

Transparency Policy

May 2018

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Agreed by:	HOST
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1. Our policy is...

- 1.1 To be open with our customers, colleagues and other stakeholders, to show them we operate and use our resources fairly, efficiently and effectively and to present our information in a way which is transparent, accessible and allows for challenge.

2. It applies to...

- 2.1 All areas of the Ongo group.

3. Because we want...

- ✓ People to know we are open and accountable
- ✓ People to feel we are prudent in how we spend our money
- ✓ People to trust us and do business with us
- ✓ Tenants to have the information they need to enable them to play a role in developing our landlord services.

4. We will...

- 4.1 Share information that we are required to do so by law.
- 4.2 Provide complete and timely information to our regulator to assist them in completing their regulatory requirements.
- 4.3 Maintain an honest, open and cooperative relationship with journalists.
- 4.4 Wherever possible, try to respond to requests for information unless there are good reasons why we cannot. In making a decision we will consider:
- ✓ Who will find the information useful
 - ✓ The most appropriate format, tailored to the relevant audience
 - ✓ Value for money, ensuring that the value to the audience justifies the cost and that the way we produce the information is cost effective
 - ✓ Any commercial or individual sensitivities
 - ✓ Any personal or commercial confidentiality issues
 - ✓ Any legal implications
- 4.5 Have regard to the communication needs of the diverse groups and communities we serve when communicating information.
- 4.6 Tell you what information we will routinely share, how and where. This is detailed in Appendix One.

5. Making sure we do what we say...

5.1 The Ongo Partnership Board, in conjunction with the Chief Executive, has overall responsibility for agreeing what information we will routinely share, how and where.

5.2 The Legal and Governance team is responsible for:

- Keeping a record of requests for information from regulators, members of the public and other stakeholders (excluding journalists, which will be recorded by the PR & Marketing team);
- Ensuring that the publication or sharing of information does not infringe the General Data Protection Regulations or any other legislation;
- Ensuring those officers responsible for publishing data in relation to this policy keep the data on the Ongo web site up to date and accurate.

6. Other things to bear in mind...

6.1 Are our policies on:

- ✓ Data protection
- ✓ Media handling

6.2 We have also considered:

- ✓ The Regulator of Social Housing regulatory or contractual requirements to publish standards, performance, value for money and certain expenditure information to customers
- ✓ National Housing Federation's Code of Governance ('Excellence in Governance')
- ✓ For guidance and best practice only, Local Government Transparency Code 2015.

6.3 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 will, however, seek to answer requests for information if asked, providing the information is not 'commercially sensitive' and it would not cost too much nor take up too much staff time to answer the query.

6.4 The Data Protection Act (1998), to be superseded by the General Data Protection Regulations in May 2018, applies to those areas of the Group that are processing data and registered with the Information Commissioner's Office. We have a comprehensive set of policies and procedures to ensure compliance. Data protection constraints may limit the information we can share in some circumstances.

7. We'll look at this again...

7.1 In three years time, or sooner if anything changes.

APPENDIX 1

Item	Details	Recipient/Media
Group and Company annual Financial Statements	Income and expenditure accounts, balance sheet, Internal control and risk assessments, directors' salaries	Regulator, Companies House (not applicable to Ongo Homes), Charities Commission (Ongo Communities only), Financial Conduct Authority (Ongo Homes only), HMRC, Website. Copies on request of Ongo Homes' financial statements to Shareholders at the Ongo Homes Annual General Meeting
Regulatory Returns	Financial forecast returns, annual account returns, quarterly surveys, quarterly and priority notifications of relevant disposals of social housing dwellings including certain financial transactions, statutory notification of relevant constitutional changes including restructures and changes to governing documents, annual report on fraud losses, statistical data return, annual return on Disposal Proceeds Fund.	Regulator
Statement of Compliance with National Housing Federation Code of Governance	Statement of compliance included in annual financial statements, including reasoned statement about any areas of non-compliance	Financial statements
Business plan	Business plan	Regulator, Funders

