

A meeting of the Board will take place on
Thursday 26 March 2026 at 7.00pm
in the Hayman Room, ELHA Head Office

Please advise staff if you are unable to attend

Karen Barry
Secretary

B U S I N E S S

GENERAL

1. Apologies
2. Declaration of Interest by Board Members
3. Minutes of 19 February 2026 – **for approval**
4. Action List – for information
5. Matters Arising

GOVERNANCE

6. Secretary's Report – for information

PERFORMANCE

No reports

PRIORITY ITEMS

7. Charitable Donations 2025/26 – **for approval**

POLICIES

8. Policy Review Summary – for information
9. Authorisations and Standard Charges / Allowances – **for approval**
10. Entitlements, Payments and Benefits Policy – **for approval**
11. Procurement & Value for Money Strategy – **for approval**
12. Landlords Safety Manual Policy Review – for approval

BUSINESS MANAGEMENT

ANY OTHER BUSINESS

DATE OF NEXT ELHA BOARD MEETING

Thursday 28 May 2026 at ELHA Head Office, Haddington, at 7.00pm

Action List

Report by Martin Pollhammer, Chief Executive – for information

The table below sets out the required actions agreed at the last meeting of the Board on 19 February 2026, and confirms the actions taken.

Minute Ref	Action Required	Action By	Action Taken
3	Publish the minutes and papers from the November 2025 meeting on elha.com	ES	Complete
9	Confirm acceptance of Care & Repair funding for 2026/27 with East Lothian Council	KB	Complete
10	Update the Complaints Policy on the ELHA file structure, elha.com and update the Policy Review Calendar	ES	Complete
10	Update the ICT Security Policy on the ELHA file structure, Board area of elha.com and update the Policy Review Calendar	ES	Complete
11	Write-off the debts as approved	KB	Complete

Secretary's Report – for information

1.0 Membership

No new applications for membership have been received.

2.0 Use of Seal for Homologation

No use of the Seal to report.

Charitable Donations 2025/26

Report by Martin Pollhammer, Chief Executive – for Approval

1.0 Donation Policy

The Association's accumulated surplus at 31 March 2025 was £17.8m. The Association's Sponsorship and Donations policy permits it to expend up to 0.5% of the preceding year's audited accumulated surplus, to a maximum of £1,000. As 0.5% of last year's accumulated surplus is £89k, the Association may donate £1,000 this financial year.

The Association may give donations to East Lothian based community projects which are registered charities, and to National Housing Charities.

The Board is responsible for approving donations.

2.0 Proposed Donation 2024/25

It is proposed that, as in previous years, a charitable donation of £1,000 be made to the East Lothian Care & Repair Charitable Trust. The Trust is an Eligible Charity in terms of the Association's policy. The Trust uses its income to help individual Care & Repair clients who are struggling to find the funding for the adaptations they need.

The Trust is administered by the Association's Care & Repair Service staff and its Trustees include ELHA Board Member David Rose. Given the conflict of interest, David will leave the meeting during the discussion of this item.

Recommendation

The Board is asked to approve a donation of £1,000 to the Care & Repair Charitable Trust during the year ending 31 March 2026.

Policy Review Summary

Report by Martin Pollhammer, Chief Executive – for information

The table below sets out policies reviewed by the Senior Management where they have Delegated Authority to undertake the review, since the last ELHA Board meeting.

Policy Title	Reviewed By	Where the revised policy is available	SMT Delegated Approval
Pension Policy	Gary Alison	elha.com	Minor Changes
Attendance & Absence Management Policy	Martin Pollhammer	elha.com	Minor Changes
Treasury Management Policy	Gary Alison	ELHA Board area of elha.com	Minor Changes
These Homes (Allocations) Policy	Karen Barry	elha.com	Internal Auditor's Recommendations (Minor Changes)

Authorisations and Standard Charges / Allowances Policy Review

Report by Gary Alison, Director of Finance & Corporate Services – for Approval

1.0 Introduction

The Authorisations and Standard Charges / Allowances Policy outlines the responsibilities for authorising expenditure and signing documents throughout the Group. It also sets out the standard charges and allowances used within the Group for the coming year.

The Policy is reviewed annually to ensure that it is kept up to date for changes in personnel, and that responsibility levels and charges / allowances remain appropriate. The revised **Policy Document** is attached to this report.

2.0 Summary of Proposed Changes

The Director of Finance & Corporate Services has reviewed the policy and supporting appendices and proposes to make the following changes;

Section	Changes
Throughout	<p>Director of Housing Job Title changed to Director of Housing & Customer Services.</p> <p>There have been a few minor wording changes so the document is easier to read and understand.</p>
Section 10	<p>Decoration allowances uplifted by October 2025 RPI, rounded to the nearest £5.</p>
Section 13	<p>Where applicable, the allowance amounts have been updated in line with EVH Terms & Condition.</p> <p>The mileage rate for EV's – the noted of the HMRC tax free rate has been included rather than an amount as this value changes each quarter, but also now distinguishes between public and private charging rates.</p> <p>Narrative added in to note the mobile phone allowance is payable if a member of staff that is eligible, opts not to take a company phone.</p>

	<p>13.4 – It was recommended, from a recent payroll internal audit, that a list of those roles that qualify for a fixed annual allowance be reviewed and approved annually. In approving this policy, the Board are approving those jobs roles that are marked as in receipt of the allowance.</p> <p>13.5 – paragraph added in about staff eligibility in claiming allowances in the above tables.</p> <p>13.6 – 13.7 – paragraphs added in around claiming of the subsistence allowance. It is proposed that allowances can be claimed at the flat rate allowance in the table, or via receipts, up to the amount in the table. The reason for this is that claiming the allowance without receipts, some or all the allowance becomes taxable, meaning staff and ELHA / R3 suffer tax on this payment. If subsistence is reimbursed at cost for business needs via expenses, there is no tax suffered on this by staff or ELHA / R3.</p> <p>13.8 – paragraph added in on how to claim allowances.</p>
Section 17	<p>Rental income per point uplifted by 4.3% as per 2026/27 rent increase.</p> <p>17.7 added in for Shared Ownership Paper Free discount amount.</p>
Section 19	Updated narrative to note which Board the updated policy would come to.
Appendix 1	No changes, other than to the Director of Housing & Customer Services' job title.
Appendix 2	No changes, other than to reflect updated job titles following new staff structure.
Appendix 3	<p>Updated job titles following senior management changes.</p> <p>Head of Operations authorisation limits added in.</p>
Appendix 5	Rates adjusted to agreed rates with R3 for 2026/27
Appendix 6	This is a new appendix showing which job roles attract car and phone allowances. See comments on Section 13.

Recommendation

The ELHA Board is asked to approve the revised Authorisations and Standard Charges / Allowances Policy.

Approved at ELHA Board 19/03/25

ELHA POLICY

Date Issued	August 1996
Last Reviewed	March 202 6 ⁵
Department	Finance
Title	Authorisations and Standard Charges / Allowances
Objective	To describe the authorisation processes, responsibilities and authority levels and standard charges / allowances to be used within the Group.
Responsible	Director of Finance & Corporate Services
Next Review Date	March 202 7 ⁶

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1. Authorisation of Documentation
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5. Authorisation of Write Offs
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10. Decoration Allowances for Tenants
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12. Tenancy Sustainment
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17. Rental Income
18. Fair Work First Statement
19. Review of Policy

Appendices

- Appendix 1 – Table of Authorisation of Documentation
- Appendix 2 – Table of ELHA Expenditure Authorisation Levels
- Appendix 3 – Table of R3 Expenditure Authorisation Levels
- Appendix 4 – ELHA Fair Work First Statement
- Appendix 5 – List of Chargeable Items

Approved at ELHA Board 19/03/25

1.0 Authorisation of Documentation

- 1.1 The levels of authorisation for signing various documentation are include in **Appendix 1**. Contract approvals mean both contracting with suppliers for goods, services and works and for providing goods, services and works to buyers.
- 1.2 Staff approving grant approvals for new build projects must provide the relevant information to support the Project Approval / Acceptance. This is in accordance with our procedures.
- 1.3 In addition to ELHA staff, Places for People (PfP) staff are authorised to sign/submit documents in line with levels of authorisation in **Appendix 1**.

The staff authorised at PfP to do this on behalf of ELHA are;

- Senior Development Manager
- Development Manager
- PfP Development Director

2.0 Authorisation of Expenditure

The members of staff authorised to make commitments or orders to incur expenditure and to approve invoices, along with the limits on the value relating to this, are detailed in **Appendix 2 & 3**.

Staff should note that there are a number of important points to observe in following this authorisation procedure.

- (a) There are two separate steps involved in incurring expenditure:
 - (i) Taking on the commitment to spend
 - (ii) Approving the invoice after goods or services have been received

The responsibility for (i) and (ii) should, wherever possible, not be taken by the same person. An exception to this is where goods or services are procured by a company credit card and one individual is responsible for committing to the expenditure, authorising the invoice and subsequent payment to the supplier. Detailed procedures are in place to control and monitor the use of company credit cards across the Group.

- (i) When making an order commitment, orders can be placed up to the value noted in **Appendix 2 & 3**. This will need to go through a dual authorisation process - it is the second approval that the limit refers to. For example, a Housing Officer places an order for £5k, this is within their authorisation limit, but it will still need to be approved by another Officer or above. This is to ensure at some point in the invoice process there has been some segregation of duties.

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- (ii) When approving invoices, they must be authorised for payment up to the value noted in **Appendix 2 & 3**. If a purchase order has already been authorised in accordance with the above, and the invoice matches this order then the payment can be authorised. If it doesn't match or no order has been raised the invoice will go through the dual authorisation process again before being authorised for payment. In this case, again the limit is the second approval that this limit refers to. For example, a Housing Officer received an invoice for £5k but didn't place an order, this is within their authorisation limit, but it will still need to be approved by another Officer or above. This is to ensure at some point in the invoice process there has been some segregation of duties and invoices cannot be paid without two people looking at this.
- (b) When approving an invoice, the nominal ledger code must be in accordance with the approved budget heading and not changed because another original budget head is being used in order to 'vire' (i.e. off set) expenditure.
- (c) It is the responsibility of the Finance Department to:
 - Check invoice calculations
 - Ensure that the order is attached (where applicable)
 - Allocate a nominal ledger code
 - Pass the invoice to the appropriate staff member for authorisation
- (d) The person authorising the invoice must check that the nominal ledger code is correct and agree the invoice details to the original order, where applicable. If the nominal code is incorrect or the invoice has been sent to the wrong person for authorisation it must be returned to the Finance Department promptly for correction.
- (e) If the responsible officer is unavailable to authorise an invoice, it may be authorised by another member of the officer's department in line with the approval levels in **Appendix 2 & 3**.
- (f) The Finance Department will not make payments to suppliers etc, if substantiated only by statements or photocopies of invoices. If an invoice has been mislaid, a copy must be obtained from the supplier, clearly marked 'COPY' and specifically endorsed: 'Original mislaid, pay on this copy'.
- (g) It is the responsibility of each member of staff to be familiar with these expenditure authorisations and to ensure that they adhere to them.

2.1 Authorisation of Expenditure Within Budget

When committing to orders, incurring expenditure, and approving invoices, all staff are responsible for ensuring that this is kept within the approved budgets for ELHA and R3.

Approved at ELHA Board 19/03/25

2.2 Authorisation of Virements

- (a) Where a budget holder is responsible for more than one budget, they can make virements (set-off against another budget) up to the agreed level from another of their budgets with the written approval of their line manager. The Director of Finance and Corporate Services should also be advised.
- (b) Virement between budgets held by different budget holders is permitted up to the agreed level with the written approval of the transferring budget holder and the Director of Finance and Corporate Services.

2.3 Authorisation of Expenditure Outwith Budget

Spend in excess of budget may be authorised in accordance with the powers delegated to office bearers and senior staff as described in our standing orders and summarised below:

2.3.1 Summary of Financial Delegated Powers for Costs Outwith Budget

Position	Category of Expenditure	Virement Limit £	Excess Spend % of Budget or a maximum of £
Chair and Vice Chair	All	£100,000	20% / £100,000
Chief Executive, (Director of Housing & Customer Services / Director of R3 & Asset Management) and /_Director of Finance & Corporate Services jointly	All	£50,000	10% / £50,000
Managers	All	£20,000	5% / £10,000
Chief Executive (Director of Housing & Customer Services /Director of R3 & Asset Management) and /Director of Finance & Corporate Services jointly	Development cost overruns	N/A	5% of works cost / £500,00010% / £100,000
	Planned/ cyclical		

Approved at ELHA Board 19/03/25

Chief Executive/ (Director of Housing & Customer Services) or Director of Finance & Corporate Services and /Director of R3 & Asset Management or Asset Manager jointly	maintenance cost overruns	N/A	
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- NOTE:** (i) Authorisation of expenditure out-with the Annual Budget must be for purposes consistent with our policies, and expenditure in excess of £25,000 and up to £50,000 out-with budget reported at the following meeting of the Board..
- (ii) Authorisation of virements in excess of £50,000 must be reported to the next ELHA Board meeting for approval.
- (iii) In the Chief Executive’s absence, the Director of Housing & [Customer Services](#) and the /Director of R3 & Asset Management will have delegated responsibility to authorise expenditure out with budget to the limits set out above.

2.3 Authorisation of Expenditure in an Emergency Situation

In the event of an emergency affecting our offices or our properties, all members of the Business Continuity Team (listed in the Business Continuity Plans) will have complete authority to make decisions and incur financial expenditure in order to limit the loss to us or our customers.

3.0 Authorisation / Signing of Cheques, Standing Orders, Direct Debits, BACS, CHAPS Payments and Non-Supplier Transactions

- 3.1 The levels of authorisation and who is authorised to deal with cheques, standing orders, direct debits, BACS CHAPS and non-supplier transactions payments are included at **Appendix 2 & 3**.
- 3.2 When signing cheques, where possible, the signatories should be persons other than those responsible for authorising the expenditure.
- 3.3 The staff member (either the Finance Manager or the Director of Finance & Corporate Services), who was responsible for reviewing the weekly/monthly payroll should not normally also authorise the Salary BACS transfer.
- 3.4 The staff member who was responsible for preparing the payment should not normally also authorise the BACS/CHAPS transfer.

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- 3.5 Details of any exceptions to authorisation procedures (for example when it has been necessary for the Finance Manager to authorise a BACS payment for wages/salaries that they were responsible for reviewing) are recorded in the “Exceptional Authorisations Register” and reported annually to the Risk & Audit Committee
- 3.6 Non supplier bank transactions relate to:
- Advances in cash between ELHA and R3
 - Loan Repayments
 - Transfers between various ELHA and R3 RBS bank accounts
 - Transfers to Flagstone investment accounts
- 3.7 For the above purposes, the following (or their successors) are authorised signatories for the ELHA Board:

Secretary	Karen Barry
Chair	Brian Logan
Board Members	Peter Ewart, Katrina Hamilton and David Rose

4.0 Authorisation of Ex-Gratia Payments

- 4.1 Ex Gratia payments can be made in line with the authorisation levels in **Appendix 2 & 3**.
- 4.2 When a member of SMT wishes to make an ex-gratia payment they will seek agreement from the remainder of SMT and record this in the ex-gratia payments register.

