Open All Hours?

A Model Publication Framework and Guidance for Housing Associations and Co-operatives

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Open All Hours? A Model Publication Framework for Housing Associations and Co-operatives

Background

To demonstrate the sector’s commitment to openness, GWSF and SFHA jointly commissioned the development of guidance for housing associations about the range of information that should be readily available to tenants, customers and members of the public.

In promoting this Model Publication Framework, we are encouraging the sector to demonstrate its commitment to being open and transparent about the activities that are undertaken, how they are planned and funded, the policies and strategies that guide your work and the governance and decision making arrangements that support this. The starting point is to maximise the amount of information available and the ease of its access (albeit in a proportionate manner). This Framework encourages RSLs to be pro-active in making information available about the organisation and its activities. As well as demonstrating openness, such an approach should reduce the need for people to make a direct request to a housing association or co-operative.

Before preparing this guidance and Model Framework, an analysis of a large sample of housing association websites was undertaken. This showed that there is a wide variety of approaches to publishing information – from those who publish un-edited minutes of committee meetings to those who don’t publish basic information such as the names of committee members (even though the Rules require this).

In the context of access to information housing associations and co-operatives are not ‘public authorities’. Consequently, they are not currently subject to FOISA (Freedom of Information (Scotland) Act 2002) but, at the time of writing (September 2016), the Scottish Government has intimated its intention to consult on the potential extension of these provisions to the sector. In preparing the Model Publication Framework, SFHA and GWSF hope to equip the sector to demonstrate that a significant amount of information is made available to stakeholders and other interested parties. In the event that FOISA is extended to the sector, adoption of this Framework should make compliance with any additional statutory requirements easier.
Whilst not currently subject to FOISA, Scottish housing associations and co-operatives are subject to the Environmental Information Regulations (EIRs). SFHA has published a Briefing Note on the EIRs that is available via the SFHA website. This Model Publication Framework includes reference to the key policies and related documents that RSLs are likely to be required to ‘actively disseminate’ to comply with the EIRs. In relation to the arrangements for charging for information made available under this Framework, we have sought to reflect the EIR provisions.

In developing the Model Publication Framework and accompanying Guidance, we have taken account of the Model Publication Scheme issued by the Scottish Information Commissioner. We have tried to set out expectations that are reasonable and practicable for our sector so that there are as few obstacles as possible to making information readily available. The very fact that information is published should mean that housing associations receive fewer requests for information, 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. There must always be a back-up system for people who cannot or do not want to use a website – providing a paper copy on request is the easiest alternative.

We recognise that publishing information and keeping it up to date can be especially challenging for small associations. We considered the merits of a dual approach, involving different publication frameworks for organisations dependent on size, but we concluded that, rather than suggest that smaller organisations did not need to publish entire categories of information, proportionality could be achieved by amending the amount of detailed information made available in each category.

In promoting this Publication Framework, there is no intention to be unduly prescriptive or restrictive. The Framework sets out what we regard as being a reasonable set of expectations that people who are interested in the sector’s work are likely to have about the information that they have access to. We hope that, by promoting this Model, a minimum set of good practice standards will be established for the sector in terms of access to information.

Individual organisations can, of course, decide to publish more information than is recommended in this Framework but we strongly advise that all the information that you do publish is listed in the Publication Framework that you adopt. If you add to the model, you should ensure that your additions are listed in the relevant categories of the Framework that you publish so that people know that they can access this additional information.

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1 Scottish Information Commissioner Model Publication Scheme

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Of course, you cannot publish what you do not have. Where this Framework refers to information that your organisation does not currently produce, there is no suggestion that you should prepare information simply so that it can be published as recommended in this Framework. This is true also of FOISA and the EIRs.

This Model Publication Framework reflects the activities of the sector, the interests of tenants, service users and other stakeholders and the regulatory requirements that housing associations and co-operatives are subject to in respect of service delivery. We have also consulted with the Scottish Housing Regulator and we are confident that this Framework is broadly consistent with the findings of their 2016 thematic study on openness and accessibility.

In developing this Framework, we have tried to identify the information that tenants, service users, customers and other stakeholders are likely to be interested in. By making such information easily accessible, it is intended that people who are interested in the sector’s work should not have to make specific requests. We have taken account of the very wide range of different approaches to information provision that is already evident amongst housing associations and co-operatives.

By adopting the Model Publication Framework, housing associations and co-operatives will be able to demonstrate that they are meeting the standards of good practice promoted by the key representative bodies.

