



<b>Policy on :</b>	<b>GROUP COMMUNICATION STRATEGY</b>
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<b>Compliant with Social Housing Charter :</b>	<b>2. Communications</b>
<b>Compliant with Tenant Participation Strategy :</b>	<b>Yes</b>
<b>Compliant with Equality &amp; Diversity :</b>	<b>Yes</b>
<b>Compliant with Business Plan:</b>	<b>Yes</b>

<b>Date of Approval:</b>	<b>August 2019</b>
<b>Date for Review:</b>	<b>August 2022</b>

<b>Responsible Officer :</b>	<b>Corporate Services Manager</b>
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## **Section 1 - Context**

1.1 Our Group communications strategy has been developed to ensure that all internal and external communication and feedback is effective, meaningful and relevant and provides a successful mechanism for two way communication. Our Strategy sets out the ways in which we will communicate and feedback to our customers. It identifies the standards and methods we will use to provide information, the types of information we will provide and how we will provide feedback. Good communication and feedback is the responsibility of all staff and will meet the standards outlined in this document.

1.2 Communications can be verbal or non-verbal, formal or informal. Our aim is to ensure that customers and staff of Barrhead Housing Association (BHA) and Lavern Property Services (LPS) have a wide range of opportunities to provide and receive information relating to matters which affect them.

1.3 The strategy aims to allow for information about Barrhead Housing Group [BHG] (BHA & LPS) to be open and accessible.

## **Section 2 - The Law and Good Practice**

2.1 Equality Act 2010 - The Equality Act 2010 bans unfair treatment and helps achieve equal opportunities in the workplace and in wider society.

2.2 Housing Scotland Act 2001

The Housing (Scotland) Act 2001 created a legal framework for tenants who have a Scottish secure tenancy or short Scottish secure tenancy to take part in the way their housing is managed. Landlords must develop a tenant participation strategy and put it into practice. Landlords must also support and consult with Registered Tenant Organisations (RTO's) and hold a register of these organisations.

2.3 The Housing (Scotland) Act 2010 - Scottish Social Housing Charter

The Charter was introduced by the Scottish Government in 2012 as a tool to enable tenants to monitor the standards and the performance of the services that their landlord provides. It is also used by the Scottish Housing Regulator (SHR) to monitor the performance of Registered Social Landlords, like Barrhead Housing Association.

2.4 The Data Protection Act 2018 governs the protection of personal data in the UK and sits alongside the GDPR. The GDPR is the General Data Protection Regulation (EU) 2016/679 and sets out the key principles, rights and obligations for most processing of personal data.

2.5 The Freedom of Information (Scotland) Act 2002 and Environmental Information (Scotland) Regulations 2004 give people the right to ask for, and be given, information from Scottish public bodies. From November 2019, this legislation extends to cover Housing Associations like Barrhead Housing Association. Subsidiary bodies like Lavern Property Services are also covered by FOI, but only in relation to those services related to the management of SST's and sSST's.

2.6. Barrhead Housing Group has developed a Publication Scheme and associated Guide to information which reflect good practice and which seek to maximise the information which we make publicly available.

2.7 We will ensure that this publication scheme remains relevant and up to date, and we will ensure that we respond to FOI/EIR requests within both the spirit and terms and of the legislation / regulations and any existing or new Codes of Practice.

### **Section 3 Our Communication Strategy Objectives**

3.1 This strategy aims to set out the framework and standards on: -

- How customers can provide feedback on our services
- How we will communicate with customers
- How we will respond to customers
- What we will do with feedback received
- How we communicate with staff
- How we respond to feedback from staff.

3.2 We aim to conduct our affairs in an open and transparent manner and make information publicly available, unless there are justifiable reasons for not providing it. We will comply with the terms of the Freedom of Information legislation (from 11<sup>th</sup> November 2019), and will publicise information in accordance with our Publication framework.

3.3 We will provide opportunities for our stakeholders to be involved in or to influence the decision making process. Our key stakeholders will be our tenants, our owners, our applicants and service users, our members, and our staff.

