

Social Tenants Access to Information Requirements (STAIRs)

Lead Director: Director of Governance and Assurance

Reference: POL 95

SMT Approval: 14/09/2026

Review Date: 14/09/2029

1. Introduction and Aim

1.1 Cobalt is committed to openness, transparency and accountability in how we operate and make decisions. This Policy sets out how we will meet the Regulator of Social Housing's Transparency, Influence and Accountability Standard by ensuring tenants and stakeholders have access to clear, accurate and timely information about our activities and performance.

1.2 The Policy explains how we will proactively publish information, respond to information requests, and balance openness with our legal duties relating to privacy, data protection, commercial confidentiality and safety.

1.3 **Go-live date**

This Policy guides the development and testing of Cobalt's Publication Scheme during 2026/27. Cobalt will formally respond to STAIRS information requests from 1 April 2027, in line with regulatory requirements. Before this date, Cobalt may respond to requests on a discretionary basis, applying the principles of this Policy where appropriate.

1.4 This Policy applies to all colleagues involved in producing, approving or publishing information on behalf of Cobalt.

1.5 **Definition of Relevant Information**

Relevant information means information that falls within the scope of the Regulator of Social Housing's Transparency, Influence and Accountability Standard and Cobalt's Publication Scheme.

1.6 **Social Tenants Access to Information Requirements (STAIRS)**

STAIRS are statutory requirements that give social housing tenants rights to access information about the management of their homes. They are implemented through the Regulator's Transparency, Influence and Accountability Standard. Cobalt will implement STAIRS in line with this Policy and our Publication Scheme.

2. Policy Statement

- 2.1 Cobalt will proactively publish information in line with our Publication Scheme, as required by the Transparency, Influence and Accountability Standard. We will make information accessible unless there is a lawful reason not to disclose it, and we will respond to information requests in a fair, timely and transparent manner.
- 2.2 In developing and operating our Publication Scheme, we will have regard to good practice set out in the National Housing Federation's STAIRS guidance, while ensuring all decisions comply with our legal duties relating to privacy, data protection, commercial confidentiality and safety.
- 2.3 Cobalt will involve tenants in the development, review and improvement of the Publication Scheme, ensuring tenants can influence what we publish and how information is presented.

3. Policy Principles

Our approach to transparency and information handling is based on the following principles:

- 3.1 **Openness by default** – we will publish information unless there is a clear and lawful reason not to.
- 3.2 **Regulatory compliance** – our Publication Scheme and information handling processes will meet the requirements of the Regulator of Social Housing's Consumer Standards.
- 3.3 **Good practice** – we will have regard to sector guidance, including the NHF's STAIRS framework, where it supports stronger transparency and resident trust.
- 3.4 **Fairness and consistency** – disclosure decisions will be made using consistent criteria and recorded appropriately.
- 3.5 **Accessibility** – information will be easy to find, understand and use, with reasonable adjustments made where needed.
- 3.6 **Proportionality** – we will balance transparency with our duties to protect personal data, commercial interests, confidentiality and safety.

- 3.7 **Resident influence** – information will support tenants to understand how we work, how decisions are made, and how they can influence and scrutinise our services.
- 3.8 **Accuracy and accountability** – information we publish will be accurate, up to date and quality-assured.

4. Who Can Request Information

- 4.1 The Publication Scheme is publicly accessible and may be viewed by anyone.

- 4.2 Requests for information that are not included in the Publication Scheme may be made by tenants or an authorised representative acting on their behalf.

4.2 Clarification of legal status

Cobalt is not subject to the Freedom of Information Act 2000. This Policy does not create a general right for the public to access information. Requests under this Policy apply only to tenants or their authorised representatives and relate solely to relevant information.

4.3 Format of requests

Requests must be made in writing (email, letter or an online form) and addressed to: Data Protection and Information Governance Manager, 199 Lower House Lane, Liverpool L11 2SF. Or by email to dataprotection@cobalthousing.org.uk. We will provide reasonable support and adjustments to ensure all tenants can make a STAIRS information request. Staff may assist a tenant to record the request in writing.

