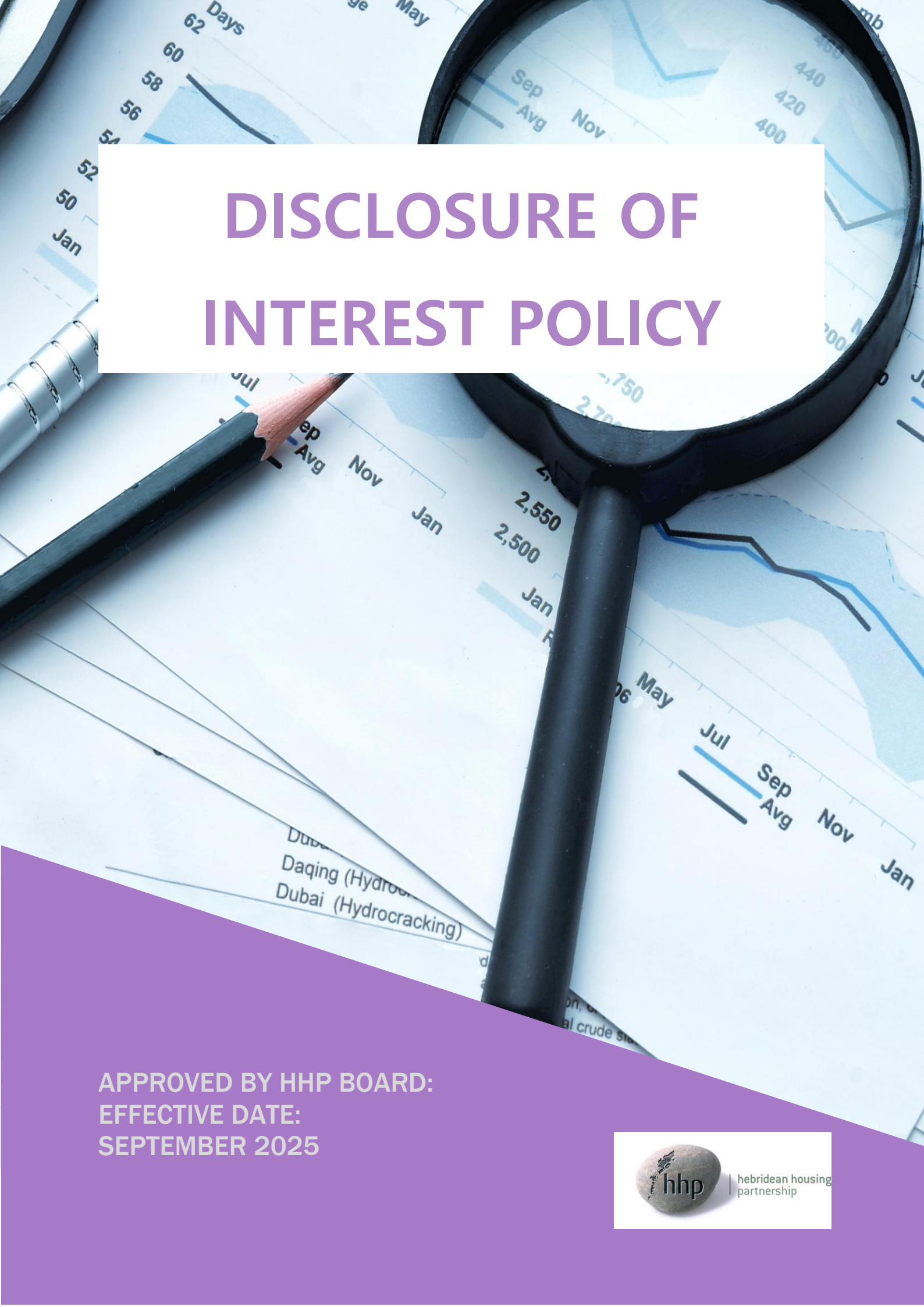




DISCLOSURE OF INTEREST POLICY

APPROVED BY HHP BOARD:
EFFECTIVE DATE:
SEPTEMBER 2025



hebridean housing
partnership

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INTRODUCTION

- 1.1 This policy clarifies the position in respect of personal interest and declaration of interest.
- 1.2 This policy is applicable to our Board Members and staff, and those persons who may be considered to have 'close connection' to either. Close connection is defined at Appendix 1.

