



Probity (Payments and Benefits) Policy

2022 - 2025

Probity (Payments and Benefits) Policy

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Policy Links:	<ul style="list-style-type: none"> Rules Staff terms and conditions including their contracts of employment Board Members' services agreements Board Member Pay & Expenses Policy Code of Conduct Standing Orders – inc Scheme(s) of delegation / and financial regulations Whistleblowing Policy Procurement Standing Orders and guidelines Anti-Fraud and Corruption Policy Anti-Bribery Policy Regulatory Standards Legislation Code of Governance Disciplinary Procedures Redundancy policy Executive Pay Policy Pay progression policy Honoraria and acting up policy

Brief Policy Summary:

Lincolnshire Housing Partnership Limited (LHP) is committed to achieving the highest standards of probity and good governance and promotes openness and transparency in all aspects of its work. This policy sets out what colleagues should do to put those principles into practice and how to manage situations where potential conflicts of interest or suggestions of bias might arise.

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1. Introduction

- 1.1 The conduct of individuals impacts directly on the public reputation of LHP and all involved with LHP must strive to conduct the business in ways that will maintain the good reputation of the sector.
- 1.2 It is important LHP has a robust probity policy in place to manage situations where potential conflicts of interest or suggestions of bias on the part of decision-makers might arise.
- 1.3 This policy helps ensure LHP meets its legal obligations which include:
 - Section 122 of the Housing & Regeneration Act 2008 (the Act) which restricts the making of gifts and payment of dividends and bonuses to all Board/committee members, shareholders, former shareholders, and also their family members or companies in which they hold a directorship.
 - The Bribery Act 2010.
 - The principles of charity law which prohibits benefits being given to its trustees without there being express authority to do so.
- 1.4 This policy helps ensure LHP meets its regulatory obligations which include:
 - the Regulator of Social Housing (RSH).
 - the Financial Conduct Authority (FCA); and
 - Charity Commission guidance.
- 1.5 This policy helps ensure LHP demonstrates best practice and safeguards LHP's Reputation – as represented in the National Housing Federation (NHF) Code and the Seven Principles of Public Life, established by the Nolan Committee on Standards in Public Life. These principles should be borne in mind whenever colleagues are called upon to consider or make decisions on any matter that relates to this Policy, whether in their own capacity or that of another colleague to whom a decision is delegated.

2. Scope

- 2.1 This Policy applies to all Shareholders (current and former), Board and Committee members, Board Trainees, employees, agency staff, consultants, contractors, and volunteers – collectively referred to as colleagues in this policy.

3. Definitions

- 3.1 **Benefit** includes, but is not limited to:
 - ex-gratia gifts or benefits.
 - the grant of a loan including salary advances.
 - the award of a contract of employment.

- sale of a property for value.
 - the grant of a tenancy or licence.
 - the grant of a lease (e.g., shared ownership).
 - award of any type of commercial contract (e.g., contract for services).
- 3.2 **Bonus** - a discretionary payment reflecting good performance under any contract.
- 3.3 **Close Association** - someone a member of the public might reasonably think an individual would be prepared to favour or advantage (e.g., a friend, colleague, neighbour, business associate or someone known through general social contacts).
- 3.4 **Close Relative** - any person so close to a colleague there is a real risk any decision or judgement of that colleague could be influenced, including a person's husband, wife, partner, parents, grandparents, children, grandchildren, brothers, sisters, and similar relations by marriage. It has a wide meaning and can include people who are similar to family members even where there is no relation by birth or law.
- 3.5 **Executive Leadership Team** - LHP's Executive Leadership Team comprising the Chief Executive, Executive Director of Finance, Executive Director of Property Services, Executive Director of Customers, and Executive Director of Strategy, Culture & Digital.
- 3.6 **Group** - the group of companies of which LHP is the parent, comprising Shoreline Property Services Limited, Humber Homes Limited, Speedwell Homes Limited, Boston Mayflower (Finance) PLC and any other subsidiary that may exist from time to time.
- 3.7 **Relevant Person** - any colleague, a Close Relative of a colleague or a business trading for profit of which a director is a colleague.
- 3.8 **Subsidiary** - means an incorporated or unincorporated body which is from time to time a subsidiary or subsidiary undertaking of the Parent within the meaning of section 1159 of the Companies Act 2006 (whether or not the relevant body is incorporated under that Act) and/or is a subsidiary within sections 100 and 101 of the Co-operative and Community Benefit Societies Act 2014 and includes Shoreline Property Service Limited, Humber Homes Limited, Speedwell Homes Limited, and Boston Mayflower (Finance) PLC (together referred to as the "**Subsidiaries**")

4. **Payments to Shareholders**

- 4.1 LHP is restricted from making any gift or paying any dividend or bonus to Shareholders, people who have been Shareholders at any time, their Close Relatives, and companies of which any of these people are directors.

