

**Entitlements, Payments, Benefits
Policy & Procedures**

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Author	Wendy Russell
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Entitlements, Payments, Benefits Policy & Procedures

1. Introduction

- 1.1 Blackwood's previous Payments, Benefits and Corporate Accountability policy was based on Part 1 of the Schedule of the Housing (Scotland) Act. Schedule 7 of this act outlined principles of good governance which restricted the types of entitlements, payments and benefits that Registered Social Landlords (RSLs) can make to Employees, Board Members and their families. This legislation has now been superseded, and this new policy will ensure continued good governance in this area going forward.
- 1.2 This policy is based on the Scottish Federation of Housing Associations (SFHA) model "Entitlements, Payments and Benefits Policy" which was issued in July 2015.

2. Who The Policy Affects

- 2.1 This policy is aimed at people who are:
- Board Members of our governing body and of the governing body of any of our subsidiaries
 - Everyone who works for us or any of our subsidiaries, whether employed directly or otherwise
- 2.2 For the remainder of this policy the above will be referred to as "**our people**".
- 2.3 Our people are personally responsible for ensuring that they are familiar and comply with the terms of this policy. When signing the respective Code of Conducts for employees and for Board Members, it will reflect that this policy is being complied with.
- 2.4 If there is any uncertainty about anything relating to entitlements, payments or benefits, Board Members should consult with the Chair of the Board or the Chief Executive Officer (CEO) and employees should approach their line manager in the first instance.

3. Policy Statement

- 3.1 We are an RSL and a Scottish Charity. We are part of a sector that has a strong reputation for integrity and accountability to the customers we serve and to our Regulators. This policy describes the entitlements, payments or benefits that our people are able to receive. It also describes what is not permitted, and the arrangements that we have in place to ensure that the requirements of the policy are observed.

- 3.2 The Scottish Housing Regulator (SHR) requires us to have a policy that sets out what payments and benefits we permit. This Policy is intended to be a practical document that supports us in meeting that requirement, demonstrating that we conduct our affairs in line with our values, ensuring we are open and honest and that we are responsible for what we do. It aims to ensure that no one benefits improperly or inappropriately from their involvement with us, but also to ensure that no one is unfairly disadvantaged either.
- 3.3 We recognise that there can be risks to the reputation of the organisation and the individuals concerned, if there are perceptions that inappropriate payments or benefits are being made or received. This policy is intended to protect our people as well as the organisation from such criticism or suspicion. In addition we have Codes of Conduct for Board Members and Employees which prevent the acceptance of excessive hospitality or gifts.
- 3.4 We prohibit any attempt to induce the organisation or our people to offer preferential services or business terms. The Bribery Act of 2010 provides guidance on proportionate measures organisations need to take to ensure that they comply with this piece of legislation. This policy will also cover the requirements for our people to prevent bribery in conjunction with our stance on benefits (gifts and hospitality) – see section 4.3. In the event of any suspicion of bribery or corruption, we will take swift and strong action in accordance with our policy.
- 3.5 We recognise that it is not always possible to ensure that the affairs of the organisation are completely separate from the arrangements that some of our people may make as individuals. For example
- Entitlement where services are required;
 - Where there are a limited number of contractors/suppliers who provide the particular range of goods or services required;
 - Where the contractor/supplier is a mainstream or national organisation
 - Where the scale of the transaction or the nature of the business is not significant;
 - Where a combination of factors outlined above are present
- 3.6 At all times, we expect a common-sense approach to be applied to the interpretation and the application of this policy.
- 3.7 As we are a Scottish Charity, all of our Governing Board Members must also ensure that they comply with the Office of Scottish Charity Regulator (OSCR) guidance to Charity Trustees and charity legislation.

4. Who Our People Need To Consider

- 4.1 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 or birth or law.
- 4.2 As well as considering their own actions, our people must be aware of the potential risk created by the actions of people to whom they are closely connected.

- 4.3 For example, where someone close to our people is entering into an agreement with us, or they have significant involvement with one of our suppliers, our people must follow the terms of this policy.
- 4.4 Our people are expected to make reasonable efforts to identify actions or involvement by anyone with whom they are closely associated that come under the terms of this policy, but a common sense approach should be adopted at all times. There are three groups of people that need to be considered in respect of the application of this policy as identified in the table below.

