

SOCIAL TENANT ACCESS TO INFORMATION REQUIREMENTS (STAIRs) POLICY

DOCUMENT CONTROL		
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Policy Aim

This policy aims to ensure that tenants and their authorised representatives can access information about the management of their social housing in a clear, consistent and timely way. It sets out how Tuntum Housing Association will meet the Social Tenant Access to Information Requirements (STAIRs), including proactive publication through a formal Publication Scheme, support for tenants who wish to make information requests, and transparent decision-making where information is withheld or redacted.

1. Purpose

This policy sets out how Tuntum Housing Association will comply with the Government's Social Tenant Access to Information Requirements, or "STAIRs", ensuring transparency, openness and tenant empowerment. It explains what information will be published routinely, how tenants may request relevant information, how requests will be assessed, the circumstances in which information may be withheld or redacted, and the route for review or complaint where a tenant is dissatisfied with the outcome.

2. Scope

This policy applies to all employees of Tuntum Housing Association, Board and committee members where relevant, and third parties contracted to provide social housing management services on behalf of Tuntum Housing Association. It applies to information held by Tuntum Housing Association, or held by another body on its behalf, that relates to the management of social housing. It covers the Publication Scheme, information requests, reviews, complaints, record keeping, monitoring and staff responsibilities.

3. Regulatory Framework

This policy is based on the Social Tenant Access to Information Requirements ("STAIRs") introduced under the amended Transparency, Influence and Accountability ("TI&A") Consumer Standard issued by the Regulator of Social Housing ("RSH"). The Ministry for Housing Communities and Local Government ("MHCLG") has issued a Direction to RSH requiring it to introduce a new Consumer Standard enabling tenants to access information held by Private Registered Providers ("PRPs"). Further to a consultation, RSH has issued an amended TI&A Standard under which PRPs are required to comply with the STAIRs Policy Statement, which sets out the requirements for PRPs to issue a Publication Scheme (Chapter 1), and secondly to respond to information requests from tenants and their representatives (Chapter 2).

STAIRs is designed to enable tenants or their designated representatives to access information which supports tenants to know more about how their services are delivered, either through information disclosed as part of a formal publication scheme or by responding to specific requests for information from tenants. For the purposes of this policy, "tenant" includes tenants of social housing and, where applicable under STAIRs, certain licensees and shared owners who own less than 100%.

Chapter 1 (requirement to introduce a Publication Scheme) takes effect from 1 October 2026. Chapter 2 (submission of Information Requests) takes effect from 1 April 2027

4. Policy Principles

STAIRs take a principles-based approach in line with the RSH Consumer Standards. Key principles include: transparency, openness, accountability and tenant involvement in how their services are delivered. Under the publication scheme within Chapter 1 of the Policy Statement providers must proactively publish information which they hold and which fall within one or more of the classes of information set out in Table 1 of the publication scheme. The Policy Statement does not provide a prescriptive list as to precisely which documents landlords are required to provide. Instead, providers retain flexibility as to what information they may provide as long as they take a proactive approach to publication. The emphasis of the Policy Statement is in favour of disclosure.

Chapter 2 of STAIRs sets out that tenants, or their designated representatives, may make a request for relevant information to their provider. Relevant information is information relating to the management of a registered provider's social housing. Tuntum Housing Association will respond promptly and no later than 30 calendar days, unless an extension is reasonable and permitted under STAIRs. Information may be withheld or redacted where the request exceeds the applicable staff-time threshold, is repeated, unclear after reasonable clarification has been sought, falls under another statutory access route, or where there is another lawful and reasonable basis for withholding information. Tuntum Housing Association will provide information irrespective of the reasons for the request or how the information may be used following disclosure and will disregard any perceived adverse impact or negative publicity which may be caused by the disclosure.

The government's intention to promote transparency and accountability under STAIRs means that PRPs should take a proactive approach to the publication of documents and consider that information ought to be published unless there is a good reason why information ought not to be published.

In applying this policy, Tuntum Housing Association will adopt a presumption in favour of disclosure unless there is a lawful, reasonable and evidenced basis for withholding or redacting information. Decisions will be made objectively and will not be influenced by the purpose of the request, the identity of the requester, potential embarrassment, criticism or reputational impact.

