Social Tenant Access to Information Requirements (STAIRs) Policy

Version Number	1
Date Applies From	01/10/2026
Policy Owner	Deputy CEO
Next Review Date	01/10/2029
Strategy Link	• Customer Strategy • Resources Strategy

Key connected legislation/regulation:

- Social Tenants Access to Information Requirements (STAIRs)
- General Data Protection Regulation (GDPR)
- Data Protection Act

Annual Checks

Policy owners should ensure that an annual check of hyperlinks, roles, and names is undertaken. These checks are in addition to formal review process. Please see Policy and Procedure framework guidance for further details.

If you need this information in an alternative language please call

0161 605 7260

For other formats please call

0300 123 5522

Introduction

This policy sets out how ForHousing will comply with the Social Tenant Access to Information Requirements ("STAIRs"), ensuring transparency, openness and tenant empowerment in being able to hold their landlord to account.

STAIRs is important to ForHousing because transparency and tenant empowerment are at the heart of our commitment to delivering excellent social housing services. The policy enables tenants to access information about how their homes are managed, giving them the tools to scrutinise our performance and hold us to account.

For our customers and colleagues, this policy means that tenants can proactively access published information about our social housing activities and, from April 2027, submit formal requests for information. Colleagues across the organisation must understand and support the requirements of STAIRs to ensure we meet our obligations and respond to tenants promptly and transparently.

Scope of Policy

This policy applies to all employees of ForHousing and any third parties contracted to provide social housing management services on our behalf as the Private Registered Provider (PRP). STAIRs covers the publication of information, responding to information requests, and reviews and complaints.

Regulatory Framework

This policy is based on the STAIRs Policy Statement issued by the Ministry of Housing, Communities and Local Government (MHCLG) on 30 September 2025. MHCLG has issued a Direction to the Regulator of Social Housing (RSH) requiring it to introduce a new Consumer Standard enabling tenants to access information held by PRPs. RSH has issued an amended Transparency, Influence and Accountability (TI&A) Standard under which PRPs must comply with the STAIRs Policy Statement.

STAIRs has two key phases:

- Chapter 1 (Publication Scheme) takes effect from 1 October 2026
- Chapter 2 (Information Requests) takes effect from 1 April 2027

Policy Principles

STAIRs takes a principles-based approach in line with RSH Consumer Standards. Key principles include: transparency, openness, accountability, and tenant involvement in how their services are delivered. The emphasis of the Policy Statement is in favour of disclosure. ForHousing will take a proactive approach to publication and will consider that information ought to be published unless there is a good reason why it should not be.

Chapter 1 – Publication Scheme (from 1 October 2026)

ForHousing will proactively publish information relating to the management of its social housing function across seven broad classes of information: governance and decision-making; finance and spending; housing stock management; performance; housing services and tenant liaison;

lists and registers; and social housing management policies. A detailed Publication Scheme template is available on our website and sets out the specific types of documents we publish under each class.

Information will generally be published on our website and kept up to date. Information is generally made available free of charge. Where information is required in a non-electronic format, we will accommodate reasonable requests. ForHousing is not required to create new information to comply with the publication scheme.

Documents may be redacted prior to publication where it is appropriate and reasonable to do so. The balance should always be in favour of disclosure unless there is a good reason to redact. Decisions to redact or exclude information will be recorded. Tenants may request a review if they consider information has been unreasonably withheld from the publication scheme.

Chapter 2 – Information Requests (from 1 April 2027)

Current tenants (or their designated representative) may submit a request for relevant information relating to the management of ForHousing's social housing. The scheme is not available to former or prospective tenants. Requests must be made in writing, including by letter, email, text message, social media, or through our website, provided the tenant can be identified. Requests do not need to specifically reference "STAIRs". ForHousing will make reasonable efforts to support tenants who are unable to make a written request due to disability or other need.

ForHousing will acknowledge receipt of a request within three working days and will respond within 30 calendar days from receipt (or from receipt of any required clarification or identity verification). Where a request is for information that can be dealt with as "business as usual", we will do so, informing the tenant of their right to request a formal STAIRs response if preferred.

ForHousing may extend the 30-day response period only in genuinely exceptional circumstances (for example, a serious cyber-attack causing disruption to services). Any extension will be reasonable and the tenant will be informed promptly of the reason and expected response date.

Out of Scope and Withheld Information

ForHousing may withhold or redact information where it is reasonable to do so. When considering reasonableness, we will have due regard to protections in freedom of information and data protection legislation, and will balance factors favouring disclosure against the likelihood of harm. We will not take into account the identity of the tenant, their reasons for the request, or any reputational risk to ForHousing.

Information that is out of scope includes: matters decided by local authorities (e.g. housing allocations, homelessness assessments); information not relating to social housing management (e.g. market-rent properties, commercial leases); wider activities unconnected with social housing; and draft or archived documents. Information may also be withheld where it constitutes personal data, is commercially confidential, is legally privileged, or where its disclosure would cause harm. Where we refuse a request, we will explain our reasons and inform the tenant of their right to seek a review.

