

gentoo



**Openness and
Transparency**

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For support and advice regarding the policy, please contact the Policy Owner. For queries on the policy register, please contact the Governance Team.

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Policy Statement

- Gentoo is committed to being open, transparent and accountable to its customers and stakeholders. We recognise that access to clear, accurate and timely information supports trust, meaningful engagement and effective scrutiny of our services.
- Openness and transparency are fundamental to good governance and support how Gentoo is directed, managed and controlled. They strengthen accountability, encourage customer influence and help ensure that decisions are informed by the views and experiences of customers.
- This policy sets out Gentoo's strategic approach to openness and transparency, including how it will meet its obligations under the Social Tenant Access to Information Requirements (STAIRs).
- The policy establishes the arrangements for:
 - proactively publishing information through a publication scheme
 - responding to information requests from social housing customers
 - managing complaints relating to information requests
 - engaging customers in the development and review of transparency arrangements.
- Gentoo's approach is based on the following principles:
 - Openness and transparency are essential components of effective governance, leadership and accountability.
 - Customers should have access to relevant information about the management of their homes and services.
 - Information should be easy to find, accessible, relevant, accurate and presented in a format that meets the diverse needs of customers.
 - Gentoo will be accountable to customers and other stakeholders through the proactive publication of information about its performance, decision-making and use of resources.
 - Decisions to withhold or redact information will be lawful, reasonable and clearly explained.
 - Transparency arrangements will support regulatory compliance, effective risk management and customer trust.
 - Arrangements will be monitored, reviewed and continually improved through learning, assurance activity and customer feedback.

Equity, Diversity, Inclusion and Belonging

- We are committed to the principles of equity, diversity, inclusion and belonging throughout the organisation and aim to:
 - Treat everyone equally, fairly, and with respect.
 - Provide fair and equitable outcomes for colleagues and customers.

- Welcome and value difference and not tolerate discrimination, harassment or victimisation of any individual or groups.
- Challenge the behaviour of those who do not uphold our values and go against our principles.
- Oppose and avoid all forms of unlawful discrimination. This includes pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training, or other developmental opportunities.
- We are committed to the principle of diversity and inclusion for all colleagues and customers, regardless of sex, race, religion or belief, age, marriage and civil partnership, pregnancy and maternity, sexual orientation, gender reassignment, or disability.
- This policy and the associated procedures (if applicable) will ensure that customers and colleagues are treated as individuals with fairness and respect. An Equality Assessment has been completed on this policy.

Scope, Escalation and Monitoring

Scope

- This policy applies to information held by Gentoo which relates to the management of its social housing activities. This includes information held directly by Gentoo and relevant information held on its behalf by organisations responsible for delivering social housing services.
- This policy applies to:
 - social housing customers of Gentoo
 - a social housing customer's nominated or designated representative.
- The policy does not provide a general right of access to information for members of the public.

Escalation

- Where the Board or a Committee has concerns about significant issues in any area of this policy, they must escalate these concerns to the Executive Director of Regulatory and Business Services.
- Where a colleague has concerns about significant issues in any area of this policy, they must escalate these concerns through their line management structure, and ultimately to the Executive Team.

- Where a colleague continues to have concerns about significant issues in any area of this policy, they should refer to the whistleblowing section within the Group's Working Professionally Policy, which can be found on the Policy Hub on the Gentoo Intranet.

Monitoring

- This policy will be reviewed annually, unless business needs or legislative changes dictate that we review it before this time.
- This policy may be subject to an audit in line with the internal audit plan.
- This policy is a grade 1 and changes will need the approval of the Group Board.

Core Purpose, Vision and Themes

- Our core purpose is to provide warm, safe and decent home for our customers of today and tomorrow.
- Our vision is to become the best provider of social homes in the country.
- Our values are what we stand for and what we want to be known for. They are what makes us, us.
 - We care about people.
 - We take accountability.
 - We shape the future.
 - We bring leadership.
 - We deliver.
- We live our values in everything we do from the boardroom to the front room, to deliver our priorities for our customers.
- We have identified six themes which will guide the delivery of our services and support the Group's vision and ambitions for the next 10 years.
 - The best provider of social homes in the country.
 - A housing provider that listens and sorts things out.
 - Helping our communities to thrive.
 - Achieving growth through partnerships and innovation.
 - A professional, caring, great place to work.
 - Embracing modern technology and data.

