



<b>Policy:</b>	<b>Openness, Accountability &amp; Confidentiality</b>
<b>Organisational</b>	
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# **OPENNESS, ACCOUNTABILITY & CONFIDENTIALITY POLICY**

## **1.0 Introduction**

The aim of this Policy is to ensure that Staff and Committee conduct the Association's operations in an open and accountable manner but respect confidentiality when appropriate. The Association's objective is to be as open and accountable to as wide a range of Tenants and stakeholders as possible.

## **2.0 Accountable to Whom**

Staff and Committee should be clear that the main stakeholders are:-

- Tenants
- Members
- Residents
- Shared Owners
- Owners
- Local Communities
- Local Authorities
- Local Councillors
- MSP's
- MP
- Scottish Housing Regulator
- EHRA members
- Scottish Government
- Connect Community Trust
- Other Partner Organisations

The Association will produce information regarding performance against targets and ensure access to the organisation, its structures and information as described in the following paragraphs.

## **3.0 Formats**

The Association will produce its written literature in any format required by any individual Tenant, i.e. large print, Braille, community language etc. Interpreters will be made available as required. The Association is a member of Happy To Translate.

## **4.0 Annual Report**

The Association will produce an Annual Report by September of each year, for the previous financial year, setting out the following information:-

- i) Actual performance against targets and national averages
- ii) Customer Feedback and Complaints
- iii) Association activities in development and Wider Action
- iv) Significant Policy and Procedure reviews
- v) Changes to Committee and Staff structures
- vi) Overview of the work of the Association in the financial year

The Annual Report will be distributed to all the main stakeholders identified at 2.0, and will be available on request free of charge. A copy will be downloadable from the Association's website.

## **5.0 Tenants Handbook**

- 5.1 All tenants will receive a Tenants Handbook at the start of tenancy.
- 5.2 The Tenants Handbook will be completely reviewed every five years and regularly updated with information as necessary.
- 5.3 The Tenants Handbook will be made available in any format required by any individual tenant.

## **6.0 Tenants Newsletters**

- 6.1 Newsletters are distributed quarterly in April, July, September and December of each year. The Newsletter generally contains articles on the following:-
  - Membership
  - Complaints
  - Policy and Procedure reviews
  - Development update
  - Housing Management news
  - Technical Services Information
  - Events
  - Office Closures
  - Suggestions for improvement of services
  - Competitions for tenants and members
  - Performance reviews
  - Changes in legislation
- 6.2 The Newsletter shall be delivered to every home in the area.
- 6.3 The Newsletter will be made available in any format required by any individual tenant.
- 6.4 A downloadable copy will be available on the Association website.

## **7.0 Policy and Procedures**

All policies and procedures are available free of charge, on request, to the main stakeholders. The Association will provide a copy of a policy within 5 working days of the request. An index of all the Association's policies and procedures is contained within Appendix 1.

Tenants' views will be sought on policy and procedure reviews in a variety of ways, depending on the most appropriate method, including:-

- Public meetings
- Surveys
- Tenants Newsletters
- Focus groups
- Zoom meetings

The Guide to Information on our website gives links to the location of policies and other key information on our website.

The guide to information is updated annually and can be found here:

<https://provanhallha.org.uk/policies/>

## **8.0 Publicly Available Documents**

The following documents are also available on request free of charge with 5 working days, and are downloadable from our website (see the link in section 7):-

- Non confidential Management Committee and Sub-Committee minutes
- Tenant Participation Action Plan
- Wider Role Action Plan
- AGM minutes
- Annual Audited Accounts

## **9.0 Committee Meetings**

Stakeholders are invited to attend the non-confidential parts of Management Committee and Sub-Committee meetings. The request must be made in writing and addressed to the Director. The Director will take the request to the next Management Committee meeting. The stakeholder will be invited to attend as an observer with no voting rights but may ask questions as to the content and implementation of decisions.

## **10.0 Access to Management Committee**

The Association has an ongoing commitment to promoting access to the Management Committee via:-

- Attendance at Management Committee meetings as an observer
- Public meetings
- AGM
- Encouraging individual and Corporate Membership

A Committee Members Handbook and Leaflet are available on request.

