



PUBLICATIONS FRAMEWORK

MARCH 2017

This Consultation Document is for HHP Tenants and Registered Tenant Organisations

PREFACE

In the interests of openness and transparency, HHP makes a large amount of information available to the public via its website and also at its offices in Stornoway and Balivanich. The Publications Framework at Appendix 1 was drafted in order to make Tenants aware of all the information they can access, and where it might be accessed. The consultation seeks feedback from Tenants in respect of the content of the Framework and the method of access.

Why are we consulting you?

HHP aims to provide opportunities for all those who wish to express their opinions on a proposed area of work, or on an aspect of the housing sector that impacts on the Partnership's work. It aims to do so in ways that will inform and enhance that work.

Typically consultations involve a consultation paper inviting answers to specific questions or more general views about the material presented. The views and suggestions detailed in consultation responses will be analysed and used as part of the decision making process for the development of a particular policy/document.

This consultation is primarily aimed at:

- Tenants; and
- Registered Tenant Organisations

What we would like you to do

The consultation period began on 13 March 2017 and it runs until 10 April 2017. If you wish to respond to this consultation, please ensure that your response is returned to **Angela Smith** by **10 April 2017**. There is a response form at Appendix 2.



DRAFT PUBLICATIONS FRAMEWORK

Section	Executive
Date Policy Approved by Board	
Review Period	
Review Due	
Version	1.0

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DOCUMENT CHANGE HISTORY

The following interpretation and abbreviations are used in this document:

Version	Change Applied	Date	By
1.0	Framework document created following publication of <i>Open All Hours: A Model Framework and Guidance for Housing Associations & Co-operatives</i>	1 February 2017	Angela Smith

INTERPRETATIONS & ABBREVIATIONS

Word	Interpretation
HHP or Partnership	Hebridean Housing Partnership
Board	Means the Board of the Hebridean Housing Partnership
Board Members	All Members of the Board including co-opted Members
Charter	Scottish Social Housing Charter
CPP	Community Planning Partnership
EIRs	Environmental Information (Scotland) Regulations 2004
Equalities Act	Equalities Act 2010
FCA	Financial Conduct Authority
FES	FES FM Ltd , HHP's Repair & Maintenance contractor
FOISA	Freedom of Information (Scotland) Act 2002
Framework	HHP's Publication Framework
GWSF	Glasgow and West of Scotland Forum of Housing Associations
OFGEM	The Government regulator for gas and electricity markets in Great Britain
OSCR	Office of the Scottish Charity Regulator
RTO	Registered Tenant Organisation
SFHA	Scottish Federation of Housing Associations
TIG	Tighean Innse Gall
TPAS	Tenant Participation Advisory Service
VFM	Value for Money
All references to the masculine gender in this policy shall read as equally applicable to the feminine gender	

PUBLICATIONS FRAMEWORK

INTRODUCTION

- 1.1 This Framework document clarifies HHP's position in respect of the information it will make available to the public, where the information can be accessed, and for how long it will remain in the public domain.
- 1.2 The Partnership's Publication Framework consists of this policy document which outlines HHP's approach to making information publicly available, and its appendix which details different categories and types of information, and where they are located or how they might be accessed. HHP's Framework sets out, as the Model Framework recommends: *"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"*.

PURPOSE

- 2.1 The purpose of this Framework is to outline the information the Partnership makes available to interested parties and to demonstrate HHP's commitment to being open and transparent about the activities it undertakes, how they are planned and funded, the policies and strategies that underpin that work, and the governance and decision making arrangements that support this.

GEOGRAPHICAL CONSIDERATIONS

- 3.1 Where parts of the Framework are in hard copy, they will be will be available in both HHP offices.

FORMAT FOR PUBLISHING INFORMATION

WEBSITE

- 4.1 The Partnership will utilise its website (www.hebrideanhousing.co.uk) to make as much information available as possible in the first instance, and all staff should become familiar with its contents so that enquiries may be directed to the correct part of the website accordingly.
- 4.2 Much of the information recommended for publishing in the Framework is already on the website in some capacity. For the most part it will be sufficient that it remains where it currently is on the website if its location is clearly signposted or linked, rather than moving all pieces of the Framework into one centralised location. For those items that are being published for the first time, they will be placed appropriately. Where there is no 'most appropriate place', a new page entitled 'Other Information You Might Find Useful' will be created for this purpose.
- 4.3 The website address is currently published and promoted on all information issued by the Partnership. In instances whereby bulk purchases have been made of, for example, forms, and there is considerable stock remaining that has not been marked with the website address, the stock will be used up and the next printing will be updated.
- 4.4 The website will be as accessible and equally easy to navigate when accessed from mobile devices as from a PC. Tabs and signposts within the website will be clear and logical.

