

Readers may note that some information within these documents have been omitted / redacted.

Some information has been omitted / redacted as disclosure may prejudice the commercial interests of Irvine Housing Association trading as Riverside Scotland.

We recognise that the commercial sensitivity of information may decline over time and the harm arising from disclosure may be outweighed by the public interest in openness and transparency. We commit to review the redaction of any such information from time to time.

Some information has been redacted as it contains personal data which identifies an individual. Disclosure of this information would place Irvine Housing Association t/a Riverside Scotland in breach of the Data Protection Act 2018.

**246<sup>th</sup> Board Meeting of Irvine Housing Association Ltd:  
 Thursday 27 January 2022 at 5.30 p.m. via MS Teams video conference**

**AGENDA**

		<b>Data Class</b>
1.	Apologies for Absence	
2.	Declarations of Interest	
3.	Previous Minutes – Minutes of the 245 <sup>th</sup> Board Meeting held on Thursday 2 December 2021	Public
4.	Matters Arising	
5.	Substantive Business	
5.1	Financial Plan	Restricted
5.2	Chair's Action Procedure	Public
5.3	Membership Register	Public
5.4	Risk Management Policy	Public
5.5	Allpay Indemnity (to support customer refunds)	Restricted
5.6	Fire Risk Assessments – Stay Put Policy	Public
5.7	National Housing Federation – Code of Governance	Confidential
5.8	Progress Reports on Development Projects	Confidential
5.9	Operational Performance Report	Public
5.10	Financial Performance Report	Restricted
5.11	MD Report	Confidential
6.	Minutes/Updates: a) Confirmed Group Customer Experience Committee Meeting Minutes – 2 December 2021 b) Group Board Core Brief – December 2021	Confidential  Confidential
7.	Disclosure	

8.	Any Other Business	
9.	Date of Next Meeting – Thursday 31 March 2022 at 5.30 p.m. – 247 <sup>th</sup> Board Meeting held via MS Teams / 44-46 Bank Street, Irvine, Ayrshire (TBC)	

DMcL / db  
10/1/2022

## 5. Substantive Business

## 5.2. Chair's Action Procedure

Date:	27 January 2022
Subject:	Chair's Action Procedure
Author:	Donna Boyle, Governance & Company Secretarial Assistant
Sponsor:	Diana MacLean, Managing Director
Appendices:	Appendix 1: Chair's Action Procedure
Action:	For noting
Data Class:	Public

### EXECUTIVE SUMMARY

On 7 December 2021, Group's Governance and Remuneration Committee considered and approved Patrick New's appointment as a Board Member of Irvine Housing Association Ltd to replace Cris McGuinness. Following notification to the Association of the appointment on 8 December, the Chair was advised of this change and thereafter formally noted the appointment of Patrick New to the Board under Chair's Action Procedure and notified the Board accordingly.

### RECOMMENDATION

The Board is asked to note the Chair's decision in line with the Chair's Action Procedure to note the appointment of Patrick New to the Board of Irvine Housing Association Ltd., to replace Cris McGuinness as Group's Nominee.

## 1 Background

- 1.1 The Association's Governance Framework document provides, at paragraph 1.8 that where urgent decisions which do not permit delay are necessary between meetings, the Chair is authorised to take decisions with the advice of the Managing Director, or Executive Team (as the case may be) and following as wide a consultation with Board or Committee Members as time permits.
- 1.2 On 7 December 2021, Group's Governance and Remuneration Committee considered and approved Patrick New's appointment as a Board Member of Irvine Housing Association Ltd., to replace Cris McGuinness.
- 1.3 Following notification to the Association of the appointment on 8 December, the Chair was advised of this change.
- 1.4 On receipt of the formal minute of agreement of this decision by Group's Governance and Remuneration Committee, the Chair formally noted the appointment of Patrick New to the Board under Chair's Action Procedure and notified the Board of Patrick's appointment to the Board, replacing Cris McGuinness.

## 2 Recommendation

The Board is asked to note the Chair's decision in line with the Chair's Action Procedure to formally note the appointment of Patrick New to the Board of Irvine Housing Association Ltd., to replace Cris McGuinness as Group's Nominee.

## 5.3. Membership Register

Date:	27 January 2022
Subject:	Membership Register
Author:	Donna Boyle, Governance & Company Secretarial Assistant
Sponsor:	Diana MacLean, Managing Director
Appendices:	Appendix 1: Members proposed for removal following 2021 AGM
Action:	Decision
Data Class:	Public

### **Executive Summary**

The Association aims to maintain a Register of Members who are interested in the affairs of the Association.

The Association's Rules provide that the Board can pass a resolution that deems membership to have been withdrawn and an ordinary share cancelled in certain circumstances, such as failing to attend or submit apologies for five consecutive AGMs.

An analysis of attendance at the 2021 AGM has identified that 10 members have now failed to attend or submit apologies for five consecutive AGMs.

### **Recommendation**

It is therefore recommended that the Board pass a resolution that:

“The 10 members identified at Appendix 1 shall be deemed to have withdrawn from membership of the Association and his / her ordinary share shall be cancelled and the amount paid thereon shall become the property of the Association”.

## **1 Background**

- 1.1 The Association currently has 67 members on its Register of Members.
- 1.2 In line with the Association's Membership Policy, we aim to attract interested people into Membership of the Association.
- 1.3 Rule 15(a) states:

“Where the Board is satisfied that:

- (ii) an ordinary member has failed to either attend or submit apologies for five consecutive annual general meetings;

that member shall be deemed to have withdrawn from membership of the Association and his / her ordinary share shall be cancelled and the amount paid

thereon shall become the property of the Association with effect from the passing of a resolution by the Board to that effect.”

- 1.4 An analysis of attendees at the 2021 AGM has identified 10 members who have now failed to attend or submit apologies for five consecutive AGMs. Details of this analysis are attached at Appendix 1.

## **2 The Proposal**

- 2.1 It is recommended that the members identified in Appendix 1 are removed from the Register of Members in accordance with Rule 15(a) and all associated records updated accordingly.
- 2.2 This will ensure that the Association has a Register of Members who remain interested in its affairs and the Association’s records remain current.
- 2.3 It is intended that the members in question will be advised in writing of their removal from the Membership Register.

