



**SHAREHOLDING MEMBERSHIP  
POLICY  
2025-2028**

## SHAREHOLDING MEMBERSHIP POLICY

<b>Adopted / Date Reviewed:</b>	Board 24 April 2018 / Reviewed 30 March 2022/ Reviewed June 2025
<b>Review Period:</b>	Three years
<b>Next Review:</b>	April 2028
<b>Contact Officer:</b>	Executive Director of Governance and Regulation
<b>Policy Version:</b>	Third
<b>Version Reviewed by:</b>	Executive Leadership Team – 12 May 2025
<b>Version Approved by:</b>	The Board – 05 June 2025
<b>Policy Links:</b>	The Rules Board and Committee member Recruitment and Succession policy

### Brief Policy Summary:

There is a constitutional requirement for LHP (Lincolnshire Housing Partnership) to agree and apply a policy on the admission of new Shareholders (Rule C8). The NHF (National Housing Federation) Code of Governance (2020) states that:

- The role of Shareholders in the governance of the organisation is documented and understood.
- Organisations with open shareholding publish their policy for the admission of Shareholders.

If there is any dispute or lack of clarity over the interpretation of the contents of this policy, the Rules will take precedence.

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## **Purpose**

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1. This policy is required to ensure LHP is compliant with its Rules, the NHF Code of Governance and relevant Regulatory Standards.

## **Scope**

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2. This policy applies to LHP current and future Shareholders only and governs admissions, exclusions, rights and obligations.
3. A Shareholder of LHP is a person or body whose name and address are entered in the Register of Shareholders.

## **The Role of the Shareholders**

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4. LHP's Shareholders shall always act in the interests of LHP and for the benefit of the community, as guardians of the objects as set out in Rule A2 of LHP's Rules.
5. LHP's Shareholders must agree to be bound by the obligations on them as set out in the Rules (Rule C1).
6. LHP's Shareholders also agree to act as ambassadors for LHP and promote its mission, objectives and achievements.
7. All Shareholders must use their best endeavours to participate in General Meetings and other events organised by LHP to which Shareholders are invited.
8. All Shareholders must not conduct themselves (at any time and under any circumstances) in a manner which could be regarded as bringing their position as a Shareholder or LHP into disrepute.
9. Shareholders have the right, in accordance with and subject to the Rules, to attend and vote at General Meetings. A General Meeting may be called for any purpose requiring a Shareholder resolution.

## **Admission to Shareholding Membership**

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10. In accordance with the Rules, all Board Members shall be admitted as Shareholders when they are appointed as a Board Member.
11. LHP will restrict the number of customers of LHP to a maximum of no more than 24% shareholding membership of the total at any time.
12. The names of those admitted will be entered into the Register of Shareholders, held by the Secretary, and each will be issued with a share (Rule C9). No Shareholder can hold more than one share (Rule C7).
13. Existing Shareholders appointed prior to the date of this policy may retain their Shareholding Membership of LHP until such time as it is ended in line with the Rules.

## **Shareholding Membership**

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14. The Board, in considering applications, shall admit all Board Members to Shareholding Membership.

15. Shareholding Membership shall cease automatically when a person ceases to be an LHP Board Member, or in the circumstances set out in Rule C12. In addition, shareholding may be terminated by the Board in accordance with the Rules if a Shareholder fails to comply with the obligations set out in this policy, including participation expectations and conduct requirements.
16. Shareholders are expected to actively participate in the governance of LHP. Where a Shareholder fails to attend, or sends apologies for, two consecutive General Meetings without reasonable cause, the Board reserves the right to review the individual's continued shareholding and may determine that their membership be terminated in accordance with the Rules.
17. Shareholders must not use their position to gain personal advantage and are expected to uphold the highest standards of integrity and accountability. They must disclose any actual or potential conflicts of interest.