5.0 Authorisation of Debit Write-Offs and Credit Write-Backs

- 5.1 All write offs of our debts (amounts owed to the Group), except individual former tenant debts, or R3 client debts as stated in **Appendix 2 & 3**, must be authorised by the ELHA Board or R3 Repairs Board respectively.
- 5.2 Where the authorised member of staff writes-off an individual tenant debt within their approval limits, the total balance written off for the Quarter will be reported in the next Quarterly Management Accounts. Where the authorised member of staff writes off an individual R3 client debt within the approved limits they will report this to the R3 Board.
- 5.3 In cases where we have no contact details for the former tenant/customer, the ELHA Board/ R3 Repairs Board may authorise the write back of credit balances held for more than one year.

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- 5.4 If a former tenant/customer credit balance is for less than £25.00 and more than one year old we will automatically write it back to the Group's accounts.

6.0 Authorisation of Refunds

- 6.1 ELHA's Housing Officers, Housing Manager and Director of Housing [& Customer Services](#) are authorised to refund all ~~current~~ ELHA tenant credit balances and Housing Benefit / Universal Credit overpayments. We will normally arrange refunds for those tenants who are in advance of one month's rent, provided the credit is not a 'Technical Credit'. Technical Credits usually arise because of the timing of payments, for example, due to Housing Benefit payment cycles or where tenants are paying weekly, fortnightly or four-weekly, to make sure there is sufficient rent in their account when it is due.

We will encourage those tenants with a small credit balance of less than a month's rent to adjust their rent payments to reduce this. Bronze Key Tenants who have their housing costs/housing benefit paid directly to us will be encouraged to have it paid to themselves. Any credit will be treated as a Technical Credit until such time as the tenant is in advance with their rent.

- 6.2 Where we have a forwarding address for former tenants/customers, and no other debt exists the, ~~the~~ Director of Housing [& Customer Services](#), Senior Management Team, Housing Manager and Housing Officer are authorised to refund ELHA credit balances in line with the limits in **Appendix 2**.
- 6.3 R3's Contracts Managers, Business Development Manager, Service Manager, Technical Manager and the Director of [R3 & Asset Management](#) are authorised to refund the following R3 customer credit balances in line with the limits in **Appendix 3**.
- 6.4 In cases where we have no contact details for ELHA former tenants/customers, the Board may authorise the write back of credit balances held for more than one year, to the Association's accounts.
- 6.5 In cases where we have no contact details for R3 former customers, the R3 Board may authorise the write back of credit balances held for more than one year, to R3 Repairs' accounts.

7.0 Procurement Policy Requirements

- 7.1 The limit values on contracts that determine what procurement route to follow are defined in the [Procurement Policy](#).

8.0 Administration Fees

- 8.1 Administration fees charged by the Group are as follows:

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Service Provided	Fee
Arrangement of buildings insurance for Owners Occupiers	£10.00 (exc. VAT)
Arrangement of services which are charged to sharing owners, owners and others	10% of service charge (exc. VAT)
Arrangement of repairs for, sharing owners or owners occupiers —discounted by £25 (exc. VAT) for prompt payment	We may charge £55 (exc. VAT)
Charge for Subject Access Request	We may charge the statutory maximum

9.0 Chargeable Repairs

9.1 We charge tenants for repairs to their homes which fall out-with those covered in the tenancy agreement. The charges for the most common of these repairs are detailed in **Appendix 5**. This list is not exhaustive and other repairs that are deemed to be required will also be charged for in line with the National Housing Federation (NHF) Schedule of Rates.

10.0 Decoration Allowances

10.1 We normally provide all new tenants in our re-lets with a paint pack, however if a new tenant prefers to receive a voucher, the value of this will be dependent upon the size of the property:

	Flats	Houses
1 bedroom	£ 220230	£ 240250
2 bedroom	£ 260270	£ 290300
3 bedroom	£ 295310	£ 305320
4 bedroom	Not applicable	£ 390405

A decoration allowance may also be awarded (at the discretion of the Property Officer inspecting the work) following maintenance work where we have damaged the tenant’s decoration. Allowances below are a guide to what may be reasonably paid.

Materials only by room	Allowance
Living Room	£ 8085
Kitchen	£ 7075
Bathroom	£ 5560
Hall	£ 4045

Approved at ELHA Board 19/03/25

Stair and Halls	£8085
Double Bedroom	£8085
Single Bedroom	£7075
Decorating Equipment	£5055

11.0 Decant / Disturbance Allowances

- 11.1 There are occasions when we may have to find temporary accommodation for our tenants because of an emergency, such as fire, flood, or structural problems. Although we will try wherever possible to avoid it, we may also have to move tenants out of their homes to allow maintenance to be carried out.
- 11.2 If ~~we move a~~ tenant ~~is moved~~ into bed and breakfast accommodation ~~by ELHA~~ we will pay a daily allowance of **£15.00** to the tenant, for each person in the household over the age of 2, to cover the costs of meals (not including breakfast which will already be paid for). This is **in addition** to the costs set out in the Temporary Accommodation and Decants Policy.
- 11.3 If ~~we move~~ a tenant ~~is moved~~ into a holiday home which is not located close to their home, we may pay them an allowance if they incur excess travel costs. This allowance is equivalent to the mileage allowance set by EVH (see section 13.1). This is **in addition** to the costs set out in the Temporary Accommodation and Decants Policy.
- 11.4 Housing Officers have the authority to commit to bed and breakfast accommodation up to the value of **£100.00** per night (based on a double room, inclusive of breakfast) or to holiday home accommodation for the same cost per night. ~~They Approval should be sought~~ Approval should be sought ~~seek approval~~ from the Housing Manager if accommodation is in excess of this sum.

12.0 Tenancy Sustainment Fund

- 12.1 The Tenancy Sustainment Fund will generally be used to directly pay for goods and services which will be provided to meet a tenant's individual requirements. ~~We may provide vouchers w~~ We may provide vouchers w ~~here goods cannot be sourced by ELHA-us directly, vouchers may be provided.~~
- ~~We will cap a~~ Awards ~~will be capped~~ to the value of **£250.00** unless in exceptional circumstances. Housing Officers, the Housing & Community Outreach Worker or Money & Home Energy Adviser can make awards up to this value. Anything above should be approved by the Housing Manager.

13.0 Staff Allowances

- 13.1 ELHA Staff are entitled to claim a number of allowances in line with their terms and conditions of employment. The rates for these allowances are set annually by EVH, and an extract of those most regularly used by staff are detailed below. Unless otherwise stated, all allowances are subject to PAYE/NI.

Approved at ELHA Board 19/03/25

ELHA Allowances

Description	Allowance
First Aid	£ 577606 per annum
Spectacles (Excess over amount recoverable from Simplyhealth)	£ 120.88415.02 per annum less amount recoverable from Simplyhealth
Essential Car Users Allowance	£ 1,79508 per annum
Essential Car Users Allowance – Electric Vehicle	£5, 385424 per annum
Mileage up to 10,000 miles	45p (tax free)
Mileage over 10,000 miles	25p (tax free)
Mileage (all) for an Electric Vehicle supplied through the ELHA salary sacrifice scheme	15p (amount above <u>HMRC tax free rate 7p</u> subject to PAYE and NI)
Passengers per mile in own car (not for EV's supplied through the ELHA salary sacrifice scheme)	5p (tax free)
Subsistence if engaged on Group business for a period of more than 10 hours	£ 21.910.85
Subsistence if engaged on Group business for a period of between 5-10 hours out-with the area	£ 13.4142.76
Mobile phone allowance <u>(if opted not to take a company phone)</u>	£240 per annum

13.2 R3 Repairs Staff are entitled to claim a number of allowances in line with their terms and conditions of employment. Some of the rates for these allowances are based on ELHA rates. An extract of those most regularly used by staff are detailed below. Unless otherwise stated, all allowances are subject to PAYE/NI.

13.3 R3 Repairs Allowances

Description	Allowance
First Aid	£ 606577 per annum (£11. 6540 per week or £ 50.0548.03 per month)
Spectacles (Excess over amount recoverable from Simplyhealth)	£ 120.88415.02 per annum less amount

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	recoverable from Simplyhealth
Car Allowance	£4,500 per annum
Mileage up to 10,000 miles and no car allowance	45p (tax free)
Mileage over 10,000 miles or below 10,000 miles with car allowance	25p (tax free)
Passengers per mile	5p (tax free)
Subsistence if engaged on Group business for a period of more than 10 hours	£ 21,910.85
Subsistence if engaged on Group business for a period of between 5-10 hours out-with the area	£ 13,4142.76

13.4 ~~Included at Appendix 6 includes are~~ a list of job roles that qualify for the fixed annual allowances in the tables above, being Essential Car User/Essential Car User EV and mobile phone allowances for ELHA. Appendix 6 also includes those R3 job roles that qualify for a Car Allowance.

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13.5 All other allowances above ~~are can be~~ claimed based on staff fulfilling a duty as part of their role or reclaiming an allowance for an expense incurred on ~~Group business~~, that meets the criteria in the tables above.

13.6 The allowances for subsistence are payable at the rates noted above without the requirement of a receipt. The full flat rate is payable if claimed. Depending on what the subsistence is for, some or all the allowance is taxable on the recipient.

13.7 Staff can ~~however~~ claim for subsistence expenses by providing receipts up to the value incurred, to a maximum value in the table above. This will not be taxable.

13.8 If staff want to claim ~~Where allowances are to be claimed, they should do this is done~~ through expenses on People HR.

14.0 Staff Call-Out Rates

14.1 Call-Out Rates (ELHA) (Physical Attendance)

ELHA staff who are called ~~out of normal working hours~~ to attend an emergency ~~out of normal working hours~~ are entitled to claim an additional payment. The current rates for these additional payments are as follows:

Time of Call-Out	Hourly Rate
During Annual Leave (08.01hrs to 20.00hrs)	Hourly rate x 1.5
Day (Office shut) - 08.01hrs to 20.00hrs	Hourly rate x 1.5
Night - 20.01hrs to 08.00hrs	Hourly rate x 2

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20.01hrs on 24 Dec. to 08.00hrs on 26 Dec.	Hourly rate x 3
20.01hrs on 31 Dec. to 08.00hrs on 2 Jan.	Hourly rate x 3

14.1.1 Minimum Call-Out Fee

The minimum call out payment will be two hours at the applicable rates above. After this, each hour (or part thereof) will be paid at the relevant hourly rate, rounded up to the next hour

14.1.2 Out of Hours Fire Alarm Activation

Where staff are called ~~out of hours~~ to a fire alarm activation out of hours, two people must attend. The first person called may opt to bring a second adult with them to the call out, for example their partner or a relative, in accordance with the Fire Alarm Activation Procedure. If this happens, they will be paid 150% of their normal callout allowance. If this is not possible, a second ELHA employee from the list will be called to attend, with both staff members receiving the normal allowance each.

14.2 Contact But No Call-Out Required Telephone or Text response

ELHA staff who are contacted out of normal working hours, or during a period of agreed annual leave, by telephone or text, but are not required to attend the office or site are entitled to claim an additional payment.

This would also include someone who, following a call or text, is required to log onto the network remotely to take action.

~~The fee for if you respond~~ responding to a call or text that does not require a physical attendance, you will be paid at the rate of £16 for the first call or text and £8 for subsequent calls or texts received or made for the same incident, up to a maximum of £56 for one incident. If the level of work required is such that this maximum is exceeded, then you will be paid overtime ~~will be paid~~ instead, in line with the table at 14.1.

If you are contacted a ~~n~~ At night (as defined at 14.1), the payment will be £24 for the first call or text and £12 for subsequent calls or texts to a maximum of £84.

If you are contacted a ~~a~~ At Christmas and New Year (as defined at 14.1), the payment will be £32 for the first call or text and £24 for subsequent calls or texts to a maximum of £112.

Redirecting a call or text to a colleague or another service will attract a flat payment of £12 irrespective of time or date.

14.3 Staff Standby Rates (R3 Repairs)

The rates below will apply to work undertaken as a result of attendance at a call out while on Standby duty:

Approved at ELHA Board 19/03/25

Standby / Call Out Duties	Rates
Standby full week Inclusive	£ 120.00
Standby per day, Monday to Friday	£ 12.00
Standby Saturday Only	£ 24.00
Standby Sunday Only	£ 36.00
Call Out when not on standby	£18.00

14.4 Claiming Additional Payments

If you are called out to an emergency, you should record the time you have worked on your timesheet in People HR and then record the time spent and relevant hourly rate as an assignment (See Section 14.1). You can find details on how to claim an additional payment in the People HR procedures.

If you have been contacted by phone or text out with office hours as described in Section 14.2, you should claim the additional payment as an expense through People HR.

14.5 Pre-Arranged Out of Hours Work

Some staff are required to work out with office hours, subject to agreement with their Line Manager, e.g. to attend an evening meeting. Such work will normally form part of flexi arrangements and staff will not be paid for overtime. Where it does not form part of someone's job description or flexible arrangements, then the rates noted above will be applied, and staff should claim this payment as noted in section 14.4.

15.0 Board Member Allowances

15.1 ELHA Board Members and R3 Repairs Board Members are entitled to claim a number of expenses in line with Policy.

15.2 The rates in the table below are within the HMRC Approved Benchmark Scale Rates and are tax free. The current rates for these are as follows (receipts are not required):

Description	Allowance
Mileage up to 10,000 miles	45p
Mileage over 10,000 miles	25p
Passengers per mile	5p
Subsistence - breakfast (when individual has to leave home before 6am)	£5
Subsistence - lunch if engaged on Group business for a period of between 5-10 hours	£5
Subsistence – meal if engaged on Group business for more than 10 hours	£10
Subsistence - Late evening meal (individual won't get home before 8pm)	£15
Subsistence – evening meal rate (when the individual is going to incur an overnight stay)	£25

Approved at ELHA Board 19/03/25

Note, these are the maximum claims that can be made if reimbursement of expenses is claimed as an allowance.

- 15.3 Where ELHA Board Members and R3 Repairs Board Members are incurring subsistence costs higher than the allowance rate, they can do so by providing an expense claim with receipts that support this claim. The costs incurred must be wholly and exclusively for the purposes of ELHA/R3 business. A further claim for an allowance cannot be made if an actual claim is made.
- 15.4 ELHA Board Members and R3 Repairs Board Members can incur other out of pocket expenses costs by providing an expense claim with receipts that support this claim. The maximum value of the claim per day is £15. The costs incurred must be wholly and exclusively for the purposes of ELHA/R3 business.

16.0 Capitalisation of Expenditure

- 16.1 The Group has a level below which items of expenditure should not be capitalised. The current level is **£1,000**. This value is based on individual items only. For example, if 10 mobile phones were purchased at £150 each, costing £1,500, this would not be capitalised given the individual asset are less than £1,000.

