

at home with...



Freedom of Information Policy

Reference / Issue No:	G9	1
Date of this version:	January 2023	
Next review due:	January 2026	
Lead responsibility:	Governance	
Contents:	23 pages	5 appendices

Contents

1	Principles	3
2	Scope	3
3	Roles And Responsibilities	3
4	Internal Review Of Requests	4
5	Advice And Assistance	4
6	Publication Scheme	4
7	General Rights Of Access	5
8	Charges And Fees	6
9	Exemptions	7
10	Escalation Procedure	8
11	Copyright	9
12	References	9

1 Principles

- 1.1 The Freedom of Information (Scotland) Act 2002 (FOISA) requires that all housing associations/co-operatives in Scotland must produce and maintain a publication scheme.

A general right of access to all recorded information held by Fife Housing Group (FHG). As FHG was established on June 1996, records are only available from this time. Subject to exemptions specified in the Act, a requester has the right to ask “do you have it” and “can I see it”.

A duty on every RSL to adopt and maintain a Publication Scheme, this must detail all of the key information that we publish and how you can access it. Our Publication Scheme is available to view on the FHG website.

- 1.2 FHG supports the principle that openness should be the norm in public life. The Group also recognises that individuals have the right to privacy and confidentiality, and this policy does not overturn the common law duty of confidentiality, or statutory provisions, that prevent disclosure of personal information. The processing of personal information is covered by the GDPR (General Data Protection Regulation). FHG must still be able to carry out its duties effectively and ensure that any exemptions outlined in the Freedom of Information Act are applied appropriately (see Appendix C).

2. Scope

- 2.1 This policy applies to all employees, Board members, agency colleagues, temporary colleagues, and volunteers and provides a framework to ensure compliance with the Act.

3. Roles and responsibilities

3.1 Chief Executive

The Chief Executive is ultimately responsible for compliance with the FOISA Act 2002.

3.2 Directors and managers

All directors and managers are responsible for ensuring that this policy is communicated and implemented within their area of responsibility. Advice or assistance regarding this policy can be obtained from the Director of Finance, Governance and Assets.

It is the responsibility of directors to ensure that records management within their area is compliant with FHG’s Records Management Policy, in order to facilitate prompt responses to FOI requests.

3.3 Chief Executive and Governance Assistant

The Chief Executive and Governance Assistant is responsible for maintaining and updating the Publication Scheme, logging and monitoring where FOI requests are coming from, advising on the use of the exemptions and providing assistance to those who request it.

3.4 All colleagues

To assist FHG in fulfilling its statutory obligations, all colleagues are made aware of their responsibilities regarding the FOISA Act via this policy.

All colleagues are responsible for ensuring that all FOI requests they receive are passed directly to the Chief Executive and Governance Assistant for logging and monitoring.

All colleagues are responsible for ensuring that an accurate response, where requested, is provided to the Chief Executive and Governance Assistant to ensure FHG complies within the 20 working day deadline. Colleagues will be given a deadline in which they must respond to by the Chief Executive and Governance Assistant that must be adhered to.

4. Internal review of requests

- 4.1 Draft responses to FOI requests will be reviewed by the Chief Executive and Governance Assistant in the first instance.
- 4.2 If information requested is contentious, responses should be reviewed by the Director of Finance, Governance and Assets or escalated to the CEO for final review, in exceptional cases the Board may be asked to approve the release or the refusal of the information. Once approval has been received, the Chief Executive and Governance Assistant will send a response to the FOI requester.
- 4.3 FHG has adopted the ICO request handling flowchart which can be found in Appendix A.

5. Advice and assistance

- 5.1 FHG has a duty to provide advice and assistance to requesters and would-be requesters. Responsibility for this is delegated to the Chief Executive and Governance Assistant, who will clarify any requests that are ambiguous and provide an escalation route to requesters who are dissatisfied with FHG's response to their request.

6. Publication Scheme

- 6.1 FHG is required to produce a Publication Scheme, which details information about FHG, its actions and decisions, services, spending and policies. See appendix B for further detail on the content of the Publication Scheme.

- 6.2 FHG has adopted the Model Publication Scheme, which has been approved by the Information Commissioner and has been divided into seven classes. The scheme is available on request from the Chief Executive and Governance Assistant or via the website: <https://fifehg.org.uk/who-we-are/freedom-of-information-foi/>
- 6.3 The Chief Executive and Governance Assistant will seek approval to publish frequently requested information on the website in line with our publication scheme categories, the responsibility for updating the information to the required timescales on the website will be as outlined in appendix E.

7. General rights of access

- 7.1 The Act gives people a general right of access to recorded information held by FHG (subject to certain exemptions – see Appendix C). This means that any person who makes a request has the right to:
- be informed in writing whether FHG holds the information requested, this is the duty to confirm or deny; and
 - request the information that FHG holds.
- 7.2 The Act requires that requests are responded to within 20 working days. Where FHG decides to make use of a condition or exemption to withhold information the requester will be informed as soon as possible, and in any case within 20 working days.
- 7.3 For a request to be valid under the FOISA Act 2002 it must be in writing, but requesters do not have to mention the Act or direct their request to a designated colleague, you cannot ignore or refuse a request simply because it is addressed to a different colleague. Any letter or email to a public authority asking for information is a request for recorded information under the Act.
- 7.4 This does not mean you have to treat every enquiry formally as a request under the Act. It will often be most sensible and provide better customer service to deal with it as a normal customer enquiry under your usual customer service procedures. The provisions of the Act need to come into force only if:
- you cannot provide the requested information straight away; or
 - the requester makes it clear they expect a response under the Act.
- 7.5 As recommended in the Lord Chancellor's Code of Practice (<https://ico.org.uk/media/for-organisations/documents/1624142/section-46-code-of-practice-records-management-foia-and-eir.pdf>), FHG has set out procedures about how requests for information are dealt with, and these will be made available to colleagues and the public via the intranet and website respectively.
- 7.6 Whilst FHG cannot ask the requester the reason or purpose for the request, they can ask for more specific information in order to be able to correctly identify and supply the information the requester is requesting, providing it is subject to FOI (not

exempt). Guidance in this regard is to be provided from the Chief Executive and Governance Assistant that the FOI request has been forwarded to for response.

