
**Transparency, Publication Scheme and Social Tenant
Access to Information Policy**



10 September 2026

Board of Management

Our Commitment to Transparency

We believe that openness builds trust.

Trust is fundamental to the relationships we have with our residents, colleagues, Board Members, partners, regulators and the wider communities we serve. It is strengthened when people understand how we make decisions, how we deliver services, how we use our resources and how we continue to improve.

Transparency is more than sharing information. It reflects our values and the way we want to work. By making information available proactively and responding openly to requests, we help residents understand our organisation, influence the services they receive and hold us to account.

Being transparent also means being responsible. Some information must be protected because it relates to individuals, is confidential, affects safety or security, or cannot lawfully or reasonably be shared.

Our approach is simple:

We will be open wherever we can, careful where we must be, and clear about the reasons for our decisions.

Transparency is not the responsibility of one team or one individual. It belongs to all of us.

1. Why Transparency Matters

We provide homes and services for older and vulnerable people across Lincolnshire. Everything we do depends upon trust.

Residents trust us to manage their homes and provide good services. The Board relies upon good information to govern effectively. Colleagues rely upon one another to create accurate records and make informed decisions. Our partners and regulators expect us to act with integrity and demonstrate accountability.

Being open about our decisions, services and performance strengthens those relationships.

Transparency also helps us learn. The information residents ask us for can tell us what matters to them, what is difficult to find and where we could communicate more clearly.

The Social Tenant Access to Information Requirements — STAIRs — strengthen these principles by giving social housing tenants clearer rights to information about the management of their housing. We see these requirements as an opportunity to build upon our existing commitment to openness rather than simply as something we are required to do.

Our ambition, lived through our values, is to make transparency part of the way we work every day.

2. Purpose

The purpose of this policy is to explain how we will provide open, accessible and responsible access to information about the way we manage our social housing.

Through this policy we will:

- support openness, accountability and resident trust;
- publish information proactively wherever we reasonably can;
- meet the Social Tenant Access to Information Requirements;
- support the Transparency, Influence and Accountability Standard;
- make information easy to find and understand;
- respond fairly and consistently to requests for information;
- protect information where there is a lawful and reasonable basis for doing so;
- support residents who need help accessing or requesting information;
- use information requests and reviews as opportunities to learn and improve; and
- provide the Board with assurance that our transparency arrangements are working effectively.

This policy establishes our principles and governance arrangements.

Detailed processes for handling individual requests, reviews, redactions and publication will sit within supporting procedures and guidance.

3. Scope

This policy applies across Lace Housing and to our Board Members, colleagues, volunteers, agency workers and others working on our behalf.

Our contractors and partners will be expected to support our transparency obligations where this forms part of the services they provide or their contractual arrangements with us.

This policy applies to information in any format, including:

- digital records;
- paper records;
- reports;
- correspondence;
- photographs and other visual records;
- data and datasets;
- information held within our approved corporate systems; and

- relevant information held on our behalf by another person or organisation responsible for managing our social housing.

STAIRs provides formal information rights to our current social housing tenants and their designated representatives. The eligibility requirements are explained in section 9.

Our wider commitment to transparency is not limited to formal STAIRs rights. Where it is appropriate and lawful to do so, we may make information available more widely because we believe openness supports good governance.

4. Our Transparency Principles

4.1 We build trust

We share information openly because openness helps residents understand our organisation and have confidence in the way we work.

The information we provide should be accurate, timely, relevant and meaningful.

4.2 We are accountable

We will explain our performance, our decisions and how we use our resources.

Where residents challenge us or ask us for information, we will respond constructively and fairly.

4.3 We make information accessible

Information is only useful if people can find it, understand it and use it.

We will make reasonable efforts to provide information in accessible formats and recognise different communication needs, language barriers, disabilities and levels of digital confidence.

The revised TI&A Standard requires information for tenants to be clear, accessible, relevant, timely and appropriate to their diverse needs, and requires support for tenants to use online services where needed.

