

Social Tenant Access to Information Policy

V 2.0 FINAL

1. Purpose

This policy sets out how Broadacres Housing Association will comply with the Social Tenant Access to Information Requirements (STAIRs) so that current customers and their representatives can access information about the management of our social housing and hold us to account for the quality of our homes and services.

We will take a proactive, transparent approach to publishing information we hold and to responding to eligible information requests, unless it is reasonable to withhold or redact information or disclosure would conflict with another legal requirement.

We will comply with the following implementation dates:

- Chapter 1 - Publication Scheme: from 1 October 2026.
- Chapter 2 - Information Requests: from 1 April 2027.

2. Scope

This policy applies to Broadacres Housing Association, all employees, and any third parties responsible for managing our social housing on our behalf where relevant to STAIRs. It covers proactive publication of information, responses to information requests, and the internal STAIRs review process.

3. Regulatory Framework and Policy Principles

This policy is based on the STAIRs, the Regulator of Social Housing's Transparency, Influence and Accountability Standard, and the Consumer Standards Code of Practice.

Our approach is guided by transparency, openness, accountability, and accessibility. We will start from a presumption in favour of disclosure, while ensuring that data protection, confidentiality, safeguarding, health and safety, legal privilege, commercial sensitivity, and other relevant statutory protections are carefully considered.

When deciding whether information should be withheld or redacted, we will not take account of the reason for the request, the intended use of the information, or any reputational impact that disclosure may cause.

4. Responsibilities

4.1 *Board and Committees*

The Board and the Group Customer Experience Committee are responsible for ensuring that Broadacres complies with STAIRs and for receiving assurance

and performance information relating to publication, information requests, reviews, and any related learning.

4.2 *Executive Director Team (Exec)*

Exec is responsible for approving the STAIRs Policy and the initial Publication Scheme

Exec will receive regular performance and compliance information relating to the management of STAIRs requests and will instruct improvements to practice or amendments to this policy where necessary.

4.3 *Assistant Directors*

Assistant Directors are responsible for ensuring that their teams can identify potential STAIRs requests and escalate these appropriately. They are also responsible for identifying information within their service areas that falls within the publication scheme, ensuring the version control of published information, that it remains accurate and up to date, and supporting timely responses to requests.

4.4 *The Governance Team*

The Data Protection Officer is the STAIRs Champion for the organisation. The STAIRs Champion leads on the review of documents and makes recommendations as to whether certain documents may be published or may need to be redacted prior to publication and therefore has sufficient experience, training and support to be able to understand freedom of information and data protection law principles and how they apply within a STAIRs context.

The Governance and Risk Business Partner will include sample checking of information published on the Broadacres website within the annual second line assurance programme to help ensure that the publication scheme remains up to date.

The Governance Team is responsible for receiving, logging, and coordinating initial STAIRs requests and for maintaining appropriate records of decisions and timescales.

4.5 *The Complaints Team*

The Complaints Team will coordinate internal STAIRs reviews separately from the standard complaints process. Reviews will be conducted by a member of the Complaints team, and they will maintain a record of reviews, outcomes and lessons learned.

5. Publication Scheme and Accessibility

5.1 *Proactive publication*

We will proactively publish information we hold which falls within the classes defined in Table 1 of the STAIRs Policy Statement (Annex 1). This includes information about governance and decision making, finance and spending, housing stock management, performance, housing services and customer liaison, lists and registers, and social housing management policies and strategies.

We will keep information within the publication scheme under regular review so that it remains accurate, current, and accessible.

5.2 Accessibility, formats, and charges

We will consider the diverse needs of customers, including those arising from protected characteristics, barriers arising from language, literacy, disability, or digital exclusion, or those with other support needs, and will ensure that communication with, and information for, customers is clear, accessible, relevant, timely and appropriate.

Information will generally be made available electronically and free of charge. Where a customer requests information in hard copy or in an alternative accessible format, we will make reasonable adjustments and provide a single copy free of charge unless genuinely exceptional circumstances apply. Any charge for additional copies will be limited to the actual cost of reproduction and postage.

5.3 Out of scope information, redaction and withholding

We are not required to create new information to comply with either the publication scheme or information requests. When deciding whether information falls within scope, we will consider whether it relates to the management of our social housing and whether it is information we hold.

Some information may fall outside the scope of STAIRs, for example information relating to local authority functions, non-social housing activities, property that is not social housing, or wider business activities unconnected with social housing management.

It may be necessary to redact or withhold information prior to publication or in response to a request. Decisions to redact or withhold information will be made in accordance with the STAIRs reasonableness test and recorded appropriately.

6. Information Requests and Internal Reviews

6.1 *Who may make a request*

Requests must be made in writing and must identify the applicant. A valid request may be made by a current social housing customer of Broadacres or

by their designated representative, where that representative has been identified to us and, where necessary, their authority can be confirmed.

6.2 *Handling of requests*

We will acknowledge requests promptly and aim to do so within five working days, in line with our complaints procedure. We will provide reasonable support to help applicants make clear and valid requests, including support for customers who need assistance to submit a request in writing.

We will respond within 30 calendar days of receipt of a valid request. Where clarification or verification of identity is required, the response period will run from the date that clarification or verification is received. In exceptional circumstances, we may apply a reasonable extension and will inform the customer at the earliest opportunity.

