

Grainger Trust Limited ('GT')

Social Tenants Access to Information Requirements (STAIRs)

Chapter 1 Publication Scheme
Chapter 2 Information Request

July 2026

1. Introduction

Social Tenant Access to Information Policy

Grainger Trust (“GT”) is committed to transparency, accountability, and meaningful tenant engagement. This policy sets out how Grainger Trust will meet its statutory obligations under the Social Tenant Access to Information Requirements (STAIRs) and the Transparency, Influence and Accountability (TIA) Standard.

The Social Housing (Regulation) Act 2023 introduced significant reforms to consumer regulation in social housing, strengthening tenants’ rights, enhancing the Regulator of Social Housing’s powers, and placing greater emphasis on openness, accountability, and tenant influence. As part of these reforms, the Government introduced STAIRs to ensure that tenants of private registered providers have clear, enforceable rights to access information about how their homes and services are managed.

From 1 October 2026, compliance with the STAIRs publication requirements (Chapter 1) will form part of the Regulator of Social Housing’s Transparency, Influence and Accountability Standard. From 1 April 2027, tenants will also have a statutory right to request information under Chapter 2 of STAIRs.

This policy explains how Grainger Trust will comply with both elements of STAIRs in a manner that is proportionate, transparent, and consistent with good governance, while continuing to meet its legal obligations relating to data protection, confidentiality, safety and commercial sensitivity.

2. Purpose

The purpose of this policy is to:

- Set out Grainger Trust’s approach to complying with the Social Tenant Access to Information Requirements as incorporated into the Transparency, Influence and Accountability Standard under the Social Housing (Regulation) Act 2023;
- Ensure Grainger Trust meets its obligations in relation to:
 - **Chapter 1** – Proactive publication of information (effective from 1 October 2026); and
 - **Chapter 2** – Tenant rights to request information (effective from 1 April 2027);
- Support the objectives of the Transparency, Influence and Accountability Standard by:
 - Enabling tenants to understand how decisions are made;
 - Providing visibility of service delivery, performance, spending, and safety;
 - Supporting tenant scrutiny and informed engagement;
- Provide a clear and consistent framework for:
 - Publishing information through a formal Publication Scheme;
 - Handling Information Requests lawfully and within statutory timescales;

- Managing reviews and escalation to the Housing Ombudsman where required;
- Balance transparency with Grainger Trust's responsibilities to protect personal data, safeguard individuals and assets, preserve legal privilege, and manage commercially sensitive information appropriately.

This policy is supported by detailed procedures, staff guidance, and a formal Publication Scheme, and will be reviewed regularly to ensure ongoing compliance with regulatory and statutory requirements.

3. Definitions

For the purposes of this policy, the following definitions apply:

- i. **Annual Review**
A formal review of this policy, the STAIRs Publication Scheme, and associated procedures to ensure continued compliance with statutory and regulatory requirements.
- ii. **Chapter 1 – Proactive Publication**
The part of the Social Tenant Access to Information Requirements that requires private registered providers to proactively publish specified categories of information relating to the management of their social housing. Chapter 1 requirements take effect from 1 October 2026 and form part of the Transparency, Influence and Accountability Standard.
- iii. **Chapter 2 – Information Requests**
The part of the Social Tenant Access to Information Requirements that gives eligible tenants a statutory right to request information relating to the management of social housing held by a private registered provider. Chapter 2 requirements take effect from 1 April 2027.
- iv. **Commercially Sensitive Information**
Information where disclosure would be likely to prejudice Grainger Trust's commercial interests or those of a third party, including but not limited to pricing structures, tender evaluations, negotiation strategies, or confidential contractual terms.
- v. **Designated Representative**
An individual or organisation formally authorised by a tenant to act on their behalf for the purpose of making an Information Request under Chapter 2 of STAIRs.
- vi. **Exempt Information**
Information that Grainger Trust may lawfully withhold from disclosure under STAIRs, including information that:
 - Contains personal data relating to someone other than the requester;
 - Is subject to legal professional privilege;
 - Is commercially sensitive;
 - Could compromise health, safety or security;
 - Is restricted by statute or other legal obligation.

