



Social Tenant Access to Information Requirements (STAIRs) Policy

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Introduction

Empower Housing Association (EHA) are committed to providing high-quality services and putting tenant's needs at the heart of everything we do.

EHA specialises in providing homes across England for adults with disabilities, and being experts in this field allows us to focus on empowering our tenants to live as independently as possible. Our purpose is to provide specialised housing solutions that allow people to live independently enabling their ability to thrive.

This policy aims to ensure that tenants are able to access information from EHA as their landlord. The policy sets out how EHA will promote access to information through a formal publication scheme enabling tenants and tenants' representatives to access information proactively, and to support tenants to make information requests.

This policy sets out how EHA will comply with the government's Policy Statement entitled the Social Tenant Access to Information Requirements, or "STAIRs", ensuring transparency, openness and tenant empowerment in being able to hold their landlord to account.

Scope of the Policy

This policy applies to all colleagues of EHA and any third parties contracted to provide social housing management services by EHA as the Private Registered Provider (PRP).

STAIRs cover the publication of information, responding to information requests, reviews and complaints from tenants or their designated representative. Requests for review may also be made by former tenants where the information relates to their tenancy and a request for information was made while they were still a tenant.

The Policy

This policy is based on the Social Tenant Access to Information Requirements (STAIRs) introduced under the amended Transparency, Influence and Accountability (TIA) Consumer Standard issued by the Regulator of Social Housing (RSH).

The Ministry for Housing Communities and Local Government (MHCLG) has issued a Direction to the RSH requiring it to introduce a new Consumer Standard enabling tenants to access information held by PRPs. The RSH has issued an amended TIA 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 and their designated representative to be able 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.

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.

*[Social Tenant Access to Information Requirements: policy statement - GOV.UK](https://www.gov.uk/government/policies/social-tenant-access-to-information-requirements)

The 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 as follows:

- Governance and decision making
- Finance and spending
- Housing stock management
- Performance
- Housing services and tenant liaison
- Lists and registers
- Social housing management

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. The National Housing Federation in conjunction with Anthony Collins Solicitors provide further guidance: [STAIRs guidance - NHF and Anthony Collins 2026](#)

Chapter 2 of STAIRs sets out that tenants (or their designated representative) may make a request for relevant information to their provider. Relevant information is defined as information relating to the management of a registered provider's social housing.

Providers should proactively respond to requests within 30 days, unless there are reasonable grounds to withhold information, such as where the information amounts to a protected class of information under freedom of information or data protection (or other) laws or where the harm caused by the disclosure would outweigh the benefit in the provider disclosing the information.

Providers should provide information irrespective of the reasons for the request or how the information may be used following disclosure and should 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.

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, the tenant or their representative should contact EHA's Housing Management

*[Social Tenant Access to Information Requirements: policy statement - GOV.UK](#)

team to discuss their requirements. EHA is committed to ensuring that information is made available in a way that is as accessible as possible for all our tenants.

- a. Publication Scheme (Chapter 1) EHA's 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.
- b. Information Requests (Chapter 2) Our process for handling information requests is set out at Annex 2 to this policy. EHA will maintain a log of all information requests and timelines for responding to requests for reporting and accountability purposes.

Out of scope/Withheld information

EHA 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, EHA will consider if the information comes within the classes of information set out in Table 1 of the Policy Statement. It may be necessary to redact documents prior to publication.

Some suggested categories of information which may be out of scope of STAIRs are detailed at Annex 1, but is not exhaustive. When considering an information request under Chapter 2 EHA will consider whether any information may need to be withheld or redacted in response to a request.

Any withholding or redaction of information must be reasonable and in line with the principles set out in paragraphs 14 – 16 of the Policy Statement. 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.

If, on receipt of any response in relation to a tenant request, the tenant considers that information has been redacted or withheld without a reasonable basis for doing so, EHA will refer the tenant to EHA's review process set out below.

The response to request for information will be provided electronically unless the tenant has specifically requested information in hard copy.

Review and Complaints Process

If a tenant considers that EHA has not published information or responded to a request for information appropriately or they are otherwise dissatisfied with the handling of a request the tenant should contact admin@empowerhousing.org.uk to request a review. A request for a review should generally be made within 3 months of receipt of the original decision. The purpose of any review will be to assess:

- i. how EHA have responded to a 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 someone believes they may be entitled to;
- iii. where we have not complied with timelines for responding to a 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 the tenant disagrees with our decision and reasons for this.

