Access to Information Policy

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Access to Information Policy

1. Purpose

Hundred Houses Society is committed to being open, transparent and accountable to its tenants.

This policy explains how tenants and their representatives can access information about how their homes and services are managed. It sets out our approach to publishing information, responding to information requests, handling reviews and complaints under the Social Tenant Access to Information Requirements (STAIRs).

The policy supports tenants to better understand how services are delivered, how decisions are made and how we are performing. It also enables tenants to hold Hundred Houses Society, as their landlord, to account.

2. Scope

This policy applies to all employees of Hundred Houses Society and anyone acting on our behalf in the delivery or management of homes and services.

The policy covers:

- Our Publication Scheme.
- Tenant information requests.
- Requests for review; and
- Complaints relating to Access to Information and STAIRs.

3. Regulatory Framework

This policy has been developed in line with the Social Tenant Access to Information Requirements (STAIRs), which forms part of the Transparency, Influence and Accountability Consumer Standard issued by the Regulator of Social Housing.

STAIRs is intended to improve transparency, accountability and tenant involvement by giving tenants greater access to information about how their homes and services are managed. Registered providers are required to proactively publish information and respond to requests for information unless there is a lawful and reasonable basis for withholding it.

The Publication Scheme requirements apply from 1 October 2026. Information Request requirements apply from 1 April 2027.

4. Our Approach

Hundred Houses Society supports the principles of transparency, openness, accountability and tenant involvement that underpin STAIRs.

We will take a proactive approach to publishing information about our services, performance and decision-making. Information that falls within the scope of STAIRs should generally be published or disclosed unless there is a lawful and reasonable reason not to do so.

When considering requests for information, we will focus on the information requested rather than the reasons for the request. We will not refuse to disclose information solely because disclosure may result in criticism, challenge or adverse publicity.

We will make Information easy to find, easy to understand and accessible to all tenants.

5. Publication Scheme

Hundred Houses Society will maintain a Publication Scheme setting out the information we routinely publish.

The Scheme will be reviewed regularly to ensure information remains accurate, up to date and accessible. We will take reasonable steps to make tenants aware of the information available through the Scheme and how it can be accessed.

Further details are provided in Appendix 1: Publication Scheme

6. Information Requests

From 1 April 2027, tenants and their authorised representatives may request information relating to the management of our social housing services.

Requests will be handled fairly, consistently and in line with the STAIRs framework. We will provide a response within thirty calendar days.

Information will ordinarily be provided free of charge and in an accessible format.

Further details are provided in Appendix 2: Information Request Procedure

7. Information That May Be Withheld

While the starting point under STAIRs is openness and disclosure, there may be occasions where information cannot reasonably be disclosed, such as where the information amounts to a protected class of information under the freedom of information or data protection (or other) laws.

Any decision to withhold or redact information will be considered on a case-by-case basis. We will consider the benefits of transparency alongside any potential harm that disclosure may cause.

Any decision to withhold or redact information will be reasonable, proportionate and consistent with the principles of transparency, openness, accountability and tenant involvement that underpin STAIRs.

We will explain the reasons for withholding information.

Further details are provided in Appendix 2: Information Request Procedure

8. Reviews and Complaints

If you or a representative is dissatisfied with the way a request has been handled, believes information should have been published, or disagrees with a decision to withhold information, you may request a review.

Review requests should normally be submitted within three months of the original decision.

We will carry out an internal review and aim to provide a response within thirty calendar days.

If the requester remains dissatisfied following the review, they may refer the matter to the Housing Ombudsman in accordance with the Housing Ombudsman Scheme.

Further details are provided in Appendix 2: Information Request Procedure

9. Accessibility and Data Protection

We are committed to making information accessible to all tenants.

Information can be provided in alternative formats where reasonably required, including large print, Braille, Audio, Easy Read and translated formats. We will make reasonable adjustments to meet individual communication needs wherever possible.

Data protection legislation applies to all information held by Hundred Houses Society. Information containing personal data may be withheld or redacted where disclosure would breach legal requirements.

Requests for a tenant's own personal information will be managed as a Subject Access Request (SAR) in accordance with our Data Protection and GDPR processes. Alternatively available from governance@hhs.org.uk Tel. No 0300 303 5770.

Further information is available in our Privacy Notice

10. Responsibilities

This policy is approved by the Board. The Chief Executive has overall responsibility for ensuring compliance with this policy.

The Governance Manager is responsible for day-to-day implementation, maintaining the Publication Scheme, overseeing information requests and monitoring compliance.

