THE CCH ACCREDITATION FRAMEWORK FOR HOUSING CO-OPERATIVES

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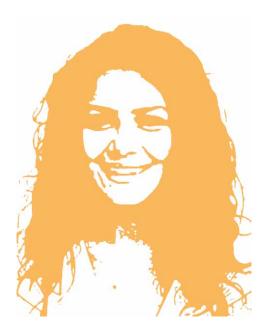
INTRODUCTION

The Confederation of Co-operative Housing (CCH) has simplified its accreditation process to reflect feedback from its members, and changes to the regulation of social housing. There are various reasons why a housing co-op should become accredited:

- to use the framework to improve its democracy, governance, management and services
- to gain the credibility that goes with being formally accredited, particularly if the co-op is seeking development finance
- if the co-op is registered with the Homes and Communities Agency (HCA), to use the framework to comply with the Regulatory Standards

We know that housing co-ops come in many shapes and sizes; they are in different locations; they own different types of homes; they house different groups of people; they vary from the very small (in some cases just one house with several tenants) through to co-ops with nearly 500 properties; they have different "Governing Body" arrangements (some governed by general meeting; some by management committees; some are fully mutual; some are non-mutual); they deliver services in different ways (some through the voluntary input of members some through directly employed staff some through external service providers and permutations of all three).

There is no right and wrong way that a co-op should do any of the above. Therefore, this accreditation system is not about prescribing in detail how things should be done. It is about looking at how a co-op has considered the issues it needs to consider; how it has made informed and democratic decisions that deliver the best solutions for governing the co-op and delivering services; and what positive results have come from the decisions made.



THE ACCREDITATION PROCESS

THE ACCREDITATION PROCESS IS IN THREE STAGES

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ACCREDITATION STAGES	DESCRIPTION
STAGE 01 REGISTRATION	A housing co-op will choose to seek accreditation and will register on the accreditation register at: accreditation@cch.coop
STAGE 02 SELF ASSESMENT	The co—op will undertake a self-assessment against the accreditation framework and agree an action plan to address any areas where it needs to take action. CCH can meet with Governing Body members to assist in the self assessment process.
STAGE 03 ACCREDITATION	(A) WORKING TOWARDS ACCREDITATION – this initial status will be awarded to all housing co-ops that have undertaken their self assessment, scored at least 2 for each element and have an action plan in place to achieve Full Accreditation
	(B) FULL ACCREDITATION - will be granted following an independent external validation which will assess evidence that the co-op operates as a well managed co-op, run democratically and effectively by and for its members. To be formally accredited, the co-op will need to have achieved the necessary standards in all areas of the framework. A part of this stage is a formal meeting with the Governing Body.

It should be particularly noted that it will be the Governing Body that needs to choose whether to register and carry out the self-assessment. Staff may assist the Governing Body make decisions and consider the framework, but the buck stops with the Governing Body and it is their decision-making that will be assessed. Making sure that co-ops are run well and provide good services for their members is an ongoing task. The Accreditation framework should be viewed as a long term process where the co-op considers and addresses parts of the framework over a period of time rather than all in one go.

GUIDANCE FOR HOUSING CO-OPERATIVES

THE FRAMEWORK

This guidance has been designed to enable housing co-ops to undertake their self assessments using the 'Housing Co-operative Workbook'. Throughout this guidance we refer to members; for non-mutual co-ops this term should be taken to refer to members and non-member tenants.

FRAMEWORK ELEMENT

01. CO-OP VALUES &

02. GOVERNANCE &

Code of Governance

viable

co-op operating in line with the CCH / NHF

2012 and is it financially

VIABILITY - Is the

PRINCIPLES – what is the co-op about and how does it interact with its membership

FRAMEWORK DETAIL

- A) Does the co-op have a clear mission and vision that members were involved in shaping?
- B) Is the co-op aware of current good practice from across the housing co-op sector?
- C) Has an equality and diversity policy been agreed that ensures fair outcomes across the co-op?
- D) Does the co-op provide members with the information they need?
- E) Does the co-op properly deal with conflicts of interest?
- F) Does the co-op have a succession plan, understand the effect of demographic change and provide training to its members?
- A) Does the co-op annually assess itself against the CCH / NHF Code of Governance 2012?
- B) Does the co-op have appropriate long term plans in place that ensure its long term viability?
- C) Do members of the governing body have the information they need to make informed decisions?
- D) Is the co-op keeping all the legal, statutory and regulatory records that it needs to?
- E) Is everyone clear about what their roles and responsibilities are?
- F) Does the co-op effectively involve its members?
- G) Are meetings properly conducted?
- H) Are there appropriate support structures and arrangements for contract management?
- Is an annual budget approved and is it and cashflows monitored?
- J) Does the co-op have an appropriate set of Financial Standing Orders?
- K) Is there a clear member Expenses Policy?
- L) Is the co-op complying with its regulatory and legal accounting duties and any loan covenants?