5. The Requirements

The STAIRs scheme has two key phases: Chapter 1 Publication Scheme; Chapter 2 Information Requests. Key requirements for each phase are set out in sections (A) and (B) below.

Information available under STAIRs is generally available free of charge. Where information is required in a non-electronic format, tenants should contact the Customer Services Team to discuss their requirements. Tuntum Housing Association is committed to ensuring that information is made as accessible as possible for all our tenants.

Where a tenant requires information in an alternative format, language, large print, audio format, paper copy or through another reasonable adjustment, Tuntum Housing Association will consider the request promptly and will provide reasonable support to ensure the information can be accessed fairly.

a. Publication Scheme (Chapter 1)

A template for a Publication Scheme detailing (i) what classes of information will be published (ii) how that information will be published is set out in Annex 1 to this policy.

a. Information Requests (Chapter 2)

Our process for handling information requests is set out at Annex 2 to this policy.

Tuntum Housing Association will maintain a log of all information requests and timelines for responding to requests for reporting and accountability purposes. The log will record the date received, requester type, information requested, service area responsible, decision made, date of response, any extension applied, whether information was disclosed, withheld or redacted, and whether a review or complaint followed.

6. Out of Scope/Withheld Information

Tuntum Housing Association is not required to create new information to comply with either the publication scheme or information requests. When considering whether the information should be published, Tuntum Housing Association will consider if the information comes within the classes of information set out in the Policy Statement. It may be necessary to redact documents prior to publication.

When considering an information request under Chapter 2, Tuntum Housing Association will consider whether any information may need to be withheld, redacted or anonymised in response to the request. Any withholding, redaction or anonymisation of information must be reasonable, proportionate and in line with the principles set out in Appendix 3.

Annex 2 to this policy sets out how we will respond to requests for information and how we will consider “reasonableness” when assessing whether information should be withheld or redacted.

Examples of information that may need to be withheld or redacted include personal data, legally privileged material, information provided in confidence, commercially sensitive information, security information, information that would prejudice regulatory or legal proceedings, and information where disclosure would otherwise conflict with statutory obligations. Any decision to withhold or redact information must be documented with reasons.

If, on receipt of any response in relation to your request, you consider that information has been redacted or withheld without a reasonable basis for doing so, you may request a review using the process set out in the Review and Complaints Process section.

Where only part of a document is exempt or unsuitable for disclosure, Tuntum Housing Association will disclose the remaining information where it is reasonable and practical to do so. Redactions will be limited to the information that must reasonably be withheld.

Where requested information involves a third party, Tuntum Housing Association will consider any relevant views of that third party where practicable, alongside whether disclosure could cause harm and whether disclosure remains reasonable and lawful.

7. Review and Complaints Process

If you consider that Tuntum Housing Association has not published information or responded to your request for information appropriately, or you are otherwise dissatisfied with the handling of your request, please contact [enter review contact details] to request a STAIRs review. A request for a review should generally be made within three months of receipt of the original decision. The review will be carried out by an appropriately senior officer who was not the original decision-maker wherever practicable. The STAIRs review process is separate from Tuntum Housing Association's ordinary complaints process, although a matter may be redirected where it falls more appropriately within another route. The purpose of any review will be to assess:

- i. how we have responded to your request for information (for example, where we may not have provided information in an accessible format);
- ii. where we have not published relevant information that we may hold and which you believe you may be entitled to;
- iii. where we have not complied with timelines for responding to your request and there is no good reason for us to have applied an extension;
- iv. where we have either withheld or redacted relevant information from disclosure and you disagree with our decision and reasons for this.

We will carry out a review of how we have handled your request and aim to respond within 30 calendar days of receipt. It may be necessary in exceptional circumstances to extend the timeline for a response. If this is necessary, we will let you know at the earliest opportunity, explain the reason for the delay and tell you when a response can be expected. Any extension issued will be reasonable and kept to a minimum.

If you are not happy with our response to your review request, you are able to escalate your complaint directly to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme. The Ombudsman's complaints scheme is available at [Contact us | Social housing | Housing Ombudsman](#). Any complaint to the Ombudsman should generally be made within 3 months of the outcome of your review.

