

Entitlements, Payments and Benefits Policy

Policy Reference:		G11	
Effective date:	From approval by Board	Review date:	June 2022
Approved by SLT:	Oct 18 (reviewed in new policy format May 19)	Approved by BoM:	June 2019
Owner:	John Rankin	Job Title:	Head of Q&C
To be issued to:		Board of Management ARK Management All ARK employees	
Method of Delivery:		Induction for New Staff and Learnpro e-learning module for all staff	

Version Control

Date	Owner	Version	Reason for Change
May 2019	John Rankin	5.0	Previous version reviewed to separate policy provisions from supporting operational aspects, which have been added to a supporting procedure.

Summary of Changes

Section	Change
Whole Policy	No content changes from previous version of policy, simply format changes to format.
Supporting Procedure (for information only- approved	

by SLT at Oct 2018 meeting)	
2.1	Previous section amended to state that rather than our staff confirming annually that their entry in ARK's Payments and Benefits register is accurate and up to date, they will complete a 3 yearly declaration exercise. This will ensure that all employees remain aware of their responsibilities in relation to declaring relevant payments and benefits immediately, whilst also maintaining a proportionate approach to managing them.
4.3	'Service Manager' amended to 'Care and Support Manager' to reflect change in job title
Appendix 1- Gifts and Hospitality Section	Amended to make it explicit that, whilst it will be possible for ARK staff to receive small gifts on a 'one-off' basis, it will not be permitted for ARK staff to receive gifts from the same source on a regular, recurring basis (e.g. every year on their birthday or every Christmas).

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1.0 ARKs Values

Our organisational values are the basis for everything that we do, from providing housing, care and support to tenants and service users to ensuring that staff have clear standards of performance set. ARK believes that everyone should have the opportunity to lead a happy, healthy and safe life. We value:

- The worth of each person;
- Trusting relationships;
- Understanding difference;
- Challenging oppression;
- Personal and organisational accountability;
- Caring for our physical environment; and
- Enjoyment.

2.0 Purpose

The purpose of this policy, and the procedure which supports it, is to set out what payments and benefits we permit and to ensure that these arrangements demonstrate transparency, honesty and propriety, in accordance with Scottish Housing Regulator (SHR) expectations. Our people cannot benefit inappropriately from their connection with the organisation, and we must ensure there is no justifiable public perception of impropriety.

This policy, and its supporting procedure, are intended to be practical documents that support us in meeting all of the above requirements, ensuring that none of our people benefits improperly or inappropriately from their involvement with us, but also that they are not unfairly disadvantaged. We expect our people to act in good faith, and in applying the terms of the policy and procedure we will always take this into account.

3.0 Policy Statement

ARK will implement a system for identifying, managing and recording the entitlements, payments and benefits that our people are able to receive. We will identify what is not permitted, and the arrangements that we have in place to ensure that the policy requirements are observed.

In order to protect our reputation and demonstrate that we conduct our affairs with openness, honesty and integrity, we will implement and maintain a Register of Interests. Our people will record in this register any interests that they or someone connected to them have which are relevant to our business.

We will implement a system for managing and recording gifts or hospitality from external parties. Our system will specify which entitlements, payments and benefits we can never permit, and those which have additional requirements or conditions that must be met before we can permit them.

4.0 Scope

This policy, and the procedure which supports it, is aimed at people who are:

- 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.

In this policy, and the procedure which supports it, the above are referred to as “our people.”

As someone who is affected by this policy, and its supporting procedure, you are personally responsible for ensuring that you are familiar with and comply with their terms.

5.0 Legal/Regulatory Framework

The key regulatory framework underpinning this policy, and the supporting procedure, is the SHR’s Regulatory Framework, published in February 2019, and in particular Standard 5 in relation to the ARK conducting its affairs with honesty and integrity.

As well as the regulatory imperatives, ensuring that ARK meets its obligations in relation to the SHR’s Regulatory Framework is also in keeping with ARK’s Values, ensures safe policy making, and therefore makes good business sense, as well as supporting continuous improvement.

6.0 Responsibilities

6.1 Board of Management

ARK’s Board of Management is responsible for consideration and approval of this policy, and for ensuring that its decisions are taken in accordance with relevant legislation, regulatory expectations, training and guidance.

6.2 Executive Team

ARK’s Executive Team is responsible for ensuring that this policy is reviewed in accordance with ARK’s schedule for review of policies, or sooner if required. The Executive Team is

responsible for ensuring that all ARK's people are familiar with this policy, and abide by its terms.

6.3 Senior Leadership Team

ARK's Senior Leadership Team is responsible for review of the policy, and for ensuring that all ARK's people are familiar with this policy, and abide by its terms.

6.4 Managers

ARK Managers will be responsible for the effective implementation of this policy within their area of responsibility. They must also ensure that each member of their staff, through induction, and team meetings, is made aware of this policy and that they comply with its terms, and make all relevant declarations.

6.5 All Staff

All ARK employees are required to familiarise themselves with this policy and ensure that they comply with its terms, and make all relevant declarations.

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7.0 Related Policies & Procedures

This policy, and its supporting procedure, should be read in conjunction with the following policies, which should be complied with at all times:

- The Code of Conduct for Staff Members and Board Members;
- ARK's Fraud Policy;
- Allocations;
- Maintenance;
- Procurement of Goods and Services;
- Learning and Development;
- Expenses & Allowances; and
- Recruitment and Selection.

This list is not exhaustive, and our people are required to comply with all of our policies and procedures.

8.0 Equality Impact Assessment (EIA)

No potential equalities issues have been identified in relation to the development of this policy, and consequently an EIA has not been completed.

9.0 Data Protection Impact Assessment (DPIA)

No data protection implications have been identified in relation to the development of this policy, and consequently a DPIA has not been completed.

10.0 Stakeholder Consultation

In developing this policy the following groups were consulted:

- ARK Board of Management;
- ARK Executive Team; and
- ARK Senior Leadership Team.

11.0 Monitoring and Review

11.1 Monitoring

Our Rules require the Board of Management to set our policy on payments and benefits and keep it under review. This policy has been approved by our Board of Management and is consistent with the requirements of our Codes of Conduct for Board of Management Members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements.

ARK's Executive and Senior Leadership Teams will monitor implementation of this policy, and its supporting procedure on an ongoing basis.

11.2 Review

This policy will be reviewed within 3 years from the date of approval by our Board of Management, in accordance with ARK's policy review framework.