



CONFIDENTIALITY POLICY

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Rochdale Boroughwide Housing Limited is a charitable community benefit society.
FCA register number 31452R.

Registered Office: Sandbrook House, Sandbrook Way, Rochdale OL11 1RY.

Registered as a provider of social housing. HCA register number: 4607



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1 Introduction

- 1.1 Rochdale Boroughwide Housing (RBH) aims to conduct its business in a manner which is open, transparent and accountable, whilst, at the same time ensuring that personal, business and commercial confidentiality is maintained where appropriate.
- 1.2 RBH believes that its members, tenants, employees, volunteers and other interested parties (e.g. applicants for housing, leaseholders etc.) should have access to information on how it conducts its business unless it is considered to be commercially sensitive or confidential from a personal nature.
- 1.3 Confidentiality is of great importance. Breaches of confidentiality can have serious consequences. Each individual has a responsibility to maintain confidentiality where required and prevent breaches. It does not just affect RBH as a Society but Board members, Representative and all employees as set out in the respective codes of conduct.

2 Scope

- 2.1 This policy relates to proper use, management and storage of all information related RBH, its members, employees, tenants, service users, partners and stakeholders. It relates to the use of information in written, electronic, verbal or any other form. The policy crosses over with the following RBH documents:
 - a) **Data Protection and Information Security Policy** – which relates to RBH measures to legally protect personal data on individuals.
 - b) **Code of Conduct for Employees** – outlines Employee responsibilities in relation to confidentiality.
 - c) **Code of Conduct for Board Members** – outlines Board members responsibilities in relation to confidentiality.
 - d) **Code of Conduct for the Representative Body** – outlines Representatives; responsibilities in relation to confidentiality.
 - e) **Homeworking Policy** – outlines the measures necessary to maintain confidentiality whilst homeworking.

3 Context

- 3.1 **Definition** - Confidentiality is the limitation, where necessary, of the use of information to only authorized persons i.e. the maintenance of privacy. It is not possible to produce a definitive list of all items considered confidential. The following types of information, however, should always be considered as confidential and at no time divulged inappropriately:
 - a) **Corporate** - commercially sensitive information which may jeopardise a development or business opportunity while negotiations are on-going, for

example when procuring contracts for the supply of goods or services;

- b) **Employee** - all employee data records (both paper based and electronic) including particularly details of earnings, equality and diversity monitoring details, absence records, recruitment processes and any disciplinary or grievance proceedings, such information is also subject to the Data Protection Act 1998 (see the Data Protection and Information Security Policy).
- c) **Service Users** - personal and sensitive information of tenants, housing applicants and other service users. The Data Protection and Information Security Policy provides additional guidance on this type of information but the following details of tenants are commonly held by RBH:
 - Name and age of tenant;
 - Addresses and telephone numbers;
 - National Insurance number;
 - Details of income and benefits;
 - Rent payment history and bank account details;
 - Any complaints made against a resident and their response and vice versa;
 - Any criminal convictions in so far as they affect the tenancy;
 - Any support package provided as a condition of granting a tenancy;
 - Correspondence between RBH and the resident;
 - Religion, gender, sexuality, ethnicity, disability, caring responsibilities and language;
 - Names, ages and genders of household at applicants address and members of proposed household;
 - Medical conditions which may affect housing requirements.

3.2 Mishandling of Confidential Material - In the wrong hands, confidential information can be misused to commit illegal activity (e.g., fraud or discrimination), which could in turn result in costly lawsuits for RBH. The disclosure of sensitive employee and service user information could lead to a loss of employee or service user trust, confidence and loyalty. This will almost always result in a loss of productivity for the Society.

4 Policy Aims and Objectives

4.1 This policy aims to:

- a) ensure Board members, Representatives and employees have necessary guidance to identify what information is or may be confidential.
- b) ensure Board members, Representatives and employees know their responsibility to use, manage and store information whilst maintaining confidentiality.

4.2 This policy links with the following RBH values adopted by the Representative

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Body:

- **‘Responsibility’** – We take responsibility for, and answer for, our actions.
- **‘Equity’** – We carry on our business in a way that is fair and unbiased.
- **‘Democracy’** – We give our members a say in the way we run our business.
- **‘Openness & Honesty’** – We will share information, do what we say we will do and when we make a mistake we will own up to it.

5 Methodology

- 5.1 The policy has been reviewed by managers within the RBH Resources Directorate in response to a number of lessons learnt since the previous confidentiality policy was published in March 2014.
- 5.2 On 25th May 2018 new EU General Data Protection Regulation is due to take effect. This policy as well as the Data Protection and Information Security Policy will be subjected to a full review and approval process prior to the new regulations coming into force. The new policies will need to fully address the confidentiality and data sharing needs of Public Service Integration and Greater Manchester Devolution which are expected to be significant.
- 5.3 An Equality Impact Relevance Test has been conducted for this policy. A full Equality Impact Assessment was not found to be necessary.

