



## GROUP ENTITLEMENTS, PAYMENTS AND BENEFITS POLICY

POLICY IMPLEMENTATION CHECKLIST	
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## 1 Introduction

- 1.1 The previous Payments and Benefits and Schedule 7 policies at Caledonia, Cordale and Bellsmyre Housing Associations were based on Part 1 of the Schedule of the Housing (Scotland) Act 2001. Schedule 7 of this Act outlined principles of good governance that restricted the types of entitlements, payments and benefits that Registered Social Landlords (RSLs) could make to employees, governing body members and their families. This legislation has been superseded and this Group policy ensures continued good governance in this area going forward.
- 1.2 This policy is based on the Scottish Federation of Housing Association's (SFHA) Model Policy on Entitlements, Payments and Benefits, which has been endorsed by the Scottish Housing Regulator (SHR). 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.

### About this Policy

- 1.3 This policy is aimed at all Group governing body members and everyone who works for the Group, whether employed directly or otherwise. For the remainder of this policy, these will be referred to as "our people".
- 1.4 The Caledonia 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. As an organisation, the Caledonia 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 Caledonia Group has in place to ensure that the requirements of this policy are observed.
- 1.6 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>1</sup>. We must ensure there is no justifiable public perception of impropriety.
- 1.7 As the three Associations within the Caledonia Group 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>2</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 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.

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<sup>1</sup> Scottish Housing Regulator Framework (February 2019)<sup>2</sup> Office of the Scottish Charity Regulator (June 2016) Guidance & Good Practice For Charity Trustees Section 2

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- 1.9 Everyone who is affected by this policy, is personally responsible for ensuring that they are familiar with and comply with its terms. When signing the respective Code of Conducts for Staff and Governing Body Members, it will reflect that this policy is being complied with.
- 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, payment 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 and Bellsmyre Housing Association – consult with the Chair or the Head of Front Line Services if you are a governing body member or with the Head of Front Line Services if you are a member of staff.

#### 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:
- Conflict of Interest
  - Standing Orders
  - 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 discussion; you must withdraw from any part of a meeting where the interest arises.
- 2.3 The Code of Conduct also contains a section on Declaring Interests that you should comply with at all times.
- 2.4 An annual report will be made to the Governing Bodies within the Group on the entitlements, payments, benefits that have been recorded in the Register.

### Entitlements, Payments and Benefits

- 2.5 Many of the interests you will be required to declare can be classed as entitlements, payments or benefits.
- 2.6 As one of our people, you potentially could be offered benefits over and above that to which you are contractually entitled, such as gifts or hospitality from external parties. Such offers would be as a direct result of you being one of our people and cannot always be accepted. We require that any such offers are managed and recorded very carefully to ensure the highest levels of probity in our organisation. Our people should not benefit – or be seen to benefit – inappropriately from their involvement with us.
- 2.7 Apart from payments that our people are entitled to by contract, statute or other agreement (e.g. salary, expenses), we will only make a payment to, or accept a payment from, someone affected by this policy in exceptional circumstances. Appendix A explains the payments we can and cannot make in more detail.
- 2.8 As we contribute to the 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.
- 2.9 Some entitlements, payments and benefits we can never permit, and others we have additional requirements or conditions that must be met before we can permit.
- 2.10 Appendix A list the entitlements, payments and benefits that fall under this policy and states:
- Which could be permitted by the Caledonia Group
  - Which will never be permitted by the Caledonia 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 family members and persons who might reasonably be regarded as similar to family members even where there is no relationship by birth or law.
- 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.

