



PEAKS & PLAINS
Housing Trust

The Trust

STAIRs Policy

(Social Tenant Access to
Information Requirements)

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1. INTRODUCTION

- 1.1 Peaks & Plains Housing Trust (the Trust) is committed to being open and transparent with its tenants and residents. The Trust recognises that the people who live in their homes have a right to information about how those homes, and the services associated with them, are managed.
- 1.2 STAIRs — the Social Tenants Access to Information Requirements — is a statutory framework introduced under the Social Housing (Regulation) Act 2023, directed by the Ministry of Housing, Communities and Local Government (MHCLG). It gives tenants of private registered providers (PRPs) rights to access relevant information about the management of their social housing.

2. SCOPE

STAIRs is the government's initiative for a more transparent and approachable relationship between Resident and Housing Association. It stands for Social Tenants Access to Information Requests. It is being introduced in two stages:

- 2.1 From 1 October 2026
 - the Trust must proactively publish certain prescribed classes of information through a maintained Publication Scheme.
- 2.2 From 1 April 2027
 - the Trust must respond to written requests from tenants for relevant information within 30 calendar days.
- 2.3 This policy sets out the Trust's approach to meeting both obligations, and the responsibilities of staff, managers and senior leaders in ensuring compliance.
- 2.4 STAIRs does not replace or override the Trust's obligations under UK GDPR, the Data Protection Act 2018, or any other legislation. Where a request relates to a tenant's own personal data, it will be handled as a Data Subject Access Request (DSAR) under the Trust's Data Protection Policy, and the tenant will be informed accordingly.

3. LEGAL & REGULATORY REQUIREMENTS

- 3.1 This Policy supports compliance with the Government's Social Tenant Access to Information Requirements (STAIRs). STAIRs require private registered providers of social housing in England to proactively publish specified information about the management of their homes and to respond to written requests from tenants for relevant information that is not already published. Publication Scheme requirements apply from 1 October 2026, with Information Request requirements applying from 1 April 2027.
- 3.2 The Policy also supports compliance with the regulatory standards issued by the Regulator of Social Housing (the Regulator). The Secretary of State has directed the Regulator to introduce a regulatory standard requiring private registered providers to comply with the STAIRs requirements. This Policy sets out how the Trust will meet those obligations by establishing

arrangements for the publication of information, the handling of Information Requests, and the appropriate withholding of information where permitted by law.

3.3

3.3.1 Housing and Regeneration Act 2008

- Establishes the regulatory framework for Registered Providers of Social Housing and provides the Secretary of State's power to direct the Regulator of Social Housing (including the introduction of STAIRs requirements under section 197).

3.3.2 Social Housing (Regulation) Act 2023

- Strengthens consumer regulation, transparency and accountability within the social housing sector and underpins reforms such as STAIRs.

3.3.3 UK General Data Protection Regulation (UK GDPR)

- Governs the processing of personal data and applies where information requested under STAIRs contains personal information.

3.3.4 Data Protection Act 2018

- Supplements the UK GDPR and provides the UK's domestic data protection framework, including exemptions relevant to disclosure decisions.

3.3.5 STAIRs – Policy Statement (MHCLG)

- Sets out the mandatory Publication Scheme and Information Request requirements that Registered Providers must comply with from October 2026 and April 2027 respectively.

3.3.6 Direction on STAIRs 2025

- The Secretary of State's formal direction requiring the Regulator of Social Housing to introduce a regulatory standard requiring compliance with STAIRs.

3.3.7 Regulator of Social Housing – Regulatory Standards

- The regulatory framework within which Registered Providers must operate. The STAIRs Direction requires the Regulator to introduce a standard requiring compliance with the STAIRs Policy Statement.

4. DEFINITIONS

4.1 Relevant Information

- Information held by the Trust relating to the management of its social housing, including policies, plans, procedures, performance data and actions taken in connection with those activities.

