



## GROUP OPENNESS AND CONFIDENTIALITY POLICY

POLICY IMPLEMENTATION CHECKLIST	
Policy Guardian:	Chief Executive
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Equality Impact Assessment required:	YES
Data Protection compliant:	YES
Health & Safety compliant:	YES
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## **1 INTRODUCTION**

- 1.1 The Caledonia Group currently comprises Caledonia and Cordale Housing Associations, and their subsidiaries. This Policy describes how the Group's companies will meet their commitments in relation to openness and confidentiality.
- 1.2 The Policy applies to Governing Body members, and to all staff, whether they work in offices or at housing developments.

### **Delegated Authority**

- 1.3 The Group's companies will ensure that staff and Governing Body Members' responsibilities in relation to the management of this Policy are clear. The Governing Body's role is to agree policy and evaluate performance, and to ensure that the policy is observed in relation to its own activities and conduct. Implementation of the Policy as it relates to staff will reflect the management structures of the Group's companies.

## **2 PRINCIPLES, AIMS AND OBJECTIVES**

### **Principles**

- 2.1 The Group's companies are committed to acting in an open and accountable way in relation to tenants and residents, partners and other stakeholders.
- 2.2 Openness and accountability are essential for the following purposes:
1. Providing opportunities for tenants and other stakeholders to be involved in or influence decision-making;
  2. Demonstrating that the Group's companies are acting in accordance with the expectations of and commitments made to tenants and other stakeholders;
  3. Upholding the principles and practice of equal opportunities and continuous improvement.
- 2.3 As a matter of general policy, information about the Group's companies and their work should be widely and freely available. The Group's companies will publish material about the organisation, its services and its performance, and communicate it through a variety of mediums (see Sections 5 and 6). The Group's companies will make additional information available upon request, unless there are good reasons of confidentiality or practicality, or where its disclosure is restricted by legislation (see Section 8). The commitment to openness does not detract from the need to keep certain types of information confidential, particularly where it is required by law (see Section 9). The policy is designed to strike a balance between a commitment to openness and the need for confidentiality in some circumstances. In general terms, all organisational information which is not sensitive should be openly available; and all personal information that is not a matter of public record should be kept confidential.
- 2.4 Governing Body members and staff of the Group's companies, under their respective Codes of Conduct, accept an obligation to account for their actions in an open manner. The Group's companies are accountable to a wide range of groups, including tenants, residents, local organisations, other RSLs, local authorities, lenders, regulators, local communities and other partners in the statutory and voluntary sectors. The Codes of Conduct for Governing Body Members and Staff, Rules and Standing Orders are posted

on the websites of the Group's companies. Different mechanisms will be used for different stakeholders, depending on their interests and the nature of any legal, contractual or informal agreement with these parties. The Group's companies will ensure that through these mechanisms these parties are kept informed about the activities of the relevant Group company, and have an opportunity to comment on, and where appropriate have an involvement in, the planning and decision making of the relevant Group company.

### **Aims of Policy**

2.5 The aims of this Policy and associated procedures are to describe:

How the Group's companies will meet their commitments to openness and accountability

How the Group's companies will make information available and provide access to information; and

How the Group's companies will deal with information which must remain confidential.

2.6 The Group's companies have a separate policy on data protection. This describes the arrangements for access to personal information and compliance with the law on data protection.

## **3 EQUAL OPPORTUNITIES STATEMENT**

3.1 This Openness and Confidentiality Policy acknowledges and aims to complement Equality and Diversity Policies of the Group's companies. The Group is committed to valuing and promoting diversity, fairness, social justice and equality of opportunity throughout every aspect of its business. This Openness and Confidentiality Policy is particularly relevant in ensuring fair and equal access to information about the activities of the Group's companies, services, decision making and performance. We aim to ensure no individual is discriminated against because of their race, ethnic or national origin, religion or belief, age, gender, sex, sexual orientation, marital status, family circumstances, employment status, disability or other personal characteristics.

3.2 The Group's companies also aim to ensure no groups or individuals are adversely affected, directly or indirectly, by the implementation of this policy. During future reviews of this policy we will use a process of Equality Impact Assessment to identify and rectify any inequalities likely to result or resulting from its implementation.

