



Probity and accountability policy

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Issued: March 2014

Reviewed: December 2024

Next review: December 2027

1. Policy statement

- 1.1 We have standing orders which includes a code of conduct for Board members. A separate code of conduct for staff is included in our staff handbook. It is the responsibility of the Board to ensure compliance with our rules, standing orders, regulatory code and associated policies and procedures, as they relate to statutory and regulatory requirements. All Board members should ensure their conduct is transparent, effective and in the interest of the organisation and the housing sector as a whole.
- 1.2 This policy takes account of our regulatory and legislative framework.
- 1.3 This policy describes how we manage conflicts of interest and grant payments or benefits to any individual who is or has been one of our Board members or staff within the last year, to close relatives of such a person, or to a business to which such a person is involved in a senior position.
- 1.4 Our Board is responsible for making decisions associated with this policy. In doing so they will ensure that the receiver of any payment or benefit is not treated more favourably because of their connection with us. Any Board member with an interest must declare that interest and where practical leave the room before the issue is discussed.

2. Scope

- 2.1. To ensure we maintain the highest standards of probity, transparency and accountability in all its dealings.
- 2.2. To maintain our good reputation.
- 2.3. To ensure we don't bring the social housing sector into disrepute.

3. Declarations of interest

- 3.1 Our rules set out provisions on board members' interests. Our codes of conduct for board members and staff set out requirements in relation to the declaration of interests.
- 3.2 Our Board members and staff complete an annual declaration of interests and advise the company secretary if other conflicts of interest occur during the year. These are recorded in our register of interests. Disclosures include employment, positions of public responsibility, Board membership of other registered providers and any financial interest that Board members and staff may have relating to our work.
- 3.3 Our register of interests is available for inspection on request to our company secretary.
- 3.4 We pay close attention to declaring any actual or potential conflicts of interest as they arise, that affect individuals, close family, friends or associates. Board members declare to the chair of a meeting any financial or non-financial interests that they



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consider could bring about conflict with our interests and the Board member will not take part in the discussion (or may be asked to leave the room if required) and is not allowed to vote on the matter.

- 3.5 Where an interest is declared at any meeting of a committee or Board, the declaration will be recorded in the minutes of that meeting.
- 3.6 If in doubt the Board member should seek advice in advance of the meeting from the company secretary or chair. All staff should seek advice on declarations of interest from the company secretary.
- 3.7 Any Board member or employee who has a direct or indirect pecuniary interest in any contract or proposed contract, should disclose the fact and not take part in the consideration or any vote on any question with respect to the contract.
- 3.8 The requirement to declare an interest shall not apply to an unavoidable interest in a contract or other matter that a Board member or employee may have, for example as a council taxpayer or inhabitant of an area.
- 3.9 In the case of people living together as partners, the interest of one partner shall, if known to the other, be considered to be also an interest of the other partner.

4. Gifts and hospitality

- 4.1 The requirements in relation to giving and receiving gifts and hospitality is set out in our codes of conduct for board members and staff.
- 4.2 Our board will approve significant hospitality or gifts provided by us or by our Board members or staff in order to avoid any suggestion of impropriety or reputational risk. We will ensure there are clear rules and procedures about when hospitality and gifts may be offered and the requirements for prior approval.
- 4.3 Our Board will approve any significant hospitality or gifts given to our Board members or staff in order to avoid any suggestion of impropriety or reputational risk.
- 4.4 We monitor and record all hospitality given or received by our Board members and staff. The register is available for inspection on request to our company secretary.

5. Non contractual payments to Board members and staff

- 5.1 Our Board members receive payment and are entitled to claim out of pocket expenses that are reasonably incurred as a result of attending events such as Board and committee meetings, away days, public relations events, housing conferences or seminars. These include mileage at the current agreed rate together with any bus or second-class rail fares. All business travel should be undertaken by the most cost effective means available and sharing journeys by car with colleagues wherever possible. Reasonable costs will be reimbursed for meals and overnight accommodation associated with attendance at events on our behalf and any other reasonable expenses.

5.2 Other payments will be considered only where no other options exist to reward or compensate Board members or staff in the light of exceptional circumstances. They will be one-off payments set at a level that avoids any reputational risk to us or the sector.

