



Social Tenant Access to Information Requirements (STAIRS) Policy and Procedure

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Board approval note: This policy is drafted to be adopted now as an operational transparency and information access framework. It should be reviewed when the Regulator of Social Housing publishes final amendments to the Transparency, Influence and Accountability Standard and Consumer Standards Code of Practice relating to STAIRS, and again before the statutory information-request provisions apply from 1 April 2027.

1. Introduction and Aim

The Association is committed to being open, transparent and accountable to tenants. We recognise that tenants should be able to understand how we make decisions, how we manage homes and communal areas, how we perform, and how they can hold us to account.

This policy sets out how we will meet the Social Tenant Access to Information Requirements (STAIRS), introduced under the Social Housing (Regulation) Act 2023 and the Government's STAIRS policy statement. It also supports compliance with the Regulator of Social Housing's Transparency, Influence and Accountability Standard, the Housing Ombudsman's Complaint Handling Code, UK GDPR and the Data Protection Act 2018.

The aim of this policy is to provide a clear, practical and proportionate framework for making information available to tenants of the Association, while protecting personal data, confidentiality, safeguarding, security and other legitimate interests.

2. Purpose

The purpose of this policy is to:

- explain what information we will proactively publish;
- explain what information tenants can request;
- set out when information may reasonably be withheld or redacted;
- provide a clear process for receiving, logging, assessing and responding to information requests;
- ensure information is provided in plain English and accessible formats where required;
- support tenant scrutiny, influence and engagement;
- align information request handling with complaints, data protection and record management requirements;
- provide measurable standards and assurance to the Board.

3. Scope

This policy applies to information relating to the management of the Association's social housing. This includes sheltered housing, communal areas, landlord services, housing management, repairs, maintenance, health and safety, complaints, tenant engagement, service charges, relevant policies, performance and governance arrangements.

This policy applies to:

- social housing tenants of the Association;
- designated representatives acting on behalf of a tenant, where the tenant has identified that representative to us;
- Board members, employees, contractors and service providers acting on behalf of the Association.

This policy does not replace existing statutory rights, including the right of access to personal data under UK GDPR, rights under the Data Protection Act 2018, or any other statutory route for accessing information. Where another statutory route is the correct route, we will explain this to the tenant and help signpost them appropriately.

4. Definitions

Term	Meaning
STAIRS	Social Tenant Access to Information Requirements. These requirements are designed to increase transparency for tenants of private registered providers of social housing.

Term	Meaning
Tenant	A social housing tenant, licence holder, shared owner owning less than 100% of the property equity, or any other person in a landlord-tenant relationship with the Association.
Applicant	The tenant or their designated representative making an information request.
Designated representative	A person nominated by a tenant to communicate with us on their behalf. We may ask for written confirmation of the tenant's authority.
STAIRS Co-Ordinator / request handler	The officer responsible for co-ordinating STAIRS requests and maintaining oversight of the request process. For the purposes of this policy and procedure, the STAIRS Co-Ordinator is the request handler.
Information request	A written request from a tenant or designated representative for information related to the management of the Association's social housing. The request does not need to mention "STAIRS".
Relevant information	Information held by the Association which relates to the management of our social housing.
Published information	Information we proactively make available to tenants, such as policies, performance information, service standards and reports.
Personal data	Information relating to an identified or identifiable living individual.
Special category data	More sensitive personal data, such as information about health, disability, ethnicity, religion, sexual orientation or biometric data.
Confidential information	Information provided in confidence, information subject to legal professional privilege, or information that would cause unjustified harm if disclosed.
Exempt information	Information that may reasonably be withheld or redacted, including because disclosure would conflict with legislation, data protection, safeguarding, security, legal privilege or other recognised grounds.
Reasonable adjustment	A change to how we provide information or services to remove or reduce disadvantage experienced by a disabled person.

5. Legal and Regulatory Framework

This policy has been prepared with regard to the following framework:

- Social Housing (Regulation) Act 2023;
- Government Social Tenant Access to Information Requirements policy statement and consultation response;
- Regulator of Social Housing Consumer Standards, including the Transparency, Influence and Accountability Standard;
- Regulator of Social Housing Tenant Satisfaction Measures requirements;
- Housing Ombudsman Scheme and statutory Complaint Handling Code;
- UK General Data Protection Regulation and Data Protection Act 2018;
- Freedom of Information Act 2000 principles, where relevant to interpreting openness, exemptions and transparency, while recognising that private registered providers are not generally subject to FOIA in the same way as public authorities;
- Equality Act 2010, including duties relating to reasonable adjustments and non-discrimination;
- common law duties of confidentiality;
- safeguarding duties and duties relating to health and safety.

The Association will monitor further guidance from GOV.UK, the Regulator of Social Housing, the Housing Ombudsman and the National Housing Federation and will update this policy as needed.

