

Entitlements, Payments & Benefits Policy (Based on SFHA Model)



Document Control

Responsible Person	Chief Executive			
Review Frequency	5 Yearly			
Reviewed by	Board			
Date Approved	August 2020			
Next Review Due	April 2025 (in line with Employee Handbook)			
Consultation Required	Yes		No	✓
Equalities Impact Assessment	Yes		No	✓
Added to Company Website	Yes	✓	No	
Associated Documents Considered	Yes	✓	No	

1. Introduction

- 1.1. As a Registered Social Landlord (RSL), Waverley Housing is required to adopt and comply with an appropriate Code of Conduct for employees and governing body members. It is the responsibility of all staff, and governing body members, to make themselves familiar with the terms of the Code(s) of Conduct and act in accordance with their requirements at all times.

2. Aims and Objectives

- 2.1. This policy describes the arrangements that we have in place to ensure that the requirements of the Code of Conduct are observed.
- 2.2. The Scottish Housing Regulator (SHR) requires us to have a policy that sets out what payments and benefits we permit and to ensure that these arrangements demonstrate transparency, honesty and propriety. We must ensure there is no justifiable public perception of impropriety.
- 2.3. As a Scottish Charity, all of our Governing Body Members must also ensure that they comply with the Office of the Scottish Charity Regulator (OSCR) guidance to Charity Trustees and charity legislation.
- 2.4. This Policy is intended to be a practical document that supports the implementation of the Code of Conduct and which links the Code to the Entitlement, Payments and Benefits Procedure. The EPB Procedure describes the entitlements, payments or benefits that Waverley Housing Staff 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 Code of Conduct Policy are observed.
- 2.5. The EPB Policy has been established to guide Waverley Housing staff in meeting all of the above requirements, ensuring that no one benefits improperly or inappropriately from their involvement with us, but also that they are not unfairly disadvantaged. We expect all staff to act in good faith, and in applying the terms of the policy we will always take this into account.

3. Implementation of the Policy

- 3.1. As someone who is affected by this policy, you are personally responsible for ensuring that you are familiar with and comply with its terms. The implementation of the Policy is guided by the Code of Conduct and Entitlements Payments and Benefits Procedure both of which should be read in conjunction with the EPB Policy.
- 3.2. 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 or benefits you should consult with the Chair or CEO (if you are a member of the governing body) or with your line manager (if you are a member of staff).
- 3.3. As we contribute to the economy of the areas we work in and we have commercial and business relationships with many different companies, contractors, suppliers and service providers, you must ensure that we are fully aware of any relevant connection that you or someone you are close to has with any of these businesses or organisations.

- 3.4. Appendix 1 of the Code of Conduct for Employees Policy sets out the procedural approach to declaring and managing personal interests including:
- Examples of Interests that must be declared;
 - The definition of a 'close connection'; and
 - Declaring personal interests.
- 3.5. Many of the interests you will be required to declare can be classed as entitlements, payments or benefits. Some entitlements, payments and benefits we can never permit, and others we have additional requirements or conditions that must be met before we can permit.
- 3.6. Apart from payments that our people are entitled to by contract, statute or other agreement (e.g. salary, expenses), we will only make a payment to, or accept a payment from, someone affected by this policy in exceptional circumstances. Appendix A explains the payments we can and cannot make in more detail.
- 3.7. In addition, you potentially could be offered benefits over and above that to which you are contractually entitled, such as gifts or hospitality from external parties. Such offers would be as a direct result of you being one of our people and cannot always be accepted. We require that 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.
- 3.8. The EPB Procedure lists the entitlements, payments and benefits that fall under this policy, and provides guidance on:
- Which could be permitted by the organisation
 - Which will never be permitted by the organisation
 - Which you require to declare in the register of interests
 - Any other further requirements the organisation has before permitting
- 3.9. The Entitlements Payments and Benefits Procedure also includes a series of guidance notes covering:
- a) Granting of tenancies;
 - b) Recruitment;
 - c) Making a specific payment or carrying out work;
 - d) Making a voluntary severance payment to an employee which is outside the contract of employment;
 - e) Payments or benefits to a relevant business;
 - f) Gifts and hospitality;
 - g) Use of approved contractors and suppliers

4. Review

- 4.1. The Governing Body requires to set out our policy on entitlements, payments and benefits and keep it under review. This policy has been approved by our Governing

Body and is consistent with the requirements of our Codes of Conduct for Employees and Governing Body Members.

- 4.2. This policy was adopted by our Governing Body on 29th September 2020. It will be reviewed 5 yearly in accordance with our policy review schedule