Regulation and Legislation

- The Company Secretary and General Counsel will ensure this policy has regard to all legislation, regulation and best practice. The regulations and legislations applicable to this policy are:
 - Social Housing Regulation Act 2023.
 - Freedom of Information Act 2000.
 - Data Protection Act 2018.
- The policy reflects the requirements set out in the government's Social Tenant Access to Information Requirements policy statement and supports the delivery of the Transparency, Influence and Accountability consumer standard.

Roles and Responsibilities

- The key roles and responsibilities in Gentoo for this policy are set out below. If applicable, additional responsibilities for this policy are detailed in the relevant supporting procedures.

Role	Key responsibilities
Group Board	Accountable for approving Gentoo's Openness and Transparency Policy and promoting a culture of openness, transparency and accountability across the organisation.
Executive Director of Regulatory and Business Services	Responsible for ensuring Gentoo maintains an effective policy for openness and transparency, and for seeking assurance that policy requirements, including STAIRs obligations, are being implemented and complied with in practice.
Director of Marketing and Communications	Responsible for ensuring information published by Gentoo, including information required under STAIRs and the publication scheme, is accurate, accessible, timely and available in formats appropriate to the diverse needs of customers.
Company Secretary and General Counsel	Responsible for ensuring information requests are managed and responded to in accordance with this policy, the requirements of STAIRs, and any applicable legal, regulatory or governance requirements.
Head of Customer Voice and Engagement	Responsible for ensuring customers are informed, engaged and consulted on Gentoo's approach to openness and transparency, including STAIRs

Role	Key responsibilities
	arrangements, and for ensuring suitable arrangements are maintained for the review of and response to complaints relating to information requests and publication scheme matters.

Definitions

- The following definitions are used throughout this policy:

Term	Definition
Relevant information	- Information related to the management of the Group's social housing. This may include details of policies, plans and actions carried out in the management of social housing, and information captured and retained to support these activities. - Examples of relevant information may include, but are not limited to: - The handling of property moves - Rent collection - Rent rates - Service charges for shared owners - Occupancy rights - Estate management, management of communal areas and boundary issues - Property conditions, repairs, and improvements to property - Anti-Social Behaviour - Staffing and training - Complaints handling, procedures and performance - Compensation and redress - Communication and customer service - Health and safety - Data handling and privacy - Security - Housing stock transfers and mergers - Housing stock profile - Environmental and energy efficiency information
Applicant	A customer or a designated representative nominated by the customer to communicate with the Group on their behalf, who submits a request for information.

Associated Procedures and Processes

- This policy should be read alongside the Group's Openness and Transparency Policy, and Data Protection Policy.

Policy Detail

Publication Scheme

- The Director of Marketing and Communications shall ensure that Gentoo establishes, maintains and operates a publication scheme which meets the requirements of STAIRs and supports Gentoo's wider commitment to openness and transparency.
- The publication scheme shall:
 - identify information routinely published by Gentoo
 - explain how that information can be accessed
 - be reviewed regularly to ensure information remains accurate, relevant and up to date
 - be presented in a format that is accessible and appropriate to the diverse needs of customers.
- Gentoo will proactively publish information within the following classes.

