

# STAIRs: A Practical Guide for Social Housing Providers



# Social Tenants Access to Information Requirements (STAIRs)

The Social Tenants Access to Information Requirements (STAIRs) establish a new statutory framework aimed at strengthening transparency and accountability across the social housing sector in England. Designed to place tenants at the centre of housing governance, STAIRs introduce clear obligations on providers to make key information accessible, empowering residents to better understand how their homes and communities are managed.

At its core, STAIRs seek to enable tenants to obtain meaningful insight into housing management practices, organisational decision-making, performance outcomes, and financial expenditure. By improving access to this information, the framework supports greater tenant scrutiny and participation, helping to build trust and drive service improvement.

The requirements apply specifically to Private Registered Providers (PRPs) of social housing, ensuring a consistent approach across a significant portion of the sector. The framework draws on principles like those underpinning the Freedom of Information Act (FOIA), while also aligning with wider legal and regulatory obligations, including the UK GDPR and safeguarding responsibilities. Together, these elements ensure that information is shared transparently, but also responsibly and securely.

- **Purpose:** Enable tenants to access information on housing management, decisions, performance, and spending
- **Applies to:** Private Registered Providers (PRPs)
- **Framework:** Similar principles to FOIA, aligned with UK GDPR and safeguarding duties

The STAIRs framework introduces a clear implementation timeline to ensure that social housing providers are prepared to meet their new transparency obligations in a structured and timely manner. These milestones are intended to support a phased approach, allowing organisations to develop systems, processes, and resources ahead of full compliance.



# How TIAA Can Help

TIAA can help the sector prepare for STAIRs by providing fully outsourced Data Protection Officer (DPO) services that ensure transparency requirements are met while maintaining strong data protection and safeguarding controls.

This includes supporting organisations to interpret STAIRs alongside UK GDPR, map and manage information assets, and implement clear governance, redaction, and disclosure processes.

Through a combination of hands-on delivery and independent assurance, TIAA helps embed effective publication schemes and request-handling processes, ensuring they are compliant, practical, and sustainable, giving organisations confidence to meet their obligations while effectively managing risk.

## Key Implementation Dates

- **1 October 2026:** Providers must have their Publication Scheme fully operational, with all required information proactively published and accessible to tenants. This marks the first key step in embedding transparency as standard practice
- **1 April 2027:** providers will be required to formally manage individual information requests in line with STAIRs requirements, including complying with a statutory 30-day response timeframe.

Together, these dates establish a clear pathway for implementation, balancing preparation with accountability.



# Core Obligations

## A. Publication Scheme (Proactive Disclosure)

Under the STAIRs framework, social housing providers are required to implement a Publication Scheme that ensures proactive disclosure of key information in a clear, accessible, and tenant-focused manner. This approach shifts the emphasis from reactive disclosure on request to routine publication, enabling tenants to easily find and understand important information without unnecessary barriers.

The Publication Scheme is structured around seven core categories designed to cover the full breadth of organisational activity. These include:

- Governance & decision-making
- Spending
- Housing stock management
- Performance
- Housing services
- Lists & registers
- Social housing management



By organising information across these areas, providers can present a comprehensive and transparent view of their operations, supporting informed tenant engagement and accountability.

### Key Points:

**Publish what you already hold (no need to create new data)**

**Keep information current, accessible, and clearly signposted**

**Involve tenants in shaping content**

**Use redaction where required (GDPR, safeguarding, commercial sensitivity)**

## B. Information Requests (Reactive Disclosure)

From April 2027, STAIRs introduce formal requirements for handling information requests, marking a shift to a structured system of reactive disclosure. Tenants will be able to request specific information directly from their housing provider, reinforcing transparency where information is not already available through the Publication Scheme.

Requests must be submitted in writing, which can include email, text message, letter, or even social media channels, ensuring accessibility and ease of use for tenants. Providers are required to respond within 30 calendar days, with extensions permitted only in exceptional circumstances where justified.

- Requests must be **in writing** (email, text, letter, social media)
- **30 calendar days** to respond (extensions only in exceptional cases)

Responses must be clear and comprehensive. This includes providing the requested information, or where disclosure is not possible, a clear explanation for withholding it. Providers must also outline the reasons for any redactions or refusals, ensuring decisions are transparent and accountable. In addition, tenants must be informed of their right to request an internal review and, if necessary, escalate concerns to the Housing Ombudsman, reinforcing independent oversight and tenant protection.

