



Camden Living Housing Association Limited

Social Tenant Access to Information Requirements (STAIRs) Policy

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Policy Owner:	Board
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1. INTRODUCTION

At Camden Living Housing Association Limited (“**CLHA**”), we are committed to the principles of transparency and accountability to all residents. We welcome the new Social Tenant Access to Information Requirements (STAIRs) as introduced by the Regulator of Social Housing.

This policy explains how as landlord we will ensure these new requirements are being met from 1 October 2026.

2. REGULATORY BACKGROUND

This policy has been developed in line with the new requirements set by the government’s policy statement and incorporated into the Regulator of Social Housing’s Transparency, Influence and Accountability Standard, which was introduced as part of the Social Housing Regulation Act 2023. The regulations include the following key requirements.

Phase 1 (Publication Scheme) of the requirements come into force from 1 October 2026. CLHA is required to have carried out an audit to check what information covered by the Scheme which it or it’s Service Provider, the



London Borough of Camden already holds and then proactively publish specified information.

Phase 2 (Information Requests) will be live from 1 April 2027. Under this this requirement, CLHA must ensure that formal written requests for information are provided in line with the new requirements.

Complaints route – CLHA must put in place a process for carrying out an internal review within 30 days where residents are dissatisfied with how CLHA is meeting its obligations under STAIRs. Tenants will be able to escalate cases to the Housing Ombudsman.

Regulatory oversight – the Regulator of Social Housing (RSH) monitors compliance as part of the consumer standards and will take action where it becomes aware that the requirements are not being met.

Staff training – CLHA must train staff so they understand the STAIRs requirements and actions they must take to comply. This will include providing training to staff employed by its Service Provider, London Borough of Camden, where they have contact with or deliver services to CLHA tenants.

3. **LEAD OFFICER**

CLHA's Chief Company Officer has been appointed as the organisation's lead for STAIRs. The Company Secretary will deputise for the Chief Company Officer when required.

4. **WHO IS COVERED BY THIS POLICY?**

CLHA tenants - This policy covers all CLHA tenants (residents). Residents can ask a representative to make requests for information on their behalf or to act on their behalf when requesting a review or making a complaint under this policy.

Camden Living Housing Association - All CLHA staff and Board members and any other CLHA representatives are required to comply with this policy.

Contractors – All contractors delivering management services and any other operational services to residents on behalf of CLHA. This includes but is not limited to CLHA’s service provider, Camden Council.

5. THE PUBLICATION SCHEME

What we will publish

From 1 October 2026, CLHA will proactively publish information held by us (or where relevant, our service provider) where the information falls within one or more of the seven categories in the table below.

The information published will be proportionate to our size, activities and housing stock. We are not required to create new records for the purpose of the publication scheme. Where appropriate and reasonable, we may remove personal data, legally privileged material or other information that it is reasonable to withhold.

Category	Examples of Information Published by CLHA
1. Governance and Decision-Making	- Names, roles and biographies of Board members and senior staff - CLHA’s organisational structure - Governance arrangements, including Board terms of reference where applicable - Decision-making processes and key governance policies - Information explaining how CLHA makes decisions affecting tenants - CLHA’s approach to managing complaints - Information about tenant consultation and involvement, including the methodology used; and tenant meeting agendas and minutes, subject to appropriate redaction.

2. Spending	• Annual report and financial statements • Summary information on CLHA's income and expenditure • Information on grants received and their use • Information on the use of income from residents • Relevant financial information supplied to or published by CLHA that helps residents understand how resources are used to manage and maintain their homes and services.
3. Housing Stock Management	• A summary of CLHA's housing stock, including the number, location and type of homes • Plans and programmes for repairs, planned maintenance, major works and improvements Information on property condition and investment priorities; information on fire, building and other property-safety work where suitable for publication • CLHA's progress towards environmental, energy-efficiency and net-zero objectives where held; • Information about proposed or completed stock transfers.

4. Performance	• Tenant Satisfaction Measure results • Complaint-handling performance, including complaint volumes, response times, outcomes and learning; relevant Housing Ombudsman determinations, orders or reports • Performance reviews and evaluation reports Health-and-safety performance and assessments Repairs and maintenance performance • Number of evictions • Information on STAIRs requests and reviews in an anonymised summary form • Media releases or performance updates issued by CLHA or its service provider.
5. Housing Services	• A clear description of the housing-management services provided • The roles of CLHA and its service provider, the London Borough of Camden • How tenants can access repairs, tenancy, rent, service-charge, complaints, anti-social behaviour and other housing services • Tenant advice and guidance • Contact details, opening arrangements and emergency contact routes • Information about how residents can request reasonable adjustments or information in accessible formats.

