

A meeting of the Management Committee will take place on **Saturday 25 November 2023 at 9.30am** at **Carberry Tower, Musselburgh**

Please advise staff if you are unable to attend.

**Joyce Bolan**  
**Secretary**

## **B U S I N E S S**

### **1.0 GENERAL**

- 1.1 Apologies
- 1.2 Declaration of Interest by Management Committee Members
- 1.3 Minutes of 28 September 2023 – **for approval**
- 1.4 Action List – for information
- 1.5 Matters Arising

### **2.0 GOVERNANCE**

- 2.1 Secretary's Report – for information
- 2.2 Management Committee Calendar 2024/25 – **for approval**
- 2.3 Key Performance Indicators 2023/24 – for information

### **3.0 PRIORITY ITEMS**

- 3.1 Independent Review of ELHA Performance – for information

### **4.0 POLICIES**

- 4.1 Banking Policy Review – **for approval**
- 4.2 Provision of Agency Services Review – **for approval**
- 4.3 HR Equality & Diversity Policy – **for approval**

### **5.0 BUSINESS MANAGEMENT**

### **6.0 ANY OTHER BUSINESS**

### **DATE OF NEXT MANAGEMENT COMMITTEE MEETING**

**Thursday 22 February 2024** at ELHA Head Office, Haddington, at 7.00pm

## Action List

### Report by Martin Pollhammer, Chief Executive – for information

The table below sets out the required actions agreed at the last meeting of the Management Committee on 28 September 2023, and confirms the actions taken.

Minute Ref	Action Required	Action By	Action Taken
AGM	Update the SHR Portal with Management Committee changes	ES	Complete
1.1	Arrange new Management Committee member induction process with Graham Rattray	ES	Majority complete but meeting with Gary Alison to be arranged
1.3	Publish the minutes and papers on elha.com	ES	Complete
2.1	Update the SHR Portal with Office Bearer details	ES	Complete
2.2	Advise the SFHA of the Representative Member details	ES	Complete
2.2	Advise EVH of the Representative Member details	ES	Complete
2.2	Confirm R3 Board appointments to Companies House	GA	Complete
2.2	Confirm changes in Management Committee to lenders	GA	Complete
2.3	Ensure all Management Committee members have completed and returned the Code of Conduct Signing Page, Declaration of Interests Form and Eligibility for Membership Form	ES	Complete
4.1	Update the Mutual Repair Policy with the minuted amendments, then add to the ELHA File Structure, elha.com and update the Policy Review Timetable	ES	Complete
4.1	Review advice from Anderson Strathern on the management of hard landscaped areas in which the Association has a common interest	KB	Complete
4.2	Update the Rent & Service Charge Policy on the ELHA File Structure, elha.com and update the Policy Review Timetable	ES	Complete
4.3	Update the Attendance & Absence Management Policy with the minuted amendment, then add to the ELHA File Structure, elha.com and update the Policy Review Timetable	ES	Complete

## Secretary's Report – for approval

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### 1.0 Membership

No new applications for membership have been received.

Two memberships have been cancelled

- [REDACTED] – deceased
- [REDACTED] – requested termination of membership

### 2.0 Use of Seal for Homologation

No use has been made of the seal.

#### **Recommendation**

The Management Committee is asked to approve the cancellation of the Memberships noted at Section 1.0.

## Management Committee Calendar 2024/25

### Report by Martin Pollhammer, Chief Executive – for information

Management Committee dates for 2024/25 are as follows (dates in 2024 are confirmed, dates in 2025 are provisional):

Date	Meeting Time	Venue
<b>2024</b>		
22 February 2024	7.00pm to 9.00pm	ELHA Conference Room
21 March 2024	7.00pm to 9.00pm	ELHA Conference Room
30 May 2024	7.00pm to 9.00pm	ELHA Conference Room
22 August 2024	7.00pm to 9.00pm	ELHA Conference Room
26 September 2024 (AGM)	2.00pm to 3.30pm	Maitlandfield Hotel, Haddington
26 September 2024	4.00pm to 6.00pm	Maitlandfield Hotel, Haddington
23 November 2024	9.30am to 11.00am	To be confirmed
<b>2025</b>		
20 February 2025	7.00pm to 9.00pm	ELHA Conference Room
20 March 2025	7.00pm to 9.00pm	ELHA Conference Room
22 May 2025	7.00pm to 9.00pm	ELHA Conference Room
21 August 2025	7.00pm to 9.00pm	ELHA Conference Room
25 September 2025 (AGM)	2.00pm to 3.30pm	Maitlandfield Hotel, Haddington
25 September 2025	4.00pm to 6.00pm	Maitlandfield Hotel, Haddington
22 November 2025	9.30am to 11.00am	To be confirmed

# Key Performance Indicators 2023/24

## Report by Martin Pollhammer, Chief Executive – for Information

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### 1.0 Introduction

The Association's Key Performance Indicators (KPI's) for the second quarter of 2023/24 and full year are attached as **Appendix 1** to this report.

### 2.0 ELHA Performance

The Association has missed the following targets:

#### 2.1 Unit Reactive Maintenance Costs

This represents an overspend of £52k to the end of Quarter Two, which is 8.9% of budgeted void and reactive maintenance costs. There have been impacts on the profiling of the budgeted spends throughout the year, but these costs are likely to be overspent to the end of the year. This will continue to be monitored and the findings reported to the Audit & Assurance meetings.

#### 2.2 Bronze Key Tenants

Bronze Key Tenants have remained the same this quarter and continue to sit well ahead of target at 48%. Staff continue to encourage those at Bronze Key Tenant level to upgrade to Gold Key Tenant status at every opportunity.

#### 2.3 Gold Key Tenants

The percentage of Gold Key Tenants has dropped slightly and continues to remain well under target. The Rent Increase Consultation process will be used to promote upgrades in the New Year.

#### 2.4 Management Committee Attendance

This is below target, as there has been a consistent level of apologies (four of the thirteen Management Committee members) at each of the three meetings held so far this year. A better attendance level is expected at the November 2023 meeting, but it is not clear if this will be sufficient to bring the Year to Date figure back in line with target.

#### 2.5 Audit & Assurance Committee Attendance

This is also slightly below target for Quarter 2 (although on target for Year to Date) as there were three apologies out of eight attendees at the August 2023 meeting. A better attendance is expected for the November 2023 meeting.

**2.6 Percentage of Tenants Using Their My Home Account**

The number of tenants using their My Home account remains at 89%, just below target by 1%. It is anticipated that this target will be achieved during the year.

