

## Social Tenant Access to Information Requirements Policy

---

### **Introduction**

Harborne Parish Lands Charity (HPLC) is committed to being open about how we manage our almshouses and use our resources. This policy explains what housing information we publish, how residents can obtain information, when information may be withheld, and how to challenge a decision. Asking for information or requesting a review will not adversely affect how we treat you or the services you receive.



### **Purpose and Scope**

HPLC is an almshouse charity and a private registered provider of social housing in England. Our residents occupy their homes under licences. The Social Tenant Access to Information Requirements (STAIRs) include licensees within the definition of tenants. Holding a licence does not exclude you from STAIRs.

This policy applies to information about the management of HPLC's social housing, including information held by organisations or people managing that housing on our behalf. It does not extend the formal STAIRs right to unrelated charitable activities, grant applicants or other members of the public. Published information can be accessed by anyone. We will help people identify other appropriate routes where STAIRs does not apply.

The policy gives effect to the government's STAIRs policy statement, the revised Transparency, Influence and Accountability Standard, and the Housing Ombudsman's STAIRs guidance and Scheme. It supports residents' ability to understand our services, scrutinise performance and influence decisions. It complements our wider regulatory duties rather than replacing them.



### **When the Requirements Apply**

From 1st October 2026: proactive publication and the review procedure for concerns about the publication scheme apply.

From 1st April 2027: the formal individual information request procedure and reviews of those requests apply.

## Social Tenant Access to Information Requirements Policy

---

Before 1st April 2027, we will continue to help residents obtain information and aim to fulfil requests wherever practicable. This does not bring forward the commencement of the formal Chapter 2 request procedure. Existing rights under data protection law or other legislation continue to apply throughout.



### **Responsibility and Fair Handling**

The Head of Operations will coordinate the publication scheme, recognises and logs requests, obtains information, makes and records initial disclosure decisions, maintains records and prepares Board reports.

All staff must pass requests and publication concerns promptly to the Head of Operations. HPLC will provide suitable cover, resources and training.

The Chief Executive is the author and owner of this policy, is accountable for its implementation and normally handles reviews. A reviewer must not have participated in the original decision and must be free of actual or perceived conflicts of interest.

The Board will oversee compliance, performance, risks and learning and to this end STAIRs reporting will become a standard agenda item on the board agenda.



### **Publication Scheme**

We will proactively publish information we hold within the seven classes below, subject to lawful and reasonable redaction or withholding. The examples describe the kinds of information covered; they do not imply that every listed record exists or that every document can be published without redaction.

| Information class              | Information covered                                                   | Specific Documents Published                                                                                                       |
|--------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Governance and decision making | Senior staff names and roles; organisational structure and governance | <ul style="list-style-type: none"><li>• Organisation Roles and responsibility Contact Sheet</li><li>• Organisation Chart</li></ul> |

Document No:

Author: Steven Simpson, Chief Executive

This Policy was prepared with assistance of Artificial Intelligence

Page No. 2 of 14

Publication Date: ~~21<sup>st</sup>~~ October 2026

Review Date: December 2026

## Social Tenant Access to Information Requirements Policy

|                          |                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                          |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                          | arrangements; decision-making processes and policies; complaints prioritisation; resident consultation methods; resident meeting agendas and minutes.                                                                                                  | <ul style="list-style-type: none"> <li>• Consultation Meeting Minutes</li> </ul>                                                                                                                                         |
| Spending                 | Spending and grants related to social housing; how income and service charge revenue are used; relevant financial reports; management costs and staff remuneration, with the equivalent position explained for our charitable governance arrangements. | <ul style="list-style-type: none"> <li>• Annual Service charge breakdown summaries by scheme</li> <li>• Annual Report and Financial Statements</li> </ul>                                                                |
| Housing stock management | Housing plans; repairs and maintenance programmes; information on maintenance work; progress towards net zero; proposed or completed stock transfers.                                                                                                  | <ul style="list-style-type: none"> <li>• Stock Condition Reports</li> </ul>                                                                                                                                              |
| Performance              | Inspection outcomes and regulatory ratings; performance reviews and evaluations; Tenant Satisfaction Measures; complaint metrics and information request data; health and safety performance and assessments; maintenance performance; eviction        | <ul style="list-style-type: none"> <li>• Any regulatory inspection reports</li> <li>• Our responses to any Regulatory reports</li> <li>• Satisfaction reports</li> <li>• Annual Complaints Performance Report</li> </ul> |

