

# Transparency Policy

## 1. Introduction

- 1.1 We are committed to operating in an open and transparent way. We want to be accountable to our customers and stakeholders on how we operate and spend our money, and to demonstrate that we deliver value for money.
- 1.2 We share performance and expenditure information with our customers and stakeholders on the services we provide and their effectiveness. We will update this information at least once a year following the publication of our financial statements.
- 1.3 We want to share as much information as possible as long as it is appropriate, relevant and useful for our customers and stakeholders.

## 2. Purpose

- 2.1 We want to be open and transparent with our customers and stakeholders while recognising the importance of safeguarding personal and other sensitive information.

## 3. Policy

- 3.1 Information about us, our work, members and employees is available on request, unless there are good reasons of confidentiality, data protection or practicality why we can't supply this.

### 3.2 Publications

- 3.2.1 Our **financial statements** are published annually on our website and contain:

- financial statements;
- Group Chief Executive Officer salary package;
- any remuneration;
- any other regulatory or statutory reporting disclosures as required.

- 3.2.2 We will publish a summary annual report on the website highlighting key Board activities and performance from the previous year. This report is specifically aimed at customers and members of our Operations Committee to help us decide on relevant content.

### 3.3 Governance

- 3.3.1 A clear explanation of how we are governed is explained on our website, including member biographies.
- 3.3.2 Terms of reference for the Board and Committees are also on the website, detailing their responsibilities, membership and procedural matters.

- 3.3.3 Agendas for Group Board, Arcon Board and Operations Committee, together with any governance vacancies are published on our website. All Board and Committee meetings, including those of our subsidiaries are closed. This means that they will not be open to the public and will be restricted to members, shareholders and relevant officers of the Group being in attendance. As a consequence, the minutes of those meetings are not published. However, upon request any minutes or reports of a non-confidential nature could be shared in accordance with the protocols for Board and Committee working policy.
- 3.3.4 Registers of Interests are maintained for all Board and Committee members. These registers are available upon request.

### **3.4 Information availability**

- 3.4.1 We have a website that provides a wealth of information about our services, performance, value for money, the people involved in the business of the Group and much more.
- 3.4.2 We actively share information through social media channels, such as Facebook and Twitter.
- 3.4.3 We publish an **annual report to customers** on our website providing information on:
- how we are performing;
  - how each pound (£) of rent is spent;
  - how customers can get involved in their communities and the organisation;
  - details of projects carried out throughout the year;
  - members of the Customer Scrutiny Groups;
  - repairs and maintenance budgets.
- 3.4.4 All **customer facing policies and strategies** are made available on the website and include the following:
- resident and community engagement strategy;
  - domestic abuse policy;
  - data protection policy;
  - complaints policy;
  - tenancy policy;
  - compensation and redress policy;
  - value for money strategy.
- 3.4.5 Our **annual report and financial statements** made available on the website, detail the following:
- pay remuneration for key management personnel (the Executive Officers);
  - operational achievements over the last 12 months;
  - statement of Board's responsibilities;
  - operating review and performance in the year;
  - the main risks which have been monitored and managed over the past year;
  - statement of cash flows;
  - our turnover, operating costs and operating surplus.
- 3.4.6 Each year, we update and publish **our plan** (business plan) available on our website, which sets out our strategic direction for the coming five years and includes:

- what we are working to achieve;
- our operating environment;
- our structure, assurance and monitoring arrangements;
- how we meet our financial and performance goals, and address risks.

3.4.7 Our group **development strategy** is also published on our website, which sets out our approach to building new homes and how we are meeting the housing needs of existing and future customers.

3.4.8 Each year, we publish a **value for money statement** (VFM) on our website, which provides details of:

- VFM gains;
- a review of costs and performance;
- how income is allocated;
- our performance management framework;
- asset management strategy and development;
- development and growth;
- social value;
- repairs and maintenance;
- empty properties;
- the performance of our subsidiaries;
- our next steps in generating VFM.

### **3.5 Other published information**

3.5.1 We will also publish on our website payments over £500 that are directly relating to development projects part of the affordable homes programme 2015-2018.

