STAIRs Procedure

Directorate: Governance, Risk & Assurance
Issue Date: September 2026
Review Date: February 2028
Version: 1

Introduction

This procedure guide supports the Salix Homes' approach to the Social Tenants Access to Information Requirements Scheme (STAIRS).

The following procedures are detailed within this document:

1. **Publication Scheme ..... pg. 02**
   - 1.1. How will relevant information under STAIRS be published?
   - 1.2. Formats other than online
   - 1.3. Customer Feedback on this Publication Scheme
   - 1.4. Reviews and Complaints
2. **Publication Scheme – Classes of Information ..... pg. 03**
   - 2.1. Classes of Information Publication Table
3. **Responding to Access to Information Requests ..... pg. 05**
   - 3.1. Who can make requests
   - 3.2. Response times
   - 3.3. Obtaining information from third parties
   - 3.4. Refusing information requests
   - 3.5. What does "reasonable" mean when responding to requests
   - 3.6. Other factors to be taken into consideration
   - 3.7. Review and Complaints
4. **STAIRs Flowchart ..... pg. 09**

Related Policies

The following policies are related to this document:

- Social Tenants Access to Information Requirements Policy
- Data Protection Policy

1. Publication Scheme

This procedure sets out the basis on which Salix Homes 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 (see table 1), where this information is held by us. The table sets out a non-exhaustive list of classes of information that we routinely publish, how to access them, and any applicable charges. Much of the information is already freely available on the Salix Homes 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 otherwise stated. This Scheme will be reviewed at least on an annual basis

1.1. How will relevant information under STAIRS be published?

Information will be available on the Salix Homes website at www.salixhomes.co.uk and will be regularly updated.

1.2. 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:

1. Printed or Hard Copy Documents

- Black and white printing/ photocopying: [8p] per sheet.
- Colour printing/photocopying: [15p] per sheet.
- Binding or large volume printing: charged at cost.
- Postage and packaging: charged at Royal Mail rates.

2. 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.

Where information is requested in other languages, we will work with customers to provide the information in an appropriate format. This may include one translated copy of any information requested free of charge.

3. No Charge for Inspection

Information may be inspected at our offices by appointment free of charge. Customers should contact us to arrange an appointment.

1.3. **Customer feedback on this Publication Scheme**

Customers can provide suggestions for improvements to this Scheme via:
- MySalix
- Email to datarequests@salixhomes.co.uk
- Tenant panels / meetings or via housing management colleagues.

1.4. **Reviews and Complaints**

Should a customer 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 should request a review at datarequests@salixhomes.co.uk. We will normally complete a review within 30 days.

2. Publication Scheme – Classes of Information

2.1. The table below indicates the classes of information that Salix Homes currently publishes and where this information is held. This list is not exhaustive and may be subject to change.

Class of Information	Published Information
Governance and decision making	Information regarding: • About Salix Homes (About Us) • Group Structure • The Board and Committees • The Executive Team • The work of the Board • Key documents relating to Salix Homes e.g. Corporate Plan, Annual Review etc Is available on Salix Homes' website
Finance and spending	Information regarding: • Salix Homes annual audited accounts and financial statements

	Are available on Salix Homes' website
Housing stock management	Information regarding: • Salix Homes Corporate Plan and Annual Review • Building safety • Repairs and maintenance • Net Zero • Asset management Is available on Salix Homes' website
Performance	Information regarding: • Quarterly Key Performance Indicators • Quarterly and Annual Tenant Satisfaction Measures • Annual Review • Complaints – procedures, performance, compliance with the Complaints Handling Code • Information requests and data protection Is available on Salix Homes' website
Housing Services and tenant liaison	Information regarding Salix Homes housing management services and support for customers is available on Salix Homes' website
Lists & registers	Is available on Salix Homes' website
Social housing management	Policies and strategies relating to the management of Salix Homes properties are available on Salix Homes' website.

2.2. Salix Homes considers the following as out of scope of STAIRS:

- Internal business or commercial activities – e.g. contracts or agreements unrelated to housing management services, HR policies unrelated to housing management services, finance policies related to day to day business operations, information relating to internal discussions and the development of internal policy and strategy
- Matters decided by local authority partners – e.g. housing allocations, homelessness assessments, housing benefit or council tax related decisions, planning applications or planning enforcement actions
- Non social housing management function – e.g. service charges for non social housing, commercial lease management, repairs or safety data for market rent homes, private rented sector portfolios manged for profit
- Property that is not social housing – e.g. leasehold properties, shared ownership schemes where the shared owner has staircased to owning 100% of the equity, shops/ offices
- Wider activities unconnected to social housing – e.g. joint ventures, commercial investment or treasury activities.

2.3. Customers and their designated representatives may request a review of the out of scope list.

3. Responding to Access to Information Requests

This procedure sets out the basis on which Salix Homes will consider and respond to Access to Information requests. We are committed to being open and transparent with customers, and will consider each request on its own merit according to the spirit of the scheme and the specific requirements of the scheme.

