



# Rutherglen & Cambuslang Housing Association

## Entitlements, Payments & Benefits Policy

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<b>Purpose</b>	To maximise use of resources available to accurately monitor and recover the arrears due.
<b>Regulatory Requirements</b>	<p><b>Standard 1:</b> The Governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users</p> <p><b>Standard 2:</b> 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><b>Standard 4:</b> The Governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.</p> <p><b>Standard 5:</b> The RSL conducts its affairs with honesty and integrity</p>
<b>Regulatory Guidance</b>	<b>Standard 5.4</b> 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><b>Date Approved by Management Board:</b> 16 December 2025</p> <p><b>Date of Next Review:</b> December 2028</p>

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# **RCHA Entitlements, Payments, and Benefits Policy**

## **1. Introduction**

### **Who the Policy Affects**

1.1 This policy is aimed at:

- All members of our Board and of the Board of any of our subsidiaries
- Everyone who works or volunteers 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 our Regulators, partners and funders. We must ensure that our organisation upholds its reputation and that of the sector. Our people cannot benefit inappropriately from their connection to us.

1.4 This policy describes the entitlements, payments and 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 Our Rules require that we have a policy dealing with payments and benefits<sup>1</sup>. 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>2</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.

[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 Trustees<sup>3</sup> 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 (or is seen to benefit) improperly or inappropriately from their involvement with us, but also that they are not unfairly disadvantaged. We expect our people to

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<sup>1</sup> SFHA (2020) [Charitable Model Rules, Rule 38](#)

<sup>2</sup> Scottish Housing Regulator (February 2019) [Regulatory Framework Standard 5.4](#)

<sup>3</sup> Office of the Scottish Charity Regulator (2017) [Guidance for Charity Trustees](#)

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<sup>4</sup>.
- 1.9 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 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 may 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 Maintenance
  - Aids & Adaptations
  - Procurement
  - Training & Development
  - Expenses
  - Recruitment & Selection

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<sup>4</sup> Code of Conduct for [Board] Members; Code of Conduct for Staff

- Acquisitions & Disposals

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 and /or our activities. You will be required to maintain the accuracy of the interests you declare and to confirm annually that your entry is accurate and up to date.
- 2.2 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 and play no part in the discussion. Our Rules require that any Board member who has an interest in a matter that is being considered withdraws from all discussions and plays no part in decision-making<sup>5</sup>
- 2.3 The Codes of Conduct which our Board and staff are required to uphold contain requirements about Declaring Interests that you should comply with at all times.
- 2.4 An annual report will be made to our Board on the entitlements, payments, benefits that have been recorded in the Register(s) by our people.
- 2.5 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.
  - Receipt of care or support services from us.

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<sup>5</sup> SFHA (2020) [Charitable Model Rules 2020 Rule 38](#)

- 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 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.

2.6 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.

### **Entitlements, Payments and Benefits**

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

2.8 As one of our people, you potentially could be offered benefits over and above that to which you are 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.

- 2.9 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.
- 2.10 As we contribute to the economy(ies) of the area(s) 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.
- 2.11 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.
- 2.12 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 Someone ‘closely connected’ to you includes members of your household, family members and other relatives and your friends.
- 3.2 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 16. If you are in any doubt about whether or not a declaration is required, you should consult the Chair, CEO or, for staff, your line manager.

**Table A**

Group	Required Response
<p><b>1. Members of your household</b></p> <p>This includes:</p> <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>	<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><b>2. Partner, Relatives and friends</b></p> <p>This includes:</p> <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>	<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>



## **What You Need To Consider**

3.3 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). 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)
- Involvement in the management of any company or supplier with which we do business (or are considering doing business with)
- 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 RCHA or any of its subsidiaries

## **4. Use of Our Contractors & Suppliers**

4.1 In order to help us maintain our excellent reputation, where possible you should avoid using the organisation's contractors/suppliers for your own personal purposes. This is included at Appendix B

4.2 We recognise that there could be certain circumstances where it might not be possible for you to avoid the use of all the contractors/suppliers on this list, such as where market conditions in your local area make it difficult to obtain a reasonable selection of potential contractors or suppliers. Under such circumstances you could be permitted to use those contractors/suppliers outlined at Appendix B, provided you are able to demonstrate that you

received no preferential treatment in terms of price, quality or any other aspect of service delivery due to your involvement with us.

