

Social Tenants Access to Information Requirements (STAIRS) Policy

Originator:	Regulatory Compliance Team
PCHA Board Approval Date:	July 2026
Review date:	July 2029

1	Introduction
1.1.	Pine Court Housing Association (PCHA) is committed to the principles of openness and transparency in the way that it conducts its business activities. It aims to provide information about its housing management function in accessible ways so that its social housing tenants can hold it to account.
1.2	This Policy sets out the ways in which PCHA will meet the 'Social Tenants Access to Information Requirements' (or STAIRS for short), that was introduced under the Social Housing (Regulation) Act 2023.
1.3	The Social Housing (Regulation) Act 2023 introduced new powers for the government to direct the Regulator of Social Housing (RSH) to introduce standards relating to information and transparency (STAIRS) and the intention is for this to be incorporated into the existing 'Transparency, Influence and Accountability' Standard of the Regulatory Framework.
1.4	The intention of the legislation is to give tenants of Private Registered Providers (housing associations) such as PCHA, the same rights to information relating to housing management activities that is available to social tenants of local Authorities under the Freedom of Information' requirements.
1.5	Access and Communication
1.5.1	PCHA is committed to ensuring that its services are accessible to everyone. PCHA will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for PCHA or use its services.
1.5.2	Working with our customers we have established a Vulnerable Persons and Reasonable Adjustments Policy to ensure we make best use of every customer interaction to meet customers' needs in our service delivery and ensure this information is kept up to date.
1.6	Equality, Diversity and Human Rights

1.6.1	PCHA is committed to fairness and equality for all customers, colleagues, and stakeholders.
1.6.2	PCHA's approach to Equality, Diversity, and Inclusion (EDI) goes beyond legal or statutory obligations, however, PCHA will meet or exceed its legal requirements as outlined in the Equality Act 2010 and the Human Rights Act 1998. This policy also demonstrates how PCHA will meet the requirements of Public Sector Equality Duties, which it has chosen to adopt and implement as a matter of good practice rather than as a legal obligation.
1.6.3	PCHA is fully committed to eliminating unfair and unlawful discrimination. Hate crime, harassment and bullying will also not be tolerated and PCHA will take proactive steps to prevent such behaviours.
1.6.4	It is unlawful to discriminate directly or indirectly based on the following protected characteristics: • Disability • Sex • Gender identity, or gender reassignment status • Race, racial group, ethnic or national origin, or nationality • Religion or belief • Sexual orientation • Age • Marriage or civil partnership status • Pregnancy or maternity
1.6.5	PCHA are also committed to ensuring that individuals are not treated less favourably due to their social, economic, or cultural backgrounds, as well as specific medical conditions as defined in the Equality Act 2010.
1.7	This Policy should be read in conjunction with: • PCHA Data Protection Policy • PCHA Vulnerable Persons and Reasonable Adjustments Policy
2	Statement of Intent
2.1	In operating this Policy PCHA will ensure it meets all relevant legal and regulatory requirements.
2.2	To ensure transparency, PCHA will proactively publish on its website information that relates to social housing management and will routinely make available broad classes of information e.g. customer satisfaction, as set out in Chapter One of the government's Policy Statement relating to STAIRS. This list of information will be known as the 'Publication Scheme'.
2.3	From the 1 st April 2027 onwards, PCHA will also respond in a timely manner to requests from tenants or their designated representatives for 'relevant information' relating to the social housing management functions that is not already available via the Publication Scheme.
2.4	PCHA will endeavour to keep the Publication Scheme up-to-date and will make additions to it, where appropriate, if new relevant information becomes available and where it agrees to provide responses to frequent requests for the same types of relevant information.