vii. Governance Information

Information relating to how Grainger Trust is directed and controlled, including board and committee structures, decision-making frameworks, policies, terms of reference, and accountability arrangements.

viii. Housing Ombudsman

The statutory body responsible for investigating complaints relating to social housing landlords, including complaints concerning compliance with the Social Tenant Access to Information Requirements.

ix. Information Held

Information that is recorded in any form (including electronic, paper, audio or visual formats) and is held by Grainger Trust at the date an Information Request is received. Grainger Trust is not required to create new information to respond to a request.

x. Information Request

A written request made by a social housing tenant, or their designated representative, seeking access to information held by Grainger Trust that relates to the management of its social housing, in accordance with Chapter 2 of STAIRs.

xi. Internal Review

A formal reconsideration of how an Information Request or publication requirement has been handled, carried out by a suitably senior person who was not directly involved in the original decision.

xii. Management of Social Housing

Activities undertaken by Grainger Trust in connection with its social housing, including but not limited to:

- Repairs and maintenance;
- Asset and stock management;
- Health and safety compliance;
- Service delivery and standards;
- Performance management;
- Spending and value for money;
- Tenant engagement and consultation.

xiii. Personal Data

Any information relating to an identified or identifiable living individual, as defined under the UK General Data Protection Regulation and the Data Protection Act 2018.

xiv. Private Registered Provider (PRP)

An organisation registered with the Regulator of Social Housing that provides social housing but is not a local authority. Grainger Trust is a private registered provider.

xv. Publication Scheme

A structured description of the categories of information that Grainger Trust proactively publishes under Chapter 1 of STAIRs, including where the information can be accessed and how often it is reviewed.

xvi. Redaction

The process of removing or obscuring specific exempt information from a

document prior to publication or disclosure, while providing access to the remainder of the information wherever lawful and appropriate.

xvii. Regulator of Social Housing (RSH)

The statutory regulator responsible for regulating registered providers of social housing in England, including setting and enforcing the Consumer Standards.

xviii. STAIRs (Social Tenant Access to Information Requirements)

The statutory framework introduced under the Social Housing (Regulation) Act 2023 that gives social housing tenants of private registered providers rights to access information relating to the management of social housing, through proactive publication and individual Information Requests.

xix. Transparency, Influence and Accountability (TIA) Standard

A Consumer Standard issued by the Regulator of Social Housing, which from 1 October 2026 incorporates the requirements of Chapter 1 of STAIRs and sets expectations regarding openness, accountability, and tenant involvement.

xx. Withholding

The lawful refusal to disclose information in full in response to an Information Request made under Chapter 2 of STAIRs, where a statutory exemption applies.

4. Roles and Responsibilities

Grainger Trust will ensure that clear accountability, ownership and escalation arrangements are in place to support effective compliance with the Social Tenant Access to Information Requirements and the Transparency, Influence and Accountability Standard.

4.1 Board of Grainger Trust

The Board has overall responsibility for ensuring that Grainger Trust complies with its statutory and regulatory obligations relating to transparency and access to information.

The Board will:

- Approve the Social Tenant Access to Information Policy and any material amendments;
- Receive assurance on compliance with STAIRs as part of its oversight of consumer standards;
- Ensure that appropriate governance, systems and controls are in place to support transparency;
- Consider material risks arising from information disclosure, including legal, safety and reputational risks.

4.2 Head of Grainger Trust

The Head of Grainger Trust has accountability for compliance with STAIRs.

Responsibilities include:

- Ensuring this policy and supporting procedures are implemented and embedded across the organisation;
- Ensuring that arrangements are in place to meet both:

- Chapter 1 – Proactive publication requirements; and
- Chapter 2 – Information Request rights;
- Ensuring that adequate resources and capability exist to meet statutory timescales;
- Acting as the escalation point for complex, sensitive or high-risk disclosure decisions;
- Ensuring that STAIRs compliance and emerging issues are reported to the Board.

