



EDEN HOUSING ASSOCIATION LIMITED

SOCIAL TENANT ACCESS TO INFORMATION REQUIREMENTS (STAIRs) POLICY

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This policy applies to Eden Housing Association and all its wholly owned subsidiaries, including Mitre Housing Association

1. POLICY STATEMENT

This policy aims to ensure that tenants can access information from Eden Housing Association (EHA) as their landlord. The policy sets out how we will promote access to information through a formal publication scheme enabling tenants and tenants' representatives to access information proactively, and to support tenants to make information requests.

2. REFERENCES

Internal

Data Protection Policy

External

RHS Consumer Standards

RHS Publication Scheme

NHF Social Tenant Access to Information Requirements (Operational guidance for Registered Providers)

Freedom of Information Act 2000

Data Protection Act 2018

3. POLICY CONTENT

3.1 Purpose

This policy sets out how EHA 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.

3.2 Scope

This policy applies to all employees of EHA as a Private Registered Provider. STAIRs cover the publication of information, responding to information requests, and reviews and complaints.

3.3 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 representatives 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

3.4 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 set out in Table 1 of 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.

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 means 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.

3.5 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

Customer Services Team to discuss your requirements. Eden Housing Association 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 is set out in Appendix 2 to this policy.

B) Information Requests (Chapter 2)

Our process for handling information requests is set out at Appendix 3 to this policy.

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

3.6 Out of scope / Withheld information

EHA 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, EHA 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.

We have also included in Appendix 2 some suggested categories of information which may be out of scope of STAIRs – please note this is not an exhaustive list.

When considering an information request under Chapter 2 EHA 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.

Appendix 3 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 3.7.

3.7 Review and Complaints Process.

If you consider that EHA 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 our Customer Service 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 on their website [Social Tenant Access to Information Requirements \(STAIRs\)](#). 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.

3.8 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 subject access requests policy.

For further information as to how we handle your personal data, please see our [Privacy Policy](#).

4. RESPONSIBILITIES

Overall responsibility for this policy lies with The Director of Finance and Corporate Services.

All staff are required to familiarise themselves with the wording and obligations listed under this policy.

5. EQUALITY IMPACT ASSESSMENT (EIA)

This policy promotes equality by giving all tenants equal access to social housing information. No adverse impact was identified for protected groups. The EIA form is located in Appendix 1.

6. TENANT ENGAGEMENT IMPACT ASSESSMENT (TEIA)

The requirement for tenant consultation regarding the content of this Policy is outlined in the TEIA (appendix 1).

7. MONITORING & REVIEW

This policy and the STAIRs scheme will be reviewed annually to ensure accuracy and compliance. Audits of the scheme will be carried out on an annual basis.

Equality Impact Assessment (2.7.25)

Question	Response
1. Summary of aims and objectives of the policy/practice/activity	To provide all tenants with equal access to social housing information.
2. What involvement, consultation, engagement has taken place for the policy/practice/activity (e.g relevant groups/stakeholders)	<i>Refer to Tenant Engagement Assessment</i>
3. Who is affected by the policy/practice/activity (consider Armed Forces/Veterans)	All tenants
4. What are the arrangements for monitoring and reviewing the impact of the policy/practice/activity	<i>Refer to Revision Cycle on Front Page of document</i>

Protected Group	Is there a potential for a positive or negative impact	Action to address the impact
Disability: includes physical, sensory, neurodiversity, learning disabilities, mental health conditions / communication methods / range of support needed to participate / hearing loops or interpreters / accessibility – venue, location, transport	None	Policy available in alternative formats upon request
Gender reassignment: (transgender) people should be able to disclose their gender identity without fear or prejudice	None	
Marriage or civil partnership: all couples or partners, regardless of gender, should be able to access services	None	
Pregnancy or maternity: consider flexible hours of service or project / is there access to private area for breastfeeding, milk storage etc. / returning to work considerations	None	
Race: includes ethnicity, nationality and GRT communities. Consider the size of the BME communities that your service or project affects / languages spoken and understood / culture such as hygiene, clothing physical activities, mixed gender activities	None	
Religion or belief: consider dates and times of events in relation to religious practices and festivals / the diversity within the communities that your service or project affects / prayer times, meal times, food cultural habit or belief, religious holidays such as Ramadan	None	
Sexual orientation: consider LGB+ people should feel safe to disclose their sexual orientation without fear of prejudice	None	