2.5	PCHA will make customers aware of the information that is available via the Publication Scheme and how they can make requests under STAIRS via a wide range of communication channels, e.g. through social media posts, response to individual interactions, customer newsletters.										
2.6	PCHA will work with customers to test the accessibility / effectiveness of the Publication Scheme, quality checking for STAIRS responses / monitoring performance and in developing any communications relating to STAIRS.										
2.7	PCHA will comply with any orders or recommendations made by the Housing Ombudsman for a review of the Publication Scheme or in response to how tenant requests have been handled after PCHA's initial response and review, as required.										
3	Policy										
3.1	Publication Scheme										
3.1.1	In line with Chapter One of the government's Policy Statement on STAIRS, PCHA will make available via its website a Publication Scheme which will contain information relevant to the provision and management of its social housing. This will include information on properties let at social rent, affordable rent and rent to buy but will not include information relevant to shared ownership or leaseholders.										
3.1.2	PCHA will create and maintain specific pages on its website for STAIRS information but may also include relevant information elsewhere on its website. To ensure accessibility PCHA will endeavor, where possible, to maintain 'two clicks' principles meaning information should be able to be located easily within two clicks.										
3.1.3	PCHA is not obliged to provide or respond to requests for information about wider business activities that go beyond the social housing management function, and this will include activities carried out by entities within the Sovini Group, of which PCHA is a member. The exception here is when Sovini Group partners carry out work on PCHA's behalf and this is relevant to the housing management function e.g. repairs and maintenance services carried out by Sovini Property Services.										
3.1.4	The Publication Scheme will contain broad classes of information as set out in the table below: <table border="1"> <thead> <tr> <th>Class of information</th><th>Information typically included</th></tr> </thead> <tbody> <tr> <td>Governance and decision making</td><td>Senior staff names and roles, organisational structure and governance arrangements. Decision making processes and policies, prioritisation of complaints, information on tenant consultations (including methodology), tenant meeting minutes and agendas</td></tr> <tr> <td>Spending</td><td>Spending, grants, use of service charge revenue</td></tr> <tr> <td>Housing stock management</td><td>Plans, maintenance work, progress towards net zero, stock transfers.</td></tr> <tr> <td>Performance</td><td>Inspections outcomes, ratings, performance reviews, evaluation reports, Tenant Satisfaction Measures, media releases, complaint metrics, information</td></tr> </tbody> </table>	Class of information	Information typically included	Governance and decision making	Senior staff names and roles, organisational structure and governance arrangements. Decision making processes and policies, prioritisation of complaints, information on tenant consultations (including methodology), tenant meeting minutes and agendas	Spending	Spending, grants, use of service charge revenue	Housing stock management	Plans, maintenance work, progress towards net zero, stock transfers.	Performance	Inspections outcomes, ratings, performance reviews, evaluation reports, Tenant Satisfaction Measures, media releases, complaint metrics, information
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	request data, health and safety performance and assessments, maintenance work, number of evictions.
Housing services	Description of services, advice, and guidance for tenants
Lists and registers	Information held in registers required by law and other lists and registers relating to the management of social housing
Social housing management	Policies and strategies relating to the management of social housing

- 3.1.5 Within the STAIRS requirements there is no prescribed list of documents or sources of information that should be provided. PCHA will operate an internal steering group made up of a broad cross section of staff that will meet regularly to decide which sources of information best meet the requirements and will endeavor to keep this information regularly updated.
- 3.1.6 PCHA will add to the Publication Scheme any new relevant information that becomes available or if it agrees to respond to individual requests that are of a similar nature, but it will not be expected to create new information sets to fulfill STAIRS requirements i.e. the information must already be held by PCHA.
- 3.2 **Responding to Requests for Information**
- 3.2.1 In addition to the Publication Scheme outlined above, from the 1st April 2027 PCHA tenants can request responses from PCHA for relevant information relating to the management of its social housing function.
- 3.2.2 For a request to be accepted, it must be made in writing, and this includes requests made by text or email. Within the relevant pages of the PCHA website, via the 'My Account' (customer portal facility) or on request, a form for submitting requests will be available (although it will not be necessary to use this form if tenants choose not to do so). Tenants also do not need to specify that they are making a request under the STAIRS scheme for it to be considered.
- 3.2.3 Where customers want to submit a request for information but would struggle to complete a request in writing, for any reason, PCHA will offer assistance to make a written record of the request (and will confirm details with the customer).
- 3.2.4 Only current PCHA tenants or their representatives acting on their behalf will be permitted to submit a STAIRS request, i.e. it will not be available to wider household members (unless they are acting on behalf of the tenant) i.e. it will not be available to prospective or former tenants.
- 3.2.5 For both the tenant submitting the STAIRS request and their designated representative (where this applies) PCHA will need to satisfy itself that it can confirm their identity and for representatives that they have authority from the tenant to act on their behalf. If PCHA is not able to establish identity or appropriate authority to act on behalf of a tenant, it will be within its rights to refuse to process the information request. The timescale of response will only commence once PCHA is satisfied that all necessary identities have been confirmed.
- 3.2.6 Where a request for information is accepted, PCHA will make best efforts to send a letter to the tenant or their representative confirming receipt of the request within three working

