ccha STAIRS Policy

Social Tenant Access to Information Requirements

Policy Aim

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

1.Purpose

This policy sets out how ccha will comply with the government's Policy Statement entitled the Social Resident Access to Information Requirements, or "STAIRs", ensuring transparency, openness and resident empowerment in being able to hold their landlord to account.

2.Scope

The policy applies to all employees of ccha and third parties contracted to provide social housing management services by ccha as the Private Registered Provider. STAIRs cover the publication of information, responding to information requests, and reviews and complaints.

3.Regulatory Framework

The policy is based on the Social Resident 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"). The Ministry for Housing Communities and Local Government ("MHCLG") has issued a Direction to RSH requiring it to introduce a new Consumer Standard enabling residents 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 requirement for PRPs to issue a Publication Scheme (Chapter1), and secondly to respond to information requests from residents and their representatives (Chapter2).

STAIRs is designed to enable residents and their designated representative to be able to access information which supports residents 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 residents.

Chapter 1(requirement to Introduce a Publication Scheme) takes effect from 1 October 2026. Chapter 2 (submission of Information Requests) takes effect from April 2027.

4.Policy Principles

STAIRs take a principles-based approach in line with RSH Consumer Standards. Key principles include transparency, openness, accountability, and resident involvement in how their services are delivered. Under the publication scheme withing Chapter 1 of the Policy Statement providers must proactively publish information which they hold and which fall within one or more of the cases of information set out in Table1 of the publication scheme. 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.

Chapter 2 of STAIRs sets out that residents (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 registered providers' social housing. Providers should proactively response to request 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. 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 disclosure.

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.

5.The Requirements

The STAIRs scheme has two key phases: Chapter 1 Publication Scheme; Chapter 2 Information Requests. Key requirements for each phase are set out in sections (A) and (B) below.

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

a Publication on Scheme (Chapter 1)

A template of a Publication Scheme detailing

(i) What classes of information will be published

(ii) How that information will be published is set out in Annex 1 to this policy.

b Information Requests (Chapter 2)
Our process for handling an information request is set out at Annex 2 to this policy.

ccha will maintain a log of all information requests and timelines for responding to requests for reporting and accountability purposes

6.Out of scope/Withheld Information

ccha is not required to create new information to comply with either the publication scheme or information requests. When considering whether the information should be published, ccha will consider if the information comes within the classes of information set out in Table 1 of the Policy Statement. It may be necessary to redact documents prior to publication.

We have also included in Annex 1 some suggested categories of information which may be out of scope for STAIRs – please note this is not an exhaustive list. When considering an information request under Chapter 2 ccha will consider whether any information may need to be withheld or redacted in response to your request. Any withholding or redaction information must be reasonable and in line with the principles set out in paragraphs 14-16 of the Policy Statement.

Annex 2 to this policy sets out how we will respond to request 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 to our review process set out in section 7.

Advice to residents

7.Review and Complaints Process

If you consider that ccha 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 us to request a STAIRs review. A request should be made within 3 months of receipt of the original decision. A review is not a complaint; 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 forma);
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 for an extension;
IV. Where we have either withheld or redacted relevant information from disclosure and you disagree with our decision and reasons for this.

We will carry out a review of how we have handled your request (an “internal review”) and aim to respond to your complaint withing 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.

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. The Ombudsman’s complaints scheme is available at Online complaint form | Resident complaints | Housing Ombudsman

Any complaint to the Ombudsman should be made within 3 months of your review.

Only matters relating to STAIRs (i.e. Publication of information under Chapter 1 or information requests under Chapter 2) can be addressed as part of a STAIRs review process and them by complaint to the Housing Ombudsman. Please not that if your concern relates to 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 complaints process for data protection matters.

7.Data Protection and Security

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.

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 resident about themselves. Where we consider that your request amounts to request for personal data we will process your request in line with our subject access request policy.

For further information as to how we handle your personal data, please see our privacy policy on our website www.ccha.biz

8.Responsibilities

Overall responsibility for this policy lies with the Company Secretary, day to day responsibility lies with our teams and their managers. All staff are required to familiarise themselves with the wording and obligations listed under this policy.

9.Monitoring and Review

This policy and the STAIRs scheme will be reviewed every 2 years to ensure accuracy and compliance. Audit of the scheme will be carried out on an annual basis

Equality Impact Assessment Summary

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

Version History	
Policy Name	Social Resident Access to Information Requirements STAIRs (Long Policy)
Version Code	1
Lead Officer	Company Secretary
Equality Impact Assessment	All have equal access
Data Protection Impact Assessment	Policy contains no personal data
Date of Issue	September 2026
Review Date	September 2028