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 close friends</li> <li>• Anyone you are dependent upon or who is dependent upon you</li> <li>• Acquaintances (such as neighbours, someone you know socially or business contacts/associates)</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.
- A significant interest in a company or supplier that we do 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.
  - Involvement in the management of any company or supplier with which we do business.
  - 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 within the group or any of their subsidiaries
  - Application to be a tenant or service user of the organisation
  - If they are an existing tenant or service user of the organisation

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

- 4.1 The Caledonia 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 Association in the Group that you are connected to, if it causes no disadvantage or inconvenience to you to avoid using one of that Association's contractors then we would ask that such use is indeed avoided; however the Associations in the Group do 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 Association that you are connected to, you take particular steps which will help protect both you and that Association. A staff or governing body member should only utilise the services of one of that Association's suppliers and contractors (as listed at Appendix B for Caledonia, Appendix C for Cordale and Appendix D for Bellsmyre) 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 Caledonia staff team members), the Head of Front Line Services (for Bellsmyre and Cordale staff team members) or the Chair (for governing body members) as appropriate 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 practicably possible.

- You make a written declaration (see Appendix F) as soon as practicable 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 practicable 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 Association concerned (where the provisions of section 4.5 below apply).

4.5 Appendix B lists the suppliers and contractors for Caledonia Housing Association, Appendix C those relating to Cordale Housing Association and D Bellsmyre 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 and Bellsmyre 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, BT, banks or national chains)

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

4.6 In the event of becoming involved in a dispute with the Association that you are connected with arising out of your proposed or actual use of a contractor or supplier used by the Association (see section 4.5 above), you must notify the Chair (for governing body members) or the Chief Executive (for Caledonia staff members) or the Director of Front Line Services (for Cordale and Bellsmyre 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, Cordale and Bellsmyre Housing Associations. These will be reviewed in April and October of each year at Caledonia by the Chair and Chief Executive and at Cordale and Bellsmyre by the Chair and the Director of Front Line Services. Information on entitlements, payments and benefits recorded in the three registers will also be provided in the Annual Governance Reports to the respective governing bodies in June of each year.

4.9 More generally, when using the services of the Caledonia Group's contractors/suppliers our people should not:

- Make any reference to their role/position in the relevant Association in 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 Associations in the Group
- Avail of preferential rates negotiated by the Associations in the Group or draw on Group contracts or framework agreements.

Consideration however 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 Associations in the Group.

