

Policy Name: Insurance

Policy Number: G18

Policy Owner	Lisa Hughes		
Responsible Executive	Carron Garmory		
Effective Date	April 2026		
Review Date	April 2029		
Approved By	Executive Team		
Date Approved	June 2026		
EIA Status	Initial Screening Conducted	Yes X	No
	Full EIA Conducted	Yes	No X
Posted on Website	Yes		

If you need this publication in larger print, audio form, Braille, or in another language, please contact our office.

Contents

1.	Introduction.....	3
2.	Scope of the Policy.....	3
3.	Policy Aims and Objectives.....	3
4.	Procurement Requirements.....	4
5.	Responsibilities.....	4
6.	Claims Process.....	4
7.	Compensation Payments.....	5
8.	Tenants' Home Contents Insurance.....	5
9.	Factoring Insurance Provision.....	5
10.	Legal and Regulatory Framework.....	5
11.	Legislation and best practice.....	5
12.	Communication and Awareness.....	6
13.	Risk Management.....	6
14.	Improvement, Monitoring and Review.....	6
15.	Training and Competency.....	6
16.	Equality, Diversity and Inclusion.....	7
17.	Approval and Review History.....	7
18.	Appendix 1 - Key References and Supporting Documents.....	8
19.	Appendix 2 - Sums Insured 2026/27.....	10
20.	Insurance Contact Details for 2026/27.....	12

1. Introduction

Clyde Valley Group (CVG) recognises the importance of maintaining appropriate insurance arrangements to protect tenants, employees, governing body members, assets, liabilities, and business operations.

This policy sets out the framework through which the CVG will govern, procure, manage, monitor, and review insurance arrangements in support of effective governance, financial resilience, and regulatory compliance.

CVG acknowledges that insurance forms part of a wider risk management framework and does not replace the need for robust operational controls, statutory compliance, and proactive risk mitigation.

2. Scope of the Policy

This policy applies to all activities undertaken by CVG including:

- Housing stock and associated assets
- Offices, depots, and community facilities
- New build and development activity
- Employees and governing body members
- Contractors, consultants, and volunteers
- Vehicles, plant, and equipment
- Information systems and digital infrastructure including cyber
- Subsidiaries and group entities where applicable.

3. Policy Aims and Objectives

The aims and objectives of this Insurance Policy include:

- Ensure adequate insurance cover is maintained
- Protect the CVG's financial viability and assets
- Support business continuity and service resilience
- Ensure compliance with legal and regulatory obligations
- Define roles and responsibilities for insurance governance
- Ensure value for money in insurance procurement
- Provide assurance to tenants, lenders, regulators, and stakeholders

CVG will maintain appropriate and proportionate insurance arrangements to protect against financial loss arising from insurable risks.

Insurance arrangements will:

- reflect the CVG's risk profile;
- support service continuity;
- protect tenant interests;
- comply with legal and contractual obligations;
- be reviewed regularly to ensure adequacy and value for money.

CVG will adopt a risk-based approach to determining:

- appropriate cover levels;
- excess levels;
- self-insured risks;
- uninsured exposures.

4. Procurement Requirements

Insurance procurement will be the responsibility of the Finance & Corporate Services Director and will:

- comply with procurement legislation and its Procurement Policy
- seek value for money and appropriate coverage
- consider insurer financial strength and sector expertise
- normally be subject to periodic market testing.

CVG may utilise:

- framework agreements;
- insurance brokers;
- direct procurement routes.

5. Responsibilities

The Finance & Corporate Services Director is responsible for overall oversight of the Insurance Policy, including the procurement of insurance services, the management of insurance arrangements, and the co-ordination of claims across CVG.

The Finance & Corporate Services Director will ensure that insurance arrangements are reviewed annually to confirm that cover remains appropriate, proportionate, and aligned to CVG's risk profile and operational requirements.

The Health & Safety Operational Group will receive regular updates on claims trends, claims performance, and related risk management issues to provide assurance that insurance arrangements are operating effectively in practice. Claims that meet the threshold for a Notifiable Event will be reported to the Board in accordance with CVG's governance arrangements.

Records relevant to insurance claims, incidents, and any associated legal proceedings must be retained for a minimum of six years, unless a longer retention period is required by law, regulation, or CVG policy. This includes, where applicable, inspection records, accident books, and reports of injuries or dangerous occurrences.