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We will acknowledge a review request within 5 working days including the day of receipt and carry out an internal review of how we have handled a request aiming to respond to a complaint 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 the tenant know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

If a tenant is not happy with EHA's response to a review request, the tenant is able to escalate their complaint directly to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme (HOS) Part 2B Social Tenant Access to Information Requirements. The Ombudsman's complaints scheme is available at <https://www.housing-ombudsman.org.uk/residents/bring-your-complaint-to-the-housing-ombudsman/>

Any complaint to the Ombudsman should generally be made within 3 months of the outcome of a review having taken place.

Only matters relating to STAIRs (i.e. 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.

If a concern relates to an alleged breach of data protection legislation the tenant should inform EHA that their issue concerns a data protection complaint, which would then be dealt with via our usual complaints process for data protection matters.

Data Protection and Security

Data protection laws are directly applicable to housing providers. This means that where any information requested amounts to personal data or may not be identifiable personal data in isolation but could amount to identifiable personal data when combined with other information, this information may be withheld from disclosure in compliance with data protection laws. Any requested information which amounts to personally identifiable data will not be disclosable under STAIRs but may be disclosed under data protection laws as a subject access request, where information is sought by the tenant about themselves. Where we consider that a request amounts to a request for personal data, we will process the request in line with our Subject Access Requests policy available via our website.

Information as to how we handle personal data, can be found in EHA's Data Privacy Notice (Tenants) on EHA's website.

Responsibilities

Overall responsibility for this policy and organisational compliance lies with Director of Housing and Growth; day to day implementation of this policy lies with the Housing Manager. All colleagues are required to familiarise themselves with the wording and obligations detailed under this policy.

Related Legislation, Regulation and Codes of Practice

- Social Housing (Regulation) Act 2023
- Regulator of Social Housing (RSH) Consumer Standards:
- Social Tenant Access to Information Requirements MHCLG Policy Statement
- Transparency, Influence and Accountability Standard
- Housing Ombudsman Scheme
- Data Protection Act 2018

*[Social Tenant Access to Information Requirements: policy statement - GOV.UK](#)

- Data (Use and Access) Act 2025
- Equalities Act 2010
- NHF Code of Conduct 2026
- STAIRS Guidance – NHF and Anthony Collins Solicitors 2026

Related Policies, Procedures and Documents

- Reasonable Adjustments Policy
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Complaints and Feedback Policy
- Data Protection Complaints Procedure
- Competence and Conduct Policy
- Data Privacy Notice (Tenants)
- STAIRS Procedure

Reporting and Monitoring

A log of Information requests and review requests will be maintained

Quarterly reporting to Board of:

- Information Requests and themes
- Reviews and Complaints – Publication Scheme and Information Requests

Audits of the scheme will be included within the internal audit timetable.

Consultation and Publicising Policy

EHA has used a number of methods of consultation:

- EHA has also undertaken specific consultation with EHA tenants and their advocates
- EHA Managers have reviewed the policy and commented
- The policy will be published on EHA website and made available in alternative formats as required and requested

Review

The policy and the STAIRS scheme will be reviewed annually or sooner if there is a change in regulation, legislation or codes of practice.

Equality Impact Assessment

An Equality Impact Assessment has been completed.

*[Social Tenant Access to Information Requirements: policy statement - GOV.UK](#)

Annex 1

EHA's Publication Scheme

This Annex sets out the basis on which EHA will proactively publish information relating to the management of its social housing function. We are committed to being open and transparent about the way we work, the services we provide and the decisions we make.

The information covered by this scheme is included in the classes of information set out in the table below, where this information is held by us. The table sets out a non-exhaustive list of classes of information we routinely publish, how to access them, and any applicable charges. Much of the information may already be freely available on our website.

We publish information within each class which is up to date and correct as at the date of publication and for the previous two financial years, unless stated otherwise.

We have also included a list of types of information which may be out of scope of Table 1 and not subject to inclusion in our publication scheme.

This Scheme will be reviewed annually

How will relevant information under STAIRs be published?

Information will be available on our website at [Home Page - Empower Housing Association](#) and will be regularly updated.

Formats other than online

We are committed to making information listed in our Publication Scheme available free of charge online. If information is required to be provided in an accessible alternative format, we also commit to providing a single copy of this information free of charge.