Only matters relating to STAIRs, namely the publication of information under Chapter 1 or information requests under Chapter 2, can be addressed as part of a STAIRs review process and then by complaint to the Housing Ombudsman. Concerns relating to data protection will be handled through the usual data protection complaints process.

8. Data Protection and Security

Data protection laws are directly applicable to housing providers. Where requested information amounts to personal data or could identify an individual when combined with other information, Tuntum Housing Association will consider whether the information can be disclosed lawfully, including whether appropriate redaction or anonymisation would allow disclosure. Where the request is for the tenant's own personal information, it will usually be processed in line with our Subject Access Request process rather than STAIRs. Where another statutory right of access applies, we will direct the applicant to the appropriate route.

For further information as to how we handle your personal data, please see our privacy policy at link to [Privacy Notice and Cookies - Tuntum Housing Association](#)

9. Responsibilities

Overall accountability for this policy sits with the Executive Team through an accountable senior officer, with support from Governance, Customer Services, Communications, service leads and the Data Protection Officer. The Data Protection Officer will advise on data protection and disclosure issues. Day-to-day implementation lies with the Customer Services Team, supported by relevant service leads. All staff are required to familiarise themselves with this policy, recognise potential STAIRs requests, route requests promptly, support searches for information, preserve relevant information once a request is received, and comply with agreed timescales.

Managers are responsible for ensuring that staff in their service areas understand what information is held, where it is stored, who is responsible for it, and whether it may fall within the Publication Scheme or be relevant to an information request. The Governance Manager will coordinate periodic assurance reporting to the Executive Team and Board as appropriate.

1.1 Related Documents

- Data Protection and Subject Access Request Policy
- Complaints Policy
- Records Retention and Disposal Policy
- Information Security Policy
- Equality, Diversity and Inclusion Policy
- Reasonable Adjustments or Accessible Communications Policy
- Procurement and Contract Management arrangements

1. Training and Awareness

Tuntum Housing Association will provide appropriate training and guidance to staff involved in publishing information, responding to information requests, applying exemptions, redacting documents, managing reviews and maintaining records. Awareness will also be provided to customer-facing teams so that tenants are given clear and consistent advice about how to access information.

10. Monitoring and Review

This policy and the STAIRs scheme will be reviewed every three years, or sooner where legislation, regulatory standards, guidance, casework, audit findings or operational learning indicate that changes are required. Compliance will be monitored through periodic audits of the Publication Scheme, request handling, response times, decisions to withhold or redact information, review outcomes and tenant feedback. Assurance reporting will be provided to the Executive Team and Board as appropriate.

We will also monitor themes from requests and reviews to identify opportunities to publish more information proactively, improve records management, strengthen accountability to tenants and update supporting procedures.

Appendix 1: Publication Scheme

Tuntum Housing Association will maintain a Publication Scheme to help tenants identify and access information that is routinely available. The scheme will be reviewed and updated regularly and will be promoted through appropriate tenant communication channels.

Government class of information	Information Tuntum publishes or intends to publish	Location, format and responsible service
Governance and decision making	Board and committee structure, governance documents, senior leadership information, tenant consultation arrangements and relevant decision-making summaries.	Website or tenant communications; electronic format unless another format is requested; Governance.
Financial information	Annual reports, financial statements, value for money information, procurement information and relevant contractor spend information suitable for publication.	Website and published reports; Finance and Governance.
Housing stock and asset management	Stock profile, repairs performance, planned works, estate management information, building safety and compliance information where suitable for publication.	Website, reports, newsletters or targeted communications; Assets and Housing Services.
Performance	Tenant Satisfaction Measures, complaints performance, service standards, improvement plans and anonymised STAIRs request performance data.	Website, annual report and tenant updates; Governance, Customer Services and service leads.
Policies and procedures	Tenant-facing policies, procedures and standards relevant to housing management, including complaints, repairs, allocations, tenancy management and reasonable adjustments.	Website or available on request; responsible policy owner and Governance.
Lists and registers	Relevant public registers, declarations, service information lists and procurement or contract registers where suitable for publication.	Website or available on request; Governance, Finance and relevant service lead.
Information for tenants	Tenant handbooks, service standards, consultation information, engagement opportunities and guidance on making information requests.	Website, printed or accessible formats on request; Customer Services and Communications.

Appendix 2: Information Request Process

Who can make requests?