- 4.10 Over and above these actions, steps will be taken by the Associations in 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 Our Rules require the Group's 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 their 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	No	
<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.
Redundancy or Voluntary severance payment to an employee	Yes	<p>We can make redundancy payments to an employee in line with terms of the Redundancy Policy (Caledonia) or the Statement of Terms and Conditions of Employment (Cordale and Bellsmyre)</p> <p>or</p> <p>We can make a voluntary severance payment to an employee which is outside the above terms provided:</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<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 Governing Body 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	<p>This cannot be permitted for the people detailed in Group1 and Group 2 at Section 3.1 above (People Connected to You section) as regards people to whom Governing Body members are closely associated with.</p> <p>This can be permitted for the people detailed in Group 3 at Section 3.1 above (People Connected to You section) as regards people to whom Governing Body members are closely associated with 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> </ul>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<ul style="list-style-type: none"> <li>The offer of employment complies with our policy and is approved by the Governing Body 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>
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.
Nominations to join the Governing Body from people who are connected to a serving member.	Yes	This can be permitted in accordance with the Rules of the organisation.
Awards or prizes as part of Group employee engagement and recognition practices.	Yes	<p>This is permitted provided:</p> <ul style="list-style-type: none"> <li>Any gift or prize does not exceed the value of £50</li> </ul> <p>The authorisation of a gift or prize will be approved by the Chief Executive or Director of People</p>
<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	<p>This is permitted provided:</p> <ul style="list-style-type: none"> <li>it is in accordance with the relevant Common Allocations Policy (Caledonia) or the published Allocations Policy (Cordale and Bellsmyre) 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	<p>Repairs carried out in accordance with our policy do not need to be recorded.</p> <p>Adaptations must comply with our policy and be approved by the relevant Executive Management Team member or Operational Management Team member. The adaptation should be recorded in the register of interests within five days of approval.</p> <p>Improvements must be carried out as part of an approved programme and in accordance with our policy. The person affected should declare their</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		interest if/when the programme is being discussed and the improvement recorded in the register of interests within five days of completion
Where one of our people (or someone connected to one of our people) is a tenant and receives payment of a decoration allowance, tenant reward/incentive as part of an agreed scheme or prize.	Yes	<p>Payment of decoration allowances or incentive/reward payments must be made 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>		
Attendance at training events or seminars (e.g. SFHA Conferences) or openings/similar events hosted by other RSLs	Yes	There is no requirement to declare and record in the register of interests.
The organisation paying for accommodation in connection with attendance at relevant conferences or events that you are attending on behalf of or in connection with your role with us or our subsidiaries	Yes	<p>Accommodation that is part of a conference or training package does not need to be recorded in the register, but attendance will be recorded on the relevant individual training plan.</p> <p>Residential conferences are important in ensuring that our people have the necessary skills, knowledge and experience to make an effective contribution to our activities.</p>
Attendance by you and your invited guest(s) at events to mark awards, achievements or other significant milestones relevant to our business.	Yes (where not exceeding £500)	<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</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>costs (including travel, accommodation and the costs of attendance at the event) within five days of attendance.</p> <p>The total cost should not exceed £500 per person and we will make all arrangements in advance.</p> <p>Where costs would exceed £500, you 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>
<b>GIFTS AND HOSPITALITY</b>		
Gifts received from tenants and external sources	Yes (not exceeding a value of £50)	<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 value does not exceed £50</li> <li>• no more than one such gift from the same source is received 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 £50 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>Gifts from the same source should not be regularly accepted and never more than once within a 12 month period.</p> <p>You should also record any offers that you decline and the reasons for this, in the register within five days.</p>
Gifts of cash, cheques or gift vouchers	No	Gifts of cash, cheques or gift vouchers are not permitted in any circumstances.
Gifts given from us to one of our people or received by one of our people from external sources to mark special occasions.	Yes (not exceeding a value of:	<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>• Retirement</li> </ul>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
	£50 (organisation) £25 (external source)	<ul style="list-style-type: none"> <li>• Long service of a governing body member (deemed to be 2 full terms in line with our Rules and Standing Orders (i.e. 6 years).</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.</p> <p>These must be recorded in the relevant register and the value of such gifts will not exceed £50 (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>
Special Occasions or Events	Yes (not exceeding £50 per person)	<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>
Hospitality associated with our business and that of its partners	Yes (when not exceeding a value of £100)	<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.</p> <p>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.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		In this case, the reason for acceptance must also be included in the register and countersigned at Caledonia by the Chair (for governing body members) or Chief Executive (for staff members); and at Cordale and Bellsmyre by the Chair (for governing body members) or the Area Director (for staff members).
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 a property under Right To Buy to someone affected by this policy	Yes	This is permitted with no requirement to declare in the register. The normal process for valuation and sale should be followed and our normal policy would be applied.
Sale of our interest (whole or part) in a property to someone affected by this policy via LIFT, HomeBuy; Help to Buy or other LCHO scheme	Yes	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> </ul>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<ul style="list-style-type: none"> <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>
The purchase of goods/services from our suppliers/contractors by one of our people	Yes	This should normally be avoided. Further guidance on the Group's approach that should be followed is detailed in Section 4 of the policy.

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

Assist Design Ltd  
Bracewell Stirling  
Cooper Cromar  
R Crerar  
ECD  
John Gilbert  
Grant & Murray  
HTA Architects Ltd  
G H Johnston  
KDM Architects  
McLaren Murdoch & Hamilton  
James F Stephen  
Wellwood Leslie

**Chartered Surveyors**

Acasta Consulting Scotland Ltd  
David Adamson & Partners  
Allied Souter & Jaffrey  
Graham & Sibbald  
Hardies  
KLM Partnership  
Rettie & Co

**Energy Consultants**

Carbon Futures  
Ista Energy Solutions Ltd  
Reheat (Renewable Technologies  
Renewable Energy Consultants Ltd

**Engineering Consultants**

Hawthorne Boyle

**Environmental Consultants**

Aitken Laboratories  
Steve Luker Associates  
Watts Group

**Quantity Surveyors**

Hamish Bell Associates  
Brownriggs  
Brown & Wallace  
John M Duguid & Co  
NBM Consultants  
Ralph Ogg & Partners  
The KLM Partnership