3.4 We will seek to adopt best practice and achieve equality for all and value for money.

### **Section 4 Implementing Our Objectives**

#### **4.1 How Customers Can Provide Feedback on Our Services**

4.1.1 We aim to provide a range of flexible options which give customers choice and opportunities to provide feedback to us.

In addition to our Governing Body, LPS and sub-group arrangements, we also have a Tenant Scrutiny Panel, where tenant members help us to improve our overall services by:

- Acting as a critical friend
- Acting as a voice for other tenants
- Being tenant led and independent
- Our Owner's Forum for our Subsidiary, Levern Property Services

4.1.2 In addition, there are other ways to provide feedback, such as:

- Taking part in surveys or consultation by post, email, Web, in person or via the telephone
- Attending meetings, conferences and seminars
- Open days/ gala and fun days/ wider community events/ road shows
- Becoming a member of BHA
- Or simply by contacting us with any concerns, suggestions or ideas regarding our services here:

[https://www.barrheadha.org/suggestion or complaint/](https://www.barrheadha.org/suggestion%20or%20complaint/)

## **4.2 How We Will Communicate With Customers**

4.2.1 We will use a wide variety of methods to communicate information to customers including: -

- Letters and emails
- Telephone calls and texts
- A quarterly Tenants newsletter
- 6 monthly LPS newsletter
- An Annual General Meeting and Financial Report
- Our Annual Performance Report on the Charter
- Our annual governance Assurance Report (from October 2019)
- Via our website, Facebook, Twitter and social media
- Face to face contact
- Our staff attending local meetings
- Press releases
- Leaflets and posters at the BHA /LPS office

4.2.2 Our written communications can be made available in a range of formats including large print, alternative language and braille.

4.2.3 We will use plain English or provide explanations of any necessary jargon used in our communications.

4.2.4 Though our membership of "Happy to Translate", we can provide translation support to those customers where English is not their first language.

### **4.3 How We Will Respond to Customers**

4.3.1 We aim to respond to customer enquiries by their preferred communication method e.g. letter, email, telephone, through a third party (where authorised to do so) or in person

4.3.2 We will answer telephone calls promptly, identify ourselves and will call back within 24 hours if we cannot answer the enquiry immediately or if the member of staff you wish to speak to is not available.

4.3.3 We will aim to respond to all written and email communications within 5 working days, and to write to customers again if it will take longer to investigate more complex enquiries.

4.3.4 Full information on the standards of service customers can expect are detailed within our Customer Care Standards document (See Appendix 1)

### **4.4 What Will We Do With Feedback Received?**

4.4.1 Feedback from consultation and reviews is, firstly, used to assist the Senior Management Team and, ultimately the Boards to make informed decisions about any changes in the way that we deliver services. All comments received remain confidential.

4.4.2 Periodically, we will publish feedback to our customers on what changes we have made or are considering as a direct result of feedback received. We will use a variety of ways to ensure that as many customers as possible have access to feedback from BHG e.g. newsletters, performance report, website etc.

4.4.3 We will publish minutes of our BHA and LPS Board on our website in accordance with our Publication Scheme. This gives our customers the opportunity to understand our decision making process.

## **Section 5 Performance Management**

5.1 We have developed a performance framework to ensure that targets are measured. Our performance is reported in our Landlord Report and our Performance Report on the charter, which is published each year. A copy of the Landlord and Performance Reports is also available on our website <https://www.barrheadha.org/downloads/> , and is available on request from our offices.

5.2 We will provide information on our performance via various newsletters and our annual report on the Social Housing Charter issued to our customers and staff.

5.3 Performance against indicators are reported to our Boards and staff are updated on current performance at our regular staff meetings.

### **5.5 Scottish Social Housing Charter**

5.5.1 The purpose of the Charter is to help improve the quality and value of the services that social landlords deliver to their tenants and other customers. It provides tenants and

other customers with a clear statement of what can be expected from us. It focuses our efforts on achieving the outcomes that matter to our tenants and other customers.

5.5.2 The Charter provides the basis for the Scottish Housing Regulator to assess and report on how well we are performing. This allows the Scottish Housing Regulator, our tenants and other customers to identify areas of strong performance and where improvement is needed.

