



Transparency Policy

Version 1.0

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Version Control

Note: minor updates increase version number by 0.1; major updates increase version number by 1.0.

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Table of Contents

1. Introduction	Error! Bookmark not defined.
2. Requirement for transparency.....	4
3. Financial Transparency.....	4
4. Governance Transparency.....	4
5. Performance Transparency.....	5
6. Accessibility.....	5
7. Legislation.....	5
8. Regulation.....	5
9. Information to be provided.....	6
10. Personal and sensitive information.....	6
11. Implementation.....	7
12. Review.....	7
13. Related Policies.....	8
14. Table - Examples of information to be made available (Appendix A).....	9

Transparency Policy

1. Introduction

- 1.1 Yarlington is an open and transparent organisation and we are accountable to our residents, shareholders, service users, local authority partners, lenders, regulators, employees (existing and future) and other interested parties. At the same time, we are committed to upholding the confidentiality of personal data and commercially sensitive information. This Policy sets out our approach to transparency of information and the way that we conduct business.

2. Requirement for transparency

- 2.1 In recent years transparency has been high on the Government's agenda, particularly in the public sector. The ONS took the decision to reclassify housing associations and deregulation measures have been introduced. There is an increasingly level of commerciality in the housing sector and therefore transparency is paramount to protect the integrity of the sector. There is certain information that is required by our regulator to be made available. This includes all expenditure over £500 on our development schemes funded by the HCA. This is made available on our website. Other pieces of information are public records and can be accessed via other methods – e.g. our accounts are filed at the Financial Conduct Authority and are freely available.

3. Financial Transparency

- 3.1 Yarlington is committed to transparency and will publish annually the annual report, financial statements, Value for Money Statement and remuneration of the Board and the Executive Team.

4. Governance Transparency

- 4.1 The Board and its Committees usually meet in private. They aim to be as open as possible about their work and the output from Board and Committees will be summarised and made available upon request. Board/Committee reports are available to staff unless they contain commercially sensitive information or personal details or issues relating to one or more individuals.
- 4.2 Co-regulation is enshrined in the governance culture at Yarlington. The Challenge and Change Group (resident scrutiny function) produce quarterly reports; these reports are presented to the Audit and Risk Committee and are published on the website.
- 4.3 The Board discharges its desire to be transparent through various methods such as the annual co-regulation meeting, six-monthly meetings between the Chair of the Board and the Chair of Challenge and Change.

5. Performance Transparency

- 5.1 Yarlington is open and transparent in matters relating to performance. Annual performance statistics will be published on the website so that stakeholders and shareholders may view the organisation's key performance indicators (KPIs) and the performance measured against the KPIs, i.e. customer satisfaction levels.

6. Accessibility

- 6.1 It is important that information is accessible and clear to find on the website; matters relating to transparency will be contained within the "Governance and Regulation" section on the website.

7. Legislation

- 7.1 We will comply with the provisions of the:

- Data Protection Act 1998 in relation to the privacy of data subjects; When the General Data Protection Regulations come into force in 2018 we will comply with the legislation
- Telecommunications (Lawful Business Practice) Regulations) (interception of business communications) Regulations 2000;
- Environmental Information Regulations 2004 in relation to the provision of environmental information relating to our development activities.
- UK Modern Slavery Act 2015 – we publish our compliance statement on our website annually
- Co-operative and Community Benefit Societies Act 2014

- 7.2 Although not subject to the Freedom of Information Act 2000, we will provide information on our activities in accordance with the spirit of the Act.

8. Regulation

- 8.1 As a Housing Association we are regulated by the Homes and Communities Agency (HCA). As such will be comply with the Regulatory Standards as published by the HCA; an annual self-assessment will be carried out and compliance against the Governance and Financial Viability Standard will be published in the annual accounts.

- 8.2 As a Community Benefit Society we are regulated by the Financial Conduct Authority (FCA). We will comply with the FCA's Regulations, such as the submission of annual returns, filing of annual accounts, etc.

- 8.3 Yarlington Housing Group is the Parent of the Group; the subsidiary companies, Yarlington Homes Limited, Inspired to Achieve Limited and Yarlington Property Management Limited are subject to the

provisions of the Companies Act 2006 and the subsidiaries will comply with the Act. The subsidiary accounts and confirmation statements are filed annually at Companies House.