Requests must:

- be made by a registered tenant with us, or by their designated representative
- be made in writing; this includes requests made by letter, email, text message, website form, social media or other instant messaging application, where the requestor can be clearly identified and a valid address for correspondence is provided
- include enough information for us to identify the tenant and their representative, where appointed, and understand the request
- confirm authority to act, where a representative is making the request.

Requests do not need to mention STAIRs. Where a tenant needs support, we will make appropriate arrangements to help them make a request.

There are no restrictions on who a tenant may choose as their representative.

How long will it take us to respond?

- We will acknowledge information requests within five working days of receipt.
- We will respond to valid information requests within 30 calendar days of receipt. If we need clarification or proof of identity, the 30-day period will begin upon receipt of that information.
- Where exceptional circumstances require additional time to respond, we will notify the tenant as soon as possible, explain the reason for the extension, and ensure that any extension is kept to the minimum period reasonably necessary.

Providing, withholding or refusing information

- Where requested information is readily available, we may provide it through our normal business processes rather than the STAIRs information request process, provided this does not affect the quality or completeness of the response.
- Where a request includes the tenant's own personal data, that part of the request will be handled as a Subject Access Request in line with our data protection arrangements.
- Where requested information is held by a third party managing social housing services on our behalf, we will take reasonable steps to obtain it, taking account of our duties under STAIRs, the need for a proportionate approach and the resources required.

We may refuse to respond to an information request, withhold information or redact information where:

- it is reasonable to withhold the information from disclosure
- the identity of the applicant, or their representative, cannot be established
- the meaning of the request is not clear and you have not responded to our reasonable efforts to seek clarification
- the information requested is excluded on the basis that it is not relevant information within the scope of information requests under STAIRs
- the work involved with responding to the information request would exceed 18 hours of staff time

- the request is repeated, including where we receive repeated requests from multiple tenants acting in coordination or seeking the same information
- the request is offensive, communicated in an abusive manner or clearly intended to cause disruption to the business
- disclosure of the information may cause harm, where we have reasonably balanced the factors favouring disclosure against the likelihood of any harm arising from that disclosure.

Deciding what information, we can provide

- We will normally provide relevant information unless there is a lawful or reasonable reason not to.
- We will make decisions fairly and consistently, in line with STAIRs, data protection rules, confidentiality, legal privilege, statutory protections and any other legal or regulatory requirements.
- Before deciding whether to provide information, we will consider whether disclosure could cause harm. This may include harm to individuals, commercial interests, confidentiality, investigations, health and safety, or the effective management of services. Where information relates to, or has been provided by, another organisation or person, we may consider their views where appropriate.
- We will not refuse information because of who has asked for it, why it has been requested, how it may be used, reputational concerns or the possibility of negative publicity.
- If we withhold information, or redact parts of it, we will explain why unless doing so would reveal information that should reasonably be protected. We will provide information in an accessible format wherever possible.
- We will keep appropriate records to support transparency, consistency and accountability. This may include records of searches carried out, information considered, decisions made, reasons for disclosure, refusal, withholding or redaction, any third-party consultation, response dates, and the outcome of any review.

Reviews and escalation

- If a tenant is not satisfied with how we have handled an information request or disagrees with a decision to withhold or redact information, they can ask us to review the decision.
- Tenants should normally ask for a review within three months of our original response. We will usually complete the review within 30 calendar days. If we need longer, we will explain why and keep any extension as short as possible.
- If a tenant remains unhappy after the review, we will explain how they can escalate the matter to the Housing Ombudsman, under the STAIRs complaints route.

Appendix 3: Withholding and Redaction Decision Framework

When deciding whether information should be withheld or redacted, Tuntum Housing Association will apply the following framework:

1. Identify the information requested and confirm whether it is held.
2. Confirm whether the information relates to the management of social housing.
3. Consider whether any statutory restriction, data protection obligation, confidentiality duty, legal privilege, commercial sensitivity, security risk or other reasonable basis for withholding applies.
4. Assess whether the harm caused by disclosure would outweigh the benefit of disclosure.
5. Consider whether partial disclosure with redaction would be appropriate.
6. Record the decision, the reasons for it, who approved it, and any advice obtained.
7. Explain the decision to the requester in clear and accessible language.