**The Model Publication Framework is included at Appendix A (p20-24). The following pages offer guidance in terms of adopting the model and further background as to the reasoning behind its content.**
Format for Publishing Information

This Model Publication Framework recommends that the main method of publication should be via the organisation’s website. We think it is essential that all RSLs have a website and that it should be up to date and easy to navigate. We recommend some key characteristics:

- The website address should be published and promoted on all information issued by the organisation
- Signposting on and to the website should be clear – it should be easy for people to find what they are looking for
- Websites should be just as accessible and navigable when accessed from mobile devices as from a PC
- The website should (wherever possible) reduce barriers to use by incorporating software such as ‘browse aloud’ (for audio use) and a translation facility (or equivalent)
- Staff should know what is available on the website and be able to direct people to it

Other formats may be more appropriate to meet the needs of people with disabilities and it is important that, when responding to requests for information, any specific needs are met appropriately and that the requirements of the Equalities Act are met.

It is important to remember that, in the case of information that you are required to publish in accordance with the EIRs, individuals can specify the format in which they wish the information to be provided (e.g. excel spreadsheet, pdf).

It is also important to remember that the information published is valuable and that you are entitled to protect it by means of copyright. A copyright statement should be included on your website, to reflect any consent/requirements prior to use of documents, information, logos etc. (in respect of both your own or other parties’ information). You should ensure that this reflects your commitment to making information available in accordance with this Publication Framework.

There are different ways in which you can adopt this Model Framework – some of the options that can be considered include:

- Locating information described in this Model Framework in appropriate sections of your current website and introducing an additional ‘tab’ for items that don’t ‘fit’ such as ‘Other information that you might find useful’
- Listing the categories of published information (as described below) on your website with links to the relevant documents; or
• Setting up a section of your website that contains all of the information recommended, with an appropriate title such as “What you might want to know” or “Looking for information about what we do”

For the avoidance of doubt, there is no need to post the same items in different parts of your website – links are perfectly adequate.

Where possible, we recommend that relevant information is included in publications that are widely distributed (such as the ARC Report) – again to make it easier for people to find. For this approach to be successful, it is essential that websites are well maintained and are up to date with current information. Where relevant, we have suggested target publication periods (e.g. information about committee decisions)

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| • make sure the website is up to date  
• make sure it is easy to find things – use clear titles  
• make sure it is easy to navigate  
• promote use of the website by describing what's available signposting  
• publish as much relevant information as possible (without cluttering the website)  
• use plain English | • allowing the website to become out of date  
• using labels that are unclear  
• making it necessary for people to know the title or location of what they're looking for  
• jargon |

Although we recommend that most of the information contained in this Model Publication Framework should be available via your website, it is appropriate that some information is available on request or for inspection. Examples of where such an approach is appropriate are given in the sections of this guidance that cover the various categories of information that make up the Model Framework.

Where information is available for inspection there should normally be a facility to post it out (e.g. by copying an extract from a register) so that people who cannot get to where the information is held are not disadvantaged. This guidance also indicates where RSLs might choose how (or when) to publish or otherwise make information available (e.g. in advance or retrospectively).

In developing this Framework and the accompanying guidance, we have given careful consideration to the issue of confidentiality. Our commitment to openness has to be balanced with the need to observe and maintain confidentiality. As this
guidance explains, we recommend that information should be accessible in a format that is useful to those people who are interested in the work of our members and the sector but which, at the same time, does not compromise personal privacy or business confidentiality. In the main, this Publication Framework is focussed on information that is neither sensitive nor confidential, but there are some areas where this is not the case. Examples include minutes, registers and information about pay and reward.

In the case of information about pay and grading structures (which are included in the Scottish Information Commissioner’s Model Publication Scheme), we believe that simply publishing a list of all the pay scales in an organisation, without any indication of where posts (in terms of job titles rather than post-holders) are placed, is of little real benefit. In a small organisation, however, publishing more specific information could result in the remuneration of an individual member of staff being identified, which would be both inappropriate and unfair. It may be more useful, for example, to publish information that shows the proportion of an organisation’s annual expenditure that is attributable to staff salaries, together with the total number of staff employed. Our advice is to make as much information available as possible, without compromising confidentiality or personal information.

In the case of minutes, publishing (or making available on request) the formal record of Board or Management Committee meetings will require care to ensure that personal, business sensitive and commercially confidential information is not included. It may be more useful to publish a note of the decisions that were made at a meeting, rather than the full minutes, though we do advise that the full minutes should always be made available if requested, subject to the confidentiality consideration referred to above.

We do not agree with the view that it is better to publish information that is redacted (i.e. has words and paragraphs blocked out) in order to satisfy a demand that, for example, minutes should be published – to publish in this form does not send out a message of openness and suggests, rather, a desire to conceal. Where minutes are to be published and it is necessary to obscure sections for reasons of confidentiality, we recommend that a brief note is added at the relevant part to say, for example, ‘personal information removed’ or ‘commercially sensitive information’.