6 Responsibility for Classification and Declassification of Confidential Information

- 6.1 The author/creator of any piece of RBH business information is responsible for determining whether or not it is confidential as required by this policy. If it is then the author becomes responsible for treating the material as laid out in this policy.
- 6.2 In the event there is uncertainty as to whether certain information is confidential then a Board member or Representative should consult the Secretary and an employee their line-manager.
- 6.3 In the event information is found which is confidential but not marked as such then a Board member or Representative should contact the Secretary and an employee their line-manager immediately.
- 6.4 Sometimes due to changes in circumstance information that is confidential ceases to be confidential. In this situation the original author should be contacted and asked whether the information can be declassified. If so the information should then be treated as open information.
- 6.5 If there is any doubt as to whether certain information should be confidential or not or considered for declassification, the Head of Legal and Compliance is to be consulted.
- 6.6 Information that is not classified as confidential should be treated as open information.

7 Guidelines for Treatment of Confidential Information

7.1 Paper Documents

- a) All paper documents containing confidential information should be clearly marked “Confidential” in the centre of the header and footer of each page.
- b) Reports containing confidential material due to be considered at a meeting must have a confidential cover sheet (an example template is at Appendix D) at the front of the report explaining what the document is and in general terms why the document is confidential.
- c) Following a meeting with confidential agenda items and/or reports care is to be taken to ensure confidential paperwork is disposed of appropriately and not left behind.
- d) Care should be taken when sending confidential information to a remote printer that it is either stored securely within the designated printer until the authorised employee can access and print it or collected immediately and not left lying around on the printer for others to see (see the Data Protection and Information Security Policy for more information).
- e) Care should also be taken when photocopying a confidential document that it is not accidentally left on the photocopying machine or can be overseen by someone waiting to use the photocopier. If the printer utilises a security code then this should also be used.
- f) Any paper document containing confidential information when not in use is to be stored or archived in a locked container and access to the container controlled.
- g) Where confidential information is to be destroyed as opposed to archived confidential waste bins or shredding facilities are always to be used.

7.2 By post

- a) Where confidential information is sent by post it should always be marked ‘Private and Confidential – For attention of Addressee Only’. Appropriate details of the information disclosed, to whom and when, should be recorded on a diary note within an appropriate computer based file.

7.3 Information on Computer

- a) Computer screens should always be locked if there is a need to move away from the work station.
- b) Computer passwords should be changed at appropriate and regular intervals and should not be shared with any other person or colleague.
- c) All electronic documents containing confidential information where possible should be clearly marked “Confidential” at the top and bottom of each page of the documents.
- d) Where possible filenames for documents containing confidential information should include the word “CONFIDENTIAL” or letters “CONF” at beginning or end.

- e) Access to documents and folders containing confidential material should be controlled by either:
 - a) permissions to the folder being restricted via a request to the IT Service Desk, or
 - b) By encrypting the specific document with a password.
- f) At no time is confidential information of any kind to be posted on social media. If an individual is not sure whether or not something is confidential they should first check with the Head of Legal and Compliance or the Marketing and Communications Team.
- g) Additional guidance on the principles and working practices to be adopted by all users in order for data to be safely stored and transferred on removable media and mobile devices is provided in the Data Protection Policy.

7.4 By Email

- a) Where confidential information is supplied via email, care must be taken to ensure the email goes only to the intended recipient. Common practise is to put the confidential information into a password protected document. This document is then sent via email and followed up with a phone call where the password is then supplied.
- b) When replying to or forwarding an email and there is a chain of emails one should take care to ensure there is nothing confidential unintentionally contained within the chain.
- c) When sending email to multiple recipients, one should consider whether or not the email address of the recipients are confidential and if so, use the Blind Carbon Copy (BCC) address option function.

7.5 Face to face

- a) Breaching confidentiality is not just restricted to paper based or computer records, care should be taken when discussing matters of a confidential nature, (for example enforcement action or Anti Social Behaviour action) with colleagues that the conversation is not being overheard by someone else who has no legitimate right to be aware of the information. This is particularly pertinent in open plan offices such as Sandbrook House and St Alban's House and in public spaces such as cafeterias, office kitchens and other spaces where people congregate.
- b) The identity of a person making an enquiry about confidential information must be verified in the first instance, such as by requesting sight of an identification card, driving licence or passport.
- c) Conversations at meetings during confidential agenda items are to be considered confidential and not be repeated to any person unauthorised to be party to the original agenda item in question.

7.6 By Telephone

- a) Confidential information should not normally be divulged to telephone callers as it is not always easy to confirm the identity of the caller. However, where information is requested by telephone by an external organisation you should contact the enquirer through a central switchboard or contact centre rather than a direct line as this may provide an opportunity to verify that the caller is genuine and is calling on behalf of a legitimate organisation.
- b) When dealing with an RBH service user via the telephone requesting confidential information about themselves, the three point ID check must always be undertaken. The caller should be asked for name, address and DOB. This should be checked against RBH records. Confidential information is not to be divulged if the three point ID check is failed.
- c) Employees should not respond to press enquiries over the telephone. Instead they should refer press member to the Resources Communications and Marketing team (Telephone 01706 273824).

