



Entitlements, Payments, and Benefits Policy

Policy Implementation Checklist:	
Policy Guardian:	Chief Executive Officer
Policy Author:	Corporate Services Manager
Date Approved Policy Working Group:	N/A
Date of Final Approval by LHA Management Committee:	N/A
Date of re-approval by Executive Team	13/01/25
Date effective from:	14/01/25
Due for review:	January 28
Policy linkages:	Allocations Reactive Repairs Adaptations Procurement Decoration Allowance Code of Conduct Anti-Bribery Anti-Fraud

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1. Overview

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.

This Policy is intended to ensure that none of our people benefit, or are perceived to be benefitting, improperly or inappropriately, as a result of their involvement with LHA. We expect our people to act in good faith and in applying the terms of this Policy.

2. Scope

This Policy applies to all staff, Management Committee members, and any other people who volunteer with us. This policy refers to:

- Managing your interests
 - Registering and declaring Interests
 - Entitlements, Payments & Benefits
- People connected to you
 - Who else should be considered when declaring interests
 - What should be considered
- Use of LHA contractors/suppliers by our people

3. Managing Your Interests

3.1 Registering and Declaring Interests

- 3.1.1 To protect LHA's 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) have 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 to you has that is relevant to LHA's business. In addition, you will be required to confirm annually that your entry in the Register is up to date and accurate.
- 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, and benefits that have been recorded in the Register by our people. In addition, we will provide the Committee and staff with the details of any new contractors to allow updates 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 that interests and/or activities may directly affect LHA's work or activities
- Ownership of land or property in LHA's areas of operation; this excludes property for your 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 LHA

3.1.6 You should note that in some circumstances, a declaration of interest may not be sufficient and that it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation 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 from external parties (as a result of policy or contractual terms), such as gifts or hospitality. 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 payment from, someone affected by this policy in exceptional circumstances. Appendix 1 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 LHA is 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 can never be permitted, and others have additional requirements or conditions that must be met before they can be permitted.
- 3.2.6 Appendix 1 lists the entitlements, payments, and benefits that fall under this policy, and states:
- Those that could be permitted by the organisation
 - Those that will never be permitted by the organisation
 - Those that you are required to declare in the Register of Interests
 - Any other further requirements the organisation has before permitting

4 People Connected to You

4.1 Who else should be considered when declaring interests

- 4.1.1 Someone ‘closely connected’ to you includes members of your household, partner, family members or other relatives, and friends.
- 4.1.2 As well as considering your actions, you must be aware of the potential risk created by the actions of people with 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. If you are in any doubt about whether or not a declaration is required you should consult your line manager or Corporate Services.

Table A

Group	Required Response
<p>1. Members of your household</p> <ul style="list-style-type: none"> • Anyone who normally lives as part of your household, (whether related to you or otherwise); • Those who are part of your household but work or study away from home 	<p>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.</p>
<p>2. Partner, relatives and friends</p> <p>This includes:</p> <ul style="list-style-type: none"> • Your partner (if not part of household) • Your relatives and their partners • Your partner’s close relatives (i.e. parent, child, brother or sister) • Your friends • Anyone you are dependent upon or who is dependent upon you 	<p>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.</p> <p>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.</p>

4.2 What should be considered

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 in accordance with Table A (please be aware that this list is not exhaustive or exclusive):

- A significant interest in a company or supplier that LHA does business with (or is considering doing business with) or which is on the contractor/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 LHA does business (or is considering doing business with) which is on the contractor/supplier list.
- Involvement in the management of any company or supplier that LHA does business with (or is considering doing business with) which is on the contractor/supplier list. Involvement in tendering for, or the management of any contract, involving the provision of goods or services to LHA.
- Application for employment with LHA.
- Application to join the Management Committee
- Application to be a tenant or service user of LHA
- If they are an existing tenant or service user of LHA

