

# Social Tenant Access to Information Policy

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.  | <b>INTRODUCTION</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|     | <b>Purpose</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.1 | This policy sets out how we publish and share information that our customers have a right to access under the Social Tenant Access to Information Requirements (STAIRs).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|     | <b>Scope</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.2 | <p>This policy relates to information that we publish or share under STAIRs, such as information about how we deliver services to customers. The policy does not cover:</p> <ul style="list-style-type: none"> <li>• Requests or complaints about personal data, which are managed under the Data Protection Policy;</li> <li>• Information that is not related to whg, such as local authority decisions;</li> <li>• Information that does not relate to our social housing, such as information about our subsidiary companies, commercial customers or leaseholders.</li> </ul>                                                                                                                                 |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.3 | This policy also explains the reasons why some information may be removed before a document is published or shared.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.4 | Within this policy, 'you' or 'a customer' means anyone who holds a social housing tenancy with whg, including shared owners who have not purchased 100% of their home, or anyone contacting us on behalf of a social housing tenant with the tenant's permission.                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|     | <b>Legal and regulatory framework</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.5 | <b>The Regulator of Social Housing's Transparency, Influence and Accountability Standard</b> gives social housing tenants (whg customers) the right to access information about our services. The government's policy statement on the Social Tenant Access to Information Requirements (STAIRs) sets out the types of information that customers should be able to access. We must publish this information on our website as a 'publication scheme'.                                                                                                                                                                                                                                                             |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.6 | <b>The Data Protection Act 2018 and GDPR</b> set out the rules for protecting personal data.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2.  | <b>POLICY STATEMENT</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|     | <b>Publication scheme</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 2.1 | <p>Our publication scheme includes information about:</p> <ul style="list-style-type: none"> <li>• Our governance and decision-making: how our organisation is structured and how we make decisions, including how our customers are involved in shaping our services;</li> <li>• Our spending and finance: the income that we receive, including through customers' rents and service charges, and how we spend the money, as well as information about our procurement and contracts;</li> <li>• How we manage our homes: information about our social housing services, such as our policies that affect customers, the number and type of homes that we manage, and how we repair and improve them;</li> </ul> |

