



ENTITLEMENTS, PAYMENTS AND BENEFITS POLICY

POLICY NO. 50

Date Reviewed:	April 2026
Date of Next Review:	April 2029
Regulatory Standards of Governance and Financial Management	Regulatory Standard: 1 The Governing Body leads and directs the RSL to achieve good outcomes for its tenants and other service users. Guidance: 1.2, 1.6, 1.7 Regulatory Standard: 5 The RSL conducts its affairs with honesty and integrity Guidance: 5.1, 5.4, 5.7

1. Introduction

Who the Policy Affects?

1.1 This policy is aimed at:

- All members of our Board of Management
- Everyone who works or volunteers for us

1.2 For the remainder of this policy the above will be referred to as “our people.”

Why we have This Policy

1.3 We are a Registered Social Landlord (RSL) and a Scottish Charity. We are part of a sector that has a strong reputation for integrity and accountability: to the people we exist to help, and to our Regulators, partners and funders. We must ensure that our organisation upholds its reputation and that of the sector. We have to ensure that our people cannot benefit or be seen to benefit inappropriately from their connection to us. Equally, we must protect our people from unjustified criticism and ensure that, wherever possible, no one is unfairly disadvantaged by their connection to us.

1.4 This policy describes the entitlements, payments and benefits that our people are able to receive. It also describes what is not permitted (and why) and the arrangements that we have in place to ensure that we are transparent and accountable in how we comply with the requirements of this policy and our regulators.

1.5 Our Rules require that we have a policy dealing with payments and benefits¹. 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 propriety². We must ensure there is no justifiable public perception of impropriety. This policy is based on the SFHA's Model Entitlements Payments and Benefits Policy, which the SHR have confirmed meets their regulatory requirements.

¹ SFHA (2020) [Charitable Model Rules, Rule 38.1](#) “ The Committee shall set and periodically review its policy on payments and benefits. If a person is a Member, employee of the Association or serves on the Committee or any sub-committee he/she must not receive any payment or benefit unless it is permitted by the policy. In making any payment or conferring any benefit, the Association shall act at all times with transparency, honesty and propriety

² Scottish Housing Regulator (February 2024) [Regulatory Framework Standard 5.4](#)

- 1.6 As we are a Scottish Charity, all of our Governing Body Members must also ensure that they comply with the Office of the Scottish Charity Regulator (OSCR) guidance to Charity Trustees³ and charity legislation.
- 1.7 This Policy is intended to be a practical document that supports us in meeting all of the above requirements, ensuring that none of our people benefit (or are 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.
- 1.8 As someone who is affected by this policy, you are personally responsible for ensuring that you are familiar with and comply with its terms⁴. You are also responsible for ensuring that the Register of Interests is always up to date: declaring interests that are relevant to your role with us is key to the effective implementation of this policy.
- 1.9 At all times, we expect a common-sense approach to be applied to the interpretation and application of this policy. If you are unsure about anything relating to entitlements, payments and benefits you should consult with the Chair or Director (if you are a member of the governing body) or with your line manager (if you are a member of staff).

What this Policy Covers

- 1.10 This policy covers:
- Managing Your Interests
 - Registering and Declaring Interests
 - Entitlements, Payments & Benefits
 - People Connected to You
 - Who Else You Should Consider When Declaring Interests
 - What You Should Consider
 - Use of Our Contractors/Suppliers by Our People

Other Relevant Policies

- 1.11 The Code of Conduct is linked to this policy. Failure to comply with the terms of this policy may be regarded as a breach of the Code of Conduct.
- 1.12 You are also required to be familiar with and observe the terms of our Anti-Bribery and Fraud policy. We prohibit any attempt to induce the organisation

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

⁴ Code of Conduct for [Board/Committee] Members; Code of Conduct for Staff

or our people to offer preferential services or business terms and we will at all times comply with the Bribery Act 2010.

