



# ***Declaration of Interests Policy***

***Reviewed: Mar 2026***  
***Next Review: Mar 2029***



## 1. Purpose of this Policy

- 1.1 This Policy describes how Rosehill will ensure that all relevant interests of members of the Management Committee and Staff are declared and managed in a transparent, accountable way. Unless stated otherwise the reference to “Our People” includes Committee and Staff.
- 1.2 The subject of declaring interests is covered in our Entitlements, Payments and Benefits Policy and our Codes of Conduct for Committee and Staff. The purpose of this policy is to supplement the information in these documents and provide further information about the declaration and management of relevant interests.

## 2. Regulatory Requirements

- 2.1 We must comply with the Scottish Housing Regulator’s requirements including the Standards of Governance and Financial Management when conducting the business of Rosehill. The following requirements are relevant to this Policy and must be adhered to:

Standard 1 - The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.

1.6 - Each governing body member always acts in the best interests of the RSL and its tenants and service users and does not place any personal or other interest ahead of their primary duty to the RSL.

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

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.

5.2 - The RSL upholds and promotes the standards of behaviour and conduct it expects of governing body members and staff through an appropriate code of conduct. It manages governing body members’ performance, ensures compliance, and has a robust system to deal with any breach of the code.

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.

5.6 - There are clear procedures for employees and governing body members to raise concerns or whistleblow if they believe there has been fraud, corruption, or other wrongdoing within the RSL.

2.2 To ensure compliance we are expected to have a clear policy and procedures in place which make sure Rosehill acts with transparency, honesty and propriety and avoids any public perception of improper conduct.

### 3. Other Relevant Policies

3.1 This Policy is linked with the following Policies:

Entitlements, Payments and Benefits  
Codes of Conduct: Committee and Staff  
Gifts and Hospitality  
Prevention of Fraud and Anti-Bribery  
Whistleblowing

### 4. Obligations of Our People

4.1 Committee and Staff should declare all interests that could be seen by others as influencing their actions or decisions. Even if it is established afterwards that there is no conflict of interests, an open approach to declaring interests will protect our people and Rosehill against any impression that decisions have been made improperly or for personal motives.

### 5. Putting these obligations into practice

#### 5.1 Declaring Interests

5.1.1 New Committee Members and Staff are required to complete a Declaration of Interests Form as part of their induction process. The form is a record of any interests our people or anyone connected to them have which are relevant to our business and/or activities. Thereafter, all Committee and Staff are required to review their forms annually,

5.1.2 From the information gathered from the Declaration of Interests Form, we will maintain a Register of Interests. As a minimum the Register will be reviewed as part of the annual review of declared interests. However, it is the personal responsibility of our people to ensure their entries on our Register are kept up-to-date, by declaring any changes as soon as they occur or they become aware of them e.g. any changes to existing declared interests or any new interests that arise. The Register is published on our website.

5.1.3 Committee Members must declare if they have an interest in any business to be discussed or considered at a meeting of the Management

Committee or a Sub-Committee. To assist with this, Declaration of Interests is a standing agenda item at the start of each meeting.

5.1.4 Our Rules require that any committee member who has an interest in a matter that is being considered withdraws from all discussions and plays no part in decision-making. Where a Committee Member has a personal or business interest in any matter that is being discussed or considered, including at a meeting (or someone connected to them has), he/she must declare their interest and play no part in the consideration, discussion or decision-making; he/she must withdraw from any part of a meeting where the interest arises. This requirement does not apply to committee 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 the 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.

5.1.5 Any interests declared at Management Committee or Sub-Committee meetings will be recorded in the minutes of the meeting. If the Management Committee decides that a potential conflict of interest exists, the minutes of the meeting will also record the Committee's decision about how the conflict should be managed.

## 6. What type of interests must be declared?

6.1 Our people must declare any outside activities/interests and any personal relationships that could affect – or be seen by others to affect - the way they carry out their duties.

