



## GROUP ENTITLEMENTS, PAYMENTS AND BENEFITS POLICY

POLICY IMPLEMENTATION CHECKLIST	
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## 1 Introduction

- 1.1 This policy is based on the Scottish Federation of Housing Association's (SFHA) Model Policy on Entitlements, Payments and Benefits, which the Scottish Housing Regulator (SHR) has confirmed meets its regulatory requirements. Section 4 of the policy has however been amended from the model to reflect the Group's specific approach to the use of contractors and suppliers by our governing body members and employees.

### Who the Policy Affects

- 1.2 This policy is aimed at:
- Caledonia and Cordale's Governing Body Members
  - Everyone who works for Caledonia Housing Association, whether directly or otherwise, or who volunteers for Caledonia or Cordale Housing Associations
- 1.3 For the remainder of this policy the above will be referred to as "our people".

### About this Policy

- 1.4 Caledonia and Cordale Housing Associations ("the Group") are Registered Social Landlords and Scottish Charities. The Group is part of a sector that has a strong reputation for integrity and accountability to the people it exists to help and to its' Regulators, partners and funders. As an organisation, the Group must ensure that it upholds its' reputation and that of the sector. Our people cannot benefit inappropriately from their connection with the organisation.
- 1.5 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 the Group has in place to ensure that the requirements of this policy are observed.
- 1.6 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.
- 1.7 As both Caledonia and Cordale Housing Associations are Scottish Charities, all Group 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.
- 1.8 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 act in good faith, and in applying the terms of the policy we will always take this into account.
- 1.9 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>.

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<sup>1</sup> Rule 38

Scottish Housing Regulatory Framework (February 2019) Regulatory Framework Standard 5.4

<sup>3</sup> Office of the Scottish Charity Regulator (2017) Guidance For Charity Trustees

<sup>4</sup> Code of Conduct for Governing Body Members, Code of Conduct for Staff

- 1.10 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 benefits, payments or entitlements you should:
- 1.10.1 Caledonia Housing Association - consult with the Chair or the Director of Finance and Governance if you are a governing body member or with your Line Manager if you are a member of staff.
- 1.10.2 Cordale Housing Association – consult with the Chair or the Head of Front Line Services if you are a governing body member.

#### What this Policy Covers

- 1.11 This policy covers:
- Managing Your Interests
    - Registering and Declaring Interests
    - Entitlements, Payments and 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

- 1.12 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.
- 1.13 You are also required to be familiar with and observe the terms of our Anti-Bribery and Fraud policies. We prohibit any attempt to induce the organisation or our people to offer preferential services or business terms and we will at all times comply with the Bribery Act 2010.
- 1.14 Our policies relating to the following are also relevant to this document and must be complied with at all times:
- Allocations
  - Conflict of Interest
  - Standing Orders
  - Financial Regulations
  - Delegated Authority
  - Repairs and Maintenance
  - Stage 3 Adaptations
  - Procurement
  - Training
  - Expenses
  - Recruitment & Selection
  - Decoration Allowance

- 1.15 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 interest in any matter that is being discussed or considered 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 Governing Body 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 that our Governing Body Members and staff are required to uphold contains requirements about Declaring Interests that you should comply with at all times.
- 2.4 An annual report will be made to the Governing Bodies within the Group on the entitlements, payments, benefits that have been recorded in the Register 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 declare.
- Tenancy of a property of which either Caledonia or Cordale Housing Association is the landlord.
  - Occupancy or ownership of a property that is factored or received property related services from either Caledonia or Cordale Housing Association.
  - Receipt of 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 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).

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<sup>5</sup> Rule 38.2

- 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 you 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 economies of the areas 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 list the entitlements, payments and benefits that fall under this policy and states:

- Which could be permitted by the Group
- Which will never be permitted by the Group
- Which you require to declare in the Register of Interests
- Any other further requirements the Group 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 below. If you are in any doubt about whether or not a declaration is required, you should consult the Chair or CEO (for Governing Body Members) or your line manager (for staff).

