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ADOPTED: 25.1.17

REVIEWED: 26.2.20; 30.8.23

COMMUNICATIONS POLICY

1.0 INTRODUCTION

1.1 Communication is a key function for Prospect Community Housing in terms of providing high quality customer service to the wide range of our stakeholders. How we communicate also has a big impact on the perception of the organisation. This policy and the associated procedures support staff to ensure our communications are appropriate, clear, and consistent.

1.2 It should be read in conjunction with the following:

- Committee Members Code of Governance, section 6.2
- Committee Members Code of Conduct, section 4.13
- Staff Code of Conduct, sections B4 - B10
- IT System Security and Use policy.
- Data Protection procedure

2.0 THE SCOTTISH SOCIAL HOUSING CHARTER

2.1 The relevant outcome of the Scottish Social Housing Charter for the Communication Policy is:

Outcome 2: Communication

Social landlords manage their business so that:

- Tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.

3.0 EXTERNAL COMMUNICATIONS

3.1 Our stakeholders are people or organisations with a direct involvement or interest in our operation and performance, including staff, tenants, residents, committee members, contractors, consultants, local partners and elected representatives.

3.2 It is important that we communicate effectively with stakeholders. This may be:

- Verbally by face-to-face meetings (in person or via video call), telephone, in groups or estate walkabouts
- In writing by letter, poster, or newsletter
- Electronically through email, text, whats app, electronic newsletter, My Prospect Account, or our website
- By social media such as Facebook, Instagram and X (Twitter)

3.3 We use our housing management system to offer a range of communication preferences to our tenants and residents to ensure communications are received in a format which suits. We also tailor our methods of communication to accommodate any particular needs.

- 3.4 We raise awareness of our activities and news via our social media and our website as well as articles in the local and national media.
- 3.5 Any formal enquiries from national or regional media will initially be handled by our Director, or in their absence, or a member of Management Team.

4.0 SOCIAL MEDIA APPROACH

- 4.1 Prospect recognises and embraces the benefits and opportunities that social media can bring as a tool. There are however particular issues involved in using social media created by the fact that it is instant, public, and far reaching. This policy aims both to safeguard the reputation of Prospect and to ensure staff operating Prospect social media accounts are properly protected.

Through this policy we aim to achieve a consistent corporate identity. Our corporate identity is the face we present to the world and demonstrates how we see ourselves and how we would like to be seen. This should be reflected in everything we do, including the way we post messages and communicate with our tenants and others on social media.

- 4.2 This policy applies to our current and potential social media accounts. Currently we use the following social media platforms:

- X (Twitter)
- Facebook
- YouTube
- LinkedIn
- Instagram

The purpose of Prospect's social media is to share information about Prospect's services and activities with our customers, partners, and the wider community we are part of. It also connects us to a variety of networks, giving us easy access to a wide variety of information. It can also be used to provide live updates in an emergency.

Social Media accounts are administered by the IT Officer. Managers will ensure that all users sign the policy disclaimer before providing access to usernames and accounts. The IT Officer will update the IT Database accordingly.

Employees acting as users to operate the accounts will not share usernames and passwords with anyone else outside or within the organisation. When using social media to communicate with tenants, Prospect staff should always use the Prospect social media account and not their own social media profile.

The nature of social media means that sometimes Prospect will need to respond to comments or questions outside normal working hours. In most cases, contact should be kept to a minimum and responses should focus on directing the query for resolution to the next working day. There may be occasions when a more immediate response or action is required depending on the nature of the comment.

- 4.3 Sometimes social media can be used as a source of expressing dissatisfaction, complaints, or abuse. These will be managed in the following way:

Complaints or any negative feedback should be acknowledged openly online and then dealt with privately under our Complaints Handling Procedure.

If a post is deemed offensive or abusive, we have the following steps available depending on the severity and persistence of the abuse:

- Hide or mute the comment from the general public view;

- Remind the user that we do not tolerate abusive or offensive language on our social media platforms;
- Delete/block the user and report them to social media company.

Users should seek guidance from their Manager if they are in any doubt about whether a post is offensive. The context of language use may be relevant. Some of our tenants and the wider community will use particular language because that is their normal speech rather than to be offensive. Users are encouraged to implement their judgement and local knowledge when determining what is deemed offensive.

There may be instances when an offensive comment occurs outside of normal working hours. On these occasions, users should err on the side of caution and hide/mute the comment rather than waiting until the next working day.

We reserve the right to remove any content from our social media pages, i.e., spam.

