

# Freedom of Information

<b>Policy Ref No</b>	<b>COR28</b>
Implemented by	CEO
Approval Body	Management Committee
Approval Date	January 2026
Review Date	January 2029

# Contents

1. INTRODUCTION AND AIMS	1
2. LINK TO OTHER POLICIES AND PROCEDURES	1
3. POLICY STATEMENT	1
4. <u>KEY RESPONSIBILITIES</u>	1
5. PERFORMANCE MONITORING	2
6. PROSPECT EQUALITY IMPACT ASSESSMENT RECORD	3

## 1. INTRODUCTION AND AIMS

All Housing Associations in Scotland, from 11 November 2019, are subject to the Freedom of Information (Scotland) Act 2002 (FOISA).

All Housing Associations must also comply with the Environmental Information (Scotland) Regulations 2004 (EIR).

This policy sets out the main areas of compliance that are expected under these two areas of legislation, and at a strategic level how we will comply.

A separate procedure sets out the practical procedural aspects of our compliance in these areas.

## 2. LINK TO OTHER POLICIES AND PROCEDURES

This policy should be read in conjunction with:

- COR 44 FOI and EIR's procedure
- COR 42 Data protection procedure
- COR 13 Data protection policy
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## 3. POLICY STATEMENT

Prospect is committed to being open and transparent in the conduct of its operations and in complying fully with the legislation and Scottish Ministers Codes of Practice. Prospect will:

- Ensure that records are created systematically, that they can be retrieved efficiently and can be provided to any person making a request for information.
- Make all employees aware of their obligations and provide guidance through our related procedure.
- Monitor compliance with the legal requirements.
- Routinely publish a wide range of information through the publication scheme.
- Send quarterly statistics to the Scottish Information Commissioner.

## 4. KEY RESPONSIBILITIES

We have three key responsibilities under the FOISA and EIR. These are set out below, with an explanation of how we comply.

1. Respond to information requests and requests for review within statutory timescales.

There is a statutory 20 working day period for responding to FOI requests. The same applies to EIR, but in this case there is a possible extension of a further 20 working days for complex requests. Our procedure will sets out how we comply with these timescales, including the process for processing requests.

2. Adopt an approved publication scheme and proactively publish/disseminate information.

We have adopted the model publications scheme provided by the Scottish Federation of Housing Associations and the Scottish Information Commissioner. We have implemented this scheme, and make sure that all the links in our Guide to Information are kept up to date.

3. Provide advice and assistance.

Our IT Officer is the co-ordinating officer for FOI and EIR. Staff are adequately trained and this ensures that all staff can provide basic advice, and other staff are available for more detailed requests. We aim to be proactive and helpful when providing advice and assistance.

In order to ensure compliance with our responsibilities, we have allocated different roles to staff members. Our CEO will take a leadership role in overseeing our compliance, supported by our IT Officer who takes a co-ordinating role operationally. Each member of the Management Team prioritises work resulting from requests, and all staff members assist when appropriate. Staff training ensures that all staff have at least a basic knowledge of what is covered under the legislation.

## **5. PERFORMANCE MONITORING**

The CEO is responsible for ensuring that this policy is implemented as required by Committee Members and all staff.

The CEO will ensure that this policy is reviewed by the Management Committee at least every 3 years.

## 6. PROSPECT EQUALITY IMPACT ASSESSMENT RECORD

<b>Title of policy/ practice/ strategy</b>	Freedom of Information and Environmental Information Regulations
<b>Department</b>	Corporate
<b>Who is involved in the EQIA?</b>	Brendan Fowler
<b>Date completed</b>	January 2026

### Stage 1: Screening Record

***What is the main purpose of the policy?***

The policy sets out our compliance with the legislation on Freedom of Information and Environmental Information Regulations.

***Who will the policy benefit and how?***

This policy affects anyone who wants to know more about the work of Prospect. This includes, but is not limited to, our customers, journalists, academics and the general public.

***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 checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy & maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief (including no belief)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Yes	No
<b><i>Is a full EQIA required?</i></b>	<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"/>
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## Stage 2: 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	By making information available in different formats, this will make it accessible to people of all ages.
Disability	By making information available in different formats, this will make it accessible to people with a disability that would otherwise make it difficult to access and understand the information.
Gender reassignment	No impact identified.
Marriage & civil partnership	No impact identified.
Pregnancy & maternity	No impact identified.
Race	We provide a translation and interpreting service to make this information as accessible as possible.
Religion or belief (including no belief)	No impact identified.
Sex	No impact identified.
Sexual orientation	No impact identified.

### **How does the policy promote equality of opportunity?**

By making the information as accessible as possible, we are encouraging everyone to take the opportunity of accessing the information that we publish or can provide on request.

### **How does the policy promote good relations?**

We are being proactive in making sure that those from all the protected characteristics can access the information equally.

### Stage 3: 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?**

None identified.

#### **Describing how Equality Impact analysis has shaped the policy making process**

It has highlighted the importance of embracing the spirit of the FOI legislation through proactive publication and availability of information in different formats.

#### **Monitoring and Review**

Any breaches of this policy will be monitored, and any equalities issues related to this considered. The policy will be reviewed every three years by the CEO.

### Stage 4 - 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 **FOI policy**

**Name: Brendan Fowler**

**Position: CEO**

**Authorisation date: January 2026**