5.5.3 Our annual Performance report on the Charter provides more details on our performance throughout the year, against the Scottish average, against our local partners and against our performance trends. It will provide more information on where performance needs to improve.

5.5.4 Our annual Performance Report is consulted on via the Tenant Scrutiny Panel and all customers are invited to provide feedback on this report at any time.

## **Section 6 Training and Awareness**

6.1 This Communication Strategy will be reviewed on a 3 yearly basis and circulated to all employees. Any necessary training will be arranged for employees.

## **Section 7 Tenant Participation**

### 7.1 Tenant Participation Strategy

7.1.1 As part of our planned work for 2019, we will be developing a new Tenant Participation Strategy. This Strategy will support us to:

- Review opportunities for tenant participation and involvement
- Raise awareness of Tenant Participation
- Remove barriers that may prevent people from getting involved

7.2 We have a Tenants Handbook and a selection of general information leaflets available from our website or from our offices.

7.3 Comprehensive Tenant Satisfaction Surveys are undertaken on a 3 yearly cycle, with the next one due in 2019/20. There are also a number of periodic mechanisms for seeking tenant's views across many of our activities including repairs, rent charges, allocations etc

### 7.4 Newspapers, Radio, Professional Journals and Other Media

7.4.1 Our senior staff are experienced in dealing with the media and the Chief Executive, SMT and Corporate Services Manager will deal with all BHA media enquiries. Any requests for formal information will be dealt with via our Freedom of Information Policy & Procedure.

7.4.2 Press releases are issued regularly by us to the local press and professional journals keeping them informed of our successes and news stories.

7.4.3 A good relationship with the local press is essential, and will continue to be developed.

7.5 The Report of the Governing Board and Financial Statements are published on BHA's website following a report by our external auditors to our members at each year's AGM.

**7.6** Our landlord report is published by the Scottish Housing Regulator each year and is available on our website as well as the Regulator's website. It provides some key performance data against the Scottish average. We produce an annual value for money statement each September for BHA outlining what we believe to be important information on how we demonstrate that we regularly review our costs and services, making sure we tender to obtain best value and quality of services delivered. These reports are available electronically on the website and in paper format where requested.

7.7 The dates and venue for our Annual General Meeting (AGM) are published in our tenant's newsletters, on our website and all members are sent invitations. We normally hold our AGM in the local area and ensure that the venues are accessible to the needs of our members. A report on the AGM will feature in the tenants' newsletter and a press release will be issued prior to and following the meeting.

7.8 We continue to use social networking as a form of customer contact and feedback. The advantages of this form of communication is that it provides an efficient, effective and cost effective way of engaging on-line and give BHG a broader reach beyond traditional communication methods. This includes Facebook and twitter. We will also respond to negative comments and provide more detailed information where appropriate or invite customers to speak directly to staff where the issues are perhaps more serious or sensitive.

## **Section 8 Dealing with Complaints**

8.1 The BHA Governing Board receives a report on the outcomes and actions taken in dealing with complaints. Statistical information on our complaints is published in our Annual Performance Report and is part of our Social Housing Charter statistical return.

8.2 in relation to LPS complaints, we are developing arrangements to prepare an annual report to the LPS Board. We will also provide trend information to the Owner's forum and discuss any general matters arising from our handling of complaints and how we might use this information to improve service delivery

8.2 We have implemented a Complaints Handling Policy and Procedure which has been based on model documentation from the Scottish Ombudsman and approved by the BHA Governing Board on behalf of the Barrhead Housing Group. We will provide our staff with regular complaints training, the most recent being April 2019.

8.3 Our complaints handling procedure reflects our commitment to valuing complaints. It seeks to resolve customer dissatisfaction as quickly as possible at the first point of contact.

Impartial and fair investigations of complaints are undertaken so that, where appropriate, we can make evidence-based decisions on the facts of the case.

8.4 Working with tenants or other members of the community who have complaints is extremely important to us. One of the aims of the Complaints Handling Procedure is to identify opportunities to improve our services.

8.5 A copy of the Complaints Handling procedure leaflet is available at all of our offices and on our websites.

8.6 Complaints can be made in person at our offices, by telephone, in writing, by email or by using our complaint form available on our website.