4.3 STAIRs Lead / Information Governance Function

Grainger Trust will operate a STAIRs Lead function, rather than appointing a single named postholder, to reflect its size and operating model while ensuring clear ownership and accountability.

The STAIRs Lead function may be fulfilled collectively by:

- Housing Services Managers;
- Governance, Legal or Company Secretarial roles; and/or
- Information Governance or Data Protection roles.

The STAIRs Lead function is responsible for the coordination, oversight and assurance of STAIRs compliance.

Responsibilities include:

- Coordinating the proactive publication of information under Chapter 1;
- Maintaining and reviewing the STAIRs Publication Scheme;
- Ensuring published information is accurate, accessible and reviewed regularly;
- Logging, tracking and monitoring all Information Requests received under Chapter 2;
- Coordinating responses across service areas to ensure statutory timescales are met;
- Supporting consistent and lawful application of Redaction and exemption decisions;
- Maintaining an auditable record of requests, responses, exemptions and reviews;
- Acting as the central point of coordination for engagement with the Housing Ombudsman or Regulator of Social Housing where required.

Overall accountability for the STAIRs Lead function rests with the Head of Grainger Trust, who will ensure that responsibilities are appropriately allocated and documented.

4.4 Senior Management and Service Managers

Senior Management and Service Managers are collectively responsible for ensuring that STAIRs obligations are delivered effectively within their areas of responsibility and embedded into day-to-day service delivery.

Together, they play a critical role in supporting compliance with both Chapter 1 (proactive publication) and Chapter 2 (Information Requests).

Responsibilities include:

- Ensuring that information relating to their service areas is:
 - Accurate;
 - Complete;
 - Up to date;

- Supporting the proactive publication of information under Chapter 1, including governance, service delivery, performance, compliance, spending and tenant engagement information where relevant;
- Providing information promptly and cooperatively in response to Information Requests coordinated through the STAIRs Lead / Information Governance function;
- Confirming that information provided relates to the management of Grainger Trust's social housing and is already held;
- Ensuring that records are not deleted, amended or concealed following receipt of an Information Request;
- Identifying where information may require Redaction or may be subject to a lawful exemption;
- Escalating complex, sensitive or novel disclosure issues to the STAIRs Lead function, Head of Grainger Trust, or Governance/Legal advisers as appropriate;
- Identifying and flagging any potential safeguarding, health and safety, tenancy or reputational risks that could arise from the disclosure of information in line with the relevant GTL policies
- Supporting learning and continuous improvement arising from Information Requests, reviews, and Ombudsman findings.

Senior Management and Service Managers are expected to ensure that staff within their teams understand their responsibilities under this policy and complete any required training relating to STAIRs and information governance.

4.5 All Staff

All staff have a shared responsibility to support transparency and lawful information handling.

All staff must:

- Recognise and promptly pass on any written Information Request to the STAIRs Lead function;
- Handle information securely and in line with data protection requirements;
- Not delete, amend or conceal records after an Information Request has been received;
- Complete relevant training on STAIRs and information governance as required.

4.6 Internal Reviewer

Where an Internal Review is requested, it will be conducted by a suitably senior individual who:

- Was not involved in the original response or decision;
- Has authority to confirm, amend or overturn decisions;
- Will complete the review within statutory timescales;
- Will provide a clear written outcome and explain escalation rights to the Housing Ombudsman.

4.7 Governance / Legal / Information Governance Advisors

Where required, Governance, Legal or Information Governance advisors will:

- Provide advice on the application of exemptions, Redaction and Withholding;
- Support decisions involving legal privilege, litigation or commercially sensitive information;

- Advise on novel, complex or high-risk Information Requests;
- Support engagement with the Regulator of Social Housing and Housing Ombudsman.

