



ACCESS TO INFORMATION POLICY (2017)

1.0 INTRODUCTION

The Association is committed to promoting a culture of openness, transparency and accountability in respect of all its activities.

This policy sets out how the Association will conduct its business in an open and accountable manner whilst, at the same time, ensuring that personal and commercial confidentiality is maintained where appropriate and that compliance with data protection legislation is achieved.

2.0 AIMS AND OBJECTIVES

The Association believes that its members, tenants, sharing owners and any other interested parties should have access to information on how it conducts itself. This means that unless information requested is considered commercially sensitive or personally confidential it will be made available on request.

3.0 OPEN ALL HOURS? A MODEL PUBLICATION FRAMEWORK FOR RSLs

As part of our commitment to openness and transparency the Association has adopted a Publication Framework that sets out the range of information that we publish. Our Publication Framework complies with legal requirements and is consistent with the Model Publication Framework promoted by the Scottish federation of Housing Associations (SFHA).

A copy of the Publication Framework will be displayed in the reception area of our office in addition to being available on our web site.

Newsletters and other regular briefings will remind readers about this Publication Framework and how to access information.

The information provided in our Publication Framework is as follows:

- **About Us**
 - ✓ Contact Details
 - ✓ Governing Body Membership
 - ✓ Membership Policy
 - ✓ How to join the Governing Body
 - ✓ Senior Staff Team
 - ✓ Organisational Structure
 - ✓ Relationship with Regulators
 - ✓ Entitlements, Payments and Benefits Policy
 - ✓ Salary Grades
 - ✓ Groups and Partnerships

- **How Decisions are Made**
 - ✓ The Role of the Governing Body
 - ✓ Tenant Consultation / Engagement Arrangements
 - ✓ What Has Been Decided
- **Where the Money Comes From and How it is Spent**
 - ✓ Description of main source(s) of income
- **How We Provide Services**
 - ✓ Services
- **Who We Work With**
 - ✓ Contractors
 - ✓ Regulated Procurement
- **How we Measure and Report Performance**
- **Key Policies**

The above list is not exhaustive and the Association will action any request for information within a reasonable timescale, unless it is prevented from doing so by the Confidentiality section of this policy.

Any requests for information should be authorised by the Director (or most senior staff member in the Director's absence).

One of the expectations in adopting such a Framework is that this should lead to fewer requests for information being received, and that the majority of requests for information are easier to deal with. If someone asks for something that is available on the website, they can be directed there instead (although information will also require to be available in other formats).

To amplify the Associations commitment to openness and transparency a statement is clearly expressed on the website to that effect with reference being made to our Publication Framework

For ease of finding the information there is a section on the website entitled "**Looking For Information About What We Do**" which is where the information can be found (or hyperlinks thereto).

Although the Association wishes to be as open and transparent as possible we also have to give careful consideration to the issue of confidentiality. Our commitment to openness therefore has to be balanced with the need to observe and maintain confidentiality.

For this reason our Publication Framework is focused on providing information that is neither sensitive nor confidential with any requests for the latter being dealt with through inspection on request.

4.0 **IMPLEMENTATION, MONITORING & REVIEW**

4.1 Primary Point of Contact

The primary point of contact for information will be the Associations Head of Finance & Corporate Services / Depute Director as this fits with existing responsibilities as Data Controller.

4.2 Identifying Documents for Inclusion

All relevant documents will be identified as being associated with the Publication Framework in all Committee reports or document review processes.

4.3 Responsibility for keeping the information up to date and accessible

The Associations web site administrator will be responsible for:

- ✓ for keeping information up to date
- ✓ monitoring access activity on the website and how is this reported and used
- ✓ ensuring that the information provided is equally accessible to people who are using mobile and fixed electronic devices

4.4 Timescales

Information associated with the Publication Framework will be posted on the website and available in printed format within 10 working days (unless there are exceptional circumstances).

4.5 Charge for Providing Information in printed Format

Charges for providing information in printed format will be the same as for information provided under EIRs and existing practice (£10). A copy of the Associations Publication Framework is attached – **Appendix 1**.

5.0 **CHARGES FOR INFORMATION**

A standard administration charge of £10 will normally be made for requests for information. However, the Association reserves the right to make an increased charge, to cover administration, stationery, postage and the cost of the staff time involved, where it is felt necessary to do so.

6.0 **REVIEW**

This policy will be regularly monitored and formally reviewed at least every 5 years.

George Tainsh
Director

4th October 2017

Policy Review Consultation Process

Considered by the Management Team on	4 th October 2017
Considered by the Finance, Audit & Corporate Governance Committee on	9 th November 2017
APPROVED BY THE MANAGEMENT COMMITTEE ON	30th NOVEMBER 2017
Date of Next Review	November 2022

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DECLARATION

Signed **Date**

I(print name) have read and understood the
aforementioned policy and accept the expectations and obligations contained therein.

Clarification and guidance as required, on any aspect of the policy, has been sought and
obtained from the Director.

Approved