Social Tenant Access to Information Requirements (STAIRs) Policy

Date of Approval:

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the Brighter Places Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead

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1. Policy Statement / Purpose

This policy explains how Brighter Places will meet the Social Tenant Access to Information Requirements (STAIRs). It supports openness and accountability by:

- proactively publishing information about the management of our social housing;
- responding to eligible information requests fairly and within required timescales;
- protecting personal, confidential and legally privileged information;
- recording the reasons for withholding or redacting information; and
- giving tenants a route to request an internal review.

STAIRs is a principles-based transparency framework. It isn't the same as the Freedom of Information Act, although relevant Freedom of Information principles may inform our decisions. Neither is it a Subject Access Request (SAR), which covers personal data only.

2. Scope

This policy applies to information held by, or on behalf of, Brighter Places about the management of its social housing in England.

It applies to all employees, Board and committee members, contractors and managing agents involved in creating, holding, publishing or reviewing relevant information.

A request is outside the STAIRs route where its main purpose is not to obtain recorded information about the management of Brighter Places' social housing. This includes:

- requests for a tenant's own personal data, which will normally be handled as a Subject Access Request;
- complaints seeking a remedy, service action or investigation, which will normally be handled through the complaints process;
- requests for information unrelated to the management of our social housing;
- information about commercial, market-rented, private or other non-social-housing activities, unless it is relevant to the management of social housing;
- services delivered on behalf of local authorities that aren't part of our social housing management function;
- information that Brighter Places doesn't hold, including information held independently by another organisation;
- requests that require us to create new information, provide an opinion or answer a question where no recorded information is held; and
- requests made by a person or group that isn't eligible under the STAIRs requirements, unless an eligible tenant has authorised an individual representative to act for them.

Where a request falls partly within STAIRs and partly within another process, we'll explain this and route each part appropriately. Information will not be treated as out of scope merely because it may be withheld or redacted under section 7.4.

3. Commitment

We're committed to being open and accountable about how we manage our social housing. We'll make information available wherever possible, while protecting information that should not be disclosed. We'll:

- start from the position that information should be disclosed wherever possible;
- make information clear, accessible and easy to find;
- respond without considering the identity, motives or views of the requester, except where identity or eligibility must be confirmed;

- withhold or redact information only where there is a clear and proportionate reason to do so;
- explain our decisions;
- protect personal data and other information where disclosure could cause harm; and
- learn from requests by considering whether frequently requested information should be published.

4. Linked Documents

- SARs process
- Data Protection Policy

5. Legal and Regulatory Compliance

This policy supports compliance with the Social Tenant Access to Information Requirements policy statement, the Direction on the Social Tenant Access to Information Requirements 2025, the Regulator of Social Housing's Transparency, Influence and Accountability Standard, and the Housing Ombudsman Scheme. The Publication Scheme requirements apply from 1 October 2026 and the information-request requirements apply from 1 April 2027. Brighter Places will also comply with applicable data protection legislation, including the UK General Data Protection Regulation and the Data Protection Act 2018.

6. Publication scheme

6.1 Implementation

By 1 October 2026, Brighter Places will provide a dedicated area of its website through which tenants can access its STAIRs Publication Scheme and will identify and make available the information it holds that falls within each class specified in Chapter 1 of the government's STAIRs policy statement. The Publication Scheme will clearly identify that information, explain how tenants can access it and be kept under regular review.

Where information changes frequently, requires significant redaction, isn't suitable for routine publication; or is better considered in the context of an individual request, Brighter Places may redact, present in an accessible alternative form or replace by a summary only where that approach still provides the information required and there is a recorded, lawful and reasonable justification. Decisions will be approved through the agreed governance process and kept under review.