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Item	Details	Recipient/Media
Audit management letter	Audit management letter	Regulator
Fire risk assessments (high rise buildings)	TO BE DECIDED	TO BE DECIDED
Tenants annual report	Comprehensive statement of activity during the year	Website and by individual request in format of their choice
VFM Self Assessment	Statement required by Regulator	Regulator, Website and by individual request in format of their choice
Tenant Scrutiny Reports	Full reports with recommendations and follow-up reports	Community Voice meetings, Website and by individual request in format of their choice
Tenant attendance at Ongo Homes Board Meetings *	Up to 3 Community Voice members	Physical attendance
Tenant attendance at Ongo Communities Board Meetings *	Up to 3 Community Voice members	Physical attendance
Tenant attendance at Ongo Commercial Board (and any subsidiary board) Meetings	Closed meeting	N/A
Tenant attendance at Ongo Recruitment Board Meetings	Closed meeting	N/A
Tenant attendance at Ongo Home Sales Board	Closed meeting	N/A

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Item	Details	Recipient/Media
meetings		
Tenant attendance at Ongo Developments board meetings	Closed meeting	N/A
Tenant attendance at Ongo Partnership Board Meetings *	Closed meeting	N/A
Minutes of Ongo Homes Board Meetings*		Website and by individual request in format of their choice
Minutes of Ongo Communities Board Meetings *		Website and by individual request in format of their choice
Minutes of Ongo Commercial Board (or any subsidiary board) Meetings	Not to be disclosed	N/A
Minutes of Ongo Recruitment Board Meetings	Not to be disclosed	N/A
Minutes of Ongo Homes Sales Board Meetings	Not to be disclosed	N/A
Minutes of Ongo Developments Board Meetings	Not to be disclosed	N/A
Minutes of Ongo Partnership Board Meetings *		Website and by individual request in format of their choice

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Item	Details	Recipient/Media
Pay and expenses of all Board members	Annual disclosure of amount split between pay and reimbursed expenses	Included in Group financial statements, Website and by individual request in format of their choice
Executive director salaries		Included in Group financial statements
Procurement Ongo Homes	Annual Supplier spend for those above £50,000 pa	Website and by individual request in format of their choice
Procurement Ongo Partnership	Annual Supplier spend for those above £50,000 pa	Website and by individual request in format of their choice
Procurement Ongo Commercial (and subsidiary company)	Not to be disclosed	N/A
Procurement Ongo Communities	Annual Supplier spend for those above £50,000 pa	Website and by individual request in format of their choice
Procurement Ongo Recruitment	Not to be disclosed	N/A
Spend on consultants	Annual supplier spend on consultants grouped by area e.g. Internal Audit, External Audit, Governance, Asset based e.g. Asbestos, ICT related	Website and by individual request in format of their choice

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Item	Details	Recipient/Media
Regulatory Reports	Reports issued by the regulator	Link on Website to Regulation of Social Housing Website
Modern Slavery and Human Trafficking Statement	To be reviewed and published each financial year.	Website and by individual request in format of their choice
Percentage of Invoices paid within 30 days and The amount of interest paid to suppliers due to late payment	After March 2016 this must be published on an annual basis covering the previous 12 months.	Website and by individual request in format of their choice
The total amount of interest liable to pay (whether or not paid and whether under any statutory or other requirement) due to a breach of Regulation 113 of the Public Contracts Regulations 2015	After March 2017, this must be published in addition to the information detailed above.	Website and by individual request in format of their choice
Gender Pay Gap information	Gender pay reporting legislation requires employers with 250 or more employees to publish statutory calculations every year showing how large the pay gap is between their male and female employees. To be reviewed and	Website and by individual request in format of their choice

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Item	Details	Recipient/Media
	published each financial year.	

* open items only i.e. confidential elements, commercially sensitive information or where individuals can be identified to be excluded