



**linthouse**  
HOUSING ASSOCIATION

### Entitlements, Payments, and Benefits Policy

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| <b>Linthouse Housing Association</b>           |   |
| <b>Policy Implementation Checklist:</b>        |   |
| Policy Guardian:                               | Chief Executive Officer   |
| Policy Author:                                 | Corporate Services Manager  |
| Policy Title:                                  | Entitlements, Payments,<br>and Benefits Policy  |
| Approved by Chief Executive on:                |   |
| Approved by LHA Management Committee on:       | 15 <sup>th</sup> February 2022  |
| Effective from:                                | 16 <sup>th</sup> February 2022  |
| Due for Review on:                             | February 2025   |
|  |   |
|  |   |
| Policy Linkages:                               | Allocations<br>Reactive Repairs<br>Adaptations<br>Procurement<br>Decoration Allowances<br>Code of Conduct<br>Anti-Bribery<br>Anti-Fraud |
| Training Completed on:                         |   |
|  |   |
| Posted on Website on:                          |   |
|  |   |
| Staff Sign off as Read and Training Completed: |   |
|  |   |
| Resource Implications                          |   |

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## Section 1: Introduction

### 1.1 Entitlements, Payments, and Benefits Policy

1.1.1 Linthouse Housing Association (LHA) is committed to operating all areas of its business with integrity and accountability, and in a manner that is fair, transparent and consistent.

1.1.2 This Policy describes the rules and procedures we will follow when considering making a payment or granting a benefit to a person who has a connection with the Association.

**Note:** In this Policy, Linthouse Housing Association is referred to as “we” “us” or “our”.

### 1.2 Who the Policy Affects

1.2.1 All members of our Management Committee and everyone who works or volunteers with us.

1.2.2 For the remainder of this policy the above will be referred to as “our people”.

### 1.3 Equality and Diversity

1.3.1 Equality and diversity reflect the core values of Linthouse Housing Association and we strive to ensure that they are embedded throughout all of our services, policies and decision making. We are committed to promoting an inclusive and diverse culture that treats every individual with dignity, respect and fairness. We will actively challenge discrimination and empower people to succeed.

1.3.2 If you require further information, please refer to our Equality and Diversity Policy.

### 1.4 Our Mission

1.4.1 The Entitlements, Payments, and Benefits Policy forms part of our mission to:

“deliver high quality and cost-effective housing services designed to meet the needs of existing and future customers. To work in partnership with others to create thriving communities that people want to live and work in”.

## 1.5 Our Vision and Values

1.5.1 Our vision is the creation and sustainment of lasting, unique, vibrant homes in stable, popular and ambitious urban communities. Our vision is underpinned by four core values which we apply to all areas of our business. These are to be:

- i. **Customer Driven**
- ii. **Honest**
- iii. **Accountable**
- iv. **Transparent**

## 1.6 Our Organisational Culture

1.6.1 Our **C.H.A.T** values as outlined, form the foundation of our **Listen, Hear, Act (L.H.A.)** customer excellence and organisational culture programme. All staff receive training at induction on customer service standards and the organisational culture we promote. This includes reference to our equalities policy and a requirement to treat colleagues, tenants, contractors, service users and any other stakeholders with dignity and respect.

1.6.2 The organisational culture we promote is based on finding solutions to suit customer needs regardless of individual differences. To do this we will:

- 1. Listen** - We are committed to listening to those we do business with, be that our customers, staff, stakeholders, regulators or funders, to ensure that our responses are reflective of what people are saying to us.
- 2. Hear** - Once we listen and understand the need/demand/offer that is presented, we will ensure that we fully understand what is being said.
- 3. Act** - Whilst we will think about what we do, we want to be known for acting swiftly to deliver solutions and for always keeping our promises.

1.6.3 Our Customer Service Standards aim is to ensure all of our service users receive an excellent standard of service. The Charter helps define what our customers can expect when contacting or engaging with the staff in our office. It is available on our website, direct from the office, or in other formats as required.