6. Lists and Registers	• Information held in registers that CLHA is required by law to maintain and which relates to the management of social housing • Other relevant lists and registers relating to CLHA's social housing management functions
7. Social Housing Management Policies	CLHA's current policies and strategies relating to the management of social housing, including, where applicable: • Allocations and lettings; Tenancy management; • Rent setting and rent collection; Service charges; • Repairs and maintenance; planned investment; Complaints; compensation and redress; • Anti-social behaviour; domestic abuse; safeguarding; • Equality, diversity and inclusion; • Tenant engagement; • Data protection and privacy; • Health and safety; fire safety; damp and mould; Decant and temporary moves; succession; transfers and mutual exchange; • This STAIRs Policy.

How we will make the information available

We will make publication scheme information available:

- On our website, in a clearly signposted dedicated section titled "Tenant Information"
- In hard copy on request, including in accessible formats (large print, alternative languages) or any other reasonable adjustment
- We will make residents aware of the publication scheme through our website, tenant communications, welcome information and through the

housing management services delivered on our behalf by the London Borough of Camden

- Our Chief Company Officer and the Company Secretary will maintain a publication-scheme index showing the information which we hold within each category, the publication location, the owner responsible, the last review date and any applicable redaction. The index and published information will be reviewed regularly, at least annually, and whenever there is a material change to the information held.

Under the STAIRs scheme we are not required to create new records to fulfil our obligations. Where the information is not held, we will record this and keep it under review, including as part of the annual review of the publication scheme.

Where information is sensitive (for example, where it includes personal data or commercially sensitive third-party information), it will be redacted before publication, with a note explaining that a redaction has been made.

Residents will be notified of the publication scheme and how to access it by letter or email when the scheme goes live in October 2026.

6. INFORMATION REQUESTS

The Right to Request Information

From 1 April 2027, a current social housing tenant of CLHA, or a representative identified by that resident, may make a written request for relevant information. A request may be made by letter, email or another written format agreed as a reasonable adjustment. Contact details can be found at the end of this document.

The applicant does not need to make direct reference to STAIRs for this policy to apply. To be valid, the applicant must be identifiable, and the request must be made in writing. Where a communication indicates that information is sought but is unclear, we will make reasonable efforts to assist the applicant to make a clear and valid request.

We will acknowledge a valid request promptly (we will aim to do this within 5 working days). Normally the request will be responded to in full no later than 30 calendar days after receipt.

Where the relevant information is held by another body/person responsible for managing our social housing we will use all reasonable endeavours to obtain the information and fulfil the request. As landlord, we remain accountable to for compliance with STAIRs.

What "Relevant Information" Means

Information is not relevant information for STAIRs purposes where:

- The information is available to the applicant under another statutory right of access, or
- The information was created after we/our service provider received the information request.

Where information is available under another statutory route, such as a subject access request for an individual's own personal data, we will make reasonable efforts to direct the applicant to the appropriate route.

We are not required to create a new record in order to respond to a STAIRs request. We or our service provider must not destroy, manipulate or alter requested information with the intention of preventing disclosure.

"Relevant information" is information that we hold relating to the management of the tenant's social housing. This includes information about:

- Repairs and maintenance relating to the resident's home or communal areas;
- Rent, service charges, and housing benefit
- Anti-social behaviour affecting the resident
- Health and safety matters relevant to the resident's home
- The terms and management of the tenancy
- Any matter relating to the management of CLHA's housing stock that directly affects the resident.

STAIRs do not apply to:

- Information relating to another individual's personal data

- Matters that are the responsibility of the London Borough of Camden, including the housing waiting list rather than of CLHA
- Information that we do not hold and cannot reasonably obtain.

Exemptions — When we may refuse or withhold information

We will fulfil a request for relevant information unless a permitted refusal ground applies. We may refuse a request where:

- it is reasonable to withhold the information from disclosure;
- the identity of the applicant cannot be established;
- the meaning of the request is unclear, after we or our service provider has made reasonable efforts to assist the applicant;
- the information requested is not relevant information;
- responding would exceed 18 hours of staff time;
- the request is repeated, including coordinated repeated requests from multiple applicants; or
- the request is offensive or communicated in an abusive manner.

In deciding whether withholding or redaction is reasonable, we will have due regard to relevant protections in the Freedom of Information Act 2000, the Data Protection Act 2018, UK GDPR and any other relevant legislation. In discussion with our service provider, we will balance the factors favouring disclosure against the likelihood and seriousness of harm that disclosure may cause.

Where information was provided by, or relates to, a third party, we will consider that third party's views about the likelihood of harm before reaching a decision, where this is appropriate and practicable.

We will not refuse or redact information because of the identity of the tenant—other than to establish eligibility—or because of the reason for the request, or how the information may be used. We will not withhold information because disclosure may cause reputational risk to us or our service provider.