4.2 There are statutory exceptions to this restriction that may be relied upon, as long as these gifts or payments are also permitted by LHP's Rules and Standing orders:

- gifts to Shareholders in their role as a Board member which are permitted within this policy.
- payments of interest due on capital lent to LHP or subscribed in its shares; and
- payments paid for the benefit of LHP's customers, to assist the customer to obtain other accommodation by acquiring a freehold or long-leasehold interest in a dwelling.

4.3 If a payment is made, which does not fall within these exceptions, LHP has the right under the Act to recover the wrongful gift or payment as a debt from the recipient. The Regulator may also require LHP to take action to recover a wrongful gift or payment.

5. Payments to Board/Committee members

Remuneration

5.1 LHP only allows payments and benefits to Board/Committee members and Trainee Board members under individual contracts for services as approved from time to time by the Board or as approved elsewhere in this Policy and the NHF Code.

5.2 Such payments and benefits shall only be for services carried out in their role and not for additional services provided to LHP from time to time (which are generally prohibited).

5.3 Remuneration decisions relating to all Board/Committee members and Trainee Board members will be made transparently and fairly by the Board in accordance with the various LHP companies' Rules and remuneration policies.

Bonuses

5.4 By virtue of section 122 of the Act, bonuses must not be paid to any Board or Committee Member, former Board or Committee Member, or a Close Relative of a Member or former Member.

Expenses

5.5 To assist in the proper performance of their duties, LHP may reimburse Board and Committee members and Trainee Board members for reasonable expenses legitimately incurred in the course of their duties for LHP as set out in the Board Member Pay & Expenses Policy.

5.6 Board/Committee members and Trainee Board members must follow the appropriate procedures prescribed by LHP for claiming any expenses they have incurred from time to time.

5.7 LHP is under no obligation to pay any expenses claimed by a member who is unable to produce appropriate receipts or other evidence that they have been incurred.

5.8 Any disputes or disagreements about expenses from time to time will be determined by the Executive Director of Finance in their absolute discretion, unless the member in question is the Chair, in which case the Chief Executive on advice from the Executive Director of Finance will determine the decision.

Goods and services

5.9 LHP may not remunerate a Board/Committee member under a contract for the supply of services, or the supply of goods in connection with those services.

Rent

5.10 LHP may not let premises from a Board/Committee member.

Indemnity

5.11 LHP may indemnify a Board/Committee member (or former Board/Committee member) against any expenses incurred by them in connection with any civil or criminal proceedings in relation to LHP or any application for relief from liability for negligence, default, breach of duty or breach of trust in relation to LHP.

5.12 LHP may not indemnify a Board/Committee member (or former Board/Committee member) where:

- they are convicted in criminal proceedings and the conviction is Final.
- a Final judgment is given against them, and the judgment is Final.
- the court refuses (and that refusal is Final) them relief in an application for relief; or
- that indemnity is in respect of any liability of the Board/Committee 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.

A judgment, conviction or refusal becomes Final where the period for bringing an appeal or further appeal has ended; or an appeal is determined, abandoned, or otherwise ceases to have effect.

6. Payments to Employees

Remuneration

6.1 LHP may make payments of remuneration to employees where such payments are due under a contract of employment, are made under approved pay related policies or are otherwise made in accordance with this Policy from time to time.

6.2 Remuneration decisions relating to all employees including the Executive Leadership Team will be made by the Board in line with the Standing Orders.

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- 6.3 LHP will make remuneration decisions transparently and fairly, in accordance with the Standing Orders and remuneration policies from time to time.

Benefits

- 6.4 LHP may only grant benefits of any description to employees where such benefits are permitted under their contract of employment, permitted under an approved recognition programme, are otherwise in accordance with this Policy or are approved by the Board.

Bonuses

- 6.5 LHP may make bonus payments to an employee in accordance with the relevant contract of employment or any policy on bonuses approved by the Board from time to time.
- 6.6 Where a bonus payment is proposed which is not in accordance with the employee's contract of employment or an established bonus policy, 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.
- 6.7 Any bonus payments will be made in accordance with comparable levels in the sector and having regard to LHP's obligations as a Registered Provider of Social Housing and an exempt charity.