## Section 2: About This Policy

2.1.1 We are a Registered Social Landlord (RSL) and a Scottish Charity. We are part of a sector that has a strong reputation for integrity and accountability to the people we exist to help and to our Regulators, partners and funders. We must ensure that the organisation upholds its reputation and that of the sector. Our people cannot benefit inappropriately from their connection with the organisation.

2.1.2 This policy describes the entitlements, payments or benefits that our people are able to receive. It also describes what is not permitted and the arrangements that we have in place to ensure that the requirements of this policy are observed.

2.1.3 The Scottish Housing Regulator (SHR) requires us to have a policy that sets out what payments and benefits we permit and to ensure that these arrangements demonstrate transparency, honesty and propriety<sup>1</sup>. We must ensure there is no justifiable public perception of impropriety. This policy is based on the SFHA's Model Entitlements, Payments and Benefits Policy which the SHR have confirmed meets their regulatory requirements

2.1.4 As we are a Scottish Charity, all of our Management Committee Members must also ensure that they comply with the Office of the Scottish Charity Regulator (OSCR) guidance to Charity Trustees<sup>2</sup> and charity legislation.

<sup>1</sup> Scottish Housing Regulator (April 2012) Regulatory Framework p28 section 5.13 available [here](#)

<sup>2</sup> Office of the Scottish Charity Regulator (Aug 2013) Guidance For Charity Trustees section 3 available [here](#)

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2.1.5 This Policy is intended to be a practical document that supports us in meeting all of the above requirements, ensuring that none of our people benefits, or are perceived to be benefitting, improperly or inappropriately from their

involvement with us, but also that they are not unfairly disadvantaged. We expect our people to act in good faith, and in applying the terms of the policy we will always take this into account.

2.1.6 As someone who is affected by this policy, you are personally responsible for ensuring that you are familiar with it and comply with its terms.

2.1.7 At all times, we expect a common-sense approach to be applied to the interpretation and application of this policy. If you are unsure about anything relating to entitlements, payments and benefits you should consult with the Chair or CEO (if you are a member of the Management Committee) or with your line manager (if you are a member of staff).

## 2.2 What this Policy Covers

2.2.1 This policy covers:

- Managing Your Interests
  - Registering and Declaring Interests
  - Entitlements, Payments & Benefits
- People Connected to You
  - Who Else You Should Consider When Declaring Interests
  - What You Should Consider
- Use of Our Contractors/Suppliers by Our People

## 2.3 Other Relevant Policies

2.3.1 The Code of Conduct is linked to this policy. Failure to comply with the terms of this policy will be regarded as a breach of the Code of Conduct.

2.3.2 You are also required to be familiar with and observe the terms of our Anti-Bribery and Anti-Fraud policies. We prohibit any attempt to induce the organisation or our people to offer preferential services or business terms and we will at all times comply with the Bribery Act 2010.

2.3.3 Our policies relating to the following are also relevant to this document and must be complied with at all times:

- Allocations
- Reactive Repairs
- Adaptations
- Procurement
- Decoration Allowances
- MC expenses (to be redrafted)

2.3.4 Please note that this list is not exhaustive and you are required to comply with all of our policies and procedures.

## Section 3: Managing Your Interests

### 3.1 Registering and Declaring Interests

3.1.1 In order to protect our reputation and demonstrate that we conduct our affairs with openness, honesty and integrity, we maintain a Register of Interests. You must record in this register any interests that you or someone connected to you (see Section 4) has which are relevant to our business and/or our activities. You are required to update the register if there are any changes to your circumstances resulting in an interest you or someone connected you has that is relevant to our business. In addition, you will be required to confirm annually that your entry is accurate and up to date.

3.1.2 Where you have an interest in any matter that is being discussed or considered, including at a meeting, you must declare your interest and play no part in the consideration, discussion and decision making; you must withdraw from any part of a meeting where the interest arises.

3.1.3 The Code of Conduct also contains a section on Declaring Interests that you should comply with at all times.

3.1.4 An annual report will be made to our Management Committee on the entitlements, payments, benefits that have been recorded in the Register by our people. In addition, we will provide committee and staff with the details of any new contractors to allow update to the Register as required.