4.8 Contractors and Third Parties

Where contractors or third parties hold information on behalf of Grainger Trust in connection with the management of social housing:

- Grainger Trust remains responsible for STAIRs compliance;
- Contractors may be required to provide information promptly to support publication or disclosure;
- Contract management arrangements will support timely access to relevant information.
- All information obtained from contractors or third parties will be reviewed prior to disclosure to ensure restricted information is handled consistently and lawfully

5. Regulatory Requirements and Tenant Rights

5.1 Regulatory Framework and Scope

Grainger Trust is required to comply with STAIRs in relation to information it holds that relates to the management of its social housing, whether that information is held directly by Grainger Trust or on its behalf by another body.

STAIRs do not require Grainger Trust to:

- Create new records or information;
- Disclose information unrelated to its social housing functions.

The framework includes:

- **Chapter 1** – Proactive publication of information, effective from 1 October 2026;
- **Chapter 2** – Tenant rights to request information, effective from 1 April 2027.

5.2 Provider Duties under Chapter 1 – Proactive Publication

From 1 October 2026, Grainger Trust must proactively publish, or otherwise make routinely available, information it holds that falls within prescribed categories relating to the management of its social housing.

As a PRP, Grainger Trust is required to:

- Identify information it already holds that falls within the Chapter 1 categories;
- Publish that information in a clear, accessible and structured way;
- Maintain a formal STAIRs Publication Scheme explaining what information is available and where it can be accessed;
- Make tenants aware of the existence of the Publication Scheme;
- Review published information regularly to ensure it remains accurate and up to date.

The publication requirement focuses on transparency and understanding, not volume or technical detail. Where published information contains material that cannot lawfully be disclosed, Grainger Trust may apply appropriate Redactions to protect:

- Personal data;
- Health, safety or security;
- Legal professional privilege;

- Commercial confidentiality.

5.3 Provider Duties under Chapter 2 – Information Requests

From 1 April 2027, Chapter 2 of STAIRs gives eligible tenants a statutory right to request information relating to the management of their social housing.

In response to a valid Information Request, Grainger Trust must:

- Confirm that the requester is a social housing tenant or their designated representative;
- Respond in writing within 30 calendar days;
- Provide information already held that falls within the scope of STAIRs;
- Apply lawful exemptions where disclosure is not permitted or appropriate;
- Explain clearly where information is withheld or redacted;
- Operate an Internal Review process where a tenant is dissatisfied with the response.

Grainger Trust must not delete, alter or obscure information following receipt of a request to prevent disclosure.

Under Chapter 2, where statutory exemptions apply and disclosure is not appropriate. Grainger Trust may lawfully:

- Redact information;
- Withhold information in full

5.4 Tenant Rights under the STAIRs Direction

Under STAIRs, Grainger Trust's social housing tenants have the right to:

- Access information proactively published under Chapter 1;
- Submit written requests for information held by Grainger Trust under Chapter 2;
- Receive responses within statutory timescales;
- Receive clear explanations where information is redacted or withheld;
- Request an Internal Review if dissatisfied with how a request is handled;
- Escalate unresolved concerns to the Housing Ombudsman, which has jurisdiction over STAIRs complaints.

6. Publication Scheme (Chapter 1)

Under Chapter 1 of the STAIRs, Grainger Trust is required to maintain a Publication Scheme that sets out the information it proactively publishes relating to the management of its social housing where information is readily available

The Publication Scheme is intended to:

- Enable tenants to easily identify and access information;
- Support transparency and understanding of how Grainger Trust is run;
- Reduce the need for individual Information Requests where information is routinely available.

Grainger Trust's Publication Scheme must:

- Specify the classes of information that are published;
- Identify what information is published and where it is held;
- Explain how tenants can access the information;
- Be kept under regular review and updated as necessary;
- Be made known to tenants so information can be easily found.

