



Entitlements, Payments and Benefits – Declaration of Interests & Secondary Employment Procedure

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July 2023	David Boucher	2.0	Cyclical review

Summary of Changes

Section	Change
Whole Document	Sections of text moved from the body of the document to form appendices for guidance
Declaration Form	Layout amended and secondary employment added
Title Change	Entitlements, Payments, and Benefits – Declaration of Interests & Secondary Employment Procedure
Policy number	Changed from G43 to G11a



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1.0 Introduction

This procedure provides guidance regarding the submission of Declarations of Interests and Secondary Employment, in line with the requirements of Ark's Entitlements, Payments and Benefits Policy (G11).

If you are unsure about anything relating to the policy or this procedure, you should consult with the Chair or CEO (if you are a member of the Board of Management) or with your line manager (if you are a member of staff).

2.0 Applicability

The procedure applies to:

- Members of our Board of Management and of the Board of Management of any of our subsidiaries; and
- Everyone who works for us or any of our subsidiaries.

For the remainder of this procedure persons above will be referred to as "our people."

3.0 Statement on Declarations

Our people should not benefit (or be seen to benefit) inappropriately from their involvement with us therefore you are required to declare any relevant interests. Within the context of the policy and procedure relevant interests are defined as follows:

- Use of our contractors or suppliers
- Entitlements, payments, and benefits

As well as considering your own interests and actions, you must also be aware of the potential risk created by people with whom you are closely associated. **Appendix 1** sets out the categories of people who may be connected to you, what you need to consider, and whether a declaration is required.

4.0 Use of our Contractors and Suppliers

Where possible our people and/or someone connected to you should avoid using the organisation's contractors/suppliers for your own personal purposes. A list of contractors and suppliers is available to view on Ark's e-learning platform LearnPro, this list is updated on an annual basis.

Ark does recognise that there could be certain circumstances where it might be difficult for you/someone connected to you, to avoid the use of all the contractors/suppliers on the list,

and **Appendix 2** provides guidance as to the circumstances in which you could be permitted to use those contractors/suppliers and the process for seeking approval.

5.0 Entitlements, Payments, and Benefits

Many of the interests which may require a declaration, can be classed as entitlements, payments, or benefits. As one of our people there is the potential for you to be offered benefits over and above that to which you are contractually entitled, such as gifts or hospitality from external parties. Such offers would be as a direct result of you being one of our people and cannot always be accepted. We require that any such offers are managed and recorded very carefully to ensure the highest levels of probity in our organisation.

Appendix 3 lists the entitlements, payments and benefits that fall under this policy and procedure, and states those which:

- Could be permitted by the organisation.
- Will never be permitted by the organisation.
- Require you to make a declaration in the Register of interests; and
- Have further requirements before the organisation gives permission.

6.0 Making a Declaration

You must record in Ark's Register of Interests by making a formal declaration, any interests that you, or someone connected to you has which are relevant to our business.

In order to do make a declaration you will be required to complete a Declaration of Interests & Secondary Employment Form **Appendix 4**.

6.1 Declaration of interests & Secondary Employment form

If you need to make a declaration you will be required to complete a Declaration of Interests & Secondary Employment form annually, to confirm that your entry is accurate and up to date.

Prior to completing a Declaration of Interests & Secondary Employment form you should have read:

- The Entitlements, Payments, and Benefits Policy
- This Procedure and all the Appendices in full
- The Contractors and Suppliers list on LearnPro
- The relevant code of conduct for Staff/Board of Management

6.2 Declaring an interest - Meetings.

Where you have an interest in any matter that is being discussed or considered at a meeting, you must declare your interest and play no part in the discussion; in addition, you must withdraw from any part of a meeting where the interest arises.

7.0 Implementation and Review

7.1 Implementation

The Operational Management Team (OMT) is responsible for ensuring that this procedure is implemented throughout the organisation.

7.2 Review

The Executive Team will ensure that this procedure is reviewed every 3 years or sooner if required.

Appendix 1

PEOPLE CONNECTED to YOU

People who are 'connected' to you fall into the following 3 groups.