## **4 LEGAL AND REGULATORY FRAMEWORKS**

### **Legislation**

4.1 In formulating and implementing this Policy, statutory requirements have been incorporated, where required. The legislation particularly relevant to this Policy includes:

**Data Protection Act 1998:** provides rights to individuals in relation to personal data held about them; and regulates the use of personal data

**Freedom of Information Act (Scotland) Act 2002:** entitles members of the public to receive information that they request from a public authority, subject to certain exemptions such as the need for the protection of personal data, commercial sensitivity or national security. Although not bound by the Freedom of Information Act (which currently does not extend to RSLs), the Group's companies aim to meet the spirit of the legislation. This Act supersedes the Access to Personal Files Act 1987.

**Housing (Scotland) Act 2001:** provides a statutory right to all tenants with Scottish Secure Tenancies to receive information about their landlord's policies and procedures. The Act also obliges landlords to consult and provide tenants with information in developing their Tenant Participation Strategy.

**Housing (Scotland) Act 2010:** provides the legal framework for the modern social housing regulatory regime, and includes provisions compelling social landlords to act in accordance with the Equality Act (2010).

**Scottish Public Services Ombudsman Act 2002:** describes the statutory arrangements for conducting independent investigations of complaints relating to misadministration by a wide range of listed authorities, including Registered Social Landlords.

**Human Rights Act 1998:** gives individuals a right to respect for their privacy.

## **Regulatory Requirements**

- 4.2 In its Regulatory Framework Document (April 2012), the Scottish Housing Regulator introduces six Regulatory Standards of Governance and Financial Management and associated guidance.

Standard 2 is of particular relevance to this policy:

“The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these priorities.”

In addition, the Scottish Social Housing Charter sets out the overall outcomes that RSLs should aim to achieve in performing their housing activities.

Outcome 2 (Communication) is of particular relevance to this policy:

“Social landlords manage their businesses 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.”

## **5 PUBLICATION OF INFORMATION**

### **Statements of Intent, Annual Report and Accounts; and Report Cards**

- 5.1 The Group's companies will comply with the law and with best practice. They will make

available on an annual basis an Annual Report and its Annual Accounts through publication on their respective websites.

- 5.2 The Annual Report will contain standard information required by company law and more detailed information on changes to the relevant Group company's structure and governance, its activities and its performance carried out in the previous financial year. The Annual Report and Accounts will be available on the relevant Group company's website, will be circulated widely, and will be made freely available upon request to any interested party.
- 5.3 The Annual Accounts will take the form required by the law, and will be available at the Annual General Meeting, on the relevant Group company's website, and upon request to any interested party. The information made available will include the annual external auditor's statement. Additionally, a summary of the accounts will be included in the Annual Report, with a note to direct interested parties as to where they can obtain a full copy.
- 5.4 As a matter of good practice, the Group's companies will continue to publish and make widely available an annually updated Business Plan.

### **Information to Tenants**

- 5.5 Tenants of the Group's companies have a statutory right under the Scottish Secure Tenancy to receive information about their tenancy and about their landlord's policies and procedures.
- 5.6 The information, which will be provided to each tenant, will include:
- Complaints policy and procedures
  - Tenancy agreement
  - The right to repair
  - The right to compensation for improvements
  - Rents and other charges
  - Allocations Policy
  - Priorities and procedures for allocating houses, including transfers and exchanges
  - Repairs and Maintenance
  - Service Standards
  - Tenant Participation Policy, consultation arrangements, and details of tenants' organisations
  - Equality and Diversity Policy
- 5.7 This information will be made available at the point a tenancy is granted, preferably using a Tenants' Handbook. This will be periodically revised and updated. In between comprehensive revisions, tenants will be informed of significant changes as they happen.
- 5.8 The Group's companies acknowledge and will fully comply with the SHR requirement for all social landlords to report their performance in achieving or progressing towards the Scottish Social Housing Charter outcomes and standards to their tenants and other service users. As required we will consult tenants and service users on the content and format of this report.
- 5.9 We will similarly ensure information that SHR produces about the performance of the

Group's companies is freely provided to all tenants and services users, and accessible to any other stakeholder.

