Social Tenants Access to Information Requirements (STAIRs)

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Author Title & Issuing Department	Company Secretary Governance, Risk and Assurance
Target Audience	All Staff

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Links to Regulatory Standards – Economic/ Consumer Standards	Transparency, Influence and Accountability Consumer Standard
Outcomes for Customers	Improvement in access to information about how emh manages and delivers housing services.
How were tenants, residents and service users involved in the review/development of this document	This policy is a legal requirement and has been drafted by our Solicitors. However, consultation with the Resident Influence Committee will take place and any suggestions made by the RIC will be incorporated into an updated version.
Training Provision	Under development
Links to the Business Plan	4.5 Business and Financial Resilience
Links to Key Values	**Integrity** – ensuring we maintain the highest standards **Accountability** – being accountable to our customers and stakeholders **Openness** – being open and transparent in all areas of the business

Version Control

Version	Revision Date	Author: Job Title	Change Description
1	September 2026	Company Secretary	New Policy

1. Introduction

1.1 STAIRs helps tenants or their chosen representatives access information about how their landlord manages and delivers housing services. This may be available through information that emh publishes regularly or through specific information requests made by tenants.

1.2 This policy explains how emh will meet the Government's Social Tenant Access to Information Requirements (STAIRs) which is a transparency regime under the Social Housing Regulation Act 2023. The aim is to be open and transparent, helping tenants understand how decisions are made and how services are delivered.

1.3 We are committed to making information accessible and easy to obtain wherever possible. This policy explains:

- what information we will publish
- how tenants can request information
- how we will respond to requests
- when information may be withheld
- how tenants can ask for a review if they are unhappy with a decision.

2. Definitions and scope

2.1 This policy applies to all employees of emh group and its subsidiaries in its role as a registered provider of social housing. It does not explicitly apply to those areas of the business that are not regulated by the Regulator of Social Housing, but the same principles will apply. STAIRs cover:

- information published through our Publication Scheme;
- requests for information made by tenants or their representatives; and
- the review and complaints process relating to STAIRs

3. Specifics of the policy

3.1 Regulatory Framework

The Social Tenant Access to Information Requirements (STAIRs) form part of the Transparency, Influence and Accountability Consumer Standard introduced by the Regulator of Social Housing. The requirements are intended to give tenants better access to information about how their homes and services are managed.

STAIRs introduce two main requirements:

- A Publication Scheme, where landlords make key information available to tenants without needing a request. This applies from 1 October 2026.
- An Information Request process, allowing tenants and their representatives to ask for information about the management of social housing. This applies from 1 April 2027.

3.2 Policy principles

We support the principles of openness, transparency, accountability and tenant involvement. We want tenants to understand how services are delivered and how decisions affecting their homes and communities are made.

Under the Publication Scheme, we will publish information that helps tenants understand how we operate and manage social housing services. We will take a proactive approach to publishing information wherever possible.

Under the Information Request process, tenants and their representatives can ask for information relating to the management of social housing. We will normally provide the information requested within 30 calendar days unless there is a valid reason to withhold or redact it.

When considering requests, we will focus on whether there is a lawful reason to withhold information. We will not refuse requests simply because the information may be critical of emh Group or could result in negative publicity.

Our approach will always be to share information unless there is a good reason not to do so.

3.3 The requirements

The STAIRs scheme has two key phases:

a) Publication Scheme (Chapter 1)

Our Publication Scheme explains:

- the types of information we publish
- where the information can be found
- how tenants can access it.

b) Information Requests (Chapter 2)

Tenants and/or their representatives can request information about the management of social housing services. We will have a clear process for receiving, recording and responding to requests.

emh will maintain a record of requests received and our response times to support monitoring, accountability and continuous improvement.

Information available under STAIRs will generally be provided free of charge. We are committed to providing information in accessible formats whenever required.

4. Implementation

4.1 Out of scope / withheld information

STAIRs does not require emh to create new information that does not already exist.

When deciding whether information should be published or disclosed, we will consider whether it falls within the scope of STAIRs and whether any legal restrictions apply. In some cases, information may need to be partially redacted before it is provided.

Information may be withheld where there is a valid reason to do so, such as protecting personal data, maintaining confidentiality, safeguarding individuals, or complying with legal requirements.

If information is withheld or redacted, we will explain why wherever possible. If you disagree with our decision, you can ask us to review it using the process outlined below.