4.4 We manage information responsibly

Good transparency depends upon good information.

We will create and maintain accurate records, use approved systems and manage information in line with our Knowledge and Information Management arrangements.

We will also protect personal, confidential and other sensitive information appropriately.

4.5 We learn and improve

We will use information requests, reviews and resident feedback to identify opportunities to improve what we publish and how we communicate.

Where residents repeatedly ask for the same information, we will consider whether it should be made proactively available.

4.6 We work together

Transparency belongs to all of us.

Everyone who creates, manages, uses or publishes information contributes to our ability to be open and accountable.

5. How This Policy Fits with the Way We Work

Transparency forms part of our wider approach to good governance.

Our Strategic Plan establishes our commitment to resident voice, openness, accountability, good information and accessible services.

Our Knowledge and Information Management Standard explains how we create, manage, protect, retain and learn from information.

Our ICT and Cyber Security Policy supports the confidentiality, integrity and availability of that information.

Our resident engagement and complaints arrangements help us understand what residents need from us and where our services can improve.

This policy brings those principles together by explaining how we make appropriate organisational information available.

5.1 Considering transparency from the start

Transparency should not begin when somebody asks us for information.

When we create significant organisational information, we will consider:

- whether residents would reasonably expect us to publish it;
- whether it falls within our Publication Scheme;
- who is responsible for keeping it accurate and current;
- how residents will be able to access it;
- whether any information requires protection; and
- when it should next be reviewed.

This helps make transparency part of our normal way of working rather than something we add afterwards.

6. Legal and Regulatory Framework

Our approach is supported by a statutory and regulatory framework that establishes minimum expectations for transparency and access to information.

The Government's Social Tenant Access to Information Requirements Policy Statement sets out the detailed STAIRs requirements. The Regulator of Social Housing's Transparency, Influence and Accountability Standard requires private registered providers such as Lace to comply with those expectations.

This policy has therefore been developed with regard to:

- the Housing and Regeneration Act 2008, as amended by the Social Housing (Regulation) Act 2023;
- the Social Tenant Access to Information Requirements Policy Statement;
- the Secretary of State's Direction on Social Tenant Access to Information;
- the Transparency, Influence and Accountability Standard;
- the Consumer Standards Code of Practice;
- the Housing Ombudsman Scheme;
- the UK General Data Protection Regulation;
- the Data Protection Act 2018;
- the Equality Act 2010; and
- other legislation that may be relevant when deciding whether information can lawfully and reasonably be shared.

STAIRs is introduced in two phases:

From 1 October 2026 we must meet the Publication Scheme requirements.

From 1 April 2027 we must also meet the individual information-request requirements.

We will keep our policy, procedures and published information under review as the regulatory framework and Housing Ombudsman practice develop.

7. Roles and Responsibilities

7.1 Our shared responsibility

Transparency is achieved through the actions we all take.

Every colleague contributes by creating reliable records, maintaining information appropriately, protecting confidential information and helping residents access information.

Clear individual responsibilities support that shared commitment.

7.2 Board

The Board will:

- set the tone for openness and accountability;
- approve this policy;
- receive assurance that our STAIRs and Publication Scheme arrangements are effective;
- consider significant risks and learning arising from information requests and reviews; and
- ensure transparency supports resident influence and good governance.

The Board provides strategic oversight rather than managing individual requests.

7.3 Director of Operations

The Director of Operations will:

- provide leadership for implementation;
- ensure appropriate resources and responsibilities are in place;
- oversee significant information risks;
- consider organisational learning;
- ensure services cooperate in providing information; and
- provide assurance to the Board.

7.4 Policy Owner / STAIRs Lead

Transparency belongs to all of us, but our STAIRs arrangements need clear coordination.

The Policy Owner, supported by the appropriate colleagues, will:

- coordinate implementation of this policy;
- maintain oversight of the Publication Scheme and Publication Register;
- ensure appropriate arrangements are in place for receiving and recording STAIRs requests and reviews;
- monitor key timescales and performance;

- coordinate training and awareness;
- support consistent decisions about disclosure, withholding and redaction; and
- provide assurance to the Director of Operations and the Board.