Whether publishing the formal record or not, we suggest that a protocol is adopted that sets the parameters for the style and content of minutes: individual names (of GBMs, staff and advisers) should not normally be included and references should instead be to ‘a member’ or to designations in the case of staff and advisers.
We suggest that the detail of debates should not normally be included in minutes and that the interests of third parties are considered to ensure that information that is confidential or business sensitive from their perspective is not released. We recognise that minutes may, as a result, be written in a general style.

Of course, RSLs are required to notify third parties (such as contractors) that they are bound by the requirements of the EIRs and that, consequently, some environmental information may require to be published which may also feature in minutes and/or notes of meetings.

In the case of Registers, these inevitably contain personal information and it is for this reason that we recommend that access is available by inspection on request. We recommend that no charge is made for inspecting information.

We have not made firm recommendations about the format in which information in some of these potentially sensitive categories should be made available but we hope that this guidance is useful in informing your consideration of the most appropriate format for your organisation. In deciding how to make information available, we encourage all RSLs to consider what is likely to be most useful to the people who have an interest in what the organisation is doing and how it is doing it. It would be useful, for example, to consult with Tenant Scrutiny Panels, Focus Groups or Customer Panels to gather views and inform decisions, although it is important to remember that there are others who are interested in the sector’s work and that this Framework is not confined to information for tenants.

**Geography**

An important principle of the Publication Framework is that the availability of information should not be restricted by geography. By focussing publication on the organisation’s website, information is available to anyone who wants to access it. It must be recognised, however, that not everyone has access to the internet or is comfortable using it.

Another important principle of the Framework is that information should be equally accessible to everyone who has an interest in the sector’s activities. Consequently, the Framework also includes provisions for information to be provided in a printed form on request (although we anticipate that this is unlikely to be a frequent occurrence). Interested parties should be able to make such requests by telephone (or any other means that are reasonable) and requests should be responded to within an appropriate timescale. We suggest that housing associations and co-ops consider the following points in respect of responding to information requests:
• Who should be responsible for responding and how their contact details are made available
• Timescales for responding to information requests – these should be published: to reflect the commitment to equal access to information it’s important to ensure that the ‘gap’ between the immediate access that’s offered by the internet and the provision of information by post is as short as possible
• Any charges for providing information in a printed format – these should be based on the actual costs of providing the information (e.g. copying and postage) and should not normally include the costs of original production. The charging schedule should be publicised and anyone requesting information should be advised of the likely costs involved before the request is confirmed. The charging policy / schedule should be included on the website. If you don’t set out your charges for providing information, it may be regarded as being unreasonable if you try to charge people when they make a request. We suggest that, in determining what to charge for providing information, the same principles are applied that are set out in the EIRs:
  o The cost of staff time in locating, retrieving and / or extracting the information requested
  o The cost of printing, copying and postage

Publicising the Framework

Your website should contain a prominent statement to the effect that you are complying with legal requirements and have adopted the GWSF / SFHA Model Publication Framework (or an amended version of it). An example of such a Statement is:

“As part of our commitment to openness and transparency, ANY Housing Association / Co-op 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 and the Glasgow and West of Scotland Forum of Housing Associations”

A copy of the Publication Framework adopted by individual organisations should be displayed in the reception areas of all offices. Where a housing association doesn’t have regular contact with tenants and service users at their office (e.g. retirement housing providers, supported accommodation landlords), we recommend that the Publication Framework should be displayed and/or publicised in individual developments.

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

**Categories of Information**

In identifying the Publication Categories of this Framework, we have taken account of and identified the relevant outcomes in the Scottish Social Housing Charter. All housing associations and co-operatives should make information available in the following categories, even if these are not the exact headings used:

1. About Us: Who we are and what we do
2. How key decisions are made
3. Where the money comes from and how it’s spent
4. How we provide services
5. Who we work with, including the contracts that we have awarded under procurement legislation (i.e. regulated procurements) and our approved list of contractors (although it’s important to make clear that this isn’t an endorsement of the companies – just a list of those that are used)
6. Our Standards: How we measure and report performance
7. Key Policies

There are different ways in which you can adopt this Framework – we encourage housing associations in all cases to make a statement on your website that you have adopted this Model Publication Framework. Some of the options that can be considered include:

- Locating information described in the Framework in appropriate sections of your current site and introducing an additional tab for items that don’t ‘fit’ e.g. ‘Other Information That You Might Find Useful’ or
- Listing the categories of published information (as described above), with links to the relevant documents or
- Setting up a section of your website that contains all of the information recommended, with an appropriate title such as ‘What You Might Want to Know’ or ‘Looking for Information about What We do?’

The following outlines the kinds of information that should be included under each of the seven categories of information outlined above and provides advice and information on how to adopt and implement the Model Publication Framework included at Appendix A (p20-24).
Where information that should be available is listed in more than one category, it isn’t necessary to post it twice – links to another part of the website are perfectly appropriate.

