

**Transparency Policy**

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| **Service area:** | Governance |
| **Owner:** | Head of Governance |

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| --- | --- | --- |
| **Scope** | **Entity** | **Business Stream** |
| Customers |[ ]  Progress Housing Group Limited (Parent)  |[x]  Progress Homes |[ ]
| Colleagues |[x]  Progress Housing Association Limited (PHA)  |[x]  RWP |[ ]
| Non-Executive Directors / Trustees |[x]  Reside Housing Association Limited (RHA)  |[x]  Progress Lifeline |[ ]
| Third parties\*  |[ ]  Key Unlocking Futures Limited (Key)  |[x]  Progress Living |[ ]
|  |  | Concert Living Limited |[x]   |  |
| \*Other: |  |
| Exclusions: |  |

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# Section 1: Purpose and Policy Statement

# Purpose

* 1. This policy sets out the Group’s approach to transparency of its activities. Transparency can be defined as the extent to which organisations actions are observable by third parties.

# Policy statement

* 1. The Group will:
* be open and transparent with its disclosures
* comply with regulatory, legislative and statutory requirements including:
* consider publishing additional information that would demonstrate best practice
* ensure that information published is clear, accessible, relevant, timely and appropriate to a diverse audience
* ensure that the value of the information published justifies the cost.
	1. The Group will not publish information:
* that is commercially sensitive
* would put the Group at risk of non-compliance with data protection legislation.

# Section 2: Policy Guidance

# Direction

* 1. Details of what the Group discloses and method of communication is detailed in Appendix 1.
	2. A list of policies and strategies that the Group publishes is available at Appendix 2.
	3. A list of the Group’s legal entities and trading names is available at Appendix 3.
	4. The Freedom of Information Act 2000 does not apply to housing associations, except where they are carrying out statutory duties on behalf of a local authority or public body.
	5. Where there is information that the Group must publish for legal or regulatory reasons:
* Company entity website – will publish the information
* Trading name (brand) website – will signpost back to the entity website.

# Roles and responsibilities

* 1. Lead officers, identified in Appendix 1 are responsible for ensuring the information is published.
	2. Senior leaders are responsible for informing the board of non-compliance with this policy.
	3. The Governance Team will ensure that a copy of this policy is published on the Group’s website.

# Training

* 1. The Governance Team will communicate changes to this policy to all colleagues and provide bespoke training on request.

# Section 3: Legal and regulatory

# Legislation

* Companies Act 2008
* Data Protection Act 2018
* Freedom of Information Act 2000
* Charities Act 2022
* Modern Slavery Act 2015
* Public Contracts Regulations 2015

# References

* Regulator of Social Housing Regulatory Standards
* National Housing Federation Code of Governance
* Governance Code for Larger Charities
* Corporate Governance Code

# Definitions

|  |  |
| --- | --- |
| The Group | Progress Housing Group Limited (and subsidiary companies specified within the entities section) |
| Company entity websites | Progress Housing Group Limited – (Group corporate site)Progress Housing Association Limited – (Group customer site) Key Unlocking Futures LimitedConcert Living Limited |
| Trading as (brand) websites | RWPProgress LifelineProgress LivingConcert Homes |

# Associated policies and procedures

|  |  |
| --- | --- |
| **Document reference** | **Name of document** |
| GRPOLGV03EIA | Equality Impact Assessment  |
| GRPOLGV03DPIA | Data Protection Impact Assessment |

# Equality impact assessment

* 1. An equality impact assessment (EIA) has been undertaken and the risk identified as low. There were no actions identified as a result of the EIA.

# Data protection

* 1. A Data Protection Impact Assessment (DPIA) screening questionnaire has been completed. It was determined that there was no need for a full assessment.

# Customer Voice and influence

* 1. The Group hears the customer voice in a number of different ways, including but not limited to transactional surveys, Tenant Satisfaction Measures, complaints and compliments and colleague and customer feedback sessions.
	2. Where appropriate, the documents detailed within Appendix 1 have been subject to customer influence and evidenced accordingly.

# Monitoring and review

* 1. The Group has a compliance framework in place that is reported to board on a quarterly basis. While there is a legal or regulatory requirement to publish documents, or policies require a cyclical review, any non-compliance is escalated.
	2. This policy will be reviewed every 1 year unless an earlier review is prompted by an external or internal change.

