

Probity Policy



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1. Introduction

- 1.1. Salix Homes is committed to achieving the highest standards of integrity, probity and good governance. We promote openness and transparency in all our activities. This policy covers:
- All Group companies, including shareholders;
 - Board Members and other committee members;
 - Colleagues (permanent, temporary, casual, and fixed term contracts); and
 - Other stakeholders including family members, business associates and other personal connections of the people named above.
- 1.2. Where legislation detailed in this policy does not directly apply to some members of the Group, they are expected to follow the spirit of this policy and abide by the same rules and principles.
- 1.3. Our Probity Policy has five main objectives:
1. To ensure we comply with Section 122 (Payments to members etc.) of the Housing and Regeneration Act 2008.
 2. To ensure that we comply with the requirements of our Regulator – the Regulator of Social Housing (RSH).
 3. To demonstrate that we follow best practice and the requirements of our adopted Codes of Governance and Conduct.
 4. To ensure compliance with the Economic Crime and Corporate Transparency Act 2023 (ECCTA) to prevent bribery and corporate economic crime.
 5. To make sure that we have the highest standard of corporate governance and corporate transparency across the Salix Homes Group.
- 1.4. Salix Homes and its subsidiaries have adopted Codes of Governance-and Conduct to ensure that best practice guidelines are followed in relation to our approach to openness, transparency and good governance and compliance with the Governance and Transparency, Influence & Accountability Standards.
- 1.5. Failure to follow our Probity Policy could have serious implications for Salix Homes and the wider sector, including:
- Exposure to legal action;
 - Regulatory action;
 - Reputational damage.
- 1.6. Failure to follow our Probity Policy could also have serious implications for individuals in that:
- Colleagues could be disciplined and dismissed for gross misconduct.
 - Board and Committee members could be personally liable to Salix Homes for any losses or liabilities it suffers as a result; or
 - Board and Committee members could be removed, disciplined or face legal action.

- 1.7. Everyone should make sure that they understand and follow every applicable aspect of the Probity Policy. Should this policy contradict any other aspect of Salix Homes objectives, this policy should always take precedent.
- 1.8. Any queries should be made to the Company Secretary. Should further clarification be required, our Internal Auditors or a similar source of external advice should be sought.

2. Definitions

2.1. The terms used in this Probity Policy have the following meanings:

Term	Description
Act	The Housing and Regeneration Act 2008
Benefit	This includes, but is not limited to: <ul style="list-style-type: none"> • Non-contractual gifts or benefits, • The granting of a loan, • Award of any type of commercial contract (e.g. Contract for services).
Board	The Board of Management and delegated committees of Salix Homes
Board Member	A member of the Board (including co-optees and independent committee members)
Bonus	A discretionary payment reflecting good performance under any contract
Company Secretary	Appointed to advise the Board on all governance matters. A role held by the Executive Director of Finance & Growth.
Governance team	The team appointed by the Executive Team to oversee the Probity Policy and monitor Officers' and employees' compliance with it from time to time
Constitution	The Rules and / or Memorandum / Articles of the companies within the Salix Homes Group
Employee / Colleague	A person employed by a member of the Salix Homes Group under a contract of employment
Executive Team	The Executive Management Team of Salix Homes, including the Chief Executive Officer and Executive Directors
Final	For the purposes of this Policy, a judgement, conviction, or refusal becomes final where: - <ol style="list-style-type: none"> (a) the period for bringing an appeal or further appeal has ended, or (b) an appeal is determined, abandoned, or otherwise ceases to have effect
Code of Conduct	The adopted Code of Conduct
Code of Governance	The adopted Code of Governance (currently the National Housing Federation Code 2020)
Member	Current and former members whose names are entered in the Salix Groups' register of members. Current members are also shareholders of Salix Homes.
Officer	A Board Member of Salix Homes or a member of any committee of Salix Homes
Regulatory Framework	The documents making up the Regulatory Framework for social housing in England from April 2015 and any subsequent updates as published by the Regulator of Social Housing (RSH).
Relevant Persons	Anyone with a close personal connection to an officer or employee which may present a risk that a decision or judgement could be influenced. Relevant persons include a close relative or someone with a close personal connection.

