

# Communications Policy

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# KINGDOM HOUSING ASSOCIATION LIMITED

## COMMUNICATIONS POLICY

### 1. Statement of Intent

- 1.1 Kingdom aims to conduct its affairs in an open and transparent manner and make information publicly available unless there are justifiable reasons for withholding it.
- 1.2 The purpose of this policy is to set out Kingdom's approach to openness but also to recognise the importance of respecting confidentiality.
- 1.3 It is important for Kingdom to demonstrate openness and accountability and a real commitment to providing opportunities for stakeholders to be involved in or influence decision making, and to uphold the principles and practice of equality and best value.
- 1.4 Kingdom believes it is important to promote the aims, values and activities of the organisation to a wider public and be accountable to our stakeholders.
- 1.5 Kingdom is committed to the principles of sustainability and will endeavour to develop fair and consistent policies, procedures and practices.

### 2. General Principles

- 2.1 All employees and Committee Members are required to comply with this policy.
- 2.2 Kingdom will comply with all relevant legislation in applying this policy.
- 2.3 For the purposes of this policy, stakeholders are people or organisations with a direct involvement and interest in the operation and performance of Kingdom. The main stakeholders include:

- Members;
- Individuals who receive a service from Kingdom;
- Local communities;
- Local authorities;
- Other partner organisations;
- Employees;
- Funders;
- Regulators.

This is not an exhaustive list.

## Openness

- 2.4 Openness underpins Kingdom's commitment to be socially inclusive in delivering services and how Kingdom communicates. Kingdom accepts its general obligation to account for its actions and performance in an open manner to all stakeholders.
- 2.5 Information about the work of Kingdom, the governing body and employees will be available on request. Kingdom will only withhold information if there is an issue that requires confidentiality, perhaps because it is sensitive in a personal, financial or commercial way, where the disclosure of information is covered by legislation or where providing this information is not practical.
- 2.6 The decision on whether information is sensitive in a personal, financial or commercial way will be made by the Senior Management Team or Chairman of Kingdom.
- 2.7 Interested parties will be allowed to attend a meeting of the Committee of Management as an observer to non confidential parts of the meeting. Advance notice of 14 working days will be required to enable the agenda to be prepared where any sensitive issues can be discussed at the end of the meeting and to ensure the venue and catering arrangements are appropriate for the numbers attending.
- 2.8 Committee papers will be accessible to Departmental Managers, with the exception of information which is sensitive in a personal, financial or commercial way, or where the disclosure is covered by legislation. Departmental Managers will provide an update to their staff at team meetings on items they feel are appropriate.

## Accountability

- 2.9 Accountability is generally, being answerable for the exercise of power within a relationship. Specifically it is the requirement to account for one's actions or decisions relating to the Registered Social Landlord's business.
- 2.10 Kingdom will use different mechanisms for accountability depending on the stakeholders concerned. For example, Kingdom may use a tenants newsletter to provide information to tenants, but may use a local forum or liaison group to provide information to a local authority.

## Confidentiality

- 2.11 Employees and Committee Members will be made aware of the need to treat information gained through their relationship with Kingdom as confidential and should not disclose any information which may be of a sensitive nature with any unauthorised person. Employees and Committee Members will be advised of the need for confidentiality as part of the induction process.

2.12 It is not possible to produce a definitive list of all items considered to be confidential. The following, however, are considered confidential and should, at no time, be divulged inappropriately:

- Personal details of customers will be respected. This means that the names, addresses, details on family composition or economic status (or any other means of identification) of individuals will not be given in Committee reports or minutes or in any way divulged to anyone other than staff members, or other professionals, on a “need to know” basis and in accordance with Kingdom’s Data Protection Policy and registration with the Information Commissioner.
- All data records (both paper and computer) will be kept confidential to the appropriate staff members. No Committee member will view an individual’s personal details.
- Items considered, on an ad hoc basis, to be confidential.

2.13 Exception to the above are:

- Where a customer or member of the public complains or appeals to Kingdom about an issue and a personal representation is being made in accordance with its Comments and Complaints Policy. Where possible, the identify of the individual will be withheld.
- Where Kingdom has a legal obligation to provide information to a third party or the disclosure is in accordance with its Data Protection Policy and registration with the Information Commissioner.