Table A

Group	Required Response
<p>1. Members of your household</p> <p>This includes:</p> <ul style="list-style-type: none"> • Anyone who normally lives as part of your household (whether related to you or otherwise) • Those who are part of your household but work or study away from home 	<p>We expect you to be aware of and declare any relevant actions of all people in your household. You must take steps to identify, declare and manage these.</p>
<p>2. Partner, Relatives and friends</p> <p>This includes:</p> <ul style="list-style-type: none"> • Your partner (if not part of household) • Your relatives and their partners • Your partner's close relatives (i.e. parent, child, brother or sister) • Your close friends • Anyone you are dependent upon or who is dependent upon you • Acquaintances (such as neighbours, someone you know socially or business contacts/associates) 	<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>

- 4.5 We recognise that our people will not always be closely acquainted with or in regular contact with all of the people listed in the table in 4.4 above and we do not expect our people to go to unreasonable lengths to identify actions or involvement that are covered by this policy. However we do expect our people

to be familiar with the actions of members of their household (Group 1) and of any other people listed in the table above with whom they are in regular contact.

4.6 *We do not expect our people to be aware of or declare the actions of people in Group 2 with whom they do not have regular contact.*

4.7 For the remainder of this policy, those whom our people are required to declare under the circumstances as described above will be described as “connected to our people”.

5 What Our People Need To Consider

5.1 Our people should be aware of and follow the declaration of interest (DOI) process for any of the following situations:

- If anyone connected to our people has 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, 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.
- If anyone connected to our people has involvement in the management of a company or supplier that we do business or that we are about to do business with.
- If anyone connected to our people has involvement in the tendering for or the management of any contract for the provision of goods or services to us.
- If anyone connected to our people applies for employment with us (although they too should declare this on the appropriate section on their job application form).
- If anyone connected to our people applies for a home with Blackwood or applies to have care services provided to them from Blackwood.
- If anyone connected to our people applies to join our Board or the Board of any of Blackwood's subsidiaries.

5.2 If any of the above situations arise, our people must notify either their line manager (in the case of employees) or the Chair (in the case of the Board). They should then make their relevant Senior Management Team (SMT) member aware and the Declaration of Interest procedure should be followed as per Section 7 of this policy. The next section (6) in this policy provides more information on the different types of situation which might arise.

6 What The Policy Covers

6.1 Introduction

6.1.1 This section of the policy sets out in more detail the kinds of circumstances which may arise, under the following headings:

- Entitlements
- Benefits (including Gifts and Hospitality)
- Other payments and declarable interests

6.2 Entitlements

6.2.1 Our people should not normally receive any additional payments or benefits because of their involvement with us. For the avoidance of doubt, this policy does not affect your entitlement to receive any payments or benefits that our people are entitled to receive under the terms of:

- A contract of employment, letter of appointment (or equivalent) with us
- Our expenses policies
- A tenancy or lease agreement with us
- An agreement for the provision of care or support services
- An agreement for the provision of factoring

6.2.2 These are referred to as “Entitlements” in this policy and more information is given in the table below describing further examples and our requirements under each.

TYPES OF ENTITLEMENT	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
Employees Contract of Employment (or equivalent agreement) with Blackwood its subsidiaries	Anything that our people are entitled to receive in connection with their contract of employment – e.g. access to travel loans, pensions, books & equipment in connection with employment	None	N/A
Payment to a member of the Board , in accordance with the terms of their letter of appointment	Since the new SHR Regulatory Framework was put in place, no Board decision has been made regarding remuneration. This policy would be updated if any decision was made.	None	N/A
Entitlements arising from a tenancy agreement , lease or service agreement	For example repairs and improvements to your home, payment of decoration allowances, payments in accordance with any tenant reward or incentive	<ul style="list-style-type: none"> • As long as there is no preferential treatment and that a DOI is made. • If there is no precedent set for a particular decision around home repairs & decoration, this would need to be authorised using the DOI request 	If a new DOI has been raised, this should be approved by the Director of Housing & Care for employees, or for Board Members this would be the

TYPES OF ENTITLEMENT	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
		procedure.	Chair
Board Member Expenses	Payments made in accordance with our Board Member Expenses Policy including out of pocket expenses and travel costs	<ul style="list-style-type: none"> • Expenses are claimed within 1 month of the financial year end • Provided no close connection of Board Members benefit by the payment of expenses 	Chair will decide whether to authorise if the conditions mentioned left are not met.
Offer of Tenancy	Our people are entitled to be offered a tenancy in one of our properties	<ul style="list-style-type: none"> • The Allocation is in line with our policy • The applicant is not involved in the allocation process • The pointing process takes place in another Region • Authorisation is required 	The Director of Housing & Care should authorise all requests, unless he/she is directly involved when it should be the CEO.
Offer of Employment (Temporary, Permanent & Relief)	<p>An offer of employment can be made to someone who is connected to our people as long as the conditions are met.</p> <p>An offer of employment cannot be made to someone who is, or has been in the last twelve months, a member of our Governing Board or to anyone who is related to a member of our Governing Board.</p>	<ul style="list-style-type: none"> • The recruitment is in line with our policy • The relative or friend of the applicant is not involved in the recruitment process • The relative of the applicant will have no direct or indirect line management links to the applicant • Authorisation is required 	The CEO should authorise all requests, unless he/she is directly involved when it should then be referred to the Chair.
Additional Employment	Any of our people who hold or are considering holding any additional roles/jobs with other organisations	<ul style="list-style-type: none"> • Provided there is no conflict of interest between the additional role(s) and the role with Blackwood 	The relevant member of EMT should authorise requests.