4.2 Publication Scheme

- The Trust's maintained register of information classes proactively published in compliance with STAIRs from 1 October 2026.

- 4.3 Information Requests
- A written request from a current tenant (or their designated representative) for relevant information not already published under the Publication Scheme Operative from 1 April 2027.
- 4.4 Tenant
- Any current tenant of the Trust's social housing, including licensees and shared owners holding less than 100% equity..
- 4.5 Designated Representative
- A person expressly authorised by the tenant, in writing, to act on their behalf in relation to a STAIRs Information Request. The landlord may require evidence of that authority together with identity verification for both the tenant and representative before accepting the request as valid. Examples include:
 - a solicitor;
 - a regulated legal adviser;
 - a recognised advocacy service;
 - a support worker;
 - a family member;
 - a friend or
 - any other person expressly authorised by the tenant.
 - The landlord may refuse to correspond with a purported representative where reasonable doubt exists regarding their authority, identity or purpose.
- 4.6 Data Privacy Manager
- The designated member of staff responsible for day-to-day co-ordination of STAIRs compliance — managing the Publication Scheme, receiving and co-ordinating responses to information requests, and compliance reporting.
- 4.7 Exemptions
- A permissible ground on which the Trust may withhold or redact information that would otherwise be disclosable under STAIRs.
- 4.8 Redactions
- The removal or obscuring of exempt information within a document before disclosure, where an exemption applies to part but not all the document.
- 4.9 Internal Review
- The Trust's STAIRs-specific review process, through which a tenant may challenge a refusal, partial disclosure, or failure to respond within the required timescale.
- 4.10 Housing Ombudsman Service (HOS)
- The independent statutory body to which tenants may escalate an unresolved STAIRs complaint following the Trust's Internal Review. Jurisdiction is conferred under proposed amendments to the Housing Ombudsman Scheme.

- 4.11 Data Subject Access Request (DSAR)
- a separate right under UK GDPR, handled under the Trust's Data Protection Policy and not under this policy.
- 4.12 30-day Clock
- The 30-calendar day period within which the Trust must respond to a valid information request. The clock pauses if clarification is sought and resumes on receipt of the tenant's response.

5. OUR POLICY

5.1 Publication Scheme

- 5.1.1 From 1 October 2026, the Trust will maintain and publish a Publication Scheme setting out the classes of information it proactively makes available to tenants and the public. The Publication Scheme will be accessible via the Trust's website and in an accessible format on request, including in alternative formats and languages at no charge.
- 5.1.2 The Publication Scheme will be reviewed annually, after the first year, and then at three yearly intervals, or updated, whenever the information it references, changes materially. The Data Privacy Manager is responsible for maintaining the scheme and ensuring that published information remains current, accurate and accessible.
- 5.1.3 The Trust will make tenants aware of the Publication Scheme and their rights under STAIRs prior to 1 October 2026, including through the Trust's website, customer newsletter (Plainspeaking), and tenant engagement channels.
- 5.1.4 The Trust will maintain an internal Publication Scheme Register documenting, for each published item: the information class, what is published, where it is published, when it was last reviewed and when it is next due for update.

5.2 Publication Classes

The Trust's Publication Scheme covers the following seven classes of relevant information, as defined by the MHCLG STAIRs Policy Statement:

- 5.2.1 Governance and Decision-Making
- including the identities of senior officers, board members and committee structures, governance policies, decision-making procedures, and key strategic documents.
- 5.2.2 Finance and Spending
- including audited financial statements, a summary of how income is spent (by service area), grants received, procurement procedures, and contracts for housing management services exceeding £500.