- 4.3 Approval to use those contractors listed at Appendix B is at the discretion of the approving officer (in accordance with our scheme of delegation). In order to be granted approval, you will be required to demonstrate that there is no reasonable alternative contractor/supplier providing the service required in your local area, 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)
- 4.4 If you are looking to purchase goods or services from any contractor/supplier on this list then you must make a declaration in the register outlining:
- That you have received approval from the appropriate approving officer prior to the commencement of works
  - That you received no preferential treatment in terms of service or cost (which you will be required to demonstrate through quotations and receipts).
  - Where you inadvertently use a contractor on the list at Appendix B in an emergency situation, you must notify the approving officer as quickly as possible thereafter and enter an appropriate declaration in the register.
- 4.5 Any contractor/supplier not included on the list at Appendix B can be used without the need for any declaration/further action. Appendix B represents the majority of the contractors/suppliers that we use, but does not include any of our contractors/suppliers that:
- Only provide services of a small value (e.g. local window cleaners or sandwich shops) or
  - Have such a large national or local standing that no favour could ever realistically be gained (e.g. Amazon, utilities, BT, banks or national chains)
- 4.6 The approving officer will have an appropriate level of seniority, in accordance with our scheme of delegation. In making their decision, the approving officer will consider the level of potential reputational risk or any potential conflicts of interest that may arise by granting approval and, if granting approval, consider the steps required to mitigate against future conflicts of interest. This includes ensuring that the individual is not involved in any transactions with or decisions about the contractor/supplier in question on behalf of the organisation.
- 4.7 RCHA will maintain a clear audit trail of every approval to use any of our contractors listed at Appendix B. The total number of our people to use contractors and suppliers, including the reasons for approval, and confirmation that no advantage was gained due to an individual's role within the organisation - will be formally reported annually to our Board.

## **5. Review**

5.1 Our Rules require the Board to set our policy on payments and benefits and keep it under review. This policy has been approved by our Board and is based on the Model published by the SFHA. It is consistent with the requirements of our Codes of Conduct for Board members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements.

5.2 This policy was adopted by our Board on 16 December 2025 It will be reviewed not later than December 2028

## 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 <b>Board</b> for their role as a <b>Board</b> member, in accordance with the terms of their letter of appointment	No	

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<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 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 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"> <li>• It arises directly from a decision to terminate the employee's contract of employment</li> <li>• Payment is approved by the <b>Board</b></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</li> </ul>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>be awarded by a court or 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 and</li> <li>• You have no direct or indirect line management or supervision responsibility for the post and</li> <li>• The offer of employment complies with our policy and is approved by the Chair &amp; CEO and</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 <b>Board</b> or to anyone who is related to a member of the <b>Board</b>	No	This cannot be permitted.
Appointment of one of our staff members to the <b>Board</b>	No	This cannot be permitted in accordance with the Rules of the organisation.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
Nominations to join the <b>Board</b> 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	<p>This is permitted as long as</p> <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 Governing Body 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 Maintenance Manager. 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 of a	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.