6.2.3 Where any authorisation is sought for a DOI the process as outlined in section 7 of this policy should be followed and the DOI register must be updated within 5 working days of it being approved.

6.3 Benefits (Gifts & Hospitality)

- 6.3.1 Our people should not benefit – or be seen to benefit – inappropriately from their involvement with us. This element of the policy should be viewed as a way of protecting our people from potentially compromising circumstances.
- 6.3.2 Any benefit (gift or hospitality) given to our people should be dealt with as per the examples given in the table in section 6.3.5. Instances of Gifts & Hospitality, where appropriate, should be recorded in our Gifts and Hospitality Register.
- 6.3.3 In terms of recording benefits, electronic Gifts & Hospitality (G&H) Registers, covering each Region, Head Office and the Board will be maintained. The Regional Registers will be kept up to date by the Regional Manager and signed off quarterly by the Director of Housing and Care. The Head Office and Board Registers will be kept up to date by the Governance & Information Officer and signed off quarterly by the Head of Business Services.
- 6.3.4 The following are referred to as "Benefits" in this policy:
- Being offered hospitality in connection with their involvement with Blackwood.
 - Offering hospitality or token gifts to others on behalf of the organisation in order to promote our activities.
 - Being offered gifts by our business partners, other RSLs, other Care organisations or agencies that we have contact with, which are small and often promotional.
 - From time to time we may offer gifts to our people to mark significant events such as anniversaries or long service; the achievement of an award or qualification; and family events such as births, weddings and bereavement.
- 6.3.5 The table below sets out in detail what benefits our people can accept, what they cannot accept and what might require further authorisation before acceptance. Please note that all instances detailed below that need to be recorded, should be in the Gifts and Hospitality register.

TYPES OF BENEFIT	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
<p>Attendance at events to mark awards or achievements</p>	<p>Attendance at such events would be relevant to the work of Blackwood – e.g.</p> <ul style="list-style-type: none"> • The organisation or a employee has been nominated for an award • Attendance is in recognition of achievement or in pursuit of appropriate business development • We can demonstrate that attendance and participation is directly related to furthering our aims & objectives 	<ul style="list-style-type: none"> • Only personal invitations need to be recorded • When our people represent Blackwood (e.g. at an awards ceremony) this should be recorded • When accommodation is required for attendance at an event this should be recorded • The total cost of attendance at an event should not normally exceed £500 	<p>The relevant SMT member should approve employee attendance at an event. The Chair should only approve attendance of a Board Member if attendance is out with the agreed Board Learning & Development Plan or Strategic Business Plan.</p>
<p>Hospitality associated with our business and of our partners (up to a value of £50)</p>	<p>Modest hospitality is permitted (e.g. a working lunch or networking event)</p>	<ul style="list-style-type: none"> • All such events should be recorded • We should be cautious about attending events in luxury venues • The estimated value of the hospitality should be recorded • Any invitations that have a value which exceeds £50 should not be accepted without prior approval and reason for that approval should be recorded in the G&H Register. 	<p>SMT (for employees) and the Chair (for Board) should approve such hospitality.</p>
<p>Loans to our people</p>	<p>This is not permitted unless in connection with the contractual terms of employment.</p>	<p>N/A</p>	<p>N/A</p>
<p>Gifts (to a value of £30)</p>	<p>These could be promotional gifts such</p>	<p>Gifts do not need to be recorded in the</p>	<p>Any gifts over £30 need to</p>

