



Social Tenant Access to Information Requirements (STAIRs) Policy



Social Tenant Access to Information Requirements (STAIRs) Policy

Who's this for?	Tenants of Honeycomb Group Ltd
Version control – document status/implementation date	Version 1.0 28 September 2026
Consultation with stakeholders – please list	Customer Assurance Group 13 August 2026
Equality impact assessment if applicable & date	27 July 2026
Data Protection Assessment (by DPO) & date	27 July 2026
Date created	27 July 2026
Last update	N/A, new policy
Review required	September 2029 (3 yearly)
Owner (Executive Lead)	Executive Director Finance
Reviewed by:	Executive Team 19 Aug 26 Customer Services Committee 3 Sep 26
Approved by:	Board 21 Sep 26

Document Revision History

Version	Date	Description of Change	Author
New Policy			

Links to Associated Policies and Procedures

Data Protection Policy

1. Introduction and purpose

This policy sets out how Honeycomb Group will comply with the government's Policy Statement entitled the Social Tenant Access to Information Requirements, or "STAIRs", ensuring transparency, openness and tenant empowerment in being able to hold their landlord to account.

2. Policy aims and objectives

This policy aims to ensure that tenants are able to access information from their landlord. The policy sets out how Honeycomb Group will promote access to information through a formal publication scheme enabling tenants and tenants' representatives to access information proactively, and to support tenants to make information requests.

3. Scope

This policy applies to all employees and tenants of Honeycomb Group. STAIRs covers the publication of information, responding to information requests, reviews and complaints.

4. Regulatory Framework

This policy is based on the Social Tenant Access to Information Requirements ("STAIRs") introduced under the amended Transparency, Influence and Accountability ("TI&A") Consumer Standard issued by the Regulator of Social Housing ("RSH"). Under the "TI&A" Standard, Honeycomb Group, a Private Registered Provider ("PRP") is required to comply with the STAIRs Policy Statement. This sets out the requirements for PRPs to issue a Publication Scheme (Chapter 1), and secondly to respond to information requests from tenants and their representatives (Chapter 2).

STAIRs is designed to enable tenants and/or their designated representative to be able to access information which supports tenants to know more about how their services are delivered, either through information disclosed as part of a formal publication scheme or by responding to specific requests for information. Chapter 1 (requirement to introduce a Publication Scheme) takes effect from 1 October 2026. Chapter 2 (submission of Information Requests) takes effect from 1 April 2027.

5. The Requirements

STAIRs takes a principles-based approach in line with the RSH Consumer Standards. Key principles include: transparency, openness, accountability and tenant involvement in how services are delivered.

The STAIRs scheme has two key phases: Chapter 1 Publication Scheme; Chapter 2 Information Requests. Key requirements for each phase are set out below.

Information available under STAIRs is generally available free of charge. Where information is required in a non-electronic format, tenants will be required to contact Honeycomb Group's Data Protection Officer to discuss requirements.

Honeycomb Group is committed to ensuring that information is made available in a way that is accessible as possible for all our tenants.

6.1 Publication Scheme

Under the publication scheme within Chapter 1 of the Policy Statement, Honeycomb Group has proactively published information which they hold and which falls within one or more of the classes of information set out in Table 1 of the publication scheme.

A template for a Publication Scheme detailing:

- (i) what classes of information will be published; and
- (ii) how that information will be published is set out in Appendix 1 to this policy.

6.2 Information Requests

Chapter 2 of STAIRs sets out that tenants (or their designated representative) may make a request for relevant information. Relevant information is defined as information relating to the management of Honeycomb Group. The process for handling information requests is set out at Appendix 2 to this policy.

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

6. Out of Scope / Withheld Information

Honeycomb Group 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, Honeycomb Group will consider if the information comes within the classes of information set out in Table 1 of the Policy Statement. It may be necessary to redact documents prior to publication.

Appendix 1 includes categories of information which may be out of scope of STAIRs (this is not an exhaustive list).

When considering an information request under Chapter 2 Honeycomb Group will consider whether any information may need to be withheld or redacted in response to a request. Any withholding or redaction of information must be reasonable and in line with the principles set out in paragraphs 14 – 16 of the Government's Policy Statement on STAIRs.

Appendix 2 to this policy sets out how we will respond to requests for information and how we will consider "reasonableness" when assessing whether information should be withheld or redacted. If, on receipt of any response in relation to a request, if a tenant considers that information has been redacted or withheld without a reasonable basis for doing so, Honeycomb Group will refer them to the review process set out in section 7.

