The Whiteley Homes Trust

Social Tenant Access to Information (STAIRs) Policy

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EIA	Yes

Review Tracker

Review Date	Reviewed by	Changes Made	Approved by	Approved date	Version
July 2026	**RECC**	**New policy to set out our commitment to provide residents with access to information related to the management of the homes, estate and services managed by The Whiteley Homes Trust.**	**RECC** **Main Board**	**6/8/26** **15/9/26**	**1.0**

Introduction

The Whiteley Homes Trust ("the Trust") is committed to operating with openness, transparency and accountability in the delivery of housing services. As a Registered Provider of Social Housing, the Trust complies with the Social Tenant Access to Information Requirements (STAIRs). This policy explains how residents can access information through the Trust's Publication Scheme and by making information requests, whilst ensuring confidential and personal information is appropriately protected.

This policy explains how the Trust will:

- Proactively publish information through a formal Publication Scheme
- Respond to requests for information from residents and their authorised representatives
- Ensure requests are handled fairly, consistently and within the required timescales
- Protect confidential and personal information where disclosure would be inappropriate
- Promote a culture of openness while maintaining appropriate safeguards

The Trust recognises that transparency is fundamental to good governance and excellent customer service. Unless there is a lawful or reasonable basis for withholding information, the Trust will adopt a presumption in favour of disclosure.

Scope of Applicability

This policy applies to all social housing owned or managed by The Whiteley Homes Trust and applies to everyone involved in delivering housing services on behalf of the Trust.

It applies to:

- Employees
- Agency workers
- Bank workers
- Volunteers
- Trustees
- Consultants
- Contractors and subcontractors
- Suppliers providing housing management services
- Professional advisors
- Anyone acting on behalf of the Trust

Throughout this policy these groups are collectively referred to as employees unless otherwise stated. This policy also applies to:

- Beneficiaries occupying the Trust's social housing
- Members of their households where appropriate
- Authorised representatives acting on behalf of a resident

For the purposes of this policy these groups are collectively referred to as residents.

This policy **does not** apply to residents living in market rented homes

This policy applies to:

- Information proactively published by the Trust
- Requests for information relating to the management of the Trust's social housing
- Internal reviews of decisions made under STAIRs
- Complaints relating to compliance with STAIRs

This policy does not replace or restrict rights that individuals may have under:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Safeguarding legislation
- Contractual rights
- Court procedures
- Any other statutory right of access to information

Purpose

The purpose of this policy is to ensure that residents can easily access information about the management of their homes and the services provided by The Whiteley Homes Trust in accordance with the Social Tenant Access to Information Requirements (STAIRs). This policy aims to ensure that:

- Residents can access information that helps them understand how the Trust manages its homes and services
- Information is published proactively wherever appropriate through the Trust's Publication Scheme
- Requests for information are handled fairly, consistently and within the required timescales
- Information is provided in accessible formats wherever reasonably practicable
- Confidential and personal information is protected appropriately
- The Trust complies with all relevant legislative, regulatory and governance requirements

Regulatory Framework

This policy has been developed in accordance with:

- The Social Tenant Access to Information Requirements (STAIRs)
- The Transparency, Influence and Accountability Consumer Standard issued by the Regulator of Social Housing
- The Direction issued by the Ministry of Housing, Communities and Local Government requiring Registered Providers to comply with STAIRs
- The Housing Ombudsman Complaint Handling Code
- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Equality Act 2010
- Other relevant legislation and regulatory guidance.

The STAIRs framework introduces two complementary requirements.

Publication Scheme

From 1st October 2026 the Trust is required to maintain and publish a Publication Scheme setting out categories of information that residents can access without making a specific request. The Publication Scheme supports openness by ensuring information is routinely available wherever appropriate on its website.

Information Requests

From 1st April 2027 residents and their authorised representatives may request information relating to the management of the Trust's social housing.