**2.7 Percentage of Tenants Paper-Free**

The number of paper-free tenants also remains the same and sits just 2% under target at 85%. It is hoped that the target will be achieved by year end.

**2.8 Percentage of Complaints Responded to within Target**

All complaints were responded to within target during the quarter however, the Year to Date figure will remain out of target for the remainder of 2023/34. This is due to two Stage Two complaints being logged incorrectly during the last quarter resulting in responses being one day out with target.

Key Performance Indicators 2023/24

Performance Indicator	Quarterly Target	Q1	Q2	Q3	Q4	2023/24 Target	2022/23 Actual	Year to Date	Status
<b>Rental Income</b>									
Non-technical arrears as % of rental income	2.8%	2.84%	2.76%			2.8%	2.78%	2.76%	😊
Bad debts written off as % rental income	1.50%	1.18%	1.17%			1.50%	1.35%	1.17%	😊
Voids as % of rental income	0.75%	0.67%	0.53%			0.75%	0.63%	0.53%	😊
<b>Finance/Treasury</b>									
Interest cover (loan covenants)	110%	236%	211%			110%	262%	211%	😊
Gearing (loan covenants FRS102 definition)	<37%	23%	22%			<37%	22%	22%	😊
Maximum annual new borrowing	<£3m	£800k	£800k			<£3m	£280k	£800k	😊
Maximum borrowing per unit	<£26,000	£16.2k	£16.0k			<£26,000	£15.8k	£16.0k	😊
Current assets as a % of current liabilities	100%	146%	202%			100%	126%	202%	😊
Cash as a % of net rental and service charge income	>20%	29%	60%			>20%	34%	60%	😊
Unit management costs	£2,006	£1,882	£1,906			£2,006	£1,701	£1,906	😊
Unit reactive maintenance costs	£823	£843	£888			£823	£938	£888	😞
<b>Asset Management</b>									
Stock condition inspections completed	cumulative	30%	30%			30%	30%	30%	😊
Gas services completed within timescale	cumulative	100%	100%			100%	100%	100%	😊
Planned maintenance contracts with >5% overspend	0	0	0			0	0	0	😊
Average length of time taken to complete emergency repairs	<2 hours	01:18:30	01:14:20			<2 hours	01:15:12	01:16:25	😊
Average length of time taken to complete non-emergency repairs	< 6 days	5.26	5.76			< 6 days	4.73	5.51	😊
Repairs completed right first time	85%	96%	96%			85%	94%	96%	😊
Repair appointments kept	93%	97%	97%			93%	98%	97%	😊
<b>Housing Management</b>									
Properties allocated after 3 or more refusals	0	0	0			0	0	0	😊
Number of evictions carried out	no target	0	1			no target	0	1	😊
Bronze Key Tenants	40%	48%	48%			40%	46%	48%	😞
Gold Key Tenants	27%	19%	18%			27%	15.0%	18%	😞
Platinum Key Tenants	20%	19%	20%			20%	23.4%	20%	😊
<b>Corporate</b>									
Number of accidents reportable to HSE	0	0	0			0	1	0	😊
Network Availability	99%	99%	100%			99%	99%	99%	😊
% working days lost through long term sick leave	5%	0.0%	0.0%			5%	1.7%	0.0%	😊
% working days lost through short term sick leave	2%	1.1%	1.1%			2%	1.9%	1.1%	😊
Management Committee attendance	75%	69%	69%			75%	87%	69%	😞
Audit & Assurance Committee attendance	75%	88%	63%			75%	73%	75%	😞
% of tenants using their My Home account	90%	89%	89%			80%	88%	89%	😞
% of tenants paper-free	87%	85%	85%			70%	85%	85%	😞
% of tenants with a connected Rent Collector account	30%	29%	31%			30%	n/a	31%	😊
% of complaints responded to within target	100%	94%	100%			100%	99%	97%	😞

😊 Performance Excellent    😞 Performance Satisfactory    😞 Performance Poor

# Independent Review of ELHA Performance

## Report by Linda Ewart – for Information

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### 1.0 Introduction

Following discussion by the Management Committee, the performance review for 2021/22 introduced a new set of benchmarking comparisons to provide a 'benchmarking group' that is more relevant to elha, its tenant profile and operating environment. The data is presented in a similar format to previous years, to aid the committee's consideration and, as before, the year-on-year comparison period is three years. elha's performance is compared over the period and then compared with the 'neighbours', the 'peers' and the Scottish average, as before. It must be remembered that only direct comparisons can be made between 2022 and 2023 because the comparison groups were re-configured between 2021 and 2022.

The composition of the peer groups' composition is shown below; data from East Lothian Council is presented separately. The data presented in this report builds on that presented for the first time in 2022 and is intended to help to support the Management Committee's consideration of trends and comparisons.

The following table shows the total number of units managed by each landlord<sup>1</sup>

<b>Neighbours</b>	<b>Total Owned and Managed (at 31/3/23)</b>
elha	1,345
Berwickshire	1,939
Places for People Scotland (PFPS)	7,771
Manor Estates (MEHA)	1,014
Melville	2,090
East Lothian Council	9,107
<b>Peer Group</b>	
Angus	2,113
Eildon	2,806
Loreburn	2,496
Osprey	1,748
Waverley	1,451

### 2.0 National Trends

The 2022/23 national report on the Charter reported that, in very challenging circumstances, performance has been maintained or improved in six out of the thirteen outcomes, whilst performance has declined (marginally, for the most part) against the remaining seven.

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<sup>1</sup> Scottish Housing Regulator (SHR) Annual Return on the Charter (ARC) data 2022/23  
3.1 Independent Review of ELHA Performance 2022/23



Almost 9 out of 10 tenants are satisfied with the homes and services provided by their landlord, but a slight fall in satisfaction levels have been reported including:

- Tenants’ overall satisfaction with the quality of their home has declined slightly, to 84%; a similar level of satisfaction is recorded in relation to the landlord’s management of the neighbourhood
- Agreement that rent provides value for money fell slightly to 82% (rents increased by an average of 5.1%)
- Resolution of ASB complaints fell slightly (to 94%), as did response rates to Stage 1 complaints (now 95%), although both obviously remain high

These results reflect the trend that has been identified since 2020. It must be noted that the timing of data collection about tenant satisfaction for the peer groups is not consistent: some is more recent / up-to-date than others because of the different timescales and frequencies adopted by the various landlords, but all landlords have carried out a tenant satisfaction survey since 2019/20.

