



**Policy Statement**

**Openness and Transparency Policy**

**April 2019**

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## 1. Purpose and Scope of the Openness and Transparency Policy

### Purpose

- 1.1. This openness and transparency policy provides clarity around the provision of information by the business and explains how we look to be transparent and open.

### Scope

- 1.2. This openness and transparency policy describes what the terms mean for our governance, specifically for Board, Committees and Values Group and also for other information more widely held by the business.

## 2. Policy Statement and Aims

### Statement

- 2.1. We ensure we are compliant with openness and transparency expectations of us either in doing the right thing and ensuring we are clear about how we comply with adopted governance and conduct codes.

### Aims

- 2.2. We aim to be as transparent as possible with our customers and others we engage with and in setting clear parameters within this policy there is a clear understanding of how we handle and share information about the business.

## 3. Links to other policies and procedures

- 3.1. The document should also be read in conjunction with:

- Data Protection Policy
- Codes of Conduct
- Adopted NHF Codes of governance and conduct

## 4. Openness and transparency

- 4.1. We are committed to openness and transparency and accept a general obligation to account for our actions and performance in an open manner. However, there are occasions when the confidentiality of information needs to be protected either because it concerns an individual or because disclosure would adversely affect the commercial interests of the business, or those of its partners, contractors or suppliers.
- 4.2. Information about us our work, Committees, Values Group and employees is available on request, unless there are good reasons of confidentiality or practicality why not. The Data Protection Policy should be referred to in relation to subject access requests and processing of personal data more generally.

4.3. Our guiding principles are that we will:

- In recognising the commercial sensitivity which exists around the business provide information in a way which reflects the wishes and needs of customers and other interested people wherever possible
- make information available in an accessible manner about our plans, policies, standards, and performance
- provide information about how we are governed, our finances and how we achieve value for money
- make sure that the information is easy to find, relevant, accurate and wherever possible self-explanatory
- respond to requests in a way which is cost effective and proportionate
- act lawfully and comply with any requirements set by our regulators.

## 5. Governance

5.1. Our financial statements will be published and contain a statement about compliance with the National Housing Federation's Code of Governance 2015.

5.2. These financial statements will contain:

- narrative reporting including the internal controls assurance statement, value for money statement and a statement of compliance with regulatory standards
- annual financial statements
- Chief Executive and Executive Directors salary packages
- any Board remuneration
- any other regulatory or statutory reporting disclosures as required.

5.3. We will also publish a summary annual report on the website for customers highlighting key activities and performance from the previous year.

## 6. The Board

6.1. All board and committee meetings of the group, including those of the Values Group will be closed, and not open to the wider public. Attendance will be restricted to members, shareholders and relevant officers of the business.

6.2. The board may decide to open a meeting should:

- they agree that it is in the best interests of the business to do so
- it would not involve disclosing personal information as defined by the Data Protection Act
- the information is not confidential or commercially sensitive. In such circumstances we would publicise the time, venue and date.

6.3. A clear explanation of how we are governed will be explained on our website including board member biographical details and photographs.

6.4. Registers of Interests are maintained for all board and committee members as well as Values

Group members and employees. These registers are available for public inspection upon request.

## 7. Information Availability

7.1. We have a responsibility to ensure that information about our actions and performance is available publicly. To demonstrate its commitment to openness and transparency, the business:

- produces a range of publications
- maintains an up to date website, providing information about services, performance, value for money, the people involved in the business and much more
- publishes tenant newsletters, electronically and in hard copy by request, to give readers an update on what's been going on in their local area,
- publishes information leaflets as appropriate
- publish an annual Value for Money statement

7.2. We publicise information through broadcast media such the press, radio and TV; and also publish information using social media, such as Facebook and Twitter.

7.3. Other key documents and policies are available on request, including (but not limited to) policies concerning:

- reporting concerns
- access to information
- access to housing
- rent setting
- complaints and compensation

7.4. If it will be expensive or time consuming to provide particular information or to provide information in a particular way, we will explain this and try to reach a satisfactory alternative solution.

## 8. Review

8.1. We will review the openness and transparency arrangements on a regular basis and take into account further developments and good practice.

8.2. We are not classed as a public authority for the purposes of the Freedom of Information Act. For more information on what you can expect from organisations which handle your personal data, please see the [Information Commissioner's Office website](#).