

# STAIRs POLICY

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# Social Housing Tenant Access to Information Requirements (STAIRs) Policy

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|-------------------------------|------------------------------|
| Responsible Officer           | Group Director of Governance |
| This policy is applicable to  | Karbon Group                 |
| Policy version                | 1                            |
| Date this version implemented | 1 October 2026               |
| Date of next review           | 1 October 2029               |

## Policy Statement

This policy explains how the Karbon Homes Group (the Group) will meet the Social Tenant Access to Information Requirements (STAIRs). It sets out how customers and their representatives can access information about social housing services through a publication scheme and individual information requests.

It also explains when information may be withheld or redacted, how complaints can be raised, and how compliance will be monitored.

## Risk the policy is designed to control

6. Governance and Compliance – Failure to comply with statutory and regulatory requirements.

## Key performance measures

- Number of STAIRs service requests received
- Number of STAIRs review complaints received
- Percentage of requests and complaints responded to within timescale
- Lessons learned from complaints

## Definitions

**Customer:** Any current customer of the Karbon Group.

**Representative:** Any person a customer authorises to act on their behalf.

**Publication scheme:** Key information that we publish proactively, ensuring our customers can access important details about their housing management and services. This information will be published on our website, with other formats available on request.

**STAIRs Information Service Request:** Requests for information about our housing management and services made by a customer or their representative

**STAIRs Review Complaint:** Complaints under this STAIRs policy

**Awaab's Law:** Awaab's Law was introduced in response to the tragic death of Awaab Ishak. The law aims to ensure that social landlords address significant hazards like damp and mould in a timely manner, enhancing customer safety and communications

**Redaction:** hiding or crossing out part of a document. This is usually done to protect other people's personal data, due to risk or harm or risk to safety, or due to commercial sensitivity.

**Harm:** Physical, mental, financial or operational/commercial harm. We will consider likelihood of harm in making any disclosure, including how serious the harm could be and if it is possible or reasonably likely.

## **Abbreviations**

**The Group:** The Karbon Homes Group

**STAIRs:** Social Tenants Access to Information Requirements

**The Regulator:** The Regulator of Social Housing

**Service Request:** STAIRs Information Service Request

**Complaint:** STAIRs Review Complaint

## **Policy Detail**

### **1.0 Purpose of policy**

- 1.1 This policy aims to ensure that our customers are able to access information from us.
- 1.2 The policy sets out how the Karbon Homes Group (the Group) will promote access to information through a formal publication scheme, and support customers to make information requests.

### **2.0 Objectives**

- 2.1 The objectives of this policy are to:
  - Meet statutory and regulatory requirements under the Social Tenant Access to Information Requirements (STAIRs), introduced through the Consumer Standards by the Regulator of Social Housing.
  - Promote transparency, openness and accountability by making information about social housing services available to customers.
  - Enable customers and their representatives to access information about how services are delivered, both through a formal publication scheme and individual information service requests.
  - Support customer involvement by helping customers understand decisions, services and the way the Group operates.
  - Provide clear arrangements for making and handling information service requests, including who can make requests, how requests can be submitted, response times and support for customers who need help.
  - Ensure information is accessible, including availability in alternative formats where required.
  - Set out when information may be withheld or redacted, balancing disclosure with data protection, legal requirements and potential harm.
  - Provide a route for review and complaint where customers are unhappy with how information has been published, provided, withheld or redacted.

- Maintain records and reporting arrangements so the Group can monitor compliance and learn from complaints.

### 3.0 Policy detail

- 3.1 This policy is based on the Social Tenant Access to Information Requirements (STAIRs), introduced under the Consumer Standards by the Regulator of Social Housing (the Regulator).
- 3.2 STAIRs is designed to enable customers and their representatives to be able to access information about how their services are delivered.
- 3.3 From 1 October 2026, the Group will publish information through a formal STAIRs publication scheme.
- 3.4 From 1 April 2027, the Group will respond to service requests from customers and their representatives for specific information.
- 3.5 Customers and their representatives have a right to complain to us under STAIRs.
- 3.6 STAIRs upholds the key principles of:
- transparency
  - openness
  - accountability
  - customer involvement in how services are delivered.

