

# Social Tenant Access to Information Requirements policy (STAIRs)

| Document control                                                                                                  |           |         |                                                                                                                                                                                      |                      |                        |                              |                       |
|-------------------------------------------------------------------------------------------------------------------|-----------|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|------------------------|------------------------------|-----------------------|
| Valid from                                                                                                        | Valid to  | Version | Status                                                                                                                                                                               | Author               | Owner                  | Approval                     | Description of change |
| June 2026                                                                                                         | June 2029 | 1       | Final                                                                                                                                                                                | Data Privacy Officer | Director of ICT & Data | Customer Exp group June 2026 | New Policy            |
|                                                                                                                   |           |         |                                                                                                                                                                                      |                      |                        |                              |                       |
| <b>Distribution</b>                                                                                               |           |         |                                                                                                                                                                                      |                      |                        |                              |                       |
| <b>Other relevant documents</b>                                                                                   |           |         | Other policies and strategies that relate to this one: Privacy Policy, Data Protection Policy, Data Breach Policy, Data Subject Access Request Policy, Reasonable Adjustment Policy. |                      |                        |                              |                       |
| <b>Comments</b>                                                                                                   |           |         |                                                                                                                                                                                      |                      |                        |                              |                       |
| <b>Please indicate that the following issues have been considered during the production/review of this policy</b> |           |         | New legislation, regulation and best practice has been considered                                                                                                                    |                      |                        |                              | x                     |
|                                                                                                                   |           |         | Equity, diversity and inclusion                                                                                                                                                      |                      |                        |                              | x                     |
|                                                                                                                   |           |         | Health, safety and welfare                                                                                                                                                           |                      |                        |                              |                       |
|                                                                                                                   |           |         | Data protection                                                                                                                                                                      |                      |                        |                              | x                     |
|                                                                                                                   |           |         | Risk management                                                                                                                                                                      |                      |                        |                              | x                     |
|                                                                                                                   |           |         | Sustainability                                                                                                                                                                       |                      |                        |                              |                       |
|                                                                                                                   |           |         | Value for money                                                                                                                                                                      |                      |                        |                              |                       |

## **1. Purpose**

We want to make sure that tenants and other customers of Futures can access information from their landlord. This policy sets out how we intend to promote access to information through a formal publication scheme, which will allow customers to proactively access information, and how we will support tenants to make information requests.

This policy sets out how we will meet the Social Tenant Access to Information Requirements (STAIRs), making sure we remain transparent open and our tenants and customers can hold us to account.

## **2. Scope**

This policy applies to all employees of Futures Housing Group and any third parties we work with to provide social housing management services as the Private Registered Provider. STAIRs covers how we publish information, respond 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. 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.

## 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, please contact our **Data Protection** team to discuss your requirements. **Futures Housing Group** 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

### b. Information requests (Chapter 2)

**Futures Housing Group** 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

**Futures Housing Group** 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, **Futures Housing Group** will consider if the information comes within the classes of information. It may be necessary to redact documents prior to publication.

When considering an information request under Chapter 2 **Futures Housing Group** 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 STAIRs principles.

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.

## 7. Review and complaints process

If you consider that **Futures Housing Group** 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 the Data Protection Team 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 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.

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 [\[website details to be entered once HO publishes STAIRs complaints scheme\]](#). 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 usual complaints process for data protection matters.

## **8. 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 Data Protection policy available at [Policies and compliance - Futures Housing Group](#)

For further information as to how we handle your personal data, please see our privacy policy at [fhg-privacy-notice-full-updated-20240827.pdf](#)

## **9. Responsibilities**

Overall responsibility for this policy lies with the Director of ICT and Data; day to day implementation of this policy lies with the Head of Data Protection & STAIRs. 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 regularly to ensure accuracy and compliance. Audits of the scheme will be carried out on a periodic basis.

## **11. Accessibility and communicating tenant rights**

We will make tenants aware of their STAIRs rights through our website, welcome packs, and other tenant communications, ahead of both the October 2026 and April 2027 deadlines.

This policy, our publication scheme, and information about how to make a request will be available in accessible formats on request, including large print, easy-read, audio, and translated versions.

Our STAIRs web pages will be clearly signposted, easy to navigate, and regularly reviewed for accuracy. Tenants who need help understanding their rights or navigating the Publication Scheme should contact the Data Protection Team using the details below.

Tenants who have questions about STAIRs or their rights should contact:

|           |                                                                                                     |
|-----------|-----------------------------------------------------------------------------------------------------|
| Email     | <a href="mailto:Stairs@futureshg.co.uk">Stairs@futureshg.co.uk</a>                                  |
| Post      | Data Protection Team, Futures House, Building 435, Argosy Road, Castle Donington, England, DE74 2SA |
| Telephone | 0300 4562531                                                                                        |

## **12. Staff training**

All staff who may receive or handle information requests will receive STAIRs training before April 2027. Training will cover what STAIRs requires, how to identify a valid request, how requests differ from SARs, redaction principles, and how to pass requests to the correct team promptly.

Training will be refreshed annually and updated when the regulatory framework changes. New staff in relevant roles will receive STAIRs training as part of their induction.

## **13. Equality, diversity and inclusion**

Futures Housing Group is committed to equality, diversity and inclusion. We will ensure our approach to STAIRs does not disadvantage tenants with protected characteristics, language barriers, or additional support needs, and that all tenants can access and exercise their rights under this policy