Where information is held by a third party responsible for managing our social housing on our behalf, we will use all reasonable endeavours to obtain that information. We will not alter, destroy, or manipulate information with the intention of preventing disclosure.

6.3 *Business as usual responses*

Some requests may be dealt with as part of normal business processes where that is quicker and does not reduce the quality, quantity or accessibility of the information provided. Where we do this, we will explain that the customer may still request a formal STAIRs response if they remain dissatisfied, and we will record the request appropriately.

6.4 *Relevant information and grounds for refusal*

Relevant information means information relating to the management of our social housing. We may refuse a request where the information is not relevant information for the purposes of STAIRs, we do not hold the information, the identity of the applicant cannot be established, the request remains unclear after reasonable efforts to seek clarification, the request would exceed 18 hours of staff time, the request is repeated, or the request is offensive or communicated in an abusive manner.

6.5 Reasonableness Test

When deciding whether it is reasonable to withhold or redact information, Broadacres will have due regard to freedom of information principles, data protection law, and other relevant legislation.

We will balance the factors favouring disclosure against the likelihood of harm arising from disclosure, whether the information is already publicly available, whether public interest outweighs the risks and, where relevant, consider the views of third parties.

We will not take account of the purpose of the request, the intended use of the information, or any reputational impact that disclosure may cause. We will record the reasons for decisions to withhold, redact, or refuse information.

6.5 *Responses*

Our response will explain the information provided or, where applicable, why information has been withheld, redacted, or refused. We will provide information in a format that is accessible to the customer and will signpost other appropriate sources where relevant.

6.6 *Internal STAIRs reviews*

If a customer believes we have not published information that should appear in the publication scheme or is dissatisfied with the handling of or response to an information request, they may request an internal STAIRs review. This review route is separate from Broadacres' standard complaints process.

A request for a review should normally be made within three months of the original decision. We will aim to complete the review within 30 calendar days of receipt. If the customer remains dissatisfied after the internal review, they may escalate the matter to the Housing Ombudsman in line with the Ombudsman Scheme.

7. Governance and Oversight

We will maintain appropriate arrangements to demonstrate compliance with STAIRs and support transparent, accountable service delivery. Performance against this policy will be reported routinely to Exec and the Group Customer Experience Committee, with an annual report to Board.

8. Equality Impact Assessment

An Equality Impact Assessment has been carried out.

This policy promotes transparency and customer empowerment. The main risks arise from written request requirements, digital reliance, and potential accessibility barriers. These risks are mitigated by our commitment to provide reasonable support, accessible formats, and appropriate adjustments so that customers can exercise their rights under STAIRs.

Annex 1: Publication Scheme

This Annex sets out how Broadacres Housing Association will proactively publish information relating to the management of its social housing. We are committed to openness and transparency and will make information available in a way that is clear, accessible, and easy to find. Information within this scheme will usually be available on our website, kept under regular review and, unless stated otherwise, cover the current position and the previous two financial years.

(a) How information will be published

Information within this scheme will normally be available electronically via Broadacres' website. Where a customer asks for information in hard copy or in an alternative accessible format, we will make reasonable adjustments and provide a single copy free of charge unless genuinely exceptional circumstances apply. Any charge for additional copies will be limited to the actual cost of reproduction and postage.

Class of information	Information Broadacres will typically publish	How information will usually be made available
Governance and decision making	Information about who we are, our governance structure, Board and Committee arrangements, senior leadership, constitutional documents, decision-making frameworks, and customer engagement arrangements relevant to social housing management.	Website pages and downloadable documents.
Finance and spending	Audited accounts, financial statements, relevant reports about rents, spending, procurement relating to housing management services, and other financial information relating to the management of our social housing.	Website pages, annual reports, and downloadable documents.
Housing stock management	Information about our homes and how we manage them, including strategic plans, asset and investment information, repairs and maintenance information, stock condition data, compliance	Website pages, reports, and summary documents.

Class of information	Information Broadacres will typically publish	How information will usually be made available
	information, and relevant improvement programmes.	
Performance	Tenant Satisfaction Measures, annual reports to customers, service performance information, complaints performance information, Ombudsman outcomes where appropriate, and other performance information relating to social housing management.	Website pages, performance reports, and annual publications.
Housing services and customer liaison	Descriptions of services for customers, advice and guidance, customer engagement opportunities, contact routes, and customer-facing service information.	Website pages, guides, and customer communications.
Lists and registers	Relevant statutory or operational registers and summary compliance information relating to the management of our social housing, where publication is appropriate and lawful.	Website pages, summaries, and downloadable documents.
Policies and strategies	Policies, strategies, and procedures that affect customers' rights, services, safety, homes, and responsibilities in relation to social housing management.	Policy library and downloadable documents.

(b) Information that may not be published

Some information may fall outside the scope of this scheme, for example information relating to local authority functions, non-social housing activities, property that is not social housing, draft or working material, or wider business activity unconnected with social housing management. We may also redact or withhold information where it is reasonable to do so, including where disclosure would conflict with data protection, confidentiality, safeguarding, health and safety, legal privilege, commercial sensitivity, or other legal requirements.

(c) Customer feedback and reviews

If a customer believes information that should appear in this publication scheme is missing, inaccessible, or has been redacted without a reasonable basis, they may request an internal STAIRs review in line with section 6 of this

policy. We will also use customer feedback to improve the publication scheme over time.