Sex (gender): consider the impact on different genders / childcare and dependents care / mixed or single gender groups or activities / timing of services	None	
Age: consider the way younger and older people access services differently / use of technology / childcare or dependents care / transport arrangements / venue location	None	
Rurality: consider if there is a disproportionate impact on tenants living in rural localities	None	

Question	Explanation	
Is it possible the proposed policy/practice/activity could discriminate or unfairly disadvantage people	No	
Decision	Tick the relevant box	Include any justification required
1. No barriers identified and no change required – proceed	✓	
2. Barriers identified towards one (or more) protected groups – adapt or change the policy/practice/activity to remove any barriers. This will better advance equality and/or foster good relations		
3. Barriers identified towards one (or more) protected groups – stop . There are adverse effects which cannot be prevented / mitigated		
4. Barriers identified towards one (or more) protected groups – no proportionate way to amend the policy/practice/activity so proceed with caution .		

Action (To be completed as required)

If the evaluation has resulted in Decision 4, complete a risk assessment and record on Operational Risk Register	Date Completed:
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Tenant Engagement Assessment – is engagement with tenants necessary?
(1.7.25)

Impact	Tick relevant box	Note any details / justification
No Impact on current tenants – you can proceed without engagement, explaining why.	✓	STAIRs is a statutory requirement; this policy reflects legislation and good practice and will improve accessibility of information available for tenants.
Direct or indirect impact on current tenants. Stop! Identify who will be affected i.e. all tenants or a specific group.		

Influence	Tick relevant box	Note any details / justification
No influence for tenants – i.e. wholly legislative – you can proceed without engagement, explaining why.	✓	As above
Possible influence on areas of policy/ practice/ activity impacting on tenants – stop. Arrange engagement with EIO		
Best place for influence is the practical delivery of the policy – through procedure. Please summarise approach for procedure review		

Summary of engagement (To be completed as required)

Tenant group impacted and engaged (i.e. all/ sheltered)	
Consultation method	
Summary of engagement	
Key themes/ implications	

If you would like some assistance to work through this engagement assessment, please contact Jenny Webb – EIO.

Health & Safety Policy Review Assessment

Question	Additional information	
Does this policy/practice/activity address any Health & Safety practices?	No	
What is the key legislation related to this policy?	STAIRs	
Is the policy a control of a corporate or operational risk register? (if yes name risk)	ORR - 141	
Tick groups/ departments who require knowledge of this policy		
	All staff	✓
	ICT	
	Finance	
	Housing Options	
	Housing	
	Customer Services	
	Property	
	HR	
	Governance	
	Assisted Living	
	Contractors	
	Tenants	
Risk to tenants	Tick the relevant box	Additional Information
1. Are there additional measures required to reduce risk level to tenants.		
2. Has that risk been assessed?		
3. No Health & Safety implications	✓	
4. Does it require tenant visibility?	✓	If yes – upload to website

All assessments completed by:	Author: Stella Eggleston Date: 15/06/2026
All assessments reviewed by:	Reviewer(s): Executive Team Date: 21/07/26
Will these assessments be published?	Completed assessments are appended to each policy. Any appropriate public related policies are uploaded to the EHA website