FRAMEWORK ELEMENT

01. SERVICES -

are members and prospective members getting good services?

FRAMEWORK DETAIL

- A) Are there targets agreed for all services and is performance reviewed against them?
- B) Does the co-op allocate its homes in a fair, open and transparent way?
- C) Does the co-op issue an appropriate tenancy agreement and does it explain it to new members?
- D) Does the co-op have an agreed lettable standard and effective void management procedure?
- E) Does the co-op deliver a high quality repairs service that fits in with what members want and its legal requirements?
- F) Does the co-op have appropriate Rent Setting and Arrears Policies?
- G) Does the co-op have an appropriate policy for tackling and preventing anti-social behaviour?
- H) Does the co-op have an appropriate Management Complaints Policy?
- Are policies in place to deal with other tenancy matters?



UNDERTAKING THE SELF ASSESSMENT

Initially we would advise members of the Governing Body to complete the self assessment individually and then meet up and share the results – this could be done at an away day or in a meeting. The Governing Body may wish to get a view from other members or staff members or the service agency it employs as to how they would score the co-op in some or all framework elements and details.

The Governing Body needs to meet to discuss the information gathered and the reasons for differences of opinion constructively with an aim of reaching a consensus on scoring. Scores for each element should be entered into the yellow boxes; there are 28 elements.

In order to undertake the Self Assessment each of the framework elements needs to be scored between 1 and 4 as below (a score of 3 is the necessary accreditation standard):

- The co-op doesn't comply with the framework detail
- 2 The co-op partially complies with the framework detail
- 3 The co-op fully complies with the framework detail
- The co-op is better than the framework detail

After completing the Self Assessment the Governing Body should develop an action plan that focuses in particular on addressing those framework details where scores of 1 or 2 were agreed.



THE FRAMEWORK ELEMENTS & DETAILS

Below we have set out some guidance on what we mean by the framework elements and details. At the beginning of each section, we have provided guidance as to relevant documentation, procedures, policies and strategies (shown in blue) that you may find of relevance to particular framework elements and details.

1. CO-OP VALUES & PRINCIPLES

Documentation applicable to this section: Mission statement and statement of values and vision Co-operative Rules The Co-operative values and principles Equality & Diversity Policy Member Involvement Policy Member Handbook Conflict of Interest Policy Succession Plan Training Plan

A) DOES THE CO-OP HAVE A CLEAR MISSION AND VISION THAT MEMBERS WERE INVOLVED IN SHAPING?

Any organisation needs to have a clear idea of what it's there for – what it's trying to achieve – and what are the main things it believes in. These things are usually set out in written "mission statements" and statements of values and vision. Members should understand and be able to participate in developing the mission, values and vision. A key factor behind all forms of co-operatives is that there are a set of internationally defined co-operative values & principles that lie at the heart of what a co-op is.

B) IS THE CO-OP AWARE OF CURRENT GOOD PRACTICE FROM ACROSS THE HOUSING CO-OP SECTOR?

There is a great deal that co-ops can learn by sharing skills, knowledge and experience and supporting each other. Co-ops should consider how they are working with and networking with other co-ops across the country and also whether they could be drawing on good practice from other co-ops and the broader social housing sector.

C) HAS AN EQUALITY AND DIVERSITY POLICY BEEN AGREED THAT ENSURES FAIR OUTCOMES ACROSS THE CO-OP?

Where a co-op works really well, it brings together people from a wide range of diverse backgrounds and, because of the need to work together in a community, helps them to share and learn and grow from their cross section of beliefs. But for that to happen, the co-op needs to have in place an "equal opportunities and diversity" framework that ensures fair outcomes in allocations, service provision, staff and agency appointment and, most importantly, in how members can be involved.