7. Review and Complaints Process

If a tenant considers that Honeycomb Group has not published information or responded to their request for information appropriately or they are otherwise dissatisfied with the handling of their request this will be handled by Honeycomb Group's Data Protection Officer. A request for a review should generally be made within 3 months of receipt of the original decision. The purpose of any review will be to assess:

- i. how we have responded to the request for information (for example, where we may not have provided information in an accessible format);
- ii. where we have not published relevant information that we may hold and which the tenant believes they may be entitled to;
- iii. where we have not complied with timelines for responding to a request and there is no good reason for us to have applied an extension; or
- iv. where we have either withheld or redacted relevant information from disclosure and the tenant disagrees with our decision and reasons for this.

We will carry out a review of how we have handled the request (an "internal review") and aim to respond to the complaint within 30 calendar days of receipt. It may be necessary in exceptional

circumstances to extend the timeline for a response, if this is necessary. We will let the tenant know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

If a tenant is not happy with our response to the review request, they are able to escalate their complaint directly to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme. The Ombudsman's complaints scheme is available at [Housing Ombudsman Scheme | Housing Ombudsman Service](#). Any complaint to the Ombudsman should generally be made within 3 months of the outcome of their review.

Only matters relating to STAIRs (i.e. the publication of information under Chapter 1 or information requests under Chapter 2) can be addressed as part of a STAIRs review process and then by complaint to the Housing Ombudsman. Please note that if a tenant's concern relates to an alleged breach of data protection legislation, they should inform us that their issue concerns a data protection complaint, which would then be dealt with via our usual complaints process for data protection matters.

8. Data Protection and Security

Where any information requested amounts to personal data or may not be identifiable personal data in isolation but could amount to identifiable personal data when combined with other information, this information may be withheld from disclosure in compliance with current data protection legislation.

Any requested information which amounts to personally identifiable data will not be disclosable under STAIRs but may be disclosed under current data protection laws as a subject access request, where information is sought by the tenant about themselves. Where we consider that a request amounts to request for personal data, we will process the tenants request in line with the current requirements for subject access requests and in accordance with current data protection law.

Our privacy notice on our [website](#) provides further information as to how we handle personal data.

9. Equality and Diversity

This policy promotes equality by giving all tenants equal access to social housing information.

10. Responsibilities

Overall responsibility for this policy lies with the Executive Team; day to day implementation of this policy lies with the Governance and Data Protection Business Partner.

All staff are required to familiarise themselves with the wording and obligations listed under this policy.

11. Monitoring and Review

This policy will be reviewed every 3 years or earlier where changes in legislation, regulation or business needs make this necessary. This will include seeking feedback and input by involved customers in order to support continuous improvement of service delivery.

The Executive Team will have oversight and monitor the outcomes of the policy operationally on a 6-monthly basis.

Date: September 2026

Appendix 1

1. Publication Scheme

This appendix sets out the basis on which Honeycomb Group will proactively publish information relating to the management of its social housing function. We are committed to being open and transparent about the way we work, the services we provide and the decisions we make.

The information covered by this scheme is included in the classes of information set out in Table 1, where this information is held by us. The table sets out a non-exhaustive list of classes of information we routinely publish, how to access them, and any applicable charges. Much of the information may already be freely available on our website.

We publish information within each class which is up to date and correct as at the date of publication and for the previous two financial years, unless stated otherwise.

We have provided below, Table 2, a list of the types of information which may be out of scope of Table 1 and are not subject to inclusion in the publication scheme.

This Scheme will be reviewed at least on an annual basis.

2. How will relevant information under STAIRs be published?

Information will be available on our website and will be regularly updated.

3. 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.

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

Charges may apply for additional copies in the following circumstances:

a. Printed or Hard Copy Documents

- Black and white printing/photocopying: 10p per sheet.
- Colour printing/photocopying: 20p per sheet.
- Binding or large volume printing: charged at cost.
- Postage and packaging: charged
- at Royal Mail rates.

b. Alternative Formats

If information is requested in an alternative accessible format (e.g., large print, Braille, audio format), we will provide the information free of charge. We will also provide one translated copy of any information you request free of charge.

c. No Charge for Inspection

Information may be inspected at our offices by appointment free of charge. Tenants are invited to contact us to arrange an appointment with their Neighbourhood Officer.

4. Tenant Feedback on this Publication Scheme

Tenants can provide suggestions for improvements to this Scheme:

Email Honeycomb Group's Data Protection Officer

Customer Assurance Group meetings

Contacting their Neighbourhood Officer

5. Reviews

Where tenants consider that we have not included information in our publication scheme, or that we have unduly redacted information which they consider ought not to be redacted, they have a right to request a review by emailing Honeycomb Group's Data Protection Officer. We will normally complete a review within 30 days.

Table 1 – Publication Scheme – Classes of Information

Honeycomb Group have a dedicated STAIRs [page](#) on our website which provides the details outlined in this table below and provides links to the specific areas within our website where information can be accessed.