7.7 Working Agile

Agile Working places additional demands on employees as they work in different ways, including an increased amount of home working and more travel associated with employees travelling to work in the neighbourhoods and campus premises.

- a) **From Home** - In the case of home working, employees should take care that any work related information that they may work on in either hard copy format or on their own personal PC's (whether saved or not) is protected so that it cannot be accessed or viewed by other family members.
- b) **Within RBH Neighbourhoods** - For employees who predominantly work in an agile way, e.g. Neighbourhood Housing Officers, Technical Officers etc, it is likely that there will be more occasions when they are travelling between neighbourhoods and either the campus or Sandbrook House and are in possession of work related information that is likely to be of a confidential nature. Again employees should take extra care that such information is not left unattended, for example on a car seat.

7.8 Openness and Disclosure

- a) Given the constraints outlined above and RBH's commitment to being open and honest, Appendix A provides members, Board members, Representatives, employees, tenants and other service users clear guidance on what remains open and available for disclosure.
- b) Board and Representative Body meetings are generally conducted openly with the exception of confidential items. Appendix B contains guidance to members for observing Board and Representative Body meetings.

8 Information Sharing

- 8.1 When shared for the right reasons information delivers value. For this reason it is important that authors and authorised handlers of information do not

unnecessarily designate information as confidential and therefore put in place unnecessary barriers to the sharing of information. This would be in contravention to RBHs value of Openness and Honesty. Nevertheless for information that is correctly designated confidential, the following measures must be adhered to:

8.2 Internal Sharing

- a) Sharing of confidential information between employees of RBH will be strictly on a “need to know” basis, e.g. HR team sharing details of a health issue with their manager or gathering information for disciplinary investigations.
- b) Our Mutual Future: Corporate Strategy 2015 – 2018 committed the Society to implementing a Customer Relationship Management (CRM) framework. Implementation is advancing with the full system expected to be up and running by September 2017. All CRM related procedures will need to be compliant with this policy.

8.3 External Sharing

- a) There are circumstances where it is necessary to exchange information with other agencies without the consent of the individual concerned, for example to prevent or detect crime, when there is a legal requirement to share this information or if the safety of an individual is at risk. These agencies may include:
 - Children’s and Adult Care Services
 - Revenues & Benefits
 - The Inland Revenue
 - The Benefits Agency
 - The Police
 - A Court Officer or Bailiff
 - The Homes and Communities Agency
- b) In these circumstances information should only be supplied within the relevant agreed guidelines, for example the Safeguarding Adults and Children Policies and should be limited to factual data relevant to the particular information enquiry.
- c) RBH is regularly contacted by Councilors or MPs acting on behalf of RBH tenants, and prospective tenants. In 2012 as part of the transfer of ownership of homes from the Council to RBH, a Protocol was developed to help guide such exchanges of information. The document is Schedule 8 of the Transfer Agreement and titled the Member Protocol. It is included in full at Appendix E. Councilors or MPs are to be given access to documents and information (subject to data protection legislation and requirements set out in this policy) on the following conditions:
 - Access to the information/documents is reasonably necessary to enable Councilors to properly perform their duties;
 - Councilors or MPs must demonstrate they have a “need to know”;
 - Information provided must only be used for the purpose for which it was provided, namely in connection with the Councilor or MP’s duties

– unless the information is already in the public domain.

“Need to know” should normally be demonstrated through written or electronic evidence from the tenant or individual requesting representation from the Councilor or MP. These requirements are different for candidates standing for election to Council or Parliament, full guidance on is at Appendix E.

d) Employees, volunteers, Representative Body and Board members should also be aware that there are a number of Data Sharing Protocols in existence. These protocols provide more specific guidance on what, when and how information may be shared with the relevant partners. The existing protocols to be followed are:

- Information sharing between Greater Manchester Fire & Rescue Service (GMFRS) and Rochdale Boroughwide Housing (RBH): Corporate Planning and Intelligence,
- Clause 23 of the Transfer Agreement between Rochdale Borough Council and RBH sets out the responsibilities each party has towards the other with regard handling each others information,
- Schedule 8 of the Transfer Agreement, “Member Protocol” sets out how guidance for sharing of data between RBH employees and local Councilors, MPs or respective candidates.

e) On 25th May 2018 new EU General Data Protection Regulation is due to take effect. These will impact on RBH data sharing protocols.

8.4 Anyone who feels unsure as to whether it is permissible to share information or not should seek advice from their line manager in the first instance or through the Head of Legal and Compliance (Telephone 01706 273775).

9 Equality & Diversity

9.1 An Equality Impact Relevance Test has been conducted. It was assessed that a full Equality Impact Assessment was not required.

10 Monitoring

10.1 All employees have a responsibility to ensure information is to be confidentiality used, managed and stored. Any person seeing confidential information not being used, managed or stored in accordance with this policy is to report it immediately to their line manager and/or Head of Legal and Compliance.

10.2 Breaches of this policy are to be reported to the Audit Committee and Board as part of the regular Risk and Compliance Update.

