

**For Approval**

**Agenda Item: 12.2**  
**Date of Meeting: 25/03/26**

**To:** The Management Committee  
**From:** The Director  
**Subject:** Review of Declaration of Interests Policy

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**1. Introduction and Purpose**

- 1.1 As Committee is aware this policy was originally due for review in June 2025, as per the Policy Review Timetable 2025/26. However, it was decided that it would be put on hold until the revised Model Entitlements, Payments and Benefits Policy (EPB Policy) was published by SFHA. The revised Model was only issued by SFHA in January 2026 and was approved by Committee at its meeting later that month.
- 1.2 The purpose of this report is to present the proposed changes to the Declaration of Interests Policy, in light of the revised EPB Policy for Committee's consideration and approval.

**2. Review of Declaration of Interests Policy**

- 2.1 The current Policy and a track change version are available on the board portal as follows:  
  
Resources > Policies > Policy Reviews 2025/26 > Policies for Review March 2026 > Declaration of Interests Policy Mar 2026
- 2.2 Attached is the clean version of the revised Policy with the main changes highlighted in yellow.
- 2.3 A summary of the main changes to the Policy are as follows:

Section 5: Putting these obligations into practice, para 5.1.4 – deletion of existing wording and replacement with wording in line with Model EPB Policy:

“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."

Section 6: What types of interests must be declared? Para 6.2 – delete existing list of examples and replaced with wording in line with Model EPB Policy:

- 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.

A new para 6.5 to align with the EPB Policy – “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”

Section 7: Dealing with any interests that are declared, para 7.1 – deletion of existing paragraph as not in line with EPB Policy;  
Renumbered para 7.3 – deletion of 2<sup>nd</sup> bullet point;

- 2.4 In general any references to “Director” have been updated to “Chief Executive”.
- 2.5 In relation to the Equalities and Human Rights section, Committee must decide which of the two options shown in the draft revised Policy should be in the final version. I would suggest that as the Policy applies to everyone that it is the second option:

“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.”

### 3. Risk

- 3.1 We have considered risk in relation to declaration of interests and have identified the main risks under the following risk categories:

Risk Category	Mitigating Measure
<b>Governance:</b>	

Committee and staff unclear as to what interests require to be declared and managed;	Having an up-to-date Policy governing declarations of interest which is in line with our EPB Policy; Policy easily accessible by Committee and Staff Maintaining of Register of Interests
<b>Legislative and Regulatory:</b> Breach of Declaration of Interests Policy Breach of Codes of Conduct Breach of Regulatory Requirements (Standard 1 and 5)	As above
<b>Reputation:</b> Rosehill's integrity called into question; Public perception of wrong doing	As above
<b>People:</b> Dependent on severity of breach could result in disciplinary action against staff or action against Committee if breaching Code of Conduct	As above

#### 4. Delivery of our Strategic Objectives

Area	Related Strategic Objective(s)
Review of Declaration of Interests Policy	7) Achieve the highest standards in all that we do

#### 5. Application of our Core Values

Area	Related Core Value(s)
Review of Declaration of Interests Policy	<ul style="list-style-type: none"> <li>• Accountable and Compliant</li> <li>• Excellent and Committed</li> </ul>

#### 6. Compliance and Assurance

- 6.1 Ensuring we have a clear policy in place to govern how our people declare and manage any conflicts of interests, means we are meeting Regulatory requirements with particular reference to the following:

Compliance Source	Details
The Standards of Governance and Financial Management for RSLs	<p><b>Standard 1</b> - The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.</p> <p><b>Guidance 1.6</b> - 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.</p> <p><b>Standard 5</b> - The RSL conducts its affairs with honesty and integrity.</p> <p><b>Guidance 5.1</b> - 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.</p> <p><b>Guidance 5.4</b> - 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.</p>

## 6.2 Evidence Bank

Evidence	Assurance Exercise Location
<ul style="list-style-type: none"> <li>Report for Committee Meeting on 25/03/26</li> <li>Revised Declaration of Interests Policy</li> </ul>	<p>Regulatory Standard 1 – Guidance 1.6</p> <p>Regulatory Standard 5 – Guidance 5.1 and 5.4</p>

6.2.1 Committee is reminded that our Assurance Exercises are available in the Committee Log-in Area of our website, which Committee can access at any time.

## 7. Summary

- 7.1 The review of the Declaration of Interests Policy was postponed (due in June 2025) until the revised Model EPB Policy was published by SFHA. The Model EPB Policy was issued by SFHA in January 2026 and adopted by Committee at its January meeting.
- 7.2 The Declaration of Interests Policy has been reviewed in light of the revised EPB Policy, which has resulted in some changes, which are set out in Section 2.
- 7.3 Risk has been considered at Section 3.
- 7.4 Section 4 shows how reviewing the Declaration of Interests Policy, contributes to the delivery of our strategic objectives.
- 7.5 Section 5 shows how reviewing the Declaration of Interests Policy, contributes to the application of our Core Values.
- 7.6 Section 6 sets out how we comply with Regulatory requirements.
- 7.7 Committee is asked to consider this report and the draft revised Declaration of Interests Policy. Committee is further asked to decide on the following:
- To approve the revised Declaration of Interests Policy
  - What option, from the following, should be included in the Equalities and Human Rights Statement:
- 11.1 In accordance with our Equality and Human Rights Policy, we have carried out an EIA on this policy which is appended to the end of this policy.
- or
- 11.1 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.