6.2 Information covered

Subject to lawful and reasonable restrictions, the Publication Scheme will cover all classes of information required by Chapter 1 of the government's STAIRs policy statement where Brighter Places holds relevant information. This will include:

- our governance structure and decision-making arrangements;
- corporate strategies, policies and plans;
- annual reports and regulatory information;
- financial information relevant to social housing services;
- service charges and explanations of how relevant costs are calculated;
- housing stock, repairs, maintenance and investment information;
- safety and compliance performance;
- complaints, satisfaction and service-performance information;
- tenancy and neighbourhood-management policies;
- tenant engagement and influence arrangements;
- equality, diversity and accessibility information;
- procurement and expenditure information where relevant; and
- registers or lists where publication is appropriate.

Information will normally cover the current period and, where relevant and available, the previous two financial years. The period covered may vary where a different reporting cycle or retention period applies.

6.3 Information outside the Publication Scheme or subject to withholding

STAIRs relates to information about the management of social housing. The following information may be outside the scope of the Publication Scheme or may need to be withheld, redacted, summarised or provided through another appropriate route:

- personal data about tenants, colleagues, contractors or other third parties. Requests for an individual's own personal data will normally be handled as a Subject Access Request;
- information unrelated to the management of our social housing, including human resources, payroll, private or commercial activities and other non-social-housing activities;

- information about decisions made by local authorities, including homelessness assessments, housing allocations, planning matters, housing benefit and council tax decisions;
- commercially sensitive information, confidential negotiations, pipeline strategy or draft material that has not been approved;
- security-sensitive information or information whose disclosure could create a health, safety or safeguarding risk; and
- unclear, repeated, abusive or excessive requests, including requests that would exceed the applicable staff-time threshold.

Information will not be treated as outside the Publication Scheme solely because it contains sensitive material. Where appropriate, Brighter Places will consider whether the relevant information can be published or provided in a redacted, summarised or alternative form. Information not routinely published may still be considered in response to an eligible STAIRs request.

6.4 Registers, Board papers and governance records

The guidance's reference to "registers and lists" doesn't mean that every internal register must be published in full.

Our initial Publication Scheme will treat relevant registers primarily as:

- compliance and building-safety performance information; and
- service and organisational performance information.

Individual Board and committee papers, minutes and internal governance records will not be routinely published through the Publication Scheme. This reflects Brighter Places' legal and governance assessment that these documents are not required to be proactively published under Chapter 1. Any request for a specific record that falls within Chapter 2 will be considered individually under this policy, including whether information can be provided in full, in redacted form or as a summary.

This position is based on our current legal and governance assessment. It isn't a blanket exemption: requests for specific records will be considered individually under this policy. The Governance Team will maintain a schedule of agreed inclusions, exclusions and alternative forms of publication.

6.5 Review and maintenance

The Governance Team will coordinate a formal review of the Publication Scheme every six months. Teams must notify Governance when published information becomes inaccurate or is replaced. Individual items will be updated in line with their reporting cycles; for example, some information will be updated annually and performance information may be updated quarterly.

The review will consider:

- whether links and documents remain current;
- information frequently requested by tenants;
- information that should be added, removed or archived;
- accessibility and ease of use;
- redaction requirements; and
- changes in regulatory or legal guidance.

7. STAIRs requests and reviews

From 1 October 2026, tenants may ask Brighter Places to review the information made available through its Publication Scheme. From 1 April 2027, eligible tenants may also make direct requests for information about the management of Brighter Places' social housing.

Current tenants and their authorised representatives may make a STAIRs request in writing. An authorised representative may include an advocate, family member, carer, solicitor or representative of a tenant group acting for an individual tenant. We'll ask for proportionate evidence that the tenant has authorised the representative to act and, where relevant, to receive the requested information. Requests may be made by email, letter, text message, or an identifiable message through an approved digital or social-media channel. The requester does not need to mention STAIRs for the request to be considered under this route, but it must relate to information covered by the STAIRs categories.

We'll provide reasonable support to tenants who need help putting a request in writing.

Former and prospective tenants aren't normally eligible to make a STAIRs request. Tenant panels, resident associations and other groups cannot make a request collectively, but an eligible current tenant may authorise an individual representative to act on their behalf. A former tenant may continue to pursue a review or complaint about a valid STAIRs request they made while they were a tenant.