The Trust will consider each request individually and will provide the requested information unless there is a lawful or reasonable basis for withholding or redacting it. The Trust will not refuse to disclose information simply because publication may be inconvenient, attract criticism or generate adverse publicity.

Principles

Transparency – The Trust will:

- Proactively publish information wherever appropriate
- Make information easy to locate and understand
- Keep published information under regular review

Accountability – The Trust will:

- Provide information that helps residents understand how decisions are made and services are delivered
- Support appropriate resident scrutiny of its performance
- Demonstrate compliance with regulatory requirements

Openness - The Trust will:

- Adopt a presumption in favour of disclosure unless there is a lawful or reasonable basis for withholding information;
- Explain decisions to withhold or redact information; and
- Ensure disclosure decisions are fair, proportionate and evidence based.

Accessibility - The Trust will:

- Provide information in accessible formats wherever reasonably practicable
- Make reasonable adjustments to meet individual needs
- Use clear and accessible language wherever possible

The Trust's website (www.thewhiteleyhomestrust.org.uk) is fully responsive and meets the Web Content Accessibility Guidelines (WCAG). This is the global standard for digital accessibility. It ensures people with visual, hearing, motor, and cognitive disabilities can use and navigate the site.

Fairness - The Trust will:

- Consider each request objectively and on its own merits
- Apply this policy consistently
- Treat all residents fairly and with respect

Continuous Improvement - The Trust will:

- Continually review how information is provided
- Monitor requests and identify emerging themes
- Use learning to improve the publication scheme and information provided to residents
- Review this policy regularly to ensure it remains effective and compliant

Publication Scheme (effective 1st October 2026)

The Trust will maintain and publish a Publication Scheme in accordance with the Social Tenant Access to Information Requirements (STAIRs).

The Publication Scheme will make information routinely available to residents without the need to submit an individual information request. Information will normally be available free of charge through the Trust's website or in another accessible format where reasonably requested.

The Trust will keep the Publication Scheme under regular review to ensure that published information remains accurate, up to date and reflects residents' information needs. Where repeated information requests identify opportunities to improve transparency, the Trust will consider whether additional information should be published proactively.

The Publication Scheme will include information relating to:

- Governance and decision making
- Organisational structure
- Policies and Strategies
- Performance and Service Standards
- Resident engagement and Scrutiny
- Complaints and learning
- Repairs, maintenance and asset management
- Financial information
- Health, safety and compliance
- Procurement and contract management
- Equality, diversity and inclusion
- Regulatory compliance
- Other information required by STAIRs

The detailed Publication Scheme is maintained as a separate document and forms part of the Trust's STAIRs framework. It is available on the Trust's website and will be reviewed regularly to ensure it remains accurate and compliant.

Information Requests (effective 1st April 2027)

Residents, or their authorised representatives, may request recorded information held by the Trust relating to the management of its social housing services.

Residents are not required to explain why they want the information or how they intend to use it. The Trust will normally provide existing recorded information but is not required to create new information in response to a request.

The Trust will seek to resolve routine enquiries through its normal customer service processes wherever appropriate. Where an enquiry meets the definition of a STAIRs information request, it will be managed in accordance with this policy and the Trust's Accessibility of Information Procedure.

Information requests should normally be submitted in writing, including by email, letter or through the Trust's website where available. The Trust will make reasonable adjustments to support residents who require assistance because of disability, language needs or other individual circumstances.

Where a request is unclear or too broad, the Trust will contact the requester to seek clarification. The timescale for responding may be paused until sufficient clarification has been received. The Trust will:

- Acknowledge and respond to requests within the timescales set out in the STAIRs requirements
- Provide the requested information wherever possible
- Explain where information is withheld or redacted and the reasons for doing so
- Advise residents of their right to request an internal review if they are dissatisfied with the response
- Provide information electronically wherever reasonably practicable, or in an alternative accessible format where requested
- Maintain appropriate records of information requests, decisions and outcomes to support monitoring, learning and regulatory assurance

The detailed process for receiving, assessing and responding to information requests is set out in the Trust's **Accessibility of Information** Policy.

