

Entitlements, Payments and Benefits Policy

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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>1.3 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 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</p>

compliance and has a robust system to deal with any breach of the code.

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.

ENTITLEMENTS, PAYMENTS AND BENEFITS POLICY

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ENTITLEMENTS, PAYMENTS, AND BENEFITS POLICY

1. Introduction

Who the Policy Affects

- 1.1 This policy is aimed at people who are:
- Members of our Governing Body and of the governing body of any of our subsidiaries
 - Everyone who works for us or any of our subsidiaries
- 1.2 For the remainder of this policy the above will be referred to as “our people.”

About This Policy

- 1.3 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. 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.
- 1.4 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.
- 1.5 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 propriety¹. We must ensure there is no justifiable public perception of impropriety.
- 1.6 As we are a Scottish Charity, all of our Governing Body Members must also ensure that they comply with the Office of the Scottish Charity Regulator (OSCR) guidance to Charity Trustees² and charity legislation.
- 1.7 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 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.
- 1.8 As someone who is affected by this policy, you are personally responsible for ensuring that you are familiar with and comply with its terms.

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

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

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

What this Policy Covers

- 1.10 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

Other Relevant Policies

- 1.11 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.
- 1.12 You are also required to be familiar with and observe the terms of our Anti-Bribery and Fraud policy. 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.
- 1.13 Our policies relating to the following are also relevant to this document and must be complied with at all times:
- Allocations
 - Repairs and Improvements
 - Adaptations
 - Procurement
 - Training
 - Expenses
 - Recruitment
 - Sale of our Property
 - Decoration Allowances/Prizes

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

2. Managing Your Interests

Registering and Declaring Interests

- 2.1 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 3) has which are relevant to our business. You will be required to confirm annually that your entry is accurate and up to date.
- 2.2 Where you have an interest³ in any matter that is being discussed or considered at a meeting, you must declare your interest and play no part in the discussion; you must withdraw from any part of a meeting where the interest arises.
- 2.3 The Code of Conduct also contains a section on Declaring Interests that you should comply with at all times.
- 2.4 An annual report will be made to our Governing Body on the entitlements, payments, benefits that have been recorded in the Register.

Entitlements, Payments and Benefits

- 2.5 Many of the interests you will be required to declare can be classed as entitlements, payments or benefits.
- 2.6 As one of our people, you potentially could be offered benefits over and above that to which you are contractually entitled, 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.
- 2.7 Apart from payments that our people are entitled to by contract, statute 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.
- 2.8 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 3) has with any of these businesses or organisations.

³ This will not necessarily be on the register and may only arise as discussion takes place

2.9 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.

2.10 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

3. **People Connected To You**

Who Else You Should Consider When Declaring Interests

3.1 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 associated as outlined in Table A:

Table A

Group	Required Response
<p>1. Members of your household</p> <p>This includes:</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 close friends • Anyone you are dependent upon or who is dependent upon you • Acquaintances (such as 	<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</p>

neighbours, someone you know socially or business contacts/associates)	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.
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3.2 In relation to Table A above, when considering actions you should do so from the point of view of a reasonable and objective observer and a common sense approach should be adopted at all times.

What You Need To Consider

3.3 The following are the actions and involvement by those to whom you are closely connected that, should you become aware, we would expect you to notify us by making a declaration in the register: :

- A significant interest in a company or supplier that we do business with or which is on our approved 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 we do business with or is on our approved list
- Involvement in the management of any company or supplier that we do business with or which is on our approved 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 Board or any of its subsidiaries
- Application to be a tenant or service user of the organisation
- If they are an existing tenant or service user of the organisation

4. Use of our contractors and suppliers

4.1 Lochalsh & Skye Housing Association has a well-earned reputation for integrity and honesty and is committed to acting with transparency, honesty and propriety and avoiding any reasonable public perception* of improper conduct. In order to help us maintain our excellent reputation, it is important that staff and Committee members do not misuse their position to gain benefits which would not be available to other members of the public.