6. Regulatory Context and Expectations

STAIRS introduces two main requirements for private registered providers:

- from 1 October 2026, a requirement to proactively publish certain information relating to the management of social housing; and
- from 1 April 2027, a requirement to respond formally to tenant requests for relevant information.

The Regulator of Social Housing expects registered providers to communicate clearly with tenants, provide information that enables tenants to use services and hold their landlord to account, publish performance information, address complaints fairly and promptly, and ensure communication is accessible and appropriate to tenants' diverse needs.

The Housing Ombudsman expects landlords to have a positive complaint handling culture, respond fairly and promptly, learn from complaints, and publish annual complaints performance and service improvement information. Information-request complaints must be handled in a way that is consistent with these principles.

7. Guiding Principles

We will apply the following principles:

- **Transparency by default:** we will disclose information unless there is a lawful, reasonable and clearly recorded reason not to do so.
- **Plain English:** we will explain information clearly, avoiding unnecessary jargon.
- **Proportionality:** as a small provider, we will use existing records and systems wherever possible and will not create unrealistic administrative burdens.
- **Accessibility:** we will provide information in accessible formats and support tenants who need help to make a request.
- **Fairness:** we will not refuse a request because of who the tenant is, why they want the information or how they may use it after disclosure.
- **Data protection and confidentiality:** we will protect personal data, confidential information, safeguarding information and legally privileged material.
- **Accountability:** decisions to withhold or redact information must be recorded and justified.
- **Learning:** we will use requests, complaints and feedback to improve the information we publish and how we communicate with tenants.

8. Policy Statement

The Association will provide tenants with access to relevant information about the management of their homes and landlord services. We will maintain a practical publication scheme, respond to written information requests within clear timescales, and support tenants who require assistance to access information.

We will not be required to create new records solely to answer an information request or to satisfy the publication scheme. However, where information is routinely held, we will make reasonable efforts to identify it, retrieve it, review it and disclose it unless an exemption or restriction applies.

We will not destroy, manipulate or alter information with the intention of preventing disclosure.

9. Linkages to Other Policies and Procedures

This policy should be read alongside the following policies and documents:

- Complaints Policy and Procedure;
- GDPR and Data Protection Policy;
- Privacy Notice;
- Data Retention Policy;
- Tenant Engagement and Involvement Policy;

- Board Standing Orders, Scheme of Delegation and Governance Framework.

10. Roles and Responsibilities

10.1 Board

- Approves this policy and receives assurance that the Association is meeting STAIRS requirements.
- Sets the tone for openness, transparency and accountability.
- Ensures sufficient resources and oversight are in place for proportionate compliance.
- Receives quarterly STAIRS KPI reporting covering the agreed KPI measures, alongside an annual full-year report providing an overview of performance, outcomes, trends, themes, learning and improvement actions.
- Approves any material changes to the publication scheme or information governance framework.

10.2 Chief Executive / Senior Leadership Team

- Owns implementation of this policy and procedure.
- Ensures managers and staff understand their responsibilities.
- Approves complex, sensitive or high-risk disclosure decisions.
- Ensures contractors provide relevant information when reasonably required.
- Receives monthly STAIRS activity updates and reports performance, risks and learning to the Board in line with the agreed reporting framework.

10.3 Managers

- Identify information held by their service area that falls within the publication scheme.
- Ensure information provided for disclosure is accurate, current and understandable.
- Support timely responses to requests and provide information to the policy owner or STAIRS Co-Ordinator / request handler.
- Where information is held by a third party acting on the Association's behalf, ensure reasonable steps are taken to obtain that information in support of a STAIRS request.
- Identify risks, exemptions, redactions and accessibility needs.
- Ensure service improvements are made where requests reveal gaps in published information.

10.4 All Employees and Contractors

- Recognise possible information requests and pass them to the correct person promptly.
- Create and maintain accurate records of landlord services and decisions.
- Do not delete, amend or withhold records to avoid disclosure.
- Handle personal data and confidential information securely.
- Treat tenants fairly and respectfully when they ask for information.
- Co-operate with information gathering and complaint reviews.

10.5 Tenants

- May ask for information about the management of their housing.
- Should make requests in writing where possible, but we will assist tenants who need help to do this.
- Should identify any representative acting on their behalf.
- Should be treated fairly whether or not they explain why they want the information.

11. Our STAIRS Commitments

We will:

- maintain a simple publication scheme that tenants can easily access;
- publish information that helps tenants understand our services, performance and decisions;
- keep published information under review and update it at least annually, or sooner where significant change occurs;
- respond to information requests promptly and no later than the statutory backstop once applicable;
- use reasonable endeavours to obtain relevant information held by contractors, agents or service providers acting on our behalf;
- explain any refusal, redaction or delay clearly;
- make reasonable adjustments for tenants who need support;
- handle dissatisfaction through the Association's Complaints Policy where a tenant is unhappy with how a STAIRS request or publication-scheme issue has been handled;
- use learning to improve transparency and service quality.