3.1. Who can make requests?

3.1.1. Salix Homes will respond to Information requests that are made either by a registered tenant with us (i.e. a current tenant, licensee, a shared owner owning less than 100% of the equity of their property, and any other person in a landlord-tenant relationship with Salix Homes) or by their designated representative.

3.1.2. Tenants are required to identify their representative to Salix Homes (even if an Authority to Act is in place) and provide a signed form of authority confirming that they are acting on behalf of the tenant. Salix Homes may make checks regarding the representative to confirm that they are acting on behalf of the tenant making the request.

3.1.3. The Access to Information scheme is not open to either former or prospective tenants. Family members or others living at the property who are not named tenants are not able to make requests under STAIRS, unless as the tenants designated representative.

3.1.4. In the spirit of openness and transparency, Salix Homes will, however, endeavour to consider all requests and may at its discretion respond to a request if it is considered to be reasonable to do so.

3.1.5. Salix Homes 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 whom a customer may choose as their representative.

3.1.6. Access to Information requests should be made in writing – to include letter, email, text message and social media. A 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 requestor and they provide a valid address for correspondence.

3.1.7. Salix Homes will provide reasonable efforts to support to customers to make a clear and valid request and we will ensure that appropriate arrangements are in place to support all tenants to be able to exercise their rights under STAIRs.

3.1.8. On receipt of a request, Salix Homes will consider whether the request amounts to a request for personal data (a Data Subject Access Request – DSAR), a request for non-personal data via STAIRS, a complaint or a housing management query / "business as usual" query. Salix Homes will seek to signpost the requestor to the most appropriate business stream for processing.

3.2. Response times

3.2.1. Salix Homes will provide a written acknowledgement of receipt of the request within 3 working days of receipt. If necessary, Salix Homes will engage with the tenant to clarify the information being requested. As noted in section 3.1.8, following clarification, Salix Homes may suggest a different route for responding to the request. The reasons for this will be made clear to the requestor.

3.2.2. Salix Homes will seek to respond to the request within 30 calendar days from receipt of the request. If confirmation of ID or where the additional clarification of the request is required, Salix Homes will seek to respond within 30 days from receipt of the ID confirmation or clarification.

3.2.3. Salix Homes will maintain a register of all requests and record the dates of receipt, clarification or verification to ensure that the requests can be responded to in the correct timeframe.

3.2.4. Salix Homes 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 Salix Homes will inform the requestor at the earliest opportunity.

3.2.5. 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 requestor with a reason for the delay together with our best estimate as to when the response will be provided.

3.3. Obtaining information from third parties

3.3.1. It may be the case that the requested information is held by a third party responsible for the management of social housing on our behalf. If this is the case Salix Homes will use all reasonable endeavours to obtain the information, taking account of our duty to comply with the requirements balanced against the need for a proportionate approach and the availability of resources. We will keep logs of our contacts where it is necessary to reach out to third parties for the information.

3.4. Refusing Information Requests

3.4.1. 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 identity of the customer (or their representative) cannot be established;
- The meaning of the request is not clear and responses to our reasonable efforts to seek clarification have not been met;
- 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 information being requested involves the creation of "new" information;
- The work involved in responding to the request would exceed 18 hours of staff time;
- The request is excessive, in that it is repeated (including where we receive repeated requests from multiple tenants acting in coordination or seeking the same information); or
- The request is offensive or communicated in an abusive manner or is clearly intended to otherwise cause disruption to our organisation

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

3.4.3. In all cases, Salix Homes will confirm the reason for the refusal to the requestor and confirm the next stages should the requestor remain unhappy with the response. The reason for the refusal will be recorded on the register.

3.5. What does "reasonable" mean when responding to requests?

3.5.1. When considering whether it is reasonable to withhold any information in response to a request, Salix Homes will 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.

3.5.2. In having "due regard" Salix Homes must ensure that it gives 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. Providers should be able to justify why they consider that protected class under FOIA (or other relevant laws) may apply to the request and record their reasoning.

3.5.3. Salix Homes 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.

3.5.4. 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.

3.5.5. Salix Homes will also consider whether there is a public interest reason for withholding information on the basis of there being 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

3.5.6. Where the relevant information was provided by or relates to a third party, Salix Homes will 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).

3.5.7. Salix Homes 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 Companies House information about our corporate activities, such as the filing of our annual return).

3.6. Other factors to be taken into consideration

3.6.1. When considering whether or not to disclose relevant information, Salix Homes 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.

3.6.2. Salix Homes 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.

3.6.3. 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 requestor know as soon as possible, together with our likely timeline in providing them with a response.

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

3.7. Review and Complaints

3.7.1. In the event a tenant remains unhappy with the response to their Access to Information request, they can request a review. This is separate to Salix Homes complaints procedure.

