



Zen: Social Tenants Access to Information Requirements (STAIRs)

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Author:	Altair & ZLML
Policy Owner:	Zen Board
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1. Introduction and purpose

- 1.1 Zen Housing Limited, Zen Rented Limited and Zen Housing 2 Limited (together “Zen”) is committed to being open and transparent with residents about how it manages social housing, the services it provides and the decisions it makes.
- 1.2 This policy sets out Zen’s approach to meeting the Social Tenants Access to Information Requirements (STAIRs), including the publication of information from 1 October 2026 and the handling of information requests from 1 April 2027.
- 1.3 The policy is intended to be proportionate to Zen’s size, operating model and resources, while ensuring that residents can easily identify and access information that falls within the scope of STAIRs.

2. Scope

- 2.1. This policy applies to information held by Zen or held on its behalf by organisations delivering housing management functions, where that information relates to the management of Zen’s social housing.
- 2.2. The policy applies to social housing residents, including residents who are entitled to access information under STAIRs. Zen will also take a reasonable and consistent approach where residents need support to understand or access published information.

3. Policy statement



- 3.1. Zen will publish, or otherwise make available as a matter of routine, information it holds that falls within the STAIRs classes of information. This will be done in a clear, accessible and proportionate way so that residents can understand how Zen is governed, how services are delivered and how performance is monitored.
- 3.2. Zen will not withhold information because it may be inconvenient, critical or have a potential reputational impact. Decisions to redact or withhold information must be based on lawful, reasonable and recorded grounds.
- 3.3. Zen is not required to create new records solely to comply with STAIRs and will not publish information that is outside the scope of social housing management, is not held or is not readily available because it has been archived in line with normal retention arrangements, is in draft form, is superseded, or is properly available through another statutory route.
- 3.4. Zen will not disclose information when doing so would bring them into conflict with any statutory provisions.
- 3.5. The Board will approve Zen's publication approach and receive assurance that the arrangements remain effective, proportionate and compliant.

4. Publication scheme

- 4.1. Zen will maintain a publication scheme that explains the information it routinely publishes or makes available under the following classes of information:
 - governance and decision-making;
 - spending;
 - housing stock management;
 - performance;
 - housing services;
 - lists and registers; and
 - social housing management.



- 4.2. Zen will identify, where relevant, the location of information, who is responsible for keeping it up to date, the expected review frequency and any limitations on publication.
- 4.3. Zen will normally make information available through its website, resident communications channels or clear signposting to appropriate sources. Where information is not suitable for routine website publication but is within scope and held, Zen will explain how residents can access it.
- 4.4. The publication scheme will be reviewed at least annually and sooner where there are relevant changes to STAIRs, regulatory expectations, resident needs or Zen's operating arrangements.
- 4.5. Residents may ask Zen to review the publication scheme where they believe Zen holds information that falls within scope but has not been published, or where they consider that information has been unnecessarily redacted or withheld. Zen will consider review requests through its STAIRs review process and will explain the outcome clearly.

5. Information requests

- 5.1. From 1 April 2027, Zen will provide a route for eligible residents to request specific information within the scope of STAIRs. Eligible residents applies to social housing tenants of Zen and their designated representatives.
- 5.2. Requests to be valid must be in writing and the requestor identifiable, and identify their designated representative to Zen, where appropriate. The tenant does not have to use the word STAIRs for the request to be identified and treated as such and Zen, or their managing agent, will make reasonable efforts to assist tenants to make clear, valid requests. Managing agents will pass any requests received to Zen promptly.
- 5.3. Zen will acknowledge and manage requests in a timely, fair and consistent way and no later than 30 calendar days from receipt of the request. Requests will be assessed to determine whether the information is held, whether it relates to social housing management, whether any exemption or redaction applies, and whether the information can be provided in the format requested.
- 5.4. Any extension to the 30 day timeframe will only be in exceptional circumstances when considering whether to withhold the information or to arrange access to information held by a body responsible for managing the housing on behalf of Zen. Contracts or





management arrangements will support Zen's ability to access relevant information held by managing agents or contractors.

