

Transparency Policy

December 2021

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<u>Version No.</u>	<u>Purpose/Changes</u>	<u>Approval Date</u>	<u>Approved By</u>	<u>Suggested Review Date</u>
V6.0	Full Review	01/12/2021	Group Common Board	December 2024
V5.0	Compliance check	03/05/2018	Heads of Service	May 2021
V4.0	Compliance check	07/09/2017	Heads of Service	January 2018

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1. Our policy is...

- 1.1 To be transparent means that we are open and honest with our customers, colleagues and other stakeholders.
- 1.2 We will publish information to show that we operate and use our resources fairly, efficiently and effectively and will 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 to...

- Ensure our tenants and customers are confident that we are open and accountable
- Ensure our tenants, colleagues and other stakeholders feel informed and understand how we spend our money
- Ensure people trust us and want to do business with us
- Provide tenants with the information they need to enable them to play a role in developing our landlord services

4. We will...

- 4.1 We will meet our statutory and regulatory requirements completely and in a timely manner.
- 4.2 Information that is published will be shared in a clear and transparent way to enable tenants, colleagues and other stakeholders to scrutinise how we work. This will help us to improve how we do things and enable us to be confident that we are running our business in the right way. All information that is publicised will be accessible to all, taking into account the diversity of all our stakeholders.
- 4.3 In line with our Media Policy, we will always be open, fair, respectful and honest when dealing with requests for information, answering questions and providing news stories; ensuring we maintain an honest, open and cooperative relationship with journalists.
- 4.4 We will respond to requests for information unless there are valid reasons why we cannot. This will be communicated with the person making the request. In making a decision we will consider:
 - Any legal implications
 - Any personal or commercial confidentiality issues
 - Any commercial or individual sensitivities
 - The most appropriate format, tailored to the relevant audience
 - Who will find the information useful
 - Value for money, ensuring that the value to the audience justifies the cost and that the way we produce the information is cost effective
- 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 Group Common Board, following sign-off from the Leadership Team will approve what information is published, how and the frequency of publication, taking into consideration our regulatory and legal obligations.
- 5.2 The PR and Marketing team will keep a record of requests for information from journalists for reporting purposes.
- 5.3 The PR and Marketing team will work with the appropriate teams within the business to ensure all data published on the Ongo website is up to date and accurate.
- 5.4 The Legal team will ensure that the publication and / or sharing of information does not infringe the General Data Protection Regulations or any other legislation and will keep records of such requests from tenants, members of the public and other stakeholders.

6. Other things to bear in mind...

- 6.1 This following internal documents should be considered with this policy:
 - Media Policy
 - Data Protection Policy
- 6.2 We have also considered:
 - ✓ 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
- 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.

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 Group entities 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 (and annual report from 2020)
Business plan		Regulator, Funders

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Item	Details	Recipient/Media
Audit management letter		Regulator
Fire risk assessments (high rise buildings)	Fire Risk Assessments for the High Rise published on the Ongo website	Tenants of the high rise
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 (within statutory accounts) 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 Group Common 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 Meetings	Closed meeting	N/A

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Item	Details	Recipient/Media
Tenant attendance at Ongo Developments board meetings	Closed meeting	N/A
Minutes of Group Common 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 Meetings	Not to be disclosed	N/A
Minutes of Ongo Developments Board Meetings	Not to be disclosed	N/A
Minutes of Audit & Risk Committee	Not to be disclosed	N/A
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

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Procurement Ongo Commercial (and subsidiary companies)	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 (and subsidiary company)	Not to be disclosed	N/A
Procurement Ongo Developments	Not to be disclosed	N/A
Procurement Ongo Home Sales	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
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

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Item	Details	Recipient/Media
<p>Percentage of Invoices paid within 30 days and The amount of interest paid to suppliers due to late payment</p>	<p>After March 2016 this must be published on an annual basis covering the previous 12 months.</p>	<p>Website and by individual request in format of their choice</p>
<p>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</p>	<p>After March 2017, this must be published in addition to the information detailed above.</p>	<p>Website and by individual request in format of their choice</p>
<p>Gender Pay Gap information</p>	<p>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 published each financial year.</p>	<p>Website and by individual request in format of their choice</p>

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