



Title	Probity Policy
Scope	This policy applies to all operating businesses within emh group
Author	Executive Director, Corporate Services
Date Approved Approved By	Reviewed March 2017 Approved September 2017 - Emh group Board
Review Date	2020
Key Values	Integrity – ensuring we maintain the highest ethical standards. Accountability- being accountable to our customers and stakeholders Openness – Being open and transparent in all areas of the business.
Business Plan Objectives	b) To provide excellent, locally accountable customer services with customers at the heart of everything that we do. e) To provide effective and efficient business support services that provide value for money and promote continuous improvement.

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Part A: Introduction

1. Why do we have a Probity Policy?

- 1.1 East Midlands Housing Group (EMH Group) is committed to achieving the highest standards of probity and good governance in all its activities. EMH Group promotes openness and transparency in all aspects of its work. It expects each of us as shareholders, Board and Committee Members and employees to practice those principles too.
- 1.2 Our conduct as individuals impacts directly on EMH Group's public reputation and we must all strive to conduct the business in ways that will maintain the good reputation of the sector.
- 1.3 Our Board has ultimate responsibility for ensuring EMH Group's policies and procedures maintain the standards of probity required by the sector. This responsibility comes from the law, from the expectations of our regulator and in order to meet recognised best practice in the housing, public and third sectors.
- 1.4 All Group members, including organisations not registered with the Homes and Communities Agency will be expected to adhere to this policy.

2. Who does the Probity Policy apply to?

- 2.1 This Policy applies to all employees, shareholders, Trustees, Board Members, Committee Members and involved residents of EMH Group or its subsidiaries at any time.
- 2.2 All of the people listed above are required by EMH Group to familiarise themselves with this Policy and the processes and procedures contained within it, and to make sure they follow it at all times throughout their relationship with EMH Group.
- 2.3 You also need to be aware that the Probity Policy applies not only to people who are directly involved with EMH Group as Trustees, Board or Committee Members, employees or involved residents, but also family members and businesses associated with those people. Where are aware that you have a family member or a business that is caught by any aspect of this Policy it is your responsibility to make sure you disclose your relationship with them, the potential payments or benefits proposed and follow the Policy.
- 3.4 Paragraph 4 sets out what happens in the event of a breach and what it would mean for you.

3. What does the Probity Policy have to cover?

- 3.1 There are various purposes to the Probity Policy. In the main these fulfil three needs:
 - to ensure EMH Group complies with the law
 - to ensure EMH Group complies with the requirements of its regulators
 - to demonstrate EMH Group follows best practice
- 3.2 **The law**
 - 3.2.1 This Policy sets out procedures to make sure that EMH Group complies with section 122 of the 2008 Act.
- 3.3 **Regulatory requirements**

3.3.1 Under the current regulatory framework, the Group must “*adopt and comply with an appropriate code of governance. Governance arrangements should establish and maintain clear roles, responsibilities and accountabilities for their board, chair and chief executive and ensure appropriate probity arrangements are in place.*” There is also a requirement that we “*safeguard taxpayers’ interests and the reputation of the sector.*”

3.3.2 The National Housing Federation have published a “Code of Conduct 2012” to help its members achieve the highest standards of conduct and safeguard the sector’s reputation for integrity. NHF Members are expected to comply with this Code of Conduct 2012.

3.4 Best practice

3.4.1 In addition to the Code itself, with which NHF members would be expected to comply, the National Housing Federation Code of Conduct 2012 sets out additional good practice that members may choose to follow wholly or in part. The main principles of the Code are:

Probity	Housing associations must maintain the highest standards of probity and conduct.
Loyalty and conflict of interest	Housing associations must ensure that their board members, staff and involved residents act, and are seen to act, wholly in the interests of the organisation and its residents and other service users. All actual or potential conflicts or dualities of interest must be openly declared and properly resolved.
Remuneration	Remuneration decisions must be lawful, transparent, fair and proportionate.
Personal benefit	Housing associations must demonstrate that board members, staff and involved residents, and those with whom they are closely connected, receive no preferential consideration in the provision of benefits such as housing accommodation or employment.
Prevention of bribery and corruption	Housing associations must adopt and comply with appropriate policies and procedures to prevent bribery and corruption.
Respect	Housing associations must adopt and promote standards to ensure that the conduct of board members staff and involved residents at meetings, events, and in the workplace demonstrates respect for all and promotes the values of the organisation.

3.4.2 EMH Group will periodically map its compliance against both the Code and the good practice set out within the Code, and agree with its Board any areas for continuous improvement or review.

4. What happens if we don’t follow the Probity Policy?

4.1 If we don’t follow the Probity Policy, this can have serious implications for EMH Group and the sector including:

- Creating legal risks for EMH Group, for example if the effects of the breach are that the law has been broken or procurement regulations not followed correctly
- Putting EMH Group at risk of attracting the attention of its regulator(s), who have a

range of powers they can use against EMH Group to sort out problems they perceive with it

- Negatively affecting the reputation of EMH Group and that of the sector
- Having serious implications for individuals. If
 - Employees have breached their terms and conditions they can be disciplined or even lose their jobs
 - Board Members/Trustees have breached their duties and responsibilities, they can be personally liable to EMH Group for any losses or liabilities it suffers as a result
 - Committee Members have breached EMH Group's expectations of them they can be removed or disciplined.

4.2 Therefore it is important that each of us makes sure that we understand and follow every applicable aspect of the Probity Policy at all times.

5. Other policies and procedures

5.1 This Probity Policy needs to be read alongside EMH Group's Codes of Conduct for employees, Board Members and Involved Residents. Where this Policy conflicts with any provision of other policies and procedures, this Policy will prevail.

6. Mechanics about the Probity Policy

6.1 Who is responsible for keeping up to date?

6.1.1 The Group Board has overall responsibility for ensuring that all of EMH Group's policies and procedures are kept up to date. It has delegated to the Company Secretary the specific responsibility for maintaining general awareness of and compliance with this Probity Policy.