1.13 Our policies relating to the following are also relevant to this document and must be complied with at all times:

- Gifts and Hospitality (the RSL's policy that sets out the circumstances in which gifts and hospitality can/cannot be offered and/or accepted and the relevant values, taking account of the table at Section 6)
- Notifiable Events
- Allocations
- Repairs
- Procurement
- Training
- Expenses
- Recruitment
- Donations

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 Being open about any interests that our people have that are relevant to their role with us is critical to protect our reputation. Our Register of Interests helps to ensure and demonstrate that we conduct our affairs with openness, honesty and integrity. You must record in this register any interests that you or someone connected to you (see Section 3) has, which are relevant to our business and /or our activities. You must maintain the accuracy of the interests you declare and confirm annually that your entry in the Register is accurate and up to date.
- 2.2 Our Rules require that any Board Member who has an interest in a matter that is being considered, withdraws from all discussions and plays no part in decision making⁵. Where you have a personal or business interest in any matter that is being discussed or considered, including at a meeting, (or someone close to you has), you must declare your interest and play no part in the consideration, discussion or decision-making; you must withdraw from any part of a meeting where the interest arises. This requirement does not apply to Board members who are tenants where matters are being considered that

⁵ SFHA (2020) [Charitable Model Rules 2020 Rule 38](#)

relate to policy implementation affecting all or a substantial number of the association's tenants (e.g. rent increases).⁶ The requirement to withdraw relates to matters in which someone affected by this policy has an individual interest, e.g. where they are the tenant of a property that is being considered for exceptional treatment (e.g. association with RAAC) and that a decision will have an individual and personal impact on. If a GBM who has a conflict of interest shares factual information about the matter with the Chair (or any other GBM), outwith the meeting to inform discussion, that must be declared to the meeting and the Chair must ensure that it does not influence the outcome and decision making.

- 2.3 Constitutional Standard 23 requires a RSL to “....have a clear process to identify and address any conflicts of interest”⁷ This policy has been endorsed by the SHR and so complies with regulatory requirements.
- 2.4 The Codes of Conduct which our Board and Staff are required to uphold, contain requirements about declaring interests that you should ensure you are familiar with and comply with at all times.
- 2.5 An annual report will be made to our Board on the entitlements, payments, benefits that have been recorded in the Register(s) by our people.
- 2.6 The following are examples of the kind of interest that you must declare and ensure is managed appropriately. Please note that this list is not exhaustive, and there may be other interests that you should also declare.
 - Tenancy of a property of which we are the landlord.
 - Occupancy or ownership of a property which is factored or receives property related services from us.
 - Receipt of care or support services from us.
 - 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.

⁶ Model Code of Conduct for GBMs (2024) Guidance to C8

⁷ SHR Regulatory Framework (2024) Constitutional Requirements

- If you purchase goods or services from us.
- If you purchase goods or services from one of our contractors or suppliers (see section 4).
- Significant shareholding in a company that we do business with (or are considering doing business with).
- Membership of any other body whose interests and/or activities may directly affect our work or activities.
- Ownership of land or property in our areas of operation. This excludes property for the purpose of your own residential use (i.e. there is no requirement for you to declare any house in which you currently live).
- Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us.

2.7 You should be aware that in some limited circumstances, it is not possible to manage an interest effectively. Examples of an interest that cannot be managed effectively include, but are not limited to:

- Someone who is a member of the Board or closely connected to a Board member cannot apply for or be appointed to a staff role or be engaged to provide goods or services to the RSL.
- Someone who is closely connected to an employee cannot become a member of the GB.
- A senior member of staff or office bearer cannot be an elected member of a local authority which the RSL engages with.

In some circumstances, specific measures will be required to ensure that the probity and reputations of the organisation and its people are safeguarded e.g. by ensuring that all employment is undertaken openly and transparently and without the involvement of anyone connected to any applicant; by ensuring that employees who are connected are not line-managed (directly or indirectly) by the person they are connected to – if this is not possible, the ‘benefit’ (employment offer) cannot be conferred. Confirming that all interests are openly declared at the start of recruitment and procurement processes will assist in avoiding a breach of the policy and/or Code of Conduct or compromise regulatory compliance.