- 5.2.3 Housing Stock Management
- including the Asset Management Strategy, planned maintenance programme, stock profile, property condition data, stock transfer information, and net zero/decarbonisation progress.
- 5.2.4 Performance
- including TSM (Tenant Satisfaction Measures) outcomes, complaint metrics, health and safety compliance performance, inspection results, Awaab's Law response time data, number of evictions, number of decants, and compensation and redress data. Performance information will be published quarterly or annually, in accordance with the Trust's internal reporting arrangements and statutory requirements.
- 5.2.5 Housing Services and Tenant Liaison
- including service standards, contact information for tenant-facing teams, and guidance documents for all housing services.
- 5.2.6 Lists and Registers
- including safety registers (gas, electrical, fire risk assessments, asbestos, water hygiene/legionella) at portfolio or building level, estate inspection schedules, building safety performance documents, damp and mould case tracking reports, and the home adaptations register.
- 5.2.7 Social Housing Management Policies
- all policies governing the management of the Trust's social housing, including tenancy, repairs, complaints, anti-social behaviour, safeguarding, building safety, service charges, decant, succession, water safety, and disrepair.
- 5.2.8 The Trust will work with tenants and the Challenge Group to understand tenant priorities when developing and reviewing the Publication Scheme. The Publication Scheme is not an exhaustive list; the Trust will proactively and widely consider what relevant information it holds and, where appropriate, include additional material beyond the minimum required.

5.3 Information Requests

- 5.3.1 From 1 April 2027, any current tenant of the Trust — or a designated representative acting on their behalf with the tenant's written authority — may make a written request for relevant information not already published under the Publication Scheme.
- 5.3.2 A valid information request must:
- be in writing — including by letter, email, text message, social media message, or via the Trust's website, provided the tenant can be identified;
 - be made by a current tenant or their designated representative;
 - identify or describe the information sought in sufficient detail; and
 - relate to the management of the Trust's social housing.

- 5.3.3 A request does not need to reference 'STAIRs' by name. Any written communication from a current tenant seeking relevant information will be assessed and, if valid, handled under this policy. The Trust will also handle 'mixed' communications — where a single letter or email raises a complaint, a personal data request and a STAIRs request — by ensuring each element is identified and routed to the appropriate team.
- 5.3.4 The Trust will make reasonable efforts to assist tenants in making a clear and valid request and will provide appropriate support to tenants who may be unable to make a written request due to disability or vulnerability (for example, by transcribing a verbal request and confirming it in writing with the tenant).
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- 5.3.6 The Trust will acknowledge all valid requests in writing within three working days of receipt. The Trust will then respond within 30 calendar days of receipt of the request (or, where clarification is needed, within 30 calendar days of receipt of the tenant's clarification response). If the 30th calendar day falls on a weekend or Bank Holiday, the response will be issued on the last working day before.
- 5.3.7 The Trust may, in genuinely exceptional circumstances only; for example, requests involving an unusually high volume of records, information held across multiple departments or third parties, or the need to consult external bodies before disclosure; extend the 30-day response period. Where an extension is applied, the Trust will notify the tenant at the earliest opportunity, explain the reason for the extension, and confirm the expected date of response. Any extension will be kept to the minimum necessary and will not ordinarily exceed a further 30 calendar days.
- 5.3.8 The Trust will maintain a Request Log recording all requests received, their date of receipt, the nature of the request, the response provided, the date of response, any exemptions applied, and whether an Internal Review was requested. A version of the Request Log (with personal data removed) will be published periodically as part of the Performance class of the Publication Scheme.
- 5.3.9 Information will generally be provided free of charge, in an electronic format unless the tenant requests otherwise. The Trust will provide a single copy of any information in an accessible alternative format (including hard copy, large print, audio or alternative language) free of charge on request.
- 5.3.10 Where a request would take more than 18 hours of staff time to process, the Trust is entitled to decline the request. In such cases the Trust will inform the tenant of the reasons and will direct them to any relevant published information.