**Publication Category 1: About Us**

**Contact Details:** As well as providing the information that is described for this category, it would be especially helpful if tenants and other customers are also able to access services directly. For example, when providing contact details, think about providing specific information about which housing officers cover which areas. Most websites that we reviewed contain information about how to report a repair, how to apply for housing and how to complain. Whilst there are many advantages to providing direct dial telephone numbers and email addresses, we have been made aware of some potential pitfalls (such as unsolicited marketing calls being made). It is for individual organisations to decide on the approach that suits them and their tenants / customers best.

**Governing Body Membership:** SFHA’s Model Rules require all RSLs to publish the names of members of their governing body. We recommend that the list of members should identify office-bearers and that there should ideally be short profiles of each member relating to their role on the governing body. These should not contain personal information but should describe their experience that is relevant to their role and their length of service.

It is for individual organisations to decide whether or not to include photographs but details of addresses etc. should not be included. The individual profile should ideally describe why an individual is involved and how long they have been a GBM; in describing relevant experience it would be useful to identify tenant members and also to include information about community and other relevant experience. Employment experience should be included where relevant. The profiles are intended to be general and their aim is to provide relevant information about who is responsible for leading and directing the RSL.

**Membership Policy:** This should identify who is eligible to join the RSL and will, of course, reflect the constitutional basis of each organisation (registered society or company). It should include information about the rights and benefits of membership and details of how to apply and how applications will be dealt with. It would be appropriate to make reference to the register of members that each RSL is required to hold and to identify how it can be accessed.
How to join the Governing Body: This should identify how an individual who wished to join the governing body would go about doing so, with reference to the Membership Policy. This should also include reference to what training and support is available to help individuals who become part of the governing body.

Senior Staff Team: Just as it is important to provide information about who is responsible for the leadership and direction of the RSL, it is important to be clear about who has responsibility for operational management. Profiles for the senior staff team should be similar in format to those for the GB and should include brief information about professional experience and background. Consideration should be given to providing contact details.

Organisational Structure: This will usually take the form of a chart and is intended to help people understand how service delivery is organised and what the lines of accountability are. The chart should contain details of the titles of posts rather than post-holders.

Relationship with Regulators: You should publish information about the extent to which you are a regulated body (this will extend beyond the SHR and could include OSCR, the Care Inspectorate etc). We recommend that you identify your regulatory status and what this means; where there is a Regulation Plan, you should either publish it or include a link to the SHR website. For support providers, you should either publish Care Inspectorate Reports or provide a link to the most recent reports. As a minimum, we suggest that you should publish the most up to date gradings for each registered establishment / service.

Entitlements, Payments and Benefits Policy: As well as publishing the policy, we recommend that you should include the schedule for payment / reimbursement that has been adopted by the governing body so that there is clarity about the levels of expenses that can be claimed. We also recommend that information is made available about how access to the Register will be provided: it may be that you make the register available for inspection at your office(s) during normal opening hours.

This is perfectly acceptable – as long as you also offer to provide a relevant extract by post for those who cannot easily visit the office. Where you offer an ‘inspection facility’, you must, of course, ensure that staff are appropriately trained to deal with such requests. All registers must be regularly updated and you should ensure that appropriate confidentiality is observed where necessary.

Salary Grades: The Scottish Information Commissioner expects information about salary and pay grades to be published as part of the Model Publication Scheme. For the reasons described in the section about confidentiality, we have not recommended a specific approach in this Framework. Instead, we recommend that
individual RSLs consider what information to publish and how to present it so that it is meaningful for those who are interested.

Many RSLs include charts and tables in their Annual Charter Reports that describe the proportion of annual spend that is attributable to salaries – if this is the case, it would be appropriate to refer any such enquiries to that source. If your organisation decides that it will publish information about pay and reward, it will be important to consult with staff and with stakeholders about the format to ensure that confidentiality isn't compromised and that information needs are likely to be met. It should be remembered that any payments to an individual that exceed £60,000 (based on accounting requirements at 2016) are recorded in the annual statutory accounts.

**Groups and Partnerships:** We recommend that information about the activities of any subsidiaries is published, together with their relationship to the RSL. This information should include details of the Directors and senior staff responsible for running the subsidiaries to ensure consistency with the information published about the parent.

We also recommend that you consider publishing information about any key partnerships with other agencies that the RSL is involved in (such as specific partnerships or initiatives with the local authority, health board, police etc – examples might include local authority and/or health board funding for Care and Repair; funding for fuel poverty reduction measures or community development projects such as allotments). Some of these examples are likely to be relevant too for the information that is recommended for publication in Category 3 and / or Category 4.