6.2 Examples of the types of interests that must always be declared include:

- 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 area(s) we serve.
- Voluntary work with another RSL or with an 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).
- 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 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.

6.3 Please note that the above list is not exhaustive, and there may be other interests that our people should also declare.

6.4 Our Entitlements, Payments and Benefits Policy sets out who else our people should consider when declaring interests and covers two groups: Members of their households and, Partners, Relatives and Friends. In terms of household members, our people are expected to be aware of and declare any relevant interests of those members. In relation to the second group, our people are also expected to be aware of and declare any relevant interests of those people where they have a close connection and are in regular contact. If there is no close connection or regular contact, our people are not expected to be aware of or go to unreasonable lengths to identify any relevant interests/actions. However, if they happen to become aware of relevant interests/actions they must declare and manage these as soon as possible.

6.5 The following are the relevant actions /involvement by those **to whom our people are closely connected** that they should consider, declare and manage as per our expectations outlined in Table A of the Entitlements, Payments and Benefits Policy (please be aware that this list is not exhaustive or exclusive and that some interests and their potential conflicts cannot be reconciled with the purpose and terms of the Entitlements, Payments and Benefits Policy):

- A significant interest in a company or supplier that we do business with (or are considering doing business with). A significant interest means ownership (whole or part) or a substantial shareholding in a business that distributes profits, but does **not** include where an individual has shares in large companies such as banks, utility companies or national corporations, i.e. where owning shares would not give the individual any significant influence over the activities of that organisation.

- Where the individual may benefit financially from a company or supplier with which we do business (or are considering doing business with)
- Involvement in the management of any company or supplier with which we do business (or are considering doing business with)
- 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 Committee or any of its subsidiaries
- Application to be a tenant or service user of Rosehill Housing Association Limited or any of its subsidiaries

6.6 Our Entitlements, Payments and Benefits Policy also sets out what payments and benefits are permissible, some of which will require our people to declare an interest. For example, if a relative of a Committee Member is being considered for a tenancy or a relative of a staff member has applied for a job at Rosehill. The Policy sets out the required processes to be followed in such cases.

## 7. Dealing with any interests that are declared

7.1 Where a committee member has declared an interest, the remaining members of the committee will consider whether there is any conflict of interests involved and, if so, how it should be managed. A conflict of interests is a situation in which the member's objectivity would be affected (or could be seen by others to be affected) if they were to participate in the Committee's decisions on a particular matter.

7.2 Committee members will **always** be required to withdraw from committee meetings because of a potential conflict of interests, if the matter for discussion involves:

- The committee member's individual circumstances or the circumstances of anyone with whom the committee member has a family or close personal relationship;
- Any permitted payments or benefits under the Entitlements, Payments and Benefits Policy that are linked with the requirement to declare.
- 73 Otherwise, the remaining Committee members will take account of the interests that have been declared and whether a material conflict of interests arises. Depending on these factors, the remaining members of the Committee will ask the member concerned to withdraw from that part of the meeting;

7.3 A declaration or conflict of interest will not by itself prevent the Management Committee from approving a particular course of action, if

the course of action is lawful and is consistent with the policies of Rosehill and in the best interests of the organisation and its tenants.

- 7.4 If decisions will benefit one of our people personally or any person or organisation with whom they are associated, the Management Committee will also take account of how others may perceive its decisions. For example, could a decision be defended to Rosehill's tenants and Regulators, or in the face of media interest?

## 8. Complying with the Policy

- 8.1 Complying with this Policy is an essential requirement for all of our people. Failure to follow the Policy may be deemed as a breach of the Codes of Conduct and result in appropriate action being taken against the individual. If committee members are unsure about whether they need to declare an interest, they should seek advice from the Chair or the Chief Executive. In the case of a staff member, they should seek advice from the Chief Executive or the Corporate Services and HR Manager.

