



**ENTITLEMENTS,  
PAYMENTS AND  
BENEFITS POLICY**  
V.2 – January 2020

<b>Policy Number</b>	<b>C.31</b>			
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<b>Version Number</b>	<b>2</b>			
<b>Consultation Required</b>	<b>Yes</b>		<b>No</b>	<b>x</b>
<b>Equalities Impact Assessment</b>	<b>Yes</b>		<b>No</b>	<b>x</b>
<b>Added to Website</b>	<b>Yes</b>	<b>x</b>	<b>No</b>	

<b>SSHC Reference</b>	n/a
<b>SHR Reference</b>	Regulatory Standard No 5 - The RSL conducts its affairs with honesty and integrity.

**Related Documents**

- Codes of Conduct ( staff and Committee)
- Anti-Fraud Bribery
- Allocations
- Repairs and Improvements
- Adaptations
- Procurement
- Training
- Expenses
- Recruitment
- Sale of our Property
- Decoration Allowances/Prizes

## **Translation Statement**

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## **Compliance**

This policy has been drafted to ensure that it complies with current legislation and industry good practice.

## **Equality & Diversity**

Fyne Homes is committed to providing services which embrace diversity and which promote equality of opportunity. As an employer we are also committed to equality and diversity within our workforce. Our goal is to ensure that these commitments, reinforced by our Values, are embedded in our day-to-day working practices.

## **Openness & Confidentiality**

Fyne Homes believes that its members, tenants and other interested parties should have access to information on how it conducts itself. This means that unless information requested is considered commercially sensitive or personally confidential it will be made available on request.

## **Data Protection**

Fyne Homes recognises the importance of data protection legislation, including the General Data Protection Regulation, in protecting the rights of individuals in relation to personal information that we may handle and use about them, whether on computer or in paper format. We will ensure that our practices in the handling and use of personal information during the processes and procedures outlined in this policy comply fully with data protection legislation. More information is available from our Data Protection Officer.

## 1. Introduction

- 1.1 This policy is based on the Scottish Federation of Housing Associations (SFHA) model “Entitlements, Payments and Benefits Policy” which has been endorsed by the Scottish Housing Regulator (SHR). Section 10 of the policy however has been amended from the model to reflect Fyne Homes approach to the use of contractors and suppliers by Committee members and employees.
- 1.2 This policy is aimed at people who are:
- 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
- 1.3 For the remainder of this policy the above will be referred to as “our people.”

## 2. Aim

- 2.1 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. We must ensure that the organisation upholds its reputation and that of the sector. Our people cannot benefit inappropriately from their connection with the organisation.
- 2.2 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 this policy are observed.
- 2.3 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<sup>1</sup>. We must ensure there is no justifiable public perception of impropriety.
- 2.4 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 Trustees<sup>2</sup> and charity legislation.
- 2.5 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 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.
- 2.6 As someone who is affected by this policy, you are personally responsible for ensuring that you are familiar with and comply with its terms. When signing the respective Code of Conducts for Staff and Committee members, it will reflect that this policy is being complied with.

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<sup>1</sup> Scottish Housing Regulator (April 2012) Regulatory Framework p28 section 5.13 available [here](#)

<sup>2</sup> Office of the Scottish Charity Regulator (Aug 2013) Guidance For Charity Trustees section 3 available [here](#)

2.7 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 benefits, payments or entitlements 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. Links to Vision and Strategic Priorities**

3.1 This policy aims to fulfil the needs of the Association's Strategic Priorities, in particular: Meeting Housing Needs.

### **4. Legal Framework**

4.1 This Policy acts in accordance with

- The Scottish Housing Regulators Regulatory Framework
- The Housing Scotland Act 2014

### **5. What this Policy Covers**

5.1 This policy covers:

5.1.1 Managing Your Interests

- Registering and Declaring Interests
- Entitlements, Payments & Benefits

5.1.2 People Connected To You

- Who Else You Should Consider When Declaring Interests
- What You Should Consider

5.1.3 Use of Our Contractors/Suppliers by our People

### **6. Other Relevant Policies**

6.1 The Code of Conduct is linked to this policy. Failure to comply with the terms of this policy will be regarded as a breach of the Code of Conduct.