5 Use of LHA contractors/suppliers by our people

- 5.1 To help LHA maintain its excellent reputation, staff and committee members must not use their position to gain benefits which other members of the public cannot access. An up-to-date list of contractors and suppliers that fall under the terms of this policy is updated periodically and can be requested from Corporate Services.
- 5.2 LHA recognise that there could be certain circumstances where it might not be possible to avoid the use of contractors/suppliers on LHA's list, such as where market conditions in the local area make it difficult to obtain a reasonable selection of potential contractors or suppliers. In these circumstances, you can seek approval from the relevant departmental Director or Chair of the Management Committee (whichever is relevant), provided you can demonstrate that there is no reasonable alternative contractor/supplier providing the service required and that you will receive no preferential treatment in terms of service or cost (which you will be required to demonstrate through quotations and receipts)
- 5.3 If you are looking to purchase goods or services from any contractor/supplier on LHA's list then a written declaration in the register of interests is required and should state:
- That you have received approval from the appropriate approving officer before the commencement of works.
 - That you have not received any advantage or preferential treatment (financial or otherwise) from the contractor or supplier arising out of your connection to LHA: written quotes should be provided where these would normally be sought for the type of work in question, and receipts provided in ALL cases.
 - Where you inadvertently use a contractor on the list in an emergency, you must notify your departmental Director or Chair as soon as possible thereafter, and enter an appropriate declaration in the register.

- 5.4 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.
- 5.5 Any contractor/supplier not included on LHA's list can be used without the need for any declaration/further action.
- 5.6 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, appropriate action will be taken up to and including removal from the Management Committee, following a full investigation.

6 Review

- 6.1 This policy will be reviewed every three years or earlier subject to any changes made to the SFHA Model Policy.

7. Equalities Impact Assessment

Entitlements, Payments & Benefits Policy	
What is the purpose of this policy?	To ensure there are 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 this policy:	All
Who is the target audience of this policy?	Employees, Management Committee and any others volunteering on behalf of the Association.
List any existing documentation used to complete this assessment:	SFHA Model Entitlements, Payments, and Benefits Policy (2021) SFHA Model Code of Conducts for Staff and Management Committee (2024).
Has any consultation taken place with protected characteristics groups identified?	No
What is the likely impact?	Ensures good governance practice in the giving/receiving of any EPB; reduces the risk of any reputational or other damage to the Association.
Have you, or will you, put the policy into practice? Who is responsible for the delivery of the policy?	Yes; policy is already in place and all staff/volunteers must adhere to it.
How does this 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 fair, transparent and consistent way.
Do you have a set budget for this work?	No

8. Version Control

Version Number	Name	Author	Notes
2.0	EPB	CSM	Jan 25 – No material amendments; format change only; approval by ET 13.01.25