5.4 Exemptions and Refusals

5.4.1 The Trust may refuse a request, or withhold part of the information requested, where one or more of the following grounds applies:

- The disclosure would be prohibited by or incompatible with another legal obligation, including UK GDPR and the Data Protection Act 2018.
- The information relates to the Trust's commercial interests or those of a third party, and disclosure could or would be likely to prejudice those interests.
- The information is subject to legal professional privilege.
- Disclosure would or would be likely to prejudice the prevention or detection of crime, or an ongoing investigation by the Trust or a statutory body.
- The information relates to a third party, and disclosure would breach that person's right to privacy or data protection rights.
- The information falls outside the scope of STAIRs (for example, it relates to non-social housing activities, or to matters determined by a local authority).
- The request is repeated, offensive, communicated in an abusive manner.
- The request would take more than 18 hours to process.

5.4.2 When assessing whether it is reasonable to withhold information, the Trust will have due regard to the protections afforded to relevant classes of information under the Freedom of Information Act (FOIA) and data protection legislation and will balance factors favouring disclosure against the likelihood and nature of any harm arising from disclosure. The Trust will not consider the identity of the requesting tenant, the reasons for the request, or any perceived reputational risk to the Trust.

5.4.3 Where a request is refused in full or in part, the Trust will notify the tenant in writing within the 30-day response period. The notification will clearly state the exemption(s) applied, the reason(s) for the decision, and the tenant's right to request an Internal Review. All refusal decisions will be documented in the Request Log together with the reasoning.

5.4.4 In limited circumstances, where even confirming or denying whether information is held would itself reveal something exempt or harmful, the Trust may issue a 'Neither Confirm nor Deny' (NCND) response, with reasons.

5.5 Redaction

5.5.1 Where an exemption applies to part only of a document, the Trust will disclose the remainder of the document with the exempt information clearly redacted. Redactions will be visibly indicated within the disclosed document, by blacking out the text completely. Redaction exemptions will be disclosed in the document or in the email reply. The Trust will use professional software to apply permanent redactions before disclosure.

5.5.2 All redaction decisions will be recorded in the Trust's Redaction Log, including the document, the nature of the information redacted, the exemption applied, and the balancing exercise undertaken. The Trust will not redact information merely because its disclosure would be inconvenient or commercially sensitive unless a specific exemption applies. The presumption will always be in favour of disclosure unless it is reasonable to redact.

5.6 Internal Review

- 5.6.1 The STAIRs internal review process is separate from the Trust's standard complaints procedure under the Housing Ombudsman Complaints Handling Code. It is a review of a STAIRs-specific decision — not a general service complaint — and will be handled accordingly.
- 5.6.2 A tenant who is dissatisfied with the Trust's response to a STAIRs matter may request an Internal Review. Grounds for review include:
- the Trust has refused a request, or has withheld or redacted information, and the tenant disputes the decision;
 - the Trust has failed to respond within the 30-day period without good reason;
 - the tenant believes the Trust holds information that should be published under the Publication Scheme but has not been made available; or
 - the tenant is dissatisfied with how their request was handled.
- 5.6.3 An Internal Review request must be made in writing, normally within three months of the Trust's response (or of the expiry of the 30-day period if no response was received). The Trust will inform tenants of this right when issuing any STAIRs response.
- 5.6.4 The Internal Review will be conducted by a senior officer who was not involved in the original decision. The review will be completed within 30 calendar days of receipt of the review request, unless exceptional circumstances require a reasonable extension (of which the tenant will be notified promptly).
- 5.6.5 The outcome of the Internal Review will be communicated to the tenant in writing, with full reasons for the decision. The response will inform the tenant of their right to escalate to the Housing Ombudsman if they remain dissatisfied. All Internal Review outcomes will be recorded by the Data Privacy Manager.