ForHousing may refuse a request where: it would take longer than 18 hours of staff time to

respond; the request is repeated or substantially similar to a prior request without a reasonable interval having elapsed; or where the request is offensive, abusive, or clearly intended to cause disruption.

Data Protection

Data protection laws are directly applicable to ForHousing. Where any information requested amounts to personal data, it will not be disclosable under STAIRs but may be disclosed as a Subject Access Request (DSAR) under data protection legislation. Where a request contains a mix of personal and non-personal data, we will ensure each element is handled appropriately. ForHousing's Data Protection Officer (DPO) or information governance lead will be consulted on any complex or borderline cases.

Review and Complaints Process

If a tenant is dissatisfied with how ForHousing has published information, or with the handling of or response to an information request, they may request an internal review. A review request should generally be made within three months of receipt of the original decision. A review request under STAIRs is separate from, and should not be handled under, our standard complaints procedure.

ForHousing will complete an internal review within 30 calendar days of receipt and the review will be conducted by a person other than the officer who provided the original response. Following a review, ForHousing may uphold its original position, publish or provide previously withheld information, or acknowledge failings and take remedial action. Full reasons for the review decision will be provided.

If the tenant remains dissatisfied following our internal review, they may escalate their complaint to the Housing Ombudsman Service. Tenants will be informed of this right in all responses and review outcomes. All STAIRs complaints to the Ombudsman must follow an internal review first.

Responsibilities

Overall responsibility for this policy lies with the Executive Director responsible for data and information governance. Day-to-day implementation is managed by the designated STAIRs lead, who will be a suitably qualified and experienced information governance professional. A STAIRs champion should be appointed in each business unit to identify relevant information and supply it to the STAIRs team on a timely basis. All colleagues are required to familiarise themselves with the requirements of this policy.

Equity, Diversity, and Inclusion

This policy promotes equality by ensuring all tenants have equal access to information about how their social housing is managed. STAIRs requires ForHousing to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs. No adverse impact was identified for protected groups through the Equality Impact Assessment process; the right to access information benefits all tenants equally, including those who may be most vulnerable or least able to advocate for themselves.

We value diversity and work to create an inclusive environment for our customers and colleagues, where everyone has access to the same opportunities. We welcome our

responsibility to comply with equalities legislation and regulatory requirements that relate to equity, diversity and inclusion and aim to do more. Through our activities we aim to remove systemic barriers to equal opportunities and eliminate all forms of discrimination, harassment, and victimisation within our organisation.

We are committed to providing excellent customer services, which are fair, equitable and inclusive. As such, we will endeavour to understand and make any reasonable adjustments required for customers in line with ForHousing's Reasonable Adjustment Statement and the Equality Act 2010. Any reasonable adjustment provided will be recorded and kept under active review.

Implementation and Communication

This policy will be implemented in two phases aligned with the STAIRs timetable. From October 2026, ForHousing will publish its Publication Scheme on its website, with information organised under the seven STAIRs classes. From April 2027, ForHousing will be ready to receive and respond to formal information requests from tenants. A dedicated disclosure log will be maintained to track all requests and timelines.

Tenants will be informed about the STAIRs Publication Scheme and how to make information requests through our website, newsletters, and tenant liaison channels. Tenant representatives and panels have been consulted as part of the design and ongoing development of the publication scheme. A plain English version of this policy will be made available for tenants.

Training will be provided to all relevant colleagues including customer-facing officers, request handlers, and business unit STAIRs leads, covering: how to identify STAIRs requests, the difference between personal data (DSAR) and STAIRs requests, applying the reasonableness test, and timescale obligations. This policy is available on the ForHousing website.

Monitoring, Recording, Reporting

The effectiveness of this policy will be monitored by the STAIRs lead on an annual basis, with an annual review report provided to the Executive Management Team (EMT) and to the Board via the Audit & Risk Committee. Monitoring will include: the number and nature of information requests received; response times; the number of internal reviews and their outcomes; any complaints escalated to the Housing Ombudsman and their outcomes; and the volume and currency of information published under the Publication Scheme. The disclosure log will serve as the primary record. This policy and the STAIRs scheme will be reviewed annually to ensure accuracy and compliance with any updated regulatory guidance. Audit of the scheme will be carried out on an annual basis by the information governance function.

Related Documents

- Data Protection Policy
- Complaints Policy
- Transparency, Influence and Accountability (TI&A) Consumer Standard (RSH)
- Information Asset Register
- Data Retention Policy

- STAIRs – Social Tenant Access to Information Requirements Operational Guidance (National Housing Federation / Anthony Collins, 2026)

Co-production

This policy has been developed with reference to the STAIRs working group convened by the National Housing Federation and with input from members of the TI&A Consumer Standard advisory group. Tenants and resident representatives will be consulted as part of the design of the Publication Scheme prior to its launch in October 2026. Ongoing tenant input will be sought through tenant panels, meetings, and liaison officers.

Approval & Review History

With effect from 01/06/2026 the approval route for the STAIRs Policy is:
SLT – EMT – ARC (noting)

Date	Version	Approved by	Detail
03/07/26	1	EMT	SLT (03/07/26) / ARC (16/09/26)