

Transparency & Access to Information Policy

Supporting compliance with the Social Tenant Access to Information Requirements (STAIRs)

Audience:	Customers, colleagues, stakeholders, Board members
Policy Owner:	Executive Director of Governance & Compliance
Policy Lead:	Head of Governance
Approved by:	Executive Team
Approved date:	01 September 2026
Next review date:	01 September 2027

1. Context, purpose and scope of the policy

Context

The Social Housing (Regulation) Act 2023 introduced new transparency and accountability requirements for registered providers of social housing through the Social Tenant Access to Information Requirements (STAIRs).

From October 2026, housing associations are required to proactively publish specified information relating to the management of social housing. From April 2027, tenants will also have the statutory right to request housing management information from their landlord.

These requirements reflect increasing expectations from tenants, the Housing Ombudsman and the Regulator of Social Housing regarding openness, accountability and access to information.

This policy supports Moat's approach to meeting these requirements consistently, transparently and in a way that strengthens customer trust and organisational accountability.

Purpose

This policy sets out how Moat will:

- make information relating to the management of social housing accessible to customers
- maintain a structured publication scheme
- support customers to access information about housing services and decision-making
- manage information requests fairly and consistently
- ensure decisions to withhold or redact information are reasonable, proportionate and legally compliant

Scope

This policy applies to:

- all colleagues involved in the management of social housing information
- information relating to the management of Moat's social housing homes and services, including information held by contractors, managing agents or other organisations acting on Moat's behalf where relevant to the management of social housing.

The statutory rights provided by STAIRs apply to tenants as defined within the STAIRs framework. We may provide information to other customers where appropriate as part of our wider commitment to transparency, but this does not extend the statutory STAIRs framework or associated rights to customers who fall outside its scope.

This policy covers:

- proactive publication of information
- customer access to information
- information request handling
- principles for withholding or redacting information
- governance and oversight arrangements relating to transparency and information access.

This policy does not replace:

- Freedom of Information obligations applying to local authorities
- existing complaints processes, noting that complaints relating specifically to STAIRs are handled through the STAIRs review process set out in this policy and supporting procedure
- insurance, safeguarding, legal disclosure or other statutory or operational processes.

This policy does not limit individuals' rights under data protection legislation. Requests for personal data will continue to be handled through the Subject Access Request process.

Requests for information relating to the management of social housing will be considered under the STAIRs framework where appropriate.

Where requests are more appropriately managed through another statutory or operational route, including the Subject Access Request process, complaints process or other legal process, we will explain this to customers and direct them to the appropriate route.

Operational processes for managing requests are set out within the supporting Transparency and Access to Information Procedure.

2. Definitions

- **STAIRs:** Social Tenant Access to Information Requirements introduced under the Social Housing (Regulation) Act 2023.
- **Customer:** A person who is or has been in a landlord/customer relationship with Moat, including tenants, leaseholders, shared owners, licensees and others occupying or receiving services from homes owned or managed by Moat.
- **Tenant:** For the purposes of STAIRs, a tenant or other occupier of social housing, including a licensee and a shared owner who owns less than 100% of the equity in their home.
- **Publication scheme:** The structured approach used to publish information required under STAIRs.
- **Relevant information:** Information relating to the management of social housing services as defined within the STAIRs. This does not automatically include personal data, legally privileged information or information managed through alternative statutory processes.
- **STAIRs information request:** A request made under STAIRs by a tenant or their designated representative for information relating to the management of social housing.
- **Redaction:** The removal or obscuring of information before disclosure where lawful and appropriate. Redaction will only be applied where there is a clear and lawful basis to do so, such as protecting personal data, third-party confidentiality, legal professional privilege, or the safety of individuals.
- **Designated representative:** A person authorised to act on behalf of a tenant in relation to STAIRs.
- **STAIRs review:** A reconsideration by Moat where a tenant is dissatisfied with the handling or outcome of a STAIRs information request or believes that information required under the publication scheme has not been published.

3. How this policy supports our strategy

Corporate Strategy

This policy supports our commitment to being a trusted, accountable and evidence-led landlord by improving transparency and making it easier for customers to access information about how services are delivered and decisions are made.

It particularly supports the following strategic priorities:

- Safe, affordable homes customers can trust
- A confident, capable organisation delivering consistently.

By improving access to information and strengthening accountability, this policy supports greater customer confidence in Moat's services and decision-making.

Customer Strategy

This policy strengthens customer voice and accountability by improving access to information and supporting greater transparency around service delivery, performance and customer outcomes.

Data and Technology Strategy and Data Governance Framework

This policy supports improved information governance, clearer ownership of information and greater confidence in the quality, accessibility and consistency of published information.

Value for Money Framework

Improving transparency and access to information supports earlier resolution of issues, strengthens organisational accountability and reduces inefficiencies caused by fragmented or inaccessible information.

4. Policy principles

We will:

- be open and transparent in how we share information relating to the management of social housing
- make information accessible and easy for customers to understand wherever reasonably practicable
- balance transparency with our legal responsibilities relating to confidentiality, privacy and safety
- be clear and honest about what information we can and cannot share and why
- manage access to information fairly, consistently and proportionately
- use insight from customer feedback, complaints and regulatory learning to improve transparency and access to information.

