



CUNNINGHAME
HOUSING ASSOCIATION

*Making Our Communities Better Places
More Than Just A Landlord*

GUIDE TO INFORMATION



Cunninghame Housing Association Guide to Information

Last Reviewed: November 2019

At a glance – terms used in this document

Term Used	Explanation
FOISA	<p>Freedom of Information (Scotland) Act 2002</p> <p><i>Places a duty on those organisations covered to proactively publish certain types of information; and to respond to requests for information; and to provide advice and assistance to those making requests for information.</i></p>
EIRs	<p>Environmental Information Regulations (Scotland) 2004</p> <p><i>Those organisations covered by EIRs have a duty to respond to requests for environmental information</i></p>
SIC	<p>The Scottish Information Commissioner</p> <p><i>Who is responsible for ensuring that those bodies covered by FOISA and EIRs comply with the terms of the legislation.</i></p>
MPS	<p>Model Publication Scheme</p> <p><i>Produced by the SIC – this details all of the information that those subject to FOISA should publish (if they hold it)</i></p>
Guide to Information	<p><i>A guide that all organisations subject to FOISA and adopting the MPS must produce to help people access the information it makes available</i></p>
Classes of Information	<p><i>Nine broad categories describing the types of information authorities should publish (if they hold it).</i></p>

Background

The Freedom of Information (Scotland) Act 2002 (FOISA) requires that all housing associations/co-operatives in Scotland must produce and maintain a publication scheme. This must detail all of the key information that we publish and how you can access it. This Guide to Information is our publication scheme, and contains links to where you can find all of the information listed online.

Cunninghame Housing Association is subject to both FOISA and Environmental Information Regulations (EIR) by virtue of the: Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019 (the “Order”).

The Order came into effect on 11 November 2019 and brought all Registered Social Landlords (“RSLs”) and certain RSL subsidiaries under the scope of FOISA and the EIR.

What is subject to FOISA and EIR?

However, in accordance with the terms of the Order, not everything that Cunninghame Housing Association does is subject to FOISA and EIR. Instead, Cunninghame Housing Association is only subject to these regimes in respect of certain functions, namely ‘housing services’ (as defined in s.165 of the Housing (Scotland) Act 2010) which Cunninghame Housing Association carries out – subject to some restrictions. Looking at the definition of ‘housing services’ and the restrictions which are set out in the Order the following functions carried out by Cunninghame Housing Association are covered by FOISA and EIR:

- the prevention and alleviation of homelessness
- the management of social housing accommodation
- the provision and management of sites for gypsies and travellers¹; and
- the supply of information to the Scottish Housing Regulator (SHR) by an RSL or a connected body (i.e. a subsidiary) in relation to its financial wellbeing and standards of governance.

What is the difference between FOISA and EIR?

EIR provides a right of access to ‘Environmental Information’ held by Cunninghame Housing Association. Environmental Information has a very wide definition which is set out in Regulations. Where a request under FOISA is received for Environmental Information it should be processed in accordance with EIR.

Whilst the obligation under FOISA and EIR are similar – there are some key differences that employees must be aware of when dealing with requests for information. Further guidance on the differences are available on SIC’s website.

Cunninghame Housing Association has adopted the Scottish Information Commissioner’s (SIC) [Model Publication Scheme \(MPS\)](#), and this Guide has been approved by the SIC.

¹ Gypsies and travellers not applicable to Cunninghame Housing Association.

Formats other than online

All of the information listed is available on our website (unless stated), and completely free to access online. However, we understand that not everyone will have online access and where this is the case you can contact us to view this in our office (where this would be convenient).

If you would like a printed copy of any of the information listed, unfortunately we may have to charge a small fee to provide this. This fee will never exceed the cost of photocopying and postage – and we will let you know any total cost before we forward this to you.

