SOCIAL TENANT ACCESS TO INFORMATION REQUIREMENTS (STAIRS) POLICY

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STAIRS POLICY

DOCUMENTATION MASTER SHEET

Amendments to this Document are Detailed Below.

Version Number	Date Amended	Comments	Date Approved	Author	Approved By
01	n/a	First version	10/09/2026	Iain Turner, Director of Governance Risk and Assurance	ELT
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STAIRS POLICY

OVERALL AIM/INTRODUCTION

This policy aims to ensure that customers can access information from GCH about how we run our social housing management services. The policy sets out how GCH will promote access to information through a formal publication scheme enabling customers and their representatives to access information proactively, and to support customers to make individual information requests.

GCH will comply with the government's Policy Statement entitled the Social Tenant Access to Information Requirements (STAIRs), ensuring transparency, openness and customer empowerment in being able to hold GCH to account.

SCOPE OF POLICY

This policy applies to all employees of GCH. STAIRs involves two key aspects:

1) Publication of key information about social housing management

2) Responding to information requests from customers.

This Policy covers our approach to both aspects and also sets out how we will review information, complaints related to STAIRs and keep staff up to date with training.

Detailed for receiving, assessing and responding to requests will be set out in supporting procedures and guidance.

LEGAL AND REGULATORY EXPECTATIONS

This policy is based on the Social Tenant Access to Information Requirements introduced under the amended Transparency, Influence and Accountability (TI&A) Consumer Standard issued by the Regulator of Social Housing (RSH). It has been informed by the detailed guidance issued by the National Housing Federation (NHF) as good practice.

Under the requirements GCH is expected to ensure transparency regarding our management of social homes by publishing key information and documentation and by facilitating individual information requests from our customers.

SERVICE STANDARDS

GCH is committed to ensuring that information is made available in a way that is as accessible as possible for all our customers. Information available under STAIRs is generally available free of charge. Where information is required in a non-electronic format we will discuss this with the customer to ensure we can best meet their requirements in a reasonable way.

PUBLICATION SCHEME

GCH will publish our adopted STAIRs publication scheme in an easy to access page on our website. This publication scheme will set out all information that we will publish to meet the STAIRs requirements and provide transparency for our customers about how we run our social housing services. It will include the types of information we publish, how to access that information, and how often it is reviewed.

This Scheme will be reviewed on an annual basis or upon any significant changes in our approach or regulation. Information we publish under STAIRs will be updated in accordance with our review periods set out in the publication scheme.

How will relevant information under STAIRs be published?
Information will be available on our website at https://www.gch.co.uk/stairs/. This will be published online, no later than 1 October 2026 and kept under regular review.

Formats other than online
We are committed to making information listed in our Publication Scheme available free of charge online. If information is required to be provided in an accessible alternative format, we also commit to providing a single copy of this information free of charge.

We may charge for printing, postage and packaging, pending the circumstances of the request, individual customer needs and any reasonable adjustments required.

Alternative Formats
If information is requested in an alternative accessible format to support someone with an additional need, we will provide the information free of charge. We will ensure as much information as possible published on our website under STAIRs is compatible with browser read-aloud functionality and standard translation software (i.e. Google Translate).

Customer Feedback on this Publication Scheme
Customers can provide suggestions for improvements to this Scheme via email to dpo@gch.co.uk or speaking to our customer services team.

Feedback will be passed to our Governance Team to consider for any future amends or improvements.

Reviews
Should a customer consider that we have not included information in our publication scheme, they may request a review. This can be done via the routes listed above. We will aim to acknowledge the request within 5 working days and complete a review within 30 days. We will update the customer if we don't expect to meet this timeframe to explain why.

Approving the publication scheme
The GCH STAIRs Publication Scheme will be approved by the Executive Leadership Team. It will be reviewed and approved alongside this policy.

Minor amends will be approved by the Director of Governance, Risk and Assurance. A minor amend is defined as a change that does not materially alter the scope, purpose, commitments or approval framework of the STAIRs Publication Scheme. This might include:

- team names or website locations;
- refreshing publication or review dates;
- clarifying wording without changing its meaning;
- adding, removing or reclassifying information where this does not reduce customer access to information or affect legal or regulatory compliance; and
- making administrative changes required to keep published information accurate.