17.0 Rental Income

- 17.1 The rental income per point for the year from 1 April to 31 March is ~~176.04168-78~~ pence.
- 17.2 The 'Bronze Key Tenant discount' will be £10 per month for tenants who meet the required criteria.
- 17.3 The "Gold Key Tenant discount" will be £20 per month for tenants who meet the required criteria.
- 17.4 The "Platinum Key Tenant discount" will be £30 per month for tenants who meet the required criteria.
- 17.5 The "Diamond Key Tenant discount" will be £50 per month for tenants who meet the required criteria.
- 17.6 The "My New Home tenant discount" will be the full first month's rent.

17.7 The "Shared Ownership Paper Free discount" will be £5 per month for tenants who meet the required criteria.

18.0 Fair Work First Statement

- 18.1 There are several Schedules within the new style offer of grant from the Scottish Government for new build projects, that need to be signed at the appropriate time for a project.

Approved at ELHA Board 19/03/25

18.2 One of these is Schedule 5 - Project Completion. This includes a Fair Work First Survey Completion. This is contained within **Appendix 4** of this policy. This is Employers in Voluntary Housing model document.

18.3 The Director of Finance & Corporate Services will review this document annually, with any amendments being made as part of this policy review

19.0 Policy Review

19.1 The Director of Finance & Corporate Services will review this policy annually, with any material amendments required being submitted to the [ELHA](#) Board for approval.

	Board		SMT				Manager	All Other Staff	Places for People
	Chair	Board Member	CE	Director of Finance & Corporate Services	Director of R3 & Asset Management	Director of Housing & Customer Services			
LEGAL									
Deeds, Dispositions & Documents (in line with Requirements of Writing Policy)	✓	✓	N/a	N/a	N/a	✓	N/a	N/a	N/a
Contracts < or equal to 5 Years	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
Service Level Agreements & Leases	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
TAXATION									
Taxation Documentation	✓	✓	✓	✓	N/a	N/a	N/a	N/a	N/a
REGULATORY									
Scottish Housing Regulator	✓	N/a	✓	✓	✓	✓	N/a	N/a	N/a
DEVELOPMENT									
Scottish Government Grant Approvals (incl Allia Charitable Bond Scheme)	✓	N/a	✓	✓	✓	✓	N/a	N/a	N/a
Offer of Grant Funding	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
Programme Agreements	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
Acquisition Applications	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
Tender Applications including Housing Tender Returns	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
Housing Association Grant (HAG)/Practical Completion (PC) Applications	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
Schedule 2 – Statement of Compliance with Conditions of Grant	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
New Build Schedule 4 – Procurement Improvement Programme: Statement of Compliance	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
Schedule 5 - Project Completion – this includes Fair Work First Survey Completion and stating name of provider to undertake the Value for Money Assessment	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
Schedule 6 - Value for Money in New Build Affordable Housing; Statement of Compliance	N/a	N/a	✓	✓	✓	✓	N/a	N/a	✓
OTHER									
Loan Agreements	✓	✓	✓	✓	N/a	✓	N/a	N/a	N/a
Minutes of Agreement	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
Standard Securities	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
Wayleave	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
Loan Drawdowns	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
FCA Submission	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
Share Certificates	✓	✓	✓	N/a	N/a	✓	N/a	N/a	N/a
Auditors Letter	✓	✓	N/a	N/a	N/a	✓	N/a	N/a	N/a
Annual Accounts	✓	✓	N/a	N/a	N/a	✓	N/a	N/a	N/a
Staff Contracts of Employment (Below CE)	✓	✓	✓	✓	✓	✓	✓	N/a	N/a
CE Contract of Employment	✓	✓	N/a	N/a	N/a	✓	N/a	N/a	N/a
Staff Settlement Agreements	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a
Non-Disclosure / Confidentiality Agreements	✓	✓	✓	✓	✓	✓	N/a	N/a	N/a

	Board	SMT		Managers		Asset Management						
	Board Member	CE	Director	Finance Manager	All Other Managers	Property Officer & Safety & Compliance Officer	Assistant Property Officer	Housing Officer	Care Repair Officer	Senior/Executive Support Officers, Digital Services Officer, Customer Services Advisor, Assistant Housing Officer, Housing & Community Link Officer & Money Advice Officer	Finance Officer, Senior Finance Assitant/Finance Assitant & IT Officer/Senior IT Assistant	Purchase Ledger Assistant, Modern Apprentice
Approval of Commitment/Order	Unlimited	Unlimited	£500k	£50,000	£50,000	£10,000	£5,000	£5,000	£5,000	£2,500	£200	N/a
Authorisation of Invoice	Unlimited	Unlimited	£500k	£50,000	£50,000	£5,000	N/a	£2,500	£2,500	N/a	N/a	N/a
Authorise Payments Without Invoice	Unlimited	£100k	£100k	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Rent Refund - Current Tenants	N/a	N/a	Unlimited	N/a	Unlimited	N/a	N/a	Unlimited	N/a	N/a	N/a	N/a
Rent Refund - Former Tenants	N/a	> £750	> £750	> £750	> £750	N/a	N/a	> £300	N/a	N/a	N/a	N/a
Cheques (2 Required)	Unlimited	Unlimited	Unlimited	Unlimited	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Direct Debit/Standing Order/Mandate (2 Required)	Unlimited	Unlimited	Unlimited	Unlimited	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Salary BACS Payment (2 Required)	Unlimited	Unlimited	Unlimited	Unlimited	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
BACS/CHAPs (2 Required)	Unlimited	Unlimited	Unlimited	Unlimited	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non-Supplier Transactions (1 Required)	Unlimited	Unlimited	Unlimited	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Credit Card Limits	N/a	£10k	£10k	£3k	N/a	£3k	N/a	N/a	N/a	N/a	N/a	N/a
Electronic Credit Card Limits - Transaction	N/a	N/a	N/a	£1,000	£1,000	£1,000	N/a	N/a	N/a	N/a	N/a	N/a
Electronic Credit Card Limits - Monthly Limit	N/a	N/a	N/a	£2,500	£2,500	£3k	N/a	N/a	N/a	N/a	N/a	N/a
Write Offs - Under £25	N/a	£25	£25	£25	£25	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Write Offs -£25 and Over	Unlimited	£750	£750	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Ex Gratia Payments	Unlimited	£1k	£1k	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a

Values above exclude VAT

Departmental Managers include the following posts: Care & Repair Manager, Housing Manager, Data & Technically Manager, Customer Services Manager & Asset Manager

ELHA Fair Work Statement, September 2023

1.0 Introduction & Commitment to Fair Work First

ELHA is a full member of Employers in Voluntary Housing (EVH), and is therefore part of the collective bargaining arrangement that EVH have with UNITE the union. This means that ELHA recognise UNITE through this arrangement. EVH terms and conditions of employment have provisions within them to encourage and support trade union membership for staff. Along with support for those carrying out official duties for the union. In addition, internally we hear from staff through our Joint Consultative Committee (JCC – which includes Governing Body Members) on collective engagement matters and through our staff engagement software (Hive).

There is significant investment in colleague development through both digital methods and more traditional learning routes. This investment includes appropriate financial support to employees to complete qualifications relevant to their job roles along with paid time off when appropriate. The organisation actively invests in developing early careers through apprenticeships. We have successfully converted five apprenticeships into full time roles in recent years.

There are no zero-hour contracts within ELHA. We do retain some colleagues on bank contracts to cover workloads during unplanned absences, or periods of high work volumes, but these are not the norm.

EVH salary scales are supported by a job evaluation system. This system is based on typical characteristics for the role and looks at the job, not the postholder. This ensures fair and transparent arrangements for pay which has been negotiated and agreed with the Trade Union. We have also developed a sector leading piece of software that will collate Equality data from staff to ensure we deliver on the aims and objectives of our Equalities and Diversity policy.

The bottom point of the EVH pay scales is the Real Living Wage.

The formal Flexible Working procedure is not currently accessible to colleagues in the first 26 weeks of employment. In reality, the majority of requests we receive are resolved informally between the colleague and their line manager. Flexibility is now a standard feature of many roles in terms of both work location and hours of work, reflecting our needs as a modern, geographically-dispersed organisation providing accessible, online services 24/7.

EVH terms and conditions of employment set out enhanced terms for a range of family friendly policies, including the following:

- Maternity Leave
- Paternity Leave
- Shared Parental Leave
- Adoption Leave

EVH terms and conditions set out compassionate and other special leave available to staff members which are supportive to promoting a positive work life balance. Whilst in some examples there may be a need to terminate a colleague's contract and offer re-engagement on new terms, these would be a minority and there have been no instances of this within the previous three years. ELHA would not intend to use widespread "fire and rehire" approaches and would look to agree any changes with colleagues through consultation to get feedback, consider alternative options and look to seek agreement to the change.

2.0 Fair Work First Publication

We are members of Employers in Voluntary Housing (EVH) and used their model Fair Work First Statement in preparing our own, which we publish on elha.com.

3.0 Embedding Fair Working Practices

We will:

1. Continue our membership with Employers in Voluntary Housing (EVH). This will continue the relationship with UNITE.
2. Continue our JCC to allow colleague engagement on collective matters.
3. Continue to invest in colleague development through both digital methods and more traditional learning routes.
4. Continue to invest in developing early careers through apprenticeships.
5. Avoid zero hour contracts and will only consider these contracts where this is necessary and where the work is genuinely carried out on a casual basis.
6. Through EVH, have salary scales that are supported by a job evaluation system. This system will be based on typical characteristics for the role and looks at the job, not the postholder. This will be agreed with the trade unions.
7. Through EVH, continue to implement the real Living Wage foundation rate across all colleagues, regardless of age or the basis of their contract.
8. Continue to operate and review our formal Flexible Working procedure.
9. Not intend to use widespread "fire and rehire" approaches and look to agree any changes with colleagues through genuine and meaningful consultation to get feedback, consider alternative options and look to seek agreement to the change.

List of Chargeable items

Repair	Amount (Exc. VAT)	VAT 20%	Amount (Inc. VAT)
Force Entry	£90.00	£18.00	£108.00
Force Entry & Change Lock	£90.00	£18.00	£108.00
Force Entry & Change both Locks	£140.00	£28.00	£168.00
Board up Window (Emergency Call Out)	£40.00	£8.00	£48.00
Board up Window	£80.00	£16.00	£96.00
Reglaze window Single Glazed Approx 2.1sqm	£110.00	£22.00	£132.00
Reglaze window Double Glazed Approx 2.1sqm	£250.00	£50.00	£300.00
Check Electrics	£270.00	£54.00	£324.00
Call Out (Aborted visit due to e.g. no access or non-emergency work)	£90.00	£18.00	£108.00
Replace WC. Note 3	£225.00	£45.00	£270.00
Replace WC and Cistern. Note 3	£440.00	£88.00	£528.00
Replace Wash hand basin.	£365.00	£73.00	£438.00
Replace Wash hand basin Pedestal.	£125.00	£25.00	£150.00
Replace Bath.	£755.00	£151.00	£906.00
Renew damaged passage doors (Per unit cost).	£190.00	£38.00	£228.00
Renew damaged worktop (per metre cost). Non sink top side.	£85.00	£17.00	£102.00
Renew damaged worktop (per metre cost). Sink top side which requires sink top removed and refitted.	£155.00	£31.00	£186.00
Patch damaged internal door (Per Unit Cost)	£70.00	£14.00	£84.00
Renew Damaged Wall Unit Door (Per unit cost).	£85.00	£17.00	£102.00
Renew Damaged Base Unit Door (Per unit cost).	£100.00	£20.00	£120.00
Renew Damaged / Missing Base Unit Plinth (Per unit cost)	£20.00	£4.00	£24.00
Renew wall or base unit Drawer front or door (Per unit cost)	£85.00	£17.00	£102.00
Replace missing skirting (Per metre cost)	£30.00	£6.00	£36.00
Renew acrylic or ply bath panel (Per unit cost)	£80.00	£16.00	£96.00
Replace non standard or fit missing internal door handle (unit cost)	£30.00	£6.00	£36.00
Uplift & dispose of tenant floor coverings (unit cost)	£110.00	£22.00	£132.00
Clear tenant left contents from dwelling including outbuildings (average cost)	£400.00	£80.00	£480.00
Clear tenant left contents from outbuildings including shed/s (average cost)	£120.00	£24.00	£144.00
Dispose of garden shed (if in poor condition).	£170.00	£34.00	£204.00
Sparkle Clean.	£380.00	£76.00	£456.00
Strip wallpaper and leave prepared for decoration (per room cost)	£275.00	£55.00	£330.00
Remove tenant light fitting and fit pendant (unit cost).	£25.00	£5.00	£30.00
Renew single / double electrical outlet plate (average cost) Damaged / Non standard or paint damage.	£15.00	£3.00	£18.00
Renew single / double electrical switch plate (Unit cost) i.e. Damaged / Non standard or paint damage.	£15.00	£3.00	£18.00
Plaster repair to damaged wall (Total combined patches not exceeding 1 square m)	£30.00	£6.00	£36.00

Notes

1. This list is not exhaustive and other repairs that are deemed to be required will also be charged for based upon the National Housing Federation (NHF) Schedule of Rates.
2. These costs **do not include the administration charge** for the arrangement of the repair and are intended to compensate the Group for the labour and material costs of the repair only.
3. Where more specialised equipment is damaged, i.e. low level, close coupled WC's or level access showers, the actual cost of the replacement plus any administration fee will be charged.

	Essential Car User	Essential Car User - EV	Mobile Phone Allowance
Asset Manager	✓	If An Essential Car User & Has Company EV	✓
Assistant Housing Officer	x	If An EV Is Taken	x
Assistant Property Officer	x	If An Essential Car User & Has Company EV	✓
Care & Repair Manager	✓	If An Essential Car User & Has Company EV	✓
Care & Repair Officer	✓	If An Essential Car User & Has Company EV	✓
Chief Executive	✓	If An Essential Car User & Has Company EV	✓
Customer Services Advisor	x	If An EV Is Taken	x
Customer Services Manager	x	If An EV Is Taken	x
Data & Technology Manager	x	If An EV Is Taken	✓
Digital Service MA	x	If An EV Is Taken	✓
Digital Services Officer	x	If An EV Is Taken	✓
Director of Finance & Corporate Services	✓	If An Essential Car User & Has Company EV	✓
Director of Housing	✓	If An Essential Car User & Has Company EV	✓
Director of R3 & Asset Management	✓	If An Essential Car User & Has Company EV	✓
Executive Support Officer (Governance)	x	If An EV Is Taken	x
Executive Support Officer (HR)	x	If An EV Is Taken	x
Finance Assistant (R3)	x	If An EV Is Taken	x
Finance Manager	✓	If An Essential Car User & Has Company EV	✓
Finance Officer	x	If An EV Is Taken	x
Housing & Community Link Officer	✓	If An Essential Car User & Has Company EV	✓
Housing Manager	✓	If An Essential Car User & Has Company EV	✓
Housing Officer	✓	If An Essential Car User & Has Company EV	✓
IT Officer	✓	If An Essential Car User & Has Company EV	✓
Modern Apprentice	x	If An EV Is Taken	x
Money Advice Officer	x	If An EV Is Taken	✓
Property Officer	✓	If An Essential Car User & Has Company EV	✓
Safety & Compliance Officer	✓	If An Essential Car User & Has Company EV	✓
Sales and Purchase Ledger Assistant	x	If An EV Is Taken	x
Senior Executive Support Officer	x	If An EV Is Taken	x
Senior Finance Assistant	x	If An EV Is Taken	x
Senior IT Assistant	✓	If An Essential Car User & Has Company EV	✓

Car Allowance

Assistant Materials Co-ordinator	x
Storeman	x
Contracts Manager	✓
Site Manager	x
Repairs Administrator	x
Repairs Administrator - MA	x
Repairs Administrator - Team Leader	x
Head of Operations	✓
Operational Support Manager	x
Trades Operatives	x

Entitlements, Payments and Benefits Policy Review

Report by Martin Pollhammer, Chief Executive – for Approval

1.0 Introduction

The Model Entitlements, Payments and Benefits Policy has been revised by the Scottish Federation of Housing Associations (SFHA). These proposed amendments have been incorporated into the Association's Policy and are presented for approval.