Responsibility for maintaining records is as follows:

- **Finance & Corporate Services Director** – records relating to office accommodation and corporate services matters;
- **Director of Property & Development** – records relating to property assets and customer property matters;
- **People Director** – records relating to employees and employment matters; and
- **Director of Customer Services** – records relating to customer matters not connected to property.

6. Claims Process

CVG will maintain robust claims management arrangements. This will include:

- prompt reporting of incidents;
- maintenance of a claims register;
- investigation of significant claims;
- trend analysis;
- fraud prevention measures;
- lessons learned reviews.

Material claims will be reported to the Audit & Risk Committee and/or Governing Body.

7. Compensation Payments

There may be times when an insurance claim is received which is less than the value of excess applied to the policy, or where the sum is minimal and would result in a negative effect to the Group's claim ratios. In these cases, and where it is determined to be at the fault of the CVG then the Finance and Corporate Services Director is authorised to make direct payments up to the value of £500 following a recommendation from the responsible Manager. All evidence of the payment and decision should be saved in the central insurance file.

An annual compensation budget provision will be incorporated within the Insurance budget.

8. Tenants' Home Contents Insurance

CVG does not offer tenants the facility to pay for household contents insurance with their rent.

CVG is committed to promoting the importance of taking out home contents insurance to customers and this is reinforced through the tenant's handbook and newsletters. The Director of Customer Services is responsible for promoting this and where applicable sharing sector wide provision available.

9. Factoring Insurance Provision

Where title deeds require buildings insurance to be arranged through the Factor, CVG will ensure that appropriate insurance arrangements are in place for the relevant property. This approach supports efficient claims handling and reinstatement where a building is insured under a single policy.

Where title deeds do not require insurance to be arranged through the Factor, owners may be responsible for arranging their own buildings insurance. In such cases, owners must:

- ensure that the property is insured for an appropriate reinstatement value;
- maintain valid buildings insurance at all times; and
- provide evidence of cover, including the sum insured and renewal details, to CVG when requested.

Where CVG acts as Factor, it will monitor compliance with insurance requirements for factored and relevant commercial properties. If an owner fails to maintain adequate insurance, or fails to provide satisfactory evidence of cover, CVG may, where permitted by the title deeds or other applicable arrangements, place the property on the block insurance policy and recover the associated cost from the owner.

Owners must provide evidence of buildings insurance within the timescale set out in the title deeds, factoring agreement, or any other applicable legal or contractual requirement. Where owners are entitled to inspect insurance arrangements affecting the building, CVG will respond in accordance with those requirements.

Clyde Valley Property Services will write annually to relevant owners to request evidence of buildings insurance and will maintain a record of responses for monitoring and compliance purposes.

10. Legal and Regulatory Framework

11. Legislation and best practice

We will comply with all relevant legislation and associated regulations, including:

- The Housing (Scotland) Act 2010 updated 2026
- Procurement legislation and internal financial regulations;
- Loan covenant and lender insurance requirements

- The Scottish Housing Regulator.

CVG recognises that confidentiality is important to tenants and will treat their tenancy information in the strictest confidence under “Data Protection Law” which includes:

- The Data Protection Act 2018
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- All other applicable EU and UK data protection laws, including those that are made as a consequence of the UK leaving the EU
- Any legislation or laws that amend the above.

12. Communication and Awareness

We will promote our Insurance Policy through our website.

13. Risk Management

Managers within CVG must be aware of both the insured and uninsured risks and the conditions relative to them that are likely to affect their area of responsibility. Insured and uninsured risks will be identified and reported through Operational Risk Registers in line with the Risk Management Policy. The Finance & Corporate Services Director is responsible for making recommendations to Board in relation to insured and uninsured risks.

Managers will ensure that all members of staff are aware of key risk areas and take preventative action to minimise uninsured losses.

14. Improvement, Monitoring and Review

The policy will be reviewed every 3 years by the Director of Finance & Corporate Services. Reviews will incorporate tenant and stakeholder feedback, any learning and regulatory updates. Any amendments to the policy will be communicated to staff and stakeholders within 30 days of approval.

Internal Assurance - A formal system of monitoring the insurance process will be established and maintained with properly defined reporting, escalation, and action procedures which will be managed by the Corporate Team, a full review of insurance provision will be reviewed annually by the Corporate Team working with the approved broker. The insurance process will also be audited within the 3-year period by Head of Assurance.