## **Section 9 Consultation and Review Procedures**

9.1 Our stakeholders for the purposes of this strategy are people or organisations with a direct involvement or interest in our operation or performance, including:

- Tenants
- Owners
- Applicants, or anyone who receives a service from us
- Our staff.

9.2 Tenants, service users, customers, staff employees and BHA Governing Board will be informed of all major decisions via face to face meetings, Workplace, Tenants Newsletters, press releases, Website updates, staff newsletters, updates, team meetings and Tenant Scrutiny Panel as appropriate.

## **Section 10 Confidentiality and Data Protection**

### **10.1 Confidentiality**

10.1.1 All employees, and members of our Governing Boards are required to respect our Confidentiality and Data Protection Guidance and annually sign up to our approved Code of Conduct. The Code of Conduct outlines the behaviours we expect staff and Board members to abide by and it is also used to ensure the highest standards of probity and honesty, transparency and accountability. Where conflicts of interest are required to be registered, this is completed annually.

### **10.2 General**

10.2.1 Information gained through involvement with us should be treated as confidential and should not be disclosed, for example:

- Commercially sensitive information;
- Information that concerns an individual customer;



- Information that concerns staff members (for example, employment details, remuneration, health etc.);
- Information which may have long-term legal implications or contain legal advice;
- Tender information and contracts;

10.2.2 Information such as that described may be covered by confidentiality agreements within contractual terms and conditions as well as statutory provisions which prevent its disclosure or third party use.

10.2.3 The general rule that should be adopted is a position of non-disclosure, unless required by FOI/EIR (and not exempt from publication).

### **10.3 Data Protection**

10.3.1 GDPR and the Data Protection Act is a complex landscape and sets out principles which we must comply with when obtaining, keeping or processing any personal information. The Act only covers information which is classified as personal data and does not cover property or any other aspect of BHA.

10.3.2 We have a separate policies which cover data protection and how we process the personal data we hold.

**Appendix 1**

**SERVICE STANDARDS POLICY**

<b>Compliant with Social Housing Charter :</b>	<b>2. Communications</b>
<b>Compliant with Tenant Participation Strategy :</b>	<b>Yes</b>
<b>Compliant with Equality &amp; Diversity :</b>	<b>Yes</b>
<b>Compliant with Business Plan:</b>	<b>Policy review timescales. Affects all service delivery areas.</b>

<b>Date of Approval:</b>	<b>September 2018</b>
<b>Date for Review:</b>	<b>September 2020</b>

<b>Responsible Officer :</b>	<b>Director of Customer Services</b>
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## **1. INTRODUCTION**

This policy sets out the standards of service our service users can expect to receive from us.

## **2. DEFINITION OF 'SERVICE USERS'**

Our service users include: tenants, owner occupiers in a factored property, sharing owners, housing applicants and any other individual or groups of individuals who seek or receive a service from us.

## **3. DEFINITION OF 'SERVICE STANDARDS'**

Service Standards confirm how specific services will be delivered and explain to users the quality of service they can expect.

Service Standards are service commitments by Barrhead Housing Association service users. They confirm how specific services will be delivered and explain to users the quality of service they can expect. We recognise the way we provide our services can be as important as the service itself.

## **4. AREAS OF WORK COVERED BY SERVICE STANDARDS**

We have in place service standards to cover both general and specific parts of our work. Each department has listed key service areas and attached standards to them. These range from the timescales for responding to queries to how staff will deliver a particular service. Our Service Standards of Service (appendix 1) provides full details what you can expect from us.

## **5. HOW WILL WE MONITOR OUR PERFORMANCE?**

We will review these standards on a three-yearly basis with our service users and report our performance on achieving the standards to our Governing Board on an annual basis.

Where we have not met our standards of service we will take steps to ensure the same issue does not arise again by reviewing service delivery, policy and practice.

## **6. EQUALITY & DIVERSITY**

Barrhead Housing Association is committed to providing fair and equal treatment to all our customers and to comply with the Equality Act 2010. The Act established 9 protected characteristics (the grounds on which discrimination is unlawful). These cover age, race, sex, religion/belief, sexual orientation, pregnancy/maternity, gender reassignment, disability and marriage/civil partnership.

