



# Openness and Transparency Policy

Approved by: RHP Board

Approved on: 6 October 2022

Next review Date: September 2023

August 2022

Version 1.6

## 1. Policy Statement

As an organisation, RHP Group aims to be open and transparent about its ways of working. This policy provides clarity about how we provide information as a business and sets out how we strive to be transparent and open.

We want to be open and honest with our customers, colleagues, stakeholders, communities, and anyone else we work with.

RHP is committed to providing equal opportunities and fair treatment to all people in our organisation, as well as the people and communities we serve, in accordance with the Equality Act 2010. We will respond positively to requests to make information available in alternative formats that meet individuals' needs.

We aim to set a good example of business practice by explaining what we do and why we do it, as well as accepting responsibility for our actions

- ▶ We want to explain and demonstrate to others that we are careful with our finances and spend wisely
- ▶ We want to build business relationships based on mutual trust and respect, so that people want to work with us or be our customers
- ▶ We want to set a good example for our sector by sharing as much information as we can and, where possible, more than is legally required.
- ▶ We want to serve our communities in an open and transparent manner by sharing information in the best interests of our customers, which is where accountability really begins

This policy outlines how we will publish important information in a clear and transparent way, so that how we work can be scrutinised – we are committed to being open and accountable in our work.

## 2. Contents

Part 1 – Openness and Transparency at RHP Group

Part 2 – Information we share

## 3. Guiding Principles

We recognise the need to be accountable to our customers and anyone who has an interest in how we operate. This may include partners in local and central government such as MPs and Councillors, employees, former Board members, shareholders, suppliers, investors, and the communities within which we operate. We will meet any requirements set out by law and the Regulator of Social Housing.

- ▶ We will respond to any requests for information in a timely manner.
- ▶ We will provide information in a clear, simple, and accessible way on our website and in other formats if required.
- ▶ We will provide meaningful information about how we are run and our performance.
- ▶ We may refuse to provide information if it is personal, commercially confidential, or not cost effective.

## 4. Reference Documents

- ▶ UK Corporate Governance Code
- ▶ The Code of Conduct.
- ▶ Data Protection Act 1998
- ▶ Adopted NHF Codes of governance and conduct

## 5. Responsibilities

Members of the Executive Group and Board members are responsible for ensuring that this policy is implemented.

All RHP employees and Board members are responsible for making themselves aware of the content of this policy, and for ensuring they operate in line with the transparency principles outlined above.

The Governance and Reward Committee will receive annual reports from the Chief Executive on the effectiveness of this policy, which will include details of any complaints or representations made on its function.

All Board and Committee meetings of the Group will be closed, and not open to the wider public. Attendance to Board meetings will be restricted to members, and relevant officers of the business.

The Board may decide to open a meeting should:

- ▶ they agree that it is in the best interests of the business to do so
- ▶ it would not involve disclosing personal information as defined by the Data Protection Act
- ▶ the information is not confidential or commercially sensitive.

In such circumstances the Group will publicise the time, venue, and date of such meetings.

The RHP website will be regularly updated and offer a clear explanation of how we are governed. This will include keeping up to date Board member biographical details and photographs.

Registers of Interests will be maintained for all Board and committee members and employees. These registers are available for the public upon request.

## 6. Procedures for implementation

The Group's Board, following sign-off from the Executive Group will approve what information is published, how and the frequency of publication, taking into consideration our regulatory and legal obligations.

The Communications team will keep a record of requests for information from journalists for reporting purposes.

Heads of Service within the business will ensure that all data published on RHP's website relevant for their area is up to date and accurate.

All teams will ensure that the publication and / or sharing of information does not infringe the UK General Data Protection Regulations or any other legislation and will keep records of any requests from customers, members of the public and other stakeholders.

When publishing information RHP will consider:

- ▶ The Regulator of Social Housing's requirements for us to publish standards, performance, value for money and certain expenditure information to customers

- ▶ The Charter for Social Housing Residents (Social Housing White Paper)
- ▶ National Housing Federation’s Code of Governance

For absolute clarity the group is not a public body and is, therefore, not required to comply with requests made under the Freedom of Information Act (2000) or the Environmental Information Regulations (2004), except where we are carrying out statutory duties on behalf of a local authority or other public body. We do, however, fully support the act's principles and will work within reason to support requests for information if they are made, provided the information is not 'commercially sensitive' and answering the query will not cost too much or take up too much employee time.

## 7. Compliance with the Policy

All Board members and employees must comply with this Policy. Failure to do so may damage customers’ interests, employee morale, professional relationships and RHP’s reputation. Breaches of confidentiality are a serious matter and may be considered as gross misconduct and could result in dismissal of employees or removal of Board members.

Where a Board member or employee has a serious concern about wrongdoing or misconduct within the organisation and wishes to raise this, they will be able to do so under the Whistleblowing Policy, without being considered to have breached confidentiality requirements. While this Policy deals specifically with RHP, its overall principles and requirements will also apply to other companies within the RHP group. For concerns regarding Co-op Homes these should be raised with the Managing Director of Co-op Homes.

## 8. Equal Opportunities

RHP is committed to ensuring equal opportunities and fair treatment for all people in our work, in compliance with the Equality Act 2010. We will respond positively to requests to make information available in other formats that meet individuals’ needs. For example, where a customer has difficulty with sight, hearing, or language, we will seek to provide information in a form that meets their requirements.