- 3 **Risk:** That the Association maintains a Membership Register which is not up to date and current and wastes resources communicating with those who no longer wish to participate as a member.

**Mitigation:** By removing members who no longer engage with the Association, we ensure that we maintain an active Membership Register.

## **5 Recommendation**

It is therefore recommended that the Board pass a resolution that:

“The 10 members identified at Appendix 1 shall be deemed to have withdrawn from membership of the Association and his / her ordinary share shall be cancelled and the amount paid thereon shall become the property of the Association”.

## Irvine Housing Association - Board Meeting

Share No	Date Registered	2017	2018	2019	2020	2021
62	5/4/1998	N1	N2	N3	N4	N5
53	5/4/1998	N1	N2	N3	N4	N5
213	11/27/2007	N1	N2	N3	N4	N5
232	11/20/2009	N1	N2	N3	N4	N5
287	1/29/2010	N1	N2	N3	N4	N5
296	3/17/2010	N1	N2	N3	N4	N5
316	3/18/2010	N1	N2	N3	N4	N5
333	6/24/2010	N1	N2	N3	N4	N5
392	3/16/2011	N1	N2	N3	N4	N5
555	7/16/2015	N1	N2	N3	N4	N5

## 5.4. Risk Management Policy

Date:	27 January 2022
Subject:	Risk Management Policy and Procedures
Author:	Morag Hutchinson Head of Finance & Planning
Sponsor:	N/A
Appendices:	Appendix 1 : Risk Management Policy Appendix 2 : Riverside Scotland Risk Procedures
Action:	Decision
Data Class:	Public

## EXECUTIVE SUMMARY

This Report is presented to the Board to allow it to consider and adopt the updated Group-wide Risk Management Policy. Within the framework of that Policy, Board are also asked to consider the revised Riverside Scotland Risk Procedure document. The Risk Policy and the Risk Procedure have been considered, and are recommended to the Board for adoption, by the Audit and Risk Committee

## RECOMMENDATION

Board is asked to:

- Adopt the Risk Management Policy.
- Consider and agree the Riverside Scotland Risk procedures.

## 1 Background

- 1.1 The Association's Constitutional Partnership Agreement and Policy Approval Framework agreed that the Association would adopt the Riverside Group-wide Risk Management Policy.

## 2 Risk Management Policy

- 2.1 As part of the normal review cycle, the Group's Risk Management Policy has been reviewed. The review was minor in nature and included no strategic changes.
- 2.2 The revised Risk Management Policy, which was approved by Group Audit Committee in September 2021 is attached as Appendix 1.
- 2.3 The Policy is presented in the standard Riverside format.
- 2.4 When it met on 10 January 2022, Audit & Risk Committee agreed to recommend the policy to Board for adoption.

## 3 Riverside Scotland Risk Procedures

- 3.1 The Risk Management Policy is a high level document. The Policy does not inhibit the Association in developing local procedures that will facilitate the Board in undertaking its duty to identify and manage risk.
- 3.2 The current procedures has been reviewed and, other than changes to reflect the recent rebranding exercise, remains unchanged. The Riverside Scotland Risk Procedure is attached as Appendix 2.

#### **4 Implications**

- 4.1 The operational implications associated with the Risk Management Policy and Procedures are set out below:
  - **Delivery:** Responsibility for the implementation of the Risk Management Policy and Procedure is delegated to the Managing Director, working in collaboration with Riverside's Director of Internal Audit and Risk
  - **Communications:** The new Risk Management Policy and Procedures will be communicated to all Riverside Scotland staff and will be made available to key business stakeholders on request.
  - **Risk:** The key risk associated with the Risk Management Policy and Procedures is that they do not adequately allow the Association to identify and manage risks.

#### **5 Equality, Diversity & Inclusion**

- 5.1 This paper aligns with our Equality, diversity and Inclusion policy.

#### **6 Recommendation**

- 6.1 It is recommended that the Board:
  - i) Adopt the Risk Management Policy.
  - ii) Consider and agree the Riverside Scotland Risk Procedures.



Transforming **lives**  
Revitalising **neighbourhoods**

# RISK MANAGEMENT POLICY

Audit & Risk

Policy Reference:

Policy Version:





## 1. Purpose

### Guidance

TRGL provides services to the most vulnerable members of the community. In addition, it operates in an increasingly uncertain external environment. All this emphasises the importance of robust risk management. The Policy has a number of objectives:

1. To ensure TRGL has a comprehensive understanding of the external risk landscape and uses its influence to help shape future policy.
2. To calibrate TRGL's risk appetite after due consideration by TRGL Board.
3. To ensure clear accountabilities for the managing risk and operating control measures.
4. To establish a robust approach to reporting and escalating risk including appropriate KPIs.
5. To robustly stress test the business plan to ensure the business operates within the risk appetite articulated in the Golden Rules.
6. To establish an appropriate framework of delegated authorities so that decisions involving risk are appropriately scrutinised.
7. To implement a suite of policies on how individual risks are managed.
8. To maintain a sound internal control and assurance framework including, where appropriate, internal and specialist assurance.
9. To develop a culture conducive to sound risk management so that colleagues are accountable, comfortable raising concerns and have a positive approach to learning from any failings.

## 2. Scope

### Guidance

The Policy sets out the risk management arrangements for TRGL including all subsidiaries.

The Policy applies to:

- a. The Riverside Group Limited including all legal entities/subsidiaries.
- b. All individuals working within or for TRGL, including permanent and temporary colleagues, non-executive Directors, contingent workers ie consultants, contractors, volunteers, third party agents and their employees.
- c. Collaborative activities with third party organisations, including joint ventures.

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### 3. Principles

TRGL will:

#### Risk appetite

- a. Agree its appetite for risk which it will articulate in a series of risk appetite statements approved by TRGL Board. Risk appetite will inform decisions about the extent of actions to be implemented to mitigate or avoid the risk.
- b. Calibrate its appetite for risks which might threaten its financial viability by setting a series of business Golden Rules approved by TRGL Board. The Treasury Policy and Strategy will set out how TRGL will meet the requirements of the Golden Rules in relation to liquidity and covenant compliance.
- c. Establish an Investment Policy which sets limits on the proportion of reserves available for commercial investment. TRGL will aim to maximise the return available to further its charitable objects while minimising the risk to the security of social housing assets. Investments will be priced with a rate of return which is commensurate to the level of risk.