10.3 Line managers are to ensure team members are aware of and complying with this policy.

10.4 The Head of Service for Legal and Compliance is responsible for monitoring compliance with this policy. From time to time management and internal audits

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will be conducted to ensure confidentiality is being properly maintained across the Society.

11 Review

11.1 The policy will be fully reviewed in time for the 25th May 2018 when new EU General Data Protection Regulation is due to take effect.

12 Thematic Links with other SPSS Documents

As per the scope.

Confidentiality Policy Appendix A:

Openness & Public Disclosure Guidance

1 Purpose

- 1.1 The purpose of this guidance is to make clear to RBH members, Tenants, Employees and the Public, what information they have access to regarding RBH business. This guidance also states where this information may be found and when it is made available.

2 Scope

- 2.1 This guidance explains what, how and when information is made available to RBH members and the Public. That is principally in the following ways:
- Key Documents
 - Formal Meetings
 - Agendas, Reports and Minutes of Meetings
 - Engagement Groups

3 RBH Values

- 3.1 Rochdale Boroughwide Housing (RBH) as a mutual society aims to conduct its business in a manner which is transparent to its members, tenants and other interested parties. This policy links with the three of the seven mutual membership values adopted by the Representative Body:
- **Openness and Honesty** – We will share information, do what we say we will do and when we make a mistake we will own up to it;
 - **Equity** – We carry on our business in a way that is fair and unbiased;
 - **Democracy** – We give our members a say in the way we run our business.

Whilst RBH is already obliged to release certain information under the Mutual Rules, the Data Protection Act 1998 and in accordance with the Homes and Communities Agency (HCA) 2015 Regulatory Framework for registered providers of housing, RBH goes further than these requirements in keeping with the RBH values.

4 Freedom of Information Act

- 4.1 The organisation falls outside the remit of the Freedom of Information Act (FOIA) but there are circumstances where we hold information on behalf of other organisations that are covered by FOIA e.g. Rochdale Council. In cases where such organisations, in response to a Freedom of Information Request, ask RBH to provide data to them, RBH will send the requested information directly to the organisation dealing with the request not to the originator of the request.

5 Subject Access Request

- 5.1 The Data Protection Act 1998 gives all individuals the right to make a request, in writing, to obtain a copy of any information that RBH holds about them on computer and in certain manual filing systems. They are also entitled to be given a description of the information, what RBH use it for, who it might be passed on to and any information RBH may have about the source of the information.
- 5.2 The right applies to anyone about whom RBH holds information. This could be current and former employees, current and former tenants and residents, service users, suppliers and contractors. If therefore, RBH holds data on individuals and, if the subject of the data so requests, RBH is required to provide details of the data held as described above, together with an explanation of any technical terms used in the information.
- 5.3 See the RBH Data Protection and Information Security Policy for more information on Subject Access Requests.

6 Key Documents

- 6.1 **Corporate Strategy** - sets out RBH's priorities for the forthcoming 3 to 5 years. Within the strategy are a number of high level programmes which will be delivered. The strategy is approved by the Representative Body and published on the website.
- 6.2 **Mutual Rules** – govern the democratic structure of RBH and contain some requirements for what information members are entitled to. The rules are available on the website and any member also has the right to request a printed copy free of charge.
- 6.3 **Annual Report to Tenants** – Each year we are required to publish an Annual Report to our tenants describing the activities of the organisation in the previous year. This is available on the website.
- 6.4 **Other Documents** - Annex 1 contains a summary of other RBH published documents and where to find them.

7 Newsletters

- 7.1 RBH communicates with its employees, tenants and members through a range of publications.
 - a) **In the Know** – is a quarterly online newsletter for tenants containing news about RBH's activities.
 - b) **Membership Matters** - is a quarterly newsletter to Members. Members can choose to receive this electronically or by post. Past copies of Membership Matters can be found in the online members' area.
 - c) **Core Brief** – is a monthly newsletter to Employees which is disseminated electronically. For full details see Annex 1.

8 Formal Meetings, Agendas, Reports and Minutes

- 8.1 RBH has a democratic structure comprised of a Board and a Representative Body. Through these formal meetings certain information is published for the benefit of members of the Society.

Representative Body and Board Meetings

- 8.2 Times, dates and venues for meetings of the Representative Body and Board will be published on the RBH website in the members area with no less than five working days notice of the date.
- 8.3 An agenda along with public reports will be published on the secure member area of the website no less than five working days before the date of the meeting.
- 8.4 Confidential reports will not be included in the reports published on the website. Confidential matters include but are not limited to: personal matters about an identifiable individual (including tenants and employees), matter of a sensitive commercial nature, employment issues, litigation or potential litigation affecting RBH and the receiving of advice that is subject to solicitor-client privilege.
- 8.5 The minutes will appear in the secure member area of the website one working day after they have been approved, this is usually done at the following meeting of the Board or Representative Body.
- 8.6 Members are entitled to attend meetings of the Board and Representative Body so long as they give two working days notice of their wish to attend. Notice is to be given to the Governance Co-ordinator on 01706 273815 or RBH.Governance@rbh.org.uk.

