Tenant Access to Information

POLICY

Version Number: 1
Approval Date: September 2026
Approved by: CEO
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Responsible Officer: CEO

1.0 Policy Statement

This policy aims to ensure that tenants are able to access information from their landlord. The policy sets out how HYELM will promote access to information through a formal publication scheme enabling tenants and tenants' representatives to access information proactively, and to support tenants to make information requests.

2.0 Purpose

This policy sets out how HYELM will comply with the government's Policy Statement entitled the Social Tenant Access to Information Requirements, or "STAIRs", ensuring transparency, openness and tenant empowerment in being able to hold their landlord to account. HYELM does not provide social housing, our mission is to provide affordable housing to young working people in London and in doing so, we aim to act fairly and transparently as Landlord's.

3.0 Scope

This policy applies to all employees of HYELM. Social Tenant Access to Information Regulations cover the publication of information, responding to information requests, and reviews and complaints.

4.0 Regulatory Framework

4.1 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").

4.2 The Ministry for Housing Communities and Local Government ("MHCLG") has issued a Direction to RSH requiring it to introduce a new Consumer Standard enabling tenants to access information held by Private Registered Providers ("PRPs"). Further to a consultation, RSH has issued an amended TI&A Standard under which PRPs are required to comply with the STAIRs Policy Statement, which sets out the requirements for PRPs to issue a Publication Scheme and secondly to respond to information requests from tenants and their representatives.

4.3 STAIRs is designed to enable tenants and their designated representative to be able to access information which supports tenants to know more about how their services are delivered, either through information disclosed as part of a formal publication scheme or by

responding to specific requests for information from tenants. The requirement to introduce a Publication Scheme takes effect from 1 October 2026. The submission of Information requests regulations take effect from 1 April 2027.

5.0 Policy Principles

5.1 STAIRs take a principles-based approach in line with the RSH Consumer Standards. Key principles include:

- transparency,
- openness,
- accountability and
- tenant involvement in how their services are delivered.

5.2 Under the publication scheme providers must proactively publish information which they hold and which fall within one or more of the classes of information set out the publication scheme (please see Appendix 1 of this Policy).

5.2 The Policy Statement does not provide a prescriptive list as to precisely which documents landlords are required to provide. Instead, providers retain flexibility as to what information they may provide as long as they take a proactive approach to publication. The emphasis of the Policy Statement is in favour of disclosure.

5.3 The Regulations sets out that tenants (or their designated representative) may make a request for relevant information to their provider. Relevant information is defined as information relating to the management of a registered provider's social housing. Providers should proactively respond to requests within 30 days, unless there are reasonable grounds to withhold information, such as where the information amounts to a protected class of information under freedom of information or data protection (or other) laws or where the harm caused by the disclosure would outweigh the benefit in the provider disclosing the information.

5.4 Providers should provide information irrespective of the reasons for the request or how the information may be used following disclosure and should disregard any perceived adverse impact or negative publicity which may be caused by the disclosure.

5.5 The government's intention to promote transparency and accountability under STAIRs means that PRPs should take a proactive approach to the publication of documents and consider that information ought to be published unless there is a good reason why information ought not to be published

6 Requirements

6.1 The STAIRs scheme has two key phases:

- Chapter 1 Publication Scheme
- Chapter 2 Information Requests

6.2 Information available under STAIRs is generally available free of charge. Where information is required in a non-electronic format, please contact our team to discuss your requirements. HYELM is committed to ensuring that information is made available in a way that is accessible as possible for all our tenants.

6.3 Our Publication Scheme (Chapter 1) details what classes of information will be published and how that information will be published and is available at Appendix 1 of this Policy.

6.4 Our process for handling information requests (Chapter 2) is set out at Appendix 2 to this policy. HYELM will maintain a log of all information requests and timelines for responding to requests for reporting and accountability purposes.

7. Out of Scope / Withheld Information

7.1 HYELM is not required to create new information to comply with either the publication scheme or information requests.

7.2 When considering whether the information should be published, HYELM will consider if the information comes within the classes of information set out in Table 1 of our Publication Scheme.

7.3 It may be necessary to redact documents prior to publication. We have also included in Appendix 1 some suggested categories of information which may be out of scope of STAIRs – please note this is not an exhaustive list.

7.4 When considering an information request HYELM will consider whether any information may need to be withheld or redacted in response to your request. Any withholding or redaction of information must be reasonable and in line with the principles set out.

7.5 Appendix 2 to this policy sets out how we will respond to requests for information and how we will consider "reasonableness" when assessing whether information should be withheld or redacted. If, on receipt of any response in relation to your request, you consider that information has been redacted or withheld without a reasonable basis for doing so, we refer you to our review process set out in section 8.

8. Review and Complaint Process

8.1 If you consider that HYELM has not published information or responded to your request for information appropriately or you are otherwise dissatisfied with the handling of your request please contact xxxx to request a review.

8.2 A request for a review should generally be made within 3 months of receipt of the original decision.

8.3 The purpose of any review will be to assess:

i. how we have responded to your request for information (for example, where we may not have provided information in an accessible format);
ii. where we have not published relevant information that we may hold and which you believe you may be entitled to;
iii. (where we have not complied with timelines for responding to your request and there is no good reason for us to have applied an extension;
iv. where we have either withheld or redacted relevant information from disclosure and you disagree with our decision and reasons for this.

8.4 We will carry out a review of how we have handled your request (an "internal review") and aim to respond to your complaint within 30 calendar days of receipt. It may be necessary in exceptional circumstances to extend the timeline for a response – if this is necessary we will let you know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

8.5 If you are not happy with our response to your review request, you are able to escalate your complaint directly to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme.

8.6 The Ombudsman's complaints scheme is available at [website details to be entered once HO publishes STAIRs complaints scheme]. Any complaint to the Ombudsman should generally be made within 3 months of the outcome of your review. Only matters relating to STAIRs (i.e. the publication of information under Chapter 1 or information requests under Chapter 2) can be addressed as part of a STAIRs review process and then by complaint to the Housing Ombudsman.

8.7 Please note that if your concern relates to an alleged breach of data protection legislation you should inform us that your issue concerns a data protection complaint, which would then be dealt with via our usual complaints process for data protection matters.

9. Data Protection and Security

9.1 Data protection laws are directly applicable to housing providers. This means that where any information requested amounts to personal data, or may not be identifiable personal data in isolation but could amount to identifiable personal data when combined with other information, this information may be withheld from disclosure in compliance with data protection laws.

9.2 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.

9.3 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 [please enter details of your DSAR policy here]. For further information as to how we handle your personal data, please see our Privacy Policy [enter website address for your organisation's privacy policy].

10. Responsibilities

Overall responsibility for this policy lies with the Chief Executive. Day to day implementation of this policy lies with the Housing Manager. All staff are required to familiarise themselves with the wording and obligations listed under this policy.

11. Monitoring and Review

This policy and the STAIRs scheme will be reviewed regularly to ensure accuracy and compliance. Audits and reporting to Board of the scheme will be carried out on an annual basis.

12. Equality Impact Assessment

This policy promotes equality by giving all tenants equal access to social housing information. No adverse impact was identified for protected groups.

13. Related Documents

- Appendix 1: Publication Scheme
- Appendix 2: Responding to Information Requests
- HYELM Complaints Policy
- HYELM Privacy Policy
- HYELM Data Protection Policy

Version Control Table

Status (draft/ approved)	**Version #**	**Date**	**Amendments**
Approved	1	Sept 2026	New Policy