#### Risk culture

- d. Embed 'Our Riverside Way' which, inter alia, supports risk management by promoting a culture of taking responsibility, doing the right thing, acting with integrity and complying with policies and procedures.
- e. Maintain Codes of Conduct setting out the behaviours and values expected of Board members and colleagues.
- f. Maintain an open culture so that colleagues are comfortable raising concerns about risk and that a positive approach is taken to learning from any risk or control failings.

#### Internal control environment

- g. Maintain a suite of policies which set out how the Group manages risk. The Group Policy Officer oversees the Group Policy Framework which is the definitive list of all policies and prescribes regular reviews to keep policies up to date and the requirements for consultation and approval.
- h. Maintain an appropriate framework of delegated authorities so that decisions involving risk are appropriately scrutinised. In particular, all investments are scrutinised by the Investment Appraisal Committee across a series of decision gates from concept through to post-completion.
- i. Maintain a register of significant legal and regulatory compliance requirements which clearly assigns responsibilities for control and assurance.

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j. Adopt the three lines of defence model where appropriate:

- First line — Managers and colleagues who own and manage risk.
- Second line — Functions who oversee or who specialise in compliance. These provide policies and tools as well as challenge to the First line. As examples, the Second line includes the Quality & Compliance functions in Care & Support and Social Housing, the central Health & Safety team and the Data Protection Manager.
- Third line — Functions that provide independent assurance. True Third line assurance sits outside of the First and Second line eg Internal Audit. In addition, Second line functions will commission external reviews to give assurance eg quality assurance on the gas maintenance programme.

Resources are allocated to the Second and Third line according to risk. Not all risk and control areas will be covered. Whether or not Second and Third lines of defence are in place, risk and control owners are responsible for ensuring and giving assurance on the adequacy of risk and control measures.

#### Risk identification

k. Continuously review the external and internal environment eg through periodic Board strategy events, the work of its Strategy & Planning team and its networks with other housing associations. TRGL will pay special attention to developments such as legislative changes, business environment, regulatory requirements, competitor activity, business growth and product development opportunities. TRGL will pursue an influencing strategy so that it gets early warning and can help shape external policy.

#### Risk mitigation

l. Design and implement risk mitigation strategies:

- Evaluate the level of inherent and residual risk according to impact and likelihood of the risk crystallising. Impact will be assessed against a range of criteria including reputation, business disruption, finance, legal and regulatory compliance and safety. If the inherent risk is greater than the risk appetite then risk mitigation strategies will be developed. These are:
  - **Accept** eg where the level of exposure is transient or within tolerance.
  - **Exit** the risk by terminating (or not starting) the activities driving the risk eg when Investment Appraisal Committee decline to approve development projects outside the Group's risk appetite.
  - **Reduce** by mitigation actions. This is the most common response.
  - **Transfer** for example through insurance or outsourcing. As an example, TRGL is increasingly moving to a cloud computing environment.

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Risk owners are tasked with implementing the agreed mitigation measures as well as assessing and reporting on the level of assurance that actions are effective.

### **Risk reporting and escalation**

- m. Maintain an up to date strategic risk register which is complemented by operational risk registers including for business change and development projects.
- n. Ensure risk registers are regularly reviewed by the executives and regularly scrutinised by Boards and Committees.
- o. Ensure that operational risks are escalated for possible inclusion in the Groupwide strategic risk register.
  - Operational risk registers are owned by Leadership Group who will escalate any significant risks or common themes to Executive Directors for escalation to TRGL Board and inclusion on the Group strategic risk register.
  - Members of TRGL Board are appointed to subsidiary and TRGL Board Sub-Committees and will escalate risks and concerns to TRGL Board.
- p. Maintain a series of risk metrics which are scrutinised by the executives and by Boards and Board Sub-Committees. In particular, these include safety and Golden Rule compliance
- q. Maintain a log of any significant breaches in its legal or regulatory compliance objectives reporting any incidents or breaches promptly to the relevant regulatory authority and proactively learning any appropriate lessons.
- r. Maintain a whistleblowing policy which sets out the arrangements by which colleagues may report on any matters of concern.

### **Risk resilience**

- s. Maintain a thorough, accurate and up to date record of its assets and liabilities.
- t. Carry out detailed and robust stress testing of the business plan against a range of adverse scenarios.
- u. Maintain statutory and prudent insurance against potential risks.
- v. Implement an appropriate framework for business continuity and recovery.

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### **Risk assurance**

- w. Ensure assurance is provided through transparent, timely and objective risk reporting which ensures senior management is fully aware of material risks to which TRGL is exposed.
- x. Maintain an independent internal audit function which has a direct reporting line to the Chair of the Group Audit Committee. The Internal Audit plan will be driven by the risk register as well as the Audit Universe model.
- y. Conduct an annual review of the effectiveness of internal control. This will be reviewed by the Group Audit Committee prior to being presented to the TRGL Board.

### **Training and support**

- z. Ensure that colleagues have an understanding of the Group's risk appetite, risk profile and risk mitigation measures as appropriate to their roles.
  - aa. Provide training for colleagues in the management of particular risks. This will include mandatory training for all colleagues together with more specialised training for those charged with managing the most significant risks. Examples of such training include health & safety, personal safety, safeguarding, data protection, equality & diversity.
  - bb. Maintain a suite of templates for capturing and reporting risks which can be used in the business where appropriate.

### **Equality & Diversity**

- cc. Carry out an Equality Impact Analysis on each new or updated policy to mitigate the risk of discrimination, prejudice or unfair treatment.

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## 4. Further Information & Support

### Guidance

This policy is accompanied by a Risk Management Procedure.

