

PLANNED PREVENTATIVE MAINTENANCE POLICY

Planned Preventative Maintenance Policy

Responsible Officer	Group Director of Assets & Regeneration
This policy is applicable to	Karbon Group
Policy version	3
Date this version implemented	October 2026
Date of next review	October 2029

Policy Statement

This policy sets out the Karbon Homes Group's (the Group's) approach to developing a detailed planned preventative maintenance programme, ensuring homes remain safe, well maintained, energy efficient and compliant with statutory and regulatory standards.

Investment will be planned through rolling three-year, indicative five-year and 30-year programmes, informed by stock condition surveys, repairs intelligence, customer feedback, component lifecycles and robust cost data. Works will be prioritised on a risk-based, "worst-first" basis, with urgent health and safety hazards escalated promptly and regulatory compliance protected where budgets require reprioritisation.

Governance through the Planned Investment Forum, Asset Management and Development Panel and Group Development Committee supports effective oversight, value for money and continuous improvement in customer and asset outcomes.

Risk the policy is designed to control

1. Health & Safety - Risk of failure by the Group to take all reasonable health and safety measures leading to serious injury or loss of life.
5. Investment in Existing Homes – Failure to ensure existing homes are maintained at a decent standard
6. Governance & Compliance - Failure to comply with statutory and regulatory requirements and failure in the arrangements for managing the organisation at the highest level

Key performance measures

- Compliance with the Decent Homes Standard
- Ratio of responsive repairs spend to planned maintenance
- Customer satisfaction with planned maintenance
- Budget performance against business plan including any procurement savings to demonstrate value for money
- Customer Net Promotor Score, and complaints
- Tenant Satisfaction Measures:
 - **RP01** Proportion of homes that do not meet the Decent Homes Standard
 - **TP04** Satisfaction that the home is well maintained
 - **TP11** Satisfaction that the landlord makes a positive contribution to neighbourhoods

Definitions

The Group	Karbon Homes and all subsidiaries and associated companies.
SHAPE	A sustainability modelling tool
Cotality	Energy modelling software
PIMSS	Asset management data system
Awaab's Law	Awaab's Law was introduced in response to the tragic death of Awaab Ishak. The law aims to ensure that social landlords address significant hazards like damp and mould in a timely manner, enhancing customer safety and communications

Abbreviations

AMD	Asset Management and Development panel
BCIS	Building Cost Information Service
DHS	Decent Homes Standard
EPC	Energy Performance Certificate
GDC	Group Development Committee
HHSRS	Housing Health and Safety Rating System
KPS	Karbon Property Services
MEES	Minimum Energy Efficiency Standards
M&E	Mechanical and engineering
NPV	Net Present Value
PIF	Planned Investment Forum
PPM	Planned Preventative Maintenance.
RDSAP	Reduced Data Standard Assessment Procedure
SCS	Stock Condition Surveys
SoR	Schedule of Rates
TSMs	Tenant Satisfaction Measures
VAT	Value Added Tax

Policy Detail

1.0 Purpose of policy

- 6.1.1 This policy outlines the Planned Preventative Maintenance (PPM) approach adopted by the Group, ensuring alignment with relevant legislation, regulations, and best practice standards.
- 6.1.2 Its purpose is to define how the Group proactively invests in its housing stock to ensure customers live in well-maintained, good-quality homes and that they feel safe, supported and satisfied.
- 6.1.3 In developing detailed PPM programmes, the Group aims to balance property condition with customer needs and broader business priorities, whilst supporting the delivery of its strategic goals and objectives.