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     | <ul style="list-style-type: none"> <li>• Our performance: how well we are doing against our performance targets, and how satisfied our customers are with our services; and</li> <li>• Our lists and registers: other information about our housing services, such as a list of our upcoming estate walkabouts.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                         |
| 2.2 | We publish information clearly, and we make sure that information we have published on our website is kept up to date. Our detailed full publication scheme, including how often information is updated, is available on our website.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2.3 | We make sure that we publish information in a way that is accessible for our customers. If you would like information to be shared with you in a different way, we will do this within 30 days of the request. If you ask for printed copies, we may charge for printing and postage. We will tell you about any charge before we provide the copies. We will not charge for translated or Braille copies.                                                                                                                                                                                                                                                                                         |
| 2.4 | Some documents may need to have sections removed ('redacted') before they are published or shared. We will only redact sections if they are confidential or contain personal data, or if they contain information that we do not own.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|     | <b>Requesting a review</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 2.5 | If you feel that we have not published the information that you have a right to access under STAIRs, you can ask for a review of our publication scheme at any time. You must tell us what information you believe we have not published.                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 2.6 | <p>When we carry out a review of our publication scheme, we will check:</p> <ul style="list-style-type: none"> <li>• Whether we have already published the information on our website;</li> <li>• Whether we should publish the information under STAIRs;</li> <li>• Whether it would be fair and transparent to publish the information, even if it is not required under STAIRs;</li> <li>• Whether the information is not published because it is not part of STAIRs (see 1.2) or there is an exemption (see 2.12) and, if so, whether that reason is still relevant;</li> <li>• Whether there is any other substantial reason why the information could not be published or shared.</li> </ul> |
| 2.7 | You can also ask for a review if you have asked for information in an accessible format and we have responded, but you are not happy with our response. You must ask for a review within three months of our response.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 2.8 | We will respond to you within 30 days of your request for a review, and our response will include the reasons behind our decision. If we need more time to respond, we will tell you as soon as possible. If we have made changes to our publication scheme as a result, we will tell you and we will try to make sure the extra information has been published when we reply to you.                                                                                                                                                                                                                                                                                                              |
| 2.9 | If you have not received a response to a request for a review within 30 days, or if you are unhappy with our response, you can make a complaint to the Housing Ombudsman under the ombudsman's STAIRs complaints scheme.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2.10      | You can access forms on the STAIRs page on our website to ask for a review. Paper forms are also available at our office and can also be requested via our Customer Services team. You can also visit our office to view any published information electronically.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|           | <b>Extra information about our services</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2.11      | From 1 April 2027, customers will have the right to ask us for extra information about our housing services if it is not available on our website. You must make this request in writing, which could be by post, email, submitting a form at our office or via our website. We will share this information with you within 30 days of your request. If we need more time, we will let you know when we will respond and why we need longer than 30 days.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2.12      | <p>We will share information as much as we can. In some situations, we may not be able to share information under STAIRs. This may be because:</p> <ul style="list-style-type: none"> <li>• We do not have the information;</li> <li>• The information is already published or we will be publishing it in future;</li> <li>• We could not put the information together in a way that could be published or shared without making significant changes to how we store information, for example if it would take more than 18 hours to put together the information;</li> <li>• The information was requested by someone who is not a customer;</li> <li>• The information is confidential, for example because it relates to sensitive financial or contractual information, or if it was provided in confidence and it would be a breach of confidence to share the information;</li> <li>• The information is considered personal data, because it is about an individual person or could be used to identify an individual person;</li> <li>• We do not 'own' the information, for example reports about whg written by other organisations, such as internal audits;</li> <li>• The information could damage our or another person's commercial interests, for example information about commercial negotiations;</li> <li>• The information is legally privileged, for example legal advice;</li> <li>• The information is not part of STAIRs (see 1.2);</li> <li>• We have already responded to the same or a very similar request, including where similar requests appear to be connected;</li> <li>• The request includes language or behaviour that is inappropriate, threatening or abusive;</li> <li>• There is another reason why it would be reasonable for us not to publish or share the information, using the principles of the Freedom of Information Act 2000.</li> </ul> |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2.13      | When there is a possibility that sharing the information could cause problems, such as if it might reveal sensitive information about a specific group of people, we will apply a 'harm test'. This means we will try to weigh whether there is more of a risk of harm in withholding the information or sharing it. If we need to apply a harm test, the decision on whether to share the information will be made by the Data Protection Officer.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2.14      | If you have asked for extra information but you are not happy with our response, you can ask for a review. Reviews following requests for extra information follow the same principles as reviews of our publication scheme, set out in the section <b>Requesting a review</b> . Requests must be made within three months of our original response.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>3.</b> | <b>PERFORMANCE MEASURES</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3.1       | <p>Our records relating to STAIRs are monitored by the Governance and Data Protection teams and reported every three months to the Resources and Foundations Panel. These records include:</p> <ul style="list-style-type: none"> <li>• All information published or shared specifically under STAIRs and the date this information was published or shared;</li> <li>• All customer requests for additional information made under STAIRs, from 1 April 2027;</li> <li>• All customer review requests, how we responded and how long we took to respond;</li> <li>• Changes that we made to our publication scheme or procedures as a result of a request for extra information or a review.</li> </ul> |
| <b>4.</b> | <b>TRAINING</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 4.1       | <p>We hold annual refresher training sessions for colleagues so that they are aware of customers' rights under STAIRs and how all colleagues can help support transparency at whg. We also publish this policy on our website and our colleague intranet.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>5.</b> | <b>MONITORING AND REVIEW</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5.1       | <p>Colleagues from across whg contribute to publishing and sharing documents as part of STAIRs, including:</p> <ul style="list-style-type: none"> <li>• The Head of Governance and Assurance, who makes sure the information published under our publication scheme is kept up to date, and who reviews the publication scheme annually to make sure we are publishing everything we need to;</li> <li>• The Data Privacy Manager / Data Protection Officer, who makes sure customer data requests are handled in line with this policy; and</li> <li>• The Director of Governance and Legal, who is responsible for making sure we follow this policy fully.</li> </ul>                                 |
| 5.2       | <p>This policy will be reviewed in quarter 3 2027. We carry out annual assessments to check our compliance with this policy and with the Transparency, Influence and Accountability Standard.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>6.</b> | <b>ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 6.1       | <p>Documents, policies and procedures associated with this policy are:</p> <ul style="list-style-type: none"> <li>• STAIRs procedure</li> <li>• Data Protection Policy</li> <li>• Data protection complaints procedure</li> <li>• Third party authorisation guidance</li> <li>• Information Classification and Handling Policy</li> <li>• Data Retention Policy</li> <li>• Diversity and Inclusion Policy</li> </ul>                                                                                                                                                                                                                                                                                     |

## DOCUMENT CONTROL

|                             |                                                                 |
|-----------------------------|-----------------------------------------------------------------|
| <b>Document author</b>      | Data Privacy Manager/DPO and Head of Governance and Assurance   |
| <b>Document owner</b>       | Corporate Director of Governance, Compliance and Communications |
| <b>Reviewed/approved by</b> | Group Executive                                                 |
| <b>Review date</b>          | Quarter 3 2027                                                  |
| <b>Our 2030 Plan</b>        | Strong governance                                               |