12. Information We Will Proactively Publish

Documents and information relating to the publication scheme will be made available through our website. Some information may also be included in our annual report magazine, tenant magazine, scheme noticeboards and tenant meetings. Tenants may also request publication scheme information by contacting the STAIRS Co-Ordinator. For older tenants and those who do not use digital services, we will ensure key information is available in paper format or explained in person where appropriate.

We will not create new records solely for publication, but we will identify information we already hold and present it in a way that is meaningful, accessible and proportionate.

Information class	Examples of Information we will normally publish or make easily available	Review frequency
Governance and decision making	Board and committee structure; senior staff roles; governance arrangements; decision-making policies; tenant consultation summaries; non-confidential tenant meeting agendas and minutes; Board-approved policies.	Annual, or after material change
Spending and value for money	Annual report; audited accounts where available; summary of income and expenditure; service charge summary; explanation of how rent and service charge income is used; grants received for tenant services or property improvements.	Annual
Housing stock management	Asset management priorities; planned maintenance programme; repairs responsibilities; communal-area maintenance arrangements; energy efficiency approach; major works updates; sheltered scheme improvement plans.	Annual and project updates
Performance	Tenant Satisfaction Measures; repairs performance; complaints performance; information request data; health and safety performance; fire safety and compliance summaries; tenant engagement outcomes; action	Annual and project updates

Information class	Examples of Information we will normally publish or make easily available	Review frequency
	plans where performance needs to improve.	
Housing services	Tenant handbook; service standards; how to report repairs; emergency contact arrangements; sheltered housing support service description; aids and adaptations process; anti-social behaviour process; complaints process.	Annual
Lists and registers	Information from statutory or management registers where disclosure is lawful and proportionate, for example policy registers, compliance certificates summaries, asset registers or contracts registers without confidential details.	Annual
Social housing management policies	Key tenant-facing policies, including repairs, complaints, allocations/lettings where applicable, tenancy management, rent and service charges, EDI, safeguarding, reasonable adjustments and tenant engagement.	As approved or reviewed

13. Information Tenants Can Request

Tenants can request relevant information relating to the management of their housing. Examples include:

- repairs and maintenance policies, procedures and performance;
- planned maintenance affecting their scheme or communal areas;
- health and safety information relating to their home, block, scheme or communal areas;
- service charge information and explanations of communal costs;
- policies and procedures used to make housing management decisions;
- complaints handling procedures and performance;
- tenant engagement activities and how tenant views have influenced decisions;
- staffing roles and responsibilities relating to sheltered housing services;
- contractor performance information where it relates to landlord services;
- environmental, energy efficiency or net zero plans relevant to their home or scheme;
- information about communal cleaning, grounds maintenance, lift servicing, fire safety checks or repairs to shared facilities;
- information about how the Association manages anti-social behaviour, neighbour disputes or communal-area concerns.

Requests for a tenant's own personal data will normally be handled as a subject access request under UK GDPR. Requests for information that can be accessed through another statutory route will be signposted to that route.

14. Information Exemptions and Restrictions

The Association will disclose information wherever it is reasonable and lawful to do so. We may refuse or redact information where disclosure would be unlawful, unsafe, unfair, disproportionate or otherwise unreasonable.

We may withhold or redact information where it involves:

- personal data about another person where disclosure would breach data protection law;
- special category data, including health or care information, unless disclosure is lawful and appropriate;
- confidential information provided by a third party;
- legal professional privilege or live legal proceedings;
- safeguarding concerns, including information that could place an older or vulnerable person at risk;
- security-sensitive information, for example detailed fire alarm, CCTV, access control or emergency system vulnerabilities;
- commercially sensitive information where disclosure would cause unjustified prejudice to the Association or a contractor;
- ongoing investigations, including complaints, disciplinary matters, fraud, anti-social behaviour or safeguarding enquiries;
- information not related to the management of social housing;
- information already available through another statutory access route;
- requests where the applicant's identity or authority cannot be established;
- unclear requests where clarification has not been provided after reasonable assistance;
- requests that would exceed 18 hours of staff time to respond;
- repeated, coordinated, offensive or abusive requests.

Where only part of a document is exempt, we will disclose the remaining information where practical.

15. How Tenants Can Request Information

Tenants or their designated representatives can make an information request by email, letter, telephone, in person, at a scheme meeting, or by asking a member of staff to help record the request in writing.

- emailing STAIRS@eldonhousing.co.uk;
- writing to The Office, 21 Bardsley Court, 174-176 Selhurst Road, South Norwood, London SE25 6LX;
- phoning 07842 411 743;
- asking a member of staff to help them put the request in writing;
- asking at a scheme meeting, where staff will help record the request.