#### 3.7 Publication Scheme

The Group will proactively publish information relating to the management of its social housing functions. We are committed to being open and transparent about the way we work, the services we provide and the decisions we make.

The table at **Appendix 1** sets out a non-exhaustive list of classes of information we routinely publish.

Information will be published on the Karbon Homes website, and on the 54 North Homes website for 54 North Homes-specific information.

The Group will publish information which is up to date and correct as at the date of publication.

#### 3.8 Information Service Requests - Who can make information service requests?

The Group will respond to information service requests that are made either by a current customer of the Group or by their designated representative.

We will only respond where we can confirm the identity of the requesting customer (and their representative, where appointed). There are no restrictions on who you may choose as your representative.

There is no limit to the number of information service requests a customer or their designated representative can make. However, in line with section 3.13 below,

requests may be refused where they are excessive, repeated, or clearly intended to cause disruption to the Group.

You can request historical information, and this will be supplied if it is still held by the Group (subject to 3.13 below).

### **3.9 How to make an information service request**

We will accept requests that are made in writing, including by email, text message, and social media, as long as we can identify who you are. Your request does not have to specifically mention 'STAIRs' for it to be considered under this policy.

We recognise that some customers may require additional support to make a request and we will ensure that appropriate arrangements are in place to support all customers to be able to exercise their rights under STAIRs.

### **3.10 Information service requests - How long will it take us to respond?**

We will provide an acknowledgement of receipt of your request within 5 working days of receipt.

We will respond to your request within 30 calendar days from receipt of your request, or, where the request requires clarification, 30 days from receipt of clarification. The Group 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, the Group will inform you at the earliest opportunity. Every effort will be made to respond in a reasonable timeframe where any extension is required.

If there is likely to be any delay, we will provide you with a reason for the delay together with our best estimate of when you are likely to receive a response.

### **3.11 Alternative formats**

Information available on the Karbon Homes / 54 North Homes website can be provided in alternative formats on request. A single copy of the information can be provided free of charge in an alternative format.

For individual information service requests, information available under STAIRs is generally available free of charge. The information you request will usually be sent to you securely via email. Where information is required in a non-electronic format, please contact us to discuss your requirements. The Group is committed to ensuring that information is made available in a way that is accessible as possible for all our customers.

Where an individual requests additional copies of information, we may apply charges to cover the actual costs incurred in providing additional copies.

### **3.12 Record keeping and transparency**

The Group will maintain a log of all information service requests and timelines for responding to requests for reporting and accountability purposes.

The Group will publish to customers information on:

- the number of and reason for information service requests received under this policy
- the number of STAIRs Review complaints received under this policy, with outcomes
- the number of escalations to the Housing Ombudsman, with outcomes
- adherence to the timescales in this policy
- lessons learned.

### 3.13 **Out of Scope / Withheld Information**

The Group is not required to create new information to meet the publication scheme or respond to information service requests.

Before publishing information, the Group will consider whether it falls within the classes of information set out in **Appendix 1**. Documents may be redacted before publication. We will publish a list of reasons we redact information.

For information service requests, the Group will consider whether information should be withheld or redacted. We may refuse a request where:

- it is reasonable to withhold the information from disclosure\*
- disclosure may cause harm, having balanced the factors favouring disclosure against the likelihood of harm
- your identity, or that of your representative, cannot be established
- the request is unclear and you have not responded to reasonable requests for clarification
- the information is not relevant information under STAIRs
- responding would exceed 18 hours of colleague time
- the request is excessive or repeated, including coordinated or duplicate requests from multiple customers
- the request is offensive, abusive, or clearly intended to cause disruption to the Group.

\* When deciding whether to withhold or redact information, we will consider freedom of information, data protection and any other relevant laws. We will usually aim to share information unless there are stronger reasons not to. This includes considering whether sharing the information could cause harm. We will make sure any decision to withhold or redact information can be clearly explained and justified.

### 3.14 **Complaints**

If you consider that the Group has not published information or responded to your request for information appropriately, please contact us to make a STAIRs Review complaint.