6.2 When and how will this Policy be reviewed?

6.2.1 This Policy will be reviewed by the Board periodically and no less frequently than every 3 years.

6.3 Definitions used in the Probity Policy

6.3.1 The following terms used in this Probity Policy will have the following meanings:

“Act”	the Housing and Regeneration Act 2008
“benefit”	includes, but is not limited to: <ul style="list-style-type: none">• ex-gratia gifts or benefits;• the grant of a loan;• the award of a contract of employment;• sale of a property for value under right to buy or right to acquire;• the grant of a tenancy or licence;

	<ul style="list-style-type: none"> the grant of a lease (e.g. shared ownership); award of any type of commercial contract (e.g. contract for services).
“Board”	the Board of Management of EMH Group or its subsidiaries
“Board Member”	means a member or Trustee of the Board or its Subsidiaries or its Committees. Co-optees are included in this definition.
“Bonus”	a discretionary payment reflecting good performance under any contract
“Close Relative” or “those with whom they are closely connected”	any person so close to an Board Member/Employee/involved resident there is a real risk any decision or judgement of that Board Member/Employee could be influenced, including a person’s husband, wife, partner, parents, parents-in-law, grandparents, children, step-children grandchildren, brothers, sisters, brother or sister of a partner, niece, nephew, aunt, uncle, the partners of any of these and similar relations by marriage and any dependents and any person on whom the individual depends. This includes any estranged, separated and divorced people with whom they are closely connected
“Constitution”	EMH Group’s and its subsidiaries’ Rules, Memorandum and Articles of Association
“Employee”	a person employed by EMH Group or any other Group Member under a contract of employment, including a member of the Executive Team
“Executive Management Team”	the senior management team of EMH Group, including the Group Chief Executive / Executive Director Finance / Executive Director Development / Executive Director Corporate Services/ Executive Director Housing / Executive Director Care and Support.
“involved resident”	Includes residents and service users who are involved in delivering, or scrutinising, the organisation’s business activities. This includes members of the Scrutiny Panel, Co-Ordinating Committee, and those residents involved in the procurement of goods or services.
“Group”	the Group of companies of which EMH Group is the parent, comprising: <ul style="list-style-type: none"> emh group emh homes (emh housing & regeneration) emh care & support sharpes garden services midlands rural housing emh treasury
“Shareholder”	a member/shareholder of EMH Group or of any other member of the Group
“NHF Code”	the National Housing Federation’s “Code of Conduct 2012”
“Regulatory Framework”	the Homes and Communities Agency (HCA) “The Regulatory Framework for Social Housing in England from April 2012” and “Regulating the Standards 2016”

“Relevant Person”	1) any Board Member, Trustee, Committee Member or Employee, involved resident or any person who, in the preceding 12 months, was a Board Member, Committee Member, involved resident or Employee; 2) a Close Relative of any person within paragraph 1 above; or 3) a business trading for profit of which a director is a person falling within paragraphs 1 or 2 above.
“Resident”	“Residents” and “other service users” includes residents, tenants, leaseholders and users of other services provided by the association.
“HCA”	the Homes and Communities Agency (or any organisation taking on its regulatory functions)

7. PROMOTING STANDARDS OF PROBITY

- 7.1 The Company Secretary shall ensure that all Employees, Board Members and Involved Residents are aware of the contents of the Probity Policy and of their responsibilities under this policy. The responsibilities of individual Board Members, Involved Residents and Employees with regard to Probity Training on the Probity Policy and associated Codes of Conduct shall form part of the induction programme for all staff, Board Members and involved residents. Follow up training shall be provided periodically thereafter with a target set of every three years.

Part B: Probity Requirements

This Part of the Probity Policy lists the specific probity requirements that we must observe.

1. Payments to Shareholders

- 1.1 This section applies to individuals who are shareholders, people who have been shareholders at any time, their close relatives and companies of which any of these people are directors.
- 1.2 Section 122 of the Act restricts EMH Group from making any gift or paying any dividend or bonus to any of the people listed in paragraph 1.1 above.
- 1.3 There is one relevant exception to this restriction that is relevant to EMH Group, and it can be relied upon as long as these gifts or payments are also permitted by EMH Group’s Constitution:
- (a) payments of interest due on capital lent by members or former members to the Association or subscribed in its shares; or
 - (b) payments made to another RP which is an associate or subsidiary of the Association – this would include East Midlands Housing Group and EMH Housing and Regeneration Limited (trading as emh homes).
- 1.4 If a payment is made in breach of paragraph 1.2 of Part B this policy and which does not fall within the exception in paragraph 1.3 of Part B EMH Group has the right under the Act to recover the wrongful gift or payment as a debt from the recipient. The Regulator may also require EMH Group to take action to recover such a wrongful gift or payment.

2. Payments to Board and Committee Members

2.1 This section applies to any Board or Committee Member within EMH Group or its subsidiaries.

2.2 **Remuneration**

2.2.1 EMH Group only allows payments and benefits to Board and Committee Members under individual contracts (known as a Board Member Deed of Agreement for Services) for services with Board Members, or as permitted by this Probity Policy.

2.2.2 Such payments and benefits shall only be for services carried out as a Board Member and not for additional services provided to EMH Group from time to time (which are generally prohibited).

2.2.3 Levels of Board member pay shall be proportionate to the association's size, complexity and resources. Payment shall be linked to members carrying out specific functions against which performance is reviewed.

2.2.4 EMH Group shall make an annual disclosure in its accounts on the level of payment made to the Chair and individual board members.

2.3 **Expenses**

2.3.1 To assist in the proper performance of their duties, EMH Group may reimburse Board Members for reasonable expenses legitimately incurred in the course of their duties. These reasonable expenses are set out in the Group's Board Member Expenses Policy.

2.3.2 Board Members must follow the appropriate procedures prescribed by EMH Group in claiming or reclaiming any expenses they have incurred from time to time. Further details can be found in the Board Members' Expenses Policy.

2.3.3 EMH Group is under no obligation to pay or repay any expenses claimed by a Board Member who is unable to produce appropriate receipts or other evidence that they have been incurred.

2.3.4 Any disputes or disagreements about expenses from time to time will be determined by the Chair of the Board in his or her absolute discretion, unless the Board Member in question is the Chair, in which case the Board will determine the decision.

2.4 **Indemnity**

2.4.1 EMH Group may indemnify a Board Member (or former Board Member) against any expenses incurred by that Board Member in connection with any civil or criminal proceedings in relation to EMH Group or any application for relief from liability for negligence, default, breach of duty or breach of trust in relation to EMH Group.

2.4.2 EMH Group may not indemnify a Board Member (or former Board Member) where:

- (a) the Board Member is convicted in criminal proceedings and the conviction is Final;
- (b) a Final judgment is given against the Board Member and the judgment is Final - for the purposes of this paragraph a judgment, conviction or refusal becomes final where (a) the period for bringing an appeal or further appeal has ended; or (b) an appeal is determined, abandoned or otherwise ceases to have effect.