We will offer customers a range of options for communicating with us, since requiring to contact us may have to be in writing and this may be a deterrent, for example for people with poor literacy skills, visual impairment, or where first language is not English.

## **7. GENERAL DATA PROTECTION REGULATIONS**

The Association will treat all personal data in line with our obligations under the current General Data Protection Regulations and our own Data Protection Policy Statement, Privacy Policy and Data Retention Policy.

Information regarding how your data will be used and the basis for processing your data is provided within our employee and resident Fair Processing Notices.

## Our Targets for Responding to Different Communication Methods

**When you visit our office we aim to:**

Acknowledge you when you arrive, and attend to you as quickly as possible.

Ensure that, if you have made an appointment with a member of staff, you will be seen on time.

Deal with your enquiry, even if you visit our office without an appointment

Arrange an appointment with the relevant member of staff if they are not available when you call in; and

Talk to you in a private interview room when one available

**When you communicate with us in writing, including by email, we aim to:**

Respond to you within 5 working days We will write to you again in the event that we require further time to carry out more detailed investigations

When a staff member is out of the office, their email message will provide details of who to contact in their absence

**When you telephone us, we aim to:**

Answer all telephone calls promptly

Answer with the greeting "Good morning/afternoon, Barrhead Housing Association, <name of staff member> speaking, how can I help you?"

Deal with all enquiries immediately without the need to pass on to another member of staff

Ensure that, when offices are closed, an appropriate answerphone or message service will be in operation.

Ensure that, if the person you wish to speak to is not available and you would rather not wait for them, you are passed to another staff member who will endeavour to deal with our enquiry.

Respond to any messages left on our voice mail within one working day (if we have not redirected our calls).

**When you make an enquiry via our website, we aim to:**

Respond to your email within 5 working days.

We will write to you again in the event that we require further time to carry out more detailed investigations

## Complaints:

### Introduction:

We have 2 internal stages of complaints which we aim to respond to within the Scottish Public Services Ombudsman (SPSO) Model Complaint Handling Procedure (CHP) timescales.

There are 2 stages to our Complaints processes. These are:

#### Stage 1: Frontline Complaint

Complaints that can be resolved quickly

#### Stage 2: Investigation Complaint

Those complaints that have not been resolved at stage 1 or are complex and require more detailed investigation.

### In relation to Complaints we will always:

- Make an information leaflet on our complaints policy readily available from our office and on our website.
- Investigate fully all complaints made by service users about our services, and use our findings to improve our services to you.
- Ensure that you are able to submit a complaint in a variety of ways, including directly via our website
- Deal with complaints promptly, courteously, systematically, fairly and in confidence
- Ask you how you would like the complaint to be resolved

## General:

### When dealing with the public we will always:

Introduce ourselves by name and show you our Staff ID badge whenever we meet with you outside our offices

### When we are not in the office we will always:

Ensure that our telephone and email messages provide details of who to contact in our absence

### When you make a complaint we aim to:

- Respond to Stage 1 complaints within 5 working days
- Respond to Stage 2 complaints within 20 working days

### If you are not happy with our response we will always:

Provide you with details of how to take your complaint to the Scottish Public Services Ombudsman (SPSO)

### Housing Applications & Allocation of Property

**When you apply for a house or request a transfer we aim to:**

Offer assistance, or an appointment, to complete your application form.

Process your completed application form within 15 working days.

Ensure that all information provided to us by you will remain confidential and only used for the purposes intended, in accordance with our fair processing notices

Allocate available property fairly according to our Allocation Policy (a copy of which is available on request).

### Your Rent

**For rent Payments, we will aim to:**

Offer a variety of easy methods of rent payment.

Offer advice and assistance in completing Housing Benefit & Universal Credit online application or, where necessary, provide full details of local agencies that provide digital facilities.

Credit all payments to tenant accounts within two working days.

Cover the costs of, and help you set up, a Pioneer Credit Union Account to have Universal Credit housing payments made direct to your rent account.

**When you are having difficulty paying your rent, we will aim to:**

Make practical and realistic arrangements for repayment of your arrears based on your circumstances.