2.0 Summary of Proposed Changes

All proposed changes follow the changes proposed to the Model Policy Document published by the SFHA. Whilst there is some general tidying up and updating undertaken, the substantive changes relate to how the award of large contracts are made under procurement legislation. The previous Model Policy conflicted with procurement regulations in that it may have excluded some bidders that under the terms of the procurement legislation would be entitled to bid for and secure such contracts.

ELHA rarely tenders such contracts, and when it does so, ensures compliance with procurement law and regulation, often by using external advisors to support the process. In practice, these changes are unlikely to have any significant material impact on the Association.

Whilst the Senior Management Team has delegated authority to approve minor changes to this Policy, it was felt that the ELHA Board should be asked to approve these changes given there are a large number of amendments, and also given the particular importance of this Policy within the overall regulatory framework.

Recommendation

The ELHA Board is asked to approve the revised Entitlements, Payments and Benefits Policy.

ELHA POLICY

Date Issued	December 2015
Date Last Updated	March 2026
Department	Corporate
Title	Entitlements, Payments and Benefits Policy
Objective	To describe the entitlements, payments and benefits that our staff and ELHA Board Management Committee members can receive
Responsible	ELHA Board Management Committee
Next Review Date	March 2031

1.0 Introduction

This policy is based on the model document published by the Scottish Federation of Housing Associations in June 2021~~15~~ and updated in Jan 2026 with revisions by Linda Ewart, commissioned by the SFHA, revised in 2024.

Who the Policy Affects

1.1 This policy is aimed at:

- All members of our ~~ELHA Board~~~~Management Committee~~ and of the R3 Board
- Everyone who works or volunteers for us or R3

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

Why we have this Policy~~About This Policy~~

1.3 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, partners or funders. We must ensure that our organisation upholds its reputation and that of the sector. We have to ensure that our people cannot benefit, or be seen to benefit, inappropriately from their connection to us. Equally, we must protect our people from unjustified criticism and ensure that, wherever possible, no one is unfairly disadvantaged by their connection to us.

- 1.4 This policy describes the entitlements, payments and benefits that our people are able to receive. It also describes what is not permitted (and why) and the arrangements that we have in place to ensure that we are transparent and accountable in how we comply with the requirements of this policy and our regulators are observed.
- 1.5 Our Rules require that we have a policy dealing with payments and benefits. 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. We must ensure there is no justifiable public perception of impropriety. This Policy is based on the SFHA's Model Entitlements, Payments and Benefits Policy which the SHR have confirmed meets their regulatory requirements.
- 1.6 As we are a Scottish Charity, all of our ELHA Board Management Committee Members must also ensure that they comply with the Office of the Scottish Charity Regulator (OSCR) guidance to Charity Trustees and charity legislation.
- 1.7 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 benefits (or is seen to 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.
- 1.8 As someone who is affected by this policy, you are personally responsible for ensuring that you are familiar with and comply with its terms. You are also responsible for ensuring that the Register of Interests is always up to date: declaring interests that are relevant to your role with us is key to the effective implementation of this policy.
- 1.9 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 Chief Executive (if you are a member of the ELHA Board Management Committee) or with your line manager (if you are a member of staff).

What this Policy Covers

- 1.10 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

Other Relevant Policies

- 1.11 The Code of Conduct is linked to this policy. Failure to comply with the terms of this policy may be regarded as a breach of the Code of Conduct.
- 1.12 You are also required to be familiar with and observe the terms of our Anti-Bribery and Fraud 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.
- 1.13 Our policies relating to the following are also relevant to this document and must be complied with at all times:
- Gifts and Hospitality (the policy that sets out the circumstances in which gifts and hospitality can / cannot be offered and / or accepted and the relevant values, taking account of the table at Section 6)
 - Notifiable Events
 - Allocations
 - Repairs and Improvements
 - Adaptations
 - Procurement
 - Training
 - Expenses
 - Recruitment
 - Sale / Disposal of our Property
 - Severance and Settlement Agreements
 - Donations
 - ~~Decoration Allowances / Prizes~~
 - ~~Gifts and Hospitality~~

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

2.0 Managing Your Interests

Registering and Declaring Interests

- 2.1 ~~Being open about any interests that our people have that are relevant to their role with us is critical in order to protect our reputation. Our Register of Interests and helps to ensure 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 and/or our activities. You ~~must will be required to~~ maintain the accuracy of the interests you declare and ~~to~~ confirm annually that your entry in the Register is accurate and up to date.
- 2.2 ~~Our Rules require that any ELHA Board member who has an interest in a matter that is being considered withdraws from all discussions and plays no part in decision-making. Where you have a personal or business interest in any matter that is being discussed or considered, including at a meeting, (or someone connected to you has), you must declare your interest and play no part in the consideration, discussion or and decision making; where appropriate, you must withdraw from any part of a meeting where the interest arises. This requirement does not apply to ELHA Board members who are tenants where matters are being considered that relate to policy implementation affecting all or a substantial number of the Association's tenants (e.g. rent increases). The requirement to withdraw relates to matters in which someone affected by this policy has an individual interest e.g. where they are a tenant of a property that is being considered for exceptional treatment (e.g. associated with RAAC) and that a decision will have an individual and personal impact on. If a Board Member who has a conflict of interest shares factual information about the matter with the Chair (or any other Board member), outwith the meeting to inform discussion, that must be declared to the meeting and the Chair must ensure that it does not influence the outcome and decision-making. and play no part in the discussion. Our Rules require that any Management Committee Member who has an interest in a matter that is being considered withdraws from all discussions and plays no part in the decision making.~~
- 2.3 ~~Constitutional Standard 23 requires a RSL to ' have a clear process to identify and address any conflicts of interest'. This policy has been endorsed by the Scottish Housing Regulator (SHR) and so complies with regulatory requirements.~~

2.4 The Codes of Conduct which our ~~ELHA Board Management Committee~~ Members and staff are required to uphold contain requirements about ~~d~~Declaring ~~t~~interests that you should ensure you are familiar with and comply with at all times.

2.54 An annual report will be made to our ~~ELHA Board Management Committee~~ on the entitlements, payments, benefits that have been recorded in the Register(s) by our people.

2.65 The following are examples of the kind of interest that you must declare and ensure is managed appropriately.- Please note that this list is not exhaustive, and there may be other interests that you should declare.

- Tenancy of a property of which we are the landlord
- Occupancy or ownership of a property which is factored or receives property related services from us
- Receipt of care or support services from us
- Membership of a community or other voluntary organisation that is active in the areas we serve
- Voluntary work with another RSL or with another organisation that does, or is likely to do, business or engage with us
- Membership of the governing body of another RSL
- Being an elected member of any local authority where we are active
- If you purchase goods or services from us
- If you purchase goods or services from one of our contractors or suppliers (see Section 4.0 and our **“Use of Association Contractors / Suppliers Declarations” Procedure for more details**)
- Significant shareholding in a company that we do business with (or are considering doing business with)
- Membership of any other body whose interests and/or activities may directly affect our work or activities

- Ownership of any land or property in our areas of operation. ~~(This excludes property for the purpose of your own residential use; i.e. there is no requirement for you to declare any house in which you currently live).~~
- Unresolved dispute relating to the provision of services in connection with a tenancy or occupancy agreement or a contractual dispute over the provision of goods or services with us

2.76 You should ~~be aware~~~~note~~ that in some limited circumstances, it is not possible to manage an interest effectively. Examples of an interest that cannot be managed effectively include – but are not limited to:

someone who is a member of the ELHA Board or closely connected to an ELHA Board member cannot apply for or be appointed to a staff role or be engaged to provide goods or services to the RSL

someone who is closely connected to an employee cannot become a member of the Governing Body

a senior member of staff or office bearer cannot be an elected member of a local authority which the RSL engages with.

In some circumstances, specific measures will be required to ensure that the probity and reputations of the organisation and its people are safeguarded e.g. by ensuring that all employment is undertaken openly and transparently and without the involvement of anyone connected to any applicant; by ensuring that employees who are connected are not line-managed (directly or indirectly) by the person they are connected to – if this is not possible, the benefit (employment offer) cannot be conferred. Confirming that all interests are openly declared at the start of recruitment and procurement processes will assist in avoiding a breach of the policy and / or Code of Conduct or compromise regulatory compliance.

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~~declaration of an interest may not be sufficient, and it may be necessary for the organisation to take additional measures to deal satisfactorily with the situation so as to protect the probity and reputations of both yourself and the organisation.~~

Entitlements, Payments and Benefits

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

2.98 As one of our people, you are entitled to receive payments and benefits in accordance with the terms of our policies and, for staff, employment contracts. ~~There are occasions where you potentially~~ could be offered benefits over and above ~~what that to which~~ you are ~~contractually~~ entitled ~~to (as a result of policy or contractual terms)~~, such as gifts or hospitality from external parties. ~~These~~ ~~Such~~ offers would be ~~directly because as a direct result of~~ you ~~are 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.

2.109 Apart from payments that our people are entitled to by contract, statute, policy 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~~ The table at section 6 explains the payments we can and cannot make in more detail.

2.110 As we contribute to the economy of the area 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.

2.124 ~~There are s~~—Some entitlements, payments and benefits that we can never permit, and others where we have additional requirements or conditions that must be met before we can permit.

2.132 The table at Section 6~~Appendix A~~ lists the entitlements, payments and benefits that fall under this policy, and states:

- Which ~~can~~could be permitted by the organisation
- Which will not~~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

3.0 People Connected ~~to~~ You

Who Else You Should Consider When Declaring Interests

3.1 ~~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.~~

Someone 'closely connected' to you includes members of your household, family members and other relatives and your friends

3.2 ~~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 ~~relevant such~~ actions, are outlined in Table A below. If you are in any doubt about whether or not a declaration is required, ~~ELHA Board Management Committee~~ Members should consult the Chair or Chief Executive, and staff should consult their line manager.

~~3.2~~

TABLE A: People who are Closely Connected to one of Our People

Group	Required Response
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<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 <u>promptly</u> identify, declare and manage these.</p>
<p>2. Partner, Relatives and friends</p> <p>This includes:</p> <ul style="list-style-type: none"> • Your partner (if not part of household) • Your relatives and their partners • Your partner’s close relatives (i.e. parent, child, brother or sister) • Your friends • Anyone you are dependent upon or who is dependent upon you 	<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 /or 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>

What You Need To Consider

3.3 The following are the actions and involvement by those to whom you are closely connected that you should consider, declare and manage as per our expectations outlined in Table A (please be aware that this list is not exhaustive or exclusive and that some interest and their potential conflicts cannot be reconciled with the purpose and terms of this policy):

- A significant interest in a company or supplier that we do business with or which is on our approved list. 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 or supplier with which we do business with (or are considering doing business with) or is on our approved list
- Involvement in the management of any company or supplier that we do business with or which is on our approved list
- Involvement in tendering for or the management or delivery of any contract for the provision of goods or services to us.
- Application for employment with us.
- Application to join our ELHA Board Management Committee or R3 Board
- Application to be a tenant or service user of the organisation or any of its subsidiaries.

4.0 Use of Our Contractors & Suppliers

- 4.1 In order to help us maintain our excellent reputation, it is important that staff and ELHA Board Management Committee members do not use their position to gain benefits which other members of the public cannot access.
- 4.2 At the same time we do not want to see staff and ELHA Board Management Committee members face unreasonable restrictions which put them at a disadvantage compared to other members of the public.
- 4.3 Where, in your personal / home life, you as a staff or ELHA Board Management Committee member need a service from a contractor, if it causes no disadvantage or inconvenience to you to avoid using one of the Association's contractors then we would ask that such use is indeed avoided. But the Association does not want to unreasonably restrict your choice of contractor.
- 4.4 However, it is extremely important that where you wish to use one of the Association's contractors you take some particular steps which will help protect both you and the Association.
- 4.5 A staff or ELHA Board Management Committee member should only utilise the services of one of the Association's contractors (as listed at Appendix B) for their own personal needs if:

- The normal commercial rates are paid for this service and no preferential treatment in terms of price, quality or any other aspect of service delivery, financial or otherwise, is received
- You report your proposed course of action to your departmental director or the Chair (as appropriate) before committing to use the contractor in question and follow any advice offered. In emergency situations you should comply with this policy retrospectively as soon as is practicably possible
- You make a written declaration as set out in the Use of Association Contractors / Suppliers Declarations Procedure that you have not received any advantage or preferential treatment (financial or otherwise) from the contractor or supplier arising out of their connection to the Association: written quotes should be provided where these would normally be sought for the type of work in question, and in ALL cases receipts should be provided
- You record the transaction or agreement in the Register of Payments and Benefits and keep the entry up to date

4.6 Examples of situations that might arise in this context include use of R3 Direct services that are made available to the general public by our subsidiary company R3 Repairs Limited, or buying goods or services from a connected business such as an architect or building contractor.

For the avoidance of doubt, no other use of R3 services may be made by staff or ~~ELHA Board Management Committee~~ members – only R3 Direct services can be used. It should also be noted that prior approval is required before “Large Jobs” can be ordered through R3 Direct. More detail of the approval and declaration processes (including the forms to be used) for both the use of R3 Direct-, and other contractors and suppliers, can be found in the “Use of Association Contractors / Suppliers Declarations” Procedure.

4.7 Appendix B lists the contractors to whom this policy applies. You will see that it does not include low value services such as sandwich shops, other high street stores and national chains, utility companies, banks and national telecoms providers etc.

4.8 In the event of becoming involved in a dispute with the Association arising out of such a transaction or agreement, you must immediately notify the Chair and/or Chief Executive and withdraw from any discussions relating to the service involved.

