

Disclosure of Interests Policy and Procedures

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Scottish Social Housing Charter Relevant Standards and Outcomes

STANDARD	OUTCOME
N/A	

Scottish Housing Regulator – Relevant Standards of Governance and Financial Management and Guidance

STANDARD	GUIDANCE
<p>1 The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.</p>	<p>1.2 The RSL's governance policies and arrangements set out the respective roles, responsibilities and accountabilities of governing body members and senior officers, and the governing body exercises overall responsibility and control of the strategic leadership of the RSL.</p> <p>1.3 The governing body ensures the RSL complies with its constitution and its legal obligations. Its constitution adheres to these Standards and the constitutional requirements set out below.</p>
<p>2 The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.</p>	<p>2.2 The governing body recognises it is accountable to its tenants, and has a wider public accountability to the taxpayer as a recipient of public funds, and actively manages its accountabilities.</p> <p>2.3 The governing body is open and transparent about what it does, publishes information about its activities and, wherever possible, agrees to requests for information about the work of the governing body and the RSL.</p>
<p>4 The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.</p>	<p>4.3 The governing body identifies risks that might prevent it from achieving the RSL's purpose and has effective strategies and systems for risk management and mitigation, internal control and audit.</p>
<p>5 The RSL conducts its affairs with honesty and integrity.</p>	<p>5.1 The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds the good</p>

	<p>reputation of the RSL and the sector.</p> <p>5.2 The RSL upholds and promotes the standards of behaviour and conduct it expects of governing body members and staff through an appropriate code of conduct. It manages governing body members' performance, ensures compliance and has a robust system to deal with any breach of the code.</p> <p>5.4 Governing body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position.</p>
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DISCLOSURE OF INTERESTS POLICY AND PROCEDURES

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DISCLOSURE OF INTERESTS POLICY AND PROCEDURES

1. INTRODUCTION

1.1 Lochalsh and Skye Housing Association is committed to the highest standards of openness, probity and accountability. All Board and Staff members are governed by Codes of Conduct which, amongst other things are designed to ensure that all Board and Staff members should:-

- Recognise that his/her over-riding duty is to the members, tenants and sharing owners of the Association;
- Do nothing which could not be justified to the Board, to the tenants and sharing owners, to the membership or to the public;
- Recognise that it is not enough to avoid actual impropriety and that he/she should at all times avoid situations which could give rise to a suspicion or the appearance of improper conduct.

1.2 In addition, to the Codes of Conduct, all Board and Staff members are governed by the terms of the following policies:-

- Entitlements, Payments and Benefits Policy
- Anti-Bribery Policy
- Gifts and Hospitality Policy
- Fraud and Errors Policy
- Sponsorship Policy
- Whistleblowing Policy
- Equality and Diversity Policy
- Privacy Policy
- Freedom of Information Policy and Procedures

2. REGISTER OF INTERESTS

2.1 The Association will maintain a Register of Interests of all individual Board and Staff members. The entry in the Register will contain the following information:-

- Title
- Name
- Home Address
- Date of Birth
- Current Employment Status (unemployed or retired, as appropriate)
- Job Title
- Name of Employer or Business
- Office bearing responsibility on the Board
- Tenancy of a property (by the individual or someone to whom they are closely connected) of which we are the landlord

- Occupancy or ownership of a property (by the individual or someone to whom they are closely connected) which is factored or receives property related services from us
- Receipt of care or support 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 governing body of another RSL
- Being an elected member of any local authority where we are active
- If the individual purchases goods or services from us
- If the individual purchases goods or services from one of our approved contractors or Framework Agreement partners
- Significant shareholding in a company that we do business with
- Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities
- Ownership of land or property in our areas of operation excluding for the purpose of their own residential use (i.e. there is no requirement for the individual to declare any house in which they 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
- Any other relevant interests not listed above.

3. ADDING, AMENDING OR DELETING AN ENTRY IN THE REGISTER

- 3.1 It is the individual responsibility of Board and Staff members to keep their entry in the Register of Interests up to date, to add any new interests as soon as they arise and to amend or delete existing interests as soon as any change takes effect.
- 3.2 Any failure to make a complete, accurate and prompt declaration – whether deliberately or through taking insufficient care – will be regarded as a breach of the Codes of Conduct.

4. THE REGISTER OF INTERESTS FORM

- 4.1 All members of the Board and staff are required to complete a Register of Interests Form (See Appendix One).
- 4.2 The Form will be issued to all new Board members immediately following their inclusion on the Board.
- 4.3 The Form will be issued to all new staff members at their induction session

held immediately on the commencement of their employment.

- 4.4 All additions, amendments or deletions to the Register are required to be notified to the Personal Assistant in writing or by e-mail. A copy of the amended Register will be sent to the individual Board or Staff member for their records by the Personal Assistant.

5. ADVICE AND GUIDANCE ON THE REGISTER

- 5.1 The agenda for all meetings of the Board or Sub-Committees will include a reminder that the Register of Interests requires to be updated promptly.
- 5.2 The agenda for all meetings of the Board or Sub-Committees will include a reminder that Members require to consider whether they have an interest to declare in relation to any item on the agenda for the meeting. Such declarations will be recorded in the Minutes of the meeting. The member is required to leave the meeting for the duration of the particular item.
- 5.3 Guidance on all aspects of declarations of interests can be obtained from the Chairperson or Chief Executive.