Severance and redundancy

- 6.8 For the purpose of this Policy, severance payments shall include out of court settlements in relation to cases referred to the Employment Tribunal, which shall include cases which LHP has been advised (by an independent legal advisor or any other suitably qualified person) are likely to be referred to the Employment Tribunal and would have a reasonable prospect of success.
- 6.9 LHP may make reasonable and fair severance and redundancy payments to employees in accordance with its published redundancy and severance policies.
- 6.10 Employee severance and redundancy payments to employees shall be approved by the Executive Leadership Team in accordance with LHP's published redundancy and severance policies, save for payments to members of the Executive Leadership Team, which shall be made by the Board.
- 6.11 In deciding what is a reasonable and fair level of payment, the following considerations shall be taken into account:
- the total level of payment due to the Employee contractually, including pension and notice requirements.
 - advice from an independent legal advisor and any other suitably qualified persons, if required.
 - any relevant statutory formula.
 - any published policies of LHP.

- any relevant guidance on best practice.
- information on comparable payments made in the sector (if available).
- the Employee's conduct and reasons for departure; and
- potential risks to LHP (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 potential adverse impact on LHP if settlement is not made.

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

6.13 The total level of severance and redundancy payments made each year will be identified in LHP annual accounts.

6.14 Subject to paragraphs 6.1 to 6.7 above (inclusive), any non-contractual payment proposed to be made by LHP to an Employee must be approved by the Chief Executive for employees who are not members of the Executive Leadership Team, and by the Board or a properly authorised committee for the Executive Leadership Team. Out of court settlements for employment related disputes must be approved by Board where the proposed settlement is more than £30,000.

7. Benefit schemes

7.1 From time-to-time LHP may put in place or arrange to participate in benefit schemes for some or all its colleagues and/or customers with external organisations where such benefits do not require any payment from LHP, such as discount cards for external retail and leisure organisations.

7.2 Where such benefit schemes are in place, LHP will publish information about the benefit schemes on its website/in its annual accounts/in its annual report to customers, including any eligibility criteria governing an individual's ability to participate in such schemes.

7.3 If LHP 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 colleagues and/or customers should be declared for the purposes of that contract award procedure.

7.4 In accordance with LHP's standing orders, policies and procedures for contracts and procurement no preferential treatment shall be given to any external organisation offering such a benefits scheme.

8. Ex gratia payments

8.1 No ex-gratia money payments (other than identified elsewhere within this Policy) may be made to colleagues without prior approval by the Chief Executive up to a limit of £200. Ex gratia payments over this limit or payable to Executive

Leadership Team or Board/Committee members shall be referred to Board for decision. Examples of ex gratia payments falling within this clause are claims for vandalism or damage to colleague vehicles or other possessions or similar losses caused by third parties because of work related issues.

9. Gifts made to colleagues by LHP

- 9.1 LHP may make a discretionary allowance of up to £50 per occasion for the purchase of gifts for colleagues, subject to the approval of the Executive Leadership Team (in the case of employees, agency staff, consultants, contractors, and volunteers) or the Chair of the Board (in the case of the Chief Executive or Board/Committee members and Board Trainees). Any allowances for the purchase of gifts are subject to an annual limit of £200 per colleague. Discretion should be used in judging the appropriate amount for a gift, subject to these overall limits.
- 9.2 Any allowance paid for the purchase of gifts which exceeds these limits must be approved by the Board. It is recognised that in respect of Board/Committee members, any gifts above these limits would be made in exceptional circumstances and only where it is appropriate and in the best interests of LHP to do so.
- 9.3 LHP may make a discretionary allowance of up to £300 per occasion for the purchase of gifts for employees, subject to the approval of the Board, where an employee is retiring from or leaving LHP following 10 or more years' continuous service.

10. Hospitality provided for colleagues by LHP

- 10.1 LHP may provide funding for hospitality at engagement events attended by colleagues. Any such funding may be provided up to a limit of £100 per colleague per event, within a total annual budget of £200 per colleague. Any events which would be classed as expenses for Board/Committee members and Board trainees shall be excluded from this budget.

11. Gifts and hospitality with third parties

- 11.1 All colleagues must comply with the provisions of the Bribery Act 2010. They must not offer give request or accept any gift or hospitality which could reasonably be regarded as amounting to either the offering, promising, or giving a bribe to another person, or the requesting, agreeing to receive or accepting of a bribe from another person. Further guidance on Bribery is set out in LHP's Code of Conduct and Anti-bribery policies.