6.2 You are also required to be familiar with and observe the terms of our Anti-Fraud, Bribery and Corruption Policy. We prohibit any attempt to induce the organisation or our people to offer preferential services or business terms and we will at all times comply with the Bribery Act 2010.

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

6.3.1 Allocations

6.3.2 Repairs and Improvements

6.3.3 Adaptations

6.3.4 Procurement

6.3.5 Training

6.3.6 Expenses

6.3.7 Recruitment

- 6.3.8 Sale of our Property
- 6.3.9 Decoration Allowances/Prizes

6.4 Please note that this list is not exhaustive and you are required to comply with all of our policies and procedures.

## 7. Managing Your Interests

### 7.1 Registering and Declaring Interests

7.1.1 In order to protect our reputation and demonstrate that we conduct our affairs with openness, honesty and integrity, we maintain a Register of Interests. 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. You will be required to confirm annually that your entry is accurate and up to date.

7.1.2 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; you may be asked to withdraw from the meeting or be allowed to remain without contributing to any discussion.

7.1.3 The Code of Conduct also contains a section on Declaring Interests that you should comply with at all times.

7.1.4 An annual report will be made to our Governing Body on the entitlements, payments, benefits that have been recorded in the Register.

### 7.2 Entitlements, Payments and Benefits

7.2.1 Many of the interests you will be required to declare can be classed as entitlements, payments or benefits.

7.2.2 As one of our people, 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 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.

7.2.3 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.

7.2.4 As we contribute to the economies 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 connection that you or someone you are close to (see section 9) has with any of these businesses or organisations.

7.2.5. 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.

7.2.6 **Appendix A** lists the entitlements, payments and benefits that fall under this policy, and states:

- 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

## 8. People Connected To You

### 8.1 Who Else You Should Consider When Declaring Interests

8.1.1 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 by birth or law.

8.1.2 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. Who you should consider, and our expectations of you to identify and declare such actions are outlined in Table A

**Table A**

Group	Required Response
<p><b>1. Members of your household</b> This includes:</p> <ul style="list-style-type: none"> <li>• Anyone who normally lives as part of your household (whether related to you or otherwise)</li> <li>• Those who are part of your household but work or study away from home</li> </ul>	<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><b>2. Partner, Relatives and friends</b> This includes:</p> <ul style="list-style-type: none"> <li>• Your partner (if not part of household)</li> <li>• Your relatives and their partners</li> <li>• Your partner’s close relatives (i.e. parent, child, brother or sister)</li> <li>• Your close friends</li> <li>• Anyone you are dependent upon or who is dependent upon you</li> <li>• Acquaintances (such as neighbours, someone you know socially or business contacts/associates)</li> </ul>	<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>

## 8.2 What You Need To Consider

8.2.1 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 outline in Table A:

- A significant interest in a company or supplier with which we do business. 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 with which we do business with
- Involvement in the management of any company or supplier with which we do business 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
- If they are an existing tenant or service user of the organisation

## 9. Use of Our Contractors & Suppliers

9.1 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 outline the contractors and suppliers that fall under the terms of this policy. This is included at **Appendix B**.

9.2 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 B, 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.

9.3 Approval to use those contractors listed at **Appendix B** is at the discretion of the Chief Executive or the Chair where it involves the Chief Executive. In order 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 that you will receive no preferential treatment in terms of service or cost (which you will be required to demonstrate through quotations and receipts)

9.4 If you are looking to purchase goods or services from any contractor/supplier on this list then you must make a declaration (**Appendix C**) 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 B in an emergency situation, you must notify the approving officer as quickly as possible thereafter and enter an appropriate declaration in the register.

9.5 Any contractor/supplier not included on the list at **Appendix B** can be used without the need for any declaration/further action. **Appendix B** 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. utilities, BT, banks or national chains)

## 10. Guidance for approving officer

10.1 The approving officer will have an appropriate level of seniority, in accordance with our scheme of delegation. In making your decision you 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.

10.2 You should maintain a clear audit trail of every approval to use any of our contractors listed at Appendix B. 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 Governing Body.

## 11. Reviewing Process

11.1 Our Rules require the Governing Body to set our policy on 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 Governing Body Members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements.

