

Social Tenant Access to Information Requirements (STAIRs) Policy

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1. Policy information

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2. Background

The Social Tenants Access to Information Requirements (STAIRS) is a new standard introduced by the UK Government to enhance transparency for tenants. STAIRS creates a legal framework that:

- Supports openness and accountability.
- Strengthens trust between tenants and landlords.
- Enables tenants to understand decisions, performance and service delivery.

STAIRS is not intended to replace existing laws or to require unrestricted disclosure. It focuses on providing tenants with meaningful visibility of how their homes and services are managed, while ensuring information is handled lawfully, consistently and with appropriate safeguards in place.

3. Policy aims

The purpose of this policy is to support openness, transparency and accountability by enabling tenants to access information about how we manage homes and deliver services.

The STAIRS are intended to support tenants to understand and scrutinise decisions, performance and service delivery, and to hold their landlord to account where appropriate.

This policy sets out how we will meet these requirements in a fair, proportionate and consistent way.

4. What is STAIRS

STAIRS applies to private registered providers of social housing. It is being introduced in two phases:

- From 1 October 2026: a publication scheme.
- From 1 April 2027: a right for tenants to request information.

STAIRS rights apply to current tenants, or people acting on their behalf. They do not apply to the general public or media.

5. Scope

This policy applies to SLH and covers all social housing services we manage. It applies to:

- All current tenants.
- People acting on behalf of a tenant, such as an advocate or solicitor.
- All colleagues, managers and directors involved in producing, managing or sharing information.

This policy covers:

- Information published as part of our STAIRS publication scheme.
- Requests for information made under STAIRS.
- How requests are handled, reviewed and recorded.

This policy does not apply to:

- Requests from the general public or the media.
- Requests made by former tenants.
- Requests for personal data, which are handled under data protection law.

Where a request includes both personal data and non-personal information, we will explain clearly which parts are covered by STAIRS and which are handled as a Data Subject Access Request (DSAR).

6. Policy statement

We will apply the STAIRS requirements in line with the following principles:

- Openness and transparency: We will take a proactive approach to publishing information and providing access wherever possible.
- Presumption in favour of disclosure: Information will normally be disclosed unless there is a clear and reasonable basis for withholding or redacting it.
- Lawfulness and proportionality: All decisions will have due regard to data protection, confidentiality and other legal duties.
- Consistency and fairness: Requests will be handled consistently across the organisation, regardless of the individual tenant or service area involved.
- Purpose-blind handling: We will not take account of a tenant's reasons for making a request, how the information may be used, or any perceived reputational impact when deciding whether information should be disclosed.

7. Responsibilities

7.1 STAIRS lead

The STAIRS lead is the innovation manager. Their role is to:

- Oversees implementation of the STAIRS policy and publication scheme.
- Ensures requests are handled lawfully, consistently and within timescales.
- Maintains records of requests, reviews and outcomes.
- Provides advice and support to colleagues on STAIRS matters.
- Maintains the STAIRS register.
- Monitors compliance and performance.

7.2 Managers and heads of service

- Ensure information in their area is accurate, up to date and published as required.

- Support colleagues in responding to requests and reviews.
- Identify and escalate any risks or issues relating to STAIRs.

7.3 All colleagues

- Understand the basics of STAIRs and know where to find guidance.
- Support tenants in accessing information and making requests.
- Refer all requests to the STAIRs lead via dataprotection@southliverpoolhomes.co.uk.

7.4 Governance team

- Monitors compliance and supports audit activity.

7.5 Quality and performance team

- Logging complaints and feedback.
- Coordinates responses to the Housing Ombudsman requests and investigations.

7.6 Communications team

- Maintains the STAIRs section of the website.
- Ensures information is accessible, clear and up to date.

8. Policy Detail

The STAIRs scheme has two key phases:

- Phase 1: publication scheme – 1st October 2026
- Phase 2: access to information – 1st April 2027

8.1 Phase 1: Publication Scheme

From 1st October 2026 we will operate a STAIRs publication scheme that sets out the information we make available as standard. This information will be published on our website in a dedicated and clearly signposted STAIRs section to ensure it is easy for tenants to find and understand.

The publication scheme will include information we already hold about how our homes and services are managed and will be structured using the categories set out in the STAIRs requirements.