5.3 There are two separate categories of payment:

- Token gifts to Board members or staff (for example in recognition of long service or on retirement) up to a value of £150
- Corporate events providing hospitality or entertainment specifically for Board members or staff up to a value of £30 a person for an individual event and an overall limit of £150 a year for any person.

5.4 The annual limit of £150 may be granted as a single payment or as two or more smaller ones. The limit should not be seen as the norm, but as one that can, for example, be used to provide a suitable present for a departing chair or long serving board member, or for two awards for separate circumstances being made to the same person.

6. Severance payments

6.1 We recognise the occasional need to make discretionary non-contractual severance payments in circumstances where it is necessary for staff to leave and a severance payment is to be made.

6.2 In considering the amount of any severance payment the chief executive, or where the payment is to be made to the chief executive or members of the executive team, the Board will:

- carefully scrutinise the circumstances to ensure that the proposal is reasonable, in line with our best interests and is lawful
- act in accordance with best practice in the housing sector
- pay no more than one year's gross remuneration as a non-contractual payment
- define gross remuneration to include benefits such as pension contributions, and where pension payments may be considered as part of a severance package, we will seek relevant actuarial and pensions specialist advice

7. Out of court settlements

7.1 Where proposals arise for an out-of-court settlement our Board should make sure they're aware and informed of all the relevant facts and where appropriate, seek independent legal advice.

7.2 We will only make payment of an out-of-court settlement where a business case supports the necessity for early resolution and in particular, the legal advice received indicates any of the following:

- Delays or protracted proceedings are likely to give rise to substantial costs over and above any predicted settlement;
- Operational performance is likely to be adversely affected if the case is not resolved quickly;
- Defence of the action is unlikely to be successful given the nature of the claim.

7.3 Due to the possible time constraints of out of court settlements the executive team may use delegated powers to make decisions. The chief executive will consult the chair as necessary and such decisions will be reported to the Board.

8. Grant and benefits (services or employment)

8.1 In the event that a Board member, employee or a person with whom they are closely connected, applies for housing or support services (including where nominated or referred by another agency), the Board should ensure that:

- there is disclosure of the individual's interest or connection
- consideration of the application is based solely on published allocations criteria
- no person having any direct personal knowledge of the applicant plays any part in the assessment or decision

8.2 We will not offer employment to a person who is closely connected to a Board member. This includes family members such as spouse or partner and close relatives, as well as close friends and business colleagues. Any Board member who is aware of a person connected to them applying for a post with us should notify our human resources team.

8.3 We may employ close relatives of existing staff in non-executive team roles and providing the proper procedures are complied with the:

- applicant should make the relevant declaration on the application form
- applicant is subject to the same selection and recruitment process as any other applicant
- a staff member who is the applicant's relative plays no part in the recruitment process
- a staff member who is the applicant's relative has no involvement in relation to appraisals, pay or rewards
- a staff member who is the applicant's relative has no involvement in relation to line management or supervision.

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9. Provision of indemnity

- 9.1 In line with our rules, we will indemnify any Board member or member of the executive team against specified expenses in connection with any civil or criminal proceedings in relation to us or application for relief from liability for negligence, default, breach of duty or breach of trust in relation to us as long as they are not found guilty, or judgement is given against them.

10. Openness and accountability

- 10.1 Our Board is accountable to our clients and other stakeholders and oversee the publication of an annual report and accounts.
- 10.2 We have a communication strategy and action plan to ensure effective and open communication with all our stakeholders.
- 10.3 We have a whistleblowing policy that provides a framework for staff or Board members to disclose malpractice, illegal acts or omissions.
- 10.4 There are a range of ways in which clients can influence policy and practice in our services. Clients can make their views known and take part in service and policy development.
- 10.5 All our services offer a service guide pack to clients, which includes “Tell-us”, our complaints and compliments policy. This is explained to every client as part of their introduction to the service, so they know how and where to raise any issues of dissatisfaction or complaint. The policy is also available to any person other than a client who wishes to complain about any aspect of our services or implementation of policy.

11. Policy review

- 11.1 The company secretary will ensure that all decisions associated with this policy are recorded, including details of any payment or benefit granted.
- 11.2 This procedure will be reviewed at least every three years by the executive director of investments, assets and risk or whenever relevant legislation changes, or circumstances change.