3. Payments, Gifts and Benefits

3.1. Payments and Gifts Made to Members by Salix Homes

3.1.1. Section 122 of the Act prohibits the making of gifts and payments of dividends and bonuses to:

- Members (shareholders) (or their families);
- former Members (or their families); or
- a company which has a person falling within the above as a director.

3.2.2 Exceptional circumstances to this restriction will be discussed by the Chair and CEO on a case by case basis.

3.2.3 If a payment is made in breach of these requirements, Salix Homes has the right under the Act to recover the wrongful gift or payment as a debt from the recipient. Where the provisions are contravened, Salix Homes may recover the wrongful gift or payment. The RSH may also direct Salix Homes to recover such a wrongful gift or payment.

3.2.4 The Regulator has previously indicated that it will not take such action where the gift is minor and uncontroversial - such as the provision of a leaving present for a Board Member, for example. Salix Homes considers 'small payments and benefits' to fall within this criterion as a token to recognise their support and services to the organisation. In the event of a Board member retiring from the Board, this may include flowers or a similar gift up to the value of £50.00, for example.

3.2. Payments to Officers

3.2.1. This section applies to any Officer of Salix Homes.

3.2.2. All payments will be made in line with the Board and Committee Member Remuneration and Expenses Policy.

3.3. Indemnities

3.3.1. Salix Homes may indemnify an Officer (or former Officer) against any expenses incurred by that Officer in connection with any civil or criminal proceedings in relation to Salix Homes, or any application for relief from liability for negligence, default, breach of duty or breach of trust in relation to Salix Homes.

3.4.2 Salix Homes may not indemnify an Officer (or former Officer) where:

- The Officer is convicted in criminal proceedings and the conviction is final;
- The court refuses (and that refusal is final); or
- That indemnity is in respect of any liability of the Officer to pay a fine imposed in criminal proceedings or a sum payable to a regulatory authority as a penalty for non-compliance with regulatory requirements

3.4. Payments to Employees

- 3.4.1. **Remuneration** – Salix Homes may make payments of remuneration to employees where such payments are due under a contract of employment or are otherwise made in accordance with this policy. We will make remuneration decisions transparently and fairly in accordance with our Rules and relevant policies.
- 3.4.2. **Benefits** – Salix Homes may only grant benefits of any description to an employee or employees where such benefits are permitted under their contract(s) of employment and are in accordance with this policy or are approved by the Board of Salix Homes (or relevant delegated committee).
- 3.4.3. **Bonuses** – Salix Homes may make bonus awards to an employee in accordance with the relevant employee’s contract of employment or any policy on bonus awards approved by the Board (or relevant delegated Committee).

Where a bonus award is proposed which is not in accordance with the employee’s contract of employment or an established bonus policy of Salix Homes, it must be approved by the Executive Team for colleagues or by the Board (or relevant delegated committee) if it relates to a member of the Executive Team. In deciding whether to approve such a bonus award, the Executive Team / Board (or relevant delegated committee) must consider doing so only on evidence of exceptional performance or in exceptional circumstances and in line with the spirit of this policy.

Any bonus awards will be made in accordance with comparable levels in the sector and having regard to our obligations as a Registered Provider of social housing.

- 3.4.4. **Reorganisation and Redundancy** – Salix Homes’ ‘Managing People Through Change’ Policy outlines payments that will be provided where colleagues are affected by changes to the structure of the organisation. Any payments proposed to be made in addition to those provided for the ‘Managing People Through Change’ Policy must be approved by the relevant delegated individual or body as outlined in the Policy.
- 3.4.5. **Settlement Agreements** - These can be used to resolve a dispute, a problem or to end employment. In deciding as to what is a reasonable and fair level of payment, the following considerations may 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;
 - Any relevant statutory formula;
 - Any published policies of Salix Homes;
 - 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 Salix Homes (either by making or not making a payment), including, in relation to out-of-court settlement payments for employment disputes, the claim's prospects of success, the potential legal costs of defending a matter and the effect on Salix Homes if a settlement is not made.

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

Salix Homes will exercise care to avoid any suggestion of secrecy or impropriety in cases where management failings and/ or poor performance or conduct of individual employees have resulted in the departure of the employee concerned.

Subject to the above, any non-contractual payment proposed to be made by Salix Homes to an employee must be approved by the Chief Executive Officer for employees who are not members of the Executive Team and by the Board or a properly authorised committee for members of the Executive Team.