## Social Tenant Access to Information Requirements Policy

|                           |                                                                                                                                                                                                |                                                                                                                                                                                                               |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | numbers; relevant media releases.                                                                                                                                                              |                                                                                                                                                                                                               |
| Housing services          | Services residents can access; how to use them; expected service standards; advice and guidance; responsibilities for homes and communal areas; relevant information on accommodation charges. | <ul style="list-style-type: none"> <li>• Resident Handbook</li> </ul>                                                                                                                                         |
| Lists and registers       | Information held in legally required registers and other lists and registers relevant to social housing management, with protected information removed where appropriate.                      | <ul style="list-style-type: none"> <li>• Asbestos Registers</li> <li>• Annual Health and Safety Inspection Reports</li> </ul>                                                                                 |
| Social housing management | Policies and strategies for managing our social housing, including this policy, complaints, allocations, repairs, safety, anti-social behaviour and relevant decision or appeal processes.     | <ul style="list-style-type: none"> <li>• Allocations Policy</li> <li>• Unpopulated Licence Agreement</li> <li>• Complaints Policy</li> <li>• Antisocial Behaviour Policy</li> <li>• Repairs Policy</li> </ul> |



### Finding published information

We will establish a dedicated STAIRs section and move the publication scheme there, keeping the route clear from the Almshouses page. Moving documents must not interrupt residents' access to information.

Document No:

Author: Steven Simpson, Chief Executive

This Policy was prepared with assistance of Artificial Intelligence

Page No. 4 of 14

Publication Date: ~~21<sup>st</sup>~~ October 2026

Review Date: December 2026

## Social Tenant Access to Information Requirements Policy

---

We will explain the scheme and how to obtain information through the resident handbook, residential scheme noticeboards and staff assistance. Paper copies and accessible formats are available free of charge. We do not require residents to use the internet.

The Head of Operations will check the scheme at least quarterly and arrange prompt updates following material changes. We will check completeness, accuracy, accessibility and links, and record gaps and actions. A quarterly check does not justify delaying a necessary update. STAIRs does not require us to create records solely to populate the scheme; other statutory or regulatory record-keeping duties still apply.



### **How to request information**

From 1st April 2027, a current HPLC social housing resident, or their nominated representative, may make a formal STAIRs information request. You must be identifiable and the request must be in writing, but you do not need to mention STAIRs, give a reason, or use a particular form.

Tell us what information you want and how we can contact you.

Email: [info@hplc.org.uk](mailto:info@hplc.org.uk)

Post: HPLC, Hollingworth House, 109 Court Oak Road, Harborne, Birmingham, B17 9AA.

Help in person: speak to any member of staff, with a private discussion available.

Help by telephone: 0121 426 1600.

If you ask verbally, staff will help put your request in writing and confirm the wording with you. We will record receipt of the written request promptly. If the request is unclear, we will work with you to clarify it and record the correspondence; we will not impose an automatic restart or suspension of the response clock.



### **Support and reasonable adjustments**

We will make reasonable adjustments in accordance with the Equality Act 2010, including large print, interpreting, help with writing, an accessible meeting place and suitable communication methods. The Head of Operations will record agreed adjustments, ensures

## Social Tenant Access to Information Requirements Policy

---

relevant staff apply them and keep them under review. Relevant information will be shared only where needed to support you or handle the request.

You may nominate someone to act for you. Tell us who they are and the authority you give them; we will seek proportionate confirmation rather than unnecessary identity documents. Where a person cannot authorise a representative, we will check any legitimate legal authority to act. We will disclose information in a reasonably accessible format and provide ordinary paper copies and accessible formats free of charge.



### **What information you can request**

Requests can cover existing information about the management of our social housing, including repairs, property conditions, charges, occupancy rights, communal areas, estate management, anti-social behaviour, staffing and training, complaints, compensation, safety, privacy, security, energy efficiency and stock transfers. Information held by a contractor or managing agent on our behalf may also be covered.

STAIRs does not require us to create new records, answer hypothetical questions or supply information created after we received your request. Where information is not held by us and is not our information, we will explain this to you and guide you to other relevant sources, where we know of them.

