



Social Tenant Access to Information Requirements (STAIRs) Policy

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Owner	Head of Data & Insight
Author	Data Protection Manager
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Applicable Curo strategic objective(s)	☐ Quality Homes ☒ Purposeful Culture ☒ Trusted Customer Services ☐ Collaboration and Growth ☒ Solid Foundations

Control information	Control detail
Applicable legislation, regulations or external standards	• Social Housing Regulation Act 2023 • UK GDPR • Data Protection Act 2018 • Equality Act 2010
Related internal resources	• Information Register • Content Governance Framework (STAIRs) • Review Process (STAIRs)

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1. Introduction

- 1.1. This policy explains how Curo's tenants can access information about us and sets out how Curo will comply with the Social Tenant Access to Information Requirements (STAIRs), introduced under the amended Transparency, Influence and Accountability (TI&A) Consumer Standard. By implementing this policy, Curo promotes transparency, accountability and tenant empowerment, enabling tenants and their representatives to understand how services are delivered and how decisions are made.
- 1.2. STAIRs is designed to enable tenants and their designated representatives to be able to access information which supports tenants to know more about how their services are delivered, either through information disclosed as part of a formal publication scheme or by responding to specific requests for information from tenants.
- 1.3. We will ensure that this policy is applied in line with our core Values (Curo is Caring, Respectful, Open, Fair and Trusting).

2. Scope

- 2.1. This policy applies to all Curo colleagues, including permanent, temporary and agency staff, as well as third party organisations contracted to deliver social housing services on Curo's behalf. It governs all activities relating to the proactive publication of information, the handling of Information Requests submitted by tenants or their designated representatives, and the review and complaints processes associated with STAIRs.

3. Definitions

- 3.1. **Consumer Standards:** Standards issued by the Regulator of Social Housing that set expectations for how providers must deliver services.
- 3.2. **Designated Representative:** Any individual chosen by a Tenant to act on their behalf for the purpose of making an Information Request.
- 3.3. **Information Request:** A written request submitted under Phase 2 of STAIRs by a Tenant or their representative, seeking information relating to the management of social housing. The right for Tenants to submit Information Requests under STAIRs takes effect from 1 April 2027.

- 3.4. **Information Register:** The organisation-wide inventory of the documents, datasets and information assets held by Curo related to the management of social housing specifying what is included in Curo's Publication Scheme and what is not. A rationale is provided for any information deemed out of scope.
- 3.5. **Phase 1:** The requirement under STAIRs to introduce a Publication Scheme from 1 October 2026.
- 3.6. **Phase 2:** The requirement under STAIRs to respond to information requests from tenants and their representatives from 1 April 2027.
- 3.7. **Policy Statement:** The regulatory instrument implementing STAIRs. It outlines the requirements that Private Registered Providers (PRPs) must meet relating to the sharing of information and the circumstances when they can withhold it.
- 3.8. **Publication Scheme:** A structured and proactive framework through which PRPs are required to publish information under Phase 1 of STAIRs. This requirement takes effect under STAIRs from 1 October 2026.
- 3.9. **Relevant Information:** Information relating to Curo's management of social housing that falls within the scope of STAIRs.
- 3.10. **STAIRs:** Social Tenant Access to Information Requirements, introduced under the amended Transparency, Influence and Accountability (TI&A) Consumer Standard.
- 3.11. **Tenant:** Any individual who is a current social housing tenant of Curo Places Limited or Curo Group (Albion) Limited. This includes licensees and Shared Owners who own less than 100% of their property's equity.
- 3.12. **TI&A Standard:** The Transparency, Influence and Accountability Consumer Standard issued by the Regulator of Social Housing.

4. External references

- 4.1. **Social Tenant Access to Information Requirements (STAIRs):** This policy is underpinned by the Social Tenant Access to Information Requirements (STAIRs) Policy Statement issued by the Ministry for Housing, Communities and Local Government in 2025, and by the amended TI&A Standard issued by the Regulator of Social Housing. When assessing whether information should be withheld or redacted, Curo must have due regard to

the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

- 4.2. **National Housing Federation (NHF):** This policy has been developed to align with guidance produced by the National Housing Federation (NHF) and will be reviewed at least annually to ensure we follow good practice and any further guidance from the NHF and/or from the Housing Ombudsman.

5. Responsibilities

- 5.1. **Executive Director Corporate Services:** Overall accountability for this policy rests with the Executive Director Corporate Services who is responsible for STAIRs compliance. The Executive Director Corporate Services has final authority to approve the Publication Scheme, its annual review and any ad hoc updates to it.
- 5.2. **Data Protection Manager:** Day-to-day implementation is delegated to the Data Protection Manager, who is responsible for maintaining the Information Register and the Publication Scheme, overseeing the Information Request process and coordinating internal reviews.
- 5.3. **All colleagues:** Required to understand and comply with this policy and to support Tenants who may need assistance in making a request. Third party providers delivering services on Curo's behalf must cooperate with Curo by supplying information they hold within reasonable timeframes, recognising Curo's duty to comply with STAIRs.