3.5.2 We provide our customers with the following health and safety information:

- guidance is posted in all communal areas detailing what to do in case of fire, loss of water supply, discovery of asbestos and the service provided by the caretaking service;
- details of any asbestos in the property on request following a survey;
- information regarding any works in communal areas;
- fire risk assessments on request;
- leaflets are available on our website providing:
  - tips on keeping your water supply safe and healthy;
  - asbestos in your home;
  - fire safety in your home;
- gas safety certificates are provided to all customers at the start of their tenancy and annually thereafter.

3.5.3 Information is made available in alternative formats on request and we always aim for the most value for money method of communication.

### **3.6 Information which will not be disclosed. Typically, this will be if it:**

- is commercially sensitive;
- relates to expenditure (except as listed above);
- weakens our competitive position;

- may give a prospective tenderer for goods or services an advantage;
- relates to proposed terms for the acquisition or disposal of property;
- is the terms of a contract;
- is confidential information where there is a contractual or legal requirement not to disclose;
- is information about individuals including employees (past, current or prospective), tenants (current or former), other residents and applications for accommodation;
- relates to legal or other investigations; or
- relates to court records.

3.6.1 This is not an exhaustive list and there may be other information which we also will not disclose.

### 3.7 Customer engagement and influence over decision making

We want more customers to give us feedback to help improve the service we provide. There are different ways they can do this and a range of opportunities for customers to become engaged, and have a real say in the management of their homes and the housing service. They include:

- **Tenants and resident associations (TRAs)** - are groups of local people who take an active part in improving their local community.
- **Customer scrutiny group** – is a group of engaged customers, who actively investigate, challenge and make recommendations to improve our service delivery.
- **Bolton at Home voices** – will have a wide variety of methods with which to influence policy and service delivery, including digital, face to face, telephone voices and social media.
- **Community investment and UCAN centres**– the community investment programme provides opportunities for self-development and local community development. Customers can access support for digital inclusion, employment and education, health and wellbeing and a wide variety of arts based activities.

## 4. Equality analysis

4.1 Diversity is about respecting the differences of our customers, service users and staff; ensuring that all people that come into contact with us experience the same high standards of behaviours and service. This policy reinforces this by:

- ensuring that services, staff and information can be easily accessed through a variety of contact points and communication channels; and
- emphasising the importance of tailoring communication to the individual needs and preferences of our customers.

## 5. Data protection

5.1 Individuals have rights, subject to exemptions, under the DPA and GDPR including the following:

- to make a subject access request to Bolton at Home for a copy of their personal data; and

- to make a data portability request that Bolton at Home provide them with their personal data and, where possible, transmit that data directly to another data controller.

5.2 Individuals should contact the Information Governance Team (IGT) via [IG@boltonathome.org.uk](mailto:IG@boltonathome.org.uk) in respect of exercising their rights under the DPA and GDPR. Where the request is submitted to another Bolton at Home service, that service will promptly forward such requests to the IGT immediately or as soon as reasonably practicable within 24 hours via [IG@boltonathome.org.uk](mailto:IG@boltonathome.org.uk). Our handling of such requests will be in accordance with statutory requirements, other related policies and procedures, and relevant Information Commissioner's Office (ICO) guidance.

## 6. Consultation

This policy was developed in consultation with Bolton at Home's Operations Committee and Bolton at Home's Scrutiny Group.

## 7. Related policies

- Data protection policy and other Information Governance policies.
- Marketing and Communication guidelines.

## 8. Monitoring, review and evaluation

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 a charitable Community Benefit Society. We do not constitute a public authority under the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR), and therefore, we are not obliged and we will not respond to, requests under such legislation as a matter of course. However, customers and stakeholders are able to consider corporate information that we have chosen to make publicly available (see Clause 3). Customers and stakeholders who would like independent advice in regard to our status under the FOIA and EIR may wish to contact the [Information Commissioner's Office](#), which is the regulator for this legislation, by writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or [casework@ico.org.uk](mailto:casework@ico.org.uk).

8.3 The effectiveness of this policy will be monitored through:

- Customer satisfaction surveys;
- Complaints feedback;
- Feedback from operations committee and scrutiny.

<b>Date approved</b>	Group Board 16 January 2020 Arcon Board 11 May 2021
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