Prospect is not responsible for any unanswered posts or inaccurate information posted by others. In most cases, efforts will be focused on reducing the impact on Prospect's reputation by progressing communication offline.

It is important to occasionally review what information is public, as the default settings are sometimes changed.

4.0 INTERNAL COMMUNICATIONS

- 4.1 We recognise that efficient internal communication is key in ensuring great teamwork, high staff motivation and satisfaction. Success in these areas assists in the delivery of excellent customer service.
- 4.2 Prospect has a range of communication approaches internally including regular work review meetings, weekly staff briefings, regular staff meetings, committee meetings and away days, annual appraisals, surveys, consultations, staff meals, open door policy, staff room etc.

5.0 CUSTOMER CHARTER

- 5.1 As a housing association based within a community, we recognise the importance of a personal relationship with our tenants and residents, rather than a more corporate approach. Thus, many of our communications must achieve a balance of being friendly, clear and in plain English yet also being professional and on occasion, communicating an unwelcome message.
- 5.2 We have developed a Customer Charter with staff and our tenants. This helps us to provide a consistent high-quality service which helps to clarify expectations of staff and customers. The Charter can be found at Appendix 1.

6.0 MONITORING

- 6.1 In order to ensure that the objectives of this policy are met, we will:
 - Encourage and support each other to adhere to Prospect's Customer Charter.
 - Use feedback from customers such as complaints, compliments, and regular surveys to make improvements where appropriate.
 - All staff authorised to use Prospect social media platforms will be required to sign a declaration confirming they have read and understood the Social Media Policy and Guidelines.
 - Prospect will maintain a list of authorised staff and which social media accounts they have access to.
 - Prospect will update social media account passwords when a user leaves the association. This will be managed by the IT Officer. Passwords will also be updated regularly in line with good practice.

7.0 IMPLEMENTATION AND POLICY REVIEW

- 7.1 Each Manager is responsible for ensuring this policy is applied in their department. However, each staff and committee member have a responsibility take personal responsibility for providing good service by communicating effectively.
- 7.2 The Housing Manager will ensure that the Management Committee reviews this policy at least every 3 years.

Approved by the Management Committee on 30 August 2023

Next review due by August 2026

Appendix 1

PROSPECT'S CUSTOMER CHARTER - OUR COMMITMENT TO YOU!

WE HAVE OUR CUSTOMERS AND COMMUNITY AT HEART

- We work with our customers to find better ways of doing things
- We work with other local organisations to improve the community

WE ASK, LISTEN, RESPOND AND LEARN

- We regularly consult with our customers and ask for feedback
- We listen to our customers' viewpoint, opinions, and feedback
- We let our customers know of the changes we make as a result of their feedback
- When we get things wrong, we learn from the experience

WE DO WHAT WE SAY WE WILL

- We provide clear timescales for work to be carried out
- We update our customers with appointment times
- If there are any changes, we keep our customers informed
- We use a variety of methods of communication to keep our customers informed in a way that they prefer

WE ARE OPEN, HONEST AND APPROACHABLE

- Our staff are friendly, approachable, knowledgeable, and professional
- We hope our customers feel they can contact us for help
- We treat our customers as individuals

WE SUPPORT AND ARE SUPPORTIVE OF OUR CUSTOMERS

- By being approachable, listening to our customers and being actively involved in the local area we can support our customers when they most need help, either by providing that help ourselves or by helping our customers approach other specialist agencies.
- By having strong links in the community, we are able to support groups of tenants be more actively involved in the community

APPENDIX 2: PROSPECT SOCIAL MEDIA GUIDELINES

These guidelines are designed to give some practical support to staff who have been asked to operate Prospect's social media accounts.

- You are responsible for what you put on social media on behalf of Prospect. You should ensure that your content is consistent with your role in the organisation.
- Users should always check that they are using Prospect's social media account and not their own social media profile when responding to a comment, or when "speaking" on behalf of Prospect. This is particularly relevant when using a mobile device such as a smart phone where you may have to switch from your own account to Prospect's.
- Photos and images give a social media post more impact. Check you have permission to use the photo if it is specifically of an individual or a small group. This includes children. Some phones will turn an image upside down or on its side if the phone camera is the wrong way up so be aware of the correct way to use your phone to avoid this. Landscape photos often fit better with Facebook/ X(Twitter) and are better for the website format.
- People commenting on our social media platforms sometimes forget that they are on a public medium. If personal details are shared, or a personal conversation develops via a thread, take the comments down by hiding them and if appropriate let the person know why you did this.
- The speed of social media can be unnerving. Respond appropriately when required but don't be rushed into quick answers before you are sure of what you want to say.
- Responding to a negative comment can be effective. Others may have been waiting for this response and feel supported by you publicly tackling the comment. With some persistent negative complainers, it can be more appropriate to not respond as you will be pulled into a protracted debate which will not be productive.
- If you spot an offensive comment or an abusive thread outside of normal working hours, it is better to hide the comments immediately. If that comment has been made at 9PM on a Friday evening, it will be viewed many times before the office re-opens on Monday morning. The offender will not know that they have been hidden, and a decision about their access to Prospect's social media can then be made within working hours.
- Check spelling and grammar before posting. Social media is more informal, but you are representing Prospect. Once the post has been published you can correct it if there's a mistake for future viewers, but it will already have gone public to Prospect's current followers and anyone else who has access to your page/ account.