This coordinating responsibility does not remove the responsibility of individual services for the information they create and manage.

7.5 Managers and Information Owners

Managers are responsible for ensuring that information within their services is reliable and can be located when needed.

Information included within our Publication Scheme will have an identified owner. Ownership will be recorded within our Publication Register and, where appropriate, our SharePoint metadata.

Together, managers and Information Owners will help ensure that information:

- remains accurate and current;
- is reviewed when required;
- is published promptly where appropriate;
- can be retrieved for information requests;
- remains accessible; and
- is managed in line with our wider information-governance arrangements.

7.6 All colleagues

We all have a responsibility to:

- create accurate and appropriate records;
 - store information in approved systems;
 - recognise that a written request may be a STAIRs request even where STAIRs is not mentioned;
 - pass requests promptly to the appropriate person;
 - protect personal and confidential information; and
 - support our commitment to openness.
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8. Our Publication Scheme

8.1 Our approach

We believe residents should not have to ask us for information that we can reasonably make available already.

Our Publication Scheme is therefore at the heart of our approach.

From 1 October 2026, STAIRs requires us to identify and proactively publish information that we hold and which falls within seven prescribed classes, make tenants aware of the Scheme so information can be easily found, and review and update the information regularly.

The seven classes are:

- 1. Governance and decision making**
- 2. Spending**
- 3. Housing stock management**
- 4. Performance**
- 5. Housing services**
- 6. Lists and registers**
- 7. Social housing management.**

Our Publication Scheme will explain what we publish within each class and how residents can access it. Board and Committee information will be considered at item level. Where appropriate, we may publish agendas, approved reports, decision summaries, minutes or redacted versions of those documents. Information requiring protection will normally be contained within separate confidential appendices.

8.2 Identifying what we should publish

We will identify the information we hold that falls within each of the seven classes and make it proactively available, subject to the same lawful and reasonable protections described in this policy.

Published information may include information about:

- our governance and leadership;
- our decisions and resident consultation;
- how we spend money;
- our homes and investment plans;
- repairs and maintenance;
- safety and compliance;
- environmental performance;

- service performance;
- Tenant Satisfaction Measures;
- complaints and learning;
- STAIRs information-request performance;
- services available to residents;
- relevant lists and registers; and
- policies and strategies relating to the management of social housing.

The seven classes are deliberately broad. Our Publication Scheme will therefore be a living resource rather than a fixed checklist.

8.3 Information we do not hold

STAIRs requires us to publish relevant information that we hold. It does not require us to create new records solely to populate the Publication Scheme.

8.4 Information that needs protection

Information within the scope of the Publication Scheme may be redacted where it is reasonable and appropriate to do so.

We will apply the same principles in section 11 when deciding whether information should be redacted before publication.

8.5 Keeping information current

Published information should be:

- accurate;
- clear;
- accessible;
- easy to find; and
- reviewed regularly.

Our Publication Register will record what we publish, where it is held, who is responsible for it and when it should next be reviewed.

8.6 Accessibility and choice

Our website will be an important route to published information, but it will not be the only way residents can access it.

We will make reasonable efforts to provide information in alternative formats and assist residents who are digitally excluded or need additional support.

8.7 Charges

Information published or provided under this policy will normally be available **free of charge**.

We will not charge for reasonable adjustments or accessible formats.

Where an exceptional charge may be appropriate because a resident requests additional physical copies or another arrangement that creates a direct additional cost, any charge will be reasonable, limited to the additional cost incurred and explained in advance.

8.8 Asking us to review publication

A tenant who believes we hold information that falls within the Publication Scheme but has not been published can ask us to review the position.

A designated representative can also act for a tenant.

We will normally complete a STAIRs review within **30 calendar days** of receiving it.

9. Information Requests

The individual information-request requirements apply from **1 April 2027**.

9.1 What information can be requested?

STAIRs applies to relevant information relating to the management of our social housing.