3.1.5 The following are examples of the kind of interest that you must declare.

Please note that this list is not exhaustive, and there may be other interests that you should also declare.

- Tenancy of a property of which we are the landlord.
- Occupancy or ownership of a property which is factored or receives property related services from us.
- Membership of a community or other voluntary organisation that is active in the area(s) we serve.
- Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us.
- Membership of the Management Committee of another RSL.
- Being an elected member of any local authority where we are active.
- If you purchase goods or services from us.
- If you purchase goods or services from one of our contractors or suppliers (see section 4).
- Significant shareholding in a company that we do business with (or are considering doing business with).
- Membership of any other body whose interests and/or activities may directly affect our work or activities.



- Ownership of land or property in our areas of operation. This excludes property for the purpose of your own residential use (i.e. there is no requirement for you to declare any house in which you currently live).
- Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us.

3.1.6 You should note that in some circumstances, declaration of an interest may not be sufficient, and that it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation.

## 3.2 Entitlements, Payments and Benefits

3.2.1 Many of the interests you will be required to declare can be classed as entitlements, payments or benefits.

3.2.2 As one of our people, you potentially could be offered benefits over and above that to which you are contractually entitled (as a result of policy or contractual terms), such as gifts or hospitality from external parties. Such offers would be as a direct result of you being one of our people and cannot always be accepted. We require that any such offers are managed and recorded very carefully to ensure the highest levels of probity in our organisation. Our people should not benefit – or be seen to benefit – inappropriately from their involvement with us.

3.2.3 Apart from payments that our people are entitled to by contract, statute, policy or other agreement (e.g. salary, expenses), we will only make a payment to, or accept a payment from, someone affected by this policy in exceptional circumstances. Appendix A explains the payments we can and cannot make in more detail.

3.2.4 As we contribute to the economy of the area we work in and we have commercial and business relationships with many different companies, contractors, suppliers and service providers, you must ensure that we are fully

aware of any connection that you or someone you are close to (see section 4) has with any of these businesses or organisations.

3.2.5 Some entitlements, payments and benefits we can never permit, and others we have additional requirements or conditions that must be met before we can permit.

3.2.6 Appendix A lists the entitlements, payments and benefits that fall under this policy, and states:

- Which could be permitted by the organisation
- Which will never be permitted by the organisation
- Which you require to declare in the register of interests
- Any other further requirements the organisation has before permitting

## Section 4: People Connected To You

### 4.1 Who Else You Should Consider When Declaring Interests

4.1.1 Someone 'closely connected' to you includes members of your household, family members and other relatives and your friends.

4.1.2 As well as considering your own actions, you must be aware of the potential risk created by the actions of people to whom you are closely connected. Who you should consider, and our expectations of you to identify and declare such actions are outlined in Table A on page 11. If you are in any doubt about whether or not a declaration is required, you should consult the Chair, CEO or, for staff, line manager.

**Table A**

| <b>Group Member of your household</b><br><br>This includes:   | <b>Required Response</b>   |
|---|--|
| <b>1. Members of your household</b> <ul style="list-style-type: none"> <li>• Anyone who normally lives as part of your household, (whether related to you or otherwise),</li> <li>• Those who are part of your household but work or study away from home</li> </ul>  | We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to identify, declare and manage these.  |
| <b>2. Partner, Relatives and Friends</b><br><br>This includes: <ul style="list-style-type: none"> <li>• Your partner (if not part of household)</li> <li>• Your relatives and their partners</li> <li>• Your partner’s close relatives (i.e. parent, child, brother or sister)</li> <li>• Your friends</li> <li>• Anyone you are dependent upon or who is dependent upon you</li> </ul> | Where you have a close connection and are in regular contact with anyone within this group, we expect you to be aware of and declare any relevant actions. Under these circumstances, you must take steps to identify, declare and manage these actions.<br><br>Where you do not have a close connection and regular contact with someone in this group, we do not expect you to be aware of or to go to unreasonable lengths to identify any relevant actions. However, if you happen to become aware of relevant actions by such individuals, then these should be declared and managed as soon as possible. |

## 4.2 What You Need To Consider

4.2.1 The following are the relevant actions /involvement by those to whom you are closely connected that you should consider, declare and manage as per our expectations outlined in Table A (please be aware that this list is not exhaustive or exclusive): A significant interest in a company or supplier that we do business with (or are considering doing business with) or which is on our contactor/supplier list. A significant interest means ownership(whole or part) or a substantial shareholding in a business that distributes profits, but does not include

where an individual has shares in large companies such as banks, utility companies or national corporations, i.e. where owning shares would not give the individual any significant influence over the activities of that organisation.

