

Social Tenant access to information requirements (STAIRS) policy

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1. Aim

1.1 This policy aims to ensure that tenants can access information from us as their landlord. The policy sets out how we will promote tenants' access to information through a formal publication scheme, and how we will support tenants or their representatives to make information requests.

2. Purpose

2.1 This policy sets out how ISHA will comply with the government's Social Tenant Access to Information Requirements, or "STAIRs", ensuring transparency, openness and tenant empowerment in being able to hold their landlord to account.

3. Scope

3.1 This policy applies to all current ISHA tenants. It must be followed by all ISHA employees and by any third parties contracted by ISHA to deliver social housing management services or carry out responsibilities under this policy. STAIRs cover the publication of information, responding to information requests, and reviews and complaints.

4. Publication scheme

4.1 Under the Transparency, Influence and Accountability Standard set by the Regulator of Social Housing, from 1 October 2026 ISHA is required to proactively publish information which it holds and which falls within one or more of the classes of information set out in Appendix 1. Information published within each class is up to date and correct as at the date of publication.

4.2 Information will be published via a dedicated STAIRs page on ISHA's website. We are committed to making information available free of charge. If information is required in an accessible alternative format, a single copy will be provided free of charge. If printed copies are requested, charges for printing and postage will be provided at the time of the request.

5. Information requests

Under the Transparency, Influence and Accountability Standard set by the Regulator of Social Housing, from 1 April 2027, tenants (or their designated representative) may make a request for relevant information relating to the management of ISHA's social housing.

5.1 Who can make information requests

5.1.1 The scheme is open to tenants or their designated representatives. It is not open to either former or prospective tenants. Tenants include social rent tenants and shared owners owning less than 100% of their property. Family members or others living at the property who are not named tenants cannot make requests unless designated as the tenant's representative.

5.1.2 We will only accept information requests where we can confirm the identity of the requesting tenant or their representative. There are no restrictions on tenants as to whom they may choose as their representative.

5.2 How to make a request

5.2.1 Requests must be made in writing, including either by email or letter, as long as we can identify who you are. Your 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 you.

5.2.2 We recognise that some 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.

5.3 Responses to information requests

5.3.1 We will aim to acknowledge receipt of requests within two working days.

5.3.2 We will respond to information requests within 30 calendar days from receipt of the request, or where the request requires clarification, 30 days from receipt of the clarification.

5.3.3 If your information request is unclear, we will take reasonable steps to assist you to make a clear and valid request.

5.3.4 In exceptional circumstances it may be necessary to extend the timeline for a response, including time to consider whether withholding or redacting information is required. Where this is necessary, we will inform the tenant or their representative 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 a reason for the delay together with our best estimate as to when a response may be expected.

5.3.5 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, we will take all reasonable steps to obtain the information, while taking a proportionate approach and considering the resources we have available. We will keep logs of our contacts where it is necessary to reach out to third parties for the information.

5.3.6 We are committed to making information available free of charge. If information is required in an accessible alternative format, a single copy will be provided free of charge. If printed copies are requested, charges for printing and postage will be provided at the time of the request.

5.4 Out of scope/withheld information

5.4.1 We are not required to create new information to comply with either the publication scheme or information requests. We are also not obliged to disclose information under STAIRs where we already disclose that information to comply with other statutory provisions, for example annual returns to the FCA (Financial Conduct Authority).

5.4.2 When considering an information request, we will consider whether any information may need to be withheld or redacted. Any withholding or redaction of information must be reasonable. See Appendix 2 for information on how “reasonableness” is assessed.

5.4.3 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.

5.4.4 We will ensure that information is published in the spirit of openness and transparency. When considering an information request disclosure, will not take into account the identity of the tenant or any purpose for which the information may be used. We will also not take into account any reputational risk or negative public interest for us which may be either caused or inferred by reason of any disclosure.

5.4.5 If, on receipt of any response, tenants or their representatives consider that information has been redacted or withheld without a reasonable basis for doing so, they may request a review as per section 6 below.

5.5 Refusing to respond to information requests

5.5.1 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 tenant’s identity (or that of their representative) cannot be established.
- the meaning of the request is not clear and there is no response 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 or is clearly intended to otherwise cause disruption to our organisation.

6. Review and complaints process

6.1 If you consider that we have not published information in line with the requirements of the publication scheme, responded to your request for information appropriately or you are otherwise dissatisfied with the handling of your request please contact stairs@isha.co.uk to request a review.