Class of Information	Information Currently Published
Governance and decision making Information in this class is published as at the current date. Information relating to tenant consultations and meetings published for the current and previous two financial years.	▪ About us - Corporate Plan, Thriving Futures document setting out our mission statement, vision, values and corporate objectives ▪ Organisational Structure – a webpage providing information on our CEO and Executive Team. ▪ Board and Committees – webpages providing information on our Board, our committees and the overall company structure. ▪ Decision Making – constitutional document for Honeycomb Group, link to Financial Conduct Authority, Mutuals Register. Document showing how decisions are made. ▪ Tenant Consultation – policy document for Customer Engagement and link to tenant newsletters.
Finance and spending Information in this class is published for the current and previous two financial years.	▪ Audited accounts and financial statements – documents containing details about spending, grants and use of service charge revenue. ▪ Rents – document outlining how rents are set and webpage signposting ways on how to seek advice on managing money.
Housing stock management	▪ Corporate Plans and Objectives – Corporate Plan, Thriving Futures document includes information on our current corporate strategy and goals for Honeycomb Group. ▪ Policies – repairs and maintenance and customer involvement policy documents.
Performance Information in this class is published for the current and previous two financial years.	▪ Inspection outcomes and ratings – a webpage providing information on our currently regulatory judgement and link to RSH webpage for Honeycomb Group. ▪ Organisational Performance – Annual Report and Financial Statements, documents our performance both financial and organisational. ▪ Annual Reports to Tenants – a webpage sharing the annual reports to tenants in different formats. ▪ Tenant Satisfaction Measures – webpage link and documents on tenant satisfaction measures. ▪ Media Releases – a webpage link to news and latest information. ▪ Complaints – complaints handling, procedures, performance metrics and service standards. Complaints webpage including current complaints policies, leaflets, annual report and self-assessment.

Housing Services and tenant liaison Information in this class is published as at the current date.	▪ Description of services, advice and guidance for tenants – links to webpages on our support, services, current policies, customer involvement and advice about their property. Further links to Glow, Concrete and Revival are included.
Lists and registers Information in this class is published for the current and previous two financial years.	▪ Statutory Registers - for information held in registers, explained on the webpage with a link on information about tenants keeping staying safe in their home and details regarding Damp and Mould, Asbestos, gas, electrical, lifts, water and fire safety. Reference to adaptations is also mentioned and for tenants to get in contact if they require further information
Social housing management	▪ Current policies – all policy documents included via webpage.

Table 2 – Publication Scheme – Information out of Scope

Categories of Information out of scope	Examples of types of information (not an exhaustive list)
Internal business or commercial activities	▪ Contracts or agreements unrelated to the provision of housing management services (eg payroll services). ▪ HR policies unrelated to social housing management (e.g. disciplinary policy). ▪ Finance policies governing day to day business operations unrelated to the provision of housing management services. ▪ Investment strategies relating to non-social or private housing. ▪ Information which relates to internal discussions and the development of internal policy and strategy before board approval (“pipeline” information).
Matters decided by local authorities	▪ Housing allocations. ▪ Homelessness assessments. ▪ Housing benefit or council tax-related decisions. ▪ Planning applications and planning enforcement actions.
Non-social housing management function	▪ Service charges for non-social housing. ▪ Commercial lease management. ▪ Repairs or safety data for homes not owned by Honeycomb Group
Property that is not social housing	▪ Leasehold properties. ▪ Shared ownership schemes where shared owner has staircased to own 100% of property equity. ▪ Shops; offices; community centres. ▪ Storage units or other non-residential lets.

	▪ Any build-to-rent or for-profit schemes held separately from the PRP.
Wider activities unconnected with social housing	▪ Group level commercial ventures – e.g.: renewable energy subsidiaries; trading companies; joint ventures for private sale developments. ▪ Care and support contracts delivered on behalf of local authorities (for care and support only). ▪ Commercial investment or treasury activities.

Appendix 2

1. Responding to Information Requests

1.1 Who can make requests?

Honeycomb Group will respond to Information requests that are made either by a registered tenant with us, or by their designated representative (the scheme is not open to either former or prospective tenants). Honeycomb Group will only respond to requests where it can confirm the identity of the requesting tenant and their representative (where appointed). There are no restrictions on tenants as to whom they may choose as their representative.

We will accept requests that are made in writing, including either by email, text message and social media, as long as we can identify who the person is. The request does 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 tenant.

We recognise that certain tenants may require additional support to make a request and we will ensure that appropriate arrangements are in place to support all tenants to be able to exercise their rights under STAIRs. Examples of additional support might be working with a trusted representative, advocate or support worker to act on the tenant’s behalf, using alternative communication methods where necessary such as telephone or in person by allowing requests to be made verbally with staff assistance to complete required forms, providing them with additional time to consider information and submit requests, by making reasonable adjustments for tenants with physical, sensory impairments or mental health conditions, supporting tenants with literacy, learning disabilities or cognitive impairments.