- Where the individual may benefit financially from a company with which we do business (or are considering doing business with) which is on our contactor/supplier list.
- Involvement in the management of any company or supplier that we do business with (or are considering doing business with) which is on our contactor/supplier list. Involvement in tendering for or the management of any contract for the provision of goods or services to us.
- Application for employment with us.
- Application to join our Management Committee or any of its subsidiaries
- Application to be a tenant or service user of LHA
- If they are an existing tenant or service user of LHA

## Section 5: Use of Our Contractors & Suppliers

5.1.1 In order to help us maintain our excellent reputation, it is important that staff and committee members do not use their position to gain benefits which other members of the public cannot access. We have made a list available to all of our people which outlines the contractors and suppliers that fall under the terms of this policy. This is included at Appendix B.

5.1.2 At the same time we do not want to see staff and committee members face unreasonable restrictions which put them at a disadvantage compared to other members of the public.

5.1.3 Where, in your personal/home life, you as a staff or committee member need a service from a contractor, if it causes no disadvantage or inconvenience to you to avoid using one of the Association's contractors then we would ask that you do not use one.

5.1.4 A staff or Management Committee member should not use the services of one of the Association's contractors (as listed at Appendix B) for their own personal needs. If the employee can provide evidence that there is no available alternative, permission will be granted if the following conditions apply:

- The normal commercial rates are paid for this service and no preferential treatment, financial or otherwise, is received
- You report your proposed course of action to your departmental director or the Chair (as appropriate) before committing to use the contractor in question and follow any advice offered. In emergency situations you should comply with this policy retrospectively as soon as is practicably possible
- You make a written declaration that you have not received any advantage or preferential treatment (financial or otherwise) from the contractor or supplier arising out of their connection to the Association: written quotes should be provided where these would normally be sought for the type of work in question, and in ALL cases receipts should be provided
- You record the transaction or agreement in the Register of Payments and Benefits and keep the entry up to date.

5.1.5 Examples of situations that might arise in this context include buying goods or services from a connected business such as an architect or building contractor.

5.1.6 Appendix B lists the contractors to whom this policy applies. You will see that it does not include low value services such as sandwich shops, other high street stores and national chains, utility companies, banks and national telecoms providers etc.

5.1.7 In the event of a suspected breach of the Policy and Code of Conduct, staff will be subject to employee disciplinary procedures, up to and including dismissal. In the case of Management Committee members, following investigation appropriate action will be taken up to and including removal from the Management Committee.

## Section 6: Complaints and Review

### 6.1 Complaints

6.1.1 Our complaint handling procedure was established by the Scottish Public Services Ombudsman (SPSO).

6.1.2 In accordance with housing law, we provide our tenants and other customers with thorough information pertaining to our complaint handling process. Moreover, we also advise all service users on their right to complain.

6.1.3 A complaint is defined as:

“An expression of dissatisfaction by one or more members of the public about the housing association’s action or lack of action, or about the standard of service provided by or on behalf of the housing association”.

6.1.4 If a customer is dissatisfied about how we applied the Entitlements, Payments, and Benefits Policy or administered the process, the complaint will be dealt with through our Complaint Handling Process. This includes escalating the complaint to the Scottish Public Services Ombudsman (SPSO).

6.1.5 In the case of Management Committee members, if the dispute cannot be resolved through the normal complaints procedure and you remain dissatisfied, you should resign from the Management Committee in order to pursue the complaint independently.