Audit & Performance Reporting - Quarterly reports will be prepared and issued to Health and Safety Operational Group

External Quality Assurance - The insurance process will also be audited within the 3-year period by CVG Internal Audit partners.

15. Training and Competency

All staff with responsibilities in managing and supporting insurance provision will be required to undertake take refresher training on an adhoc basis and ensure they are familiar with this policy and their specific roles and responsibilities. They should also ensure they are up to date with current processes.

Training will be provided to and not limited to the following staff groups:

- Technical Inspectors
- Housing Officers
- Corporate Services Team.

16. Equality, Diversity and Inclusion

Our Insurance Policy complies with CVG’s Equality Diversity and Inclusion Policy to ensure equality of treatment for all staff, board and customers without discrimination or prejudice.

At CVG we value people and their diversity and strive to be inclusive. We respect others, regardless of personal differences and we listen to people to understand their needs and tailor our service accordingly. We will strive to promote equal access to our service for all members of the community and provide fair and equal treatment, promoting human rights in line with our Equality, Diversity and Inclusion Strategy and Policy.

17. Approval and Review History

Version	Author of Change	Changes	Approved by	Date Approved
1.0		Providing clarity on our approach to insurance.	Board	June 2026

18. Appendix 1 - Key References and Supporting Documents

Summary of Main Insurance Policies

The following is a summary of the main cover required:

- i. **Property** - protects CVG property which includes also included in this list are solar panels, playgrounds, landbanks, mid-market and market rent, garages, statues, commercial buildings, factored properties, against theft damage, damage by fire, lightning and explosion, vandalism, floods, and storms and, in certain circumstances, additional perils.
- ii. **Public Liability** - provides cover for these subsections, Corporate Manslaughter, damp & mould injury, cladding, asbestos, abuse, and data protection in respect of claims made by third parties for injury or loss resulting from negligent acts by CVG, its employees, members, or agents.
- iii. **Employers Liability** - provides cover in respect of claims made by employees for injury or loss sustained in the course of their duties and resulting from the negligent acts of CVG, its employees, members, or agents.
- iv. **Property Owners Liability**
- v. **Motor Vehicles** - provides cover on a fully comprehensive basis for damage to vehicles owned or leased by CVG in addition to providing cover in respect of claims made by third parties resulting from negligent acts by CVG drivers.
- vi. **Money** - provides cover in respect of the loss of cash in transit or cash held on CVG premises.
- vii. **Fidelity Guarantee** - protects CVG against losses arising from fraudulent acts committed by its employees and Members.
- viii. **Officials Indemnity** - provides cover in respect of claims made by third parties for economic loss occasioned by a negligent act or omission by CVG employees and Members in the course of their duties.
- ix. **Personal Accident** – provides cover to CVG members and employees for permanent disablement or death resulting from accidents to Members or employees occurring during duty.
- x. **Professional Indemnity** – provides cover in respect of claims by third parties that have suffered an economic loss as a result of reliance upon negligent advice from CVG employees, where such advice is given outside the scope of a statutory duty or a statutory default power.
- xi. **Consequential Losses** – provides cover in respect of additional expenses due to loss of buildings and other equipment following fire and other perils, such as loss of revenue, cost of hiring alternative accommodation, and the restoration of computer records.
- xii. **Pollution risk** – provides cover in respect of claims from third parties, for bodily injury or damage to property, due to gradually occurring pollution or contamination of buildings (and other structures), land, water, and the atmosphere.
- xiii. **Theft and Vandalism of Equipment** - blanket insurance of all equipment belonging to CVG, or for which it is responsible, against loss or damage by theft or vandalism.

- xiv. **Terrorism** – provides cover in respect of damage to buildings, equipment, and vehicles as a result of terrorist actions including sabotage.
- xv. **Business Travel** – provides cover to CVG members and employees for permanent disablement or death resulting from accidents to Members or employees occurring while travelling for business purposes.
- xvi. **Business Legal** – provides cover to CVG in respect of legal costs arising from issues such as to employee disputes, tax investigations, compliance issues, and legal defense.
- xvii. **Contract Works** – Provides cover in respect of Loss or Damage to contract works, temporary works and materials in connection with the contracts undertaken for New build, Rehabilitation or Refurbishment of properties.
- xviii. **Cyber** – provides cover in respect of threats in the digital age, such as data breaches or malicious cyber hacks on work computer systems.