- 3.4.6. **Benefit Schemes** - We may put in place or arrange to participate in benefit or discount schemes for our colleagues, customers, and / or Officers with external organisations, such as membership of recognised discount schemes for external retail and leisure organisations.

Where such benefit and discount schemes are in place, we will publish information about the benefit schemes on our intranet and website. Any discount schemes must be pre-approved by the Executive Team before implementation - including any eligibility criteria governing an individual's ability to participate in such schemes.

In the event of Salix Homes contemplating the award of a contract to an external organisation for the provision of a new benefit scheme, any colleague involved in the awarding of the contract itself should not accept any benefits during the procurement exercise and should declare any benefits offered at the earliest opportunity and ideally prior to the procurement exercise.

In accordance with our contracts and procurement regulations, no preferential treatment shall be given to any external organisation offering such a benefits scheme to our colleagues, customers, or Officers.

- 3.4.7. **Ex-Gratia (non-contractual) Payments** - No ex-gratia payments (other than those identified elsewhere within this policy) may be made to colleagues or Officers without the prior approval of the Board or the Remuneration & Governance Committee.

In exceptional circumstances and as a reward for excellent or long-standing service, ex-gratia payments may be made to colleagues or Officers, provided that any such payments do not exceed the amounts set by the Executive Team. Any ex-gratia payments to be made of this nature will be approved by the Executive Team.

3.4.8. **Gifts Made to Employees by Salix Homes** – Salix Homes may make a discretionary allowance of up to £50 per occasion for the purchase of gifts for employees, subject to the approval of the Executive Team or the Chair of the Board (in the case of members of the Executive Team). Further guidance is outlined in the associated Gifts and Hospitality Procedure.

3.4.9. **Social events for Officers and Colleagues** – Salix Homes may provide funding for social events for colleagues or Officers, such as retirement parties and colleague functions. Any such funding will be made in line with the annual budgetary constraints set out for such activities.

3.5. Gifts and Hospitality

3.5.1. The principles relating to the acceptance and provision of gifts and hospitality to colleagues and Officers within this policy are underpinned by the Seven Standards of Public Life as established by the Nolan Committee. In all instances, this policy requires colleagues, Officers, and the Executive Team to consider whether the gift or hospitality (whether being offered or received) is truly about the business and furthering our business.

3.5.2. Gifts and Hospitality Received from Third Parties

Officers and colleagues may be offered hospitality and gifts from external organisations or individuals. These may include gifts (e.g. pens, stationery etc.) or hospitality such as invitations to lunches and social events etc.

As a general guideline, Officers and colleagues should not accept or offer hospitality and gifts from or to persons or organisations that may be in an actual or perceived position to benefit from actions or decisions taken by Salix Homes.

Any known relationship to a person or organisation offering or being offered a gift of hospitality must be declared.

It is, however, recognised that 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. The process for accepting and declining of gifts and hospitality is outlined in the associated Gifts and Hospitality Procedure.

It is also recognised that in some instances, the extension of an invite to include a partner may be linked to the furtherance of the business. In these instances, approval must be sought in writing from the line manager before accepting and declaring the offer of hospitality.

3.5.3. Gifts and Hospitality Provided to Third Parties

Other than in exceptional circumstances, Salix Homes will not provide gifts or hospitality to external organisations. Any offers of gifts and/or hospitality should follow Salix Homes' Gifts and Hospitality Procedure.

3.5.4. The Gifts and Hospitality Register

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The Governance Team will, on behalf of Salix Homes, maintain a Register of Gifts and Hospitality accepted and declined by colleagues and Officers.

The Gifts & Hospitality Register will be included on the Public Register which is reported to the Board annually. The Register will be made available to the organisations' Internal and External Auditors as part of the planned programme of audits. Any issues that may arise associated with the register at any time during the year will be raised by the Governance Team to the Company Secretary for appropriate action, or the Chair of Board or Chair of the Audit & Risk Committee if this is more appropriate.

