



Social Tenants Access to Information Scheme (STAIRs) Policy

1. Purpose

- 1.1 This policy sets out how Irwell Valley Homes (IVH) will meet its obligations under the Social Tenant Access to Information Requirements.
- 1.2 STAIRs gives social housing tenants rights to request information about how their homes are managed.
- 1.3 IVH is committed to being open and transparent with our tenants and we will implement STAIRs in a way that is accessible, practical, and consistent with the trust our tenants place in us.
- 1.4 The policy sets out how IVH promotes access to information through a formal **publication scheme** enabling tenants and their representatives to access information proactively and to support tenants make information requests.
- 1.5 This policy applies alongside, but does not replace, our existing obligations under UK GDPR, Data Protection Act 2018. The Data Use and Access Act 2025 forms part of the UK data protection framework.

2. Scope

- 2.1 This policy applies to:
 - All colleagues of IVH and any third parties contracted to provide social housing management services by IVH as the Private Registered Provider.
 - All social housing tenants of Irwell Valley Homes, including:
 - Assured and secure tenants in social or affordable rented accommodation
 - Shared owners holding less than 100% equity in an Irwell Valley Homes property
 - Licensees and other occupiers of our social housing
- 2.2 This policy **does not** apply to market rent tenants, leaseholders owning 100% of their property, shops, offices, former tenants, or prospective tenants

3. Regulatory Framework

- 3.1 This policy is based on the Social Tenant Access to Information Requirements ("STAIRs") introduced under the amended Transparency, Influence and Accountability ("TI&A") Consumer Standard issued by the Regulator of Social Housing ("RSH").

4. Principles

4.1 STAIRs covers relevant information that IVH holds that relates to the management of our social housing. This includes information about repairs, maintenance, rent, service charges, estate management, complaints, health and safety, anti-social behaviour, policies and strategies, staffing, environmental performance, and housing stock management.

4.2 The following is not relevant information under STAIRs:

- Information created after the date of the request
- Matters determined by local councils, such as housing allocations or homelessness decisions
- Information about services unconnected to our social housing functions
- Information accessible through another statutory (legal) route, where this applies, we will direct the tenant to the correct route

4.3 A tenant's own personal data. This is accessed through a Subject Access Request (SAR) under data protection law (see Section 12).

4.4 STAIRs applies only to information that we hold at the time the request is received. We are not required:

- to create new information,
- provide explanations,
- or generate analysis in order to respond to a request.

However, we will provide reasonable assistance to help tenants understand the information we disclose.

5 Publication Scheme (Chapter 1)

5.1 From 1 October 2026, we will maintain a Publication Scheme which outlines the categories of information we proactively publish about our housing management. The scheme is attached as an annex to this policy and is also available on our website and in hard copy on request.

5.2 Information will be available on our website www.irwellvalley.co.uk and will be regularly updated. The information will be published across the following seven categories, where we hold it:

- **Governance and decision-making:** our governance arrangements, decision making, senior colleague information, Board and Committee member details and our customer engagement arrangements.
- **Spending:** information on our income and expenditure.
- **Housing stock management:** information on properties, repairs and maintenance programmes and progress towards net zero.
- **Performance:** Information relating to how we are performing against the Tenant Satisfaction Measures (TSMs), our RSH regulatory grades and notices, complaints information, health and safety performance, repairs performance, eviction numbers.
- **Housing services:** information on the services we provide and how to access them.
- **Lists and registers:** statutory registers and other lists relating to our social housing management
- **Social housing management:** policies and strategies we use to manage our social housing

- 5.3 We will not create new records to meet the publication scheme requirement, where information within scope requires redaction before publication, we will apply redactions consistently and document our reasons.
- 5.4 We will review and update the Publication Scheme regularly to ensure it remains accurate and up to date. Where information within a category is not published directly, the scheme will explain how tenants can access it.
- 5.5 We will make tenants aware of the Publication Scheme through our website, welcome packs, newsletters and other tenant communications.
- 5.6 We are committed to making information listed in our Publication Scheme available free of charge online. If information is requested to be provided in an alternative format (i.e. hard copy, in large print, braille, a translated copy or audio format) we will also provide a single copy of this information free of charge. Any requests for information in an alternative format should be made within the information request.
- 5.7 Where an individual requests additional copies of information, we may apply charges strictly to cover the actual costs incurred in providing additional copies.

Charges may apply for additional copies in the following circumstances:

1. Printed or Hard Copy Documents

- Black and white printing/ photocopying: 2pence per sheet.
- Colour printing/photocopying: 3 pence per sheet.
- Binding or large volume printing: charged at cost.
- Postage and packaging: charged at Royal Mail rates.