This can include information about policies, plans, actions and records supporting areas such as repairs, rents, service charges, estate management, anti-social behaviour, complaints, health and safety, data handling, stock management and environmental performance.

It does not apply to every piece of information we hold.

Information is not relevant information for a STAIRs request where, for example:

- it does not relate to the management of our social housing;
- it concerns matters determined by a local authority rather than by us;
- there is already a statutory right of access to that information through another legal regime; or
- it was created after the request was received.

Where another statutory route is more appropriate, we will make reasonable efforts to help the resident identify it.

9.2 Who can make a request?

A formal STAIRs request can be made by:

- a current social housing tenant of Lace; or
- a designated representative nominated by that tenant.

The applicant must be identifiable and the request must be made in writing.

A resident does not need to use the word STAIRs for the requirements to apply.

Where somebody needs help to make their request clear or put it in writing, we will make reasonable efforts to assist.

9.3 Getting the request to the right place

A communication might contain a service request, an ordinary complaint, a STAIRs request, a request for personal information, or more than one of these.

Residents should not have to work out which route applies.

We will identify the appropriate route and explain how each part will be handled.

Where a resident is asking for their own personal data, the request may instead need to be handled under data-protection legislation.

9.4 Responding to requests

We will acknowledge STAIRs information requests promptly.

We will respond promptly and no later than 30 calendar days after receiving a valid request.

We will only extend this period in exceptional circumstances permitted by STAIRs. The need to consider redaction, withholding or information held on our behalf will not, by itself, automatically justify an extension. The circumstances must genuinely be exceptional and any additional time taken must be reasonable.

Where an extension is necessary, we will tell the applicant before the original response period expires, explain why exceptional circumstances apply and tell them when they can expect our response.

Where we know of other information that may help answer the resident's question, we will direct them to it.

9.5 Information rather than documents

STAIRs provides access to relevant information.

That information may sit within a report, email, spreadsheet, database, Board paper or another record.

We will consider the information requested rather than assuming that an entire document must either be provided or withheld.

Where only part of a document needs protection, we will consider whether the remainder can be provided.

9.6 Information we do not hold

STAIRs gives residents access to information we hold; it does not require us to create new records.

Where we do not hold the requested information, we will explain this clearly and, where we can, help the resident identify other information that may assist.

We will never destroy, manipulate or alter requested information with the intention of preventing its disclosure.

9.7 Information held on our behalf

Some relevant information may be held by another person or organisation responsible for managing social housing on our behalf.

Where this applies, we will use all reasonable endeavours to obtain the information so that we can respond to the request.

We will keep appropriate evidence of the steps we have taken and will consider STAIRs when establishing and reviewing relevant contractual and information-management arrangements.

10. When We May Refuse a Request

Our starting point is that relevant information should be provided unless there is a proper reason not to do so.

STAIRs allows an information request to be refused where:

- it is reasonable to withhold the information;
- the applicant's identity cannot be established;
- the request remains unclear;
- the information requested is not relevant information;
- responding would require more than 18 hours of staff time;
- the request is repeated, including certain coordinated repeated requests; or
- the request is offensive or communicated in an abusive manner.

Refusal will not be our first response where we can reasonably help.

Where a request is unclear or too broad, we will consider whether helping the applicant clarify or narrow it could enable us to provide useful information.

Any decision to refuse a request will be recorded and explained.

11. Deciding Whether Information Should Be Withheld or Redacted

11.1 Our starting point

Our starting point is openness.

We will only withhold or redact information where there is a lawful and properly considered basis for doing so.

STAIRs requires us to have due regard to protections applying to certain classes of information under the Freedom of Information Act 2000, the Data Protection Act and other relevant legislation. It then requires us to balance factors favouring disclosure against the likelihood of harm arising from disclosure.

This does **not** make Lace subject to the Freedom of Information Act in the same way as a public authority. Those legal principles help inform the STAIRs reasonableness assessment.