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.		<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.
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	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.  Residential conferences are important in ensuring that our people have the necessary skills, knowledge and experience to make an effective contribution to our activities.
Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business.	Yes (where total cost does not exceed £500)	The <b>Board</b> must approve attendance in advance, and will only do so if: <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 <b>Board</b> would be required.</p>
<b>GIFTS AND HOSPITALITY</b>		
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, flowers) 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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<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 – Donation will be made and items raffled off</li> <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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
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><b>You should not accept invitations with a value that is greater than £60, unless you have prior approval from the Board. 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 or Chair</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 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 separate 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> </ul>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<ul style="list-style-type: none"> <li>It is declared and recorded in the register within five days of the missives being concluded confirming the process followed.</li> </ul>
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 Governing Body 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>
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"> <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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
The purchase of goods/services from our suppliers/contractors by one of our people	Yes	This should normally be avoided, and will only be potentially permitted if the procedure identified in Section 4 is followed

## Appendix B

### Schedule of Registers to be Maintained by RSLs

*This Schedule is intended to assist RSLs in ensuring that all necessary Registers are established and maintained. It is not intended to be prescriptive and is not an exhaustive list of all registers you must hold. Some RSLs may choose to maintain additional Registers or to hold combined Registers (e.g. Assets and Disposals; Interests, Entitlements, Benefits, Gifts and Hospitality). Care should be taken to ensure that the title and purpose of Registers is clear to avoid any confusion over what/where something should be recorded.*

Register	Content	Notes	Required by	Public <sup>6</sup>
Shareholding Members (Full)	Names and addresses of all shareholding members; their e-mail addresses; the share held and its value; date name entered and, where appropriate) date membership ceased; statement of any other property held by the member in the association		Rule 64	No
Shareholding Members (Abbreviated)	Names and addresses of all shareholding members; their e-mail addresses; date name entered and, where appropriate) date membership ceased	Whilst the register is not publicly available, Rule 81 states: <i>“Any Member or person having a financial interest in the Association can inspect their own account. They may also inspect the second copy of the Register of Members</i>	Rule 65	No

<sup>6</sup> Maybe on request at RSL office; this column indicates whether there is a requirement (statutory, regulatory or other) to make publicly available – with particular reference to the Publication Scheme requirements under FOI. Associations may choose to give access to other Registers

Register	Content	Notes	Required by	Public <sup>6</sup>
		<i>which shall be made available to them for inspection within 7 days of the request of a Member or eligible person. The books must be available for inspection at the place they are kept at all reasonable hours. The Committee may set conditions for inspecting the books."</i>		
Office Bearers	Names and addresses; positions held; date appointed to and left office	Regulatory Framework requires the publication (via website) of the membership of the Governing Body, Office Bearers and length of service.  Please note that whilst Rule 64 requires addresses to be kept on the register, there is no requirement to make these public.	Rule 64 Regulatory Framework	Yes (not addresses)
Interests	Register of all declarations of interest made by GBMs and Staff	Should be maintained only for current GBMs and current staff but records should be retained for 12 months in case of any retrospective application and to ensure that any decisions taken in the twelve months following a resignation/ retiral are informed by interests declared.	Regulatory Framework  EPB  Annual Report required by EPB 4.7	Yes

Register	Content	Notes	Required by	Public <sup>6</sup>
		The Chair should make an annual report to the GB to confirm that the register has been reviewed by him/her.		
Entitlements, Payments, Benefits, Gifts and Hospitality	Register of all payments and benefits; gifts offered, received and declined by GBMs and staff	<p>Include all/any payments and benefits received that are NOT covered by the terms of a contract of employment or policy (e.g. expenses).</p> <p>Include description and estimated value as well as donor and recipient; where relevant, also record destination of gift (e.g. retained by individual; shared with colleagues; included in Christmas raffle)</p> <p>Include description and estimated value as well as donor and recipient; where relevant, also record destination of gift (e.g. retained by individual; shared with colleagues; included in Christmas raffle)</p>	Regulatory Framework  EPB	No
Use of Seal	Schedule of all occasions when Seal is used; purpose of use and names of those signing		Rule 63	No
Complaints	Register of all complaints received; outcomes and any consequent action	Individuals should not be identified; complaints listed according to category e.g. repairs, ASB, allocations	Complaints Policy/ Procedure	No



