Social Tenant Access to Information Requirements (STAIRs)
October 2026

Owner: Head of Governance & Assurance

Version No.	Purpose/Changes	Approval Date	Approved By	Suggested Review Date
V1.0	New policy	October 2026	Customer Focus Committee	2027/2028

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1. Our policy…

1.1 Ongo is committed to being open, transparent and accountable to our tenants. Making information easily accessible helps tenants understand how decisions are made, scrutinise performance, influence services and hold Ongo to account.

1.2 The Social Tenant Access to Information Requirements (STAIRs) give tenants the right to access information about how their homes and services are managed.

1.3 This policy sets out how we will:

- Proactively publish information (Publication Scheme)
- Respond to requests for information from tenants
- Respond to complaints in relation to STAIRs from Ongo Homes tenants

1.4 We recognise that providing accessible, timely, and clear information:

- Builds trust
- Supports tenant scrutiny
- Improves services

2. It applies to…

2.2 This policy applies to Ongo Homes tenants only and relates to the management of Social Housing. It does not relate to the activities of our subsidiaries not engaged directly in social housing.

2.3 STAIRs does not apply to information about property or services that are not part of Ongo's social housing function. Examples of this include commercial lease management, leasehold properties, shared ownership arrangements with the owner owning 100% of the property equity, and offices. STAIRs does not include matters that are decided by a local authority (such as homelessness or, universal credit assessments).

2.4 Ongo is not subject to Freedom of Information (FOI) legislation. Information can only be requested by our Social Housing Tenants or nominated representative.

3. Because we want to…

3.1 The aims of this policy are to ensure that:

- We comply with Social Tenant Access to Information Requirements (STAIRs) and the Regulator of Social Housing's Transparency, Influence and Accountability Standard
- Be open and transparent with our tenants
- Provide tenants with meaningful information about how we manage our social housing and services
- Provide accessible information in formats that are easy to access and understand
- Have a proactive approach to publishing information wherever possible without requiring tenants to submit additional requests

- Explain decisions and provide reasons where information cannot be disclosed
- Balance transparency with our legal obligations, protecting privacy and confidentiality

4. What STAIRs requires...

4.1 STAIRs is a new standard introduced by the Government to enhance transparency for tenants of social housing providers. It is designed to enable tenants or their designated representative to be able to access information which supports understanding of how their services are delivered. To comply with this, we are required to:

Publish information proactively

Through a publication scheme, we will make key information routinely available. This information can be viewed from our website and will be extended when information becomes available. We are not required to create new records to comply with the publication scheme. The main elements of the publications scheme include:

Governance And Decision Making	Senior staff names and roles, organisational structure and governance arrangements. Decision making processes and policies, prioritisation of complaints, information on tenant consultations (including methodology), tenant meeting minutes and agendas
Spending	Spending, grants, use of service charge revenue
Housing Stock Management	Plans, maintenance work, progress towards net zero, stock transfers
Performance	Inspections outcomes, ratings, performance reviews, evaluation reports, Tenant Satisfaction Measures, media releases, complaint metrics, information request data, health and safety performance and assessments, maintenance work, number of evictions
Housing Services	Description of services, advice, and guidance for tenants
Lists And Registers	Information held in registers required by law and other lists and registers relating to the management of social housing
Social Housing Management	Policies and strategies relating to the management of social housing.

Information published under the scheme will be accurate, accessible and up to date. We will make reasonable adjustments to ensure all tenants can exercise their STAIRs rights regardless of disability, language needs or communication preferences. Information Owners from each service area will be responsible for ensuring the information meets requirements.

Respond to tenant requests for information

From April 2027, tenants or designated representative are able request information from Ongo relating to the management of social housing. All requests must be in writing and clearly describe the information requested. A tenant or their designated representative does not have to mention STAIRs for the requirements under STAIRs to apply.

We will acknowledge the request with 3 working days and respond within 30 calendar days from receipt. We may contact the requester to clarify the information required. Further time may be required in the following circumstances:

- to consider whether it is reasonable to withhold the requested information
- to arrange access to relevant information held by a body/person responsible for the management on behalf of Ongo.

