Social Tenant
Access to Information Requirements Policy

Directorate: Governance, Risk & Assurance
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1. Introduction

1.1. This policy aims to ensure that tenants are able to access information from their landlord. The policy sets out how Salix Homes will promote access to information through a formal publication scheme enabling customers and their designated representatives to access information proactively, and to support them to make information requests.

2. Policy Statement

2.1. This policy sets out how Salix Homes will comply with the government's Social Tenant Access to Information Requirements, or "STAIRs" (as set out on the Policy Statement of the same name) and included within the Transparency, Influence and Accountability ("TI&A") Consumer Standard as issued by the Regulator of Social Housing ("RSH").

2.2. The policy and associated documents set out how Salix Homes responds to the requirements for issuing a Publication Scheme and how it responds to information requests from tenants and their representatives – to support tenants to know more about how their services are delivered.

2.3. Salix Homes' Publication Scheme and Access to Information procedure will ensure transparency, openness and empowerment to enable customers to hold their landlord to account.

3. Definitions

3.1. Key definitions, terms used throughout this policy and associated documents are:

STAIRS	Social Tenants Access to Information Requirements
Publication Scheme	The basis on which Salix Homes proactively publishes information relating to the management of our social housing function.

Access to Information Scheme	The basis for Salix Homes to respond to information requests made by either a registered tenant of Salix Homes or their designated representative.
Tenant	A registered tenant of Salix Homes. This includes tenants, licensee a shared owner owning less than 100% of the property equity and any other person in a landlord-tenant relationship with Salix Homes. This does not include prospective tenants or those whose tenancy has ended. Family members or others living at the property that are not named tenants cannot make requests.
Designated Representative	A person who is acting on behalf of the registered tenant.
Subject Access Request (SAR)	Individuals have the right to request personal information held about them (see Data Protection Policy & Procedure).
RSH	Regulator of Social Housing – the regulatory body for registered providers of social housing. The RSH publish their expectations of providers through the Regulatory Standards, which include the Consumer Standards and the Transparency, Influence & Accountability Standard.
Relevant Information	Information relating to the management of a Registered Provider's social housing

4. Policy Principles

4.1. Salix Homes' approach to STAIRs is principles-based in line with the RSH Consumer Standards and the associated Policy Statement. Key principles include: transparency, openness, accountability and tenant involvement in how services are delivered.

4.2. Salix Homes will actively promote STAIRS, through its website, tenant communications, customer newsletters and engagement forums.

4.3. The approach follows two elements – a Publication Scheme and an Access to Information Scheme.

4.4. **Publication Scheme**

4.4.1. Under the Publication scheme, Salix Homes will proactively publish information which it holds and falls within one or more of the classes of information as set out in the publication template (STAIRs procedure).

4.4.2. How this information will be published is set out in the STAIRs procedure..

4.4.3. In line with the Policy Statement, Salix Homes will aim to be open and transparent in relation to the information being published.

4.4.4. The information being published will be kept under review, and updated as appropriate – for example, in consultation with customer groups or following multiple requests for certain types of information. Customers will be routinely consulted on the accessibility of the documents being published to ensure that the information is easily available and understandable.

4.5. **Access to Information Scheme**

4.5.1. Under Salix Homes' Access to Information Scheme, tenants (or their designated representative) may make a written request for "relevant information" to Salix Homes.

4.5.2. Salix Homes will support customers in making written requests.

4.5.3. Salix Homes will seek to proactively respond to requests irrespective of the reasons for the request or how the information may be used following disclosure, and should disregard any perceived adverse impact or negative publicity which may be caused by the disclosure

4.5.4. The procedure for responding to an Access to Information request is outlined in the STAIRs procedure.

4.5.5. The procedure also provides details on how Salix Homes will validate requests, timescales for responding and extensions. It also identifies the grounds where information will not be disclosed - such as where the information amounts to a protected class of information under freedom of information or data protection (or other) laws or where the harm caused by the disclosure would outweigh the benefit in the provider disclosing the information.

4.5.6. In all cases, Salix Homes will explain the reasons for not providing information.

4.6. Salix Homes will maintain a log of all information requests and timelines for responding to requests for reporting and accountability purposes. The Audit & Risk Committee will maintain oversight of requests made.

4.7. Information available under STAIRs is generally available free of charge. Where information is required in a non-electronic format, requirements should be discussed

with the Governance team. Salix Homes is committed to ensuring that information is made available in a way that is accessible as possible for all tenants.

5. Out of scope/ Withheld information

5.1. Salix Homes 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, Salix Homes will consider if the information comes within the classes of information set out in its Publication Scheme (or Table 1 of the Policy Statement). It is accepted that it may be necessary to redact documents prior to publication.

5.2. Other categories of information which may be considered out of scope of STAIRs are listed in Salix Homes' publication template.