- 4.5 In accordance with the Equalities Act any specific needs of people with disabilities will be addressed.
- 4.6 Where an individual has requested information in a specific format, the Partnership will do its best to provide the information in that format if it is already in use within the Partnership, or the request and suggested format is reasonable.

COPYRIGHT

- 4.7 All published information belonging to HHP will be marked with the copyright symbol © from 1 February 2017.
- 4.8 The following statement will be published on the website in respect of consents required prior to copying any information therein:

This website and its content is copyright of Hebridean Housing Partnership - © Hebridean Housing Partnership 2017. All rights reserved.

Any redistribution or reproduction of part or all of the contents in any form is prohibited other than the following:

- You may print or download to a local hard disk extracts for your personal and non-commercial use only; or
- You may copy the content to individual third parties for their personal use, but only if you acknowledge the website as the source of the material.

You may not, except with Hebridean Housing Partnership's express permission, distribute or commercially exploit the content. Nor may you transmit it or store it in any other website or other form of electronic retrieval system.

- 4.9 In order to protect third party material on the Partnership's website, consents must be sought from the owner. HHP cannot give copyright consent to reproduce material on behalf of the third party.

MINUTES

- 4.10 The Partnership makes minutes of meetings available once they have been approved.

ENVIRONMENTAL INFORMATION REGULATIONS (EIRs)

- 4.11 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. The Partnership will publish such information should it fall within the normal operation of this Framework.

PUBLICISING THE FRAMEWORK

- 5.1 The Framework's categories of information at Appendix 1 will be displayed in the Customer Service areas of both the Stornoway and Balivanich offices.
- 5.2 There will be an article on the Framework in the Spring 2017 newsletter to advise all tenants of its adoption.
- 5.3 The following statement will appear prominently on HHP's website:

As part of our commitment to openness and transparency, Hebridean Housing Partnership has adopted a Publication Framework that sets out the range of information that we publish. Our Publication Framework complies with legal requirements and is based on the Model Publication Framework promoted by the Scottish Federation of Housing Associations and the Glasgow and West of Scotland Forum of Housing Associations.

CATEGORIES OF INFORMATION

- 6.1 There are 7 categories of information in the Partnership's Framework, which correspond to and support the way the Partnership responds to several Scottish Social Housing Charter outcomes. These categories will include all the information listed in Appendix 1, and will also be subject to the considerations below.

CATEGORY 1 - ABOUT US: WHO WE ARE AND WHAT WE DO

- 6.2 **Contact details:** contact details for the Partnership will be available on the website.
- 6.3 **Board Members:** names and profiles of Board Members will be available on the website, including length of service, any experience that is relevant to their role, and category of membership.
- 6.4 **Membership of HHP:** there will be guidance on how interested parties can become a Member of HHP, the benefits of doing so, and how the Partnership's Register of Members may be accessed.
- 6.5 **Board Membership:** guidance on how a Member might join the Board will be available, in addition to training and support for Board Members.
- 6.6 **Executive Team:** profiles and contact details will be published on the website.
- 6.7 **Organisational Structure:** this will be a chart of the Partnership's staff structure - posts as opposed to names - and is included to help interested parties understand how service delivery is organised, in addition to lines of accountability.
- 6.8 **Relationship with Regulatory Bodies:** a link to HHP's Regulation Plan from the Scottish Housing Regulator will be made available on the website.
- 6.9 **Entitlements, Payments & Benefits Policy:** in addition to publishing the Policy, levels of reimbursement for expenses will also be available, along with the register which will be accessible at each office during normal office hours via Governance Staff in Stornoway and the Area Manager in Uist.

CATEGORY 2 - HOW KEY DECISIONS ARE MADE

- 6.10 **The Role of the Board:** a chart will be made available to outline how decisions-making flows. This will include relationships between sub-committees, working groups, and Registered Tenant Organisations (RTOs). Board vacancies will also be published as soon as they arise.
- 6.11 **Strategic Information:** the Business Plan will be published.
- 6.12 **Tenant Engagement/Consultation/Participation:** Registered Tenant Organisation (RTO) contacts will be published with information on how to get involved, in addition to any tenant scrutiny information. HHP will outline any consultation exercises in this area, how to take part, and feed back how views expressed were taken account of.

- 6.13 **What has been decided:** minutes and decision reports will be published for Board. Private and confidential information, and personal information, will never be made public.

