

Paragon Housing Association Limited

POLICY	FREEDOM OF INFORMATION (FOI) / GUIDE TO INFORMATION
POLICY AREA	GOVERNANCE
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Background

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. Our Guide to Information is our publication scheme and contains links to where you can find all of the information listed online. You can find our FOISA Web Page here www.paragonha.org.uk/foi

Paragon Housing Association has adopted the Scottish Information Commissioner's (SIC) [Model Publication Scheme \(MPS\)](#), and this Guide has been approved by the SIC.

This policy sets out our Guide to Information and the procedures associated with it. A summary is posted on our web site.

Online Publication

More information on Our Guide to information is published online and can be found at <https://paragonha.org.uk/guide-to-information/>

Document links are in this document at Page 6 [LINK](#)

All of the information listed is available on our website (unless stated), and completely free to access online.

Formats other than online

We understand that not everyone will have online access and where this is the case you can contact us to view this in our office (where this would be convenient). If you would like a printed copy of any of the information listed, unfortunately we may have to charge a small fee to provide this. This fee will never exceed the cost of photocopying and postage – and we will let you know any total cost before we forward this to you.

Our charges for providing any information detailed in this guide are summarised below:

Format	Charge
Online	Free
View at our office	Free
Print in black and white	10p per A4 sheet
Print in colour	20p per A4 sheet
CD Rom	50p
Posted document/CD Rom	Cost of postage incurred

If you would like to request information that we publish in a format other than online, or arrange a visit to our office to view information, please contact:

The Corporate Services Team
Paragon Housing Association Limited
Invergrange House
Station Rd
Grangemouth
FK3 8DG
Phone: 01324 664966
E mail: enquiries@paragonha.org.uk
Web Site: www.paragonha.org.uk

Charges for Environmental Information Environmental information is provided under the EIRs rather than FOISA.

The rules for charging for environmental information are slightly different. 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 Edinburgh Leisure of providing the information:

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

The first £100 worth of information will be provided to you without charge.

Where information costs between £100 and £600 to provide, you will 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.

Where it would cost more than £600 to provide the information to you, however, we will ask you to pay the full cost of providing the information, with no waiver for any portion of the cost.

Charges for requesting for your own personal data

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

Further information on GDPR can be found on the Information Commissioner's Office website. Click [here](#) to access.

Information that 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 committee 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.

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.

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

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 our Corporate Services Team.

Charges for information which is not available under the scheme

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:

General information requests

- 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.

Complaints

If you are not happy with our decision you can ask for review of the decision. This request should be made to the Depute Director.

The review request must be

- be made within 40 working days of receipt of our decision
- contain your name and address for correspondence
- specify the request the review refers to
- tell us why you are not happy with our decision

Your case will be reviewed within 20 working days.

If you are still dissatisfied after we have reviewed our decision you can then (and only then) make an application for determination by the Scottish Information Commissioner.

The Commissioner can then investigate the decision and determine whether you should receive the information requested in full or in part, or whether the decision should be upheld.

Guide to Information Links

Guide to Information Links

At a glance – terms used in this document

Term Used	Explanation
FOISA	Freedom of Information (Scotland) Act 2002 <i>Places a duty on those organisations covered to proactively publish certain types of information; and to respond to requests for information; and to provide advice and assistance to those making requests for information.</i>
EIRs	Environmental Information Regulations (Scotland) 2004 <i>Those organisations covered by EIRs have a duty to respond to requests for environmental information.</i>
SIC	The Scottish Information Commissioner <i>Who is responsible for ensuring that those bodies covered by FOISA and EIRs comply with the terms of the legislation.</i>
MPS	Model Publication Scheme <i>Produced by the SIC – this details all of the information that those subject to FOISA should publish (if they hold it)</i>
Guide to Information	<i>A guide that all organisations subject to FOISA and adopting the MPS must produce to help people access the information it makes available</i>
Classes of Information	<i>Nine broad categories describing the types of information authorities should publish (if they hold it).</i>

The Information that we make available to you

Under the MPS, the information we provide must be listed under certain “classes” of information. These are the categories of information that are detailed below. As FOI applies to other bodies and sectors across Scotland – such as Scottish Government and Councils for example –this means that not all of the categories in the MPS apply to housing associations/co-operatives.¹

The details of all the information we hold under each of the classes that apply to our organisation, and hyperlinks to access this information when available online, are outlined below.

