



Staff Remuneration Policy

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Approval body	Executive Team
Date of approval	27 September 2022
Review Year	October 2025
Customer engagement required	No
Trade union engagement required	Yes - For Consultation
Equality Impact Assessment	No

1. INTRODUCTION

1.1 The purpose of this policy is to set out the principles which govern the way Wheatley Homes South Limited (WHS) remunerates its employees.

1.2 This policy covers the principles for staff remuneration, ensuring remuneration packages are competitive and affordable, and responsibility for setting and reviewing remuneration and additional benefits.

2. SCOPE

2.1 The Staff Remuneration Policy applies to all employees at WHS including Head of Service level posts.

2.2 There is a separate Executive Remuneration Policy which details WHS's approach to remunerating the Executive Management Team (EMT).

2.3 'Remuneration' refers to the salaries, car allowances, terms and conditions and any other benefits provided to staff.

2.4 The scope of this policy is subject to relevant change, depending on business circumstances.

2.5 This policy has been agreed by the EMT and the Board.

3. BASIC PRINCIPLES

3.1 WHS believes that:

- WHS is committed to ensuring a transparent and fair framework for managing and reviewing staff remuneration.
- Remuneration should be applied in a way that is fair and transparent.
- Remuneration should be competitive, but also cost effective.
- Governance and financial management should be applied to the matter of remuneration.
- WHS is an equal opportunities employer and ensures fair treatment to all employees.
- Staff pay and benefits should be reviewed and benchmarked on a regular basis.
- In setting staff remuneration WHS will take into account any regulatory guidance or legal requirements as required at that time.
- The Staff Remuneration Policy should be reviewed and amended in line with the policy review date.
- No Individual will be involved in setting the level of remuneration for their own post.

4. **RESPONSIBILITIES**

4.1 Responsibilities for reviewing and approving staff remuneration will sit with the EMT.

4.2 The Executive Management Team's responsibilities include, but are not to be limited to:

- Working in line with the remits of this Policy
- Resolving any remuneration issues as quickly and efficiently as possible.
- Ensuring that remuneration provided to staff is fair and implemented in line with other remuneration related policies (e.g., job evaluation).
- Ensuring that staff remuneration is fair and transparent.
- Reviewing staff remuneration to ensure it is in line with market rates (as outlined in clauses 5.3 and 5.4).
- Approving pay grades for temporary posts.
- Working with the Board of WHS to approve and review cost of living allowance increases.
- To provide relevant benefits as part of the wider remuneration package.

4.3 The Board's responsibilities include, but will not be limited to:

- Approving the overall Staff Remuneration policy.
- Reviewing and approving annual cost of living awards.
- Approving and reviewing pay grades for new staff posts.
- 4.4 The employees' responsibilities may include, but will not be limited to:
- Complying with and fulfilling any duties associated with the review processes related to remuneration and salary.
- Being aware that remuneration and salary can be a sensitive issue and therefore only discussing it with colleagues for the purposes of fair pay.
- Raising issues regarding remuneration in the first case with the line manager.
- Where not appropriate to raise remuneration issues within the department, to seek advice from the Human Resources Department.
- As a last resort, to raise remuneration issues via the Grievance Policy or Group Whistleblowing policy.

5. POLICY

5.2. Approach to Remuneration

WHS is keen to ensure that its employees are remunerated at a level which:

- Is appropriate to the wider economic and commercial environment.
- Considers both the market rate for comparable roles and the internal value of posts (determined through job evaluation) to the organisation.
- Provides similar roles with comparable rates of remuneration.
- Considers the performance of the individual and organisation as a whole.
- Models the values and behaviours of WHS.

5.3. Pay Structure

For staff WHS's pay structure includes:

• An incremental pay structure that is based on the Convention of Scottish Local Authorities pay grades – the majority of staff level posts are aligned to this structure. It is referred to as the COSLA (Convention

of Local Scottish Authorities) Pay Structure.

For Heads of Service and EMT level posts a structure of Spot Salaries is followed to appoint individuals to these. These Spot Salaries may be in the COSLA Chief Officer scale but will not be subject to incremental progression.