CATEGORY 3 - FINANCIAL MATTERS: WHERE THE MONEY COMES FROM AND HOW IT IS SPENT

- 6.14 **Description of the main source of income:** audited accounts are made available annually which contain full financial disclosures re income and expenditure. A simplified version with plain English descriptions is also made available through the newsletter and in the public Board papers. Clearer links to both will be included on the website. Charts with falling, rising and proportional income and expenditure will be developed for the monthly Performance Report.
- 6.15 The Annual Charter Report will continue to include performance against financial indicators, and information on Value for Money. This is published on the website every year.
- 6.16 Any specific project funding that is received will be published.

CATEGORY 4 - HOW WE PROVIDE SERVICES

- 6.17 **Services:** a full list of services offered by the Partnership will be developed and published, i.e. allocations, repairs, gas servicing, maintenance, tenancy support, factoring etc. Within this list, links to key contacts and frontline staff will be highlighted.
- 6.18 Where it is not possible to access services directly on the web, clear and straightforward information will be published about how this might be done.

CATEGORY 5 - WHO WE WORK WITH INCLUDING CONTRACTS AWARDED AND CONTRACTOR LISTS

- 6.19 **Contractors:** the Partnership will publish information in respect of who the main contractors are, and their sub-contractors. There will also be a reminder to tenants and service users to check ID prior to admitting any tradesperson into their homes.
- 6.20 **Regulated Procurement:** the value, scope and duration of all regulated procurement contracts awarded during the last financial year will be published at the end of that year.
- 6.21 **The Partnership's Procurement Policy** and annual Framework will be published with information for contractors who might be interested in tendering for work, including a link to the Procurement for Scotland Portal.

CATEGORY 6 - OUR STANDARDS - HOW WE WILL REPORT PERFORMANCE

- 6.22 The Partnership will report annual performance via the Tenant Report following completion of Charter and benchmarking data. In addition, a monthly Management and Performance summary will be published by the 15th day of each calendar month.
- 6.23 The Partnership will also publish the outcome of its self-assessment activities following their completion.
- 6.24 The Partnership will publish the outcome of any survey such as regular Tenant Satisfaction Surveys.
- 6.25 External performance reports such as those by the Care Inspectorate, or OFGEM will be published.
- 6.26 Information about how to complain about the Partnership's service delivery will be prominently displayed on the website with a statement to say that complaints are

welcomed, will be responded to in full, and the outcome will be published. How complaints have influenced or improved service delivery will be highlighted.

CATEGORY 7 - KEY POLICIES

- 6.27 HHP will publish key policies that are consistent with the outcomes in the Charter, in addition to any policies that might be of interest to tenants and service users i.e. those that are frequently requested.

IMPLEMENTING THE FRAMEWORK

AUDIT OF INFORMATION

- 7.1 An audit of information currently available to the public was undertaken in December 2016 and a draft Framework was composed.

CONSULTING ON THE DRAFT

- 7.2 The draft Framework will go out to staff, the Forum, and RTOs for a consultation period in February/March 2017 to gauge views on the amount and type of information included in the Framework.

WEBSITE READINESS

- 7.3 While the consultation period is running, the website will be prepared for the new publications it will host, in addition to any recommendations regarding direct links to staff, or in respect of services offered.

BOARD DECISION

- 7.4 Following this, the Board will be asked to take a view on whether to approve the Framework at the May 2017 Board meeting.
- 7.5 If the Board approves the Framework, the Partnership will adopt a 'Day One' approach to its implementation, whereby items will be published on the Framework from that point onwards.

PUBLICATION CO-ORDINATOR

- 7.6 The Corporate Governance Manager will be the Publication Framework Co-ordinator and the primary point of contact for interested parties seeking information, as this is closely aligned to other areas within the remit of that post. In the absence of the post-holder the Corporate Governance Officer will deputise.

CHARGING FOR PRINTED MATERIALS

- 7.7 Data Protection guidance states that it is reasonable to make a small charge (up to £10.00) which covers staff members' time and the costs of printing when requesting information in hard copy. The Board will be asked to agree a charging structure based on these principles, but based on staff members' time alone, and it will be publicised on the website.

ADDING TO AND MAINTAINING THE FRAMEWORK/WEBSITE

- 8.1 When new documents/publications/information are in the drafting process, consideration should be given as to whether they fall into any of the categories in the Framework. If so, then permission should be sought from the Chief Executive for their inclusion.
- 8.2 Permission for publication on the website should be sought from the Chief Executive, then the document should be passed to the IT officer for upload, and the Publication Register updated accordingly.