Our charges for providing any information detailed in this guide are summarised below:

Format	Charge
Online	Free
View at our office	Free
Print in black and white	10p per A4 sheet 20p per A3 sheet
Print in colour	20p per A4 sheet 40p per A3 sheet
CD Rom	50p per CD Rom
Posted document/CD Rom	Cost of postage incurred

Charges for Environmental Information Environmental information is provided under the EIRs rather than FOISA.

The rules for charging for environmental information are slightly different.

You can access The Guide to the Environmental Information Regulations from the [Information Commissioners Office](#).

We do not charge for the time to determine whether we hold the environmental information requested or deciding whether the information can be released. Charges may be made for locating, retrieving and providing information to you e.g. photocopying and postage.

If we decide to impose a charge, we will issue you with notification of the charge and how it has been calculated. The information will be provided to you on payment of the charge. If you decide not to proceed with the request there will be no charge to you. Charges are calculated based on the actual cost to Cunninghame Housing Association of providing the information:

- Photocopying is charged at 10p per A4 sheet for black and white copying, 20p per A4 sheet for colour copying.
- Postage is charged at actual rate for Royal Mail First Class.
- Staff time is calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour.

The first £100 worth of information will be provided to you without charge.

Where information costs between £100 and £600 to provide, you will be asked to pay 10% of the cost. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50, calculated on the basis of a waiver for the first £100 and 10% of the remaining £500.

Where it would cost more than £600 to provide the information to you, however, we will ask you to pay the full cost of providing the information, with no waiver for any portion of the cost.

Charges for requesting for your own personal data

There is no charge for requesting your own personal data under the General Data Protection Regulation (GDPR) Subject Access Request. We must provide a copy of the information free of charge.

However, we can charge a 'reasonable fee' when a request is manifestly unfounded or excessive, particularly if it is repetitive. We may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we can charge for all subsequent access requests. The fee must be based on the administrative cost of providing the information.

When providing copies of pre-printed publications, we will charge no more than the cost per copy of the total print run.

We do not pass on any other costs to you in relation to our published information.

Charges for information which is not available under the scheme:

If you submit a request to us for information which is not available in this Guide the charges will be based on the following calculations:

General information requests

- There will be no charge for information requests which cost us £100 or less to process
- Where information costs between £100 and £600 to provide you may be asked to pay 10% of the cost. That is, if you were to ask for information that cost us £600 to provide, you would be asked to pay £50 calculated on the basis of a waiver for the first £100 and 10% of the remaining £500
- We are not obliged to respond to requests which will cost us over £600 to process
- In calculating any fee, staff time will be calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour
- We do not charge for the time to determine whether we hold the information requested, nor for the time it takes to decide whether the information can be released. Charges may be made for locating, retrieving and providing information to you
- In the event that we decide to impose a charge we will issue you with notification of the charge (a fees notice) and how it has been calculated. You will have three months from the date of issue of the fees notice in which to decide whether to pay

the charge. The information will be provided to you on payment of the charge. If you decide not to proceed with the request there will be no charge to you.

If you would like to request information that we publish in a format other than online, or arrange a visit to our office to view information, please contact: Joanna Thomson, Administration Officer by email foi@chaltld.org or telephone 01294 606040.

Information that we cannot publish

Whilst we will try to make all of the information we have detailed available, in rare cases there may be some information that we cannot make available. For example, sometimes if we were to publish certain Board of Management minutes, it could reveal personal details about an individual. This would be a breach of Data Protection legislation if we were to do so. When this is the case, we will remove any personal details before publication and highlight where and why we have done so.

For how long will information be published?

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

Copyright and re-use

Where we hold the copyright on our published information, the information may be copied or reproduced without formal permission, provided that:

- It is copied accurately
- It is not used in a misleading context
- The source of the material is identified

Contact us

If you have any queries about anything contained within this Guide to Information, or if there is some information that you cannot find that you would like to access, please contact:

Cunninghame Housing Association
Quayside Offices
Marina Quay
Dock Road
Ardrossan
KA22 8DA

Email: foi@chaltld.org

Telephone: 01294 468360 (main line)

The Information that we make available to you

Under the MPS, the information we provide must be listed under certain “classes” of information. These are the categories of information that are detailed below. As FOI applies to other bodies and sectors across Scotland – such as Scottish Government and

Councils for example – this means that not all of the categories in the MPS apply to housing associations/co-operatives.²

The details of all the information we hold under each of the classes that apply to our organisation, and hyperlinks to access this information when available online, are outlined below.

