Social Tenant Access to Information Requirements Scheme (STAIRs) Policy

2026-2027

Social Tenant Access to Information Policy

Adopted:	9 July 2026
Review Period: **Next Review:**	1 Years July 2027
Contact Officer:	Executive Director of Governance & Regulation & LHP's Data Protection Officer
Policy Version:	First version of policy
Version Reviewed by: **Version Approved by:**	Strategic Delivery Group 25 June 2025 Audit & Risk Committee 9 July 2026
Policy Links:	Complaints Policy Data Protection Policy Equality and Diversity Policy Record Retention Policy

Brief Policy Summary:

This policy explains how Lincolnshire Housing Partnership's (LHP) will share information with customers under the Social Tenant Access to Information Requirements (STAIRs).

It explains what we publish, how customers can ask for information, how we will respond, when we may refuse a request, and what customers can do if they are unhappy with our response.

Contents

Introduction

1. This policy explains how Lincolnshire Housing Partnership (LHP) will comply with the Social Tenant Access to Information Scheme (STAIRs) and the Housing Ombudsman's Scheme for complaints about STAIRs. There are two core components of STAIRs; proactive publication of information and responding to customer information requests.

2. We are committed to transparency, openness, and accountability in the management of our housing services. This policy implements the STAIRs giving all customers the right to access information about how we manage homes and services. We will be open, fair, and clear when sharing information.

3. By implementing STAIRs, we aim to:
   - empower customers by providing a right to request relevant information concerning property management, health and safety, and performance;
   - proactively share information by maintaining a Publication Scheme which routinely makes key information readily available to the public;
   - strengthen trust by fostering a culture of openness and honest communication, enabling customers to hold us to account for the quality and safety of their housing; and
   - ensure regulatory compliance by ensuring all requests are handled fairly and within a 30-day timeframe where applicable.

What this policy is for

4. This policy will:
   - ensure our customers can access information necessary to hold us accountable for the quality of housing and services provided;
   - promote openness and transparency in our services; and
   - detail the process for making information requests and the types of information available.

5. This policy explains: what information we publish; how customers can ask for information; when we may not be able to share information; how customers can ask for a review; and how we will monitor learning.

6. We will usually share information unless there is a lawful and reasonable reason not to.

Scope

7. This policy applies to customers (and their representatives), colleagues, contractors, and decision-makers within LHP. It outlines obligations when processing requests for information under STAIRs.

8. Information included within the scope of a request includes recorded information in any form, (this includes paper, email, audio, and digital records). Relevant information means recorded information relating to the management of social housing.

9. STAIRs is for non-personal information about how we manage social housing. If a customer

asks for their own personal data, we will deal with this as a Data Subject Access Request under our Data Protection Policy. If an information request includes both personal and management information we will explain how each part will be handled under the relevant policies.

10. The following are generally considered out of scope:
   - matters determined by local authorities;
   - activities not related to social housing management;
   - information relating to properties that are not social housing; and
   - wider organisational activities unconnected to housing management.

11. We are not required to create new information to comply with this policy. We will provide recorded information that we already hold and may collate or explain held information where reasonable to make it understandable.

Definitions

12. **Customer**: a current LHP tenant, licensee, shared owner owning less than 100% of the property equity, or any other person in a landlord-tenant relationship with LHP. Former or future customers can still ask for information, but these will not be handled under STAIRs. For the purposes of this policy references relate to customers or their designated representative.

13. **Designated representative**: any person nominated by a customer, to communicate on their behalf with LHP. They will need to be a nominated third party, Power of Attorney or provide a signed authorisation.

Roles and Responsibilities

14. LHP's **Data Protection Officer**, supported by the **Head of Governance and Regulation** has overall accountability for LHP's compliance with STAIRs, this Policy, and the Publication Scheme. This includes:
   - overseeing the publication scheme and arrangements for proactive publication of information;
   - providing advice and guidance on the application of this Policy;
   - maintaining records and monitoring compliance with STAIRs requirements;
   - reporting on performance, trends, and learning;
   - ensuring requests and review outcomes are appropriately recorded;
   - undertaking internal reviews where a complaint has been raised; and
   - promoting awareness of transparency and information governance across the organisation.

15. **Information Asset Owners for Service areas** are accountable for making sure the information in their areas is accurate, up to date, accessible and provided on time, in compliance with our information governance policies.

