

BUIDHEANN TIGHEADAS LOCH AILLSE AGUS AN  
EILEIN SGITHEANAICH  
LOCHALSH AND SKYE HOUSING ASSOCIATION

# Access to Information Policy

<b>DATE APPROVED:</b>	<b>10 December 2007</b>
<b>APPROVED BY:</b>	<b>Management Committee</b>
<b>DATE OF REVIEW:</b>	<b>December 2010</b>

# **ACCESS TO INFORMATION POLICY**

## **CONTENTS**

1. INTRODUCTION
2. INFORMATION TO BE PROVIDED
3. INFORMATION FORMATS AND AVAILABILITY
4. CONFIDENTIALITY
5. TIMESCALES FOR THE PROVISION OF INFORMATION
6. COSTS OF THE PROVISION OF INFORMATION
7. REVIEW

# ACCESS TO INFORMATION POLICY

## 1. INTRODUCTION

- 1.1 Lochalsh and Skye Housing Association is committed to promoting and actively developing a culture of openness, transparency and accountability in respect of all its activities. The Association is also committed to developing and continuously improving accessibility for our members, tenants, sharing owners, service users, stakeholders, and others who may require information about the Association, our plans, services and performance.
- 1.2 This policy has been established to ensure that the Association can meet these commitments whilst also ensuring that we comply with the Data Protection Act 1998 and any identified need to maintain commercial confidentiality where appropriate.
- 1.3 For the purposes of this policy, information **held** by the Association includes not only information created by us and our agents, but also information in our possession which originated from outside organisations or individuals.

## 2. INFORMATION TO BE PROVIDED

- 2.1 In general, the Association will provide any information regarding its governance, services, policies and procedures and performance unless the release of the information would breach the Data Protection Act or commercial confidentiality considerations. Specific information to be provided includes the following:-

### 2.1.1 Governance and Accountability

- Our Rules
- Our aims and objectives
- Current Business Plan
- Becoming a member of the Association Information Pack
- Becoming a member of the Management Committee Information Pack
- Our current Management Committee Members
- Management Committee Members Disclosures of Interests
- Staff Members
- Annual General Meeting Minutes
- Management Committee Minutes
- Association Contact Details

### 2.1.2 Performance Information

- Annual Report
- Annual Performance and Statistical Return
- Annual Peer Group Report
- Quarterly Performance Report

- Annual Accounts
- Financial Services Authority Annual Return
- Complaints Monitoring Report

### 2.1.3 Policies and Procedures

- All approved key documents

### 2.1.4 Tenant Information

- Tenant Handbook
- Right to Information and Consultation
- Right to Compensation
- Right to Repair
- Tenant Participation
- Tenant Satisfaction Survey Information

### 2.1.5 General Information

- Details of the Services we provide and how to apply for these
- Newsletters
- Customer Services Charter
- Our property portfolio
- Rents and Charges

2.2 The Association will consult with and gather information from service users on the information that they consider should be provided and in what formats and timescales. We will also record the level of information requests from service users.

## 3. **INFORMATION FORMATS AND AVAILABILITY**

3.1 In accordance with the Association's E-Business Strategy, as much information as possible will be made available on-line on the Association's web pages in formats which are easy to read and efficient to access and download if required.

3.2 Paper-based information will be made available in the Association's offices and particular publications (Housing Application Packs, Newsletters and Annual Reports) will be distributed to other local outlets to improve their availability throughout the area. Local outlets will also be used to advertise the availability of Association services through poster advertising.

3.3 Quarterly Newsletters and Annual Reports will be mailed to all members, tenants, sharing owners and stakeholders on publication.

3.4 All information produced by the Association should be in plain English and easily understood. Graphics will be used where appropriate to enhance understanding of the information.

- 3.5 The Association will advertise the availability on request of information in other formats, eg on tape, in Braille, large print and community languages.
- 3.6 Requests from tenants/applicants/customers for copies of information about them held by the Association will be processed strictly in accordance with the Association's Data Protection Policy and Procedures.

#### **4. CONFIDENTIALITY**

- 4.1 The Association is subject to the Data Protection Act 1998 but is not subject to the requirements of the Freedom of Information (Scotland) Act 2003 which provides a right of access by the public to information held by public authorities.
- 4.2 However, in order to achieve best practice, the Association will act in a manner consistent with the principles of the freedom of information legislation. Therefore, there will be a presumption that the Association will comply with all reasonable requests for information unless the provision of the information would result in a breach of confidentiality (including commercial confidentiality).
- 4.3 It is not possible to produce a definitive list of all items considered confidential. The Association's Data Protection Policy contains explicit advice on what data falls within the requirements of the Data Protection Act and how and in what circumstances this data can or cannot be released to third parties. In general, the personal confidentiality of tenants, residents and members of the public must be respected. This means that names, addresses, details of family composition or economic status (or any other means of identification) of individuals must not be disclosed in Committee reports or minutes or in any other way divulged to a third party other than staff members with a "need to know" requirement.
- 4.4 All data records (both paper and electronic) must be maintained securely to preserve confidentiality in accordance with the Association's Data Protection Policy.
- 4.5 Any breach of confidentiality whether deliberate or inadvertent will be treated seriously and acted upon rigorously. Breaches of confidentiality may result in the Association's disciplinary procedures being used and staff or Committee members being warned or dismissed.

#### **5. TIMESCALES FOR THE PROVISION OF INFORMATION**

- 5.1 By maximising the availability of published information on our web pages and the continued publication of printed matter for display in our offices, it is anticipated that the vast majority of information requests can be dealt with immediately on request.

- 5.2 Information which is not readily available in the foregoing formats will be provided within 5 working days of request unless the request concerns complex information which may require to be obtained from a variety of sources in which case the request will be acknowledged within 5 working days and responded to within 10 working days.
- 5.3 Actual timescales for responding to information requests will be monitored for service improvement purposes.

## **6. COST OF THE PROVISION OF INFORMATION**

- 6.1 The costs associated with the provision of information will be monitored through the Association's usual budgetary procedures. No charge will be made for the provision of any of the information detailed in this policy provided that the information request is reasonable. Unusual requests (eg multiple copies of documents) may require to be referred to the Management Committee to consider whether the request has budgetary implications and a charge should be attached to the request.

## **7. REVIEW**

- 7.1 This policy was approved by the Management Committee on 10 December 2007 and will be reviewed by the Management Committee or Sub-Committee set up for that purpose no later than December 2010.
-