

Transparency & STAIRs Policy

1. Purpose and Scope

We're committed to being open, transparent, and accountable in the way we provide services, make decisions, and manage homes and communities.

We want customers to have easy access to information about how we deliver services, spend money, make decisions, and perform as a landlord. This helps customers understand what we do and hold us to account.

This policy explains:

- The information we publish proactively
- How customers can request information from us
- How we'll respond to requests
- When we may withhold or redact information
- How customers can ask us to review a decision

This policy supports our commitment to transparency and our obligations under the Social Tenant Access to Information Requirements (STAIRs).

This policy applies to:

- All employees
- Contractors and third parties delivering housing management services on our behalf
- Current social housing tenants
- Licence holders
- Shared owners who own less than 100% of their home's equity
- Authorised representatives acting on behalf of eligible customers

The policy covers information relating to the management of our social housing services.

The policy does not apply to:

- Former tenants
- Prospective tenants
- Members of the public
- Journalists
- Requests unrelated to our management of social housing

2. Our Approach

We're committed to being as open as possible about how we operate.

We'll publish information proactively wherever reasonable and we'll normally provide information when requested unless there is a good reason not to.

When considering requests for information, we'll start from a position of openness and transparency. The presumption will be in favour of disclosure unless it is reasonable to withhold information or apply redactions.

3. Information we publish

We publish information about:

Our services and plans

- Corporate Plan
- Service standards
- Development and regeneration activity

- Customer engagement activity
- Key housing management policies

How we're performing

- Annual reports
- Tenant Satisfaction Measures
- Complaints performance
- Service performance information
- Housing Ombudsman outcomes where appropriate

Financial information

- Annual financial statements
- Financial performance information
- Spending and investment information relating to housing services

Governance information

- Board and committee information
- Governance arrangements
- Declarations of interest
- Regulatory judgements and assessments

Information required under STAIRs

We'll maintain a Publication Scheme that sets out the categories of information we routinely publish in line with STAIRs. The detailed Publication Scheme can be found on the transparency & STAIRs page of our website.

4. Publication Scheme

Our Publication Scheme provides information relating to:

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

We'll regularly review published information to make sure it remains accurate, relevant, and up to date.

Information will normally be available through our website and can be provided in alternative formats where required.

Information published under our Publication Scheme will normally be available free of charge. We'll take reasonable steps to make information accessible and can provide information in alternative formats, including large print, accessible electronic formats or other reasonable adjustments where required.

5. Requesting Information

From 01 April 2027, eligible customers and their authorised representatives can request information relating to our management of social housing.

Requests must:

- Be made in writing
- Clearly describe the information requested
- Provide enough information for us to identify the customer and respond appropriately

Customers do not need to refer to STAIRs for a request to be treated as a STAIRs request.

We'll take reasonable steps to support customers who need help making a request or understanding information we've provided.

Where a customer is unable to make a written request independently, we'll provide reasonable support to help them do so.

Information can be made available in alternative formats where reasonable to do so.

Customers may authorise another person to act on their behalf.

Where a representative is not already known to us, we may ask for evidence that they have authority to act for the customer before responding to the request.

Where relevant information is held by a third-party delivering housing management services on our behalf, we'll use all reasonable endeavours to obtain that information in order to respond to the request.

6. Acknowledging and Responding to Requests

We'll acknowledge requests promptly and aim to do so within three working days.

We'll normally provide a response within 30 calendar days of receiving the request.

Where clarification is required, the timescale will begin once clarification has been received.

In exceptional circumstances we may extend the response timeframe. If this happens, we'll explain:

- Why an extension is needed
- When the customer can expect a response

Where information can be provided quickly through normal service delivery processes, we'll usually respond through our standard business processes rather than the formal STAIRs route.

Customers can still ask for a formal STAIRs response if they aren't satisfied with the information provided.

We'll maintain a record of information requests, responses, review outcomes and key decisions to support accountability, reporting and continuous improvement.

7. Information We May Not Provide

We're not required to create new information in order to respond to a request

We may refuse a request where:

- We cannot verify the customer's identity
- We do not hold the information
- The information falls outside the scope of STAIRs
- The request is repeated
- The request is offensive, abusive, or intended to cause unreasonable disruption
- Responding would exceed 18 hours of staff time
- It is otherwise reasonable to refuse under STAIRs

8. Withholding and Redacting Information

When deciding whether information should be withheld or redacted, we'll apply the STAIRs reasonableness test.

We'll consider:

- Protections under data protection legislation
- Confidentiality obligations

- Commercial sensitivity
- Legal privilege
- Health and safety risks
- Safeguarding concerns
- Regulatory or legal investigations
- Any harm that may arise from disclosure

We'll balance factors supporting disclosure against the likelihood and severity of any harm that could arise from disclosure.

When assessing harm, we'll consider

- The type of harm that may arise
- The severity of that harm
- How likely the harm is to occur
- Any impact on third parties, including customers, employees, contractors, and partner organisations

When making these decisions we will not take account of:

- Who has asked for the information
- Why they have requested it
- How they may use it
- Any potential reputational impact on us

Where information is withheld or redacted, we'll explain our reasons wherever appropriate and lawful to do so

In limited circumstances we may neither confirm nor deny whether information is held where confirming its existence would itself be likely to cause harm, breach legal obligations or undermine the purpose of withholding the information

9. Data Protection

Personal data will be handled in line with UK GDPR and the Data Protection Act 2018.

If a customer requests their own personal information, we may handle the request under our Subject Access Request process rather than STAIRs.

We'll ensure personal data relating to other individuals is protected and not disclosed unlawfully.

10. Reviews and Complaints

Customers can ask for a review if they believe:

- Information is missing from the Publication Scheme
- Information has been wrongly withheld or redacted
- We have not handled their request appropriately
- We have not responded within the required timescales

A STAIRs review is separate from our complaints process and will be handled under this policy rather than through our standard complaints procedure.

Review requests should normally be submitted within three months of the original decision.

Reviews will be completed by somebody who was not involved in the original decision wherever possible.

We'll normally respond to review requests within 30 calendar days.

If a customer remains dissatisfied following a review, they may refer the matter to the Housing Ombudsman. Information on how to contact the Housing Ombudsman will be provided as part of our review response and is available on the Housing Ombudsman website.

Where a review upholds a complaint, we will take appropriate action to provide the information, amend the Publication Scheme or improve our processes as necessary.

11. Responsibilities

All employees

All employees are responsible for:

- Recognising potential STAIRs requests
- Forwarding requests promptly to the Governance Team
- Supporting compliance with this policy
- Completing any training required

Governance Team

The Governance Team is responsible for:

- Maintaining the Publication Scheme
- Coordinating information requests
- Maintaining a disclosure log
- Managing reviews
- Monitoring compliance with STAIRs

Data Protection Officer

The Data Protection Officer is responsible for:

- Advising on information rights and data protection matters
- Supporting disclosure decisions
- Providing assurance on legal compliance

Executive Team

The Executive Team is responsible for approving this policy and ensuring appropriate oversight of compliance.

12. Monitoring and Review

We'll monitor compliance with this policy through:

- request and review reporting
- disclosure logs
- customer feedback
- Ombudsman decisions
- internal assurance activity

This policy will be reviewed at least annually, or sooner if legislation, regulation or best practice changes.

Author	Owner	Approval level e.g. Board	Date approved	Review date
Data Protection Officer	Data Protection Officer	Directors Group	September 2026	September 2027