

Title:	Social Tenant Access to Information Requirements Policy
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Document management		
Version	Date amended	Amendments
1	July 2026	Original version of the policy.

1. Policy Aim

- 1.1 This policy aims to ensure residents can access information from their landlord. It details how South Lakes Housing (SLH) will promote access through responding to information requests as well as via a formal publication scheme, allowing residents and their representatives to access information proactively.

2. Purpose

- 2.1 This policy sets out how SLH will comply with the Government Policy Statement entitled the Social Tenant Access to Information Requirements, or “STAIRs”. The purpose of STAIRs is to ensure transparency and openness in the delivery of social housing services, empowering residents to hold their landlord to account.

3. Definitions

- 3.1 The STAIRs regime is available to current tenants, licensees, shared owners (owning less than 100% of the property equity) and any other persons in a landlord tenant relationship with a registered provider. In this

policy the term 'resident' is used to collectively describe the groups listed above who are eligible to make requests under the scheme.

- 3.2 Where the term 'we' is used within the appendices of this policy it refers to South Lakes Housing.

4. Scope

- 4.1 This policy applies to all employees of SLH.
- 4.2 STAIRs cover the publication of information, responding to information requests, and reviews and complaints.

5. Regulatory Framework

- 5.1 This policy is based on the Social Tenant Access to Information Requirements (STAIRs) introduced under the updated Transparency, Influence and Accountability Consumer Standard issued by the Regulator of Social Housing (RSH). Under the updated standards, Registered Providers are required to comply with the STAIRs Policy Statement, published by the Ministry of Housing Communities and Local Government (MHCLG). The Policy Statement sets out requirements for providers to:
- Issue a Publication Scheme from 1 October 2026
 - Respond to information requests from residents and their representatives from 1 April 2027
- 5.2 STAIRs is designed to enable residents and their designated representative to be able to access information which supports residents 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 residents.

6. Policy Principles

- 6.1 The key principles SLH will adhere to in the implementation of STAIRs are transparency, openness, accountability and resident involvement in how services are delivered.
- 6.2 Under the STAIRs publication scheme, SLH must proactively publish information held which falls within one or more of the defined classes of information set out in the MHCLG Policy Statement. SLH takes a proactive approach and has identified the documents and information to publish under each class. This will be reviewed on a quarterly basis.
- 6.2 Under the STAIRs information request scheme, SLH must respond to requests from residents for relevant information relating to the management of SLH's social housing. SLH will respond to requests within 30 days, unless there are reasonable grounds to withhold information or extend the timescale (see Appendix B).

7. The Requirements

- 7.1 Appendix A of this policy outlines the classes of information SLH publish under STAIRs and how the information is published. Appendix B outlines SLH's process in relation to handling STAIRs information requests.
- 7.2 SLH is committed to ensuring information is made available in an accessible way. Requests from residents for information to be provided in a non-electronic format are considered by the Governance Team and are accommodated where reasonably practicable.
- 7.3 SLH maintains a log of all information requests and timelines for responding to requests for reporting and accountability purposes.

8. Out of Scope / Withheld Information

- 8.1 SLH is not required to create new information to comply with either the publication scheme or information requests.
- 8.2 When assessing whether certain information should be published, SLH will consider whether the information comes within the classes of information set out in the MHCLG STAIRs Policy Statement.
- 8.2 In processing a STAIRs information request, SLH will consider whether any information may need to be withheld or redacted. Any withholding or redaction of information must be reasonable and in line with the principles set out in paragraphs 14 – 16 of the MHCLG Policy Statement.
- 8.3 Appendix B of this policy sets out how SLH respond to requests for information and how "reasonableness" is considered when assessing whether information should be withheld or redacted.

9. Review and Complaints Process

9.1 Review

- 9.1.1 SLH operate a process whereby residents are able to request a formal review of the handling of their information request or the approach taken by SLH under the STAIRs publication scheme.
- 9.1.2 Residents are entitled to request a review in the following circumstances:
- Where they consider SLH holds information that falls within the scope of the STAIRs publication scheme and has not been made available
 - Where they are dissatisfied with the handling of SLH's response to their STAIRs information request
 - Where they believe information has been withheld or redacted by SLH without a reasonable basis for doing so as part of the

publication scheme or in response to their STAIRs information request.