**Publication Category 2: How Key Decisions Are Made**

**The Role of the Governing Body:** We recommend that a chart or some other description is published to show how decisions are made; this should make clear the relationship between the governing body and any sub-committees and working groups, including Tenant Scrutiny Panels and other consultative groups. We recommend that the remits for the Governing Body and its sub-committees are published, together with the Scheme of Delegation and / or Standing Orders. Information about how to stand for election to the Governing Body should also be published here, together with details of any current recruitment priorities and the role descriptions for GBMs and office-bearers.

**Tenant Consultation / Engagement Arrangements:** Details of the membership of Tenant Scrutiny Panels should be published, as should information about any
Registered Tenant Organisations and how these groups ‘feed-in’ to the Governing Body and influence its decisions. We also recommend that there should be links to any ongoing consultation exercises with details of how to take part and that the results of any recent consultation exercises should be published, together with information about how you intend to take account of the views expressed. This will usually involve publishing information that has been prepared for meetings or for inclusion in tenant/resident newsletters. General information about how tenants and service users can get involved should also be published (or signposted) here.

**What Has Been Decided:** We recommend that information should be published in an appropriate format that makes it easy for people who are interested to find out what has been decided. As highlighted earlier in this document, we do not believe that publishing minutes is necessarily the best way of telling people what has been decided. Whatever approach to publication you adopt, the minutes should be available on request but we recognise that this might involve redacting (i.e. blocking out sections) or otherwise editing the minutes.

We do not recommend the preparation of two separate minutes – one for publication and one that is ‘internal’ – this introduces scope for misunderstanding and confusion. Instead we recommend that, if minutes are not published as a matter of course, as an alternative, a ‘decision report’ or summary is published. Some RSLs produce such information already for staff.

It is for individual RSLs to decide if they also wish to publish information about the decisions of sub-committees – this is may depend on the level of delegated authority that sub-committees have. If they have independent decision making power, organisations may take the view that a note of their decisions should also be published.

**Publication Category 3: Where the Money Comes From and How It’s Spent**

**Description of main source(s) of income:** We recommend that information is published that explains where the RSL’s main funding comes from in a style that is easy to understand. For most, this will mean rents and other charges such as factoring or service charges.

Many RSLs include very good information in their Annual Charter Report to Tenants and it would be appropriate, if this is the case, to include a link to the most recent report, as long as the information is then easy to find. The information that is most useful tends to be in the form of charts that often show proportions rather than amounts and which convey information about whether income is rising or falling.
Income information should, of course, be accompanied by comparable expenditure information that illustrates the main areas of spend, including investment in reserves and planned maintenance provision. Audited accounts should also be published but we believe that this is not the most accessible format to rely on in terms of publishing information in a format that is accessible to people who are interested in RSL activities.

We also recommend that information is published about any specific project funding that is received (e.g. for insulation projects or community gardening or furniture recycling or employment initiatives). Income for development activity can be published as project funding. As well as being informative, this information can help to quell any anxieties that might exist about the way in which rents are being spent.

In demonstrating value for money, we recommend that RSLs include signposting in this category to the relevant section of the Annual Report on the Charter. We do not believe that additional information needs to be developed to satisfy this Framework.

Publication Category 4: How We Provide Services

Services: We recommend that a full list of services is published and that, where possible, links are included to enable people to make contact and access the key services. Most of the websites that we reviewed included facilities for people to download an application form, make a complaint and some also offered the facility to report a repair.

Where it is not possible to access services directly via the website, information should be published about how to do so. We recommend that contact information for front-line staff is included (e.g. housing officers, maintenance assistants, welfare rights advisers). As already indicated, we are aware that some RSLs have pulled back from publishing direct dial telephone numbers because of their experience of direct marketing calls. We think it is for individual RSLs to balance the commitment to accessible services and openness with any such concerns when deciding on their own approach.

Publication Category 5: Who We Work With

Contractors: We recommend that information is published about the key contractors who provide services on your behalf so that tenants and service users are aware of who they are likely to be contacted about. It would be useful to include information to remind tenants and service users about the need to check identification before
letting tradespeople into their homes and to provide contact information at the RSL in the event of any concerns. The list of contractors supplied to staff and governing body members as part of the Entitlements Payments and Benefits policy could be used for this purpose.

**Regulated Procurement:** We recommend that information about the value, scope and duration of all regulated procurement contracts awarded during the last year should be published. It is for individual RSLs to decide if they want to publish additional information about procurement contracts awarded that fall below the regulated thresholds.

We recommend that the RSL’s Procurement Policy should be published, together with information for contractors who may be interested in tendering for work (e.g. signposting to the Procurement for Scotland Portal and/or information about any Framework Agreements that the RSL is party to).

**Publication Category 6: Our Standards: How We Measure and Report Performance**

We anticipate that the key source of information for this publication category will be the RSL’s Annual Report on the Charter, along with benchmarking information where available and relevant. It would also be appropriate to publish available information about any initiatives that are underway to address areas of identified weakness.