- 7.7 The Act treats all requesters alike so FHG should not normally seek to verify the requester's identity. However, FHG can check a requester's identity if it is clear the requester is using a pseudonym or if there is legitimate grounds for refusing their request.
- 7.8 Requests of a 'round robin' nature will be forwarded to the most relevant organisation to collate if appropriate. These are requests that are sent to multiple organisations requesting the same information from each, sometimes nationally, and could be more appropriately responded to by national bodies.
- 7.9 In instances when a request is made for information that is held by a provider, the requester will be informed that FHG does not hold this information and details of the provider that does hold the information will be provided.

8. Charges and fees

- 8.1 On 1 September 2013, amendments were made to the The Freedom of Information (Scotland) Act 2002 and the Data Protection Act 1998 via the Protection of Freedoms Act 2012. One of the key amendments made relates to public authorities being able to charge a fee for allowing the re-use of any datasets containing copyright material.
- 8.2 FHG will not charge for information which is contained in the Publication Scheme. FHG, however, reserves the right to charge for copies of this information. These charges will be in accordance with the fees regulations, (Statutory Instrument 2004 No 3244, The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004).
- 8.3 The maximum charge for costs incurred is £10. In the event that charges are incurred, this will be reviewed on a case-by-case basis by the Director of Finance, Governance and Assets. The Chief Executive and Governance Assistant will liaise with the Finance team to ensure that payment is received prior to progressing with the request.
- 8.4 If the cost of the request would exceed £450, FHG has the right to charge the requester or refuse to provide the information requested. This cost is most likely to be exceeded by the cost of colleagues' time taken to respond to the request. Regulation 7(5) indicates that colleagues' time is to be charged at the flat rate of £25 per hour, irrespective of whether a higher rate is actually incurred by internal colleagues or charged by external contractors.
- 8.5 A public authority can also charge for the time it takes a colleague to actually redact the exempt information. This cost can be included because it is part of the cost of communicating the information under regulation 7. For example, if it takes one employee 45 minutes to redact the information which is not to be disclosed then the public authority can charge £18.75 for this activity. VAT will not be charged if the information is only available from a public authority.

- 8.6 For the avoidance of doubt, any colleague time spent redacting exempt information cannot be taken into account when initially estimating whether it would exceed the appropriate limit to comply with the request.
- 8.7 In conjunction with Regulation 6(3) of the Fees Regulations, FHG can charge for the costs it reasonably expects to incur which could include photocopying and postage. Colleagues' time under 18 hours cannot be charged for because the cost does not exceed the limit i.e. £25 x 18 hours = £450.
- 8.8 If a decision is taken to charge the requester, a costing form must be completed and returned to the Chief Executive and Governance Assistant. The costing form can be found in appendix D. The fees notice must be issued to the requester within 20 working days of the request being received.
- 8.9 In accordance with section 10(2) of the Freedom of Information Act, the time for compliance should not include the period beginning with the day on which FHG gives the notice fee to the requester and ending on the day on which FHG receives the fee. If FHG does not receive payment within three months of issuing a fees notice, it is no longer obliged to respond to the request.

9. Exemptions

9.1 Some information will be exempt from disclosing under the The Freedom of Information (Scotland) Act 2002 for various reasons. The exemptions are listed in Appendix C, but the more common reasons FHG is likely to refuse the release of information for are below. In the event that a request is refused because an exemption is applicable, the requester should be given a full explanation of the exemption being used and why it is applicable.

9.1.1 Section 12 – Compliance would exceed cost limit

If it would cost FHG more than £450 to comply with the request, the request can be refused if the requester does not make the payment within three months of the fee notice being issued.

9.1.2 Section 14 – Repeated or vexatious requests

If a request is a repeat of an earlier request and there has been no change to the information since, FHG need not send the information to the requester again. Sometimes a request may be very obviously unreasonable or objectionable, in which case the requester will be informed that FHG will not respond as the request is considered vexatious. Other times it may not be so clear cut and requests that appear as if they may be vexatious will be escalated to the Chief Executive.

9.1.3 Section 21 – Information already reasonably accessible

If the information requested is already reasonably accessible in the public domain then the information does not need to be provided by FHG and the requester should be informed of where they can access the information. This would include information available via the Publication Scheme or on the FHG website. If the information is available in the public domain but not reasonably accessible to the

requester, for example, if they do not have internet access, FHG should provide the information to them in an appropriate way (e.g. by post).

9.1.4 Section 22 – Information intended for future publication

If the information requested is intended to be published at a later date, it does not need to be disclosed. There does not have to be a publication date agreed for this exemption to apply.

9.1.5 Section 40 – Personal information

If the information requested is personal data belonging to the requester it should be treated as a subject access request (refer to Subject Access Request Policy and Procedures). If the information requested concerns personal data of a third party who is still alive this would be exempt according to their rights under the Data Protection Act 1998.

9.1.6 Section 43 – Commercially sensitive

If complying with the request would prejudice, or would be likely to prejudice, someone's commercial interests then the information does not have to be disclosed. However, FHG would have to consider the public interest test in order to decide whether public interest outweighs the duty of confidentiality owed to a third party contractor and the potential legal action that could be taken following disclosure. Legal advice may need to be sought in such cases.