- (c) the court refuses (and that refusal is Final) the Board Member relief in an application for relief; or
- (d) that indemnity is in respect of any liability of the Board Member to pay a fine imposed in criminal proceedings or a sum payable to a regulatory authority as a penalty for non-compliance with regulatory requirements.

3. Payments to Employees

3.1 Remuneration

- 3.1.1 EMH Group is permitted to make payments of remuneration to Employees where such payments are due under a contract of employment or are otherwise made in accordance with this Policy from time to time.
- 3.1.2 Remuneration decisions relating to policies and strategies for all Employees will be made by the Remuneration Committee
- 3.1.3 EMH Group will make remuneration decisions transparently and fairly, in accordance with EMH Group's Rules / Articles of Association and remuneration policies from time to time.
- 3.1.4 Levels of executive staff remuneration shall be sufficient to attract, retain and motivate staff of the quality required to run the association successfully and deliver its strategic aims, but shall not be set at an amount in excess of that which is necessary for this purpose.
- 3.1.5 EMH Group shall make an annual disclosure in its certified accounts on the level of the Group Chief Executive's remuneration.

3.2 Benefits

- 3.2.1 EMH Group may only grant benefits of any description to an Employee or Employees where such benefits are permitted under their contract(s) of employment, are otherwise in accordance with this Policy or are approved by the Board of EMH Group.

3.3 Employee Incentives

- 3.3.1 EMH Group may from time to time adopt staff incentive schemes designed to recognise good performance and link rewards to positive and measureable achievements. It is the Group's aim to celebrate achievements at every level and at every opportunity.
- 3.3.2 These incentive schemes may fall outside the terms and conditions of employment. As such they are entirely discretionary and not related to salary or any other benefit that is offered as a term of employment.

3.4 Bonuses

- 3.4.1 EMH Group may make bonus payments to an Employee in accordance with the relevant Employee's contract of employment or any policy on bonuses approved by the Board from time to time.
- 3.4.2 Where a bonus payment is proposed which is not in accordance with the Employee's contract of employment or an established bonus policy of EMH Group, it must be approved by the Board. In deciding whether to approve such a bonus payment, the Board must consider doing so only on evidence of exceptional performance or in exceptional circumstances.

3.4.3 Bonuses must not be paid to any Employee who is also a Shareholder or Close Relative of a Shareholder.

3.4.4 Any bonus payments will be made in accordance with comparable levels in the sector, and having regard to EMH Group's obligations as an RP.

3.5 Severance and redundancy

3.5.1 For the purpose of this Policy, severance payments shall include out of court settlements in relation to cases referred to the Employment Tribunal.

3.5.2 EMH Group may make reasonable and fair severance and redundancy payments to Employees in accordance with its published redundancy and severance policies.

3.5.3 Decisions as to severance and redundancy payments to Employees shall be made by the Executive Management Team in accordance with EMH Group's published severance and redundancy policies, save for those proposed to be made to the Executive Management Team Members, which shall be made by the Remunerations Committee and/or Board in line with their approved terms of reference.

3.5.4 In making a decision as to what is a reasonable and fair level of payment under paragraph 3.4.4 above, the following considerations shall be taken into account:

- (a) the total level of payment due to the Employee contractually, including pension and notice requirements;
- (b) advice from an independent legal advisor and any other suitably qualified persons;
- (c) any relevant statutory formula;
- (d) any published policies of EMH Group;
- (e) any relevant guidance on best practice;
- (f) information on comparable payments made in the sector (if available);
- (g) the Employee's conduct and reasons for departure; and
- (h) potential risks to EMH Group (either by making or not making a payment), including, in relation to out of court settlement payments for employment disputes, the claim's prospects of success, the potential legal costs of defending a matter and the effect on EMH Group if settlement is not made.

3.5.5 The terms of any severance payment will be included within a properly drawn up settlement agreement or similar document.

3.5.6 The total level of severance and redundancy payments made each year will be identified in EMH Group's annual accounts.

3.5.7 EMH Group will exercise particular care to avoid any suggestion of secrecy or impropriety in cases where management failings and/or poor performance or conduct of individual Employees have resulted in the departure of the Employee concerned.

3.6 Subject to paragraphs 3.2 to 3.4 above (inclusive), any non-contractual payment proposed to be made by EMH Group to an Employee must be approved by the Group

Chief Executive for Employees who are not members of the Executive Management Team (EMT), and by the Board or a properly authorised committee for employees who are members of the EMT. “

- 3.7 Settlement Agreements documentation **over the value of the £30,000** requires a signature by the employee’s Executive Director or a member of EMT, on behalf of EMH Group (or by the Board or Authorised Committee member, if the employee is a member of EMT).

4. Benefit schemes

- 4.1 From time to time EMH Group may put in place or arrange to participate in benefit schemes for its Employees and/or tenants and/or Board Members with external organisations where such benefits do not require any payment from EMH Group, such as discount cards for external retail and leisure organisations.
- 4.2 Where such benefit schemes are in place, EMH Group will publish information about the benefit schemes on its website, including any eligibility criteria governing an individual’s ability to participate in such schemes.
- 4.3 If EMH Group is contemplating awarding a contract for the provision of goods or services to any external organisation offering a benefit scheme, the fact the organisation offers a benefit scheme to Employees and/or tenants and/or Board Member should be declared for the purposes of that contract award procedure.
- 4.4 In accordance with EMH Group’s contracts and procurement regulations, no preferential treatment shall be given to any external organisation offering such a benefits scheme to EMH Group’s tenants / Employees / Board Members.

5. Ex gratia payments

- 5.1 In exceptional circumstances as a reward for excellent or long-standing service, ex gratia payments may be made to Employees or Board Members, provided that any such payments do not exceed £200 annually for any one person.
- 5.2 Any ex gratia payments to be made under paragraph 5.1 above shall be approved by the Chair of the Board or Executive Management Team.
- 5.3 EMH Group will publish the total amount of any ex gratia payments in a year within its annual accounts and state the reasons for these payments.

6. Gifts made to Board Members, Employees or involved residents by EMH Group

- 6.1 EMH Group may make a discretionary allowance of up to £50 per occasion for the purchase of gifts for Employees and/or involved residents and/or Board Members, subject to the approval of a member of the Executive Management Team (in the case of Employees) or the Group Chief Executive or Chair of the Board (in the case of members of the Executive Management Team or Board Members), in the following circumstances:
- 6.1.1 leaving EMH Group;
 - 6.1.2 maternity leave;
 - 6.1.3 marriage or civil partnership;
 - 6.1.4 retirement;

6.1.5 bereavement; or

6.1.6 any other circumstances approved by the Board / Executive Team (as applicable).