3.6. The Rehousing of Officers, Colleagues and Relevant Persons

- 3.6.1. Salix Homes will only house people in accordance with its published relevant allocation policies.
- 3.6.2. Relevant persons will receive equal treatment to all other applicants in the allocation of housing (including transfer and re-housing applications), and the consideration of an application made by a relevant person must be open, fair, and transparent.
- 3.6.3. All applications for housing within the Salford area are assessed and completed by Salford City Council's housing advice service known as SHOP (Salford Housing Options Point). All applicants are assessed based on their current housing need and registered onto Salford City Councils Choice Based Lettings (CBL) scheme also known as Locata. They will be placed into the relevant rehousing band.
- 3.6.4. A Re-housing Approval Form should be completed to approve the allocation of a home or transfer to a colleague (other than members of the Executive Team and Board Members) and/or any relevant person **before** the offer of rehousing is made. The interest/ relationship of that relevant person must be disclosed.
- 3.6.5. A Re-housing Approval Form for the allocation of a home to Officers or members of the Executive Team and / or any Relevant Persons must be approved in advance by the Board, and the interest/ relationship of that relevant person must be disclosed. The Officer or member of the Executive concerned would not be involved in any discussions or decision making regarding the approval.
- 3.6.6. For clarity, no offer of re-housing should be made without the relevant approval of the offer being confirmed.
- 3.6.7. All completed and approved forms and copies of emails will be kept on the Public Register for inspection by the Regulator, Internal / External Audit, or other relevant organisations/ persons. A report will be made annually to the Board detailing any approvals made to re-house a relevant person.
- 3.6.8. Any colleague or Officer with an interest in, or who has a close personal relationship with a relevant person whose application is being considered, is

expected to declare that interest at the earliest opportunity and discontinue any involvement they might have in that person’s application.

3.6.9. After rehousing, Salix Homes will ensure that matters such as repairs and maintenance, rent arrears, anti-social behaviour complaints and other housing management issues are dealt with openly and fairly - avoiding any action that appears to favour the relevant person. In addition, if the relevant person is an employee or someone closely connected/related to an employee, then the employee will not have any personal involvement in the day-to-day operational management of the tenancy.

3.7. The Offering of a Shared Ownership Home to Officers, Colleagues and Relevant Persons

3.7.1. Salix Homes will only approve the offer of a Shared Ownership home to people in accordance with our published policies. Relevant persons will receive equal treatment to all other applicants in the allocation of Shared Ownership (or similar) housing. The consideration of an application made by a relevant person must be open, fair, and transparent.

3.7.2. An Approval Form to offer a shared ownership (or similar) property to a colleague, Officer or relevant person should be completed and correctly approved in advance of an offer being made. The interest of that relevant person must be disclosed.

3.7.3. For clarity, no offer of a Shared Ownership home (or similar) should be made to a colleague, a close relative or relevant person of a colleague without the relevant approval of the offer being confirmed.

3.7.4. All completed and approved forms and copies of emails will be kept on the Public Register for inspection by the Regulator, Internal / External Audit, or other relevant organisations/ persons. A report will be made annually to the Board detailing any approvals for Shared Ownership homes made to a relevant person.

3.7.5. Any colleague or Officer with an interest in, or who has a close personal relationship with a relevant person whose application is being considered, is expected to declare that interest at the earliest opportunity and discontinue any involvement they might have in that person’s application.

3.7.6. After rehousing, Salix Homes will ensure that any tenancy, property or estate management related matters are dealt with openly and fairly avoiding any action that appears to favour the relevant person. In addition, if the relevant person is an employee or someone ‘closely connected’/related to an employee, then the employee will not have any personal involvement in the day-to-day operational management of that property.

3.8. The Employment of Officers, their Close Relatives and Relevant Persons

3.8.1. We will carry out all recruitment in a way that is rigorous, transparent, and fair and in accordance with our Recruitment and Selection Policy.