More widely, Group policies set out how the Group manages risk. The Policy Framework sets out, at any given time, the full list of Group policies. All policies include an element of risk management. Policies having a significant impact on risk include:

### Probity

- Anti-bribery and corruption
- Financial crime
- Whistleblowing

### Health & Safety

- Approval and control of contractors
- Colleague safety (full range of policies)
- Control of contractors
- Hazard and incident management
- Health Safety & Environment
- Landlord compliance (full range of policies eg gas, fire)

### Colleagues

- Code of Conduct
- Dignity at work
- People

### Customers

- Customer care
- Data protection and privacy
- Domestic abuse
- Mental capacity
- Safeguarding

### Business Resilience

- Business continuity
- Finance
- Income collection
- Information security
- Investment
- IT — Cloud and Governance
- Procurement
- Treasury

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## 5. Roles and Responsibilities

TRGL Board	<ul style="list-style-type: none"> <li>- Set the parameters for TRGL's risk appetite.</li> <li>- Ensure robust risk management is in place.</li> <li>- Annually review the effectiveness of the control environment.</li> <li>- Approve Group policies on how risks are managed.</li> <li>- Scrutinise the strategic risk register.</li> <li>- Scrutinise risk KPIs eg building safety, Golden Rules, margin and cash leakage.</li> <li>- Set a framework of delegated authority including which decisions need to be escalated to TRGL Board.</li> </ul>
Group Audit Committee	<ul style="list-style-type: none"> <li>- Advise the Board on risk management and internal control.</li> <li>- Scrutinise the strategic risk register.</li> <li>- Carry out deep dives into significant risks where appropriate.</li> <li>- Approve the annual internal audit plan and review its continued appropriateness as the year progresses.</li> <li>- Review internal audit findings including the rigour of the management responses to any identified weaknesses.</li> <li>- Scrutinise the annual review of the internal control framework prior to submission to TRGL Board.</li> <li>- Review, on behalf of TRGL Board, arrangements to ensure legal and regulatory compliance.</li> </ul>
Operational Board Sub-Committees ie Care & Support Committee and Customer Experience Committee	<ul style="list-style-type: none"> <li>- Review those aspects of the Group strategic risk register relevant to their own terms of reference.</li> <li>- Review operational risk registers focussed on their own areas of responsibility.</li> <li>- Identify Internal Audit priorities for consideration by Group Audit Committee. Review internal audit findings.</li> <li>- Communicate significant issues in relation to risk and control to Group Audit Committee and TRGL Board via the Operational Sub-Committee appointees.</li> <li>- In the case of the Care &amp; Support Committee, review periodic reports from the Second line Quality &amp; Compliance function.</li> </ul>

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<p>Executive Directors</p>	<ul style="list-style-type: none"> <li>- Implement procedures to manage strategic risks in line with the policies and risk appetite set by TRGL Board.</li> <li>- Operate the framework of internal control and periodically review its effectiveness.</li> <li>- Design and scrutinise a framework of KPIs measuring risk and business performance.</li> <li>- Ensure significant risks are captured via local operational risk registers and that appropriate mitigations are in place.</li> <li>- Review operational risk registers to identify any strategic risks which need escalating to the strategic risk register.</li> <li>- Ensure appropriate risk training is provided to colleagues.</li> <li>- Promote a risk aware culture across the Group.</li> <li>- From time to time, consider the continued appropriateness of the framework of Second and Third line defence.</li> <li>- Agree actions, changes or improvements to key elements of the process and risk management framework.</li> </ul>
<p>Director of Governance and General Counsel</p>	<ul style="list-style-type: none"> <li>- Oversee arrangements to ensure the Group complies with its legal and regulatory compliance responsibilities.</li> <li>- Own the overall governance arrangements for health &amp; safety including oversight by Safety First Group, incident reporting, the policy framework and second line assurance provided by the Health, Safety &amp; Environment team.</li> <li>- Establish arrangements to capture control failures, legal and regulatory breaches.</li> <li>- Ensure that lessons learnt exercises are carried out after such failures and brought to the Governance community where appropriate.</li> <li>- Maintain statutory and prudent insurance.</li> <li>- Provide proactive legal advice to the business.</li> </ul>
<p>Risk owners</p>	<ul style="list-style-type: none"> <li>- Implement the agreed mitigation strategies.</li> <li>- Assess the effectiveness of those actions and the available assurance and take corrective action if needed.</li> <li>- Ensure mitigations are documented and keep the risk register up to date.</li> <li>- Escalate concerns to Executive Directors eg new risks or control failures.</li> </ul>
<p>Colleagues</p>	<ul style="list-style-type: none"> <li>- Comply with Group policies.</li> <li>- Complete mandatory training.</li> <li>- Escalate emerging risks to line managers.</li> <li>- Manage the risks associated with their operational processes and activities.</li> </ul>

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## 6. Risk Thresholds

The Risk Policy is very much an overarching one and the detail on how particular risks are managed is covered elsewhere eg Treasury Policy and Health & Safety Policy. Where appropriate, these policies articulate the appetite statements and risk thresholds that convert the risk statement into measurable metrics.

## 7. Equality, Diversity and Inclusion

TRGL is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with TRGL's [Equality, Diversity and Inclusion Policy](#) and has been subject to an Equality Impact Assessment.

Policy Reference:

Policy Version:



**Document Control (Internal Use ONLY)**

Version	V1
Reference	
Total Pages	11
Policy Sponsor	Carol Matthews
Policy Owner	Stuart Gambling
Policy Writer	Stuart Gambling
Review Date	October 2024
Knowledge Tags	
Data Classification	

**Change Category (Internal Use ONLY)**

Category of Change	Tick Box
Minor Changes (Non-Strategic)	Yes
Major Changes (Re-Write)	
Summary of Changes Made	
General update to reflect changes since the last review.	

**Quality Assurance and Approval (Internal Use ONLY)**

Consultation and Approval	Tick Box	Date
Associated Documents Reviewed	Yes	16.7.21
In Consultation with: Prospect, Evolve, Irvine, Key risk owners including Treasury, Health & Safety, Business Continuity, IT and Health & Safety Accountable Risk Leads.	Yes	Various
Executive Directors	Yes	24.8.21
Director of People and Culture	Yes	10.8.21
UNITE Convenor	Yes	2.8.21
Governance (where applicable)	Yes	30.7.21
EQIA Complete	Yes	16.7.21
DPIA Complete	Yes	10.8.21
Document stored in xxx		

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## **Riverside Scotland – Risk Procedure**

Riverside Scotland is the trading name of Irvine Housing Association Ltd.

Riverside Scotland is a non-profit organisation, registered under the Co-operative and Community Benefit Societies Act 2014. Registration No. 2459 R(S) and Registered with The Scottish Housing Regulator No. HAL 280 and a registered Scottish Charity No. SC042251.