10. Escalation procedure

- 10.1 The requester should be informed of the escalation process on receipt of their request. If the requester is dissatisfied with the way in which FHG has dealt with their request, they should contact the Director of Finance and Governance in the first instance.
- 10.2 If the requester remains dissatisfied with FHG's response after escalating to the Director of Finance, Governance and Assets, or they wish to appeal against the refusal of all or part of their request, they could escalate this to the Information Commissioner's Office. This process is outlined on the Information Commissioner's Office website (www.ico.org.uk) and they can be contacted at the following address:

The Information Commissioner's Office - Scotland
45 Melville Street
Edinburgh
EH3 7HL
Tel: 01625 545 745
E-mail: mail@ico.gsi.gov.uk

11. Copyright

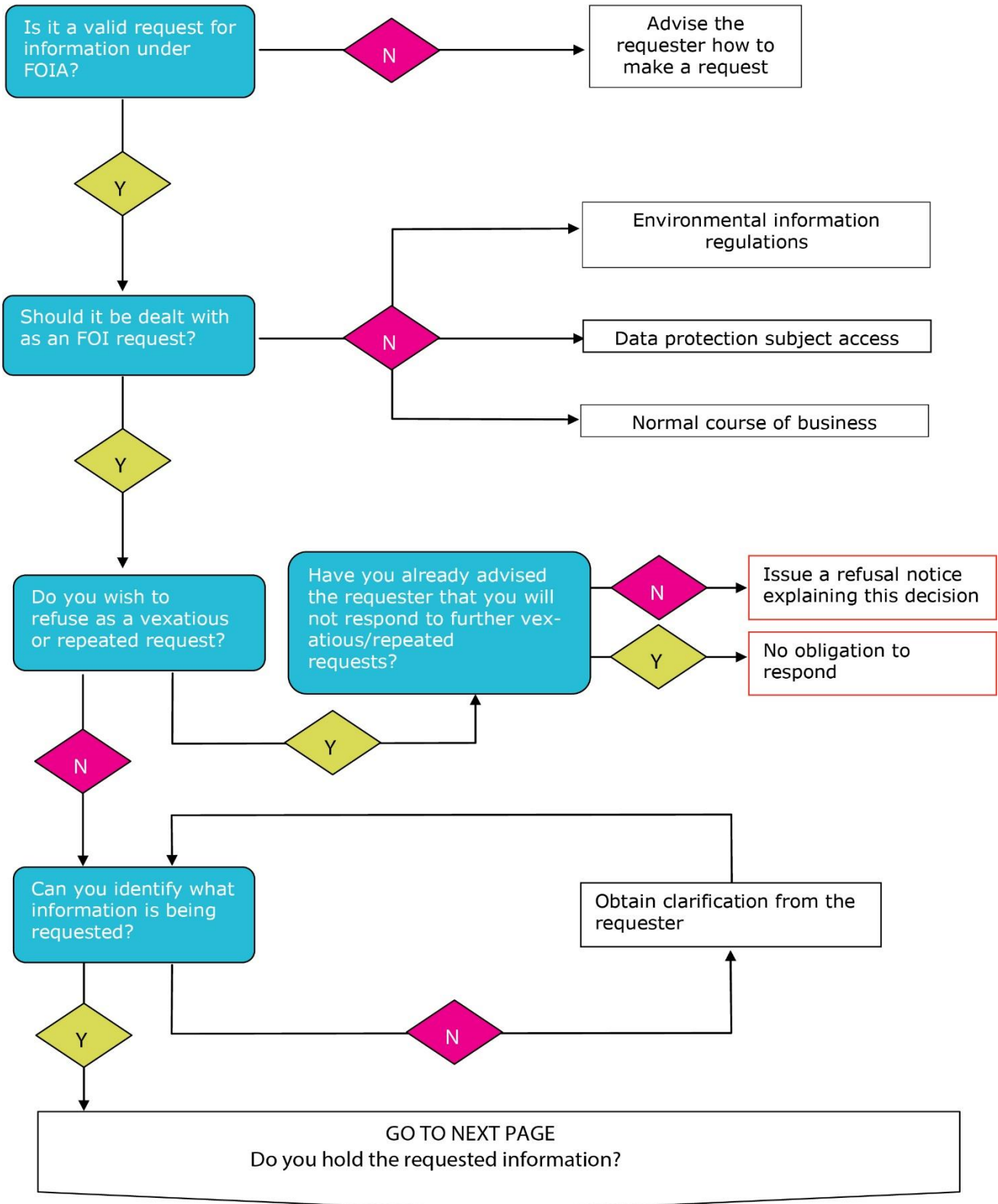
- 11.1 The supply of information under the FOI does not give the person or organisation who receives it an automatic right to re-use the information in a way which would infringe copyright, for example, by making multiple copies, publishing and issuing copies to the public. Any information which is supplied will continue to be protected by copyright law. In most cases, copyright will belong to FHG, although copyright may belong to other organisations or individuals.
- 11.2 Brief extracts (e.g. short quotations) of any material which is supplied under FOI may be reproduced under the fair dealing provisions of the Copyright, Designs and Patents Act 1988, provided this is done for research or private study for non-commercial purposes, criticism, review or news reporting. More extensive re-use must only be carried out with prior written permission from FHG, or the copyright owner if copyright is not owned by FHG. Otherwise, re-use is likely to infringe copyright.
- 11.3 In some cases, FHG may have to provide information in response to an FOI request where the copyright of the information is owned by another organisation or individual. If the Freedom of Information Act requires us to release the information, any copying or reproduction which we have to do will not infringe copyright. However, the person who receives the information is likely to need the permission of the rights owner if they want to re-use the information (see above).