Group 1: Members of your household	Anyone who normally lives as part of your household, whether they are related to you or not, including spouses/partners who work away from home and sons and daughters who are studying away from home.
Group 2: People who are closely associated with you	<ul style="list-style-type: none">• Parents, parents-in-law, and their partners• Sons and daughters; stepsons and stepdaughters and their partners• Brothers and sisters and their partners• A partner's parent, child, brother, or sister• Grandparents, grandchildren, and their partners• Someone who is dependent on you or whom you are dependent or close friends
Group 3: Others you need to consider	<ul style="list-style-type: none">• Other relatives (e.g. uncles, aunts, nieces, nephews & their partners)• Other friends (e.g. someone you are acquainted with socially, neighbours, business contacts/associates)

What You Need to Consider/Taking Action

If you become aware of any action or involvement relating to anyone in the table above, you should declare and manage this as soon as possible.

We do however recognise that you will not always be closely acquainted with, or in regular contact with all the people listed, therefore we do not expect you to go to unreasonable lengths to identify actions or involvement which are covered by this policy and procedure. In addition, you are not expected to be aware of the actions of people in groups 2 and 3 that you do not have a close association and/or regular contact with, and we do not expect you to research into the employment, business interests and other activities of all persons with whom you are closely connected.

We do expect you to be familiar with the actions of members of your household (Group 1), and of any other people listed in the table above with whom you are closely associated and/or in regular contact and you must take steps to identify, declare and manage these.

When considering acting you should do so from the point of view of a reasonable and objective observer and a common-sense approach should be adopted at all times.

The following definitions are the actions and involvement by those to whom you are closely connected that, should you become aware, we would expect you to notify us by making a declaration in the register:

- A significant interest in a company or supplier that we do business with, or which is on our approved list. 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, we do business with or is on our approved list;
- Involvement in the management of any company or supplier that we do business with, or which is on our approved list;
- Involvement in tendering for or the management of any contract for the provision of goods or services to us.
- Application for employment with us.
- Application to join our Board or any of its subsidiaries.
- Application to be a tenant or service user of the organisation; and if they are an existing tenant or service user of the organisation.

Appendix 2

Guidance for using our contractors and suppliers.

As Ark contributes to the economies of the areas where we work, and acknowledging that 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 has with any of these businesses or organisations.

If you are looking to purchase goods or services from any of our contractor or suppliers, 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; and
- That you received or will receive no preferential treatment in terms of service or cost (which you will be required to demonstrate where possible through quotations and receipts. In the event that quotations/ receipts are not available the approving officer will require to discuss the proposed purchase with you to satisfy themselves that you will receive no preferential treatment and may for example seek your permission to contact the contractor/ supplier themselves to clarify the position).

Where you inadvertently use a contractor on the list in an emergency, you must notify the approving officer as quickly as possible thereafter and enter an appropriate declaration in the register.

Any contractor/supplier not included on the list can be used without the need for any declaration/further action. The list represents those contractors/suppliers that are considered to have a material business relationship with Ark for the following reasons:

- We have used them during the two years preceding the preparation of the list; and
- They have invoiced Ark more than £2,000 during the preceding two years.

Notwithstanding the above, the list does not include any contractors/suppliers that:

- During the preceding two years invoiced Ark for less than £2,000; or
- Only provide services of a small value (e.g. local window cleaners, taxi firms, or sandwich shops); or
- Have such a large national or local standing, or their business is structured in such a way, that no favour could ever realistically be gained (e.g. utilities, BT, banks, national chains, advice giving organisations, or universities).

Approval Process

Approval to use those contractors/suppliers on the list is at the discretion of the relevant Line Manager, within Care and Support at Care and Support Manager level or above, within Priory functions at Operational Management Team Level, and within the Board of Management from the Chair, and in the case of approval in relation to the Chair, from the Depute Chair.

To be granted approval, you will be required to demonstrate that there is no reasonable alternative contractor/supplier providing the service required in your local area, and/or that you will receive no preferential treatment in terms of service or cost (which you will be required to demonstrate where possible through quotations and receipts).

