



fairfield housing
co-operative

ENTITLEMENTS PAYMENTS AND BENEFITS POLICY

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Approved by: Management Committee

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Policy Owner: Management Committee

Policy Author: Corporate Manager

This policy applies to

To all employees and Management Committee Members of Fairfield Housing Co-operative including any Co-optees and Board Members statutorily appointed by the Scottish Housing Regulator “our people”.

Policy Summary

The Entitlements Payments and Benefits Policy provides guidance to employees of and the Management Committee on what is acceptable in terms of entitlements, benefits and payments.

Equalities

Fairfield Housing Co-operative will ensure there is a consistent approach in promoting equality and diversity across all areas and this policy will be administered in accordance with the Fairfield Policy on Equality and Diversity (to be reviewed).

Privacy

This document fully complies with General Data Protection Regulations (2018).

Compliance

SHR Regulatory Standards

Standard 3 - The RSL manages its resources to ensure its financial well-being and economic effectiveness.

Standard 5 - The RSL conducts its affairs with honesty and integrity.

Other Guidance

SHR Regulatory Advice Note: Payments and Benefits 2012

SFHA Model Management Committee Members Guide

Related Policies

Gifts and Hospitality Policy

Code of Conduct (Governing Board Members)

Code of Conduct (Staff)

Financial Regulations

Employers in Voluntary Housing Statement of Terms and Conditions, Section C1, Section 8

Allocations

Repairs and Improvements

Adaptations

Procurement

Committee Expenses

Staff Expenses

Recruitment

Anti Bribery and Fraud Policy and Procedure

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1.0. INTRODUCTION

1.1 FHC is a Registered Social Landlord (RSL) and 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.

1.2 This policy is aimed at people who are:

- Members of our Governing Body
- Everyone who works for us

1.3 For the remainder of this policy the above will be referred to as “our people.”

2.0 PRINCIPLES

2.1 The following principles govern the operation of this:

- Describes the entitlements, payments or benefits that our people are able to receive.
- Describes what is not permitted and the arrangements that we have in place to ensure that the requirements of this policy are observed.
- Clear guidance for staff on how to administer this policy demonstrating transparency, honesty and propriety.
- Ensuring that none of our people benefits improperly or inappropriately from their involvement with us, but also that they are not unfairly disadvantaged.
- Provide current payment rates where appropriate which are detailed within **Appendix 1.**
- **PARA Required re register presented quarterly**

3.0 OBJECTIVES

3.1 The objectives of this policy are to:

- Ensure compliance with the Regulatory Standards of Governance and Financial Management with particular attention to Standard 3 - The RSL manages its resources to ensure its financial well-being and economic effectiveness and Standard 5 - The RSL conducts its affairs with honesty and integrity.
- Ensure that the Management Committee expenses policy is consistent with other

current FHC Policies including our Committee Expenses, Staff Expenses, Code of Conduct for Governing Body Members, Code of Conduct for Staff Members and Financial Regulations.

- Provide appropriate expenses in line with the monetary guides outlined within EVH Salaries and Allowances of which we are full members.

4.0 APPROACH AND METHOD

- 4.1 The Management Committee in its formal approval of the policy acknowledges that it accepts full responsibility for its implementation and will ensure it complies with any regulation and guidance. The Chief Executive will regularly review the policy to ensure that it remains in line with and statutory guidance and do not unfairly affect those individual volunteers on the Management Committee and staff.
- 4.2 Day-to-day responsibility for the operation of this policy lies with the Chief Executive and Corporate Manager who will be responsible for the implementation and administering of the policy and ensure appropriate systems and controls are in place to support the application of the policy. All relevant employees have a responsibility to ensure that this policy is applied as instructed.
- 4.3 As someone who is affected by this policy, you are personally responsible for ensuring that you are familiar with and comply with its terms.
- 4.4 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).

The policy will be implemented using the following approaches:

4.2 WHAT THIS POLICY COVERS

4.2.1 This policy covers:

- Managing Your Interests
 - Registering and Declaring Interests
 - Entitlements, Payments & Benefits
- People Connected To You
 - Who Else You Should Consider When Declaring Interests
 - What You Should Consider
- Use of Our Contractors/Suppliers By Our People

4.3 REGISTERING AND DECLARING INTERESTS

- 4.3.1 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 closely connected to you (see Section 4.5) has which are relevant to our business. You will be required to confirm annually that your entry is accurate and up to date.
- 4.3.2 Where you have an interest in any matter that is being discussed or considered at a meeting, you must declare your interest at the outset of the meeting and play no part in the discussion; you must withdraw from any part of a meeting where the interest arises and where appropriate leave the room until the discussions have taken place.
- 4.3.3 The Code of Conduct also contains a section on Declaring Interests that you should comply with at all times.
- 4.3.4 A Report will be made to our Governing Body every six months on the entitlements, payments, benefits that have been recorded in the Register.

4.4 ENTITLEMENTS, PAYMENTS AND BENEFITS

- 4.4.1 Many of the interests you will be required to declare can be classed as entitlements, payments or benefits.
- 4.4.2 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.
- 4.4.2 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 1** explains the payments we can and cannot make in more detail.
- 4.4.3 As we contribute to the economy (ies) of the area(s) 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 3) has with any of these businesses or organisations.
- 4.4.4 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.

Appendix 1 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

4.5 PEOPLE CONNECTED TO YOU

4.5.1 Who Else You Should Consider When Declaring Interests

Someone ‘closely connected’ to you includes family members and persons who might be reasonably regarded as similar to family members even when there is no relationship by birth or law.