# Lincolnshire Housing Partnership (LHP) Equality and Quality Impact Assessment (EQIA)

**Title of Policy/Event/Decision: Shareholding Membership Policy**

**Lead Officer(s): Corporate Head of Governance & Regulation**

**Date of EQIA: 07 May 2025**

Scope and Purpose	
<b>Briefly describe the policy/event/decision being assessed:</b>	This policy sets out the admission arrangements of new Shareholders (Rule C8). We are required to have such a policy to comply with the NHF (National Housing Federation) Code of Governance (2020) requirements.
<b>What is the aim or purpose of this policy/decision?</b>	To ensure the role of Shareholders in the governance of LHP is documented and understood.
<b>Which departments or groups will be affected by this policy/event/decision?</b>	LHP Board Non-Executive Directors (NED)
Data Collection and Evidence	
<b>What data or evidence have you used to identify how different groups may be affected? (e.g., tenant demographic data, service usage statistics, consultation feedback)</b>	<ul style="list-style-type: none"> <li>• EDI data return for Board (Shareholder) composition (as of March 2025)</li> <li>• Sector best practice (NHF Code of Governance)</li> <li>• Regulatory Expectations (RSH Standards)</li> </ul>
<b>What does this data tell you about the potential impacts on different equality groups?</b>	<p>The Shareholder composition shows relatively good gender balance but relatively low numbers of those that identify with a work limiting disability and caring responsibilities. There is a high proportion of those between 45-54 (37.5%) and over 55 (37.5%) with limited diversity in relation to race and religion.</p> <p>There is a risk that formal procedures may be perceived as intimidating or inaccessible for NEDs from underrepresented groups or with particular needs (e.g. neurodiverse NEDs, those with mental health concerns).</p>

## RAG Impact Assessment on Protected Characteristics

Use the RAG system to assess the level of potential impact for each protected characteristic:

- **Red (High Risk):** Significant potential for negative impact requiring immediate action to mitigate.
- **Amber (Medium Risk):** Some potential for negative impact, which can be mitigated with changes.
- **Green (Low or No Risk):** Little to no negative impact identified.

Ensure that you state reasons (the why) for your justifications.

Protected Characteristic	Impact (Positive, Negative, Neutral)	RAG Rating	Description of Potential Impact	Mitigation/ Enhancement Actions	Responsible Officer
Age	Neutral		Policy is role based, not age based. No age barriers identified	N/A	N/A
Disability	Potential Barrier		General Meetings may be inaccessible	Offer reasonable adjustments, use plain English and accessible formats	CHoGR
Gender Reassignment	Neutral		No direct impact identified	Maintain inclusive culture, use appropriate pronouns in meetings	CHoGR
Marriage and Civil Partnership	Neutral		No impact anticipated	N/A	N/A

Pregnancy and maternity	Potential exclusion		Risk of missed meetings or discomfort	Offer hybrid options, flexibility in scheduling	CHoGR
Race	Neutral		No impact anticipated	N/A	N/A
Religion or Belief	Potential barrier		No direct impact, but meeting scheduling must be sensitive	Avoid General Meetings during key religious observances	CHoGR
Sex	Neutral		No identified impact	N/A	N/A
Sexual Orientation	Neutral		No identified impact	N/A	N/A

## Mitigating Negative Impact

<b>What actions will you take to reduce or mitigate any identified negative impacts?</b>  Provide specific mitigation measures for each characteristic where a negative impact (Red or Amber rating) was identified.	Mitigation measures have been identified to ensure adjustments to accessibility are made where necessary.
<b>Who is responsible for implementing these actions?</b>	Corporate Head of Governance & Regulation

## Consultation and Engagement

<b>Have you consulted any stakeholders or equality groups? If so, who and how?</b>	EDI data return for Board/Shareholder composition (as of March 2025).  Executive Leadership Team and Board to review the whole policy.
<b>What feedback have you received, and how has this influenced your assessment?</b>	There has been no feedback on this policy.



## Decision Making

<b>How has this EQIA informed or influenced the final decision?</b>	<p>The EQIA helped ensure the policy included:</p> <ul style="list-style-type: none"> <li>• flexibility in meeting arrangements;</li> <li>• commitment to reasonable adjustments under the Equality Act 2010</li> </ul>
<b>Were any changes made to the policy/decision as a result of the EQIA?</b>	<p>Additional mitigations and enhancements to ensure the policy is inclusive were identified as part of impact assessment. Although no specific changes to the Policy, we will ensure:</p> <ul style="list-style-type: none"> <li>• reasonable adjustments are available for accessibility;</li> <li>• respectful and sensitive by using appropriate pronouns and avoidance of key religious observances; and</li> <li>• flexible options in scheduling to meet individual needs</li> </ul>

## Monitoring and Review

<b>How will you monitor the actual impact of the policy/decision once it is implemented?</b>	The Governance Team will monitor, via Board members/ Shareholders feedback on accessibility of meetings and other adjustment requests, to ensure inclusivity of participation in Shareholder and other Board meetings.
<b>When will the policy/ decision be reviewed?</b>	<p>June 2028.</p> <p>Interim reviews will occur if the regulatory framework or feedback indicates the need for amendment.</p>
<b>Sign-Off</b>  <b>EQIA Completed By:</b> <i>Lead Officer(s) Name(s):</i> <i>Date:</i>	<p>Jess Hyland</p> <p>05 May 2025</p>
<b>Approved By:</b> <i>Approval Name:</i> <i>Date:</i>	<p><i>Abigail Iyako</i></p> <p>13/05/2025</p>