6.1 Publication Categories

The Publication Scheme must include information Grainger Trust holds relating to the management of its social housing within the following prescribed categories:

i. Governance and Decision-Making

Including information that enables tenants to understand how Grainger Trust is governed and how decisions are made, such as:

- Governance framework and structures;
- Board and committee roles and responsibilities;
- Decision-making arrangements and delegations;
- Tenant consultation and engagement approaches.

ii. Spending

Including summary-level information that helps tenants understand how money is spent on social housing, such as:

- High-level spending information;
- Service charge income and expenditure;
- Capital investment summaries;
- Procurement and contract information (where held).

iii. Housing Stock Management

Including information on how homes are managed and maintained, such as:

- Asset management approach;
- Planned maintenance programmes;
- Stock condition information;
- Environmental or sustainability initiatives.

iv. Performance

Including information that allows tenants to assess service delivery and outcomes, such as:

- Tenant Satisfaction Measures (TSMs);
- Key performance indicators;
- Complaints performance;
- Health and safety compliance summaries.

v. Housing Services

Including information explaining what services are provided and how they operate, such as:

- Repairs and maintenance policies;
- Anti-social behaviour processes;
- Complaints handling arrangements;

- Service standards and expectations.

vi. Lists and Registers

Including summary-level information from registers Grainger Trust already holds, such as:

- Asset or property registers (summary level);
- Contractor or supplier lists;
- Health and safety compliance registers (summary level).

vii. Social Housing Management Information

Including other information used to manage social housing functions, such as:

- Operational processes;
- Policies and procedures guiding service delivery;
- Management frameworks relevant to tenants.

7. Redaction of information under Chapter 1

Where information falling within the Publication Scheme contains material that cannot lawfully be disclosed, Grainger Trust may apply Redactions.

Redaction may be applied to protect:

- Personal data;
- Health, safety or security;
- Legal professional privilege;
- Commercially sensitive information.

8. Information Requests under Chapter 2 of STAIRs

This section sets out how Grainger Trust will meet its statutory obligations under **Chapter 2 of the Social Tenant Access to Information Requirements**, which gives eligible tenants the right to request information relating to the management of their social housing.

Chapter 2 requirements apply from **1 April 2027**.

8.1 Scope and Eligibility of Information Requests

Information Requests under Chapter 2 may be made by:

- A Grainger Trust social housing tenant; or
- A tenant's designated representative, where appropriately authorised including practical verification such as identity checks proportionate to the request
- Requests must relate to information held by Grainger Trust that concerns the management of its social housing, including services, performance, safety, spending, policies, and decision-making.

Chapter 2 does not apply to:

- Information relating to non-social-housing activities;
- Matters determined by local councils or other bodies; or
- Information not held by, or on behalf of, Grainger Trust.
- Members of the public or those who are not a GT tenant or verified representative of a GT tenant

Grainger Trust is not required to create new records to respond to an Information Request. A clear decision-making process will be applied for assessing the scope of the

request and where a request is determined to be outside of the scope reasons will be documented.

9. Making an Information Request

Information Requests must be made in writing and may be submitted through any reasonable written channel identified by Grainger Trust.

Requests should provide sufficient detail to allow the requested information to be identified.

Where a request is unclear, Grainger Trust may seek clarification in order to process it effectively.

10. Timescales and Response Requirements

Grainger Trust will respond to valid Information Requests within 30 calendar days of receipt of a valid request. This timeframe runs from the date the request is received, not from the date acknowledgement is issued. Where clarification, proof of identity or representative authority is required, the response timeframe will start once the required information has been received.

Clarification or verification will be requested promptly where needed, and key dates will be recorded to ensure the correct statutory timeframe is applied and monitored.

At acknowledgement stage, Grainger Trust will record the date received, request reference, target response date, any clarification or verification required, the route for providing this information, and the contact route for further queries.

Responses will:

- Confirm whether the information is held;
- Provide the Information Requested, subject to any lawful exemptions;
- Explain any Redactions or Withholding applied; and
- Set out the tenant's right to request an Internal Review.

Requests will be logged and tracked to ensure statutory timescales are met. Internal handling timescales will be:

- **Within 5 working days:** Escalate complex, sensitive, high-risk or novel disclosure issues to the STAIRs Lead.
- **Within 10 working days:** Relevant service areas and contractors must provide requested information or confirm whether it is held.
- **By working day 15:** Escalate cases requiring legal, governance, data protection or Head of Grainger Trust review.
- **By working day 20:** Aim to respond to the request.