Entitlements, Payments and Benefits

- 2.8 Many of the interests you will be required to declare can be classed as entitlements, payments or benefits.
- 2.9 As one of our people, you are entitled to receive payments and benefits in accordance with the terms of our policies and, for staff, employment contracts. There are occasions where you could be offered benefits over and above what you are entitled to, such as gifts or hospitality from external parties. These offers would be directly because you are 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.
- 2.10 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. The table at Section 6 explains the payments we can and cannot make in more detail.
- 2.11 As we contribute to the economy(ies) of the area(s) we work in and we have commercial and business relationships with many different companies, contractors, suppliers and service providers, you must ensure that we are fully aware of any connection that you or someone you are close to (see section 3) has with any of these businesses or organisations.
- 2.12 There are some entitlements, payments and benefits that we can never permit, and others where we have additional requirements or conditions that must be met, before we can permit.
- 2.13 The table at Section 6 lists the entitlements, payments and benefits that fall under this policy, and states:
- Which can be permitted by the organisation
 - Which will not be permitted by the organisation
 - Which you require to declare in the register of interests
 - Any other further requirements the organisation has before permitting

3. People Connected to You

Who Else You Should Consider When Declaring Interests

- 3.1 As well as considering your own actions, you must be aware of the potential risk created by the actions of people to whom you are **closely connected**.

Someone ‘closely connected’ to you includes members of your household, family members and other relatives and your friends.

- 3.2 Who you should consider, and our expectations of you to identify and declare relevant 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, Director or, for staff, your line manager.

Table A: People who are Closely Connected to one of Our People

Group	Required Response
1. Members of your household This includes: • Anyone who normally lives as part of your household (whether related to you or otherwise) • Those who are part of your household but work or study away from home	We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to promptly identify, declare and manage these.
2. Partner, Relatives and friends This includes: • Your partner (if not part of household) • Your relatives and their partners • Your partner’s close relatives (i.e. parent, child, brother or sister) • Your friends • Anyone you are dependent upon or who is dependent upon you	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. Where you do not have a close connection and/or 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.

What You Need To Consider

3.3 The following are the relevant actions /involvement by those **to whom you are closely connected** that you should consider, declare and manage as per our expectations outlined in Table A (please be aware that this list is not exhaustive or exclusive and that some interests and their potential conflicts cannot be reconciled with the purpose and terms of this policy):

- 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 or supplier 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 or delivery of any contract for the provision of goods or services to us.
- Application for employment with us.
- Application to join our Board of Management.
- Application to be a tenant or service user of Glen Housing Association.

4. Use of Our Contractors & Suppliers

- 4.1 In order to help us maintain our excellent reputation, where possible you should avoid using the organisation's contractors/suppliers for your own personal purposes. We have made a list available to all of our people which outlines the contractors and suppliers that fall under the terms of this policy. This is included at Appendix A.
- 4.2 We recognise that there could be certain circumstances where it might not be possible for you to avoid the use of all the contractors/suppliers on this list, such as where market conditions in your local area make it difficult to obtain a reasonable selection of potential contractors or suppliers. Under such circumstances you could be permitted to use those contractors/suppliers

outlined at Appendix A, provided you are able to demonstrate that your involvement with us did not result in you receiving preferential treatment in terms of price, quality or any other aspect of service delivery.

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

5. Granting a Tenancy

- 5.1 Being one of our people or closely connected to one of our people should not prevent someone from being allocated a tenancy if they are in housing need and the terms of our allocations policy are met. To ensure transparency and probity, consideration of the application/allocation should be carried out completely independently of the individual; their connection to the the RSL must be explicitly identified and the allocation should be approved by a senior officer in accordance with our Scheme of Delegated Authority. The allocation should be registered within FIVE days of being made and reported to the next meeting of the Governing Body, along with confirmation that the necessary management processes were followed.
- 5.2 This is outlined within the entitlements, payments and benefits table at Section 6 of this policy (see 6.12).