The table below shows the trends in performance against the ARC in 2022/23:

<b>Improved</b>	<b>Maintained</b>	<b>Declined</b>
Quality of housing	Tenancy sustainment	Rents & service charges
Services for gypsies & travellers	Estate management, ASB, tenancy and neighbour nuisance disputes	Value for money
	Repairs, maintenance & improvements	Participation
	Equalities	Communication
		Homelessness
		Access to social housing
		Housing options

**3.0 Tenant Satisfaction**

elha’s last tenant satisfaction survey was carried out in 2022 (reported February 2023): it reported that elha’s performance had, in the main, been maintained when compared against the 2019 results, although a decline in repairs satisfaction was noted: this was attributed to the ongoing impact of the pandemic. Satisfaction with the overall service fell slightly, in keeping with post-pandemic sector trends, but elha’s performance remains almost 4% above the Scottish average (compared to 4% below in 2019 and 6.5% above in 2022).

Table 1	Quality of service overall	Good at keeping informed about service & outcomes	Satisfied with opportunities to participate in decision making
elha 2023	90.5%	96.4%	96.8%
elha 2022	94.5%	97.7%	92.3%
elha 2021	94.5%	97.7%	92.3%
Scottish Av. 2023	86.7%	89.7%	85.9%
Scottish Av. 2022	88%	91%	87%
Scottish Av. 2021	89%	91.7%	86.6%

### 3.1 Tenant Satisfaction Comparison

Table 2 draws together the comparisons between elha, the Scottish average and the averages of the two benchmarking groups. As this is the second year of comparing elha’s performance against the revised peer groups, comparative data for 2022 is presented alongside this year’s results. As before, the Scottish averages are broadly comparable to the previous year, although the downward trend continues which means that, over the three years since 2021, the Scottish average for overall satisfaction has fallen by just over 2%. By comparison, elha’s overall satisfaction level fell by 4% over the same period.

The ‘neighbours’ record slight declines against two of the three indicators and maintain performance in respect of opportunities to participate where a decline of almost -5% was recorded between 2021 and 2022. It must be noted, however, that the group is composed slightly differently because of the removal of ELC and the substitution of Berwickshire, where satisfaction levels continue to be lower than the other RSLs in the group (particularly in respect of opportunities to participate in decision-making).

Against each of the three satisfaction indicators, elha continues to out-perform against the Scottish, peer group and neighbours’ averages and ELC. For quality of service, elha is now 7% ahead of the neighbours (9.5% in 2022); for provision of information, elha’s performance is 6.9% better compared to the neighbours (7.2% in 2022).

For opportunities to participate in decision-making, elha is 9.7% ahead of the neighbours (compared to 4.9% in 2022). It must be acknowledged, however, that this substantial margin is largely attributable to the relatively poorer performance of Berwickshire in comparison to the other neighbours (especially in respect of opportunities to participate in decision-making where BHA’s satisfaction level is 68.1%). elha also performs significantly better against all three indicators when compared with the peer group.

When compared against ELC, elha’s performance is markedly better (+9% for overall service; +16% for opportunities to participate in decision-making). The 2019 TSS results demonstrated that elha’s performance had improved to become more closely aligned with all of the comparison groups<sup>2</sup>: in 2022, it is significantly better against all of comparisons against these three indicators. elha’s recent TSS confirms that the significant improvements recorded in 2019 has been maintained and not unduly impacted by the relative negativity that has been apparent in post-pandemic sector results.

Table 2	Quality of service overall		Good at keeping informed about service & outcomes		Satisfied with opportunities to participate in decision making	
	2022	2023	2022	2023	2022	2023
elha	94.5%	90.5%	97.7%	96.4%	92.3%	96.8%
Scottish Average	88%	86.7%	91.2%	89.7%	86.8%	85.9%
Neighbours’ Average	85%	83.1%	90.5%	89.5%	87.4%	87.1%
Peer Group Average	86.3%	85.5%	90.5%	87%	83.6%	81.2%
East Lothian Council	84.3%	81.6%	88.6%	86%	85.3%	80.2%

#### 4.0 Quality and Maintenance

Table 3 contains information for elha based on the 2023 ARC, together with the Scottish averages for the same period, and Table 4 compares elha with the neighbours, peer group and ELC.

elha has restored compliance with SHQS to above average levels, following the implementation of a post-pandemic catch-up programme to renew EICRs in 2022/23: 93.6% compliance has been achieved (+50% compared to 2022) compared to the Scottish average of 79%. A number of landlords continue to face challenges in respect of EICRs, mainly because of labour shortages.

elha’s performance in respect of emergency repairs times has been maintained and remains significantly better than the Scottish average (1.3 hours compared to 4.2). elha’s non-emergency repairs response times have improved significantly (from 7.6 days to 4.7 days, meaning that performance is now better than in 2021 and in line with pre-pandemic standards. The national average has remained broadly static at 8.7.

<sup>2</sup> Performance had compared less favourably in previous years  
 3.1 Independent Review of ELHA Performance 2022/23

elha’s performance in completing repairs ‘right first time’ has continued to improve and is now 94.2% and is now only 1% behind the 2020 level. The ‘gap’ between elha’s performance and the national average has widened and is now +c6% (+c3% in 2022): the national average has continued to decline, although much less markedly.

Overall satisfaction with elha’s repairs service has remained static and continues to be weaker than in 2020 (by almost 9%): it remains poorer than the Scottish average which has also remained static.

Table 3 Landlord	Meet SHQS	Av hrs for emerg. repair	Av days for non-emerg. repair	% reactive complete right 1 <sup>st</sup> time	% tenants satisfied with service
elha ‘23	93.6%	1.3	4.7	94.2%	84.6%
elha ‘22	43.6%	1.1	7.6	91.5%	84.5%
elha ‘21	97.2%	1.5	5.7	90.9%	84.9%
S AV ‘23	79%	4.2	8.7	87.8%	88%
S AV ‘22	73%	4.2	8.9	88.3%	88%
S Av ‘21	91%	4.2	6.7	91.5%	90.1%

#### 4.1 Quality and Maintenance Comparison

Table 4 looks at the same indicators as Table 3 but with additional comparisons to provide a broader picture, encompassing the neighbours and peer groups and, separately, ELC. elha’s performance is better against all the comparators for four of the five indicators.

SHQS compliance has increased for each of the comparisons: the Scottish average has increased by 6% (to 79%) but is still significantly below the 2020 level of 94%; the neighbours’ is still 12% behind the 2020 level (this average continues to be influenced by Berwickshire’s low (but improved) level of compliance of 58%); the peer group average is 88.6% (+10%) and ELC’s compliance is 86.9%.