6.2 Any allowances for the purchase of gifts paid under paragraph 6.1 above are subject to an annual limit of £200 per Employee or Board Member. This limit includes hospitality received from the Group such as the Christmas party (see paragraph 7.1) and any awards under the IDOACE policy. Hospitality from third parties is not included within this limit.

6.3 Any allowance paid for the purchase of gifts under paragraph 6.1 above which exceeds the limits set out in paragraphs 6.1 and 6.2 above must be approved by the Group Chief Executive or Board. Such limits should only be exceeded in exceptional circumstances.

6.4 EMH Group may make a discretionary allowance of up to £200 per occasion for the purchase of gifts for Employees and / or Board Members and/or involved residents, subject to the approval of the Board, where an Employee is retiring from or leaving EMH Group following 10 or more years' continuous service or Board Member is retiring from or leaving EMH Group following 9 years' continuous service.

6.5 No allowance may be made for the purchase of gifts, nor may any other gift be made to any person or organisation which falls within one of the following categories:

6.5.1 Shareholders, former Shareholders or others to whom they are closely related; or

6.5.2 a company which has a person falling within paragraph 6.5.1 above as a director.

7. Social events for Board Members, employees and involved residents

7.1 EMH Group may provide funding for social events at which Employees and / or Board Members will be attending, such as retirement parties and Christmas parties. Any such funding may be provided up to a limit of £50 per Employee, Board Member or involved resident per event, within a total annual budget of £200 per Employee or Board Member or involved resident.

8. Gifts and hospitality to and from Third Parties

8.1 Introduction

8.1.1 As a registered Association we are in receipt of large quantities of public funding and are responsible for the awarding of a wide array of work contracts, many of which can be of substantial size. The purpose of this policy is to avoid any question that the Group or any of its employees is giving or receiving preferential treatment. A good benchmark to enable you to judge whether any proposed action is appropriate, is to ask yourself whether the Group or the recipient would be embarrassed if the event should become public knowledge. You should never solicit gifts from another individual or organisation.

8.1.2 It is part of general business practice that hospitality is given and received by individuals but the Association must ensure this does not appear to 'influence' its processes. Although we do have clear policy and procedures on the tendering and awarding of contracts, with pre-determined limits and authority, the Association must be mindful of public perception and all its actions must be open to scrutiny.

8.1.3 Although it is not common practice for the Association to entertain, there are occasions when it is deemed appropriate for promotion purposes. The responsibility for deciding action is detailed in the procedure.

8.1.4 Guidelines have been set by Board, on the extent of hospitality that can be given and accepted, the method of reporting; these are laid out in the procedure.

8.2 Received from third parties

8.2.1 Hospitality definition:

The provision of food/drinks (other than light refreshments/buffets) for people who are the guests or customers of an organisation.

8.2.1.1 Hospitality is any event that is attended by an emh group staff member that is paid for by a third party including food/drinks (other than light refreshments/buffets). This is hospitality that needs to be declared.

8.2.1.2 Where you are attending an event for work purposes (awards event) or the group is hosting the table this is not classed as hospitality if the cost is charged to emh group.

8.2.1.3 Where emh group is hosting an event and invites third parties this is hospitality offered by the organisation and needs to be declared

8.2.2 Board Members, involved residents and Employees may, from time to time, receive hospitality and gifts from external organisations. These may include free gifts (e.g. pens, stationery etc) or hospitality such as lunches and invitations to social events etc.

8.2.3 Board Members, involved residents and Employees should generally not receive or offer hospitality and gifts from or to persons or organisations who may be in a position to benefit from actions or decisions taken by EMH Group.

8.2.4 However, there are circumstances where the acceptance of hospitality or gifts is in accordance with established business practice, or where the acceptance of gifts is difficult to avoid without causing offence.

8.2.5 Hospitality should only be accepted by Board Members, involved residents and Employees where:

- (a) it is incidental to the conduct of business or regarded as sustenance; or
- (b) the event is in direct furtherance of EMH Group's business or linked to the sector;
- or
- (c) guests include parties other than Board Members, involved residents and employees.

8.2.6 Board Members, involved residents and Employees should not accept hospitality that is particularly lavish or disproportionate to the occasion. This would include hospitality with an estimated value of more than £75, although in exceptional circumstances this figure may be exceeded with the express approval of the Group Chief Executive, Group Chair or Board. Extreme care should be taken not to compromise the reputation of the Association.

8.2.7 Board Members, involved residents or Employees may not accept gifts or hospitality from organisations with which EMH Group is in dispute or where that organisation is taking part in, or is about to enter into, an active tendering process for a contract with EMH Group.

8.2.8 EMH Group will maintain a register of any gifts and hospitality accepted by Employees, involved residents and Board Members. This register will be reviewed internally once a year, and a report given to the Board on the level of gifts and hospitality received.

8.2.9 All gifts must be declared by the individual who is in receipt of the gift, where the gift is estimated to be in excess of a certain value as set out below:

- Only small personal gifts under £10 (e.g. diaries, calendars, stationery, etc.) may be accepted by an individual without making a declaration.
- All other gifts donated to individuals within the Association with a value between £10 to £50, should be collected by a senior manager within each office, and distributed amongst all staff and they must be declared.
- Board Members, involved residents and Employees should not accept gifts with a value of over £50 under any circumstances.
- Gifts of cash must not be accepted under any circumstances

8.2.10 Personal gifts must not be solicited. Anyone offering gifts should be asked to donate them for the benefit of staff generally. You should never accept anything offered as an inducement i.e. something given as a means of persuading or as an incentive to do something that you would otherwise not have done.

8.2.11 Acceptance of Gifts from Residents

- (i) Staff should not accept gifts of value from residents or potential residents, although birthday cards, or a small gift of a modest value to a member of staff who is leaving, may be accepted. Residents will be made aware that this is our policy via the Residents' Handbook.
- (ii) In the event that a member of staff is named as a beneficiary in a resident's will, this must be declared as soon as it is known. Internal investigations may be made to ensure that there was no possibility that a resident was influenced improperly by the employee.