## 9. Equality Impact Assessment

This Policy is equally applicable to all and has no detrimental impact on protected characteristic groups as specified within the Equality Act 2010.

## 10. Policy Review

This Policy will be reviewed every three years or earlier, in line with regulatory or legislative guidance/changes or good practice guidelines.

## 11. Version Control

Version	Date	Author	Changes
1.0	18 July 2022	DPO	EG 20 July 2022
1.1	31 July 2022	Executive Director of Strategy, Transformation & Culture	Review and comments to Head of People, Communications and Engagement
1.2	2 August 2022	Executive Director of Strategy, Transformation & Culture	Reviewed – Assistant Company Secretary

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<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Changes</b>
1.3	2 August 2022	Executive Director of Strategy, Transformation & Culture	Amended comments, distribution to EG
1.4	9 August 2022	Assistant Company Secretary	Amendments to Part 2, distribution to EG.
1.5	26 August 2022	Executive Director of Strategy, Transformation & Culture	Amendments accepted, comments need addressing
1.6	15 September 22	Executive Director of Strategy, Transformation & Culture	Approval by Group Governance & Reward Committee and subsequently RHP Group Board

## PART 1: OPENNESS AND TRANSPARENCY AT RHP

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### Why is this important?

We believe that being open and transparent is important not only for providing fair, efficient, and effective customer service, but also for sharing information about what we do and why we do it, which helps colleagues and customers be the best they can be.

We believe that openness and transparency help us to improve how we do things but also means others can be confident we're running our business the right way.

See Part 2 of this guide for a full list of the information we share.

### What type of information do we share?

Here at RHP we share two types of information.

1. Information we have to share – to comply with law or regulation; and
2. Information we choose to share – to help customers and colleagues understand what we do and why we do it.

Overall, we aim to share more information than we legally have to.

Things we must share under law or regulation include:

- ▶ The remuneration of our Board members and CEO: to comply with Financial Reporting Council (FRC) guidelines, we publish this in our Annual Financial Report.
- ▶ Information about our performance standards and commitment to achieving value for money: the Regulator of Social Housing (RSH) has requested that we publish this information so that our customers and stakeholders can see how we manage homes and assets.
- ▶ The code of governance we employ: RHP employs the National Housing Association Code of Governance. In our Annual Report and Statement of Accounts, we must make statements about how we have complied with the Code.
- ▶ Information on payments made to suppliers is available on request: in exchange for grant funding, the RSH requests that we publish this information in connection with the grant-funded building programme. Furthermore, this information is available on request.

### How do we decide what to share?

When deciding whether to share a piece of information, we think about:

- ▶ who will find it useful;
- ▶ how we'll share it, so it can be accessed by everyone who needs or wants to see it;
- ▶ how much it'll cost to share it – will it be a good use of money:

- ▶ whether anyone could be upset or harmed by it;
- ▶ whether it contains confidential or commercially sensitive business information;
- ▶ what the Data Protection Act 1998 will let us legally share.

**The Data Protection Act 1998**

RHP is required to comply with the Data Protection Act of 1998, which specifies what information we can legally share and how we should do so. We also have policies and procedures to assist colleagues in understanding their responsibilities.

We may need to limit the amount of information we can share in some cases due to our legal obligation to keep personal information private and confidential.

**The Freedom of Information Act 2000**

The Freedom of Information Act of 2000 (or FOIA) applies only to public bodies (such as local governments) and does not apply to RHP, but we fully support its principles and will work within reason to support information requests if they are made, provided the information is not commercially sensitive. However, if we are subcontracted to do work on behalf of a FOIA-covered organisation, that organisation may request that we provide information about the work we're doing for them in order for them to respond to a FOIA request.

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## PART 2: INFORMATION WE SHARE

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Information we share	Where it can be found
<b>Remuneration Information</b>	
Details of CEO’s Remuneration	▶ Annual Report & Accounts (copy on RHP website)
Non-Executive Director Remuneration (by role)	▶ Annual Report & Accounts (copy on RHP website)
Expense Policy	▶ Internal Intranet “Lighthouse”
Gender Pay Gap Data	▶ RHP website
<b>Recruitment Information</b>	
How we recruit	▶ RHP website ▶ Internal Intranet “Lighthouse”
Performance Management Policy	▶ Internal Intranet “Lighthouse”

Financial information and Value for Money	
Annual Supplier spend for those above £50,000 pa	▶ By individual request
Procurement framework	▶ RHP website
Value for Money	▶ RHP Website ▶ Internal Intranet “Lighthouse”
Rent and service charge setting	▶ RHP website
Group and Group entities annual Financial Statements	▶ Annual Report & Accounts (copy on RHP website)
Service and Performance	
Access to our homes and services	▶ RHP Website
Customer Annual Report	▶ RHP Website
Complaints Process	▶ RHP Website
Governance	
Members of the Board and Board Committees	▶ RHP website ▶ Annual Report & Accounts (RHP Website)
Statement of Compliance with National Housing Federation Code of Governance	▶ Annual Report & Accounts (copy on RHP website)
Inclusion Policy/Strategy	▶ RHP Website
Customer influence and engagement	▶ RHP Website
Modern Slavery and Human Trafficking Statement	▶ RHP Website
Shareholding Policy	▶ Internal Intranet “Lighthouse”