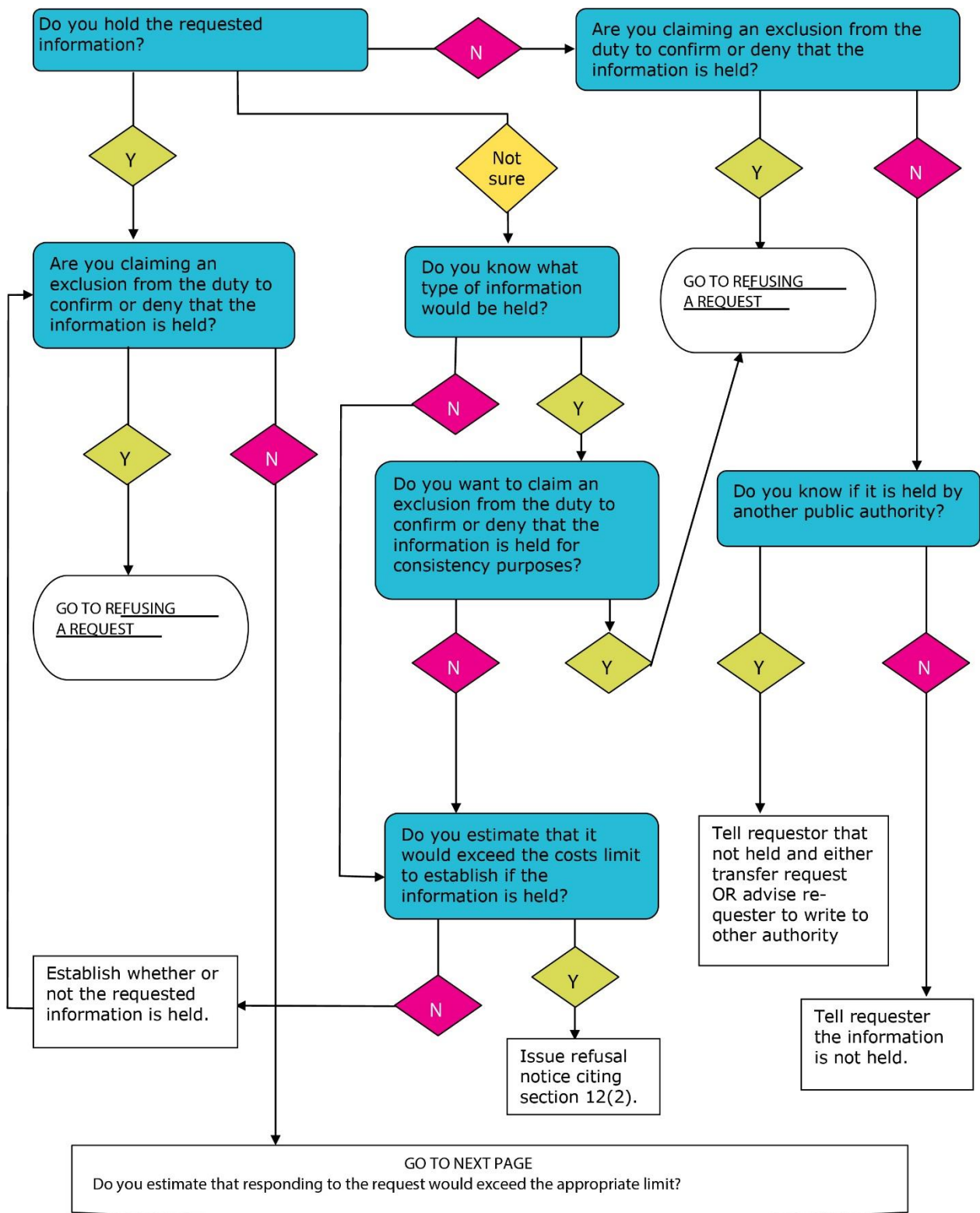
12. References

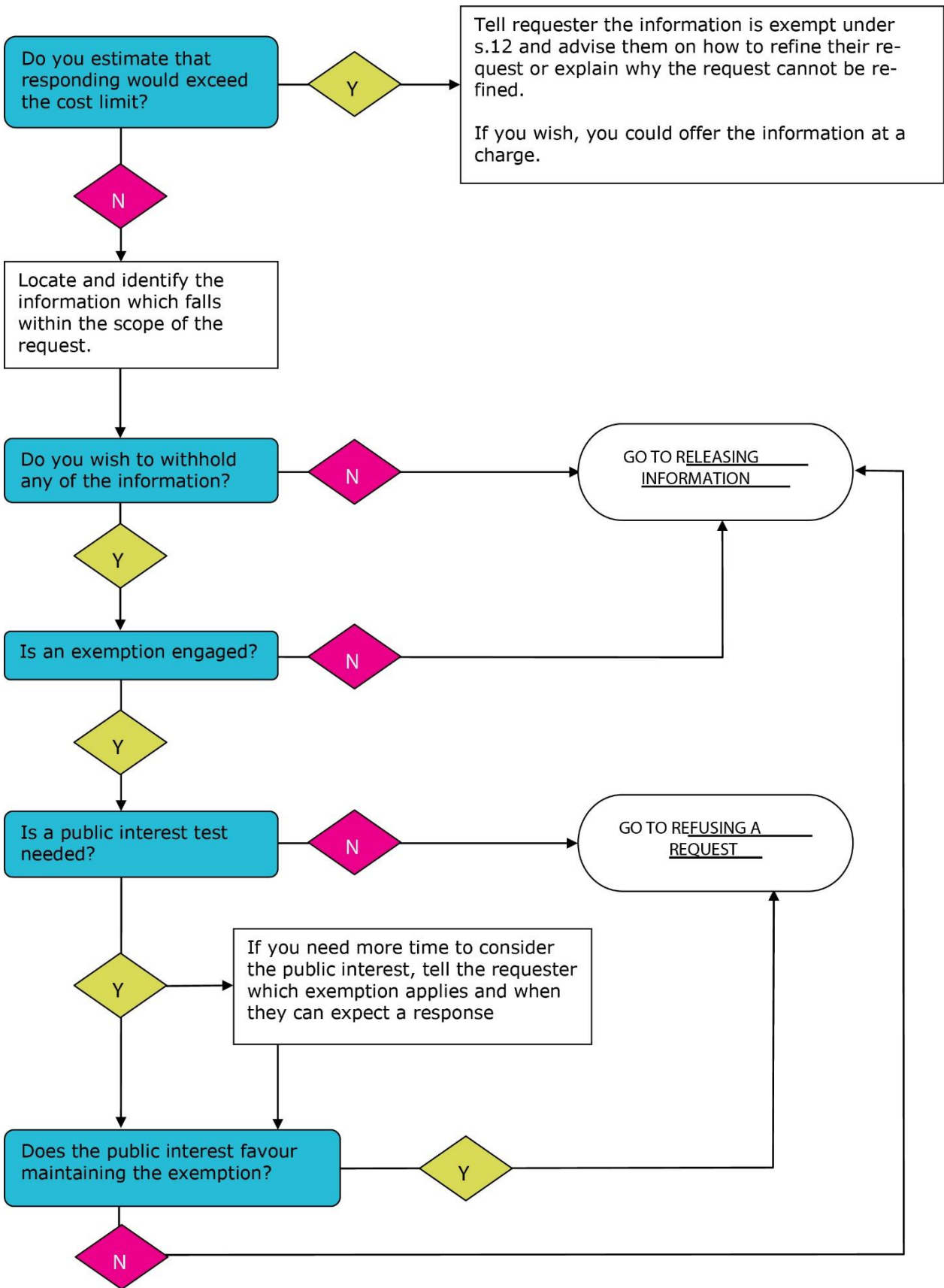
- FOI Procedure;
 - Records Management Policy;
 - Data Protection Act 1998;
 - Fees Regulations;
 - The Freedom of Information (Scotland) Act 2002 ; and
 - Information Commissioner's Office (www.ico.org.uk).
- (I didn't get rid of the bullet above it just keeps doing it!)
- There's a bit missing from the policy template.