The Trust will maintain an internal register of all STAIRs requests to support monitoring, learning and regulatory assurance.

Information That May Be Withheld

The Trust supports openness and transparency and will always begin from a presumption that information should be disclosed.

However, there are circumstances where it would be inappropriate or unlawful to release information. Information may be withheld, in whole or in part, where disclosure would be unreasonable or where disclosure would conflict with legal or regulatory obligations. Examples include where disclosure would:

- Breach data protection legislation
- Identify another individual without lawful authority
- Disclose confidential commercial information
- Prejudice legal proceedings or legal privilege
- Compromise health, safety or security
- Prejudice the prevention or detection of crime
- Reveal information provided in confidence
- Place an individual at risk of harm
- Disclose information protected by another statutory restriction
- Otherwise be unreasonable in accordance with the STAIRs Policy Statement

Where only part of a document is exempt, the Trust will normally redact the exempt information and disclose the remainder wherever possible.

The Trust will explain the reasons for withholding or redacting information unless doing so would itself disclose protected information.

The Trust will never refuse to disclose information simply because publication may:

- Be embarrassing
- Attract criticism
- Generate adverse publicity
- Highlight service failures

Constructive scrutiny supports accountability and continuous improvement and is consistent with the Trust's values.

Responding to Requests

The Trust aims to provide information as quickly as possible and, unless an extension is justified, will respond within **30 calendar days** of receiving a valid request. Responses may include:

- Providing the requested information
- Directing the resident to information already published within the Trust's Publication Scheme
- Providing information in a different accessible format where appropriate
- Partially disclosing information with appropriate redactions
- Refusing the request where there is a lawful or reasonable basis for doing so

Where additional time is genuinely required because of the complexity or volume of the information requested, the Trust may extend the response period. If an extension is required, the Trust will:

- Notify the requester as soon as reasonably practicable
- Explain why additional time is required
- Provide a revised response date
- Ensure that any extension is proportionate and kept to the minimum necessary

Information Outside the Scope of STAIRs

The Trust is not required to create new documents or information solely to answer an information request. STAIRs generally applies to recorded information already held by the Trust relating to the management of its social housing. Examples of information that may fall outside the scope of STAIRs include:

- Draft working documents that have not been finalised
- Duplicate copies of published material
- Personal notes that are not official Trust records
- Information unrelated to the management of social housing
- Personal correspondence not held as part of Trust business
- Information held solely on behalf of another organisation
- Information that the Trust does not hold

Where requested information is not held, the Trust will explain this wherever possible.

Internal Review Process

The Trust is committed to handling requests fairly and consistently. If a resident is dissatisfied with how their request has been handled, they may request an Internal Review. A request for review should normally be submitted within **three months** of the original decision. An Internal Review may consider:

- Whether relevant information has been identified
- Whether published information should have been available
- Whether the request was handled within the required timescales
- Whether any extension was reasonable
- Whether information has been appropriately withheld or redacted
- Whether the information was provided in an accessible format
- Whether this policy has been applied correctly

The Internal Review will normally be undertaken by a manager who was not involved in the original decision wherever reasonably practicable.

The Trust aims to respond to Internal Reviews within **30 calendar days**. Where additional time is required, the resident will be informed of:

- The reason for the delay
- The revised timescale
- When they can expect a final response

The Trust will explain the outcome of the review and the reasons for its decision.

Housing Ombudsman

If the resident remains dissatisfied following completion of the Internal Review, they may refer the matter to the Housing Ombudsman in accordance with the Housing Ombudsman Scheme and the arrangements applying to STAIRs.

The Trust will provide residents with information about how to escalate their complaint where appropriate. Nothing within this policy removes a resident's statutory rights or access to external dispute resolution where available.