Average emergency repairs response times have remained broadly static compared to 2022 across all of the comparison groups. elha’s performance is in line with pre-pandemic results, and remains around 3 hours’ hours better than the Scottish average (and almost +5 hours faster than the neighbours).

For non-emergency repairs, elha’s performance improved considerably (reducing by almost 3 days) and is now better than in 2020 and significantly ahead of each of the other comparisons.

In respect of ‘right first time’, elha has improved from last year and is now much closer to the 2020 position; elha’s performance is comparable to that of the peer group, performs better than the Scottish average and is ahead of the neighbours and ELC.

Although elha’s overall satisfaction with the repairs service has been maintained it remains below the Scottish average and is 9% behind its own 2020 level. elha’s levels of overall satisfaction are slightly better than the neighbours, but poorer than the other comparison groups.

Table 4	Meet SHQS	Av hrs for emerg. repair	Av days for non-emerg. repair	% reactive complete right 1 <sup>st</sup> time	% tenants satisfied with repairs service
elha ‘23	93.6%	1.3	4.7	94.2%	84.6%
elha ‘22	43.6%	1.1	7.6	91.5%	84.5%
elha ‘21	97.2%	1.5	5.7	90.9%	84.9%
S AV ‘23	79%	4.2	8.7	87.8%	88%
S Av ‘22	73%	4.2	8.9	88.3%	88%
S Av ‘21	91%	4.2	6.7	91.5%	90.1%
N AV ‘23	77%	6.1	11.7	82.5%	82.4%
N Av ‘22	66.3%	5.3	9.9	89.3%	82.1%
N Av ‘21	89.5%	4.8	7.1	91.2%	83.5%
P Av ‘23	88.6%	2.2	8.5	93.3%	94.1%
P Av ‘22	78.6%	2.1	9.2	92%	91.9%
P Av ‘21	91.8%	4.7	7.7	87.7%	84.2%
ELC ‘23	86.9%	3.9	9.2	92.4%	88%
ELC ‘22	63.1%	3.9	9.8	90.8%	90.4%
ELC ‘21	97.6%	4.3	8.2	94.2%	86.4%

(S Av = Scottish average; N Av = neighbours’ average; P AV = peers’ average; ELC = East Lothian Council).

### 5.0 Neighbourhoods - ELHA

elha has broadly maintained its performance in resolving ASB complaints during 2023: performance is equivalent to 2020 – but it is 2% behind the 2021 outcome. elha’s performance is c2.5% better than the current Scottish average.

Table 5	% resolved within local targets
elha 2023	<b>96.5%</b>
elha 2022	<b>97.5%</b>
elha 2021	<b>98.7%</b>
Scottish Av 2023	94.2%
Scottish Av 2022	94.7%
Scottish Av 2021	94.4%

### 5.1 Neighbourhoods Comparison

elha’s performance<sup>3</sup> has been maintained in the last year and continues to exceed each of the other comparisons: it is 4% better than the neighbours; 9% better than the peer group and 23% better than ELC).

Table 6	% resolved within local targets
elha 2023	<b>96.5%</b>
elha 2022	<b>97.5%</b>
elha 2021	<b>98.7%</b>
Scottish Av 2023	94.2%
Scottish Av 2022	94.7%
Scottish Average 2021	94.4%
Neighbours’ Av 2023	92.4%
Neighbours’ Av 2022	92.2%
Neighbours’ Av 2021	93.6%
Peer’s Av 2023	87.4%
Peer’s Av 2022	90.1%
Peers’ Av 2021	84.5%
ELC 2023	73%
ELC 2022	78.2%
ELC 2021	84.1%

<sup>3</sup> elha’s equivalent performance in 2015 was 52%  
 3.1 Independent Review of ELHA Performance 2022/23

**6.0 Value for Money: ELHA**

elha’s performance in collecting rent has fallen slightly (-c1%) but is aligned with 2020 performance and very slightly ahead of the Scottish average. Void performance has been maintained and remains better than the national average. The time taken to re-let has been improved and remains significantly better than the national average: elha’s average re-let time continues to be c50% shorter than the national average.

Table 7	% of total rent due collected	% rent not collected due to voids	Average number of days to re-let
elha 2023	<b>99.9%</b>	<b>0.5%</b>	<b>22.2</b>
elha 2022	<b>100.7%</b>	<b>0.5%</b>	<b>25.7</b>
elha 2021	<b>99.4%</b>	<b>0.3%</b>	<b>25.8</b>
Scottish Av 2023	<b>99%</b>	<b>1.4%</b>	<b>55.6</b>
Scottish Av 2022	<b>99.3%</b>	<b>1.4%</b>	<b>51.6</b>
Scottish Av 2021	<b>99.1%</b>	<b>1.4%</b>	<b>56.3</b>

**6.1 Value for Money Comparison**

Table 8 shows that elha’s performance is similar or better against most indicators compared to each of the comparison groups. In terms of elha’s internal trend, performance against the rent collection indicators has recovered to 2020 levels. elha re-let times have improved and are now better than in 2020. They remain significantly better than the national average and ELC; the peer group and neighbours have improved and are now closer; ELC and the Scottish averages are significantly poorer (65 days and 56 days respectively).

Table 8	% of total rent due collected	% rent not collected due to voids	Average number of days to re-let
elha 2023	99.9%	0.5%	22.2
elha 2022	100.7%	0.5%	25.7
elha 2021	99.4%	0.3%	25.8
Scottish Av 2023	99%	1.4%	55.6
Scottish Av 2022	99.3%	1.4%	51.6
Scottish Av 2021	99.1%	1.4%	56.3
Neighbours 2023	99.5%	0.6%	30
Neighbours 2022	100.8%	1.8%	39.8
Neighbours 2021	99.2%	0.6%	42.8
Peers 2023	99%	0.6%	24.3
Peers 2022	98.5%	1%	33
Peers 2021	99.5%	1.5%	57.6
ELC 2023	101.4%	1.09%	65.2
ELC 2022	103%	1%	66.2
ELC 2021	102.1%	0.6%	51.9

## 7.0 Complaints Handling

Table 9 includes comparison information for all of the landlords in respect of response times for Stage 1 and Stage 2<sup>4</sup>. Comparisons for elha are provided for 3 years; for the other landlords, performance over the last two years is provided. elha’s performance has fallen slightly (-c2%) in respect of Stage 1 complaints but improved noticeably in respect of Stage 2 with 100% being responded to in full. The percentage of Stage 1 complaints responded to in full by elha is comparable to the other landlords in the exercise; better than some and ahead of the national averages (95.3% for stage 1 complaints response and 92.5% for Stage 2). Comparisons are difficult because of the variations in number of complaints received by the landlords.