In making a decision the approving officer should 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, such as ensuring that the individual is not involved in any transactions with or decisions about the contractor/supplier in question on behalf of the organisation.

Approving officers should maintain a clear audit trail of every approval to use any of our contractors/suppliers. 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 should be formally reported annually to our Board of Management.

Approval will be subject to the following criteria:

- Where market conditions in your local area make it difficult to obtain a reasonable selection of potential contractors or suppliers
- Where there is evidence of a longstanding, arms-length, purchasing relationship with a contractor or supplier which pre-dates you become one of our people
- There is no suggestion that the terms that you receive from the contractor/ supplier will be changed due to your involvement with Ark, and which you would wish to continue.

Under such circumstances you could be permitted to use those contractors/suppliers provided you are able to demonstrate that you received no preferential treatment in terms of price, quality, or any other aspect of service delivery due to your involvement with us.

Appendix 3

Entitlements, Payments and Benefits

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
HUMAN RESOURCES AND RECRUITMENT		
<p>All entitlements arising from your contract of employment with us or one of our subsidiaries, including (but not restricted to):</p> <ul style="list-style-type: none"> • Payment of salary to staff • Access to car or travel loans or salary advances 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 	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.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
Payment to a member of the [BOARD/COMMITTEE] for their role as a [BOARD/COMMITTEE] member, in accordance with the terms of their letter of appointment	[Yes or No]	[Such payments will only be permitted if they are in accordance with the conditions set out in Section 67(3) of the Charities and Trustees Investment (Scotland) Act 2005 ¹⁰ The payment must be recorded in the register of interests within five days of the appointment being confirmed and the register must be kept up to date]
All payments made in accordance with the terms of our expenses policy including: <ul style="list-style-type: none"> • 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.
Provision of a loan by the organisation to one of our People	No	This is not permitted unless in connection with the contractual terms of employment. We cannot make any other loans to individuals.
Redundancy or Voluntary severance payment to an Employee	Yes	We can make redundancy payments to an employee in line with terms their contract

¹⁰ Legislation.Gov.Uk (2005) Charities and Trustees Investment (Scotland) Act 2005 Section 67 (3) available [here](#)

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>Or</p> <p>We can make a voluntary severance payment to an employee which is outside the terms of their contract of employment provided:</p> <ul style="list-style-type: none"> • It arises directly from a decision to terminate the employee's contract of employment • Payment is approved by the [BOARD/COMMITTEE] • 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
An offer of employment (temporary or permanent) to someone who is closely connected to a member of staff	Yes	<p>This is permitted as long as:</p> <ul style="list-style-type: none"> • There has been an open recruitment exercise in accordance with our policy that you have not played any part in and • You have no direct or indirect line management or supervision responsibility for the post and • The offer of employment complies with our policy and is approved by [INSERT APPROPRIATE] and

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
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		<ul style="list-style-type: none"> You record your connection to the successful applicant in the register within five days of their acceptance of the offer.
The offer of employment or contract for the provision of services (e.g. specialist advice) to someone who is, or has been in the last twelve months, a member of our [BOARD/COMMITTEE] or to anyone who is related to a member of the [BOARD/COMMITTEE]	No	This cannot be permitted.
Appointment of one of our staff members to the [BOARD/COMMITTEE]	[Yes or No]	This [can or cannot] be permitted in accordance with the Rules of the organisation.
Nominations to join the [BOARD/COMMITTEE] from people who are connected to a serving member.	[Yes or No]	This [can or cannot] be permitted in accordance with the Rules of the organisation.
OUR PEOPLE AS TENANTS OR SERVICE USERS		
The offer of a tenancy or lease in one of our or any of our subsidiaries' properties to one of our people or to someone closely connected to them.	Yes	<p>This is permitted as long as</p> <ul style="list-style-type: none"> it is in accordance with our published allocations policy 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 offer is approved by the Governing Body in advance and The tenancy is recorded as an interest in the appropriate register within five days of the tenancy commencing