- 9.1.3 The review will be carried out by an SLH colleague with appropriate seniority and independence. The review may consider:
- how SLH responded to the request for information;
 - whether SLH have not published relevant information that may be held;
 - whether SLH have complied with required timelines for responding to an information request;
 - whether SLH have either withheld or redacted relevant information from disclosure.
- 9.1.4 SLH will process all review requests which are made within 12 months of receipt of SLH's original response in relation to information requests. Consideration will be made on a case by case basis as to whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.
- 9.1.5 Upon receipt of a request for review, SLH will consider the request, carry out appropriate investigation and provide a full response within 30 calendar days. It may be necessary in exceptional circumstances to extend the timeline for a response – if this is necessary, the individual making the request will be informed at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

9.2 Complaints

- 9.2.1 Following the outcome of the review process, individuals who remain dissatisfied may choose to escalate their complaint directly to the Housing Ombudsman. Details of the Housing Ombudsman's STAIRs complaints scheme are available at <https://www.housing-ombudsman.org.uk/app/uploads/2026/07/Housing-Ombudsman-Scheme-October-2026-.pdf>. Any complaint to the Ombudsman should generally be made within 3 months of the outcome of SLH's review.
- 9.2.2 Only matters relating to STAIRs can be addressed as part of a STAIRs review process and then by complaint to the Housing Ombudsman. If a resident's concern relates to an alleged breach of data protection legislation, this will be dealt with via SLH's usual complaints process for data protection matters, as outlined in SLH's Complaints Policy.

10. Data Protection and Security

- 10.1 Where any information requested amounts to personal data, this information may be withheld from disclosure in compliance with data protection laws.
- 10.2 Any requested information which amounts to personally identifiable data is not disclosable under STAIRs but may be disclosed under data protection law as a subject access request, where information is sought by a data

subject about themselves. Such requests are processed separately in line with SLH's procedure on Handling Information Rights Requests.

11. Responsibilities

- 11.1 Overall responsibility for this policy lies with the Deputy Chief Executive, who is also SLH's Data Protection Officer. Day-to-day implementation of this policy lies with the Governance & Risk Manager. All staff are required to familiarise themselves with the wording and obligations listed under this policy.

12. Monitor and Review

- 12.1 This policy and the STAIRs scheme will be reviewed regularly to ensure accuracy and compliance. SLH's compliance with the requirements of the scheme, including key performance information, will be reported to Audit and Risk Committee on a quarterly basis.
- 12.2 This policy will be formally reviewed every three years. It may also be reviewed earlier where there are significant changes to legislation, regulation, or organisational requirements.

Appendix A – Model Publication Scheme

1. Introduction

- 1.1 This appendix sets out the basis on which South Lakes Housing ("we") 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.
- 1.2 The information covered by this scheme is outlined in the classes of information set out in Table 1. The table sets out a non-exhaustive list of classes of information we routinely publish.
- 1.3 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.
- 1.4 Examples of information categories which are considered to be out of scope from the publication scheme are detailed in Table 2. Please note this list is not exhaustive.
- 1.5 This scheme will be reviewed at least on an annual basis.

2. How will relevant information under STAIRs be published?

- 2.1 Information will be available on our website at [Social Tenants Access to Information Requirements \(STAIRs\) | South Lakes Housing](#) and will be regularly updated.

3. Formats other than online

- 3.1 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.
- 3.2 Where an individual requests additional copies of information, we may apply charges strictly to cover the actual costs incurred in providing additional copies. Information may be inspected at our offices by appointment free of charge.

4. Resident Feedback on this Publication Scheme

- 4.1 Resident feedback on SLH's publication scheme is welcomed and can be provided via any of SLH's existing communication channels.