The Board is accountable for ensuring there is a robust approach to the identification and management of risk in line with the legal and regulatory status of the Association and the Constitutional Partnership Agreement.

Riverside Scotland is a subsidiary of The Riverside Group Limited (TRGL) controlled through the Association's Rules. The risks faced by TRGL, therefore, present risks to the Association and, accordingly, the risks faced by the Association present risks to TRGL.

The Group relationship means that the Association's approach to risk should take account of its subsidiary status, be complimentary to, and consistent with the approach to risk taken by TRGL.

### **Risk Management Policy**

As agreed by the Constitutional Partnership Agreement, and subsequently by the agreed Policy Approval Framework, the Association will formally adopt the Risk Policy of Riverside.

Within the context of this Risk Policy the following will apply within Riverside Scotland:

### **Audit and Risk Committee**

The Association will maintain an Audit and Risk Committee as a sub-Committee of the Board. The terms of reference, including the membership, of the Audit and Risk Committee will be agreed by the Board. The Audit & Risk Committee will assist the Board discharge its statutory and regulatory responsibilities in relation to the financial statements, audit, risk and control.

### **Risk Register**

The Association will maintain a Risk Register that is the responsibility of, and owned by, the Association's Board. The risks faced by the Association will be considered annually by the Board, usually at a strategic planning or similar event. The Risk Register will be reviewed by the Board every six months and be subject to more detailed scrutiny and consideration at every meeting of the Audit and Risk Committee.

The Risk Register will take account of the themes of the Riverside Risk Register in so far as they impact on the Association.

The Risk Register will set out the critical risks faced by the Association, their consequence, scores as to the impact and likelihood, risk mitigation actions, the direction of travel of the risk, management and control mechanisms and accountability. The maintenance of the Risk Register will be delegated to the Association's Managing Director.

### **Performance Management and Risk**

The Association will maintain a performance reporting framework to Board that will include Key Performance Indicators that relate to areas of critical business risks. e.g. cash KPI's, landlord compliance KPIs and customer satisfaction KPIs.

### **Policies and Risk**

The Association will maintain a suite of Policies as identified in the Policy Approval Framework. These will include Policies established to set out the approach to the management of key risk areas, e.g. Health and Safety, Data Protection, Asset Compliance, Treasury Management etc. These will be consistent with Riverside Group policies but will take account of local, legal and regulatory circumstances applicable to Riverside Scotland.

### **Internal Audit**

The Audit & Risk Committee will oversee a programme of internal audits. The annual audit plan will be agreed by the Audit & Risk Committee in conjunction with the Managing Director. The annual plan will take account of the Riverside Scotland Risk Register, the view of Riverside Scotland Management and Audit & Risk Committee as well as the high level priorities set by Group Audit Committee.

The reports and subsequent management actions coming from Internal Audits will be made to and monitored by the Audit and Risk Committee.

The Chair of the Audit & Risk Committee has the right of access to the Chair of the Group Audit Committee in case of any concerns about risk, the performance of the internal audit team or the coverage of the internal audit plan.

In order to fulfil its statutory and regulatory duties, it is important that the Audit & Risk Committee has visibility of significant findings and assurance from audits on Group wide processes which encompass Riverside Scotland and from audits on the Group owned central systems on which Riverside Scotland relies. The Internal Audit team will provide periodic summaries of this work to the Audit & Risk Committee. Copies of relevant Group Audit Committee papers will be made available to the Audit & Risk Committee. The annual Groupwide review of the Internal Control Framework will be presented to the Audit & Risk Committee.

## 5.6. Fire Risk Assessments – Stay Put Policy

Date:	17.1.2022
Subject:	Fire Safety Stay Put Policy for Communal Blocks
Author:	Heather Anderson
Sponsor:	Lisa Roberts – Head of Compliance for Fire Safety
Appendices:	N/A
Action:	Information
Data Class:	Public
<p><b>EXECUTIVE SUMMARY</b></p> <p>This paper sets out the rationale and reasoning to support the Association’s adoption of a Stay Put evacuation strategy across all communal blocks from 1<sup>st</sup> March 2022, as recommended by recent Fire Safety Risk Assessments and guidelines.</p>	
<p><b>RECOMMENDATION(S)</b></p> <p>The Board is asked:</p> <ul style="list-style-type: none"> <li>▪ To note the adoption of a Stay Put fire evacuation strategy applicable to all communal blocks from 1<sup>st</sup> March 2022, and the rationale and guidance supporting this.</li> </ul>	

## 1 Background

- 1.1 Riverside Scotland has two Retirement Living complexes and an additional 33 communal blocks (25 in Ayrshire and 8 in Dumfries). None of these properties are multi storey.

As part of our Fire Safety Policy, a Fire Risk Assessment (FRA) was completed for all communal blocks throughout 2020 by Savills surveyors and Fire Safety consultants. The key legislation and guidance governing the Fire Risk Assessment process is the ‘Fire (Scotland) Act 2005’, enacting the ‘Fire Safety (Scotland) Regulations 2006’, the ‘Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation 2017’, and the Housing (Scotland) Act 1987 (Tolerable Standard) (Extension of Criterion) Order 2019, and the ‘Advice for Building Owners of Multi-storey, Multi-occupied Residential Buildings’ by the Ministry of Housing, Communities and Local Government in 2019.

The risk assessment report for the communal blocks recommended the following actions in relation to a Stay Put evacuation strategy:

- The properties are purpose-built blocks with an adequate standard of compartmentation. The current Simultaneous Evacuation strategy is considered appropriate for the common areas but not appropriate for tenants within flats.
- Stay Put is the recommended evacuation policy for all communal blocks. Simultaneous Evacuation procedure should be limited to common and staff parts of buildings only. This will reduce the impact of a fire alarm actuation upon vulnerable people who are not in a unit effected by fire, and free up management to concentrate on the evacuation of the common parts.
- Management should adopt a ‘Stay Put’ strategy for the tenants who are in unaffected units at time of fire alarm actuation.

Following completion of this report, discussions took place with Riverside Fire Safety colleagues and the Riverside Scotland Asset and Compliance teams, to agree an implementation plan to adopt a Stay Put evacuation strategy across all Riverside Scotland communal blocks from 1<sup>st</sup> March 2022.