Members Meetings

- 8.7 Members meetings are either Annual Members' Meetings (AMM) or Special Members' Meetings (SMM). RBH holds the Annual Members' Meeting within six calendar months after the close of each financial year or such later date as may be allowed by law. Members Meetings are open to all Members, Associates, Representatives and Directors, and the Auditor, all of whom have the right to speak. The Chair of the Board, will chair the meeting. If he/she is unable to do so a Chair will be elected at the start of the meeting. All members are invited to the AMM (usually via Membership Matters). In advance of the meeting Members can request a copy of the Annual Financial Statements and the Representative Body annual report to Members. Minutes of the AMM minutes are circulated within the following Membership Matters Newsletter. All information, agenda, reports and minutes for AMMs can be found in the members online area.

9 Customer Improvement Groups and other Engagement Opportunities

Customer Improvements Groups (CIGs)

- 9.1 The Homes and Communities Agency's (HCA) regulatory framework for registered providers of social housing is made up of 'Consumer Standards' and 'Economic Standards'. One of the Consumer Standards covers Tenant Involvement and Empowerment and requires that tenants be given a wide range of opportunities to shape and scrutinise services. RBH has established formal member engagement structures in order to enable this:
- a) **Customer Panel** – Monitors the Tenant Involvement and Empowerment Standard as well as overall levels of RBH customer service.
 - b) **Homes Panel** – Monitors that RBH Homes are being maintained to the decent homes standard through works or repairs which are being carried out.
 - c) **Communities Panel** – This panel examines neighbourhood issues such as anti-social behaviour and how RBH is ensuring communities can flourish.
 - d) **Services for All Panel** – This Panel monitors all standards but from specific viewpoints such as young tenants, ethnic minority tenants or disabled tenants.

Scrutiny Function

- 9.2 A pool of members are called upon to scrutinise performance by undertaking two reviews each year. Due to its work it has greater access to RBH management information which is only used for the purposes of reviews.

10. Conclusion

- 10.2 This guidance document has set out the opportunities for members, tenants, employees and the Public to access information on RBH. RBH remains committed to open and transparent governance of the Society.

Annex 1 – Published Information

Annex 1 – Published Information

Who We Are and What We Do

Item	Frequency	When Published	Web Area Posted	Retention Time	Notes
Introductory Board member biographies	Standing	On change of members	Public	Standing	
Introductory Representative Body biographies	Standing	On change of members	Members	Standing	
Corporate Strategy	Annual	Start of Financial Year (April)	Public	10 Years	<ul style="list-style-type: none"> Approved by the Representative Body. Includes RBH Vision, Mission and Values.
Mutual Rules	As amended	On approval from members	Public	Standing	Any member has the right to request a paper copy of the rules from the Secretary.

What We Spend and How We Spend It

Item	Frequency	When Published	Web Area Posted	Retention Time	Notes
Annual Accounts	Annually	After AMM (September)	Public	6 Years	
Value for Money Statement	Annually	September	Public	6 Years	
Invoices over £500	Monthly	End of month	Public	6 Years	
Directors Salaries	Annually	14 days prior to AMM	Public	6 Years	Submitted within Annual Accounts
Expenses Claimed Directors/Representatives	Annually	End of Financial Year	Public	Until replaced	

What Our Priorities Are and How We Are Doing

Item	Frequency	When Published	Web Area Posted	Retention Time	Notes
Representative Body Report to Members	Annually	14 days prior to AMM	Members	10 Years	Also mailed to Members.
RBH's Annual Report to Tenants	Annually	1 st October	Public	10 Years	Includes statistics of formal complaints received
Performance Report	Quarterly	End of each quarter	Public	6 Years	
In the Know Newsletter	Quarterly	Quarterly	Public	6 Years	For all tenants
Core Brief	Monthly	Monthly	Intranet	6 Years	For employees only
Membership Matters	Quarterly	Quarterly	Members	6 years	For all members – also available by post.

How We Make Decisions

Item	Frequency	When Published	Web Area Posted	Retention Time	Notes
Board and Representative Body Agendas & Reports	For each meeting	Five working days prior to meeting.	Members	6 Years	No confidential reports will be published.
Board and Representative Body Minutes	For each meeting	Once approved at following respective meeting.	Members	10 Years	No confidential minutes will be published.
Board and Representative Body Meeting Summaries	For each meeting	Once minutes approved.	Public	10 Years	No confidential matters will be published.

Our Policies, Strategies and Service Standards

Item	Frequency	When Published	Web Area Posted	Retention Time	Notes
Policies, Strategies and Service Standards that impact directly on front line services		On approval	Public	Until replaced or removed	
Mutual Governance Excellence Framework		On approval	Public	Until reviewed	
Representative Body Code of Conduct and Expenses Policy		On approval	Public	Until reviewed	
Board members' Code of Conduct and Expenses Policy		On approval	Public	Until reviewed	

Lists/Registers

Item	Frequency	When Published	Web Area Posted	Retention Time	Notes
Board Register of interests	Annually	Start of financial year	Members	6 Years	
Representative Body Register of interests	Annually	Start of financial year	Members	6 Years	

The Services We Offer

General information about the services that we offer can be found on the RBH website..