2.0 Objectives

- 2.1 The Group is committed to providing a high-quality service to customers. This policy recognises that a successful PPM service considers property condition, customers views, budgets and resources, statutory obligations and external factors when identifying and developing planned programmes.
- 2.2 The Group has a responsibility to protect its customers and the value of its housing stock and will maintain the whole of its portfolio to ensure that all customers live in homes that meet the Decent Homes Standard that are comfortable, energy efficient, safe, and secure.
- 2.3 The Group will budget for and carry out PPM in line with recommended lifecycles, subject to the condition of the component, and will plan for adequate financial provision to facilitate the implementation of this policy.
- 2.4 The key objectives of this policy are:
 - To outline the obligations and methods to develop programmes of planned maintenance works across the General Needs, Retirement Living (including Sheltered housing and Extra Care), Supported and other mixed tenure portfolios only.
 - To ensure planned maintenance programme activities protect customers and assets of the Group and that they are operated within a financial planning framework that adequately provides for the lifetime maintenance of the housing stock.
 - Commitment to maintaining, at a minimum, full compliance with all relevant external regulatory and statutory requirements. This includes, but is not limited to, annual reporting in accordance with the Decent Homes Standard and ensuring that all properties meet the requirements of the Homes (Fitness for Human Habitation) Act. Working to recognised best practices, where feasible, we will strive to exceed these minimum standards to deliver higher quality outcomes for customers.
 - To identify and undertake improvements to the energy efficiency of our homes in line with the governments clean growth strategy and Minimum Energy Efficiency Standards (MEES).
- 2.5 We will achieve these objectives by:
 - Developing and maintaining a rolling planned preventative maintenance programme.
 - Utilising specialist Asset Management software to hold comprehensive stock condition, energy efficiency and sustainability data to assist in efficient programming of planned works.
 - Adhering to methodology as implemented with the Decent Homes Standard, and any future revisions of this technical standard.

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- Undertaking regular stock condition surveys (SCS) to ensure the information held is accurate for planning future investment.
- Organise a Planned Investment Forum (PIF), which will include stakeholders from across the business to give strategic direction to investment planning and delivery. Providing regular updates to the Asset Management and Development panel (AMD) and Group Development Committee (GDC).
- Using data, insight and feedback in collaboration with internal teams including Housing Management and Karbon Property Services, which is discussed at monthly Planned Investment Forums (PIF).
- Analyse data held within the Sustainability Matrix (SHAPE).
- Coordinating satisfaction surveys and analysing the results.
- Using customer feedback to continually improve our services.
- Monitoring performance to ensure that we are meeting our investment targets and report this to internal and external customers.
- Researching new technology and products available on the market.
- Annual deep dives to Asset Management and Development Panel (AMD), Group Development Committee (GDC) and high-level reviews at Group Board.

3.0 Policy detail

3.1 Planned Preventative Maintenance

- 3.1.1 PPM is investment work that is scheduled in advance of component failures to avoid more expensive inefficient costs to repair, based on the anticipated lifecycle of property components. This proactive approach focuses on the timely replacement of both internal and external components within the boundaries of a dwelling, as well as shared or communal areas, once they reach the end of their useful economic life.
- 3.1.2 PPM is largely predictable based on SCS information, repairs data insight, industry-standard lifecycles (based on DHS) and benchmarked costs. This enables accurate forecasting and allocation of financial resources. PPM is developed in short, medium and a longer term, 30-year investment strategy, which supports the Group's overarching financial and business planning objectives.

3.2 Component Lifecycles

- 3.2.1 Each building component is assigned an indicative lifecycle, which serves as a planning tool to estimate when the component may reach the end of its useful economic life. The adopted life cycles align with DHS, as detailed in Figure 1, however they are only an estimate and may be amended due to the following:

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- Changes in relevant legislation relevant to planned maintenance or upgrading works implemented by Governing Bodies.
- Where the actual condition of a component deviates from the expected lifespan, either shorter or longer, due to factors such as premature failure or deterioration identified through Stock Condition Surveys. This may necessitate adjustments to the component's lifecycle, including early replacement or extension based on its assessed condition.
- To deliver the best possible customer experience and cost-effective procurement, works may be package up which may include replacing components before their expected lifecycle.
- Budget constraints may result in adjustments to the standard lifecycles to ensure spend profiles are met. The priority will continue to remain on maintaining regulatory compliance such as meeting the decent homes standard.