	days. In some circumstances where the request is complex or unclear, it may be necessary for PCHA to seek clarification from the tenant, which it will look to do at the earliest opportunity and this may have a knock-on effect on the timescales in sending the acknowledgement letter and the timescales for response. PCHA will maintain a record of all requests received and performance in meeting response times for reporting and accountability purposes.
3.2.7	PCHA will normally provide a full written response to a STAIRS request for information within 30 calendar days from receipt of the original request. Each request will be considered on an individual basis and responses may include: • Full details of the information requested • Details of where the information can be found if it is already publicly available • If PCHA is unable to respond to the request including full details of why not (e.g. it does not hold the information requested or there are justifiable reasons for refusing – See Section 3.3 below for more details) • A request is refused in part or in full, details of how the customer may request an internal review of PCHA’s decision and advice of how and when customers can contact the Housing Ombudsman for an independent review, if required
3.2.8	Only in exceptional circumstances will PCHA not be able to respond within the 30-day period and where this is the case, PCHA will endeavor to make contact with the tenant or their representative keeping them informed of any likely delay and the reasons why.
3.2.9	In all correspondence and contact in connection with STAIRS requests, PCHA will endeavor as far as is possible to meet customer’s preferred communication methods and in the vast majority of cases the information will be provided free of charge (unless there are excessive processing costs, in which case a small fee may apply).
3.2.10	In most cases where PCHA agrees to supply relevant information it holds, in response to requests, this will be free of charge and PCHA will endeavor to meet tenants’ preferred communication methods. It is envisaged most responses will be provided electronically via email, however, if there are excessive administration / postage charges or the request is for multiple copies of the same information, PCHA reserves the right to recoup these costs, and this will be determined on a case-by-case basis.
3.2.11	Where administration charges are to be applied, PCHA will advise customers what these charges are likely to be in advance of the information being supplied.
3.3	Reasons for refusal
3.3.1	When making decisions on what information to include on the Publication Scheme or in responding to individual requests, PCHA will need to have ‘due regard’ to UK General Data Protection Regulations and the UK Data Protection Act. It will not disclose any information that in its own right or when combined with other information contains ‘personal identifiers’ (means by which individuals can be identified) that could result in a breach of data protection legislation.
3.3.2	Where it is clear that requests for information include an element of personal data (related directly to the person making the request), PCHA may treat this part of the request as a ‘Subject Access Request’ under Data Protection Act requirements (See PCHA Data Protection Policy for full details).

3.3.3	In making decisions to publish or respond to requests for information, PCHA will also take balanced consideration of the likelihood of harm being caused if the information is released and will include consideration of the types of potential harm, the severity and the impact on any third party.
3.3.4	Where on the balance of probabilities the likelihood / severity of harm is high or there are other reasons why information should not be disclosed e.g. it has potential to breach confidentiality in trade negotiations, need to preserve value for money considerations, need to ensure health and safety or safeguarding concerns, PCHA may refuse a request outright or redact (block out certain parts of a document) information before release.
3.3.5	Where PCHA refuses or redacts information it will provide those making requests with clear reasoning why this decision has been made.
3.3.6	PCHA can only provide information it legitimately holds and as stated above this will be limited for the purpose of the STAIRS Publication Scheme / individual requests to information directly relating to the provision / management of the social housing function.
3.3.7	PCHA will also be able to refuse requests for information that would require staff input totaling 18 working hours or over.
3.3.8	PCHA will not respond to requests for information where the request is offensive or communicated in an abusive manner, repeated requests for the same information are made over short periods of time or where PCHA has already published a response to similar requests.
3.4	Appeals and Reviews of Information
3.4.1	Any PCHA tenant (or their representative acting on their behalf) may request PCHA to review the contents of its Publication Scheme, at any time if they believe PCHA holds relevant information and has not published it. Where this happens, PCHA will respond to the individual within 30 days either updating the Publication Scheme or advising why the information cannot be provided.
3.4.2	If PCHA refuses an individual request for information for any reason, customers can request an internal review of the decision, within three months of the issue of the refusal. Where this occurs PCHA will reconsider the request, with a different (and where possible, more senior) member of staff than made the original decision reviewing the case and providing an outcome response within 30 days (of receipt request being received).
3.4.3	On review PCHA may: • Uphold its original position • Publish information not previously published • Provide information that had previously been withheld (either in full or redacted) • Acknowledge failings in the handling of an information request and take action to put things right