4.9 In the case of ~~ELHA Board Management Committee~~ members, if the dispute cannot be resolved through the normal complaints procedure and you remain dissatisfied, you should resign from the ~~ELHA Board Management Committee~~ in order to pursue the complaint independently.

5.0 Granting a Tenancy

~~5.1 Being one of our people or being closely connected to one of our people should not prevent someone being allocated a tenancy if they are in housing need and the terms of our allocations policy are met. To ensure transparency and probity, consideration of the application / allocation should be carried out completely independently of the individual; their connection to the RSL must be explicitly identified and the allocation and should be approved by a senior officer in accordance with our Scheme of Delegated Authority. The allocation should be registered within FIVE days of being made and reported to the next meeting of the ELHA Board, along with confirmation that the necessary management processes were followed.~~

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~~5.2 This is outlined within the entitlements, payments and benefits table at section 6 of this policy (see 6.12).~~

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~~5.1 Our Rules require the Management Committee to set our policy on payments and benefits and keep it under review. This policy has been approved by our Management Committee and is based on the Model published by the SFHA. It is consistent with the requirements of our Codes of Conduct for Management Committee Members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements. Legal advice was taken from our solicitors, Anderson Strathern, in preparing this Policy, to ensure we meet the required Regulatory Standards.~~

~~5.2 This policy was last reviewed by our Management Committee in August 2022. It will be reviewed not later than August 2027.~~

6. Appendix A – Entitlements, Payments and Benefits

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
HUMAN RESOURCES AND RECRUITMENT		
<p><u>6.1</u> All entitlements arising from your contract of employment with us or R3, 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 / <u>sacrifices</u> 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 • <u>Access to discounts (or similar) for personal use / purchase of goods / services as part of employment terms / benefits.</u> 	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.
<p><u>6.2</u> Payment to an ELHA Board-Management Committee or R3 Board member for their role, in accordance with the terms of their letter of appointment</p>	No	These are not permitted, all roles are voluntary.
<p><u>6.3</u> 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 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.

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
6.4 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 (e.g. a loan to support education or training costs). We cannot make any other loans to individuals.
6.5 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>Or</p> <p>We can make a voluntary severance payment (often referred to as a Settlement Agreement) 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 and is in accordance with the terms of the relevant policy • Payment is approved by the ELHA Board Management Committee • 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
6.6 An offer of employment (temporary or permanent) to someone who is closely connected to a member of staff	Yes	This is permitted as long as:

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<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 the <u>ELHA Board Management Committee</u> and • <u>You record your connection to the successful applicant in the register within five days of their acceptance of the offer.</u> <p>• <u>Since there can be no direct or indirect line management responsibility, someone who is closely connected to the CEO / Director cannot be appointed to any role.</u></p>
<p><u>6.7 The offer of employment (temporary or permanent) or contract for the provision of services (e.g. specialist advice) to someone who is, or has been in the last twelve months, a member of our Management Committee or to anyone who is related to a member of the Management Committee</u></p> <ul style="list-style-type: none"> • <u>A current member of the ELHA Board</u> • <u>Was previously a member of the ELHA Board in the past 12 months</u> • <u>Is closely connected to a current member of our ELHA Board</u> 	<p>No</p>	<p>This cannot be permitted. <u>This is because the governing body is the employer and determines all policies, terms and conditions relating to our employment practices. Consequently, it is very difficult to avoid the risk of a perception that someone closely connected to one of our people may have been unfairly advantaged or that an employee of an ELHA Board member may be able to exert inappropriate influence. Equally, if someone who is, or has recently been a member of the ELHA Board, it is essential to ensure that it is not possible for there to be any risk of a perception that they have received favourable treatment and / or had access to privileged information about a post that they are subsequently recruited to.</u></p>
<p><u>6.8 Appointment of one of our staff members to the ELHA Board Management Committee</u></p>	<p>No</p>	<p>This cannot be permitted in accordance with the Rules of the organisation.</p>
<p><u>6.9 Nomination, election or co-option to the ELHA Board of someone who was, in the last twelve months, a member of staff</u></p>	<p>No</p>	<p>This cannot be permitted. This is because the governing body is the employer and determines all policies, terms and conditions relating to our employment practices. Consequently, it is very difficult to avoid the risk of</p>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<u>a perception that someone who has recently been an employee may be able to exert inappropriate influence.</u>
6.10 Nominations to join the <u>ELHA Board Management Committee</u> from people who are connected to a serving member.	No	This cannot be permitted in accordance with the Rules of the organisation.
6.11 <u>Nomination to join the ELHA Board from someone who is closely connected to an employee.</u>	<u>No.</u>	<p><u>This cannot be permitted. This is because the governing body is the employer and determines all policies, terms and conditions relating to our employment practices. Consequently, it is very difficult to avoid the risk of a perception that someone who has recently been an employee may be able to exert inappropriate influence.</u></p> <p><u>Nomination application forms should require potential ELHA Board members to identify anyone they are closely connected to: if a nominee is closely connected to a current employee, Rule 40.3.2 permits the ELHA Board to reject the nomination.</u></p>
OUR PEOPLE AS TENANTS OR SERVICE USERS		
6.12 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 <u>and our procedures for determining an allocation involving one of our people or someone closely connected to them</u> 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 Management Committee in advance and • The tenancy is recorded as an interest in the appropriate register within five days of the tenancy commencing <u>and reported to the ELHA Board at its next meeting</u>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<p>6.13 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><u>Where one of our people is a tenant who is eligible to received 'in-kind' support (e.g fuel voucher, energy saving appliance) that is available to all tenants, this does not need to be individually registered / recorded as the tenancy has already been declared and registered</u></p>	<p>Yes</p>	<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 the Director of Housing. 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>
<p>6.14 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>Payment of decoration allowances or incentive/reward payments must be made in accordance with our policies and procedures and recorded in the 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>
<p>TRAINING AND EVENTS</p>		
<p>6.15 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>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<p><u>6.16</u> 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>
<p><u>6.17</u> Attendance by you at events to mark awards, achievements or other significant milestones relevant to our business <u>and that do not form part of a sector conference e.g. SFHA Annual Conference.</u></p>	<p>Yes (where total cost does not exceed £500)</p>	<p>The ELHA BoardManagement Committee must approve attendance in advance, 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> <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 ELHA BoardManagement Committee would be required.</p>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
GIFTS AND HOSPITALITY		
<p><u>6.18</u> Gifts received from tenants and external sources</p>	<p>Yes (not exceeding a value of £7025)</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 cumulative value of gifts received from the same source in a 12 month period does not exceed £7000 you do not receive more than threetwo such gifts from the same source in a 12 month period you record receipt of the gift(s) in the register <p>You should not normally accept other gifts and should decline any gifts with a value of more than £760 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 three timestwice from the same source within a 12 month period. The total cumulative value of gifts received from the same source over the course of a year must never exceed £760.</p> <p>You should also record any offers that you decline and the reasons for this, in the register within five days.</p>
<p><u>6.19</u> 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 £1200)</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), Retirement Leaving the organisation

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
		<p>These must be recorded in the relevant register and the value of such gifts will not normally exceed £1200.</p> <p><u>Connected people who are not employees are responsible for ensuring that any tax liability associated with a payment you are entitled to receive is met.</u></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. For staff, contractual terms may be in place that dictate the value of any gift upon retirement / long service.</p>
<p>6.20 Hospitality associated with our business and that of its partners</p>	<p>Yes (when not exceeding a value of £700)</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 £700 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><u>Contributions to seasonal celebrations for staff and ELHA / R3 Board (e.g. Christmas are permitted: it is for individual RSLs to set the terms of such contributions which, of course, must not exceed what is permitted by the model EPB policy (£70 per person). RSLs' policy on gifts and hospitality should cover this.</u></p> <p>You should not accept invitations with a value that is greater than £700, unless you have prior approval from the ELHA Board 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.</p> <p>In this case, the reason for acceptance must also be included in the register and countersigned by the Chair.</p>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
6.21 Our people seeking donations from our contractors/suppliers when fundraising for charity	Yes	<p>This is permitted provided:</p> <ul style="list-style-type: none"> Approval is gained from the Chief Executive prior to making any approach Any donations received are recorded in the register <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>
PROCURING GOODS/SERVICES		
Sale of a property under Right To Buy to someone affected by this policy	Yes	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.
6.22 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"> 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.
6.23 <u>The organisation entering into a contract with a contractor or service provider where one of our people, or someone connected to them, has significant control and the contract is within the scope of public procurement legislation.</u>	<u>It must be permitted where excluding the contractor / service provider would put the organisation in breach of its obligations under applicable</u>	<p><u>This must be permitted where:</u></p> <ul style="list-style-type: none"> <u>(1) the contract is subject to applicable procurement legislation (including the Public Contracts (S) Regulations 2015 and the procurement Reform (Scotland) Act 2014) ; and</u> <u>(2) that contract has been procured in accordance with that legislation and the contractor / service provider has not been excluded and has been selected as the preferred bidder.</u>

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EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
	<p><u>procurement legislation.</u></p>	<p><u>In particular it will be necessary to ensure that any potential conflict of interest is managed during the procurement process in order to avoid any distortion of competition and ensure equal treatment of contractors. This may be achieved by the following:</u></p> <ul style="list-style-type: none"> <u>• The person connected to the contractor has played no part in the development of the terms of the procurement exercise or the contract prior to it being advertised.</u> <u>• The person connected to the contractor is not involved in any part of the procurement process (including specification of the contract requirements) or decision to award the contract.</u> <p><u>▲ If the above steps are taken, then it is unlikely to be lawful to exclude the contractor. If those steps cannot be complied with then it may be both permitted and necessary to exclude the contractor, but only if there is no other means short of exclusion to remedy the conflict of interest.</u></p> <p><u>The appointment of a connected contractor must be reported to the Governing Body and recorded in the relevant Register(s) along with details of the process followed.</u></p> <p><u>Once the contract has been awarded in accordance with the relevant procurement legislation, the organisation must manage the contract in accordance with the Scottish Housing Regulator's Standards of Governance and Financial Management, particularly Regulatory Standard 5.4: <i>Governing Body members and staff declare and manage openly and appropriately any conflicts of interest and ensure they do not benefit improperly from their position.</i></u></p>
<p><u>6.24</u> The organisation entering into a contract with an <u>organisation contractor or service provider</u> where one of our people, or someone <u>closely</u> connected to them, has</p>	<p><u>Only in specific and limited circumstances</u> <u>No</u></p>	<p><u>This is not permitted in almost all circumstances.</u> We could only consider this where:</p>

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Agenda Item 10
Policy Document

EXAMPLE	CAN THIS BE PERMITTED?	FURTHER ACTION NECESSARY BEFORE THIS WILL BE PERMITTED?
<p>significant control, <u>and the contract is not within the scope of public procurement legislation.</u></p>	<p>(in almost all cases)</p>	<ul style="list-style-type: none"> • There is no reasonable alternative (e.g. because of geography or the specialist nature of the goods / services AND • The person affected by this policy is not involved in any part of the procurement process or decision • The appointment is approved by the <u>ELHA Board Management Committee</u> 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) <p>In such rare circumstances, the appointment must <u>would</u> be recorded in the register along with details of the process followed.</p>
<p><u>6.25</u> 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 <u>closely</u> connected to one of our people</p>	<p>No (in almost all cases)</p>	<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"> • 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
<p><u>6.26</u> The purchase of goods / services from our suppliers / contractors by one of our people</p>	<p>Yes – <u>if no other reasonable alternative exists</u></p>	<p>This should normally be avoided, and will only be potentially permitted if the procedure identified in Section 4 (and set out in more detail in our <u>"Use of Association Contractors / Suppliers Declarations" Procedure</u>) is followed</p>

Review

7.1 Our Rules require the ELHA Board to set our policy on payments and benefits and keep it under review. This policy has been approved by our ELHA Board and is based on the Model published by the SFHA. It is consistent with the requirements of our Codes of Conduct for ELHA Board Members and for Staff. These Codes have been confirmed by the Scottish Housing Regulator as meeting their regulatory requirements. Legal advice was taken from our solicitors, Anderson Strathern, in preparing this Policy, to ensure we meet the required Regulatory Standards.

6.2 This policy was last reviewed by ~~our Management Committee~~the ELHA Board in ~~August 2022~~March 2026. It will be reviewed by ELHA Board not later than ~~August~~March 202731.

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Procurement & Value for Money Strategy Review

Report by Gary Alison, Director of Finance & Corporate Services – for approval

1.0 Background

Section 15 of the Procurement Reform (Scotland) Act 2014 requires any public organisation, which has an estimated total value of regulated contract spend of £5 million or more (excluding VAT) in a financial year, to prepare and publish a Procurement & Value for Money Strategy.

A Procurement & Value for Money Strategy was developed in 2023 as ELHA had ambitions to develop new housing stock which meant the estimated value of regulated procurement spend was expected to exceed £5million and required a strategy to be developed.

However, it is uncertain if spend in relation to Section 75, “off the shelf” purchases of new homes, are categorised as regulated procurement spend. What this means was that ELHA spend could fall below the £5m requirement to prepare a Strategy and Annual Procurement Report.

The Scottish Government do however note that if an organisation’s spend is less than £5 million, it is encouraged to prepare and publish a Procurement Strategy. The ELHA Board have previously agreed to retain the Strategy as there was value in doing this to ensure continued procurement improvement for future Continuous Improvement Programme for Procurement (CIPPs) assessments, as part of grant funding conditions for new build homes.

Developing RSLs are required to participate in a procurement improvement programme, CIPPs, every two years. ELHA last undertook this assessment in June 2024. The June 2024 CIPP assessment found that the Association had embraced the need for good procurement and highlighted examples of robust procurement practices across the whole Association during the assessment. The best examples included comprehensive policies and procedures, KPI’s, collaboration and career development.

The CIPP identified four areas for improvement which are fed into the revised Procurement Strategy (see below).

2.0 Procurement & Value for Money Strategy

A review of this Strategy has been undertaken five months early to move the review period cycle to just before the start of the next business planning year, so that actions relating to the Strategy, can be incorporated into the Business Plan.

The revised **Strategy Document** is attached to this report

The revised Strategy has been created from ongoing ambitions from the previous strategy, recommendations from the CIPP and building up a stronger procurement offering, all in line with the overall strategic ambitions.

The key changes to the strategy are noted in the table below:

Section	Changes
1.4 & 1.5	Paragraphs added to note that ELHA Board have made a commitment to complete a Procurement Strategy, when it is possibly not required to do so (if Section 75 development purchases were included in the regulated spend figures)
1.6	Removed the line that this is ELHA first Procurement Strategy
4.9	The word “continuous” has been added into to note improvements around contract management has been made but is a continuous process
5.4	A new paragraph added in to reflect a recommendation from the CIPP around having a contracts risk register
5.5	A recommendation from the CIPP was to utilise less consultancy support on regulated procurement – a line has been added to note this will now only be done when necessary, based on the value and risk of the procurement activity being undertaken
5.6	The additions reflect a recommendation from the CIPP around consideration of whole life cycle costings as part of any procurement exercise
9.2	Additional narrative added in around the nine protected characteristics
Section 8	Updated narrative to reflect achievements of previous Strategy where all staff been trained to the level required for their role
Appendix 1	Updated to reflect current position with procurement as a result of the current Strategy and recommendations from the CIPP for improvement Expected outcomes from undertaking the CIPP improvements have been added
Appendix 2	Updated Action Plan for 2026/27

	Progress against the actions from the action plan are covered in the Annual Procurement Report, reported to Board in August each year
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There are also a number of tracked changes to make the document easier to read.