- 8.3 The IT Officer will take responsibility for updating the website, and the Publications Co-ordinator will be responsible for getting the information to the IT Officer in good time. In the IT Officer's absence, the Corporate Resources Manager will update the website.

TIMESCALES

- 9.1 Timescales for the availability of information on the Framework should be agreed by the Board and adhered to. Generally once an item has been approved for inclusion on the Framework it should be uploaded and made available.
- 9.2 At the point of inclusion on the Framework, a timeframe should be agreed for how long the information should be available, and the Publication Register updated to reflect this. Once the timeframe has passed the Publication/information should be archived electronically.
- 9.3 A steer may be taken from retentions schedules in respect of how timescales may be prioritised, but the website will contain less static information than planned for in the retention schedules, so it will largely be on a category of publication basis.

MONITORING AND REVIEW

- 10.1 The operation of this Framework will be monitored by the Board.

APPENDIX 1

INFORMATION ABOUT HHP & WHERE YOU CAN FIND IT

CATEGORY & INFORMATION TYPE	WHERE IT IS LOCATED / TO BE LOCATED	RESPONSIBLE POST
ABOUT US: WHO WE ARE AND WHAT WE DO (CHARTER OUTCOME 2)		
Descriptions of what HHP is: Vision, Values, Corporate Objectives; area(s) of operation; key activities; strategic / corporate plan(s)	Website - about us tab	Chief Executive
Location and Opening Arrangements: Address, telephone number for general enquiries (and dedicated lines where appropriate), opening times, contact arrangements, local / area office contact details	Website - front page	Corporate Resources Manager
List of Governing Body Members: including office-bearing responsibilities	Website - What is HHP tab	Corporate Governance Manager
Executive Team: brief biography and contact details, organisational structure showing reporting arrangements	Website - What is HHP tab	Chief Executive
Management Team - brief biography and reporting arrangements	Website - What is HHP tab	Directors
Registers - Membership Register, Registers of Interests, Gifts and Hospitality Register	Available for inspection at HHP's offices during normal opening hours	Corporate Governance Manager
Constitutional Documents: Rules: include FCA, SHR, OSCR and other Registration numbers	Website - Corporate tab	Corporate Governance Manager
Membership Policy	Website - Corporate tab	Corporate Governance Manager
How to become part of the Governing Body	Website - Corporate tab	Corporate Governance Manager
Relationships with Regulators and statement about engagement level; Regulatory Status (and Regulation Plan if relevant)	Website - What is HHP tab	Chief Executive
Codes of Conduct for Staff and Board Members	Website - Publications & Downloads tab	Corporate Governance Manager

CATEGORY & INFORMATION TYPE	WHERE IT IS LOCATED / TO BE LOCATED	RESPONSIBLE POST
Entitlements Payments and Benefits Policy (or equivalent, including arrangements for payments for expenses and subsistence)	Website - Publications & Downloads tab	Corporate Governance Manager
Group Details: information about e.g. subsidiaries if part of a group	Website - Corporate tab	Corporate Governance Manager
Key Partnerships: including with other associations or local authority(ies)	Website - Corporate tab	Corporate Governance Manager
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	Website - Corporate tab	Corporate Governance Manager
Tenant Consultation / Engagement Arrangements	Website - Tenants & New Customers tab	Director of Operations
Consultation Reports (i.e. noting the outcome of any recent consultations with tenants/others)	Website - Tenants & New Customers tab	Corporate Governance Manager
Business Plan or summary	Website - Publications & Downloads tab	Chief Executive
Standing Orders and Financial Regulations	Website - Publications & Downloads tab	Corporate Governance Manager
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)	Website - Corporate tab	Corporate Governance Manager
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	Website - Corporate tab	Director of Finance and Corporate Resources

