



Lochaber Housing Association Group Model Publication Scheme and Guide to Information 2024

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1. Terms used

| Term Used | Explanation |
|--------------------------|--|
| FOISA | The Freedom of Information (Scotland) Act 2002 |
| EIRs | The Environmental Information (Scotland) Regulations 2004 |
| SIC | The Scottish Information Commissioner |
| Model Publication Scheme | A standard framework for authorities to publish information under FOISA approved by the Scottish Information Commissioner |
| MPS | The Model Publication Scheme |
| Guide to Information | A guide that every public authority adopting the MPS must produce to help people access the information it makes available |
| Classes of Information | Nine broad categories describing the types of information authorities must publish (if they hold it) |

2. About Lochaber Housing Association Group

Lochaber Housing Association is a Scottish Charity (SCO 30951), registered as a Society under the Co-operative and Community Benefits Act 2014, and is registered with The Scottish Housing Regulator (Registered Social Landlord No. 151).

The Association was established in 1988. Our principal objective since 1988 has been to provide good quality, truly affordable housing opportunities and services for local people in their preferred communities. The Association has achieved this historically by accessing public funding, mainly through the Scottish Government as well as private sector lending facilities, to develop and manage housing, mainly for rent but also through low cost home ownership accommodation and other initiatives. Since our inception, we have provided over



900 new housing opportunities for rent and low-cost home ownership. We also factor 246 other properties and have two subsidiary companies: Lochaber Care and Repair Ltd., and LHA Property Services CIC.

Lochaber Care & Repair and Handyman Service help people in Lochaber who are older or have a disability, by providing free and confidential advice, support and practical assistance so they can continue living in safety and comfort at home within their own communities.

LHA Property Services, a Community Interest Company, provides cost effective, efficient and quality maintenance and improvement services to the homes of tenants of Lochaber Housing Association, as well as providing employment and training opportunities for local people.

Our Mission

"we will facilitate the provision and maintenance of good quality, truly affordable housing opportunities and services for our customers in their preferred communities, thereby helping to sustain and develop thriving communities throughout Lochaber".

Our Values

- **Teamwork** *we listen to and have regard for one another while working together to achieve results*
- **Respect** *we understand and consider the views of others and work collaboratively*
- **Commitment** *we always strive to work with urgency and dedication to deliver services for the LHA Group*
- **Communication** *we communicate with one another effectively, openly and as frequently as necessary to enable us to deliver excellent services.*



Our Board

Responsibility for running the Association lies with a voluntary Board of Management, which is elected from a board membership of local people drawn from a diverse range of backgrounds including tenant members. The Board is responsible for providing strategic leadership and direction for the Association, and leads in the planning, governance, monitoring and control of the delivery of services to our tenants and service users. The Board works closely with the management team to achieve these aims.

Organisational Structure

The Board of Management meets eight times a year with the Senior Management Team. Decisions are taken to set the overall strategy for the Association as well as to monitor its activities. The Senior Management Team are charged with the task of implementing their decisions.

3. Introduction to Lochaber Housing Association Group's Guide to Information

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.

Lochaber Housing Association Group has adopted the Scottish Information Commissioner's (SIC) Model Publication Scheme (MPS), and this Guide has been approved by the SIC.



4. Formats other than online and Charging Schedule

This section explains when we may make a charge for our publications and how any charge will be calculated. There is no charge to view information on our website or at our premises. We may charge for providing information to you, but we will charge you no more than it costs us to do so. We will always tell you what the cost is before providing the information to you. Our photocopying charge per side of paper is shown in the tables below:

Black and White Photocopying

| Size of Paper | Pence per sheet |
|---------------|-----------------|
| A4 | 10p |
| A3 | 20p |

Colour Photocopying

| Size of Paper | Pence per sheet |
|---------------|-----------------|
| A4 | 20p |
| A3 | 40p |

Postage Costs

Postage costs may be recharged at the rate we paid to send the information to you. Our charge is for sending information by Royal Mail First Class.



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 (un-published information)

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:

- 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.



Charges for Environmental Information

The rules for charging for environmental information are slightly different because requests for Environmental Information is provided under the EIRs rather than FOISA. Under the EIRs, we may impose a charge of a reasonable amount for making Environmental Information available to you.