8.3 **Provided to third parties**

8.3.1 Other than in exceptional circumstances, EMH Group will not provide hospitality or gifts to external organisations, other than:

- hospitality with a value of up to £75 per person per event, such as catering for a lunch meeting;
- or commemorative gifts for a function, with a value not exceeding £10 per gift.

8.3.2 Any hospitality or gifts to be provided to external organisations with a cost to EMH Group of over £75 per person shall be approved by the Executive Management Team and with a cost to EMH Group of over £100 per person shall be approved by the Board.

8.3.3 EMH Group will maintain a register of any gifts and hospitality provided by EMH Group to external organisations. This register will be reviewed internally once a year, and a report given to the Board on the level of gifts and hospitality given.

9. **Housing of Board Members, employees, involved residents and/or others to whom they are closely related**

9.1 EMH Group will only house people in accordance with its published allocations policy.

9.2 Relevant Persons will receive equal treatment to all other applicants in the allocation of housing (including transfer and re-housing applications), and the consideration of an application made by a Relevant Person will be open, fair and transparent.

- 9.3 Any decision to allocate properties, re-house or transfer Board Members or members of the Executive Management Team and/or others to whom they are closely related must be approved by the Chair of the Board, and the interest of that Relevant Person must be disclosed.
- 9.4 Any decision to grant a tenancy or lease to, re-house or transfer Employees (other than members of the Executive Management Team) and/or others to whom they are closely related must be approved by the Group Chief Executive and the interest of that Relevant Person must be disclosed.
- 9.5 – Where the Group grants a tenancy or lease to any Employee, the Group reserves the right, with the permission of the employee, to deduct payment for that tenancy or lease through the employees salary payment. The employee is still required to make a declaration of interest. This declaration may be shared with the relevant Income and HR teams with the employees consent
- 9.6 Any Employee, Involved Resident, or Board Member:
- 9.6.1 with an interest in; or
- 9.6.2 who has a close personal relationship with
- a Relevant Person whose application is being considered under paragraphs 9.2 or 9.3 above will declare that interest and discontinue any involvement they might have in that person's application.
- 9.7 A payment under the Homebuy or Voluntary Purchase Grant Scheme (and any successor schemes) may be made to Board Members, Employees and/or others to whom they are closely related in accordance with EMH Group's published criteria for such schemes.
- 9.8 In order to gain relevant approvals to house those who are closely related to Employees, Involved Residents and Board Members, Tenancy Approval Form, Shared Ownership Approval Form or Contractor Approval Form must be completed and submitted to the Group Chief Executive (and Chair where appropriate) in advance of any decision being made (Appendices 4, 5 and 6). This decision shall then be reported to Board for ratification.
- 10. Provision of care & support to those who are closely related to employees, involved residents and Board Members**
- 10.1 EMH Group will only provide care and support provisions in accordance with its published policies.
- 10.2 Relevant Persons will receive equal treatment to all other applicants in the provision of care and support, and the consideration of an application made by a Relevant Person will be open, fair and transparent.
- 10.3 Any decision to provide care and support to Board Members or Members of the Executive Management Team and/or others to whom they are closely related must be approved by the Chair of the Board, and the interest of that Relevant Person must be disclosed.
- 10.4 Any decisions to provide care and support to Employees (other than members of the Executive Management Team) and/or others to whom they are closely related must be approved by the Group Chief Executive and the interest of that Relevant Person must be disclosed.

10.5 Any Employee, involved resident, or Board Member:

10.5.1 with an interest in; or

10.5.2 who has a close personal relationship with

A Relevant Person whose application is being considered under paragraph 10.2 or 10.3 above, will declare that interest and discontinue any involvement they might have in that person's application

10.6 In order to gain relevant approvals to provide care and support to those who are closely related to Employees, Involved Residents and Board Members, a probity approval form must be completed and submitted to the Group Chief Executive (and Chair where appropriate) in advance of any decision being made. This decision shall then be reported to Board for ratification.

11. Employing those who are closely related to Employees, involved residents and Board Members

11.1 EMH Group will carry out all recruitment processes in a way that is rigorous, transparent and fair.

11.2 EMH Group may offer employment to persons who are closely related to EMH Group's Employees, involved residents or Board Members only where it can be demonstrated they are the best candidate for the role.

11.3 Where this role is for a senior or executive post, the Chair of the Board must first approve that decision. This decision shall then be reported to Board for ratification.

11.4 Extreme care must be taken when an applicant for employment is a close relative of an EMT member or Board Member, in order to ensure that there is no nepotism or valid risk of a perception of nepotism. Any such appointments must be agreed by the Group Chair and Group Chief Executive in advance of any offer of employment being made and then reported to the Board. Where the applicant is a Close Relative of the Group Chief Executive, prior approval must be sought from the Chairman.

11.5 Any Employee, involved resident or Board Member whose Close Relative is applying for a position of employment will not be involved (either directly or indirectly) in the recruitment process for that post.

11.6 Where a close relatives of a current employee is employed within the Group, there must be a clear segregation of role and no direct or indirect line management links between the family members.

11.7 Subject to compliance with paragraph 11.1 above, EMH Group may offer a contract of employment to any former Employee. The Group reserves the right to not offer a contract of employment to any former employee that has received severance or redundancy pay from the organisation

11.8 Any member of staff applying to be on the "relief" list, within 12 months of leaving the organisation, will have to gain relevant approval through probity approval process in advance of any decision being made. There will need to be a minimum of a 1 month gap between leaving employment and joining the "relief" list. This contract will be a zero hour contract.

11.9 The Group will not normally offer a contract of employment/consultancy to any employee who has received severance/redundancy pay from the organisation within the last 12

months. In exceptional circumstances this maybe waived with approval from the Group Chief Executive and the Executive Management Team for employees and the Board of Directors for a member of the Executive Management Team.

- 11.10 Subject to compliance with paragraph 11.1 above, EMH Group may offer a contract of employment to a Board Member, however the Board member must step down from the Board before applying for the position. If the Board Member is successful in his application approval for the contract of employment to be offered must be given by the Group Board.
- 11.11 In order to gain relevant approvals to employ those who are closely related to Employees, Involved Residents and Board Members, the Employment Approval Form (Probity) must be completed and submitted to the Group Chief Executive (and Chair where appropriate) in advance of any decision being made (appendix 3) This decision shall then be reported to Board for ratification.
- 11.10 Approvals are required prior to granting any contract of employment, including temporary positions and work placements.