STAIRs request timeline

Stage	Target timing	What happens	Lead responsibility
1. Request received	Day 0	Tenant or authorised representative submits a written request by email, letter, text message, or approved digital or social-media channel.	Receiving team to forward promptly to Governance.

2. Log and acknowledge	Normally within three working days	Governance logs the request, checks eligibility and scope, acknowledges receipt, and asks for clarification or identity evidence where needed.	Governance Team.
3. Identify information holders	As part of acknowledgement and triage	Governance identifies which teams, systems, contractors or managing agents may hold relevant information.	Governance Team with relevant service leads.
4. Internal collection	Normally within 10 working days of the internal request	Relevant teams search for and provide complete records, explain any missing information, and flag any sensitivity, redaction or third-party issues.	Relevant teams and nominated STAIRs leads.
5. Governance review and redaction	Before final response deadline	Governance reviews information for completeness, challenges gaps, consults specialists where needed, records redaction decisions, and prepares the response.	Governance Team, subject experts where required.
6. Approval and issue	Normally within 30 calendar days of a valid request	The approved response is issued to the tenant, explaining any information provided, withheld or redacted.	Governance Team and appropriate authorised approver.
7. Record learning	After response is issued	The request and disclosure logs are updated, and any learning is captured, including whether frequently requested information	Governance Team.

		should be added to the Publication Scheme.	
8. Internal review, if requested	Review usually requested within three months; outcome normally within 30 calendar days	A person who was not responsible for the original decision reviews the handling, disclosure, refusal, redaction or missing information issue and provides the outcome.	Independent reviewer, coordinated by Governance.

7.1 Request-handling process

Receipt and acknowledgement

Requests must be sent promptly to the Governance Team, which will:

- log the request;
- confirm whether it's eligible and within scope;
- acknowledge it, normally within **three working days**;
- seek clarification or identity evidence where needed; and
- identify the teams that hold the information.

A straightforward request may be answered through normal business processes. It must still be logged, and the tenant must be told that they can ask for formal STAIRs consideration if dissatisfied.

7.2 Internal collection period

Relevant teams will normally provide the Governance Team with all information they hold within **10 working days** of receiving the internal request. This internal target is intended to leave sufficient time for review, challenge, consultation and redaction.

Teams must:

- conduct proportionate searches;
- provide complete records rather than selected extracts;
- identify any information held by a managing agent;
- explain any missing or unavailable information; and
- avoid deleting or amending relevant records once a request is known.

7.3 Governance review

The Governance Team will:

- review the collected information for completeness;
- challenge gaps or unsupported proposed exclusions;
- consult Data Protection, Legal, Communications or subject specialists where necessary;
- identify personal, confidential or sensitive material, and apply and record any necessary redactions;
- prepare the proposed response and obtain approval from the appropriate authorised person before it is issued;
- issue the response to the tenant; and
- update the request and disclosure logs.

The final response will normally be issued within **30 calendar days** of receiving a valid request.

Where essential clarification or identity evidence is required, we'll ask for it promptly and explain in writing how this affects the response date. If more time is required, we'll tell the tenant the reason and the date by which they can expect a response. Any adjustment to the response period will be made only where permitted by the STAIRs requirements.

7.4. Withholding and redacting information

Disclosure is the starting point. Information may be withheld or redacted only where the STAIRs requirements permit this and it is reasonable and proportionate to do so. We'll consider the circumstances of the request, the nature and likelihood of any harm, the tenant and public interest in disclosure, and whether the information can be provided in part or in a less sensitive form. We won't disclose information where doing so would conflict with a statutory restriction.

Relevant considerations may include:

- personal data and privacy;
- safeguarding and health or safety risks;
- commercial sensitivity;
- confidential information;
- legal professional privilege;
- security or fraud risks;
- investigations and enforcement activity;
- confidential deliberation or decision-making;

- information intended for future publication; and
- legal restrictions on disclosure.

We won't withhold information solely because it may cause embarrassment, reputational damage, criticism or negative publicity.

