

Social Tenant Access to Information Requirements Scheme (STAIRS) Policy

Policy Reference	GRP001
Approved by	Ocean Housing Board
Approved Date	16/09/2026
Review Date	16/09/2028
Responsible Board	Ocean Housing Board
Responsible Executive	Executive Director of Governance Risk and Performance

References and Engagement

Related Policies and Procedures	• Data Protection Policy • Compliments and Complaints Policy • Customer Voice and Engagement Strategy
Who this policy applies to	Ocean housing tenants, leaseholders, shared owners and staff
Customer Engagement	No engagement required
Equality Impact Assessment Date (if applicable)	Click or tap to enter a date.
Legislation/Regulation Referenced	• Social Housing (Regulation) Act 2023 • Social Tenant Access to Information Requirements (STAIRs) • UK GDPR / Data Protection Act 2018 • Regulator of Social Housing Consumer Standards
Performance Monitoring	☐ Tenant Satisfaction Measures (TSM) ☐ OHL Performance Bulletin ☐ SLT Performance Bulletin ☒ Internal Monitoring/Compliance ☐ Other (please specify)

Location and Version Control

Document Location	Ocean Housing Intranet & Website
Version	1.0

1.0 Purpose

- 1.1 This policy applies to Ocean Housing staff, contractors and service areas involved in publishing information, handling STAIRs information requests, or completing STAIRs reviews.
- 1.2 The purpose of this policy is to:
 - Ensure transparency in how Ocean Housing operates
 - Support tenants to understand decisions, performance, and services
 - Enable tenants to hold Ocean Housing to account
 - Ensure compliance with STAIRs requirements
- 1.3 This policy sets out how Ocean Housing will comply with the STAIRs Policy Statement, including:
 - **Chapter 1:** Proactive publication of information through a publication scheme
 - **Chapter 2:** Responding to tenant information requests, including reviews and complaints

- Whilst this policy supports openness and transparency for all customers, the statutory STAIRs scheme applies only to eligible tenants as defined within the national STAIRs framework. STAIRs does not apply to leaseholders who own 100% of their property, resident associations making a group request, or tenant panels/resident associations acting collectively.
- 1.4
 - 1.5 This policy reflects the requirements of the Transparency, Influence and Accountability Standard and operates alongside UK GDPR, the Data Protection Act 2018, and relevant information law principles. It also supports Ocean Housing's commitment to openness, accountability, and high-quality service delivery for customers and stakeholders.

2.0 Policy Statement

- 2.1 Ocean Housing is committed to being open, transparent, and accountable in all aspects of its operations.

2.2 STAIRs Principles

Ocean Housing will apply the following principles:

- Transparency and openness in all decision-making
- Accountability to tenants and stakeholders
- Tenant involvement in shaping what information is published
- A presumption in favour of disclosure, unless there is a clear legal or reasonable basis to withhold information

2.3 We will:

- Publish clear, accessible information about how we manage homes and services
- Respond to tenant information requests in line with STAIRs requirements
- Ensure tenants can easily access and understand information

2.4 Our approach includes:

- A publication scheme setting out information routinely available
- A defined process for handling information requests
- Clear governance and accountability arrangements
- Integration with complaints, performance, and engagement frameworks

2.5 Implementation milestones:

From 1 October 2026: Ocean Housing will proactively publish information through a structured publication scheme (Chapter 1)

From 1 April 2027: Ocean Housing will respond to tenant information requests within statutory timescales (Chapter 2)

2.6 Decision-making principles:

- Information will be disclosed unless there is a clear legal or reasonable basis to withhold it
- Decisions to withhold or redact information will be based on a balanced assessment of disclosure versus potential harm
- Decisions will have due regard to data protection, confidentiality, and relevant legislation
- Decisions will be documented and justified

2.7 Ocean Housing will not take into account:

- The identity of the tenant
- The reasons for the request
- The intended use of the information

2.8 Communication and engagement:

- Information will be published via the website and tenant portal
- Alternative formats will be provided where required
- Tenants will be involved in reviewing and improving transparency
- Tenants will be supported to understand information, including provision of explanations or summaries where appropriate

2.9 Third-party arrangements:

- Contractors and managing agents must supply relevant information to Ocean Housing where required
- Ocean Housing retains overall accountability for compliance with STAIRs

3.0 Definitions

3.1 STAIRs

Social Tenant Access to Information Requirements - a regulatory framework requiring housing providers to publish information and respond to tenant requests.

