

**TABLE 1 - GRANT OF BENEFITS**

- This table applies where a decision is being considered to grant a benefit from any part of Irvine Housing Association to any of those listed in the second column below, or to businesses in which any of those individuals are a principal proprietor or directly concerned in the management.
- The award of any particular benefit is not prevented by this table, provided that an informed decision has been made at an appropriate level, and the potential consequences of the proposed decision have been considered.
- The table does not apply to payments or benefits under a formal contract of employment, agreements for Board Member services or reimbursement of properly incurred appropriate expenses.
- No person may take a decision relating to the granting of benefits to himself or herself or those closely connected to that person.
- If there are any concerns about the appropriateness of any proposed decision, it should be referred upwards to the next level.

DECISION BEING CONSIDERED	RELATING TO THE FOLLOWING OR TO THOSE CLOSELY CONNECTED* TO THEM:	MUST BE MADE BY:	COMMENTS
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HOUSING			
Offers of housing including (but not limited to) tenancies, licences, and shared ownership leases.	Board Members Subsidiary Board Members Managing Director	Board	Care must be taken to avoid any risk of the Association seeming to favour its Board Members or employees. The process must be scrupulously fair.
	All other employees	Managing Director (who must not have been involved in the initial consideration of the specific matter)	The person in question should receive exactly the same consideration as any other applicant. Consideration of the application must be based solely on published allocations criteria, and the applicant must fully meet those criteria and the Association's published priorities.

DECISION BEING CONSIDERED	RELATING TO THE FOLLOWING OR TO THOSE CLOSELY CONNECTED* TO THEM:	MUST BE MADE BY:	COMMENTS
			<p>The individual's interest or connection must be disclosed</p> <p>No person closely connected to the applicant should play any part in the assessment or decision.</p> <p>Accommodation should not be offered with a job unless it is necessary for the post holder to carry out his/her duties properly.</p>
Offers of re-housing to those already housed by the Association	Board Members Subsidiary Board members Managing Director	Board or Subsidiary Board in area where property is situated	<p>Board Members who are also tenants of the association should not be disadvantaged in applying for either a transfer or re-housing, but should ensure they play no part nor exert any influence over the handling of their application.</p> <p>The individual's interest or connection must be disclosed</p> <p>No preferential consideration should be given to the application.</p>
	All other employees	Managing Director	

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SALE/PURCHASE OF LAND			
Sale of property/land (other than under right to buy, right to acquire or similar statutory schemes)  Or purchase of property/land	Board members Subsidiary Board members Managing Director	Board	The greatest of care must be taken to avoid any impropriety or appearance of impropriety.  It is essential as a minimum before entering into any sale agreement to: <ul style="list-style-type: none"> <li>• obtain a report from a qualified experienced surveyor acting exclusively for the association</li> <li>• advertise the disposal in accordance with the recommendations of the surveyor's report;</li> <li>• decide that the proposed disposal is the best that can be reasonably obtained for the association.</li> </ul> No preference should be given to the buyer. It is recommended that appropriate legal advice is sought.
	All other employees	Operations Committee Managing Director	

EMPLOYMENT			
Employment - offers of: <ul style="list-style-type: none"> <li>• employment</li> <li>• re-employment of those who have worked for the Association in the previous 12 months or</li> <li>• engagement as a self employed contractor</li> </ul>	Board Members Subsidiary Board Members Managing Director	Board	Where the applicant is: <ul style="list-style-type: none"> <li>• Board Member, or</li> <li>• a close relative or connection of a Board Member or Managing Director**, or</li> <li>• any Board Member who has left the Association within the last 12 months</li> </ul> the general presumption should be against offering employment.
	All other employees	Managing Director	

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			<p>The Board Member or employee must have no involvement or influence over the recruitment and selection process.</p> <p>Consideration of the application must be based solely on merit and suitability in relation to the requirements of the post.</p> <p>Where employment is offered, the individual must have been considered the best candidate following a full and fair competitive recruitment process taking into account equality and diversity requirements and requirements of the role.</p>
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<b>INDEMNITY</b>			
Provision of indemnity	Board Members Subsidiary Board Members Managing Director	Board	Legal advice should be taken on the power, terms of and limits of any proposed indemnity.
	All other employees	Managing Director	

<b>PAYMENTS TO BUSINESSES TRADING FOR PROFIT</b>			
Payments to businesses trading for profit in which any individuals listed in the second column or those closely connected to them are a principal proprietor or directly concerned in the management.	Board Members Subsidiary Board Members Managing Director	Board	<p>The payments must be for the purpose of furthering the Association's social housing objectives and the benefits to the Association must be clearly demonstrated.</p> <p>Care must be taken to avoid any risk of the Association seeming to favour its Board Members or employees. The process must be scrupulously fair.</p>
	All other employees	Managing Director	

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			No person connected to the business trading for profit should play any part in the decision.
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AWARD OF ANY KIND OF CONTRACT TO BUSINESSES TRADING FOR PROFIT			
Award of any type of contract to businesses trading for profit in which any individuals listed in the second column or those closely connected to them are a principal proprietor or directly concerned in the management.	Board Members Subsidiary Board Members Managing Director	Board	Proper transparent tendering and procurement procedures must be followed.
	All other employees	Managing Director	Care must be taken to avoid any risk of the Association seeming to favour its Board Members or employees. The process must be scrupulously fair.  No person connected to the business trading for profit should play any part in the decision.

GIFTS AND/OR HOSPITALITY			
The provision of significant hospitality or gifts.	Any Board or Committee Member (including Subsidiary Board members, and Co-optees) Any employee Any third party	Board, a Committee of the Board, Subsidiary Board, or the Managing Director.	For the purposes of this paragraph 'significant' means costing over £100 per person for hospitality, or £300 per person for gifts. If the decision is at a meeting it should be recorded in the minutes of that meeting.

OTHER BENEFITS			
The list above is not exhaustive and where any	Board Members Subsidiary Board Members	Board or Subsidiary Board as considered	Where a decision in relation to the grant of a benefit is taken at a meeting the decision should be recorded in

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decision concerning the grant of a benefit may lead to an appearance of improbity, or may raise any other concerns, the decision must be taken in accordance with Table 1.	Managing Director	appropriate in the circumstances	the minutes. In other cases, there is no need to report the provision of social or welfare benefits to the Board save in exceptional or controversial circumstances.
	All other employees	Managing Director or Executive Director (who must not have been involved in the initial consideration of the specific matter)	

\* 'Closely connected' includes husband, wife, civil partner, partner, fiancé, parent, grandparent, child, grandchild, brother, sister, similar relations by marriage, close friend and could include other relationships, such as an aunt or uncle if there is a sufficient degree of closeness. The onus is on the individual to disclose the relationship where there is any doubt.

\*\*Where the applicant is married to, or a civil partner of, a Board Member or the Managing Director it is essential to ensure that the provisions of the Equality Act 2010 are not contravened.

Approved by Board 19 September 2017