Freedom of Information Request Flowchart

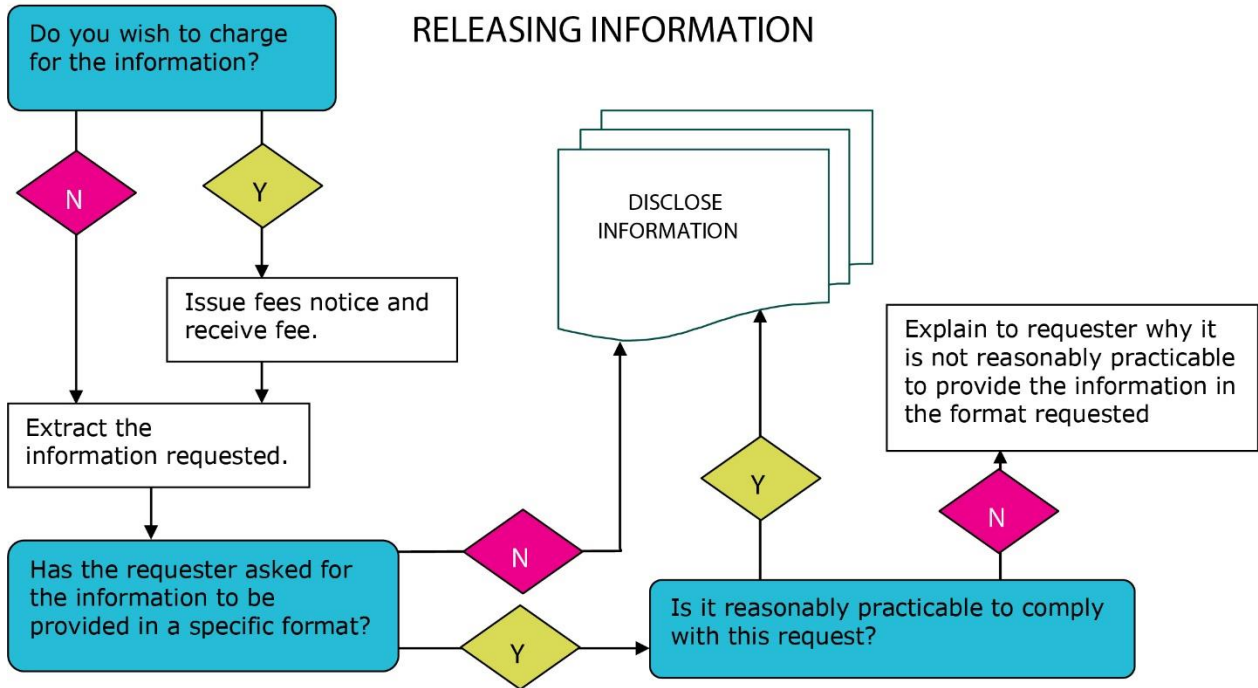
Start here



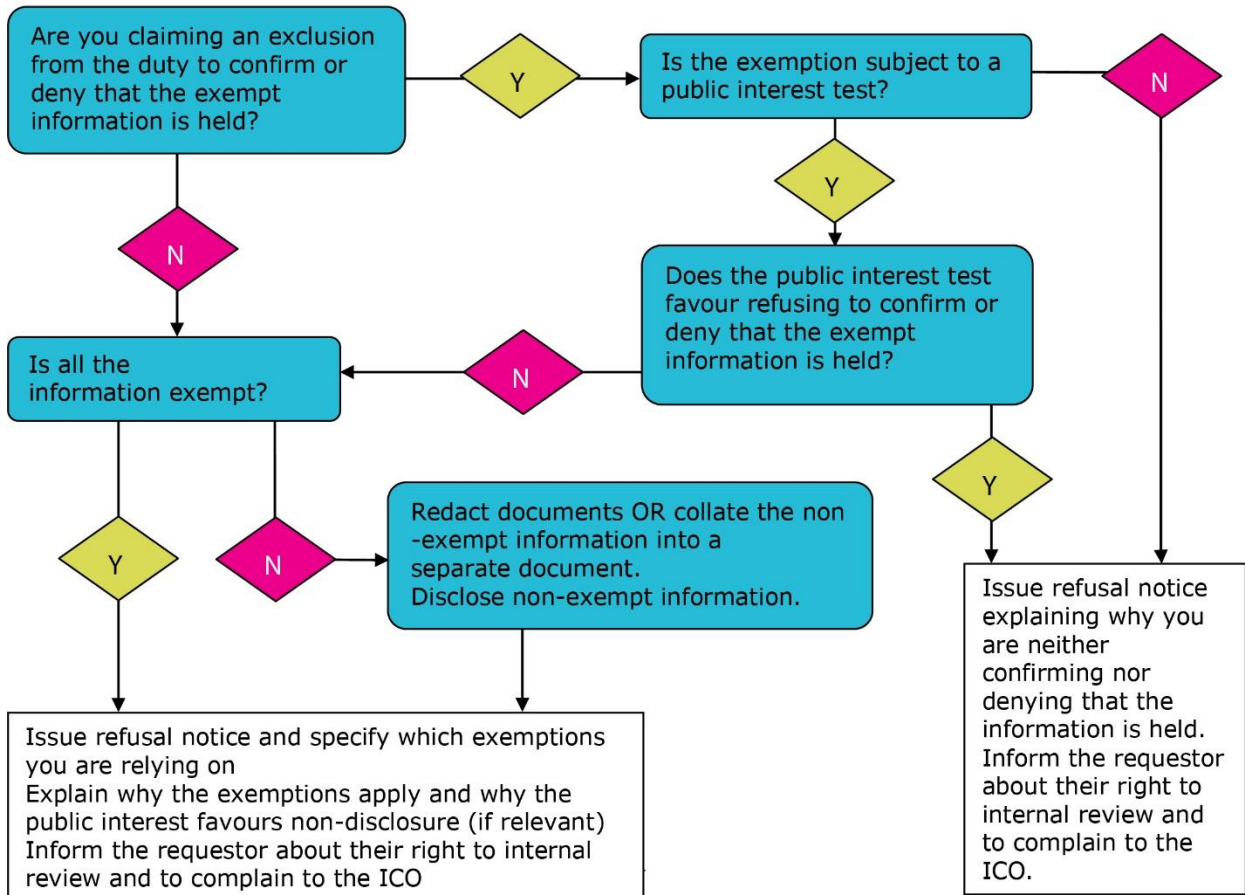




RELEASING INFORMATION



REFUSING A REQUEST



Freedom of Information Act (Scotland) 2002 Publication Scheme

Information relating to each of the headers below can be obtained in FHG's Publication Scheme, which can be accessed on the FHG website.

The Classes of Information are:

- About Us;
- How Key Decisions Are Made;
- Where Our Money Comes From and How It Is Spent;
- How We Provide Services;
- Who We Work With Including Contractors and Our Agreements with them;
- Our Standards – How We Measure and Report Performance; and
- Key Policies.

Freedom of Information Act (Scotland) 2002: Exemptions

For further information about when Freedom of Information requests can be refused, please refer to the guidance available on the Information Commissioner's Office website:

www.ico.org.uk/for_organisations/freedom_of_information/guide/refusing_a_request

Policy on Access to Information

- To make information available to all those who need or request it, wherever possible in the form that is most convenient for them;
- To publicise information already made available by maximising the use of FHG's publication scheme;
- To make access to the publication scheme (and information referred to in it) as easy as possible, particularly through FHG's website;
- To presume that information is available unless FHG can demonstrate a legitimate reason for withholding it; and
- To restrict the scope of information withheld from the public, by interpreting exemptions restrictively, and separating exempt from non-exempt material.

Public Interest Test (PI)

In the majority of cases where an exemption applies to some or all of the information requested, FHG will have to consider whether it must override the exemption because it is in the public interest to release the information.

This public interest test (PI) involves considering the circumstances of each particular case and the exemption that covers the information. The balance will lie in favour of disclosure, in that information may only be withheld if the public interest in withholding it is greater than the public interest in releasing it.

Absolute Exemptions (AE)

However, there are also some exemptions where, if the exemption applies, it is not necessary to go on to consider disclosure in the public interest. These are called the Absolute Exemptions (AE).

Application of Exemptions

The table of exemptions below are listed in order of relevance to FHG, with the more relevant ones being listed first:

Section	The Exemption	Type of Exemption
22	<p>Information intended for future publication Need not be disclosed. This applies where publication was planned at the time the request was made and where it is reasonable that the information is not disclosed until the intended date of publication.</p>	PI
21	<p>Information accessible to the requester by other means This applies where the information requested has already been made available, for example, via FHG's publication</p>	E

Section	The Exemption	Type of Exemption
	scheme or is already available by virtue of other legislation. The information requested must – for this exemption to apply – be reasonably accessible to the requester.	
30	<p>Investigations and proceedings conducted by public authorities</p> <p>This exemption may apply to information held for the purpose of criminal investigations and proceedings, and information obtained from confidential sources relating to these or civil proceedings arising from them.</p>	PI
31	<p>Law enforcement</p> <p>Information not covered by section 3 above, and which may prejudice an investigation and conduct, including prevention of crime, assessment and collection of taxes, regulatory enforcement, health and safety, and any civil proceedings.</p>	PI
32	<p>Court records</p> <p>This exemption covers information that is only held as part of the document for a court or tribunal case or a statutory enquiry.</p>	AE
33	<p>Audit functions</p> <p>This exemption applies to information held by FHG relating to audit or examining the economy, efficiency and effectiveness of the use of resources of other public authorities. Information is exempt if its disclosure is likely to prejudice these functions. It does not cover Internal Audit. The Audit Commission Act 1998 states that no information obtained by an auditor shall be disclosed unless FHG has:</p> <ol style="list-style-type: none"> 1. the consent of the body or person to whom the information relates; 2. for the purposes of any functions of an auditor under this Act; 3. for the purposes of any criminal proceedings <p>A person who discloses information in other circumstances is guilty of an offence and liable to prosecution.</p>	PI
40 (1)	<p>Personal information</p> <p>If an individual makes a request for their own personal data, then this is dealt with under the GDPR (General Data Protection Regulation). Everyone has the right to respect for his private and family life, his home and his correspondence. Therefore in dealing with requests for disclosure of information, the Human Rights Act 1998 Article 8 'right to respect for private and</p>	AE