- 4.4 Because requests may relate to tenancy-specific or operational information, we will take reasonable steps to verify the identity of the requester and their connection to the tenancy. Verification requirements will be proportionate and aligned with Data Protection and Subject Access Request procedures.

4.5 Out of Scope Information

Information that does not relate to Cobalt's social housing functions is outside the scope of STAIRS and is not subject to disclosure under this Policy. This includes, for example:

- Market-rent properties
- Leasehold properties
- Shared ownership where the resident owns 100% equity
- Service charges not connected to social housing.

5. Exempt Information

5.1 Information may be withheld where disclosure would breach legal obligations or create unacceptable risks, including:

- personal data protected under the Data Protection Act 2018 and UK GDPR
- commercially sensitive or contractual confidential information
- information that could compromise health, safety or security
- legally privileged or confidential legal advice
- information that would prejudice investigations, regulatory processes or enforcement action

5.2 Where only part of the information is exempt, Cobalt will consider partial disclosure with redaction before refusing a request.

5.3 Requests from individuals who are not tenants or authorised representatives may be refused.

5.4 Decisions to withhold information will be made by the Governance and Assurance Team, with advice from the Information Governance and Data Protection Manager where required.

6. Invalid or Unreasonable Requests

6.1 Cobalt may refuse to process a request where:

- the meaning is unclear and clarification is not provided
- the information requested is not relevant information
- the work involved would exceed a reasonable limit (normally 18 hours of staff time)
- the request is repeated or coordinated
- the request is offensive, abusive or breaches the Unacceptable Behaviour Policy
- the identity of the tenant cannot be established

6.2 Where a request is refused, we will explain the reason and advise the requester of their right to request a review.

7. Risk Management

7.1 The key risk associated with non-delivery of this Policy is:

Risk Register Ref:	Risk:
ST08 – Data and Records Management Failure to manage the quality, integrity, security and governance of data resulting in regulatory and data management breaches, legal claims, fines and reputational damage.	Risks include: • Publishing inaccurate or misleading information or whistleblowing processes • Releasing personal or sensitive data • Withholding information without lawful justification • Publishing information that creates safety or security risks • Failure to meet publication scheme requirements
Risk Consequences:	Management and Mitigation:
• Reputational damage, loss of trust, regulatory scrutiny • Data breach, ICO action, harm to individuals • Complaints, challenge, reputational impact • Increased vulnerability of people or assets • Non-compliance with STAIRS	• Quality assurance checks; clear approval routes; version control • Data protection review; redaction processes; DPO oversight • Clear exemption criteria; legal review where required • Risk assessment before publication; consultation with relevant teams • Monitoring of publication schedule; internal audit

7.2 Key Risk Indicators

We will monitor the effectiveness of this Policy through the following indicators:

- Timeliness of responses
- Number and type of exemptions applied
- Compliance with the Publication Schedule
- Accuracy and completeness of published information
- Complaints or appeals
- Internal audit findings
- Tenant satisfaction with transparency

Internal controls include:

- Defined approval routes
- Data protection and legal review
- Redaction procedures
- Regular review of the Publication Scheme
- Colleague training

8. Regulatory & Legislative Compliance

8.1 This Policy supports compliance with:

- Regulator of Social Housing – Consumer Standards
- Housing Ombudsman Complaint Handling Code
- Social Housing (Regulation) Act 20223

8.2 Relevant legislation includes:

- Data Protection Act 2018 and UK GDPR – governing the handling and disclosure of personal data
- Equality Act 2010 – ensuring information is accessible and does not disadvantage protected groups
- Health and Safety at Work etc. Act 1974 – where disclosure may impact safety or security
- Common law duty of confidentiality – protecting confidential information belonging to individuals or third parties
- Contractual and commercial confidentiality obligations – ensuring information is not disclosed where it would prejudice legitimate commercial interests

9. Links to Other Key Documents

- Data Protection Policy
- Whistleblowing Policy
- Unacceptable Behaviour Policy
- Customer Strategy
- Managing STAIRs complaints procedure
- Handling Request for STAIRs Information process

10. Governance of this Policy

10.1 The Governance and Assurance Team leads this Policy, has oversight of the Publication Scheme, oversees information requests and ensures compliance.