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
Where one of our people (or someone connected to one of our people) is a tenant and receives a repair, improvement or adaptation to their home	Yes	<p>Repairs carried out in accordance with our policy do not need to be recorded.</p> <p>Adaptations must comply with our policy and be approved by [INSERT APPROPRIATE]. The adaptation should be recorded in the register of interests within five days of approval.</p>

		<p>Improvements must be carried out as part of an approved programme and in accordance with our policy. The person affected should declare their interest if/when the programme is being discussed and the improvement recorded in the register of interests within five days of completion</p>
<p>Where one of our people (or someone connected to one of our people) is a tenant and receives payment of a decoration allowance, tenant reward/incentive as part of an agreed scheme or prize.</p>	<p>Yes</p>	<p>Payment of decoration allowances or incentive/reward payments must be made in accordance with our policies and procedures and recorded in the register within five days of receipt.</p> <p>Prizes or awards in competitions open to all tenants in the same community (e.g. garden competitions) can only be given if the selection process for giving the award/prize has been carried out by someone who is independent. Receipt of the award and the circumstances surrounding it must be recorded in the register within five days of receipt.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
TRAINING AND EVENTS		
<p>Attendance at training events or seminars (e.g. SFHA Conferences) or openings/similar events hosted by other RSLs</p>	<p>Yes</p>	<p>There is no requirement to declare and record in the register of interests.</p>
<p>The organisation paying for accommodation in connection with attendance at relevant conferences or events that you are attending on behalf of or in connection with your role with us or our subsidiaries</p>	<p>Yes</p>	<p>Accommodation that is part of a conference or training package does not need to be recorded in the register, but attendance will be recorded on the relevant individual training plan.</p> <p>Residential conferences are important in ensuring that our people have the necessary skills, knowledge and experience to make an effective contribution to our activities.</p>

<p>Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business.</p>	<p>Yes (where total cost does not exceed £500)</p>	<p>The [BOARD/COMMITTEE] must approve attendance in advance, and will only do so if:</p> <ul style="list-style-type: none"> • 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. <p>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.</p>
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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>The total cost should not exceed £500 per person and we will make all arrangements in advance.</p> <p>Where costs would exceed £500, you will not be permitted to attend unless there is a clear, viable business case for attending. In such a case, specific approval of the [BOARD/COMMITTEE] would be required.</p>
GIFTS AND HOSPITALITY		
<p>Gifts received from tenants and external sources</p>	<p>Yes (not exceeding a</p>	<p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights, flowers) can be accepted if:</p>

	value of £60)	<ul style="list-style-type: none"> the cumulative value of gifts received from the same source in a 12-month period does not exceed £60 you do not receive more than two such gifts from the same source in a 12-month period you record receipt of the gift(s) in the register <p>You should not normally accept other gifts and should decline any gifts with a value of more than £60 unless to do so would cause offence or otherwise damage our reputation. In these cases you must:</p> <ul style="list-style-type: none"> 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
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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>You should not regularly accept gifts from the same source and never more than twice from the same source within a 12 month period. The total cumulative value of gifts received from the same source over the course of a year must never exceed £60.</p> <p>You should also record any offers that you decline and the reasons for this, in the register within five days.</p>
<p>Gifts given from us to one of our people or received by one of our people from external sources to mark special occasions.</p>	<p>Yes (not exceeding a value of £100)</p>	<p>Gifts from the organisation to our people can be permitted in cases where it is to mark a special occasion or significant events including:</p> <ul style="list-style-type: none"> Family events (e.g. marriage, milestone birthday, birth of a child), Retirement Leaving the organisation <p>These must be recorded in the relevant register and the value of such gifts will not normally exceed £100.</p>