Section	The Exemption	Type of Exemption
	family life,' will also need to be considered. Will disclosure of information impinge on individuals' right for respect for their private and family life?	
40(2)	<p>Personal information If a third party requests personal information (i.e. not their own personal data) then disclosure is decided in accordance with the GDPR (General Data Protection Regulation), but within the overall framework of FOI. Everyone has the right to respect for their private and family life, their home and correspondence. Therefore in dealing with requests for disclosure of information, the Human Rights Act 1998 Article 8 'right to respect for private and family life,' will also need to be considered. Will disclosure of information impinge on individuals' right for respect for their private and family life?</p>	PI
41	<p>Information provided in confidence This exemption applies where there would be a breach of confidence. FHG should only accept information from third parties in confidence if it is the only way of obtaining the information and the information is needed to carry out any of FHG's functions. FHG must not agree to hold information received from third parties in confidence, which is not confidential in nature. Acceptance of any confidentiality provisions must be for good reason and must be justified to the Information Commissioner, if asked.</p>	AE
42	<p>Legal professional privilege This exemption applies where a claim of legal professional privilege could be maintained in legal proceedings, e.g. correspondence such as legal advice and assistance between FHG's legal services and their client.</p>	PI
43	<p>Commercial interest This exemption applies to trade secrets and to information which, if disclosed, would likely prejudice the commercial interests of any person, including the authority holding it. This exemption is particularly relevant to FHG in the tendering process and the award of contracts negotiated with suppliers.</p> <p>When entering into contracts FHG will refuse to include contractual terms, which purport to restrict the disclosure of information held by FHG and relating to the contract beyond the restrictions permitted by FOI. FHG will not agree to hold information 'in confidence' which is not in fact confidential in nature.</p>	PI

Section	The Exemption	Type of Exemption
	<p>When entering into contracts with non-public authority contractors/service providers, etc., FHG may be under pressure to accept confidentiality clauses so that information relating to the terms of the contract, its value and performance will be exempt from disclosure. FHG will not accept such clauses unless an exemption is provided for under FOI. In any event, the final decision as to whether the exemption applies, will be a decision solely for FHG. FHG may need to protect from disclosure by the contractor/service provider, etc., information which would be exempt from disclosure under FOI by appropriate contractual terms. Apart from such cases, FHG will not impose terms of secrecy on contractors.</p> <p>Appendix A shows FHG's FOI statement which will be used on all tender and contract documents originating from FHG.</p>	
38	<p>Health and safety This exemption applies to any information FHG might disclose that would or would be likely to endanger the physical, mental health or safety of an individual.</p>	PI
39	<p>Environmental information If FHG must disclose environmental information in accordance with the Environmental Information Regulation, then disclosure does not fall under FOI. The release of environmental information is currently subject to the Environmental Information Regulations 1992 (as amended) (EIRs). These will be replaced by revised regulations to be brought into force by 14 February 2005. The effect of the exemption is that release of environmental information must be decided in accordance with these Regulations. It should be noted that the definition of environmental information is broad and will include:</p> <ul style="list-style-type: none"> • State of land (water, air, flora or fauna) • Activities affecting the environment (light, noise, other emissions and nuisances) • Measures designed to protect the environment such as plans, programmes, cost benefit and other economic analyses which relate to environmental information (e.g. roads, traffic, maintenance, land use planning, development control, buildings and estates) <p>While the terms of the regulations align closely with FOI, there are a number of differences, the most relevant of which in the context of the s.43 exemption relates to 'the</p>	PI

Section	The Exemption	Type of Exemption
	confidentiality of commercial and industrial information'. When the request relates to information on emissions into the environment, refusal or the request would be difficult to justify under the regulations.	
44	<p>Legal prohibition</p> <p>This exemption applies where FHG is prohibited in disclosing information by an enactment or the disclosure would constitute a contempt of court (e.g. information relating to investigations and proceedings conducted by FHG). This exemption applies where a claim to legal professional privilege could be maintained in legal proceedings.</p>	AE
	<p>Incomplete request</p> <p>When a requester who has received assistance and prompting from FHG does not give enough of a description of the information that they seek to allow that information to be identified.</p>	ND
	<p>Non-payment of fees</p> <p>When a requester, who has received a fees notice, does not pay the fee within three months.</p>	ND
12	<p>Cost of locating information</p> <p>When the reasonable cost of locating and collating the requested information exceeds the 'appropriate amount'. The 'appropriate amount' is £450.00 and FHG may charge for copying, printing, posting and other disbursements. FOI also allows the aggregation of multiple requests from the same person, or different person appearing to act in concert.</p>	ND
14	<p>Repeated or vexatious requests</p>	ND
26	<p>Defence</p> <p>Information likely to be damaging to national defence or armed forces.</p>	PI
23	<p>Security matters</p> <p>Information relating to security and signed by an MP is proof of exemption.</p>	AE
24	<p>National security</p> <p>Information relating to and needed to safeguard national security and signed by an MP is proof of exemption.</p>	PI

Section	The Exemption	Type of Exemption
27	International relations Information referring to international relations and likely to prejudice the UK's international relations.	PI
28	Relations within the UK Any information likely to prejudice the relations between the national UK administrations.	PI
29	The economy Information likely to damage the interests of the UK economy.	PI
35	Formulation of Government policy Relates to information held by a government department on the formulation of government policy.	PI
36	Prejudice to the effective conduct of public affairs Requires a minister of the crown authority to authorise this exemption. Absolute exemption for information held by either House; public interest test applies for other information.	PI AE
37	Communications with her Majesty This relates to communications with her Majesty and members of the royal household regarding honours.	PI
34	Parliamentary privilege Signed by the Speaker for the House is needed as proof that exemption is justified.	AE

- Those exemptions noted as **PI** indicate that the public interest test must be applied before deciding whether disclosure can take place;
- Those exemptions noted as **AE** indicate that an absolute exemption applies and it is not necessary to consider the public interest in disclosure; and
- Those noted as **ND** indicate a Non-Disclosure and although an exemption does not apply, disclosure by FHG is not necessary for the stated reasons.

