

TRANSPARENCY POLICY

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Reviewed By	S Woods	Approval By	Board
Consultation	Exec Team	Responsible Officer	Head of Corporate Services
Distribution	Website/Extranet/Teams/Schemes	Version No.	01

Policy Statement

Black Country Housing Group wants to be open and honest with its customers, colleagues and everyone it works with and provides services to.

We want to:

- Display good business practice by explaining what we do and why we do it and by taking responsibility for our actions;
- Create business relationships based on our values of Integrity, Positivity, Respect and Quality; so people want to work with us or be our customer;
- Be transparent by sharing as much information as we can.

Related Policies and Procedures

Data Protection & Retention Policy
Code of Conduct

Why be Transparent?

We believe being open and transparent is important. It helps deliver fair, efficient, and effective customer service and also sharing information about what we do and why we do it helps colleagues to deliver excellent services.

What do we Share?

Black Country Housing Group shares two types of information:

1. Information we have to share – to comply with law or regulation; and
2. Information we choose to share – to help customers and colleagues understand what we do and why we do it.

Overall, we aim to share more information than we legally have to.

Things we must share under law or regulation include:

- How much our board members and Chief Executive get paid. This is published in our Annual Report and Accounts to comply with accounting guidance and best practice.

- Details of our performance standards and commitment to achieving value for money. The Homes & Communities Agency (HCA) asks us to publish this information to help our customers and stakeholders see how we're managing homes and assets.
- The code of governance we use. BCHG has adopted the NHF Code of Governance (2015) which is a set of guidelines which help Boards structure themselves, and make decisions, effectively. We have to make statements about how we have complied with the Code in our Annual Report and Accounts.
- Details of payments over £500 made to suppliers. The HCA ask us to publish this information in connection with the grant funded building programme in return for providing us with grant funding. In addition, we choose to publish all our other payments over £500.

When deciding whether to share a piece of information by choice, we consider several things:

- who will find it useful;
- how we'll share it, so it can be accessed by everyone who needs or wants to see it;
- how much it will cost to share it – will it be a good use of money?;
- whether anyone could be upset or harmed by it;
- whether it contains confidential business information;
- what the Data Protection Act 1998 will let us legally share.

The Data Protection Act 1998

BCHG must follow the Data Protection Act 1998, which sets out what information we can legally share and how we should do it. We also have a clear Data Protection Policy and document retention guidance to help colleagues understand their responsibilities.

In some circumstances we may need to limit the amount of information we can share because of our legal duty to keep personal information private and confidential.

The Freedom of Information Act 2000

The Freedom of Information Act 2000 (or FOIA) only applies to public bodies (such as local authorities) and does not apply to BCHG.

However, if we're sub-contracted to carry out work on behalf of an organisation that is subject to FOIA, that organisation may ask us to supply information about the work we're doing for them so that they can respond to a FOIA request.

Health and Social Care Act 2008; Regulation 20: Duty of candour

We must be open and transparent with people who use our care and support services and other 'relevant persons' (people acting lawfully on their behalf).

What we share	Where you can find it	
	Website	Extranet
Remuneration Information		
*Details of CEO Remuneration		
Colleague Salary Bands		
*Non-Executive Director Remuneration (by role)		
Expense Policy		
Recruitment Information		
How we recruit Colleagues		
How we recruit Board Members		
Financial Information and Value for Money		
Procurement Policy		
*Value for Money Self Assessment		
Rent and Service Charge Setting Policy		
Annual Report and accounts (inclusive of NHF Code of Governance disclosures)		
Our Services and Performance		
Lettings Policy		
Restricting Access to Housing Policy		
Customer Annual Review		
Gas Safety & Servicing Policy		
Electrical Safety Policy		
Asbestos Policy		
Asset Management Strategy		
Complaints Policy		
*HCA Governance & Viability Rating		
CQC Rating		
Governance		
Governance Framework		
*Members of the Board and Board Committees		
Whistleblowing Policy		
Code of Conduct		
Equality and Diversity Policy		
Strategy		
Strategic Plan 2014-2017		

* Included in the Annual Report & Accounts