# Section 4: Appendices

# Appendix 1 – Publications table

Unless stated, all branded Progress Housing Group Limited and Progress Housing Association Limited (PHA) websites (RWP, Progress Lifeline, Progress Living) and Key Unlocking Futures Limited (Key) website signpost to the main Progress Housing Group Limited corporate website.

| **Publication** | **Where/how communicated** | **When published** | **Responsible lead** |
| --- | --- | --- | --- |
| **Financial** |
| [Financial statements](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/financial-statements/) | Progress Housing Group websiteKey Unlocking Futures Limited (Key) website | Within 6 months of financial year end | Financial Controller |
| [Directors’ remuneration and management costs](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/financial-statements-and-directors-remuneration-and-management-costs/) | Progress Housing Group website | Annually | Financial Controller |
| [Affordable homes programme expenditure](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/affordable-homes-programme-expenditure/) | Progress Housing Group website | Quarterly | Director (Financial Services) |
| [Value for Money](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/value-for-money/) | Progress Housing Group website | Annually - September  | Executive Director (Governance, People and Communications) |
| Late payments (Public Contracts Regulations 2015) | Progress Housing Group website | Annually - April | Financial Controller |
| **Performance** |
| Group [Annual Report](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/annual-report/) | Progress Housing Group website | Annually | Head of Marketing and Communications |
| [Group KPI report](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/balanced-scorecard/) | Progress Housing Group website | Quarterly | Business Systems Analysis and Improvement Manager |
| [Tenant Satisfaction Measures (Perception)](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/tenant-satisfaction-measures/) | Progress Housing Group websiteRWP website | Quarterly | Business Systems Analysis and Improvement Manager |
| [Tenant Satisfaction Measures (Management)](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/tenant-satisfaction-measures/) | Progress Housing Group websiteRWP website | Annually | Business Systems Analysis and Improvement Manager |
| Customer Promises | Progress Housing Group websiteRWP website | Quarterly | Business Systems Analysis and Improvement Manager |
| [Customer insight](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/customer-insight/) | Progress Housing Group website | When updated | Business Systems Analysis and Improvement Manager |
| [Complaints and compliments](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/complaints-and-compliments/)  | Progress Housing Group website | Quarterly | Business Systems Analysis and Improvement Manager |
| [Complaints and compliments Self-Assessment](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/complaints-and-compliments/)  | Progress Housing Group website | Annually | Business Systems Analysis and Improvement Manager |
| [Complaints and compliments - statement by the Board](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/complaints-and-compliments/)  | Progress Housing Group website | Annually | Business Systems Analysis and Improvement Manager |
| [Safeguarding performance](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/safeguarding-performance/) | Progress Housing Group website | Annually | Director (Housing Operations, RWP) |
| [Social value reporting](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/social-value-reporting/) | Progress Housing Group website | Annually - infographic 3-year position statement | Executive Director (Operations, Services & Support)  |
| [Tenants' Voice - Improving Services Annual Report](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/tenants-voice-improving-services-annual-report/) | Progress Housing Group website | Annually | Customer Voice Manager |
| [Tenant Voice - Scrutiny Reviews](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/tenant-voice-scrutiny-reviews/) | Progress Housing Group website | Quarterly | Customer Voice Manager |
| [Tenant Annual Reviews](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/tenant-annual-reviews/) | Progress Housing Group websiteRWP website  | Annually | Executive Director (Operations, Services & Support)Director (Housing Operations, RWP) |
| Raising concerns at work online form | Progress Housing Group website | Static unless form changed | Director (Business Assurance) |
| **Governance** |
| Governance structure | Progress Housing Group website | When amended | Head of Governance |
| Company registration details | Progress Housing Group websiteAll websites | Static unless change to governance structure | Head of Governance |
| Compliance with the code of governance | Progress Housing Group website (within statutory accounts) | Annually | Head of Governance |
| [Current regulatory judgement](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/current-regulatory-judgement/) | Progress Housing Group website (within statutory accounts) | As amended | Head of Governance |
| Non-executive director attendance | Progress Housing Group websiteKey website (for Trustees) | Annually | Head of Governance |
| Non-executive director remuneration | Progress Housing Group website | Annually | Head of Governance |
| Declarations of interest | Progress Housing Group website | Statement only | Head of Governance and Deputy Company Secretary |
| Gifts and hospitality | Progress Housing Group website | Statement only | Head of Governance and Deputy Company Secretary |
| **Data Protection** |
| Privacy notices | All websites and intranet | Static unless change to the notices | Data Governance Manager |
| Subject Access Request form | Progress Housing Group website | Static unless form changed | Data Governance Manager |
| Subject Access Request procedure | Intranet | Static unless procedure is updated | Data Governance Manager |
| Data Breach Incident Procedure | Intranet | Static unless procedure is updated | Data Governance Manager |
| Templates for Data Protection (Data Protection Impact Assessment, Data Processing Agreement, Data Sharing Agreement and Data Breach form) | Intranet | Static unless templates are updated | Data Governance Manager |
| GDPR compliance report summary | Intranet | Annually  | Data Governance Manager |
| **Other legal/regulatory** |
| Modern Slavery | Progress Housing Group website | Annual statement  | Head of Procurement |
| Gender Pay Gap Report | Progress Housing Group website |  Annually | Director (People & Culture) |
| [Equality, diversity and inclusion](https://corporate.progressgroup.org.uk/policies-and-reports/performance-reports/equality-diversity-and-inclusion/) | Progress Housing Group website |  Annually | Director (People & Culture) |
| Senior level employee roles and responsibilities including health and safety and complaints | Progress Housing Group website | Static unless responsible person(s) change | Executive Director (Operations, Services & Support)  |