6. Publication Scheme (Phase 1)

- 6.1. Curo will proactively publish information relating to the management of its social housing in accordance with the classes of information set out in the STAIRs Policy Statement. The seven core classes are: Governance and Decision Making, Spending, Housing Stock Management, Performance, Housing Services, Lists and Registers and Social Housing Management.
- 6.2. By 'publish' we mean make available on our website in a clear way. If information is required to be provided in a different accessible alternative format, a single copy of any published information will be provided free of charge upon request, although additional copies to the same Tenant may incur charges.

- 6.3. Where the information class involves content that is highly specific to individual properties or blocks, we will usually publish summarised information so Tenants can identify trends, make comparisons and ask us questions. More specific information, for example at tenancy or property or block level, will be provided where relevant in response to an Information Request.
- 6.4. Certain categories of information fall outside the scope of the Publication Scheme, either because the information is not held by Curo or because the information does not fall within the classes defined in the Policy Statement. Appendix 1 of this policy sets out a list of information classes we deem to be out-of-scope. This list is not exhaustive.

7. Information Requests (Phase 2)

- 7.1. Curo will accept Information Requests from Tenants or their designated representatives, provided the request is made in writing and the identity of the requester can be verified. Requests may be submitted by email, text message, social media message or letter. Curo will acknowledge receipt within 5 calendar days and will provide a full response within 30 calendar days of receiving the request or any necessary clarification. Extensions will only be applied in exceptional circumstances and will be reasonable and clearly communicated to the requester.
- 7.2. Curo will support Tenants who require assistance to make a request. Where information is held by a third party acting on Curo's behalf, Curo will take reasonable steps to obtain it and will maintain logs of all such enquiries.
- 7.3. When disclosing information, Curo will take all reasonable steps to ensure that information is provided in a format which is accessible to the Tenant making the request.

8. Redacting or Withholding Information

- 8.1. It may be necessary to redact or withhold information prior to publication or in response to an Information Request.
- 8.2. When considering whether information should be redacted or withheld, Curo will have due regard to Data Protection legislation and commercial sensitivity. Curo will balance the benefits of disclosure against the likelihood and severity

of harm and will record its reasoning. We will usually withhold and/or redact personal information.

- 8.3. Curo may refuse to respond to an Information Request where it is reasonable to withhold the information, where disclosure may cause harm, where the requester's identity cannot be verified or where the request is unclear and clarification is not provided. Requests may also be refused if the information is not relevant under STAIRs, if responding would require more than 18 hours of colleague time, if the request is repeated or if it is offensive or communicated in an abusive manner.
- 8.4. Curo is not required to create new information to comply with either the Publication Scheme (Phase 1) or Information Requests (Phase 2).

9. Data Protection

- 9.1. Information that constitutes personal data will not usually be disclosed under STAIRs. Where a Tenant seeks access to their personal data, the request will be processed as a Subject Access Request (SAR) in accordance with data protection legislation and Curo's Data Protection Policy.

10. Review and Complaints Process

- 10.1. Tenants may request a review if they believe Curo has failed to proactively publish required information, has not responded appropriately to an Information Request, has incorrectly withheld or redacted information or has not met required timelines.
- 10.2. A request for a review of a response to an Information Request under Phase 2 must generally be received within 3 months of receipt of that response. A request to review the information that we publish under Phase 1 can be made at any time. Requests for review under Phase 1 or Phase 2 should be sent to privacy@curo-group.co.uk.
- 10.3. Curo will complete an internal review within 30 calendar days of receipt of a request for review, unless an extension is necessary in exceptional circumstances.
- 10.4. If the Tenant remains dissatisfied, they may escalate their complaint to the Housing Ombudsman within three months of receiving the review outcome.

- 10.5. Note that if a Tenant's concern relates to an alleged breach of data protection legislation, it will be dealt with via Curo's complaints process for data protection matters.

11. Monitoring and Review

- 11.1. Curo will review this policy and the Publication Scheme annually to ensure continued compliance and accuracy. Reviews will also take place on an ad hoc basis where there are significant changes, for example in legislation, governance or social housing management policy. Logs of Information Requests and response times will be maintained for reporting, assurance and accountability purposes.

Appendix 1: Out of Scope Information (not an exhaustive list)

1. Internal business or commercial activities

- 1.1. Contracts or agreements unrelated to the provision of housing management services (e.g. payroll services).
- 1.2. HR policies unrelated to social housing management (e.g. disciplinary policy).
- 1.3. Finance policies governing day to day business operations unrelated to the provision of housing management services.
- 1.4. Investment strategies relating to non-social or private housing.
- 1.5. Information which relates to internal discussions and the development of internal policy and strategy before board approval ('pipeline information').

2. Matters decided by local authorities

- 2.1. Housing allocations.
- 2.2. Homelessness assessments.
- 2.3. Housing benefit or council tax-related decisions.
- 2.4. Planning applications and planning enforcement actions.