### 6.2 Review

6.2.1 Our Rules require the Management Committee to set our policy on payments and benefits and keep it under review. This policy has been approved by our

Management Committee and is consistent with the requirements of our Codes of Conduct for Management Committee Members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements.

6.2.2 This policy was adopted by our Management Committee on 15<sup>th</sup> February 2022. It will be reviewed no later than February 2025 \_\_\_\_\_ .

Appendix A – Entitlements, Payments and Benefits

| EXAMPLE   | CAN THIS BE PERMITTED? | FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?  |
|---|------------------------|--|
| <b>HUMAN RESOURCES AND RECRUITMENT</b>  |                        |  |
| <p>All entitlements arising from your contract of employment with us or one of our subsidiaries, including (but not restricted to):</p> <ul style="list-style-type: none"> <li>• Payment of salary to staff</li> <li>• access to car or travel loans or salary advances where specified in the employment contract;</li> <li>• pension and/or private health care provided as part of the remuneration package;</li> <li>• performance related pay or bonus awarded in accordance with contractual terms;</li> <li>• books and equipment in connection with employment or training in accordance with agreed policies and/or contractual terms</li> <li>• Reimbursement of professional fees</li> </ul> | Yes                    | Any entitlement in the terms of your contract is always permitted without the need to record in the register of interests. There are Human Resource processes in place for this purpose. |
| Payment to a member of the Management Committee for their role as a Management Committee member, in accordance with the terms of their letter of appointment  | No                     | Such payments will only be permitted if they are in accordance with the conditions set out in Section 67(3) of the Charities and Trustees Investment (Scotland) Act 2005 <sup>3</sup>    |

<sup>3</sup> [Legislation.Gov.Uk](http://www.legislation.gov.uk) (2005) Charities and Trustees Investment (Scotland) Act 2005 Section 67 (3) available [here](#)



| EXAMPLE  | CAN THIS BE PERMITTED? | FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?  |
|--|------------------------|--|
|  |                        | The payment must be recorded in the register of interests within five days of the appointment being confirmed and the register must be kept up to date   |
| <p>All payments made in accordance with the terms of our expenses policy including:</p> <ul style="list-style-type: none"> <li>• payment of permitted out of pocket expenses</li> <li>• reimbursement of travel costs</li> </ul> | Yes                    | Entitlements in connection with your role as one of our people are set out in our expenses policy are always permitted and do not need to be declared provided claims are made in accordance with our procedures.  |
| Provision of a loan by the organisation to one of our people   | No                     | This is not permitted unless in connection with the contractual terms of employment. We cannot make any other loans to individuals.  |
| Redundancy or Voluntary severance payment to an employee   | Yes                    | <p>We can make redundancy payments to an employee in line with the terms of their contract</p> <p>Or</p> <p>We can make a voluntary severance payment to an employee which is outside the terms of their contract of employment provided:</p> <ul style="list-style-type: none"> <li>• It arises directly from a decision to terminate the employee's contract of employment</li> <li>• Payment is approved by the Management Committee</li> <li>• That the total sum of the non-contractual payment and benefit does not exceed, in the opinion of our employment adviser, the total cost of a successful application by the employee to a Court or Tribunal (including the likely level of compensation that might be awarded by a court or</li> </ul> |

| EXAMPLE  | CAN THIS BE PERMITTED? | FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?   |
|--|------------------------|---|
|  |                        | <p>tribunal and associated costs to the organisation to participate in the tribunal)</p> <ul style="list-style-type: none"> <li>• Payment does not exceed the equivalent of one year's salary for the employee</li> <li>• That this payment is instead of (rather than additional to) any redundancy entitlement</li> </ul>   |
| An offer of employment (temporary or permanent) to someone who is closely connected to a member of staff | Yes                    | <p>This is permitted as long as:</p> <ul style="list-style-type: none"> <li>• There has been an open recruitment exercise in accordance with our policy that you have not played any part in <b>and</b></li> <li>• You have no direct or indirect line management or supervision responsibility for the post <b>and</b></li> <li>• The offer of employment complies with our policy and is approved by the CEO <b>and</b></li> <li>• You record your connection to the successful applicant in the register within five days of their acceptance of the offer.</li> </ul> |