6. Entitlements, Payments and Benefits

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
	HUMAN RESOURCES AND RECRUITMENT		
6.1	All entitlements arising from your contract of employment with us or one of our subsidiaries, including (but not restricted to): • payment of salary to staff • access to car or travel loans or salary advances/sacrifices where specified in the employment contract; • pension and/or private health care provided as part of the remuneration package; • performance related pay or bonus awarded in accordance with contractual terms; • books and equipment in connection with employment or training in accordance with agreed policies and/or contractual terms • Reimbursement of professional fees • Access to discounts (or similar) for personal use/purchase of goods/services as part of employment terms/benefits	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.
6.2	Payment to a member of the Board for their role as a Board member, in accordance with the terms of their letter of appointment	No	[Such payments will only be permitted if they are in accordance with the conditions set out

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			in Section 67(3) of the Charities and Trustees Investment (Scotland) Act 2005 ⁸
6.3	All payments made in accordance with the terms of our expenses policy including: • payment of permitted out of pocket expenses • reimbursement of travel costs	Yes	Entitlements in connection with your role as one of our people set out in our expenses policy are always permitted and do not need to be declared provided claims are made in accordance with our procedures.
6.4	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 e.g a loan to support education or training costs). We cannot make any other loans to individuals.
6.5	Redundancy or Voluntary severance payment to an employee	Yes	We can make redundancy payments to an employee in line with terms their contract Or We can make a voluntary severance payment (often referred to as a Settlement Agreement) to an employee which is outside the terms of their contract of employment provided: • It arises directly from a decision to terminate the employee's contract of

⁸ Legislation.Gov.Uk (2005) Charities and Trustees Investment (Scotland) Act 2005 Section 67 (3) available [here](#)

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			employment and is in accordance with the statement of terms and conditions of employment. • Payment is approved by the Board • That the total sum of the non-contractual payment and benefit does not exceed, in the opinion of our employment adviser, the total cost of a successful application by the employee to a Court or Tribunal (including the likely level of compensation that might be awarded by a court or tribunal and associated costs to the organisation to participate in the tribunal) • Payment does not exceed the equivalent of one year's salary for the employee • That this payment is instead of (rather than additional to) any redundancy entitlement
6.6	An offer of employment (temporary or permanent) to someone who is closely connected to a member of staff	Yes	This is permitted as long as: • There has been an open recruitment exercise in accordance with our policy that you have not played any part in <i>and</i> • You have no direct or indirect line management or supervision responsibility for the post <i>and</i>

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			- The offer of employment complies with our policy and is approved by the Director or Chairperson <i>and</i> - You record your connection to the successful applicant in the register within five days of their acceptance of the offer. Since there can be no direct or indirect line management responsibility, someone who is closely connected to the Director cannot be appointed to any role.
6.7	The offer of employment (temporary or permanent) to someone who is: - a current member of the Board - was previously a member of the Board in the past 12 months - is closely connected to a current member of our Board	No	This cannot be permitted. This is because the governing body (GB) is the employer and determines all policies, terms and conditions relating to our employment practices. Consequently, it is very difficult to avoid the risk of a perception that someone closely connected to one of our people may have been unfairly advantaged, or that an employee of a Board member may be able to exert inappropriate influence. Equally, of someone who is, or has recently been a member of the GB, it is essential to ensure that it is not possible for there to be any risk of a perception that they have received favourable treatment and/or had access to

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			privileged information about a post that they are subsequently recruited to.
6.8	Appointment of one of our staff members to the Board.	No	This cannot be permitted in accordance with the Rules of the organisation.
6.9	Nomination, election or co-option to the governing body of someone who was, in the last twelve months, a member of staff	No	This cannot be permitted. This is because the GB is the employer and determines all policies, terms and conditions relating to our employment practices. Consequently, it is very difficult to avoid the risk of a perception that someone who has recently been an employee may be able to exert inappropriate influence.
6.10	Nominations to join the Board from people who are connected to a serving member.	No	This cannot be permitted in accordance with the Rules of the organisation. (Rule 43)
6.11	Nomination to join the Board from someone who is closely connected to an employee.	No	This cannot be permitted. This is because the GB is the employer and determines all policies, terms and conditions relating to our employment practices. Consequently, it is very difficult to avoid the risk of a perception that someone closely connected to one of our