### **Other information and service routes**

Where a statutory right of access applies, we will make reasonable efforts to direct you to that route. A request for your own personal data will normally be handled as a subject access request under data protection law. Other statutory access rights, including any applicable rights to charges or service charge information, remain available. We will explain the applicable process and referral body; data protection concerns may be referred to the Information Commissioner's Office at [ico.org.uk](http://ico.org.uk).

STAIRs does not make HPLC a public authority subject to the Freedom of Information Act. It does require us to have regard to relevant legal protections when assessing disclosure. A repair report or request for action goes to the appropriate service. If correspondence

## Social Tenant Access to Information Requirements Policy

---

includes different kinds of request, we will identify and coordinate the routes and explain them to you.



### Processing and responding to requests

The Head of Operations will record the request and receipt date, acknowledge it promptly, confirm our understanding and identify a named contact and response deadline. We will make proportionate checks of resident or representative status and provide assistance where clarification is needed.

We will search relevant records and record the sources checked. Where information is held by a person or body managing our social housing on our behalf, we will use all reasonable endeavours to obtain it. We remain responsible for the response; you do not have to pursue the contractor separately. Our arrangements with providers must support access to relevant records.

We will respond promptly and no later than **30 calendar days from receipt**. Calendar days include weekends and bank holidays. An extension is permitted only in exceptional circumstances to consider whether withholding is reasonable, or to obtain relevant information held by a person or body managing our social housing on our behalf. We will respond within a reasonable further period.

If a response will be delayed, we will tell you the specific reason and expected response date before the normal deadline, explain how to request a review, and keep you informed of progress. Workload or routine staff absence is not treated as an automatic basis for extension. We will not use a standard extension as part of every request.

The response will provide the information in a reasonably accessible format, or explain precisely how to obtain an accessible published copy. It will identify information not held or outside scope, explain any refusal or redaction, and tell you how to request a STAIRs review.

We will disclose the parts we can rather than withholding an entire document where reasonable redaction would suffice.

## Social Tenant Access to Information Requirements Policy

---



### **Our approach to withholding information**

We will start from a commitment to disclosure. The Head of Operations will make and record the initial decision, seeking specialist advice where needed. We will never disclose information where doing so would conflict with a statutory provision. We will have due regard to the protections and definitions in the Freedom of Information Act 2000, data protection legislation and other relevant law; these protections are not applied as blanket exemptions.

Relevant protections may include personal information and safeguarding records, information subject to an enforceable duty of confidence, legally privileged advice, commercial interests, security, and information whose disclosure could endanger health or safety. A confidentiality label, a third-party objection or a broad assertion of commercial sensitivity is not by itself sufficient justification for withholding.

For each proposed withholding or redaction, we will identify the information and relevant legal protection, consider the actual circumstances, and balance the benefits of openness and resident scrutiny against the likelihood and seriousness of harm. Where disclosure is legally prohibited, we will explain that restriction as far as we lawfully can. We will consider whether partial disclosure, anonymisation or another accessible form would address the concern.

If information was provided by, or relates to, a third party we will consider their views about the likelihood of harm and record how those views affected the assessment. HPLC makes the final decision; consultation does not give the third party a veto. We will record the evidence, balancing exercise, the decision maker and reasons, and explain the decision without revealing the protected information.

We will not withhold information because of your identity beyond establishing eligibility, your reasons for asking, your intended use of the information, or reputational risk to HPLC. We will not destroy, manipulate or alter requested information with the intention of preventing disclosure.



## Social Tenant Access to Information Requirements Policy

---

### **Other grounds for refusing a request**

The government policy statement permits refusal on the following grounds:-

- We assess each request fairly, record the evidence and reasons, and offer assistance or partial disclosure where appropriate.
- We cannot establish the applicant's identity or eligible status after proportionate checks and assistance.
- The meaning of the request remains unclear despite reasonable efforts to help clarify it.
- The information is outside the STAIRs definition of relevant information, including where a statutory access route applies or the information was created after receipt.
- Responding would exceed 18 hours of staff time. We will record a reasonable estimate and the work involved, explain it and offer help to narrow the request.
- The request is repeated, including coordinated repeated requests from multiple applicants. We will consider what was previously requested and supplied, whether information has changed, and the circumstances. Several legitimate requests are not automatically repeated requests.
- The request is offensive or communicated abusively. We will distinguish abuse from criticism, persistence or distress, consider reasonable adjustments, and offer an appropriate way to submit a legitimate request where practicable.