A STAIRs Review complaint should generally be made within 3 months of receipt of the original decision.

We will respond to your complaint by assessing:

- how we have responded to your service request for information (for example, where we may not have provided information in an accessible format)
- where we have not published relevant information that we may hold and which you believe you may be entitled to
- where we have not complied with timelines for responding to your service request and there is no good reason to have applied an extension
- 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 the publishing of relevant information or your individual information service request, as appropriate. We aim to respond to your complaint within 30 calendar days of receipt.

It may be necessary in exceptional circumstances to extend the timeline for a response. (Examples of this may be if we faced a serious disruption to our services due to a cyber-attack or other period of forced downtime to service delivery). If this is necessary, we will let you know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

### **3.15 Escalating to the Housing Ombudsman**

If you are not happy with our response to your STAIRs Review complaint, when you have received the response you are able to escalate your complaint directly to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme. The Housing Ombudsman can be contacted at [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk) or on 0300 111 3000.

Any complaint to the Ombudsman should generally be made within 3 months of the outcome of the complaint.

## **4.0 Customer Vulnerabilities**

- 4.1 This policy is applied in line with our Customers in Vulnerable Circumstances Policy. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services.
- 4.2 We will support people in vulnerable circumstances to help us deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people in vulnerable circumstances and to ensure we meet our statutory and regulatory requirements as a social landlord.
- 4.3 Policies and key information are made available on our website.

## **5.0 Monitoring and Review**

- 5.1 The owner of this policy is responsible for its monitoring and review. The policy will be reviewed at least every three years, or sooner where there are changes to legislation, regulation or best practice.

- 5.2 We will maintain a log of all information requests and all requests for review and document learnings from complaints.
- 5.3 We will report numbers of information requests and requests for review, and lessons learned, to our leadership team on a quarterly basis and at least annually to our Group Audit and Risk Committee.

## **6.0 Equality and Diversity**

- 6.1 This policy is applied in line with our Inclusion and Belonging Policy. This includes the legal requirements of the Equality Act 2010, Workers Protection Act 2023 and the Public Sector Equality Duty.
- 6.2 At the Karbon Group we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.
- 6.3 If you would like this or any other policies in a different language or format please contact [inclusion@karbonhomes.co.uk](mailto:inclusion@karbonhomes.co.uk).

## **7.0 Data Protection and Privacy**

- 7.1 We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation, the Data Protection Act 2018 and other associated legislation. This is clearly set out in the Data Protection Policy for the Karbon Group which, along with its associated procedures, must be followed throughout the operation of this policy.
- 7.2 Where any information requested amounts to identifiable personal data or could become identifiable personal data when combined with other information, this information may be withheld from disclosure in compliance with data protection laws.
- 7.3 Individuals wishing to request their own identifiable personal data can do so through the Group's Subject Access Request procedure, and not through STAIRs.

## APPENDIX 1 – Classes of information we routinely publish

| Class of information                | Information typically included                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Governance and decision making      | <ul style="list-style-type: none"> <li>• Our Group strategy</li> <li>• Our Group structure</li> <li>• Information on our boards, committees and Group Executive Team</li> <li>• Our decision-making processes</li> <li>• Information on how to get involved and have your say</li> <li>• Information on how to make a complaint</li> <li>• Summaries of our Group Board and Group Customer Committee meetings</li> </ul>                                 |
| Finance and spending                | <ul style="list-style-type: none"> <li>• Our audited accounts and financial statements</li> <li>• Information on income and spending</li> <li>• Procurement procedures for goods and services for the provision of housing management services</li> <li>• Contracts and tenders that exceed £500 for housing management services</li> </ul>                                                                                                              |
| Housing stock management            | <ul style="list-style-type: none"> <li>• Corporate plans, policies and objectives</li> <li>• Stock profile and transfers</li> <li>• Data on our homes</li> <li>• Information on home safety, damp and mould and disrepair</li> </ul>                                                                                                                                                                                                                     |
| Performance                         | <ul style="list-style-type: none"> <li>• Performance reviews and evaluation reports</li> <li>• Explanation of our key performance indicators</li> <li>• Inspection outcomes and ratings</li> <li>• Internal and external audits relating to housing management services</li> <li>• Tenant Satisfaction Measures</li> <li>• Annual Customer Report</li> <li>• Media releases</li> <li>• Complaints handling procedures and performance metrics</li> </ul> |
| Housing services and tenant liaison | <ul style="list-style-type: none"> <li>• Description of services, advice and guidance for customers</li> </ul>                                                                                                                                                                                                                                                                                                                                           |
| Lists and registers                 | <ul style="list-style-type: none"> <li>• Building safety information</li> <li>• Fire risk assessment information for communal and multi-occupied buildings</li> </ul>                                                                                                                                                                                                                                                                                    |
| Social housing management           | <ul style="list-style-type: none"> <li>• Policies and strategic plans relating to the management of social housing</li> </ul>                                                                                                                                                                                                                                                                                                                            |

