

Social tenant access to information requirements policy

1. Summary

- 1.1. This policy sets out how Shal will comply with the Social Tenant Access to Information Requirements, or “STAIRs”, ensuring transparency, openness and tenant empowerment in being able to hold their landlord to account.
- 1.2. This policy commits Shal to proactively publish the information we hold that falls within the classes of information specified in STAIRs.

2. Scope

- 2.1. This policy applies to all information held by Shal that relates to the management of our social housing services and which falls within STAIRs.
- 2.2. We are committed to openness, transparency, and accountability in the way we manage and deliver our social housing services. In line with the Social Tenant Access to Information Requirements (STAIRs), we will ensure that tenants, their representatives, and other stakeholders have timely and appropriate access to information about our activities, performance, and decision-making.
- 2.3. From 1 October 2026, we will proactively publish, and make routinely available, information we hold which falls within the defined classes of information set out in this policy. This will be delivered through a clearly accessible publication scheme, enabling tenants to easily locate and understand relevant information about their homes, services, and our organisation.
- 2.4. The publication scheme is outlined in appendix 1 of this policy and will also be published on our website at www.shal.org/tenants/stairs.

3. Information requirements

- 3.1. In line with this policy and the STAIRs, from 1st October 2026 we will:
 - 3.1.1. Proactively publish, or make available routinely, information we hold which falls within the classifications outlined in appendix 1.

- 3.1.2. Specify the information we hold that falls within the classifications in appendix 1.
- 3.1.3. Make tenants aware of the publication scheme so that information can be easily identified and accessed.
- 3.1.4. Review and update regularly the information we publish as part of this publication scheme.
- 3.2. From 1st April 2027, we will:
 - 3.2.1. Respond to valid STAIRs information requests no later than 30 calendar days from receipt, except where further time is permitted in exceptional circumstances.
 - 3.2.2. Deal with complaints about any response we have given.
 - 3.2.3. Produce a schedule of fees charged (if any) for access to information made available under STAIRs.

4. Management of the publication scheme

- 4.1. Management of the publication scheme will be the responsibility of the Data & Communications Manager.
- 4.2. The publication scheme will be reviewed annually to ensure the information is accurate and up to date.

5. How we make information available

- 5.1. Much of the information required under STAIRs can be found in our Tenant Handbook and on our website. We aim to ensure this information is accessible for all tenants.
- 5.2. Where information cannot be made available on our website, or tenants do not wish to access information through our website, we will offer alternative routes to access the information wherever possible. This includes making reasonable adjustments to support access and understanding of information.
- 5.3. We are not required to create new information to comply with STAIRs. When considering whether information should be published, we will consider if the information falls within the classes of information outlined in STAIRs.

- 5.4. It may be necessary to redact documents prior to publication, to ensure any information shared is appropriate for disclosure. We will not routinely publish personal data where it would be unreasonable or unfair to do so.

6. Making and responding to requests

- 6.1. Shal will accept requests for information from current tenants and their representatives in line with our responsibilities under STAIRs.
- 6.2. If communication is identifiable as an information request, but the information requested is unclear, we will make reasonable efforts to assist tenants or their representatives to make a clear and actionable request.
- 6.3. Information held by us that is not published under the publication scheme can be requested in writing. These requests will be considered in line with the Freedom of Information Act, Data Protection Act and other relevant legislation.
- 6.4. Requests for information will be responded to within 30 calendar days.
- 6.5. We may refuse an information request where:
 - 6.5.1. It is reasonable to withhold information under Freedom of Information or Data Protection legislation
 - 6.5.2. The identity of the person making the request cannot be established
 - 6.5.3. The meaning of the request is unclear and cannot be clarified
 - 6.5.4. The information does not fall within the STAIRs requirements
 - 6.5.5. The work involved in responding to the request would exceed 18 hours of staff time
 - 6.5.6. It is a repeat request
 - 6.5.7. The request is offensive or communicated in an abusive manner.
- 6.6. If we find it is reasonable to withhold information, we will not refuse a request because of:
 - 6.6.1. The identity of the person making the request
 - 6.6.2. How the information will be used following disclosure.
- 6.7. We will log and review the number of requests received, and our responses to them, to ensure we have the appropriate internal resource to deliver responses

within the designated timescale. We will ensure all staff have a working knowledge of STAIRs and their responsibilities around this.

- 6.8. 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. Where we consider that a request amounts to request for personal data we will process this in line with the Freedom of Information Act, Data Protection Act and other relevant legislation
- 6.9. For further information as to how we handle your personal data, please see our privacy policy at <https://www.shal.org/privacy-policy/>.