Table A

<u>Group</u>	<u>Required Response</u>
<p>1. <u>Members of Your Household</u></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>2. <u>Partner, Relatives and Friends</u></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/involvements by those **to whom you are closely connected** that you should consider, declare and manage as per our expectations outlined in Table A above (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 the Governing Bodies of Caledonia or Cordale Housing Associations
- 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 & Suppliers**

- 4.1 The Group has a well-earned reputation for integrity and honesty and is committed to acting with transparency, honesty and propriety and avoiding any public perception of improper conduct. In order to help us maintain our excellent reputation it is important that our people do not misuse their position to gain benefits that would not be available to other members of the public.
- 4.2 At the same time we do not want to see staff and governing body members face unreasonable restrictions which put them at a disadvantage compared to other members of the public. Where in your personal/home life you as one of our people need a service from a supplier or contractor linked to the Group, if it causes no disadvantage or inconvenience to you to avoid using that contractor then we would ask that such use is indeed avoided; however the Group does not wish to unreasonably restrict your choice of contractor.
- 4.3 It is extremely important that, where you wish to use one of the contractors linked to the Group, you take particular steps which will help protect both you and the Group. A staff or governing body member should only utilise the services of suppliers and contractors (listed at Appendix B for Caledonia, Appendix C for Cordale) for their own personal needs if:
- The normal commercial rates are paid for this service and no preferential treatment, financial or otherwise, is received.
  - You report your proposed course of action to your departmental director (for staff team members) or the respective Chair (for governing body members) before committing to use the contractor in question and follow any advice offered. In emergency situations you should comply with this policy as soon as is practically possible.
  - You make a written declaration (see Appendix F) as soon as practical that you have not received any advantage or preferential treatment (financial or otherwise) from the contractor or supplier arising out of their connection to the Association that you are connected with: written quotes should be provided where these would normally be sought for the type of work in question, and in ALL cases receipts should be provided.
  - You record the transaction or agreement as soon as practical in the Association's Register of Payments and Benefits and keep the entry up to date.
- 4.4 Examples of situations that might arise in this context include buying goods or services from a connected business such as a main reactive maintenance contractor or the company(s) responsible for carrying out planned and cyclical maintenance programmes for the Group (where the provisions of section 4.5 below apply).
- 4.5 Appendix B lists the suppliers and contractors for Caledonia Housing Association and Appendix C those relating to Cordale Housing Association, to whom this policy applies. This details the majority of the contractors/suppliers that we currently use and/or are likely to use. It does not include any of our contractors/suppliers that:
- Only provide services of a small value (e.g. local window cleaners or sandwich shops), with value based on expenditure of less than £3000 for Caledonia and less than £1000 for Cordale in the previous financial year; or

- Have such a large national or local standing that no favour could ever realistically be gained (e.g. utilities, Amazon, BT, banks or national chains)

Any contractor/supplier not included on the list at Appendices B or C can be used without the need for any specific action.

- 4.6 In the event of becoming involved in a dispute with the Group arising out of your proposed or actual use of a contractor or supplier used by the Group (see section 4.5 above), you must notify the Chair (for governing body members) or the Chief Executive (for staff members) and withdraw from any discussions relating to the service and / or work involved.
- 4.7 In the case of governing body members, if the dispute cannot be resolved through the normal complaints procedure and you remain dissatisfied, you should resign from the governing body in order to pursue the complaint independently.
- 4.8 Separate Register of Payment and Benefit documents will be maintained for Caledonia and Cordale Housing Associations. These will be reviewed in April and October of each year by the respective Chairs in the Group. Information on entitlements, payments and benefits recorded in the registers will also be provided in the Annual Governance Reports to the respective governing bodies in June of each year.
- 4.9 More generally, if using the services of the Caledonia Group's contractors/suppliers our people should not:
- Make any reference to their role/position in the Group during private commercial/business negotiations and should not respond to any attempt by a supplier/contractor to engage with him/her on the subject
  - Approach suppliers or contractors through the Group
  - Avail of preferential rates negotiated by the Group or draw on Group contracts or framework agreements.

Consideration should be given by our people on each occasion as to the level of potential reputational risk or any potential conflicts of interest that may arise from their possible use of the contractors/suppliers used by the Group.

- 4.10 Over and above these actions, steps will be taken by the Group to advise our contractors and suppliers on the Group's policy relating to the use of contractors and suppliers by our people and on entitlements, payments and benefits more generally. Information will also be provided on the Group's Whistleblowing Policy to raise their awareness of how they could report any inappropriate approach from one of our people relating to a transaction. Periodic reviews of the implementation of the Entitlements, Payments and Benefits Policy will also be undertaken as part of the Group's internal audit programme.