- 4.1.1 * Reasonable public perception is defined as – “How does it look to a reasonable and objective member of the public who has knowledge of all the facts?”
- 4.2 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.
- 4.3 Where, in your personal/home life, you need a service from a contractor or supplier, if it causes no disadvantage or inconvenience to you to avoid using someone off our approved list, then we would ask that such use is avoided.
- 4.4 However, it is extremely important that where you wish to use one of our contractors or suppliers (as listed in Appendix B) you take the following steps to help prevent actual or perceived impropriety:
- Ensure the normal commercial rates are paid for this service and no preferential treatment, financial or otherwise, is received.
 - Make no reference to your role/position in the Association during any private negotiations, and do not respond to any attempt by a supplier/contractor to engage with you on the subject.
 - Do not approach any suppliers or contractors through the Association, this includes the use of work email accounts.
 - Do not avail, or attempt to avail yourself of any preferential rates agreed by the Association, or draw on Association contracts or framework agreements.
 - Make a written declaration that you have not received any advantage or preferential treatment (financial or otherwise) from the contractor or supplier as a result of your connection with 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
 - Record the transaction in the Register of Payments and Benefits and keep the entry up to date.
- 4.4.1 You do not need to record any transactions with a value below (£500), but should still act within the spirit of this policy and be able to defend your decision in the light of any complaint or allegation.
- 4.4.2 For transactions with a value between £500 and £5,000, where practical, you should discuss this in advance with the CE or the Chair (as appropriate) and follow any guidance. You must record, in the register, your use of the contractor within 10 days of receiving the goods or service and receipts provided.
- 4.4.3 For any transactions in excess of £5,000, you must receive written approval from the CE or Chair (as appropriate) before entering into any contract. In

such cases, you may be required to provide evidence that you have not received any favourable terms as a result of your connection to us.

4.5 **Appendix B** lists the contractors and suppliers to whom this policy applies. We have excluded:

- suppliers of low value services such as sandwich shops & other high street stores
- national chains, utility companies, transport companies, banks and national telecoms providers etc
- contractors or suppliers used so rarely by us that no favour could realistically be gained.

4.6 This Policy also applies to situations where you wish to engage services such as factoring, maintenance services, small repairs and Care & Repair, normally provided to the general public by the Association or its subsidiary.

4.7 If there is any difficulty in agreeing how the requirements of Section 4 of this Policy should be applied, a staff member may appeal through the normal grievance procedure. In the case of Committee members, the Chair's decision will be final.

5. **General Data Protection Regulations**

5.1 The Association will treat your personal data in line with our obligations under the current data protection regulations and our own policies and procedures.

5.2 Information regarding how your data will be used and the basis for processing your data is provided in the Association's Privacy Policy.

6. **Monitoring and Review**

6.1 Our Rules require the Governing Body to set our policy on payments and benefits and keep it under review. This policy has been approved by our Governing Body and is consistent with the requirements of our Codes of Conduct for Governing Body Members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements.

6.2 The Chief Executive will be responsible for monitoring compliance with this policy on a regular basis.

6.3 The Audit Finance and Performance Sub-Committee will receive a report annually which details:-

- numbers of recorded declarations for use of suppliers at each level;
- level of reputational risk arising from staff and Governing Body usage of suppliers and contractors;
- compliance with, and effectiveness of, this policy.

- 6.4 Internal Audit will be asked to review the implementation and operation of this policy after 1 year and thereafter on a 3-yearly cycle.
- 6.5. This document will be reviewed by the Management Committee or Sub-Committee set up for that purpose in accordance with the requirements of the Association's Register of Policies and Procedures.

Appendix A – 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 • 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 in accordance with contractual terms; • books and equipment in connection with employment or training in accordance with 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.
Payment to a member of the governing body for their role as a governing body member, in accordance with the terms of their letter of appointment	No	<p>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 2005⁴.</p> <p>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>
<p>All payments made in accordance with the terms of our expenses policy including:</p> <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 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

⁴ 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?
		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 terms 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 Governing Body • 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 • That this payment is instead of (rather than additional to) any redundancy entitlement
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 in accordance with our policy that you have not played any part in and • You have no direct or indirect line management or supervision responsibility for the post and • The offer of employment complies with our policy and is approved by the Management Committee and • You record your connection to the successful applicant in the register within five days of their acceptance of the offer.
The offer of employment to someone who is, or has been in the last twelve months, a member of our Governing Body	No	This cannot be permitted under our Rules. The Rules define a "close relative" as being: spouse, civil partner, cohabitee, parent, grandparent,