- 3.8.2. We may offer employment to relevant persons (i.e. close relatives or anyone with a known connection to our colleagues (permanent or temporary) or Officers where it can be demonstrated they are the best candidate for the role. In all cases, the relationship must be disclosed by the applicant and the employee/ Officer as soon as possible.
- 3.8.3. We will take steps to ensure that where there are connections to any colleague or Officer, that this person will not be involved (either directly or indirectly) in the recruitment process for that post.
- 3.8.4. Where the potential employment of relevant persons is for a senior or Executive post, or where the candidate is related to an Officer of Salix Homes, approval by the Remuneration & Governance Committee will be required in advance before an offer of employment is made.
- 3.8.5. An applicant would be considered for a post which is directly accountable to an employee with whom they have declared an interest if appropriate measures can be put in place to ensure full transparency.
- 3.8.6. We may offer a contract of employment to a former colleague where it can be demonstrated they are the best candidate for the role.
- 3.8.7. We may offer employment to customers of Salix Homes where it can be demonstrated that they are the best candidate for the role. In all cases, the relationship with Salix Homes must be declared by the applicant at the point of application.
- 3.8.8. An Employment Approval Form must be completed and appropriately approved prior to any offer of employment and filed on the Public Register. No offer of employment should be made in advance of the approval.
- 3.8.9. A report will be provided to the Board detailing any approvals for employment of Relevant Persons on an annual basis.
- 3.8.10. In those instances where a customer is appointed as an employee or during their employment, they become a customer, the activities of the role will be reviewed in relation to access to data, information and systems to ensure that relevant data protection implications and legislation are adhered to. Additional guidance for employees who are tenants will be provided.
- 3.8.11. Where, post-employment, a close personal relationship develops between Officers or employees, the relationship must be declared to the Company Secretary who will consider whether a conflict of interest exists. Where a conflict is identified, steps will be taken to provide appropriate measures to one or other party to ensure any potential for conflict is minimised. These will be clearly documented and retained by People Services.

3.9. Executive Members (including other employees)

- 3.9.1. It is recognised that there may be instances where a member of the Executive team may be appointed to the Board or other committee of Salix Homes during the course of their employment.
- 3.9.2. In these instances, and to ensure absolute clarity regarding their role as an Officer and as an employee, specific detail to identify those matters where they should not participate in any debate, decision making or be required to leave a meeting will be provided and agreed in advance. This detail will be determined according to the specific job role and the committee.
- 3.9.3. This will be monitored by the Chair of the Board/ relevant committee and the Company Secretary.
- 3.9.4. In line with section D7.9 of the Rules, any Board or committee member who is also an employee of the organisation cannot remain a member if their contract of employment is terminated or ends.

3.10. Employment of Board/ Committee Members

- 3.10.1. It is recognised that there may be instances where an Officer may consider applying for a paid role as an employee within Salix Homes.
- 3.10.2. Whilst this is not prohibited by the Rules, any application for employment will only be considered where it can be demonstrated they are the best candidate for the role. In all instances the candidate must disclose their connection to Salix Homes as soon as possible.
- 3.10.3. It is expected that an Officer would discuss their intentions to apply for employment with the organisation with the Chair in advance of any application being submitted.
- 3.10.4. Should they be successful in their application, and prior to a position being offered, the final determination would rest with the Chair – including identifying any conditions for managing any conflict.
- 3.10.5. In the event that an Officer of Salix Homes applies for a paid role within the organisation, it is expected that they would fully consider any potential conflicts and the appropriateness of their continued membership of the Board/ committee. This consideration should reflect the principles and spirit of this policy.

3.11. Use of Salix Homes Contractors, Consultants and Suppliers

- 3.11.1. Use of Salix Homes Contractors / Consultants and Suppliers for work / services conducted in a private capacity for colleagues, relevant persons (as defined in this policy) of colleagues, or Officers of Salix Homes is not allowed. This includes the use of individual Salix Homes colleagues or Officers (or any other Group Company colleagues or Officers) for work in a personal capacity.

3.11.2. Exceptions to this rule apply where it would be difficult to avoid a Salix Homes supplier, such as a national high street supplier (e.g. B&Q, Travis Perkins, Amazon), although this exception does not entitle any colleague or Officer to gain any benefit from their connection to Salix Homes, such as gaining access to any discounts negotiated by Salix Homes with such suppliers.

3.11.3. Colleagues with access to business trade cards, such as “P” Cards, Costco, or access to business accounts such as Amazon Prime etc. to purchase items for Salix Homes, must not use these to buy any personal items.

3.11.4. Colleagues and Officers should contact either the Governance Team, a member of the Procurement Team, or the Company Secretary if they have any queries about this policy, or would like to check Salix Homes’ suppliers, contractors or contractors.

3.12. Payments to Third Parties

3.12.1. Salix Homes may not make any payment to a company of which a director is a member, a former member, or a close relative of a member or former member unless:

- That payment is in respect of interest on capital lent to Salix Homes; or
- That company is a subsidiary or associate of Salix Homes.