11.2 How we will make the decision

When deciding whether it is reasonable to withhold or redact information, we will:

First, consider whether another law prevents us from sharing it.

If disclosure would conflict with another statutory provision, we will not disclose the information.

Then identify what needs protecting.

This might include interests relating to:

- personal data and privacy;
- legal professional privilege;
- genuine duties of confidence;
- commercial interests;
- health and safety;
- security;
- investigations or legal proceedings;
- negotiations or decision-making processes; or
- another interest recognised by relevant legislation.

We will consider the harm that disclosure could cause.

We will consider what the harm is, how serious it could be and how likely it is to occur.

We will not simply label information “confidential” or “commercially sensitive” and treat that label as sufficient reason to withhold it.

We will consider the reasons favouring openness.

These may include helping residents understand our decisions, scrutinise performance, understand how money is spent, promote accountability or contribute to matters affecting their homes and services.

Where information was provided by or relates to another person or organisation, we will consider their views about the likelihood of harm where required.

Finally, we will consider whether we can provide part of the information.

Before withholding information in full, we will consider whether appropriate redaction or partial disclosure would allow us to provide the remainder safely.

We will record the reasoning behind significant withholding or redaction decisions. Where information is withheld because disclosure would not currently be reasonable, we may review that decision where circumstances change or the reason for confidentiality no longer applies.

This approach reflects both the Government Policy Statement and the practical interpretation in the NHF/Anthony Collins operational guidance.

11.3 What we will not take into account

When deciding whether information should be withheld, we will not base our decision on:

- who the applicant is, except where necessary to establish eligibility;
- why the applicant wants the information;
- what they may do with it after disclosure; or
- concern that disclosure may result in criticism, embarrassment or reputational damage to us.

Being uncomfortable about publication is not, on its own, a reason to withhold information.

11.4 Personal information

We will protect personal information appropriately.

Where requested information contains personal data relating to another person, we will consider our obligations under data-protection law as part of the reasonableness assessment.

Where a resident is seeking their own personal data, we will normally consider whether the request should instead be handled as a subject access request under data-protection legislation.

11.5 Partial disclosure and redaction

Where only part of the information needs protection, we will consider whether the remainder can be provided.

Redactions will be applied securely.

Where we redact or withhold information, we will normally explain enough for the applicant to understand the reason for our decision, unless providing that explanation would itself reveal information that should be protected.

11.6 Explaining our decision

Where we refuse a request, withhold information or apply redactions, we will explain our reasons as clearly as we lawfully can.

We will also explain how the applicant can ask us to review the decision.

12. STAIRs Reviews

12.1 A separate review process

STAIRs reviews are not the same as ordinary complaints handled under our Complaints Policy and the Housing Ombudsman Complaint Handling Code.

We will publish our STAIRs review procedure and make it easy for residents and their representatives to find and use.

The Housing Ombudsman operates a distinct route for STAIRs complaints under Part 2B of its Scheme, separate from the normal housing complaints jurisdiction.

A STAIRs review may concern:

- information a tenant believes should have been published through our Publication Scheme;
- the handling of a STAIRs information request;
- information we have refused to provide;
- information we have redacted;
- a delay;
- the accessibility of information; or
- another matter relating to our compliance with STAIRs.

Residents should not be expected to identify the correct route themselves.

Where correspondence contains both an ordinary service complaint and a STAIRs issue, we will identify and manage the different elements appropriately.

12.2 How we review

We will normally complete a STAIRs review within 30 calendar days. Where additional time is genuinely required, we will keep this to the minimum necessary, explain the reason to the resident and tell them when they can expect the review outcome.

Where reasonably practicable, the review will be conducted by someone who was not responsible for the original decision and who has sufficient knowledge and authority to reconsider the matter properly.

A review may result in us:

- upholding the original decision;
- publishing additional information;
- providing information previously withheld;
- changing or reducing redactions;
- acknowledging that a request was not handled appropriately;
- identifying a training or process improvement; or

- making changes to our Publication Scheme.

We will explain the outcome clearly.