- Governance and decision-making
- Financial and spending information
- Housing stock and asset management
- Performance information
- Policies relating to housing management
- Service standards and delivery information
- Registers and statutory disclosures

Information will be reviewed regularly to ensure it remains accurate, relevant and up to date. Where information does not exist or cannot be published, we will explain this clearly.

8.2 Phase 2: Access to information

As of 1 April 2027, our tenants have the right to request information about the management of their homes and services where that information is not already published. We will explain clearly how requests can be made and what tenants can expect from the process.

We will provide support to tenants who need help to access information and will make reasonable adjustments to ensure our approach is inclusive and accessible. Requests will be handled consistently across the organisation, regardless of which service area the information relates to.

8.2.1 Who can make a request

A STAIRS request can be made by any of our current tenants. Requests can also be made by someone acting on behalf of a tenant, such as an advocate, family member or solicitor, provided they have the tenant's permission. Requests from the general public, the media, former tenants or organisations not acting for a tenant will not be accepted.

For the purposes of STAIRS, a tenant includes individuals who have a current landlord-tenant relationship with us in connection with social housing, including licensees and shared owners who do not own 100% of the equity in their home.

Requests may be made by a representative acting on a tenant's behalf. Where a representative is not already known to us, we may ask for confirmation that they are authorised by the tenant to act for them.

8.2.2 How to make a request

A request should be made in writing. Tenants can send their request by email, online form, webchat or letter to us. If a tenant needs help to make a request, we will provide support and make reasonable adjustments, such as accepting requests in other accessible formats.

A request does not need to refer to "STAIRS" or any specific legislation to be treated as a STAIRS request. Any written request from a tenant or their authorised representative for information relating to the management of social housing will be considered under this policy where appropriate.

We will explain clearly on our website and in tenant communications how to make a STAIRS request, including contact details and what information is needed. Tenants should describe the information they are seeking as clearly as possible to help us respond quickly and accurately.

We will acknowledge receipt of a STAIRS request promptly and usually within three working days. The acknowledgement will confirm that the request has been received and explain what will happen next.

We will respond to STAIRS requests within 30 calendar days of receipt. Where we need to seek clarification about the request, or to confirm the identity or authority of

the requester, the 30-day timeframe will begin once this information has been received.

In exceptional circumstances, it may be necessary to extend the response period. Where this applies, we will inform the tenant as soon as possible, explain the reason for the extension and provide a revised response date. Any extension will be reasonable and kept to a minimum.

Information published or disclosed under STAIRs will normally be provided in English. Where a tenant requests information in an alternative language or accessible format, we will take reasonable steps to meet that request and will not charge for this unless exceptional circumstances apply.

8.2.3 Handling and decision-making

When deciding what information to publish or disclose, we will take a balanced and proportionate approach. Information will be provided in full wherever possible and redaction will be used where appropriate so that information can still be shared whilst protecting data subject rights.

Information will not be disclosed where providing it would be unlawful. This includes situations where disclosure would breach data protection law, compromise confidentiality, create safety or security risks, or result in commercial harm. Decisions to withhold information will always be clearly explained.

8.2.4 Reasonableness and withholding information

Information may be withheld where:

- It contains personal data relating to identifiable individuals.
- It is commercially sensitive (e.g. supplier pricing or negotiations).
- It relates to legal advice or proceedings.
- It could pose a risk to health, safety or security.

When considering whether it is reasonable to withhold or redact information, we will have due regard to relevant information rights and data protection legislation. We will balance the factors in favour of disclosure against the likelihood and severity of any harm that may arise from disclosure.

This may include consideration of potential risks to individual safety, confidentiality, commercial interests or other lawful protections. Decisions will not take account of the identity of the tenant, the purpose of the request, or any perceived reputational impact.

Decisions will be made on a case-by-case basis and recorded clearly in the disclosure log. Where information is withheld or redacted, the reasons for the decision will be recorded and clearly explained to the tenant.

8.2.5 Refusing a request

A request may be refused in whole or in part where:

- The information requested is not held by SLH.
- The information is outside the scope of STAIRS as it does not relate to the management of social housing.
- Disclosure would be unlawful or it is reasonable to withhold the information following application of the reasonableness test.
- The request is unclear and clarification has not been provided despite reasonable efforts to assist.
- We are unable to confirm the identity of the tenant or their authorised representative.

Where a request is refused, we will explain the reason for the refusal and provide information about the tenant's right to request a review.