## **5 Review**

- 5.1 Both Caledonia and Cordale Housing Association's Rules require the Governing Bodies to set our policy on payments and benefits and keep it under review. This policy has been approved by the Group's Governing Bodies 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 regulatory requirements.
- 5.2 This policy will be subject to review on a three yearly cycle.

## 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 and health benefit 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 governing body for their role as a governing body member, in accordance with the terms of their letter of appointment	Caledonia HA – Yes  Cordale HA - No	Payments must be in accordance with the Charities and Trustee Investment (Scotland) Act 2005 and any associated guidance from the Office of the Scottish Charity Regulator.  Payments must be recorded in the register of interests within five days of the appointment being confirmed and the register must be kept up to date.
<p>All payments made in accordance with the terms of our expenses policy including:</p> <ul style="list-style-type: none"> <li>• payment of permitted out of pocket expenses</li> <li>• reimbursement of travel costs</li> </ul>	Yes	Entitlements in connection with your role as one of our people as set out in our expenses-related policies 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.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
Redundancy or Voluntary severance payment to an employee	Yes	<p>We can make redundancy payments to an employee in line with the Redundancy Policy and terms of their contract.</p> <p>or</p> <p>We can make a voluntary severance payment to an employee which is outside the above terms 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 Governing Body</li> <li>• That the total sum of the non-contractual payment and benefit does not exceed, in the opinion of our employment adviser, the total cost of a successful application by the employee to a Court or Tribunal (including the likely level of compensation that might be awarded by a court or tribunal and associated costs to the organisation to participate in the tribunal)</li> <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 Chief Executive Officer or Director of People 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 to someone who is, or has been in the last twelve months, a member of our Governing Body or to anyone who is related to a member of the Governing Body	No	This cannot be permitted.
Appointment of one of our staff members (or a close relative of a staff member) to the Governing Body	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 Governing Body from people who are connected to a serving governing body member.	Caledonia HA – No Cordale HA – Yes	This cannot be permitted in accordance with the Rules of the organisation.  This can be permitted in accordance with the Rules of the organisation.
Awards or prizes as part of employee engagement and recognition practices.	Yes	This is permitted provided: <ul style="list-style-type: none"> <li>Any gift or prize does not exceed the value of £50</li> </ul> The authorisation of a gift or prize will be approved by the Chief Executive or Director of People
<b>OUR PEOPLE AS TENANTS OR SERVICE USERS</b>		
The offer of a tenancy or lease in any of the Group's properties to one of our people or to someone closely connected to them.	Yes	This is permitted provided: <ul style="list-style-type: none"> <li>it is in accordance with the relevant Common Allocations Policy (Caledonia) or the Shared Allocations Policy (Cordale) and</li> <li>Neither the applicant or anyone connected to the applicant is involved in any way or in any part of the allocation process and</li> <li>The offer is approved by the Governing Body in advance and</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	Repairs carried out in accordance with our policy do not need to be recorded.  Adaptations must comply with our policy and be approved by Executive Management Team. 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.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<p>Where one of our people (or someone connected to one of our people) is a tenant and receives payment of a decoration allowance, tenant reward/incentive as part of an agreed scheme or prize.</p>	<p>Yes</p>	<p>Payment of decoration allowances or incentive/reward payments must be made in accordance with our policies and procedures and recorded in the register within five days of receipt.</p> <p>Prizes or awards in competitions open to all tenants in the same community (e.g. garden competitions) can only be given if the selection process for giving the award/prize has been carried out by someone who is independent. Receipt of the award and the circumstances surrounding it must be recorded in the register within five days of receipt.</p>
<b>TRAINING AND EVENTS</b>		
<p>Attendance at training events or seminars (e.g. SFHA Conferences) or openings/similar events hosted by other RSLs</p>	<p>Yes</p>	<p>There is no requirement to declare and record in the register of interests.</p>
<p>The organisation paying for accommodation in connection with attendance at relevant conferences or events that you are attending on behalf of or in connection with your role with us or our subsidiaries</p>	<p>Yes</p>	<p>Accommodation that is part of a conference or training package does not need to be recorded in the register, but attendance will be recorded on the relevant individual training plan.</p> <p>Residential conferences are important in ensuring that our people have the necessary skills, knowledge and experience to make an effective contribution to our activities.</p>