Confidentiality Policy Appendix B:

Open Meetings Guidelines

1 Introduction

- 1.1 Representative Body and Board meetings are usually open to members of the Society. RBH considers that this facilitates the open and transparent conduct of the Board and Representative Body's business; ensures that the Society maintains a close relationship with the members and generates trust, openness and accountability.
- 1.2 It is important to recognise that these are not public meetings. Any member attending a Board or Representative Body meeting is invited as an observer only. The Secretary may decline to invite a person on reasonable grounds.
- 1.3 Any members who wish to attend should read the information below to ensure that meetings are productive for all involved.

2 Attending Meetings

- 2.1 Dates, times and venues of the meetings for the Representative Body and the Board will be published on the RBH website with no less than seven days notice of the meeting.
- 2.2 Any member wishing to attend a meeting must contact a member of the Governance Team on 01706 273815 or by email RBH.Governance@rbh.org.uk within 7 and 2 days before the date of the meeting to make their request to attend. If you wish to attend and have specific access needs, such as wheelchair access please provide that information when you make your request to attend. Members who do not follow this procedure will not be admitted to the meeting.
- 2.3 Members attending the meeting may be required to provide identification and to sign-in upon arrival at the meeting. The names provided through this process may be listed among the attendees included in the official minutes of the meeting. Attendees may also be asked to comply with measures to address safety and security considerations.
- 2.4 Space in the meeting room is limited. Attendance is on a "first come first served" basis. If a large number of people attending the meeting wish to attend with an interest in a particular item of the agenda, a representative should be nominated to attend on behalf of the group.
- 2.5 It is the expectation that the business of these meetings can proceed appropriately and with full attention to a safe, comfortable and secure environment for all meeting participants.
- 2.6 Parking arrangements are usually available at meeting locations. However travel arrangements are the responsibility of members, as are all costs associated with attending.
- 2.7 The following matters should be noted:

1. Attendees will not be provided with a copy of the meeting papers, but will be provided with a copy of the agenda.
2. Attendees may only speak if invited to by the Chair.
3. An issue will not be deferred because members cannot be present for the meeting.
4. The Chair will not permit debate or questions regarding individual cases or complaints including issues that are sensitive and confidential.
5. The Chair will ensure meetings take place without disruption. The Chair has the right to exclude members if they cause disruption.
6. Observers must leave the meeting immediately if requested to do so by the Chair.
7. Any attendee (Board member, employee or member) will withdraw when requested to do so by the Chair.
8. No audio or visual recording by any attendee at the meeting is permitted without prior approval by the Chair. You can take written notes of the meeting.

Conflicts of Interest

- 2.8 Board Members and Representatives are required to state at the start of the meeting if they have an interest in the items to be discussed. Members attending meetings will be given an opportunity to do this by the Governance Team at the start of the meeting and to state whether they have any relevant formal affiliations.

Debate

- 2.9 The Board/Representative Body considers the items on the agenda in turn. At a meeting each report for decision includes a recommendation as to what should be decided. For some items there may be a presentation whereas for others this may not be necessary. Every item may not be actively discussed; this does not mean that the item has not received careful consideration but means that no-one wants to challenge the recommendations. A formal vote will not be taken if there is a general consensus on a suggested course of action.
- 2.10 Depending on the type of meeting being held by the Representative Body there may not be reports presented as it may not be appropriate.

Confidential Items

- 2.11 Board/Representative Body meetings are open except for matters which may be deemed to be confidential. Confidential matters are addressed in closed session.
- 2.12 Closed sessions may be held at the beginning or the end of meetings. On occasion it may be necessary for the whole of a meeting to be closed to member attendance. Only those persons authorised by the Chair to remain at the closed session of the meeting will be permitted to remain.
- 2.13 Closed sessions will be held to discuss items of a confidential nature,

including but not limited to: personal matters about an identifiable individual (including tenants and employees), matters of a sensitive commercial nature, employment issues, litigation or potential litigation affecting RBH, the receiving of advice that is subject to solicitor-client privilege.

- 2.14 Confidential Reports will not be published on the secure member area of the RBH website, however a cover sheet will be provided giving the title of the confidential item and explaining the grounds for it being classed as confidential.

3 Questions from Members

- 3.1 If you have specific questions for the Board or Representative Body, these cannot be raised at the meeting. Please contact the Governance Team to raise your question(s). You should be aware that your question may not be put to the Board or Representative Body, as it may fall outside of their remit, or it may not be possible for an answer to be given immediately. Written answers will usually be given within seven days.

4 Minutes

- 4.1 A record of the issues discussed and decisions taken at the meeting will be set out in the minutes, which will be approved as a correct record at the next meeting. The minutes as presented to the next meeting are then made available on the secure members area of the website. Those items discussed in closed session may be omitted from the published minutes if they still remains confidential.