What we will not publish under our STAIRs publication scheme
GCH 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, we will consider if the information falls within the regulatory requirements of the scheme and would support better transparency for customers. It may be necessary to redact documents prior to publication.

INFORMATION REQUESTS

Customers will be able to make individual information request from 1 April 2027.

Information requests will give registered customers, or a representative acting on their behalf, a formal way to ask GCH for recorded information about how we manage their homes and deliver social housing services. They will complement the information we publish under the Publication Scheme by enabling customers to seek information that is not already readily available.

Their purpose is to promote transparency and accountability, support meaningful customer involvement, and help customer understand and scrutinise the quality of the housing and services we provide.

All colleagues must recognise potential information requests and ensure they are handled promptly, consistently and lawfully in accordance with this policy.

Who can make requests?
Under this policy, any customer can make an information request, as long as they are:

- a tenant
- a shared owner owning less than 100% of the property equity
- or any other person in a landlord-tenant relationship with GCH

GCH will only respond to requests where it can confirm the identity of the requesting customer and their representative (where appointed). There are no restrictions on who a customer may choose as their representative, so long as we are satisfied that they are acting on the customer's behalf. In cases where a signed consent form is not already held, we will verify with the customer that they have provided permission for the requested information to be shared with a representative before any information is disclosed.

Identity checks will be proportionate. The Governance Team will usually comply with a request if it comes from a known email address, the customer passes security with our contact centre or if photo ID can be provided. Any concerns about verifying an individual's identity will be shared with the Director of Governance, Risk and Assurance who will make a final decision. In their absence any other member of ELT may make this decision.

How can customers make a request?
We will accept requests that are made in writing, including either by email, text message and social media, as long as we can verify the identity of the customer (and representative).
We will always make reasonable efforts support customers to make a clear and valid request.
We will support customers who may not be able to make a request in writing themselves. This might include writing the request down for them or signposting them to internal or external support services.

We will advise customers making verbal requests (such as over the phone) on how they can do so in writing.

Where we record a written request based on a customer's verbal instruction we will always ensure that this has been mutually agreed and a record retained on our CRM system.

Information requests do not have to specifically mention "STAIRs" for it to be considered under the scheme, as long as the request is made in writing and we are able to identify the customer.

How long will it take us to respond?
We will provide an acknowledgement to a request within 5 working days of receipt.

We will respond to a request within 30 calendar days from receipt of the request. If the request requires clarification, we will respond within 30 days from receipt of the clarification.

GCH will take reasonable steps to assist customers and their representatives where any request requires clarification.

In exceptional circumstances it may be necessary to extend the timeline for a response. Where this is necessary GCH will inform the customer at the earliest opportunity. If there is likely to be any delay in providing a response, we will ensure that we provide a reason for the delay together with our best estimate as to when the customer may be likely to receive a response.

Obtaining information from third parties
It may be the case that the requested information is held by a third party responsible for the management of social housing on our behalf.

If this is the case GCH will take reasonable steps to obtain the information, taking account of our duty to comply with the requirements balanced against the need for a proportionate approach and the availability of resources.

Format of information provided
We will provide information to customers in a digital format, via a secure file sharing platform unless otherwise asked to do so.

We will provide customers who wish to receive a hard copy of any records, one copy for free. Additional copies will be charged. We may charge for postage and packaging, pending the circumstances of the request, individual customer needs and any reasonable adjustments required.

REFUSING INFORMATION REQUESTS

Key principles for refusals
We may refuse a request if it is unclear, abusive, or repeated.

If completing the request would take more than 18 hours of staff time, we have the right to refuse it, but we will first ask the customer to narrow its focus.

We will always try to share information unless there is a good reason not to, regardless of why the customer is asking for it.

If we withhold or redact information, we will explain why.

We may need to balance the benefits of sharing with any risk of harm, such as risk to safety, confidentiality, or business negotiations.