Received from third parties

- 11.2 Colleagues 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.

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- 11.3 Colleagues should generally not receive (or offer) hospitality and gifts from or to persons or organisations who may be able to benefit from actions or decisions taken by LHP.
- 11.4 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.
- 11.5 Hospitality should only be accepted by colleagues (except contractors) where:
- it is incidental to the conduct of business or regarded as sustenance.
 - the event is in direct furtherance of LHP's business or linked to the sector; or
 - guests include parties other than colleagues.
- 11.6 Colleagues must not accept (or give) hospitality that is particularly lavish or disproportionate to the occasion. This includes hospitality with an estimated value of more than £100.
- 11.7 Colleagues must not accept (or offer) gifts or hospitality from organisations with which LHP is in dispute or where that organisation is taking part in, or is about to enter, an active tendering process for a contract with LHP.
- 11.8 Colleagues are responsible for declaring any hospitality or gifts that are offered or received from third parties where the value of the hospitality or gift exceeds £10, and any offers of gifts and hospitality which are declined. These will be recorded on a register of gifts and hospitality which may be reviewed by LHP's internal auditors and will be reported to the Audit and Risk Committee.
- 11.9 Any gifts or hospitality accepted which has only a nominal or estimated value of less than £10 need not be declared in LHP's register of hospitality and gifts, provided that these gifts and hospitality do not exceed an annual limit of £50 from one person or organisation to one colleague.
- 11.10 Colleagues may accept gifts up to a value of £25, if this does not exceed an annual limit of £50 from any one organisation or person.
- 11.11 Colleagues may accept, but not retain, any gifts with a value from £25 up to £50 where they deem it appropriate, and within the spirit of this Policy, to do so. Any such gifts should be notified to the Executive Leadership Team and recorded in the register of gifts and hospitality and should then be donated to charity/disposed of in an appropriate manner/returned to the donor as is considered the most appropriate course of action.
- 11.12 Colleagues should not accept gifts with a value of over £50 without specific Board approval with the reasons for acceptance or refusal being minuted.
- Provided to third parties**
- 11.13 Other than in exceptional circumstances, LHP will not provide hospitality or gifts to external organisations, other than hospitality with a value of up to £100 per

person per event per annum, such as catering for a lunch meeting, or commemorative gifts for a function, with a value not exceeding £25 per gift.

- 11.14 Any hospitality or gifts to be provided to external organisations with a cost to LHP of over £100 per person per event shall be approved by the Executive Leadership Team and with a cost to LHP of over £200 per person shall be approved by the Board.
- 11.15 The Governance team will maintain a register of gifts and hospitality provided by LHP to external organisations. This register will be audited annually by LHP's internal auditors, and a report given to the Audit and Risk Committee on the level of gifts and hospitality provided.

12. Housing Relevant Persons

- 12.1 LHP will only house people (which includes the award of starter and assured tenancies, and leases under shared ownership schemes) in accordance with its published allocations policy.
- 12.2 It is LHP's intention that 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. The relationship of the Relevant Person to the Group must be fully disclosed. The applicant must not have any involvement in the application process or in the management of the property.
- 12.3 Should a property be disposed on the open market, any decision to sell to a Relevant Person must be approved by the Board.
- 12.4 Any decision to allocate properties, re-house or transfer Board/Committee members, Board Trainees, or members of the Executive Leadership Team and/or their Close Relatives or Close Associations must be approved by the Board, and the interest of that Relevant Person must be disclosed.
- 12.5 Any decision to allocate properties, re-house, or transfer employees (other than members of the Executive Leadership Team) and/or their Close Relatives and Close Associations must be approved by the Chief Executive and the interest of that Relevant Person must be disclosed.
- 12.6 Any colleague:
- with an interest in; or
 - who has a close personal relationship with a Relevant Person whose application is being considered will declare that interest and discontinue any involvement they might have in that person's application.
- 12.7 A payment under an LHP Property Purchase Scheme may be made to Relevant Persons in accordance with LHP's published criteria for such schemes.