TYPES OF BENEFIT	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
received from external sources (such as customers or contractors)	as pens, folders etc. or small thank you gifts – such as toiletries etc.	<p>register provided:</p> <ul style="list-style-type: none"> • The value does not exceed £30 • No more than one gift can be received from the same source within a 12 month period. <p>No other gifts should normally be accepted, and gifts over the £30 value should be declined unless to do so would cause offence or damage our reputation. In such circumstances the donor will be advised that the gift will be donated to charity or will form part of the charity fund raising activities.</p> <ul style="list-style-type: none"> • Offers which are declined should also be recorded in the G&H Register 	be authorised by a member of SMT, and should be recorded in the G&H Register
Gifts (to a value of £30 - £50) received from external sources to mark special occasions	<p>Gifts can be permitted in cases where it is marking a special occasion or significant event including:</p> <ul style="list-style-type: none"> • Family events – such as marriage, milestone birthday, birth of a child • Retirement • Leaving the organisation • Be recorded. 	<ul style="list-style-type: none"> • These gifts must be recorded in the G&H register and the value must not normally exceed £50. • Internal collection for one of our people to mark an occasion is permitted in all cases and doesn't need to be recorded 	
A reward/ incentive as part of an agreed	Prizes or awards in competitions open to customers (e.g. garden competitions) can only	<ul style="list-style-type: none"> • Receipt of the award and the circumstances surrounding it must 	Member of EMT or Chair

TYPES OF BENEFIT	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
scheme or prize run by Blackwood.	be given to our people if the selection process for giving the prize/reward has been carried out by someone independent.	be recorded in the register within 5 days of receipt.	of Blackwood.

- 6.2.5 If any of our people are in doubt as to the validity of giving or receiving gifts/hospitality, or if any of our people are offered anything which could be considered to be a bribe, they should, after reporting it to their line manager, contact a member of the Executive Management Team (EMT) to seek advice. Board Members should contact the Chair.
- 6.2.6 Each person approached with a gift or offer of hospitality is personally responsible for notifying their line manager. Their line manager is responsible for completing an entry into the Gifts and Hospitality Register.
- 6.2.7 At times, when there may be a number of acceptable gifts received by employees (for example at Christmas), they should be distributed among employees in the local Region / Office by drawing numbers, such as a raffle. The method of ensuring the gift is shared can be determined locally.
- 6.2.8 Our people will qualify for a retiral or leaving gift after 5 years of service up to the value of £50.
- 6.2.9 If Blackwood is bequeathed money, property or any other item, this can be accepted but should be recorded in the G&H Register. The gift will then be used in accordance with the instructions from the Executor and reported to Board where appropriate.
- 6.2.10 Our people must not offer customers advice regarding bequests; act as Executors; nor can they accept a bequest if this has resulted from their association with the benefactor as a Board Member or paid employee of Blackwood.
- 6.2.11 Receiving gifts in the form of sponsorship will be considered on an individual basis by EMT who will ensure acceptance will not create a perception of influence or favouritism by the organisation offering the sponsorship.

6.3 **Payments / Interests**

- 6.3.1 We are a contributor to the economies of the areas we work in and we have commercial and business relationships with many different companies, partners, contractors, suppliers and service providers. Our people must ensure that their personal arrangements do not result in receipt of any improper benefit or risk creating any suspicion of impropriety. **Appendix 3** provides an explanation of the payments we can and cannot make in more detail.
- 6.3.2 Our people must ensure that they are fully aware of any involvement that they or someone close to them has with any company, partner, contractor, supplier and service provider that is used by Blackwood, as there are restrictions on our ability

to do business with any such body. Any such involvement would be known as a "conflict of interest". This policy explains what our people need to do to declare a conflict of interest, and what steps they need to take to ensure that they act correctly. The procedure for declaring interests can be found in section 7.

6.3.3 Blackwood will also ensure that all recruitment, tender or contract documentation seeks to identify any relevant connections, in order to flag any conflicts of interest at the earliest opportunity.

6.3.4 The table below gives examples of payments / interests and our requirements under each:

TYPES OF PAYMENT / INTEREST	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
Sale of a property under Right to Buy to someone affected by this policy	If someone affected by this policy wishes to exercise their right to buy a property owned by us the normal process for valuation and sale should be followed and our normal policy applied.	None	N/A
Charity Donations	We recognise our social responsibility and promote charity fundraising by the organisation and our people. Any of our people who are undertaking fundraising can approach our approved contractors / suppliers for donations	<ul style="list-style-type: none"> • Before making the approach to contractors and suppliers approval must be sought. <p>All donations made should be recorded in the DOI Register. Donations over £500 should be approved by the Board</p>	Relevant SMT member should approve approach by employees and Chair should approve approach by Board Members.
Blackwood Contractor / Supplier Use for Blackwood's purposes	Where our people or someone connected to them has an interest	<ul style="list-style-type: none"> • Our Procurement of Works, Services and Supply Policy should be followed • The person connected to the supplier is not involved in the procurement process • The person connected to the supplier will not be involved in the 	The CEO will approve any such instances unless he/she is directly involved in the process – in which instance the Chair will approve.