5. We will...

- Act openly and transparently
- Respond to requests within timescales
- Signpost tenants to other information resources relevant to their request where information is already available
- Provide information in an accessible format
- Support tenants who need help making a request
- Where a request is refused, clearly explain the reasons why
- Where information has been redacted, clearly explain the reasons why
- Ensure colleagues are trained in STAIRs requirements
- Maintain a robust process and keep accurate records of:
    - Requests
    - Responses
    - Decisions

6. Exemptions and limitations ...

6.1 There are circumstance where we may withhold information where disclosure would:

- Breach data protection law (UK GDPR / Data Protection Act 2018)
- Prejudice legal proceedings or investigations
- Reveal commercially sensitive information
- Put individuals' safety at risk
- Conflict with other legal obligations

6.2 Where information is partially disclosable, we will apply redactions where appropriate.

6.3 We may refuse an information request where:

- the identity of the applicant cannot be established
- the information requested is not relevant information (not related to the management of social housing or managed by Local Authorities)
- where records do not exist, we are not required to create information to meet the request.
- the work involved with responding to the information request would exceed 18 hours of time.
- the request is repeated, including where a registered provider receives repeated requests from multiple applicants acting in coordination
- the request is offensive or communicated in an abusive manner

6.4 We will only withhold information where it is reasonable to do so in the circumstances. In assessing reasonableness, we will take account of all relevant factors, including any legal restrictions on disclosure, the rights and interests of third parties, and any clear and demonstrable risk of harm arising from disclosure

7. Sharing information…

7.1 We will only share information:

- Lawfully
- Securely
- In line with data protection requirements

7.2 Where third parties hold information on our behalf, we remain responsible for disclosure decisions.

8. Individual's Rights and Requests…

8.1 STAIRs works alongside existing rights, including:

- Subject Access Requests (SARs)
- Complaints procedures
- Safeguarding and confidentiality obligations

8.2 Where requests overlap, we will manage them under the most appropriate legal framework.

8.3 **Your Right to appeal**

8.3.1 Where a tenant is dissatisfied with the handling or outcome of their information request, they should make a complaint through our complaint process.

8.3.2 The timescale for a review is 30 days, please refer to our Complaints Policy for further information. If still dissatisfied with our response to the review, this can be escalated this to the Housing Ombudsman under the terms of the Housing Ombudsman Scheme.

9. Roles and responsibilities

Role	Responsibilities
Ongo Homes Board	• Oversight of compliance. • Reviewing annual assurance.
Customer Focus Committee	• Monitoring transparency performance. • Reviewing annual STAIRs reports.
Executive Leadership team	• Ensuring organisational compliance.
Head of Governance & Assurance	• Policy ownership. • Annual reporting.
Legal Manager	• Act as STAIRs lead officer • To oversee requests and ensure that the publication or requests for information do not breach Data Protection legislation • Assessing reasonableness
PR & Communications Team	• Publish or update information from information owners in a timely manner • Ensuring information is available in an accessible format • Development of the Stairs Webpage
Information Owners	• Ensuring information is accurate and up to date • Co-operating with requests in a timely manner • Following Data Protection requirements • Ensuring Information is available is an accessible format
Nominated STAIRs champion	• Respond to requests for information in a timely manner • Supporting other colleagues in their area with STAIRs awareness
All colleagues	• Recognising and cooperating with requests. • Following policy requirements.

10. Making sure we do what we say...

To ensure compliance, Ongo will:

- Appoint a STAIRs lead officer
- Monitor request volumes and response times
- Audit compliance periodically
- Report performance through governance structures
- Train colleagues on transparency and information handling

11. Other things to bear in mind...

11.1 This policy also links to our:

- Information Security and Acceptable Use Policy
- Data Protection Policy
- Data Retention Policy
- Data Protection Breach Procedure
- Subject Access Request Procedure
- Data Portability Procedure

- Right to Erasure Procedure
- DBS Procedure
- CCTV Procedure
- Media Policy
- Safeguarding Policy & Procedures
- Procurement Policies and Procedures

12. We'll look at this again...

12.1 In 3 years' time, or earlier should any changes to legislation or regulation occur.