6. GENERAL DATA PROTECTION REGULATIONS

- 6.1 The Association will treat your personal data in line with our obligations under the current data protection regulations and our own policies and procedures.
- 6.2 Information regarding how your data will be used and the basis for processing your data is provided in the Association's Privacy Policy.

7. REVIEW

- 7.1 This document will be reviewed by the Board or Sub-Committee set up for that purpose in accordance with the requirements of the Association's Register of Policies and Procedures.
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LOCHALSH AND SKYE HOUSING ASSOCIATION LTD

REGISTER OF INTERESTS

I have read and signed the Code of Conduct for Board/Staff members and understand that it is essential that there is no conflict – and that there can be no reasonable perception of conflict – between my duties as a Board/Staff member and my personal (or personal business or financial) interests.

Any potential conflict between my position as a Board/Staff member and my other interests will be openly declared and effectively managed to protect the good reputation of the Association and the RSL sector.

When I have a personal business or financial interest in any matter that is relevant to the Association's activities or is being considered (or is likely to be considered) or I know that someone to whom I am closely connected has such an interest, I will declare it promptly and record it in the Register of Interests.

TITLE:

NAME:

HOME ADDRESS:

POSTCODE:

TELEPHONE:

EMAIL ADDRESS TO BE USED:

DATE OF BIRTH:

PLACE OF BIRTH:

NATIONALITY:

CURRENT EMPLOYMENT STATUS:-

☐ Employed ☐ Self-Employed ☐ Unemployed ☐ Retired

JOB TITLE:

NAME OF EMPLOYER OR BUSINESS:

In accordance with the Board and (Staff) Codes of Conduct, you must declare the following interests where applicable. If you have no interest to declare in each category, please state "NONE".

Tenancy of a property (by the individual or someone to whom they are closely connected) of which we are the landlord.

Details:

Occupancy or ownership of a property (by the individual or someone to whom they are closely connected) which is factored or receives property related services from us.

Details:

Receipt of care or support services from us.

Details:

Membership of a community or other voluntary organisation that is active in the area(s) we serve.

Details:

Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us.

Details:

Membership of the governing body of another RSL.

Details:

Being an elected member of any local authority where we are active.

Details:

If the individual purchases goods or services from us.

Details:

If the individual purchases goods or services from one of our approved contractors or Framework Agreement partners.

Details:

Significant shareholding in a company that we do business with.

Details:

Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities.

Details:

Ownership of land or property in our areas of operation excluding for the purpose of their own residential use (i.e. there is no requirement for the individual to declare any house in which they currently live).

Details:

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.

Details:

Any other relevant interests not listed above.

Details:

To assist in enabling the Association to comply with its Equality and Diversity Policy, you are requested to complete the attached Ethic Origin and Disability Monitoring Form.

**ETHNIC ORIGIN & DISABILITY MONITORING FORM
BOARD AND STAFF MEMBERS**

A. ETHNIC ORIGIN

What is your Ethnic Origin: (Please tick one box from one section)

(i) WHITE

- (a) ☐ Scottish
- (b) ☐ Other British
- (c) ☐ Irish
- (d) ☐ Gypsy/Traveller
- (e) ☐ Polish
- (f) ☐ Any other white background

(ii) MIXED or MULTIPLE ETHNIC BACKGROUND

(iii) Asian, Asian Scottish or Asian British

- (a) ☐ Indian
- (b) ☐ Pakistani
- (c) ☐ Bangladeshi
- (d) ☐ Chinese
- (e) ☐ Any other Asian background

(iv) BLACK, BLACK SCOTTISH, BLACK BRITISH

- (a) ☐ Caribbean
- (b) ☐ African
- (c) ☐ Any other black background

(v) OTHER ETHNIC BACKGROUND

- (a) ☐ Arab, Arab Scottish or Arab British
- (b) ☐ Any other group

(vi) UNKNOWN

- (a) ☐

B. DISABILITY

Under the Equality Act 2010, a person has a disability if:

They have a physical or mental impairment;

The impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities.

Substantial means more than minor or trivial.

Long-term means that the effect of the impairment has lasted or is likely to last for at least twelve months (there are special rules covering recurring or fluctuating conditions).

Normal day-to-day activities include everyday things like eating, washing, walking and going shopping

Do you have a disability?

Yes ☐ No ☐

Data Protection Act 2018

The Association is registered under the Data Protection Act 2018. Information you provide in this form will be processed fairly and lawfully for the following purposes:

- a) For administrative purposes, reporting monitoring data and using information as statistical data for strategic planning.
- b) For equal opportunities monitoring.

For independent advice about data protection, privacy and data sharing issues contact the Information Commissioner at:

The Information Commissioner's Office – Scotland
Queen Elizabeth House, Sibbald Walk, Edinburgh, EH8 8FT
Telephone: 0303 123 1115
Email: Scotland@ico.org.uk

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SCHEDULE OF REVISIONS		
DATE	REVISION No.	DETAILS
14/12/2015	2.1	Revised Register of Interests form inserted.
18/11/2019	2.2	ADDED: Cover page – new SHR Standards of Governance and Financial Management
18/11/2019	2.2	ADDED: NEW Point 6 - GENERAL DATA PROTECTION REGULATIONS
18/11/2019	2.2	ADDED 2 NEW policies at 1.2 - <ul style="list-style-type: none"> ➤ Privacy Policy ➤ Freedom of Information Policy and Procedures
29/10/2020	2.2	CHANGED: Management Committee to The Board