<sup>4</sup> Extracted from SHR Dataset August 2023  
 3.1 Independent Review of ELHA Performance 2022/23



Table 9	% Stage 1 responded in full	% Stage 2 responded in full
elha 2023	98.3%	100%
elha 2022	100%	95.8%
elha 2021	97.7%	88.9%
elha 2020	97.4%	91.7%
Angus 2023	96.5%	69.2%
Angus 2022	95.6%	82.35%
Berwickshire 2023	100%	98.4%
Berwickshire 2022	100%	100%
CRE / PfPS 2023	98%	92.6%
CRE / PfPS 2022	89.2%	86.9%
Eildon 2023	100%	100%
Eildon 2022	97.2%	95.65%
ELC 2023	97%	85.1%
ELC 2022	97.3%	92.86%
Loreburn 2023	97.9%	91.7%
Loreburn 2022	99.4%	100%
Manor Estates 2023	100%	88.5%
Manor Estates 2022	100%	84%
Melville 2023	99.4%	100%
Melville 2022	99.3%	100%
Osprey 2023	100%	100%
Osprey 2022	100%	100%
Waverley 2023	98.1%	92.6%
Waverley 2022	100%	100%

**8.0 Conclusion**

Performance during the year amongst the comparisons has shown evidence of improvement but continues to be impacted by the challenges associated with the post-pandemic recovery and volatile economic and operating climates.

elha's performance continues to be ahead of the national averages against almost all of the indicators: the only area where performance is below average is in respect of tenants' satisfaction with the repairs service. This is obviously a critical measurement for all landlords but it should be noted that elha's performance in terms of repairs 'right first time' is better against all the comparisons. The TSS reported that the 'least satisfactory' element of tenants' satisfaction with the repairs service was 'contractors carrying out the job expected'. elha will, no doubt, want to analyse this aspect of performance more closely.

Nationally, the SHR reported that levels of overall tenant satisfaction again decreased slightly: this was true for elha where satisfaction fell by 4%. As the comparative evidence base develops, trends will become more evident. Using the current, revised comparisons demonstrates that elha continues to compare very positively against almost all indicators and all comparisons.

## Banking Policy Review

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

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#### 1.0 Introduction

As part of the policy review cycle, the Banking Policy is due for review. It was last reviewed and approved, by the then Finance & Audit Sub-committee, in November 2018. A copy of the current **Policy Document** is attached for information.

#### 2.0 Policy Review

The Director of Finance & Corporate Services has reviewed this policy and considers that it is no longer required. The policy is repeated within the Association's Financial Regulations. An extract of the Financial Regulations where the repetition occurs is attached as **Appendix 1** to this report.

The key points to note are;

Banking Policy	Financial Regulations
Section 1.0	Replicated at 3.3.1
Section 2.0	Replicated at 3.3.2 – 3.3.5
Section 3.0	Covered at 3.3.6 – 3.3.7  3.2 of the Banking Policy is not replicated in reference to recording and banking monies daily, however section 3.3.6 notes "prompt" banking and cash payments which is reflective of current arrangements given the reduced cash receipted into the business since 2018.
Section 4.0	4.1 of the Banking Policy notes references to other policies. This is included in Section 7 of the Financial Regulations.  4.2 of the Banking Policy notes Management Committee will appoint the Group's bankers. At 3.3.3 only bank accounts can be opened by Management Committee approval. This is deemed to be the same thing.

	<p>4.2 of the Banking Policy refers to the procurement of banking services in line with the Procurement Policy. This is not explicitly referenced in this policy; however, this service will be reviewed like any other in line with the Procurement Policy.</p> <p>4.3 of the Banking Policy is the review cycle.</p>
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The Financial Regulations mention the Banking Policy at Section 3.3. It is proposed that this reference is removed.

### 3.0 Equality Impact Assessment

Given the policy being proposed for removal is covered by the Financial Regulations, no Equality Impact assessment has been conducted as the policy provisions are in another policy document.

#### **Recommendation**

The Management Committee is asked to approve removal of the Banking Policy, and the removal of the reference to this Policy in the Financial Regulations.

**Approved by Finance and Audit Sub-Committee 15/11/18**

**Date Issued** February 1998  
**Last Review Date** November 2018  
**Department** Finance  
**Title** **Banking**  
**Objective** To describe our banking arrangements.  
**Responsible** Director of Finance  
**Next Review Date** **November 2023**

## **1.0 INTRODUCTION**

1.1 We will maintain bank accounts as required and agreed by the Finance and Audit Sub-Committee.

## **2.0 BANKING ARRANGEMENTS**

2.1 The Director of Finance is responsible for liaising with our bankers in relation to our bank accounts and the issue of cheques. The Director of Finance has the authority to order all cheques and shall ensure that proper arrangements are in place for their safe custody.

2.2 Only the Director of Finance may open or close a bank account for dealing with our funds. All bank accounts shall be in the name of the Association.

2.3 All payments made from the Association's bank accounts and mandates for direct debits/standing orders must be authorised in accordance with our "Authorisations and Standard Charges and Allowances Policy.

2.7 The Director of Finance is responsible for ensuring that all bank accounts are subject to regular reconciliation and independent review, and that large or unusual items are investigated as appropriate.

## **3.0 CASH RECEIPTS**

3.1 The Director of Finance is responsible for the prompt collection, security and banking of all income.

**Approved by Finance and Audit Sub-Committee 15/11/18**

- 3.2 The Finance Department will record and bank all monies received on a daily basis.
- 3.3 The Finance Manager will ensure that we hold and transport cash in line with our insurer's requirements.
- 3.4 We will not cash personal or other cheques out of money received.

**4.0 CONCLUSION**

- 4.1 This policy should be read in conjunction with our "Treasury Management", "Authorisations and Standard Charges and Allowances" and "Payroll" Policies, and related procedures.
- 4.2 Our Management Committee is responsible for the appointment of our bankers. The provision of banking services will be reviewed in accordance with our Procurement Policy.
- 4.3 The Director of Finance will ensure that this policy is reviewed at least every five years and that any amendments required are submitted to the Finance and Audit Sub-Committee for approval.

