which they are responsible. To complement this, the organisation is committed to ensuring that opportunities for fraud are reduced to the lowest possible level and in so doing have six key objectives:

- The development and continuous promotion of an anti-fraud culture
- Maximising the deterrence of fraud
- The successful prevention of fraud which cannot be deterred
- The prompt detection of fraud which has not been prevented
- The professional investigation of detected fraud
- The application of effective sanctions, and redress, including appropriate legal action

The statutory and regulatory framework within which the Housing Executive functions complemented by a risk based approach enabling targeting of resources at problem area 'hot spots' can be considered as a set of risks to be managed alongside other business risks.

Best practice derived from DAO/FD (DFP) letters (09/15 Managing Fraud Risk in a Changing Environment; 09/16 Good Practice Procedures in Fraud Investigation), and Managing Public Money (NI) have been adopted and rigorously applied.

http://www.nihe.gov.uk/fraud_and_irregularity_policy_and_procedures.pdf

Complaints Procedure

The Housing Executive operates a Complaints Procedure for the benefit of customers who wish to appeal against decisions taken or make representations about the manner in which their case has been handled.

The procedure provides for a two tier process: first stage complaints are investigated by the Regional/Grants/Land & Property Manager, and if still not satisfied, the complainant may then appeal to the Chief Executive. The procedure also allows for cases to be referred back to the Area Manager to be investigated informally.

Where a complainant, after Stage 2, remains dissatisfied, she/he has recourse to the Commissioner for Complaints who may decide to investigate the case independent of the Housing Executive.

The Housing Executive is committed to:

- Putting the customer first
- Providing a high quality customer service
- Dealing with complaints quickly and fairly
- Keeping complainants informed about their complaint and assisting them in the process
- Keeping all the information provided confidential
- Explaining the Housing Executive's decision
- Using complaints and feedback to review our services

http://www.nihe.gov.uk/complaints_procedure.htm

Environmental Policy

Our environmental policy is to ensure that all of our activities and decisions make a positive contribution to the Sustainable Development Strategy for Northern Ireland.

Concern for environmental conditions and best use of resources is part of our business strategy.

Our policy is to:

- Maintain an independently accredited Environmental Management System

- remain committed to legal compliance and continual improvement of our Environmental Management System
- Train all staff in sustainable development awareness and provide specialist training as needed
- Develop and maintain targets in keeping with the NI Sustainable Development Strategy
- Apply the Reduce, Re-use, Recycle approach to waste streams
- Prevent pollution of air, land and water
- Monitor and report regularly on our contribution to the Northern Ireland Sustainable Development Strategy
- Support initiatives to develop sustainable local communities
- Offer environmental and sustainability advice to business, community and voluntary sector stakeholder organisation

http://www.nihe.gov.uk/environmental_policy.pdf

Rural Proofing

The Rural Needs Act was granted Royal Assent on 9th May 2016. This primary legislation not only places a statutory duty on all central government departments and local councils to pay due regard to rural needs when developing and implementing government policies and strategies and delivering public services, but also requires them to compile, and make available in an open and transparent manner, information on how they have met that duty.

The Housing Executive has endorsed and implemented rural proofing since it was first introduced in 2002. The attached policy/procedure is in place to rural proof all new and revised corporate strategies and policies and a training programme has been delivered to ensure that policy owners are aware of their responsibility to consider whether a new policy will have a disproportionate impact on rural customers.

The Rural Needs Act 2016 will come into full effect for arms-length bodies including the Housing Executive in April 2018. We are currently awaiting direction from DAERA on how our current policy/procedure and training package should be updated to reflect the new legislation.