Information	Where to access HYPERLINKS TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE
Class 1 - About Paragon Housing Association Limited <i>Information about Paragon Housing Association Limited, who we are, where to find us, how to contact us, how we are managed and our external relations.</i>	
Descriptions of who we are	
Mission Statement	Vision Mission Values
Vision	Vision Mission Values
Values	Vision Mission Values
Corporate Objectives	Strategic Objectives
Area(s) of operation	The Association operates across the 3 local authorities in the Forth Valley area of Scotland: Falkirk/Clackmannanshire/Stirling The location of our housing stock can be found by following this link Stock List Our Estate Layout Plans can be found by following this link Estate Plans
Key activities; strategic/corporate plan(s)	About Us Annual Report & Accounts 2023-24 (paragonha.org.uk) Strategic Plan on request

¹ In the MPS Class 8: Commercial Publications and Class 9: Our Open Data do not apply to RSLs.

Information	Where to access HYPERLINKS TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE
Business Plan (or summary)	Planning & Investment & Finance Summary
Customer Code/Charter	Customer Care Policy
Location and opening arrangements	
Address	Location & Contact
Telephone number and e-mail address for general enquiries (and dedicated lines where appropriate)	Contact Details
Opening times	Opening Times & Services
General contact arrangements	Contact Details
Local/area office contact details	Contact Details All staff are located at our office in Grangemouth and can be contacted there.
Contact details for making a complaint	Complaints
Information relating to Freedom of Information	
Publication Scheme and Guide to Information	This document
Charging Schedule for Published Information	This document Page 2
Contact details and advice on making an FOI request	FOI Requests
Freedom of Information policies and procedures	This document Page 20
Charging Schedule for environmental information provided in response to requests made under EIRs	This document Page 3
About our Governing Body	
List of Governing Body Members <ul style="list-style-type: none"> Names when they became a governing body member 	Management Committee/Management Team

Information	Where to access HYPERLINKS TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE
<ul style="list-style-type: none"> Professional biographical details office-bearing responsibilities when they became an office-bearer 	
Description of the role of the Governing Body <ul style="list-style-type: none"> governance structure chart (including sub-committees and working groups); remits for governing body and any sub-committees 	Governance Structure Sub Committee Remits
How to become part of the governing body	Joining Management Committee
About our staff	
List of senior management team, including professional biography and contact details	Management Team
Organisational structure	Governance & Management Arrangements Staff Structure Governance Structure
Governance Documents and Corporate Policies	
Rules/Articles	Rules
Standing Orders	Standing Order
Membership Policy	Membership Policy
Code of Conduct for Staff	Staff Code of Conduct
Code of Conduct for Governing Body Members	Management Committee Code of Conduct
Entitlements Payments and Benefits Policy	PHA Entitlements Payments & Benefits Policy
Register of Interests	Available on request
Equalities Policy	Equalities Policy
Health and Safety Policy	H&S Policy

Information	Where to access HYPERLINKS TO DOCUMENTS/RELEVANT SECTIONS OF WEBSITE AS APPROPRIATE
Sustainability Policy	Sustainability Policy
Relationship with Regulators	
Engagement plan with Scottish Housing Regulator	SHR Engagement Letter
Assurance Statement	Assurance Statement
Annual Return on Charter Submission to SHR	PHA ARC 2023-24
Financial Returns to SHR	PHA 5 Year Financial Projections 2020 PHA Loan Portfolio Return PHA Audited Financial Statement Return
Charter report to tenants	Tenant ARC Report SHR PHA ARC Landlord Report 2023-24 ARC Report Library
Internal and External Audit arrangements	<p>Internal Audit Services are provided by Henderson Loggie Henderson Loggie</p> <p>External Audit Services are provided by RSM RSM</p>
Group Details	
Details of our subsidiaries/parent organisation	Not Applicable
Key Partnerships	
Strategic agreements with other organisations	Not Applicable

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.

How to use our services

List of services provided	Our Services
How to report a repair	Repairs & Emergencies
Right to Repair information	Right to Repair
How to apply for a house	Making a housing application
How to get information about tenancy support	Tenancy Support
How to make a complaint	Web Site Complaints Page Complaints Guide Leaflet SHR Complaints and Serious Concerns Leaflet
How to speak to a housing officer	Housing Management Teams
How we consult with tenants and other customers to inform and improve service delivery and develop new services	Tenant Participation Tenant Scrutiny Your Views Consultations

Policies and Procedures

Allocations Policy	Allocations Policy
Anti-Social Behaviour Policy	Anti Social Behaviour Policy
Asbestos Management Policy	Asbestos Policy

