

Social Tenant Access to Information Requirements (STAIRs) Policy

1. Purpose

- 1.1 Connexus is committed to openness, transparency and accountability in the management of social housing.
- 1.2 This policy explains Connexus' commitment to transparency under STAIRs and provides a framework for customers and colleagues to understand their roles and responsibilities.
- 1.3 This policy sets out Connexus' high-level approach to meeting the Social Tenant Access to Information Requirements (STAIRs), including publishing specified information and responding to eligible customer information requests.
- 1.4 This is a high-level policy. Day-to-day requirements are set out in the supporting procedures listed in Appendix 1.

2. Scope

- 2.1 The policy applies to the whole of the Group. This means Connexus Homes Limited, (ultimate parent) and all of its subsidiaries.
- 2.2 This policy applies to:
 - all colleagues, board and committee members
 - contractors, consultants and partners who hold or manage relevant information on behalf of Connexus
- 2.3 It applies to recorded information held by Connexus, or held on its behalf, that relates to the management of Connexus' social housing.
- 2.4 Connexus is not required to create new information where it is not already held. The supporting procedures explain how unavailable information and out-of-scope requests will be managed.

3. Definitions

Customer

- 3.1 For the purposes of STAIRs, an eligible customer is a current social housing tenant or leaseholder of Connexus who is entitled to request information under STAIRs.

Designated Representative

- 3.2 A person authorised by an eligible customer to act on their behalf in relation to a STAIRs request, review or other STAIRs matter.

STAIRs Request

- 3.3 A written request for recorded information about the management of Connexus' social housing made under STAIRs.

Publication Scheme

- 3.4 The information that Connexus is required to publish or routinely make available under STAIRs to support transparency about the management of social housing.

STAIRs Review

- 3.5 A review requested by a customer to reconsider a decision made under STAIRs. This is separate from Connexus' standard complaints process.

4. What STAIRs Means

- 4.1 STAIRs gives social housing customers greater access to information about how their homes and housing services are managed.
- 4.2 The provisions relating to individual STAIRs information requests, and reviews of decisions made in response to those requests, will apply from 1 April 2027.
- 4.3 STAIRs is being introduced in two phases:
- Phase 1: from 1 October 2026, specified classes of information will be proactively published or routinely made available.
 - Phase 2: from 1 April 2027, eligible current customers or their designated representatives can make written requests for recorded information covered by STAIRs.

5. Our Commitments

- 5.1 Connexus will:
- explain our decisions clearly where information cannot be provided
 - maintain a clear and accessible STAIRs publication scheme
 - make information easy to find and access wherever reasonably practicable
 - recognise and respond to valid STAIRs requests within the applicable timescale
 - start from a position of openness while protecting information that should not be disclosed
 - apply withholding, redaction and refusal decisions reasonably and consistently
 - keep appropriate records to demonstrate compliance and support learning

- provide guidance and awareness so colleagues can recognise and refer potential STAIRs requests promptly

6. Publication of Information

- 6.1 Connexus will publish or routinely make available information it holds within the STAIRs publication classes where it relates to the management of social housing and can be published safely and appropriately. Information will mainly be published on the Connexus website but will be made available in an alternative accessible format where reasonably required.
- 6.2 The STAIRs Phase 1 Publication Scheme Procedure sets out how information is identified, approved, published, reviewed and updated.

7. STAIRs Information Requests

- 7.1 Potential STAIRs requests must be referred promptly to the Information Governance Manager via STAIRs@connexus-group.co.uk in accordance with the supporting procedures. Where a colleague is unsure whether a contact or request falls within STAIRs, they should refer it for advice rather than making that decision themselves.
- 7.2 The STAIRs Phase 2 Information Requests Procedure sets out the detailed process for recognition, validation, clarification, searches, response times, redaction, refusal, review and record keeping.

8. Protecting Information

- 8.1 STAIRs does not override data protection law or other legal and regulatory duties.
- 8.2 Connexus will be as open as possible but may withhold or redact information where required to protect personal data, confidentiality, safety, security or other legal rights, including:
- personal data and third-party rights
 - confidentiality or legal privilege
 - commercial interests
 - health and safety, security or safeguarding
 - regulatory or legal investigations
- 8.3 Detailed decision-making requirements are set out in the STAIRs Phase 1 Publication Scheme Procedure and the STAIRs Phase 2 Information Requests Procedure.

9. Reviews and Escalation

- 9.1 If a customer is unhappy with the publication scheme, the handling of a STAIRs request, or a decision made under STAIRs, they may request a STAIRs review. A request for review should be submitted in writing by emailing STAIRs@connexus-group.co.uk within 20 working days of receiving the decision. Alternative ways of requesting a review will be made available where a customer requires support or an accessible communication method.

- 9.2 A review is separate from Connexus' standard complaints process and will be conducted in accordance with the STAIRs Phase 2 Information Requests Procedure.
- 9.3 Connexus will acknowledge the review request and arrange for the matter to be reviewed by an appropriately authorised colleague who was not involved in the original decision, wherever practicable.
- 9.4 If the customer remains dissatisfied after the STAIRs review has been completed, Connexus will provide details of any further routes available, including referral to the Housing Ombudsman where appropriate.