**Approved at Management Committee 26/11/20**

**3.3 BANKING AND CASH ARRANGEMENTS**

Our “Banking Policy” describes our banking arrangements

- 3.3.1 We will maintain bank accounts as required and agreed by the Audit & Assurance Committee.
- 3.3.2 The Director of Finance is responsible for liaising with our bankers in relation to our bank accounts and the issues of cheques. The Director of Finance has the authority to order all cheques and shall ensure that proper arrangements are in place for their safe custody.
- 3.3.3 Only the Director of Finance may open or close a bank account for dealing with our funds, with the authority of the Management Committee/Subsidiary Board. All bank accounts shall be in the name of the Association or its Subsidiaries.
- 3.3.4 All payments made from the Association’s bank accounts and mandates for direct debits/standing orders must be authorised in accordance with our “Authorisations and Standard Charges and Allowances Policy.
- 3.3.5 The Director of Finance is responsible for ensuring that all bank accounts are subject to regular reconciliation and independent review, and that large or unusual items are investigated as appropriate.
- 3.3.6 The Director of Finance is responsible for the prompt collection, security and banking of all income and for ensuring that all relevant requirements of the Group’s Insurers are followed.
- 3.3.7 We will not cash personal or other cheques out of money received.

**7.0 IMPLEMENTATION, MONITORING AND REVIEW**

**7.1 IMPLEMENTATION**

These Financial Regulations describe the overall framework of the Group’s financial arrangements. The detailed arrangements for implementing these Regulations are contained in relevant policies and procedures including (but not limited to) the following:

- Authorisations and Standard Charges and Allowances
- Treasury Management
- Risk Management Strategy

**Approved at Management Committee 26/11/20**

- Insurances
- Payroll
- Rents and Service Charges
- Rent Arrears
- Chargeable Repairs
- Recharge of Costs to Owner Occupiers (procedure)
- Information Technology Systems
- Gifts and Hospitality
- Management Committee and Staff Expenses
- Fraud and Theft
- Anti-Bribery and Corruption
- Finance Department Procedures



## Provision of Agency Services Review

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

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#### 1.0 Introduction

As part of the policy review cycle, the Provision of Agency Services Policy is due for review. It was last reviewed and approved, by the then Finance & Audit Sub-committee, in November 2018.

#### 2.0 Policy Review

The Director of Finance & Corporate Services has reviewed this policy, and the proposed changes are tracked in the **Policy Document** attached to this report.

The key changes proposed are;

Section	Update
1.0	Removed reference to a guidance document that is now 28 years old.
Appendix 2 & 2A	This references the guidance document noted above. The remaining relevant parts of this appendix have been moved into the policy document itself.
3.0	Additions are salient points from Appendix 2. Included narrative around ensuring compliance with Equalities and Diversity policy.
4.0	Addition includes reference to where agreements should be centrally stored.
5.0	Addition adds in responsibility that the Finance Manager should be consulted around insurance requirements of any service, and that they will be the point of contact with the insurer.
6.0	Additions are salient points from Appendix 2.
7.0	Addition included for Director of Finance & Corporate Services to ensure services will be profitable, based on assumptions of budgeted costs and income.
9.0	Section updated to refer to Code of Conduct in place.
11.0	Some minor narrative changes.
Appendix 1	Some minor narrative changes.

**3.0 Current use of the Policy**

The application of this policy is still applicable. It is currently used for:

- Homes for Life – A Service Level Agreement is in place to deliver support services for These Homes (this is ongoing and generates £600 in income annually)
- Homes for Life – Tenancy Support Service (a Money and Home Energy Advice Service will also follow on from that next year), from 1 November 2023 to 31 March 2024 this will generate £5,625 worth of income.

**Recommendation**

The Management Committee is asked to approve the revised Provision of Agency Services Policy.

ELHA POLICY

<b>Date Issued</b>	March 2000
<b>Department</b>	Finance
<b>Title</b>	Provision of Agency Services
<b>Objective</b>	To describe how we provide agency services to others
<b>Responsible</b>	Director of Finance & Corporate Services
<b>Last Review Date</b>	November 2023
<b>Next Review Date</b>	November 2028

### 1.0 Introduction

~~We originally developed this policy using the SFHA's Guidance Booklet "Buying and Selling Services" which was published in September 1995.~~

There are a number of reasons why we might consider providing agency services to another body, including: a direct request for assistance, an invitation to tender, to generate additional income, or in order to exploit surplus resources.

We may offer agency services providing we can meet the following criteria:

### 2.0 Legitimacy of Providing Services

The proposal must be legitimate, that is:

- a) It must be allowed within the terms of our rules
- b) It will not jeopardise our Charitable Status

### 3.0 Considerations

Having established that we can legally provide the service, we must be also be satisfied that:

- We have a clear understanding of the client's needs
- We have the capacity to deliver the required service within the proposed time-scale
- The provision of the service will not compromise or jeopardise our ability to discharge our own responsibilities

- We are not committing ourselves to a much wider role than we can sustain
- We have identified any potential areas where a conflict of interest may arise and have agreed on how we would manage such instances
- We have the necessary skills to provide the service
- We have one Senior Management Team Member with specific responsibility for managing the contract and liaising with the client
- We can deliver the services in line with our Equality and Diversity policy

### 4.0 Formal Agreement

Prior to the provision of services, we must be satisfied that both parties are clear about their respective responsibilities, liabilities and obligations. This will be best achieved through a formal written agency agreement. A checklist for the drawing up of an agency agreement is provided at **Appendix 1**. The agreement should be signed by both parties prior the provision of services starting. This agreement should be stored in J:\Corporate\Key Information\Contracts, Licenses and Agreements.

### 5.0 Indemnity Insurance

The Finance Manager will be advised of the services being provided and We will liaise with the insurers to ensure that we have adequate and appropriate indemnity insurance cover in place, prior to providing any services.

### 6.0 Review of Services

We will clearly detail monitoring arrangements in the agency agreement. This will establish clear lines of communication with the client. Regular meetings should take place at officer level and be reported back to the respective Governing Bodies. In addition representatives from our Management Committee and the Senior Management team will meet, as required, with representatives of the purchasers governing body and senior staff. Where there is representation on the client's committee by our staff or Management Committee members, our Management Committee will require regular feedback on the general performance of Agency Services.

### 7.0 Fee Arrangements

We must ensure that the cost of providing a service is fully recovered in the fee charged. We will identify and quantify potential costs, including an appropriate proportion of overheads, when calculating the proposed fee level. We will request a detailed brief of the services required from the potential client at the outset.

We will include in the fee to be charged a sum based on a percentage of direct costs to cover the risk of cost overruns. The percentage will be dependent upon the quality and extent of the brief provided by the client on the services requested.

This will be reviewed and agreed with the Director of Finance & Corporate Services.

We will review fee levels on an annual basis, or sooner if required.

