

# **Group Communication & Feedback Strategy 2016-2019**

## **Our Commitment**

Argyll Community Housing Association Group is committed to providing equal opportunities across all services and to avoiding discrimination. This strategy is intended to assist Argyll Community Housing Association (ACHA) and Argyll Homes for All (AHFA) to put this commitment into practice. This applies equally to ACHA and AHFA (the Group) unless stated otherwise.

Compliance with this strategy should also ensure that employees do not commit unlawful acts of discrimination.

**This strategy can be made available in other formats, for example in large print, audio-format or Braille: the document may also be available in other languages, in full or summary form, as appropriate.**

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## Section 1 Context

- 1.1 Our 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.
- 1.2 Communications can be verbal or nonverbal, formal or informal. Our aim is to ensure that customers and staff of Argyll Community Housing Association (ACHA) and Argyll Homes For All (AHFA) 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 the Group (ACHA & AHFA) 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. The Charter has been broken down into sixteen outcomes and outcome number three is all about Participation and states:  
Social Landlords manage their business so that:  
**“Tenants and other customers find it easy to participate in and influence their landlord’s decisions at a level they feel comfortable with.”**

2.4 Data Protection Act 1998 governs the protection of personal data in the UK.

### **Section 3 Our 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.

3.3 We will provide opportunities for our stakeholders to be involved in or to influence the decision making process.

3.4 We will uphold the ethos of best practice, 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. It is particularly important to provide flexibility given the large geographic area of Argyll and Bute, and the diversity of customer's needs, aspirations and circumstances.

Out with our Governing Body (Our Board of Management & Area Committees) we currently have four formal ways in which tenants, in particular can provide feedback on our services.

- Registered Tenant Organisations

We currently have a small number of Registered Tenant Organisations. These are independent constituted organisations which meet regularly and report progress to residents at their Annual General Meeting. They are supported with an annual grant, given development support and help to access other funding, if appropriate

- The Argyll Tenants Panel

The Panel set their own agenda and regularly have guests attending their meetings including senior ACHA and AHFA staff. The Panel also has representatives attending the Regional Networks (Scottish Government administered tenants bodies) therefore there is a good knowledge and understanding of issues affecting local Argyll communities and Scotland-wide policy matters

- Tenants Consultation Register

Joining a tenants' and residents' association does not suit every tenant so we have created a consultation register of actively interested tenants who would like to be consulted on issues which may affect them.

- Your Voice group

Our scrutiny group is independently advised, supported by dedicated staff & chooses its own service areas to examine.

4.1.2 In addition to the above there are lots of more informal ways to provide feedback, such as:

- Taking part in surveys or consultation by post, email, Web, in person or via the telephone
- By returning Repairs Satisfaction cards following completion of repairs to your home
- Attending Public meetings, conferences and seminars
- Taking part in 'Walkabouts' with tenants/staff to look at particular areas
- Open days/ exhibitions/ road shows
- becoming a member of ACHA

OR

- Simply by contacting ACHA with any concerns, suggestions or ideas regarding our services.

## 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 twice yearly Tenants newsletter
- An annual Gypsy Travellers Newsletter
- An annual Factored Owners newsletter
- Annual Sheltered Housing Meetings
- An annual Landlord report
- Via our website
- Face to face contact
- Our Staff attending local meetings
- Press releases
- Leaflets and posters at your Local ACHA office

4.2.2 Our written communications will be 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 Staff will be issued with a” Communications Accessibility Guide “as a supplement to this strategy.

## 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. Via letter, email or telephone etc.

4.3.2 We will answer telephone calls promptly, identify ourselves and will call back within 24hrs 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 acknowledge letters and emails within 2 working days and provide a full response within 10 working days

4.3.4 Full information on the standards of service customers can expect are detailed within our leaflet "Customer Care" leaflet.

#### 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 Board of Management, to make informed decisions about any changes in the way that we deliver services. All comments received remain confidential.

4.4.2 Many of the comments received go on to be included in "Action Plans". These plans assist us in tackling the issues which matter to customers most.

4.4.3 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 ACHA and AHFA. E.g. newsletters, landlord report, website etc.

4.4.4 We will publish minutes of our ACHA Board and Area Committee meetings on our website. This allows customers access to our decision making process.