A request does not need to mention "STAIRS". If it is clear that a tenant is asking for information about the management of their housing, staff must treat it as a potential information request and pass it to the STAIRS Co-ordinator / request handler.

Where a tenant has difficulty reading, writing, using digital services or communicating by email, we will offer reasonable assistance. This may include taking the request verbally and confirming it in writing, providing large print, arranging a phone call, meeting in person, involving an advocate, or using translation or interpretation where reasonably required.

16. Request Assessment and Decision-Making

Each request will be assessed using the following questions:

1. Is the applicant a tenant or a designated representative of a tenant?
2. Is the request in writing, or have we assisted the tenant to record it in writing?
3. Is the request clear enough to understand? If not, what clarification is needed?

4. Does the request relate to the management of our social housing?
5. Do we hold the information, or is it held by a contractor or service provider acting on our behalf?
6. Is the information already published or available through another statutory route?
7. Would responding exceed 18 hours of staff time?
8. Does an exemption or restriction apply?
9. Can information be disclosed with redactions rather than refused?
10. What format does the tenant need the response in?

The default position is disclosure unless there is a clear reason not to disclose. Complex or sensitive decisions must be escalated to the Chief Executive / Senior Leadership Team and, where appropriate, the Data Protection Lead or external legal adviser.

17. Timescales and Service Standards

Stage	Standard
Acknowledgement	Within 5 working days of receipt. Earlier where possible.
Clarification request	Within 5 working days where the request is unclear. The response clock will be paused while awaiting clarification where necessary.
Target response	No later than 30 calendar days from receipt, unless exceptional circumstances justify further time.
Extension notice	Before the original response deadline, explaining why more time is needed and when a response is expected.
Publication scheme review complaint	Complaints will be handled in line with the Association's Complaints Policy. Stage 1 complaints will be investigated and responded to within 10 working days. If the complaint is escalated to Stage 2, it will be investigated and responded to within 20 working days.
Information request review complaint	Complaints will be handled in line with the Association's Complaints Policy. Stage 1 complaints will be investigated and responded to within 10 working days. If the complaint is escalated to Stage 2, it will be investigated and responded to within 20 working days.

18. Accessible Information and Reasonable Adjustments

We recognise that some tenants may experience barriers due to age, disability, health conditions, sensory impairment, language, digital exclusion, literacy or confidence. We will actively support tenants to access information.

Reasonable adjustments may include:

- large print documents;
- plain English summaries;
- telephone explanations;
- face-to-face meetings at a scheme;
- allowing a family member, advocate or representative to assist where authorised;
- providing documents by post rather than email;

- translation or interpretation where reasonably required.

We will ask tenants about their communication preferences and record agreed adjustments where appropriate.

19. Equality, Diversity and Inclusion

We will ensure this policy is applied fairly and does not disadvantage tenants because of age, disability, sex, race, religion or belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy or maternity, or any other protected characteristic.

We will monitor whether tenants are able to access information fairly, and we will consider whether communication methods meet the needs of older tenants, disabled tenants, tenants with language barriers and tenants who are digitally excluded.

20. Complaints, Reviews and Appeals

If a tenant is dissatisfied because they believe information should have been published, or they are unhappy with how an information request has been handled, this will be dealt with in line with the Association's Complaints Policy.

This includes concerns about:

- delays in responding to a STAIRS request;
- a refusal to provide information;
- redactions applied to information;
- the clarity or completeness of the response;
- how the request was managed or communicated;
- a decision about what should be included in the publication scheme.

Complaints will be handled in line with the Association's Complaints Policy and the Housing Ombudsman's Complaint Handling Code. Tenants will be informed of their right to approach the Housing Ombudsman if they remain dissatisfied after the Association's final response or where the Housing Ombudsman Scheme allows escalation.

21. Record Keeping and Data Protection

We will keep accurate records of information requests, decisions, disclosures, refusals, redactions, complaints and learning. Records will be retained in line with the Association's Archiving and Document Retention Procedure.

Information request records should include:

- date received and acknowledgement date;
- tenant name and contact details;
- representative details and authority, where applicable;
- request wording and any clarification;
- information searched for and located;
- departments, staff or contractors contacted;
- decision made and reasons;
- exemptions or redactions applied;
- approval and sign-off;
- date response issued;
- complaint outcome, where applicable;
- learning or publication-scheme improvements identified.

Personal data must be handled securely and in accordance with UK GDPR, the Data Protection Act 2018 and the Association's GDPR and Data Protection Policy. Staff must take care not to disclose personal data about other tenants, staff, visitors, carers, family members, complainants or contractors unless disclosure is lawful and appropriate.