The ability to take actions in relation to the Action Plan supporting the Strategy is contingent on regulated procurement being undertaken in the business plan year. There is no regulated procurement tenders planned for 2026/27 which inhibits progression of some of the objectives.

3.0 Procurement Policy

Following approval of this Strategy, the Procurement Policy will also be reviewed earlier than its planned August 2026 review date. There are no material changes expected to be made and the policy review framework allows the Senior Management to sign this off (with the ELHA Board notified when this is completed).

4.0 Previous Reports to ELHA Board

Previous reports relevant to this topic are as follows:

Report	Agenda Item	Date
Procurement & Value for Money Strategy Review	12	21 August 2025

Recommendation

The ELHA Board are asked to approve the updated Action Plan for the Procurement & Value for Money Strategy.

GROUP STRATEGY

Date Issued	August 2023
Date Last Reviewed	March 2026
Department	Corporate
Title	Procurement & Value for Money Strategy 2026/29
Objective	To set out the strategic direction for the Group in relation to procurement
Responsible	Director of Finance & Corporate Services
Next Review Date	March 2029

1.0 Purpose

- 1.1. This document articulates the East Lothian Housing Association Group's (The Group includes East Lothian Housing Association and its subsidiary company, R3 Repairs, thereafter referred to as ELHA) strategic focus for its procurement activities.
- 1.2. It provides an overview on how we will meet our aims and objectives to deliver value for money, including how we intend to carry out our regulated procurement activity.
- 1.3. Section 15 of the Procurement Reform (Scotland) Act 2014 requires any public organisation, which has an estimated total value of regulated procurement spend of £5 million or more (excluding VAT) in a financial year, to prepare and publish a procurement strategy. The period the procurement strategy covers can be defined by the organisation e.g. 3 years, 5 years, etc. We have chosen to make this for 3 years.

1.4. It is uncertain if spend in relation to Section 75, "off the shelf" purchases of new homes, are categorised as regulated procurement spend. If it is not included, our spend would be below the £5m requirement to prepare a Strategy and Annual Procurement Report.

4.4.1.5. The Scottish Government do however note that if an organisation's spend is less than £5 million, it is encouraged to prepare and publish a Procurement Strategy. The ELHA Board have agreed to retain the Strategy as there was value in doing this to ensure continued procurement improvement for future Continuous Improvement Programme for Procurement (CIPPs) assessments, as part of grant funding conditions for new build homes. As we have ambitions to develop new housing stock, ELHA's estimated value of regulated procurement spend is expected to

~~exceed £5million or more in the short to medium term. Therefore, there is now a requirement for us to prepare and publish a procurement strategy.~~

~~4.5.1.6.~~ Where an organisation has an existing procurement strategy, there is no requirement for it to prepare a completely new procurement strategy each year. ~~This is ELHA's first documented procurement strategy.~~

~~4.6.1.7.~~ An organisation must, however, review its procurement strategy annually and make such revisions as it considers appropriate for the purposes of the Act. We will adopt this approach.

~~4.7.1.8.~~ An organisation must publish its procurement strategy, including any revisions, online, and by any other appropriate means. ELHA must notify Scottish Ministers of the publication of its procurement strategy by sending an email to ProcurementStrategies@gov.scot attaching the procurement strategy or including a link to where the procurement strategy can be accessed. This strategy will be made available on elha.com.

~~4.8.1.9.~~ Section 15(5) of the Act sets out what an organisation must include as a minimum in its procurement strategy. This includes setting out how the organisation intends to ensure that its regulated procurements will deliver value for money, and how they will be carried out in compliance with the sustainable procurement duty. Sections 2 to 14 of this strategy are real-life sections that have been included in procurement strategies of other organisations and are recommended for use by the Act.

2.0 Executive Summary

2.1. Our vision is to create Healthy Happy Homes, and our Procurement and Value for Money Strategy helps us to achieve that goal.

2.2. This Strategy outlines how we will use procurement to achieve value for money which will support delivery of our vision and strategic ambitions of:

- First class affordable rented homes
- Excellent customer care
- Expert [m](#)Maintenance services
- Support for independent living

2.3. We believe that making the most of every pound of our money we spend is vital to ensure we can maintain affordable rents. That is why we aim where possible to self-deliver goods and services within ELHA. However, we recognise this is not always possible and we will be required to procure goods and services. We believe the aims of this [S](#)strategy will strengthen our procurement capabilities and exceed the aspirations of our customers, whilst at a cost that remains affordable and allows us to achieve our corporate objectives.

3.0 Procurement Vision / Mission Statement

3.1. Our Procurement Vision is:

“Our procurement vision is to self-deliver in the main, by ensuring we deliver a quality service, using quality goods at an affordable cost. Where we cannot self-deliver, we will ensure procurement delivers commercially effective, compliant processes across the Group. We will procure goods, works and services which will ensure excellent customer service and supplier contract management.”

3.2. Our Procurement Mission Statement is:

“To provide strategic direction for procurement across the organisation through knowledge and collaborative working practices with a central focus on delivering enhanced services, continuous improvement and value for money through open, transparent and ethical procurement procedures that deliver sustainable social and environmental benefits to our communities.”

4.0 Strategy Rationale / Context

4.1. The purpose of our Procurement and Value for Money Strategy is to set out the Vision and Strategic Aims which direct and govern our procurement activities.

4.2. Within ELHA, there is a commercially trading subsidiary operating in an area where a significant proportion of the parent’s expenditure is incurred. This area is property repairs, maintenance and major component replacements. The Group always looks to self-deliver in this area. This self-delivery model is a key strategic commitment of ours to ensure first, a high degree of quality and second, ensure costs are within the Group’s control. The relationship is structured so that the subsidiary company can carry out work for ELHA under the Teckal parameters.

4.3. That said, we recognise that we cannot self-deliver in all aspects of our operations. We also recognise the importance of making the most of our third party spend and taking the right decisions to achieve the right outcomes means that that we need a dynamic strategy for ensuring there is a clear framework for achieving a continuous programme of improvement and value.

4.4. This [Ss](#)strategy should enable procurement to contribute to the Group’s overall vision and to provide efficiencies to help the Group deliver its key priorities and front-line services.

4.5. The strategic aims and objectives will be aligned to each financial year and will be reviewed annually to ensure that an efficiency focus is maintained year on year. The results will be reported annually, with the annual procurement report, and new targets set for the coming year.

4.6. The current strategic aims and objectives are set against a backdrop of local and national economic challenges, objectives and pressures.

- 4.7. Affordability of rent is a sector wide issue for Housing Association customers. To enable us to keep our rents affordable, we need to make purchasing decisions that are aimed at delivering high-quality goods/services at a competitive price.
- 4.8. As the Scottish Government pushes towards its Zero Carbon target by 2045, it is recognised that Housing Associations are going to play a key part in this through new build properties and retrofitting of existing properties. It is therefore important that we work with suppliers who are innovative and challenging the status quo to deliver goods / services that are going to meet this requirement. We must also work with suppliers to build capability and expertise in this area in order to maintain competitive pricing. Alongside these actions, we will actively pursue external funding to support this vision.
- 4.9. The Sstrategy also recognises that ELHA staff are on a continuous journey on developing procurement capability. Contract management continues to be an area of continuous improvement for the organisation and linked to effective contract management is an understanding of the goods and services being procured. By improving our understanding of what we are procuring and then reflecting this in our specifications, it will ensure we are meeting the needs of what it is we are intending to purchase.
- 4.10. We will measure elements of the effectiveness of the our Pprocurement Sstrategy via the Continuous Improvement Programme for Procurement (CIPP). Although not a mandatory requirement of the Act, it is strongly recommended that we focus on the appropriate CIPP Assessment Question (the procurement influence question) when developing our strategy. As a developing Housing Association, the Group will be required to undertake the CIPP as a condition of the Housing Association Grant funding.

5.0 Strategic Aims, Objectives & Key Priorities

- 5.1. To support our strategic ambitions, the key strategic aim for our Procurement and Value for Money Strategy is focused on delivering an exceptional customer experience with the outcome of achieving high customer satisfaction and well-maintained homes. The aim is then broken down into the following objectives of:
- Efficiently manage our costs
 - Driving quality service improvements linked to customer experience
 - Socially responsible practices
 - Continuous improvement to achieve best value
- 5.2. This Sstrategy will help us to achieve our business plans aims by:

- First class affordable rented homes - Procuring suppliers that can deliver and maintain quality homes at a price that allows us to make our rents affordable for our tenants
 - Excellent customer care - Procuring goods and services that people want in a way that responds to their needs and exceeds their expectations whilst also ensuring cost and satisfaction are favourable
 - Expert ~~m~~-Maintenance services – Procuring goods and services from contractors that allows us to maintain high quality housing stock
 - Support for independent living – Ensuring we have the supply chain in place that can support our tenants to live safely and independently for longer
- 5.3. To achieve our aim, we have developed four ambitions to help us define progress towards improving our procurement capabilities. An overview of the ambitions is set out in **Appendix 1**. In order to achieve these ambitions, **Appendix 2** contains the Action Plan for the first year of this strategy. The action plan for the subsequent years will be updated annually at the same point the strategy is updated.
- 5.4. **Ambition 1** – All spend that can be positively influenced by procurement activity has a corresponding contract.

By analysing our supplier spend and establishing what contracts we have in place, it will allow us to establish a programme of contract renewals and monitor existing contracts.

We will monitor existing contracts to ensure regular supplier meetings are held with suppliers we are in contract with. As part of this review, we will ensure contract KPI's are being adhered to and where not, work with the supplier to identify why contractual performance is an issue or seek to terminate the contract on non-performance.

By having a central record of all contracts, it will allow us to identify lessons learnt from previous procurement exercises and work towards best practice guidance which can be shared to the wider group.

From our list of contracts, we will create a contracts risk register to identify our high value and high risk of failure contracts to assure ourselves we have mitigation strategies in place should a risk materialise.

Ambition 1 Outcomes

- Higher contractor performance
- Tendering process carried out in a timely manner – this allows sufficient time for any customer consultation and participation in the process
- Deliver savings that can be passed onto tenants through lower rent

- Ensuring goods and services are delivered to customers at competitive prices
- Ongoing proportional contract management ensures the right outcomes are delivered and the performance of contracts is maximised

- 5.5. **Ambition 2** – All procurement activity complies with statutory and regulatory requirements and is supported by a detailed technical specification of our purchasing requirements.

Ensuring we are compliant with statutory and regulatory guidance ensures we are in line with the principles of public procurement: transparency, equality, proportionality and mutual recognition.

We will continue to operate with our self-delivery model. Where required to publicly tender, we will look to utilise local / national frameworks or use the expertise of a procurement specialist, where it is felt necessary, based on the value and risk of the procurement activity being undertaken.

A detailed technical specification of goods / services to be procured allows the supply chain to understand our requirements to ensure the purchasing objectives are achieved.

Ambition 2 Outcomes

- All suppliers ~~utilised~~ we use will be of high quality and deliver exceptional customer service
- We will purchase exactly what we intend to purchase to meet our customer needs, and the supplier will fully understand our requirements

- 5.6. **Ambition 3** - All relevant contracts are arranged to include sustainable procurement requirements.

Sustainable public procurement aims to make the best use of public money.

Every time we make a regulated procurement we will:

- Ensure contracts can be structured in such a way as to assist wherever practical, local suppliers, micro, small and medium enterprises and the third sector to tender for our business
- Promote innovation by considering working in partnership with the supply chain to develop an innovative offering
- Promote early supplier engagement to foster innovative and entrepreneurial responses to our needs and requirements

- Ensure life cycle costings are factored into purchasing decisions (we will improve purchasing within the organisation that promotes economies of scales such as standard component replacement parts for all properties. The price quality assessment of tenders will be adjusted to reflect this)
- Encourage a sustainable supply base that can support the work of the organisation to provide resilient and robust supply chains

Ambition 3 Outcomes

- Growth in local communities through employment
- Enhanced use of technology to maximise value for money
- Ability to respond to customer needs supported by the latest innovation
- Our purchasing will reflect the best value over the lifecycle of the goods/works/services being procured.

- 5.7. **Ambition 4** – All staff trained to be able to carry out a procurement activity commensurate with their role within the Group and authority level.

Through continuous learning and development all staff will feel competent in delivering procurement activity.

Ambition 4 Outcomes

- Secure commitment to excellent procurement from all staff throughout the Association
- 5.8. The Procurement and Value for Money Strategy will be supported by several other strategies including:
- Asset Management Strategy
 - Risk Management Strategy
- 5.9. In line with the requirements of the Act, the following is included in the Procurement Policy that supports this Sstrategy:
- The use of community benefit requirements
 - Consulting and engaging with those affected by its procurements
 - The payment of a Living Wage to persons involved in producing, providing or constructing the subject matter of procurement
 - Promoting compliance by contractors and sub-contractors with the Health & Safety at Work, etc. Act 1974 and any provision made under that Act
 - The procurement of fairly and ethically traded goods and services

6.0 Measuring the Impact

- 6.1. It is important that we understand the impact of the work we undertake. This is necessary to ensure that we know what works; what difference has been made, and how effective [ELHA's our](#) procurement can be.
- 6.2. The following outcomes demonstrate the effective implementation of the Procurement Strategy and can be summarised as follows:
- Contracts - ensuring that all spend that can be positively influenced by procurement activity has a corresponding contract
 - Compliance - ensuring that all procurement activity complies with statutory and regulatory requirements
 - Accessibility - ensuring that contracts can be structured in such a way as to assist wherever practical, local suppliers, micro, small and medium enterprises and the third sector to tender for our business
 - Sustainability - ensuring that all relevant contracts are arranged to include sustainable procurement requirements
- 6.3. The main activities that will be undertaken in 202~~64~~/~~27~~⁵ to achieve these outcomes are included in **Appendix 2**.
- 6.4. The following performance indicators will be used to monitor progress in the outcome for the life span of the strategy and reported annually with the Annual Procurement report:

Performance Indicator Name	Target
Percentage of ELHA expenditure covered by contracts	91%
Number of ELHA collaborative opportunities explored as a percentage of all regulated contracts tendered	100%
Regulated contracted ELHA suppliers paying the living wage	100%

7.0 Spend / Finance

- 7.1. We incur costs in the following key areas:
- Management of the business
 - Repairs and maintenance of our own properties – reactive and cyclical maintenance – some of which will be chargeable, or service charged to customers
 - Major repairs and upgrades to our own properties – i.e. kitchens, bathrooms and also including [aAids](#) & [aAdaptations](#)

- Materials and subcontractors for repairs and maintenance to customers properties
- Development of new properties
- IT equipment
- New innovations

7.2. The key areas of spend are,

- Materials and subcontractors for repairs,
- Major repairs
- ~~and~~ Development of new properties.