However, where an individual requests additional copies of information, we may apply charges strictly to cover the actual costs incurred in providing additional copies.

2. Alternative Formats

If information is requested in an alternative accessible format (e.g., large print, Braille, audio format), we will provide the information free of charge.

We will also provide one translated copy of any information you request free of charge.

3. No Charge for Inspection

Information may be inspected at our offices by appointment free of charge. Please contact us to arrange an appointment.

Tenant Feedback on this Publication Scheme

Tenants can provide suggestions for improvements to this Scheme via:

- Email to admin@empowerhousing.org.uk

*[Social Tenant Access to Information Requirements: policy statement - GOV.UK](#)

Reviews

Should a tenant consider that we have not included information in our publication scheme, or that we have unduly redacted information which they consider ought not to be redacted, they can request a review at admin@empowerhousing.org.uk. We will normally complete a review within 30 days.

If they remain dissatisfied with the outcome of the review they can contact the Housing Ombudsman at: <https://www.housing-ombudsman.org.uk/residents/bring-your-complaint-to-the-housing-ombudsman/>

EHA's Publication Scheme – Classes of Information

Class of Information	Information Typically Included
Governance and decision making Information in this class is published as at the current date. Information relating to tenant consultations and meetings published for the current and previous two financial years.	Types of information your organisation should include here may include links on your website to: • About us [Documents setting out information relating to: Mission statement; vision and values; corporate objectives]. • Our group structure [Documents containing your organisational structure charts identifying senior members of the organisation and key individuals – e.g. fire safety principal accountable person] • Our board [Documents listing your board members (including executive and non-executive members)]. • Our committees [Documents listing your key decision-making committees and their executive functions]. • Our Executive Team [Your senior management team with biographies] • Our decision-making processes [Documents setting out your constitution and articles of association / standing orders / other organisational governing documents]. • Tenant consultation documents [e.g. newsletters; meeting agendas and minutes; your tenant participation strategy; resident engagement policies] • Board papers [Documents listing a public version of your board papers, agendas and meeting minutes]. • Key documents relating to strategic decision making by the board [e.g. merger-related information highlighting strategic plan/rationale; impact assessments; due diligence considerations.]
Finance and spending Information in this class is published for the current and previous two financial years.	• Audited accounts and financial statements [Will contain details about spending, grants and use of service charge revenue]. • Rent collection; rent rates. • Procurement procedures relating to the acquisition of goods and services designated for the provision of housing management services. • Contracts and tenders that exceed £500 for housing management services.

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	• Merger related transaction / integration costs (headline costs); financial risk assessments (as part of published plans)
Housing stock management	• Corporate Plans and Objectives [Documents setting your corporate strategy with a copy of the plans available for download, relating to the management of your housing stock and strategic goals for your organisation, including (not an exhaustive list): -Decent homes. -Planned investment programme -building sustainable homes. -Estate management strategy. -Maintenance work and repairs. -Environmental information and progress towards net zero. -Social investment strategy. -Resident engagement strategy]. • Stock profile and transfers [Details of any asset transfers (whether purchase or sale) in the last [12] months and any anticipated asset transfers within the next [12] month period]. • Property conditions and improvements to property [Details of maintenance and repairs works carried out over the last [12] months and response times]. • Stock/asset condition data (as required by RSH consumer standards) [Data required by RSH – home types; rent levels; tenant satisfaction metrics; lettings and sales; stock condition survey programmes; compliance]
Performance Information in this class is published for the current and previous two financial years.	• Inspections outcomes and ratings. [Any audits or reports from the Regulator of Social Housing, Housing Ombudsman decisions]. • Performance reviews and evaluation reports, internal/external audits. [Audits undertaken by internal teams and publishable external audits undertaken by consultants/professional services firms;]. • Tenant Satisfaction Measures/Annual reports to tenants. [You are already likely to publish these, to include link to website where available]. • Media releases. [Include links to news sections of your website and any charitable activities on behalf of your organisation]. • Complaints handling, procedures and performance metrics; service standards. [Include links to your reports regarding complaints handling and performance and any Housing Ombudsman Self-Assessments]. • Information request / data breach data. [Include a copy of your disclosure log as updated (removing any personal identifiable data)]. • Health and safety performance and assessments. [To provide links to any organisational health and safety risk assessments to the extent these may be publishable without risk of harm to any individual]. • Number of evictions. [To include link to your reports on evictions and reasons for evictions without including any personally identifiable data].

