

CUNNINGHAME HOUSING ASSOCIATION LTD

EQUALITY IMPACT ASSESSMENT FORM

1. Information	
Document/Policy/ Strategy being created or updated	Entitlements, Payments and Benefits Policy
Purpose of creation or update / Executive Summary:	The policy sets out how entitlements, payments and benefits are managed across the Cunninghame Group. It supports transparency, integrity, accountability and compliance, and applies to Board members, staff, volunteers and connected individuals. It covers permitted and non-permitted payments, benefits, gifts, hospitality, contractors, declarations, connected persons, approvals and records to prevent improper, or perceived improper, benefit.
2. Protected Characteristics	
	Commentary on impact. Positive/neutral/negative as well as mitigations
Age	Neutral impact. The policy applies consistently regardless of age, with entitlements linked to role, contract, governance status or regulatory requirements. No adverse age-related impact has been identified.
Disability	Neutral to positive impact. The policy does not restrict legitimate entitlements, payments or benefits for disabled people. It recognises that approved and properly recorded adaptations may be required, supporting fairness and transparency and helping prevent disadvantage. Mitigation is provided through existing adaptations, allocations, employment, expenses and equality policies.
Gender identity/ reassignment	Neutral impact. The policy applies equally regardless of gender identity or reassignment, with decisions based on role, entitlement, declarations, conflicts and regulatory compliance. No negative impact has been identified.
Marriage/civil partnership	Neutral impact. The policy considers partners, household members, relatives and close connections only where interests or perceived conflicts may arise. This is proportionate, applies to all relationship types, and relates to managing conflicts rather than marital or civil partnership status.
Pregnancy/ maternity	Neutral impact. The policy creates no barrier for pregnancy or maternity leave. Contractual entitlements remain permitted where supported by contract, statute, policy or approved agreement. No negative impact has been identified.

Religion or Belief	Neutral impact. The policy applies consistently regardless of religion or belief. Requirements for gifts, hospitality, declarations, connected persons and conflicts are based on governance and regulatory considerations. No adverse impact has been identified.		
Race	Neutral impact. The policy applies equally regardless of race, nationality or ethnic background and supports transparent, consistent decisions. No negative racial impact has been identified.		
Sex/Gender	Neutral impact. The policy applies equally regardless of sex or gender, with entitlements based on role, contract, policy, statute, governance rules and regulatory requirements. No adverse gender-related impact has been identified.		
Sexual Orientation	Neutral impact. The policy applies equally regardless of sexual orientation. References to partners, relatives, household members, friends and connected people are inclusive and used only to identify and manage actual or perceived conflicts. No negative impact has been identified.		
Children’s Rights	Neutral to positive impact. The policy does not directly regulate children’s services but promotes transparency, fairness and proper management of interests in decisions affecting households, tenants, service users and connected people. It also recognises children’s rights under the United Nations Convention on the Rights of the Child. No adverse impact has been identified.		
Other	Neutral to positive impact. The policy strengthens governance, accountability, openness and fairness through clear rules on interests, connected persons, improper benefits and permitted entitlements. Mitigation is provided through the Register of Interests, approvals, Board reporting, related policies and regular review.		
3. Sign Off			
Lead Assessor:	Governance & Assurance Manager		
Co- Assessor:			
Date initiated:	25/06/2026		
Consultation:	The policy is based on the SFHA Model Entitlements, Payments and Benefits Policy and reflects regulatory requirements confirmed by the Scottish Housing Regulator. The policy information section also records consultation with SFHA.		
Research:	Assessment informed by the policy content, including its legal and regulatory framework, equality, diversity and inclusion section, children’s rights statement, Register of Interests requirements, conflicts of interest arrangements, related policies and Board reporting arrangements.		
Signature:	E Nimmo	Date:	25/06/2026