12.3 Housing Ombudsman

If the resident remains dissatisfied after our STAIRs review, they can refer the matter to the Housing Ombudsman through its separate STAIRs jurisdiction.

Our review response will explain how to do this.

The Ombudsman's Scheme sets separate arrangements for STAIRs complaints, and the Policy Statement requires providers to assist the Ombudsman, supply information it requests and comply with orders made under the Scheme.

Detailed referral timescales and case-handling arrangements will be maintained within our STAIRs procedure and resident guidance so they can be updated if the Ombudsman changes its Scheme or guidance.

13. Accessibility and Supporting Residents

Our residents have different communication needs, abilities and levels of digital confidence.

We will not assume that accessing information online is suitable for everyone.

We will make reasonable efforts to support residents to:

- find information within our Publication Scheme;
- understand information we have published;
- make a written STAIRs request;
- clarify what information they are seeking;
- use a designated representative or advocate;
- receive information in an appropriate accessible format; and
- understand how to ask us to review a decision.

We will make reasonable adjustments and use alternative communication arrangements where appropriate in line with our wider equality and inclusive-service commitments.

The TI&A Standard also requires accessible information and support for tenants to use representatives and advocates.

Digital access should increase choice, not remove other appropriate ways of communicating with us.

14. Learning and Continuous Improvement

Information requests can tell us something important about what residents want to know.

We will therefore look beyond the individual response and consider what we can learn.

This may include:

- identifying information that residents repeatedly request;
- identifying information that is difficult to find;
- improving the way information is explained;
- identifying gaps in our Publication Scheme;
- improving records and data quality;
- strengthening staff guidance or training; and
- using resident feedback to improve our approach.

Where appropriate, recurring requests may lead us to publish information proactively.

Learning from STAIRs will sit alongside learning from complaints, resident engagement, performance information and our wider assurance arrangements.

15. Monitoring and Assurance

The Board will receive proportionate assurance that our transparency arrangements are effective.

We will monitor:

- completeness of the Publication Scheme;
- information that is due or overdue for review;
- accessibility and website checks;
- STAIRs information-request volumes and themes;
- responses completed within required timescales;
- delayed responses;
- requests refused;
- information partially disclosed or redacted;
- STAIRs reviews and their outcomes;
- Housing Ombudsman referrals and outcomes;
- recurring requests that suggest further proactive publication;
- colleague awareness and training;

- significant information-governance issues; and
- improvements made as a result of learning.

Information-request data is itself identified within the STAIRs Performance publication class, so we will publish appropriate information about our handling of requests and reviews as part of our wider performance transparency.

Success will not be measured simply by whether we meet a deadline.

We will also consider whether residents can find useful information, whether published information remains accurate and whether transparency is helping residents understand and influence our services.

16. Policy Review

During implementation, we will review this policy annually so that we can learn from:

- implementation of the Publication Scheme;
- the introduction of individual information requests;
- our own experience of requests and reviews;
- resident feedback;
- Housing Ombudsman decisions and guidance;
- changes in regulatory expectations; and
- emerging sector good practice.

Once the arrangements are established and we have completed the first full year of individual information requests, the normal review cycle will move to at least every three years.

We will review the policy sooner whenever a change would benefit residents, strengthen our governance or is required by law or regulation.

17. Related Documents

This policy forms part of our wider governance framework and should be read alongside, where relevant:

- Strategic Plan;
- CP4 Code of Governance: Including Terms of Reference;
- CP5 Complaints Policy;
- CP8 Equality, Diversity and Inclusion Policy;
- CP9 Information Governance Policy;
- Knowledge and Information Management Standard;

- Records Retention Schedule;
- CP23 ICT and Cyber Security Policy;
- CP20 Stakeholder Engagement Strategy;
- CP17 Marketing and Communication Strategy;
- CP19 Procurement Policy;
- CP32 Risk and Assurance Framework; and
- relevant privacy information.

The following documents will support implementation of this policy:

- STAIRs Operational Procedure;
- Publication Scheme;
- Publication Register;
- Disclosure and Redaction Guidance;
- STAIRs Request Guidance; and
- STAIRs Review Procedure.