22. Performance Monitoring and Continuous Improvement

The Association will maintain a proportionate performance framework. The Senior Leadership Team will receive a monthly overview of STAIRS activity, including the number of requests received, progress against open requests, outcomes, risks, complaints, learning and implementation progress. The Board will receive quarterly KPI reporting for the measures listed below. The Board will also receive a full annual report providing an overview of STAIRS KPI performance across the year, including outcomes, trends, themes, learning and any improvement actions.

KPI	Target / standard	Reporting frequency
Number of information requests received	Reported as volume and trend. No numerical target.	Quarterly
Requests acknowledged within 5 working days	95% or above	Quarterly
Requests responded to within statutory timeframe	100% within 30 calendar days unless formally extended	Quarterly
Number of requests fully disclosed, partially disclosed or refused	Reported as volume and trend. No numerical target.	Quarterly
Number of complaints relating to information requests or publication-scheme issues	Reported as volume and trend. No numerical target.	Quarterly
Publication scheme annual review completed	100% by agreed annual review date	Annual
Staff training completed	100% of relevant staff briefed annually	Annual
Reasonable adjustments provided	Reported qualitatively to identify accessibility improvements	Annual

Learning from requests and complaints will be used to identify information that should be published more clearly or more routinely. Where tenants repeatedly request the same type of information, we will consider adding it to the publication scheme.

23. Policy Review Arrangements

This policy will be reviewed annually, or sooner if there are changes to STAIRS, the Regulator of Social Housing's standards, Housing Ombudsman requirements, data protection law, or significant changes to the Association's services or structure.

The policy owner is responsible for ensuring that the review includes tenant feedback, request data, complaints learning, legal and regulatory updates, and Board assurance requirements.

VERSION CONTROL - To be completed following any updates and amendments.

Version	Author	Date	Amendment Summary

STAIRS Procedure

24. Purpose of the Procedure

This procedure gives staff a practical step-by-step process for handling information requests and publication scheme issues. It should be followed by all employees, contractors and agents who receive, handle or approve information for disclosure.

25. Roles in the Procedure

Role	Responsibility
STAIRS Co-Ordinator / request handler	Acts as the request handler for STAIRS requests, maintains the request log, acknowledges requests, coordinates information gathering, drafts responses and tracks deadlines.
Service manager	Provides accurate service information, identifies risks, reviews content for accuracy and proposes redactions.
Data Protection Lead	Advises on personal data, third-party data, special category data, privacy, redaction and subject access requests.
Chief Executive / Senior Leadership Team	Approves complex, sensitive, high-risk, refused or partially refused responses.
Board / Committee	Receives assurance reports and approves policy changes.
All staff and contractors	Recognise requests, preserve records, provide information promptly and protect confidentiality.

26. End-to-End Process

26.1 Receipt of requests

Requests may arrive by email, letter, form, tenant meeting, telephone conversation or in-person conversation. If a request is made verbally, staff should help the tenant put it into writing by recording the request and confirming the wording with the tenant.

Staff must forward any potential information request to the STAIRS Co-Ordinator / request handler within 1 working day.

26.2 Logging and tracking requests

The STAIRS Co-Ordinator / request handler must record each request on the STAIRS Request Log. The log may be a spreadsheet or existing case management system. It must include the fields listed in section 21 and must show the response deadline.

26.3 Acknowledgement process

The STAIRS Co-Ordinator / request handler must acknowledge the request within 5 working days. The acknowledgement should:

- thank the tenant for the request;
- confirm what information has been requested;
- confirm the date received and expected response date;
- ask for clarification if needed;
- explain if the request appears to be a subject access request or another statutory request;
- ask about accessibility needs if not already known.

26.4 Assessment of requests

The STAIRS Co-Ordinator / request handler must assess whether the request is valid and in scope. If the tenant is not identifiable, the representative is not authorised, or the request is unclear, reasonable assistance must be provided before any refusal is considered.

Where the request is clearly outside STAIRS, the tenant should be told why and signposted to the correct route where possible.

26.5 Information gathering

The STAIRS Co-Ordinator / request handler will ask relevant managers and contractors to search for information. Searches should be reasonable, focused and proportionate. Staff should search obvious locations first, including tenancy records, repairs systems, compliance folders, policy files, contract management records, meeting minutes and published reports.

Where relevant information is held by a contractor, consultant or other organisation acting on the Association's behalf, the Association will take reasonable steps to obtain that information to respond to a STAIRS request. Relevant managers responsible for those arrangements will support the retrieval of information and, where appropriate, ensure contracts include suitable information-sharing, records management and co-operation provisions.

26.6 Review, approval and sign-off

Before disclosure, the response must be reviewed for accuracy, completeness, accessibility, data protection and confidentiality. The level of sign-off depends on risk:

- routine disclosure: request handler and relevant service manager;
- personal data, safeguarding, security or confidentiality: Data Protection Lead and senior manager;
- refusal, partial refusal, complex redaction, legal risk or potential reputational sensitivity: Chief Executive / Senior Leadership Team;
- high-risk governance or Board-level information: Chief Executive and Chair, where appropriate.