4.2 Review and complaints process

You may ask us to carry out a review, if you believe we:

- have not handled your information request appropriately
- have not provided information you are entitled to receive, or
- have withheld information without a valid reason.

A review request should normally be made within three months of receiving our decision.

The review may consider whether:

- we responded correctly to your request
- information was provided in an accessible format
- relevant information should have been published
- our response was provided within the required timescales
- information was appropriately withheld or redacted.

We aim to complete reviews within 30 calendar days. If additional time is needed, we will explain why and keep any extension to a minimum.

If you remain dissatisfied following our review, you may refer the matter to the Housing Ombudsman.

4.3 **Data protection and security**

We take the protection of personal information seriously. Some information requested under STAIRs may contain personal data or information that could identify an individual. In these circumstances, we may be unable to disclose the information.

Where a request relates to a person's own personal information, the request may need to be handled under data protection legislation as a Subject Access Request rather than through STAIRs.

For more information about how we collect, use and protect personal information, please refer to our Privacy Policy www.emh.co.uk/privacy-notices/

5. Responsibilities

5.1 Overall responsibility for this policy lies with the Company Secretary.

Day to day implementation of this policy lies with the Governance, Risk & Assurance Officers.

All staff are required to familiarise themselves with the wording and obligations listed under this policy.

5.2 This policy and the STAIRs scheme will be reviewed regularly to ensure accuracy and compliance.

6. Annex 1

6.1 Model Publication Scheme

This Annex sets out the basis on which emh group will proactively publish information relating to the management of its social housing function. We are committed to being open and transparent about the way we work, the services we provide and the decisions we make. The information covered by this scheme is included in the classes of information set out in the table below, where this information is held by us. The link below sets out a non-exhaustive list of classes of information we routinely publish, how to access them, and any applicable charges. Much of the information may already be freely available on our website. We publish information within each class which is up to date and correct as at the date of publication.

www.gov.uk/government/consultations/social-tenant-access-to-information-requirements-consultation/outcome/social-tenant-access-to-information-requirements-policy-statement

6.2 How will relevant information under STAIRs be published?

Information will be available on our website at www.emh.co.uk/STAIRs and will be regularly updated.

6.3 Formats other than online

Information listed in our Publication Scheme is available free of charge online. If information is required in an accessible alternative format, we will provide a single copy of this information free of charge.

However, 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:

a) Printed or hard copy documents:

- Black and white printing/ photocopying
- Colour printing/photocopying
- Binding or large volume printing
- Postage and packaging

b) Alternative formats:

If information is requested in an alternative accessible format (e.g., large print, Braille, audio format), we will provide the information free of charge.

We will also provide one translated copy of any information you request free of charge.

c) No charge for inspection

Information may be inspected at our offices by appointment free of charge. Please contact us to arrange an appointment using the email GRA-team@emh.co.uk

6.4 **Tenant feedback on this publication scheme**

Tenants can provide suggestions for improvements to this scheme via:

- MyHomeOnline (our resident portal)
- email to GRA-Team@emh.co.uk
- resident engagement panels / groups / meetings

6.5 **Reviews**

If you consider that we have not included information in our publication scheme, or that we have unduly redacted information which you consider ought not to be redacted, please request a review at GRA-Team@emh.co.uk. We will normally complete a review within 30 days.

7. Annex 2

7.1 Responding to information requests:

7.1.1 Who can make requests?

We will respond to information requests that are made either by a tenant registered with us, or by their designated representative.

The scheme is not open to either former or prospective tenants.

We will only respond to requests where we can confirm the identity of the requesting tenant and their representative (where appointed). There are no restrictions on tenants as to whom they may choose as their representative.

7.1.2 How to make a request for information

We will accept requests that are made in writing, including either by email, text message and social media, as long as we can identify who you are. Your request does not have to specifically mention “STAIRs” for it to be considered under the scheme, if the request is made in writing and we are able to identify you.

We recognise that certain 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.

By email: GRA-team@emh.co.uk

In writing: Governance, Risk and Assurance team, Memorial House, Whitwick Business Park, Coalville, Leicestershire, LE67 4JP

7.1.3 How long will it take us to respond?

We will provide an acknowledgement of receipt of your request within 5 working days of receipt.