16. **All colleagues** are responsible for:
   - sending any information requested to the Data Protection Team within internal

timescales so LHP can respond to customers within 30 calendar days;

- making reasonable efforts to obtain relevant information held by third-party organisations responsible for managing housing on our behalf;
- guiding customers to other information resources relevant to their request, where they are aware of them; and
- completing regular training on identifying information requests and following this Policy.

17. The **Data Protection Team** will coordinate requests, keep records, and monitor performance.

Publication Scheme

18. We publish key information on our website so customers can find it easily without making a request and this is listed in our Publication Scheme. Customers should review the Publication Scheme to identify whether the information required is already made available.

19. Our Publication Scheme provides more detail about the information published within the following classifications:
    - Governance and decision making;
    - Spending;
    - Housing stock management;
    - Performance;
    - Housing Services;
    - Lists and registers; and
    - Social Housing Management.

20. Our Publication Scheme lists all the information published, which includes (but is not limited to):
    - Policies and procedures;
    - Performance information;
    - Information on how income is spent, and management costs;
    - Health and safety information and outcomes of inspections;
    - Information on property conditions, repairs, and improvements; and
    - Roles and responsibilities of senior colleagues, including the designated health and safety lead.

    We will regularly review and update this information to ensure it is current and accurate.

21. If the requested information is not proactively published, customers have a right to submit a written request for relevant information related to the management of their social housing. This includes:
    - information about the customer's specific home;
    - information about the management of the tenancy; or
    - general policies and procedures related to housing management performance data.

22. Customers who cannot use our website to review the Publication scheme can contact us for

help. Customers can view the Publication Scheme at Cartergate House, 26 Chantry Lane, Grimsby, Northeast Lincolnshire, DN31 2LJ between the hours of 8:30 and 17:30. We are considering other community access points where needed.

Support and reasonable adjustments

23. We want all customers to be able to access information. If a customer needs help, we will make reasonable adjustments where needed.

24. Information will be made available in a format that is accessible and appropriate to the needs of customers. This may include;
    - helping a customer make a written request;
    - providing information in large print, Easy Read, audio and other alternative formats;
    - arranging translation into other languages;
    - providing printed information for customers who cannot access the internet;
    - supporting customers by phone, in person or through a representative to make a request or make sure customers understand the information where required; and
    - considering other community access points where this would help customers access the Publication Scheme

Receiving and Managing Information Requests

25. Customers or their designated representatives can ask for information in writing. This can be via our online form, letter, email, or another written format. Customers do not need to use the word STAIRs. It is helpful if the request is clear and specific and we will need to check the customer's identity before responding. Our online form is easy to use and helps customers to identify if the information is already available. Customers can also contact us in person or by phone and we will assist in signposting customers to the information if it is already published or making an information request.

26. We will acknowledge requests and take reasonable steps to help customers make a request where support or reasonable adjustments are needed.

27. Sometimes a customer may include more than one issue in a request, such as a complaint, repair request, personal data request, or STAIRs request. We will separate these and explain how each part will be handled. Different timescales and review arrangements may apply, which we will explain to customers.

28. If we can answer a request quickly as part of normal service, we may do this without treating it as a formal STAIRs request. If the customer is unhappy with this, they can ask us to treat it as a formal STAIRs request., We may not be able to respond to a request for information if we cannot confirm the customer's identity or authority to act.

When we may not be able to share information

29. We will usually share information unless there is a lawful and reasonable reason not to. If we decide not to provide information, we will explain why.

30. We will not refuse a request because of:
    - an customers' identity or reason for the request, beyond ensuring they are a customer or a designated representative; or
    - how the information is to be used.

31. In deciding whether it is reasonable to withhold information, we will;
    - consider relevant laws, including data protection and confidentiality requirements;
    - balance factors favoring disclosure against the likelihood of any harm arising from disclosure, including potential harm to a third party; and
    - maintain a record of the reasons for the decision, including the factors considered and the basis on which the decision was reached.

32. We may refuse a request or withhold some information where:
    - information has already been published;
    - we cannot confirm the customers identity or authority to act on their behalf;
    - the request is not about social housing management;
    - the request is not clear and has not been clarified;
    - responding would take more than 18 hours and the customer has not agreed to narrow the request;
    - the request is repeated (from the same or multiple customers acting in coordination) offensive, abusive, or intended to disrupt services; or
    - sharing the information would break the law, reveal personal information, breach confidentiality, or unfairly harm another person or organisation.

33. Where information is withheld, we will explain the reasons for our decision and tell customers how they can ask for an internal STAIRs review and then complain to the Housing Ombudsman if dissatisfied with the review outcome.

