Group Transparency and Access to Information Policy

Corporate Services

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The Riverside Group Limited Registered office: 2 Estuary Boulevard, Estuary Commerce Park, Liverpool L24 8RF

A charitable Registered Society under the Co-operative and Community Benefit Societies Act 2014 (Reg No 30938R)

1. Purpose

Riverside Group ("Riverside" or "the Group") is committed to the principles of openness, transparency and accountability in the way it delivers its services. This Transparency and Access to Information Policy ("the Policy") sets out how the Group will meet its legal obligations to provide access to information.

Riverside Scotland is designated as a Scottish Public Authority under the Freedom of Information (Scotland) Act 2002 (FOISA) and the Environmental Information (Scotland) Regulations 2004 (EIR). The Group will comply fully with FOISA and EIR, including maintaining a Publication Scheme and responding to information requests within 20 working days.

For its activities in England as private registered providers of social housing (PRPs), the Group will comply with the Social Tenant Access to Information Requirements ("STAIRs") as set out in the Policy Statement issued by the Ministry of Housing, Communities and Local Government on 30 September 2025, and as required by the Regulator of Social Housing's Transparency, Influence and Accountability (TI&A) Consumer Standard. This includes implementing a Publication Scheme from October 2026 and responding to information requests from tenants from April 2027, generally within 30 calendar days.

The Policy provides a general understanding of these obligations, outlines responsibilities, and ensures a consistent approach to transparency across the Group while recognising the distinct legal frameworks applicable in Scotland and England. It also ensures that data protection obligations under the Data Protection Act 2018 and UK GDPR are respected, and that information is provided in accessible formats to meet the diverse needs of tenants, residents and other stakeholders.

2. Scope

This policy applies to all colleagues at Riverside (including relief, agency and contract workers and office holders), involved tenants, contractors, external consultants and agents who process Data on behalf of Riverside.

Where any third-party processes Data on behalf of Riverside we will place contractual obligations on that party to ensure due regard is paid to the aims, objectives and controls set out in this Policy. When appropriate we will carry out due diligence and ongoing monitoring activity to ensure there is no inconsistency in the application of, or contravention of this Policy.

3. Legislation

The following legislation and standards apply to this Policy:

- *Freedom of Information (Scotland) Act 2002 (FOISA)*
- *Environmental Information (Scotland) Regulations 2004 (EIR)*
- *Freedom of Information (Scotland) Act 2002 (Designation of Persons as Scottish Public Authorities) Order 2019*
- *Housing (Scotland) Act 2010 (definition of housing services)*
- *Social Tenant Access to Information Requirements (STAIRs) Policy Statement (MHCLG, September 2025)*
- *Regulator of Social Housing Transparency, Influence and Accountability Standard (as amended)*
- *Data Protection Act 2018 and UK GDPR*

- *Equality Act 2010.*

4. Principles

Riverside is committed to the underlying principles of openness, transparency and accountability that support the TI&A Standard, FOISA, EIR and STAIRs. To this end, the Group will:

- Work with tenants and involved customer groups to identify, review and prioritise information that should be proactively published and to evaluate whether published information is useful, accessible and meaningful.
- Maintain and publish a wide range of information through its Publication Schemes available on its websites and in alternative formats on request.
- For Scottish activities: publish in accordance with the FOISA model publication scheme.
- For English activities: from 1 October 2026, proactively publish information falling within the classes set out in the STAIRs Policy Statement, supported by the National Housing Federation STAIRs model publication scheme guidance.
- Review and update published information through standard planned review cycles, and where themes from information requests or customer feedback indicate that content should be added, amended or clarified.
- Generally, provide published information free of charge.

Responding to Information Requests

- Ensure that all colleagues can recognise and record a request for information and determine which requirement the request is made under
- Provide advice and assistance to individuals, including support for vulnerable tenants to make requests and information in accessible formats free of charge for single copies.
- Respond within 20 working days for FOISA/EIR requests and 30 calendar days for STAIRs requests.
- Only withhold or redact information where reasonable under the relevant exemptions, explaining reasons clearly and applying any required public interest or harm test. Start from a presumption in favour of disclosure.
- For STAIRs, apply the reasonableness test with due regard to FOI and data protection laws, balancing disclosure against likelihood of harm, and considering third party views.
- Keep a disclosure log and ensure information is not deleted or changed to avoid disclosure.

Reviews, Appeals and Complaints

- Offer an internal review process for requesters dissatisfied with their response.
- FOISA/ EIR: escalate to the Scottish Information Commissioner if needed.
- STAIRs: escalate to Housing Ombudsman after internal review if needed.

General

- Comply with any relevant Codes of Practice and guidance.
- Drive continuous improvement through monitoring and learning.
- Use clear language for tenants and requestors by explaining important terms and defining acronyms in full when first used.