Information	Where to access
Class 1 - About Cunninghame Housing Association <i>Information about Cunninghame Housing Association, who we are, where to find us, how to contact us, how we are managed and our external relations.</i>	
Descriptions of who we are	
Mission Statement	Online Mission Statement
Vision	Online Vision
Values	Online Values
Corporate Objectives	Online Strategic Objectives
Area(s) of operation	Online Areas of operation
Key activities; strategic/corporate plan(s)	Executive Summary Corporate Strategy & Business Plan 2020/21 to 2024/25
Executive Summary of Business Plan	Executive Summary Corporate Strategy & Business Plan 2020/21 to 2024/25
Location and opening arrangements	
Address	Online CHA Homepage
Telephone number and e-mail address for general enquiries (and dedicated lines where appropriate)	Online CHA Homepage
opening times	Online Opening Times
General contact arrangements	Online CHA Homepage
local/area office contact details	Online CHA Homepage Online information on our Offices & Opening Times
Contact details for making a complaint	Online Complaints
Information relating to Freedom of Information	
Publication Scheme and Guide to Information	This document
Charging Schedule for Published Information	This document – page 4.
Contact details and advice on making an FOI request	This document – page 5.
Freedom of Information policies and procedures	CE0052 Freedom of Information Policy

² In the MPS Class 8: Commercial Publications and Class 9: Our Open Data do not apply to RSLs.

Information	Where to access
Charging Schedule for environmental information provided in response to requests made under EIRs	This document – page 4-5.
About our Governing Body	
List of Governing Body Members <ul style="list-style-type: none"> • Names • when they became a governing body member • Professional biographical details • office-bearing responsibilities • when they became an office-bearer 	Online Governing Body Members See Appendix 2 of CE0020 Code of Conduct Policy
Description of the role of the Governing Body <ul style="list-style-type: none"> • governance structure chart (including sub-committees and working groups); • remits for board of management and any sub-committees 	Online Governing Body Structure CE0020 Code of Conduct Policy CE0023 Overview on Why We Need Sub Committees
How to become part of the governing body	Online Membership
About our staff	
List of senior management team, including professional biography and contact details	Online Executive Management Team Online Contact Information on Home Page
Organisational structure	Online Organisational Structure
Governance Documents and Corporate Policies	
Rules/Articles	CHA-0919-022 Rule Book
Standing Orders	CE0022 Board of Management Standing Orders
Membership Policy	CE0027 Share Membership Policy
Code of Conduct for Staff	Code of Conduct for Staff
Code of Conduct for Governing Body Members	CE0020 Code of Conduct

Information	Where to access
Entitlements Payments and Benefits Policy (or equivalent, including arrangements for payments for expenses and subsistence)	CE0028 Entitlements Payments and Benefits Policy
Register of Interests	On request
Equalities & Diversity Policy	CE0038 Equalities & Diversity Policy
Health and Safety Policy	CE0001 Health & Safety Policy Statement Policy
Relationship with Regulators	
Engagement plan with Scottish Housing Regulator	Engagement plan
Assurance Statement	Online Assurance Statement
Annual Return on Charter Submission to SHR	Online Annual Return on the Charter
Financial Returns to SHR	https://directory.scottishhousingregulator.gov.uk/Pages/Datasets-and-Reports.aspx
Charter report to tenants	Online Tenant Report on Annual Performance 2018-2019
Internal and External Audit arrangements	Online Audited accounts
Group Details	
Details of our subsidiaries/parent organisation	Online Cunninghame Furniture Recycling Company Online Citrus Energy
Key Partnerships	
Strategic agreements with other organisations	Online Housing Common Allocation Policies for North Ayrshire Council, East Ayrshire Council & Dumfries & Galloway Council
Class 2 – How we deliver our functions and services <i>Information about our work, our strategy and policies for delivering services and information for our service users.</i>	
How to use our services	
List of services provided	Online Tenant services
How to report a repair	Online Report a repair
Right to Repair information	Online Right to repair
How to apply for a house	Online How to apply for a house
How to get information about tenancy support	Online Tenancy support PSH022 Tenancy Sustainment Policy
How to make a complaint	Online Complaints
How to speak to a housing officer	Online Tenant services Housing & Property Services Contacts

