

Openness and Transparency Policy

- 1. Policy statement** We want to be **open** and **honest** with our customers, colleagues and everyone we work with.

We want to:



Set an example of good business practice by explaining **what** we do and **why** we do it and by **taking responsibility** for our actions;



Explain our decisions and show people that we're **careful** about how we spend money and that we spend it wisely;



Create business relationships based on **mutual trust and respect** so people **want to work with us** or **be our customer**.



Set an **example for our sector** by sharing as much information as we can and, where possible, **more** than we're legally required to.

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- 2. Contents:** Part 1 – Openness and Transparency at Bromford
Part 2 – Information we share

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- 3. Reference Documents including links** [UK Corporate Governance Code](#)

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- 4. Legislative Requirements including links** [Data Protection Act 1998](#)
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PART 1: OPENNESS AND TRANSPARENCY AT BROMFORD

Why is this important?

We believe being open and transparent is **important** – not only because it helps deliver **fair, efficient, and effective** customer service but because sharing information about **what** we do and **why** we do it helps colleagues and customers to be the **best they can be**.

In the face of social and economic change, we want to **lead by example** – to **influence the debate** around transparency in our sector and make sure it's relevant, meaningful and cost-effective to deliver.

See **Part 2** of this guide for a full list of the information we share.

What type of information do we share?

Here at Bromford we share two types of information:

1. Information we **have** to share – to comply with law or regulation; and
2. Information we **choose** to share – to help customers and colleagues understand what we do and why we do it.

Overall, we aim to share **more** information than we legally have to.

Things we **must** share under law or regulation include:

- How much our **board members and Chief Executive get paid**. This is published this in our Annual Report and Accounts to comply with Financial Reporting Council (FRC) guidelines.
- Details of our **performance standards and commitment to obtaining value for money**. The Homes & Communities Agency (HCA) asks us to publish this information to help our customers and stakeholders see how we're managing homes and assets.
- The **code of governance** we use. Here at Bromford we use the UK Corporate Governance Code, a set of guidelines which help Boards structure themselves, and make decisions, effectively. We have to make statements about how we have complied with the Code in our Annual Report and Accounts.
- Details of **payments over £500** made to suppliers. The HCA ask us to publish this information in connection with the grant funded building programme in return for providing us with grant funding. In addition, we choose to publish all our other payments over £500.

How do we decide what to share?

When deciding whether to share a piece of information, we think about:

- **who** will find it useful;
- **how** we'll share it, so it can be accessed by everyone who needs or wants to see it;
- **how much** it'll cost to share it – will it be a good use of money?;
- whether anyone could be **upset** or **harmed** by it;
- whether it contains **confidential business information**;
- what the **Data Protection Act 1998** will let us legally share.

The Data Protection Act 1998

Bromford must follow the Data Protection Act 1998, which sets out **what** information we can legally share and **how** we should do it. We also have a set of **policies and ‘How To’ guides** to help colleagues understand their responsibilities.

In some circumstances we may need to limit the amount of information we can share because of our legal duty to keep personal information **private** and **confidential**.

The Freedom of Information Act 2000

The **Freedom of Information Act 2000** (or FOIA) only applies to public bodies (such as local authorities) and does **not** apply to Bromford.

However, if we’re sub-contracted to carry out work on behalf of an organisation that is subject to FOIA, that organisation **may** ask us to supply information about the work we’re doing for them so that they can respond to a FOIA request.

PART 2: INFORMATION WE SHARE

What we share & where you can find it

Information we share	Where it can be found
Remuneration Information	
Details of Executive Remuneration (CEO & Execs)	<ul style="list-style-type: none"> • Bromford website • Annual Report & Accounts (copy on Bromford website)
Colleague Salary Bands	<ul style="list-style-type: none"> • Bromford website
Non-Executive Director Remuneration (by role)	<ul style="list-style-type: none"> • Bromford website
Expense Policy	<ul style="list-style-type: none"> • Bromford Website • Intranet (Our Space)
Expense payments made to Non-Executive Directors & Executives	<ul style="list-style-type: none"> • Bromford website
Recruitment Information	
How we recruit Colleagues	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
How we recruit Board Members	<ul style="list-style-type: none"> • Bromford website
Performance Management Policy	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
Financial Information and Value for Money	
Details of all expenditure over £500	<ul style="list-style-type: none"> • Bromford website
Procurement Policy	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
How we award contracts	<ul style="list-style-type: none"> • Bromford website

Value for Money Policy	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
Rent and service charge setting	<ul style="list-style-type: none"> • Bromford website
Annual Report and accounts (which includes UK Corporate Governance Code disclosures)	<ul style="list-style-type: none"> • Bromford website
Service and Performance	
Access to our homes and services	<ul style="list-style-type: none"> • Bromford website
Customer Annual Review	<ul style="list-style-type: none"> • Bromford website
Complaints Policy	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
Governance	
Governance Framework	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
Members of the Board and Board Committees	<ul style="list-style-type: none"> • Bromford website • Annual Report & Accounts (Copy available on Bromford website)
Customer influence and engagement	<ul style="list-style-type: none"> • Bromford website
Probity Policy	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
Equality and Diversity Policy	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)
Strategy	
Statement of Strategy	<ul style="list-style-type: none"> • Bromford website • Intranet (Our Space)

Scope

This policy applies to all **colleagues** and **board members**.

Monitoring & Amendment

This policy is approved by the **Group Board**, who will review it every two years.