Arrears Management Policy	Rent Arrears Prevention and Recovery Policy
Asset Management Policy (including stock condition information)	Investment Summary In addition tenants were issued with an individual 5 year investment plan in 2019 which relates to the plans for their homes. Available on request.
Customer Care Policy	Customer Care Policy
Data Protection Policy	Data Protection Policy
Estate Management Policy	Estate Management Policy
Procurement Policy	Procurement Policy
Risk Management Policy	Risk Management Policy
Rent Setting Policy	Rent Setting
Repairs Policy	Repairs Policy
Sustainability Policy	Sustainability Policy
Tenant Participation Policy	Tenant Participation Policy
Internal procedures relating to above (where available)	Procedures
Class 3 – How we take decisions and what we have decided <i>Information about the decisions we take, how we make decisions and how we involve others.</i>	
Governing Body Meetings	
Governing body meeting minutes	Management Committee Meetings
Governing body meeting reports/papers	Available on request
Governing body agendas	Available on request

Consultation and Participation	
Tenant Participation Strategy	Tenant Participation Strategy
Consultation reports noting the outcome of any recent consultations with tenants/others	You Said We Did
Tenant Scrutiny Panel	<p>The Association has an active Tenant Scrutiny Panel, Details on how to join can be found here.</p> <p>Tenant Scrutiny</p> <p>We welcome involvement from owners where we provide factoring services</p> <p>Owners Involvement</p>
Registered Tenant Organisations	Registered Tenants Organisations
Class 4 – What we spend and how we spend it <i>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).</i>	
Information about our accounts and budgets	
Description of funding sources	The Association is funded through rental income, grant funding, factoring income and loans
Audited accounts	PHA Annual Accounts 2023-24
Budget policies and procedures	Financial Regulations
Budget allocation to key service areas	Planning & Investment
Our programme of work and projects	
Brief details of any project funding and how it's being spent	<p>We have no new build sites currently.</p> <p>We acquire properties under our “Buy Back On the Open Market Policy” – BBOOM. This is supported by grant funding from the Scottish Government.</p> <p>BBOOM Policy</p> <p>Our Housing Association Grant allocation for Stage 3 adaptations (medical) is £65,000.</p>

Capital works programme/plans information (annual programme figure)	Our Investment Special Newsletter sets out our forward stock investment plans. In addition all of our tenants were provided with an individual 5 year investment plan in 2019. These are specific to each property type we own. Investment Newsletter 2019
Spending relating to Staff and Governing Body	
Expenses policies and procedures	Expenses Policy
Senior staff/governing body member expenses at category level e.g. travel, subsistence and accommodation	Available upon request
Board member remuneration other than expenses	Our Management Committee members do not receive any remuneration
Pay and grading structure (levels of pay rather than individual salaries)	Employers in Voluntary Housing Salary Structure (EVH) followed Available upon request
General information about staff pension scheme	The Association offers pension schemes administered by TPT TPT Further information on pensions is included in our Annual Accounts Annual Accounts 2023-24
Class 5 – How we manage our resources Information about how we manage our human, physical and information resources	
Human resources	
Staffing structure	Staff Structure

<p>Human resources policies, covering:</p> <ul style="list-style-type: none"> • recruitment • performance management • salary and grading • promotion • pensions • discipline • grievance • staff development • Maintenance and retention of staff records 	<p>The Association are full members of Employers in Voluntary Housing and apply the nationally negotiated Staff Terms and Conditions and we follow good practice guidance issued by EVH in employment matters.</p> <p>Employers in Voluntary Housing</p> <p>Job Vacancies are advertised on our web site</p> <p>Vacancies</p> <p>Recruitment Policy</p> <p>Appraisal Policy</p> <p>Staff records are covered under our Data Protection Policy</p>
Trade Union information	<p>PHA is a full member of the employers representative body, Employers in Voluntary Housing (EVH).</p> <p>For collective bargaining purposes Unite is the recognised Trade Union</p>
Summary of professional organisations/trade bodies of which we are a member	<p>The Association is a member of a number of organisations. Information can be found about the organisations on the following web sites</p> <p>Employers in Voluntary Housing</p> <p>Scottish Federation of Housing Associations</p> <p>SHARE</p> <p>Energy Action Scotland</p> <p>CVS Falkirk</p>
Physical Resources	
Management of our land and property assets, including environmental/sustainability reports	About Us
General description of our land and property holdings	About Us
Estate development plans	Estate Boundary Plans