5 Contact Details

- 5.1 For further information on attending meetings, please contact the Governance Team on 01706 273815 or email: RBH.Governance@rbh.org.uk.

Appendix C
Stage One Equality, Diversity and Cohesion Impact
Assessment – Identifying the Priority

Strategy/Policy/Service Standard:

Interim Confidentiality Policy

Questions	Yes / No
(If you want to add an explanatory note please do so in this column under each of the numbered questions)	
1. Is there any reason to believe less favourable treatment of equality groups occurs?	No
2. Will/could this issue have a significant impact?	No
3. Does/could work in this area provide an opportunity to reduce discrimination?	No
4. Could work in this area allow key equality groups to be engaged and included in service planning and/or decision making?	No
5. Does/could the issue provide the opportunity to foster good relations between different groups or contribute towards community cohesion?	No
6. Will/could this issue lead to the procurement of services, goods or facilities?	No
7. Could work in this area improve access to employment and services for equality groups?	No

8. Is there any reason to believe user/employee profile is not consistent with community profile?	No
9. Has this issue received a high profile - (Community/Political/Local or National agenda)	No
10. If Equality issues are not addressed is there any potential for adverse impact on particular groups or on the society generally?	No

Decision around priorities

Priority	Number of questions answered ' Yes'	Rating
High	6 – 10	
Medium	3 – 5	
Low	0 – 2	X

- If this is a high priority continue with stage two and three.
- If this is a medium priority take a decision on whether or not to proceed.
- If its low priority, no need to go any further just keep a copy of stage one for future reference.



ROCHDALE BOROUGHWIDE HOUSING

[Type of meeting] MEETING [Date]

CONFIDENTIAL AGENDA ITEM

For: *[Group with access to document]*

Agenda Item Number *X*

[Title of Item]

This report is considered a confidential item by virtue of RBH's Openness and Public Disclosure Policy, due to one of the following reasons:

Reason for being confidential

1. The report details personal matters about an identifiable individual (including tenants and employees)
2. The report is in relation to a proposed or pending acquisition of land for RBH purposes
3. The report relates to employment issues
4. The report provides information relating to the financial or business affairs of RBH or a particular individual
5. The report is in relation to litigation or potential litigation affecting RBH
6. The report is in relation to the receiving of advice that is subject to solicitor-client privilege

**Report author to bold or underline the specific reasons for confidentiality*

Schedule 8

MEMBER PROTOCOL

This protocol is intended to promote good practice between the Parties. It does not represent a legally binding agreement between the Parties.

1. Introduction : The Underlying Principles

- 1.1 The purpose of this protocol is to guide employees of RBH and members of the Council ('Councillors') in their dealings with one another.
- 1.2 The protocol does not seek to be either prescriptive or comprehensive. It seeks simply to offer guidance on some of the issues that most commonly arise.
- 1.3 RBH, through its acceptance of the 'offer document', has agreed to deal with Councillors' enquiries made on behalf of RBH customers who have problems they wish to have resolved.

2. Councillors' Access to Information

- 2.1 RBH acknowledges the right of Councillors (subject to any relevant data protection legislation restrictions and confidentiality requirements) to inspect documents if access to those documents is reasonably necessary to enable Councillors properly to perform their duties. Councillors should demonstrate that they have a 'need to know', mere curiosity is not enough.
- 2.2 RBH information provided to Councillors pursuant to Paragraph 2.1 of this Schedule 8 must only be used by them for the purpose for which it was provided, namely in connection with their duties as Councillors, unless the information is already in the public domain. Breaches of confidence will be reported for investigation under the Councillors' Code of Conduct.

3. Ward Roles

- 3.1 All Councillors have a vitally important role to play as representatives of their wards and communities and may expect support from RBH in terms of positive responses to requests for information necessary to deal with ward matters.
- 3.2 Such enquiries should be responded to within 7 days however if the matter raised is not capable of a full response then an informative holding reply should be sent within that period setting out the timescales within which a full reply is expected to be made.
- 3.3 Clearly, RBH must not give any person preferential treatment simply because he has taken a matter up with a Councillor. However, if the application of RBH policy would cause unreasonable hardship, or would have some consequence which may not have been foreseen when the policy was drawn up, it is proper and reasonable for the matter to be drawn to the attention of the relevant RBH strategic employee, who will then consider how the matter should be pursued.
- 3.4 Protocols have been drawn up to cover a number of specific situations relating to Councillors in the ward role. These are
 - consultation of Ward Councillors (Appendix 1)
 - public meetings (Appendix 2)
 - candidates at local elections (Appendix 3)
 - Parliamentary candidates (Appendix 4).

4. Press Releases

- 4.1 Official press releases will give proper weight to the respective roles of RBH, the Council and relevant Councillors (where applicable).

- 4.2 Any official publicity issued by RBH on behalf of the Council must take into account the need to allow for the requirements imposed on the Council and Councillors by the Code of Recommended Practice on Local Authority Publicity issued under the Local Government Act 1986.