TYPES OF PAYMENT / INTEREST	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
		ongoing management and work with the supplier	

6.4 Voluntary Severance Payments (VSP)

6.4.1 A *Voluntary Severance Payment* is when an employee is given a payment which is more than is contractually required provided it arises directly from a decision to terminate the employee's contract of employment. For example if an additional month's notice was paid, this would be classed as a VSP. Where a VSP is made, this policy applies and the requirements of the policy for such payments are highlighted in the table below.

TYPES OF PAYMENT / INTEREST	DESCRIPTION	CONDITIONS	WHO NEEDS TO AUTHORISE
Voluntary Severance Payment (VSP) to an employee	<p>We can make a VSP to an employee which is outside the terms of their contract provided it arises directly from a decision to terminate the employee's contract of employment.</p> <p>Employees who receive VSP cannot return to work for Blackwood within 12 months of the payment being made.</p>	<ul style="list-style-type: none"> The total sum of the non-contractual payment is in line with guidelines as issued by the Regulator and our legal advisors. 	The Chief Executive must approve any such payment. HR Team will request using the form as outlined in Appendix 4.

6.4.2 All requests made for VSP, and that are signed off using the form in Appendix 4 should be logged in the VSP Register. The HR Team will be responsible for this Register being kept up to date. The Governance & Information Officer will, on an annual basis, ensure a copy of the Register is printed and signed off by the Head of HR & OD, and countersigned by the Chair, at the same time as the Declaration of Interests Register is signed.

6.4.3 Where a *Redundancy payment* is made, this policy does not apply and the procedure as outlined in the Redundancy Policy should be followed.

7 Personal Use of Blackwood Contractors and Suppliers

7.1 In order to help us maintain Blackwood's excellent reputation, where possible our people should avoid using Blackwood's contractors/suppliers for their own private

purposes. The current Suppliers List can be obtained from the Finance Team or can be found on the Master Index - this highlights contractors and suppliers that fall under the terms of this Policy.

- 7.2 We recognise that there could be certain circumstances where it might not be possible for our people to avoid the use of all the contractors/suppliers on this list, such as where market conditions in a local area make it difficult to obtain a reasonable selection of potential contractors or suppliers. Under such circumstances our people could be permitted to use those contractors/suppliers outlined in the Suppliers List, provided our people are able to demonstrate that they received no preferential treatment in terms of price, quality or any other aspect of service delivery due to their involvement with Blackwood.
- 7.3 Approval to use any supplier detailed on the Suppliers List is at the discretion of the relevant member of the Executive Management Team or for Board Members the Chair will approve. In order to be granted approval, our people will be required to demonstrate that there is no alternative suitable contractors/supplier providing the service required in their local area, and that they will receive no preferential treatment in terms of service or cost (which will need to be demonstrated through quotations and receipts).
- 7.4 If our people are looking to purchase goods or services from any contractor/supplier on the Suppliers List then a declaration of interest must be made outlining:
- That approval for use of the Supplier has been received from the appropriate EMT member or Chair prior to the commencement of the works.
 - That no preferential treatment was received in terms of service or cost
 - Where there is inadvertent use of a contractor on the Suppliers List in an emergency situation, our people must notify the appropriate member of EMT / Chair as quickly as possible thereafter and ensure that an appropriate declaration is entered in the register.
- 7.5 Any contractors/supplier not included on the Suppliers List can be used without the need for any declaration/further action. The Suppliers List represents the majority of the contractor/suppliers that we use, but does not include any of our contractor/suppliers that:
- Only provide services of a small value (for example local window cleaners or sandwich shops)
 - Have such a large national or local standing that no favour could ever be realistically gained (for example banks, utilities companies or national chains).

8 Declarations Of Interest (DOI)

- 8.1 All employees must ensure that any declarations of interest, as outlined in section 6 above, are highlighted to their line manager at the earliest opportunity, and Board members will notify the Chair. If the DOI is new, and authorisation is required, the New DOI Procedure must be followed as per Appendix 1 and 2.

- 8.2 All Employees and Board members will complete a DOI form on a bi-annual basis (every 2 years), as per Appendix 3 to ensure any interests which have arisen throughout the previous 2 years are recorded in the DOI Register.
- 8.3 At Board & Committee Meetings, where a Board member has an interest in any matter being discussed or considered at a meeting, a declaration of interest must be made. The Board Member must not take part in the discussion. As per our Rules it will be at the Chair's discretion whether the Board Member will be permitted to stay in the meeting whilst the matter is being discussed or whether they must withdraw from the meeting. Any declarations made will be recorded in the minute and the DOI Register will be updated after the meeting.
- 8.4 The Code of Conduct for Employees and the Code of Conduct for Board members contains a section on Declaring Interests that should be complied with at all times.
- 8.5 The DOI Register will be maintained by the Governance & Information Officer and overseen by the Secretary.