		Please note, that this does not include collections by our people using their own personal funds to mark special occasions. These are always permitted with no requirement to declare. For staff, contractual terms may be in place that dictate the value of any gift upon retirement/long service.
Hospitality associated with our business and that of its Partners	Yes (when not exceeding a value of £60)	<p>Modest hospitality, such as a sandwich lunch or networking event, is permitted and does not need to be recorded</p> <p>All other hospitality up to a value of £60 is permitted but must be recorded in the register, along with an estimation of the value of hospitality received, within five days of attendance.</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>You should not accept invitations with a value that is greater than £60, unless you have prior approval from the [BOARD/COMMITTEE]. The type of hospitality offered will also be taken into consideration, e.g. we will not normally accept invitations to sporting events, concerts, golf tournaments etc.</p> <p>In this case, the reason for acceptance must also be included in the register and countersigned by [INSERT APPROPRIATE]</p>
Our people seeking donations from our contractors/suppliers when fundraising for charity	Yes	<p>This is permitted provided:</p> <ul style="list-style-type: none"> • Approval is gained from [INSERT APPROPRIATE] prior to making any approach • Any donations received are recorded in the register

We recognise our social responsibility and promote charity fundraising by the organisation and our people. We have a separate policy that sets out our approach to supporting other charities.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
PROCURING GOODS/SERVICES		
Sale of our interest (whole or part) in a property to someone affected by this policy via LIFT, HomeBuy; Help to Buy or other LCHO scheme	Yes	This is permitted, provided: <ul style="list-style-type: none"> • 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.
The organisation entering into a contract with an organisation where one of our people, or someone connected to them, has significant control.	No (in almost all cases)	This is not permitted in almost all circumstances. We could only consider this where: <ul style="list-style-type: none"> • 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 • There is no reasonable alternative (e.g. because of geography or the specialist nature of the goods/services) In such rare circumstances, the appointment would be recorded in the register along with details of the process followed.
The purchase of land or other assets from anyone who is, or has been in the last twelve months, one of our people or who is connected to one of our people	No (in almost all cases)	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

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

Appendix 4.

**ARK HOUSING ASSOCIATION LTD
DECLARATION OF INTERESTS & SECONDARY EMPLOYMENT FORM
FOR EMPLOYEES & MEMBERS of the BOARD of MANANGEMENT**

NAME, POST AND SERVICE

Please print your name below, in block letters.

If you are an employee, please confirm your post & the service/ department in which you work:

SECTION 1- CONTRACTORS & SUPPLIERS

Please review the list of Contractors and Suppliers. By signing this form, you confirm that you do not use, and will not use the contractors/ suppliers on the list.

If you propose using any of the contractors/ suppliers on the list, please complete this section of the form. Please confirm the name of the contractor/ supplier, confirm that you have received approval from the appropriate approving officer, and that you received no preferential treatment in terms of service or cost. Please also attach to this form relevant quotations and receipts, if available.

Name of Contractor:

Name of Approving Ark Officer:

Confirmation that you received no preferential treatment in terms of service or cost:

Confirmation that receipts/quotations are attached:

SECTION 2- PEOPLE CONNECTED TO YOU

Please complete this section if you require to make a declaration in relation to a person who is connected to you.

You should provide details of the relationship(s) and the name of the declared person(s), as well as the reason for the declaration.

Continue on a separate sheet if necessary

SECTION 3- ENTITLEMENTS, PAYMENTS AND BENEFITS THAT YOU SHOULD DECLARE

Please complete this section if you believe that there are entitlements, payments or benefits that you require to declare at this time, as set out in the guidance for this policy and procedure.

Continue separate sheet if necessary

SECTION 4 – SECONDARY EMPLOYMENT

Please complete this section if you are employed in another role with another employer. This can be paid or unpaid work.

EMPLOYER NAME:

JOB ROLE:

HOURS OF WORK:

DECLARATION

NOTE: Please complete this section, even if you have not made any declaration in the sections above.

I hereby confirm that, I (**print name**) have read Ark's Policy and Procedure for Entitlements, Payments and Benefits & Secondary Employment including the associated guidance and have reviewed the current list of Ark Contractors and Suppliers.

I confirm that:

- I will not use any of the listed contractors/ suppliers for my own personal purposes, other than in accordance with Ark's Policy on Entitlements, Payments, and Benefits (G11).
- Other than the declarations made in this form, I have no further declarations of interest to make, which require to be included in Ark's Register of Interests.
- Should I become aware of any issues which require to be declared in Ark's Register of Interests, I will declare them in accordance with the requirements of Ark's Entitlements, Payments, and Benefits Policy.

Signed:

Date:

