



Transparency Policy

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Service area: Governance
Owner: Head of Governance

Scope		Entity		Business Stream	
Customers	<input type="checkbox"/>	Progress Housing Group Limited (Parent)	✓	Progress Homes	<input type="checkbox"/>
Colleagues	✓	Progress Housing Association Limited (PHA)	✓	RWP	<input type="checkbox"/>
Non-Executive Directors / Trustees	✓	Reside Housing Association Limited (RHA)	✓	Progress Lifeline	<input type="checkbox"/>
Third parties*	<input type="checkbox"/>	Key Unlocking Futures Limited (Key)	✓	Progress Living	<input type="checkbox"/>
		Concert Living Limited	✓		
*Other:					
Exclusions:					

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Section 1: Purpose and Policy Statement

1. Purpose

1.1 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.

2. Policy statement

2.1 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.

2.2 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

3. Direction

- 3.1 Details of what the Group discloses and method of communication is detailed in Appendix 1.
- 3.2 A list of policies and strategies that the Group publishes is available at Appendix 2.
- 3.3 A list of the Group's legal entities and trading names is available at Appendix 3.
- 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.
- 3.5 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.

4. Roles and responsibilities

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

5. Training

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

Section 3: Legal and regulatory

6. Legislation

- Companies Act 2008
- Data Protection Act 2018
- Freedom of Information Act 2000
- Charities Act 2022
- Modern Slavery Act 2015
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7. References

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

8. 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 Limited Concert Living Limited
Trading as (brand) websites	RWP Progress Lifeline Progress Living Concert Homes

9. Associated policies and procedures

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

10. Equality impact assessment

- 10.1 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.

11. Data protection

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

12. Customer Voice and influence

- 12.1 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.
- 12.2 Where appropriate, the documents detailed within Appendix 1 have been subject to customer influence and evidenced accordingly.

13. Monitoring and review

- 13.1 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.
- 13.2 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	Progress Housing Group website Key Unlocking Futures Limited (Key) website	Within 6 months of financial year end	Financial Controller
Directors' remuneration and management costs	Progress Housing Group website	Annually	Financial Controller
Affordable homes programme expenditure	Progress Housing Group website	Quarterly	Director (Financial Services)
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	Progress Housing Group website	Annually	Head of Marketing and Communications
Group KPI report	Progress Housing Group website	Quarterly	Business Systems Analysis and Improvement Manager

Publication	Where/how communicated	When published	Responsible lead
Tenant Satisfaction Measures (Perception)	Progress Housing Group website RWP website	Quarterly	Business Systems Analysis and Improvement Manager
Tenant Satisfaction Measures (Management)	Progress Housing Group website RWP website	Annually	Business Systems Analysis and Improvement Manager
Customer insight	Progress Housing Group website	When updated	Business Systems Analysis and Improvement Manager
Complaints and compliments	Progress Housing Group website	Quarterly	Business Systems Analysis and Improvement Manager
Complaints and compliments Self-Assessment	Progress Housing Group website	Annually	Business Systems Analysis and Improvement Manager
Complaints and compliments - statement by the Board	Progress Housing Group website	Annually	Business Systems Analysis and Improvement Manager
Safeguarding performance	Progress Housing Group website	Annually	Director (Housing Operations, RWP)
Social value reporting	Progress Housing Group website	Annually - infographic 3-year position statement	Executive Director (Operations, Services & Support)
Tenants' Voice - Improving Services Annual Report	Progress Housing Group website	Annually	Customer Voice Manager
Tenant Voice - Scrutiny Reviews	Progress Housing Group website	Quarterly	Customer Voice Manager

Publication	Where/how communicated	When published	Responsible lead
Tenant Annual Reviews	Progress Housing Group website RWP 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 website All 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	Progress Housing Group website (within statutory accounts)	As amended	Head of Governance
Non-executive director attendance	Progress Housing Group website Key website (for Trustees)	Annually	Head of Governance

Publication	Where/how communicated	When published	Responsible lead
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

Publication	Where/how communicated	When published	Responsible lead
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	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
<p>Progress Housing Group</p> 	<p>Progress Housing Group Limited Progress Housing Association Limited</p>	<p>Progress Housing Group website www.progressgroup.org.uk</p>
<p>RWP</p> 	<p>Reside Housing Association Limited Progress Housing Association Limited (for supported living tenants with a tenancy agreement only)</p>	<p>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.</p>
<p>Key Unlocking Futures Limited</p> 	<p>Key Unlocking Futures Limited</p>	<p>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.</p>

Trading or brand name	Company name	Websites
<p>Progress Lifeline</p> 	<p>Progress Housing Association Limited (PHA)</p>	<p>www.progresslifeline.org.uk</p> <p>Unless stated in appendix one, all regulatory and legislative information is held on Progress Housing Group website with signposting from the Progress Lifeline website.</p>
<p>Progress Living</p> 	<p>Progress Housing Association Limited</p>	<p>www.progressliving.org.uk</p> <p>Unless stated in appendix one, all regulatory and legislative information is held on Progress Housing Group website with signposting from the Progress Living website.</p>
<p>Concert Homes</p> 	<p>Concert Living Limited</p>	<p>Concert Living Limited website</p>