Setting salaries for posts - job evaluation and benchmarking

- 5.3.1 WHS's approach to setting salaries for all staff level posts on the COSLA pay grades includes the following steps:
- Use of a factor-based Job Evaluation scheme to assess all roles in the organisation. Based on the output of the evaluation exercise, individual roles are allocated to salary bands which include posts with a similar job evaluation score.
- To ensure salary bands remain in line with the market, WHS also completes regular benchmarking exercises to determine market rates for posts. Based on the output of the market benchmarking exercise adjustments are made to the values of salary bands included in the structure. Further details on the benchmarking exercise are detailed below.
- Any adjustments to salary bands need to be approved by the Board and are costed to ensure that the structure remains affordable.

WHS's approach to setting salaries for Head of Service posts on the spot salary structure includes:

- Use of a factor-based Job Evaluation scheme to each Head of Service role and allocate them to a suitable spot salary on the salary structure.
- Comparison against market benchmarking information to ensure salaries remain in line with the market.

This approach ensures that WHS operates a salary structure which adheres to relevant Equal Pay legislation and remains competitive against the market.

Please see the full Job Evaluation Policy and supporting documents for further information on WHS's job evaluation process.

5.3.2 Where a new permanent post is created it will be evaluated under the same Job Evaluation scheme used for all posts. The output of the Job Evaluation exercise will determine which salary band the new post is allocated to. The JE process must be completed, agreed by EMT, and have Board approval before the recruitment process starts.

5.3.3 Only in exceptional circumstances will WHS complete a re-evaluation of an existing role. These circumstances may include:

- Where the breadth of an individual post has been significantly extended/reduced.
- Where the responsibilities of an individual post have been significantly increased/decreased.
- Where a restructure is being developed or implemented.

Although individual staff members are able to request that their post is reevaluated, it is the responsibility of the EMT to determine whether the evaluation should be completed and whether any changes to the salary for the role should be implemented.

5.4. External benchmarking

A salary benchmarking exercise for all posts will take place at least every five years. This is a separate review to the annual cost of living award process and is designed to ensure that remuneration maintains competitive against the chosen benchmark position. Findings from the independent benchmarking exercise will be reported to the Board.

It is also important to define what market WHS operates in for salary benchmarking purposes. This will ensure that WHS is benchmarking against key peer group organisations, and those which it is most likely to either attract staff from or lose staff to. Some key points for determining an appropriate benchmark group of comparators include:

- As a housing association, the primary sector for benchmarking EMT salaries will be other housing associations
- Size and complexity of organisations should also be taken into account. As there are few direct comparators to WHS in the Scottish housing sector, this may mean extending research to include similar housing associations in Northern England
- Posts will be benchmarked against comparable posts (i.e., similar range of functional responsibilities, professional expertise, education requirements and operating at the same level within the organisation etc.) in organisations included in the benchmarking group.

When completing any benchmarking exercises, details on the comparison group used to determine the market figures will be included in the reporting.

There may be specific instances where deviation from these areas is required (e.g., unusual posts). Where this is the case, information on the sample should be included in any reporting.

5.5. Annual Salary Review

WHS usually adopts the COSLA agreement when determining annual cost of living awards. This is applied to both the COSLA Pay Structure (i.e., staff) and the Spot Salaries structure (i.e., EMT and Heads of Service).

Each year a report will be prepared by the Director of Finance for the Board seeking approval for the COSLA agreed increase for all staff up to and including Heads of Service. The Chief Executive will prepare a report for the Board seeking approval for the COSLA agreed increase for the EMT.

Under normal circumstance there is an additional incremental increase for the COSLA Pay Structure per annum. This will occur until an employee reaches the top of their pay grade. However, under circumstances where an individual's performance is unsatisfactory, WHS may choose to withhold the automatic progression for that individual. Further details are provided below.

5.6. Salary progression

New staff are typically appointed to the bottom of the agreed salary grade for their post. There is the opportunity for staff to progress up each spinal point within the grade on an annual basis until they reach the top of the salary grade. This is a separate award to the annual cost of living award and is subject to satisfactory performance. The Chief Executive must authorise any member of staff being placed on a different spinal point than the bottom after the submission of a business case by the recruiting manager.

WHS may however at times choose to withhold annual increments for individual staff. This will typically be in circumstances where an individual employee's performance is unsatisfactory or where an individual is involved in other misconduct issues. Where the withholding of an increment is due to performance issues, this will typically be identified during the appraisal process, but also during normal performance management activities completed throughout the year. Where issues of capability and misconduct arise, managers should follow the procedure outlined in the Disciplinary Policy.