Class of information	Information typically included
Governance and decision-making	• governance structures and arrangements • Board, committee and Executive Team information • Board member biographies • key governance documents • customer consultation and engagement activity • public Board and Committee agendas, papers and minutes where appropriate.
Spending	• annual reports and financial statements • value for money information • spending and investment information relating to social housing services • procurement and contract information where appropriate • rent and service charge information.
Housing stock management and investment	• asset management strategies • planned maintenance and investment programmes • stock condition information • environmental sustainability and net zero activity • stock transfer information • property improvement programmes.
Performance	• Tenant Satisfaction Measures • customer annual reports

Class of information	Information typically included
	- complaints performance information - Housing Ombudsman determinations - regulatory judgements - health and safety performance information - assurance and audit reports where appropriate - information request performance.
Housing services	- service standards - customer guidance - policies relating to housing services - information about how services can be accessed.
Lists and registers	Information held in registers required by law and other lists and registers relating to the management of social housing.
Social housing management activities	Policies relating to the management of social housing.

- Gentoo is not required to create new records for the purposes of the publication scheme and may apply redactions where permitted.

Information Requests Under STAIRs

- The Company Secretary and General Counsel shall ensure that suitable arrangements are maintained to receive, manage and respond to requests for relevant information from customers and their designated representatives.
- Customers must identify their designated representative to the Group to enable them to make a request on their behalf.
- Requests for relevant information:
 - must be made in writing
 - must enable the applicant to be identified
 - must describe the information requested with sufficient clarity
 - do not need to refer specifically to STAIRs.
- Where appropriate, Gentoo may provide information through normal service delivery arrangements rather than a formal STAIRs process. Customers retain the right to request a formal response where they are dissatisfied with the information provided.

Processing Requests

- Gentoo shall fulfil requests for relevant information unless it is reasonable to withhold that information.
- If the information requested is held by a third party responsible for the management of a customer's housing on behalf of Gentoo, Gentoo shall use all reasonable endeavours to obtain the information and fulfil the request.

- Gentoo is not required to create new information or records in order to comply with the requirements of this policy. However, information already held by Gentoo may be collated, filtered or presented in a different format where necessary to provide an accessible response.
- Gentoo must not destroy, manipulate or alter information with the intention of preventing disclosure.
- Gentoo is not required to disclose information that can be accessed through another statutory regime. In such circumstances, Gentoo shall make reasonable efforts to direct applicants to the appropriate route for obtaining that information.
- Where appropriate, Gentoo may provide information through normal service delivery arrangements rather than a formal information request process. Customers shall retain the right to request a formal response where they are dissatisfied with the information provided.
- Gentoo shall maintain suitable records of information requests and responses, including decisions to disclose, withhold or redact information. Gentoo may publish anonymised summaries of information requests and responses where this supports transparency and reduces duplication of requests.

Responding to Information Requests

- Gentoo must respond to an information request promptly and no later than 30 calendar days from receipt of the request.
- Further time may only be taken where it is necessary:
 - to consider whether it is reasonable to withhold the requested information; and/or
 - to arrange access to relevant information held by a contractor or another organisation acting on Gentoo's behalf.
- Where Gentoo requires additional time to respond, the response must be provided within a reasonable timeframe and applicants must be informed at the earliest opportunity. The notification shall explain the reason for the delay and when a response can be expected.
- Gentoo must notify applicants where a request is refused, explaining the reasons for the decision and the applicant's right to request a review.
- Gentoo may redact information where it is reasonable and lawful to do so and shall explain the reason for any redactions when responding to the request.
- Gentoo shall make reasonable efforts to ensure information is disclosed in a format that is accessible to applicants, taking account of their diverse needs and any reasonable adjustments that may be required.
- Gentoo shall signpost applicants to other relevant information resources where Gentoo is aware of them.
- Where communication from an applicant is identifiable as an information request but the information sought is unclear, Gentoo shall make reasonable efforts to assist the applicant in making a clear and valid request.

- Responses shall normally be provided electronically unless an alternative format has been requested or is required to meet the applicant's needs.
- Responses must inform applicants of their right to request a review and, where applicable, their right to escalate complaints relating to information requests to the Housing Ombudsman.

