



CUNNINGHAME
HOUSING ASSOCIATION

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

GUIDE TO INFORMATION



Cunninghame Housing Association Guide to Information

Last Reviewed:
September_2023

At a glance – terms used in this document

| Term Used | Explanation |
|------------------------|---|
| FOISA | Freedom of Information (Scotland) Act 2002 <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> |
| EIRs | Environmental Information Regulations (Scotland) 2004 <i>Those organisations covered by EIRs have a duty to respond to requests for environmental information</i> |
| SIC | The Scottish Information Commissioner <i>Who is responsible for ensuring that those bodies covered by FOISA and EIRs comply with the terms of the legislation.</i> |
| MPS | Model Publication Scheme <i>Produced by the SIC – this details all of the information that those subject to FOISA should publish (if they hold it)</i> |
| Guide to Information | <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> |
| Classes of Information | <i>Nine broad categories describing the types of information authorities should publish (if they hold it).</i> |

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@chaltd.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@chaltd.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 2023/24 to 2027/28 |
| Executive Summary of Business Plan | Executive Summary Corporate Strategy & Business Plan 2023/24 to 2027/28 |
| 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 from 31 March 2023 to 31 March 2024 Scottish Housing Regulator |
| 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 |
| 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 | CE0029 Data Protection Policy |
| 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 CE0031A Risk Management Framework |
| 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.evvh.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 2023/24 to 2027/28 |
| Information Resources | |
| Records management policy and records | Awaiting update |

| Information | Where to access |
|---|--|
| management plan, including records retention schedule | CE0041 Data Retention Policy CE0041 Record Retention Schedule |
| Data protection or privacy policy | CE0029 – Data Protection Policy |
| 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 | Direct Works 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 June 2022 |
| 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 |