SUBJECT:	APPROVAL DATE	October 2026
STAIRs COMPLAINTS AND REVIEW POLICY AND PROCEDURE	EFFECTIVE DATE	October 2026
	REVIEW DATE	October 2028

1. INTRODUCTION

Teachers Housing Association (THA) is committed to openness, transparency and accountability in the services it provides to tenants and other residents.

The Social Tenant Access to Information Requirements (STAIRs) establish a framework that gives social housing tenants greater access to information about how their landlord operates, performs and makes decisions.

STAIRs consist of:

- **Chapter 1** - Publication Scheme, which requires registered providers to proactively publish specified information.
- **Chapter 2** - Information Requests, which gives tenants the right to request information that has not already been made available through the Publication Scheme.

This policy sets out the arrangements for handling complaints and review requests relating to both Chapters of STAIRs. It provides tenants with a clear process for challenging decisions, raising concerns about information that has not been published, and seeking a review where they believe THA has not complied with its obligations under the STAIRs framework.

2. POLICY STATEMENT

THA will:

- Comply with the requirements of STAIRs.
- Maintain and regularly update its Publication Scheme.
- Respond to information requests in accordance with statutory requirements.
- Provide an accessible and transparent review process.
- Ensure reviews are conducted fairly and independently.
- Learn from complaints and review requests to improve services.
- Promote a culture of openness and accountability.

3. PURPOSE

The purpose of this policy is to:

- Provide a formal mechanism for reviewing decisions made under STAIRs.
- Ensure complaints relating to the Publication Scheme are addressed appropriately.
- Enable tenants to challenge decisions relating to information requests.
- Ensure compliance with statutory timescales and requirements.
- Promote tenant confidence in THA's information governance arrangements.
- Support continuous improvement and transparency.

4. SCOPE

This procedure applies to matters arising under both Chapter 1 and Chapter 2 of STAIRs.

4.1 Chapter 1 - Publication Scheme

This procedure applies where a tenant believes:

- Information required by THA's Publication Scheme has not been published.
- Published information is inaccurate.
- Published information is incomplete.
- Published information is misleading.
- Published information is out of date.
- Information is not reasonably accessible.
- THA has failed to meet its publication obligations.

4.2 Chapter 2 - Information Requests

This procedure applies where a tenant is dissatisfied with:

- A refusal to provide information.
- Information that has been withheld.
- The application of an exemption.

- Information that has been redacted.
- The completeness of information provided.
- The accuracy of information provided.
- Delay in responding to a request.
- The manner in which the request has been handled.

5. RELATIONSHIP WITH COMPLAINTS AND APPEALS POLICY

This procedure operates separately from THA's Complaints Policy.

Whilst THA's Complaints Policy deals with dissatisfaction regarding service delivery, housing management and landlord services, this procedure specifically addresses matters relating to access to information under STAIRs.

This procedure constitutes THA's formal internal review mechanism for:

- Chapter 1 Publication Scheme complaints.
- Chapter 2 Information Request reviews.

Where an issue involves both access to information and wider service failures, THA may consider parts of the matter under both procedures where appropriate.

6. WHO MAY REQUEST A REVIEW?

A review may be requested by:

- Tenants.
- Joint tenants.
- Leaseholders.
- Shared owners.
- Authorised representatives.
- Advocacy organisations acting on behalf of a tenant.
- Members of Parliament or local councillors acting on behalf of a tenant with appropriate authority.

THA may request evidence of authority before disclosing information to a representative.

7. GROUNDS FOR COMPLAINT OR REVIEW

7.1 Chapter 1 Publication Scheme Complaints

A review may be requested where an applicant believes that:

- Information required by the Publication Scheme has not been published.
- Published information is inaccurate, incomplete or misleading.
- Information has not been updated appropriately.
- Information cannot reasonably be located or accessed.
- THA has failed to comply with its Publication Scheme obligations.