Register	Content	Notes	Required by	Public <sup>6</sup>
Assets	Schedule of all moveable and heritable property owned by the association or in which it has an interest: description; date of purchase; value (book and insurance); date and method of disposal (where relevant)		Financial Regulations Audit Requirement	No
Title Deeds	List of title deeds; brief description and insurance value; details of where deeds retained		Asset Management Policy  Financial Regulations  Insurance Requirement	No
Disposals	Schedule of all asset disposals; authorisation to dispose (including from SHR); value; direction of disposal and application of proceeds		Audit Requirement  Asset Management Policy  Financial Regulations	No

Register	Content	Notes	Required by	Public <sup>6</sup>
Loans	Part 1: Schedule of all loans outstanding to <b>be repaid</b> by the association; capital borrowed; security provided; lender; repayment term Part 2: Schedule of any loans made <b>by</b> the association		Rule 65	No
Contracts	Schedule of all contracts entered into by the association; purpose; value; duration		Procurement Reform (Scotland) Act	Yes
Fraud	Schedule of all instances of detected/attempted fraud	Available for review by external and internal auditors; reported quarterly to Audit Committee/GB	Financial Regulations	No
Accidents	Schedule of all reported accidents; details of reports made to HSE (where required) and outcomes		HSE	No

## List of Contractors

Contractors				
Company	Trade	Contract Name	Contact No.1	Contact No.2
PROPERTY ONE LTD	Multi-trade		0141 774 8600	
TIMETRA	Multi-trade		01698 746091	
MP GROUP UK LTD	Multi-trade		0141 237 1970	
IB CONTRACTS.LTD	Multi-trade		0141 328 9546	
WRIGHTKERR	Multi-trade		0141 816 9100	
CRD PROPERTY REMOVATIONS	Multi-trade		0141 611 7318	
PROPERTY ONE LTD	Joiner		0141 774 8600	
RJK BS LTD	Joiner		0141 763 0410	
TIMETRA LTD	Joiner		01698 746091	
DAVID MITCHELL PLASTERING & BUILDING	Joiner		0141 440 2269	
IB CONTRACTS.LTD	Joiner		0141 328 9546	
RS CONTRACTORS ltd	Joiner		:07342800705	
CRD PROPERTY RENOVATIONS	Joiner		0141 611 7318	
DM INTEGRATED	Joiner		0800 955 1333	
SOUTH LANARKSHIRE GLAZING COMPANY	Joiner		:01355900010	
RJK BS LTD	Plumber		0141 763 0410	
DAVID MITCHELL PLASTERING & BUILDING	Plumber		0141 440 2269	
H CLARKE & SONS LTD MECHANICAL SERVICES	Plumber			
JOHN FULTON PLUMBERS LTD	Plumber		0141 636 5500	
LOCHLIE CONSTRUCTION LTD	Plumber		0141 212 0000	
HEAT TECH MAINTENANCE LTD	Plumber		07831 650710	
JAMES FREW LTD	Plumber		01294 468 113	

TR AITCHISON	Electrical		0141 647 5200	
MAGNUS ELECTRICAL SERVICES	Electrical		0141 949 1114	
POWER DISTRIBUTION CONTRACTING LTD	Electrical		01698 889 733	
FORTRESS SECURITY ALARMS LTD	Electrical		01563 533222	
WRIGHTKERR ALL TRADES	Electrical		0141 816 9100	
RS CONTRACTORS LTD	Electrical		:07342800705	
A ALEXANDERS AND SON ELECTRICAL LTD	Electrical		0141 632 0868	
MP GROUP UK LTD	Electrical		0141 237 1970	
H CLARKE & SONS LTD MECHANICAL SERVICES	Electrical			
AK GRAHAM ELECTRICS LTD	Electrical		07850835517	
GWL - ELECTRICAL LTD	Electrical		0141375 7692	
DM INTEGRATED LTD	Electrical		0800 955 1333	
TV & SATELLITE	Electrical			
SOUND SERVICE	Electrical		0141 445 3553	
TELEVISUAL SERVICES	Electrical		07810588228	
MRM ELECTRICAL SERVICES	Electrical		08000432547	
GOLDSEAL			0141 550 1900	
ASBESTOS SERVICES			01355 222 525	
DAMADA			01355 271999	
EXCEL	Pest Control		0141 889 2999	
MARTEC			0141 646 5220	
PARKHEAD WELDING			0141 556 2739	
M&S FIRE PROTECTION			0141 647 2121	
CLYDE CONTRACTS			01416489254	
ARGON			ainsley@argontech.co.uk	
H20			0141 646 0020	