6.2 A request for a review should generally be made within three months of receipt of the original decision.

6.3 The purpose of any review will be to assess:

- how we have responded to your request for information (for example, where we may not have provided information in an accessible format);
- where we have not published relevant information that we may hold and which you believe you may be entitled to;
- where we have not complied with timelines for responding to your request and there is no good reason for us to have applied an extension;
- where we have either withheld or redacted relevant information from disclosure and you disagree with our decision and reasons for this.

6.4 We will carry out a review of how we have handled your request and aim to respond to your complaint within 30 calendar days of receipt. It may be necessary in exceptional circumstances to extend the timeline for a response – if this is necessary, we will let you know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

6.5 If you are not happy with our response to your review request, you are able to escalate your complaint directly to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme. The Ombudsman's complaints scheme is available at www.housing-ombudsman.org.uk. Any complaint to the Ombudsman should be made within three months of the outcome of your review.

6.6 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. Please note that if your concern relates to an alleged breach of data protection legislation you should inform us that your issue concerns a data protection complaint, which would then be dealt with via our usual complaints process for data protection matters – see our website for further information on how to make a data protection complaint.

7. Diversity and inclusion

7.1 ISHA is committed to valuing and promoting equality and diversity. We recognise that we have a duty to eliminate unfair treatment and discrimination in the services we provide and to promote and value respect in everything we do. We expect our staff to share these values and treat all customers with fairness and respect. Our Equality, Diversity and Inclusion (EDI) Strategy is in place and addresses our approach to inclusion. We adapt our approach as required or requested to accommodate an individual's needs in line with the Equality Act 2010.

7.2 This policy promotes equality by giving all tenants equal access to social housing information.

7.3 A plain language version of the policy will be made available on ISHA's website. No adverse impact of this policy was identified for protected groups.

8. Learning and development

8.1 ISHA staff will be made aware of this policy upon joining ISHA as part of their induction and through the organisation's annual training on data protection.

9. Data protection considerations

9.1 Data protection laws are directly applicable to housing providers. This means that where any information requested amounts to personal data, or may not be identifiable personal data in isolation but could amount to identifiable personal data when combined with other information, this information may be withheld from disclosure in compliance with data protection laws. Any requested information which amounts to personally identifiable data will not be disclosable under STAIRs.

9.2 Where we consider that your request amounts to request for personal data we will process your request in line with our data protection policy. Our [data protection policy \(PDF\)](#), information on [how to make a Subject Access Request \(SAR\)](#) and information on [how we handle your personal data](#) is available on our website.

10. Statutory and regulatory framework

10.1 RSH Transparency, Influence and Accountability Standard.

11. Roles and responsibilities

11.1 Overall responsibility for this policy lies with ISHA's Governance team and the Assistant Director of Governance & Business Assurance. The Data Protection Officer is responsible for implementation of the policy which includes ensuring requests are handled lawfully, consistently and within timescales; maintaining records of requests, reviews and outcomes; responding to the Housing Ombudsman requests and investigations and providing advice and support to colleagues on STAIRs matters. The Communications team maintains the STAIRs section of the website and works with the Governance team to ensure information is accessible, clear and up to date. All ISHA staff are responsible for supporting tenants in accessing information and making requests.

12. Monitoring and review

12.1 The Data Protection Officer will report quarterly to the Leadership Team and annually to the Audit & Risk Committee of the Board on compliance. External assurance on compliance may be sought through the organisation's internal audit programme or other external advisors.

12.2 This policy and the STAIRs scheme will be reviewed one year after implementation and subsequently reviewed every three years, in line with ISHA's policy management framework or earlier if legislative changes require.

13. Associated documents

13.1 Data protection policy.

Reference	Version	Created	Author	Review	Leadership Team approved
STAIRS policy	1.0	August 2026	Assistant Director of Governance and Assurance	September 2027	September 2026

Appendix 1 – Publication Scheme – Classes of information

Class of information	Information typically included
Governance and decision making	Senior staff names and roles, organisational structure and governance arrangements. Decision making processes and policies, prioritisation of complaints, information on tenant consultations (including methodology), tenant meeting minutes and agendas.
Spending	Spending, grants, use of service charge revenue.
Housing stock management	Plans, maintenance work, progress towards net zero, stock transfers.
Performance	Inspections outcomes, ratings, performance reviews, evaluation reports, Tenant Satisfaction Measures, media releases, complaint metrics, information request data, health and safety performance and assessments, maintenance work, number of evictions.
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	Policies and strategies relating to the management of social housing.

Source: [Policy Statement on Social Tenant Access to Information Scheme Requirements. 30 September 2025](#)

Appendix 2 – Reasonableness assessment

When considering whether it is reasonable to withhold any information in response to your 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 the Freedom of Information Act (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).