<p>Attendance by you and your invited guest(s) at events to mark awards, achievements or other significant milestones relevant to our business.</p>	<p>Yes (where total cost does not exceed £500 per person)</p>	<p>The Governing Body must approve attendance prior, and will only do so if:</p> <ul style="list-style-type: none"> <li>• The organisation or one of our people (because of their role with us) has been nominated for an award; or</li> <li>• attendance is in recognition of achievement of or in pursuit of appropriate business development; or</li> <li>• we can demonstrate that attendance or participation is directly related to furthering our aims and objectives.</li> </ul> <p>Where we ask you to represent us at such an event and when guests are invited, 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>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>The total cost should not exceed £500 per person and we will make all arrangements in advance.</p> <p>Where costs would exceed £500, you and your invited guests 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</p>	<p>Yes (not exceeding a value of £60)</p>	<p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights) can be accepted on behalf of the Association 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>• the procedure for recording and registering gifts is followed</li> </ul> <p>You should not normally accept other gifts and should decline any gifts with a value of more than £60 unless to do so would cause offence or otherwise damage our reputation. In these cases you must:</p> <ul style="list-style-type: none"> <li>• Advise the donor that the gift will be donated to charity or will form part of our annual charity fund raising activities</li> <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 of cash, cheques or gift vouchers</p>	<p>No</p>	<p>Gifts of cash, cheques or gift vouchers are not permitted in any circumstances.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<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 (organisation) £25 (external source))</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"> <li>• Family events (e.g. marriage, milestone birthday, birth of a child),</li> <li>• Retirement</li> <li>• Leaving the organisation</li> </ul> <p>Gifts from external sources to our people can be permitted in cases where it is to mark a special occasion or significant event such as retirement. These must be recorded in the relevant register and the value of such gifts will not exceed £100 (organisation) and £25 (external source).</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>
<p>Special Occasions or Events</p>	<p>Yes (not exceeding £50 per person)</p>	<p>These are occasions or events that Group members may wish to commemorate such as:</p> <ul style="list-style-type: none"> <li>• key milestones in the organisation's development</li> <li>• opening of a new housing development</li> <li>• receiving an award</li> <li>• Christmas</li> <li>• key anniversary of a housing development</li> </ul> <p>This is not an exhaustive list but gives examples of instances when Group members will organise commemorative or ceremonial events.</p>
<p>Hospitality associated with our business and that of its partners</p>	<p>Yes (when not exceeding a value of £100)</p>	<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 £100 is permitted but must be recorded in the register, along with an estimation of the value of hospitality received, within five days of attendance. In this case, the reason for acceptance must also be included in the register and countersigned by the respective Chair (for governing body members) or Chief Executive (for staff members).</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		You should not accept invitations with a value that is greater than £100, unless you have prior approval from the Governing Body. 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.
Providing Gifts and Hospitality to Third Parties	Yes (when not exceeding a value of £50)	On occasion we may give gifts or offer hospitality to individuals or an organisation such as tenants or contractors. Caledonia recognises however that anything other than occasional gifts or hospitality can give rise to justifiable concern and suspicion. As such the offering of gifts and hospitality will be kept to a minimum. Gifts or hospitality to a third party up to the value of £50 can be authorised by the Chief Executive. Where the value exceeds these amounts, or where the hospitality involves inviting guests to attend special occasions or events and occasions to mark awards, achievements, or other significant milestones relative to the business as detailed previously, then the prior approval of the relevant governing body within the Group will be sought.
Sponsorship and Donations made by Group members.	Yes	This is permitted provided the guidance attached at Appendix E is followed.
<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	This is permitted, provided: <ul style="list-style-type: none"> <li>• Our policy and procedures are followed</li> <li>• The prospective purchaser should play no part in the processing of the transaction by the organisation</li> <li>• The offer is approved by the Governing Body in advance</li> <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)	This is not permitted in almost all circumstances. We could only consider this where: <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> </ul>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<ul style="list-style-type: none"> <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>
The purchase of goods/services from our suppliers/contractors by one of our people	Yes	This should normally be avoided and will only be permitted if the procedure identified in Section 4 is followed.