- 5.5. Any extension on the timescale will be reasonable. Zen will notify the resident of any delays or refused requests and the reasons. When a response is delayed, the new proposed timescale will be confirmed.
- 5.6. Where information is already published, Zen may signpost the resident to the relevant location, while taking account of any accessibility or support needs.

6. Redaction and withholding

- 6.1. Zen may redact or withhold information where it is lawful and reasonable to do so. This may include information involving personal data, confidential third-party information, legal privilege, commercial sensitivity, health and safety risks, safeguarding concerns, security risks, or where disclosure would conflict with another statutory requirement. STAIRs does not override data protection, confidentiality, safeguarding, legal privilege or other statutory restrictions.
- 6.2. Each decision to redact or withhold information must be proportionate, evidence-based and recorded. Records should explain the information considered, the reason for the decision, whether partial disclosure was possible and who approved the decision.
- 6.3. Where information is redacted or withheld, Zen will explain the reason to the resident in clear terms, unless doing so would itself disclose sensitive or protected information.

7. Accessibility and support

- 7.1. Zen will aim to make STAIRs information clear, accessible, relevant and timely. Information should be written in plain language wherever possible and published in a way that is easy for residents to find. Information published will be dated.
- 7.2. Zen will provide reasonable support where residents need information in a different format, need help using online services, or require communication adjustments because of individual needs.

8. Roles and responsibilities

- 8.1. The Board is responsible for approving this policy and receiving assurance that Zen has effective arrangements for compliance with STAIRs.



- 8.2. The Operations or Executive Director is responsible for senior oversight of STAIRs compliance and for ensuring that sufficient arrangements are in place for publication, request handling, redaction decisions and resident communications.
- 8.3. The Head of Governance and Compliance, or nominated policy lead, is responsible for maintaining the publication scheme, coordinating responses to information requests, keeping records of decisions, and reporting assurance to senior management and the Board.
- 8.4. Service leads are responsible for identifying information held within their areas, confirming whether information remains current, advising on sensitivity or risks, and providing content for publication or response to requests.

9. Reviews, complaints and escalation

- 9.1. Residents may ask Zen to review a decision where they believe relevant information has not been published, has been unnecessarily redacted or withheld, or should be made available in a different accessible format.
- 9.2. Zen will consider review requests through its STAIRs review process and provide a clear explanation of the outcome within a reasonable published timeframe. Where appropriate, the outcome may include publication of additional information, provision of information directly to the resident, confirmation that the information is not held or an explanation of why information has been redacted or withheld.
- 9.3. Where a resident remains dissatisfied with the outcome of a review, they may raise the matter through Zen's published complaints process. Information about further escalation, including access to the Housing Ombudsman Service where applicable, is set out within that process.
- 9.4. Any relevant findings or determinations arising through the complaints or Housing Ombudsman process will be considered and acted upon as appropriate.

10. Records and monitoring

- 10.1. Zen will keep proportionate records of publication scheme reviews, information requests, redaction and withholding decisions, review outcomes and any escalation to the Housing Ombudsman Service.

- 10.2. Management information will be reported periodically to senior management and the Board. This may include the number and type of requests received, timeliness of responses, themes arising, review outcomes, complaints, learning and any changes needed to the publication scheme.
- 10.3. The Board will receive annual assurance on Zen's compliance with STAIRs. This will include confirmation that the publication scheme has been reviewed and remains up to date, that information requests and review requests have been handled within expected timescales, that decisions to redact or withhold information have been recorded and approved appropriately, and that any learning from requests, complaints, Housing Ombudsman outcomes or changes in guidance has been considered and acted upon.

11. Background documents

11.1. This policy should be read alongside the

- Social Tenants Access to Information Requirements; policy statement (DLUHC)
- Zen's publication scheme;
- Complaints policy; and
- Data Retention and Disposal Policy.

12. Policy management

- 12.1. The publication scheme will be reviewed annually by the lead responsible person to ensure information is kept up to date and accessible.
- 12.2. This policy will be reviewed at least every three years, and sooner if there are changes to legislation, STAIRs requirements, regulatory expectations, the Housing Ombudsman's approach, Zen's operating arrangements, or learning from requests, reviews or complaints.