5.3. When considering an information request, Salix Homes 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 Policy Statement. The STAIRs procedure sets out how Salix Homes will respond to requests for information and how it will consider "reasonableness" when assessing whether information should be withheld or redacted. A separate review process is in place if, on receipt of any response in relation to a request, it is considered that information has been redacted or withheld without a reasonable basis for doing so (see section 6).

6. Review and Complaints Process

6.1. If a registered customer or a delegated representative feels that Salix Homes has not published information or responded to their request for information appropriately or are otherwise dissatisfied with the handling of their request, they can request a review by contacting the Governance team. 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 Salix Homes have responded to the request for information (for example, where we may not have provided information in an accessible format);
ii. where Salix Homes have not published relevant information that we may hold and which the requestor believes they may be entitled to;
iii. where Salix Homes have not complied with timelines for responding to the request and there is no good reason for us to have applied an extension;
iv. where Salix Homes have either withheld or redacted relevant information from disclosure and the requestor disagrees with our decision and reasons for this.

6.2. Salix Homes will carry out a review of how the request has been handled (an "internal review") and will 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 customer know at the earliest opportunity. Any extension issued will be reasonable and kept to a minimum.

6.3. If a customer is not happy with the 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 www.housing-ombudsman.org.uk/landlords-info/the-housing-ombudsman-scheme/. Any complaint to the Ombudsman should generally be made within 3 months of the outcome of the 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.

6.4. If the concern relates to an alleged breach of data protection legislation, Salix Homes be should informed that the issue concerns a data protection complaint, which would then be dealt with via our usual complaints process for data protection matters.

7. Data Protection and Security

7.1. Data protection laws are directly applicable to housing providers. This means that 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 data protection laws.

7.2. Any requested information which amounts to personally identifiable data will not be disclosable under STAIRs but may be disclosed under data protection laws as a Subject Access Request (SAR), where information is requested by the tenant about themselves.

7.3. Where it is considered that the request amounts to a request for personal data, Salix Homes will process the request in line with the Data Protection Policy and Procedure available on the Your Information Rights section of the website. For further information as to how we handle personal data, please see our privacy policy.

8. Monitoring / Performance / Targets

8.1. The Governance Team will retain oversight of the implementation of this policy, in relation to recording the publication of information and maintaining the central register of access to information requests.

8.2. Oversight of STAIRs summary of access to information requests, and analysis of themes will be presented to the Audit & Risk Committee and Customer Committee on a six-monthly basis.

8.3. This policy and procedures relating to STAIRS will be reviewed regularly (initially bi-ennially) to ensure accuracy and compliance.

8.4. Compliance with the requirements of STAIRS will be subject to internal audit reviews.

9. Roles / Responsibility

9.1. Overall responsibility for this policy lies with the Chief Executive Officer.

9.2. The Executive Team and Senior Leadership Team are responsible for ensuring that all officers and colleagues are aware of the purpose and requirements of this policy and that it is being followed at all times in the day-to-day activities of the organisation.

9.3. All managers are required to familiarise themselves with the wording and obligations within this policy, and to ensure that the members of their teams are aware and following the requirements in their day-to-day activities.

9.4. All colleagues are required to familiarise themselves with the wording and obligations within this policy.

10. Legal / Regulatory Links

10.1. This Policy aligns with the requirements of:

- The Social Housing Regulations Act 2023
- Transparency, Influence & Accountability Standards, as published by the Regulator of Social Housing - this policy is based on the Social Tenant Access to Information Requirements introduced under the amended Transparency, Influence and Accountability (“TI&A”) Consumer Standard issued by the Regulator of Social Housing (“RSH”)

11. Equality, Diversity and Inclusion

11.1. Salix Homes is committed to promoting and embedding a culture of equality, diversity and inclusion (EDI) within our workplaces and the communities we serve.

- Equality is about ensuring that every individual has an opportunity to make the most of their lives and talents;

- Diversity is recognising difference and responding positively to those differences;
- Inclusion is about creating an environment where our services and employment opportunities are accessible to all.

11.2. We are committed to meeting our obligations and duties under the Equality Act 2010 and to promoting equal opportunities both in the provision of services and in our employment practices. We will consider all the protected characteristics of the Act which are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Race
- Religion or belief
- Sex
- Sexual orientation
- Pregnancy and maternity

11.3. We also recognise that socio-economic background is an area where inequalities exist and commit to addressing this disadvantage and inequality in our communities where able to do so.

11.4. We are also mindful of our duties under the Public Sector Equality Duty, which is to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

11.5. Where reasonable to do so, Salix Homes will make any reasonable adjustment to ensure compliance with the requirements of STAIRS and officers will support customers in making requests for information and making published information accessible/ understandable.

12. Related Documents

12.1. This Policy should be read in conjunction with/ and or links to the following documents:

- The Transparency, Influence & Accountability Standard
- STAIRS Policy Statement
- Data Protection Policy & Procedure