**CALEDONIA HOUSING ASSOCIATION - SUPPLIERS LIST (>£3000)**

Aareon UK Limited  
Access UK Ltd  
Advanced Stairlifts Limited  
Aitken Laboratories  
Alba Facilities Services Ltd  
Allan Munro Construction  
Allen Gordon & Co  
Alternative Heat Ltd  
AM Fire & Security  
AO Cumbernauld  
Apex Hotels Ltd  
Arjo UK Limited  
Arneil Johnston  
AS Homes (Scotland) Limited  
ASA Recruitment  
Baker Tilly  
Balhousie Care Ltd  
Bancon Construction  
Bayne Stevenson Associates  
Bell Decorating Group  
Boxfish  
Bracewell Stirling Consulting  
Braisby Roofing Ltd  
Brakes  
Brig Environmental  
Brightsolid Online Technology  
Brown & Wallace  
Brownriggs  
Building Solutions (Perth) Ltd  
Bunzl  
Business Stream  
C Hanlon Limited  
Caltech Ltd  
Cameron Cleaning Services  
Campbell Tickell  
Campfitzroy Ltd  
Campion Homes  
Canada Life  
Care & Independence Ltd  
Care-Ability Healthcare Ltd  
CDMM UK  
Chatham Financial  
Chris Cole & Associates  
Chubb Community Care  
Chubb Fire & Security

Chubb Fire & Security Ltd  
City Gate Construction Scotland Ltd  
City Technical Services  
Classic Lifts Scotland Ltd  
Coast To Coast  
Colco Plumbing & Heating  
Commissioning Operation & Training Services  
Contract Building Services  
Countrywide Grounds Maintenance  
Crombie Plumbing & Heating  
Cullross Limited  
Curtins Consulting Ltd  
D G Lindsay (Butchers)  
D Harris Services  
Dalton Demolitions Ltd  
David Adamson & Partner  
Decision Time  
Diamond Air Conditioning  
Direct Ecology Limited  
Douglas McPhee Tree Maintenance  
DPBS Developments Ltd  
DS McG Ltd  
DTS Trading Inc Ltd  
Dulux Decorator Centres  
Dundas Building Co Ltd  
Easiaccess  
ECD Architects Ltd  
Ellis Whittam Ltd  
ENER-G  
Energy Tech  
Everwarm Ltd  
Ewing Somerville Partners  
Firstcall Trade Services  
Gas and Gas Ltd  
Gazprom  
GB Social Housing Plc  
Glen Construction  
Global Office Supplies Ltd  
Graham Environmental  
Hamish Bell Associates  
Harper MacLeod  
H B Rutherford & Co Ltd  
Henderson Loggie  
Hillcrest Futures  
Hillhead Housing Association  
Housing Insight Ltd  
HSR Ltd Receipts  
Invu Services Limited

Ista Energy Solutions  
J & E Shepherd  
J D Minto  
James Frew Limited  
Jane Systems  
JLA Ltd  
JLT Specialty Ltd  
JS McColl Decorators  
KDM Architects  
KDQ LTD  
Kick ICT Group Ltd  
Kingdom Clear Ltd  
Kingsmills Hotel  
Kleen-All Leather  
Knowledge Partnership  
Landscapes And Contracts  
Langstane Press  
Logie Glazing & Building  
M3 Housing Limited  
Maintenance Controls & Engineering Scotland Ltd  
Marsh Ltd  
Martin Aitken Associates  
Maximum Networks  
McCash & Hunter  
McCroreys Removals  
McLaren Murdoch  
Mears Limited  
Meldrum Construction  
Miller Group Services  
MITIE Property Services  
MTC Media  
My Eco Solution  
NBM Construction  
Newton Property Management  
Nicoll & Stewart  
NLC General Fund  
Novus Property Solutions  
Nurture Landscapes Ltd  
Ogilvie Homes Ltd  
Orbis Protect Ltd  
PD Scotland Ltd  
People Asset Management  
Perceptive Communicators  
Perth Locksmiths  
PME (Dundee) Ltd  
Princes Street Car Parks  
Proclean (2017) Ltd  
Protective Wear Supplies