Relevant legislation

Other acts of Parliament with provisions regarding the disclosure of information are listed below, although this list is not exhaustive:

- Enterprise Act 2002
- The Audit Commission Act 1998
- Data Protection Act 1998
- GDPR (General Data Protection Regulation)
- Human Rights Act 1998
- Environmental Information Regulations 1992
- Public Works Contracts Regulations 1991
- Public Services Contract Regulations 1993
- Public Supply Contract Regulations 2006

FREEDOM OF INFORMATION (SCOTLAND) ACT 2002: COSTING FORM

In the event that Section 12 “Compliance would exceed cost limit” exemption can be applied, colleagues should complete the enclosed costing form and return to the Chief Executive and Governance Assistant:



FoI Costing Form.xls

Fife Housing Group Publication Framework

For how long will information be published?

We aim, where possible, to publish information for at least the current and previous two financial years from this point onwards. When we review any document – e.g. our policies – to avoid confusion we will only publish the current version once it has been updated.

Information	Where to access
Class 1 - About Fife Housing Group	
1.1 Descriptions of who we are	
Vision & Values	Available on Website
Strategic Objectives	Business Plan
1.2 Location and opening arrangements	
Contact Details & Opening times	Available on Website
1.3 Information relating to Freedom of Information	
Publication Framework	Available on Website
Freedom of Information Policy including: <ul style="list-style-type: none"> • Charging Schedule for Published Information • Details and advice on making an FOI request 	Available on Website
1.4 About our Board	
Board of Management	Available on Website
Governance structure	Available on Website
1.5 About our Colleagues	
Business Leadership Team	Available on Website
Organisational structure	Available on Website
1.6 Policies	
Standing Order & Financial Rules	Policy Section of Website
Membership Policy	Policy Section of Website
Code of Conduct for Employees	Policy Section of Website
Procurement Policy	Policy Section of Website
Safeguarding Policy	Policy Section of Website
ICT Strategy	Policy Section of Website

Governance Expenses Policy	Policy Section of Website
CDM Regulations Policy	Policy Section of Website
Housing Policy	Policy Section of Website
Colleague Handbook	Policy Section of Website
Former Tenant Arrears Policy	Policy Section of Website
Asbestos Policy	Policy Section of Website
Document Retention Policy	Within the GDPR policy
Openness and Confidentiality Policy	Policy Section of Website
Complaints Policy	Policy Section of Website
Legionella Control Policy	Policy Section of Website
Gas Policy	Policy Section of Website
Health and Safety Policy	Policy Section of Website
Rent-setting Policy	Policy Section of Website
GDPR Privacy Policy	Policy Section of Website
Factoring Policy	Policy Section of Website
Repairs and Maintenance Policy	Policy Section of Website
Anti-Fraud Policy	Policy Section of Website
Service Charge Policy	Policy Section of Website
Corporate Social Responsibility Statement	Policy Section of Website
Fixed Asset Policy	Policy Section of Website
Allocations Policy	Policy Section of Website
Anti-Money Laundering Policy	Policy Section of Website
Treasury Management Policy	Policy Section of Website
Tenants' Handbook	Policy Section of Website
1.7 Relationship with Regulators	
Relationship with the Scottish Housing Regulator (SHR)	SHR Website - Landlord Details
Internal and External Audit arrangements	Available on Website
1.8 Group Details	
Details of our parent and subsidiary organisations	Available on Website
Class 2 – How we deliver our functions and services	
2.1 How to use our services	
How to report a repair	Available on Website
How to apply for a house	Available on Website
How to get information about tenancy support	Available on Website
How to make a complaint	Available on Website
How to speak to a housing officer	Available on Website

How we consult with tenants and other customers	Available on Website
Class 3 – How we make decisions	
3.1 Board Meetings	
Board meeting minutes	Available on Website
Board agendas	Available on Website
3.2 Consultation and Participation	
Engagement Strategy	Policy Section of Website
How we engage with tenants	Available on Website
Class 4 – What we spend and how we spend it	
4.1 Information about our accounts and budgets	
Description of funding sources	Available on Website
Audited accounts	Available on Website
Budget policies	Available on request
Budget allocation to key service areas	Available on Website
4.2 Our programme of work and projects	
Brief details of any project funding and how it's being spent	Available on request
Capital works programme/plans information (annual programme figure)	Available on Website
4.3 Spending relating to Colleagues and Board	
Colleague expenses	Colleague Handbook on website
Code of Conduct	Colleague Handbook on website
Board member expenses	Policy Section of Website
General information about colleague pension scheme	Available on Website
Class 5 – How we manage our resources	
5.1 Human Resources	
Human resources policies, covering: • recruitment • performance management • discipline and grievance	Policy Section of Website
Summary of professional organisations	Available on Website
5.2 Information Resources	
Document Retention Policy	Policy Section of Website

Data protection policy	Policy Section of Website
Class 6: How we procure goods and services from external providers	
6.1 Our Contractors and suppliers	
Information about our public contracts	Available on Public Contracts Scotland (PCS)
6.2 Our Procurement	
Procurement Policy	Policy Section of Website
Register of regulated procurement contracts awarded	Available on Public Contracts Scotland (PCS)
Class 7 – How we are performing	
Annual Report	Available on Website
ARC report to tenants	Available on Website
Performance Standards	Annual Report found on SHR Website - Landlord Details
Complaints Policy	Policy Section of Website
Tenant consultation reports	Available on request
Class 8 – Our commercial publications	
This class does not apply to Fife Housing Group as we do not produce any publications for sale.	Not applicable
Class 9 – Our open data	
This class does not apply to Fife Housing Group	Not applicable