3.12.2. For any other organisation of which a relevant person is a director or member, Salix Homes 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 Salix Homes, following consideration of all other potential contractors.

3.12.3. Any payment or benefit must be approved by the Executive Team.

3.13. Other Payments

3.13.1. Any payment made or benefits granted to relevant persons which are not set out as approved within this policy must be approved in advance by the Board or delegated committee of the Board.

4. Anti Bribery and Corporate Transparency

4.1. In line with the Bribery Act 2010 and Economic Crime and Corporate Transparency Act (ECCTA) 2023, Salix Homes takes its responsibilities in relation to bribery and corporate transparency very seriously.

4.2. Any form of bribery, regardless of the value, whether direct or indirect and by or for Salix Homes is not allowed. Actual bribery does not have to take place. An indication that bribery has been offered / accepted has consequences under the Act.

4.3. This applies to all colleagues and Officers of the Salix Homes Group and people associated with the Salix Homes Group who could be seen to be undertaking work on

our behalf e.g. a repairs sub-contractor. A breach of the Act by colleagues or Officers of Salix Homes holds serious consequences.

- 4.4. Members, Officers and/ or colleagues should refer to the Anti-Fraud & Anti-Money Laundering Policy for more detail on Salix Homes' stance in relation to Bribery.
- 4.5. A record of actual or attempted bribery will be maintained by the Governance Team – with any reports of bribery being reported immediately to the Chair of the Board and Chair of the Audit & Risk Committee.
- 4.6. Any allegations of bribery will be investigated and, if upheld, will be dealt with appropriately in line with our contracts of employment. We will terminate any contracts with third parties where the allegations have been upheld or in the event of actual prosecutions under the Act.
- 4.7. Salix Homes will ensure that all Officers and colleagues are aware of their responsibilities regarding the prevention of fraud under ECCTA. Directors associated with the Salix Homes Group will be required to complete relevant validations prior to, and as part of their ongoing association with any subsidiary organisation within the Group.

5. Declaring Interests

- 5.1. This policy requires Officers, colleagues, and Customer Committee Members to declare any actual or potential interests relating to the elements contained within this policy or which may conflict with the duties of their role at the earliest opportunity e.g. as and when the interest arises and at the beginning of all committee meetings. This declaration protects both the organisation and its Officers, colleagues and Customer Committee Members.
- 5.2. Everyone must make a general declaration of interest at the point they become employees or Officers or at other times as requested to do so by the Governance Team, in accordance with the Declaration of Interest Procedure.
- 5.3. An interest can be described as:
 - Where an Officer, Customer Committee Member or colleague has a known relationship (e.g. partner; spouse, a close family relative or other personal connection such as a friend) with someone employed by Salix Homes to carry out work or services on our behalf such as a consultant, contractor or supplier;
 - Where an Officer or colleague has a known relationship with a customer or potential customer; or
 - An Officer, Customer Committee Member or colleague is personally involved in a business or organisation employed to carry out work or services on our behalf e.g. a Director of a consultancy service or is linked to a voluntary organisation or statutory body.
- 5.4. Any interests declared will be entered onto a Register of Interests (known as the Public Register) in accordance with the Declaration of interest Procedure, which is maintained by the Governance Team. Details of the declarations of interest will be reported annually

to the Board. Any information provided will be held and processed in accordance with Salix Homes Data Protection Policy.

- 5.5. For clarity, the annual Declaration of Interest process is separate from, and in addition to, requirements for recording a conflict of interest declaration during procurement exercises.
- 5.6. The Register will be available for review by the RSH and those with a legitimate interest in Salix Homes and its business on request. Each request will be considered on a case-by-case basis.
- 5.7. We view any breaches of this policy in relation to a situation where an individual should have informed Salix Homes of declaring an interest but didn't, very seriously. Failure to make an appropriate declaration, or submission of a false declaration may result in disciplinary action.

6. Using Discretion

- 6.1. This policy requires us to use discretion as to:
 - Whether an interest needs to be declared;
 - Whether an interest that has been declared by someone else is relevant;
 - (Where a decision is delegated to Salix Homes to make) whether a payment or benefit or other matter covered by this policy should be permitted or not.
- 6.2. Whenever matters are left to discretion, we will consider our decision very carefully to make sure there is no breach of this policy or that we are not placed in a difficult situation. If a colleague / Officer needs help or support deciding about anything to do with this policy, they should speak with:
 - Their line manager;
 - The Governance Team;
 - Any member of the Executive team; or
 - The Chair of the Board or the Company Secretary (if they are an Officer).