Offer to refer you to our Welfare Rights Officer to ensure that you receive appropriate advice on welfare benefits advice.

## Factoring Service

**If you are an owner (or sharing owner) and receive our factoring service we aim to:**

Issue you with an account giving details of charges 4 times during the year.

Offer you a variety of easy payment options including regular monthly payments.

Provide you with a 'Written Statement of Service' within 4 weeks of us being made aware of a change of ownership in a property we manage.

Post inspect all common repairs over £500

Process all factoring payments within 5 working days of receipt of payment into our bank account.

Carry out an annual inspection of your building every year

Carry out an owners satisfaction survey every 3 years covering 40% of our customers

Invite you to participate in our owners forum

Issue a newsletter twice yearly

Ensure that our website contains a range of helpful and up to date information

## Alterations & Improvements

**If you are a tenant and want to alter or improve your home, we aim to:**

Not unreasonably withhold permission for requests to alter or improve a property.

Compensate you for certain improvements at the end of the tenancy, provided we had agreed to them being carried out.

Ensure that any application for an improvement or alteration is responded to within 20 working days

## Estate Management

**We aim to:**

Undertake regular internal and external checks of the area as appropriate.

In accordance with our Estate Management Policy timescales, instruct the removal or safe storage of any items within our closes/common areas that pose a fire/health and safety risk to our residents

## Neighbour Disputes & Anti-Social Behaviour Complaints

**When you make a complaint about anti-social behaviour we aim to:**

Allow you to make a complaint in a variety of ways - through letter, email or via our website

Visit you (or contact you by phone) within the timescales contained within our anti social behaviour policy

Provide you with a copy of our policy on request

Make contact with you during ongoing complaints by phone or email, as appropriate

Make clear to all tenants that any form of harassment of a neighbour will be viewed as a serious breach of the Tenancy Agreement.



**Our Planned Maintenance Services**

**When carrying out the renewal of major items in your home we aim to:**

Ensure that detail of planned programmes of work are detailed in our quarterly newsletters and in the “news” section of our website

Where there are options or choices to be made, carry out appropriate consultation with affected customers

Provide you, at least 2 weeks prior to work commencing, with detail of the contractor, works required, and access necessary and any additional requirements related to the works.

Offer to visit you with the Contractor if this is necessary.

Inspect all works carried out once completed, and take up any issues with the Contractor

Issue a tenant satisfaction survey within three months of completion of the works.

**When carrying out servicing and cyclical works we aim to:**

Give you as much notice as possible of works commencing

Where appropriate, inspect works once completed

## Repairs Service

**When you report a repair we aim to:**

Attend Emergency Repairs within 2 hours and make safe 4 hours.

Attend non-emergency urgent repairs within 2 working days.

Attend non-emergency routine repairs within 7 working days

Respond to Appointment Repairs within an agreed date/ time slot, and attend during this agreed time.

Ensure for non-emergency repairs that the Contractor attends within the appointment (date and time) slot agreed with you.

Inspect a sample of completed jobs to check for quality

Ask you to complete a customer satisfaction survey on completion of your repair.

## General Information

**Newsletters we will:**

Issue 4 newsletters to residents each year.

**Website we will:**

Post regular news information on our website when it happens.

Update the website regularly

**Happy to Translate we will:**

Display the logo and use the tools provided to help identify a service user's language. We will make effective and efficient use of language service provision through professional language companies.

**Staff Training:**

We will provide regular staff training to ensure a consistency of approach in delivering our service standards

**Consultation & Review we will:**

Provide you with opportunities to become involved in shaping and monitoring our services in a range of ways to suit your needs and lifestyle.

Consult with you on changes to services which might affect you.

Carry out regular surveys to find out your views on our services

Learn from your feedback and make positive changes based on feedback received

Publish an annual report to tell you how we are doing, and also an annual Value for Money Statement.

**General Data Protection Regulations. We will:**

Issue all applicants with a Fair Processing Notice when they obtain a housing application form from us

Ensure that your data is managed in accordance with our General Data Protection Policy and Policy Statement

Remove any data from our systems in accordance with the relevant timescales within our Data Retention Policy.