5. Aims and objectives

Aim: To strengthen transparency, accountability and customer trust by improving access to information relating to the management of social housing.

Objectives:

1. Establish and maintain a compliant STAIRs publication scheme.
2. Improve accessibility of housing management information.
3. Strengthen governance and ownership of published information.
4. Ensure information requests are handled consistently and within statutory timescales.
5. Support compliance with consumer regulation requirements.

6. Policy actions

Objective 1: Establish and maintain a compliant STAIRs publication scheme

- We'll maintain a structured publication scheme covering information required under the Social Tenant Access to Information Requirements.
- We'll regularly review published information to ensure it remains accurate, accessible and up to date.
- We'll define clear ownership for published information to support accountability and consistency.
- We'll make published information available through customer-facing channels, ensuring it is accessible, easy to find and clearly signposted.

Objective 2: Improve accessibility of housing management information

- We'll provide clear guidance to help customers understand what information is available and how it can be accessed.
- We'll support customers to request information where additional support or reasonable adjustments are needed.
- We'll aim to present information in plain language and accessible formats wherever reasonably practicable.
- We'll review customer feedback, complaints and requests to identify where information is difficult to access or understand and use this insight to improve how information is provided.

Objective 3: Strengthen governance and ownership of published information

- We'll maintain clear governance arrangements for oversight of STAIRs compliance and publication requirements.
- We'll establish clear ownership and arrangements for reviewing, updating and assuring information published under the publication scheme.
- We'll use insight from complaints, Ombudsman findings and regulatory developments to improve our approach to transparency and information management.

Objective 4: Ensure information requests are handled consistently and within statutory timescales

- We'll maintain a clear process for receiving, recording and responding to STAIRs information requests from tenants and their designated representatives.

- We'll assess each request to determine whether it falls within the statutory scope of STAIRs, including whether the applicant is eligible to make a request under that STAIRs framework, or whether it should be managed through another statutory or operational process.
- We'll support colleagues to understand their responsibilities when managing information requests.
- We'll acknowledge requests promptly and respond within the timescales set by the STAIRs framework, explaining where additional time is required.
- We'll apply lawful and proportionate approaches where requests are unclear, repeated, abusive or otherwise fall outside the scope of STAIRs.
 - Decisions to withhold or redact information will be reasonable, necessary and proportionate and based on clear lawful grounds.
 - Where a tenant is dissatisfied with the handling or outcome of a STAIRs information request, or believes information required under the publication scheme has not been published, they can request a STAIRs review.
- We'll carry out STAIRs reviews within the timescales set by the STAIRs framework and explain where additional time is required.
 - Where we do not respond to a STAIRs information request or complete a STAIRs review within 30 calendar days, or where a tenant remains dissatisfied following a STAIRs review, they may refer the matter to the Housing Ombudsman in accordance with the STAIRs framework.
- We'll explain the tenant's right to refer a matter to the Housing Ombudsman and how to do so as part of our response or review process.
- We'll monitor response times, outcomes and themes arising from requests and reviews to identify learning and improvement opportunities.

Objective 5: Support compliance with consumer regulation requirements

- We'll regularly review changes to legislation, regulation and statutory guidance relating to customers' access to information.
- We'll cooperate with the Housing Ombudsman and Regulator of Social Housing in relation to STAIRs compliance and investigations.
- We'll monitor compliance with this policy and supporting procedures through defined governance and assurance arrangements.
- We'll take learning from complaints, regulatory feedback and internal reviews to strengthen transparency and accountability.

7. Monitoring, reporting and review

- Compliance with STAIRs publication requirements will be monitored through periodic review of the publication scheme and associated governance arrangements.
- Information request handling performance, including response times, review outcomes and themes relating to repeat or redirected requests will be monitored regularly.
- Complaints and Ombudsman findings relating to access to information will be reviewed to identify learning and improvement opportunities.
- Relevant performance, compliance and assurance information will be reported through appropriate governance arrangements.

This policy will be reviewed 12 months after implementation to reflect learning from the first year of STAIRs, including the operation of the publication scheme and information request process.

Following this initial review, the policy will be reviewed every three years, or sooner if legislation, regulation, guidance or operational requirements change.

8. Equality, diversity and inclusion

This policy will be delivered in line with our Equality, Diversity and Inclusion Policy. An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

9. Data protection

We use a risk-based approach to processing personal data to ensure that we assess any risks to privacy or to the rights and freedoms of people before commencing, commissioning or changing data processing activities. Our Data Protection Impact Assessment (DPIA) process was completed as part of the approval process.

10. Related legislation and regulations

- Social Housing (Regulation) Act 2023
- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Regulator of Social Housing Consumer Standards
- Housing Ombudsman Complaint Handling Code
- Social Tenant Access to Information Requirements (STAIRs)

11. Related policies and procedures

- Data Protection Policy
- Complaints Policy
- Equality, Diversity and Inclusion Policy
- MP & Councillor Enquiries Policy
- Transparency and Access to Information Procedure

12. Customer engagement

Where appropriate, targeted customer engagement will be used to test whether information and guidance are easy to find, understand and access.

Learning from complaints, customer feedback and scrutiny activity will also inform future reviews of this policy.

Document revision history

Date	Changes approved by	Details of changes made