12. Payments to third parties

- 12.1 EMH Group may not make any payment to a company which is a shareholder or of which a director is a Board Member or a former Board Member or a close relative of a Board Member or former Board Member unless:
 - 12.1.1 that payment is in respect of interest on capital lent to EMH Group or subscribed in its shares; or
 - 12.1.2 that company is a subsidiary or associate of EMH Group.
- 12.2 For any other organisation of which a Relevant Person is a director, EMH Group may only make payments or grant benefits (including contracts for the provision of services or goods) where it can be demonstrated the payment or benefit is in the best interests of EMH Group, following consideration of all other potential contractors.
- 12.3 Any payment or benefit under paragraph 12.2 above must be approved by the Board or Executive Management Team.
- 12.4 A register must be kept of any payment made or benefit given under paragraph 12.2 above, including information as to the Relevant Person and their interest in the company.

13. Other payments

- 13.1 Any payments made or benefits granted to Relevant Persons which are not set out as approved within this policy must be approved by the Board.

Part C: Probity Procedures

This section sets out the mechanical procedures that need to be followed to make sure that EMH Group and each of us as individuals complies with the requirements of Part B of the Probity Policy.

1. Declaring interests

- 1.1 The Probity Policy requires us to declare certain interests at certain times.

1.2 We must each make a general declaration of interests at the point we become Employees / Board Members/involved residents or at such other times as we are requested to do so by the Board or the Company Secretary.

1.3 Any interests we declare will be entered onto a Register of Interests which is maintained by the Governance Manager. Any information you provide to us in your Declarations from time to time will be held and processed in accordance with EMH Group's Data Protection and Information Policy. Subject to this, the Register will be available for inspection by EMH Group's regulator and by people with a legitimate interest in EMH Group and its business from time to time.

1.3.1 Each of us is responsible for making sure our entries in the Register of Interests are kept up to date. From time to time (usually once a year) the Company Secretary will prompt us to check and update our declared interests. However if you become aware at any time that your interests may have changed or you may have acquired new interests that should be declared, it is your responsibility to ensure that this is done. If there is a breach of the Probity Policy in relation to an interest you should have told us about but didn't, we will treat this very seriously.

1.3.2 As well as making sure that our entries on the Register of Interests remain up to date, each of us is responsible for declaring on an individual basis any interests we have in any matter that we are involved in EMH Group's behalf from time to time. For example:

(a) If our role is within the allocations team and someone who is closely related to them applies to be housed, we must declare an interest and not participate in any decision relating to whether that person can be housed;

(b) If our role is as a Board Member and the Board is deciding whether to award a contract to a company where a family member of ours is a director, we must declare an interest and withdraw from any discussions and decision-making in relation to that contract;

(c) If our role is as a member of the Remuneration Committee and our own remuneration is the subject for discussion at a committee meeting, we must declare an interest and withdraw from any discussions and decision-making in relation to our own remuneration.

These examples are not exhaustive and we must remain vigilant to spot any situations where our personal interests could conflict with those of EMH Group.

1.3.3 EMH Group has a separate policy setting out how it expects us to manage conflicts of interests that arise from time to time. We need to make sure we are familiar with this policy and that we follow it whenever a potential conflict situation arises.

1.4 Appendix 2 of this report is a Declaration of Interest Form which must be completed on request in line with this policy, or immediately a new potential conflict of interest arises.

2. Other declarations

2.1 The Probity Policy requires us to declare any hospitality or gifts we are offered or receive from third parties where the value of the hospitality or gift exceeds £10.

2.2 The Probity Policy also requires us to declare any gifts or hospitality offered by or on behalf of EMH Group of any value.

3. Using our discretion

- 3.1 From time to time the Probity Policy requires us to use our discretion as to:
- 3.1.1 whether we need to declare an interest;
 - 3.1.2 whether an interest that has been declared by someone else is relevant;
 - 3.1.3 (where a particular decision is delegated to us to make) whether a particular payment or benefit or other matter covered by the Probity Policy should be permitted or not.
- 3.2 Whenever matters are left to our discretion, we need to weigh up the right decision very carefully to make sure we don't breach the Probity Policy or put EMH Group in a difficult situation.
- 3.3 In those circumstances it is helpful to refer to the six main principles of the NHF Code of Conduct 2012 which are:
- Probity
 - Loyalty and conflict of interest
 - Remuneration
 - Personal benefit
 - Prevention of bribery and corruption
 - Respect

We will bear these principles in mind whenever we are called upon to consider or make decisions on any matter that relates to this Probity Policy, whether in our own capacity or that of an Employee, involved resident or Board Member to whom a decision is delegated.

- 3.4 If we need help or support making a decision about anything to do with this Policy, we should speak with:
- 3.4.1 Our line manager (if we are an Employee);
 - 3.4.2 The Company Secretary or Governance Manager (if we are a Board Member or involved resident); or
 - 3.4.3 The Chair of the Board (if we are a Board Member).

They will be happy to talk to us in confidence and advise us on the right course of action.

- 3.5 Appendix 1 of this report is a Hospitality and Gifts Declarations Form. This must be completed and returned to the Governance Team within 14 days of receiving declarable gifts and/or hospitality in line with the policy. Where gifts and/or hospitality require approval, the form should be completed and approved prior to acceptance of the gift/hospitality.

4. Delegations

- 4.1 Where the Board delegates authority to a committee to make decisions about any matter contained within this Probity Policy from time to time, it must ensure that such delegation is clear and the committee is of an appropriate size and formality in terms of meetings and record-keeping.
- 4.2 In order to avoid unnecessary delays, approvals of the granting of contracts of employment, and the allocations of housing is granted to the Company Secretary and Group Chief Executive. Use of this delegated authority shall be reported to the next Board meeting for ratification.

5. Breaches of the Probity Policy

- 5.1 Any alleged breach of the Probity Policy will be investigated by EMH Group.
- 5.2 A breach of the Probity Policy by an Employee will be treated as a disciplinary matter under his or her contract of employment and an appropriate sanction may be applied. An investigation into any allegation of such a breach made against an Employee will be conducted in accordance with EMH Group's relevant policies for such investigations.
- 5.3 A breach of the Probity Policy by a Board Member will be treated as a breach of his or her duties and obligations to EMH Group and his or her services agreement with EMH Group. An investigation into any allegation of such a breach made against a Board Member will be conducted in accordance with EMH Group's relevant policies for such investigations and an appropriate sanction may be applied.
- 5.4 A breach of the Probity Policy by an Involved Resident shall be treated as a breach of their Code of Conduct and, following appropriate investigations and confirmations, sanctions applied in line with this Code.