## 2 Context

Given that adoption of a Stay Put strategy for Riverside Scotland is a change from the existing Simultaneous Evacuation procedure, Savills and the Riverside Head of Compliance were asked to provide further clarity and confirmation to the Senior Management Team on the rationale supporting this change, further clarification was provided as follows:

- National Fire Chiefs Council continue to endorse the approach to Stay Put.
- Savills are one of the UK's leading national fire consultants, Riverside has engaged Savills and they continue to document their recommendations for appropriate fire evacuation strategy within the Fire Risk Assessment for each building. Stay Put policy continues to be the main recommendation for purpose-built blocks of flats.
- The message to customers is clear, if there is a fire in their own flat then to leave the building, if a fire is elsewhere in the building it is safer to stay put in the flat.
- Purpose built blocks of flats are designed to contain a fire for a minimum of 60 minutes. The majority of flat fires are contained within the flat and tackled by the fire and rescue service, other flats are not normally affected.
- Our fire risk assessments help to ensure that the compartmentation within the common parts and means of escape is adequately protected, this helps to reduce the risk of a fire spreading.
- Riverside Scotland's FRA recommendations clearly indicate to operate a Stay Put policy across all communal blocks.

## 3 Implementation

Savills have confirmed that the following actions must be implemented by Riverside Scotland to facilitate the move to a Stay Put evacuation strategy from 1<sup>st</sup> March 2022:

- All individual flat doors within communal areas should be upgraded to ensure both sides of the door meet the performance requirement set out in the 'Advice for Building Owners of Multi-storey, Multi-occupied Residential Buildings' as advised by the Ministry of Housing, Communities & Local Government (MHCLG) in 2019. Management should confirm that suitable fire door test certificates are held and that these relate to the doors fitted. If adequacy cannot be confirmed it may be necessary for door sets to be replaced under a risk-based programme. The FRA states that the current individual flat doors within Riverside Scotland communal blocks have only been tested on one side and no certification is available to confirm both sides of the doors comply with the new guidance introduced in 2019. Savills have confirmed that due to the fact these communal blocks are not multi storey and categorised as low risk, Stay Put can be adopted from 1<sup>st</sup> March 2022 on the condition that all doors are upgraded and comply by 1<sup>st</sup> March 2024.

- All Fire Notices and signage should be replaced and updated to outline the new Stay Put evacuation strategy.
- Letters should be issued to all tenants living within communal blocks advising them of the move to a Stay Put policy, and the procedure to follow in the event of a fire elsewhere within the building.
- Local Scottish Fire and Rescue Services to be notified of our adoption of a Stay Put policy and applicable properties.
- The common fire detection and alarm system in the residential corridors should be reconfigured to support the Stay Put strategy in accordance with Fire Safety Guidance BS5839 - 6:2019 + A1: 2020.
- Person centred risk assessments should be completed for every particularly vulnerable Retirement Living tenant and reviewed on a regular basis.

#### **4 Next steps**

The Asset and Compliance team are progressing the above actions supported by Riverside Compliance colleagues. All actions will be completed prior to the 1<sup>st</sup> March 2022, except for the upgrade of individual flat doors, where a two year replacement programme has been confirmed as sufficient by Savills and Riverside Head of Compliance. Further to the notification letters, the Retirement Living Coordinator will discuss the move to a Stay Put policy individually with all Retirement Living tenants.

#### **5 Recommendations**

5.1 As described in the Executive Summary.

## 5.9. Operational Performance Report

Date:	14.1 2022
Subject:	Operational Performance
Author:	Heather Anderson
Sponsor:	N/A
Appendices:	Appendix 1 - Operational KPI's (Board), P9 29 November 2021 – 2 January 2022
Action:	Information
Data Class:	Public

**EXECUTIVE SUMMARY**

This paper and appendices sets out operational performance against our agreed KPIs as at the end of Period 9 2021.

**RECOMMENDATION(S)**

The Board is asked:

- To note the position against the operational KPIs as at period 9 2021 including the key risk areas and identified improvement actions.

**1 Background**

- 1.1 Performance against the current agreed KPIs is reported to each Board meeting using the performance reporting system, Tableau. The dashboards for operational performance and customer satisfaction as at the end of Period 9 of 2021 are attached to this report as Appendix 1.



As a result of the significant malware attack which disrupted all IT systems on 16<sup>th</sup> November 2021, with the exception of overall satisfaction, which has carried on throughout, all other customer satisfaction surveys have been on hold since 15<sup>th</sup> November, which will impact the figures. The complaints handling satisfaction score relates to the whole Group as there were not a sufficient number of responses to break this down specifically for Riverside Scotland. In addition, the customer satisfaction scores could not be obtained from the Tableau system directly and are therefore presented in table format.

**2 Performance Context**

- 2.1 The current KPIs for 2021/22 for Irvine are:
- Total unadjusted arrears (4 week average)
  - Void rent loss.
  - Rent Evictions

- Repairs timescales.
- Compliance
- Tenancy Turnover
- Tenancy Sustainability
- Overall satisfaction
- Listening to Views
- Repairs and Maintenance satisfaction
- Latest Repair satisfaction
- Complaints Handling satisfaction

### **3 Performance Update and Analysis**

#### *Customer Satisfaction*

Overall satisfaction has dipped slightly over the period and considerably from a peak in April/May 2021. Our overall satisfaction is largely reflective of our repairs and maintenance services. As a result of the malware attack, customers were only able to report emergency and health and safety repairs throughout December. There has also been a decline in quality of service provided by Mitie since they announced their withdrawal from future service delivery after March 2022. They are continuing to meet contractual obligations and the Asset Services Manager is working closely with the Mitie Regional Director to ensure services are maintained through until March 2022.

In total 12 repairs were completed out with timescales for the period. The majority of these were related to roof replacement works sub contracted by Mitie, where operatives did not attend within the timescales. All failures have been discussed with the contractor and addressed. The mobilisation plan for our new responsive repairs and gas services contracts is currently being implemented and overseen by the Asset Services Manager and Head of Service. The full repairs service including routine repairs resumed on Monday 10<sup>th</sup> January 2022. There are considerable issues across the sector with supplies of materials which has caused delays to some recent boiler repairs.