### **Key Points:**

#### **Must include**

**Information requested (or explanation if withheld)**

**Reasons for redactions/refusal**

**Right to review and Ombudsman escalation**

## **Request Handling**

Under STAIRs, providers must follow consistent and auditable processes when handling information requests to ensure fairness, transparency, and compliance. Clear procedures help ensure that tenant requests are managed efficiently while maintaining accountability across the organisation.

Requests should be acknowledged promptly, typically within three working days, to confirm receipt and set expectations. All requests must be formally logged, including those received informally or as part of business-as-usual (BAU) interactions, to ensure a complete record and enable monitoring. Where a request is unclear or too broad, providers should seek clarification from the tenant, during which the response timeframe may be paused.

Providers are also expected to undertake reasonable and proportionate searches to locate the requested information. This includes applying an indicative effort limit of around 18 hours, helping to balance transparency with operational practicality. Together, these rules establish a structured, consistent approach to request handling while ensuring tenants' rights to information are upheld.

### **Key Points:**

#### **Process**

**Acknowledge within 3 working days**

**Log all requests (including informal/BAU)**

**Clarify scope if needed (clock pauses)**

**Conduct reasonable searches (limit 18 hours effort)**

#### **Possible Outcomes**

**Full disclosure**

**Partial disclosure (with redactions)**

**Refusal (must justify legally)**

**“Neither confirm nor deny” (in sensitive cases)**

## Grounds for Withholding Information

Under STAIRs, any decision to withhold information must be carefully justified, applying both a reasonableness test and an assessment of potential harm arising from disclosure. This ensures that transparency remains the default position, while recognising that certain types of information require appropriate protection.

Common grounds for withholding information include the protection of personal data, in line with UK GDPR requirements, and the need to mitigate safeguarding or security risks that could place individuals, properties, or communities at risk. Providers may also withhold information where disclosure would undermine commercial sensitivity, breach legal privilege or confidentiality, or prejudice law enforcement activities or ongoing investigations. In addition, requests may be refused where the information is already publicly available or is due to be published soon under the organisation's Publication Scheme.

### Key Points:

**Apply a reasonableness and harm test. Common grounds:**

**Personal data (UK GDPR)**

**Safeguarding / security risks**

**Commercial sensitivity**

**Legal privilege / confidentiality**

**Law enforcement / investigations**

**Information already published or planned for publication**

**In all cases, providers must clearly explain the basis for any refusal or redaction, ensuring that decisions are transparent, proportionate, and open to challenge through review and escalation processes.**

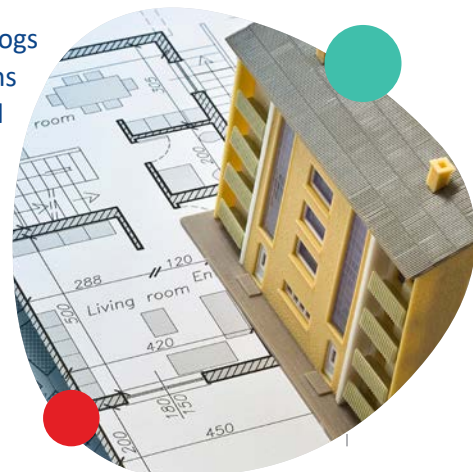
## Governance & Accountability

Effective governance and clear accountability structures are essential to successfully implementing and sustaining STAIRs requirements. Providers should appoint a Senior Responsible Owner (SRO) to lead compliance and provide strategic oversight, ensuring that transparency obligations are embedded at the appropriate level within the organisation.

To support this, a cross-functional working group should be established, bringing together key areas such as Housing, Governance, Data Protection (DPO), IT, and Communications. This collaborative approach ensures that information is managed holistically, balancing transparency with legal, operational, and reputational considerations.

Robust record-keeping is also critical. Providers must maintain disclosure decision logs and comprehensive audit trails, capturing details of searches undertaken, redactions applied, and decisions made. In parallel, management reporting should be developed to monitor performance, including response timeliness, request volumes, and emerging themes, helping to identify risks and opportunities for improvement.