11.2 This policy will be reviewed in line with the respective current Fyne Homes' policies, and/or where a change in legislation arises.

11.3 If there is a procedural delay in the policy revision then the relative legislation in force at the time will prevail.

<b>Version number</b>	<b>Revision Date</b>	<b>Part of doc revised</b>	<b>Reason for revision</b>	<b>Approved by</b>
<b>2</b>	<b>Jan 2020</b>	<b>Section 9 &amp; App A</b>	<b>Updated to reflect changes to SFHA Policy</b>	<b>Mgt Comm</b>

## Appendix A – Entitlements, Payments and Benefits

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<b>HUMAN RESOURCES AND RECRUITMENT</b>		
<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"> <li>• Payment of salary to staff</li> <li>• access to car or travel loans or salary advances where specified in the employment contract;</li> <li>• pension and/or private health care provided as part of the remuneration package;</li> <li>• performance related pay or bonus awarded in accordance with contractual terms;</li> <li>• books and equipment in connection with employment or training in accordance with agreed policies and/or contractual terms</li> <li>• Reimbursement of professional fees</li> </ul>	Yes	<p>Any entitlement in the terms of your contract is always permitted without the need to record in the register of interests.</p> <p>There are Human Resource processes in place for this purpose.</p>
<p>Payment to a member of the governing body for their role as a governing body member, in accordance with the terms of their letter of appointment</p>	No	<p>Committee members do not receive any remuneration. If this was to change the policy would require updating.</p>
<p>All payments made in accordance with the terms of our expenses policy including:</p> <ul style="list-style-type: none"> <li>• payment of permitted out of pocket expenses</li> <li>• reimbursement of travel costs</li> </ul>	Yes	<p>Entitlements in connection with your role as one of our people are 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.</p>
<p>Provision of a loan by the organisation to one of our people</p>	No	<p>This is not permitted unless in connection with the contractual terms of employment. We cannot make any other loans to individuals.</p>
<p>Redundancy or Voluntary severance payment to an employee</p>	Yes	<p>We can make redundancy payments to an employee in line with terms their contract</p> <p style="text-align: center;">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"> <li>• It arises directly from a decision to terminate the employee's contract of employment</li> <li>• Payment is approved by the Management Committee. That the total</li> </ul>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>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)</p> <ul style="list-style-type: none"> <li>• Payment does not exceed the equivalent of one year's salary for the employee</li> <li>• That this payment is instead of (rather than additional to) any redundancy entitlement</li> </ul>
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"> <li>• There has been an open recruitment exercise in accordance with our policy that you have not played any part in and</li> <li>• You have no direct or indirect line management or supervision responsibility for the post and</li> <li>• The offer of employment complies with our policy and is approved by Chief Executive and reported to the next Management Committee Meeting ( if the Chief Executive is directly involved it should be referred to the Chair) and</li> <li>• You record your connection to the successful applicant in the register following receipt of their acceptance of the offer.</li> </ul>
The offer of employment to someone who is, or has been in the last twelve months, a member of our Governing Body or to anyone who is related to a member of the Governing Body	No	This cannot be permitted
Appointment of one of our staff members to the Governing Body	No	This cannot be permitted in accordance with the Rules of the organisation.
Nominations to join the Governing Body from people who are connected to a serving member.	Yes	This can be permitted in accordance with the Rules of the organisation.
<b>OUR PEOPLE AS TENANTS OR SERVICE USERS</b>		
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"> <li>• it is in accordance with our published allocations policy <b>and</b></li> <li>• Neither the applicant or anyone connected to the applicant is</li> </ul>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>involved in any way or in any part of the allocation process  <b>and</b></p> <ul style="list-style-type: none"> <li>• The offer is approved by the Management Committee in advance</li> <li><b>and</b></li> <li>• The tenancy is recorded as an interest in the appropriate register</li> </ul>
<p>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</p>	<p>Yes</p>	<p><b>Repairs</b> carried out in accordance with our policy do not need to be recorded.</p> <p><b>Adaptations</b> must comply with our policy and be approved by the Technical Services Director. The adaptation should be recorded in the register of interests</p> <p><b>Improvements</b> 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 upon 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><b>Payment of decoration allowances or incentive/reward payments</b> must be made in accordance with our policies and procedures and recorded in the register.</p> <p><b>Prizes or awards</b> 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 of interests</p>
<b>TRAINING AND EVENTS</b>		