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
or to anyone who is a close relative of a member of the Governing Body		child, stepchild, grandchild, brother or sister.
Appointment of one of our staff members to the Governing Body	No	This cannot be permitted in accordance with the Rules of the organisation.
Nominations to join the Governing Body from people who are connected to a serving member.	Yes	This can be permitted in accordance with the Rules of the organisation.
OUR PEOPLE AS TENANTS OR SERVICE USERS		
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"> • our Policies and Procedures are followed and • Neither the applicant or anyone connected to the applicant is involved in any way or in any part of the allocation process and • The offer is approved by the Governing Body 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	Repairs carried out in accordance with our policy do not need to be recorded. Adaptations must comply with our policy and be approved by the Management Committee. The adaptation should be recorded in the register of interests within five days of approval. Improvements 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
Where one of our people (or someone connected to one of our people) is a tenant and receives payment of a	Yes	Payment of decoration allowances or incentive/reward payments must be made in accordance with our policies and procedures and

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
decoration allowance, tenant reward/incentive as part of an agreed scheme or prize.		<p>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 who is independent. Receipt of the award and the circumstances surrounding it must be recorded in the register within five days of receipt.</p>
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>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>
Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business.	Yes	<p>The Budget holder must approve attendance prior, 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 • we can demonstrate that attendance or participation is directly related to furthering our 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</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>of attendance.</p> <p>The total cost should not exceed £200 per person and we will make all arrangements in advance.</p> <p>Where costs would exceed £200, 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 Governing Body would be required.</p>
GIFTS AND HOSPITALITY		
<p>Gifts received from tenants and external sources including prizes from our contractor or suppliers.</p>	<p>Yes (not exceeding a value of £25)</p>	<p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights) and prizes from our contractors and suppliers can be accepted if:</p> <ul style="list-style-type: none"> • the value does not exceed £25 • you do not receive more than one such gift from the same source in a 12 month period • you record receipt of the gift in the register <p>You should not normally accept other gifts and should decline any gifts with a value of more than £25 unless to do 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 fund raising 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 once from the same source within a 12 month period.</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</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"> • Retirement

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<ul style="list-style-type: none"> • Leaving the organisation • Long service awards <p>These must be recorded in the relevant register and the value of such gifts will not normally exceed £25 except where specifically allowed for in the terms and conditions of employment, or our own separate policy.</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.</p>
Hospitality associated with our business and that of its partners	Yes (when not exceeding a value of £25)	<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 £25 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 £25, unless you have prior approval from the CE or Chair. 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 Chief Executive.</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"> • Approval is gained from the Chief Executive prior to 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 separate policy that sets out our approach to supporting other charities.</p>
PROCURING GOODS/SERVICES		
Sale of a property under Right To Buy to someone affected by this policy	Yes	This is permitted with no requirement to declare in the register. The normal process for valuation and sale should be followed and our normal policy would be applied.
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, as long as:</p> <ul style="list-style-type: none"> • Our policy and procedures are followed • Neither the prospective purchaser or anyone connected to them is involved in any way or in any part of the allocation process • The sale is approved by the Governing Body • 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 closely 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 Governing Body 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</p>

		register along with details of the process followed.
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)	This cannot be permitted in almost all cases. 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: <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 upon conclusion
The purchase of goods/services from our suppliers/contractors by one of our people	Yes	This should be avoided where it is reasonable to do so but otherwise is permitted if the procedure in Section 4 is followed
The purchase of goods/services (such as factoring and small repairs) from the Association or our Subsidiary	Yes	This is permitted where the services are available to the general public and provided the procedure in Section 4 is followed
Use of Care & Repair services provided by the Association or our Subsidiary	Yes	This is permitted where the services are provided on the same terms as they would be to any other member of the public and they are recorded in the register.

SCHEDULE OF REVISIONS		
DATE	REVISION No.	DETAILS
18/09/2017	1.1	Amendments made to point 3 to correspond with new SFHA Code of Conduct (September 2017). "Appendix A" amended to correspond with monetary values in Gifts & Hospitality Policy.
21/11/2019	1.1	ADDED: Cover page – new SHR Standards of Governance and Financial Management
21/11/2019	1.1	ADDED: NEW Point 5 - GENERAL DATA PROTECTION REGULATIONS