A successful housing co-op has positive formal and informal social interaction between members, and enables all members to share, interact and achieve consensus from different ideas and viewpoints in the community. A dysfunctional housing co-op is marked by domination by cliques, regular uncontrollable conflict (factions plotting and scheming against each other) and particular groups of members who are disenchanted with and have given up on the co-op's democratic processes. The co-op's Chair needs to ensure that all our members can play an active role and must maintain control of our meetings within the bounds of our Code of Conduct and Standing Orders.

D) DOES THE CO-OP PROVIDE MEMBERS WITH THE INFORMATION THEY NEED?

Members need information to enable them to play as active a role in the co-op as they can. Whether this is information for new members about how they can get involved in the co-op or that enables them to effectively scrutinise performance, information is critical to the co-op being an open, transparent and democratic organisation.

E) DOES THE CO-OP PROPERLY DEAL WITH CONFLICTS OF INTEREST?

Co-ops should have a system for dealing with conflicts of interest to ensure that members' personal interests do not influence decision-making and have systems of checks and balances to ensure that co-op members cannot defraud the co-op or personally benefit from their involvement in the co-op.

F) DOES THE CO-OP HAVE A SUCCESSION PLAN, UNDERSTAND THE EFFECT OF DEMOGRAPHIC CHANGE AND PROVIDE TRAINING TO ITS MEMBERS?

Co-ops must prepare themselves to renew and replace the active members before they stop being active and be aware that as members grow older their needs and circumstances change. Coops should make available training to all members to ensure future sustainability and plan for changing demographics within their membership.



2 GOVERNANCE & VIABILITY

Documentation applicable to this section: CCH / NHF Code of Governance for Housing Co-operatives 2012 Business Plan, Risk Management Strategy, Asset Management Plan & Reserves Plan Code of Conduct Confidentiality Policy Staff Contracts and Handbook Service Agency Management Agreement Financial Standing Orders Expenses Policy

Co-ops have different governing body arrangements. Whilst housing co-ops are legally defined as membership organisations, where members are legally entitled to have their say and cast votes at co-op General Meetings of the co-op, all housing co-ops have a legally defined governing body which is legally responsible for making decisions in the co-op. In some (usually smaller ones) the governing body is the General Meeting; in others, the co-op elects a Management Committee as their governing body to direct management on behalf of their members.

A) DOES THE CO-OP ANNUALLY ASSESS ITSELF AGAINST THE CCH / NHF CODE OF GOVERNANCE 2012?

The Confederation of Co-operative Housing and the National Housing Federation have updated the Code of Governance for Housing Co-operatives in 2012 . All housing co-ops should assess themselves against this Code and produce a statement of compliance that explains any areas where they have an alternative approach to one of the key principles.

B) DOES THE CO-OP HAVE APPROPRIATE LONG TERM PLAN IN PLACE THAT ENSURES ITS LONG TERM VIABILITY?

Business Plan

Co-ops needs a long term plan that sets out where they are going; how they are delivering services and what money and resources are needed to keep the co-op going.

Reserves Plan

Members should think about how to maximise interest from the co-op's reserves and, given that most co-ops were developed initially using public money, it is right and proper that co-ops should plan how they might use their surplus financial and other assets to provide more homes.

Asset Management Plan

Co-ops should make sure that all homes are warm, weatherproof and have modern facilities by planning to replace all elements of the home on a regular basis. This plan is referred to as asset management and needs to be based on regular stock condition surveys by qualified people who can inform the co-op if there is particular work that needs doing to keep our homes in good condition and up to date.

Members should be involved in developing the planned maintenance service. It's often the case that members will have the best knowledge of what needs replacing and how it should be replaced. This means that members should be supported to get involved in the design and implementation of contracts to carry out major works, planned and cyclical maintenance contracts, and be involved in recruitment of contractors and they should be kept informed of the progress of major works programmes being carried out on their homes.

Risk Management Strategy

In a world where all sorts of things can happen, co-ops need to ensure that they plan to protect themselves. Risks could be related to service delivery, governance, staff and service agencies, the law or the outside world. Co-ops need to have plans in place to identify and manage these risks and for recovering from disasters to ensure the operations of the co-op are able to continue.

Insurance

Some of the risks co-ops face should be dealt with by having up to date insurance cover for particular liabilities, including buildings insurance, insurance against loss of or damage to co-operative property, public liability insurance and employer liability insurance (for any staff members). These insurance policies need to be reviewed annually, and there should be procedures to handle any insurance claims.