## 8.0 Cost Overruns

We will minimise the risk of cost overruns by:

- Carefully identifying costs at the outset
- Developing and adhering to a clear agency agreement
- Incorporating a reasonable risk percentage within fee calculations
- Agreeing costs and fees in advance of any additional work being undertaken

We will seek reimbursement for cost overruns which result from actions taken by the client. Where the cost overrun is a result of action/inaction taken us, we will review the services to prevent further cost overruns.

We will not knowingly enter into a contract to provide agency services which would result in overall loss to us.

## 9.0 Code of Conduct

~~When providing external services, we will adhere to SFHA's Code of Conduct, a copy of which is attached at **Appendix 2**.~~

All ELHA staff sign up to ELHA's Code of Conduct at the start of their employment. This covered conflicts of interest and staff should manage any potential conflicts of interest in line with this code.

## 10.0 Data Sharing

If we need to share any personal data in order to provide agency services, we will ensure a Data Sharing Agreement is in place, as set out in **Appendix 1**.

## 11.0 Policy Review

The ~~Chief Executive~~Director of Finance & Corporate Services will ensure that this policy is reviewed at least every five years, ~~and that a~~Any amendments required are submitted to the Management Committee Finance and Audit Sub-Committee for approval.

## Appendix 1

Agency Agreement

Checklist

1. Names and addresses of parties to the agreement.
2. Specification of the services to be provided.
3. Duration of the agreement.
4. Arrangements for monitoring and review of the operation of the agreement: regular meetings should take place between the purchaser and their agent to ensure the smooth operation of the agreement. These meetings will also provide an opportunity to agree any renegotiation of the agreement e.g. because of changes to the purchaser's requirements.

An annual review meeting should take place to provide a formal opportunity for the operation of the agreement and the delivery of services to be evaluated by both parties.

5. Names of key contact people in both organisations.
6. Specification of the method of service provision, including service availability, staffing provision and timescales for service requests.
7. Specification of standards to be met (both the Scottish Housing Regulator's standards and those of purchasing organisation) and associated Key Performance Indicators.
8. Arrangements for the resolution of disputes: a procedure should be specified which clarifies the various stages to be observed. These should involve a gradual progression from the initial discussion of a problem, to an exchange of letters, meetings between the two parties at both officer and committee level, before eventually progressing to the more formal process of arbitration.
9. Specification of costs of provision of services and arrangements for review of costs.
10. Arrangements for payment and any penalties for non-payment
11. Reporting arrangements.
12. Requirements to attend and/or service committee meetings.
13. Monitoring arrangements.
14. Arrangements (if any) for the renegotiation of any element of the agency agreement: (this should be linked to the section dealing with monitoring and review). Renegotiation of any element of the agreement should arise from the monitoring process. Any renegotiation of terms should be recorded in an exchange of letters, which should be appended to the original agreement.

15. Arrangements for termination: most legal agreements normally make provision for termination by either party. Notice must be given in writing and it is suggested that, for an agency agreement, the required period of notice should not be less than three months.
  
16. Agreements for the sharing of data : (In order to monitor compliance with Data Protection laws, a Data Sharing Agreement will be required which will include the processing of data, security measures to be implemented and responsibility for any breaches).

### ~~Code of Conduct for Service Providers~~

~~This code of Conduct has been prepared by the SFHA to reflect the wish to retain the integrity of Scotland's voluntary housing movement. As the purchase and provision of services to housing associations and co-operatives becomes more widespread, the SFHA believes that this Code of Conduct will be helpful in establishing the standards which its members will observe in the provision of services to others.~~

~~This Code of Conduct was drafted as part of SFHA's Guidance Booklet on Buying and Selling Services, which was published in September 1995.~~

~~It is recognised that one of the greatest strengths of Scotland's voluntary housing movement lies in its willingness to share information and experience. The provision of informal advice at no cost will continue to be a valuable resource but more formal arrangements have now developed. In providing advice on a formal basis, housing associations should:~~

- ~~• ensure that they have a clear understanding of the client's needs~~
- ~~• ensure that they have the capacity and necessary skills to provide the advice required~~
- ~~• establish clear lines of communication between the agent and the client~~
- ~~• ensure that the advice provided is accurate and is the subject of a written report to the client's committee~~

~~**Providing Services:** The SFHA believes that purchasing housing associations should prepare a brief which potential agents may respond to. In responding to such a brief and in subsequently providing services, the agent should:~~

- ~~• ensure that their proposal addresses the requirements of the brief~~
- ~~• ensure that at least one senior officer has specific responsibility for managing the contract and liaising with the client~~
- ~~• ensure that the necessary skills and resources are available within the timescale required by the client~~
- ~~• ensure that a realistic charge is set for the work required which is understood by the client~~
- ~~• regularly review the operation of the agreement and raise any potential problems with the client at the earliest opportunity~~
- ~~• provide regular reports to the client on both the service being provided (i.e. in accordance with the reporting requirements of the brief) and on the operation of the contract~~



### ~~Code of Conduct for Service Providers~~

~~In providing services to a number of clients, agents should be aware of the potential which exists for a conflict of interest to arise.~~

~~In responding to a request for assistance, agents should make sure that:~~

- ~~• no conflict of interest arises — this should be reviewed regularly in case such a conflict of interest arises during the course of a piece of work~~
- ~~• in the event of a conflict of interest arising, the agent should declare their interest and ensure their declaration is recorded. It may be the case that some conflicts of interest may be manageable by allocating different staff to each project. This will not always be possible and may be inappropriate in some circumstances. The potential conflict — and the proposals to deal with it — should be raised with the relevant parties~~
- ~~• agents should not agree to provide advice to housing associations on an independent basis if there is a possibility that they would consider tendering for the formal agency contract~~

~~**Handling Disputes:** Even in a well-managed contract, it is possible that disputes may arise. The agency agreement should detail the way in which disputes are handled, in accordance with the guidance contained in the SFHA's Guidance Booklet. In responding to complaints, agents should:~~

- ~~• ensure that problems are tackled swiftly~~
- ~~• ensure that the complaints are tackled in accordance with agreed procedures~~
- ~~• ensure that informal steps are taken to resolve disputes before entering into the formal procedure~~

## HR Equality & Diversity Policy

### Report by Martin Pollhammer, Chief Executive – for approval

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#### 1.0 Introduction

The Association currently has an Equality & Diversity Policy which details how the principles of Equality and Diversity will be applied in all activities that relate to our stakeholders. This policy was recently reviewed, and an outcome of the review was that there was a need for an HR specific Equality & Diversity policy.