Information Resources	
Records management policy and records management plan, including records retention schedule	Data Protection Policy
Data protection or privacy policy	Data Protection Policy
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.	
Our Contractors and suppliers	
Information about our key service delivery contractors who carry out: <ul style="list-style-type: none"> • responsive repairs • landscape maintenance • planned/cyclical maintenance 	<p>Everwarm / Sureserve Energy Services - Responsive Repairs</p> <p>The Association as members of Scottish Procurement Alliance (SPA) have taken the opportunity to procure and award the JRW Contract through the SPA Refurbishment and Modernisation Framework (RM3). The contract was awarded in April 2024. They were awarded the 3 year contract for this work worth in the region of £1.3 million per annum. There is an option to further extend this contract by 2 years subject to satisfactory performance.</p> <p>City Technical Services (CTS) - Gas Servicing & Maintenance</p> <p>The Association as members of Scotland Excel used this route to procure and award the Gas Servicing and Maintenance contract through one of Scotland Excel Frameworks. The Frameworks managed by ScotExcel provides members with a route to appoint contractors that is in full compliance with the Public Contracts Scotland Regulations 2015 and as such also in compliance with the Association Procurement Policy.</p> <p>In April 2024 CTS were awarded the 3 year contract for this work worth in the region of £283,701.00 over the 3 year</p>

	<p>period. There is an option to further extend this contract by 2 years.</p> <p>Landscape Maintenance – Nurture/Tivoli</p> <p>Our landscape maintenance contractor is Nurture/Tivoli. The work was won through competitive tender in 2025.</p>
List of suppliers and contractors used by organisation (provided to staff under our Entitlements Payments and Benefits Policy)	PHA Entitlements Payments & Benefits Policy
Information about regulated procurement contracts awarded (value, scope, duration)	Public Contracts Scotland Scottish Procurement Alliance
Our Procurement	
Procurement Policy and procedures	Procurement Policy
Information on how to tender for work and invitations to tender	Procurement Link
Register of contracts awarded which have gone through formal tendering, including name of supplier, period of contract and value	Public Contracts Scotland - PHA Information <p>Further information available on request</p>
Links to procurement information we publish on Public Contracts Scotland website	Public Contracts Scotland - PHA Information
Framework Agreements	<p>SPA Scottish Procurement Alliance</p> <p>Link Group Framework – details on request</p>

Class 7 – How we are performing Information about how we perform as an organisation, and how well we deliver our functions and services	
Annual Report	Annual Report
ARC report to tenants	ARC Report Library
Performance Standards/indicators	KPI dashboard
Benchmarking information	KPI dashboard SHR RSL Data
Complaints policy, guidance and forms	Complaints Web Page
Complaints reports or equivalent to show how complaints are handled and influence service delivery (aggregate reports rather than individual outcomes).	KPI dashboard
Tenant Scrutiny reports	Tenant Scrutiny Group
Class 8 – Our commercial publications <i>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</i>	
This class does not apply to Paragon Housing Association as we do not produce any publications for sale.	Not applicable
Class 9 – Our open data Open data made available by us under the Scottish Government's Open Data Resource Pack and available under open licence.	
This class does not apply to Paragon Housing Association	Not applicable

Annex 1: Procedures

Requests

All requests will be referred to the Corporate Services Team

The request must be in recorded format e.g. email, letter, phone message etc to qualify as FOI request. The request must contain the name of the person making the request (sometimes known as the “true applicant” or “true requester”). This means that requests cannot be made anonymously and pseudonyms (fake names) cannot be used. If someone is making a request on behalf of another person, the person on whose behalf it is being made must be identified in the request.

All requests received will be logged in the Freedom of Information register and an acknowledgment issued. This register will be used to produce statistical information for reporting to the SIC and therefore requests will be designated according to the reporting categories.

Support

Staff will provide support and signposting where advice is required on making a request. The SIC web site contains useful information including a common question section which can be used as guidance.

<http://www.itspublicknowledge.info/home/ScottishInformationCommissioner.aspx>

Monitoring & Reporting

Returns are made on a quarterly basis to the SIC in line with their published schedule. A summary report will be made to Management Committee on performance and published online as part of the Association’s GTI.

Our Details

Paragon Housing Association Ltd
Invergrange House
Station Rd
Grangemouth FK3 8DG
Phone: 01324 664966
Email: enquiries@paragonha.org.uk
web site: www.paragonha.org.uk

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SHR Registration HAL 298
Property Factor PF000282

Document Versions

Version	Date Published	Updates
V1	29/10/19	
V2	20/11/19	minor amendment to document link
V3	June 2021	some document links updated to reflect migration to new web site
V4	23/01/22	updated links and change to McGill as main JRW contractor
V5	19/08/22	updated links and change Everwarm as main JRW contractor
V6	31/03/2025	Full review of document