

OPENNESS & CONFIDENTIALITY POLICY AND PROCEDURES

1. INTRODUCTION

This policy sets out how Prospect Community Housing will conduct its business in an open and accountable manner whilst, at the same time, ensuring that personal and commercial confidentiality is maintained where appropriate. The success of this policy is likely to rest upon getting the balance right and it is therefore important that all staff and Committee fully understand and embrace the principles outlined in this policy.

2. AIMS AND OBJECTIVES

Prospect Community Housing believes that its members, tenants, sharing owners and any other interested parties should have access to information on how it conducts itself. This means that unless information requested is considered commercially sensitive or personally confidential it will be made available on request. This will include information on:

- Performance against operational targets.
- How to become a member or the Committee or influence decisions in other ways.
- Inspection Reports from Communities Scotland.
- Policies and procedures.
- Non-confidential committee papers and minutes.
- Results of the annual external audit.

The above list is not exhaustive and Prospect will action any request for information within a reasonable timescale, unless prevented from doing so by the Confidentiality section of this policy. Any requests outwith the list should be authorised by the Director (or most senior staff member in her absence).

3. ACHIEVING THE POLICY OBJECTIVES

This section outlines the steps Prospect will take to ensure compliance with this policy.

3.1. Performance Against Operational Targets

This will be done mainly in the Annual Report and quarterly newsletters. Monthly figures will be available on request. The degree to which residents feel that they are kept appropriately informed is explored in our Tenant Satisfaction Surveys, and Prospect would increase the amount of information being circulated if any of the surveys suggested this.

3.2. How to Become a Committee Member or Influence Decisions in Other Ways

Prospect is continually trying to boost Committee membership to the maximum of 15. This is addressed by the membership policy. Sometimes residents may wish to influence certain decisions without necessarily joining the Committee. This is acknowledged and actively encouraged in Prospect's Tenant Participation policy.

3.3. Communities Scotland Inspection Reports

3.4. The findings from Communities Scotland Inspection Reports will be reported at the Annual General Meeting, on Prospect's website and on Communities Scotland website. The full report will be available on request.

3.5. Policies and Procedures

Prospect will make available information on all key policies and procedures in the office reception and on the website. Availability of this information will be publicised from time to time in the quarterly newsletter.

3.6. Non-Confidential Committee Papers and Minutes

Committee minutes (minus any confidential sections) will be available to any member on request. Where such a request is made, Prospect will provide the document(s) within seven working days.

3.7. Results of the Annual External Audit

Prospect's Management Letter will be available to any member on request. The external auditor will present the audited accounts at the AGM and respond to any questions raised.

4. CONFIDENTIALITY

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

- Personal confidentiality of residents and other members of the public will be respected. This means that the names, addresses, details of 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.
- All data records (both paper and computer) will be kept confidential to the appropriate staff members. No committee member will view an individual's data records.

- Items adjudged, on an ad hoc basis, to be confidential.

Exceptions to the above are:

- Where a resident or other member of the public complains or appeals to Prospect about an issue and a personal representation is being made to the committee as the final stage in the procedure. In these circumstances, it is impossible to withhold information on the person's identity.
- Where Prospect has a legal obligation to provide information to a third party.

5. BREACHES OF CONFIDENTIALITY

Any breach of confidentiality, whether deliberate or inadvertent, will be dealt with seriously by Prospect. The circumstances surrounding the breach will, of course, be taken into account. All breaches will be dealt with via the staff and Committee disciplinary policy and may result in:

- (i) the staff member(s) being issued with a warning or dismissed:
or
- (ii) the Committee member(s) being requested to leave the Committee.

6. MONITORING AND REVIEW

- 6.1.** The Director will ensure that the appropriate form of the procedure is followed in each case.
- 6.2.** This policy will be reviewed at least every 3 years by the Management Committee at their February meeting, with any amendments required being submitted to the Management Committee for approval.

Policy reviewed by Management Committee on 27 February 2008

SignedDate
(Chairperson)