**Structural & Civil Engineers**

Allen Gordon & Co  
Bayne Stevenson Associates  
Curtins  
Elders Consulting Engineers

W A Fairhurst & Partners  
G3 Consulting Engineers  
Harley Haddow  
Lanes Group  
Smart Inspection Services

**Property and Investment Management Service**

Jones Lang La Salle Ltd

**Property Management Services**

Ross & Liddell  
Select Facilities

**Chartered Surveyors**

Ross Quality Control

**Building Contractors**

Barratt North Scotland  
Bellway Homes  
G S Brown Construction  
Campion Homes  
Glen Construction  
GMD Development Services  
Keepmoat Regeneration Ltd  
Alan Munroe Construction  
Ogilvie Homes  
Robertson Homes  
Stewart Milne Construction  
Taylor Shepherd Homes  
Tulloch Homes  
Urban Union  
Webster Construction  
Willmott Dixon Construction Ltd  
WJB Builders & Sons

**Road Construction**

Goodfellow Plant  
W M C Construction (Scotland) Ltd

**Maintenance Contractors**

**Multi-trades Maintenance Work**

ADC Ltd  
Dook Joinery  
Novus Property Solutions  
Mears Group  
QAPM Ltd  
L & D Contracts  
Meldrum Construction Ltd  
John Smith & Son Ltd

**Electricians**

Alliance Electrical Services Ltd  
BFE Electrical Ltd (Portable Appliance Testing)  
P & D Scotland  
Tay Electric

**Painters and Decorators**

Angus Decorating Co Ltd  
Bell Decorators  
Miller-Watt  
Mitie Property Services

**Gas Maintenance Servicing & Auditing**

City Technical Services  
Energy Technical Services  
Kingdom Gas Services  
WRB Gas

**Maintenance of Plumbing, Heating, Hot Water Systems**

Baxi Heating UK Ltd  
Chas Stewart Plumbing & Heating  
C C North Ltd  
Colco  
Crombie Plumbing & Heating  
Fultons  
Inverness Renewables  
James MacGregor & Sons  
LRB Plumbing & Heating  
My Eco Solutions  
Brian Pirie Plumbing & Heating  
QTS  
John Queen & Son  
Queensferry Plumbing and Heating  
R L Rattray  
RJG Plumbing  
RTM Plumbing & Heating  
Stewart Bros Plumbing & Heating

**Installation & Maintenance of Specialist Equipment**

Advanced Stairlifts Ltd  
Alternative Heat Ltd  
Classic Lifts (Scotland) Ltd  
Coast to Coast Disabled Services  
Diamond Air Conditioning Ltd  
Enwa Water Technology UK  
Gas & Gas Ltd  
MoveO Lift Consultants  
On Tap Water & Drainage  
Stannah Lift Services Ltd  
SSE Contracting Ltd  
SSE Energy Solutions Ltd  
Swiftclean UK Ltd  
Switchee  
ThyssenKrupp Elevator UK Ltd  
Video Watchman Systems Ltd

**Maintenance of Private Water and Drainage Systems**

Drain Doctor Plumbing

**M & E Contractors**

Alba Facilities Services Ltd

**Landscape Contractors**

Angus Council  
Countrywide  
IAS Landscape Management & Design Ltd  
Ideverde Scotland  
J D Minto Ltd  
William Lambie Landscape Consultant Ltd  
Nurture  
Resolution  
Trayndale Garden Services  
Upper Dens Landscaping Ltd