9 Verification & Approval Of Registers

- 9.1 The Gifts and Hospitality Registers will be reviewed and signed off after the financial year end. The Regional registers will be signed off by the Housing and Care Director, the Head Office Register will be signed off by the Head of Business Services, and the Board Register will be signed off by the Chair. A short summary of the total value of gifts and hospitality received and declined will be reported to the Board on an annual basis.
- 9.2 The Declaration of Interest register will be signed off by the Secretary at the end of the financial year as a true and accurate reflection. The Chair will countersign this document.

10 Policy Review

- 10.1 This policy will be reviewed every 3 years or earlier as required.

Appendix 1

Declaration of Interest Procedure

Declarations of interest (DOI) can be raised by Blackwood employees, Blackwood Board Members or prospective employees / Board members. The procedures below outline the different types of DOI and how they should be managed.

Bi-Annual Declaration of Interest Process - Employees

1. On a bi-annual basis, at the end of the financial year, the HR Team will issue a request to all employees to complete a Declaration of Interest Form as found below in **Appendix 3**. At the same time as issuing the form, the HR team will also link out the approved suppliers list, so that employees, when completing the form, can ensure that they declare their interest in any of our known suppliers.
2. Once employees have completed their section of the form, they will then hand it to their line manager for sign off.
3. The line manager will review the form, and if there are any pre-existing declarations of interest noted on the form (i.e. those which have already been authorised), the manager will note any steps which are being taken to ensure this interest is managed and will sign off and return to HR.
4. If there are any new declarations of interest made on the form, that the line manager was not previously aware of, the "new declaration of interest procedure" as detailed below must be followed before the annual form can be signed off.
5. Line managers will return their completed forms to the HR team.
6. The HR Team will then ensure that all declarations of interest are recorded on the Declaration of Interest Register. If the HR team find that any new declarations of interest have arisen, they should contact the line manager to ensure the new declaration of interest process is followed.

Bi-Annual Declaration of Interest Process – Board Members

1. On a bi-annual basis (every 2 years) , usually after the Annual General Meeting, the Governance & Information Officer will issue a request to all Board Members to complete a Declaration of Interest Form as found below in **Appendix 3**. At the same time as issuing the form, the Governance & Information Officer will also link out the approved suppliers list, so that Board members, when completing the form, can ensure that they declare their interest in any of our known suppliers.
2. Once Board Members have completed their section of the form, the forms will be handed back to the Governance & Information Officer and collated.

3. The Chair of the Board will review all Board Member forms, and if there are any declarations of interest noted on the form, the Chair will note any steps which are being taken to ensure this interest is managed will sign off and return to the Governance & Information Officer.
4. The Governance & Information Officer will then ensure that all declarations of interest are recorded on the Declaration of Interest Register.

New Declaration of Interest Procedure

1. As per the types of DOI outlined in the policy, if any employee finds they have a new declaration of interest, they must first of all notify their line manager.
2. The Line Manager will then refer to the Entitlements, Payments & Benefits Policy for initial guidance.
3. If permission is required in relation to the DOI, the line manager will complete the Declaration of Interest – Request for Approval Form – **Appendix 2**. Information should be completed as follows:
 - a. Date of Request
 - b. Name of person making the request – e.g. Managers name
 - c. Department Making the request – e.g. Assets
 - d. Name of Employee making the request – i.e. the existing employee affected
 - e. What is the Type of Declaration – e.g. my brother in law is tendering for a gardening contract, my daughter has applied for a home with Blackwood and has been shortlisted
 - f. How will this be managed – i.e. is there any line management or supervisory implications?
 - g. When does this need to be approved by? – It may be that this needs to be dealt with quickly so we can offer someone a home to reduce void costs. Any time constraints should be noted on here.
4. If the new DOI is relating to a link with a new employee, the completed form should be emailed to the HR Assistant. For all other types of DOI the completed form will then be emailed to the Governance & Information Officer ((G&IO)or in their absence the Governance & Assurance Manager for processing.
5. The HR Assistant / G&IO will note on the form from whom we need permission for the interest.
6. The HR Assistant / G&IO will then seek out the necessary permission, and update the second section of the form. The DOI will be logged on the DOI Register and if approved, a link to the authorising email or signed form will be noted.
7. The HR Assistant / G&IO will then notify the line manager of either the rejection or approval of the request.
8. The Line Manager will then ensure the employee who made the original DOI is notified.

