



COMMUNICATIONS POLICY

Written by:	Chief Executive	Version:	4
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1. Background & Purpose

- 1.1 The Housing (Scotland) Act 2010 introduced the Scottish Social Housing Charter & Scottish Housing Regulator (SHR) with a new regulation and performance approach, requiring greater levels of tenant scrutiny of performance.

SHR Regulatory Standard 2 states: *‘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.’*

SHR Regulatory Standard 7.8 states: *“The RSL complies with regulatory guidance on tenant consultation, ballots and authorisation.*

The Charter specifies outcomes and standards for the Customer/Landlord Relationship in relation to Equalities, Communication and Participation.

- 1.2 We recognise that we are accountable to our customers and that, as a recipient of public funds, we have a wider accountability to the taxpayer.
- 1.3 We also accept that effective communication with partner agencies, our funders and our internal stakeholders is essential for ensuring the best possible understanding of our aims, objectives and activities.
- 1.4 We aim to be open about what we do, publish information about our activities and wherever possible agree to requests for information about the work of our Management Committee and our organisation as a whole.

2. Purpose

- 2.1 The purpose of this Policy is to describe how communications will be used to ensure all to whom we are accountable or provide services to are kept informed about our activities and services and are able to give their feedback.

3. Scope

- 3.1 This Policy applies to all staff, committee and any agents who are involved in preparing or delivering communications on our behalf.

3.2 Related policies are:

- Customer Engagement
- Data Protection
- Privacy Policy
- Publication Framework
- Tenant Participation Strategy

4. Target audiences

4.1 Our key external target audiences are:

- Tenant and (sharing) owners
- Applicants
- Partner organisations
- The communities in which we provide services
- The Scottish Housing Regulator
- The Scottish Housing Sector
- The Scottish Government and other funders

4.2 Our internal audiences comprise staff, committee members and any subsidiary companies.

5. Communication Standards

5.1 All communications (except where otherwise prescribed) will be:

- Worded in clear, plain English
- In a format or medium suited to the needs of the target audience
- Designed to encourage two way dialogue wherever possible
- Open and honest (consistent with personal and commercial confidentiality)
- Timely and relevant
- Courteous, respectful and sensitive

6. Information to be communicated

6.1 The key information which will be communicated is:

- How to access services
- Service standards
- Changes to and developments in services and how to influence them
- Organisational aims and objectives and any planned changes
- Performance targets and achievements
- Complaints, Compliments and other feedback
- Annual Assurance Statement which will determine our self-assessment against Regulatory Requirements & Standards

- 6.2 Communications planning will be a standing item on monthly Leadership Team meetings to which the Communications & Engagement Officer (C&EO) is invited to participate.
- 6.3 The Association has a Communications Working Group led by the C&EO and attended by Chief Executive, Director of Finance & Asset Management, Head of Corporate Governance, Head of Housing & Customer Services, Admin & Governance Assistant and Energy Officer.

The Group meet every 2 months and discuss eg, engagement events, open days, newsletters, Annual Reports and Management Committee Updates.

- 6.4 From July 2019 onwards, and in addition to the Management Committee Updates, the Association will publish Management Committee Minutes as required by the Scottish Housing Regulator and also in the spirit of the Freedom of Information (Scotland) Act (Fol) which will apply from 11 Nov 2019 to all Scottish Registered Social Landlords.
- 6.5 In the interest of openness and transparency, wherever possible requests for information will be granted subject to compliance with GDPR and Fol legislative requirements.

7. Methods of Communication

- 7.1 Methods of external communication may include:
- News releases
 - Mail shots
 - Newsletters
 - Social media
 - Website
 - Email
 - Text Messaging
 - Management Committee Update
 - Publishing Management Committee Minutes
 - Publishing Fol requests and responses on our website
 - Events
 - Talks/Presentations
 - Radio interviews
 - TV interviews
- 7.2 The selected method will be consistent with the subject matter and the needs of the target audience.
- 7.3 Internal communications, in addition to those required under employment law, will include:
- Monthly Staff Planning Meetings attended by all staff
 - Post Leadership Team meeting feedback to staff teams

- Access to committee papers (subject to GDPR, other legislative, commercial or good practice restrictions)

8. Confidentiality

8.1 All communications must be carried out in a manner that complies with the requirements of the FoI and General Data Protection Regulations legislation.

9. Different Communication Needs

9.1 Key documents will be provided in different languages and formats on request. We will also access translation and interpreter services via Language is Everything and/or Language Line for clients who require assistance.

10. The Media

10.1 The following media have been identified as relevant to OHAL activities:

- Chartered Institute of Housing Scottish Housing News (enews)
- SFHA Housing Scotland Today (enews)
- The Orcadian
- SFHA Housing Scotland Magazine
- Radio Orkney

10.2 The Association will maintain good relations with the media and will, wherever possible, respond positively to requests for comments.

10.3 All media enquiries will be referred to the Chief Executive or in their absence the Director of Finance & Asset Management. If neither can be contacted they should be referred to the Head of Corporate Governance who will determine whether they are sufficiently urgent to warrant referral to the Chair/Vice Chair. If they are not, the press will be advised there is no-one available to comment.

10.4 The Communications & Engagement Officer will be sighted on all relevant media enquiries and communications in order to assist in preparing responses.

11. Responsibilities and Authorisation

11.1 All staff are responsible for ensuring that both internal and external communications comply with the standards in this Policy.

11.2 Only the Chief Executive (or in their absence the Director of Finance & Asset Management) is authorised to respond to queries from the media. They may, in certain circumstances delegate this duty to another member of staff where the topic is not controversial and is within their area of expertise.

11.3 The Chair (or in their absence the Vice Chair) may act as spokesperson for the Association for which appropriate briefing will be provided by staff when

required.

- 11.4 During pre-arranged publicity events where designated staff are on duty they will be given the appropriate delegated authority to speak to the media on subjects relevant to the event. In this case there will be a briefing before the event to agree how this will be handled.
- 11.5 In accordance with the SHR's Tenant Consultation & Approval Statutory Guidance if the Association were to consider the sale or transfer of tenanted houses it must adhere to the consultation requirements contained within.

12. Monitoring & Review

- 12.1 This Policy will be reviewed every 5 years or sooner if required due to change in legislation, regulation or good practice.