These grounds do not remove our obligations to publish information or respond fairly to legitimate new requests. Contact restrictions must be proportionate and must not prevent access to this process. We will explain any refusal and the right to a review.



### **Our separate STAIRs review procedure**

You can ask for a review if you believe information required by the publication scheme has not been published, or, from 1st April 2027, if you are dissatisfied with the handling or outcome of an individual information request. This includes delay, refusal, redaction or difficulty accessing information. You may use any contact route above; staff can help explain and record your concerns. You do not have to use a particular form or the word review.

## Social Tenant Access to Information Requirements Policy

---

This is a single STAIRs review, separate from the two-stage complaints process. The statutory Complaint Handling Code does not apply to it. We do not require you to complete Stage 1 and Stage 2 of the ordinary complaints process before approaching the Ombudsman about a STAIRs matter.

We will acknowledge the review request promptly, record its receipt date, clarify the issues where needed and identify the reviewer. The Chief Executive normally carries out the review. If they participated in the original decision, are the subject of the concern or are conflicted, the Chair appoints a suitably qualified unconflicted trustee or independent reviewer. If the Chair is conflicted, another unconflicted trustee arranges the appointment.

The reviewer will examine the request or publication concern, relevant records and searches, grounds for refusal, disclosure and harm assessment, third-party views, adjustments, communication and timescales. They may uphold, change or reverse the decision and identify any publication or service improvements needed.

We will normally complete the review within 30 calendar days of receipt. Where additional time is needed in particular circumstances, we will explain why, give an expected response date and keep you updated. Additional time will only be requested if we feel it is reasonable and will not be treated as automatic. The final written response explains the issues, evidence, decision and reasons, any information to be released or published, remedial actions and completion dates, and the right to refer the matter to the Housing Ombudsman. There is no further internal STAIRs appeal stage.



### **Access to the Housing Ombudsman**

If you remain dissatisfied following our STAIRs review, you can refer an eligible complaint directly to the Housing Ombudsman. If we do not respond to your review within 30 calendar days, or there are other review-handling failures, you can contact the Ombudsman; they will decide whether our review procedure should be treated as exhausted. An extension does not remove that ability to seek help.

If you wish to raise a review with us, please do so promptly, normally within three months of becoming aware of the issue. The Ombudsman normally expects a referral within three

## Social Tenant Access to Information Requirements Policy

---

months of our final STAIRs review response. These are the scheme's normal timeframes, not automatic blanket exclusions by HPLC. Where there is no review response, contact the Ombudsman promptly after the expected response period. They will decide eligibility, jurisdiction and whether to consider a late referral.

Former residents may continue to pursue an eligible STAIRs matter where they made the information request or review request while still a resident. Authorised representatives may act on their behalf, subject to the Ombudsman's Scheme. The Ombudsman also has provisions for representatives with legitimate authority where a person lacks capacity or has passed away.

Website and contact information: <https://www.housing-ombudsman.org.uk/contact-us/>  
Online complaint form: <https://www.housing-ombudsman.org.uk/online-complaint-form/>  
Telephone: 0300 111 3000. Live chat is available through its website during published opening hours.

Post: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET.

Please note The Ombudsman does not accept new case enquiries by email. For an existing case, use the instructions it provides.

We will give referral details in our final review response to you. We will cooperate with investigations, supply requested evidence and comply with orders within the timescales set, providing evidence of compliance.



### **Related service complaints and putting things right**

A complaint about an underlying housing service, such as a repair failure, is handled under our compliments, comments and complaints policy. A STAIRs concern about obtaining the relevant records is handled under this policy. Where both arise, we coordinate the work, explain the separate processes and continue necessary service action. The Ombudsman decides which part of its Scheme applies to each element.

If we have made a mistake, we acknowledge it, explain what happened and apologise. Remedies may include releasing or publishing information, correcting a response or record,

## Social Tenant Access to Information Requirements Policy

---

reconsidering a decision, improving accessibility, reviewing procedures or staff training. We will consider the impact of the failure and relevant Ombudsman guidance, including whether a financial remedy is appropriate under HPLC's financial delegations. Agreed actions will be recorded and tracked to completion.