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			people may be able to exert inappropriate influence. Nomination/application forms should require potential GBMs to identify anyone they are closely connected to: if a nominee is closely connected to a current employee, Rule 40.3.2 permits the GB to reject the nomination
OUR PEOPLE AS TENANTS OR SERVICE USERS			
6.12	The offer of a tenancy or lease in one of our properties, to one of our people or to someone closely connected to them.	Yes	This is permitted as long as • it is in accordance with our published allocations policy and our procedures for determining an allocation involving one of our people or someone closely connected to them, and • Neither the applicant or anyone connected to the applicant is involved in any way or in any part of the allocation process and • The tenancy is recorded as an interest in the appropriate register within five days of the tenancy commencing and reported to the GB at its next meeting

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
6.13	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 Where one of our people is a tenant who is eligible to receive 'in-kind' support (e.g. fuel voucher, energy saving appliance) that is available to all tenants, this does not need to be individually registered/recorded as the tenancy has already been declared and registered	Yes	Repairs carried out in accordance with our policy do not need to be recorded. Adaptations must comply with our policy and be approved by the Director. 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
6.14	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	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. Prizes or awards in competitions open to all tenants in the same community (e.g. garden

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			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.
TRAINING AND EVENTS			
6.15	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.
6.16	The organisation paying for accommodation in connection with attendance at relevant conferences or events that you are attending on behalf of or in connection with your role with us or our subsidiaries	Yes	Accommodation that is part of a conference or training package does not need to be recorded in the register, but attendance will be recorded on the relevant individual training plan. Residential conferences are important in ensuring that our people have the necessary skills, knowledge and experience to make an effective contribution to our activities.
6.17	Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business and that do not form part of a sector conference e.g. SFHA Annual Conference.	Yes (where total cost does not exceed £500)	The Board must approve attendance in advance, and will only do so if:

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			• The organisation or one of our people (because of their role with us) has been nominated for an award; or • attendance is in recognition of achievement of or in pursuit of appropriate business development; or • we can demonstrate that attendance or participation is directly related to furthering our aims and objectives. Where we ask you to represent us at such an event, this should be recorded in the register along with any associated costs (including travel, accommodation and the costs of attendance at the event) within five days of attendance. The total cost should not exceed £500 per person and we will make all arrangements in advance. Where costs would exceed £500, we will not normally seek to be represented at such an event. If there is a clear, viable business case for attending, a report will be presented to the Board in order that their specific approval is obtained in advance.

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
	GIFTS AND HOSPITALITY		
6.18	Gifts received from tenants and external sources	Yes (not exceeding a value of £70)	Small gifts (e.g. a box of chocolates, pens, folders, paperweights, flowers) can be accepted if: - the cumulative value of gifts received from the same source in a 12 month period does not exceed £70 - you do not receive more than three such gifts from the same source in a 12 month period - you record receipt of the gift(s) in the register You should not normally accept other gifts and should decline any gifts with a value of more than £70 unless to do so would cause offence or otherwise damage our reputation. In these cases you must: - Advise the donor that the gift will be donated to charity or will form part of our annual charity fund raising activities - Record the gift and the action taken in the register within five days

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			You should not regularly accept gifts from the same source and never more than three times from the same source within a 12 month period. This restriction is intended to protect our people from any suggestion of impropriety in how they conduct themselves when acting on our behalf. The total cumulative value of gifts received from the same source over the course of a year must never exceed £70. You should also record any offers that you decline and the reasons for this, in the register within five days.
6.19	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 £120)	Gifts from the organisation to our people can be permitted in cases where it is to mark a special occasion or significant events including: • Family events (e.g. marriage, milestone birthday, birth of a child), • Retirement • Leaving the organisation