We will respond to your request within 30 calendar days from receipt of your request, or where the request requires clarification, 30 days from receipt of the clarification. We will take reasonable steps to assist tenants and/or their representatives where any request requires clarification.

In exceptional circumstances it may be necessary to extend the timeline for a response. Where this is necessary, we will inform you at the earliest opportunity. Every effort will be made to respond in a reasonable timeframe where any extension is required.

If there is likely to be any delay in providing a response, we will ensure that we provide you with a reason for the delay together with our best estimate as to when you may be likely to receive a response.

7.1.4 Obtaining information from third parties

information may be held by a third party responsible for the management of social housing on our behalf. If this is the case, we will use all reasonable endeavours to obtain the information, taking account of our duty to comply with the requirements balanced against the need for a proportionate approach and the availability of resources. We will keep logs of our contacts where it is necessary to reach out to third parties for the information.

7.2 Refusing to respond to information requests:

7.2.1 We may refuse to respond to an information request where any of the following apply.

- It is reasonable to withhold the information from disclosure.
- Disclosure of the information may cause harm (where we have reasonably balanced the factors favouring disclosure against the likelihood of any harm arising from that disclosure).
- Your identity (or that of your representative) cannot be established.
- The meaning of the request is not clear, and you have not responded to our reasonable efforts to seek clarification.
- The information requested is excluded on the basis that it is not relevant information (i.e. does not come within the scope of an information request under STAIRs).
- The work involved in responding to the request would exceed 18 hours of staff time.
- The request is excessive, in that it is repeated (including where we receive repeated requests from multiple tenants acting in coordination or seeking the same information).
- The request is offensive or communicated in an abusive manner or is clearly intended to otherwise cause disruption to our organisation.
- The information is clearly available via another means (i.e. published on our website), whereby we will provide you with details of where to find the information.

We may also redact information where it is appropriate and reasonable to do so.

7.2.2 What does “reasonable” mean when responding to requests?

When considering whether it is reasonable to withhold any information in response to your request, we are required to have “due regard to” data protection laws (and any other relevant statutes). We are also required to balance factors favouring disclosure against the likelihood of any harm arising from the disclosure.

In having “due regard” we must ensure that we consider whether the information falls within a class of information under STAIRs and data protection laws and whether releasing the relevant information could cause harm. “Due regard” means that we must consider or take account of any legal principle or legislation, but it does not mean that we must follow that principle automatically. We should be able to justify why they consider that protected class under relevant laws, may apply to the request and record their reasoning.

We will start from the presumption that the information should be disclosed in response to a request unless the information is such that the factors in favour of withholding (or redacting) the information outweigh the benefits of making the information available.

When considering the likelihood of harm being caused by the disclosure we will take the following factors into account.

- 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 the information is in the wider public interest to disclose or withhold.

For example, there is often a public interest reason in withholding information on the basis that there is a need to ensure:

- confidentiality around formulation of decisions and pipeline discussions or protect a negotiating position
- value for money and maintain competitive position in a market
- the health and safety of any individual or prevent disclosure of information which could prejudice any investigation.

Where the relevant information was provided by or relates to a third party, we must consider the views of that third party regarding the likelihood of any harm. When assessing the risk of harm, our approach is that the reference to “third party” here means any third party or individual (i.e. not solely a body responsible for the management of social housing instructed on our behalf).

In addition, we are not obliged to disclose information under STAIRs where we already provide disclosure of relevant information pursuant to other statutory provisions (for example, we are legally required to provide to Companies House information about our corporate activities, such as the filing of our annual return).

7.3 Other factors we will / won’t consider when disclosing information

When considering whether to disclose relevant information we will not take into account:

- the identity of the tenant
- any purpose to which that information may be put
- any reputational risk or negative public interest for us which may be either caused or inferred by any disclosure.

We will ensure that information is published in the spirit of openness and transparency as laid down by the scheme.

Where we either withhold information from disclosure, or we provide information but with redactions, we will explain our reasons for this as part of our response. If it is necessary to extend the timelines for a response where we need to consider whether withholding or redacting information is required, we will let you know as soon as possible, together with our likely timeline to provide you with a response.

When disclosing information, we will take all reasonable steps to ensure that information is provided in a format which is accessible to you, or to your preference.

How to make a request

All information requests for STAIRS should be directed to the Data Protection Team at dataprotection@emh.co.uk

8. Associated Documents

Data Protection Policy