3.2 Publication Scheme

A structured set of information that Ocean Housing makes available routinely without needing a request.

3.3 Information Request

A request made by a tenant (or representative) for information not already published.

3.4 Tenant

Any person who occupies a property managed by Ocean Housing under a tenancy agreement and who is eligible to make a request under the Social Tenant Access to Information Requirements (STAIRs).

STAIRs does not apply to:

- leaseholders who own 100% of their property;
- resident associations making a group request; and
- tenant panels or resident associations acting collectively.

Eligibility for STAIRs will be determined in accordance with the prevailing statutory requirements and associated guidance.

3.5 Former Tenant

A person who was previously an eligible Ocean Housing tenant and who made a STAIRs information request or requested a STAIRs review whilst they were still a tenant.

3.6 Personal Data

Information relating to an identifiable individual, protected under UK GDPR.

3.7 Redaction

The removal of sensitive or restricted information prior to disclosure.

3.8 Relevant Information

Information relating to the management of Ocean Housing's social housing services. This excludes information outside the scope of the social housing function or subject to lawful exemption.

4.0 Approach and Standards

4.1 Publication of Information

Ocean Housing will publish information covering:

- Governance and decision-making
- Financial and spending information
- Housing management and asset data
- Performance and tenant satisfaction
- Policies and service standards

- 4.2 Ocean Housing will take a proactive approach to identifying and publishing information, working with tenants where appropriate to ensure the publication scheme reflects tenant priorities.

- 4.3 Ocean Housing is not required to create new records solely to meet STAIRs requirements. Information will be published where held and where it falls within the relevant publication categories, subject to lawful and reasonable redaction where required.

4.4 Information will:

- Be kept up to date
- Be accessible through digital and alternative formats
- Be reviewed regularly to ensure information remains accurate, current and accessible.

4.5 Responding to Information Requests

Ocean Housing will:

- Accept requests in writing (including email or digital channels)
- Acknowledge requests promptly
- Respond within 30 calendar days

4.6 Requests may be:

- Clarified where necessary
- Refused where they are unreasonable, excessive, or unlawful

4.7 Ocean Housing will not consider:

- The reason for the request
- How the information will be used

4.8 Information may be withheld where:

- It contains personal data
- It is commercially sensitive
- It could cause harm or risk
- Disclosure would breach legal obligations

Decisions to withhold or redact information will be made in line with the STAIRs reasonableness test, balancing the benefits of disclosure against the likelihood and severity of harm.

4.9 All decisions will:

- Be proportionate
- Be documented
- Be explained to the tenant

5.0 Roles and Responsibilities

5.1 Board / Committees

Staff

Must follow procedures and support information requests

Contractors / Third Parties

Must provide relevant information to Ocean Housing

Board / Committees

Provide oversight and assurance on transparency

Executive Team

Ensure compliance and resources are in place

Senior Manager (Policy Owner)

Accountable for policy implementation and review

6.0 STAIRs Reviews and Ombudsman Escalation

6.1 STAIRs Reviews

6.2 Tenants may request a STAIRs review where:

- they believe information should have been published under the publication scheme but has not been made available;
- they are dissatisfied with Ocean Housing's response to a STAIRs information request; or
- they have not received a response within the required timescale.

6.3 A STAIRs review is separate from Ocean Housing's standard complaints procedure and is not managed under the Housing Ombudsman Complaint Handling Code.

6.4 Internal Review Process

Ocean Housing will operate a defined review process for:

- Requests for information not published but believed to be in scope
- Dissatisfaction with the handling of or response to an information request

Reviews will:

- Be completed within 30 calendar days
- Be undertaken by a different officer to the original decision-maker
- Provide clear reasons for the outcome

This process is distinct from the standard complaints procedure and aligns with STAIRs requirements.

- 6.5 If a tenant remains dissatisfied following the completion of a STAIRs review, or where a review response is not provided within 30 calendar days, the tenant may refer the matter to the Housing Ombudsman in accordance with the Housing Ombudsman Scheme.

6.6 Housing Ombudsman Referral

- 6.7 Tenants will normally have three months following Ocean Housing's STAIRs review outcome, or from the date a response should have been provided, to refer the matter to the Housing Ombudsman.
- 6.8 Former tenants may refer a STAIRs matter where the original information request or review was made whilst they were still an eligible tenant.
- 6.9 The Housing Ombudsman may exercise discretion in accordance with its Scheme when considering referrals made outside these timescales.