[Remove this back sheet when publishing externally / to customers]

|                                                                            |                                                                                                                    |
|----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| <b>Approved by</b>                                                         | Group Board                                                                                                        |
| <b>Date approved</b>                                                       | 28 September 2026                                                                                                  |
| <b>Frequency of review</b>                                                 | Every 3 years, or more frequently where there are changes to relevant legislation, regulation, or best practice    |
| <b>Last reviewed by</b>                                                    | Group Board                                                                                                        |
| <b>Date of last review</b>                                                 | 28 September 2026                                                                                                  |
| <b>Key related documents</b> (policy, procedure, customer literature)      | STAIRs Procedure<br>Complaints, Compliments and Suggestions Policy                                                 |
| <b>Sources of best practice or guidance used in developing this policy</b> | NHF Guidance 2026 – Social Tenant Access to Information Requirements Operational Guidance for Registered Providers |
| <b>Author of this policy version</b>                                       | Group Governance and Risk Manager                                                                                  |

| <b>Document change history</b> |          |                  |
|--------------------------------|----------|------------------|
| Version                        | Date     | Changed sections |
| 1                              | Oct 2026 | New policy       |
|                                |          |                  |

| <b>Equality Impact Assessment</b>                     |                      |
|-------------------------------------------------------|----------------------|
| Include below the dates/outcomes from most recent EIA |                      |
| Equality Impact Assessment (EQIA)                     | EQIA Date: July 2026 |

| <b>Consultation</b>                             |                                                                                                                                |                             |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| <b>Consultation Group</b>                       | <b>Needs to be consulted when ...</b>                                                                                          | <b>Date of Consultation</b> |
| Colleague Forum                                 | Where a new policy or major policy change affects colleagues                                                                   | n/a                         |
| Unions                                          | Where a new policy or major policy change affects colleagues                                                                   | n/a                         |
| Customers (including customers of subsidiaries) | Where a new policy or major policy change affects customers                                                                    | August 2026                 |
| 54North colleagues                              | To agree any wording needed in the policy to reflect differences in 54North structure and processes                            | August 2026                 |
| Inclusion and Belonging                         | An updated EQIA must be completed every time there is a new version of the policy                                              | July 2026                   |
| Data Protection                                 | The Data Protection team must be consulted every time there is a new version of the policy as an updated DPIA may be required. | August 2026                 |

|                                   |                                                                                                                                                    |                |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Legal                             | For all new policies or major policy changes to consider if there are any legal implications and check if a legal review or advice is required     | August 2026    |
| Corporate Health and Safety Group | For health and safety policies                                                                                                                     | n/a            |
| KLT                               | Approves minor changes.<br>(Circulate to KMT major policy changes/ new policies for awareness and any feedback)                                    | August 2026    |
| Exec Team                         | Approves major changes to non-key policies.<br>(Circulate to Exec major policy changes/ new policies for awareness and any feedback)               | September 2026 |
| Board Committees                  | Scrutinise new key policies or major changes to key policies in their areas. Approve specific key policies outlined in Group Delegatory Framework. | n/a            |
| Subsidiary boards                 | Review and agree adoption of any new policies/major key policy changes going to Group Board                                                        | September 2026 |
| Group Board                       | Approve new key policies and major changes to key policies                                                                                         | September 2026 |