|  |                               |  |
|--|-------------------------------|--|
| The offer of employment or contract for the provision of services (e.g. specialist advice) to someone who is, or has been in the last twelve months, a member of our Management Committee or to anyone who is related to a member of the Management Committee. | No                            | This cannot be permitted.  |
| Appointment of one of our staff members to the Management Committee  | No                            | This cannot be permitted in accordance with the Rules of the organisation.   |
| <b>EXAMPLE</b>   | <b>CAN THIS BE PERMITTED?</b> | <b>FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?</b>   |
| Nominations to join the Management Committee from people who are connected to a serving member.  | Yes                           | This can be permitted in accordance with the Rules of the organisation.  |
| <b>OUR PEOPLE AS TENANTS OR SERVICE USERS</b>  |                               |  |
| The offer of a tenancy or lease in one of our or any of our subsidiaries' properties to one of our people or to someone closely connected to them.   | Yes                           | This is permitted as long as <ul style="list-style-type: none"> <li>• It is in accordance with our published allocations policy <b>and</b></li> <li>• Neither the applicant or anyone connected to the applicant is involved in any way or in any part of the allocation process <b>and</b></li> <li>• The offer is approved by the Management Committee in advance <b>and</b></li> <li>• The tenancy is recorded as an interest in the appropriate register within five days of the tenancy commencing</li> </ul> |

|  |                               |   |
|--|-------------------------------|---|
| Where one of our people (or someone connected to one of our people) is a tenant and receives a repair, improvement or adaptation to their home | Yes                           | <p><b>Repairs</b> carried out in accordance with our policy do not need to be recorded.</p> <p><b>Adaptations</b> must comply with our policy and be approved by the CEO. The adaptation should be recorded in the register of interests within five days of approval.</p> <p><b>Improvements</b> must be carried out as part of an approved programme and in accordance with our policy. The person affected should declare their interest if/when the programme is being discussed and the improvement recorded in the register of interests within five days of completion</p> |
| Where one of our people (or someone connected to one of our people) is a tenant and receives payment   | Yes                           | <b>Payment of decoration allowances or incentive/reward payments</b> must be made in accordance with our policies and procedures and recorded in the register within five days of receipt.  |
| <b>EXAMPLE</b>   | <b>CAN THIS BE PERMITTED?</b> | <b>FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?</b>  |
| of a decoration allowance, tenant reward/incentive as part of an agreed scheme or prize.   |                               | <b>Prizes or awards</b> in competitions open to all tenants in the same community (e.g. garden competitions) can only be given if the selection process for giving the award/prize has been carried out by someone who is independent. Receipt of the award and the circumstances surrounding it must be recorded in the register within five days of receipt.  |
| <b>TRAINING AND EVENTS</b>   |                               |   |
| Attendance at training events or seminars (e.g. SFHA Conferences) or openings/similar events hosted by other RSLs                              | Yes                           | There is no requirement to declare and record in the register of interests.   |

|  |                                       |   |
|--|---------------------------------------|---|
| <p>The organisation paying for accommodation in connection with attendance at relevant conferences or events that you are attending on behalf of or in connection with your role with us or our subsidiaries</p> | <p>Yes</p>                            | <p>Accommodation that is part of a conference or training package does not need to be recorded in the register, but attendance will be recorded on the relevant individual training plan.</p> <p>Residential conferences are important in ensuring that our people have the necessary skills, knowledge and experience to make an effective contribution to our activities.</p>   |
| <p>Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business.</p>  | <p>Yes (where not exceeding £500)</p> | <p>The Management Committee must approve attendance in advance, and will only do so if:</p> <ul style="list-style-type: none"> <li>• The organisation or one of our people (because of their role with us) has been nominated for an award; or</li> <li>• attendance is in recognition of achievement of or in pursuit of appropriate business development; or</li> <li>• we can demonstrate that attendance or participation is directly related to furthering our aims and objectives.</li> </ul> |

| EXAMPLE | CAN THIS BE PERMITTED? | FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?   |
|---------|------------------------|---|
|         |                        | <p>Where we ask you to represent us at such an event, this should be recorded in the register along with any associated costs (including travel, accommodation and the costs of attendance at the event) within five days of attendance.</p> <p><b>The total cost should not exceed £500 per person and we will make all arrangements in advance.</b></p> <p>Where costs would exceed £500, you will not be permitted to attend unless there is a clear, viable business case for attending. In such a case, specific approval of the Management Committee would be required.</p> |