### **Other Published Information**

5.10 The Group's companies will make additional information available to the public, on websites and in published form, for transparency and accountability, including

*Information on structure, governance and decision-making processes of Group Companies*

5.11 The Group's companies will make the following information publicly available about their structure and governance:

- How the Governing Body is elected
- How decisions are made about housing and related services, and about management of the organisation

We will also make all our other governance related policies and other relevant documents freely available. This will include in particular our:

- Rules
- Standing Orders (including Terms of Reference)
- Membership Policy
- Governing Body Membership Policy
- Financial Regulations
- Conflict of Interest Policy
- Payments and Benefits Policy

*Reports of investigations carried out by the Scottish Public Services Ombudsman on the Group's companies*

5.12 RSLs are required to make copies of investigation reports available for inspection, unless the Ombudsman has directed that a report should not be made available, taking account of the public interest and the interest of the complainant and other persons.

5.13 Unless so directed, CHA will publish any reports in full, and will summarise them through a variety of channels. The Group's companies will also openly publicise their Complaints Policy and Complaints Handling Procedure.

*Results of customer surveys and CHA's response*

5.14 The Group's companies will carry out periodic surveys of tenants and service users to determine levels of satisfaction with services and performance. These results will be published, along with relevant Group company's responses, in order to demonstrate the relevant Group's company's commitment to act on the results of the information received.

*Scottish Housing Regulator's Regulatory Assessment of Performance of the Group's Companies*

5.15 The Scottish Housing Regulator publishes a range of information about individual social landlords on its website. The Group's companies will notify stakeholders of the outcome

of the SHR's annually published information on performance and proposed engagement with the relevant Group company, together with the outcome of any future regulatory interventions. The Group's companies will advise and assist any individuals or organisations who wish to obtain a copy of regulatory reports, of the means of accessing or obtaining this information.

#### *Investment Plans*

- 5.16 The Group's companies will make available plans to improve the housing stock and provide new housing. These plans will be updated as a minimum on an annual basis.

#### *Minutes of Governing Body meetings (other than confidential items)*

- 5.17 Summaries of Minutes will be published on the Group company websites and will be available for inspection at offices. The Group's companies will also advise members and service users, through regular newsletter articles and information in the reception area, of their entitlement to inspect or obtain copies of Governing Body reports and summaries of minutes - unless there are matters of commercial and personal confidentiality which cannot reasonably be placed in the public domain.
- 5.18 Where Governing Body business is of a confidential nature, the business will be conducted in closed session and a separate confidential minute will be produced.
- 5.19 Minutes of business considered in closed session will not be made available under the arrangements previously described.
- 5.20 The circumstances in which Governing Body business may be deemed to be confidential or commercially sensitive are described in Section 9 of the Policy.

## **6 COMMUNICATION OF INFORMATION**

- 6.1 Information on the above will be made available through a range of channels appropriate to the information in question, including:

On websites of the Group's companies, which will be maintained in order to ensure they provide an accessible, accurate and up-to-date information resource covering all of the items listed above

Tenants Handbook

Regular newsletters distributed to tenants, members and other interested parties.

In printed form, upon request from offices.

- 6.2 The Group's companies undertake to hold meetings with principal or other tenants' representative bodies, to provide the opportunity for tenants and owners to ask questions on Business Plans, and other published documents, after their publication and distribution.
- 6.3 The Group's companies will ensure that, wherever possible and practicable, information available to the public will be written in Plain English. Every effort will be made to avoid unexplained acronyms, jargon and technical language where Plain English alternatives

exist.

- 6.4 In order to overcome barriers caused by sensory impairments, language difficulties, literacy issues and other particular needs, the Group's companies will make information available on request in a variety of information formats and in translation. Policy documents will contain in the English version the following sentence:

*"< Name of company > will provide this policy on request at no cost, in large print, in Braille, in audio or other non-written format, and in a variety of languages".*

- 6.5 In addition, the Group's companies are committed to providing copies of any requested policy in a specified language, provided that a translator can be made available to translate the material.
- 6.7 The Group's companies will always endeavour to access a translation/translator service on request and to facilitate this will subscribe to suitably qualified specialist agencies.

## **7 ACCESS TO MEETINGS**

### **Annual General Meeting**

- 7.1 The Group's companies, in accordance with their constitution, will hold an Annual General Meeting (AGM) to which all members of the company will be invited.
- 7.2 As stated in Section 5 above, summary minutes of the Governing Bodies of the Group's companies will be published on websites, and printed copies can be made available on request for individuals without access to the Internet.

