Social Tenant Access to Information (STAIRs) Policy

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Policy developed by:	Euan Barr, Chief Executive

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Policy Aim

This policy aims to ensure that tenants are able to access information from their landlord. The policy sets out how Hornsey Housing Trust 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.

1. Purpose

This policy sets out how Hornsey Housing Trust 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.

2. Scope

This policy applies to all employees of Hornsey Housing Trust as the Private Registered Provider. STAIRs cover the publication of information, responding to information requests, and reviews and complaints.

3. Regulatory Framework

This policy is based on the Social Tenant Access to Information Requirements ("STAIRs") introduced under the amended Transparency, Influence and Accountability ("TI&A") Consumer Standard issued by the Regulator of Social Housing ("RSH"). The Ministry for Housing Communities and Local Government ("MHCLG") has issued a Direction to RSH requiring it to introduce a new Consumer Standard enabling tenants to access information held by Private Registered Providers ("PRPs").

Further to a consultation, RSH has issued an amended TI&A 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.

4. Policy 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. Annex 1 sets out the information which HHT will publish by class.

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. 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.

5. 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, tenants may contact our Business Support team to discuss their requirements.

Hornsey Housing Trust is committed to ensuring that information is made available in a way that is accessible as possible for all our tenants.

a) Publication Scheme (Chapter 1)

A template for a 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.

Hornsey Housing Trust will maintain a log of all information requests and timelines for responding to requests for reporting and accountability purposes.

6. Out of scope / Withheld information

Hornsey Housing Trust will publish relevant information that we already hold, but will not create new information solely for the purposes of the Publication Scheme set out in Annex 1.
. When considering whether the information should be published,
Hornsey Housing Trust will consider if the information comes within the classes of information set out in Table 1 of the Government Policy Statement. It may be necessary to redact documents prior to publication.

When considering an information request under Chapter 2 Hornsey Housing Trust 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 of the Policy.

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 request, a tenant considers that information has been

redacted or withheld without a reasonable basis for doing so, we will refer to our review process set out in section 7.

7. Review and Complaints Process

If a tenant considers that Hornsey Housing Trust has not published information or responded to a request for information appropriately or is otherwise dissatisfied with the handling of a request they may contact admin@hornseyht.co.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 we 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 they believe 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.

We will carry out a review of how we have handled the request (an "internal review") and aim to respond to the complaint within 30 calendar days of receipt. This will be undertaken by a different member of staff than dealt with the original request.
It may be necessary in exceptional circumstances to extend the timeline for a response – if this is necessary we will let the complainant know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

The review response letter will set out full reasons for the decision made in the review, so it is clear as to why the decision in question has been taken and inform tenants of their right to access the Housing Ombudsman service.

Any complaint to the Housing Ombudsman should generally be made within 3 months of the outcome of the review. The Ombudsman will only handle a complaint about STAIRs following a tenant having first sought an internal review of their complaint from Hornsey Housing Trust.

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

8. Data Protection and Security

. Where requested information includes personal data, we will consider whether it can be disclosed in accordance with data protection law. Where a tenant is requesting access to their own personal data, we will normally treat this as a subject access request and process it in accordance with data protection legislation

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 request for personal data we will process the request in line with our subject access requests policy available at www.hornseyht.co.uk.

For further information as to how we handle personal data, please see our privacy policy at www.hornseyht.co.uk.

9. Responsibilities

Overall responsibility for this policy lies with the Director of Finance & IT; day to day implementation of this policy lies with the Business Support Manager. All staff are required to familiarise themselves with the wording and obligations listed under this policy.

10. Monitoring and Review

This policy and the STAIRs scheme will be reviewed every three years to ensure accuracy and compliance. Audits of the scheme will be carried out on an annual basis.

ANNEX 1

This Annex sets out how Hornsey Housing Trust will proactively publish information about the management of its social housing. We are committed to being open and transparent about how we work, the services we provide and the decisions we make. We will publish information that we hold which falls within the classes of information set out below. These classes reflect the Social Tenant Access to Information Requirements (STAIRs) and cover areas including our governance and decision making, spending, housing stock management, performance, housing services, lists and registers, and the management of our social housing. For each class, the table below sets out the types of information we will routinely publish and how tenants can access it. The examples are not exhaustive and we may publish additional information where appropriate. Information will be kept up to date and reviewed regularly. Where possible, we will make current information and information covering the previous two financial years available, unless there is a good reason for a different period. We will not create new records solely for the purposes of the Publication Scheme. In some circumstances, information may be withheld or redacted where it is reasonable to do so, in accordance with this policy and the STAIRs requirements. We will make tenants aware of the Publication Scheme and ensure that published information can be easily identified and accessed.

Class of Information	**HHT Information Included**
Governance and decision making	About us Board & Committee Structure Our team Our Structure Our Policies Corporate Plan Tenant Engagement and Involvement Policy
Spending	Annual Financial Statements Tenant Annual Report Service Charge Information
Housing stock management	Building Safety Information Fire Safety Repairs Damp & Mould Compliance Anti-social behaviour Decent Homes Energy efficiency rating
Performance	Tenant Satisfaction Measures (TSMs) Financial statements Latest news Complaints Policies
Housing services	Description of services, advice, and guidance for tenants.
Lists and registers	Information held in registers required by law and other lists and registers relating to the management of social housing.
Social housing management	The Policies section on our website contains our decision-making policies as well as our policies relating to the management of social housing.

How will relevant information under STAIRs be published?

Information will be available on our website at www.hornseyht.co.uk 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.

Charges may apply for additional copies in the following circumstances:

1. Printed or Hard Copy Documents

- Black and white printing/ photocopying
- Colour printing/photocopying
- Binding or large volume printing
- Postage and packaging

2. Alternative Formats

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

3. No Charge for Inspection

Information may be inspected at our offices by appointment free of charge.

Tenant Feedback on this Publication Scheme

Tenants can provide suggestions for improvements to this Scheme via:

Email to admin@hornseyht.co.uk

Tenant Engagement Group meetings or via the Business Support Manager

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 may request a review at admin@hornseyht.co.uk. We will normally complete a review within 30 days.

ANNEX 2

Responding to Information

Who can make requests?

Hornsey Housing Trust 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). Hornsey Housing Trust 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, text message and social media, as long as we can identify who they are. 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 tenant.

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.

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. Hornsey Housing Trust 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 Hornsey Housing Trust 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 Hornsey Housing Trust 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.
- 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 tenant's identity (or that of their representative) cannot be established.
- The meaning of the request is not clear and they have 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 tenants acting in coordination or seeking the same information).

The request is offensive or communicated in an abusive manner
We may also redact information where it is appropriate and reasonable to do so.

Social Tenant Access to Information Requirements

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” a provider must ensure that it gives 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 a provider must consider or take account of a legal principle or legislation, but it does not mean that a provider has to follow that principle automatically. Providers should be able to justify why they consider that protected class under FOIA (or other relevant laws) may apply to the request and record their 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:

- 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, the registered provider 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.

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. Hornsey Housing Trust 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 the tenant know as soon as possible, together with our likely timeline to provide them 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.