## 9. Risk Management

- 9.1 In all key areas of our business we need to consider any risks which may arise. To this end we have in place a robust Risk Management Policy and from this flows our Risk Register. We have identified our strategic risks which are regularly monitored by our Management Team, Audit & Risk Sub-Committee and Management Committee.

- 9.2 Strong and effective Governance is fundamental to Rosehill's success as a business and to upholding its reputation. We recognise that not having a raft of governance policies and processes in place and ensuring adherence to them can lead to a number of risks including: poor governance, lack of confidence by our tenants, other service users and stakeholders; reputational damage and Regulatory intervention.

- 9.3 To mitigate such risks it is essential that we have a clear and comprehensive policy in place governing the declaration and management of relevant interests, which will ensure Rosehill acts with transparency, honesty and propriety and avoids any public perception of improper conduct.

## 10. Data Protection

- 10.1 On the 25<sup>th</sup> May 2018 the legislation governing data protection changed with the introduction of the General Data Protection Regulation (GDPR). Following the UK's exit from the EU, and the end of the transition period which followed, the GDPR formed part of the retained

EU law and became the UK GDPR which together with the Data Protection Act 2018 constitute the UK's data protection legislation.

## 11. Equalities and Human Rights

11.1 Rosehill's Equality and Human Rights policy (January 2024) outlines our commitment to zero tolerance of unfair treatment or discrimination towards any individuals or group of individuals, particularly those belonging to a protected characteristics (as defined by the Equality Act (2010)). This includes ensuring everyone has equal access to information and services, by making copies of all policies available in a variety range of alternative formats (i.e. large print, translated, etc.) in response to reasonable requests.

11.2 Rosehill is aware of the potential for policies to inadvertently discriminate against individuals or group of individuals. To help address this we carry out Equality Impact Assessments (EIA) to help identify any part of a policy that may be discriminatory so this can be addressed (please see Section 9 of our Equality and Human Rights policy for more information).

11.3 As this policy applies equally to all groups, Rosehill (with committee approval) made the decision not to carry-out an Equality Impact Assessment on this policy.

## 12. Review

12.1 This policy will be reviewed as a minimum every 3 years or sooner if required to ensure it continues to comply with legal and regulatory requirements.



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Registered Scottish Charity, No. SC053776. Company Registration No. SP02220R.  
A registered society under the Co-operative and Community Benefit Societies Act 2014 No. 2220R(S) and with  
The Scottish Housing Regulator (Number HAC174).



**ROSEHILL HOUSING ASSOCIATION LIMITED  
DECLARATION OF INTERESTS FORM**

This form should be completed to record any interests you may need to declare under the Code of Conduct. Leave blank any boxes that are not relevant to the declaration you are making.

<b>Your Name</b>	
<b>Date of Declaration</b>	
<b><u>Details of the Declaration</u></b>	
<b>No interests which need to be declared</b> (please tick the box opposite, then sign the form), <b><u>OR</u></b>	
<p>Do you, your spouse/partner or any family members have any involvement with any business trading for profit that:</p> <ul style="list-style-type: none"> <li>• Currently works for Rosehill?</li> <li>• May seek work from Rosehill in future?</li> </ul> <p>If yes, please give details of the business involved, and the position (e.g. proprietor, manager, other employee) held by yourself or the person covered by the declaration</p>	
<p>Please give details if you are related to or have a close personal relationship with any of Rosehill's:</p> <ul style="list-style-type: none"> <li>• Employees</li> <li>• Committee members</li> </ul>	
<p>Please give details if you are aware that you are related to any of Rosehill's:</p> <ul style="list-style-type: none"> <li>• Tenants/service users</li> <li>• Housing applicants</li> </ul>	

Please give details of any other positions of public responsibility you hold (for example, if you are an elected councillor, or on the committee of another housing association/co-operative)	
Please give details of any other voluntary or community organisations you are a member of, which have any dealings with Rosehill	
Is there any reason why this declaration should be regarded as confidential?	
<b>Signed:</b>	
<b>Date:</b>	