9. The Declaration of Interest register will be printed off and signed on an annual basis, at the end of the financial year, by the Head of Business Services and the Chair. After this is done, the HR Assistant and Governance & Information Officer will review the register to remove any declarations that are no longer required (e.g. due to employees leaving employment with Blackwood).

Declaration of Interest Procedure – From Job Applicants

1. On the front of the application form, new applicants are asked to declare any interest if a current employee is a member of their household a partner, relative or friend or a Board Member, or they receive services (either Homes or Care/Support) from Blackwood.
2. The HR Team should check applications to ensure that any DOIs are highlighted at the shortlisting stage, so that if there are any major concerns, these can be addressed alongside the interview process.
3. If the job applicant is interviewed and becomes the preferred candidate for the role, the HR Team should follow the New Declaration of Interest Process. This will ensure that approval is given to their appointment and consideration is given to how we will manage any conflict of interest.
4. If the DOI is approved, the HR Team would update the DOI register and then the conclusion of the recruitment can then take place. **PLEASE NOTE THAT POSTS WILL BE OFFERED SUBJECT TO THE NEW DOI PROCEDURE BEEN FOLLOWED AND ANY DECLARATION OF INTEREST BEING APPROVED**

Appendix 2

Declaration of Interest - Request for Approval Form

SECTION 1 – REQUESTING AUTHORISATION

DATE OF REQUEST	
NAME OF PERSON REQUESTING AUTHORISATION	
DEPARTMENT / AREA MAKING REQUEST	
NAME OF EMPLOYEE / BOARD MEMBER MAKING DECLARATION	
WHAT IS THE TYPE OF DECLARATION?	
HOW WILL THIS BE MANAGED?	
WHEN DOES THIS NEED TO BE APPROVED BY?	

SECTION 2 – APPROVING THE DECLARED INTEREST

WHO SHOULD APPROVE THIS REQUEST?	
APPROVED / REJECTED	
DATE APPROVAL / REJECTION GRANTED	
REASON FOR REJECTION IF APPLICABLE	
HAS REQUESTEE BEEN NOTIFIED OF DECISION?	
GOVERNANCE SIGN OFF	

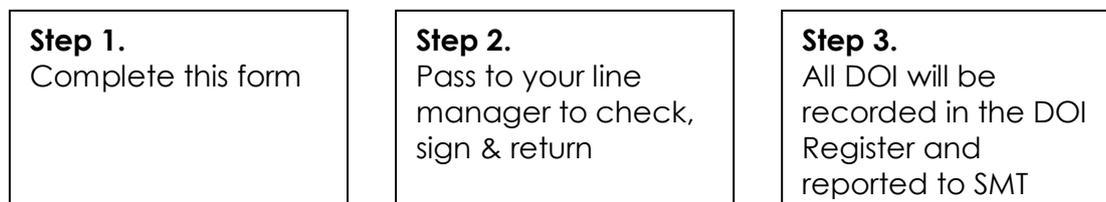
DECLARATION OF INTEREST FORM

FULL NAME (Print)	
LOCATION	
JOB TITLE	
ARE YOU A BOARD MEMBER OR AN EMPLOYEE?	

Declaration of Interest (DOI)

As per our Entitlements, Payments & Benefits policy, we have a legal duty under the Housing (Scotland) Act 2001 to ensure that our staff and Board members have no conflict of interest between their personal circumstances and the work of the Blackwood group, which comprises Blackwood and the Blackwood Foundation.

The Process:



If your circumstances change during the year, it is your responsibility to tell us about a potential conflict of interest. Examples of these could be where you or a close friend, or family member:

- **Is a tenant of Blackwood**
- **Receives Housing Support or Care from Blackwood**
- **Is an employee or Board member of Blackwood**
- **Works with a supplier of goods or services for Blackwood**

For our protection and yours, we need to be clear that when we award contracts, we have not been influenced by friendship or family relationships. We also need to avoid any perception that there has been any influence in the award of these contracts from people we employ.

All staff who award contracts must declare any such connection with anyone who seeks to sell goods or services to us. This includes consultants, contractors and other suppliers.

This is to ensure that your relationship with them does not influence whether or not suppliers or contractors are appointed. If you are in doubt, please ask for guidance.

This also includes appointing staff. If you are involved in recruitment to a post, you must declare any family connection or friendship with anyone applying for the post.

STEP 1 - Please answer every question on this form.

- Are you a close relative of an employee of Blackwood, a customer of Blackwood (Housing or Care) a Board member or someone who works for a third party providing direct services to Blackwood or its customers?