CATEGORY & INFORMATION TYPE	WHERE IT IS LOCATED / TO BE LOCATED	RESPONSIBLE POST
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 - Annual Report	Website - Publications & Downloads tab	Director of Finance and Corporate Resources
Brief details of any project funding and how it's being spent e.g. development funding, Big Lottery or charitable funding; energy efficiency funding	Website - Corporate tab	Director of Finance and Corporate Resources
Capital works programme / plans information (annual programme figure)	Website - Corporate tab	Director of Finance and Corporate Resources
How we deliver Value for Money (included in Charter report)	Website - Tenants & New Customers tab	Director of Finance and Corporate Resources
HOW WE PROVIDE SERVICES (CHARTER OUTCOME 4)		
List of Services Provided	Website - Tenants & New Customers tab	Director of Operations
Front Line Staff contact details	Website - home page	Director of Operations
How to report a repair; apply for a house; get information about tenancy support; make a complaint, speak to a housing officer etc	Website - Tenants & New Customers tab	Director of Operations
How we consult with tenants and other customers to inform and improve service delivery and develop new services	Website - Tenants & New Customers tab	Director of Operations
WHO WE WORK WITH, INCLUDING CONTRACTORS AND OUR AGREEMENTS WITH THEM (CHARTER OUTCOME 4)		
Information about key service delivery contractors e.g. responsive repairs, landscape maintenance, planned / cyclical maintenance	Website - Tenants & New Customers tab	Director of Operations
Information about regulated procurement contracts awarded (value, scope, duration); it would be possible to present this information as part of the ARC report	Website - Corporate tab	Procurement Team

CATEGORY & INFORMATION TYPE	WHERE IT IS LOCATED / TO BE LOCATED	RESPONSIBLE POST
Right to Repair Information	Website - Tenants & New Customers tab	Director of Operations
Procurement Policy	Website - Corporate tab	Corporate Governance Manager
Information on how to tender for work (e.g. link to Procurement Portal)	Website - Corporate tab	Procurement Team
List of Suppliers and Contractors used by organisation (provided to staff under EPB Policy)	Website - Publications & Downloads tab	Procurement Team
Framework Agreements	Website - Corporate tab	Asset & Contracts Manager
ARC Report to Tenants	Website - Publications & Downloads tab Also sent out in hard copy	Corporate Governance Manager
Performance Standards	Website - Corporate tab	Corporate Governance Manager
KPIs and Performance Reports	Website - Corporate tab	Corporate Governance Manager
Benchmarking Information (where available and appropriate)	Website - Corporate tab	Corporate Governance Manager
Complaints Policy, Guidance and Forms	Website - Publications & Downloads tab	Service Development Manager
Complaints Reports: or equivalent to show how complaints are handled and influence service delivery (aggregate reports rather than individual outcomes)	Website - Tenants & New Customers tab	Service Development Manager
Tenant Scrutiny Reports (if applicable)	Website - new page	Service Development Manager

CATEGORY & INFORMATION TYPE	WHERE IT IS LOCATED / TO BE LOCATED	RESPONSIBLE POST
KEY POLICIES (CHARTER OUTCOMES 1 & 2)		
<p>Allocations (Charter Outcomes 1,7,8,9, 10)</p> <p>Anti-Social Behaviour (Charter Outcome 6)</p> <p>Asbestos Management (EIR)</p> <p>Arrears Management (Charter Outcomes 7,8,9)</p> <p>Asset Management (including stock condition information) (EIR)</p> <p>Communication</p> <p>Data Protection (covered in Communication Policy)</p> <p>Environmental Information (EIR) (to be developed)</p> <p>Equal Opportunities (Charter Outcome 1)</p> <p>Estate Management (Charter Outcome 6)</p> <p>Gas Management</p> <p>Health and Safety (EIR)</p> <p>Procurement</p> <p>Risk Management (EIR)</p> <p>Rent & Service Charges (Charter Outcomes 13,14,15)</p> <p>Repair & Maintenance (Charter Outcome 5)</p> <p>Tenant Participation Strategy (Charter Outcome 3)</p> <p>Tenancy Sustainment (Charter Outcome 11)</p> <p>If there is something that you are interested in seeing but isn't included in this list, please contact us.</p>	<p>Website - Publications & Downloads tab</p>	<p>Corporate Governance Manager</p>



CONSULTATION RESPONSE FORM

PUBLICATIONS FRAMEWORK

MARCH 2017

No.	QUESTION	RESPONSE	
1	Do you agree with the content of the proposed Publication Framework?	YES	NO If no, please give a reason for your response:
2	Do you agree with the proposed method of accessing the information?	YES	NO If no, please give a reason for your response and suggest an alternative method of accessing the information:

3	<p>Have we missed anything off the proposed Publications Framework? Please use the box opposite to comment.</p>	
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NAME			
ADDRESS			
ARE YOU	RESPONDING AS AN HHP TENANT?	Y	N
	RESPONDING ON BEHALF OF AN RTO	Y	N
	IF YES, PLEASE GIVE DETAILS:		
DATE			

Return by **10 April 2017** to: Angela Smith
 Hebridean Housing Partnership
 Creed Court, Gleann Seileach Business Park
 Willowglen
 Stornoway
 Isle of Lewis
 HS1 2QP