5. Further information and support

- *Group Data Protection and Privacy Policy*
- *Group Data Retention Policy*
- *Group Retention Schedules*
- *Data Classification Policy*
- *Social Tenant Access to Information Requirements Operational guidance for registered providers – National Housing Federation*
- *STAIRs Knowledge Articles – Salesforce*
- *FOISA Knowledge Articles – Salesforce*
- *RIC pages – Transparency, FOISA, STAIRs, EIR.*

6. Roles and responsibilities

Chief Officer Corporate Services and Managing Director Riverside Scotland: Overall responsibility for ensuring Riverside meets its statutory obligations, that effective arrangements are in place and periodically reviewed.

Group Head of Transparency (Policy Owner): Responsible for advising Riverside on systems and processes that need to be in place to ensure compliance with this policy, and all associated regulatory or statutory obligations.

Data Protection and AI Governance Business Partners: Will act as principle points of contact for Riversides business directorates, providing expert advice on the application of Transparency and Access to information in their respective business areas.

Data Owners and Stewards: Responsible for the identification and provision of all information within scope of publication schemes and for the provision of information to meet requests for access to information within statutory timeframes.

All Managers/ People leaders: Responsible for development and adaptation of local processes to ensure that they are relevant to specific Directorate / business area needs. Ensuring that any breach of this policy or associated guidelines is reported to the Group Data Protection Officer without undue delay. Ensuring that appropriate education and training is completed by all colleagues.

All colleagues: Have a responsibility to ensure that they comply with this policy and any associated procedures.

7. Risks

The key risks to the successful implementation and operation of this Policy are that information requests may not be recognised, recorded or routed correctly; statutory or policy response times may be missed; disclosure decisions may be applied inconsistently; information may be disclosed or withheld inappropriately; published information may become incomplete or out of date; and tenants, residents or other requesters may experience barriers to accessing information.

These risks will be mitigated through clear policy ownership and defined roles and responsibilities; mandatory awareness and role-specific training; standard operating procedures, knowledge articles and template responses; centralised request logging, case monitoring and escalation arrangements; documented decision-making, quality assurance and pre-disclosure review; accessible communication routes and alternative formats; scheduled review of Publication Scheme content; and routine performance, complaint, appeal and lessons-learned reporting through relevant governance and assurance forums.

8. Appeals and complaints

Complaints, internal reviews and appeals relating to requests for information will be managed in accordance with the relevant obligations, rights of review and escalation routes that apply under each statutory regime, including FOISA, EIR and STAIRs. Riverside will ensure that clear information about these rights is made available through its Group Privacy Notice and relevant Publication Schemes, and that requestors are informed of the applicable review, complaint and appeal routes within responses to requests for information.

This will include explaining how a requestor can seek an internal review where they are dissatisfied with the response received, and how they may escalate their complaint to the relevant regulator, commissioner or ombudsman where this is available under the applicable framework.

9. Monitoring and assurance

Area of assurance	Arrangements to confirm the Policy is achieving its objectives	Governance reporting arrangements
Request recognition, recording and routing	Requests will be logged centrally and monitored to confirm they are identified, categorised and allocated correctly under FOISA, EIR or STAIRs. Knowledge articles, guidance and training will be reviewed to ensure colleagues understand when and how to escalate requests.	Performance and exception reporting will be provided through monthly reporting to the Leadership Team, who will be expected to note trends, failures or where repeated process issues are identified in the provision of information. An annual report will be provided to the Group Audit and Risk Committee
Timeliness and statutory compliance	Compliance with response timescales will be monitored through case tracking, deadline reminders, escalation controls and periodic review of overdue or extended cases.	Regular reporting will include volumes, timeliness, overdue cases, reasons for delay and corrective action. Material risks or sustained underperformance will be escalated through the appropriate risk and assurance reporting route.
Quality and consistency of decisions	A sample of responses, exemptions, redactions and reasonableness decisions will be quality assured to confirm decisions are lawful, consistent, clearly explained and supported by an audit trail.	Quality assurance findings, themes and required improvements will be reported to the policy owner and Leadership Team, with actions tracked to completion.
Publication Scheme and proactive transparency	Publication Scheme content will be subject to scheduled review by named content owners to confirm information remains accurate, current, accessible and aligned with FOISA, EIR and STAIRs requirements.	Updates on Publication Scheme compliance, gaps, overdue reviews and improvement activity will be included in monthly reporting to the Leadership Team.
Customer accessibility and support	Feedback, complaints, accessibility requests and use of alternative formats will be monitored to confirm	Accessibility themes, complaints, barriers and improvement actions will be reported through customer experience, equality and

	tenants, residents and other requesters can access information and receive appropriate advice and assistance.	relevant policy assurance routes as appropriate.
Learning, complaints and continuous improvement	Internal reviews, complaints, appeals, regulator or ombudsman findings and lessons learned will be analysed to identify root causes, process weaknesses and opportunities to improve the Policy and supporting procedures.	Lessons learned and improvement actions will be reported to the policy owner, with significant findings escalated through the Group Audit and Risk Committee.

10. Equality, Diversity and Inclusion

Riverside is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Riverside's Equality, Diversity and Inclusion Policy and has been subject to an Equality Impact Assessment.