**Aerial & Satellite Specialists**

Nicoll & Stewart Ltd

**Cleaning Services**

A J Craig & Sons  
Superior Cleaning

**Glaziers**

Balhousie Glazing  
Sidey Solutions

**Joiners**

J B Gow & Son LLP  
David Martin Joinery Contractor

**Pest Control Services**

Graham Environmental Services

**Preservation Specialists**

John Morrison Timber Preservation Ltd  
Wise Property Care Ltd

**Removals and Storage**

Atholl Removals & Storage  
Huntingtower Removals

**Steeplejacks**

Pendrich Height Services Ltd

**Waste Management**

Brig Environmental  
Shred-it

**Window Cleaners**

Jex Enterprises Ltd t/a Superior Window  
Kingdom Clear

**Suppliers****Care Provider**

Gowrie Care Ltd  
Newcross Healthcare Solutions

**Disability Aid/Medical Equipment Suppliers**

Able Care  
Arjo Huntleigh UK  
Care & Independence  
City of Glasgow Disabled Aid Specialists  
Easiaccess  
Hill Rom Ltd  
Peart Access Ramps Ltd  
Total Hygiene Ltd  
Whiland Disabled Access

**Commercial Furnishings and Equipment**

ABF Workspace Ltd t/a Asplanned  
Knightswood Furniture Productions  
Morris & Spottiswood

**Domestic Furnishings & Equipment**

Chris Craft Window Blinds  
Curtainwise (Scotland) Ltd  
Dulux Decorator Centres  
Glenearn Carpets  
High Performance Door Solutions  
Laws of Perth  
Noble & Bradford  
Perthshire Flooring Ltd  
Bryan Steele Carpets  
Whitton Flooring Ltd

**Energy Suppliers**

Angus Biofuels  
Forever Fuels  
Gazprom  
Our Power  
Puffin Energy  
Scottish & Southern Energy  
Swallowfield Smallholding Ltd  
Switch2 Energy

**Fire Fighting Equipment/Fire Intruder Alarm Supply & Maintenance**

A M Fire & Security Systems  
Chubb Systems Ltd  
Scotshield  
Walker Fire

**General Supplies including PPE & Cleaning Equipment**

Bunzl Cleaning & Hygiene  
JLA Ltd  
Walton Catering Equipment Ltd

**Locksmiths**

Perth Locksmiths

**Office Equipment Suppliers**

**Franking Machines**

Neopost  
Pitney Bowes

**Printers**

Lets Talk Print  
H B Rutherford & Co Ltd  
Winter & Simpson Print

**Promotional Gifts**

Everything Branded  
Yes Gifts Ltd

**Stationery**

Office Depot UK Ltd  
Office Team Ltd

**Telecoms & Warden Call Systems**

BT  
Maximum Group  
O2 (UK) Ltd  
Social Telecoms  
Tynetec Division of Legrand Electric Ltd

**Finance****External Audit Services**

RSM

**Financial Consultants**

Ashworth Black  
JCRA  
Murja Ltd  
Prudential Trustee Co Ltd  
J C Rathbone Associates

**Insurance Services**

Canada Life  
JLT Speciality Ltd  
Protector Forsikring  
Ten Insurance Services  
THIS Housing

**Internal Audit Services**

Wylie & Bisset

**Lenders**

Bank of Scotland  
G B Social Housing  
HBOS  
Nationwide Building Society

**Pension Providers**

Aviva  
SHAPS

**Corporate Services****Business Management Consultants**

Arneil Johnston

**Debt Recovery**

A A Hutton  
Scott & Co  
Stirling Park

**Legal Services**

Brodies LLP  
Harper McLeod LLP  
TC Young  
Thorntons Law LLP

**Consultancy Services**

Amicus Business Solutions  
Business Cost Consultants  
Business Medical Ltd  
Busy Bees Benefits  
KD Media Ltd  
Knowledge Partnership  
L-M Fire Ltd  
The Rubicon Partnership  
Scottish Housing Network  
Spence & Partners  
Square Solutions Consulting Ltd  
Tender Bids Ltd  
Vistage International UK Ltd  
The Circle CIC

**Event Management**

Big Bright Star  
Red Pepper Events

**Health Benefit Providers**

Simply Health  
Westfield Health

**Health & Safety Services**

Safety Media  
Skyguard

**IT**

Aareon UK Ltd  
Bottomline Technologies  
Brightsolid Online Technology  
Castle Computer Services LTD  
Castleton Technology plc  
Computer Recycling Services Ltd  
Gemalto  
Igel Technology  
Invu Services Ltd  
Housing Insights  
Jane Systems  
Microsoft Financing  
M2 Digital  
M2 Ltd  
M3 Housing  
MTC Media

