

Doing it the right way: Social Tenant Access to Information Requirements

Policy Compliance Notes

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Relevant to	Colleagues, Board/Committee Members, Involved Customers, Volunteers and others directly involved in delivering Home Group's business activities
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Related Supporting Documents	Related policy compliance notes, procedures and other supporting documents can be found HERE
Distribution	Public facing Policy on our website All Home Group Colleagues, Volunteers & Agency Workers
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This document must be followed in order to fully comply with Home Group policies.

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Contents

1. [Introduction](#)
2. [Principles](#)
3. [STAIRs Publication Scheme](#)
4. [STAIRs Information Requests](#)
5. [Exemptions](#)
6. [Review and Complaints Process](#)
7. [Data Protection and Security](#)
8. [Version Control](#)

How to use this document

[BACK TO CONTENTS](#) You can return to the contents page at any time with this hyperlink.



[Click Here](#) icons will take you to more information.



The information in this document applies to colleagues working in England only. For Scottish Customers, please refer to G185af Freedom of Information Requests and G185ae Environmental Information Requests



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1. Introduction

- 1.1 This document provides further information about Home Group's approach to the Social Tenant Access to Information Requirements (STAIRs) and outlines our policy position.
- 1.2 STAIRs is a regulation that provides a direct right to information for our social housing customers in England. It does not apply in Scotland, where we are already subject to the Freedom of Information (Scotland) Act 2002 which provides an equivalent right to Home Group Scotland customers.
- 1.3 STAIRs has been implemented to ensure that Registered Providers of Social Housing are open with their customers, that customers can access the information they need about their housing, and that customers are empowered to hold their landlords to account for the quality of the housing and services they provide.
- 1.4 STAIRs is being implemented in two parts, which are referred to as "Chapters" within the STAIRs Regulation:
 - 1.4.1 **Chapter One:** the requirement to introduce a publication scheme, which takes effect from 1 October 2026; and
 - 1.4.2 **Chapter Two:** the requirement to facilitate and provide responses to information requests, which takes effect from 1 April 2027.

[**BACK TO CONTENTS**](#)

2. Principles

- 2.1 In light of the aims of STAIRs, the key principles enshrined by the regulation are transparency, openness, accountability and meaningful customer involvement in how our services are delivered.
- 2.2 STAIRs has specifically been implemented to address an accountability gap, where Registered Providers such as Home Group (who are not public authorities) are not ordinarily subject to Freedom of Information legislation. This meant that social housing tenants in England did not have a consistent way to request information from their landlords.
- 2.3 STAIRs does not replace or amend existing rights under other legislation, including the Right of Access (commonly referred to as a Subject Access Request) which provides the ability for individuals to obtain copies of their own personal data.
- 2.4 STAIRs does however draw many of its requirements from both the Freedom of Information Act and the UK General Data Protection Regulation (UK GDPR). This includes timescales, review mechanisms, disclosure principles and exemptions to disclosure.
- 2.5 STAIRs is not prescriptive in format, but instead places the responsibility on Home Group to determine what is appropriate to disclose based on our services, our

customers' needs, and the information that we hold. Much like Freedom of Information, the emphasis of STAIRs is on proactive disclosure and requires us to look to the spirit of the requirements rather than tell us exactly what to do.

[BACK TO CONTENTS](#)

3. STAIRs Publication Scheme

- 3.1 The STAIRs Publication Scheme ("publication scheme") will be available from 1 October 2026. The Publication Scheme refers to our publication of key classes of information, as contained with the STAIRs regulation. These classes of information are:
- 3.1.1 **Governance and decision making** – how we make decisions that impact our customers and how we run our organisation
 - 3.1.2 **Spending** – how we are funded and how we spend money
 - 3.1.3 **Housing stock management** – our plans for our homes, maintenance work, our progress towards net zero, and transfers of homes to or from Home Group
 - 3.1.4 **Performance** – how we are doing in key operational areas, including regulatory inspections, Tenant Satisfaction Measures, complaints, information requests, maintenance and tenancy management
 - 3.1.5 **Housing services** – a description of our services, and advice and guidance for our customers
 - 3.1.6 **Lists and registers** – key information and records that we keep to fulfil our legal obligations, such as gas safety
 - 3.1.7 **Social housing management** – policies and strategies relating to how we manage our social housing
- 3.2 Our publication scheme will be available free of charge to all of our customers. Primarily, this will be available on our website and signposted in our website footer so it is easy to locate.
- 3.3 We are committed to ensuring that information is as accessible as possible to our customers. Alternative non-electronic formats of our publication scheme are available on request. If this is required, please get in touch with our Data Protection team by email to DPO@homegroup.org.uk or via telephone to our Customer Service Centre.
- 3.4 We will keep our publication scheme under regular review to ensure it is relevant and meaningful for our customers. We welcome and encourage any feedback on our publication scheme, to ensure it is as informative as possible. If a customer feels that information we should publish is missing or incorrect, please refer to our STAIRs Review Process under Section 7.
- 3.5 STAIRs does not require us to create new data to meet the requirements of the publication scheme.

- 3.6 We may be required to “redact” (i.e. withhold) certain information before it is published. This will only be done where a valid exemption applies. See Section 6 for further information on exemptions.