2. No Charge for Inspection

Information may be inspected at our offices by appointment free of charge. Please contact us to arrange an appointment on 0300 561 1111.

Tenant Feedback on the Publication Scheme

Tenants can provide suggestions for improvements to this Scheme via:

- Customer portal
- Email to Informationgovernance@irwellvalley.co.uk
- Tenant meetings or via your Housing Officer
- Our website.

6 Information Requests (Chapter 2)

- 6.1 From 1 April 2027, any social housing tenant, or their designated representative, may submit a formal information request.
- 6.2 Requests **must** be made in writing, including by email or online submission. The request should include sufficient detail to enable us to identify and locate the information requested

and include the name and contact details of the person making the request. We will acknowledge receipt of every request promptly (normally within 5 working days).

6.3 We recognise that some tenants may require additional support to make a request and we will ensure that appropriate arrangements are in place to support all tenants to be able to exercise their rights under STAIRs

6.4 Requests should be sent to:

- Email: Informationgovernance@irwellvalley.co.uk
- Post: Irwell Valley Homes, PO Box 7074, Manchester, M28 8JW.
- Online: (Web form link)

Clarification

6.5 If a request is unclear, we will contact the tenant to ask for clarification and explain what additional information we need. If we need to seek clarification the response times will be adjusted to allow for this.

Timescales

6.6 We will respond to all valid requests within 30 calendar days. However, in exceptional circumstances we may require additional time, we will write to the tenant within the original 30-day period explaining the reason, giving a clear expected response date, and confirming that their right to complain and escalate the request is not affected.

Redirection

6.7 Where the information requested is already available in our Publication Scheme, we will direct the tenant to it rather than duplicate a response by providing a further separate response.

6.8 Where information is accessible through a separate statutory route, we will explain this clearly and direct the tenant to that route rather than respond under STAIRs. Where we are aware of other relevant information sources, we will signpost the tenant to them.

7 Information held by third parties

7.1 Where relevant information is held by another body managing housing on our behalf, we remain responsible for that information under STAIRs. We will use all reasonable endeavours to obtain it in order to respond to requests, balanced against the availability of resources. We will keep details of our contacts where it is necessary to reach out to third parties for the information.

8 Withholding information

8.1 We will not withhold information without a clear and justifiable reason. In deciding whether to withhold information, we will have due regard to the protections afforded to certain categories of information under the Freedom of Information Act 2000, UK GDPR and the Data Protection

Act 2018 and will balance factors in favour of disclosure against the likelihood of genuine harm to colleagues, customers or other stakeholders, arising from disclosure.

8.2 Where relevant information was provided by or relates to a third party, we will consider the views of that third party about the likelihood of any harm arising from disclosure before deciding whether it is reasonable to withhold the information.

8.3 We may withhold information where:

- It is reasonable to withhold the information from disclosure
- Disclosure would be likely to cause harm. For example, where it engages personal data of third parties, legal proceedings, commercial confidentiality, or safety and security concerns
- The identity of the applicant cannot be established
- The request is unclear and cannot be clarified despite our reasonable efforts
- The information requested is not relevant information as defined in this policy
- Responding would exceed 18 hours of staff time — in this case we will write to the tenant and suggest how the request could be narrowed
- The request is repeated, including where multiple tenants appear to be coordinating requests
- The request is offensive or abusive or intended to disrupt our services

8.4 When assessing whether to disclose the information, our presumption is that the information should be disclosed unless the information is such that there is a likelihood of harm being caused by disclosure which includes:

- Type of harm – physical, mental, financial, or operational / commercial.
- Severity – how serious could the harm be?
- Likelihood – is harm speculative, possible, or reasonably likely?
- Harm to third parties – e.g., other individuals, third party organisations, whether or not the information is in the wider public interest to disclose or withhold.

8.5 All decisions to withhold information will be documented, including the information and reasoning relied upon as well as any consideration of partial disclosure.

9 Partial Disclosure and Redaction

9.1 Before withholding information entirely, we will always consider whether partial disclosure with appropriate redactions is possible.

9.2 Where we provide a redacted document, we will:

- Clearly indicate where information has been removed
- Explain the reason for each redaction, including the relevant circumstances relied upon to allow the tenant to understand the remaining information where reasonably practicable.

9.3 Where appropriate, we will also explain whether:

- The redacted information may become available at a later date, and

- Any steps (such as the conclusion of legal proceedings) may affect this

9.4 We will ensure that redactions are applied consistently and that decisions are recorded in line with our information governance arrangements.