6. Supporting Documentation

- 6.1 The following appendices support the application of this policy:
 - 6.1 Appendix 1 - HOSPITALITY AND GIFTS DECLARATION FORM
 - 6.2 Appendix 2 – DECLARATIONS OF INTEREST FORM
 - 6.3 Appendix 3 – EMPLOYMENT APPROVAL/ TENANCY APPROVAL/ SHARED OWNERSHIP/ CONTRACTOR APPROVAL FORM (PROBITY)

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19 April 2010

Revised May 2017 – Kayleigh Hall, Governance Manager

Approved by EMH Group Board XXXXXXXX

Joanne Tilley, Executive Director Corporate Services



HOSPITALITY AND GIFTS DECLARATION FORM
 (To be completed for hospitality / gifts accepted, declined or given)

Name:	
Job Title:	
Work Location:	
Details of hospitality:	
Date of function / engagement:	
Approximate value:	
Accepted or declined:	
Any further details (e.g. gift accepted but passed on for raffling, justification for accepting hospitality, etc)	
Prior approval required: (above £50)	Yes / No

Employee / Board Member / Involved Resident signature:

Manager's signature (if required) to accept hospitality / gift(s):



Please read the accompanying notes before completing the form to ensure an accurate declaration is made.

Name:

Position:

Home Address.....
.....

Group definition - All properties/care provided by emh homes, emh care & homes support, Midlands Rural Housing and Sharpes Garden Services.

Please answer those questions which apply to you, close family members, or close friends and acquaintances. Some questions apply to you alone, while others apply to people you know and how they may be involved. If you answer “No”, please move on to the next question. If you answer “Yes” please give further details in the box overleaf. If there is insufficient room please continue on a separate sheet which is to be signed and dated and attached to this form.

	YES	NO
Are you or do you have a relative who is an owner or a director concerned with the management of a company which the Group does business with or makes payments to? (please see Group definition above)		
Do you live in one of the Group’s properties? (please see Group definition above) Please note – the information regarding this will be shared with the Income Team and HR Team in accordance with section 9.5 of the Probity Policy		
Do you have any relatives that live in one of the Group’s properties or receive care or support service from the Group? (please see Group definition above)		
Are you related to, or co-habiting with anyone who is currently, or has been within the last 12 months: A. Board Member B. Member of Staff		
Do you, a relative or member of your household have the potential to enter into a contractual obligation with the Group?		
Do you or a relative or member of your household, have an existing link between the Group and another housing/care related organisation including relatives who have a contract of employment?		
The Group uses a number of contractors and suppliers. From those you are aware of, do you use any contractor or supplier in a personal capacity?		

DECLARATIONS

Question Number	Details <i>Please provide names, job title and work location if applicable.</i>
1.	
2.	
3.	
4.	
5.	
6.	
7.	

Please note that if you declare that you or one of your relatives live in a “group” property, we will share your details with the income team, so that sensitivities in managing the tenancy can be handled in an appropriate manner by our colleagues.

The National Housing Federation Code of Conduct requires that you should be meticulous about declaring any dualities or conflicts of interest. Is there anything you have not already mentioned that the Group should be aware of?

Write YES or NO If yes give details

.....

I certify that the above answers and details are, to the best of my knowledge, true. I will advise my Line Manager or Head of Department should I become aware of any changes to my declaration.

I understand that it is my responsibility to notify them of any change of circumstance within the year.

SIGNED **DATE**

All employees and officers are requested to return this declaration. Failure to do so will result in an internal investigation which may lead to further action. Your co-operation is appreciated.

The information contained on this form is private and confidential and information will only be shared with the relevant individual(s), if further action is required e.g. your line manager.

NOTES TO ASSIST IN THE COMPLETION OF YOUR DECLARATION OF INTEREST FORM

Please complete **ALL** sections.

Question 1 – Are you or do you have a relative who is an owner or a director concerned with the management of a company which the Group does business with or makes payments to?

If you or one of your relatives have any connection or hold any post with a company or practice the Group does business with you must declare it.

Question 2/3/4 - Do you live in one of the Group's properties/ Do you have any relatives that live in one of the Group's properties or receive care or support service from the Group and Are you related to, or co-habiting with anyone who is currently, or has been within the last 12 months:

A. Board Member

B. Member of Staff

If you or one of your relatives have any connection or hold any post with a company or practice the Group does business with you must declare it.

You must declare any tenancies; leases, employment contracts (permanent and temporary) or other contractual relationships that you know exist between yourself or your relative and the association. These will be subject to a Schedule 1 exemption and must have followed the separate procedure.

Current applications for tenancies or sales in progress must be included.

Please note that if you live with a member of staff or are in a serious relationship with a member of staff this needs to be declared.

Details of relationships requested to disclose include:

➤ Husband	➤ Parent
➤ Wife	➤ Grandparent
➤ Partner	➤ Brother/sister
➤ Cohabitee	➤ Son/daughter
➤ Step relationships	➤ Grandson/granddaughter

Question 5 & 6 – Contractual Relationships/ Housing and care-related organisations

For example a relative/spouse that works for one of our contractors.

This question is seeking to identify any wider relationships that you or your relatives have within the Housing field.

Membership of housing organisations

This means where an individual is a member or associated with an outside organisation that is housing-related. This should cover all organisations with a housing link and those directly connected to the Association.

e.g. A Board member of another housing organisation must be declared.

A school governor need not be declared.

A member or an employee of a local authority must declare.

If you are a Councillor this must be declared.

Question 7 - Use of Contractors and Consultants

*Using the services of any contractors or consultants that you know work for the Association is **permitted**. You will only have to declare an interest if, in your role, you might be able to influence the allocation of work to a contractor.*

If there is uncertainty about the relevance of declaring a relationship, you are advised to seek clarification from your Line Manager or the Assistant Company Secretary. If this is not possible it is recommended that the relationship be declared and you will be informed of the necessity to continue with the declaration at a later date.

If you are aware of any changes in the pipeline, you are obligated to bring them to the attention of your line manager as soon as possible.

This declaration will be reissued annually in April. Any change of circumstances during the year must be notified to your line manager.