The increments of any employee may be accelerated within the appropriate salary scale on the grounds of special merit, performance, or ability. Any acceleration must be recommended by the relevant Director and approved by the Chief Executive. The Director and Chief Executive must document any acceleration and certify that any increases in costs can be kept within the budgets set out in the business plan.

New members of staff will not be awarded an increment until they have passed their probationary period as per the probation policy. If the probationary period is extended, the award of any increment will be suspended and only implemented on successful completion of the probationary period (the award will not be backdated).

New Staff starting in April–September get an increment in the April of the year after they start; people starting October to March get an increment after they have worked 6 months.

There is no automatic progression for Head of Service posts.

5.7. Temporary Posts

EMT may create temporary posts when a business need is demonstrated. The Chief Executive has the authority to appoint to temporary posts for up to 12 months, and to set the salary for such posts.

5.8. Higher Paid Duties

Temporary promotions, secondments and acting up allowances must be approved by the Chief Executive. Such arrangements are permitted for a maximum of six months, unless required to cover for maternity leave or a career break, when a maximum of one year is permitted.

5.9. Market Supplements

The salary for a staff vacancy may sometimes not attract a suitable candidate due to market shortages and supply and demand issues. Where this is the case, the Chief Executive may recommend to the Board to award a market supplement in order to appoint successfully to that vacancy.

If a market supplement is considered necessary, then a separate business case to justify the market supplement with associated evidence will be produced to act as an audit trail for decision making and as a part of the report presented to the Board.

5.10. Car Allowance

WHS offers a car allowance benefit and petrol allowance based on the amount of miles travelled per annum. This scheme is subject to change at the organisation's discretion. Please refer to the Car Allowance Policy for further details of the benefit and criteria for eligibility

5.11. Additional Benefits

WHS provides a range of additional benefits available to its employees as part of their wider remuneration package. These benefits will be in line with the contracts of employment for each individual and the benefit packages provided to WHS employees.

5.12. Equality and diversity

The organisation places a strong emphasis on fairness and transparency in remuneration. WHS will ensure that its employees are treated fairly and consistently, in line with the Group Equality, Diversity and Human Rights Policy and in accordance with the Equality Act 2010.

Any concerns about remuneration should be raised immediately to your line manager. Where this is not considered appropriate, then please refer to the WHS Grievance Policy.

5.13. Appeal Process

Should a member of staff wish to appeal against the decision that the Executive Management team has made in terms of remuneration, then they must appeal in writing, stating the grounds for appeal for consideration by the members of the Executive team. The process will follow the standard appeals process used for other appeals.

Where a contested remuneration level results from job evaluation, the appeals process in the Job Evaluation Policy should be used.

5.14. Miscellaneous

All payments of salaries, benefits and discretionary payments are subject to normal deductions of tax and National Insurance.

6. GOVERNANCE AND REGULATION

6.1 The Executive Management Team and the Board

The Executive Management team and the Board review and control compliance with the Staff Remuneration Policy. The policy will be reviewed every five years by the EMT with the Board's approval to ensure any necessary amendments or legislative changes are reflected.

Any changes to the policy will be agreed after consultation with the EMT, the Board, the Head of HR, and Trade Union representatives.

6.2 The Scottish Housing Regulator's Regulatory Standards

WHS follows the SHR's Regulatory Standards in regards to Remuneration which supports the organisation to drive their own improvement and deliver value for money. Having the Staff Remuneration Policy in place under the control, management and review of the Board, supports a clear and transparent process towards remuneration decisions.

In reviewing and setting levels of Staff remuneration, WHS will ensure that the requirements of the SHR Regulatory Standards and Guidance are followed.

7. SANCTIONS

- 7.1 Any breaches of this policy will be treated seriously and may be subject to disciplinary action under WHS's Disciplinary Policy.
- 7.2 Staff who become aware of breaches to this policy or deliberate failure to follow WHS guidance should refer to the Group Whistleblowing policy.

8. RELATED/REFERENCED POLICIES

- WHS Disciplinary Policy
- WHS Grievance Policy
- WHS Job Evaluation Policy
- WHS Probation Policy
- Scottish Housing Regulator (SHR) Remuneration Regulatory Standards
- Wheatley Group Whistleblowing Policy