8.2.6 Charges and Costs

Information made available under STAIRS will normally be provided free of charge. In exceptional circumstances, where a tenant requests multiple copies of the same information or additional formats that incur significant reproduction or delivery costs, we may discuss reasonable charges with the tenant in advance. Any charges applied will be limited to recovering actual costs and will not be used to discourage access to information.

9. Record keeping and assurance

We will maintain clear and accurate records of STAIRS activity in our disclosure log.

This will include details of the requests received, decisions made, timescales met and the outcome of any reviews or complaints. This ensures transparency, supports accountability and provides assurance to governing bodies and the Housing Ombudsman.

10. Complaints

10.1 Right to complain under STAIRS

Tenants have the right to complain if they are unhappy with how we have met our obligations under the STAIRS. This includes concerns about the information published through the publication scheme or how an individual information request has been handled.

STAIRS complaints are managed separately from the general complaints process detailed in the customer feedback policy.

10.2 STAIRS review process

Before a complaint can be escalated externally, we must carry out a mandatory review.

Where a tenant raises a concern, we will review how the publication scheme or information request was handled and will consider whether the decision made was

lawful, proportionate and properly explained. We will provide a clear written response to the tenant within 30 calendar days of receipt of a valid request.

A request will be considered valid where:

- Sufficient detail is provided to identify the information requested.
- Identity and authority (where applicable) have been confirmed.

Reviews will be carried out by a colleague who was not involved in the original decision wherever possible, and who has appropriate seniority and understanding of the STAIRs requirements.

The review response will explain what information was provided or withheld, the reasons for any refusal or redaction, and the outcome of the review.

The STAIRs review process does not replace the Housing Ombudsman Complaint Handling Code but operates alongside it for information access matter

10.3 Escalation to the Housing Ombudsman

If a tenant remains dissatisfied following the STAIRs review, they have the right to escalate their complaint directly to the Housing Ombudsman.

The Housing Ombudsman will assess whether we have complied with the STAIRs requirements and whether decisions were supported by clear evidence and reasoning. Where the Ombudsman identifies maladministration or service failure, we will comply with any findings, recommendations or orders made.

11. Standards and performance monitoring

We will monitor compliance to ensure the policy is applied consistently, fairly and effectively.

We will monitor performance to confirm that:

- Information required under the STAIRs publication scheme is published and kept up to date
- Requests for information are handled within the required timescales
- Decisions to refuse or redact information are lawful, proportionate and properly explained
- Complaints and reviews are handled appropriately and learning is applied
- Performance information relating to STAIRs will be recorded and reviewed to identify trends, risks and areas for improvement.
- Monitoring activity may include:
 - The number and type of STAIRs requests received
 - Compliance with statutory response timescales
 - Outcomes of STAIRs reviews and complaints
 - Findings or recommendations from the Housing Ombudsman
- This information will be used to support transparency, drive improvement and provide assurance to senior management and the Board.

- Where issues or risks are identified, appropriate action will be taken. This may include updating guidance, improving training, revising published information or amending procedures.
- Assurance on STAIRs compliance and performance will be reported through appropriate governance and audit arrangements.

12. Statutory and legislative framework

We have developed this policy in line with the regulatory framework and legislative framework. It has been developed in line with the relevant regulatory standards, statutory duties and national guidance that apply to social housing providers.

This policy reflects the requirements set out in:

- The Social Housing (Regulation) Act 2023
- The STAIRs (STAIRs) policy statement
- The Regulator of Social Housing consumer standards, including the Transparency, Influence and Accountability Standard
- the Housing Ombudsman Scheme, including the Ombudsman's role in handling STAIRs complaints
- This policy also operates alongside wider information governance and data legislation, including:
 - UK General Data Protection Regulation (UK GDPR)
 - Data Protection Act 2018
 - Data Use and Access Act 2025 (DUAA)

The Data Use and Access Act supports the lawful use, sharing and access to data across public and regulated services. It does not remove the need to protect personal data or override existing information rights frameworks.

We will continue to apply UK GDPR, data protection principles and confidentiality safeguards when publishing or disclosing information under STAIRs.

This policy will be kept under review to ensure it remains compliant with changes to legislation, regulatory standards and statutory guidance.

13. Links with other policies & documents

This policy should be read in conjunction with, and will be supported by the following documents:

- Codes of conduct
- Financial regulations
- Declaration of interest policy
- Sponsorship policy
- Data protection policy
- Data Sharing procedure
- Information security policy
- Survey Procedure
- Speak up policy
- Data breach procedure
- Data subject procedure