This distinction is deliberate: the policy sets our commitment and governance principles; the supporting documents explain how we put them into practice.

Appendix A – Key Definitions

Applicant

A tenant or their designated representative who has made a STAIRs information request.

Designated representative

A person nominated by a tenant to communicate with us on their behalf in relation to STAIRs.

Information Owner

The colleague or role responsible for ensuring a particular category of organisational information is appropriately managed, remains accurate and is reviewed when required.

Information request

A written request made under STAIRs by a current eligible tenant or their designated representative for relevant information relating to the management of our social housing.

Personal data

Information relating to an identified or identifiable individual. A request by somebody for their own personal data may need to be handled as a subject access request under data-protection legislation rather than STAIRs.

Publication Register

Our internal management record showing what information is published through the Publication Scheme, where it is located, who is responsible for it and when it should be reviewed.

Publication Scheme

The arrangements through which we proactively make information available within the seven classes prescribed by STAIRs.

Reasonableness test

The assessment we make when deciding whether it is reasonable to withhold or redact information under STAIRs. It includes having due regard to relevant legal protections and balancing the reasons favouring disclosure against the likelihood of harm from disclosure.

Redaction

The secure removal or obscuring of information before the remainder of a record is shared or published.

Relevant information

Information relating to the management of our social housing that falls within the scope of STAIRs. Information is not relevant information for a STAIRs request where another statutory right of access applies or where the information was created after the request was received.

STAIRs

The Social Tenant Access to Information Requirements. These require private registered providers to proactively publish specified information and, from 1 April 2027, respond to eligible information requests from tenants and their designated representatives.

STAIRs review

Our separate internal process for reconsidering a concern about information that should have been published or the handling or outcome of a STAIRs information request.

Tenant

For the purposes of STAIRs, this includes a tenant, licensee, shared owner who owns less than 100% of the equity in the property, and any other person in a landlord-tenant relationship with a private registered provider.

For clarity, this includes residents under Older Persons Shared Ownership arrangements who have purchased the maximum 75% equity share available under that scheme. Although they may have purchased the maximum share available under the scheme and may no longer pay rent on the remaining share, they still own less than 100% of the equity in the property for the purposes of STAIRs.

Formal STAIRs information requests can be made by current eligible tenants or their designated representatives.

Consequential Amendment to CP9 Information Governance Policy

As part of implementation of CP33 Transparency, Publication Scheme and Social Tenant Access to Information Policy, a consequential amendment is required to CP9 Information Governance Policy.

The amendment does not change the underlying data-protection framework within CP9. It clarifies the relationship between existing data-protection information rights and the new Social Tenant Access to Information Requirements (STAIRs).

The following section will be added to Section 11 – Subject Access Requests and Other Rights:

Social Tenant Access to Information Requirements (STAIRs)

STAIRs provides a separate right for eligible social housing tenants and their designated representatives to request information relating to the management of social housing.

STAIRs does not replace an individual's existing rights under data-protection legislation. A request for an individual's own personal data will normally be dealt with as a Subject Access Request in accordance with CP9 and the Association's data-protection arrangements.

A request may contain elements which fall under STAIRs, data-protection legislation, the Association's complaints arrangements or more than one of these routes. Residents are not expected to identify which route applies. The Association will identify the nature of the request and ensure that each element is dealt with under the appropriate requirements.

Where information being considered for publication or disclosure under STAIRs contains personal data, the Association will consider its data-protection obligations before disclosure and will withhold or redact personal information where required.

The Association's wider arrangements for STAIRs, including publication, information requests, review and disclosure, are set out in CP33 Transparency, Publication Scheme and Social Tenant Access to Information Policy and the supporting STAIRs procedures.

Review

This amendment will take effect alongside CP33. CP9 will otherwise remain unchanged pending its next scheduled three-year review, when the Policy will be reviewed in full against the current legal, regulatory and information-governance framework.