We recommend that information is published about how to complain about service delivery and that this category should include information about how complaints have influenced change and improvement (this is likely to be in the form of reports that have been prepared for the governing body or working groups and might also include Tenant Scrutiny Reports and Action Plans). We do not recommend the publication of individual complaints reports (unless there is an Ombudsman Report).

We do recommend the publication of external performance reports such as those by the Care Inspectorate for registered services (or signposting to them). Where possible, we also recommend the publication of the most recent Tenant Satisfaction Survey results (of course individual RSLs may also choose to publish the full Report) but smaller organisations especially may prefer to rely on the indicators and results contained in the Annual Report on the Charter.
Publication Category 7: Key Policies

We have recommended publication of the key policies that are consistent with the outcomes contained in the Scottish Social Housing Charter. This Publication Framework sets out a suggested minimum in terms of the policies that we recommend RSLs should publish and individual RSLs may decide to publish more. It is also important to be aware of the requirements of the EIRs when deciding which policies to publish.

The titles we have used may not match those of all RSLs and so the list in this Framework should be treated as an indication of the policy areas that should be covered in what you publish. We stress the importance of ensuring that published information is meaningful to people who are interested in finding out more about what RSLs do and how they go about their business. Some RSLs produce policy summaries and where these are available, they are likely to be useful additions to the recommendations of this Framework.

We have referred to the publication of Standing Orders in Publication Category 2. If these are not included in that category, we recommend that they should be published with the key policies identified in this Publication Category 7.

We recommend that, in addition to the policies listed in the Framework, a statement is included on your website that explains that there are a wide range of policies, for example, “In addition to our published policies we also have policies dealing with finance, human resources, asset management, health and safety, risk management etc. If you are interested in seeing any of these, please contact…”.

We remind you that there is no suggestion that information should be developed simply because it is listed in this Framework. If you do not already produce something that is included in this Framework, you cannot be expected to publish it (unless it is a legal requirement to do so).

Implementing the Framework

There is some work to be done when an organisation decides to adopt a Publication Framework and it is likely to take organisations some time to achieve. We strongly recommend the adoption of a “Day One” approach, where you decide when the Framework is going to be implemented and start to publish information from then, rather than trying to publish information retrospectively. We recommend that a senior member of staff is allocated lead responsibility for both the initial development and the ongoing maintenance and review of the Framework.
Here are some things to consider and some tasks to ensure are undertaken:

- Who is most appropriate to be the Publication Framework co-ordinator? (We recommend that this person should lead the initial implementation of your Publication Framework)
- What is the initial process for reviewing the Model, identifying potential variations and consulting with staff?
- How will you ‘audit’ what information is already available on your website and identify what should / could be added?
- Is your website able to accommodate your plans about adopting your Publication Framework?
- What is the process for adopting and publicising your Publication Framework?
- What timescale is appropriate for your organisation?
- How will the governing body be involved? (Governing body approval for your Publication Framework is essential)
- Who is the primary point of contact for people seeking to access information? (We recommend that these contact details feature prominently on your website and in your Publication Framework)
- Will you make a charge for providing information in a printed format? If so, how will the charging structure be developed, agreed and publicised?
- How will you ensure that new documents / publications / information are identified as being part of your Publication Framework? (We suggest that the drafting process that you follow includes specific consideration of whether the document falls into any of the information categories in your Publication Framework; similarly, your policy review schedules and calendars should identify those documents that are included in your Publication Framework)

Once adopted, your Publication Framework and the information that it contains need to be maintained. Since the intended primary means of accessing the information set out in this Publication Framework is via the internet, it is essential that there is clear responsibility for maintaining and updating your website. It is important that all information is up to date but, for certain categories of information, it is essential that information is made available within specified, reasonable timescales (which might be determined individually). Examples of where this is likely to be especially important are in respect of reporting the decisions of the governing body and posting performance information such as the ARC report.

On an ongoing basis, it will also be important to monitor use of the website and to identify whether there are any gaps in the information that you publish (indicated by additional requests for particular information) and the extent to which tenants and other service users’ satisfaction levels about how you keep them informed are
affected (as measured by the Charter indicators). We recommend that you review your Publication Framework annually to ensure that it continues to include all relevant information and is accessible to tenants, service users, stakeholders and any other people who are interested in what you do.

In implementing and monitoring your Publication Framework we recommend that you consider these practical issues:

- Who is responsible for keeping the information required by your Publication Framework up to date and accessible? (If responsibility is shared, who is responsible for co-ordination?)
- What are the timescales for posting information on the website?
- Who is responsible for monitoring access activity on the website and how is this reported and used by your organisation?
- Is your information equally accessible to people who are using mobile and fixed electronic devices?
- What is the volume of requests for printed information and for the opportunity to inspect information held on site (such as Registers)?
- Are the timescales that you operate for delivering printed information sufficiently short to ensure that people accessing information in this way are not unduly disadvantaged?
- Is the volume of work associated with managing and maintaining your Publication Framework reasonable and proportionate?