PLEASE INDICATE YES OR NO	
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If you answer yes above, please complete the table below

NAME OF YOUR CLOSE RELATIVE	
DETAILS OF YOUR RELATIONSHIP WITH THEM	
JOB ROLE HELD BY YOUR CLOSE RELATIVE	
DO THEY WORK/LIVE AT THE SAME LOCATION AS YOU?	
IS THERE OR WILL THERE BE A LINE MANAGEMENT RELATIONSHIP BETWEEN YOU AND YOUR RELATIVE? (If yes provide further details)	

Note: A "close relative" is any relative by blood or marriage who is so close that there is a real risk of influence – for example a grandparent, grandchild, parent, child, brother, sister, uncle, aunt, nephew, niece, spouse, in laws or any other person who is closely related to your family. The Scottish Housing Regulator expects the same principle to apply to people with a "close relationship" (e.g. those who are living together).

- In the **last year** have any of your family or friends worked for any organisation which sells goods or services to Blackwood which may cause a conflict of interest? Or do they have a significant financial interest, for example a large shareholding in a private company which trades with us?

PLEASE INDICATE YES OR NO	
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IF YES PLEASE PROVIDE FURTHER DETAILS	
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3. Have you ever been employed in a private capacity by a customer of Blackwood?

PLEASE INDICATE YES OR NO	
IF YES PLEASE PROVIDE FURTHER DETAILS	

4. In the **last year** have you knowingly used or employed for private purposes any person or company who sells goods or services to Blackwood?

PLEASE INDICATE YES OR NO	
IF YES PLEASE PROVIDE FURTHER DETAILS	

5. More generally, please supply details of all bodies in which you have an interest which could have an influence on your role as an employee or Board member as:

- a Director or other officer of a business trading for profit, or
- an official or elected member of any statutory body

PLEASE INDICATE YES OR NO	
--	--

6. Are you a Customer (Housing or Care) of Blackwood?

PLEASE INDICATE YES OR NO	
--	--

IF YES PLEASE PROVIDE FURTHER DETAILS	
--	--

Personal Relationships

Any personal relationships which develop between staff members, customers and Board members are not in themselves a breach of our policy. However we need to avoid any conflict of interest that may arise from such a relationship. Examples might include line management, dealing with grievance or disciplinary matters, or anything else where having a relationship with someone might be thought to create a conflict of interest. In the case of tenants, it includes anything directly affecting their tenancy or in the case of Service Users it includes anything directly affecting the provision of their Care & Support.

You are therefore asked to declare any such relationship where a conflict of interest may arise.

Where a relationship is declared then Blackwood will if possible make adjustments to manage the perceived conflict of interest. When this is not possible, a decision will be made using the criteria outlined in the Entitlements, Payments & Benefits Policy to remove the perceived conflict of interest. Confidentiality and sensitivity will be observed in dealing with the above.

Please declare anything which relates to the above.

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7. Do you issue any contracts to organisations seeking to trade with Blackwood which may be influenced by a personal relationship?

PLEASE INDICATE YES OR NO	
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If yes please complete the table below:

NAME OF BUSINESS OR INDIVIDUAL WHO HAS BEEN INVITED TO TENDER	
NAME OF BUSINESS OR INDIVIDUAL TO WHOM THE CONTRACT MAY BE / HAS BEEN GRANTED	

PLEASE GIVE DETAILS OF YOUR INTEREST AND INVOLVEMENT WITH THE BUSINESS OR INDIVIDUAL	
--	--

SIGNED	
DATED	

Employees - please return this form to your **line manager** for review and signature, they will then forward to the HR Team.

Board Members – please return this form to the **Admin & Governance Team Leader**, who will then liaise with the Chair to review.

STEP 2 Line Manager Review

Is there a potential conflict of interest declared in this form?

PLEASE INDICATE YES OR NO	
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Please outline below the reason for this potential conflict, the discussion you have had with the employee and the actions that you have put in place to minimise the conflict.

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SIGNED	
DATED	

STEP 3 FOLLOW UP ACTION (including review of actions above)

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SIGNED	
DATED	

STEP 4 - RECORDING IN THE DECLARATION OF INTEREST REGISTER

DATE RECORDED IN THE DOI REGISTER	
SIGNATURE	

Appendix 4

Request for Voluntary Severance Payment (VSP)

Section 1 – Details of request

Name of employee	
Name of person requesting VSP	
Date of request	
Reason for making VSP	
Termination date	
Amount of VSP	
Notice to be paid to employee	
Has a settlement agreement been signed?	<i>Please highlight as appropriate.</i> Yes No To follow

Section 2 – Approval of request

Request approved by Chief Executive	
Date of approval	