7.2 Chapter 2 Information Request Reviews

A review may be requested where an applicant believes that:

- THA has failed to respond within the statutory timescale.
- Information has been incorrectly withheld.
- An exemption has been applied incorrectly.
- Information supplied is incomplete.
- Information requested falls within STAIRs but has not been provided.
- Excessive or inappropriate redactions have been applied.
- The request has not been handled appropriately.

8. STATUTORY AND PROCEDURAL TIMESCALES

8.1 Publication Scheme Complaints (Chapter 1)

THA will investigate complaints relating to its Publication Scheme as soon as reasonably practicable and normally within:

30 calendar days of receiving the complaint.

This includes complaints where a tenant believes that information required by the Publication Scheme:

- Has not been published;

- Is inaccurate, incomplete or misleading;
- Is out of date; or
- Is not reasonably accessible.

Where additional enquiries are required to determine whether information should be published or updated, THA may extend the response period where reasonably necessary. In such circumstances, THA will notify the complainant of the reasons for the delay and provide a revised date for issuing its response.

8.2 Information Requests (Chapter 2)

THA will respond to valid information requests as soon as reasonably practicable and normally within 30 calendar days of receipt:

Where clarification is required from the applicant, the response period may be paused until sufficient clarification has been received.

Where a request is particularly complex or voluminous, THA will notify the applicant if additional time is required and explain the reasons for any delay.

8.2 Requests for Review

Requests for review should normally be submitted within 40 working days of:

- THA's response to an information request; or
- The applicant becoming aware of the Publication Scheme issue being challenged.

This timeframe is intended to support the timely investigation and resolution of concerns under the Social Tenant Access to Information Requirements (STAIRs).

THA may, at its discretion, accept requests submitted outside this period where there are reasonable grounds for the delay or where it is otherwise fair and proportionate to do so.

THA will not reject a review request solely because it was submitted outside the normal 40 working day period and will consider the circumstances of each case individually

9. HOW TO REQUEST A REVIEW

Applicants should submit their review request in writing wherever possible.

The request should include:

- Name and contact details.
- Property address (where applicable).
- Details of the original information request or publication concern.
- Date of the original response.
- The reasons for requesting a review.
- Any supporting information or evidence.

Requests should be submitted to:

Teachers Housing Association
Headland House

Floor 3 72 Acton Street

London

WC1X 9NB

Telephone: 020 7440 9440
Email: enquiries@teachershousing.org.uk

Where an applicant is unable to submit a request in writing, THA will provide reasonable assistance.

10. ACKNOWLEDGEMENT OF REVIEW REQUESTS

THA will acknowledge receipt of a review request within:

5 working days

The acknowledgement will:

- Confirm receipt of the review request.
- Identify the reviewing officer where appropriate.
- Explain the review process.
- Confirm the expected response date.

11. REVIEW PROCESS

Reviews will normally be undertaken by a senior manager who was not involved in the original decision wherever practicable.

The review will be conducted independently and will consider all relevant evidence.

11.1 Chapter 1 Publication Scheme Reviews

The reviewer will consider:

- Whether the information should form part of the Publication Scheme.
- Whether information published by THA is current.
- Whether information is complete and accurate.
- Whether information is reasonably accessible to tenants.
- Whether THA has complied with publication obligations.
- Whether additional information should be published proactively.

11.2 Chapter 2 Information Request Reviews

The reviewer will consider:

- Whether the request falls within the scope of STAIRs.
- Whether all relevant information has been identified.
- Whether information has been disclosed appropriately.
- Whether exemptions have been applied correctly.
- Whether any redactions are proportionate and justified.
- Whether statutory deadlines were met.
- Whether the request was handled fairly and consistently.

The reviewing officer may seek advice from:

- Senior management.
- Governance specialists.
- Data protection advisers.
- Legal advisers.
- Other suitably qualified professionals.

12. REVIEW TIMESCALES

THA will normally complete the review and issue a written outcome within:

30 calendar days of receiving the request for review.