AIMS

- 2.1 To ensure that any actual, perceived or potential conflicts of interest, whether financial or non-financial and whether arising from external activities, personal relationships or roles within HHP, are identified and properly managed in compliance with the relevant professional, legal, ethical and regulatory standards on conflicts of interest so that the activity can be carried out without risk to the integrity or reputation of HHP or its staff and Board Members.
- 2.2 To ensure that any interests declared are recorded and there is a transparent and accurate record of the external interests of staff and Board members.
- 2.3 To ensure high standards of conduct and probity, openness and transparency which are underpinned by the Scottish Housing Regulator's Guidance Note 5 Regulatory Standards of Governance and Financial Management which states in its Standard 5:
 - "5.1 The RSL conducts its affairs with honesty and integrity and, through the actions of the governing body and staff, upholds the good reputation of the RSL and the sector." And
 - "5.4 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."

BACKGROUND

- 3.1 Board Members and Staff should:
 - a) recognise that the overriding duty in their remit as a Board Member, or a member of Staff, is to the Partnership;
 - b) do nothing as a Board Member or member of Staff that could not be justified to the Board, to the tenants and sharing owners, to the membership or to the public; and

- c) remember that it is not enough to avoid actual impropriety and at all times avoid situations which could give rise to suspicion or the appearance of improper conduct.

3.2 A Board Member must declare to the Chairperson at meetings any financial or non-financial interests that may be considered to bring about a conflict with the Partnership's interests. Examples of interests that must be declared are highlighted below:

- a) Tenancy of a property (by the disclosee or someone to whom the disclosee is closely connected) of which we are the landlord;
- b) Occupancy or ownership of a property (by the disclosee or someone to whom the disclosee is closely connected) which is factored or receives property related services from us;
- c) Receipt of care or support services from us;
- d) Membership of a community or other voluntary organisation that is active in the area(s) we serve;
- e) Voluntary work with another RSL or with an organisation that does, or is likely to do, business with us;
- f) Membership of the governing body of another RSL;
- g) Being an elected member of any local authority where we are active;
- h) If the disclosee purchase goods or services from us;
- i) If the disclosee purchases goods or services from one of our approved contractors or Framework Agreement partners (please refer to the Entitlements, Payments & Benefits Policy and Procedure for further information);
- j) Significant shareholding in a company that we do business with;
- k) Membership of a political, campaigning or other body whose interests and/or activities may affect our work or activities;
- l) Ownership of land or property in our areas of operation excluding for the purpose of the disclosee's own residential use (i.e. there is no requirement for to declare any house in which the disclosee currently lives);

- m) 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;
 - n) any direct involvement with a business which trades for profit;
 - o) involvement with any organisation from which we may secure a loan
e.g. Banks and building societies (apart from where the involvement is as a customer e.g. a Board Member has a mortgage or account with the bank);
 - p) involvement with or between Board Members, staff and their close relatives;
 - q) sale of a property owned by us to a Board Member or staff member, or to a close relative of a Board or staff member; and
 - r) sale of a property owned by a Board Member or staff member, or by a close relative of a Board or staff member to us.
- 3.3 The above list is not exhaustive and all interests, whether potential or actual should be raised.
- 3.4 If a Board Member has any business interest relating to the work of the Partnership, its activities, values, aims or objectives, which directly or indirectly gives the Member personal advantage, the Board Member should resign his position. If a Board Member considers that another Board Member has such an interest, he has a duty to raise it with the Chairperson.
- 3.5 Board Members must disclose any pecuniary interest in any contract entered into by the Partnership. Any such interest, if not disclosed, will be considered a breach of the Code of Conduct for Board Members and may be grounds for dismissal. See para 1.5 of the Code.