	• Compensation and redress. [Documents relating to internal outcomes for tenants and residents and Housing Ombudsman orders and other outcomes from legal claims]. • Awaab's law compliance – Reports on response times for emergency and significant hazards. [All reports on response times for dealing with emergency and significant hazards under Awaab's law]. • Number of decants over a [12] month period. [To publish information held relating to volume of decants to temporary alternative accommodation].
Housing services and tenant liaison Information in this class is published as at the current date.	• Description of services, advice, and guidance for tenants. [To include links to all your documents providing advice and guidance to your tenants and residents – these may vary from one organisation to another but should point to the link on your website where tenants can go to for any advice about their property and any tenant liaison groups and services].
Lists and registers Information in this class is published for the current and previous two financial years	Information held in registers required by law: • Gas safety registers. [Evidence of gas safety checks for properties but not at an individual level]. • Fire safety risk assessments (for communal and multi-occupied buildings). Electrical safety (EICR) records. • Asbestos register (for communal areas of residential buildings). • Water hygiene logs / legionella risk assessments (inspection logs and risk assessments for hot/cold water systems). Building safety performance documents and inspection outcomes. Other lists and registers relating to the management of social housing, e.g.: • Damp and mould case tracking reports (other than at a per property level). • Estate inspection schedules. • Home accessibility / adaptations register
Social housing management	• Policies and strategies relating to the management of social housing. • [This section should contain a full list of all your policies that impact on tenants' rights and duties. It is likely that you will already publish this on your website. The following list contains examples of these (not an exhaustive list)]. • Aids and adaptations. • Anti-social behaviour and adverse behaviours e.g. domestic abuse policy; hate incidents. • Building safety. • Arrears. • Compensation. • Complaints / customer care. • Communal spaces. • Customer safeguarding. • Damp and mould. • Decant. • Disrepair. • Fire safety. • Fraud.

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	• Income management. • Leasehold management. • Neighbourhood and estate management. • Pets. • Parking. • Rent. • Repairs and maintenance. • Moving and allocation (other than local authority allocation). • Shared ownership. • Service charges. • Succession. • Tenancy. • Water safety
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SUGGESTED CATEGORIES OF OUT OF SCOPE INFORMATION	EXAMPLES OF TYPES OF INFORMATION (NOT AN EXHAUSTIVE LIST)
Internal business or commercial activities	Contracts or agreements unrelated to the provision of housing management services (eg payroll services). • HR policies unrelated to social housing management (e.g. disciplinary policy). • Finance policies governing day to day business operations unrelated to the provision of housing management services. • Investment strategies relating to non-social or private housing. • Information which relates to internal discussions and the development of internal policy and strategy before board approval ("pipeline" information)
Matters decided by local authorities	• Housing allocations. • Homelessness assessments. • Housing benefit or council tax-related decisions. • Planning applications and planning enforcement actions.
Non-social housing management function	• Service charges for non-social housing. • Commercial lease management. • Repairs or safety data for market rent homes. • Private rented sector portfolios managed for profit
Property that is not social housing	Leasehold properties. • Shared ownership schemes where shared owner has staircased to own 100% of property equity. • Shops; offices; community centres. • Moorings, storage units or other non-residential lets. • Any build-to- rent or for-profit schemes held separately from the PRP.
Wider activities unconnected with social housing	• Group level commercial ventures – e.g.: renewable energy subsidiaries; trading companies; joint ventures for private sale developments. • Care and support contracts delivered on behalf of local authorities (for care and support only). • Commercial investment or treasury activities

Annex 2

Responding to Information Requests

Who can make requests?

EHA will respond to Information requests that are made either by a registered tenant with us, or by their designated representative (the scheme is not open to either former or prospective tenants). EHA will only respond to requests where it can confirm the identity of the requesting tenant and their representative (where appointed). There are no restrictions on tenants as to whom they may choose as their representative.

We will accept requests that are made in writing, including either by email or text message, as long as we can identify who the requester is. The request does not have to specifically mention “STAIRs” for it to be considered under the scheme, as long as the request is made in writing and we are able to identify the author.

We recognise that certain tenants may require additional support to make a request, and we will ensure that appropriate arrangements are in place to support all tenants to be able to exercise their rights under STAIRs.

How long will it take us to respond?

We will provide an acknowledgement of receipt of a request within 5 working days of receipt including the date of receipt.