FORSYTH GLAZING			0141 554 0011	
CAMERON IND CLEANING			07747634620	
AMBER FIRE DOORS			07359 075866	
ID CANT			0141 552 2312	
T4S				
MCN			01698 828606	

## Appendix C

### Entitlements, Payments & Benefits Policy

#### Declaration of Interest Form

Under the Association's Code of Conduct , Board/Staff members must declare any personal or other external interests that may:

- come into conflict with the business of the Association and/or
- influence their decisions regarding the Association's business
- compromise their position as a Board Member

The Association's Rules require that is done on annual basis. Please answer the following questions as fully as possible. If you have any doubt about any of your responses, please refer to the guidance notes attached or speak to the CEO or Chair.

#### Personal Interests

Do you have:	yes	no
A close connection to an employee or former employee of the Association?		
A close connection with another Management Board Member or former Governing Body Member Member of the Association?		

Are you, or any person listed in the Section 2 of the attached Guidance Notes:	yes	no
A tenant of Rutherglen & Cambuslang Housing Association?		
On the Association's waiting list for housing/re-housing?		
Reside in a property factored by the Association and receive any factoring services from Rutherglen & Cambuslang Housing Association?		
Receiving any other services from the Association?		
A member or director of any other voluntary or community organisations that are active in the Association areas of operation?		
Doing paid or voluntary work with any organisation that does, or is likely to do, business with the Association?		
Involved with any organisation that may seek to do business with the Association or may seek services and/or funding and/or support from the Association? ( <b>note 1</b> )		
An elected member of South Lanarkshire Council or on the Committee/ Board of another registered social landlord?		
A member of any political, campaigning or other organisations/groups whose interests and/or activities that may conflict with those of the Association?		
Involved in any unresolved disputes and/or legal action with the Association?		
Involved with any organisations which the Association may seek funding or other forms of financial support ( <b>note 2</b> )		

If you have answered YES to any of the questions overleaf, please provide a brief description/statement on each declared interest. Please include details such as;

- who the interest applies to (e.g. yourself, other)
- if other, the relationship to you
- the company/organisation the interest involves
- the nature of involvement (e.g. member of the board, employed by the company etc)
- if the interest is current or, if not when it ended

**Details of Interest:**

**Register of Interests**

Please note that the Association is required to maintain a Register of Declared Interests and that this will be made publicly available on the Association's website and newsletters and from the office upon request.

If there is any reason why any of the information you have given in this Declaration of Interests should be regarded as confidential, please give details.

I confirm that;

- I have read the guidance notes on completing the Declaration of Interest
- To the best of my knowledge the information given is accurate
- I will update my declaration if there any changes or additions to the interest I have declared
- I will immediately inform the Chair or CEO if I purchase any good or services from any supplier/contractor on the Association's approved list.
- I will immediately advise if I receive any gifts or hospitality that need to be declared under the Association's policies

Signed \_\_\_\_\_

Name (print)\_\_\_\_\_

Date\_\_\_\_\_

## **Guidance on Declaring & Managing Personal Interests**

### **Notes:**

Note 1 : Involvement includes;

- any financial or business interest
- full or part ownership of a company
- directorship or senior manager of a company
- ownership or control of more than 2% share in a company

Note 2 : Does not include where the involvement is as a customer for example where you

have an account with a bank or mortgage with a lender

### **1. Examples of interests that must be declared**

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 (by you or someone to whom you are closely connected) of which we are the landlord.