9. Information to be provided

- 9.1 We are committed to making information about our services, activities and performance available to interested parties. We will use a variety of media, e.g. website, social media and publications as well as responding to individual requests.
- 9.2 We will not, however, disclose everything. Some information needs to remain confidential for legal, commercial or contractual reasons, or because it's premature disclosure would jeopardise action that Yarlington is planning to take.
- 9.3 We will not usually publish details of payments to individuals. However, where it is in the public interest to name an individual, e.g. information regarding sole traders and individuals in the public domain, the information will be disclosed, unless the individual has specifically objected to its publication. The names of creditors will not be published where payments are subject to a contractual requirement for commercial confidentiality.
- 9.4 Customers all have access to the Customer Portal so that they may retrieve information in relation to the rent account, repairs, etc.
- 9.5 Appendix A sets out the various information items and how and to whom they will be made available.
- 9.6 Information should be published as quickly as possible after it has been produced – e.g. performance data will be published upon the conclusion of the financial year end
- 9.7 Yarlington is an inclusive organisation and information should be produced in the most accessible format and language so as to allow ease of access to all relevant parties; should individuals require reasonable adjustments they should liaise with the Governance Co-ordinator

10. Personal and sensitive information

- 10.1 All personal and sensitive information will be kept and handled confidentially, whether the information has been received formally, informally or discovered by accident. Broadly this will include:
- Anything of a personal nature that is not a matter of public record about an individual;
 - Commercially sensitive organisational information which, if divulged, could be harmful to Yarlington or its projects and stakeholders.

10.2 We will protect the confidentiality of personal and sensitive information by:

- the storing and transfer of such data in a secure way, such as the use of encryption for electronic transfers;
- controlling access to Yarlinton premises;
- obtaining, processing and making personal information available in accordance with the requirements of the DPA and relevant guidelines;
- authorising access to IT systems according to need;
- training staff and Members in data protection principles and practices;
- ensuring that a written contract exists when using another organisation to process personal information.

10.3 For the purposes of the detection, prevention and reduction of crime and anti-social behaviour, we may share information with partners with whom we have an Information Sharing Agreement, in accordance with, and having due regard to all relevant legislation, regulations and good practice guidance.

10.4 Documents, whether on paper or in electronic format, will be retained and disposed of in accordance with the Document Retention and Disposals Policy.

11. Implementation

11.2 All members of staff, Board and Committee Members (including co-opted members), Involved Residents, contractors and agents working for Yarlinton are required to maintain and respect the confidential information to which they have access. The Company Secretary and the Head of Information are the senior managers responsible for the effective operation of this Policy.

12. Review

12.1 Yarlinton will keep under review the arrangements for transparency, taking into account good practice. This Policy will be subject to review every 3 years, or more frequently if there is a legislative or regulatory need to do so.

13. DOCUMENTS PROVIDING ADDITIONAL DETAILS IN SUPPORT OF THE INFORMATION MANAGEMENT POLICY

Code of Conduct (Individual and Company)

Customer Feedback Policy

Whistle-blowing Policy

Equality and Diversity Policy

Social Media Policy

Communications Policy

Data Retention and Data Disposal Policy

14. Examples of information to be made available

Type of information	Available	Where	How frequent	Responsible person
Statutory and regulatory information such as annual accounts, regulatory reports, Value for Money self-assessment, Anti-Slavery statement, compliance with Governance and Financial Viability Standards, etc.	Yes	Website	Annually	Company Secretary
Corporate strategy and related information	Yes	Website	As requested	Strategic PR Manager
Key strategies and action plans – e.g. asset management plan	Yes	Website	Ad Hoc	Strategic PR Manager
Key policies	Yes	Website	Ad Hoc	Governance Co-ordinator
Summary Board Minutes	Summary	Specific request only	Quarterly	Governance Co-ordinator
Attendance/observation at Board meetings	Specific request only	-	-	Governance Co-ordinator
Response to consultation papers	Yes	Website	Ad Hoc	Business Intelligence Manager
Performance reports – high level balanced scorecard	Yes	Website	Annually	Performance Manager
Financial performance – high level summary	Yes	Website	Annually	Finance Manager
Cost information e.g. maintenance cost per unit	Yes	Website	Annually	Head of Financial Reporting

Type of information	Available	Where	How frequent	Responsible person
Staff and Board remuneration information - bandings	Yes	Website in annual report	Annually	Executive Director of Finance and Corporate Services
Expenditure over £500	Yes	Website	Quarterly	Development Accountant
Local spend data – how much is spent within the local economy	Yes	Website in Corporate Social Responsibility Report	Annually	Strategic PR Manager
Job vacancies	Yes	Website	Always	Head of HR
Challenge & Change reports	Yes	Website	Quarterly	Governance Co-ordinator
Internal audit Plan	Yes	Website	Quarterly	Head of Business Assurance