19. Appendix 2 - Sums Insured 2026/27

Property Policy Sums Insured		
Rented Sum Insured		£865,188,330.92
Factored Sum Insured		£20,148,778
Commercial Sum Insured		£7,926,321
Garages Sum Insured		£166,212
Innov8 Sum Insured		£2,457,752.22
Mid Market Rented Buildings Sum Insured		£19,837,571.49
Tantallon Road Sum Insured		£4,790,869.80
Overtown Primary School Sum Insured		Inc rented
Solar Panels Sum Insured		Inc rented
Playgrounds Sum Insured		Inc rented
Landbanks Sum Insured		Inc rented
Stained Glass Window at Broomknoll Sum Insured		Inc rented
Landlords Contents Sum Insured		Inc rented
Monk Statue Sum Insured		Inc rented
Private Landlords Sum Insured		£4,815,325.13
Myers Court Sum Insured		£6,319,934.28
Douglas Stock Sum Insured		£15,417,426.75
Contents Sum Insured		£525,000
Stock Sum Insured		£1,500
Property Policy Excesses		
Rented Property		£250, rising to £1k subsidence
Factored / Shared Owner		£100, rising to £1k subsidence
Commercial Property		£250, rising to £1k subsidence
Contents		£250
Single Event Excess?		Yes
Property Policy Extensions		
Loss of Rent/Alternative Accommodation		33%
Capital Additions		£5m anyone building, £25m aggregate
Policy Limit		£100m
Rate Guarantee	Earned Loss Ratio 0%-9.99% 10%-14.99% 15%-64.99% 65%-84.99% 85%-99.99% 100%-129.99% 130% and above	Rate Change on following period Up to -7.5% Up to -5% 0% Up to +10% Up to +20% Up to +30% Negotiable
Liability Limits		
Employers Liability Limit		£20m
Public Liability Limit		£10m
Property Owners Liability Limit		£10m

Public Liability (Sub Limits)	
Corporate Manslaughter Defence Costs	£10m
Damp & Mould Injury	£500k
Cladding	£10m
Asbestos Accidental Discovery	£5m
Abuse	£5m
Data Protection	£10m
Terrorism	
Policy Limit	£100m any one event
NCBR Cover	Policy Limit
Excess	As per property damage
Cyber	
Policy Limit	£3m
Excess	£2.5k
Waiting Period	8 hours
Cyber Crime Sub-Limit	£250k
Group Personal Accident	
Employees (E) Covered	24 hours a day
Committee members covered	HA business only
(E) Death	5 x Annual Salary
(E) Temporary total disablement	50% Weekly wage
(E) Temporary partial disablement	50% Weekly wage
(E) Permanent total disablement	5 x Annual Salary
Increased Costs Of Working	£40k (12 months)
Data Reinstatement	£50k
Business Interruption	
Indemnity Limit (Period)	£500k (24 months)
Contract Works	
Policy Limit (Refurb)	£7,591,000
Contingent New Build	£500k
Directors & Officers	
Individuals Limit	CVHA: £2m Innov8: £2m
Entity Limit	CVHA: £2m Innov8: £2m
Alleged Sexual Abuse	Covered
Defence Costs Bodily Injury (CVHA)	Individuals: Full Limit Entity: Full Limit
Professional Indemnity	
Indemnity Limit	£2m
Fire Safety Claims	£1m
Crime	
Indemnity Limit	£500k
Social Engineering	£250k (Inc Cyber)
Motor Fleet	
Vehicle Number	3
Cover Type	Comprehensive

20. Insurance Contact Details for 2026/27

Link to Complaints Handling Guide - [Clyde Valley HA CHG 2026-27 .docx](#)

Marsh

Joshua Rice – Development Executive	joshua.rice@Marsh.com 07385 403830
-------------------------------------	--

Protector

Harriet Mound Client Relationship Lead	Harriet.Mound@protectorinsurance.co.uk Tel: 0161 2749077 Mob: 07552186516
Client Relationship Team	Relationship@protectorinsurance.co.uk
Motor, Property & Liability Claims Department	Claims@protectorinsurance.co.uk 0161 2749077