For each significant withholding or redaction decision, we'll record:

- the information considered;
- the relevant risk or restriction;
- the likely nature and severity of harm;
- the public or tenant interest in disclosure;
- whether partial disclosure is possible; and
- the person who authorised the decision.

Where confirming whether information exists would itself create a relevant risk, we may neither confirm nor deny that it's held.

7.5. Requests requiring excessive resources

We may refuse a request where a reasonable estimate shows that locating, retrieving and extracting the information would require more than **18 hours of staff time**. The estimate, the activities included and the reasons for the decision will be recorded. Before refusing, we'll normally offer reasonable advice and assistance to help the tenant narrow or clarify the request and identify any related information already published.

Repeated, abusive, offensive or deliberately disruptive requests may also be refused following review by the Governance Team.

7.6. Third-party information

Information held by a managing agent on our behalf may be treated as held by Brighter Places. Relevant contract managers must use reasonable endeavours to obtain it and must record the steps taken.

Information independently held by an ordinary supplier or contractor isn't automatically information held by Brighter Places.

7.7. Charges and formats

Information will normally be provided free of charge.

We won't charge for:

- the first electronic or paper copy;
- information downloaded from our website;

- reasonable accessible formats, including large print or audio; or
- reasonable translation or communication support.

We may recover reasonable direct costs for:

- an additional copy of information already supplied in the same format;
- substantial printing requested instead of an available electronic copy;
- postage, binding or other physical production requested by the tenant.

Any charge must reflect the actual cost and be explained to the tenant in advance. No charge will be made for staff time spent locating, reviewing or redacting information.

7.8. Internal reviews

A tenant may request a review of:

- missing information from the Publication Scheme;
- a refusal or redaction;
- the format or handling of a response; or
- a failure to meet the policy's requirements.

Reviews should normally be requested within three months of the original decision.

A person who wasn't responsible for the original decision will conduct the review. We'll normally provide the outcome within 30 calendar days.

The review may:

- uphold or change the original decision;
- release additional information;
- require information to be published;
- identify a service failure; or
- recommend changes to policy, guidance or training.

The review outcome will explain that, if the tenant remains dissatisfied or does not receive a review response, they may bring a STAIRs complaint to the Housing Ombudsman. This is a STAIRs-specific route under the Housing Ombudsman Scheme and is separate from Brighter Places' complaints process and the Housing Ombudsman's Complaint Handling Code. The tenant will normally have three months to bring the matter to the Housing Ombudsman.

8. Responsibilities

Executive Team

The Executive Team will:

- approve this policy and material changes;
- agree categories that will be published or made available on request;
- decide disputed or unclear areas of guidance;
- oversee significant transparency risks; and
- approve the schedule of organisational interpretations appended to this policy.

Governance & Risk Team

The Governance & Risk Team will:

- coordinate implementation;
- maintain the Publication Scheme;
- manage and log requests and reviews;
- challenge business responses;
- coordinate redaction and approval;
- maintain disclosure and decision records;
- provide guidance and training; and
- report performance and themes to the Executive Team.

All teams

Each team must:

- understand the information it creates and holds;
- maintain accurate, retrievable records;
- identify information relevant to the Publication Scheme;
- keep published information current;
- provide requested information within the internal ten-working-day target;
- assist the Governance Team with clarifying requests; and
- nominate a lead contact for STAIRs.

Data Protection and Legal advisers

They'll advise on personal data, confidentiality, privilege, legal restrictions, commercial harm and complex disclosure decisions.

9. Training Requirements

- We'll provide colleagues with guidance and training on recognising, recording and referring STAIRs requests, including the applicable timescales and escalation route.
- We'll work with STAIRs Champions to support teams in identifying, locating and collating relevant information within the required timescales.
- The Communications Team will provide guidance or training to colleagues responsible for publishing and updating information on relevant website pages.

10. Monitoring and Review

We'll maintain:

- a Publication Scheme schedule;
- a request and disclosure log, including business-as-usual responses;
- redaction and refusal decisions;
- internal review outcomes;
- website review records;
- performance against internal and statutory timescales; and
- policy review at least every 2 years or when new information or process changes mean an update
- Performance will be reported to Executive Team at least every six months.