- Occupancy or ownership of a property (by you or someone to whom you 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 you purchase goods or services from us.
- If you purchase 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 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.



If you are not sure whether a certain matter needs to be declared, you should speak to the Chair or CEO. If doubt remains, the advice would always be to declare the matter.

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.

## 2. Definition of 'close connection'

Someone 'closely connected' to you includes family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or in law.

The following table outlines those who you should consider when declaring interests:

Group	Required Response
<p><b>1. Members of your household</b> This includes:</p> <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>	<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><b>2. Partner, Relatives and friends</b> This includes:</p> <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>	<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>

If you become aware of any action or involvement relating to **anyone** in the table then you should declare and manage this as soon as possible.

However, we recognise that you will not always be closely acquainted with or in regular contact with all of the people listed and we do not expect you to go to unreasonable lengths to identify actions or involvement that are covered by this policy.

Please note, we do expect you to be familiar with the actions of members of your household (Group 1) and of any other people listed in the table above with whom you are closely associated and/or in regular contact and you must take steps to identify, declare and manage these.

**You are not expected to be aware of the actions of people in groups 2 and 3 that you do not have a close association and/or regular contact with.** We do not expect you to research into the employment, business interests and other activities of all persons with whom you are closely connected.

In relation to 2.3 – 2.6 above, when considering your actions you should do so from the point of view of a reasonable and objective observer.

### **3.0 Keeping the Register Up to Date**

You must keep your entry in the Register of Interests up to date, add any new interests as soon as they arise, and amend existing interests as soon as any change takes effect.

A situation may arise where you are invited to be present at a meeting where a matter in which you have a personal (or a personal business or financial) interest is discussed.

In such cases you must inform the meeting Chair at the start of the meeting, or as soon as you become aware that this is the case.

You would then be required to leave the meeting for the duration of the particular item.

If in any doubt, you should ask the meeting Chair or another senior person present for guidance. This applies to both internal and external meetings that you attend as a member of our Governing Body/staff member.

## Appendix D



### Use of Contractor /Supplier Declaration Board Member

Please Note : Under the Association's Entitlement, Payments & Benefits policy, Board Members are required, wherever possible, to avoid using contractor or suppliers used by the Association.

However, it is recognised that there could be certain circumstances where it might not be possible to avoid the use of a contractor on the Association's list possible. Under such circumstances use of contractors or suppliers used by the Association maybe permitted provided it can be demonstrated that;

- No preferential treatment in terms, quality or any other aspect of service delivery due to involvement with the Association
- There is no reasonable alternative suitable contractor or suppliers in the local that provides the service required

Quotations and/or receipts may be required.

Where a contractor or supplier used by the Association is inadvertently used (e.g. in an emergency), the CEO or Chair must be notified as quickly as possible and an appropriate declaration registered.

Name.....

Address.....

.....

#### Declaration:

I confirm that I have read and understood the requirements and obligations on me under the Association's Entitlement, Payments & Benefits Policy.

I also confirm that I have not received any advantage or preferential in terms, quality or any other aspect of service delivery due to involvement with the Association and/or that there is no reasonable alternative suitable contractor or suppliers in the local that provides the service required.

Signed.....

Date .....

I confirm that I **require/or have already used\*** the services of the following contractor/supplier who is used by the Association.

Contractor/Supplier Name	
Address	
Work/Supply required/provided	
Date work to be carried out/carried out	
Value/Estimated Value	
Reason for use of contractor supplier	

Quotes Attached	
Receipts Attached	
There are no quotes and/or receipts are attached, please explain why:	

## Appendix E



### Use of Contractor/Supplier Declaration Form - Staff

Please Note : Under the Association's Entitlement, Payments & Benefits Policy, staff are required, wherever possible, to avoid using contractor or suppliers used by the Association.