All employees are responsible for supporting the effective operation of this policy and assisting with information requests where required.

11. Monitoring and Review

Hundred Houses Society will maintain records of information requests, response times, review outcomes and complaints to support monitoring, accountability and continuous improvement.

This policy, together with the Publication Scheme and Information Request Procedure, will be reviewed regularly to ensure ongoing compliance and effectiveness. It will be kept under regular review to ensure it remains up to date, fit for purpose and aligned with customer and regulatory expectations.

12. Equality Impact Assessment

This policy promotes equality by helping all tenants' access information about the services they receive and the way their landlord operates.

No adverse impacts on protected groups have been identified. Reasonable adjustments will be provided wherever required to support equal access to information.

Appendix 1

Publication Scheme

Introduction
Hundred Houses Society is committed to being open, transparent and accountable to its tenants.

This Publication Scheme explains the information we routinely make available about our housing services, governance, performance and decision-making. The purpose of the Scheme is to ensure tenants can easily access information without needing to make a formal information request.

We will take a proactive approach to publishing information and will seek to make available information that tenants may reasonably wish to access. Information will generally be published unless there is a lawful and reasonable reason not to do so.

Information published under this Scheme will normally be available on our website and reviewed regularly to ensure it remains accurate, relevant and up to date.

Accessing Information
Information covered by this Scheme will normally be available free of charge through the Hundred Houses Society website.

Where information is not available online, or where a tenant requires information in an alternative format, requests can be made to the Governance Team. We will make reasonable adjustments and provide information in accessible formats where required, including large print, Audio, Braille, Easy Read and translated versions.

STAIRs Publication Classes
The following table sets out the classes of information that Hundred Houses Society will normally publish under the Publication Scheme.

Publication Classes	Examples of Information Published	Access Method
Governance and Decision Making	Board and Committee Information, Board Member Profiles, Annual Report, Corporate Strategy, Business Plan, Delegations and Authorisations, Standing Orders, Information about how decisions are made and overseen.	Website / Publication Scheme
Finance and Spending	Annual Accounts, Financial Statement, Value for Money Strategy, Rent and Service Charge Information, Procurement Information, Financial Regulations, Contracts Information.	Website / Publication Scheme
Homes and Communities	Homes Strategy, Sustainability Strategy, Asset Management Information, Planned Investment and Improvement Programmes, Energy Efficiency Information, Home Safety, Estate Improvements and Other Information Relating to Homes and Communities.	Website / Publication Scheme

Performance	Tenant Satisfaction Measures (TSMs), Performance Reports, Complaints Information, Customer Feedback, Service Improvement Activity, and Information About How HHS is Performing.	Website / Publication Scheme
Housing Services and Tenant Liaison	Repairs and Maintenance Information, Tenancy and Neighbourhood Services, Customer Service Information, Customer Engagement and Consultation Opportunities, Scrutiny Arrangements, and Information About Housing Services.	Website / Publication Scheme
Lists and Registers	Summaries of Risk Assessments, Registers, logs, inspection records, and performance reports for; Fire and Electrical Safety, Gas Safety Records and Servicing Programmes, Asbestos Management, Water Hygiene, Damp and Mold, Estate Inspection Records, Home Accessibility and Adaptions.	Website / Publication Scheme
Housing Management Policies and Strategies	Housing Management Policies and Strategies, Property Management Policies, Health, Safety and Compliance Policies, Tenancy, Lease, Rent and Service Charge Policies, Governance Policies, Corporate and Service Strategies, and Other Housing and Service Policies and Strategies.	Website / Publication Scheme

Information That May Not Be Published
STAIRs does not require Hundred Houses Society to create new information that does not already exist.

Information may not be published where there is a lawful and reasonable basis for withholding it. This may include personal data, legally privileged information, information relating to ongoing investigations, sensitive security information, commercially sensitive material, the work required exceeds 18 hours or the request is unclear, repeated, abusive or excessive

Any decision not to publish information will be considered on a case-by-case basis and will be consistent with the principles of transparency and accountability set out in this policy.

Charges
Information published under this Scheme will normally be available free of charge.

Where additional hard copies are requested, charges may be applied to cover the reasonable costs of printing, copying and postage.

A first copy provided in an accessible format will normally be supplied free of charge.

Information may also be inspected at our offices by appointment without charge.

Review of the Scheme
This Scheme will be reviewed regularly to ensure it remains accurate, accessible and compliant.