<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>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business.	Yes (where not exceeding £500 per person)	<p>The Governing Body must approve attendance prior, and will only do so if:</p> <ul style="list-style-type: none"> <li>• The organisation or one of our people (because of their role with us) has been nominated for an award; or</li> <li>• attendance is in recognition of achievement of or in pursuit of appropriate business development; or</li> <li>• we can demonstrate that attendance or participation is directly related to furthering our aims and objectives.</li> </ul> <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)</p> <p><b>The total cost should not exceed £500 per person and we will make all arrangements in advance.</b></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 Management Committee would be required.</p>
<b>GIFTS AND HOSPITALITY</b>		
Gifts received from tenants and external sources	Yes (not exceeding a value of £25)	<p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights) can be accepted if:</p> <ul style="list-style-type: none"> <li>• the value does not exceed £25</li> <li>• you do not receive more than one such gift from the same source in a 12 month period</li> <li>• you record receipt of the gift in the register</li> </ul> <p>You should not normally accept other gifts and should decline any gifts with a value of more than £25 unless to do so would cause offence or otherwise damage our reputation. In these cases you must:</p> <ul style="list-style-type: none"> <li>• Advise the donor that the gift will be donated to charity or will form part of our annual charity fund raising activities</li> <li>• Record the gift and the action taken in the register</li> </ul> <p>You should not regularly accept gifts from the same source and never more than once from the same source within a 12 month period.</p> <p>You should also record any offers that you decline and the reasons for this.</p>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<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 £25)</p>	<p>Gifts from the organisation to our people can be permitted in cases where it is to mark a special occasion or significant event including:</p> <ul style="list-style-type: none"> <li>• Family events (e.g. marriage, milestone birthday, birth of a child),</li> <li>• Retirement</li> <li>• Leaving the organisation</li> </ul> <p>These must be recorded in the relevant register and the value of such gifts will not normally exceed £25.</p> <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.</p>
<p>Hospitality associated with our business and that of its partners</p>	<p>Yes (when not exceeding a value of £50)</p>	<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 £50 is permitted but must be recorded in the register, along with an estimation of the value of hospitality received</p> <p><b>You should not accept invitations with a value that is greater than £50, unless you have prior approval from the Management 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.</b></p> <p>In this case, the reason for acceptance must also be included in the register and countersigned by the Chief Executive for staff members or the Chair for Committee Members</p>
<p>Our people seeking donations from our contractors/suppliers when fundraising for charity</p>	<p>Yes</p>	<p>This is permitted provided:</p> <ul style="list-style-type: none"> <li>• Approval is gained from the Chief Executive prior to making any approach</li> <li>• Any donations received are recorded in the register</li> </ul> <p>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.</p>
<p>Sponsorship and Donations made by Fyne Homes</p>	<p>Yes</p>	<p>This is permitted in accordance with the Donations from the Common Fund Policy</p>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<b>PROCURING GOODS/SERVICES</b>		
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	<p>This is permitted, provided:</p> <ul style="list-style-type: none"> <li>• Our policy and procedures are followed</li> <li>• The prospective purchaser should play no part in the processing of the transaction by the organisation</li> <li>• It is declared and recorded in the register following missives being concluded confirming the process followed</li> </ul>
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)	<p>This is not permitted in almost all circumstances. We could only consider this where:</p> <ul style="list-style-type: none"> <li>• The person affected by this policy is not involved in any part of the procurement process or decision</li> <li>• The appointment is approved by the Governing Body which is satisfied that the appointment is reasonable in the circumstances</li> <li>• There is no reasonable alternative (e.g. because of geography or the specialist nature of the goods/services)</li> </ul> <p>In such rare circumstances, the appointment would be recorded in the register along with details of the process followed.</p>
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)	<p>This cannot be permitted in almost all cases.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Our policy and procedures are followed</li> <li>• The prospective seller plays no part in the decision to purchase the property or the processing of the transaction by the organisation</li> <li>• It is declared and recorded in the register upon conclusion</li> </ul>
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 10 is followed

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## Appendix B - Contractor/Supplier List