Signed:

Date:

Print Name:

PROSPECT EQUALITY IMPACT ASSESSMENT RECORD



Title of policy/ practice/ strategy	Communication Policy	
Department	Housing Management	
Who is involved in the EQIA?	Catherine Louch	
Type of policy/ practice/ strategy	New <input type="checkbox"/>	Existing <input checked="" type="checkbox"/>
Date completed	22 August 2023	

Stage 1: Screening Record

What is the main purpose of the policy?

Prospect's Communication Policy outlines our approach to communications with internal and external stakeholders. It links to the Scottish Social Housing Charter Outcome 2: Communications.

Who will the policy benefit and how?

This policy impacts and should benefit tenants, service users, employees, committee, stakeholders, the wider community and touches on our relationship with the media. The policy and Customer Charter will assist to ensure clarity and a consistent approach. This should have a positive impact on service delivery for our tenants giving clarity of the service they can expect from Prospect. The policy also clarifies our approach to communications with external of stakeholders.

For each equality group, does or could the policy have a negative impact?

Protected characteristic	Negative	Positive/no impact	Don't know
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pregnancy & maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief (including no belief)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Are there any potential barriers to implementing the policy?

None identified.

	Yes	No
Is a full EQIA required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered no to the above question explain why a full EQIA is not required:

No impact on equalities identified:	<input type="checkbox"/>
Other:	

Stage 2: Data and evidence gathering, involvement and consultation

Include here the results of your evidence gathering, including qualitative and quantitative data and the source of that information, whether national statistics, surveys, or consultations with relevant equality groups.

Source	Qualitative evidence provided	Quantitative evidence provided	Which protected characteristics are covered?	Gaps identified/ action taken
Management information data		Annual staff and committee equalities data	Age, disability, gender, ethnicity. In some cases other protected characteristics	Membership data not collected.
Tenant satisfaction survey		Survey carried out in 2022	Age, disability, gender, ethnicity. In some cases other protected characteristics	
Committee, Equalities Working Group and Tenants Forum minutes	Equality related issues identified and discussed		Various	
Review of complaints received	Tenant/service user experience	Statistical data on types of complaint	All protected characteristics	Quarterly review of complaints as part of Key Performance Indicator report assists with data collection and analysis of protected characteristics
Observations/conversations (anecdotal)	Staff/committee/tenant/service user levels of understanding, inclusive practice		All protected characteristics	
Edinburgh Census 2011		Statistical data	Age disability, gender, ethnicity, marital status, religion or belief.	Data becoming out of date.
EdIndex data		Statistical data provided for individuals on the housing waiting list	Age, disability, gender, ethnicity. In some cases other protected characteristics.	Data becoming out of date.
What Scotland Thinks data		Statistical data on attitudes	All protected characteristics	

Community Profile

The following profile summarises key data for Prospect stock, the Wester Hailes Community and Edinburgh.

Indicator	Prospect	Wester Hailes	Edinburgh	Source	Comment
The number of households in receipt of Universal Credit.	42%	4,605-40%	34,317-9%	Prospect – Cx 22.11.21 Wester Hailes – as at 14.10.21 Universal Credit: Official Statistics (arcgis.com)	Prospect received housing costs directly for 42% of tenants.
The proportion of households in owner occupation, private rented accommodation, and social housing	100%	OO-25.7% PR-9% SH-64.5%	OO-58.9 PR-22.4% SH- 17%	WH-2011 Census Edinburgh- 2011 Census	
The number of people from minority ethnic communities;	23%	20.3%	11%	Prospect – Tenant Survey 2022 WH- 2011 Census CEC- 2011 Census	
The number of people over 60;	18.6% over 65	10.5% Over 65	15% Over 65	Prospect – Tenant Survey 2022 WH- 2011 Census CEC- 2011 Census	
The number of lone parent families;	23%	14%	5.8%	Prospect – Tenant Survey 2022 WH-2011 Census CEC-2011 Census	
The number of people with long-term limiting illnesses;	38.5%	30%	26.7%	Prospect – Tenant Survey 2022 WH-2011 Census CEC- 2011 Census	
The number of homeless persons;	n/a	Not available	1,912	2020/21 Homelessness Statistics 2020-21 - gov.scot (www.gov.scot)	
The number of single households;	38.6%	37.6%	39.1%	Prospect – Tenant Survey 2022 WH-2011 Census CEC-2011 Census	