REGISTER OF INTERESTS AND MAKING DISCLOSURES

- 4.1 The Partnership will maintain Registers of Interests of Staff and Board Members, which disclose the following:
- a) name;
 - b) date disclosure was made;
 - c) source;
 - d) item number on agenda (if at meeting); and

- e) what the disclosure is and reason for disclosing.

An example of the Register of Interests may be found at Appendix 2.

4.2 Board Members will be asked to register their interests prior to their first Board Meeting. Thereafter, at the end of each financial year they will be required to fill in a fresh Disclosure of Interest form so the Board Disclosure of Interest Register may be updated. An example of our Disclosure of Interest form may be found at Appendix 3, and it requests the following information:

- a) name;
- b) address;
- c) tenant;
- d) year of birth;
- e) designation (staff);
- f) employment (Board Members);
- g) positions of public responsibility;
- h) membership of other Housing Associations or Co-operatives;
- i) any financial interests relating to the work of the Partnership;
- j) any direct involvement with a business which trades for profit;
- k) involvement with any organisation from which the Partnership may secure a loan e.g. banks and building societies (apart from where the involvement is as a customer's e.g. a Board Member has a mortgage or account with the bank);
- l) involvement with or employment by any organisation which may seek services from the Partnership;
- m) any voluntary or charity work carried out for another organisation with a base in the Outer Hebrides;
- n) relationships with or between Board Members, staff and their close relatives;
- o) any other interests which could impact on their membership of our Board; and

- p) Statement of understanding the EPB Policy.
- 4.3 Members of Staff will be required to complete a Disclosure of Interest form when they are initially employed by us, and details will be recorded in the Staff Disclosure of Interest Register. Thereafter, Staff will be required to complete a Disclosure of Interest Update form annually after the end of the financial year. If there are new disclosures to be made that have not previously been recorded in the Staff Disclosure of Interest Register, then the Line Manager should complete a Request for Approval Form, an example of which may be found at Appendix 4, and refer to the Entitlements, Payments and Benefits Procedure for further guidance.
- 4.4 Staff and Board Members should take reasonable steps to ensure that they or anyone who normally lives as part of their household, (whether they are related to them or not, including spouses / partners who work away from home and sons and daughters who are studying away from home), conform with the requirements of the Entitlements, Payments & Benefits Policy when they wish to use one of our contractors or suppliers (see Contractor List, Appendix B of the Entitlements, Payments and Benefits Policy), and complete the Use of Contractor / Supplier Declaration Form at Appendix 5 prior to any decision being taken.
- 4.5 Job applicants will be asked to declare any interests, for example, if they are connected to a current member of staff, a Board Member, or if they receive services from us. If any applicants make a disclosure, the appropriate part of the Entitlements, Payments and Benefits Procedure should be followed, and registers updated accordingly.
- 4.6 The Registers will be open to public inspection and information will also be available on our website.

BOARD MEETING

- 5.1 Board Members and Staff who are invited to be present at a meeting where a matter in which they have a personal (or a personal business or financial) interest is discussed, must inform the meeting Chair at the start of the meeting. If there is a clear and substantial conflict of interest, a Member or employee should withdraw from the meeting. If in any doubt, they should ask the meeting Chair or another senior person present for guidance. This applies to all meetings that they attend as a member of our Governing Body – both internal and external.

- 5.2 If during the course of Board Meetings, issues arise which may affect a Board Member's personal interest, the Member should disclose precisely any direct or indirect pecuniary interest or other interests which are not pecuniary, but which might influence judgement or give the impression that the Board Member was acting for personal motives. Any Board Member declaring such an interest should withdraw from that part of the meeting in which such matters are discussed. If such conflicts of interest are substantial or frequent, then the Member should consider resigning in conformity with para 9.3 in the Code of Conduct.
- 5.3 A Board Member, having a pecuniary interest in the tenancy of a house belonging to the Partnership may take part in discussion of housing matters and may vote on such matters. However, tenant Board Members should regard matters specifically concerning their individual circumstances as clear and substantial conflict which should be declared in the normal way.
- 5.4 Where an interest is declared in accordance with the above at any meetings of the Board, the declaration must be recorded in the Minutes of that meeting together with any action taken. A copy of the Minutes will be separately forwarded to the Secretary for recording and held specifically for this purpose.
- 5.5 In general, Board Members should:
- a) ensure that his private or personal interests does not influence his decisions, and that he does not use his position to obtain personal gain or any sort, either for himself directly, or for his family, friends, associates or his employer; and
 - b) ensure that no special advantage is gained by virtue of Board Membership, by using the services of a consultant, contractor, professional advisor or other individual or firm that works for the Partnership.
- 5.6 The Company Secretary will advise the Governance Officer of any declarations made and the decision made regarding the staff members attendance at the meeting.