13. Employing Relevant Persons

- 13.1 LHP will carry out all recruitment processes in a way that is rigorous, transparent, and fair and in accordance with any recruitment policies of LHP.
- 13.2 LHP may offer employment to persons who are Close Relatives or Close Associations of LHP's colleagues only where it can be demonstrated they are the best candidate for the role.
- 13.3 Where the role is for a senior or executive post, the Board must first approve that decision.
- 13.4 LHP will not appoint any current or former (within the last 12 months) Board/Committee Members as an employee other than under an approved contract for services.
- 13.5 Where an applicant for a position of employment is a Close Relative of or has a Close Association to a colleague, this interest must be disclosed by that colleague.
- 13.6 Any colleague whose Close Relative or Close Association is applying for a position of employment will not be involved (either directly or indirectly) in the recruitment process for that post.

14. Payments to third parties

- 14.1 LHP may not make any payment to a company which is a current or former Board/ Committee Member or of which a director is a current or former Board/ Committee Member or a Close Relative of a current or former Board/ Committee Member unless:
- that payment is in respect of interest on capital lent to LHP or subscribed in its shares; or
 - such payment is documented in writing and the Board is satisfied that the payment is appropriate, reasonable and in the best interests of LHP.
- 14.2 For any other organisation of which a Relevant Person is a director, LHP 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 LHP, following consideration of all other potential contractors and is not paid or granted with the intention of obtaining or retaining business or a business advantage or to reward the provision or retention of business or a business advantage or in explicit or implicit exchange for favours or benefits. Any such payment or benefit must be approved by the Board and an entry made in the minutes of the Board meeting as to the Relevant Person and their interest in any company to which a payment is made or benefit given.
- 14.3 If payments are made to third parties, details of such payments must be properly recorded and receipted in accordance with LHP's Standing Orders and Financial Regulations. In making any such payments, consideration should be given to what these payments are for and whether they are reasonable and proportionate.

- 14.4 Individuals dealing with suppliers/contractors and business partners must make them aware that LHP takes bribery and corruption very seriously and that it will not be tolerated. No hospitality or gifts should be offered to any organisation for which LHP is tendering for a contract during the tender process.
- 14.5 When entering a contract with a new supplier/contractor, the appropriate level of due diligence must be undertaken (depending on the value and importance of the contract) all colleagues must satisfy themselves as to the supplier/contractors' identity and to ensure that they have appropriate anti-bribery policies in place. If unsure of the process to be followed guidance should be sought from the Governance Manager or Procurement Business Partner.
- 14.6 Colleagues must make sure that all contracts between LHP and third parties contain adequate provisions dealing with anti-bribery and anti-corruption, including the availability of remedies for LHP if an employee of the supplier/contractor is found to be involved in bribery.

15. Other payments and transactions

- 15.1 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.
- 15.2 Payments and benefits which arise out of a statutory provision or other similar enforceable right will be referred to the Chief Executive for approval. Examples of this would include home loss and disturbance payments and Right to Buy/Right to Acquire or compensation to settle a claim where on legal advice LHP has been negligent and would be likely to lose a claim in the courts. The approval of any such payments and benefits must fall within the financial limits set out in LHP's Compensation Policy.
- 15.3 Where LHP has surplus or unwanted items which it is unable to reasonably dispose of commercially, LHP may offer to dispose of those items to employees provided (a) the offer is available to all employees and (b) a reserve value is placed on the item which has been estimated by a competent person to be a reasonable value and (c) the item is either sold to the highest bidder over the reserve value or it is awarded to the successful employee by lot at the reserve value. A record of all such disposals shall be kept and reported annually to Audit and Risk Committee.

16. Declaring interests

- 16.1 Colleagues are responsible for declaring any interests which they hold relating to the areas covered by this or any other related LHP Policy. Colleagues are responsible for making sure the entries in the Register of Interests are kept up to date. All colleagues must make general declaration of interests at the point at which they become a colleague or at such other times as they are requested to do so by LHP. If any interests change or new interests are acquired, these should be declared as soon as they become known.

- 16.2 Any interests declared will be entered onto a Register of Interests (maintained by HR for employees and Governance for Board/Committee members and Board Trainees) which will be available for inspection by LHP's regulators and by people with a legitimate interest in LHP and its business from time to time.
- 16.3 The Code of Conduct sets out how it expects colleagues to manage conflicts of interests that arise from time to time. Colleagues must ensure that they are familiar with the Code of Conduct and that they follow it whenever a potential conflict situation arises.