If a tenant believes information should be included within the Scheme, or that information has been unnecessarily withheld or redacted, they may request a review through the process set out in this policy.

Tenant Feedback

We encourage tenant feedback on the publication scheme and how we handle information requests. You can provide feedback in the following ways:

- Email to governance@hhs.org.uk
- Talking to your Housing Officer or a Customer Service Officer
- Tenant panels/meetings.

Appendix 2

Information Request Procedure

Introduction
This procedure explains how Hundred Houses Society will handle information requests made under the Social Tenant Access to Information Requirements (STAIRs).

The starting point for all requests is openness and disclosure. Information will normally be provided unless there is a lawful and reasonable basis for withholding it.

Who Can Make a Request?
Tenants of Hundred Houses Society and their authorised representatives may request information relating to the management of our social housing services.

Representatives will be asked to provide evidence that they have authority to act on behalf of a tenant.

Making a Request
Requests may be submitted by:

- Email to governance@hhs.org.uk
- Letter.
- Online form (available 1st April 2027).
- Tenant panels/meetings or via your tenant liaison officer.
- Any other reasonable and accessible method.

Requesters do not need to explain why they want the information and requests will not be judged on the reasons for the request.

Where clarification is needed, we will contact the requester as soon as possible.

How We Handle Requests
When a request is received, Hundred Houses Society will:

1. Acknowledge receipt of the request.
2. Determine whether the request is valid and falls within the scope of STAIRs.
3. Seek clarification where necessary to identify the information being requested.
4. Check whether the information is already available through the Publication Scheme or otherwise publicly available.
5. Identify whether the information is held by the Society or by an organisation acting on its behalf.
6. Consider whether any information should reasonably be withheld or redacted.
7. Respond within thirty calendar days. Additional time may be required where the Society needs to assess whether information can be disclosed or obtain information held by a contractor or another organisation acting on its behalf.
8. Record the request and outcome for monitoring and reporting purposes.

Logging and Monitoring Requests
All requests will be recorded in the STAIRs register.

The register will include:

Information Recorded	Purpose
Date received	Monitoring response times
Request summary	Record of information requested
Clarification requested	Audit trail
Response date	Compliance monitoring
Any extension applied	Accountability and reporting
Outcome of request	Learning and improvement
Review requested	Monitoring service quality
Review outcome	Governance and assurance

Information from the register will be used to monitor compliance, identify trends and support service improvement.

Responding to Requests
We will respond within thirty calendar days of receiving a valid request.

Responses may:

- Provide the information requested.
- Direct the requester to information already published.
- Provide information with appropriate redactions.
- Explain why information has been withheld.

Where additional time is required, we will explain the reason and provide a revised response date. Any extension will be reasonable and kept to the minimum necessary.

Accessible Information
Information will normally be provided electronically unless an alternative format is requested.

We will make reasonable adjustments and provide information in accessible formats wherever reasonably practicable, including:

- Large print.
- Audio.
- Braille.
- Easy Read.
- Translated formats.

Withholding or Redacting Information
Any decision to withhold or redact information is considered on a case-by-case basis. When deciding, we will consider:

Consideration	Example
Protected class of Information	Freedom of Information or data protection (or other) laws
Legal obligations	Compliance with legislation and regulatory requirements
Personal data	Protecting information that identifies an individual
Legal privilege	Confidential legal advice
Health, safety, and security	Protecting people, property, and systems
Regulatory or enforcement activity	Ongoing investigations or proceedings
Commercial sensitivity	Confidential commercial information
Public interest and harm	Whether the likely harm from disclosure outweighs the benefits of transparency

Information will not be withheld solely because disclosure may result in criticism, challenge, or negative publicity.

Where information is withheld or redacted, we will explain our reasons wherever possible.

Reviews
A requester may seek a review if they believe:

- Information should have been published.
- Information has been withheld or redacted without good reason.
- The request has not been handled appropriately.
- Information has not been provided in an accessible format.
- Response times have not been met without reasonable justification.

Review requests should be submitted within three months of the original decision.

Where possible, reviews will be carried out by a person who was not involved in the original decision.

We aim to respond to review requests within thirty calendar days.

Housing Ombudsman
If a requester remains dissatisfied following the internal review process, they may refer the matter to the Housing Ombudsman in accordance with the Housing Ombudsman Scheme - Social Tenant Access to Information Requirements (STAIRs) support guide. Any complaint to the Ombudsman should generally be made within three months of the outcome of your review.

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