MEMBERSHIP OF CERTAIN ORGANISATIONS

- 6.1 Board Members and Staff should declare to the Chief Executive if they are a member of any organisation which is not open to the public and which has secrecy about its rules and membership or conduct. A definition of such an organisation is on both Staff and Board Disclosure of Interest Forms at Appendix 2.

RELATED POLICIES & PROCEDURES

7.1 The following policies and procedures are referenced as part of this Policy:

Code of Conduct for Staff

Code of Conduct for Board Members

Entitlements Payments & Benefits Policy

MONITORING AND REVIEW OF POLICY

Breaches of Policy

- 8.1 Any failure to make a complete, accurate and prompt declaration of interest – whether deliberately or through taking insufficient care - will be regarded as a breach of this policy and the Codes of Conduct.
- 8.2 If a Board Member knowingly breaches the conditions of this policy this may be grounds for removal from Office in accordance with the Partnership's Rules (44.6.3), Code of Conduct for Board Members and associated protocol.
- 8.3 If a Staff member knowingly breaches the conditions of this policy they would be subject to disciplinary action.

Review

- 9.1 The Board will review this policy at least every three years.
- 9.2 On an annual basis, the Disclosure Registers will be reviewed and a report will be submitted to the Board on the contents.

Responsibilities

- 10.1 The Board will be responsible for:
- a) the formulation and monitoring of the Policy;
 - b) policy amendments; and
 - c) monitoring of statutory requirements.
- 10.2 The Executive Office will be responsible for maintaining Disclosure of Interest Registers.

INTERPRETATIONS & ABBREVIATIONS

The following interpretation and abbreviations are used in this policy:

WORD	INTERPRETATION
<i>HHP or Partnership</i>	Hebridean Housing Partnership
<i>Board</i>	Means the Board of the Hebridean Housing Partnership
<i>Board Members</i>	All Members of the Board including co-opted Members
<i>The Code</i>	The Code of Conduct for Board Members or the Code of Conduct for Staff
<i>Contractor</i>	An individual, organisation or business from whom HHP procures services, for example, as part of the Framework agreement.
<i>Disclosee</i>	Individual making a disclosure of interest.
<i>EPB Policy</i>	The Entitlements, Payments & Benefits Policy
<i>EPB Procedure</i>	The Entitlements, Payments & Benefits Procedure
<i>Framework</i>	HHP's Repair & Maintenance Framework Contract
<i>HHP or Partnership</i>	Hebridean Housing Partnership
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	



HHP is a registered society under the Co-operative and Community Benefit Societies Act 2014, Registered Number: 2644R(S), Registered Office: Creed Court, Gleann Seileach Business Park, Willowglen Road, Stornoway, Isle of Lewis HS1 2QP. It is a charity registered in Scotland, Charity Number: SC035767, registered as Registered Social Landlord with the Scottish Housing Regulator, Registration Number: 359 and registered as a Property Factor, Registration Number PF000183

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APPENDIX 1



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

The following table outlines those who you should consider when declaring interests:

Group 1 Members of your household	Group 2 People closely associated with you	Group 3 Others you may need to consider
Anyone who normally lives as part of your household, whether they are related to you or not, including spouses/partners who work away from home and sons and daughters who are studying away from home.	• Parents, parents-in-law and their partners; • Sons and daughters; stepsons and step-daughters and their partners; • Brothers and sisters and their partners; • A partner's parent, child, brother or sister; • Grandparents, grandchildren and their partners; • Someone who is dependent on you or whom you are dependent on; and • Close friends.	Other relatives (e.g. uncles, aunts, nieces, nephews & their partners).