However, it is recognised that there could be certain circumstances where it might not be possible to avoid the use of a contractor on the Association's list possible. Under such circumstances use of contractors or suppliers used by the Association maybe permitted provided it can be demonstrated that;

- No preferential treatment in terms, quality or any other aspect of service delivery due to involvement with the Association
- There is no reasonable alternative suitable contractor or suppliers in the local that provides the service required

Quotations and/or receipts may be required.

Where a contractor or supplier used by the Association is inadvertently used (e.g. in an emergency), the Director or Chair must be notified as quickly as possible and an appropriate declaration registered.

**Name**.....

**Job Title** .....

**Department**.....

#### **Declaration:**

I confirm that I have read and understood the requirements and obligations on me under the Association's Entitlement, Payments & Benefits Policy.

I also confirm that I have not received any advantage or preferential in terms, quality or any other aspect of service delivery due to involvement with the Association and/or that there is no reasonable alternative suitable contractor or suppliers in the local that provides the service required.

**Signed**.....

**Date** .....

I confirm that I **require/or have already used\*** the services of the following contractor/supplier who is used by the Association.

Contractor/Supplier Name	
Address	
Work/Supply required/provided	
Date work to be carried out/carried out	
Value/Estimated Value	
Reason for use of contractor supplier	

Quotes Attached	
Receipts Attached	
There are no quotes and/or receipts are attached, please explain why:	


## Appendix F

### Entitlements, Payments & Benefits Policy

Board & Staff approval record sheet for use of RCHA's contractors/suppliers  
Request for approval form

Date of Request	
Reference Number	
Name & Job Title/Position on Management Board of Individual Making Request	
Details of Request	
Name & Job Title/Position on Management Board of Individual Giving Approval	
Outcome	Approved/Rejected : Date
Reasons for Rejection, if applicable	
Date Applicant Informed of Outcome	
Date Entered into Register	
Signature:	

## Appendix G

	<b>Rutherglen &amp; Cambuslang Housing Association</b>
<b>Entitlements, Payments &amp; Benefits Policy – Equality Impact Assessment</b>	

Is the policy/proposal new or a revision	Review	Person(s) responsible for assessment	GCSO
<b>1. Briefly describe the aims, objectives purpose of the policy/proposal</b>	<p>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. 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.</p> <p>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. We must ensure there is no justifiable public perception of impropriety.</p> <p>As we are a Scottish Charity, all of our Governing Body Members must also</p>		



	<p>ensure that they comply with the Office of the Scottish Charity Regulator (OSCR) guidance to Charity Trustees and charity legislation.</p> <p>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.</p>								
<b>2. Who is intended to benefit from the policy/proposal (e.g. applicants, tenants, staff, contractors)</b>				Governing Body members and Governing Body members of our Subsidiary Everyone who works for us Tenants, Customers and other stakeholders					
<b>3. What outcomes are wanted from the policy/proposal (e.g. benefits to customers)</b>				This policy will ensure that our interests are managed and how to register and declare interests, entitlements, payments and benefits.					
<b>4. Which protected characteristic could be affected by the policy/proposal? (tick all that apply)</b>									
Age	✓	Disability	✓	Marriage & Civil Partnership	✓	Pregnancy/Maternity	✓	Race	✓
Religion or Belief	✓	Gender	✓	Gender Reassignment	✓	Sexual Orientation	✓		
<b>5. If the policy/proposal is not relevant to any of the protected characteristics listed in part 4, state why and end the process here.</b>									
Applicable to all, no particular group will be adversely affected by this Policy									

6. Describe the likely positive or negative impact(s) the policy/proposal could have on the groups identified in part 4	Positive Impact(s)	Negative Impact(s)
7. What actions are required to address the impacts arising from this assessment? (this might include collecting additional information, data, putting monitoring in place, specific actions to mitigate negative impacts)		

Signature of assessor	<i>Teresa Gallagher</i>
Job Title of Assessor	Governance & Corporate Services Officer
Date EIA was completed	08/12/2025