COMMUNICATIONS POLICY

ORKNEY Housing Association

Written by:	**Chief Executive**	Version:	**5**
Approved by:	**Management Committee**	Date:	**28.01.26**
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1. Background

1.1 The Housing (Scotland) Act 2010 established the Scottish Social Housing Charter and the Scottish Housing Regulator (SHR). We commit to the Charter outcomes on Equalities, Communication and Participation and to the SHR's Regulatory Standards of Governance and Financial Management.

This policy sets out how Orkney Housing Association (OHA) will communicate clearly, accessibly and transparently with tenants, applicants, other customers, partners, funders, the media and staff, and how we will ensure compliance with statutory duties including Freedom of Information and data protection.

1.2 We recognise that we are accountable to our customers and that, as a recipient of public funds, we have a wider accountability to the taxpayer.

1.3 We also accept that effective communication with partner agencies, our funders and our internal stakeholders is essential for ensuring the best possible understanding of our aims, objectives and activities.

1.4 We aim to be open about what we do, publish information about our activities and wherever possible agree to requests for information about the work of our Management Committee and our organisation as a whole.

2. Purpose

2.1 The purpose of this Policy is to describe the standards, channels, approvals and responsibilities that ensure our communications are accurate, accessible, inclusive, lawful and support two-way dialogue, scrutiny and continuous improvement.

3. Scope, Regulatory and Good practice framework

3.1 This Policy applies to all staff, committee and any contractor or agents who are involved in preparing or delivering communications on behalf of OHA across all channels (print, digital, social, broadcast and events).

3.2 Related policies are:

- Customer Engagement
- Data Protection & Privacy Policy
- Publication Framework
- Tenant Participation Strategy
- Complaints
- Email, Internet & Social Media Acceptable Use Policy
- Unacceptable Actions Policy
- Codes of Conduct

3.3 In producing this policy, we consider current Legal and Regulatory requirements and guidance, along with other sectoral good practice. This includes:

- The Scottish Social Housing Charter (revised November 2022): Outcomes 1 Equalities; 2 Communication; 3 Participation.
- SHR Regulatory Framework (2024) and Regulatory Standards of Governance & Financial Management – especially Standard 2 (openness & accountability).
- SHR Statutory Guidance: Tenant Consultation and Approval (Feb 2024).
- Annual Assurance Statement (AAS) statutory guidance – and our commitment to publish our AAS and performance information for tenants each year.
- Freedom of Information (Scotland) Act 2002 (Designation of RSLs) Order 2019 – FOI requirements apply to specific RSL functions that we undertake.
- UK GDPR & Data Protection Act 2018; and PECR for electronic marketing (email/SMS/cookies).
- SPSO Model Complaints Handling Procedure (revised 2021).
- Accessibility: we aim to meet WCAG 2.2 AA for web content and provide reasonable alternative formats on request.

4. Target audiences

4.1 Our key external target audiences are:

- Tenant and (sharing) owners
- Applicants
- Partner organisations
- Our funders, including Orkney Community Housing Bond holders
- The communities where we provide services
- The Scottish Housing Regulator
- The Scottish Housing Sector
- The Scottish Government

4.2 Our internal audiences comprise staff, committee members and any subsidiary companies.

5. Communication Standards

5.1 All communications (except where otherwise prescribed) will be:

- Worded in clear, plain English. Accessible and jargon-free.
- Accurate and balanced.
- Accessible, in a format or medium suited to the needs of the target audience. Alternative formats/languages will be available on request and we will provide BSL/interpretation when reasonably required.
- Digital first, but inclusive to meet individual needs.
- Designed to encourage two-way dialogue wherever possible.
- Open and honest (consistent with personal and commercial confidentiality).
- Timely and relevant.
- Courteous, respectful and sensitive.

6. Information to be communicated

6.1 The key information which will be communicated is:

- How to access services, and service standards.
- Changes to services and how to influence them.
- Organisational aims, decisions and performance (incl ARC results, Landlord Report, Annual Assurance Statement).
- Complaints, Compliments and learning from feedback.
- Management Committee minutes and Updates (subject to confidentiality) in line with SHR best practice.
- Annual Assurance Statement which will determine our self-assessment against Regulatory Requirements & Standards.

6.2 Communications planning is a standing item for the Leadership Team. They are responsible for planning activity (events, newsletters, annual report, digital campaigns) and for monitoring and improving engagement.

Minutes of Management Committee meetings will be recorded and published promptly in line with recommended practice. Risk, approvals and crisis protocols apply.

6.3 In the interest of openness and transparency, wherever possible requests for information will be granted subject to compliance with Data Protection and Freedom of Information legislative requirements.

7. Methods & Channels

7.1 Methods of external communication may include:

- Website and online services - tenant portals, email and e-newsletters, SMS or WhatsApp messages.

- Social media (eg Facebook, X/Twitter, Instagram, LinkedIn) – moderated in line with our Social Media Guidance.
- Printed letters/notices – newsletters, posters, mailings.
- Surveys and consultations.
- Proactive publication - AAS, ARC/Landlord Report, Committee/Board minutes, Guide to Information (FOI).
- Events
- Talks/Presentations
- Radio interviews
- TV interviews
- Estate walkabouts
- Films

7.2 The selected method will be consistent with the subject matter and the needs of the target audience.

7.3 Internal communications, in addition to those required under employment law, will include:

- Monthly Staff Planning Meetings attended by all staff
- Post Leadership Team meeting feedback to staff teams
- Access to committee papers (subject to Data Protection, other legislative, commercial or good practice restrictions)

8. Media Handling, Spokespersons and Responsibilities

8.1 All media or politically sensitive enquiries are routed to the Chief Executive. In their absence, the Head of Corporate Governance, Director of Housing & Operations or Director of Finance may respond. Delegation to subject specialists may be made for non-controversial topics. The Chief Executive must be sighted on all media enquiries and responses. A crisis communications protocol will be enacted for major incidents (safety, emergencies, reputational risk).

All staff	Follow this policy; use plain English; protect data; log consultations and feedback.
Chief Executive	Authorised media spokesperson; overall policy owner.
Head of Corporate Governance/ Directors	Deputise for CE; oversee FOI, publication and governance.
Leadership Team	Leads planning; ensures accessibility/brand; monitors KPIs; maintains any agreed editorial calendar.
Committee Chair/Vice Chair	May act as spokesperson with staff briefing for pre-arranged publicity or major issues.

9. Different Communication Needs

9.1 On request, we will provide key documents in other languages and formats (e.g. large print, audio, Easy Read). We will arrange interpretation/translation via approved providers. We will make reasonable adjustments to ensure no-one is disadvantaged in accessing our services.

10. The Media

10.1 The following media have been identified as particularly relevant to OHA activities:

- Chartered Institute of Housing's Scottish Housing News (enews)
- SFHA Housing Scotland Today (enews)
- The Orcadian
- BBC Radio Orkney

10.2 The Association will maintain good relations with the media and will, wherever possible, respond positively to requests for comments.

10.3 All media enquiries will be referred to the Chief Executive or in their absence, the Head of Corporate Governance. If neither can be contacted they should be referred to the Director of Housing & Operations or Director of Finance who will determine whether they are sufficiently urgent to warrant referral to the Chair/Vice Chair. If they are not, the press will be advised there is no-one available to comment.

11. Monitoring & Review

11.1 This Policy will be reviewed every 5 years or sooner if required due to change in the law, the Charter, SHR regulatory guidance, accessibility standards or good practice.