SUGGESTED CATEGORIES OF OUT OF SCOPE INFORMATION	EXAMPLES OF TYPES OF INFORMATION (NOT AN EXHAUSTIVE LIST)
Internal business or commercial activities	• Contracts or agreements unrelated to the provision of housing management services (eg payroll services). • HR policies unrelated to social housing management (e.g. disciplinary policy). • Finance policies governing day to day business operations unrelated to the provision of housing management services. • Investment strategies relating to non-social or private housing. • Information which relates to internal discussions and the development of internal policy and strategy before board approval (“pipeline” information).
Matters decided by local authorities	• Housing allocations. • Homelessness assessments. • Housing benefit or council tax-related decisions. • Planning applications and planning enforcement actions.
Non-social housing management function	• Service charges for non-social housing. • Commercial lease management. • Repairs or safety data for market rent homes. • Private rented sector portfolios managed for profit.
Property that is not social housing	• Leasehold properties. • Shared ownership schemes where shared owner has staircased to own 100% of property equity. • Shops; offices; community centres. • Moorings, storage units or other non-residential lets. • Any build-to- rent or for-profit schemes held separately from the PRP.
Wider activities unconnected with social housing	• Group level commercial ventures – e.g.: renewable energy subsidiaries; trading companies; joint ventures for private sale developments. • Care and support contracts delivered on behalf of local authorities (for care and support only). • Commercial investment or treasury activities.

Responding to Information Requests

Who can make requests?

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

We will accept requests that are made in writing, including either by email, text message or 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 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.

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 days from receipt of your request, or where the request requires clarification, 30 days from receipt of the clarification. EHA 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 EHA 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 EHA 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 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 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).

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. EHA 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.

Model Publication Scheme

This document sets out the basis on which Eden Housing Association 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 in the table below, where this information is held by us.

The table sets out a non-exhaustive list of classes of information we routinely publish, how to access them, and any applicable charges. Much of the information may already be freely available on our website.

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.

For transparency purposes, although not required by the Policy Statement, we have included a table with proposed categories of out of scope information at the end of the model publication scheme.

This Scheme will be reviewed at least on an annual basis.

How will relevant information under STAIRs be published?

Information will be available on our website at www.edenha.org.uk and will be regularly updated.

Formats other than online

We are committed to making information listed in our Publication Scheme available free of charge online. If information is required to be provided in an accessible alternative format, we also commit to providing a single copy of this information free of charge. However, where an individual requests additional copies of information, we may apply charges strictly to cover the actual costs incurred in providing additional copies.

Charges may apply for additional copies in the following circumstances:

1. Printed or Hard Copy Documents
 - Black and white printing/ photocopying: £0.20 per sheet.
 - Colour printing/photocopying: £0.30 per sheet.
 - Binding or large volume printing: charged at cost.
 - Postage and packaging: charged at Royal Mail rates.

2. Alternative Formats

If information is requested in an alternative accessible format (e.g., large print, Braille, audio format), we will provide the information free of charge.

3. No Charge for Inspection

Information may be inspected at our offices by appointment free of charge. Please contact us to arrange an appointment.

Tenant Feedback on this Publication Scheme

Tenants can provide suggestions for improvements to this Scheme via:

- My Account
- Email to myviews@edenha.org.uk
- Tenant panels / meetings

Reviews

Should you consider that we have not included information in our publication scheme, or that we have unduly redacted information which you consider ought not to be redacted, please request a review at enquiry@edenha.org.uk.

We will normally complete a review within 30 days.

Model publication scheme – Classes of Information

Class of Information	Information included
Governance and Decision Making. Information in this class is published as at the current date. Information relating to tenant consultations and meetings published for the current and previous two financial years	• About us • Structure • Our Board • Our Committees • Our Executive Team • Our Decision- Making Processes • Tenant Consultation Documents • Board Papers • Kely document relating to strategic decision making by the board
Finance and Spending Information in this class is published for the current and previous two financial years	• Financial Statements • Rent Collection and rates • Procurement
Housing Stock Management	• Corporate Plan and Objectives • Stock Profile and Transfers • Property Conditions and Improvements
Performance Information in this class is published for the current and previous two financial years	• Inspections • Performance reviews • TSM Reports • Media Releases • Complaints • Information requests
Housing Services & Tenant Liaison Information in this class is published as at the current date.	• Tenant Handbook

Lists & Registers Information in this class is published for the current and previous two financial years	• Information held in registers required by law
Social Housing Management	• Policies and Strategies relating to the management of social housing