Style and Presentation

Whilst there are some particular issues relating to confidentiality in respect of specific categories of information, we think it is important to be aware more generally of how information might appear to a wide audience of readers. Of course, documents and publications should always appear professional in their style, content and tone but it might be that templates and house (or corporate) styles will be more rigorously applied following adoption of a Publication Framework to ensure consistency.

Timescales

This Model Publication Framework relates to making information publicly available, rather than how long documents should be retained. We believe that it is very important that the information published is current and up to date. Where information is included in your Publication Framework, we recommend that it should be published as soon as it is approved. It is for individual organisations to determine...
the most appropriate timescales for retaining information on their websites. It is important to be aware that there are both legal requirements and separate guidance\textsuperscript{23} that relate to the retention of documents (such as annual accounts, minutes etc.).

We think that it is reasonable for information to be available for the last two financial years and recommend that this should generally be the minimum period that information is available for, although individual organisations may decide to adopt a longer period either for everything or for specific items or categories of information.

It is expected that only the current version of a document will be available so, for example, if a policy that’s included in the Publication Framework has been reviewed within the last two years, it is only the current version that needs to be published on the website. It is, of course, important to bear in mind the maintenance obligations that are associated with a website that contains an extensive range of information that covers a long period. It is also important to remember that ‘retaining’ information doesn’t necessarily mean (or require) publishing it on your website.

While most information listed in this Framework will be available on the RSL’s website, it is appropriate that some is available for inspection or on request. Where this is the case (e.g. Membership Register), this framework makes this clear. This Framework also indicates where RSLs may choose how or when (e.g. in advance or retrospectively) to make information available.

\textsuperscript{2} SFHA Data Protection Briefing Note 2013
\textsuperscript{3} National Housing Federation Document Retention Guidance

Open All Hours? A Model Publication Framework and Guidance for Housing Associations and Co-operatives - September 2016
## Appendix A - The Model Publication Framework

<table>
<thead>
<tr>
<th>Information Category</th>
<th>What Should Be Available</th>
</tr>
</thead>
<tbody>
<tr>
<td>About Us: who we are and what we do (Charter Outcome 2)</td>
<td><strong>Descriptions of who you are:</strong> Vision. Values. Corporate Objectives; area(s) of operation; key activities; strategic / corporate plan(s)</td>
</tr>
<tr>
<td>Membership Register, Registers of Interests and of Gifts and Hospitality should be</td>
<td><strong>Location and Opening Arrangements:</strong> Address; telephone number for general enquiries (and dedicated lines where appropriate); opening times; contact arrangements; local / area office contact details</td>
</tr>
<tr>
<td>available for inspection at the RSL’s office during normal opening hours.</td>
<td><strong>List of Governing Body Members,</strong> including office-bearing responsibilities</td>
</tr>
<tr>
<td></td>
<td><strong>List of Senior Management Team,</strong> ideally including professional biography and contact details; organisational structure showing reporting arrangements</td>
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<tr>
<td></td>
<td><strong>Constitutional Documents: Rules / Articles:</strong> include FCA, SHR, OSCR and other Registration numbers</td>
</tr>
<tr>
<td></td>
<td><strong>Membership Policy</strong></td>
</tr>
<tr>
<td></td>
<td><strong>How to become part of the Governing Body</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Relationships with Regulators</strong> and statement about engagement level; Regulatory Status (and Regulation Plan if relevant)</td>
</tr>
<tr>
<td></td>
<td><strong>Codes of Conduct for Staff and GBMs</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Entitlements Payments and Benefits Policy</strong> (or equivalent, including arrangements for payments for expenses and subsistence)</td>
</tr>
<tr>
<td></td>
<td><strong>Group Details:</strong> information about e.g. subsidiaries if part of a</td>
</tr>
<tr>
<td>Information Category</td>
<td>What Should Be Available</td>
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</tr>
<tr>
<td>Group</td>
<td><strong>Key Partnerships:</strong> including with other associations or local authority(ies)</td>
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</table>
| How key decisions are made (Charter Outcome 2) | **Description of role of Governing Body:** governance structure chart (including sub-committees and working groups); remits for governing body and any sub-committees; information about levels of delegation to staff; standing orders  
**Tenant Consultation / Engagement Arrangements:** composition of Tenant Scrutiny Panel (or equivalent)  
**Consultation Reports:** (i.e. noting the outcome of any recent consultations with tenants/others)  
**Business Plan or summary**  
**Standing Orders and Financial Regulations**  
**What has been Decided:** minutes or notes of governing body meetings (as a minimum a summary of the decisions made should be published with the minutes available on request with confidential information redacted or blocked out) |
| Where the money comes from and how it’s spent (Charter Outcome 13) | **Description of funding sources:** income (anticipated to be rents, service and factoring charges) and expenditure information (including donations to other organisations) — in a form that’s accessible for those likely to be seeking information e.g. charts: the emphasis here should be on explaining how rental income is spent and what proportion of overall income it represents  
**Audited accounts**  
**Brief details of any project funding** and how it’s being spent |
<table>
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<tr>
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<tbody>
<tr>
<td></td>
<td>e.g. development funding, Big Lottery or charitable funding; energy efficiency funding</td>
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<td></td>
<td><strong>Capital works programme</strong> / plans information (annual programme figure)</td>
</tr>
<tr>
<td></td>
<td><strong>How we deliver Value for Money</strong> (included in Charter report)</td>
</tr>
<tr>
<td>How we provide services (Charter Outcome 4)</td>
<td>List of Services Provided</td>
</tr>
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<td></td>
<td><strong>Front Line Staff contact details</strong></td>
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<td></td>
<td><strong>How to</strong> report a repair; apply for a house; get information about tenancy support; make a complaint, speak to a housing officer etc</td>
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<tr>
<td></td>
<td><strong>How we consult</strong> with tenants and other customers to inform and improve service delivery and develop new services</td>
</tr>
<tr>
<td>Who we work with, including contractors and our agreements with them (Charter Outcome 4)</td>
<td><strong>Information about key service delivery contractors</strong> e.g. responsive repairs, landscape maintenance, planned / cyclical maintenance</td>
</tr>
<tr>
<td></td>
<td><strong>Information about regulated procurement contracts awarded</strong> (value, scope, duration); it would be possible to present this information as part of the ARC report</td>
</tr>
<tr>
<td></td>
<td><strong>Right to Repair Information</strong></td>
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<td></td>
<td><strong>Procurement Policy</strong></td>
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<td><strong>Information on how to tender for work</strong> (e.g. link to Procurement Portal)</td>
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<tr>
<td></td>
<td><strong>List of Suppliers and Contractors used by organisation</strong> (provided to staff under EPB Policy)</td>
</tr>
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<td></td>
<td><strong>Framework Agreements</strong></td>
</tr>
</tbody>
</table>