10. Roles and responsibilities

All Colleagues

- 10.1 Must recognise and promptly refer potential STAIRs matters, follow the relevant procedures and support reasonable searches for information to the Information Governance Manager via STAIRs@connexus-group.co.uk.

Managers and Heads of Service

- 10.2 Managers and Heads of Service are responsible for ensuring information in their service areas is accurate, appropriately managed and provided when required for publication or request handling.

Information Governance Manager

- 10.3 Owns this policy, coordinates STAIRs arrangements, provides advice, maintains oversight records and monitors compliance.

11. Monitoring and Review

- 11.1 Connexus will monitor compliance and use assurance activity, reviews, complaints and learning to support continuous improvement.
- 11.2 This policy will be reviewed at least every three years, or sooner where there are material changes to STAIRs requirements, regulatory guidance or Connexus operating arrangements.

12. Appendices

Appendix 1 – Policy to Procedure Mapping Table

13. Document Control

Approved by ELT	22 September 2026
Approved by Committee/Board	N/A
Effective date	22 September 2026
Review date	31 August 2029
Policy developed by	Information Governance Manager (DPO)

Consultations	N/A
Associated documents	Procedures and documents listed in Appendix 1 Data Protection Policy Data Subject Rights / DSAR Procedure Complaints Policy and Procedure Records Retention Schedule Information Asset Register Publication decision log and STAIRs disclosure log

Version	Author	Date Published	Next Review	Comments
1.0	Information Governance Manager (DPO)	30 Sep 2026	31 Aug 2029	New policy to ensure compliance with the Social Tenant Access to Information Requirements: policy statement, as updated 30 September 2025

Policy to Procedure Mapping Table

Policy section	Policy requirement	Supporting procedure / document	Purpose	Owner
1. Purpose	Sets Connexus' high-level approach to meeting the STAIRs requirements	STAIRs Phase 1 Publication Scheme Procedure; STAIRs Phase 2 Information Requests Procedure	Provides the detailed operational arrangements supporting this policy	Information Governance Manager (DPO)
2. Scope	Applies to recorded information held by Connexus, or on its behalf, relating to the management of its social housing	STAIRs Guidance Note; STAIRs Phase 1 Publication Scheme Procedure; STAIRs Phase 2 Information Requests Procedure	Helps colleagues identify information and requests that may fall within STAIRs	Information Governance Manager (DPO)
3. Definitions	Defines the key terms used within the policy	STAIRs Guidance Note	Supports consistent understanding and application of STAIRs terminology	Information Governance Manager (DPO)
4. What STAIRs Means	Explains the phased introduction of the publication scheme and information request requirements	STAIRs Guidance Note	Explains Phase 1, Phase 2 and how STAIRs relates to other information access routes	Information Governance Manager (DPO)

Appendix 1 – Internal Governance Reference

Policy section	Policy requirement	Supporting procedure / document	Purpose	Owner
5. Our Commitments	Requires openness, accessibility, timely handling, appropriate protection of information and accountable decision-making	STAIRs Phase 1 Publication Scheme Procedure; STAIRs Phase 2 Information Requests Procedure	Translates Connexus' commitments into operational controls	Information Governance Manager (DPO)
6. Publication of Information	Requires information within the relevant publication classes to be identified, approved, published, reviewed and updated	STAIRs Phase 1 Publication Scheme Procedure	Sets out the arrangements for safe, accurate and accessible publication and records publication decisions	Information Governance Manager (DPO)
7. STAIRs Information Requests	Requires potential requests to be referred and handled consistently	STAIRs Phase 2 Information Requests Procedure; STAIRs Guidance Note; STAIRs disclosure log	Sets out the process for recognition, validation, clarification, searches, responses and record keeping	Information Governance Manager (DPO)
8. Protecting Information	Requires withholding, redaction and refusal decisions to be lawful, reasonable, consistent and recorded	STAIRs Phase 1 Publication Scheme Procedure; STAIRs Phase 2 Information Requests Procedure; Data Protection Policy; Data Subject Rights Request Procedure	Supports safe publication and disclosure and ensures personal data and other protected information are handled under the correct legal route	Information Governance Manager (DPO)

Appendix 1 – Internal Governance Reference

Policy section	Policy requirement	Supporting procedure / document	Purpose	Owner
9. Review and Escalation	Enables customers to request reconsideration of a STAIRs decision and provides appropriate further escalation routes	STAIRs Phase 2 Information Requests Procedure; STAIRs review and disclosure records	Sets out how review requests are received, acknowledged, independently considered, responded to and recorded	Information Governance Manager (DPO)
10. Roles and Responsibilities	Requires colleagues to recognise and refer potential STAIRs matters and service areas to maintain and provide relevant information	STAIRs Guidance Note; STAIRs Phase 1 Publication Scheme Procedure; STAIRs Phase 2 Information Requests Procedure	Defines operational responsibilities, referral arrangements and escalation routes	Information Governance Manager (DPO)
11. Monitoring and Review	Requires compliance, assurance, complaints and learning to be monitored and the policy to be reviewed periodically	Publication decision log; STAIRs disclosure log; STAIRs review records; policy review arrangements	Provides an audit trail and supports assurance reporting, learning and continuous improvement	Information Governance Manager (DPO)