17. Using discretion

- 17.1 From time to time the Probity Policy requires colleagues to use their discretion as to:
- whether an interest should be declared.
 - whether an interest that has been declared by someone else is relevant.
 - (where a particular decision is delegated) whether a particular payment or benefit or other matter covered by the Probity Policy should be permitted or not.
- 17.2 Whenever matters are left to discretion, the Probity Policy should be carefully considered to ensure that LHP is not placed in a difficult situation.
- 17.3 If help or support is required making a decision colleagues should speak with:
- Their line manager or the Chief Executive, Executive Director or Assistant Director of Governance and Regulation (if an Employee); or
 - The Chair of the Board (if a Board member).

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

18. Breaches of the Probity Policy

- 18.1 Any alleged breach of the Probity Policy will be investigated by LHP.
- 18.2 A breach of the Probity Policy by an employee will be treated as a disciplinary matter under their 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 LHP's relevant policies for such investigations.
- 18.3 A breach of the Probity Policy by a Board/Committee member or Board Trainee will be treated as a breach of their duties and obligations to LHP and their services agreement with LHP. An investigation into any allegation of such a breach made against a Board/Committee member or Board Trainee will be conducted in accordance with LHP's relevant policies for such investigations and an appropriate sanction may be applied.

EQUALITY IMPACT ASSESSMENT

Probity Policy			
Provide a summary of the aims and main activities of the initiative (bullet points):			
<ul style="list-style-type: none">• The conduct of individuals impacts directly on the public reputation of LHP and all involved with LHP must strive to conduct the business in ways that will maintain the good reputation of the sector.• This policy includes guidance on how all employees, Board and Committee members should act in relation to probity issues.			
Completed By:	Assistant Director of Governance and Regulation	Date:	11 March 2022

Guidelines: Things to consider

- Where a negative (i.e., adverse) impact is identified, it may be appropriate to make a full EIA (see Stage 2), or, as important, take prompt action to redress this – e.g., by abandoning or modifying the initiative. NB If the initiative contravenes equality legislation, it must be abandoned or modified.
- Where an initiative has a positive impact on groups/community relations, the EIA should make this explicit, to enable the outcomes to be monitored over its lifespan.
- Where there is a positive impact on groups, does this mean there could be an adverse impact on others, and if so, can this be justified? - e.g. Are there other existing or planned initiatives which redress this?
- It may not be possible to provide detailed answers to some of these questions at the start of the initiative. The EIA may identify a lack of relevant data, and that data-gathering is a specific action required to inform the initiative as it develops, and to form part of a continuing evaluation and review process.
- It is envisaged that it will be rare for full impact assessments to be required. Usually, where there are problems identified in the screening stage, it is envisaged that changing the approach at this stage, and/or setting up a monitoring/evaluation system to review a policy's impact over time will tackle the problem.

EQUALITY IMPACT ASSESSMENT

STAGE 1: SCREENING

This stage establishes whether a proposed initiative will have an impact from an equality perspective on any group of people or community – i.e., on the grounds of race, religion/faith/belief, gender (including transgender), sexual orientation, age, disability, or whether it is “equality neutral” (i.e., have no effect either positive or negative).

Q 1. Who will benefit from this initiative? Is there likely to be a positive impact on specific groups/communities (whether or not they are the intended beneficiaries), and if so, how? Or is it clear at this stage that it will be equality ‘neutral’ i.e., will have no effect on any group? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

It is expected that this policy will be equality neutral – as applies equally to all employees, Board and Committee Members.

Q 2. Is there likely to be an adverse impact on one or more minority/under-represented or community group as a result of this initiative? If so, who may be affected and why? Or is it clear at this stage that it will be equality ‘neutral’? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

It is expected that this policy will be equality neutral.

Q 3. Is there sufficient data on the target beneficiary groups/communities? Are any of these groups under or overrepresented? Do they have access to the same resources? What are your sources of data and are there any gaps? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

LHP collects diversity data on its employees, Board and Committee members and compares the diversity profile to the profile of the communities within which LHP serves (ONS data).

Q 4. Outsourced services – if the initiative is partly or provided by external organisations / agencies, please list any arrangements you plan to ensure that they promote equality and diversity. *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

NA

EQUALITY IMPACT ASSESSMENT

Q 5. Is the impact of the initiative (whether positive or negative) significant enough to warrant a full impact assessment – see guidance? If not, will there be monitoring and review to assess the level of impact over a period of time? *Please consider all aspects of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*

No

Q 6. To be completed at six monthly review Detail actions taken to assess the level of impact over a period of time, or to address any gaps in data. *Please consider all aspect of Diversity including as a minimum: Age, Disability, Gender/Transgender, Race/Ethnicity, Religion/Faith/Belief, Sexuality*