Internal Review Process

34. If a customer is unhappy with how we have handled a request, they can ask for an internal review. This includes where they believe information should have been published, information has been withheld, or we have not responded within the required timescales.

35. Customers should normally ask for an internal review within three months of our response or, within three months of when our response was due.

36. Internal reviews are separate from LHP's Complaints Policy and are not managed under the Housing Ombudsman Complaint Handling Code.

37. Internal reviews will be overseen by the Data Protection Officer or Head of Governance and Regulation and, wherever possible, carried out by a colleague who was not directly involved in the original decision.

38. The review will check whether we handled the request properly, applied this policy correctly, met timescales, considered accessibility needs, and made reasonable decisions about any

information withheld.

39. We will acknowledge review requests promptly and provide a written response within 30 calendar days, unless exceptional circumstances mean we need more time. If this happens, we will explain why and tell the customer when they can expect a response.

40. If a customer remains unhappy after our review, they can contact the Housing Ombudsman Service.

41. Complaints relating to the handling of personal information will be dealt with under LHP's Data Protection Policy. Customers who remain dissatisfied with the handling of personal information can contact the Information Commissioner's Office.

42. We will record all learning from reviews and Housing Ombudsman decisions to improve compliance with STAIRs.

43. If a complaint about the handing of a request is received by the Housing Ombudsman we will cooperate with the Housing Ombudsman under the terms of the Housing Ombudsman Scheme and comply with any orders made, which could include reviewing the decision, providing an explanation, apologising, or releasing information where ordered.

44. We will also complete a lessons learnt review where good practice directions are issued by the Ombudsman to record and embed the recommendations.

Monitoring Performance

45. We will monitor requests, response times, refusals, reviews, reasonable adjustments, and Housing Ombudsman findings. We will use this learning to improve the Publication Scheme and how we respond to customers.

Lincolnshire Housing Partnership (LHP) Equality and Quality Impact Assessment (EQIA)

Title of Policy: Social Tenant Access to Information Policy

Lead Officer(s): Laura Brentnall

Date of EQIA: 09.02.2026

Scope and Purpose	
Briefly describe the policy/event/decision being assessed:	The policy sets out LHP's approach to ensuring compliance with the Social Tenant Access to Information Scheme (STAIRs).
What is the aim or purpose of this policy/decision?	This policy establishes a robust framework for transparency and accountability in our operations, ensuring that all Customers have clear and fair access to information about how their homes and services are managed.
Which departments or groups will be affected by this policy/event/decision?	All customers (and their representatives), colleagues, contractors, and decision-makers within LHP
Data Collection and Evidence	
What data or evidence have you used to identify how different groups may be affected? (e.g., customer demographic data, service usage statistics, consultation feedback)	This is something which has not been available to our customers before, so the impact is unknown at this stage, however this will be monitored. The publication scheme will be available online, and requests for information already published will direct the requestor to the information. The exception to this is where customers require reasonable adjustments in order to access the information already published. There will also be a copy available in our office reception and other locations for those who have limited or no digital access. There is ongoing engagement with customers to review options for providing access to the publication scheme. This includes discussions on which community points would be appropriate, especially in the absence of a reception at our Boston office.
What does this data tell you about the potential impacts on different equality groups?	This is new to the sector and LHP. The log will keep a record of any reasonable adjustment requests so assessments into the impact on different groups of customers can be undertaken.
RAG Impact Assessment on Protected Characteristics	
Use the RAG system to assess the level of potential impact for each protected characteristic: • **Red (High Risk): Significant potential for negative impact requiring immediate action to mitigate.**	

- **Amber (Medium Risk): Some potential for negative impact, which can be mitigated with changes.**
- **Green (Low or No Risk): Little to no negative impact identified.**

Ensure that you state reasons (the why) for your justifications.

Protected Characteristic	Impact (Positive, Negative, Neutral)	RAG Rating	Description of Potential Impact	Mitigation/ Enhancement Actions	Responsible Officer
Age	Neutral	Green	Policy improves access to information for all customers. However, older customers may have lower digital literacy and struggle with online access.	Provide information in multiple formats (paper, telephone, face-to-face). Offer support for digital access where needed.	
Disability	Neutral	Amber	Policy promotes transparency but may disadvantage individuals with visual, hearing, cognitive or mobility impairments if information is not accessible.	Ensure compliance with accessibility standards (e.g., large print, Easy Read, screen-reader compatible formats). Offer reasonable adjustments upon request.	
Gender Reassignment	Neutral	Green	No direct negative impact. Policy supports confidentiality and appropriate access to sensitive personal information.	Ensure strict confidentiality controls and colleague training on handling sensitive personal data.	
Marriage and Civil Partnership	Neutral	Green	No specific impact identified as policy applies equally to all customers regardless of marital status.	No action required. Monitor for any indirect impacts.	