Information	Where to access
How we consult with tenants and other customers to inform and improve service delivery and develop new services	How we consult with Tenants and Service Users
Policies and Procedures	
Allocations Policy	Online Allocations policy
Aids & Adaptations Policy	PSA003 Aids & Adaptations Policy
Anti-Social Behaviour Policy	PSH009 Anti-Social Behaviour Policy
Asbestos Management Policy	CE0045 Asbestos Management Policy
Arrears Management Policy	PSH006 Arrears Management Policy
Asset Management Strategy (including stock condition information)	Asset Management Strategy 2018-2013 V1 3
Customer Care Policy	CE0030 Customer Care Policy
Data Protection Policy	Being developed.
Environmental Information Regulations Policy (EIR)	Being developed
Equality and Diversity Policy	CE0038 Equalities & Diversity Policy
Estate Management Policy	PSH005 Estate Management Policy
Health and Safety Policy and procedures	CE0001 Health & Safety Policy Statement
Legionnaires Inspection/Prevention Policy	Controlling the risk of exposure to legionella bacteria in Cunninghame Housing Association premises
Procurement Policy	DCS002 Procurement Policy
Risk Management Strategy	CE0031 Risk Management Strategy
Rent Setting Policy	PSH004 Rent Policy
Repairs Policy	PST001 Reactive Maintenance Policy
Sustainability Policy	Nothing held for this heading.
Tenant Participation Strategy	Online Tenant Participation Strategy
Tenancy Sustainment Policy	PSH022 Tenancy Sustainment Policy
Class 3 – How we take decisions and what we have decided <i>Information about the decisions we take, how we make decisions and how we involve others.</i>	
Governing Body Meetings	
Governing body meeting minutes	Online Governing Body Meeting Minutes
Governing body meeting reports/papers	Online: Board of Management Agendas & Non-Confidential Board of Management Minutes

Information	Where to access
Governing body agendas	Online Governing Body Meeting Agendas
Consultation and Participation	
Tenant Participation Strategy	Online Tenant Participation Strategy
Consultation reports noting the outcome of any recent consultations with tenants/others	Tenant satisfaction survey report 2018 Online Tenant Scrutiny Group Reports
Tenant Scrutiny Panel composition	Available on request.
Registered Tenant Organisations	Tenants & Residents Groups
Class 4 – What we spend and how we spend it <i>Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has actually been spent).</i>	
Information about our accounts and budgets	
Description of funding sources	Online Audited accounts
Audited accounts	Online Audited accounts
Budget policies and procedures	CSF005 Treasury Management Policy
Budget allocation to key service areas	Online Audited accounts
Our programme of work and projects	
Brief details of any project funding and how it's being spent	Online New build and Annual Report
Capital works programme/plans information (annual programme figure)	Online Asset management Capital Works Programme can be found on Executive Report Page 7.
Spending relating to Staff and Governing Body	
Expenses policies and procedures	CE0028 Entitlements Payments and Benefits Policy
Senior staff/governing body member expenses at category level e.g. travel, subsistence and accommodation	Online Audited accounts
Board member remuneration other than expenses	Not applicable