10.2 The Information Governance and Data Protection Manager is Cobalt's STAIRs Champion.

10.3 The Board has overall responsibility for ensuring compliance with the Transparency, Influence and Accountability Standard and will receive regular assurance reports.

10.4 **Requests, reviews and complaints**

The Governance and Assurance Team will:

- manage all information requests
- verify identity and tenancy connection
- make or coordinate disclosure decisions
- acknowledge requests within 5 working days and aim to respond within 30 working days
- complete internal reviews within 20 working days
- manage STAIRS complaints within 30 working days, in line with the Housing Ombudsman's dedicated STAIRS review and complaints process.

10.6 **Review cycle**

This Policy will be reviewed every three years, or sooner if required by changes in legislation, regulation or good practice guidance.

Equality Diversity & Inclusion (ED&I)	An Equality Impact Assessment (EQIA) was completed on 20 th August 2026. Information will be published in accessible formats. We understand that not everyone is able to make a STAIRs request in writing, and we will offer appropriate support and reasonable adjustments to ensure tenants who need assistance can complete their request.
Financial and Links to VfM	Proactive publication reduces the need for individual information requests and supports efficient use of resources.
Privacy and Data Protection	All disclosures will comply with data protection legislation. Personal data will only be published where lawful and appropriate.
Health and Safety	Information will not be published where doing so would create a safety or security risk.
Development and Consultation	This Policy was developed and reviewed in consultation with: • Tenants • Senior Leadership Team • Data Protection Lead • Communications team • Relevant operational teams

11. Definitions

- 11.1 **Publication Scheme:** The structured list of information that Cobalt will proactively publish in accordance with the Transparency, Influence and Accountability Standard. It sets out what information is routine available, how it can be accessed, and when it will be updated.
- 11.2 **Relevant Information:** Information that falls within the scope of the Transparency, Influence and Accountability Standard and Cobalt's Publication Scheme. This includes information about governance, performance, safety, services, decision-making and accountability, but excludes personal data and exempt information.
- 11.3 **Information Request:** A written request from a tenant or authorised representative for relevant information that is not already published through the Publication Scheme.
- 11.4 **Exempt Information:** Information that cannot be disclosed because doing so would breach legal obligations or create unacceptable risks, including personal data, commercially sensitive information, legally privileged material, or information that could compromise health, safety, or security.
- 11.5 **Personal Data:** Information relating to an identifiable individual, protected under the Data Protection Act 2018 and UK GDPR.
- 11.6 **Commercially Sensitive Information:** Information that, if disclosed, could prejudice Cobalt's or a third party's commercial interests, or is subject to contractual confidentiality.
- 11.7 **Proactive Publication:** Information that Cobalt routinely publishes without the need for a request, in line with the Publication Scheme and STAIRS requirements.

- 11.8 **Redaction:** The process of removing or obscuring exempt information so that non-exempt information can be disclosed wherever possible.
- 11.9 **Authorised Representative:** A person who has been formally authorised by a tenant to act on their behalf for the purpose of making an information request.
- 11.10 **Resident influence:** The ability for tenants to shape, scrutinise and influence Cobalt's decisions, services and published information, as required by the Transparency, Influence and Accountability Standard.
- 11.11 **Social Tenants Access to Information Requirements (STAIRS):** Statutory requirements that give social housing tenants rights to request information about the management of their homes and require landlords to proactively publish specified information through a publication scheme.