Appendix 1 - Entitlements, Payments and Benefits

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
HUMAN RESOURCES AND RECRUITMENT		
<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"> • Payment of salary to staff; • Reimbursement of travel or other out-of-pocket expenses incurred during working hours • Access to car or travel loans or salary advances where specified in the employment contract; • Pension and/or private health care provided as part of the remuneration package; • Performance related pay or bonus awarded under contractual terms; • Books and equipment in connection with employment or training following agreed policies and/or contractual terms • Reimbursement of professional fees 	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.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
HUMAN RESOURCES AND RECRUITMENT (Cont.)		
Payment to a member of the Management Committee for their role as a Management Committee member.	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. 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.
All payments made in accordance with the terms of our Committee Expenses policy including: <ul style="list-style-type: none"> • payment of permitted out-of-pocket expenses • reimbursement of travel costs 	Yes	Entitlements in connection with your role as one of our people are set out in LHA's Committee Expenses policy and are always permitted without the need to be declared provided claims are made following LHA's 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.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
HUMAN RESOURCES AND RECRUITMENT (Cont.)		
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"> • It arises directly from a decision to terminate the employee's contract of employment • Payment is approved by the Management Committee • 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 tribunal and associated costs to the organisation to participate in the tribunal) • Payment does not exceed the equivalent of one year's salary for the employee • Payment is instead of (rather than additional to) any redundancy entitlement.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
HUMAN RESOURCES AND RECRUITMENT (Cont.)		
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"> • There has been an open recruitment exercise following LHA's policy and the staff member concerned has not played any part in it, and • The staff member has no direct or indirect line management or supervision responsibility for the post, and • The offer of employment complies with LHA's policy and is approved by the CEO, and • The connection to the successful applicant is recorded in the register within five days of their acceptance of the offer.
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 under the Rules of the Association.
Nominations to join the Management Committee from people who are connected to a serving member.	Yes	This can be permitted under the Rules of the Association.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
OUR PEOPLE AS TENANTS OR SERVICE USERS		
The offer of a tenancy or lease in one of our properties to one of our people or to someone closely connected to them.	Yes	<p>This is permitted as long as</p> <ul style="list-style-type: none"> • LHA’s Allocations Policy is followed and • Neither the applicant nor anyone connected to the applicant is involved in any way or any part of the allocation process and • The offer is approved by the Management Committee in advance and • The tenancy is recorded as an interest in the appropriate register within five days of the tenancy commencing
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>Repairs carried out in accordance with LHA policy do not need to be recorded.</p> <p>Adaptations must comply with LHA policy and be approved by the CEO. The adaptation should be recorded in the register of interests within five days of approval.</p> <p>Improvements must be carried out as part of an approved programme and in accordance with LHA 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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
OUR PEOPLE AS TENANTS OR SERVICE USERS (Cont.)		
Where one of our people (or someone connected to one of our people) is a tenant and receives payment of a decoration allowance, tenant reward/incentive as part of an agreed scheme or prize.	Yes	<p>Payment of decoration allowances or incentive/reward payments must be made following LHA's policies and procedures and recorded in the register within five days of receipt.</p> <p>Prizes or awards 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 independent. Receipt of the award and the circumstances surrounding it must be recorded in the register within five days of receipt.</p>
EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
TRAINING AND EVENTS		
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.
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	Yes	<p>The 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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
TRAINING AND EVENTS (Cont.)		
Attendance by you at events to mark awards, achievements or other significant milestones relevant to LHA.	Yes (where not exceeding £500)	<p>The Management Committee must approve attendance in advance, and will only do so if:</p> <ul style="list-style-type: none"> • The organisation or one of our people (because of their role with us) has been nominated for an award; or • Attendance is in recognition of achievement of or in pursuit of appropriate business development; or • It can be demonstrated that attendance or participation is directly related to furthering LHA's aims and objectives <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>The total cost should not exceed £500 per person and we will make all arrangements in advance.</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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
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"> • the cumulative value of gifts received from the same source in a 12 month period does not exceed £60 • you do not receive more than two such gifts from the same source in a 12 month period • you record receipt of the gift(s) in the register <p>You should not normally accept other gifts and should decline any gifts with a value of more than £60 unless doing so would cause offence or otherwise damage our reputation. In these cases, you must:</p> <ul style="list-style-type: none"> • Advise the donor that the gift will be donated to charity or will form part of our annual charity fundraising activities • Record the gift and the action taken in the register within five days <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> <ul style="list-style-type: none"> • You should also record any offers that you decline and the reasons for this, in the register within five days

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
GIFTS AND HOSPITALITY (Cont.)		
<p>Gifts given by 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 event including:</p> <ul style="list-style-type: none"> • Family events (e.g. marriage, milestone birthday, birth of a child), • Retirement, • Leaving the organisation <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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
GIFTS AND HOSPITALITY (Cont.)		
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> <p>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.</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 or suppliers when fundraising for charity	Yes	<p>This is permitted provided:</p> <ul style="list-style-type: none"> • Approval is gained from the CEO before making any approach • Any donations received are recorded in the register <p>We recognise our social responsibility and promote charity fundraising by the organisation and our people. We have a Donations & Sponsorship policy that sets out our approach to supporting other charities.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
PROCURING GOODS/SERVICES		
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"> • Our policy and procedures are followed • The prospective purchaser should play no part in the processing of the transaction by the organisation • It is declared and recorded in the register within five days of the missives being concluded confirming the process followed.
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"> • The person affected by this policy is not involved in any part of the procurement process or decision • The appointment is approved by the Management Committee which is satisfied that the appointment is reasonable in the circumstances • There is no reasonable alternative (e.g. because of geography or the specialist nature of the goods/services) <p>In such rare circumstances, the appointment would be recorded in the register along with details of the process followed.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
PROCURING GOODS/SERVICES (Cont.)		
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	No (in almost all cases)	<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"> • Our policy and procedures are followed • The prospective seller plays no part in the decision to purchase the property or the processing of the transaction by the organisation • It is declared and recorded in the register within five days of conclusion
The purchase of goods/services from our suppliers or contractors by one of our people	Yes	This should normally be avoided, however, there may be occasions where this is permitted provided the procedures referred to in Section 5 of this policy are followed.