## GIFTS AND HOSPITALITY

|  |                                    |   |
|--|------------------------------------|---|
| Gifts received from tenants and external sources | Yes (not exceeding a value of £60) | <p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights) can be accepted if:</p> <ul style="list-style-type: none"><li>• the cumulative value of gifts received from the same source in a 12 month period does not exceed £60</li><li>• you do not receive more than two such gifts from the same source in a 12 month period</li><li>• you record receipt of the gift(s) in the register</li></ul> <p>You should not normally accept other gifts and should decline any gifts with a value of more than £60 unless to do so would cause offence or otherwise damage our reputation. In these cases you must:</p> <ul style="list-style-type: none"><li>• Advise the donor that the gift will be donated to charity or will form part of our annual charity fund raising activities</li></ul> |
|--|------------------------------------|---|

| EXAMPLE   | CAN THIS BE PERMITTED?                     | FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?   |
|---|--|---|
|   |  | <ul style="list-style-type: none"> <li>Record the gift and the action taken in the register within five days</li> </ul> <p>You should not regularly accept gifts from the same source and never more than twice from the same source within a 12 month period. The total cumulative value of gifts received from the same source over the course of a year must never exceed £60.</p> <p>You should also record any offers that you decline and the reasons for this, in the register within five days.</p>   |
| <p>Gifts given from us to one of our people or received by one of our people from external sources to mark special occasions.</p> | <p>Yes (not exceeding a value of £100)</p> | <p>Gifts from the organisation to our people can be permitted in cases where it is to mark a special occasion or significant events including:</p> <ul style="list-style-type: none"> <li>Family events (e.g. marriage, milestone birthday, birth of a child),</li> <li>Retirement</li> <li>Leaving the organisation</li> </ul> <p>These must be recorded in the relevant register and the value of such gifts will not normally exceed £100.</p> <p>Please note, that this does not include collections by our people using their own personal funds to mark special occasions. These are always permitted with no requirement to declare. For staff, contractual terms may be in place that dictate the value of any gift upon retirement/long service.</p> |



|  |   |  |
|--|---|--|
| Hospitality associated with our business and that of its partners                        | Yes (when not exceeding a value of £60) | <p>Modest hospitality, such as a sandwich lunch or networking event, is permitted and does not need to be recorded</p> <p>All other hospitality up to a value of £60 is permitted but must be recorded in the register, along with an estimation of the value of hospitality received, within five days of attendance.</p>   |
| <b>EXAMPLE</b>   | <b>CAN THIS BE PERMITTED?</b>           | <b>FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?</b>   |
|  |   | <p><b>You should not accept invitations with a value that is greater than £60, unless you have prior approval from the Management Committee. The type of hospitality offered will also be taken into consideration, e.g. we will not normally accept invitations to sporting events, concerts, golf tournaments etc.</b></p> <p>In this case, the reason for acceptance must also be included in the register and countersigned by the CEO</p> |
| Our people seeking donations from our contractors/suppliers when fundraising for charity | Yes                                     | <p>This is permitted provided:</p> <ul style="list-style-type: none"> <li>• Approval is gained from the CEO prior to making any approach</li> <li>• Any donations received are recorded in the register</li> </ul> <p>We recognise our social responsibility and promote charity fundraising by the organisation and our people. We have a Donations &amp; Sponsorship policy that sets out our approach to supporting other charities.</p>    |