1.2 How long will it take us to respond?

We will provide an acknowledgement of receipt of requests within 5 working days of receipt. We will respond to the request within 30 calendar days from receipt of the request, or where the request requires clarification, 30 days from receipt of the clarification.

Honeycomb Group will take reasonable steps to assist tenants 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 Honeycomb Group will inform the tenant 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 in providing a response, we will ensure that we provide the tenant with a reason for the delay together with our best estimate as to when they may be likely to receive a response.

1.3 Refusing to respond to Information Requests

We may refuse to respond to an information request, where:

- it is reasonable to withhold the information from disclosure;
- disclosure of the information may cause harm (where we have reasonably balanced the factors favouring disclosure against the likelihood of any harm arising from that disclosure);
- the tenant’s identity (or that of your representative) cannot be established;
- the meaning of the request is not clear and they have not responded to our reasonable efforts to seek clarification;
- the information requested is excluded on the basis that it is not relevant information (i.e. does not come within the scope of an information request under STAIRs);
- the work involved in responding to the request would exceed 18 hours of staff time;

- the request is excessive, in that it is repeated, for example where the same tenant, or multiple tenants acting together, submit the same or substantially similar requests without a material change in circumstances or without providing a reasonable basis for the information to be reconsidered; or

*A request will not be regarded as repeated simply because a tenant seeks clarification, requests additional information arising from a previous response, or submits a new request concerning a different matter.

*In determining whether a request is excessive or repeated, we will consider all relevant circumstances, including the purpose of the request, the information already provided, any change in circumstances since a previous request, and our obligation to support tenant transparency and accountability. Each case will be considered on its own merits.

- the request is offensive or communicated in an abusive manner or is clearly intended to otherwise cause disruption to our organisation.

We may also redact information where it is appropriate and reasonable to do so.

1.4 What does “reasonable” mean when responding to requests?

When considering whether it is reasonable to withhold any information in response to a request we are required to have “due regard to” freedom of information and data protection laws (and any other relevant statutes). We are also required to balance factors favouring disclosure against the likelihood of any harm arising from the disclosure.

In having “due regard” we will ensure that we give proper consideration to whether the information falls within a class of information under freedom of information and data protection laws and whether releasing the relevant information could cause harm.

“Due regard” means that we must consider or take account of a legal principle or legislation, but it does not mean that we have to follow that principle automatically. We will ensure that we are able to justify why we consider that protected class under FOIA (or other relevant laws) may apply to the request and record our reasoning.

We will start from the presumption that the information should be disclosed in response to a request unless the information is such that the factors in favour of withholding (or redacting) the information outweigh the benefits of making the information available.

Factors we will take into account when considering the likelihood of harm being caused by the disclosure will include:

- Type of harm – physical, mental, financial, or operational / commercial.
- Severity – how serious could the harm be?
- Likelihood – is harm speculative, possible, or reasonably likely?
- Harm to third parties – e.g., other individuals, third party organisations, whether or not the information is in the wider public interest to disclose or withhold.

For example, there is often a public interest reason in withholding information on the basis that there is a:

- Need to ensure confidentiality around formulation of decisions and pipeline discussions or protect a negotiating position.
- Need to ensure value for money and maintain competitive position in a market.
- Need to ensure the health and safety of any individual or prevent disclosure of information which could prejudice any investigation.

We are also required to take into account that where the relevant information was provided by or relates to a third party, we will be required to consider the views of that third party regarding the likelihood of any harm. When assessing the risk of harm, our approach is that the reference to “third party” here means any third party or individual (i.e. not solely a body responsible for the management of social housing instructed on our behalf).

In addition, we are not obliged to disclose information under STAIRs where we already provide disclosure of relevant information pursuant to other statutory provisions (for example, we are legally required to provide to the Financial Conduct Authority information about our corporate activities, such as the filing of our annual return).

1.5 What other factors will we take into account when disclosing information?

When considering whether or not to disclose relevant information we will not take into account the identity of the tenant nor any purpose to which that information may be put as relevant factors as to whether the information ought to be disclosed. Nor will we take account of any reputational risk or negative public interest for us which may be either caused or inferred by reason of any disclosure. Honeycomb Group will ensure that information is published in the spirit of openness and transparency as laid down by the scheme.

Where we either withhold information from disclosure, or we provide information but with redactions we will explain our reasons for this as part of our response. If it is necessary to extend the timelines for a response where we need to consider whether withholding or redacting information is required, we will let the tenant know as soon as possible, together with our likely timeline to provide them with a response.

When disclosing information, we will take all reasonable steps to ensure that information is provided in a format which is accessible to the tenant.