Withholding or Refusing Information

- Gentoo may withhold, redact or refuse information where it is reasonable to do so.
- In reaching a decision, Gentoo will:
 - have due regard to relevant legislation, including data protection legislation and principles reflected in the Freedom of Information Act
 - balance the benefits of disclosure against the likelihood of harm arising from disclosure
 - consider the views of relevant third parties where appropriate.
- Gentoo will not take account of:
 - the identity of the applicant beyond confirming eligibility to make a request
 - the reasons for the request
 - how the information may be used following disclosure.
- Gentoo may refuse requests where:
 - the identity of the applicant cannot be established
 - the request is unclear
 - the information requested does not fall within scope
 - the work required would exceed 18 hours of colleague time
 - the request is repeated
 - the request is offensive, abusive or unreasonable.
- Where information is withheld, redacted or refused, the reasons will be clearly explained.

Information Outside of Scope

- Examples of information that will normally fall outside the scope of this policy include:
 - matters determined by local authorities, including homelessness and housing allocation decisions
 - activities unrelated to the management of social housing
 - market-rent, commercial or non-social housing activities
 - draft working papers and internal deliberations
 - information protected by legal privilege
 - information where disclosure would breach legal obligations or create an unreasonable risk of harm.

Accessibility

- Gentoo will ensure information is available in a way that is clear, accessible and appropriate to customers' needs.
- Information may be provided in alternative formats where reasonably required, including:
 - large print
 - accessible digital formats
 - alternative languages
 - other reasonable adjustments.
- Information published under the publication scheme will normally be available free of charge.

Complaints and Reviews

- An applicant may complain to Gentoo if they are dissatisfied with the handling of, or outcome of, an information request.
- The Head of Customer Voice and Engagement shall ensure that Gentoo establishes, maintains and operates suitable arrangements to respond to complaints relating to openness and transparency and the Social Tenant Access to Information Requirements (STAIRs). These arrangements shall be separate from those operated under Gentoo's Complaints and Compliments Policy and shall be consistent with the one-stage review process established through the Government's Policy Statement on STAIRs.
- An applicant must submit their complaint in writing to the Head of Customer Voice and Engagement.
- Gentoo shall acknowledge receipt of the complaint and make contact with the applicant as soon as possible and normally within five working days of receiving the complaint. The acknowledgement shall be confirmed in writing and the applicant shall be provided with a unique reference number.
- Gentoo shall then undertake a review of the complaint. The purpose of the review is to determine whether:
 - the information request was handled appropriately
 - the response complied with the requirements of this policy
 - information was incorrectly withheld or redacted
 - relevant information has not been published through the publication scheme
 - any service improvements or corrective actions are required.
- Reviews should normally be completed within 30 calendar days of receipt. Where additional time is required, Gentoo shall inform the applicant in writing, explaining the reasons for the delay and when a response can be expected. Any extension shall be reasonable and kept to the minimum necessary.
- Reviews shall be undertaken by an individual who was not responsible for the original decision wherever reasonably practicable.

- Following completion of the review, Gentoo may:
 - uphold the original decision
 - overturn or amend the original decision
 - disclose information that had previously been withheld
 - publish information that had not previously been included within the publication scheme
 - identify service improvements or corrective actions arising from the review.
- The review outcome shall be confirmed in writing and shall clearly explain the reasons for the decision reached.
- If the applicant remains dissatisfied following completion of the review, they may escalate the matter directly to the Housing Ombudsman in accordance with the Housing Ombudsman Scheme. Responses to review requests shall inform applicants of their right to access the Housing Ombudsman Scheme.
- The Housing Ombudsman will not normally consider complaints where the applicant has an alternative source of redress under data protection legislation or another statutory route of appeal or complaint. Where appropriate, Gentoo shall signpost applicants to the relevant alternative route.
- Gentoo shall maintain records of all complaints, reviews, decisions and outcomes relating to information requests and publication scheme matters for the purposes of monitoring, assurance and continuous improvement.