#### 2.0 Policy Document

The Executive Support Officer (HR) has produced a draft HR specific Equality & Diversity Policy using a combination of EVH's model policy, ACAS' model policy and guidance from the ACAS website. The draft policy is designed to show how the Association applies the principles of Equality and Diversity to the following areas:

- Recruitment, Selection and Succession
- Terms & Conditions of Employment
- Training and Development
- Redundancy Selection

#### 3.0 JCC Review

At the last JCC meeting on 13 September 2023, the proposal to create the HR specific policy was agreed, however, due to the timing, the policy was not able to be presented to the JCC at Stage 1. It was instead agreed that the policy would be emailed to the JCC for review and comments.

The JCC made one suggestion to rename the "Recruitment and Selection" section to "Recruitment, Selection and Succession". This was suggested to show that the principles of Equality and Diversity will be applied to not only the onboarding of new staff, but also the internal succession planning for existing staff. This change is highlighted throughout the policy as a tracked change.

Again, due to the timings of the JCC and Management Committee meetings, the final JCC Stage Two review will take place on 22 November 2023. Any final changes required as a result will be reported to the meeting.

**Recommendation**

The Management Committee is asked to approve the new HR Equality & Diversity Policy.

**GROUP POLICY**

<b>Date Issued</b>	November 2023
<b>Department</b>	Corporate
<b>Title</b>	<b>HR Equality &amp; Diversity Policy</b>
<b>Objective</b>	To describe our arrangements for making sure that we apply the principles of Equality & Diversity in all our HR activities.
<b>Responsible</b>	Chief Executive
<b>Next Review Date</b>	November 2028

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This policy should be read in conjunction with our Code of Conduct for Employees, our Dignity at Work Policy and our Equality & Diversity Policy.

**1.0 Introduction**

- 1.1 The Association has an Equality & Diversity Policy, which details how we will apply the principles of equality and diversity in all activities that relate to our stakeholders. HR involves some specific Equality & Diversity practice, and so this separate Policy was developed to complement our overall approach.
- 1.2 This Policy identifies how we will apply the principles of equality and diversity to the following HR specific areas:
  - Recruitment, ~~and~~ Selection and Succession
  - Terms & Conditions of Employment
  - Training and Development
  - Redundancy Selection
- 1.3 This Policy should be considered in conjunction with our overall Equality & Diversity Policy.
- 1.4 All employees are required to abide by this policy. We oppose all forms of unlawful discrimination in relation to employment.

## 2.0 Policy Principles

### This policy aims to:

- 2.1 Ensure equality and diversity practices (in line with the Equality Act 2010) are implemented into our HR practice, and ensure that employees are treated with fairness and respect.
- 2.2 Ensure implementation of fair and just employment practices ensuring that no job applicant or employee will receive less favourable treatment on any grounds.
- 2.3 Ensure people are recruited and employees promoted solely based on their own merit, experience, ability and potential. This applies throughout the entire duration of employment as all decisions will be based on only relevant merits.
- 2.4 Provide an environment appropriate to the needs of those from all walks of life and offer a culture that respects and values each other's differences and promotes dignity, equality and diversity.

## 3.0 Recruitment, Selection and Succession

- 3.1 As noted within this Policy at Section 2.3, all recruitment, selection and succession decisions will be based completely on the merits and abilities of candidates alone and no other criteria will be used. In order to achieve this, equality and diversity practices will be integrated into every stage of ~~the~~ recruitment, ~~and~~ selection and succession processes.
- 3.2 To highlight our commitment to promoting equality and diversity from the beginning of the employment relationship, all vacancies will be aimed at as wide a group as possible and any advertisement for a vacancy within the Association will state that an Equality & Diversity policy is in place. In addition, the advert will also display any signs of equality bodies that we are affiliated with. The information contained in the advert and all vacancy literature will be clear and accurate to attract the most appropriate candidates from all groups across society, to allow them to decide their own suitability for the vacancy and whether they wish to proceed with applying.
- 3.3 For those that wish to apply, we will ensure that all applications have clear instructions for completion and application forms will be free from personal questions that are not relevant to the vacancy and that may lead to discrimination.

- 3.4 We will ensure all staff involved at any stage in the recruitment and selection process will receive equality and diversity awareness training. This will ensure that those involved in the recruitment process will not discriminate either knowingly or unknowingly by asking any questions which may lead to discrimination.

### **4.0 Terms & Conditions of Employment**

- 4.1 As part of the employment relationship being covered under this Equality & Diversity policy, all contracts of employment will be issued in accordance with the job role and not the job holder. Employee's Terms & Conditions will be standard across all employees regardless of any of the protected characteristics. Employees will not receive less favourable Terms & Conditions for any reason other than relating specifically to the job role and the grade it attracts.

### **5.0 Training and Development**

- 5.1 Equality and diversity will apply throughout all training activities and resources. Training and development opportunities will be given to all employees according to their job role. It is crucial that all employees are able to participate and enjoy any training opportunities or activities without discrimination or fear of harassment. Every attempt will be made to ensure learning materials will provide a positive image of people reinforcing an image and of equality of opportunity.

### **6.0 Redundancy Selection**

- 6.1 Redundancy selection will be made according to the statutory requirements and in line with our Terms & Conditions. Criteria will be discussed with the Trade Union and or nominated representatives. The criteria will be set out and will be objectively fair and consistent. This will ensure that employees selected for redundancy are selected according to the chosen selection criteria and not in any discriminatory way either indirectly or directly.

### **7.0 Policy Implementation**

- 7.1 We will ensure that all new employees and Management Committee members will receive information in their induction about this Policy.
- 7.2 Appropriate training and guidance will be available to promote equality and diversity among staff.

- 7.3 This Policy applies to everyone in the Association and everyone has a responsibility to be alert to discriminatory behaviours and practices should they occur.

### **8.0 Misconduct**

- 8.1 All staff should understand they, as well as their employer, can be held liable for acts of discrimination, bullying, harassment and victimisation in the course of their employment, against fellow employees, Management Committee Members, members of the public, contractors and stakeholders.
- 8.2 We will take seriously complaints of discrimination, bullying, harassment and victimisation by fellow employees, Management Committee Members, members of the public, contractors and stakeholders.
- 8.3 Such acts will be dealt with as misconduct under our Grievance and/or Disciplinary procedures, and appropriate action will be taken. Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

### **9.0 GDPR Compliance**

- 9.1 The organisation will treat personal data in line with our obligations under the current data protection regulations and in line with our own Privacy Policy. Information regarding how your data will be used and the basis for processing your data is provided in our employee Fair Processing Notice.

### **10.0 Monitoring and Review**

- 10.1 The Chief Executive will ensure that this policy is reviewed every five years and any recommended changes must be approved by the Management Committee. The absence of such a review will not cause it to lapse.