*Open All Hours? A Model Publication Framework and Guidance for Housing Associations and Co-operatives - September 2016*
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<tr>
<th>Information Category</th>
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</thead>
</table>
| How we measure and report performance (Charter Outcome 2) |ARC Report to Tenants  
Performance Standards  
KPIs and Performance Reports  
Benchmarking Information (where available and appropriate)  
Complaints Policy, Guidance and Forms  
Complaints Reports: or equivalent to show how complaints are handled and influence service delivery (aggregate reports rather than individual outcomes)  
Tenant Scrutiny Reports (if applicable) |
| Key Policies (Charter Outcomes 1 & 2)  
In deciding the key policies that should be publicly available, reference has been made to the Charter outcomes and to the EIRs. We advise that websites should carry a general statement that indicates the range of policies that are available on request / for inspection, in addition to those available directly from the website. |Allocations (Charter Outcomes 1,7,8,9, 10)  
Adaptations (Charter Outcomes 1& 5)  
Anti-Social Behaviour (Charter Outcome 6)  
Asbestos Management (EIR)  
Arrears Management (Charter Outcomes 7,8,9)  
Asset Management (including stock condition information) (EIR)  
Customer Care  
Data Protection  
Environmental Information (EIR)  
Equality and Diversity (Charter Outcome 1)  
Estate Management (Charter Outcome 6)  
Health and Safety (EIR)  
Legionnaires Inspection / Prevention (EIR)  
Procurement  
Risk Management (EIR)  
Rent Setting (Charter Outcomes 13,14,15)  
Repairs (Charter Outcome 5)  
Sustainability (EIR) |
<table>
<thead>
<tr>
<th>Information Category</th>
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<tbody>
<tr>
<td></td>
<td>Tenant Engagement (Charter Outcome 3)</td>
</tr>
<tr>
<td></td>
<td>Tenancy Sustainment (Charter Outcome 11)</td>
</tr>
<tr>
<td></td>
<td>We suggest that a general statement is also included to the effect of “If there is something that you are interested in seeing but isn’t included in this list, please contact us”</td>
</tr>
</tbody>
</table>
Acknowledgements

GWSF and SFHA would like to acknowledge:

- Linda Ewart, who was commissioned to produce this guidance

- Our Working Group of GWSF and SFHA members who provided extremely valuable feedback into the production of this guidance

- Our helpful discussions with the Scottish Housing Regulator and Scottish Information Commissioner, which aided our thinking in drafting the document