3.4.4	In all written correspondence in connection with STAIRS requests to individual tenants (or their representatives), PCHA will make requesters aware that they can approach the Housing Ombudsman for advice at any time. Housing Ombudsman contact details are: • Online Complaints form available at https://www.housing-ombudsman.org.uk/ • Via email: info@housing-ombudsman.org.uk • Via telephone: 0300 111 3000 (9.15am-5.15pm: Monday to Friday) • In writing to: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
3.4.5	If PCHA tenants (or their representatives) are dissatisfied with the response from PCHA after it has had the opportunity to review and respond (as set out in 3.4.1 – 3.4.3 above), they may submit a complaint to the Housing Ombudsman, within three months of the issue, who will investigate and make an order or a recommendation. PCHA has committed to following or acting upon any determination that the Housing Ombudsman may make in regard to STAIRS information publication / requests.
4	Implementation
4.1	All PCHA staff will need to be aware of the STAIRS Policy to be able to direct and advise on any tenant queries, they may come across during the conduct of their business.
4.2	PCHA have established a cross team working group to ensure the relevant information contained within the Publication Scheme is appropriate and is kept up to date, within reasonable timeframes i.e. from the date new information becomes available or changes e.g. periodic up-dating of customer satisfaction data and for responding to individual requests.
4.3	The Sovini Group Data and Information Lead Officer, in conjunction with the Group Data Protection Officer will be responsible for determining any requests for information that may relate to personal information and will provide Subject Access Request responses (if appropriate) or provide reasoning why requests are refused.
4.4	The Sovini Group Director – Technology and Performance Improvement will have overall responsibility for the up-keep of this Policy, oversight of performance in meeting STAIRS requirements and for instigating any remedial actions, coordinating resource requirements as is necessary.
5	Performance
5.1	PCHA will record performance in relation to STAIRS requirements for: • Numbers of individual requests received • Numbers of responses where information has been provided in full / in part or redacted / refused (and the reasons why) • Performance in meeting stated timescales for response (including acknowledgements and full responses) • Any determinations and subsequent actions following investigation from the Housing Ombudsman
5.2	Collated reports on the above performance will be shared periodically with the PCHA Departmental Management Team (DMT), the PCHA Board, involved customer groups and will be made available alongside Publication Scheme information.

6	Consultation			
6.1	All PCHA staff have been consulted in the development of this Policy and detailed consultation has been undertaken with members of the STAIRS working group.			
6.2	PCHA involved customers have been consulted via the PCHA Customer Empowerment Panel.			
7	Review			
7.1	The PCHA STAIRS Policy will be reviewed every three years, as near as is possible from the date of Departmental Management Team (DMT) approval or as required by the introduction of new legislation, regulation or as a result of PCHA system audits. The review process will ensure its continuing suitability, adequacy and effectiveness.			
8	Equality Impact Assessment			
8.1	Was a full Equality Impact Assessment (EIA) required?	Yes		
8.2	When was EIA conducted and by who?	An Equality Impact Assessment was undertaken by the Strategic Regulatory Compliance Manager and the Data and Information Lead Officer in June 2026.		
8.3	Results of EIA	The EIA indicated there are no adverse or differential impacts for any groups with protected characteristics as a result of the operation of this Policy.		
9	Scheme of Delegation			
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it	DMT		
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation	Sovini Group Director – Technology and Performance Improvement		
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures	Sovini Group Director – Technology and Performance Improvement		
10	Amendment Log			
Date of revision:		Reason for revision:	Consultation record:	Record of amendments:
Not Applicable – first version		Not applicable	See Section 6	Not Applicable