## **8 REQUESTS FOR INFORMATION**

### **Freedom of Information**

- 8.1 In addition to the information made publicly available, the Group's companies will comply with requests for information wherever practicable and appropriate, subject to considerations of confidentiality, cost and practicality.
- 8.2 Under the Freedom of Information (Scotland) Act 2002, members of the public can receive information that they request from a Scottish public authority, as defined in the Act, subject to certain exemptions such as the need for the protection of personal data, commercial sensitivity or national security.
- 8.3 Although not bound by the Freedom of Information Act (which does not extend to RSLs), the Group's companies will abide by the spirit of the legislation. In general terms, the Group's companies will respond positively to written requests for information, from whatever source and for whatever reason, unless:
- The request is vexatious (see below);
  - The company has already complied with the request;
  - The request is identical or substantially similar to a request previously received from the same individual or organisation;
  - The information is covered by an exemption from the requirements set out in

the Freedom of Information Act, and summarised below.

- 8.4 The Group's companies reserve the right not to comply with vexatious requests. They will have regard to the following principles described in Scottish Ministers' Code of Practice on the Act, should they ever consider that a request could be vexatious:

The Group's companies are not obliged to comply with a vexatious request;

The Group's companies will decide whether requests are vexatious;

Irritation or nuisance caused by the applicant should not, by itself, justify deciding that an application is vexatious;

The Group's companies will not deem a request for information as vexatious simply to avoid dealing with it;

The Group's companies will provide justification for its decisions to the applicant, based on clear-cut reasoning.

- 8.5 The Group's companies must be clear about the definition of a "vexatious request". In cases where such a request is considered vexatious by the staff member receiving the request, consideration will be given to seeking legal advice on the interpretation of a "vexatious request". Senior management will consider any necessary operational procedures required to deal with information requests in an appropriate manner

- 8.6 The other main exemptions relevant to the Group's companies are where the information:

- Is otherwise accessible;
- Is intended for future publication (within 12 Weeks of the request being received);
- Is commercially sensitive;
- Is related to investigations in respect of a potential prosecution or civil proceedings;
- Is likely to prejudice the prevention or detection of crime;
- Would be likely to substantially inhibit the free and frank provision of views for the purpose of deliberation;
- Would substantially prejudice the governance of the company;
- Concerns the operation of immigration controls, civil proceedings or the collection of any tax or duty;
- Relates to the categories of information covered by the Data Protection Act 1998, where disclosure is regulated. In the event of any conflict between the Freedom of Information Act provisions and the Data Protection Act requirements, the Data Protection Act takes precedence;
- Is of a nature where its disclosure is prohibited under other legislation or any contractual obligation, or would constitute contempt of court.

### **Procedures for Responding to Requests for Information**

- 8.7 The Group's companies will respond to any request for information within a maximum of 20 working days with the exception of requests covered by Data Protection legislation where a 40 day period will apply. The Group's companies will not provide any information that is considered to be in breach of the Data Protection Policy of the Group's companies

or is considered commercially sensitive.

- 8.8 Any information requests which are received by staff and have specific reference to the Freedom of Information (Scotland) Act 2002 must be reported to the Executive Officer (in the case of Caledonia) and in the case of Cordale to its chief officer, as soon as possible. Early notification is essential, as these officers will need sufficient time to source the necessary information to respond to the FOI request.
- 8.9 These officers will also ensure all draft responses and supporting information are provided in the case of Caledonia to the Business Services Director and in the case of Cordale to its chief officer within 15 days of receipt of the FOI request. This will provide these officers with a further 5 days to review the response, and where appropriate, make any necessary changes.
- 8.10 In cases where a request is considered vexatious by a member of staff, they should in the first instance, contact the above officers for advice. These officers will then consult with other staff and will advise whether the information request is to be classed as vexatious or that the requested information should be provided.
- 8.11 In relation to Caledonia, and in cases where there is an intention on behalf of a Directorate **not** to provide the requested information, an explanation must be provided by the relevant Director to the Association's Executive Officer. The Executive Officer in turn will advise the Business Services Director of any refusals to provide information in response to a FOI request. In relation to Cordale, its chief officer will make such decisions but a written audit trail will be created to ensure the decision can be scrutinised by authorised third parties at a later date
- 8.12 All FOI requests that have been refused information disclosure will be recorded by designated officers of the Group's companies
- 8.14 Information requests relating to published material, or matters already deemed to be in the public domain, should be provided as a matter of course. Designated officers of the Group's companies, when sourcing relevant information to respond to FOI requests, will make use of relevant information that is held in the public domain as a matter of course.
- 8.15 In addition to the above sources of information made publicly available, the Group's companies will comply with requests for information wherever practicable and appropriate. Any such requests will be subject to considerations of confidentiality in terms of the Data Protection Act 1998, cost and practicality.
- 8.17 The Group's companies have a consistent approach to what information is or is not provided in response to a FOI request. Full prior consideration will be given to business risk/implications that could arise from providing any requested information.
- 8.18 Information not published can also be made available. However reasonable judgment will be exercised in responding to information requests. Whilst Group company policy is to be open and transparent, the Group's companies will also ensure they do not disclose information which would be regarded as confidential or commercially sensitive, as described in this policy.