<b>Fyne Homes Contractors/Consultants/Suppliers – Updated December 2019</b>	
<b>Company</b>	<b>Trade</b>
Bell Group	A Framework Contractors – Painting contract
George Hanson (Building Contractors) Ltd	A Framework Contractors- Major/Minor Works
John Brown (Strone) Ltd	A Framework Contractors- Major/Minor Works
MacLeod Construction	A Framework Contractors- Major/Minor Works
McKinven & Colville	A Framework Contractors- Major/Minor Works
CSP Acoustics	Acoustics
Mason UK Ltd	Acoustics/construction
C P Architects	Architects
Collective Architecture	Architects
Wilson Designs	Architects
Bute Blacksmiths	Blacksmiths
John Tyre and Sons	Blacksmiths
MacLeod Construction	Blacksmiths
Neil McCormack	Blacksmiths
Graham and Sibbald	Chartered Surveyors and property consultants
Blinow Enterprises ( Beclean Cleaners)	Cleaning Services
Daisy's cleaning	Cleaning Services
David Campbell	Cleaning Services
Freshnclean	Cleaning Services
Howats Housekeeping and Property Services	Cleaning Services
Lillian Leith	Cleaning Services
Optima Cleaning	Cleaning Services
Out of Your Hands	Cleaning Services
Pristine Clean	Cleaning Services
Pure Clean	Cleaning Services
R & R Removals	Cleaning Services
Rainbow International	Cleaning Services
Sparkclean	Cleaning Services
Tracy McCarry	Cleaning Services
TTB Mobile Cleaning Services	Cleaning Services
R M Bussy & Sons	Contractor/Supplier -flooring
Kirk & Co	Debt Collection
Asco Extinguishers Company Ltd	Fire Extinguisher Maintenance
Rothesay Motor Services	Garage
W & J Duncan	Garage
Andrew Duncan	Garden Maintenance
Argyll Groundcare	Garden Maintenance
Wee Toon Environmental Solutions	Garden Maintenance
Alba Gas Ltd	Gas Maintenance/Service/Auditing
Argyll Homes for All Limited	Gas Maintenance/Service/Auditing
Bute Gas Services	Gas Maintenance/Service/Auditing
Corgi Technical Services	Gas Maintenance/Service/Auditing
Tivoli Group Ltd	Groundworks/landscaping
ACS Physical Risk Control	H&S Advice

Initial Washroom solutions	Hygiene Services
Murray Support Services	Inst/ Maint of Specialist Equipment
West Country Doors	Inst/ Maint of Specialist Equipment - Doors
Safeguard Security	Inst/ Maint of Specialist Equipment – Fire Alarms/Security Systems
Schindler Lifts	Inst/ Maint of Specialist Equipment - Lifts
ARJO Med AB Ltd	Inst/ Maint of Specialist Equipment – medical adaptations
Express Elevators Ltd	Inst/ Maint of Specialist Equipment – Medical Adaptations
Stairlift Scotland	Inst/ Maint of Specialist Equipment – Medical Adaptations
Total Hygiene	Inst/ Maint of Specialist Equipment – Medical Adaptations
W Munro Rehab Ltd	Inst/ Maint of Specialist Equipment – Medical Adaptations
Dorma UK	Inst/ Maint of Specialist Equipment- Doors
Chubb Security	Inst/ Maint of Specialist Equipment- Fire Alarms/Security Systems
Stannah	Inst/Maint of specialist equipment – medical adaptations
Bruce Stevenson Insurance Broker	Insurance
Legal and General	Insurance
Zurich Insurance	Insurance
Argyll Media Limited	Media
Dunoon Observer	Media
Wyves Media	Media
Bell Decorating Group	Painterwork
Allpay Limited	Payment Solutions
One to One Accountancy	Payroll Services
Argyll and Bute Council	Pest Control
Kintyre Vermin and Pest Control	Pest Control
Rentokil Initial Pest Control	Pest Control
Ricoh UK Ltd	Photocopying Equipment
Xeretec Scotland Ltd	Photocopying equipment
SHARE	Professional Body Training
Chartered Institute of Housing	Professional Body/ Training
Charity Learning Consortium Ltd	Professional Body/Training
Elite IT training and Consultancy	Professional Body/Training
Elmhurst Energy Systems	Professional Body/Training
Energy Action Scotland	Professional Body/Training
EVH	Professional Body/Training
Quality Efficiency Forum	Professional Body/Training
Scottish Housing Best Value	Professional Body/Training
SFHA	Professional Body/Training
Ashworth Black	Professional Services
Aberdeen Considerne	Professional Services
Gregor Cameron Consultancy	Professional Services
Living Wage Foundation	Professional Services