Real Asset Management  
Shackleton  
Social Telecoms  
Softcat Ltd  
Stanley Security  
Streamtec Ltd  
Team Solutionz  
Ulysses (UDMS) Ltd  
XMA Ltd

**Landlords**

Rossco Properties (Commercial) Ltd

**Letting Agents**

Castlecroft Securities Ltd  
Hillcrest Enterprises Ltd

**Postal Services**

DHL Parcel UK Ltd  
Royal Mail  
UK Mail

**Recruitment Services**

Asa Recruitment  
Aspen People  
Chris Cole & Associates  
H1 Healthcare Solutions Ltd  
Hays Specialist Recruitment Ltd  
Search  
Vacancy Filler Ltd

**Training Providers**

Dundee & Angus College  
Quest Scotland Ltd  
Skillgate  
Socialcare TV  
Social Enterprise Academy

***Last Update: May 2019***

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

Grant Murray Architects Ltd

**Energy Consultants**

Energy Technical Services

**Engineering & Design Consultants**

Atkins Ltd

Ken Boyle Building Design

**Project Management**

NBM Construction Cost Consultants

Space Solutions

**Property and Investment Management Services**

Jones Lang La Salle

**Regeneration Consultants**

Community Links Scotland

**Surveyors**

Martin Aitken Associates

Smart Inspection Services

**Demolition Contractor**

CEP Demolition

**Maintenance Contractors****All Trades Maintenance Contractors**

MITIE Property Services

P & D Scotland

Select Facilities

WSS Electrical

**Painters and Decorators**

Bell Decorating Group Ltd

**Fencing**

DAS Contracts

**IT Hardware Repairs**

M2 Technical Services

**Maintenance of Plumbing, Heating & Hot Water Systems**

BRB Ltd

James Frew Ltd

**Pest Control Services**

West Dunbartonshire Council Pest Control

Rentokil Pest Control

**Installation & Maintenance of Specialist Equipment**

Chubb Community Care  
Stannah Stairlift Services Ltd

**Installation & Maintenance of Specialist Equipment**

Schindler Lifts

**Landscape Contractors**

IAS Landscape Management  
Trayndale Garden Services Ltd

**Cleaning Services**

Cannon Hygiene  
Kleen-All  
Minster Cleaning Services

**Care Facilities**

Carman Care

**Car Park Management**

Smart Parking Ltd

**Suppliers**

**Catering Equipment Supplier**

James Scott & Sons

**Disability Aid Suppliers**

Able Care

**Energy Suppliers**

Fuel Genie  
Gazprom Energy  
OPUS Energy  
Scottish Gas  
Scottish & Southern

**Fire Fighting Equipment/Fire Intruder Alarm Supply & Maintenance**

Chubb Fire & Security

**Furnishings and Equipment**

B & Q  
H & K  
Newton Security Doors

**Playground Equipment**

Jupiter Play & Leisure

**Workwear**

Arco

**Office Equipment Suppliers**

**Franking Machine Leasing**

Francotyp Postalia

**Photocopier Leasing**

M2

**Printers**

Print Studio (Scotland)  
H B Rutherford & Co Ltd

**Stationery**

Lyreco UK Ltd

**Telecoms**

Adept Telecom  
EE Ltd  
Virgin Media

**Finance**

**External Audit Services**

RSM UK Audit LLP

**Corporate Services**

**Consultants**

Employers in Voluntary Housing  
Knowledge Partnership

**Debt Recovery**

Walker Love

**Event Management**

K D Media

**IT**

SDM  
Texthelp

**Legal Services**

T C Young  
Thorntons WS  
Harper MacLeod

**Personnel and Human Resource Management Services**

Cole Advertising & Design  
Hays Specialist Recruitment Ltd  
Staff Finders

**Postal Services**

Royal Mail  
UK Mail

**Records Management**

Iron Mountain

***Last Update: May 2019***

**BELLSMYRE HOUSING ASSOCIATION - SUPPLIERS LIST (>£1000)****Building Consultants****Consultants**

Martin Aitken Associates  
Energy Technical Services  
JMP  
IAS Landscape Management  
Nbm Construction Cost Consultants