Finally, STAIRs implementation should be aligned with existing frameworks, including complaints handling processes, learning from the Housing Ombudsman, and wider regulatory assurance arrangements. This ensures consistency across governance systems and reinforces a culture of transparency, accountability, and continuous improvement.



**Key Points:**

**Appoint Senior Responsible Owner (SRO)**  
**Establish cross-functional working group (Housing, Governance, DPO, IT, Comms)**  
**Maintain:**  
 Disclosure decision logs  
 Audit trails (searches, redactions, decisions)  
 Management reporting (timeliness, volumes, themes)  
**Align with:**  
 Complaints handling  
 Housing Ombudsman learning  
 Regulatory assurance frameworks

**Implementation Roadmap****Immediate (0–30 days)**

The implementation of STAIRs should begin with a focused set of immediate actions within the first 30 days to establish strong foundations for compliance. Early mobilisation is essential to ensure clear accountability and coordinated delivery across the organisation.

Providers should first assign ownership by appointing a Senior Responsible Owner (SRO) and forming a cross-functional working group. This ensures that leadership, oversight, and operational capability are in place from the outset. At the same time, organisations should undertake a comprehensive mapping of information assets, identifying what information exists, where it is held, and how it is currently managed. This exercise is critical to supporting both proactive publication and efficient response to future requests.

Clear redaction and disclosure principles must also be defined early, aligned with legal obligations such as UK GDPR and safeguarding requirements. Establishing these principles upfront will promote consistency and reduce risk when handling sensitive information. Finally, providers should brief the Board on current readiness levels, key risks, and planned actions, ensuring senior-level awareness and support for the implementation programme.

**Key Points:**

**Assign ownership (SRO + working group)**  
**Map information assets**  
**Define redaction/disclosure principles**  
**Brief Board on readiness & risks**



## 30–60 days

Within the 30–60 day phase, organisations should begin translating planning into visible delivery by establishing a minimum viable Publication Scheme. This initial version does not need to be fully comprehensive but should demonstrate clear progress toward compliance, providing tenants with early access to relevant and useful information.

At this stage, providers should prioritise the publication of high-value, low-risk content, such as governance structures, key policies, and performance summaries that can be shared confidently with minimal need for redaction. This helps to build momentum while reducing early implementation risk.

Alongside publication, it is essential to actively communicate access routes to tenants. Providers should ensure residents are aware of where and how to find published information, as well as how to request additional details if needed. Clear communication supports engagement, encourages uptake, and reinforces the organisation's commitment to transparency from the outset.

### Key Points:

**Launch minimum viable publication scheme**  
**Publish high-value, low-risk content**  
**Communicate access routes to tenants**

## 60–90 days

In the 60–90 day phase, organisations should transition from initial delivery to a more complete and operational model aligned with full STAIRs requirements. This includes expanding the Publication Scheme to cover all seven required categories, ensuring that tenants have access to a comprehensive and coherent set of information across governance, performance, services, and housing management.

At the same time, providers should assign clear information ownership across the organisation. Designating accountable leads for each category or dataset helps ensure accuracy, timeliness, and consistency in both published content and responses to requests. This step is key to embedding responsibility within business functions rather than treating STAIRs as a standalone compliance activity.

Finally, organisations should test and refine their processes through practical exercises such as mock information requests and internal review scenarios. These tests help identify gaps in workflows, clarify roles, and ensure that response timelines, redaction practices, and decision-making processes are effective before statutory obligations formally come into force.

### Key Points:

**Expand to full 7 categories**  
**Assign information owners**  
**Test processes (mock requests & reviews)**

## Ongoing

As part of ongoing compliance, STAIRs requires providers to embed continuous review and improvement into their transparency arrangements. This ensures that both proactive and reactive disclosure processes remain effective, relevant, and aligned with evolving regulatory expectations.

Providers should undertake an annual review of their Publication Scheme to confirm that published information remains accurate, accessible, and complete across all required categories. In parallel, organisations should monitor trends in information requests and associated complaints, using this insight to identify recurring themes, reduce demand through proactive disclosure, and address potential service gaps.

To sustain capability, providers must also refresh staff training and maintain strong governance oversight. This includes reinforcing awareness of disclosure obligations, decision-making principles, and handling procedures, while ensuring that senior leadership continues to review performance, risks, and compliance. Together, these ongoing activities support a culture of transparency, accountability, and continuous improvement.