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			These must be recorded in the relevant register and the value of such gifts will not normally exceed £120. Connected people who are not employees are responsible for ensuring that any tax liability associated with a payment you are entitled to receive is met. Please note, that this does not include collections by our people using their own personal funds to mark special occasions. These are always permitted with no requirement to declare. For staff, contractual terms may be in place that dictate the value of any gift upon retirement/long service.
6.20	Hospitality associated with our business and that of its partners	Yes (when not exceeding a value of £70)	Modest hospitality, such as a sandwich lunch or networking event, is permitted and does not need to be recorded All other hospitality up to a value of £70 is permitted but must be recorded in the register, along with an estimation of the value of hospitality received, within five days of attendance.

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			Contributions to seasonal celebrations for staff and Board, (e.g. Christmas) are permitted: it is for individual RSLs to set the terms of such contributions which, of course, must not exceed what is permitted by this Model EPB Policy (£70 per person). RSL's policy on gifts and hospitality should cover this. You should not accept invitations with a value that is greater than £70, unless you have prior approval from Board. The type of hospitality offered will also be taken into consideration, e.g. we will not normally accept invitations to sporting events, concerts, golf tournaments etc. In this case, the reason for acceptance must also be included in the register and countersigned by the Director or Chairperson.
6.21	Our people seeking donations from our contractors/suppliers when fundraising for charity	Yes	This is permitted provided: • Approval is gained from the Director or Chairperson prior to making any approach • Any donations received are recorded in the register

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			We recognise our social responsibility and promote charity fundraising by the organisation and our people.
PROCURING GOODS/SERVICES			
6.22	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: • Our policy and procedures are followed • The prospective purchaser should play no part in the processing of the transaction by the organisation • It is declared and recorded in the register within five days of the missives being concluded confirming the process followed.
6.23	The organisation entering into a contract with a contractor or service provider where one of our people, or someone connected to them, has significant control and the contract is within the scope of public procurement legislation.	It must be permitted where excluding the contractor/service provider would put the organisation in breach of its obligations under applicable	This must be permitted where: 1) the contract is subject to applicable procurement legislation (including the Public Contracts (S) Regulations 2015 and the Procurement Reform (Scotland) Act 2014); and 2) the contract has been procured in accordance with that legislation and

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
		procurement legislation.	the contractor/service provider has not been excluded and has been selected as the preferred bidder. In particular it will be necessary to ensure that any potential conflict of interest is managed during the procurement process in order to avoid any distortion of competition and ensure equal treatment of contractors. This may be achieved by the following: • The person connected to the contractor has played no part in the development of the terms of the procurement exercise or the contract prior to it being advertised. • The person connected to the contractor is not involved in any part of the procurement process (including specification of the contract requirements) or decision to award the contract. If the above steps are taken, then it is unlikely to be lawful to exclude the contractor. If those steps cannot be complied with then it may be

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			both permitted and necessary to exclude the contractor, but only if there is no other means short of exclusion to remedy the conflict of interest. The appointment of a connected contractor must be reported to the Governing Body and recorded in the relevant Register(s) along with details of the process followed. Once the contract has been awarded in accordance with the relevant procurement legislation, the organisation must manage the contract in accordance with the Scottish Financial Management, particularly Regulatory Standard <i>5.4: Governing body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position.</i>
6.24	The organisation entering into a contract with a contractor or service provider where one of our people, or someone closely connected to them, has significant control, and the contract is not within the scope of the public procurement legislation.	Only in specific and limited circumstances	We could only consider this where: • There is no reasonable alternative (e.g. because of geography or the specialist nature of the goods/services) AND