7. Delegations

- 7.1. Where the Board has delegated authority to a committee to make decisions about any matter contained within this policy, it must ensure that such delegation is clear, and the committee is of an appropriate size and formality in terms of meetings and record keeping.

8. Breaches of the Probity Policy

- 8.1. Any alleged breach of this policy will be investigated by Salix Homes or by an appointed organisation on Salix Homes behalf e.g. our Internal Auditors.
- 8.2. Any persons wanting to report suspected breaches of this policy should raise this with the Governance Team or their Line Manager. If either of these people is not appropriate,

the person should approach the Company Secretary or refer to the Whistleblowing Policy for further instruction and advice.

- 8.3. A breach of this policy by a colleague will be treated as a disciplinary matter under their contract of employment. Any investigation will be conducted in accordance with the relevant Salix Homes policy and may result in dismissal in cases of gross misconduct.
- 8.4. A breach of this policy by an Officer will be treated as a breach of his or her duties and obligations to Salix Homes. An investigation and sanctions will be in accordance with Salix Homes relevant policies.

9. Monitoring

- 9.1. The Governance Team will retain oversight of the implementation of this policy, supported by Managers and the Senior Leadership Team in relation to review and completion of declaration of interests, employment and rehousing applications, gifts and hospitality etc.
- 9.2. A summary of the Public Register will be provided to the Board on an annual basis.
- 9.3. The Public Register is available for review, on request. This is noted on the Associations' website.

10. Roles / Responsibility

- 10.1. The Board has ultimate responsibility for making sure that our policies and procedures maintain the high standards of probity and integrity expected by the sector.
- 10.2. Individual Board and committee members are responsible for following the requirements of the policy.
- 10.3. The Chief Executive Officer, Executive team and Senior Leadership Team are responsible for ensuring that all Officers and colleagues are aware of the purpose and requirements of this policy and that the policy is being followed at all times.
- 10.4. All colleagues are responsible for following the requirements of this policy.

11. Legal / Regulatory Links

- 11.1. This policy relates to the following:
 - Housing and Regeneration Act 2008 (section 122)
 - Bribery Act 2010
 - Fraud Act 2006
 - Criminal Finances Act 2017 incorporating Proceeds of Crime Act 2010
 - Anti-Money Laundering, Terrorist financing and Transfer of Funds Regulations 2017
 - Economic Crime and Corporate Transparency Act 2023
 - Governance and Financial Viability Standard
 - Salix Homes' adopted Codes of Governance and Conduct

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12. Equality, Diversity and Inclusion

- 12.1. Salix Homes is committed to promoting and embedding a culture of equality, diversity and inclusion (EDI) within our workplaces and the communities we serve:
- Equality is about ensuring that every individual has an opportunity to make the most of their lives and talents;
 - Diversity is recognising difference and responding positively to those differences;
 - Inclusion is about creating an environment where our services and employment opportunities are accessible to all.
- 12.2. We are committed to meeting our obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. We will consider all the protected characteristics of the Act which are:
- Age
 - Disability
 - Gender reassignment
 - Marriage and civil partnership
 - Race
 - Religion or belief
 - Sex
 - Sexual orientation
 - Pregnancy and maternity
- 12.3. We also recognise that Socio-economic background is an area where inequalities exist and commit to addressing this disadvantage and inequality in our communities where able to do so.
- 12.4. We are also mindful of our duties under the Public Sector Equality Duty, which is to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 12.5. Where reasonable to do so, Salix Homes will make any reasonable adjustment to ensure compliance with the Act.

13. Related Documents

- 13.1. This Policy should be read in conjunction with/ and or links to the following documents:
- Anti-Fraud and Anti-Money Laundering Policy
 - Tenancy Fraud Policy
 - Whistleblowing Policy and Procedure
 - Lettings Policy and Procedure

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- Recruitment and Selection Policy
- Procurement Policy
- Statement of Particulars
- Board/Committee Member Agreement for Services
- Board and Committee Member Remuneration and Expenses Policy
- Declaration of Interests Procedure
- Gifts and Hospitality Procedure
- Public Register

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