Information	Where to access
Pay and grading structure (levels of pay rather than individual salaries)	Determined by EVH – available on request.
General information about staff pension scheme	Online Audited accounts
Class 5 – How we manage our resources Information about how we manage our human, physical and information resources	
Human resources	
Strategy and management of human resources	Cunninghame Housing Association is a member of EVH. All Human Resources policies come from this organisation. These are available on request.
Staffing structure	Available on request
Human resources policies, covering: <ul style="list-style-type: none"> • recruitment • performance management • salary and grading • promotion • pensions • discipline • grievance • staff development • Maintenance and retention of staff records 	Cunninghame Housing Association is a member of EVH. All Human Resources policies come from this organisation. These are available on request.
Trade Union information	Available on request.
Summary of professional organisations/trade bodies of which we are a member	Glasgow West of Scotland Forum http://gwsf.org.uk/ Employers in Voluntary Housing www.ev.org.uk Scottish Federation of Housing Associations https://www.sfha.co.uk/ Scotland's Housing Network http://www.scotlandshousingnetwork.org/ Tenants' Information Service (TIS) http://tis.org.uk/ TPAS https://www.tpas.org.uk/ Ayrshire Chamber of Commerce https://www.ayrshire-chamber.org/ Dumfries & Galloway Chamber of Commerce https://dgchamber.co.uk/
Physical Resources	
Management of our land and property assets, including environmental/sustainability reports	Asset Management Strategy 2018-2013 V1 3
General description of our land and property holdings	Online Tenant Services and Annual report Land & Property Holding Map 310319
Estate development plans	Executive Summary Corporate Strategy & Business Plan 2020/21 to 2024/25
Information Resources	
Records management policy and records	Awaiting update

Information	Where to access
management plan, including records retention schedule	
Data protection or privacy policy	Awaiting update
Class 6 - How we procure goods and services from external providers Information about how we procure works, goods and services, and our contracts with external providers.	
Our Contractors and suppliers	
Information about our key service delivery contractors who carry out: <ul style="list-style-type: none"> • responsive repairs • landscape maintenance • planned/cyclical maintenance 	Residents Services Xtra Statement http://www.turner.co.uk/ https://www.johnconner.co.uk/ http://www.jamesfrew.co.uk/
List of suppliers and contractors used by organisation (provided to staff under our Entitlements Payments and Benefits Policy)	CE0028 Entitlements Payments and Benefits Policy
Information about regulated procurement contracts awarded (value, scope, duration)	Tenders for works falling under regulated procurement on PCS website https://www.publiccontractsscotland.gov.uk ,
Our Procurement	
Procurement Policy and procedures	DCS002 Procurement Policy
Information on how to tender for work and invitations to tender	DCS002 Procurement Policy
Register of contracts awarded which have gone through formal tendering, including name of supplier, period of contract and value	Procurement Register Nov 2019
Links to procurement information we publish on Public Contracts Scotland website	We publish relevant contracts on Public Contracts Scotland website https://www.publiccontractsscotland.gov.uk/search/search_mainpage.aspx
Framework Agreements	https://www.pfhscotland.co.uk/ , https://www.scottishprocurement.scot/
Class 7 - How we are performing	

Information	Where to access
Information about how we perform as an organisation, and how well we deliver our functions and services	
Annual Report	Online Annual report
ARC report to tenants	Online ARC reports
Performance Standards/indicators	Online Performance
Complaints policy, guidance and forms	Online Complaints
Complaints reports or equivalent to show how complaints are handled and influence service delivery (aggregate reports rather than individual outcomes).	Online contained in Annual report
Tenant scrutiny reports	Online Tenant Scrutiny Group reports
Class 8 – Our commercial publications <i>Information packaged and made available for sale on a commercial basis and sold at market value through a retail outlet e.g. bookshop, museum or research journal</i>	
This class does not apply to Cunninghame Housing Association as we do not produce any publications for sale.	Not applicable
Class 9 – Our open data Open data made available by us under the Scottish Government’s Open Data Resource Pack and available under open licence.	
This class does not apply to Cunninghame Housing Association	Not applicable