26.7 Disclosure process

Information should be provided in the format requested where reasonable. Where this is not possible, we will explain why and provide an accessible alternative. Responses should be clear, polite and practical. Where information is already published, the response should provide the link, a copy, or details of where the tenant can access it. For tenants who are digitally excluded, paper copies or in-person explanation should be offered where reasonable.

26.8 Redaction requirements

Redaction means removing or obscuring information that should not be disclosed. Redaction must be permanent and checked before release. Staff must not use highlighting or text colour changes that can be reversed. Where possible, disclose the rest of the document rather than refusing the whole request.

The response should explain the broad reason for any redaction, unless doing so would itself disclose protected information.

26.9 Escalation routes

Escalate immediately where a request involves safeguarding, alleged serious service failure, legal proceedings, media interest, significant health and safety risk, a data breach, possible whistleblowing, or a tenant who may be vulnerable or at risk.

26.10 Complaint handling

If a tenant is dissatisfied with a STAIRS response, refusal, delay, redaction or publication-scheme decision, staff must explain how the tenant can make a complaint under the Association's Complaints Policy. Complaints will be handled within the timescales set out in that policy.

27. Simple Workflow Table

Step	Action	Owner	Timescale	Record required
1	Receive information request and forward to STAIRS Co-Ordinator / request handler	All staff	Within 1 working day	Copy of request
2	Log request and calculate deadline	STAIRS Co-Ordinator / request handler	Within 3 working days	STAIRS Request Log
3	Acknowledge request / seek clarification	STAIRS Co-Ordinator / request handler	Within 5 working days	Acknowledgement letter/email
4	Confirm tenant identity and representative authority where needed	STAIRS Co-Ordinator / request handler	As soon as practicable	Confirmation added to STAIRS Request Log
5	Assess scope, route and potential exemptions	STAIRS Co-Ordinator / request handler with manager	Within 5-10 working days	N/A
6	Gather information from services, contractors or agents	Service manager	Normally within 10 working days	Search record
7	Review for accuracy, data protection, confidentiality and exemptions	Manager / STAIRS Co-Ordinator / request handler	Before disclosure	Confirmation added to STAIRS Request Log

Step	Action	Owner	Timescale	Record required
8	Approve disclosure, redaction, refusal or extension	Relevant signatory	Before deadline	Approval record (STAIRS Request Log)
9	Issue response in accessible format	STAIRS Co-Ordinator / request handler	No later than 30 calendar days from receipt once the statutory requirement applies, unless exceptional circumstances justify further time.	Final response and disclosed documents
10	Update log and capture learning	STAIRS Co-Ordinator / request handler	Within 5 working days of response	Closed case record (STAIRS Request Log)
11	Handle complaint if raised	Complaints Co-Ordinator / Named Person	In line with the Association's Complaints Policy	Complaint outcome

28. Redaction Guidance

Staff must consider whether information can be disclosed with limited redaction rather than refused. Redactions should be proportionate and justifiable.

Scenario	Approach
Repairs log includes another tenant's name and phone number	Redact the other tenant's personal details and disclose relevant repair information if otherwise in scope.
Communal fire risk assessment identifies security vulnerabilities	Disclose general findings and action plan where safe, but redact details that could compromise security.
Board paper includes legally privileged advice	Withhold or redact privileged legal advice and disclose non-privileged factual information where possible.
Service charge breakdown includes contractor rates	Disclose tenant-relevant cost categories and totals; consider redacting detailed commercially sensitive rates if justified.
Safeguarding note about an older tenant	Withhold or heavily redact information where disclosure could place any person at risk or breach confidentiality.

29. Examples of Information Normally Disclosed

- Current Repairs and Maintenance Policy.
- How to report emergency repairs and expected response standards.
- Planned maintenance programme for a sheltered scheme.
- Summary of communal cleaning specification and frequency.
- Service charge estimate and year-end statement.
- Explanation of how communal heating, lift maintenance or grounds maintenance charges are calculated.
- Fire safety policy and general fire risk assessment findings for communal areas, with sensitive details removed if needed.
- Health and safety compliance summary, such as gas, electrical, lift, asbestos or legionella compliance rates.

- Tenant Satisfaction Measures results and survey approach.
- Complaints policy, complaint performance and learning from complaints.
- Tenant engagement calendar and minutes of tenant meetings, with personal data removed.
- Organisational structure and senior staff roles.
- Board-approved policies relating to tenancy management, ASB, safeguarding, EDI and reasonable adjustments.
- How tenant views influenced a change to repairs reporting or communal lounge use.
- Scheme improvement action plan, where disclosure does not compromise procurement, legal or safety issues.
- Contractor performance summaries for repairs, cleaning or grounds maintenance.
- Summary of how rent and service charge income is spent.
- Aids and adaptations procedure and decision criteria.