C) DO MEMBERS OF THE GOVERNING BODY HAVE THE INFORMATION THEY NEED TO MAKE INFORMED DECISIONS?

Members on the Governing Body can't make good decisions or monitor performance unless they have comprehensive information on what they are making decisions about. Wherever possible, those making decisions need to get this information in advance so that they can think things through.

D) IS THE CO-OP KEEPING ALL THE LEGAL, STATUTORY AND REGULATORY RECORDS THAT IT NEEDS TO?

Any organisation needs to keep good quality records on a whole range of issues.

Specific documentation that a co-op should keep includes:

- minutes of all meetings
- detailed tenancy files for all members
- staff or service agency contracts and management agreements and supporting files
- a full set of policies and procedures that set out how the co-op operates
- if they are a Registered Provider, regulatory returns and all other documents as required by the Regulatory Standards

E) IS EVERYONE CLEAR ABOUT WHAT THEIR ROLES AND RESPONSIBILITIES ARE?

Clarity of roles and responsibilities is of vital importance. There needs to be clarity about what is delegated to committees, officers, staff and service agencies – people and groups need to know what decisions they can and can't take, what is expected of them and how they should report back to the governing body.

F) DOES THE CO-OP EFFECTIVELY INVOLVE ITS MEMBERS?

Co-ops should consider whether the people who come to meetings, who are on the Governing Body or who participate in the co-op's life in some other way, are broadly representative of the co-op's full membership. Co-ops often tend to go through cycles of active membership, and the Governing Body should regularly review how successful it is in encouraging members to participate in general, committee and / or working group meetings.

Co-ops should have different ways that members can contribute that go beyond formal meetings, perhaps on working groups for particular areas that people might be interested in or through social media. Whilst how the co-op functions as a community is vitally important, co-ops should not forget that co-op members are individuals as well, with individual tenant rights, needs and aspirations. So co-ops should be doing whatever is necessary to periodically find out the individual views of members and decision-making should be informed by those views.

What co-ops do to support new members participate is vitally important. For some co-ops, new members participate before they are housed by the co-op and that can be a particularly effective way to introduce new members to activities. However for many co-ops, people become new members as they are housed. Does the co-op actively consider how effective it is inducting new members? Does it clearly outline how the co-op works to new members and encourage them to become involved?

G) ARE MEETINGS PROPERLY CONDUCTED?

How a co-op's general and committee meetings operate and how well they are chaired can determine how effective a co-op is. A co-op's Rules will contain some legal requirements of meetings, such as sending out notices and agendas of meetings in advance, the requirement for minutes to be kept and stored at the co-op's registered office and quorums for meetings. These are the basic minimum of what our co-op should be doing to ensure effective meetings. A Code of Conduct that governs the behaviour of members in meetings would help to make it clear what is expected of members

H) ARE THERE APPROPRIATE SUPPORT STRUCTURES AND ARRANGEMENTS FOR CONTRACT MANAGEMENT?

In very small co-ops, members do everything that needs to be done but most co-ops choose to either employ staff or a service provider to carry out some or all of the day to day functions. The relationship with staff or service providers is often a key part of our coop's structures and operations, not least because co-ops sometimes rely on the information and guidance they provide. So it is critical that a co-op is confident that staff and service agencies have the right skills, knowledge and experience and that the right relationships with them are in place. These relationships should always be set out clearly in writing and regularly reviewed and the performance of people or organisations working for the co-op should be regularly reviewed.

For co-ops that employ staff members the relationship should be formalised through contracts and job descriptions. These co-ops should ensure that they have appropriate policies and procedures for recruitment, training and development, disciplinary and grievances, meeting their legal responsibilities and for training their members in staff recruitment and management. For co-ops that employ service agencies the relationship should be formalised through a Management / Service Level Agreement.

I) IS AN ANNUAL BUDGET APPROVED AND IS IT AND CASHFLOWS MONITORED?

An annual budget should be set before the start of each financial year and all members should have the opportunity to have their say on it. The co-op should periodically review actual performance against it. The co-op needs to have regular finance reports, budget reviews and cash flow reports, although how this is done and the frequency of particular finance reports should be dependent on the level of risks the co-op faces.

J) DOES THE CO-OP HAVE AN APPROPRIATE SET OF FINANCIAL STANDING ORDERS?