The malware attack caused disruption to the CSC telephony systems which meant that customers had very limited contact with our services throughout December. This will have undoubtedly caused frustration for customers and increased dissatisfaction. There has been a slight improvement in overall perception of repairs and maintenance, most likely due to the continuity of capital investment works which were largely unaffected by the malware attack.

#### *Compliance*

Gas safety check compliance is showing as 93% for the period due to being unable to upload Gas safety certificates onto the system during the IT disruption. All safety checks were physically completed with only one expiry due to Covid within the household – this check has now been carried out. Work is underway to retrospectively upload all certificates when the Promaster system is back up and running.

#### *Arrears*

We're currently unable to provide accurate arrears performance information via Tableau as a result of the malware attack, it is hoped that this will be back in place by end of Jan 2022. System access following the attack has been reinstated. Our customers encountered a significantly reduced service during this time, as we were

unable to provide account balances or support customers to make payments over the phone for approx. 10 days. No proactive arrears recovery took place for 8 weeks and this event in the run up to and over the Christmas break, when rent collection trends dip, is likely to result in an increase in arrears despite the rent-free periods which usually support a performance improvement.

The Income Management Officer and two Early Intervention Officers covering the Scottish arrears patch were set targets to reduce arrears to £420k (3.9%) by the end of March 2022. As we don't currently have access to performance information, we aren't able to say if these targets will be achieved by the end of the financial year.

A new Scottish Tenant Grant Fund administered by Local Authorities has been created, to support tenants accruing arrears during the pandemic to receive financial support to prevent rent evictions. We have made 7 applications to East and North Ayrshire funds and are now starting to see requests for information on these; none have been successful yet. The Dumfries scheme hasn't opened yet. The team report the biggest challenge is getting customers to engage with us to get their consent to apply. The Scottish Housing team continue to provide support by completing arrears visits, encouraging residents to make agreements to avoid legal action.

Rent free periods are due again in March which we hope will have a positive impact on arrears figures and support the team to move closer to our year-end target.

#### **4 Next steps**

- 4.1 A key priority for the senior management team for 2022/23 is to improve levels of customer satisfaction. The implementation of new repairs and maintenance contracts, with a key focus of performance on customer care, should support improvements in this area. A new Customer Plan is also being developed in conjunction with Riverside colleagues, which will include actions relating to improved customer communications and increased digitalisation options.

#### **5 Recommendations**

- 5.1 As described in the Executive Summary.

# Riverside Scotland: Operational KPIs (Board)

P9 29 November 2021 – 2 January 2022

# Riverside Scotland: Operational KPIs - Board...

Rent Evictions

**0**

Repairs Completed in Ti..