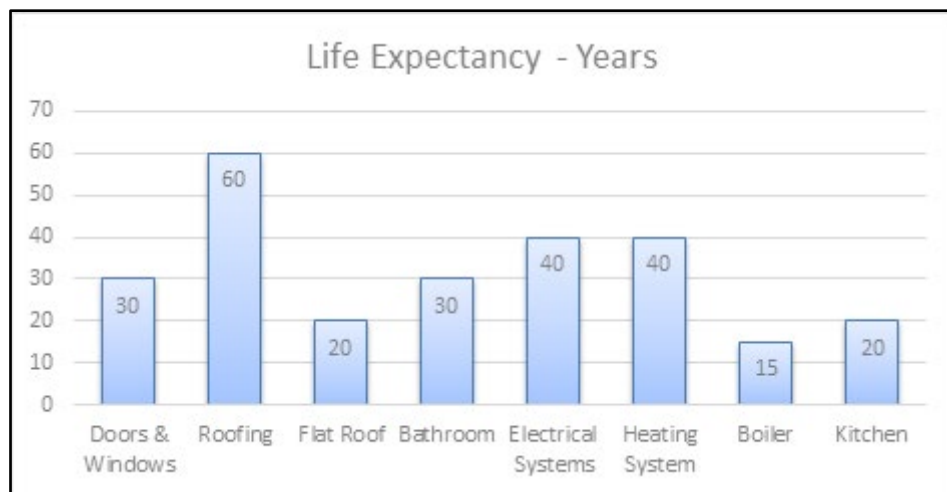


Figure 1

3.3 Schedule of Rates

- 3.3.1 Schedule of Rates (SoR) are used for PPM business planning to provide a standardised and transparent cost framework. Each fixed price SoR is tailored to suit specific assets, including allowance for materials, labour, and services, they serve as a financial forecasting tool for budget and business planning purposes, to accurately develop realistic short, medium and long term expenditure profiles.
- 3.3.2 The SoRs are detailed and broken down by component, material type, and asset archetypes. They exclude VAT and inflation which is applied by the Treasury team, in accordance with wider business plan assumptions.
- 3.3.3 SoRs are also utilised for conducting performance evaluations and Net Present Value (NPV) modelling.
- 3.3.4 Annual benchmarking of SoR's is carried out using a range of internal and external data sources:
- Planned investment delivery actual outturn costs.

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- BCIS Data
- Independent benchmarking via Savills and FFT.
- Shared SoR data from PIMSS, SHAPE and Cotality

3.3.5 The PIF will review outturn costs at each monthly meeting (with a quarterly deep dive) to assess the impact of actual market costs on the current investment plan and long-term business plan. This proactive monitoring will act as an early warning system by anticipating potential issues or emerging risks and facilitate informed and improved decision making, which can be escalated to AMD and Group Development Committee where required.

3.3.6 The most relevant rates from the datasets above are used with a record kept of what assumptions have been made and from where these costs were derived.

3.4 Maintaining Accurate Stock Information.

3.4.1 Investment decisions are driven by and dependent upon quality asset data. For decision making to be effective, the information must be detailed, accurate, recent, and reconciled.

3.4.2 The primary method of collecting asset information is via a programme of SCSs, carried out by a suitably qualified professional, at least once every five years. This means that a rolling SCS programme targets around 20% of the housing portfolio each year.

3.4.3 A prioritised approach is taken to SCSs based on urgency and risk to determine the frequency of inspection. Grading will be subject to regular review to ensure the programme is targeting the correct areas to maximise asset performance whilst accommodating any regulatory or business demands.

3.4.4 A hybrid surveying model has been developed. The patch based inhouse surveying team are supported by a third-party consultant. All surveys then go through a validation exercise, and a sample is audited by a third party on an annual basis, to ensure that the information is consistent and as accurate as possible.

3.4.5 All surveys are condition based on a visual inspection, and therefore a component may be recommended for replacement earlier or later than target lifecycles. This ensures that properties remain in a good and serviceable condition based on recent first-hand survey data rather than relying solely on installation dates.

3.4.6 During a SCS the following data is gathered as part of each whole house visual survey:

- A condition survey of all key components in the property, indicating when its next replacement is due in accordance with the Decent Homes Standard.
- A Housing Health and Safety Rating System (HHSRS) assessment to identify all category 1 & 2 hazards
- Collecting of energy data to support the Reduced Data Standard Assessment Procedure (RDSAP)
- Safeguarding customers. Raising safeguarding alerts or reporting if something is not right.

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- 3.4.7 These surveys confirm whether properties remain safe to live in, identify any high-risk hazards which require prompt remediation (HHSRS), and provide detailed energy performance information to supplement property energy performance information.
- 3.4.8 Any category 1 or 2 HHSRS risks are immediately logged and reported to the KPS damp & mould team for escalation in accordance with the Group's repair timescales and obligations under Awaab's Law.
- 3.4.9 To compliment these surveys, a programme of other periodic surveys are also undertaken to understand the condition of other components the Group are responsible for maintaining such as:
- Specialist M&E installations. Including lifts, commercial boilers, electric gates and any other specialist installations. This survey programme is also undertaken five yearly.
 - Bespoke surveys are required obtain data on out of curtilage areas that are owned by the Group, including unadopted land, retaining walls and other infrastructure.
 - Ad hoc condition surveys will be commissioned to other tenures within the portfolio (such as leasehold) to ensure that the properties meet regulatory standards and future costs are factored into the business plan.
- 3.4.10 Asset data also feeds into the sustainability modelling tool (SHAPE) and energy modelling software (Cotality) allowing a more strategic review of asset performance so that investment in energy efficient, sustainable homes is prioritised.
- 3.4.11 The combined survey data ensures that the business has the required information to fulfil its regulatory and statutory obligations, understand the condition of the stock base, as well as providing the core data for investment planning.