Table 1: Publication Scheme Template

Class of Information	Information Typically Included
Governance and Decision Making	• About us • Organisational structure • List of Board Members and Committee Members • Senior Management Team Biographies • Our decision-making processes • Key resident consultation documents • Board paper, agenda and meeting summaries • Key documents relating to strategic decision making by the Board
Finance and Spending	• Audited accounts and financial statements • Rent collection and rent rates • Procurement Procedures • Contracts and tenders that exceed £500 for housing management services • Headline costs relating to any merger activity

	• Financial risk assessments
Housing Stock Management	• Corporate plans and objectives • Stock profile and detail of any asset transfers • Property condition and improvements- performance • Stock/Asset condition data
Performance	• Inspection outcomes and ratings • Performance reviews, evaluation reports and information relating to internal/external audits • Tenant Satisfaction Measures • Annual Reports • Media releases • Complaints handling- procedures, performance metrics and service standards • Logs of data breaches and information requests • Health and Safety performance and assessments • Number of evictions • Compensation and redress • Awaabs' Law compliance • No. decants over a 12 month period
Housing Services and Resident Liaison	• Description of services, advice and guidance for residents
Lists and Registers	• Evidence of Gas Safety checks • Fire risk assessments for communal and multi-occupied buildings • Electrical safety records • Asbestos register (for communal areas of residential buildings) • Water hygiene logs/legionella risk assessments (for hot/cold water systems) • Building safety performance documents and inspection outcomes • Damp and mould case tracking reports (not at property level) • Estate inspection schedules
Social Housing Management	• Policies and Strategies relating to the management of social housing

Table 2: Out of Scope Information

Suggested categories of out of scope information	Examples
Internal business or commercial activities	• Contracts or agreements unrelated to the provision of housing management services • HR policies • Finance policies • Investment Strategies relating to non-social housing • Information relating to internal discussions and the development of internal policy/strategy before Board approval
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
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, other non residential lets
Wider activities unconnected with social housing	• Group level commercial ventures • Care and support contracts delivered on behalf of local authorities • Commercial investment or treasury activities

Appendix B - Responding to Information Requests

1. Who can make Requests?

- 1.1 South Lakes Housing will respond to information requests that are made either by one of our residents (noting exclusions outlined in Section 3.1 of

the main policy), or by their designated representative. The scheme is not open to either former or prospective tenants. SLH will only respond to requests where it can confirm the identity of the requesting resident and their representative (where appointed). There are no restrictions on residents as to whom they may choose as their representative.

- 1.2 We will accept requests that are made in writing, including by email, text message and social media, as long as we can identify who the resident making the request is.
- 1.3 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 resident.
- 1.4 We recognise that some residents 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.

2. How long will it take us to respond?

- 2.1 We will provide an acknowledgement of receipt of a STAIRs information request to the enquirer within 3 working days of receipt.
- 2.2 We will respond to the request within 30 calendar days from receipt of the request, or where the request requires clarification, 30 days from receipt of the clarification. SLH will take reasonable steps to assist residents and their representatives where any request requires clarification.
- 2.3 In exceptional circumstances it may be necessary to extend the timeline for a response. Where this is necessary SLH will inform the enquirer at the earliest opportunity. Every effort will be made to respond in a reasonable timeframe where any extension is required.
- 2.4 If there is likely to be any delay in providing a response we will ensure that we provide the enquirer with a reason for the delay together with our best estimate as to when they may be likely to receive a response.

3. Refusing to respond to Information Requests

- 3.1 We may refuse to respond to an information request where:
 - It is reasonable to withhold the information from disclosure.
 - 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 resident (or that of their representative) cannot be established.
 - The meaning of the request is not clear, and the individual making the enquiry 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 staff time.
- The request is excessive, in that it is repeated (including where we receive repeated requests from multiple residents 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.

4. What does ‘reasonable’ mean when responding to requests?

- 4.1 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.
- 4.2 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.
- 4.3 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.
- 4.4 For example, there is often a public interest reason in withholding information on the basis that there is a:
- 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.

4.5 We are 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.

4.6 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).

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

5.1 When considering whether or not to disclose relevant information, we will not take into account the identity of the resident 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 into account of any reputational risk or negative public interest for us which may be either caused or inferred by reason of any disclosure. SLH will ensure that information is published in the spirit of openness and transparency as laid down by the scheme.

5.2 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 and ensure it is recorded. 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 the individual making the request know as soon as possible, together with our likely timeline to provide you with a response.

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

6. Learning from Information Requests

6.1 Once a request has been responded to, SLH will consider whether there are any implications for the publication scheme. Specifically, whether any of the information shared in the request response should be made available to all residents via the publication scheme. This process is designed to promote continuous development of SLH's publication scheme.