7. Review and complaints process

- 7.1. If a tenant considers that Shal has not published information or responded to a request for information appropriately, or is otherwise dissatisfied with the handling of their request, a review can be requested using feedback@shal.org.
- 7.2. A request for a review should generally be made within 3 months of receipt of the original response. The purpose of any review will be to assess:
 - 7.2.1. how we have responded to the request for information (for example, where we may not have provided information in an accessible format)
 - 7.2.2. where we have not published relevant information that we may hold and which a tenant considers they may be entitled to access
 - 7.2.3. where we have not complied with timelines for responding to a request and there is no good reason to have applied an extension
 - 7.2.4. where we have either withheld or redacted relevant information from disclosure and the tenant disagrees with our decision and reasons for this.
- 7.3. We will carry out a review of how we have handled the request and aim to respond 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

communicate this at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

- 7.4. If the tenant is dissatisfied with our response to the review, they have a right to escalate the complaint directly to the Housing Ombudsman. Information about this can be found on the Housing Ombudsman's website: <https://www.housing-ombudsman.org.uk/centre-for-learning/support-guides/stairs/>. Any complaint to the Ombudsman should generally be made within 3 months of the outcome of the review.
- 7.5. 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. Data protection and security

- 8.1. 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. Equality impact assessment summary

- 9.1. This policy promotes equality by giving all tenants equal access to social housing information. No adverse impact was identified for protected groups.
- 9.2. Wherever possible, reasonable adjustments will be made to ensure tenants can request and access information under STAIRs.

10. Responsibilities

- 10.1. Overall responsibility for this policy lies with the Chief Executive, day to day implementation of this policy lies with the Data and Communications Manager. All staff are required to familiarise themselves with the wording and obligations listed under this policy.

11. Version and Revisions

Current version	Date agreed	New review	Owner	Pages
1.0	28/09/2026	Sept 2027	CEO	Page 5 of 8
Crypton House, Bristol Road, Bridgwater, TA6 4SY – Online: www.shal.org – Email: reception@shal.org – Tel: 01278 444344				
SHAL is registered in England and Wales as a Community Benefit Society and an exempt charity (number 27772R).				

11.1. This policy and the STAIRs guidance will be reviewed annually to ensure accuracy and compliance.

11.2. Audits of the scheme will be carried out on an annual basis.

11.3. Revisions

New version	Date	Revision details

Appendix 1 Publication scheme

Class of information	What we publish and where this is available
Governance and decision making Information in this class is published as at the current date. Information relating to tenant consultations and meetings is published for the current and previous two financial years where possible.	• About us ○ https://www.shal.org/about/ ○ Including our purpose, objectives, tenant satisfaction measures, staff satisfaction and merger and growth statement • Our organisation structure ○ https://www.shal.org/about/our-team/ ○ Including our Board, Committee Chairs, Leadership team and tenant-facing staff • Tenant consultation and engagement ○ https://www.shal.org/news/ ○ https://www.shal.org/news/newsletters/ • Our policies ○ https://www.shal.org/tenants/policies/
Finance and spending Information in this class is published for the current and previous two financial years.	• To review and add financial accounts once available.
Housing stock management	• Our corporate plans and strategies ○ https://www.shal.org/wp-content/uploads/2026/05/Corporate-Plan-2026-29-final.pdf ○ https://www.shal.org/wp-content/uploads/2026/09/6.2.2-Asset-Management-strategy-2026-29.pdf
Performance Information in this class is published for the current and previous two financial years.	• Key performance indicators (KPIs) ○ https://www.shal.org/about/our-performance/ • Tenant satisfaction measures (TSMs) ○ https://www.shal.org/wp-content/uploads/2026/05/SHAL-TSM-survey-2025-6-infographic-summary-v2.pdf • Complaints handling ○ https://www.shal.org/tenants/complaints/ ○ https://www.shal.org/wp-content/uploads/2026/07/Self-Assessment-Against-the-Complaint-Handling-Code-1.pdf ○ https://www.shal.org/wp-content/uploads/2026/07/Complaints-report-2025-26-For-website-upload.pdf

	○ https://www.shal.org/tenants/policies/view/complaints-policy/
Housing services and tenant liaison Information in this class is published as at the current date	• Tenant information ○ https://www.shal.org/tenants/ ○ https://www.shal.org/wp-content/uploads/2026/09/RL-11.0-Tenant-Handbook-V3.1.pdf • Advice and support services ○ https://www.shal.org/tenants/advice-support/
Lists and registers Information in this class is published for the current and previous two financial years.	• Will be included in KPI data once published.
Social housing management	• Our policies ○ https://www.shal.org/tenants/policies/