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Registers of Scotland	Professional Services
SE Training	Professional Services
Information Law Solutions	Professional Services – DP FOI
Allwag Promotions	Publicity Materials
Ewing Sommerville	Quantity Surveyor
Morham and Brotchie	Quantity Surveyors
NBM	Quantity Surveyors
NBM Construction Cost Consultants	Quantity Surveyors
Macqueen Bros	Removals/ Storage
Safe Shore Monitoring	Safety/Security Services
J Rafferty	Scaffolding
Brigg Environmental Ltd	Septic Tanks
Hutchisons Environmental Solutions	Septic Tanks
Martin Boyle Contracting Ltd	Septic Tanks?
Sage UK	Software
Capita Business Services	Software – Housing management system
Cascade Human Resources Ltd	Software – HR system
Technology Services Group(TSG)	Software – IT support
Commsworld	Software – Phones system/IT support
NCC Services	Software cyber security
T C Young	Solicitors
Carymar	Specialist - Asbestos
The Ventilation Expert	Specialist – domestic and commercial ventilation maintenance
Richardson & Starling	Specialist – Dry Rot, Damp proof etc
PAT Testing Expert	Specialist – Portable Appliance Testing calibration
Scorpio Safety Systems	Specialist - Roof Anchors
Balmore Specialist Contracts Limited	Specialist – Roofing/Stonework?
Wm Brown and Co Engineers Ltd	Specialist – Servicing engineers ( Dry risers/smoke ventilation
John Martin Partnership	Stock Condition Surveys
Ramage Young	Structural and Civil Engineers
Cowal Design Consultants	Structural Engineers
Buildbase	Supplier
Campbells Paint and Hardware	Supplier
Closomat	Supplier
D C Murray	Supplier
Danny's ironmongers	Supplier
Electric centre	Supplier
Entrotec Limited	Supplier
Hanover Scotland	Supplier
Ironmongery Direct Limited	Supplier
J & K Campbell	Supplier
Jewson	Supplier
Jim Martin Supplies	Supplier
Screwfix Direct Ltd	Supplier
West Coast Tool and Plant Hire	Supplier
William Wilson	Supplier - bathrooms
Travis Perkins	Supplier – building supplies

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Cowal Building and Plumbing	Supplier – building/plumbing
City Electrical Factors	Supplier - electrical
Howden Joinery	Supplier - kitchens
Kintyre Sales Ltd	Supplier – plant hire
Banner Group	Supplier - Stationery
Lyreco	Supplier - Stationery
Office Team	Supplier - Stationery
Print Point	Supplier - Stationery
Viking Direct	Supplier - Stationery
Avoira	Supplier – Telecommunications
Gleaner Oils	Supplier –Oil and Gas
The Bike Shed	Suppliers
Language Line	Translation Services
Martin Catlin	Tree Surgeon
MGS Ltd	Tree Surgeon
Tim Stobbart Tree Surgery	Tree Surgeon
Duncan MacBrayne	TV Engineer
Steven Gibson	TV Engineer
Millenium Group TV Ltd	TV/Satellite engineers
DC7	Water Coolers
The Waterpoint	Water Coolers

## Appendix C

### Use of Contractors/Suppliers Declaration Form

Name of Committee Member/Staff Member	
Job Title/Position on Management Committee	
Name of Contractor/Supplier Used	
Description of work carried out/service provided	
Date Used	
Reason Used	
Cost of work carried out/Service Provided	

I declare that no financial or other advantage (i.e. quality or any other aspect of service delivery) was secured in relation to this transaction as a result of my involvement with Fyne Homes Ltd. I have enclosed written quoted (if these were sought given the type of work in question and copies of receipts relating to the work/Service

Signed ..... Date .....

Approved by ..... Date .....