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
			• The person affected by this policy is not involved in any part of the procurement process or decision • The appointment is approved by the Governing Body which is satisfied that the appointment is reasonable in the circumstances In such rare circumstances, the appointment must be recorded in the register along with details of the process followed.
6.25	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 closely connected to one of our people	No (in almost all cases)	This cannot be permitted in almost all cases. The only exception would be if you were referred to us under the Scottish Government's Mortgage to Rent scheme, where this would be permitted provided: • Our policy and procedures are followed • The prospective seller plays no part in the decision to purchase the property or the processing of the transaction by the organisation • It is declared and recorded in the register within five days upon conclusion

REF	EXAMPLE	CAN THIS BE PERMITTED?	ACTION NECESSARY
6.26	The purchase of goods/services from our suppliers/contractors by one of our people	Yes – if no other reasonable alternative exists	This should normally be avoided, and will only be potentially permitted if the procedure identified in Section 4 is followed

7 . Review

- 7.1 Our Rules require the Board to set our policy on payments and benefits and keep it under review. This policy has been approved by our Board and is based on the Model published by the SFHA. It is consistent with the requirements of our Codes of Conduct for Board members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements.
- 7.2 This policy was adopted by our Board on **22nd April 2026**.
It will be reviewed not later than April 2029.

REPAIRS & MAINTENANCE CONTRACTORS

A Cuthill Glazing Limited
 Allan Moncrieff Alarms
 ASC Fencing Ltd
 Bayview Carpets Ltd
 Borthwick Decorators
 Brown & Barrie Roofing & Roughcasting
 C R Smith Glaziers (Dunfermline) Ltd
 C.E.F. (Glenrothes)
 CF Securicom
 Clarke's Environmental Ltd
 Clear-View Scotland Ltd
 Closomat Ltd
 Craig Gibson
 Crombie Plumbing and Heating
 Discovery Fire Sprinklers
 DNA Contract Flooring Ltd
 Dolphin Stair Lifts
 Elite Windows & Doors Ltd
 Energised Electrical Group Ltd
 Environmental Essentials Limited
 Fife Aerial Services
 Fife Shutters Limited
 Fire Prevention Works Ltd
 FSEW Ltd
 Garvock Services
 Glenrothes & District Aerial Services
 Gutter Guy
 Home Assured Locksmiths
 J Holden Builders
 J J Johnstone Ltd
 James McIntyre & Son Ltd
 K J Mowbray
 Laing & Co
 Liam Petrie
 Lift Control Ltd
 Milton Fabrications
 Moffat Projects (Fife) Ltd
 Paterson SCS
 PAUL Ventilation Services Ltd,
 Pipe Serv Limited
 Richard Irvin Facilities Management Ltd
 Rogerson Plumbing & Heating
 Scott & Simpson (Painters) Ltd

SUPPLIERS/CONSULTANTS

Allanpark Consultants Ltd
 Allia C&C
 Aquila Treasury and Finance Solutions Limited
 Arneil Johnston
 Axion Creative
 Brightridge Technology
 Cameron Audit Ltd
 Changeworks Resources for Life
 Designer Software Ltd
 Discounted Office Supplies
 Domestic Angel
 Electric Center
 Energised Electrical Group Ltd
 Findlays
 Fire Prevention Works Ltd
 GM Supplies & Distribution
 Graham Hygiene Services
 Hardies Property & Construction Consultants
 Harper Macleod LLP
 Hart Total Cleaning
 Helder Goncalves
 Highlander International Recycling
 Holmes Mackillop Solicitors
 Howdens Joinery Co
 Iain M Wilson
 Jeffery Associates
 JLL - Jones Lang LaSalle
 Knowledge Partnership
 Linda Ewart
 Lyreco UK Ltd
 Mission Communications
 MMS Almac Ltd
 Northern Services
 Prospect Hill Design Ltd
 R & M Distribution
 R & M Electrical Wholesalers Ltd
 Richardson & Starling
 RSM UK Risk Assurance Services LLP
 Sandy's Sign Shop
 Sinclair Watt Architects Ltd
 Softworx
 T C Young Solicitors
 Thomson Cooper