### Communication

2.14 Kingdom will use all practical means to publicise activities, including newsletters, handbooks, leaflets, the Annual Report and website.

2.15 Kingdom will post summaries of non-confidential business including Committee of Management business on their website; and will continue to use a regular Newsletter as a further means of circulating such information.

2.16 Kingdom further recognises that the Annual General Meeting represents a regular opportunity to convey information on Kingdom’s business to members; and will continue to maximise this opportunity.

2.17 Kingdom has a Communications Plan which is reviewed annually and outlines how and when Kingdom will communicate with interested parties. The plan includes a strategy for printed material, events, press releases/features/photo opportunities, formal feedback, website, sponsorship and other matters of communication.

2.18 Kingdom recognises the need to ensure information takes into account of barriers caused by sensory impairment, language difficulties, and literacy problems and will provide assistance, where possible. Steps will also be taken to publicise services provided by Kingdom.

- 2.19 Kingdom believes communication is a two way process and it is equally important for Kingdom to receive the views of customers and partners to be responsive and flexible in delivering services.
- 2.20 Kingdom will involve customers to participate and influence the decision making process within the organisation through the Customer Relations Policy.
- 2.21 Kingdom will provide customers with the Membership Policy as part of their information pack.
- 2.22 Kingdom will ensure that information is channelled through the organisation from Committee of Management through regular Senior Management Team, operational and section meetings. Furthermore, Kingdom will use the Joint Consultative Group to facilitate and encourage communications between staff and management.
- 2.23 Kingdom will encourage feedback from stakeholders as a means to improve service delivery. This will include:
- Regular surveys carried out to establish customer satisfaction with the housing and services provided.
  - Comments are invited and investigated on all repairs carried out.
  - All formal complaints are recorded and analysed regularly with reports to the Committee on an annual basis.
  - Feedback on the discussions and work of the Customer Relations Panel will be reported to the Senior Management Team and Committee on an annual basis.
- 2.24 Opportunities to utilise technology will be maximised to provide an efficient and timely communication channel. This includes the regular review of Kingdom's website to improve the services available as technology evolves.
- 2.25 Any breach of confidentiality, whether deliberate or inadvertent, will be dealt with in accordance with Kingdom's Disciplinary Policy for staff and Code of Conduct for Committee Members.

### **3. Role of the Resources Department**

- 3.1 The Resources Director is responsible for overseeing this policy and its associated procedure.

### **4. Role of Departmental Directors and the Committee of Management**

- 4.1 Each Departmental Director (or designated officer) will be responsible for ensuring this Policy is applied in their department.

### **5. Role of the Resources Department**

- 5.1 The Resources Director is responsible for maintaining the Communications Plan.

5.2 The Resources Department will be responsible for responding to requests from stakeholders on accessing information.

**6. Monitoring and Review**

6.1 This policy will be reviewed 5 years from the date of implementation, which will be the date the policy is approved by the Committee of Management or earlier if deemed appropriate.

# KINGDOM HOUSING ASSOCIATION LIMITED

## COMMUNICATIONS POLICY

Policy drawn up with reference to:

Raising Standards in Housing – Governance and Accountability  
Open and Accessible? Thematic Study November 2007  
Regulatory Code of Governance  
Good Governance Standards for Public Services (the “Langlands Principles”)  
Information and Consultation of Employees Regulations 2004

Reference made to the following sources and other guidance:

Margaret Blackwood Housing Association’s Policy on Openness and Confidentiality  
River Clyde Homes Policy on Openness and Confidentiality  
Perthshire Housing Association’s Governance Policy

Cross Reference to Performance Standards for social landlords and homelessness functions:  
Guiding Standards GS2.1, GS3.1, GS3.2, GS3.3, GS3.4, GS3.5.

Prepared by Carol Pake, Resources Manager

Last Policy approved by Committee on 21<sup>st</sup> April 2003. Policy due for review as part of the policy review cycle.

Draft 1 Resources Director Review on 7<sup>th</sup> January 2009

Draft 2 Staff and Facilities Management Review on 27<sup>th</sup> January 2009

Sub Committee Review of Policy on 3<sup>rd</sup> March 2009

Presented for discussion and to Committee of Management on 16<sup>th</sup> March 2009

Policy Approved Yes

Next review date: No later than March 2014