



TRANSPARENCY POLICY

Status: Board approved

Date: February 2019

1. Introduction

- 1.1 PCH is committed to being open and accountable in its work. This policy has been adopted so that residents, staff and the wider community can be aware of how the organisation works and makes decisions.
- 1.2 This policy sets out the basis on which PCH will be open to external and internal scrutiny.
- 1.3 We also encourage employees or others with serious concerns about any aspect of our work to come forward and express them, which can be done by following our guidelines on whistleblowing.

2. Principles

- 2.1 PCH recognises the legitimate interest of those who are affected by its activities and the way it conducts its business. This includes:
 - Residents and their representative bodies
 - Those who want to become residents
 - Other service users
 - Staff and their representative bodies
 - Partner organisations and agencies
 - Contractors and suppliers
 - Regulators
 - Anyone living in the neighbourhoods where PCH operates
 - Organisations working for the benefit of the neighbourhoods where PCH operates and the communities affected by their work
- 2.2 PCH accordingly acknowledges that information about the way that it works, the decisions it makes and the performance it achieves will be important in supporting the interests of these groups, helping it to work in partnership and to be more widely accountable.
- 2.3 Our approach to transparency is guided by the principles in our communications strategy which are that all PCH communications will:
 - Be driven by customer needs, the Strategic Business Plan and the brand
 - Have a clear purpose – what we want people to understand, feel or do
 - Be tailored to suit the target audience
 - Be ethical and respectful, in-keeping with our values

- Be as accessible as possible to meet our audiences' needs
- Be honest and straight-forward
- Be personable and in Plain English
- Be branded and look professional
- Be responsive and timely

3. Publications

3.1 We publish and provide information in different ways and formats to meet the needs of our customers. The main source of information is our website but we may print some documents such as leaflets and newsletters. We also use social media channels such as Twitter, Linked In and Facebook.

3.2 PCH publishes the following documents which support the above principles including:

- The Strategic Business Plan
- PCH Financial accounts and Value for Money statement (every year)
- Residents' Annual Report (every year)
- In Touch newsletter (four issues per year)

3.3 Information about PCH as an organisation

- The vision and values
- Strategic objectives setting out the direction for PCH
- Our digital ethics

3.4 Information about our services

- Our service standards, performance and plans
- Information on our services and how we manage our properties
- Plans for major repairs and improvements to homes in each area
- Regular tenants' newsletters providing information about what is happening locally and what is planned for the future
- The policies adopted to guide decision making about service delivery to customers
- Publish customer feedback procedures and their outcomes
- Tall building fire risk assessments

3.5 Financial information and value for money

- Annual Financial Statements
- Remuneration information about the Board and the Executive Management Team
- Gender pay reporting information
- Information on Value for Money (included in our Financial Statements) and the Annual Report to Tenants
- Details of expenditure over £500 on Development or other Government funded work

3.6 Information about how we are governed

- A clear explanation of how we are governed. This includes:
 - Our Board members and Executive Management Team, including their biographical details and photographs
 - Information on any interests our Board members have declared such as directorships of other companies
- Summaries of our Board meetings and copies of PCH Board minutes (confidential and commercially sensitive information will be redacted)
- A range of policies relating to conduct and probity, including:
 - Expenses
 - Gifts and hospitality
 - Our approach to fraud, money laundering and bribery
 - Modern day slavery
 - Transparency
- Information about our approach to Resident Scrutiny

4 Information requests

- 4.1 Individuals and groups can request information about PCH that is not routinely published. Information will not normally be withheld unless it falls into the categories set out below or there are other specific reasons not to disclose.
- 4.2 Although we have chosen to adopt an open approach we are not classed as a public authority for the purposes of the Freedom of Information Act (FOI) and are therefore not bound by it. Our approach to FOI requests follows the above guidelines.
- 4.3 In some cases we will not provide information requested. This is likely to be the case where:
- It would involve disclosing personal information to a third party as defined by the Data Protection Act
 - The information is considered to be confidential or commercially sensitive
 - The information is in draft form
 - Disclosure is prevented by law
 - The information is not readily available/is difficult to access.
- 4.4 Written requests for information will be acknowledged within 3 working days from receipt of the request, and, if there is no reason not to disclose, the information will be provided within 20 working days. If it is unclear exactly what information is requested, we will ask for clarification or further information within 10 working days. Once this information is received, we will respond within 20 working days unless it falls within the categories below.
- 4.5 Requests for personal information under the Data Protection Act will be dealt with within the statutory timescales of up to one calendar month.

- 4.6 Members of the media can request information that is in the public interest from PCH through the Communications Team who will, wherever possible and appropriate, respond to such requests within required deadlines either by written statement or by interview with the relevant senior member of staff.

5 Board Meetings

- 5.1 Meetings of the board and its committees, are not open to the public. A schedule of board and committee meetings will however be published on the website.
- 5.2 Anyone wishing to observe for a legitimate reason may at the discretion of the chair of the meeting be invited to attend. This is subject to the request being received by the Head of Governance and Standards at least 2 days before the meeting is scheduled to take place.
- 5.3 Observers will not be given papers relating to confidential matters nor be present during consideration of such items.
- 5.4 As part of PCH's approach to succession planning and recruitment of board members it has developed separate policies and arrangements to support people who are involved in a process to become board members in the future and that can include observation of meetings.

6 Accountability

- 6.1 PCH has and will continue to implement strategies for the active promotion of its accountability to residents, other stakeholders and the wider community.
- 6.2 In furtherance of this objective PCH will:
- Publish an annual report of the Associations activities and performance, and performance against the RSH standards
 - Have in place a strategy for communicating information about its work to its stakeholders.
 - Promote the work of the formal Resident Scrutiny structures Involve customers in reviewing, monitoring and developing services taking their views into account
 - Regularly survey customer satisfaction through the use of questionnaires, focus groups and other recognised techniques and report the outcomes to board members as well as providing feedback to customers.
 - Attend and address meetings of resident groups, its local authority partners and any other organisations upon request to give an account of its work and performance.
- 6.3 PCH will also actively support a programme of training and development for residents to further their skills, knowledge and understanding of the business so that they may participate in a range of residents' panels, focus groups or other customer feedback opportunities such as mystery shopping.