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

4.6 WHAT YOU NEED TO CONSIDER

4.6.1 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 outlined in Table A:

- A significant interest in a company or supplier that we do business with. 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
Involvement in the management of any company or supplier that 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

4.7 USE OF OUR CONTRACTORS & SUPPLIERS

4.7.1 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 outlines the contractors and suppliers that fall under the terms of this policy. This is included at **Appendix 2**.

4.7.2 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 2**, 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.

4.7.3 Approval to use those contractors listed at **Appendix 2** is at the discretion of the approving officer (in accordance with our scheme of delegation) . 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).

- 4.7.4 If you are looking to purchase goods or services from any contractor/supplier on this list then 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
 - 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 2** in an emergency situation, you must notify the approving officer as quickly as possible thereafter and enter an appropriate declaration in the register.
- 4.7.5 Any contractor/supplier not included on the list at **Appendix 2** can be used without the need for any declaration/further action. **Appendix 2** 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)

4.8 GUIDANCE FOR APPROVING OFFICER

- 4.8.1 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. You should maintain a clear audit trail of every approval to use any of our contractors listed at **Appendix 2**. 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.

5.0 BREACHES OF THIS POLICY

- 5.1 Any alleged breach of this policy should be reported to the Chair, Convenor of Audit, Risk and Finance Sub Committee, Chief Executive or Corporate Manager immediately and this will be dealt with according to the protocol for a breach of the Governing Body Code of Conduct.

6.0 MONITORING AND PERFORMANCE MEASUREMENT REPORTING

- 6.1 All declarations of interests will be monitored by the Chief Executive quarterly and reported to the management Committee quarterly.
- 6.2 The Chief Executive will monitor cumulative expense claims on a quarterly and ensure these remain in line with budget, there are no unreasonable, unauthorised or potentially dubious expenses being claimed and that they do not impact financially on the operations of FHC.

6.3 The following areas also will be subject to monitoring and evaluation:

- Risks
- Impacts and outcomes
- Financial and regulatory implications
- Compliance with policy requirements and procedures

These will be actively monitored by the Chief Executive and Corporate Manager.

6.4 Any matter which demonstrates a serious failure of internal controls should also be reported immediately to the Chair of the Management Committee and also the Convenor of the Audit, Risk and Finance Sub Committee.

7.0 COMPLAINTS AND APPEALS

7.1 FHC Committee (e.g.) have the right to appeal any decisions made on matters covered by this Policy according to FHC's Grievance Policy and Procedures/Standing Orders/Rules etc.

8.0 POLICY AVAILABILITY

8.1 This Policy will be provided to Committee Members on joining the Management Committee and available on request. It will be provided to staff at commencement of employment and made available.

9.0 REVIEW

9.1 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.

9.2 This policy was adopted by our Governing Body on 26th August 2015.

9.3 This policy will be reviewed every 2 years, with the next review being due in May 2021.

9.4 An interim review may take place in the event of changes to good practice, or regulatory requirements.

Appendix 1 – 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.
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	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
<p>All payments made in accordance with the terms of our expenses policy including:</p> <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 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.
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.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
Redundancy or Voluntary severance payment to an employee	Yes	<p>We can make redundancy payments to an employee in line with terms their contract.</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 Governing Body • 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 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 Chief Executive and • You record your connection to the successful applicant in the register within five days of their acceptance of the offer.

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
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.
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
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 Asset Manager Advisor. 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>
Where one of our people (or someone connected to one of our people) is a tenant and receives payment of a decoration	Yes	Payment of decoration allowances or incentive/reward payments must be made in accordance with our policies and procedures and recorded in the

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
allowance, tenant reward/incentive as part of an agreed scheme or prize.		<p>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>
TRAINING AND EVENTS		
Attendance at training events or seminars (e.g. SFHA Conferences) or openings/similar events hosted by other RSLs	Yes	There is no requirement to declare and record in the register of interests.
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	Yes	<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>
Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business.	Yes (where not exceeding £500)	<p>The Governing Body must approve attendance prior, 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>

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 Governing Body would be required.</p>
GIFTS AND HOSPITALITY		
<p>Gifts received from tenants and external sources</p>	<p>Yes (not exceeding a value of £25)</p>	<p>Small gifts (e.g. a box of chocolates, pens, folders, paperweights) can be accepted if:</p> <ul style="list-style-type: none"> • the value does not exceed £25 • you do not receive more than one such gift from the same source in a 12 month period • you record receipt of the gift in the register <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"> • 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 <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, 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 £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"> • Family events (e.g. marriage, milestone birthday, birth of a child),

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<ul style="list-style-type: none"> • Retirement • Leaving the organisation <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>
Hospitality associated with our business and that of its partners	Yes (when not exceeding a value of £50)	<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, within five days of attendance.</p> <p>You should not accept invitations with a value that is greater than £50, unless you have prior approval from the Governing Body 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 an appropriate line manager.</p>
Our people seeking donations from our contractors/suppliers when fundraising for charity	No	<p>This is permitted provided:</p> <ul style="list-style-type: none"> • Approval is gained from Management Committee prior to making any approach • Any donations received are recorded in the register

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		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.
PROCURING GOODS/SERVICES		
Sale of a property under Right To Buy to someone affected by this policy	Not applicable	This is permitted with no requirement to declare in the register. The normal process for valuation and sale should be followed and our normal policy would be applied.
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	Not applicable	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. <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</p>

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		provided: <ul style="list-style-type: none"> • 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 • 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 4.7 is followed

[Appendix 2 – Entitlements, Payments and Benefits](#)

See separate attachment for up to date contractors and suppliers list.