#### 4.5 **How We Communicate With Staff**

4.5.1 We will use a variety of methods to communicate effectively with staff including: -

- Local team meetings
- Chief Executive Roadshows
- Staff updates
- Staff newsletter
- Email information
- Training and development sessions
- 1-2-1 meetings with line managers
- Weekly circulation of press summary of articles relating to the Group
- Staff surveys

- Performance Development reviews
- Training courses and seminars

4.5.2 We operate a staff suggestion scheme which allows staff to provide comment on how to improve services to customers or internal processes

4.5.3 We have a “shared area” within our IT system which provides staff with easy access to documents and updates.

#### 4.6 **How We Respond To Feedback from Staff**

4.6.1 Staff are invited to take part in consultations on and reviews of services and as with our customers, their views and comments are used to help inform the decision making process. Staff feedback is also used within action plans for service improvement.

4.6.2 The Senior Management Team reviews and considers feedback from staff surveys, the outcome of which is fed back to the staff.

4.6.3 Staff who have made suggestions made via the staff suggestion scheme which are then implemented will receive a small financial reward by way of vouchers.

## **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, which is published in October of each year. A copy of the Landlord Report is also available on our website and on request at our local offices.

5.2 We will provide information on our performance via various newsletters issued to customers.

5.3 Performance indicators are compiled and reported to our Senior Management Team. Performance information is also provided to the Board of Management, Area Committees and the Argyll Tenants Panel on a regular basis.

5.4 The indicators we report against are taken from various sources:



- Benchmarking against other Registered Social Landlords
- Internal targets
- Scottish Housing Regulator publication
- Scottish Public Services Ombudsman targets

## **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 SMART targets will be used wherever possible. `SMART` stands for Specific Measurable Achievable Realistic and Time-constrained. When targets meet these criteria, we can tell if we have achieved them or not.

## **Section 6 Development and Training**

- 6.1 This document is reviewed on a 3 yearly basis and circulated to all employees. Any resultant training will be programmed for employees, either individually, by department or as a whole.

## **Section 7 Our Positive Action Initiatives**

### **7.1 Our ACHA Website: [www.acha.co.uk](http://www.acha.co.uk)**

7.1.1 This communication tool offers excellent accessibility at a low cost. It will be used when possible to publish information and encourage feedback. All of the documents published on our website will be made available in other formats on request, when appropriate.

7.1.2 We seek to open up two way communication with all of our stakeholders. Work will be on-going to develop an AHFA web presence.

### **7.2 Tenant Participation Strategy**

7.2.1 We have developed a Tenant Participation Strategy which was reviewed in 2016. The Tenant Participation Strategy is designed to:

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

### **7.3 Tenants Handbook**

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

### **7.4 Tenant Satisfaction Surveys**

7.4.1 Tenant Satisfaction Surveys are undertaken regularly by staff across all areas. The survey is carried out by telephone. There are also a number of mechanisms for seeking tenant's views across many of our activities: -

- Regular repairs satisfaction information is gathered for reports. This is currently carried out using survey forms and telephone contact.
- A Factoring Satisfaction Survey is carried out for all customers subscribing to the service. The outcomes of all surveys are used to shape our services and focus on customer satisfaction.
- An annual Gypsy Traveller satisfaction survey is undertaken face to face.

- Annual meetings are held at our Sheltered Housing Complexes during which satisfaction questionnaires are issued.

## **7.5 Registered Tenant Organisations**

7.5.1 There are currently a small number of Registered Tenants Organisations registered with us and they receive support and funding to enable them to operate successfully.

## **7.6 The Argyll Tenants Panel**

7.6.1 The Tenants Panel is made up of representatives of the Registered Tenant Organisations and also members of the Tenants Consultation Register.

The Panel meet every two months and are involved in local and national policy development.

## **7.7 The Tenants' Consultation Register**

7.7.1 The Tenants' Consultation Register is a way for ACHA to encourage tenants to participate in an informal and flexible manner usually through, email, postal or telephone questionnaires. This is ideal for tenants who are unable to travel to meetings or prefer to participate in a more arm's length way. The Tenants Consultation register is not currently available to AHFA tenants.

## **7.8 Newspapers, Radio, Professional Journals and Other Media**

7.8.1 Our senior staff members have been trained in dealing with the media. The Chief Executive's office will deal with all AHFA and ACHA media enquiries.