### **Charging for Providing Information**

- 8.19 The general policy of the Group's companies is not to charge for the copying of

documents, which are requested. The Group's companies will not charge for providing copies of any of the information listed in Section 5 of the Policy. However the Group's companies will charge a fee for each Data Protection request requiring a search for information on an individual consistent with Group Data Protection Policies. The fee level will be notified to the individual or organisation requesting the information in advance of any transaction.

- 8.20 However, for certain general requests, such as copies of archived information or a large volume of material, the Group's companies will also take account of the fact that the staff resources associated with providing information is met by tenants' rents. They reserve the right to charge for the cost of providing information, or to refuse to provide information, in the following circumstances:

If an information request will absorb significant staff resources either because of the nature of the request, or if copy material is requested with a frequency which affects the Group company's ability to manage its day-to-day business;

If the person requesting information is not a Group company tenant or service user. For example, the Group's companies receive a high number of requests from students seeking information for research purposes, and are not always able to meet such requests without compromising service standards for tenants.

- 8.21 In setting charges, the Group's companies will have regard to regulations issued by Scottish Ministers. The Group's companies may also decide to allow the person who has asked for information to view it at its offices, but without providing copies.

- 8.22 The policy on charging will be kept under review, and in light of any further guidance issued on the Freedom of Information (Scotland) Act 2002.

### **Requests for Information from the Media**

- 8.23 As a matter of policy, the Group's companies will respond openly to requests for information from the media. In certain cases after due consideration by senior managers, and where it is judged provision of information through the media will not be in the best interests of accurate reporting of information, the Group's companies may consider alternative means of making non-confidential information available in the public domain. However, in order to manage the release of information and to ensure that the release is consistent with the interests of the Group's companies, a set of procedures has been drawn up. These procedures authorise designated persons only to speak to the media. Any request from the media for information should be dealt with in accordance with these procedures and referred to the designated persons.

## **9 CONFIDENTIALITY**

### **Information Regarded as Confidential**

- 9.1 While fully committed to the principles of openness and accountability, the Group's companies also recognise the need, and in some cases the statutory duty, to maintain confidentiality in respect of certain information and activities.

- 9.2 In general terms, the following information will be regarded as confidential:

Personal information held about individuals (Governing Body members, tenants and other customers), subject to the right of the individuals concerned to have access to the information held on them;

Personal information held about members of staff relating to their employment, such as selection, remuneration, or any grievance and disciplinary action;

Matters relating to the business of the Group's companies that are defined as commercially sensitive (see below);

Matters related to legal disputes or actions concerning the Group's companies;

Matters relating to the business of funders of the Group's companies, partners and contractors and other third parties with which the Group's companies have or may have a business or commercial relationship, which have been provided to the Group's companies in confidence;

Items deemed on their individual merits to be confidential.

- 9.3 The Group's companies will apply the following definition of commercially sensitive information, as produced by the Cabinet Office:

*"... information that has an intrinsic commercial value where the value depends upon its confidentiality being maintained, or where although it may not have an intrinsic commercial value, its disclosure might unreasonably disadvantage the organisation, or person to whom it relates, in the conduct of their lawful business, commercial, financial or professional affairs."*