The Executive Team will monitor the ongoing application of this policy to ensure that it remains relevant, up to date and accessible to the intended audience.

11. Data Protection

Any personal data created or used in applying this policy must be handled in line with the Brighter Places Data Protection Policy and relevant privacy notices. Before publication, the Governance and Risk Team will review information to confirm that it is suitable for disclosure and that any necessary redactions have been applied to protect personal data, legally privileged information and other restricted information.

12. Equality, Diversity and Inclusion

We'll make the Publication Scheme and STAIRs request and review processes accessible to tenants. We'll make reasonable adjustments and, where reasonable, provide information in accessible formats, translation or interpretation, communication support and non-digital formats. We'll support tenants who cannot easily make a written request, including by helping them record their request through an appropriate channel. A tenant won't be disadvantaged because they are digitally excluded or need assistance to access information or use the STAIRs process.

13. Health and Safety

When deciding whether to publish or disclose information, we'll assess whether disclosure could create a health, safety, safeguarding or security risk. Where necessary, information will be withheld or redacted in line with section 7.4, while still providing as much information as can safely be disclosed.

14. Summary Roles and Responsibilities

Activities	Board	CEO	PGC	ARC	Exec	Managers	All staff	HR	Gov
Owner of the policy					X				
Monitoring & review of the policy									X
Approval of changes to the policy					X				
Responsible for policy implementation									X
Addressing issues in the implementation of the policy									X
Version control of live policy									X
Training of colleagues									X

TRANSLATIONS

If English is not your first language and you need a translation, we can get one for you.

ALBANIAN

Nëse anglishtja nuk është gjuha juaj amtare dhe keni nevojë për një përkthim, ne mund t'ua sigurojmë atë.

BENGALI

ইংরেজী আপনার মাতৃভাষা না হলে এবং আপনার কোন অনুবাদের প্রয়োজন হলে আমরা তা প্রদান করতে সক্ষম।

CHINESE

如果英文不是您的第一語言，而您需要翻譯的話，我們可以爲您安排。

GUJARATI

જો તમારી પહેલી ભાષા અંગ્રેજી ન હોય અને તમને ભાષાંતરની જરૂર હોય તો અમે તમને તે આપી શકીએ છીએ.

HINDI

यदि अँग्रेज़ी आप की पहली भाषा नहीं है और आप को अनुवाद की आवश्यकता है तो यह हम आपको प्रदान कर सकते हैं

KURDISH

Heke îngilîzî zimanê we yê yekem nîne û pêwîstîya we bi wergêr heye, em dikarin yekî ji we re bibînin

POLISH

Jeżeli język angielski nie jest Twoim językiem ojczystym i wymagasz tłumaczenia, możemy to zapewnić.

PORTUGUESE

Se o Inglês não é a sua língua materna e precisa de uma tradução, nós podemos obtê-la.

PUNJABI

ਜੇਕਰ ਇੰਗਲਿਸ਼ ਤੁਹਾਡੀ ਪਹਿਲੀ ਭਾਸ਼ਾ ਨਹੀਂ ਅਤੇ ਤੁਹਾਨੂੰ ਦੁਭਾਸ਼ੀਏ ਦੀ ਜ਼ਰੂਰਤ ਹੈ ਤਾਂ ਤੁਹਾਡੇ ਲਈ ਅਸੀਂ ਇਸਦਾ ਪ੍ਰਬੰਧ ਕਰ ਸਕਦੇ ਹਾਂ ।

SOMALI

Haddii Ingiriisku aanu ahayn afkaaga kowaad oo aad u baahan tahay turjumaad, annagaa kuu samayn karra.

URDU

اگر انگریزی آپ کی پہلی زبان نہیں ہے اور آپ کو ترجمہ کی ضرورت ہے تو ہم آپ کے لئے فراہم کر سکتے ہیں۔

VIETNAMESE

Nếu quí vị không thao Anh văn và cần bản dịch, chúng tôi sẽ giúp quí vị một bản.