HHP is a Registered Charity (No. SC035767); A Registered Society under the Co-operative and Community Benefit Societies Act 2014

Reg No 2644R(S); Registered Social Landlord Reg No:359; Registered Property Factor: PF000183



2025/26 BOARD & COMMITTEE MEETING DISCLOSURE OF INTEREST REGISTER

Meeting	Date	Board Member	Item No. on Agenda	Reason
Board	19 Nov 24	XXXXX	6.3	XXXXX

Registered Charity No: SC035767

APPENDIX 3

DECLARATION OF INTEREST - REQUEST FOR APPROVAL FORM

SECTION 1 – REQUESTING AUTHORISATION

DATE OF REQUEST	
DEPARTMENT / AREA MAKING REQUEST	
NAME OF EMPLOYEE / BOARD MEMBER MAKING DECLARATION	
WHAT IS THE TYPE OF DECLARATION?	
WHEN DOES THIS NEED TO BE APPROVED BY?	

SECTION 2 – APPROVING THE DECLARED INTEREST

WHO SHOULD APPROVE THIS REQUEST?	
APPROVED / REJECTED	
DATE APPROVAL / REJECTION GRANTED	
REASON FOR REJECTION IF APPLICABLE	
HAS REQUESTEE BEEN NOTIFIED OF DECISION?	
GOVERNANCE SIGN OFF	

USE OF A CONTRACTOR / SUPPLIER DECLARATION FORM

Name.....

Department.....

Date.....

Chair/CEO notified about the use of the contractor/ supplier

Advice given by the Chair/CEO

*I confirm that **I require/or have already used***, the services of the following contractor who is on the Partnership's Contractor List:*

Contractor Name	Address	Type of Work or Service	Date work to be carried out	Estimated Value

*Are quotes attached Yes/No **

*Are receipts attached: Yes/No**

If no quotes or receipts are attached, please explain why?

*(*delete as appropriate)*

Declaration

I confirm that I have not received any advantage or preferential treatment (financial or otherwise) from the contractor or supplier arising out of their connection to the Partnership and I have complied with the Entitlements, payments and Benefits policy and code of Conduct.

Signature.....

Date.....

For Executive Office use only



Disclosure of Interest Form

Name

Address

Postcode

Is this a HHP property?

Yes

No

Are you

The
tenant?

Living with
tenant?

Phone Numbers

Home:

Work:

Mobile:

Year of Birth

Job Title

Please list any positions of public responsibility you have:

Please list any Memberships of other Housing Partnerships or Co-operatives and Secret Societies (see attached note on definition of a Secret Society):

Please declare any financial interest relating to the work of the Partnership:

Please list any direct involvement with a business that trades for profit:

Please list any involvement with any organisations from which the Partnership may secure a loan:

Please declare any involvement with any organisation which may seek services from the Partnership:

Please declare any relationships with or between Staff Members, Board Members and their close relatives or any tenants (you may continue on another sheet):

--

Please declare any voluntary or charity work carried out for another organisation with a base in the Western Isles :

Please declare any other interests which could impact on their membership of the Board of Hebridean Housing :

Have you read, and do you understand, the policy on Entitlements, Payments &

Benefits? ☐ YES ☐ NO

Signature

--

Date

--

DEFINITIONS OF A SECRET SOCIETY

A secret society is any lodge, chapter, society, trust or regular gathering or meeting which:

- Is not open to members of the public who are not members of that lodge, chapter, society or trust;
- Includes in the grant of membership an obligation or requirement on the part of the member to make a commitment (whether by oath or otherwise) of allegiance to the lodge, chapter, society, gathering or meeting; and
- Includes, whether initially or subsequently, a commitment (whether by oath or otherwise) of secrecy about rules, membership or conduct of the lodge, chapter, society, trust, gathering or meeting.
- A lodge, chapter, society, trust, gathering or meeting as defined above, should not be regarded as a secret society if it forms part of the activity of a generally recognised religion, nor should a chapter or branch of a trade union.