REPAIRS & MAINTENANCE CONTRACTORS

Scottish Pest Control Services

Shadow Blinds

Sureserve Energy Services UK Ltd

Thistle Waste Management & Removals Ltd

W Munro (Rehab) Ltd

Wrightline Roadmarkings

Schedule of Registers to be Maintained by RSLs

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

Register	Content	Notes	Required by	Public ⁹
Shareholding Members (Full)	Names and addresses of all shareholding members; their e-mail addresses; the share held and its value; date name entered and, where appropriate) date membership ceased; statement of any other property held by the member in the association		Rule 64	No
Shareholding Members (Abbreviated)	Names and addresses of all shareholding members; their e-mail addresses; date name entered and, where appropriate) date membership ceased	Whilst the register is not publicly available, Rule 81 states: <i>“Any Member or person having a financial interest in the Association can inspect their own account. They may also inspect the second copy of the Register of Members which shall be made available to them for inspection within 7 days of the request of a Member or eligible person. The books must be available for inspection at the place they are kept at all reasonable</i>	Rule 65	No

⁹ Maybe on request at RSL office; this column indicates whether there is a requirement (statutory, regulatory or other) to make publicly available – with particular reference to the Publication Scheme requirements under FOI. Associations may choose to give access to other Registers

Register	Content	Notes	Required by	Public ⁹
		<i>hours. The Committee may set conditions for inspecting the books.”</i>		
Office Bearers	Names and addresses; positions held; date appointed to and left office	Regulatory Framework requires the publication (via website) of the membership of the Governing Body, Office Bearers and length of service. Please note that whilst Rule 64 requires addresses to be kept on the register, there is no requirement to make these public.	Rule 64 Regulatory Framework	Yes (not addresses)
Interests	Register of all declarations of interest made by GBMs and Staff	Should be maintained only for current GBMs and current staff but records should be retained for 12 months in case of any retrospective application and to ensure that any decisions taken in the twelve months following a resignation/ retiral are informed by interests declared. The Chair should make an annual report to the GB to confirm that the register has been reviewed by him/her.	Regulatory Framework EPB Annual Report required by EPB 4.7	Yes
Entitlements, Payments, Benefits, Gifts and Hospitality	Register of all payments and benefits; gifts offered, received and declined by GBMs and staff	Include all/any payments and benefits received that are NOT covered by the terms of a contract of employment or policy (e.g. expenses). Include description and estimated value as well as donor and recipient; where relevant, also record destination of gift (e.g. retained	Regulatory Framework EPB	No

Register	Content	Notes	Required by	Public ⁹
		by individual; shared with colleagues; included in Christmas raffle)		
Use of Seal	Schedule of all occasions when Seal is used; purpose of use and names of those signing		Rule 63	No
Complaints	Register of all complaints received; outcomes and any consequent action	Individuals should not be identified; complaints listed according to category e.g. repairs, ASB, allocations	Complaints Policy/ Procedure	No
Assets	Schedule of all moveable and heritable property owned by the association or in which it has an interest: description; date of purchase; value (book and insurance); date and method of disposal (where relevant)		Financial Regulations Audit Requirement	No
Title Deeds	List of title deeds; brief description and insurance value; details of where deeds retained		Asset Management Policy Financial Regulations Insurance Requirement	No
Disposals	Schedule of all asset disposals; authorisation to dispose (including from SHR); value;		Audit Requirement	No

Register	Content	Notes	Required by	Public ⁹
	direction of disposal and application of proceeds		Asset Management Policy Financial Regulations	
Loans	Part 1: Schedule of all loans outstanding to be repaid by the association; capital borrowed; security provided; lender; repayment term Part 2: Schedule of any loans made by the association		Rule 65	No
Contracts	Schedule of all contracts entered into by the association; purpose; value; duration		Procurement Reform (Scotland) Act	Yes
Fraud	Schedule of all instances of detected/attempted fraud	Available for review by external and internal auditors; reported quarterly to Audit Committee/GB	Financial Regulations	No
Accidents	Schedule of all reported accidents; details of reports made to HSE (where required) and outcomes		HSE	No