Prudential  
Puffin Energy  
QAPM Ltd  
QTS Contracts Ltd  
Ralph A Ogg & Partners Ltd  
Real Asset Management  
Record UK Ltd  
Renewable Energy  
Robertson Partnership Homes  
Rock Building  
Ross & Liddell Ltd  
Rossco Properties  
Rowan Consultancy  
RS HILL  
RSM  
RTM Plumbing & Heating  
SaaSam UK Ltd  
Scotshield Ltd  
Scott Brothers  
Search  
Securitay Limited  
Select Facilities  
SFHA Ltd  
SGN Connections Ltd  
Shackleton Technologies  
SHARE  
Sidey Solutions Ltd  
Simon Community Scotland  
Simple Approach  
Skyguard Ltd  
Softcat Ltd  
SP Distribution Plc  
SSE Contracting  
Stannah Lift Services  
Stewart Milne  
Stewart Milne Homes North  
Stirling Park  
Summit Facilities Services  
Swallowfield Smallholdings  
Swiftclean UK Ltd  
T&H Cox Ltd T/A Rainbow  
Tay Electric Ltd  
T C Young  
Tenants Information Services  
TGP Glasgow  
The Building Surveying Company  
The McDougall Group  
Thorntons

TPT Retirement Solutions  
Trayndale Garden Services  
Tullitec Limited  
Tulloch Homes Express  
UDMS Ltd  
UK Mail  
Upper Dens Landscaping Ltd  
Urban Union Ltd  
Vacancy Filler Ltd  
Valuation Office Agency  
Video Watchman Systems  
W Munro (Rehab) Ltd  
Walker Fire (UK)  
Webster Developments Ltd  
Wellwood Leslie  
Whittons Flooring Ltd  
William Lambie Landscape  
WRB Gas (Contracts) Ltd  
Wylie Duff And Sons

**CORDALE HOUSING ASSOCIATION - SUPPLIERS LIST (>£1000)**

Alba Facilities Services Ltd  
Baker Tilly  
Boxfish  
Bracewell Stirling Consulting  
Brican Fabrications  
Brownriggs  
Business Stream  
C Hanlon Limited  
Carman Centre  
CC North Ltd  
Chubb Community Care  
Chubb Fire & Security  
Chubb Fire & Security Ltd  
City Technical Services  
G3 Consulting Engineers  
Gazprom  
Harper MacLeod  
H B Rutherford & Co Ltd  
I.A.S Landscape Management  
Initial Washroom Hygiene  
Iron Mountain  
James Frew Limited  
JLT Specialty Ltd  
JS McColl (Painting  
Contractors)  
Kleen-All Leather  
Minster Services (Glasgow)  
Ltd  
PD Scotland Ltd  
Pestguard Services  
QTS Contracts Ltd  
Rentokil Pest Control  
RSM  
SE Training  
Select Facilities  
Stannah  
The McDougall Group  
Trayndale Garden Services  
WGM Engineering Ltd  
WRB Gas (Contracts) Ltd  
Wylie Duff And Sons

## **Donations and Sponsorship Guidance**

### **Caledonia Housing Association**

Annually the Management Board will set a budget for sponsorship and donations. Sponsorship or donations up to the value of £1,000 can be authorised by the Functional Director. Where the value exceeds £1,000, the prior approval of the Executive Management Team will be sought. All donations and sponsorships granted must be in line with all relevant Association and Caledonia Group policies.

Caledonia will seek to sponsor voluntary organisations such as clubs or community groups in the local communities where we have properties and where the wider community will benefit from sponsorship of the club or community group. Sponsorship may be in the form of money, purchase of equipment or advertisement. Caledonia will accept no liability for the upkeep, disposal or replacement of any equipment which has been grant funded.

Caledonia will not normally consider requests for ongoing sponsorship or financial support. Grant and sponsorship requests therefore will normally be limited to a maximum of one per three year period to individual organisations.

Applications will not be considered from voluntary organisations whose purpose is political, or where the request is to be applied for political purposes; where the grant would be applied for purposes which Caledonia deems to be non-charitable in nature; or where Caledonia considers the organisation not to be viable or unlikely to be operating in the short term future.