Pregnancy and maternity	Neutral	Green	Policy supports access to personal information, which may be particularly important during maternity-related housing needs.	Ensure flexible access arrangements for those unable to attend in person (e.g., remote or proxy access).	
Race	Neutral	Amber	Language barriers and literacy levels may limit access to information for some customers.	Provide translation and interpretation services. Offer documents in different languages where needed. Ensure culturally appropriate communication.	
Religion or Belief	Neutral	Green	No direct impact, though some communication methods or timings may unintentionally conflict with religious practices.	Provide flexible communication options and respect religious needs where practical.	
Sex	Neutral	Green	Policy applies equally regardless of sex. No differential impact identified.	No action required. Continue monitoring.	
Sexual Orientation	Neutral	Green	Policy supports equal access and confidentiality, benefiting LGBTQ+ customers.	Reinforce data protection and confidentiality safeguards. Ensure inclusive colleague training.	

Mitigating Negative Impact	
What actions will you take to reduce or mitigate any identified negative impacts?	To reduce potential inequalities in access to information under this policy, the following actions will be implemented: • **Provide accessible formats** - Offer documents in large print, braille, Easy Read, and audio formats. Ensure digital content is compatible with screen readers and accessibility standards (WCAG).

Provide specific mitigation measures for each characteristic where a negative impact (Red or Amber rating) was identified.	• **Support digital inclusion** - Provide non-digital access routes (paper copies, telephone, in-person support). Offer assistance for customers who are not confident using online systems. • **Language and communication support** - Use clear, plain English in all communications. • **Reasonable adjustments** - Put processes in place to identify and respond to individual needs (e.g., disability, health conditions). Allow alternative methods for accessing information where required. • **Confidentiality and sensitivity** - Ensure robust data protection controls are in place, particularly for sensitive personal data. • **Flexible access arrangements** - Offer flexible options such as appointments, remote access, or nominated representatives where customers cannot engage directly. • **Monitoring and review** - Monitor access requests and feedback by protected characteristic (where appropriate). Review the policy regularly to identify and address any emerging inequalities.
Who is responsible for implementing these actions?	Service Leads and Managers across all departments will be responsible for ensuring the information is accurate, accessible, and linked to the publication scheme. In line with this, they will be responsible for ensuring information is provided in accessible formats on request.
Consultation and Engagement	
Have you consulted any stakeholders or equality groups? If so, who and how?	STAIRs and how we approach STAIRs has been through consultation with involved customers at the June 2026 Customer Forum and all colleagues through training and awareness sessions.
What feedback have you received, and how has this influenced your assessment?	RNIB guidance that information for partially sighted readers should use bright yellow with bold black text, and asked about an audio format for customers with a severe visual impairment. Boston does not currently have a public reception, and some areas have no easy place to pick up printed information and poor mobile signal, so paper remains important. Customers requested that if the Boston reception could not be re-opened then it was important for LHP to consider other ways to have the publication scheme available such as an LHP stall on Boston/Grimsby market day, community hubs, leaflet drops, and local shops and post offices.
Decision Making	
How has this EQIA	The Equality Impact Assessment has helped ensure that the Social Tenant Access to

informed or influenced the final decision?	Information Policy is fair, inclusive, and accessible to all customers. It identified potential barriers for certain groups, particularly in relation to digital access, disability, and language needs.
Were any changes made to the policy/decision as a result of the EQIA?	As a result, the final policy has been strengthened to include: • Accessible channels for making requests for information, such as being able to call and submit a request through colleagues. • Provision of information in alternative and accessible formats.
Monitoring and Review	
How will you monitor the actual impact of the policy/decision once it is implemented?	KPIs on: • % of requests submitted via non-digital channels • Number of requests requiring reasonable adjustments • Types of adjustments requested • Demographic breakdown of requestors and complaints • Themes from feedback/complaints These KPIs will be monitored on an annual basis by the Head of Governance and Regulation.
When will the policy/decision be reviewed?	The policy will be reviewed on an annual basis while STAIRs is embedded.
Sign-Off **EQIA Completed By:** ***Lead Officer(s) Name(s) & Date***	Laura Brentnall 19/06/26
Approved By: ***Approval Name: Date:***	Abigail Iyaho, Strategic Inclusion Lead 01/07/26