# Appendix 2 – Policy and strategy publications

Tenant policies published externally on website:

* Aids and Adaptations Policy
* Allocations Policy
* Anti-Fraud, Anti-Money Laundering and Anti-Bribery Policy
* Antisocial Behaviour Policy
* Complaints, Feedback and Redress Policy
* Customer Volunteering Policy
* Damp and Mould Policy
* Equality, Diversity and Inclusion Policy
* Fencing Policy
* Income Collection Policy
* Overarching Property Compliance Policy Statement
* Pets Policy
* Quality Policy
* Reasonable Adjustments Policy
* Rent Policy
* Repairs and Maintenance Policy
* Shared Ownership Allocation Policy
* Social Housing Tenancy Fraud Policy
* Starter Tenancy Policy
* Succession Policy
* Tenant Match Funding Policy
* Unauthorised Occupiers Policy

Corporate policies published on website:

* Code of Conduct
* CCTV Policy
* Data Protection Policy
* Health and Safety Policy
* Raising Concerns at Work Policy
* Reserves Policy (Key)
* Safeguarding Adults Policy
* Shareholding Policy
* Transparency Policy
* Unmet Need and Child Safeguarding Policy

Strategies published on the website:

* Area Management Strategy
* Asset Management Strategy
* Customer Access Strategy
* Customer Voice Shaping Services Strategy
* Development Strategy
* Equality, Diversity and Inclusion Strategy
* Environmental Sustainability Strategy
* Health and Safety Strategy
* Income Management Strategy
* Risk Strategy
* Strategic Plan and Business Priorities
* Social Value Strategy
* Value for Money Strategy

Published internally on the intranet

All strategies and policies, including those where there is a legal or regulatory requirement to publish, including:

* Disciplinary Policy
* Early Resolution and Grievance Policy
* Data Retention Policy

# Appendix 3 – Legal entities and trading names

| **Trading or brand name** | **Company name** | **Websites** |
| --- | --- | --- |
| **Progress Housing Group** | Progress Housing Group LimitedProgress Housing Association Limited | Progress Housing Group websitewww.progressgroup.org.uk |
| **RWP****A logo with text on it  Description automatically generated** | Reside Housing Association LimitedProgress Housing Association Limited (for supported living tenants with a tenancy agreement only) | [www.residewithprogress.org.uk](https://www.residewithprogress.org.uk)Unless stated in appendix one, all regulatory and legislative information is held on Progress Housing Group website with signposting from the RWP website. |
| **Key Unlocking Futures Limited****A pink keychain with a ring  Description automatically generated** | Key Unlocking Futures Limited |  [www.keycharity.org.uk](https://www.keycharity.org.uk)Unless stated in appendix one, all regulatory and legislative information is held on Progress Housing Group website with signposting from the Key Unlocking Futures website. |
| **Progress Lifeline****A heart with colorful squares and text** | Progress Housing Association Limited (PHA)  |  [[www.progresslifeline.org.uk](https://www.progresslifeline.org.uk/)](https://www.progresslifeline.org.uk)Unless stated in appendix one, all regulatory and legislative information is held on Progress Housing Group website with signposting from the Progress Lifeline website. |
| **Progress Living****A black background with green and grey text  Description automatically generated** | Progress Housing Association Limited  |  [www.progressliving.org.uk](https://www.progressliving.org.uk)Unless stated in appendix one, all regulatory and legislative information is held on Progress Housing Group website with signposting from the Progress Living website. |
| **Concert Homes****A close up of a logo  Description automatically generated** | Concert Living Limited  | Concert Living Limited website  |