Stage 3: Assessing the impacts

How might the policy impact on people who share protected characteristics? Include both positive and negative impacts.

Protected Characteristic	Description of Impact
Age	<p>Offering information in a range of formats to suit individuals reflects that different people like to receive communications in different formats. Our 2022 Tenant survey found that our tenants aged under 65 were more likely to prefer digital source, where as the over 65s preferred that we communicate with them in writing or via the newsletter. Younger tenants were to use My Prospect account.</p> <p>We aim to include photographs in our social media and publications which reflect the community we serve, including older and younger people.</p>
Disability	<p>Striving to communicate in different formats such as large print, via websites or our tenant portal will have a positive impact on our customers with poor sight or mobility. Our 2022 survey shows that 39% of respondents said either they or someone in their household had some form of health problem or disability. Those with a disability were significantly less likely to have access to the internet (59% vs 37%).</p> <p>We aim to include photographs in our social media and publications which reflect the community we serve, including disabled people.</p>
Gender reassignment	No impact identified.
Marriage & civil partnership	No impact identified.
Pregnancy & maternity	No impact identified.
Race	<p>Using plain English and keeping communications clear and to the point will have a positive impact on our customers where English isn't their first language. We will also continue to offer translated communications on request.</p> <p>The My Prospect Account has a translation functionality.</p> <p>Our 2022 survey shows that 78% of our tenants are white Scottish while 11% are Polish, 3% are black African. Our Polish tenants are more interested in using My Prospect Account (40% vs 8%)</p>

	We aim to include photographs in our social media and publications which reflect the community we serve, including BME people.
Religion or belief (including no belief)	No impact identified.
Sex	No impact identified.
Sexual orientation	We aim to include photographs in our social media and publications which reflect the community we serve, including same sex couples.

How does the policy promote equality of opportunity?

This Communication Policy aims to outline the way in which our communications are presented to internal and external stakeholders. However, it recognises that our customers have a wide range of preferences or requirements and, where possible, we will aim to honour these in the communication approaches we use.

How does the policy promote good relations?

By offering a range of communication methods in a consistent and clear style and format, we aim to improve service delivery to all.

Stage 4: Decision making and monitoring

Identifying and establishing any required mitigating action

If, following the impact analysis, you think you have identified any unlawful discrimination – direct or indirect - you must consider and set out what action will be undertaken to mitigate the negative impact.

Does the assessment show a potential for differential impact on any group(s)?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is there potential for unlawful direct or indirect discrimination?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

What arrangements could be implemented to reduce or mitigate any potential adverse or negative impacts identified?

Describing how Equality Impact analysis has shaped the policy making process

As part of the implementation of this policy, we offer a range of standard communications in different formats. To ensure that we meet the outcomes of this assessment, our tenants and residents will be able to specify their communications preferences. There may be resource impacts here dependent on the demand for large print documents or translation.

Monitoring and Review

The policy and this assessment will be reviewed in 3 years' time.

Stage 5 - Authorisation of EQIA

Please confirm that:

- ◆ This Equality Impact Assessment has informed the development of this policy:

Yes No

- ◆ Opportunities to promote equality in respect of age, disability, sex, pregnancy and maternity, gender reassignment, sexual orientation, race and religion or belief have been considered, i.e.:

- Eliminating unlawful discrimination, harassment, victimisation;
- Removing or minimising any barriers and/or disadvantages;
- Taking steps which assist with promoting equality and meeting people's different needs;
- Encouraging participation (e.g., in public life)
- Fostering good relations, tackling prejudice, and promoting understanding.

Yes No

Declaration

I am satisfied with the equality impact assessment that has been undertaken for Prospect Community Housing's Communication Policy.

Name: Catherine Louch

Position: Housing Manager

Authorisation date: 22 August 2023