30. Examples of Information That May Be Withheld

- Names, addresses, phone numbers or health information about other tenants.
- Safeguarding records about an older or vulnerable person.
- Detailed CCTV, access control, alarm or security system layouts.
- Information that could prejudice an ongoing ASB investigation.
- Information that could prejudice an ongoing complaint investigation before findings are reached.
- Legally privileged advice from solicitors or counsel.
- Confidential settlement discussions or mediation records.
- Detailed tender pricing during a live procurement exercise.
- Information supplied by a contractor in confidence where disclosure would cause unjustified commercial harm.
- Staff disciplinary or grievance records.
- Whistleblowing reports and identities of whistleblowers.
- Information not related to social housing management, such as non-housing commercial activities.
- Information that can only properly be accessed through a subject access request or another statutory route.
- Requests requiring more than 18 hours of staff time to locate, retrieve, review and prepare information.
- Repeated requests that substantially duplicate a previous request without a reasonable interval or new issue.
- Offensive or abusive requests, subject to proportionality and Equality Act considerations.

31. Escalation Matrix

Issue	Escalate to	Reason
Personal data about another person	Data Protection Lead	Assess lawful disclosure and redaction.
Special category data / health information	Data Protection Lead	High privacy and harm risk.
Safeguarding concern	Head of Housing, Care & Support and senior manager	Protect older or vulnerable tenants.
Security-sensitive information	Senior Leadership Team / Chief Executive	Prevent risk to tenants, staff or buildings.
Legal advice or legal proceedings	Chief Executive and legal adviser	Protect privilege and litigation position.
Contractor-held information	Head of Service	Ensure reasonable endeavours and contract compliance.
Request likely to exceed 18 hours	Chief Executive	Assess proportionality and possible refinement.
Refusal or partial refusal	Chief Executive / Senior Leadership Team	Ensure decision is reasonable and documented.

Issue	Escalate to	Reason
Tenant vulnerable or at risk	Head of Housing, Care & Support	Consider support and reasonable adjustments.

32. Complaint Handling Process

The following process applies where a tenant is unhappy with a STAIRS response or publication-scheme issue. The matter will be handled through the Association's Complaints Policy and in line with the Housing Ombudsman's Complaint Handling Code. Staff must not create a separate STAIRS review stage.

11. Treat the matter as a complaint where the tenant expresses dissatisfaction with the handling of a STAIRS request, refusal, redaction, delay, communication or publication-scheme decision. The tenant does not need to use the word "complaint".
12. Acknowledge and log the complaint in line with the Complaints Policy and the Complaint Handling Code, normally within 5 working days of receipt.
13. Confirm the complaint stage, the issues to be investigated, the expected response date and any reasonable adjustments or communication preferences.
14. Investigate fairly and proportionately, considering the original request, searches completed, exemptions or redactions applied, communication, accessibility, timescales and any impact on the tenant.
15. Respond to Stage 1 within 10 working days of the complaint being acknowledged. If the complaint is escalated to Stage 2, acknowledge the escalation and respond within 20 working days, unless an extension is agreed and explained in line with the Complaints Policy and the Complaint Handling Code.
16. Provide a clear written response setting out the complaint definition, decision, reasons, evidence considered, any remedy or apology, any decision to disclose further information, and any service improvement action.
17. At Stage 1, explain how the tenant can escalate the complaint if they remain dissatisfied. At the final stage, explain the tenant's right to approach the Housing Ombudsman.
18. Record the outcome, learning, remedies and any changes needed to the publication scheme, STAIRS procedure, staff guidance or service delivery.

33. Monitoring and Reporting

The STAIRS Co-Ordinator / request handler will prepare a monthly overview of STAIRS activity for the Senior Leadership Team, covering the number of requests received, progress against open requests, outcomes, risks, complaints, learning and implementation progress. The STAIRS Co-Ordinator / request handler will also prepare quarterly KPI information for the Board. Quarterly Board reporting will cover the agreed KPI measures, including request volumes and trends, acknowledgement performance, response performance, disclosure outcomes and complaints relating to information requests or publication-scheme issues. The Board will also receive an annual report giving a full overview of KPI performance across the year, including outcomes, trends, themes, learning and improvement actions.

Reports should cover:

- number and type of requests received;
- timeliness of acknowledgements and responses;
- outcomes: disclosed, partially disclosed, refused, signposted or withdrawn;
- main reasons for refusal or redaction;
- complaint outcomes;
- accessibility issues and reasonable adjustments provided;
- recommended publication-scheme updates;
- training needs and system improvements.