3.5 Access

- 3.5.1 Obtaining access to undertake surveys can sometimes be a challenge, as access cannot be enforced. We acknowledge they are vital, as such, we will make all reasonable endeavours to complete surveys to 100% of properties. Working with customers, flexible appointments will be offered, to agree a suitable time to undertake the surveys with a minimum of three access attempts, however, if access is not forthcoming, we will work with housing colleagues to explore alternative access routes.
- 3.5.2 It is important to ensure that we have obtained a statistically robust representative sample of surveys for each property archetype in each area. To ensure the accurate forecasting of appropriate investment both now and in the future.
- 3.5.3 Data on all homes which have been subject to a SCS no access will be shared with Housing Management each month and integrated in the Tenancy Visit Summary Dashboard, which consolidates data from all customer visits across the group. This

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ensures every customer has received a visit from a Group staff member within the past 12 months. Ensuring homes are safe, warm, free from and hazards generally in a good state of repair and they comply with all relevant legislation.

- 3.5.4 Where all access attempts to complete a SCS has been unsuccessful, data cloning will be applied based on a property of a similar architype and location as a last resort, this ensures costs are incorporated into the business plan for all properties. These properties will be identified on our system and prioritised in future surveying programmes and the access rates reported to AMD on a monthly basis.

3.6 Investment Strategy

- 3.6.1 The Group operates a structured investment planning cycle, comprising of:
- A detailed rolling three-year investment programme.
 - A five-year indicative investment programme.
 - A thirty-year indicative business plan forecast.
- 3.6.2 Each plan is reviewed and updated annually; this ensures that we maintain a rolling investment plan within the agreed financial parameters whilst being assured that the immediate investment requirements of the property portfolio are accommodated with a high degree of reliability.
- 3.6.3 All plans are based on up-to-date Schedules of Rates, SCS data and known future investment requirements, including compliance with emerging legislative standards such as DHS, EPC C targets. Net zero carbon costs are incorporated into the plan for stress testing purposes only at this stage.
- 3.6.4 Investment programmes follow a 'worst-first' prioritisation model, targeting components in the poorest condition (in accordance with DHS) combined with geographic grouping of component renewals. This strategy enables cost efficiencies and enhances customer experience by coordinating works such as windows, roofs, and external wall insulation. A fabric-first approach is prioritised where applicable. As such non-critical works may be deferred to support this strategy in accordance with budget parameters.
- 3.6.5 Component conditions are continuously reassessed through SCS data. Where components are found to be in good condition, replacement may be deferred. All decisions will maintain compliance with the DHS, uphold customer satisfaction, and ensure asset performance is not compromised.
- 3.6.6 The rolling three-year investment programme is submitted annually to the PIF, AMD and GDC for approval following a critical path.
- 3.6.7 Information on completed works are updated on specialist the Asset Management System. Any other dependant system will also be updated to reflect any component changes, which will be captured within Component Change and Property Data Reconciliation procedures, in line with their protocol requirements.

3.7 Planned Works Identification

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- 3.7.1 A rolling 3-year planned investment programme will be developed and issued to increase the lead in time for delivery teams, giving the ability to procure larger packages of work, establish long term contracts to achieve best value for money, as well as improving customer experience with early engagement with all stakeholders.
- 3.7.2 Planned maintenance works will be identified based on desktop reviews and site-specific surveys. A series of judgements will be made in line with the following criteria:
- Lifecycle and condition of components, including information recorded when components were last replaced and when they require renewal.
 - Repairs and maintenance data, patterns, and intelligence.
 - Annual servicing data to determine the condition of heating systems.
 - Changes to any legislative and safety requirements.
 - Patterns in customer and key stakeholder views, TSM feedback, and complaints.
 - Impact on the Business Plan and the organisation's wider strategic aims and objectives.
 - Items raised via PIF and Highlighted Works Schedule
- 3.7.3 A critical path sets out the process of developing the 3-year investment plan as it is scrutinised and finessed by key stakeholders in PIF, to ensure that the immediate investment requirements of the property portfolio are accommodated.