EAST MIDLANDS HOUSING GROUP LIMITED PROBITY FORM

REQUEST FOR APPROVAL BY GROUP BOARD, SUBSIDIARY BOARDS, OR GROUP CHIEF EXECUTIVE FOR AN INDIVIDUAL* ASSOCIATED WITH EMH GROUP OR ITS SUBSIDIARIES FOR THE GRANTING OF:

1. A TENANCY AGREEMENT
2. A COMMERCIAL CONTRACT
3. A HOMEBUY/SHARED OWNERSHIP/AFFORDABLE HOUSING PURCHASE
4. A CONTRACT OF EMPLOYMENT

* An individual includes:

- a board member (including a co-opted board member)
- a relative of the Executive Management Team
- a relative of a current employee
- an officer
- a prospective employee
- a current employee
- an involved resident

PLEASE TICK THE RELEVANT APPROVAL REQUIREMENT:

A Tenancy Agreement – (section 2)	<input type="checkbox"/>
A commercial contract – (section 3)	<input type="checkbox"/>
Granting of Homebuy/shared ownership/affordable housing purchase – (section 4)	<input type="checkbox"/>
A contract of employment – (section 5)	<input type="checkbox"/>

ALL APPLICANTS SHOULD COMPLETE SECTION 1 AND THE RELEVANT SUPPORTING SECTION.

SECTION 1 - TO BE COMPLETED BY ALL APPLICANTS

Please cross out the information that is not relevant

Name of Board Member/Current Employee/Prospective Employee/ Involved Resident :	
Position Held/Position Applied For :	
Location:	
Position Previously Held (if applicable):	
Relationship to Board Member/Current Employee:	
If applicable - please declare the name, job title and location of Board Member/Current Employee:	
Approval to be granted:	

SECTION 2 - ONLY TO BE COMPLETED FOR A TENANCY AGREEMENT

Criteria for Section – Has the Group’s Housing Policy been followed? If not, why not?	
CBL nomination?	
Was the Board Member/Employee/Involved resident involved in the process?	
Did the Board Member/Employee/Involved Resident/Relative register for accommodation on the Local Authority Register?	
Has the Local Authority provided the name of the Board Member/Employee/Involved Resident/Relative as a priority bidder?	
If the Board Member/Employee/Involved Resident/Relative was not first name, why have they been offered the property instead of the other bidding applicants?	

Any further background information that would be useful in relation to the above.	
---	--

Please attach copies of supporting evidence to the form.

SECTION 3 – ONLY TO BE COMPLETED FOR A COMMERCIAL CONTRACT

Have all personal interests been declared?	
Has the contract been put out to tender? If so who were the other tenderers?	
What are the sums involved?	
Is the transaction in the best interest of the Group?	
Has the Board Member/Employee/Involved Resident been removed from the decision-making process?	

Please attach copies of supporting evidence to the form.

SECTION 4 – ONLY TO BE COMPLETED FOR GRANTING OF HOMEBUY/SHARED OWNERSHIP/AFFORDABLE HOUSING PURCHASE

Does the applicant fulfil all the criteria?	
Has the Group full and fair process for recruitment and selection been followed?	
Was the Board Member/Employee/Involved Resident involved in the recruitment and selection process?	

Please attach copies of supporting evidence to the form.

**SECTION 5 – ONLY TO BE COMPLETED FOR A CONTRACT OF EMPLOYMENT
(PERMANENT/TEMPORARY/RELIEF)**

What steps has the organisation taken to conduct a full and fair process for competitive recruitment and selection – please confirm:	
Who is the Recruiting Manager?	
Who were the other panel members?	
The date of interview:	
The interview score/assessment:	
Is it the panel decision that the prospective employee is: <ul style="list-style-type: none"> - Appointable? - The preferred candidate? 	Yes/No Yes/No
If they are not the preferred candidate please explain why?	
Was the related Board Member/ Current Employee/ Involved Resident involved in the recruitment and selection process?	Yes/No
If the prospective employee has previously been employed by the organisation then please confirm: <ul style="list-style-type: none"> - Dates of employment - Job Title - Organisation employed in - Reason for leaving 	
Anticipated start date of employment?	

Please attach copies of supporting evidence to the form.

Please delete as appropriate:

- We certify that all reasonable checks have been carried out to ensure that the allocation of accommodation is in accordance with our published allocations policy.
- We certify that all reasonable checks have been carried out to ensure that the offer of a commercial contract is in accordance with our procurement policy.
- We certify that all reasonable checks have been carried out to ensure that the shared ownership/affordable purchase is in accordance with our published affordable housing selection policy.
- We certify that all reasonable checks have been carried out to ensure that the offer of a contract of employment follows the Group's recruitment and selection policy.

Name:

Signed..... Date.....
Job Title – HR Manager

Name:

Signed..... Date.....
Job Title – Head of HR and L&D [where applicable]

Name:

Signed..... Date.....
Job Title – Housing Manager [where applicable]

Name:

Signed..... Date.....
Job Title - Executive Director

Name:

Signed..... Date.....
Company Secretary

Approval - Granted / Not Granted* [delete as appropriate]

Name:.....

Signed..... Date.....
Job Title - Chief Executive

Name:.....

Signed..... Date.....
Group Chair (if employing a relative of an EMT Member)

DECLARATIONS OF INTEREST & PROBITY FORM PROFORMA - RISKS & MITIGATING FACTORS

If an employee or prospective employee has declared one of the following, the Recruiting Manager or Line Manager will be required to complete the below proforma to evidence that all risks have been identified and that there are appropriate controls in place:

1. Relatives currently work for the organisation
2. Relatives live in our properties
3. They have declared a relationship with a director of one of our contractors
4. A relative is purchasing a shared ownership property through hello homes
5. A relative has been awarded an emh property through the Choice-based lettings.

Prospective Employee Details:

Name :
Job Title:
Location:

RISK	MITIGATING FACTORS IN PLACE	ACTIONS (IF REQUIRED)
<p><i>Eg. 1. A prospective or current employee will have a relative who lives in our property. Will they be able to access their rent accounts? Will they be able to assign repairs to that property?</i></p> <p><i>Eg. 2. A prospective employee has a relative who currently works for us. What is the name of their relative? What is their job title and location? Will they be working with their relative? Who will be their line manager? How will requests for absence be managed if needed at the same time?</i></p>	<p><i>They will not be able to access the rent accounts or assign repairs to that property. The relative will be required to be put through to another member of the team</i></p> <p><i>They will not be in the same team as their relative/they will be working at a different property. They will not be line managed by their relative Absence requests have been discussed with prospective employee</i></p>	

Form Completed by:

Name & Job Title:
Date:

Please return this completed form to the HR Department. Any delay in returning this form could delay any formal offer of employment.