34. Staff Compliance Checklist

Before issuing a response, staff must check:

- Has the request been logged?
- Has the tenant or representative been identified?
- Has the request been acknowledged within 5 working days?
- Is the request clear? If not, has reasonable help been offered?
- Does the request relate to social housing management?
- Have all reasonable searches been completed and recorded?
- Have contractors been asked for information if they hold it on our behalf?
- Is the information already published or available through another route?
- Has personal data about other people been removed or lawfully assessed?
- Have safeguarding, security, legal privilege and confidentiality risks been checked?
- Can the information be partially disclosed rather than refused?
- Has any redaction been applied securely and permanently?
- Has the correct manager approved the response?
- Is the response written in plain English?
- Have accessibility needs and reasonable adjustments been considered?
- Does the response explain any refusal, redaction or delay?
- Does the response explain complaint rights?
- Has the request log been updated and any learning recorded?

35. Practical Examples

Request example	Likely handling approach
"Can I see the fire safety information for our scheme?"	Provide the fire safety policy, tenant fire safety guidance and non-sensitive summary of fire risk assessment findings and actions. Redact security-sensitive details if needed.
"Why has the communal lounge carpet not been replaced?"	Provide planned maintenance criteria, scheme inspection record summary and any relevant decision note, removing personal data and confidential contractor information.
"Can I see all complaints made by other tenants about the scheme manager?"	Do not disclose personal complaint records. Consider providing anonymised complaint themes or performance data where held and appropriate.
"How much are we paying for communal cleaning?"	Provide service charge breakdown or cleaning contract cost summary where held. Consider commercial sensitivity only for detailed tender rates or live procurement.
"I want the repairs history for my flat."	If it relates to the tenant's own property and personal data, consider whether to handle as STAIRS, subject access request, or both. Disclose repairs history where appropriate, redacting third-party details.
"Can my daughter ask for information for me?"	Ask the tenant to confirm in writing or by recorded consent that the daughter is their representative, then correspond with the daughter as appropriate.

36. Appendix A: Request Log Fields

Field	Purpose
Reference number	Unique tracking number.
Date received	Calculate acknowledgement and response timescales.

Field	Purpose
Applicant name	Identify tenant or representative.
Address / scheme	Link to relevant property or sheltered scheme.
Representative authority	Record consent or authority if applicable.
Request wording	Preserve original request.
Clarification requested / received	Track whether request was clear.
Information owner	Service area responsible for information.
Searches completed	Evidence reasonable search.
Contractor information requested	Track third-party information gathering.
Decision	Disclose, partial disclose, refuse, signpost, withdrawn.
Exemption / restriction	Record reason for withholding or redaction.
Approval	Named approver and date.
Response date	Monitor timescales.
Complaint	Track dissatisfaction and outcome.
Learning	Record publication or service improvements.

37. Appendix B: Model Acknowledgement Wording

Dear [Tenant Name],

Thank you for your request for information received on [date]. We understand your request to be: [insert request summary].

We will consider your request under our Social Tenant Access to Information Requirements Policy. We will respond no later than 30 calendar days from receipt once the statutory requirement applies, unless exceptional circumstances justify further time. If we need to clarify your request, obtain information from a contractor, consider exemptions, or take more time, we will let you know.

Please tell us if you need the response in a particular format, such as large print, paper copy, telephone explanation, email or another reasonable format.

Yours sincerely,
[Name]

38. Appendix C: Model Response Wording

Dear [Tenant Name],

Thank you for your request for information. You asked for: [insert request summary].

Our response is below / attached. [Provide information or explain where it can be accessed.]

We have removed some information because [brief reason, for example: it contains personal data about another person / it is security-sensitive / it is legally privileged / it is commercially confidential]. We have disclosed the remaining information where we reasonably can.

If you are unhappy with how your request was handled, including any delay, refusal, redaction or the way we communicated with you, you can make a complaint under the Association's Complaints Policy. Details of how to complain are available at [Eldon Housing Association Ltd Complaint Policy & Procedures Summary - Eldon Housing Association Ltd](#)

Yours sincerely,
[Name]

39. Appendix D: Source and Best Practice Basis

This policy has been drafted with regard to the following primary and sector sources. The Association should check these sources as part of each annual review:

- GOV.UK: Social Tenant Access to Information Requirements policy statement, published 30 September 2025.
- GOV.UK: Social Tenant Access to Information Requirements consultation response, published 30 September 2025.
- Regulator of Social Housing: Transparency, Influence and Accountability Standard.
- Regulator of Social Housing: Consultation on changes to the Transparency, Influence and Accountability Standard and Consumer Standards Code of Practice.
- Regulator of Social Housing: Tenant Satisfaction Measures Technical Requirements.
- Housing Ombudsman: Complaint Handling Code and associated guidance.
- National Housing Federation: Social Tenant Access to Information Requirements operational guidance for housing associations.
- ICO and GOV.UK guidance on UK GDPR, Data Protection Act 2018, exemptions, personal data and safe disclosure.

VERSION CONTROL - To be completed following any updates and amendments.

Version	Author	Date	Amendment Summary