APPENDIX 1

Consultation of Ward Councillors

1. From time to time RBH may consult Ward Councillors on matters affecting their wards which require to go to the RBH Board of Management or one of its committees for a decision.
2. The purpose of consulting Ward Councillors is:
 - to make them aware of issues affecting their Wards so that wherever possible, they receive this information before hearing it from sources other than RBH or the Council;
 - to obtain information from Ward Councillors on the matter;
 - to ensure that their views are recorded and taken into account.
3. Where RBH consults Ward Councillors pursuant to paragraph 1 of this Appendix 1 the employee responsible for the consultation should establish personal contact with the Ward Councillor and should make a written record of the consultation. If more than one RBH employee is involved, the relevant strategic employee(s) should be clear about who is taking responsibility for ensuring that the requirements of this protocol are met.

APPENDIX 2

Public meetings

1. Public meetings are a valuable means of consulting on issues of local concern. They can provide RBH with a means of explaining its position and allowing local people to understand the issues concerned.
2. RBH may conduct public meetings on its own initiative or in response to requests for meetings from Ward Councillors or other individuals and interested groups. Normally these requests should not cause a difficulty but occasionally the issues involved could raise local sensitivities particularly in wards where there is mixed political representation on the Council.
3. To ensure a consistent approach and avoid any possibility of misunderstanding roles, Ward Councillor's requests for public meetings should be directed to RBH's Chief Executive who will consider the request in consultation with the Chairman of the Board of Management, before ensuring that there is no conflict of interest with the Council. Subject to these conditions being satisfactorily met, the appropriate employee would be responsible for agreeing with the Council how arrangements are to be made and by whom, in relation to booking and paying for accommodation and for attendance by relevant RBH employees and Council officers.
4. RBH will consult with the Council on any public meetings where the Council has a particular interest or involvement and will try to avoid having public meetings during a period between publication of a Notice of Election for a Ward or Parliamentary constituency in Rochdale and election day, this is known as the 'Purdah period' if holding a public meeting would curtail the Council's ability to be able to participate fully.

APPENDIX 3

Candidates at local elections

1. This note gives advice to RBH employees on dealing with requests for advice or assistance from people who are standing as candidates at local elections in Rochdale, whether by-elections or the annual municipal elections.
2. If a candidate asks for advice or assistance on a matter relating to a constituent or affecting an area of the Ward, the request should be treated as if it was coming from an individual on behalf of a constituent. It should be dealt with like any other such request that is with courtesy and an attempt to help.
3. Where the candidate says that the matter has been raised by a constituent or constituents, he should be informed that RBH will look into the matter and if the candidate provides the name of the constituent who has raised it, RBH will write to them directly. If the issue is one of more than individual concern, such as a complaint about the maintenance of an area of open space on a housing estate, the response should also say that RBH will liaise with the Council in order to inform the Ward Councillors and discuss it with them. This is not required where the issue relates to one individual or household, for example a repair request.
4. Sometimes a candidate may raise a matter apparently on his own initiative and without making any reference to it having been raised by constituents. In this case, RBH should deal with it in the normal way and respond to the candidate as to anyone else who has requested assistance or information. It will not be necessary to inform the Ward Councillor unless the matter is judged to be particularly significant.
5. No preference should be given to any one candidate's request and no personal or confidential information should be given to candidates (for the avoidance of doubt, this includes the information to which the data protection legislation applies).
6. The situation is somewhat different when one of the Ward Councillors is himself a candidate at the election. In this case, he remains the Ward Councillor until the date of retirement (the fourth day after the election) and should continue to be treated as such. This means, in particular, that if the Ward Councillor raises an issue on behalf of constituents RBH will correspond with him directly and without involving other Ward Councillors.

There are sometimes circumstances where no election has yet been called but individuals hold themselves out as being candidates. In this situation, the same rules apply.

APPENDIX 4

Parliamentary candidates

1. Once Parliament has been dissolved all former Members of Parliament (MPs) become parliamentary candidates who should all be treated the same.
2. Requests from parliamentary candidates for advice or assistance for a constituent should be processed in the normal way. No personal or confidential information should be given to candidates. As candidates are no longer MPs a request should be treated as if it were coming from an individual on behalf of a constituent. It should be dealt with as RBH would deal with any such request that is with courtesy and an attempt to help. RBH should indicate that they are going to look into the matter and if the candidate will provide the name of the constituent who has raised it, RBH will write to him direct. Where the matter has been raised by the candidate apparently on his own initiative, without reference to constituents, RBH should respond direct to the candidate.
3. The situation is somewhat different when a serving councillor for a ward in Rochdale stands as a parliamentary candidate for a constituency which covers his ward. In that case, the councillor should continue to be treated as the Ward Councillor in relation to any matter relating to his ward; if he raises an issue on behalf of constituents in the Ward, RBH will correspond with him direct. However, if the issue does not relate to the Councillor's Ward, it should be treated as if it had been raised by any other candidate and dealt with as set out in paragraph 2 of this Appendix 4.