4.0 Customer Vulnerabilities

- 4.1 This policy is applied in line with our Customers in Vulnerable Circumstances Policy. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services.
- 4.2 We will support people in vulnerable circumstances to help us deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people in vulnerable circumstances and to ensure we meet our statutory and regulatory requirements as a social landlord.
- 4.3 Policies and key information are made available on our websites.

5.0 Monitoring and Review

- 5.1 This policy will be reviewed at least every 3-years. The review will be brought forward if needed due to changes in legislation or regulatory requirements.
- 5.2 Group Director of Assets & Regeneration is responsible for the monitoring and review of this policy.

6.0 Equality and Diversity

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- 6.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 6.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 6.3 If you would like this or any other policies in a different language or format please contact inclusion@karbonhomes.co.uk.

7.0 Data Protection and Privacy

- 7.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.

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Appendix A – SCS Prioritisation

- Prioritising stock condition surveys is crucial for effective asset management. The stock will be graded into the following categories.
- Grading will be subject to regular review to ensure the programme is targeting the correct areas which will include frequent reviews of the prioritisation strategy to ensure optimal asset performance throughout the 5-year cycle whilst accommodating any regulatory or business demands (DHS2, Awaabs Law etc.).

Grade	Description
1	Areas with high SCS no access rates from previous programmes.
2	Properties in areas which have the highest volumes of damp and mould or other HHSRS failures.
3	Properties in areas with high repairs volumes, widespread defects or high value unplanned works are identified (where existing data requires updating)
4	Data driven, targeting areas with poor data confidence.
5	The remaining properties will be profiled to survey before the fifth year for long-term investment planning.

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Appendix B – Investment Plan Critical Path

TASK	TEAM	LEAD	PROGRESS	Start Date	Target Date	Days	STATUS
Initial Programme Development			83%			184.00	In Progress
Confirm budget against business plan and deferred works from current programme	Asset/KPS	Craig Lonsdale / Steve Colby	100%	01/07/2025	31/07/2025	23.00	Complete
Asset Management System Interrogation	Asset	Craig Lonsdale	100%	01/08/2025	15/08/2025	11.00	
Review Highlighted Works List	Asset	Craig Lonsdale / Janine Hunter	100%	15/08/2025	01/09/2025	12.00	
Scoping session with assets and investment	Asset/KPS	Craig Lonsdale / Steve Colby	100%	03/09/2025	03/09/2025	1.00	
PIF approval of SoR's for programme development	Assets/KPS	Craig Lonsdale / Justine Platt	100%	01/09/2025	01/10/2025	23.00	
Initial Programme Development	Asset	Craig Lonsdale	100%	15/09/2025	15/10/2025	23.00	
Sustainability Matrix Review	Asset	Craig Lonsdale	50%	15/09/2025	15/10/2025	23.00	
GIS Overlay	Asset	Jonathan Douglas	50%	15/10/2025	01/11/2025	13.00	
Programme Review	Asset	Tony Ruddick / Craig Lonsdale	50%	01/11/2025	15/11/2025	10.00	
Pre-Investment Site Surveys	Asset	Stephen Donaghy	75%	15/08/2025	01/10/2025	34.00	
Share High Level Numbers and Budgets with Investment	Asset/KPS	Craig Lonsdale / Steve Colby	100%	01/10/2025	15/10/2025	11.00	
Proposed Investment Plan Review			0%			41.00	
Issue Proposal Internally to KPS Investment for Review	Asset	Craig Lonsdale	0%	01/12/2025	07/12/2025	5.00	
Issue draft for PIF consultation	PIF	Craig Lonsdale	0%	07/12/2025	23/12/2025	12.00	
Review Programme Against Cyclical Works	KPS	Steve Colby	0%	01/12/2025	07/12/2025	5.00	
Review Programme Against Building Safety Works	KPS	KPS	0%	01/12/2025	07/12/2025	5.00	
RAM Review of Component Replacements	Finance	Jeni Atkins	0%	01/12/2025	07/12/2025	5.00	
PIF Review Cut off	PIF	Tony Ruddick	0%	07/01/2026	07/01/2026	1.00	
Feedback Reviewed & Amendments Made	Asset	Tony Ruddick / Craig Lonsdale	0%	07/01/2026	14/01/2026	6.00	
PIF - Final Sign Off	PIF	Tony Ruddick	0%	14/01/2026	14/01/2026	1.00	
AMD - Approval	Asset	Craig Lonsdale	0%	01/02/2026	28/02/2026	1.00	
Final Programme Issued - Handed over to PIF for management	Asset	Tony Ruddick	0%	28/02/2026	28/02/2026	0.00	Not Started
RTB Review	Asset	Asset Data & Compliance	0%	Ongoing	Ongoing		
Develop Promotional Material	C&M	TBC	0%	28/02/2026	01/04/2026	23.00	
Asbestos Data - Issue	Asset	Asset Data & Compliance	0%	Ongoing	Ongoing		
Asbestos Data - Review	KPS	Steve Colby	0%	Ongoing	Ongoing		