Co-ops must have effective Financial Standing Orders, reporting and monitoring systems and procedures for making orders and authorising payments. They should also have in place proper processes to ensure that value for money is obtained, particularly for large items of spend such as major repairs.

K) IS THERE A CLEAR MEMBER EXPENSES POLICY?

There should be an Expenses Policy in place that clearly sets out what active members can claim for from the co-op in carrying out the co-op's business. No co-op member should be out of pocket for carrying out co-op business. The key to this is clarity over what can be claimed for, and ensuring that the Expenses Policy is properly followed.

L) IS THE CO-OP COMPLYING WITH ITS REGULATORY AND LEGAL ACCOUNTING DUTIES AND ANY LOAN COVENANTS?

There are a number of legal requirements that co-ops have to comply with, not least the requirements those outlined in the co-op's Rules, such as having an annual audit and ensuring that accounts are approved within set deadlines and submitting the Annual Returns.

Co-ops also have to comply with any requirements that are conditions of agreements made with organisations that lent them money.

The key thing about the co-op's legal and regulatory requirements is that governing body members should be aware of them and have access to advice and support as necessary to ensure that the co-op complies with them.

3 SERVICES

Documentation applicable to this section: Performance Plan Allocations and Lettings Policy Tenancy Agreement Voids Procedure Repairs & Maintenance Policy Rent Setting and Arrears Policies Anti-Social Behaviour Policy Complaints Policy Breach of Tenancy Policy

A) ARE THERE TARGETS AGREED FOR ALL SERVICES AND IS PERFORMANCE REVIEWED AGAINST THEM?

Scrutinising performance is key to ensuring that all members are receiving excellent services. By agreeing targets and monitoring them, the co-op is best placed to know how it is performing and to identify areas where improvement may be required.

B) DOES THE CO-OP ALLOCATE ITS HOMES IN A FAIR, OPEN AND TRANSPARENT WAY?

Co-op housing is in short supply in England and so it is right and proper that all co-ops should have a fair system for allocating their homes. Making allocations systems fair means considering how anyone might be able to make an application to become a member (including those who might have support needs, those who don't speak English as a first language and others with learning difficulties) and having clear criteria for choosing new members set out in a policy and operated impartially and objectively. The policy should also address how the co-op will deal with internal transfer and mutual exchange requests.

Potential conflicts of interest in allocating homes and personal interest should not influence decisions as to who is allocated a home. The allocations process should also be properly documented and recorded.

C) DOES THE CO-OP ISSUE AN APPROPRIATE TENANCY AGREEMENT AND DOES IT EXPLAIN IT TO NEW MEMBERS?

Co-ops need to ensure that they are issuing the appropriate form of tenancy agreement to new members. The tenancy sign up should include explanation and members should periodically review tenancy agreements to keep up to date with legislation. All members should also be given a member handbook that sets out basic tenancy issues and includes information on how the new member can get involved.

D) DOES THE CO-OP HAVE AN AGREED LETTABLE STANDARD AND EFFECTIVE VOID MANAGEMENT PROCEDURE?

Empty homes must be let as quickly as possible, but this is dependent on a number of factors – what works need doing to the home to be able to let it, the allocations process, demand for the empty home and how quickly the co-op's systems get moving. All co-ops need an effective voids policy, with target times for reletting an empty home.

E) DOES THE CO-OP DELIVER A HIGH QUALITY REPAIRS SERVICE THAT FITS IN WITH WHAT MEMBERS WANT AND ITS LEGAL REQUIREMENTS?

Repairs are a big issue for all members who want to know that repairs are going to be done quickly and efficiently.

Co-ops need to have a comprehensive Repairs Policy that sets out how:

- members report repairs
- the repairs service operates
- common areas will be maintained
- decisions about which contractors undertake repairs
- repairs will be prioritised by type and urgency
- quality of repairs will be ensured
- the co-op will ensure that it complies with legislation and regulations regarding health and safety issues for members
- that the governing body is regularly checking that the repairs service is delivering high quality, value for money and member satisfaction
- members changing needs will be met through provision of adaptations

F) DOES THE CO-OP HAVE APPROPRIATE RENT SETTING AND ARREARS POLICIES?

Effective rent collection and arrears policies are needed, which help members to pay their rent and maximise their benefit entitlements. The co-op also has to do what it can to minimise lost rent through voids and bad debts (and have a former tenant arrears policy).