We may disclose part of a document and redact only the information that it is reasonable to withhold. Each refusal or redaction will be documented,

including the information requested, decision-maker, rationale, applicable legal considerations and any third-party consultation undertaken.

Delays and extensions

We may take additional time beyond 30 calendar days only in exceptional circumstances where this is reasonably necessary:

- to consider whether it is reasonable to withhold or redact information; or
- to arrange access to relevant information held by a person or body managing social housing services on our behalf.

If additional time is required, the applicant will be notified before the original 30-calendar-day deadline. We will explain the reason for the delay and provide the date by which it expects to respond. We will always respond within a reasonable timeframe.

7. INTERNAL REVIEW PROCESS

When can residents ask for a review?

A resident or their designated representative may ask us for a STAIRs review where they believe:

1. We have not published the information we are required to under the publication scheme
2. We have not properly handled an information request, including where we:
 - Failed to respond to the request
 - Refused to provide some or all of the information requested and the reasons for refusal did not fall into the list of exemptions in Section 6 above
 - Delayed providing the information without good reason or without informing the applicant
 - Redacted information without good reason

The review process

CLHA encourages the applicant to ask for a review within three months of the matter arising.

CLHA will normally complete the review within 30 calendar days of receipt. If more time is required because of the complexity of the matter or the need to obtain information, we will notify the applicant, explain why, and provide a revised response date.

The review will be undertaken by someone not involved in the original decision wherever practicable. This may be an independent member of the CLHA Board. Where this is not practicable, CLHA will document how it has secured an objective review.

CLHA will not reject a review solely because it is made after 30 calendar days where it remains reasonable to consider it.

The review outcome will explain the decision, identify any information disclosed or withheld, and advise the tenant of their right to escalate to the Housing Ombudsman under the Housing Ombudsman Scheme if dissatisfied or if CLHA does not respond.

The Housing Ombudsman may decline to investigate complaints where:

- CLHA's internal review process has not been exhausted
- Cases are referred to it more than three months after CLHA's review process was exhausted
- The original concern was raised with CLHA within a reasonable timeframe (usually more than three months of the issue arising)
- The issue falls within a different legal regime, such as the Information Commissioner's Office
- It considers the matter will be more appropriately dealt with through the legal route, such as the courts and a tribunal
- The matter was pursued by the resident in a way it considers was unacceptable
- The outcome letter will inform the applicant of their right to escalate to the Housing Ombudsman if they remain dissatisfied.

8. RELATIONSHIP WITH OTHER RIGHTS AND PROCESSES

Process	How It Differs from STAIRs
Subject Access Request (SAR under UK GDPR)	A SAR is a right to access personal data held about the individual. STAIRs requests cover management information about social housing. If a request could be either, CLHA will treat it under the most appropriate regime and inform the tenant.
CLHA Complaints Policy	If a tenant is dissatisfied with a service, they should use the Complaints Policy. STAIRs is about access to information, not service complaints.
Housing Ombudsman	The Ombudsman is the escalation route for unresolved STAIRs disputes, in addition to its role in complaints handling.

9. RECORDS AND MONITORING

CLHA will maintain a log of all information requests received, recording:

- Date received and date responded;
- Whether the request was fulfilled, partially fulfilled, or refused (and on what ground);
- Whether an internal review was requested and its outcome; and
- Any Housing Ombudsman referral.

This log will be reviewed by the Chief Company Officer and the Company Secretary and reported to the Board annually, as part of the annual compliance report.

10. TRAINING

All CLHA staff and relevant Service Provider staff with housing management responsibilities will receive training on STAIRs before Phase 2 goes live (April 2027). Training will cover:

- What STAIRs are and how they differ from SARs and complaints;

- How to identify a valid STAIRs request;
- The 30-day response deadline;
- The exemptions framework and when to seek guidance before refusing a request; and
- How to signpost tenants to the publication scheme and internal review process.

11. EQUALITY, DIVERSITY AND INCLUSION

We will ensure that the STAIRs process is accessible to all tenants, including those with disabilities, those for whom English is not a first language, and older or digitally excluded tenants. Information will be provided in alternative formats on request. We will not treat any tenant less favourably in the handling of an information request on the basis of a protected characteristic.

12. REVIEW OF THIS POLICY

This Policy will be reviewed annually and updated to reflect any changes to the RSH's STAIRs requirements, Housing Ombudsman guidance, or CLHA's own organisational context.

13. CONTACT US

Write to us: Camden Living Housing Association, 5 Pancras Square, London, N1C 4AG

Website: www.camdenliving.co.uk

Get in touch via Contact Camden: www.camden.gov.uk/contact-camden