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 Lochaber Housing Association Group of providing the information:

- Photocopying is charged at 10p per A4 and 20p per A3 sheet for black and white copying, 20p per A4 and 40p per A3 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.

Charges for requesting your own personal data (Subject Access Requests)

There is no charge for requesting your own personal data under the General Data Protection Regulation (GDPR) Subject Access Request. We will 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.

5. Information 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 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.

6. 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.

7. 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

8. 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:

Lochaber Housing Association

101 High Street

Fort William

PH33 6DG

Email: foi@lochaberhousing.org.uk

Telephone: 01397 702530

Website: www.lochaberhousing.org.uk

9. Classes of Information

We publish all the information that we hold within the following classes. Once information is published under a class, we will continue to make it available for the current and previous two financial years.

Class 1: About Lochaber Housing Association Group

Information about who we are, where to find us, how to contact us, how we are managed and our external relations.

| The information we publish under Class 1 includes: | How to access it |
|---|---|
| Lochaber Housing Association Subsidiaries | Online - About us |
| Who we work with | Online – About us |
| Our Mission Statement and Corporate Objectives | Online - About us |
| Our Vision and Values | Online – About us |
| Corporate Objectives | Online – About us |
| Area of Operation | Online - About us |
| Key Activities | LHA - Online - About Us LHAPS - Online – LHA Property Services LCR - Online - LCR |
| Business Plan | Online – Documents and Downloads |
| Customer Charter | Online – Documents and Downloads |
| Governing Body | LHA Online - Board of Management |



| | |
|--|---|
| | LHAPS - On request LCR - Online - Management Committee |
| How to become a part of the Governing Body | Online – Get involved |
| Contact details and opening hours | Online - Contact |
| How to make a complaint and contact details | Online – Comments and Complaints |
| Model Publication Scheme and Guide to Information | This Guide and Online - FOI |
| Charging Schedule for published information | This Guide and Online - FOI |
| Freedom of Information (FOI) Policies and Procedures | Online - FOI |
| How to make a FOI Request | Online - FOI |
| How to make a Subject Access Request | Online - FOI |
| How to make an Environmental Information Request (EIR) | Online - FOI |
| Charging Schedule for providing information under an EIR | This Guide and Online - FOI |
| Model Rules | Online – About us |
| Standing Orders | Online – Documents and Downloads |
| Membership Policy | Online – Documents and Downloads |
| Code of Conduct for Staff | Online – Documents and Downloads |
| Code of Conduct for Governing Body Members | Online – Documents and Downloads |
| Entitlements, Payments and Benefits Policy | Online – Documents and Downloads |
| Equality, Diversity and Inclusion Policy | Online – Documents and Downloads |
| Health and Safety Policy Statement | Online – Documents and Downloads |
| Register of Interests | On request |
| Engagement Plan with Scottish Housing Regulator | Online - Regulatory |
| Assurance Statement | Online - Regulatory |
| Annual Return on Charter | Online - Scottish Social Housing Charter |
| Financial Returns to Scottish Housing Regulator | Online - Regulatory |
| Charter Report to Tenants | Online - Regulatory |
| SHN Benchmarking Reports | Online - Performance Documents |
| Internal and External Audit Arrangements | Online - Documents and Downloads |



Class 2: How we deliver our functions and services

Information about our work, our strategy and policies for delivering services and information for our service users.

| The information we publish under Class 2 includes: | How to access it |
|---|------------------------------------|
| The services we provide | Online - About us |
| How to report a repair and right to repair | Online – Maintenance and Repairs |
| How to apply for a tenancy | Online – Find a Home |
| Tenancy Support | Online – Manage your Home |
| How to contact Housing Management | Online – Manage your Home |
| How to make a complaint | Online – Comments and Complaints |
| How we consult with tenants and other customers to improve and develop new services | Online – Get Involved |
| Allocations Policy | Online - Highland Housing Register |
| Anti-Social Behaviour Policy | Online – Documents and Downloads |
| Asbestos Management Policy | On request |
| Asset Management Strategy | Online – Documents and Downloads |
| Customer Charter | Online – Documents and Downloads |
| Data Protection Policy | Online – Documents and Downloads |
| Environmental Information Regulations (EIR) Policy | Online – Documents and Downloads |
| Equality, Diversity and Inclusion Policy | Online – Documents and Downloads |
| Estate Management Policy | Online – Documents and Downloads |
| Freedom of Information Policy | Online – Documents and Downloads |
| Health and Safety Policy Statement | Online – Documents and Downloads |
| Housing Information and Advice Policy | Online – Documents and Downloads |
| Keeping of Pets Policy | Online – Documents and Downloads |
| Mutual Exchange Policy | Online – Documents and Downloads |
| Recovery of Property (non arrears) Policy | Online – Documents and Downloads |
| Rent Setting Policy | Online – Documents and Downloads |
| Rent Arrears Policy | Online – Documents and Downloads |
| Repairs and Maintenance Policy | Online – Documents and Downloads |
| Risk Management Policy | Online – Documents and Downloads |
| Scottish Secure Tenancy Assignations Policy | Online – Documents and Downloads |