5.7 Housing Ombudsman Escalation

- 5.7.1 If a tenant remains dissatisfied following the Trust's Internal Review, they may refer the matter to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme. The Trust will always inform tenants of this right in its Internal Review response and will provide the relevant contact details.
- 5.7.2 The Trust will co-operate fully and promptly with any investigation by the Housing Ombudsman and will comply with any orders or recommendations made. The Ombudsman's powers under the proposed STAIRs complaints scheme include requiring the Trust to publish or disclose information, apologise, pay compensation, and review its policies and procedures. Compensation scales will be derived from Housing Ombudsman guidance.
- 5.7.3 The Trust will not destroy, alter or conceal information following receipt of any STAIRs request, review or Ombudsman complaint. Any breach of this obligation may itself be reported to the Regulator of Social Housing.

5.8 Data Protection and STAIRs

- 5.8.1 STAIRs does not override the Trust's obligations under UK GDPR and the Data Protection Act 2018. These apply alongside STAIRs, and the Trust must comply with both regimes.
- 5.8.2 Where a request is better characterised as a DSAR — for example, a request for information about the tenant's own tenancy record, repairs history, or personal data — the Trust will advise the tenant accordingly and handle it under the Data Protection Policy. Where a communication contains both a DSAR and a STAIRs element, both will be handled in parallel by the relevant teams.
- 5.8.3 The Data Privacy Manager will liaise with the Data Protection Officer (DPO) on any request or publication decision that raises a data protection question. The DPO will be kept informed of decisions that engage a conflict between STAIRs and UK GDPR.

5.9 Proactive Disclosure

- 5.9.1 The Trust is committed to a culture of transparency that goes beyond minimum compliance. We will proactively publish information beyond the minimum required by STAIRs where it is in the interests of tenants and is consistent with our legal obligations.
- 5.9.2 Where a pattern of requests reveals an area of tenant interest not adequately addressed by the existing Publication Scheme, the Trust will consider adding or updating published information to reduce the need for individual requests. The Trust will also consider publishing responses to previous requests on its website in a viewable format or consolidating similar responses in an FAQ format.

6. EQUALITY, DIVERSITY & INCLUSION

- 6.1 Actions taken in relation to vulnerabilities, should always be appropriate to the individual. They should not discriminate because of disability, age, gender affirmation, gender, sexual orientation, race, religion, culture or lifestyle, marriage and civil partnership, pregnancy and maternity.
- 6.2 The Trust will ensure that we address barriers to support / adjustments for those with protected characteristics who may also identify as vulnerable. This will include ensuring that information is available to customers in a range of formats and languages, providing bespoke support dependent on the person's needs, for example, this could be an advocate or an interpreter.
- 6.3 While the Trust does not necessarily define all people with any of the above protected characteristics as 'vulnerable', for the purposes of this policy, the Trust will give due consideration to any protected characteristics in deciding any enforcement action under the terms of a tenancy or lease to avoid any inadvertent discrimination.

- 6.4 Ideally, the Resident, or their Designated Representative, will complete the online Information Request form. Where this is not possible, each department will have access to this form and will be trained on its completion, which they can do on behalf of the Resident for any reason, including EDI characteristics.
- 6.5 An Equality Impact Assessment has been completed for this policy and reviewed by the Trusts EDI forum.

7. RESPONSIBILITIES

The following sets out the principal responsibilities under this policy:

7.1 Senior Leadership

- To approve this policy;
- To ensure staff awareness and compliance;
- To champion a culture of transparency;
- To ensure appropriate resources are in place for STAIRs implementation;
- To escalate significant compliance issues to the Board.

7.2 Audit Committee

- To receive periodic compliance reports (as per DSAR/Data Breach frequency).

7.3 Data Privacy Manager

- The day-to-day management of the Publication Scheme and Request Log; co-ordinating responses to information requests; making and documenting exemption decisions; quarterly compliance reporting; maintaining the Redaction Log.
- To be the first point of contact for all STAIRs matters, including Publication Scheme queries, information requests, and Internal Review requests. Contact details for the Data Privacy Manager are published on the Trust's website as part of the Publication Scheme.

7.3.1 Data Protection Officer (DPO)

- To advise on requests and publication decisions with data protection implications;
- To be kept informed of any GDPR/STAIRs conflicts.