Data Protection and Confidentiality

The Trust is committed to protecting personal information while promoting transparency. All information requests will be considered alongside:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Human Rights Act 1998
- Confidentiality obligations
- Any other relevant legislation

Information that identifies an individual will only be disclosed where there is a lawful basis to do so. Where a request relates to the requester's own personal information, the Trust may process the request under its Subject Access Request procedure rather than under STAIRs.

The Trust will ensure that confidential information is handled securely throughout the request process.

Responsibilities

Promoting transparency is everyone's responsibility.

Board of Trustees: The Board of Trustees is responsible for:

- Approving this policy
- Setting the strategic direction for transparency and accountability
- Receiving assurance regarding compliance with stairs;
- Monitoring organisational performance
- Promoting openness and good governance

Chief Executive: The Chief Executive is responsible for:

- Ensuring this policy is implemented throughout the Trust
- Promoting a culture of openness and transparency
- Ensuring adequate resources are available
- Ensuring compliance with regulatory expectations
- Reporting significant themes and risks to the Board where appropriate

Information Governance (IG) Lead (Director of Finance, IT and People): The nominated IG lead working closely with the Head of Marketing and Communications are responsible for:

- Maintaining the Publication Scheme
- Coordinating responses to information requests
- Advising on disclosure and redaction
- Maintaining the STAIRs request register
- Monitoring compliance and reporting trends
- Supporting managers with complex requests
- Ensuring appropriate training is delivered

Leadership Team and Heads of Department: The Leadership Team and Heads of Department are responsible for:

- Oversee operational compliance
- Monitor performance against this policy
- Review trends in information requests
- Identify learning opportunities
- Support continuous improvement

Managers: Managers are responsible for:

- Ensuring employees understand this policy
- Supporting timely responses to requests
- Ensuring appropriate records are maintained
- Promoting proactive publication of information
- Escalating complex requests where necessary

Employees: Employees are expected to:

- Comply with this policy
- Respond promptly to requests referred to them
- Maintain accurate records
- Protect confidential information
- Support openness wherever appropriate
- Seek advice where disclosure is uncertain

Monitoring and Assurance

The Trust will monitor implementation of this policy through regular reporting and performance review. Monitoring may include:

- The number of information requests received
- Response times
- Requests requiring extensions
- Internal reviews
- Housing ombudsman findings
- Themes arising from requests
- Publication scheme updates
- Complaints relating to stairs
- Internal audit findings
- Regulatory feedback

Learning identified through monitoring will be used to improve the Trust's Publication Scheme, information management practices and resident communications.

Monitoring information will be reviewed by the Executive Leadership Team to identify trends and improvement opportunities. The Board will receive annual assurance regarding compliance with this policy and any significant issues arising.

Equality, Diversity and Inclusion

The Trust will implement this policy in accordance with the Equality Act 2010 and make reasonable adjustments where appropriate to ensure residents can access information fairly.

Compliance

Failure by employees or those acting on behalf of the Trust to comply with this policy may result in action under the Trust's policies and procedures. This may include:

- Management action
- Additional training
- Disciplinary action where appropriate
- Contractor performance management
- Other appropriate action depending upon the circumstances

The Trust will always seek to resolve issues fairly, proportionately and in accordance with the principles of natural justice.

Policy Review

This policy will be reviewed at least annually or sooner where:

- Legislation changes
- Regulatory requirements are amended
- Guidance relating to stairs is updated
- Learning from complaints, reviews or audits identifies the need for amendment
- Significant organisational change occurs
- The board of trustees requests an earlier review

The **Information Governance Lead** is responsible for ensuring this policy remains current, effective and aligned with good practice across the social housing sector.

Summary

The Whiteley Homes Trust is committed to openness, transparency and accountability. Through the proactive publication of information and the effective handling of information requests, the Trust will help residents understand how their homes and services are managed while protecting confidential information where disclosure would be inappropriate. This policy supports compliance with STAIRs and reinforces the Trust's commitment to providing accessible, timely and meaningful information.