Customer Engagement

- Gentoo will seek customer feedback on its openness and transparency arrangements and will take this feedback into account when reviewing and developing its approach.
- The Head of Customer Voice and Engagement must ensure that:
 - Gentoo takes the necessary steps to inform customers of:
 - this policy
 - how to access published information
 - how to request relevant information
 - how to complain if they are dissatisfied with the handling or outcome of their information request
 - their right to access the Housing Ombudsman Scheme.
 - Gentoo undertakes suitable, meaningful engagement with customers to seek their involvement in the development and implementation of, and any significant changes to, the Group's arrangements for STAIRs
 - communication with and information for tenants on the Group's arrangements for STAIRs is clear, accessible, relevant, timely and appropriate to the diverse needs of customers.

Performance Monitoring, Reporting and Auditing

Board and Committee Key Performance Indicators (KPIs)

- Although no formal performance measures are in place for this Policy, the Company Secretary and General Counsel will monitor its operation and ensure that any significant issues relating to openness and transparency, including compliance with the Social Tenants Access to Information Requirements (STAIRs), are identified and reported. Significant matters, including recurring themes, material complaints, breaches or regulatory concerns, will be reported to the Risk and Audit Committee as part of Gentoo's probity and data governance arrangements, with escalation to the Group Board where necessary.

Internal Audit and Assurance

- The Director of Safety, Risk and Assurance shall ensure that the Group's arrangements for STAIRs are subject to appropriate oversight and assurance. This may include, but not be limited to:
 - being subject to an internal audit in accordance with the Group's internal audit plan
 - being evaluated as part of periodic assessments of compliance with the Regulator of Social Housing's consumer standards

Records

- The Company Secretary and General Counsel shall develop and implement suitable arrangements to ensure all relevant records relating to STAIRs are retained. The records to be retained shall include records of:
 - requests for information
 - all correspondence with applicants during a request for information
 - the outcome of requests for information, including those that the Group refuses
 - complaints relating to the Group's handling or the outcome of information requests

Version Control

- The version control log should be updated as and when the policy is amended using the structure below.

Version history			
Version	Amendment details	Revised by	Date

0.1	Initial draft for comment	Angela Tinkler	11/3/18
0.2	Including feedback from GET	Angela Tinkler	14/3/18
0.3	Recovery Committee	Angela Tinkler	05/4/18
1.0	Approved version	Sarah Treadwell	25/5/18
1.1	Amended names to job titles and added accountable Exec Director	Sarah Treadwell	03/9/19
1.2	Job title changes, references to Tenant Voice	Angela Tinkler	05/05/21
1.3	Amended values, priority changes, ownership and added new regulatory reports.	Susan Fulton	1/7/24
2.0	Approved by Group Board	Chloe Appleby	23/07/24
2.1	Policy fully revised to incorporate requirements of Social Tenants Access to Information Rights.	Stephen Flounders	18/09/2026
3.0	Approved by Group Board.	Chloe Appleby	30/09/2026
3.1	Appendix added to list all policies that must be published – Approved by Company Secretary and General Counsel in line with delegation from Group Board in September 2026	Stephen Flounders	20/10/2026

Appendix A

- Gentoo will publish the following policies on the website:
- Corporate Policies/Documents:
 - Bribery Act Statement
 - Domestic Abuse in the Workplace
 - Equity, Diversity and Belonging Policy
 - Gender Pay Gap Information
 - Modern Slavery Statement
 - Board and Committee Register of Interests
 - Working Professionally Policy
- Policies and Procedures
 - Allocations Policy
 - Anti-Fraud Bribery and Corruption Policy
 - Anti-Social Behaviour and Hate Crime Policy
 - Chargeable Repairs Policy
 - Complaints and Compliments Policy
 - Gentoo Code of Conduct
 - Damp and Mould Policy
 - Domestic Abuse Policy
 - Equipment and Adaptations Policy and Procedure
 - Grounds, Trees and Play Area Management Policy
 - Income Management Policy
 - Leasehold Management Policy
 - Neighbourhood Management Policy
 - Openness and Transparency Policy
 - Repairs and Maintenance Policy
 - Safeguarding Adults at Risk Policy
 - Safeguarding Children Policy
 - Market Rent and Rent to Buy Policy
 - Suspensions Policy
 - Tenancy Policy
 - Vulnerability Policy