### **Records and confidentiality**

We will maintain complete records of publication checks, requests, receipt dates, acknowledgements, searches, information obtained, third-party consultation, time estimates, disclosure and harm assessments, refusals and redactions, adjustments, reviews, decisions, remedies and Ombudsman correspondence. We will retain evidence of the information considered and the reasons for our decisions.

Records will be held securely, with access limited to those who need them. We use HPLC's applicable retention arrangements and data protection requirements, preserving records needed for a live request, review, Ombudsman investigation or other legal obligation. Published reports avoid unnecessary personal information.



### **Learning reporting and Board oversight**

The Head of Operations will review requests, reviews and publication gaps to identify wider issues. We will use the findings to improve published information, record keeping, staff training, accessibility and service communication. We will share relevant learning and improvements with residents and their panels, staff and trustees, without disclosing protected information.

The Board meets four times a year, normally quarterly, and will receive a STAIRs report at every scheduled meeting. This may sit within the same Board paper as complaints, but STAIRs requests and reviews are reported distinctly. A nil return is reported where appropriate.

The Chief Executive will escalate serious risks promptly rather than waiting for the next meeting.

## Social Tenant Access to Information Requirements Policy

---

The following are standing headings for the quarterly STAIRs report:

- Publication scheme compliance: coverage of all seven classes, accessibility, quarterly checks, material updates, gaps and overdue actions.
- Information requests: numbers, themes, outcomes and response times; before April 2027, voluntary assistance is identified separately from formal Chapter 2 requests.
- Refusals and redactions: grounds used, disclosure and harm assessments, 18-hour estimates, partial disclosures and recurring issues.
- Extensions and delays: reasons, expected response dates, outstanding cases and action to prevent recurrence.
- STAIRs reviews: publication concerns and individual request reviews, timeliness, outcomes, overturned decisions and remedies.
- Housing Ombudsman: referrals, findings, orders, recommendations, deadlines and evidence of compliance.
- Resident access and learning: reasonable adjustments, representatives, barriers, feedback, improvements and communication with residents.
- Risks and action plan: responsible owners, target dates, overdue items and any decisions required from the Board.

The Chief Executive will assess material non-compliance or potential non-compliance with consumer standards and ensure timely communication with the Regulator of Social Housing as required by the revised Transparency, Influence and Accountability Standard.



### **Policy review and related documents**

The Chief Executive will review this policy at least annually and quarterly in the first instance until its operation has been embedded or sooner where requirements, guidance or HPLC's arrangements change. The Board will approve the policy and material revisions. We will keep the published policy current and consider residents' views and accessibility needs when reviewing its operation. The approval date will be recorded following Board approval.

Read alongside HPLC's compliments, comments and complaints policy, persistent or unreasonable complaints and unacceptable behaviour policy, relevant privacy and data

---

Document No:

Author: Steven Simpson, Chief Executive

This Policy was prepared with assistance of  
Artificial Intelligence

Page No. 13 of 14

Publication Date: ~~21<sup>st</sup>~~ October 2026

Review Date: December 2026

## Social Tenant Access to Information Requirements Policy

---

protection information, record retention arrangements, and published housing policies. These documents do not add extra stages to a STAIRs review.



### Sources and regulatory basis

- Government STAIRs policy statement dated 30 September 2025: Chapter 1, Chapter 2 and appendices. <https://www.gov.uk/government/consultations/social-tenant-access-to-information-requirements-consultation/outcome/social-tenant-access-to-information-requirements-policy-statement>
- Regulator of Social Housing Transparency, Influence and Accountability Standard effective 1 October 2026: particularly paragraphs 1.7.1, 2.1, 2.3, 2.4 and 2.6.1. <https://www.gov.uk/government/publications/transparency-influence-and-accountability-standard>
- Housing Ombudsman STAIRs landlord expectations and Housing Ombudsman Scheme effective 1 October 2026, particularly Parts 2B and 2C. <https://www.housing-ombudsman.org.uk/centre-for-learning/key-topics/social-tenant-access-to-information-requirements-stairs/landlord-expectations/>  
<https://www.housing-ombudsman.org.uk/landlords-info/the-housing-ombudsman-scheme/>



**End of Document**