| <b>PROCURING GOODS/SERVICES</b>  |                               |  |
|--|-------------------------------|--|
| Sale of our interest (whole or part) in a property to someone affected by this policy via LIFT, HomeBuy; Help to Buy or other LCHO scheme      | Yes                           | <p>This is permitted, provided:</p> <ul style="list-style-type: none"> <li>• Our policy and procedures are followed</li> <li>• The prospective purchaser should play no part in the processing of the transaction by the organisation</li> <li>• It is declared and recorded in the register within five days of the missives being concluded confirming the process followed.</li> </ul>  |
| <b>EXAMPLE</b>   | <b>CAN THIS BE PERMITTED?</b> | <b>FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?</b>   |
| The organisation entering into a contract with an organisation where one of our people, or someone connected to them, has significant control. | No (in almost all cases)      | <p>This is not permitted in almost all circumstances. We could only consider this where:</p> <ul style="list-style-type: none"> <li>• The person affected by this policy is not involved in any part of the procurement process or decision</li> <li>• The appointment is approved by the Management Committee which is satisfied that the appointment is reasonable in the circumstances</li> <li>• There is no reasonable alternative (e.g. because of geography or the specialist nature of the goods/services)</li> </ul> <p>In such rare circumstances, the appointment would be recorded in the register along with details of the process followed.</p> |

|   |                                 |  |
|---|---------------------------------|--|
| <p>The purchase of land or other assets from anyone who is, or has been in the last twelve months, one of our people or who is connected to one of our people</p> | <p>No (in almost all cases)</p> | <p>This cannot be permitted in almost all cases.</p> <p>The only exception would be if you were referred to us under the Scottish Government's Mortgage to Rent scheme, where this would be permitted provided:</p> <ul style="list-style-type: none"> <li>• Our policy and procedures are followed</li> <li>• The prospective seller plays no part in the decision to purchase the property or the processing of the transaction by the organisation</li> <li>• It is declared and recorded in the register within five days upon conclusion</li> </ul> |
| <p>The purchase of goods/services from our suppliers/contractors by one of our people</p>   | <p>Yes</p>                      | <p>This should normally be avoided, and will only be potentially permitted if the procedure identified in Section 5 is followed</p>  |

Appendix C: Equality Impact Assessment

| <b>TITLE OF POLICY:</b>  | <b>Entitlements, Payments, and Benefits Policy</b>   |
|--|--|
| Strategic Outcome:   | To ensure organisational policies and decisions are carried out with integrity and accountability, and in a manner that is fair, transparent and consistent  |
| What is the purpose of the proposed Policy?  | The purpose of the Allocation Policy is to ensure there are rules and procedures to follow when LHA is considering making a payment or granting a benefit to a person who has a connection with the Association  |
| Protected Characteristic Groups affected by the Policy   | <ul style="list-style-type: none"> <li>• Age;</li> <li>• Disability;</li> <li>• Gender Reassignment;</li> <li>• Marriage and Civil Partnership;</li> <li>• Pregnancy and Maternity;</li> <li>• Race;</li> <li>• Religion or Belief;</li> <li>• Sex;</li> <li>• Sexual Orientation</li> <li>• language and social origin; and</li> <li>• other personal attributes</li> </ul> |
| Who is the target audience of this policy or who is intended to benefit from the proposed policy and how? (ie. employees, service users, management committee etc.)    | Employees and the Management Committee.  |
| List any existing documents, evidence, research which have been used to inform the EIA (this must include relevant data used in this assessment)                       | SFHA Model Entitlements, Payments, and Benefits Policy (2016) SFHA Model Code of Conducts for Staff and Management Committee   |
| Has any consultation involvement been undertaken with the Protected Characteristic Groups to inform this assessment? (please provide details of who and how consulted) | No   |
| What is the actual likely impact?  | Reduction in potential for reputational damage caused by staff or MC use of contractors employed by LHA.   |
| How have you, or will you, put the Policy into practice, and who is or will be responsible for delivering it?  | Head of Business Support to present policy to Management Committee and staff and provide staff training and update thereafter.   |
| How does the Policy fit into our wider or related policy initiatives?  | It fits with our wider policy related initiatives to operate with integrity and accountability, and in a manner that is fair, transparent and consistent   |
| Do you have a set budget for this work?  | Tbc  |