## **11.0 Whistleblowing**

The Association has a separate Whistleblowing Policy available on request.

## **12.0 Membership**

The Association has a separate Membership Policy available on request. A copy is available to download from our website.

The Association's Membership Register is available for inspection by all tenants, members, auditors and The Scottish Housing Regulator, on request.

## **13.0 Confidentiality**

While the Association strives to be open and accountable in its operations, Staff and Committee are also bound by Data Protection and Confidentiality in appropriate areas.

13.1 Committee's role in confidentiality will be exercised in the following ways:-

- i) All reports to Committee will be presented in such a way as to protect the identity and privacy of the individual concerned. Only anonymous information will be presented, along with the facts of the case.
- ii) Decisions taken collectively regarding confidential information will not be discussed out with Committee meetings.
- iii) Committee Members are required to declare any interest, financial or otherwise by completing a Declaration of Interest form. This form will be updated annually at the AGM. Any changes throughout the year must be notified to the Director and updated on the Register.

- iv) Committee Members will not take part in any discussions at meetings relating to decision making over another tenant, family member or organisation, where there is a conflict of interest.

13.2 Staff members' role in confidentiality will be exercised in the following way:-

- i) Staff members will not disclose any information regarding a current tenant or former tenant to another party unless a signed mandate is provided by the tenant. The exception to this is where there are statutory authorities, e.g. Police who have made requests for information.
- ii) Requests made by any Officer regarding the location or status of a resident or members of their household will be met with caution. If possible the request should be made in writing with a signed mandate from the tenant to provide the information. Urgent telephone requests for information should be provided by the appropriate staff member confirming the identity of the individual requesting information by return telephone call.
- iii) Members of the public requesting information about other tenants are to be advised to leave a contact name and address / telephone number. The Association will contact the resident on their behalf and pass on any relevant information.

*Cross ref: Code of Conduct Policies and Data Protection Policy.*

## **14.0 Complaints**

The Association has a separate Complaints Policy

Applicants may request a Complaints Form & Leaflet and copy of the Policy if they choose to complain about any aspect of the above. Every applicant has final recourse to the Scottish Public Services Ombudsman. More details of our Complaints policy and procedure and a complaint form are available on our website.

<https://provanhallha.org.uk/complaints/>

## **15.0 Equal Opportunities**

The Association will have regards to its statutory obligations in relation to Equal Opportunities, and its equality and diversity policy, in executing this policy.

## **16.0 Notifiable Events**

Any issue which arises from the execution or breach of this policy, which constitutes a notifiable event, shall be reported to the Scottish Housing Regulator via its notifiable events procedures.

## **17.0 Review of Policy**

This Policy will be reviewed five years from date of approval, or earlier if required due to any relevant changes in legal or regulatory requirements.



## **APPENDIX 1**

### **LIST OF POLICIES AND PROCEDURES**

## **COMMITTEE & STAFF**

<b>CODE</b>	<b>POLICY</b>	<b>PROCEDURE</b>
CS 01	Staff Safety	
CS 02	Learning and Development	
CS 03	Personal Protective Equipment	
CS 04	Code of Conduct for Committee Members	
CS 05		Use of Association Seal
CS 06	Payments of Expenses to Governing Body Members	
CS 07	Management Committee Handbook	
CS 08	Committee Structure	
CS 09	Staffing and Salary Structure	
CS 10	Job Description	
CS 11		Staff Appraisal System
CS 12		Grievance Procedure
CS 14	Induction: Staff	
CS 16	Stress Policy	
CS 17	Alcohol & Substance Misuse	
CS 18	Attendance Management	
CS 19	Dignity at Work	
CS 20		Blood, Body Fluid & Sharps
CS 21		Out of Hours Procedure
CS 22	Pre Retirement Policy	
CS 23	Committee Recruitment Policy	
CS 24	Flexible Working Policy	

