**Appendix 2**

**April 2025 - Sanctuary Scotland Housing Association Limited**

**Mapping Exercise for Assurance Statement – Complying with and submitting information in accordance with Guidance**

The purpose of this document is to provide the Board of Management of Sanctuary Scotland Housing Association Limited with assurance that the organisation complies with the requirements of Chapter Three of the Regulation of Social Housing in Scotland in relation to compliance with guidance and submission of information. The compliance requirements are defined, the evidence and practice to support compliance is described and additional information or further action defined.

| SHR Regulatory Requirement and evidence | Compliant? | Action required/commentary |
|---|---|---|
| **Requirement**<br>**Comply with, and submit information to us (SHR) in accordance with, our guidance on notifiable events (NE)**<br>Evidence<br>The guidance is understood<br>Required notifications are being made<br>Events to be notified are reported to Board of Management<br>Event arising have been highlighted to Board of Management members in between meetings as appropriate and updates provided as matters progress<br>Notifiable events register maintained and submitted to Board of Management | **YES** | |
| **Requirement**<br>**Comply with, and submit information to us (SHR) in accordance with our guidance on group structures**<br>**(This only applies to RSLs which are members of a group structure)**<br>Evidence that the group structure is being operated in accordance with the guidance requirements and that the relationship between the subsidiary and its parent is well defined | **YES** | Please note that this guidance also covers notifications required if setting up a group structure, registration of new RSL's and if joining a group structure – this part is therefore not relevant<br><br>The assessment of compliance is made in relation to the aspects of the guidance relating to operating a group structure. |

| **SHR Regulatory Requirement and evidence** | **Compliant?** | **Action required/commentary** |
|---|---|---|
| The Rules of Sanctuary Scotland Housing Association Limited<br>Inter company agreement<br>Procedure agreement<br>Standing Orders<br>Financial Regulations<br>Schedule of covenants<br>Financial projections and budgets<br>Governance Manual contains key documents that are relevant to all boards within the Sanctuary group structure ensuring a uniform standard of expectation of board members e.g. Code of conduct, declaration of interest, policy on entitlements payment and benefits, whistleblowing policy<br><br>Reports are provided to Board of Management to give assurance that group functions are operating effectively e.g. Health and Safety, Development, Asset Management<br><br>During the transfer of engagements process the updated rules and other key documents such as the inter company agreements were scrutinised by external legal advisors and also approved by the SHR<br><br>The procedure agreements are reviewed annually with the Chairperson and the Director to monitor compliance<br><br>The Group Audit and Risk function gives assurance on the management of risk within the group and the audit functions ensuring good practice and delivery of services in accordance with legal requirements and good practice | | |

| SHR Regulatory<br>Requirement and evidence | Compliant? | Action required/commentary |
|---|---|---|
| Intra Group loan facilities and arrangements approved by Sanctuary Scotland board of management or a sub committee appointed by them e.g. revolving credit facilities<br><br>Group board minutes are provided to Sanctuary Scotland board<br><br>The activity of our subsidiary, Sanctuary Homes Scotland Limited, is closely monitored and reported on. Common risk maps are used to recognise key concerns and ensure the activity does not represent a risk to the parent organisation.<br><br>Standard approach to annual board appraisals across the Group<br><br>The Group Business plan applies to all aspects of the group and from this the Sanctuary Scotland operations plan flows | | |
| Comply with, and submit information to us (SHR) in accordance with, our guidance on <u>consulting tenants where tenant consent is required</u><br>*This applies only where a RSL is intending to either: dispose of tenanted properties by sale or transfer; or become a subsidiary of another organisation; or is intending to convert from being a company to become a registered society; or is likely to be restructured as a result of the actions of creditors; or intends to be dissolved or wound up voluntarily*<br>**Transfer of engagements in 2016 and then the Thistle transfer in 2021 evidence compliance in this respect.** | **N/A** | |
| **<u>Requirement</u>**<br>**Comply with, and submit information to us (SHR)** | **YES** | |

| SHR Regulatory<br>Requirement and evidence | Compliant? | Action required/commentary |
|---|---|---|
| **in accordance with, our guidance on <u>financial viability of RSLs: information requirements</u>**<br><u>Evidence</u><br>Five Year Financial Projections (FYFP)<br>Audited accounts<br>Auditor’s Management Letter<br>Board of Management reports and response to auditor<br>Audited financial statement return<br>Loan Portfolio Return<br>Fulfilling requirements of Engagement Plan | | |
| **<u>Requirement</u>**<br>**Comply with, and submit information to us (SHR) in accordance with, our guidance on determination of accounting requirements**<br><u>Evidence</u><br>Financial statements<br>Audited accounts<br>Auditor’s management letter<br>Board of Management reports<br>Minutes of Board of Management and Group Risk and Audit Committee meetings | **YES** | |
| **<u>Requirement</u>**<br>**Comply with, and submit information to us (SHR) in accordance with, our guidance on <u>preparation of financial statements.</u>**<br><u>Evidence</u><br>Financial Statement<br>Report to Board of Management<br>Minutes of Board of Management<br>The submission made to the SHR | **YES** | |