Rents should to be agreed at a general meeting of the co-op and, as a minimum, need to bring in sufficient money to cover long term costs.

G) DOES THE CO-OP HAVE AN APPROPRIATE POLICY FOR TACKLING AND PREVENTING ANTI-SOCIAL BEHAVIOUR?

People have different views about what constitutes acceptable behaviour in a community. Co-ops are usually good at achieving a consensus of what is acceptable and most co-ops rarely suffer from incidents of what is often referred to as anti-social behaviour. However, when they happen, they can wreck members' lives and co-ops must have systems to deal with such complaints that include using the range of methods available to tackle problems, such as mediation, working with partner organisations and other more stringent approaches - and be prepared to use them where necessary.

H) DOES THE CO-OP HAVE AN APPROPRIATE MANAGEMENT COMPLAINTS POLICY?

Things can go wrong in any housing organisation, and co-ops need to have systems to deal with situations where a member is not happy. Complaints shouldn't be seen as being a personal attack on the co-op.

Co-ops must have a Management Complaints Policy and procedure that deals with complaints from members or members of the public against the co-op as an organisation, or about specific co-op officers, members of staff or service agencies. Complaints should be monitored to ensure that they are handled well and to track whether particularly large numbers of complaints on are being received on particular issues. Complaints should be followed through and inform and influence decisions on how future services are delivered.

I) ARE POLICIES IN PLACE TO DEAL WITH OTHER TENANCY MATTERS?

Co-ops also need to have effective policies in place for other tenancy matters, including:

- how they make sure that homes are still occupied by the members who are named on the tenancy agreement
- how members' requests to carry out improvement works in their homes will be considered
- tenant damage
- temporary absences from the home
- breaches of tenancy agreements



APPENDIX ONE - THE CO-OPERATIVE VALUES & PRINCIPLES

The Statement of Co-operative Identity established by the International Co-operative Alliance (ICA) in 1995 agreed the following:

VALUES

In order to maintain their identity co-operatives should ensure that they are supporting the following co-operative values:

- Self-help and responsibility
- Democracy
- Equality, equity and solidarity
- Honesty and openness
- Social responsibility and caring for others

PRINCIPLES

These are principles by which cooperatives put their values into practice. All co-operative should act in accordance with these following seven principles: -

1ST PRINCIPLE: VOLUNTARY AND OPEN MEMBERSHIP

Co-operatives are voluntary organisations; open to all persons able to use their services and willing to accept the responsibilities of membership, without gender, social, racial, political, or religious discrimination.

2ND PRINCIPLE: DEMOCRATIC MEMBER CONTROL

Co-operatives are democratic organisations controlled by their members, who actively participate in setting their policies and making decisions. Men and women serving as elected representatives are accountable to the membership. In primary cooperatives members have equal voting rights (one member, one vote), and co-operatives at other levels are also organised in a democratic manner.

3RD PRINCIPLE: MEMBER ECONOMIC PARTICIPATION

Members contribute equitably to, and democratically control, the capital of their co-operative. At least part of that capital is usually the common property of the co-operative. Members usually receive limited compensation, if any, on capital subscribed as a condition of membership. Members allocate surpluses for any or all of the following purposes: developing their co-operative, possibly by setting up reserves, part of which at least would be indivisible; benefiting members in proportion to their transactions with the co-operative; and supporting other activities approved by the membership.

4TH PRINCIPLE: AUTONOMY AND INDEPENDENCE

Co-operatives are autonomous, selfhelp organisations controlled by their members. If they enter into agreements with other organisations, including governments, or raise capital from external sources, they do so on terms that ensure democratic control by their members and maintain their co-operative autonomy.

5TH PRINCIPLE: EDUCATION, TRAINING AND INFORMATION

Co-operatives provide education and training for their members, elected representatives, managers, and employees so they can contribute effectively to the development of their co-operatives. They inform the general public – particularly young people and opinion leaders - about the nature and benefits of co-operation.

6TH PRINCIPLE: CO-OPERATION AMONG CO-OPERATIVES

Co-operatives serve their members most effectively and strengthen the cooperative movement by working together through local, national, regional, and international structures.

7TH PRINCIPLE: CONCERN FOR COMMUNITY

Co-operatives work for the sustainable development of their communities through policies approved by their members.