7.2.7.3. Our current forward financial projections over the next 5 years contain a potential future spend on property component replacements of £5.58m and a new build Development programme of £18.534m. As we strive to achieve our Strategic Aims set out in Section 5 this will ensure we will minimise cost and maximise value from this spend.

7.3.7.4. In line with the requirements of the Act the following is included in the Procurement Policy that supports this Sstrategy and intends to ensure that, so far as reasonably practicable, the following payments are being made no later than 30 days after the invoice (or similar claim) relating to the payment is presented:

- Payments due by the organisation to contractor(s)
- Payments due by a contractor to a sub-contractor(s)
- Payments due by a sub-contractor to sub-contractor

8.0 Staff Expertise

8.1. Delivering this Sstrategy requires our staff to have a clear understanding of why we procure, how we do this and what performance and improvement looks like.

8.2. In order to ensure this, we have developed a Competency Framework to define what skill level each role in the organisation should have in relation to procurement. This is reflected in all job descriptions.

8.3. Having done this, an ongoing training programme is in place for staff to ensure they have the skills commensurate with their responsibility.

9.0 Equality and Human Rights

- 9.1. We are committed to recognising and celebrating diversity and promoting equal opportunities across all areas of the business. We recognise the dignity and worth of each individual and promote mutual respect between gGroup's based on understanding and valuing diversity, underpinned by a respect for equality and human rights.
- 9.2. We will continue to work towards the widest representation from all sections of the community. We will try and remove all barriers to involvement, supporting communities wherever possible. We will also work in partnership with other organisations to embed good practice.

We will ensure that no one~~Nobody is~~will be treated less favourably than any other person or group because of their age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex or sexual belief.

10.0 Implementation, Monitoring, Reviewing and Reporting

- 10.1. The Sstrategy will be subject to ELHA's-our framework of monitoring and review to ensure progress and flexibility to respond to new and emerging needs.
- 10.2. Monitoring of the strategic objectives and action plan tasks will be in the form of an annual report to the ELHA Board-Audit & Assurance Committee.
- 10.3. The Action Plan that supports the -Sstrategy will be subject to an annual reviewrenewal and development to ensure that new priorities are addressed, and the strategic objectives continue to deliver a value for money for the customer.
- 10.4. Externally, we will publish our Annual Procurement Report in line with the requirements of the Act. There are no deadlines for this, but we will strive to report this as soon as practically possible after the financial year end.
- 10.5. ELHA-We will undertake the Continuous Improvement Programme for Procurement as well as a future Internal Audit in this area to provide external confirmation of compliance with this Sstrategy as well as recommendations for areas of improvement.

11.0 Risk Management

- 11.1. In the delivery of this Sstrategy, we recognise that several risks exist.
- 11.2. As part of ELHA's-our approach to risk management, our policy and procedure supporting this Sstrategy, sets out our approach to ensure compliance with all Health and Safety matters as part of any procurement exercise.

12.0 Strategy Review

- 12.1. The Director of Finance & Corporate Services will ensure that this Strategy is reviewed every year, and any amendments required will be submitted to the ELHA Board Management Committee for approval.

- 12.2. This Strategy complies with all relevant law and best practice and will be reviewed if any changes necessitate an early review.
- 12.3. This Strategy and supporting policy and procedures have also been checked to ensure that opportunities for bribery or corruption in terms of the Bribery Act 2010 have been minimised. Further information on compliance with the Bribery Act 2010 can be found in ELHA's Anti-Bribery and Corruption Policy.

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Appendix 1

Ref	Objective	Where Are We At Now	Start Target	End Target	Outcome
1	All spend that can be positively influenced by procurement activity has a corresponding contract.	<p>Spending money with no contract in place.</p> <p>Subsidiary contract spend analysed</p> <p>Contracts held in various locations across the business.</p> <p>No — Ttendering timetable in place.</p> <p>Key Ad hoc supplier meetings held.</p> <p>No formal and central recording of lessons learnt.</p> <p><u>The function of contract management is not segmented from the contract register based on value and risk</u></p>	<p>Q12 263/274</p>	<p>Q4 285/296</p>	<p>Visibility of who we are spending money with and how much.</p> <p>All contracts held in one place and visible to whole organisation.</p> <p>End dates on contracts identified and a planning process put in place to tender contract.</p> <p>Suppliers identified that don't have a contract in place and where a contract should be in place to be put into the planning process and put out to tender</p> <p>Contract meetings taking place</p> <p>Improvement in supplier performance and customer experience through supplier scrutiny.</p> <p>Reduced customer complaints.</p> <p>Timetable of procurement activities laid out for the next 3 years.</p> <p>Appropriate lead in times into tendering new contracts to allow time for detailed specification to be created and customer consultation.</p> <p><u>Lessons learnt register established.</u></p>

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					<u>Contract risk register maintained based on value and risk with a route established from this into the operational/corporate risk register.</u>
2	All procurement activity complies with statutory and regulatory requirements and is supported by a detailed technical specification of our purchasing requirements.	Some current spends would benefit from a regulated tender. Improved supplier specifications.	Q21 263 /274	Q4 285 /296	All business expenditure procured in line with the statutory and regulatory requirements. Risk of incorrectly procuring reduced. Clear and concise technical specifications that meet customer (both external and internal) expectations and allow the supply chain to accurately price for work.
3	All relevant contracts are arranged to include sustainable procurement requirements.	<u>Low level consideration of</u> Not considering sustainable procurement at the outset of any tender. Unable to quantify % of spend spent on local suppliers, micro, small and medium enterprises and the third sector business.	Q12 263 /274	Q4 285 /296	Where VFM can be evidenced, an increase in use of local suppliers, micro, small and medium enterprises and the third sector business. Improvement in quality of service to customers through local supplier knowledge. Quantified % expenditure with local suppliers, micro, small and medium enterprises and the third sector business. Engagement with local supply chain well in advance of tendering requirements.

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		<p><u>Not considering climate related and circular economy KPIs in procurement.</u></p> <p><u>Whole life cost cycles not being considered in every tender</u></p>			<p><u>Climate related performance measures included in tender assessment.</u></p> <p><u>Evidence of life cycle costings considered in price evaluation.</u></p> <p><u>Whole life costings reflected in the split of price/quality assessment on tenders.</u></p>
4	<p>All staff trained to be able to carry out a regulated procurement activity.</p>	<p>Mixed skill set across the organisation in terms of ability to deliver a regulated procurement activity.</p> <p><u>All staff have been trained at level commensurate to their role.</u></p> <p><u>All job descriptions have been updated to include procurement skills requirements at the job role level.</u></p> <p><u>For regulated procurement activities, a</u></p>	<p>Q12 263/274</p>	<p>Q4 285/269</p>	<p>Expectations set in terms of skill level for each role in the organisation.</p> <p>Continual training plan put in place to <u>maintain enhance</u> staff skill set at the level required for job role.</p> <p><u>Some regulated procurement activities are carried out without the support of a consultant. This would be the case for low level, low risk contracts.</u></p>

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		<u>consultant is being used to support this.</u>			
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ELHA Board 26/03/26

Appendix 2

TASK	ASSIGNED TO	PROGRESS	2026						2027						
			April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	
All spend that can be positively influenced by procurement activity has a corresponding contract.															
Full contracts database maintained and monitored on a monthly basis to ensure all spends >£2k per annum and a responsible individual.	DoF&CS														
Full contracts database monitored on a monthly basis to ensure supplier meetings are being held, in line with the contracts management policy, and contract KPI's being monitored.	DoF&CS														
Tendering timetable for 2027/28 and beyond put in place.	DoF&CS														
Improving reporting on supplier %'s paid on time	DoF&CS														
Develop a contracts risk register and evaluated contracts based on value and impact	DoF&CS														
All procurement activity complies with statutory and regulatory requirements and is supported by a detailed technical specification of our purchasing requirements.															
Contine to review contracts to ensure compliance with statutory and regulatory compliance	DoF&CS														

ELHA Board 26/03/26

TASK	ASSIGNED TO	PROGRESS	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar
All relevant contracts are arranged to include sustainable procurement requirements.														
Quantify % expenditure with local suppliers, micro, small and medium enterprises and the third sector business.	DoF&CS													
All staff trained to be able to carry out a regulated procurement activity.														
No actions required in 26/27.														

Landlords Safety Manual Policy Review

Report by Charlie Cooley, Director of R3 & Asset Management – for Approval

1.0 Introduction

The Landlords Facilities Health, Safety and Welfare Management System Control Manual (LSM) was initially developed in 2016, and made available to EVH Members. East Lothian Housing Association adopted this manual in 2025 and is working through it, to make this ELHA specific.

The core function of RSL's is to provide housing and related services. Under modern legislation, a wide range of topic-specific compliance requirements are placed on landlords to ensure premises and services are maintained in a safe and habitable condition. These requirements are generally considered to be more related to facilities management than traditional Health & Safety requirements, although many stem from the same risk management legislation.

To ensure EVH members can demonstrate compliance with their Health, Safety and Welfare responsibilities, as both an employer and a landlord, the LSM has been introduced to deal specifically with facilities and compliance issues that landlords face.

2.0 Topic Specific Policies

Many policies contained within the LSM are based on topic-specific legislation, the complexity of this legislation (and associated approved codes of practice and guidance to fulfil the requirements of BS ISO 45001) often allows for a degree of interpretation and best practise of how best to manage the risks.

The defined policies are intended to cover the basics of legal compliance and good practice. There are 31 topic related policies contained within Section 7 of the manual, most of these policies are Asset Management related topics, with the balance being Housing Management related topics.

These are new policies for ELHA; they have been reviewed and tweaked to be ELHA specific, however remain broadly inline with the EVH model template. EVH issues yearly amendments to the manual, this ensures the manual evolves and is kept up to date with current legislation and best practice.

The introduction of the various policies will be spread across ELHA Board meetings in March, May, August and September 2026.

The following policies have been attached to this report:

12.1 Electrical Safety Policy Document

The aim of this Policy is to ensure the effective inspection, maintenance and management of all electrical installations, fixtures and appliances within premises controlled by East Lothian Housing Association.

12.2 EPC Policy Document

The aim of this policy is to ensure that all relevant properties controlled by East Lothian Housing Association have a valid Energy Performance Certificate (EPC).

12.3 Fire Safety in Housing Stock and Common Areas Policy Document

The aim of this policy is to provide a robust fire safety framework which can be implemented to secure the safety and wellbeing of tenants, visitors and firefighters.

Recommendation

The ELHA Board is asked to approve the following new Policy Documents:

- (a) Electrical Safety Policy;
- (b) EPC Policy; and
- (c) Fire Safety in Housing Stock and Common Areas Policy.

ELHA POLICY

Date Issued	March 2026
Last Reviewed	n/a
Department	Asset Management
Title	Electrical Safety Policy
Objective	To describe the arrangements for managing electrical safety
Responsible	Director of R3 & Asset Management
Next Review Date	March 2031

1.0 Introduction

- 1.1 The aim of this policy is to ensure the effective inspection, maintenance and management of all electrical installations, fixtures and appliances within premises controlled by East Lothian Housing Association.
- 1.2 All electrical repair work and Electrical Installation Condition Reports will be sub-contracted to an external competent body.
- 1.3 The procedures detailed within this section are intended to facilitate the effective management of electrical safety, ensuring that all reasonable steps are taken to comply with the Consumer Protection Act 1987 and the Electrical Equipment (Safety) Regulations 1994.

2.0 Definitions

- 2.1 **Competent Person** – a person suitably trained and qualified by knowledge and practical experience, and provided with the necessary instructions, to enable the required task(s) to be carried out correctly.

3.0 Legal & Regulatory Framework

- 3.1 We will comply with all relevant legislation and regulations including the following (the list is not exhaustive):
 - British Standard BS7671:2018+A2:2022
 - Electricity at Work Regulations 1989
 - Building Regulations Part P (2010)

- The Consumer Protection Act 1987
- The Electrical Equipment (Safety) Regulations 1994

3.2 This policy also takes account of the following policies and procedures:

- Maintenance Legal Obligations Policy
- Empty Homes Policy
- Mutual Exchange Policy
- Chargeable Repairs Policy
- Mutual Repairs Policy
- Complaints Policy and Procedure
- Health & Safety at Work Policy

4.0 Objectives of Electrical Safety

4.1 We will ensure that :

- All electrical installations, fixtures, fittings, and any electrical equipment provided, is safe, in a reasonable state of repair and in proper working order at the start of the tenancy and throughout its duration
- Visual inspections on all electrical appliances are carried out by a competent person before a tenant moves in, and regularly throughout the tenancy
- Service contractors carrying out Electrical Installation Condition Reports (EICR) are competent within the terms of the Regulations and are members of recognised professional bodies
- An EICR will be carried out every five years and at the start of a new tenancy if there have been new electrical installations fitted, or defects identified
- We retain a copy of the Electrical Installation Condition Report for six years (a copy of the most recent report will be issued to the tenant before a tenancy starts; if an inspection is carried out during a tenancy, a copy relating to that inspection will also be given to the tenant)

5.0 Repairs and Emergencies

- 5.1 If we observe any faulty equipment we will ask the tenant to take the item out of service until it is repaired or replaced.
- 5.2 We will use a competent service contractor to carry out repairs and emergency responses.

6.0 Periodic Inspection and Testing

- 6.1 All electrical repair work and Electrical Installation Condition Reports will be carried out by a competent contractor.
- All contractors must be qualified, competent, and hold appropriate insurance and accreditations
 - Work must be carried out to current regulations (BS 7671)
 - We will regularly monitor contractors through audits and performance reviews
 - Contractors must carry out remedial works within 21 days and must issue the Association with a Minor Electrical Installation Work Certificate and for major installations an Electrical Installation Certificate (EIC)

7.0 Void Properties and Lettings

- 7.1 We will carry out an EICR at the start of every new tenancy.