### Key Points:

- Annual review of publication scheme
- Monitor request trends and complaints
- Refresh training and governance oversight



## Tenant Rights & Escalation

The STAIRs framework places a strong emphasis on empowering tenants by clearly defining their rights to access information and challenge decisions where necessary. These rights are central to promoting transparency, accountability, and meaningful engagement between tenants and their housing providers.

Tenants have the right to request information, which will generally be provided free of charge, ensuring accessibility for all residents. If a tenant is dissatisfied with the response received, they may request an internal review within three months, allowing the provider an opportunity to reconsider its decision. Where concerns remain unresolved, tenants can escalate the matter to the Housing Ombudsman, providing independent oversight and an additional layer of assurance.

In addition to these formal rights, tenants are encouraged to provide feedback on the Publication Scheme, helping providers to improve the accessibility, relevance, and quality of published information over time. This ongoing dialogue supports a more transparent and responsive housing service, driven by tenant needs and experiences.

### Key Points:

**Request information (free of charge in most cases)**

**Request internal review (within 3 months)**

**Escalate to Housing Ombudsman if dissatisfied**

**Provide feedback to improve publication scheme**

## Key Risks to Manage

The implementation of STAIRs introduces several key risks that providers must actively manage to ensure compliance and protect both tenants and the organisation. A primary concern is the risk of data protection breaches, particularly where inadequate redaction could result in the unintended disclosure of personal or sensitive information, in breach of UK GDPR requirements.

There are also important safeguarding considerations, as the release of certain information—such as details of vulnerable individuals, secure locations, or building systems could create safety or security risks. Similarly, providers must be mindful of commercial sensitivity, ensuring that the disclosure of information relating to pricing, contracts, or tender processes does not compromise competitive positioning or contractual obligations.

Operational risks must also be addressed, including the failure to meet statutory response deadlines, which could lead to regulatory scrutiny and reputational damage. In addition, weak or inconsistent audit trails and governance visibility can undermine accountability, making it difficult to evidence compliance or defend decisions if challenged. Effectively managing these risks requires robust processes, clear oversight, and ongoing staff training to support consistent and informed decision-making.

### Key Points:

**Data protection breaches (inadequate redaction)**

**Safeguarding exposure (revealing sensitive locations or systems)**

**Commercial harm (disclosing pricing/tenders)**

**Failure to meet deadlines**

**Poor audit trail or governance visibility**

## Success Factors

Successful implementation of STAIRs relies on a set of critical enablers that ensure both compliance and sustained effectiveness. Early mobilisation is essential, with clear ownership and leadership through an appointed SRO and defined roles, providing direction, accountability, and momentum from the outset.

A strong foundation in data mapping and well-maintained information asset registers is equally important, enabling providers to understand what information they hold and how it can be accessed, managed, and disclosed efficiently. Alongside this, tenant-focused communication ensures that published content is not only available but also accessible, relevant, and easy to understand, supporting meaningful engagement.

Consistency is achieved through clear and well-documented decision-making processes, particularly in relation to disclosure, redaction, and refusals. This reduces risk and ensures fairness across all requests. Finally, embedding STAIRs within integrated governance and assurance frameworks, including reporting, audits, and alignment with existing regulatory requirements helps sustain compliance, strengthen oversight, and promote a culture of transparency and continuous improvement.



### Key Points:

- Early mobilisation and clear ownership
- Strong data mapping and asset registers
- Tenant-focused communication
- Consistent, documented decision-making
- Integrated governance and assurance



## Conclusion

In summary, the STAIRs framework represents a significant step forward in embedding transparency, accountability, and tenant empowerment across the social housing sector. By combining proactive publication requirements with a structured approach to handling information requests, STAIRs moves organisations beyond traditional, reactive disclosure models and towards a more open and tenant-focused culture.

Successful implementation will depend not only on meeting the technical requirements of the framework, but also on establishing strong governance, clear ownership, and consistent processes that are embedded across the organisation. Providers that take an early, structured approach, focusing on data readiness, tenant-centric communication, and robust decision-making will be best positioned to manage risks while realising the wider benefits of increased trust, engagement, and service improvement.

Ultimately, STAIRs should be seen not simply as a compliance exercise, but as an opportunity to strengthen relationships with tenants, enhance organisational transparency, and drive continuous improvement in housing services.



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