7.8.2 Press releases are issued regularly by us to the local press, local radio stations and professional journals keeping them informed of our successes, milestones and innovations.

7.8.3 A proactive relationship with the local press has been developed to use this medium more effectively in order to communicate with all communities. There has been significant press interest in us since our inception, not only as the largest social housing landlord in Argyll, but also as one of the largest employers and a business with a huge annual turnover.

## **7.9 Argyll Community Housing Association Members**

7.9.1 The 6 monthly Tenants Newsletter and Annual Landlord's Report are made available to each member. Attendance at the Annual General Meeting (AGM) is encouraged and the opportunities to join the ACHA Board of Management and Area Committees are made clear.

## **7.10 Annual Accounts**

7.10.1 The Report of the ACHA Board of Management and Financial Statements are published on ACHA's website following agreement at each year's AGM.

## **7.11 Landlord Report**

7.11.1 A report on our progress is published each year. The report is available electronically and in paper format and uses graphics to help convey messages.

## **7.12 Annual General Meeting (AGM)**

7.12.1 The dates and venues are published in tenant's newsletters and all members are sent invitations. Specific needs of attendees are met with regard to their attendance. A report on the AGM will feature in the tenants' newsletter and a press release will be issued prior to and following the meeting.

## **7.13 Social Networking**

7.13.1 We continue to consider use of social networking as a form of customer contact and feedback. It is recognised that this is a popular medium especially for tenants in the 16- 34 age bracket. The advantages of this form of communication is that it would provide a cost effective way of engaging on-line and give us a broader reach beyond traditional communication methods

## **7.14 Your Voice Tenant Scrutiny Panel**

7.14.1 Our Tenant Scrutiny Panel enables tenants to scrutinize our policies and procedures and assess if they are "fit for purpose".

## **Section 8 Dealing with Complaints**

- 8.1 The ACHA Board of Management receives a quarterly report on the outcomes and actions taken in dealing with complaints. Statistical information on our complaints is published in our Annual Report.
- 8.2 We have implemented a Complaints Handling Procedure which has been approved by the ACHA Board of Management. The procedure was originally developed by the Scottish Public Services Ombudsman. All formal complaints outcomes are reviewed by the Senior Management team on a monthly basis.
- 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 website [www.acha.co.uk](http://www.acha.co.uk).
- 8.6 We have an embedded complaint handling process in our organisation. Complaints can be made in person at any of our offices, by telephone, in writing, by email or by using our complaint form available on our website: – <http://www.acha.co.uk/Services/complaints.html>

## **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:
- Tenants
  - Anyone who receives a service from us

- 9.2 Tenants, Employees, ACHA Board of Management, ACHA Area Committee members and AHFA Board of Directors will be informed of all major decisions via face to face meetings, Tenants Newsletters, Press Releases, Website updates, Chief Executive Roadshows, staff newsletters, updates, team meetings and Tenant Scrutiny Panel.

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

### **10.1 Confidentiality**

- 10.1.1 All employees, members, ACHA Board of Management members, ACHA Area Committee members and AHFA Board of Directors are required to follow our Confidentiality Guidance.

#### **10.1.2 General**

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;

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.

The general rule that should be adopted is a position of non-disclosure.

### **10.2 Data Protection**

- 10.2.1 The Data Protection Act is complex and sets out eight 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, only relates to living persons. It does not relate to property or any other aspect of ACHA.

10.2.2 We hold a range of personal information which would fall within the terms of the Data Protection Act, for example:

- Applicants for employment;
- Applicants for housing;
- ACHA Area Committee members;
- ACHA Board of Management members
- AHFA Board of Directors
- Contractors, suppliers and consultants;
- Employees;
- Factored Properties
- Information held on current, past and future tenants;

10.2.3 For obtaining and processing any personal data, we must first obtain a valid Subject Access Request and then obtain the person's explicit consent to process that information. There are a number of exemptions under which publication may be made, for example;

- It is necessary in respect of legally imposed employment rights and obligations;
- The individual has already made it publicly available;
- It is necessary for legal proceedings;

The mere categorisation of a request as falling under an exempt category is not sufficient to proceed. It is necessary to demonstrate that a proper analysis and evaluation has been undertaken to arrive at a position where an exemption may apply. If in doubt consult with ACHA's designated Data Controller.