

Social Tenant Access to Information Requirements (STAIRs) Policy

Title: Social Housing STAIRS Policy		Reference: Version 1	
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1 Purpose

This policy sets out how Nacro 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. The government's policy statement can be viewed here

<https://www.gov.uk/government/consultations/social-tenant-access-to-information-requirements-consultation/outcome/social-tenant-access-to-information-requirements-policy-statement>

2. Scope

This policy applies to all employees of Nacro, and third parties contracted to provide social housing management services by Nacro as the Private Registered Provider. STAIRs cover the publication of information, responding to information requests, and reviews and complaints.

The policy applies to a Tenant: This refers to a tenant, including a licensee, and any other person in a landlord-tenant relationship with a registered provider. The person must be aged 18 or over to use this scheme.

3. Responsibilities

Overall responsibility for this policy lies with the Executive director responsible for Consumer standards (Helen Dyson) day to day implementation of this policy lies with Head of Quality and Innovation. All staff are required to familiarise themselves with the wording and obligations listed under this policy.

4. 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”). 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 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.

5. Policy Principles

STAIRs takes 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 the publication scheme. 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. We have provided a publication scheme which can be found on our website. The classes of documents and information represent those suggested in the Government Policy paper. A link to our webpage on this subject is provided here

<https://www.nacro.org.uk/social-tenant-access-to-information-requirements/>

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 mean 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.

6. 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 appendix (A) and (B) below.

Information available under STAIRs is generally available free of charge. Where information is required in a non-electronic format, please contact our STAIRS@nacro.org.uk team to discuss your requirements. Nacro is committed to ensuring that information is made available in a way that is accessible as possible for all our social housing tenants.

Publication Scheme (Chapter 1)

this details:

- (i) what classes of information will be published
- (ii) how that information will be published is set out in Annex 1 to this policy.

Information Requests (Chapter 2)

Our process for handling information requests is set out at Annex 2 to this policy.

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

7. Out of scope / Withheld information

Nacro is not required to create new information to comply with either the publication scheme or information requests. When considering whether the information should be published, Nacro will consider if the information comes within the classes of information set out in Table 1 of the Policy Statement. It may be necessary to redact documents prior to publication.

When considering an information request under Chapter 2 Nacro will consider whether any information may need to be withheld or redacted in response to your request. Any withholding or redaction of information must be reasonable and in line with the principles set out in paragraphs 14 – 16 of the Policy Statement.

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 your request, you consider that information has been redacted or withheld without

a reasonable basis for doing so, we refer you to our review process set out in section 7.

8. Review and Complaints Process

If you consider that Nacro has not published information or responded to your request for information appropriately or you are otherwise dissatisfied with the handling of your request, please contact STAIRS@nacro.org.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 your 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 you believe you may be entitled to;
- iii. 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;
- iv. where we have either withheld or redacted relevant information from disclosure and you disagree with our decision and reasons for this.

We will carry out a review of how we have handled your request (an “internal review”) and aim to respond to your request for a review 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

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 generally be made within 3 months of the outcome of your review.

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 data protection policy.

9. Data Protection and Security

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 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 your request amounts to request for personal data, we will process your request in line with our subject access requests policy..

For further information as to how we handle your personal data, please see our [webiste www.nacro.org.uk](http://www.nacro.org.uk)

10. Equality Impact Assessment Summary

This policy promotes equality by giving all tenants equal access to social housing information. No adverse impact was identified for protected groups.

11. Monitoring and Review

This policy and the STAIRs scheme will be reviewed annually to ensure accuracy and compliance.

Annex 1

Publication Scheme

Nacro website sets out the basis on which we will proactively publish information relating to the management of its social housing function. We are committed to being open and transparent about the way we work, the services we provide and the decisions we make.

The information covered by this scheme is included in the classes of information set out on our STAIRS webpage, where this information is held by us.

We publish information within each class which is up to date and correct as at the date of publication and for the previous two financial years, unless stated otherwise.

How will relevant information under STAIRs be published?

Information will be available on our website at <https://www.nacro.org.uk/social-tenant-access-to-information-requirements/>

and will be regularly updated.

Tenant Feedback on this Publication Scheme

Tenants can provide suggestions for improvements to this Scheme via:

- Email to CommunityVoice.Coordinator@nacro.org.uk

Reviews

Should you consider that we have not included information in our publication scheme on our STAIRS webpage, or that we have unduly redacted information which you consider ought not to be redacted, please request a review at STAIRS@nacro.org.uk. We will normally complete a review within 30 days.

Annex 2

Responding to Information Requests

Who can make requests?

Nacro will respond to Information requests that are made either by a registered tenant/licensee with us, or by their designated representative (the scheme is not open to either former or prospective tenants/licensees). Nacro will only respond to requests where it can confirm the identity of the requesting tenant/licensee and their representative (where appointed). There are no restrictions on tenants/licensee 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 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.

We recognise that certain tenants/licensees may require additional support to make a request, and we will ensure that appropriate arrangements are in place to support all tenants/licensees 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 your request within 5 working days of receipt. We will respond to your request within 30 calendar days from acknowledgment or where the request requires clarification, 30 Calendar days from receipt of the clarification. Nacro 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 Nacro will inform you 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 you with a reason for the delay together with our best estimate as to when you 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 Nacro 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).
- Your identity (or that of your representative) cannot be established.
- The meaning of the request is not clear, and you 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/licensees 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.

We may also redact information where it is appropriate and reasonable to do so.

What does “reasonable” mean when responding to requests?

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 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 consider 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 consider 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 (for example, we are legally required to provide to Companies House information about our corporate activities, such as the filing of our annual return)

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. Nacro 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 you know as soon as possible, together with our likely timeline to provide you 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 you.

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