10 Refusals

10.1 If we refuse a request in whole or in part, we will write to the tenant within the 30-day response period explaining:

- The specific conditions relied upon
- The steps we have taken to consider partial disclosure
- Their right to request an internal review
- Their right to escalate the request to the Housing Ombudsman if dissatisfied following review

10.2 Where appropriate, we will also:

- Provide advice and assistance to help the tenant refine their request
- Explain whether the requested information may become available at a later date

11. Review Process and Complaints

11.1 If a tenant believes we have failed to publish information that falls within scope of our Publication Scheme or are dissatisfied with how we have managed an information request, it should be raised through our internal STAIRs review process.

How to request a review

11.2 Reviews should be submitted in writing, marked clearly as a STAIRs Review Request, to the Governance & Assurance Team at:

- Email: Informationgovernance@irwellvalley.co.uk
- Post: Irwell Valley Homes, PO Box 7074, Manchester, M28 8JW
- Online: (Web form link)

11.3 We will carry out a review and respond in writing within 30 calendar days. Where additional time is required, we will notify the tenant and explain why. Every response will inform the tenant of their right to escalate the matter directly to the Housing Ombudsman if they remain dissatisfied.

Escalation to the Housing Ombudsman

11.4 If a tenant remains dissatisfied after our internal review, or if we have not completed the review within 30 calendar days, they may escalate directly to the Housing Ombudsman Service. The Housing Ombudsman is the designated external complaints body for STAIRs and may require us to put things right. Housing Ombudsman Service Website: www.housing-ombudsman.org.uk Telephone: 0300 111 3000 Post: PO Box 152, Liverpool, L33 7WQ.

12. Data Protection

- 12.1 STAIRs operates alongside data protection law and does not replace it. UK GDPR, Data Protection Act 2018 and the Data Use and Access Act 2025 continue to apply in full.
- 12.2 Any requested information which amounts to personally identifiable data will not be disclosable under STAIRs but may be disclosed under data protection laws as a subject access request, where information is sought by the tenant about themselves. Where we consider that your request amounts to request for personal data we will process your request in line with our subject access requests policy available at Data Privacy Policy.
- 12.3 Where relevant information contains personal data about third parties, we will remove the data before releasing it. We will not use the presence of third-party personal data as a reason to withhold an entire document where partial disclosure is possible.
- 12.4 For further information as to how we handle your personal data, please see our privacy policy at [How we use personal data - Irwell Valley Homes](#) .

13. Performance Reporting

- 13.1 We will maintain details of all STAIRs requests, recording the date received, information requested, date of response, outcome, and whether any review or escalation followed.
- 13.2 The Governance & Assurance Team will report to Leadership Team on STAIRs compliance quarterly. Where patterns in requests suggest that information should be added to our Publication Scheme proactively, we will do so.
- 13.3 We will provide tenants with information about how we are performing against this policy and the actions we are taking to improve performance where required.

14. Roles and Responsibilities

- 14.1 Overall responsibility for STAIRs compliance sits with the Board. The Executive Director of Corporate Service is responsible for ensuring that the policy is implemented across the organisation.

Role	Responsibility
Executive Director of Corporate Services	Policy implemented
Head of Governance & Assurance	1. Maintaining and updating the Publication Scheme
Heads of Service	- Information from their business area in the publication scheme is accurate and up to date and provided to the communications team for publishing. - Identifying opportunities for proactive publication - Overseeing information requests - Sit on review panel - Ensuring STAIRs obligations are included in relevant third-party contracts where required

Governance & Assurance Team	• Coordinating responses to information requests • Managing the internal review process • Maintaining information governance arrangements for STAIRs • Maintain a log of all requests • Reporting on compliance to senior leadership • Provide independent advice on data protection, confidentiality and information • Support the decision making in relation to redaction and disclosure of personal data • Advise on risks associated with disclosure
Managers	• Responding to information requests as requested by the Governance & Assurance Team • Providing information for proactive publication
Colleagues	• Recognising a STAIRs request and processing it in accordance with procedures • Signposting customers to the publication scheme and informing them where information can be provided

15. Equality and Diversity

15.1 Irwell Valley Homes is committed to equality, diversity and inclusion. We will ensure our approach to STAIRs does not disadvantage tenants with protected characteristics, language barriers, or additional support needs, and that all tenants can access and exercise their rights under this policy.

Version Control

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Policy Owner:	Executive Director of Corporate Services
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Lead Team	Governance & Assurance Team