There are circumstances in which Caledonia may wish to sponsor an event such as a conference, or seminar or other item such as a calendar, information leaflet, newsletter or similar publication. Such opportunities will be considered on a case by case basis, and in accordance with the delegated authority arrangements outlined above.

Similarly, Caledonia will also consider sponsorship of individuals taking part in a fundraising event, where this is for a recognised charity, and donations to recognised charities, local groups or community groups. Again, such requests will be considered on a case by case basis, and in accordance with the delegated authority arrangements outlined above.

When considering grant and sponsorship requests, the voluntary organisation making the request, where deemed relevant by the Association, will be asked to provide any further supporting information. It may also be asked to attend a meeting. This will allow Caledonia to satisfy itself where required of the details of the proposal. Caledonia where possible will also be able to signpost or assist in providing further information on alternative funding sources. Any opportunities for good publicity for Caledonia and/or the voluntary group will also be considered.

Records of grants and sponsorships approved will be included in the Sponsorship and Donations Register. Arrangements will be made for the Chair to review the register twice a year. An overview of grants and sponsorships made will be provided in the Annual Governance report presented to the Management Board.

## **Cordale Housing Association**

Annually the Management Committee will set a budget for sponsorship and donations. Sponsorship or donations up to the value of £300 can be authorised by the Functional Director. Where the value exceeds £300, the prior approval of the Executive Management Team will be sought. All donations and sponsorships granted must be in line with all relevant Association and Caledonia Group policies.

The Association will seek to sponsor voluntary organisations such as local clubs or community groups in the local communities where they have properties and where the wider community will benefit from sponsorship of the club or community group. Sponsorship may be in the form of money, purchase of equipment or advertisement. In order to ensure that money granted is used for legitimate purposes, the Association where possible and appropriate will directly purchase the goods or services for which the grant is being awarded. However, the Association will accept no liability for the upkeep, disposal or replacement of equipment which has been grant funded.

Grants should only be made where the voluntary organisation demonstrates to the Association's satisfaction that it has tried to secure grant funding from other sources and that the Association's contribution is critical to its business. The Association will not normally consider requests for ongoing sponsorship or financial support. In line with this and to avoid any allegations of regular subsidising of running costs, grant and sponsorship requests will normally be limited to a maximum of one per three year period to individual organisations.

Applications will not be considered from voluntary organisations whose purpose is political, or where the request is to be applied for political purposes; where the grant would be applied for purposes which the Association deems to be non-charitable in nature; or where the Association considers the organisation not to be viable or unlikely to be operating in the short term future.

There are circumstances in which the Association may wish to sponsor an event such as a conference, or seminar or other item such as a calendar, information leaflet, newsletter or similar publication. Such opportunities will be considered on a case by case basis and will require prior approval of the Executive Management Team.

When considering grant and sponsorship requests, the voluntary organisation making the request will be asked to provide any further supporting information. It may also be asked to attend a meeting. This will allow the relevant Association to satisfy itself of the details of the proposal including any accounting for grants spent, and the organisations effort's to find funding from other sources. The Association where possible will also be able to signpost or assist in providing further information on alternative funding sources. If there are any opportunities for good publicity for the Association and/or the voluntary group, this will also be discussed.

Once a grant or sponsorship request has been accepted, Management Committee members will be informed. A record of the grant or sponsorship will be included in the Sponsorship and Donations Register. Arrangements will be made for the Chair of the Association to review the register twice a year. An overview of grants and sponsorships made will be provided in the Annual Governance report presented to the Management Committee.



**USE OF CONTRACTORS & SUPPLIERS**

**DECLARATION FORM**

**Name of Governing Body Member/  
Staff Member:** .....

**Job Title/Position on Governing Body** .....

**Name of Contractor/Supplier Used:** .....

**Description of Work Carried  
Out/Service Provided:** .....

.....

**Date Used** .....

**Reason Used:** .....

.....

.....

**Cost of Work Carried Out/Service  
Provided:** .....

I declare that no financial or other advantage (i.e. quality or any other aspect of service delivery) was secured in relation to this transaction as a result of my involvement with Caledonia Housing Association / Cordale Housing Association \* (delete as appropriate). I have enclosed written quotes (if these were sought given the type of work in question) and copies of receipts relating to the work / service.

Signed: ..... Date: .....