Additional grounds for refusal
We may also refuse to respond to an information request where:

- Disclosure of the information may cause harm (where we have reasonably balanced the factors favoring disclosure against the likelihood of any harm arising from that disclosure).
- The customer's identity (or that of their representative) cannot be verified.
- The meaning of the request is not clear and the customer has not responded to our reasonable efforts to seek clarification.
- The information requested does not fall within the scope of an information request
- The request is offensive or communicated in an abusive manner
- The request is clearly intended to cause disruption to GCH

REQUESTS FOR REVIEW AND COMPLAINTS

A customer may ask GCH to review its handling of a STAIRs information request where they are dissatisfied with the response, including a decision to refuse or redact information, the format in which information was provided, or any delay or other aspect of the way the request was handled. A customer may also request a review of if the GCH STAIRs publication scheme if information has not been proactively published or kept up to date.

Requests for review do not need to use the words “review”, “complaint” or “STAIRs”. GCH will identify and record the substance of the concern, make reasonable adjustments where required, and support customers or their representatives to explain the outcome they are seeking.

Requests for review will be handled by the Governance Team and involve other managers where required.

The review will reconsider the request, searches undertaken, information held, any grounds for withholding or redacting information, and whether the response was clear, timely and compliant with this policy and the STAIRs requirements.

GCH will acknowledge the review request promptly and aim to issue a written review outcome within 30 calendar days. If more time is reasonably required, we will explain the reason for the delay and provide a revised response date.

The outcome will state whether the original decision is upheld, varied or withdrawn, explain the reasons, provide any additional information to be disclosed, and set out the customer’s right to approach the Housing Ombudsman.

Complaints to the Housing Ombudsman
The Housing Ombudsman is the independent complaints body for STAIRs. Its STAIRs process is separate from the usual complaints process.

A customer may bring a STAIRs complaint to the Housing Ombudsman if they are dissatisfied with GCH’s response, or if GCH has not responded within 30 calendar days. A customer must first have made the relevant information request to GCH before they can take a complaint to the Housing Ombudsman.

The complaint should normally be referred to the Housing Ombudsman within three months of receiving GCH’s response, or within three months of the date by which the response should have been provided. The Ombudsman may exercise discretion where a complaint is made later. A former customer may also refer a complaint where they made the information request while they were eligible under STAIRs.

The Governance Team will maintain records of review requests, outcomes and Ombudsman referrals and use learning from them to improve the publication scheme, information management and service delivery.

TRAINING AND AWARENESS RAISING

A customer can make a STAIRs request to any member of GCH staff. Therefore, GCH will deliver training and awareness-raising to ensure all staff understand their role and expectations under STAIRs. This will be done by annually raising awareness and through guidance for all new starters.

All staff will be made aware of the responsibility to report or log STAIRs requests from customers and how to identify such requests.

Tailored training will be delivered to colleagues involved in handling individual requests.

ROLES AND RESPONSIBILITIES

All Staff

- Identifying a STAIRs request from a customer and reporting any such requests to the governance team, via the relevant process
- Signposting customers to our STAIRs website page, as required
- Identifying complaints regarding STAIRs and how to log them, in line with our usual complaints process

Director of Governance, Risk and Assurance

- Overseeing the effective implementation and ongoing compliance with STAIRs
- Ensuring that the GCH STAIRs webpage is kept up to date and reviewed in line with the approved publication scheme
- Ensuring the Governance Team are adequately trained in how to manage STAIRs requests and completing them within regulatory timeframes

Governance Team

- Handling individual STAIRs requests in line with regulatory requirements and our own internal processes
- Maintain a central information request log and record of information provided
- Supporting the complaints team to respond to any STAIRs related complaints

GCH contractors

Our contractors and managing agents will be expected to support us in delivering on STAIRs. We expect them to:

- search for and supply relevant records promptly;
- support us with redaction and review;
- meet GCH's deadlines; and
- comply with data-security requirements.

CONSULTATION

We will consult on how we implement the information request aspect of STAIRs with our customers.

Colleagues from across the organisation have been involved in all stages of our planning and implementation of STAIRs at GCH.

REVIEW

This policy will normally be reviewed triennially to ensure that it reminds fit for purpose, unless an earlier review is required due to regulatory, statutory or other requirements.