<b>CODE</b>	<b>POLICY</b>	<b>PROCEDURE</b>
CS 25	Lone Working	
CS 25		Lone Working
CS 26	Committee Induction	
CS 27	Staff Code of Conduct	
CS 28	Payment of Expenses to Staff	
CS 29	TOIL	
CS 30	Management Committee Succession Policy	
CS31	Management Committee Succession Action Plan	
CS32	Personal Relationships at work	

## **FINANCIAL MANAGEMENT**

<b>CODE</b>	<b>POLICY</b>	<b>PROCEDURE</b>
FM 01	Treasury Management	
FM 02	Financial Regulations	
FM 03		Financial Procedures
FM 04		Register of Disposals
FM 05		Fixed Asset Register
FM 06	Insurances	
FM 07	Annual Budget	
FM 08		Cash Handling
FM 10		Salary
FM 11		Invoice Payments / Cheque System
FM 13		Insurance Claims

## HOUSING SERVICES

<b>CODE</b>	<b>POLICY</b>	<b>PROCEDURE</b>
HS 01	Allocations	
HS 02	Internal Transfer	
HS 04	Estate Management	
		Estate Management
HS 05	Animals	
HS 06	Rent Management	
		Rent Management
HS 07	Voids	
		Voids
HS 08	Tenancy Agreement	
HS 10	Start of Tenancy	
		Start of Tenancy
		Abandoned Tenancy
HS 13	Antisocial Behaviour	
		Antisocial Behaviour
HS 14		Disabled Adaptations
HS 15	Factoring Policy	
HS 19	Garden Areas: Exclusive & Shared	
HS 21		New Tenant Survey
HS 22	Rent Setting	

## ORGANISATIONAL

CODE	POLICY	PROCEDURE
OG 01	Equality and Diversity	
OG 02	Complaints	
OG 03	Membership	
OG 03		Membership
OG 04	Internal Management Plan – now part of business plan.	
OG 05	Risk Management	
OG 06	Risk Strategy (within Risk Management Policy)	
OG 08	Tenant Participation	
<b>OG 09</b>	<b>Health and Safety</b>	
OG 10	Payments, Benefits and Entitlements	
<b>OG 11</b>	<b>Tenants Handbook</b>	
OG 12	Whistleblowing	
OG 13	Smoking	
<b>OG 14</b>	<b>Performance Indicators and Reporting – now part of business plan.</b>	
OG 15		Computer Back-up
OG 16		Mail
OG 17	Openness, Accountability and Confidentiality	
OG 18	Internal Audit Plan	
OG 19	Standing Orders	
OG 20	Communications Tools	
OG 21	Customer Satisfaction Action Plan –	
<b>OG 22</b>	<b>Minute of Agreement</b>	

<b>CODE</b>	<b>POLICY</b>	<b>PROCEDURE</b>
OG 23	Rules	
OG 25	Business Plan	
OG 26	Wider Role Strategy	
OG 29	EHRA Emergency Cover Agreement	
OG30	Unacceptable Actions	
OG31	Succession Planning	A
OG32	Occupational Driving	Occupational Driving
OG33	IT Security Policy	
OG34	Data Protection Privacy Policy	
OG35	Sustainability Policy	
OG36	Password Policy	
OG37	Model Role Descriptions For Management Committee	
OG38	Freedom of Information and Environmental Information Policy	
OG 39	Guide To Information	
OG 40	Homeworking	
OG41	Anti - Bribery and Fraud	

## TECHNICAL SERVICES

CODE	POLICY	PROCEDURE
MN 01	Repairs and Maintenance	
		Repairs and Maintenance
MN 02	Procurement	
MN 03		Key Register
MN 04	Rechargeable Repairs	
		Rechargeable Repairs
MN 05	Sustainability	
		Sustainability Action Plan
MN 06	Asset Management	
		Asset Management Action Plan
MN 08	Alterations and Improvements	
		Alterations & Improvements
MN 09	Right to Repair	
		Right To Repair
MN13	Right to Compensation for Improvements	
MN15	Appliance and Fixture Removal	
MN16	Gas Appliance Servicing	
		Gas Appliance Servicing