**96.7%**

Total Repairs: **3,933**

Gas Compliance

**93.40%**

Expired: **149**

Tenancy Turnover

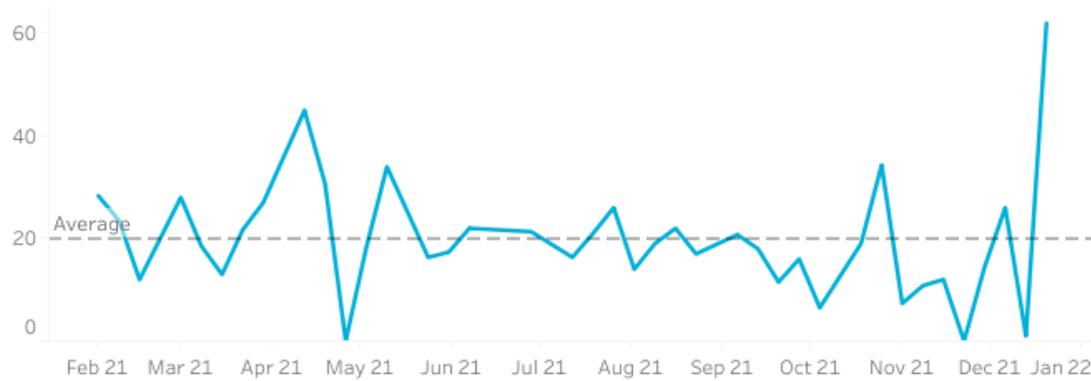
**3.6%**

Tenancies Ended: **83**

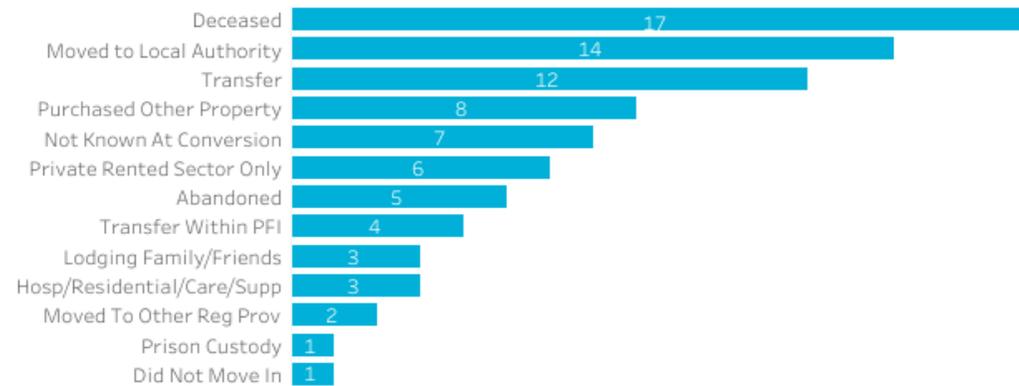
Tenancy Sustainability

**5**

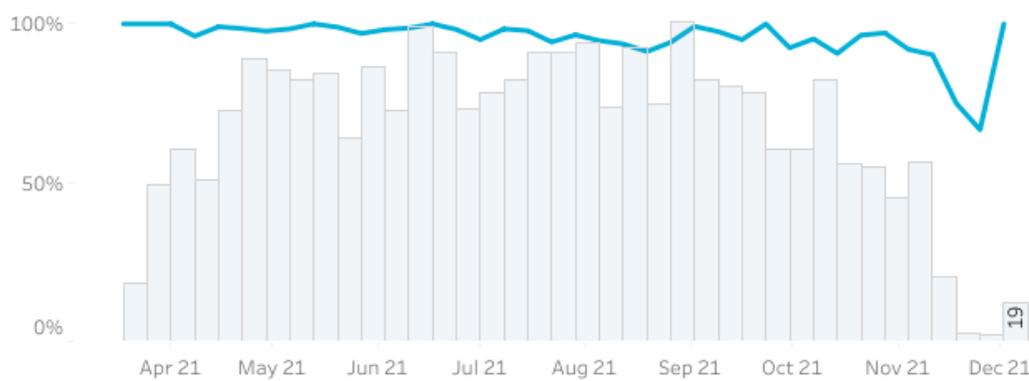
Average Relet Days Week by Week



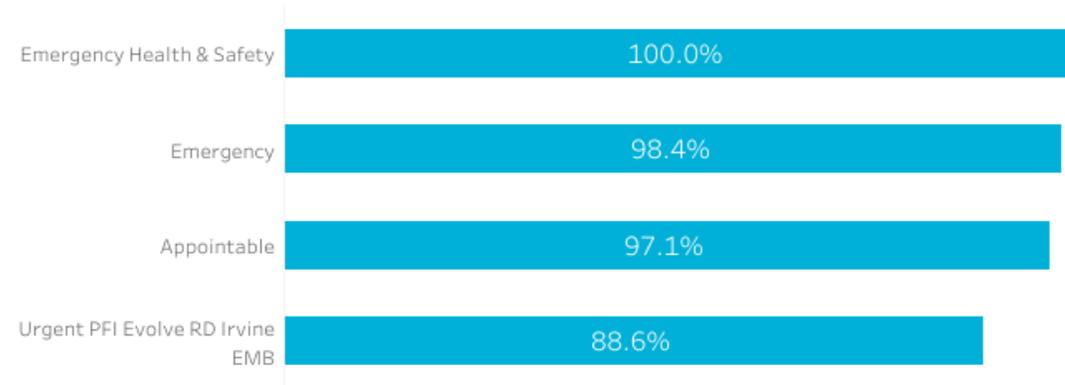
All Ended Tenancies



Repairs Completed in Time vs Volume of Repairs



Repairs Completed in Time by Priority

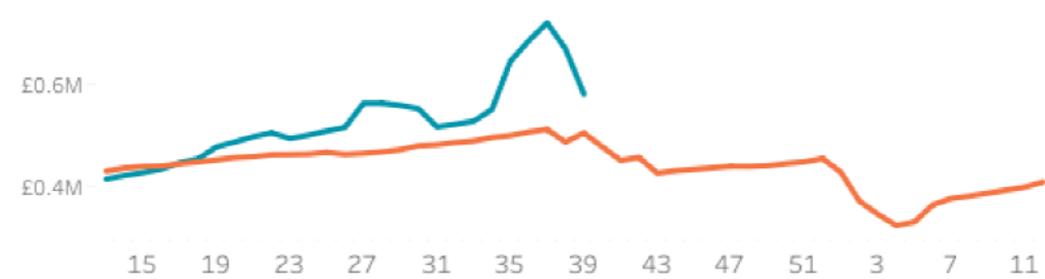




Currently Showing: **Irvine A**

Current Arrears  
**£0.58M**  
£10.75M (5.41%)

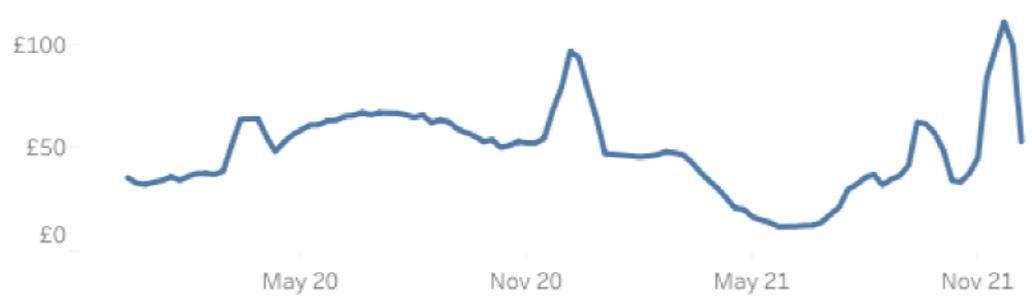
Arrears 4 Week Average **This Year** vs **Last Year**  
*The latest week is fixed at the centre of the chart*



Commentary

Year Movement Per Unit  
**+£53**  
Moved to Former: **£0.04M**

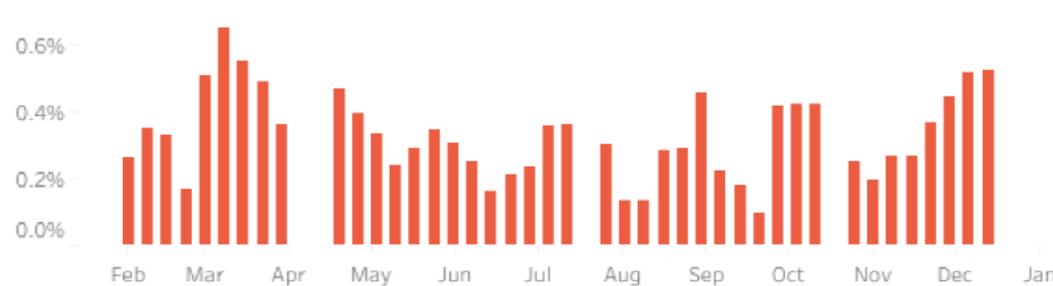
Yearly Movement Per Unit  
*(Arrears Per Unit - Arrears Per Unit 1 Year Ago) + Arrears Moved to Former in Year per Unit*



Commentary

Void Rent Loss  
**0.28%**  
£22,166 / £7.85M

Void Rent Loss Weekly  
*The Rent Loss for each individual week*



Commentary

# Customer Satisfaction P9 2021

Month	Overall Satisfaction	Listening to Views	Repairs and Maintenance	Responsive Repairs	Complaints Handling
Sep 2021	76.5%	52.6%	57.8%	76.8%	30.2%
Oct 2021	73.5%	49.7%	60.6%	77.0%	32.4%
Nov 2021	76.8%	55.2%	67.4%	80.3%	32.6%
Dec 2021	75.0%	57.6%	69.0%	69.2%	32.7%

9. Date of Next Meeting – Thursday 31  
March 2022 at 5.30 p.m.

247th Board Meeting held via MS Teams /  
44-46 Bank Street, Irvine, Ayrshire (TBC)