**Surveyors**

Brown & Wallace  
Smart Inspection Services  
NWH Enterprises (EPC)  
G3 Structural Engineers

**Maintenance Contractors****All Trades Maintenance Contractors**

City Gate Construction  
Select Facilities  
McGills

**Asbestos Surveys Removal**

Abate Asbestos Surveys  
Enviraz (Scotland) Ltd

**Blacksmiths**

Brican Fabrications

**Cleaning Services**

Cleanscene  
Minster Cleaning Services

**Drainage Specialists**

I & D Cant

**Electricians**

Donald Crowe  
BRB Electrical Ltd

**Environmental Services**

Wm Tracey Ltd

**Facilities Management**

Turner Facilities Management

**Glaziers**

Sidey Ltd  
DCL Joinery

**Landscape Maintenance**  
Trayndale Garden Services

**Locksmith**  
Keys Galore

**Maintenance of Plumbing, Heating & Hot Water Systems**  
Gas Sure  
James Frew Ltd

**Painters and Decorators**  
Bell Decorating Group

**Pest Control**  
Pest Guard Services

**Roofers**  
Marley

**Security (Sytex)**  
Property Security Solutions

**TV Engineers**  
TV Local (Scotland)

**Suppliers**

**Installation & Maintenance of Specialist Equipment**  
Envirovent

**Energy Suppliers**  
Scottish Power  
Southern Electric

**Flooring**  
Ferguson Flooring

**Furnishings and Equipment**  
Newton Security Doors

**Plant Hire**  
Mather Hire

**Plumbing and Hardware Suppliers**  
Graham  
LSK Supplies Ltd

**Skip Hire**  
Tracey Skip Hire

**Timber Merchants**

Rembrand Timber

**Office Equipment Suppliers**

**Franking Machine Leasing**

Pitney Bowes

**Printers**

SW Print Studio Scotland

**Stationery**

GOA Office Supplies

**Finance**

RSM UK Audit LLP

**Corporate Services**

**Consultants**

Employers in Voluntary Housing

Knowledge Partnership

**IT**

Igel Technology

M2 Technical Services

Maximum Group

Shackleton

Social Telecoms

Stratiis

Text Help

**Legal Services**

T C Young

Harper MacLeod

**Recruitment**

Staff Finders

Hays Recruitment

**Training**

SHARE

***Last Update: May 2019***

## **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 Chief Executive. Where the value exceeds £1,000, the prior approval of the Management Board 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 for Caledonia's Management Board in the Annual Governance report presented to the Committee.

## **Cordale and Bellsmyre Housing Associations**

Annually the Management Committees will set a budget for sponsorship and donations. Sponsorship or donations up to the value of £300 can be made and will require the prior approval of the Head of Front Line Services in consultation with the appropriate Chair. All donations and sponsorships granted must be in line with all relevant Association and Caledonia Group policies.

The Associations 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 Associations where possible and appropriate will directly purchase the goods or services for which the grant is being awarded. However, the Associations 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 relevant 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 Associations 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 involved 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 Associations 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 Head of Front Line Services in consultation with the relevant Chair.

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 of the relevant Association will be informed. A record of the grant or sponsorship will be included in the Sponsorship and Donations Register for that Association. Arrangements will be made for the Chair of each Association to review their respective register twice a year. An overview of grants and sponsorships made will be provided in the Annual Governance report presented to each Management Committee.



**USE OF CONTRACTORS & SUPPLIERS**

**DECLARATION FORM**

**Name of Board / Committee / Staff Member:** .....

**Job Title/Position on Board / Committee** .....

**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 / Bellsmyre 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: .....