### **Safeguarding Confidential Information**

- 9.4 In the interests of clarity, all papers prepared for consideration by the Governing Bodies and their Committees or Sub Committees, which meet the criteria referred to above, will be marked as CONFIDENTIAL. As an additional safeguard, no names, addresses or other details, which would allow individuals concerned to be identified will be given in these papers. Confidential reports will be circulated to Governing Body members under separate cover, and will be made available to staff on a 'Need to Know' basis only. Agendas will be organized to allow all confidential items to be considered at one point in the meeting, so that staff members and others not entitled to be party to the consideration of the matter can leave the room. Governing Body discussions on these items will be recorded in a confidential minute, which will not form part of the publicly available record of the meeting.
- 9.5 Neither staff nor Governing Body members should pass on confidential information to people who have no need or right to know it. All requests for information, which are covered by the above criteria, will be refused, with an explanation to the person or individual requesting the information as to why it cannot be provided. The timescale for responding to such requests is the same as that required for requests to which the organisation responds positively, i.e. 20 working days.
- 9.6 Where Governing Body members receive an enquiry from a tenant or other customer, they should advise the person to contact the appropriate member of staff rather than dealing with the enquiry themselves. Confidential information must not be used for personal gain or benefit, nor passed to others who might use it in such a way.

- 9.7 Confidentiality has to allow for the exceptional circumstances where the law requires disclosure, or to safeguard individuals. The following exceptions will apply in relation to the disclosure of personal information:

Where personal information is requested by the individual concerned, in circumstances covered by data protection legislation and the Group's companies data protection policy (see below).

Where an individual has complained or appealed to Group Company Governing Bodies, Committees or sub Committees in accordance with complaints or appeals policies and procedures.

Where the Group's companies have a legal obligation to provide information to a third party, for example under a court order.

Where information is requested by the police or other third party, covered by local protocols on sharing information.

Where information is requested for the purposes of providing a reference.

Where the individual concerned is deemed to be at risk or in need of care or support, and where the disclosure of information to relatives or other professionals is necessary to protect the individual.

Where a Governing Body member or employee has a serious concern about the wrongdoing or improper conduct within the organisation, and cannot raise it without breaching the guidelines of Group Company Whistleblowing policies

### **Data Protection**

- 9.8 The Group's companies will comply with the Data Protection Act 1998, including any subsequent related legislation and all associated guidance, which regulate the use of personal data.

- 9.9 The Data Protection Act 1998:

Requires those who record and use personal information to be open about their use of that information, and to observe sound practices about how the information is handled;

Provides rights to individuals in relation to personal data or information held about them on computer and in most manual systems.

- 9.10 The Group's companies have a data protection policy, setting out how the organisations will meet requirements of the legislation and observe best practice in data protection.

### **Breaches in Confidentiality**

- 9.11 Breaches of this Confidentiality policy, whether inadvertent or deliberate, may, and in serious cases will, result:

- In the case of staff, in disciplinary action, in accordance with disciplinary

procedures;

- In the case of Governing Body members, in investigation and possible action under the Code of Conduct for Governing Body Members.

## **10 POLICY REVIEW**

- 10.1 The Group's companies will review this policy every three years. More frequent reviews will be considered if, for example, there is need to respond to new legislation/policy guidance. Reviews will consider legislative, performance standard and good practice changes, and the experience of operating this policy.
- 10.2 A summary of this policy will be published by the Group's companies and will be displayed in the reception areas of Group company offices and available to download from Group company websites

## **11 CUSTOMER SERVICE**

### **Confidentiality**

- 11.1 All information given by customers in relation to this Policy will be treated as confidential and will not be discussed with third parties without their permission. The Group's companies will comply with the requirements of the Freedom of Information Act 2002 and the Data Protection Act 1998 in this regard.

### **Customer Satisfaction**

- 11.2 The Group's companies are committed to a high level of customer satisfaction in the delivery of this Policy, seeking continuous improvement. Satisfaction with the full range of services provided by the Group's companies will be measured regularly, including the effectiveness of the objectives of this Policy, and results will be disseminated to tenants and other service users. In addition, the Group's companies will carry out on-going customer satisfaction surveys into the effectiveness of the objectives of this Policy.

### **Complaints**

- 11.3 Our aim is to get it right first time. However, the Group's companies have published Complaints Handling Procedures which are compliant with the Scottish Public Services Ombudsman's requirements. The procedure can be used where there is dissatisfaction with this policy or its operation. The Complaints Handling Procedure is available as a separate document from the Group's company offices and websites. As with all policies, it can be made available in audio formats, in Braille, in large print or in translation.