11. Exemptions, Redaction and Withholding (Chapter 2)

Under Chapter 2, Grainger Trust may lawfully apply **Redaction** or **withhold information in full** where statutory exemptions apply.

Decisions to withhold information will follow a clear decision-making process, taking account of proportionality, the evidence supporting the exemption, and the appropriate approval or escalation route.

Exemptions may be applied where disclosure would:

- Breach data protection legislation;
- Reveal personal data relating to third parties;
- Compromise health, safety or security;
- Prejudice legitimate commercial interests;
- Breach legal professional privilege; or
- Conflict with other statutory restrictions.

Where an exemption is relied upon, Grainger Trust will provide a clear explanation and inform the tenant of their review and escalation rights.

12. Internal Review Process

Where a tenant is dissatisfied with how an Information Request has been handled, they may request an Internal Review.

Internal Reviews will:

- Be conducted by a suitably senior individual not involved in the original decision;
- Consider the handling and outcome of the request afresh;
- Be completed within statutory timescales; and
- Confirm the outcome in writing, including reasons and next steps.

13. Escalation to the Housing Ombudsman

If a tenant remains dissatisfied following an Internal Review, they may escalate the matter to the Housing Ombudsman.

The Housing Ombudsman has jurisdiction to investigate complaints relating to compliance with STAIRs, including both publication and Information Request handling.

Grainger Trust will cooperate fully with any Ombudsman investigation.

14. Record-Keeping and Learning

Grainger Trust will maintain appropriate records of:

- Information Requests received;
- Responses issued;
- Redactions and Withholding decisions;
- Internal Reviews and outcomes.

Learning arising from Information Requests, reviews and Ombudsman determinations will be used to strengthen transparency, publication practices and service delivery.

15. Accessibility and Tenant Awareness (Chapters 1 and 2)

Grainger Trust will ensure that both proactively published information and the Information Request process are **accessible, understandable and well-communicated** to tenants.

Grainger Trust will:

- Use clear, plain language where reasonably practicable;
- Ensure published information and responses are structured and signposted;
- Take reasonable steps to support tenants who cannot access digital information;
- Make tenants aware of:
 - The STAIRs Publication Scheme;
 - Their right to request information under Chapter 2; and
 - How to seek support or clarification.

Tenant awareness will be supported through appropriate communication channels and

kept under review to ensure information remains easy to find and understand.

16. **Review, Monitoring and Maintenance (Chapters 1 and 2)**

Grainger Trust will keep its STAIRs arrangements under regular review to ensure ongoing compliance with statutory and regulatory requirements.

This includes:

- Reviewing and updating the **Publication Scheme** to ensure information remains accurate and current;
- Monitoring compliance with **Information Request handling**, including statutory timescales;
- Reviewing Redaction, exemption and Withholding decisions for consistency and proportionality;
- Considering learning from Internal Reviews and Housing Ombudsman findings.
- An annual review will be presented to the GT Board on volumes of requests, compliance with timescales, exemptions, themes of requests and any Housing Ombudsman findings.

17. **Associated Legislation, Standards, Policies and Procedures**

This policy should be read alongside relevant legislation, regulatory standards, and Grainger Trust policies and procedures, including:

- Social Housing (Regulation) Act 2023, STAIRs and the Regulator of Social Housing Consumer Standards, including the Transparency, Influence and Accountability Standard;
- UK GDPR, Data Protection Act 2018, Equality Act 2010 and Human Rights Act 1998;
- Relevant housing, health and safety, building safety, fire safety, gas, electrical and water hygiene legislation and statutory guidance;
- Housing Ombudsman Complaint Handling Code and associated complaints requirements;
- Grainger Trust policies and procedures covering data protection, records retention, information security, complaints, ASB, safeguarding, domestic abuse, repairs, health and safety compliance, resident engagement, equality and vulnerability support;

Document Owner and Approval

The Head of Grainger Trust is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements.

A current version of this document is available to all members of staff on the corporate intranet.

Document History

Policy Owner	Name Head of Grainger Trust
Date of last review	Date July 2026 (draft)
Date of next review	Date July 2029
Version control	V0.1