We will respond to a request within 30 calendar days from receipt of a request, or where the request requires clarification, 30 days from receipt of the clarification. EHA will take reasonable steps to assist tenants and their representatives where any request requires clarification.

In exceptional circumstances it may be necessary to extend the timeline for a response. Where this is necessary EHA will inform the tenant at the earliest opportunity. Every effort will be made to respond in a reasonable timeframe where any extension is required.

If there is likely to be any delay in providing a response, we will ensure that we provide the tenant with a reason for the delay together with our best estimate as to when they may be likely to receive a response.

Obtaining information from third parties

It may be the case that the requested information is held by a third party responsible for the management of social housing on our behalf. If this is the case EHA will use all reasonable endeavours to obtain the information, taking account of our duty to comply with the requirements balanced against the need for a proportionate approach and the availability of resources. We will keep logs of our contacts where it is necessary to reach out to third parties for the information.

Refusing to respond to Information Requests

We may refuse to respond to an information request where:

- It is reasonable to withhold the information from disclosure.

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- 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).
- The identity of the tenant (or that of your representative) cannot be established.
- The meaning of the request is not clear, and the tenant has not responded to our reasonable efforts to seek clarification.
- The information requested is excluded on the basis that it is not relevant information (i.e. does not come within the scope of an information request under STAIRs).
- The work involved in responding to the request would exceed 18 hours of colleague time.
- The request is excessive, in that it is repeated (including where we receive repeated requests from multiple tenants acting in coordination or seeking the same information).
- The request is offensive or communicated in an abusive manner or is clearly intended to otherwise cause disruption to our organisation.

We may also redact information where it is appropriate and reasonable to do so.

What does “reasonable” mean when responding to requests?

When considering whether it is reasonable to withhold any information in response to a request, we are required to have “due regard to” freedom of information and data protection laws (and any other relevant statutes). We are also required to balance factors favouring disclosure against the likelihood of any harm arising from the disclosure.

In having “due regard” we must ensure that we give proper consideration to whether the information falls within a class of information under freedom of information and data protection laws and whether releasing the relevant information could cause harm. “Due regard” means that EHA must consider or take account of a legal principle or legislation, but it does not mean that we have to follow that principle automatically. We should be able to justify why we consider that protected class under Freedom of Information Act (FOIA) (or other relevant laws) may apply to the request and record our reasoning.

We will start from the presumption that the information should be disclosed in response to a request unless the information is such that the factors in favour of withholding (or redacting) the information outweigh the benefits of making the information available.

Factors we will take into account when considering the likelihood of harm being caused by the disclosure will include:

- Type of harm – physical, mental, financial, or operational / commercial.
- Severity – how serious could the harm be?
- Likelihood – is harm speculative, possible, or reasonably likely?
- Harm to third parties – e.g., other individuals, third party organisations, whether or not the information is in the wider public interest to disclose or withhold.

For example, there is often a public interest reason in withholding information on the basis that there is a:

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- Need to ensure confidentiality around formulation of decisions and pipeline discussions or protect a negotiating position.
- Need to ensure value for money and maintain competitive position in a market.
- Need to ensure the health and safety of any individual or prevent disclosure of information which could prejudice any investigation.

We are also required to take into account that where the relevant information was provided by or relates to a third party, we must consider the views of that third party regarding the likelihood of any harm. When assessing the risk of harm, our approach is that the reference to “third party” here means any third party or individual (i.e. not solely a body responsible for the management of social housing instructed on our behalf).

In addition, we are not obliged to disclose information under STAIRs where we already provide disclosure of relevant information pursuant to other statutory provisions (for example, we are legally required to provide to Companies House information about our corporate activities, such as the filing of our annual return).

What other factors will we take into account when disclosing information?

When considering whether or not to disclose relevant information we will not take into account the identity of the tenant nor any purpose to which that information may be put as relevant factors as to whether the information ought to be disclosed. Nor will we take account of any reputational risk or negative public interest for us which may be either caused or inferred by reason of any disclosure. EHA will ensure that information is published in the spirit of openness and transparency as laid down by the scheme.

Where we either withhold information from disclosure, or we provide information but with redactions we will explain our reasons for this as part of our response. If it is necessary to extend the timelines for a response where we need to consider whether withholding or redacting information is required, we will let you know as soon as possible, together with our likely timeline to provide you with a response.

When disclosing information, we will take all reasonable steps to ensure that information is provided in a format which is accessible to the tenant.