8.0 Tenant Responsibilities

- 8.1 We will:
- Provide tenants with information on electrical safety
 - Ask tenants to report any electrical faults immediately
 - Inform tenants of any electrical items which are prohibited within our premises
 - Provide tenants with advice on the safe usage and storage of electric bikes and scooters. This will include guidance on the following topics:
 - Safe purchasing of electric bikes, scooters, batteries and chargers, including ensuring they are purchased from reputable suppliers and should meet relevant British or European safety standards

- Registering purchased products with the manufacturer so that they can be contacted if any products are recalled or safety information is published
- Safe storage of electric scooters or bikes such as ensuring they are not stored or left to charge in escape routes or in communal areas and that e-bikes, e-scooters, and any batteries for them should be stored in a cool place and in line with manufacturer's instructions
- Keeping and charging e-bikes, e-scooters and batteries away from combustible or flammable materials
- Safe charging practices include:
 - Unplugging chargers when charging is finished
 - Not charging while users are asleep or away from their home in case a fire breaks out
 - Ensuring there are working smoke or heat alarms in the charging area, as per guidance produced by the Scottish Fire and Rescue Service
 - Using manufacturer's approved chargers that are in good condition
 - Ensuring items are not covered when charging
 - Ensuring only appropriate, uncoiled and appropriately rated extension leads are used for charging and that they are not overloaded
- Actions to take if a fire caused by an e-bike or e-scooter breaks out:
 - Checking batteries regularly for signs of damage
 - Safe disposal methods for batteries

9.0 Monitoring and Review

- 9.1 The Asset Manager will submit reports on the performance of the Electrical Safety to the Health & Safety Committee. The reports will include performance against set targets or standards, progress on compliance safety inspections and expenditure compared with budget.
- 9.2 The Director of R3 & Asset Management is responsible for ensuring that all staff involved comply with this policy and the supporting procedures.

10.0 Policy Review

- 10.1 The Director of R3 & Asset Management will review this policy every five years or sooner if required by changes in legislation or organisational practice. Any minor changes will be approved by the Senior Management Team, whereas material changes will be submitted to the ELHA Board for approval.

ELHA POLICY

Date Issued	March 2026
Last Reviewed	n/a
Department	Asset Management
Title	Energy Performance Certificate (EPC)
Objective	To describe the arrangements for ensuring all properties have a valid EPC
Responsible	Director of R3 & Asset Management
Next Review Date	March 2031

1.0 Introduction

- 1.1 The aim of this policy is to ensure that all relevant properties controlled by East Lothian Housing Association have a valid Energy Performance Certificate (EPC).
- 1.2 The procedures detailed within this policy have been written to ensure all reasonable steps have been taken to comply with the Energy Act 2011, The Energy Performance of Buildings (Scotland) Regulations 2008 and all other relevant legislation.

2.0 Legal and Regulatory Framework

- 2.1 We will comply with all relevant legislation and regulations including the following (the list is not exhaustive):

- Energy Act 2011
- Energy Efficiency Directive 2012
- The Energy Performance of Buildings (Scotland) Regulations 2008

- 2.2 The Energy Efficiency Standard for Social Housing (ESSH)

The ESSH requires that:

“All social housing meets, or can be treated as meeting, EPC Band B (Energy Efficiency rating), or is as energy efficient as practically possible, by the end of December 2032 and within the limits of cost, technology and necessary consent.”

In addition, no social housing below Energy Performance Certificate Band D should be re-let from December 2025, subject to temporary specified exemptions outlined by the Scottish Government.

3.0 Energy Performance Certificate (EPC)

3.1 An EPC is a document which states the energy efficiency of a building based on the standardised way the building is used, and provides recommendations on how the efficiency could be improved. An EPC is needed when a property is:

- Built
- Sold
- Rented

3.2 An EPC can be defined as:

‘A legally required document that provides energy efficiency and environmental impact of the property’.

4.0 Period Inspection and Testing

4.1 All EPCs are valid for 10 years.

4.2 We are required to provide a new EPC when a new tenancy starts or after the 10-year period.

4.3 EPCs may be updated if significant alterations have been made to a property after the EPC was issued.

5.0 Routine Maintenance

5.1 We will:

- Arrange for an EPC to be prepared by an approved EPC Assessor where a property is to be sold or let
- Provide the EPC free of charge to a prospective tenant or buyer
- Ensure that the EPC is clearly visible to visitors where the property is used as a public building

- consider the recommendations of each EPC and determine whether improvements could/should be made to improve the energy efficiency performance of the premises

6.0 Monitoring and Review

6.1 The Asset Manager will submit reports on the performance of the Energy Efficiency to the Health & Safety Committee. The reports will include performance against set targets or standards, progress on compliance safety inspections and expenditure compared with budget.

6.2 Director of R3 & Asset Management is responsible for ensuring that all staff involved comply with this policy and the supporting procedures.

7.0 Policy Review

7.1 The Director of R3 & Asset Management will review this policy every five years or sooner if required by changes in legislation or organisational practice. Any minor changes will be approved by the Senior Management Team, but any material changes will be submitted to the ELHA Board for approval.

Date Issued	26 March 2026
Last Reviewed	n/a
Department	Asset Management
Title	Fire Safety in Housing Stock and Common Areas
Objective	To provide a robust fire safety framework
Responsible	Director of R3 & Asset Management
Next Review Date	March 2031

1.0 Introduction

- 1.1 We have in place a robust fire safety framework which can be implemented in the event of a fire, to secure the safety and wellbeing of tenants, visitors and firefighters.
- 1.2 The procedures detailed within this policy are intended to facilitate the effective management of fire safety, ensuring that all reasonable steps are taken to comply with the Fire (Scotland) Act 2005, the Fire Safety (Scotland) Regulations 2006 and all other relevant legislation.

2.0 Legal and Regulatory Framework

- 2.1 We will comply with all relevant legislation and regulations including the following (the list is not exhaustive):
 - BS 5839-6:2019+A1:2020
 - Building (Scotland) Regulations 2004
 - Domestic Technical Handbook (as revised)
 - Electrical Equipment (Safety) Regulations 1994
 - Fire (Scotland) Act 2005
 - Fire Safety (Scotland) Regulations 2006
 - Furniture and Furnishings (Fire) (Safety) Regulations 1988
 - Gas Safety (Installation and Use) Regulations 1998
 - Health and Safety (Safety Signs and Signals) Regulations 1996
 - Health and Safety at Work etc. Act 1974

- Scottish Government Practical Fire Safety Guidance for Existing High-Rise Domestic Buildings

2.2 This policy also takes account of the following policies and procedures:

- Maintenance Policy
- Empty Homes Policy
- Mutual Exchange Policy
- Chargeable Repairs Policy
- Mutual Repairs Policy
- Complaints Policy and Procedure
- Tenant Participation Strategy
- Communication Strategy
- Customer Care Policy and Procedure
- Health & Safety at Work Policy

3.0 Objectives of Fire Safety

3.1 The objective of this policy is to prevent fires starting, ensure safe and rapid escape routes for all tenants, contractors and staff, enable early detection and suppression of fires and limit damage to property.

4.0 Definitions

4.1 **Common Area** – A common area is a portion of a property that is shared and used by multiple residents. This includes areas such as the entrance area, stairway and hallway.

Compartmentation – subdivision of a building by fire-resisting walls and/or floors for the purpose of limiting fire spread within the building.

Competent Person – a person, suitably trained and qualified by knowledge and practical experience, and provided with the necessary instructions, to enable the required task(s) to be carried out correctly.

Dwelling – a house, flat, or other place of residence.

Emergency Lighting – lighting provided for use when the supply to normal lighting fails.

Fire Door – a door or shutter provided for the passage of people, air or objects which, together with its frame and furniture as installed in a building, is intended (when closed) to resist the passage of fire and/or gaseous products of combustion, and is capable of meeting specified performance criteria to those ends.

Smoke Alarm – device containing, within one housing, all the components, necessary for detecting smoke and for giving an audible alarm.

Sprinkler System – a system comprising thermosensitive devices designed to react at a pre-determined temperature to automatically release a stream of water and distribute it in a specified pattern and quantity over a designated area.

HMO – a house, premises or a group of premises with shared amenities, occupied by three or more persons from three or more families as their only or main residence.

5.0 Periodic Inspection and Testing

5.1 Fire and Smoke alarms

We will provide:

- one functioning smoke alarm in the room which is frequently used by the occupants for general daytime living purposes
- one functioning smoke alarm in every circulation space, such as hallways and landings
- one heat alarm in every kitchen

5.2 All alarms will be interlinked, either mains powered or using sealed battery alarms, and provided with an integral stand-by power supply (a minimum of class D).

5.3 We will ensure that fire and smoke alarms are in proper working order at the start of each tenancy, and have a cyclical programme to replace these prior to the expiry date. Alarms have a 10 year lifespan.

5.4 We will ensure that all smoke alarms are installed in accordance with the recommendations contained in BS EN14604:2005 and heat alarms comply with BS 5446-2:2003.

5.5 We will advise tenants to test alarms on a weekly basis, and report any repairs required to us immediately.

5.6 Sharing Owners are responsible for ensuring compliance with the Standard set out at Section 5.4 above.

NB: The Nest Protect System will not be sufficient to comply with the relevant standards and, as such, will not be used.

Carbon Monoxide Alarms

- 5.7 Carbon monoxide alarms will be installed in any room containing a fossil fuel burning appliance. They will comply with British Kitemark EN 50291-1:2018.

Emergency Lighting

- 5.8 Emergency lighting will be present in all communal areas and common escape routes in our blocks of flats. Where the emergency lighting provision is under the control of a third party (e.g. East Lothian Council), we will take all reasonable steps to communicate with the third party in an attempt to ensure compliance with the following.

- The emergency lighting system will be designed to automatically illuminate upon the failure of the power supply
- We will test the emergency lighting monthly and maintain a record of the testing for 3 years
- A competent person will perform an annual discharge test, this will involve simulating a power failure and conducting a test of the full rated duration of the emergency lights (e.g. 3 hours)

- 5.9 We advise tenants to report any faults or failures to us promptly.

Fire Doors and Compartmentation

- 5.10 Buildings containing flats and maisonettes will be split into fire-resisting compartments by fire-resisting doors, walls and floors which will provide a physical barrier to fire.
- 5.11 Doors connecting shared parts of a multi-occupancy dwelling, such as the doors to individual flats or apartments will be rated fire doors.
- 5.12 For homes with an integral garage, the door that joins the garage to the main part of the house will be a fire door.
- 5.13 Doors used for plant rooms and service penetrations such as rubbish chutes will be fire rated.

Emergency Exit Doors

- 5.14 We will ensure all doors which are to be used in an emergency can be opened from the inside without the use of a key and be clearly marked.

Smoke Ventilation

- 5.15 Communal areas will have adequate smoke ventilation either through natural means or by mechanical ventilation.

- 5.16 Any ventilation ducts supplying or removing air from a protected stairway or entrance hall will not serve any other areas.
- 5.17 All buildings will have adequate means for venting heat and smoke from a fire in the basement.

Fire Equipment

- 5.18 We will install sprinklers where we are unable to reduce particular risks by other means.
- 5.19 We will not install fire extinguishers in dwellings as tenants will not be trained on the safe use of extinguishers. Accidents can occur if tenants try to use them in the event of a fire or if they are discharged through malice or horseplay.
- 5.20 To assist the Fire and Rescue Service:
- Dry risers will be installed in any building that is over 18 metres in height
 - Wet risers will be installed in buildings over 50 metres in height
 - Outlets will be present on each floor and located in a fire escape staircase or similar protected location
- 5.21 We will visually inspect both dry and wet risers every 6 months and record the inspection.
- 5.22 A competent person will pressure test both dry and wet risers every year and record the test.

6.0 Evacuation Procedures

- 6.1 Fire evacuation procedures and fire assembly points will be clearly contained within the My New Home Process will be issued to all tenants at the start of a tenancy.
- 6.2 Alternative methods will be available for tenants with language or learning difficulties.

7.0 Signage

- 7.1 We will place fire action signs in corridors (on every level), entrance doors and common areas (where fire safety signs are provided, they will be in accordance with BS 5499 and the Health and Safety (Safety Signs and Signals) Regulations 1996).

8.0 Maintenance and Repairs

8.1 We will:

- Ensure premises, equipment and devices provided for fire safety are subject to a suitable system of maintenance, are maintained in an efficient state, in efficient working order and in good repair
- Carry out all repairs within the timescales set out in our Maintenance Policy and completed by a competent person
- Maintain clear records of the processes in place and actions carried out

9.0 Access and Facilities for the Fire Service

9.1 We will ensure:

- there is sufficient means of external access to enable fire appliances to be brought near to the building for effective use
- there is sufficient means of access into, and within, the building for firefighting personnel to effect search and rescue and fight fire; and that
- the building is provided with sufficient internal fire mains and other facilities to assist firefighters in their tasks

10.0 Fire Risk Assessment

10.1 The legal requirements relating to Fire Risk Assessing are complex and are often taken to exclude domestic premises. However, we have a legal duty to risk assess all areas defined as 'workplaces', which will include plant rooms and other non-tenant-accessible areas. Furthermore, the fire regulations require common areas to be maintained in a certain condition suitable for the fire authority, which can often only be ensured by carrying out a risk assessment.

We will devise a Fire Risk Assessment Strategy and arrange for the undertaking of fire risk assessments (and regular reviews) by competent consultants in accordance with the Strategy.

The following will be considered in developing the Fire Risk Assessment Strategy:

- Fire Risk Assessments will be carried out by a competent, qualified Fire Risk Assessor
- 'Workplaces' such as plant rooms come within the scope of the regulations so far as fire risk assessing is required

- Common areas of domestic premises require to be maintained in a certain condition and may benefit from a 'representative' risk assessing programme
- Particular risks may be posed by external wall systems (recognising that specialised intrusive inspection and fire performance testing may be required in some circumstances)

11.0 Tenant Responsibilities and Communication

11.1 We will include fire safety obligations within elha.com and will issue regular fire safety information packs, we are working to develop printable web pages to remind tenants to:

- Test smoke alarms on a weekly basis
- Ensure all communal areas are not obstructed
- Ensure fire doors are not propped open or otherwise disabled
- Tenants to report any faults or failures promptly

11.2 Tenants will be provided with information on the fire detection system and evacuation procedures / assembly points

11.3 Front doors cannot be changed without our express permission; an alteration request is required to be submitted for this to be considered

11.4 Communication methods will take account of tenants with language or learning difficulties (e.g. braille, audio, different language, etc.)

12.0 Licensed Houses of Multiple Occupancy (HMOs) and workshop premises

12.1 All requirements listed above will be applied. In addition to this, all licensed HMOs and workshop premises managed by the ELHA:

- Will be fire risk assessed by a competent assessor, with periodicity determined by the fire risk assessment
- Will have doors opening in the direction of escape
- Will be supplied with appropriate, maintained extinguishers
- Will have the fire evacuation procedure details relayed to relevant persons.

- Within workshop premises not managed by ELHA, the responsibility for the completion of the fire risk assessment will fall upon the tenant (a copy of the completed fire risk assessment will be held by both the tenant and ELHA)

13.0 Documentation and Reporting

13.1 We maintain accurate records of all servicing reports and Fire Risk Assessments of communal areas.

13.2 The Asset Manager will submit reports on the performance of Fire Safety to the Health & Safety Committee. The reports will include performance against set targets or standards, progress on compliance safety inspections and expenditure compared with budget.

14.0 Monitoring and Review

14.1 Director of R3 & Asset Management is responsible for ensuring that all staff involved comply with this policy and the supporting procedures.

15.0 Policy Review

15.1 The Director of R3 & Asset Management will review this policy every five years or sooner if required by changes in legislation or organisational practise. Any minor changes will be approved by the Senior Management Team, whilst any material changes will be submitted to the ELHA Board for approval.