Class 3: How we take decisions and what we have decided

Information about the decisions we take, how we make decisions and how we involve others.

| The information we publish under Class 3 includes: | How to access it |
|---|--|
| Governing Body agendas | On request |
| Governing Body meeting minutes | LHA - Online – Documents and Downloads LHAPS and LCR - On request |
| Governing Body meeting reports | On request |
| Tenant Communication and Engagement Strategy | Online – Get Involved |
| Tenant Consultation Reports | On request |
| Tenant Scrutiny Panel | Online – Get Involved |
| Registered tenant organisations | Online – Get Involved |

Class 4: What we spend and how we spend it

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).

| The information we publish under Class 4 includes: | How to access it |
|---|--|
| Our sources of funding | LHA - Online - Documents and Downloads Business Plan LHAPS and LCR N/A |
| Budget policies and procedures (Financial Regulations) | Online – Documents and Downloads |
| Audited Accounts | Online – Documents and Downloads Corporate Governance LHAPS - On request LCR - On request |
| Project funding | On request |
| Capital works programme | On request |
| Travel and Subsistence Policy | Online – Documents and Downloads |
| Senior Staff / Governing Body Member expenses | On request |
| Board member remuneration (other than expenses) | On request |
| Pay and grading structure | Online - EVH |
| Pension Scheme | Online - TPT Pensions |



Class 5: How we manage our resources

Information about how we manage our human, physical and information resources.

| The information we publish under Class 5 includes: | How to access it |
|---|---|
| Staffing Structure | LHA - Online - Our staff LHAPS - On request LCR - Our staff |
| Salary and grading | Online - EVH |
| Pensions | Online - TPT Pensions |
| Recruitment and Selection Policy | Online – Documents and Downloads |
| Training and Development Policy | Online – Documents and Downloads |
| Trade Unions | Online - Unite |
| Summary of professional organisations/trade bodies | Online – About Us |
| Records Management Policy | Online – Documents and Downloads |
| Document Retention Schedule | On request |
| Data Protection and Privacy Policy | Online – Documents and Downloads |
| Management of our land and property assets | On request |
| Land and property holdings | On request |
| Estate development plans | Online - Development |

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.

| The information we publish under Class 6 includes: | How to access it |
|---|------------------------------------|
| Information on how to tender for work | On request |
| Public Contracts Scotland Notices | Online - Public Contracts Scotland |
| Regulated procurement contracts awarded | Online - Public Contracts Scotland |
| Key service delivery contractors | On request |
| Suppliers and contractors used by LHA Group | On request |
| Contracts Register | On request |
| Framework agreements | Online - Cirrus Purchasing |



Class 7: How we are performing

Information about how we perform as an organisation and how well we deliver our functions and services.

| The information we publish under Class 7 includes: | How to access it |
|---|----------------------------------|
| Annual Report (Tenant Talk) | Online - Performance Documents |
| ARC Report to tenants | Online - SHR landlord page |
| Performance Reports | Online - Performance Documents |
| Benchmarking information | Online - Performance Documents |
| Complaints Policy and guidance | Online - Comments and Complaints |
| Complaints reports | Online - Comments and Complaints |
| Tenant Scrutiny reports | On request |
| Newsletters and Housing Briefs | Online - Newsletters and Briefs |

Class 8: Our Commercial Publications

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.

This class does not apply to Lochaber Housing Association as we do not produce any publications for sale.

Class 9: Our Open Data

Open data made available by us under Scottish Government's Open Data Resource Pack and available under open licence.

This class does not apply to Lochaber Housing Association Group.