Where a review is particularly complex, THA may extend this period.

Where an extension is necessary THA will:

- Notify the applicant before the original deadline expires.
- Explain the reasons for the delay.
- Confirm a revised response date.

13. REVIEW OUTCOMES

The written review outcome will explain:

- The issues considered.
- The information and evidence reviewed.
- Relevant findings.
- Reasons for the decision.
- Any corrective action to be taken.
- Rights of escalation.

The outcome may:

- Uphold the Original Decision
  - The original decision is found to be appropriate and compliant.
- Partially Uphold the Complaint
  - Some aspects of the complaint are upheld and corrective action will be taken.
- Overturn the Original Decision
  - The reviewer determines that information should be disclosed, published or amended.
- Recommend Service Improvements
  - The review identifies improvements that should be made to policies, procedures, systems, training or governance arrangements.

14. REMEDIES

Where appropriate THA may:

- Provide the requested information.
- Publish information through the Publication Scheme.

- Correct inaccurate information.
- Update outdated information.
- Amend records.
- Issue an apology.
- Review procedures.
- Provide additional staff training.
- Implement service improvements.

15. EXEMPTIONS AND WITHOLDING INFORMATION

THA is committed to transparency; however certain information may lawfully be withheld.

Examples include:

- Personal data relating to third parties.
- Information protected by data protection legislation.
- Legally privileged information.
- Commercially sensitive information.
- Information relating to ongoing investigations.
- Information where disclosure would create a security or safety risk.

Each decision will be assessed on its individual merits.

16. CONFIDENTIALITY

All complaints and review requests will be handled confidentially.

Information will be processed in accordance with:

- UK GDPR.
- Data Protection Act 2018.
- THA Information Governance Policies.
- Relevant regulatory requirements.

Information collected as part of the review process will only be used for the purpose of investigating and resolving the matter.

17. REASONABLE ADJUSTMENTS

THA is committed to ensuring that all tenants can access this procedure fairly.

Reasonable adjustments may include:

- Large print formats.
- Alternative accessible formats.
- Translation services.
- Interpretation services.
- Assistance completing requests.
- Additional support for vulnerable tenants.

Requests for reasonable adjustments will be considered on a case-by-case basis.

THA's commitment to supporting residents through reasonable adjustments is reflected within its existing policies and procedures.

18. MONITORING, REPORTING AND LEARNING

THA will maintain a central record of all STAIRs complaints and review requests.

Information will be monitored to:

- Measure compliance with timescales.
- Identify trends and recurring concerns.
- Monitor Publication Scheme compliance.
- Improve information governance arrangements.
- Support service improvement initiatives.

Significant themes and learning outcomes may be reported to the Board and senior management.

19. ESCALATION TO THE HOUSING OMBUDSMAN

Where an applicant remains dissatisfied after completion of THA's internal review process, they may refer the matter to the Housing Ombudsman Service.

The Housing Ombudsman may consider complaints relating to:

- Compliance with Chapter 1 Publication Scheme obligations.
- Access to information under Chapter 2 Information Requests.
- The handling of STAIRs reviews by THA.

Housing Ombudsman Service
PO Box 1484
Preston
PR2 0ET

Telephone: 0300 111 3000

Website: www.housing-ombudsman.org.uk

DOCUMENT CONTROL

Version	Date	Author	Summary
1.0	October 2026	Teachers Housing Association	Initial STAIRs Complaints and Review Policy and Procedure covering Chapter 1 Publication Scheme requirements and Chapter 2 Information Request requirements

RELATED DOCUMENTS

- THA Publication Scheme
- THA Complaints and Appeals Policy
- Data Protection Policy
- Records Management Policy
- Equality, Diversity and Inclusion Policy
- Information Governance Framework

This policy should be read alongside THA's Publication Scheme and existing complaints arrangements and provides the Association's formal review mechanism under the Social Tenant Access to Information Requirements (STAIRs).