[BACK TO CONTENTS](#)

4. STAIRs Information Requests

- 4.1 STAIRs Information Requests (“information requests”) can be made from **1 April 2027**.
- 4.2 Information requests can be made by any of our social housing customers, or via their appointed advocate or representative. A social housing customer includes our customers within an affordable rent, mid-market rent, or shared ownership property, and our supported services.
- 4.3 Members of the public cannot raise an information request under STAIRs.
- 4.4 Information may be requested for “relevant information”. This is any information that relates to the management of our social housing. This includes but is not limited to:
- the handling of property moves
 - rent collection
 - rent rates
 - service charges for shared owners
 - occupancy rights
 - estate management, management of communal areas and boundary issues
 - property conditions, repairs, and improvements to property
 - anti-social behaviour
 - staffing and training
 - complaints handling, procedures and performance
 - compensation and redress
 - communication and customer service
 - health and safety
 - data handling and privacy
 - security
 - housing stock transfers and mergers
 - housing stock profile
 - environmental and energy efficiency information
- 4.5 Information that is not “relevant information” includes matters determined by local councils such as allocation procedures, or information that does not relate to our social housing functions.
- 4.6 If there is a separate legal right to access information, we will not handle the information request under STAIRs but revert to the existing process. If this scenario applies, we will clearly explain this to the applicant.
- 4.7 This Policy will be updated with further information about information requests ahead of this right becoming available.

[**BACK TO CONTENTS**](#)**5. Exemptions**

- 5.1 There are certain reasons set out in law that mean we may be unable to provide information under STAIRs. This is referred to as an “exemption”.
- 5.2 Where an exemption applies, we may redact (i.e. withhold) information before it is published or shared. If we are unable to apply redaction, we may need to withhold the document.
- 5.3 Prior to applying an exemption, we will complete a balancing test which will review the likelihood of any harm arising from disclosure against the need to communicate transparently and in the spirit of the regulation. We will start from the presumption that information is disclosable. We will then review the likelihood of harm with reference to the following factors:
- **Type of harm** - physical, mental, financial or operational / commercial
 - **Severity** – how serious could the harm be?
 - **Likelihood** – is the harm likely to arise?
 - **Harm to third parties** – including other individuals, or third party organisations
- 5.4 The exemptions that apply to STAIRs are the same as those included within the Freedom of Information Act 2000 and the Data Protection Act 2018. These include, but are not limited to:
- **Information already accessible to the applicant** – where information is already available via an alternate process (including our publication scheme)
 - **Protection of the rights of others** – where information identifies or relates to other individuals
 - **Health and safety** – where information could endanger the physical or mental health of any individual, or their safety
 - **Legal professional privilege** – where information is being discussed in confidence with our legal advisers
 - **Management forecasts** – where information is being used for forecasting or planning purposes (and disclosure could impact these purposes)
 - **Negotiations** – where information contains our intentions towards a negotiation (and disclosure could impact that negotiation)
 - **Information intended for future publication** – where information has already been identified (prior to the request being raised) as publishable information at a future date
 - **National security** – where information could create or increase a national security risk, including cyber attacks
 - **Law enforcement** – where information could prejudice the prevention or detection of crime
 - **Information provided in confidence** – where information was received by Home Group in confidence, and disclosure would breach the duty of confidentiality to that person or company

- **Commercial interests** – where information is a trade secret, or could prejudice our commercial interests

[BACK TO CONTENTS](#)

6. Review and Complaints Process

- 6.1 STAIRs has a designated complaint mechanism which is separate from our existing complaints process. For clarity, we refer to this process as our “STAIRs Review Process”. We have set out how this will operate in respect of our publication scheme below.

Publication Scheme – STAIRs Review

- 6.2 If a customer or their designated representative believes that we have not published information that we hold, and that falls within scope of our publication scheme, they may raise a complaint under our STAIRs Review Process.
- 6.3 A request for a STAIRs Review can be logged by contacting our Data Protection Team by email to DPO@homegroup.org.uk, or via telephone to our Customer Service Centre.
- 6.4 We will acknowledge the STAIRs Review Request within 5 working days. We have 30 calendar days to provide our response. Prior to the deadline starting for our response, we may be required to verify the identity of the applicant to confirm that they are a customer, or an authorised representative of a customer. Where an authorised representative does raise a request, this verification may involve speaking to the customer to confirm their consent.
- 6.5 Within our response, we will investigate whether we agree that the information should be published (upholding the review request) or whether we disagree that the information should be published (not upheld).
- 6.6 Where we agree that the information should be published, where possible we will update our publication scheme within this timeframe. If this is not possible, we would seek to provide a copy of the information to the customer within our review response (ahead of making this available within our publication scheme).
- 6.7 Where we do not agree that the information should be published, we will clearly explain our justification within our response. This may be due to:
- The information not existing
 - The information not falling under a class of information set out within the STAIRs regulation
 - An exemption applying to the information
- 6.8 We will signpost the Housing Ombudsman scheme within our response, which the customer can escalate their request to if they are dissatisfied with our response. The matter must be escalated to the Housing Ombudsman within three months of our response being issued.

[BACK TO CONTENTS](#)

7. Data Protection and Security

- 7.1 Data protection requirements continue to apply to Home Group, and STAIRs does not replace existing data rights or permit disclosure of information that relates to other individuals.
- 7.2 If we receive a request under STAIRs for a customer's own personal data, we will process this under our Subject Access Request procedure. Where this is the case, we will clearly inform the customer and guide them through the process.
- 7.3 When preparing information for publication, or via a STAIRs information request, we must have due regard for the rights of others and ensure that any third party personal data is protected. This will be considered under our exemption process in Section 6 above.
- 7.4 We will ensure that any information shared under STAIRs is kept secure and utilise appropriate security measures when disclosing information.

8. Version Control

Version Number	Effective Date	Amendment made by (job title)	Version approved by (job title)	Description of Changes
1.0	Sept 2026	Data Protection Manager	General Counsel	New document

[**BACK TO CONTENTS**](#)