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Approved by	KLT in 2025 – records not kept for original July 2021 approval
Date approved	October 2025
Frequency of review	Every 3 years, or more frequently where there are changes to relevant legislation, regulation, or best practice
Last reviewed by	Group Director Assets and Regeneration
Date of last review	October 2026
Key related documents (policy, procedure, customer literature)	Decent Homes Standard Awaab's Law Repairs & Maintenance Policy Repairs & Maintenance Procedure guide Rechargeable Repairs Policy Compliance Policies Complaints, Compliments and Suggestions Policy Value for Money Strategy Asset Management Strategic Plan Karbon Homes Tenants' Handbook A Decent Home: Definition and guidance for implementation June 2006 Housing health and safety rating system (HHSRS): guidance for landlords and property-related professionals
Sources of best practice or guidance used in developing this policy	• Regulatory Standards – Reference to repairs and maintenance can be found within the standards, especially within both the Home, plus Tenant Involvement and Empowerment Standards. We comply with all required outcomes, specific expectations, and all other regulatory requirements. • Landlord & Tenant Act 1985 • Housing Act 2004 • Secure Tenants of Local Housing Authorities (Right to Repair) Regulations 1994 • Defective Premises Act 1972 • Commonhold & Leasehold Reform Act 2002 • Gas Safety (Installation and Use) Regulations 1998 • Management of Health and Safety at Work Regulations 1999 • Building Regulations Act 1984 • Health and Safety at Work Act 1974 • Housing Health and Safety Rating System 2006

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	- Equality Act 2010 - The Regulatory Framework for Social Housing in England. - A Decent Home: Definition and guidance for implementation June 2006 - The Clean Growth Strategy - Awaab's Law - Minimum Energy Efficiency Standards
Author of this policy version	Governance & Risk Coordinator

Document change history		
Version	Date	Changed sections
1	July 2021	New policy
2	October 2025	Not recorded
3	September 2026	Update to new policy template, housekeeping of wording for clarity, Karbon Homes to 'The Group', Risk updated, removed reference to Knowing Our Homes Policy

Equality Impact Assessment	
Include below the dates/outcomes from most recent EIA	
Equality Impact Assessment (EQIA)	EQIA Date:

Consultation		
Consultation Group	Needs to be consulted when ...	Date of Consultation
Colleague Forum	Where a new policy or major policy change affects colleagues	Approved by PIF on 27 th August 2025
Unions	Where a new policy or major policy change affects colleagues	Not applicable
Customers (including customers of subsidiaries)	Where a new policy or major policy change affects customers	Not applicable
54North colleagues	To agree any wording needed in the policy to reflect differences in 54North structure and processes	September 2026
Inclusion and Belonging	An updated EQIA must be completed every time there is a new version of the policy	No record
Data Protection	The Data Protection team must be consulted every time there is a new version of the policy as an updated DPIA may be required.	No record
Legal	For all new policies or major policy changes to consider if there are any	No record

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	legal implications and check if a legal review or advice is required	
Corporate Health and Safety Group	For health and safety policies	Not applicable
KLT	Approves minor changes. (Circulate to KLT major policy changes/ new policies for awareness and any feedback)	October 2025
Exec Team	Approves major changes to non-key policies. (Circulate to Exec major policy changes/ new policies for awareness and any feedback)	Records from 2021 not kept, no major changes since
Board Committees	Scrutinise new key policies or major changes to key policies in their areas. Approve specific key policies outlined in Group Delegatory Framework.	n/a
Subsidiary boards	Review and agree adoption of any new policies/major key policy changes going to Group Board	n/a
Group Board	Approve new key policies and major changes to key policies	n/a