3. Non-social housing management function

- 3.1. Service charges for non-social housing.
- 3.2. Commercial lease management.
- 3.3. Repairs or safety data for market rent homes.
- 3.4. Private rented sector portfolios managed for profit.

4. Property that is not social housing

- 4.1. Leasehold properties.
- 4.2. Shared ownership schemes where the shared owner has staircased to own 100% of property equity.
- 4.3. Shops; offices; community centres.
- 4.4. Moorings, storage units or other non-residential lets.
- 4.5. Any build-to-rent or for-profit schemes held separately from Curo.

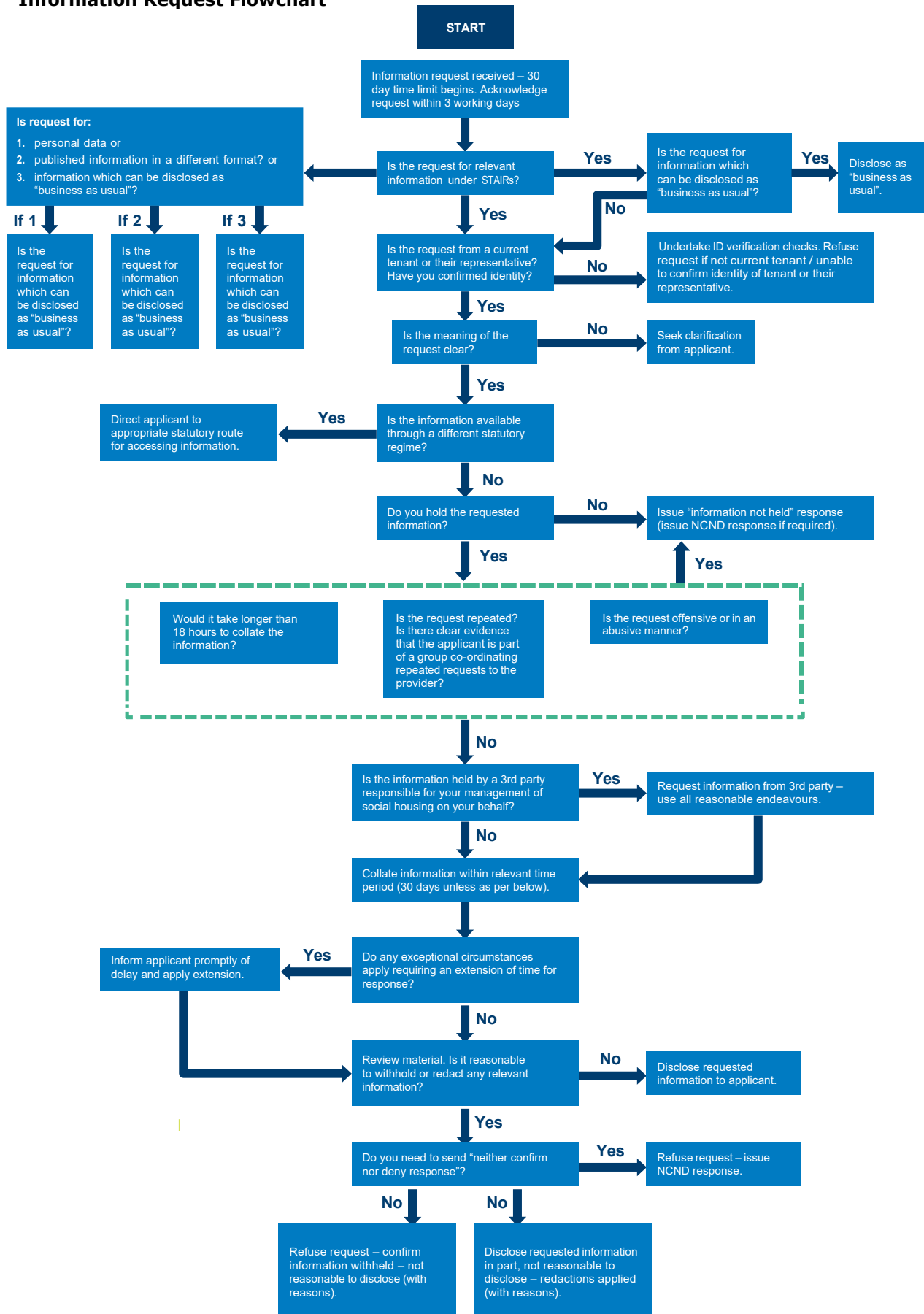
5. Wider activities unconnected with social housing

- 5.1. Group level commercial ventures – e.g. renewable energy subsidiaries, trading companies, joint ventures for private sale developments.
- 5.2. Care and support contracts delivered on behalf of local authorities (for care and support only).
- 5.3. Commercial investment or treasury activities.

Appendix 2: Information Request Flowchart

Appendix 2

Information Request Flowchart



Version control

Version number	Update type	Update summary	Updated by	Update date
1.0	Full review	First version created	Data Protection Manager	01 August 2026