3.7.2. The review will be completed within 30 calendar days of receipt of the request. The review will not be completed by the officer to who responded to the original request.

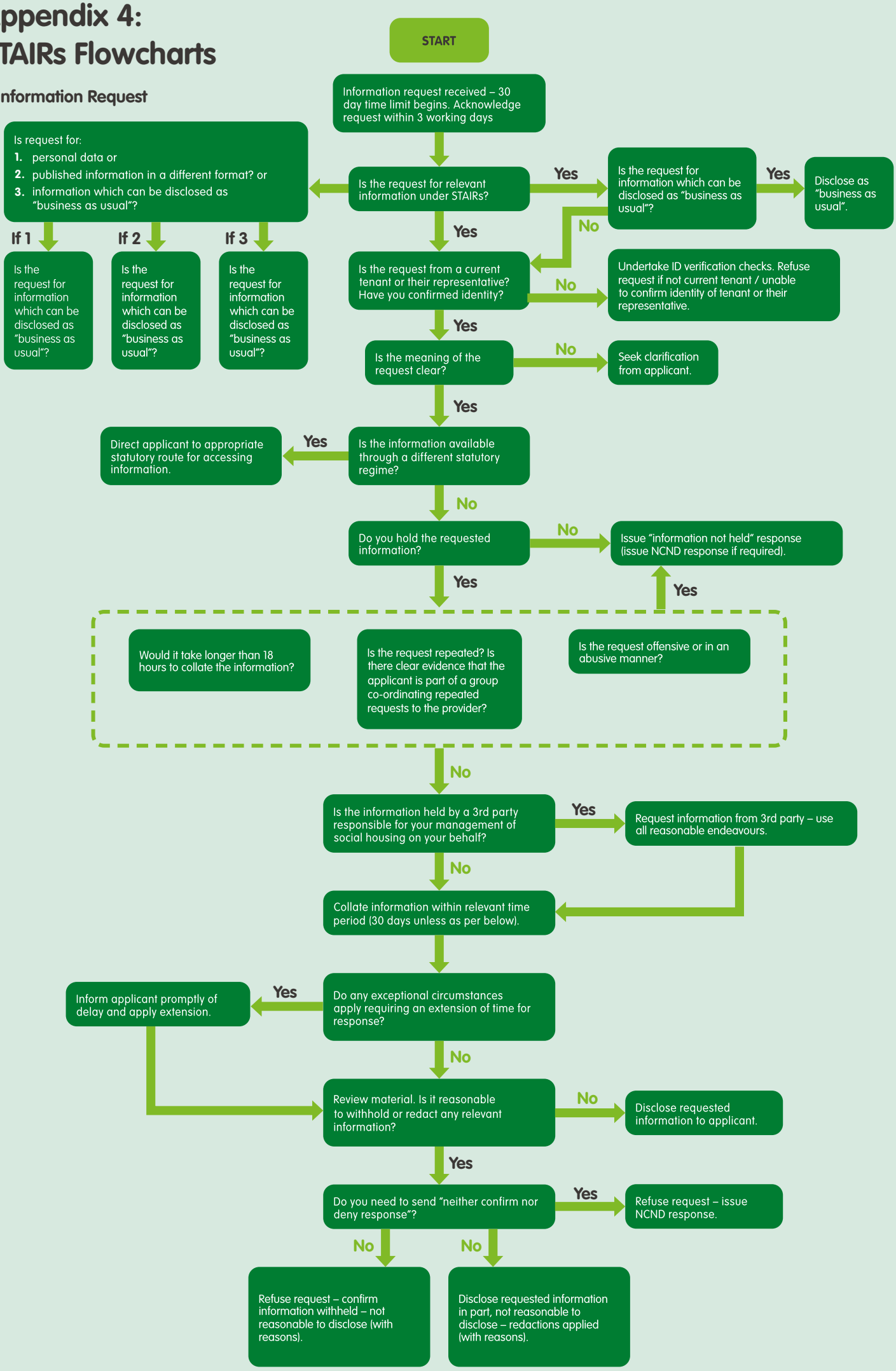
3.7.3. Depending on the findings of the review, Salix Homes may decide to:

- Uphold its original position
- Publish information not previously published
- Provide information that had previously been withheld (either in full or redacted)
- Acknowledge failings in the handling of an information request and take action to put things right.

3.7.4. If a requestor remains unhappy with how their response has been handled, they have the right to complain to the Housing Ombudsman. Responses to review requests should inform tenants of their right to access the Scheme. In the event that the complaint relates to an allegation of data protection legislation, the Housing Ombudsman may not consider the complaint and it should be passed to the ICO or other regulator as appropriate.

Appendix 4: STAIRs Flowcharts

1. Information Request



2. STAIRs Review Process Flowchart