7.4 All Managers

- To ensure data and information assets in their area are accurately reflected in the Publication Scheme;
- To respond promptly and accurately to requests routed to them; designate a team STAIRs lead.

7.5 All Staff

- To make themselves aware of the content and to comply with this policy;
- To identify and route relevant information requests to the Data Privacy Manager without delay.

8. CONSULTATION

- 8.1 This policy and the equality impact assessment have been through a thorough consultation process, which has included the Trust's Challenge Group, EDI Forum, Managers, Senior Managers and the Executive Management Team prior to approval.

9. REVIEW, APPROVAL AND REPORTING

9.1 KPI's & Performance Review

- 9.2 The Trust will review the effectiveness and content of this policy after one year of the policy effective date and then every three years on the anniversary, or following:

- any changes to the STAIRs regulatory framework or MHCLG guidance;
- any material guidance or determination published by the Housing Ombudsman in relation to STAIRs casework;
- any finding of maladministration against the Trust in relation to a STAIRs matter; or
- any material changes to the Trust's operations or information landscape.

- 9.3 This policy will be submitted to the Executive team for approval and will be made publicly available on the Trust's website.

- 9.4 KPI performance will be measured against number of requests and time completed / failed to complete. It will be reported to Audit Committee along with DSAR & Data Breaches.

9.5 Review, Audit and Compliance Checking

- 9.5.1 The Data Privacy Manager will report quarterly to the relevant Senior Leadership Team member on the volume of requests received; response times; exemptions applied; Internal Reviews completed; Ombudsman escalations; and the currency and accuracy of the Publication Scheme. Regular reporting will also be submitted to the Audit Committee.

- 9.5.2 The Trust will undertake periodic compliance checks to test adherence to this policy, including the accuracy and currency of the Publication Scheme and the timeliness and quality of responses to requests. Records will be maintained of all compliance checks and any corrective actions taken.

- 9.5.3 Breaches of this policy — including deliberate delay, obstruction, or destruction of information — will be investigated and may result in disciplinary action.

- 9.5.4 Compliance is also required under the Regulator of Social Housing's Transparency, Influence and Accountability (TI&A) Consumer Standard, as amended, and the Governance and Financial Viability Standard.

- 9.5.5 The Housing Ombudsman has jurisdiction over STAIRs complaints under the proposed amended Housing Ombudsman Scheme (Part 2B). Findings of service failure, maladministration or severe maladministration may result in orders, recommendations, compensation requirements, and publication of adverse determinations. Failure to comply with Ombudsman orders may be referred to the Regulator of Social Housing.

10. IMPLEMENTATIONS

10.1 Training & Awareness

- 10.1.1 This policy will be included in the induction process for all new staff. All current employees will be made aware of the policy and their obligations under it.
- 10.1.2 Targeted training will be provided to all staff who are likely to receive, handle or contribute to STAIRs requests or publication decisions. This includes frontline customer-facing staff, housing officers, asset and compliance teams, and managers. Each team will have a designated STAIRs lead responsible for identifying in-scope information and routing it to the Data Privacy Manager in a timely manner. A script will be made available for telephony-based support staff.
- 10.1.3 Training will be refreshed at least biennially and following any material change to the STAIRs framework, relevant guidance from MHCLG or the Housing Ombudsman, or the outcome of any Ombudsman finding against the Trust.
- 10.1.4 The Trust will undertake awareness-raising activities with tenants prior to the introduction of each STAIRs phase, to ensure they understand their rights, how to access the Publication Scheme, and how to make a request.

11. ASSOCIATED DOCUMENTS

- Data Protection Policy
- Information Security Policy
- Complaints Policy
- Equality, Diversity & Inclusion Policy
- STAIRs Request Log
- STAIRs Tenant Guide
- STAIRs Tenant Guide (ETR)
- STAIRs Request Form

POLICY INFORMATION

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