



Housing Ombudsman Service Scheme Update Consultation

STAIRs – Changes to How Complaints Will Be Handled

G15 Residents' Group Response

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Response from: G15 Residents' Group

(G15RG)

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Introduction

The G15 Residents' Group (G15RG) represents residents across G15 housing associations. This response draws on the views expressed at the G15RG joint consultation meeting on the Regulator's consumer standards and the Housing Ombudsman Service (HOS) proposed changes to how it will consider complaints arising from STAIRs (Social Tenant Access to Information Requirements).

Our discussion focused on two proposed changes to the Scheme:

1. HOS considering complaints about information requests made under STAIRs, and
2. HOS considering complaints where a landlord fails to publish information required under a publication scheme.

Overall, residents express broad support for the principle of Ombudsman oversight, but emphasise concerns around capacity, consistency, fairness, accountability, and clarity of scope.

1. General Position

Overall response: Yes, with concerns.

Residents agree that it is *right in principle* for the Ombudsman to play a role where landlords fail to comply with transparency requirements mandated through STAIRs. We welcome a strengthened route for redress, especially where information failures have historically undermined trust and contributed to serious safety failings, as highlighted by residents during the Grenfell Tower Inquiry.

However, residents also note that the Ombudsman is already under significant strain, with backlog issues and determinations often taking years to be issued. There is concern that adding a substantial new complaint category may place additional pressure on the service, potentially reducing its ability to resolve core housing complaints swiftly and effectively. In this context, residents would also want to understand how the Ombudsman will interpret exemptions in practice and whether it will align with established guidance and precedent under the Freedom of Information Act 2000, given that the application of exemptions is often where the most complex decisions arise.

2. Residents' Key Themes

2.1 Ombudsman Capacity and Timeliness

Residents repeatedly raise concerns that the Ombudsman:

- is already “overloaded”, with determinations delayed by 1–2 years in some cases
- may not be sufficiently resourced to take on an additional statutory caseload linked to information rights
- may experience slower complaint handling overall, reducing confidence in the system and access to justice.

Resident view:

If the HOS becomes responsible for every disputed information request, it could collapse under the weight of additional work. While current volumes of access to information requests across the sector are relatively low, residents are concerned that the introduction of STAIRs could drive a significant increase in demand as awareness of new rights grows, and experience from the Freedom of Information Act 2000 suggests that proactive publication does not necessarily reduce requests for additional information.

Residents therefore request that the STAIRs implementation framework acknowledges the need for additional capacity, resourcing and a phased approach before implementation in 2027.

2.2 Consistency Across the Sector & Mixed-Tenure Safety Concerns

Residents raise longstanding concerns about unequal obligations across tenures - particularly in *mixed-tenure blocks*, where leaseholders and shared owners may not be required to undertake the same safety checks (e.g. electrical testing), creating real building-safety risks for neighbours.

Because STAIRs applies only to *landlord-held* information, residents fear:

- Leasehold activities may continue to fall outside the STAIRs regime
- landlords could be held responsible for information they do not legally hold
- residents in mixed blocks may continue to experience safety gaps.

Resident position:

Residents are concerned that describing STAIRs as a “single stage process” may cause confusion, as in practice it involves an information request, an internal review and escalation to the Housing Ombudsman. As residents and staff are more familiar with stage one and stage two complaints, terminology, clearer and more consistent language would be helpful.

The Ombudsman should explicitly consider tenure differences and safety implications when developing case-handling guidance.

2.3 Publication Scheme - Need for Uniform Templates

Residents strongly support uniform, consistent publication requirements, similar to their request to the Regulator.

Current landlord practice varies widely; some publish detailed performance data, others very little. A standardised

template would:

- ensure landlords cannot “bury” important information
- support meaningful comparisons
- make it easier for the Ombudsman to adjudicate publication failures.

Residents stress the need for accessible formats, recognising digital exclusion and language barriers.

2.4 Charging Residents for Information

Several residents are aware of landlords charging residents £50 or more to view or obtain documents (e.g. invoices), especially where offices have closed and visiting in person is no longer possible.

Residents are clear:

- STAIRs should prohibit charges that create barriers to information access.
- HOS guidance must explicitly state that fees for providing information are not permitted (except where legislation explicitly allows).

Otherwise, landlords could recreate the very inequalities STAIRs is intended to remove.

2.5 Managing Vexatious or Excessive Requests

We acknowledge the need for landlords to manage repetitive or malicious requests fairly - mirroring similar concerns raised during the Regulator’s consultation on consumer standards earlier in the year.

Residents agree that:

- clear thresholds should be set
- Ombudsman guidance must define “vexatious” proportionately
- safeguards must prevent landlords from misusing this label to avoid reasonable scrutiny.

Residents also consider it important to clarify opportunities for parties to submit further evidence or seek a review of determinations, particularly where complex issues of legal interpretation arise, such as exemptions or confidentiality.

2.6 Impact on Frontline Staff

Residents with professional housing experience highlight the emotional labour and risk faced by frontline teams; some experiencing verbal abuse, threats and trauma-related challenges daily.

Key points:

- STAIRs could increase pressure on frontline staff expected to triage or facilitate information requests.
- Ombudsman guidance should reflect that complaints should be about systemic transparency not individuals acting within poorly designed organisational processes.
- Training for staff on signposting and complaint-handling must accompany STAIRs rollout.

Residents also ask the Housing Ombudsman to clarify its evidence gathering approach for STAIRs complaints, including request format, scope and response times, as current information requests vary significantly and greater consistency

would support providers to respond effectively.

2.7 Contractor Accountability

Residents stress that many poor resident experiences arise from contractor behaviour, not the landlord directly, yet contractors fall outside both the Regulator and the Ombudsman's direct oversight. Practical considerations:

- Contractors often hold essential information (e.g. repair logs, safety certificates). This may create barriers if landlords cannot readily obtain and disclose this information to residents. STAIRs may create expectations landlords cannot meet unless contractors are contractually required to cooperate.
- Residents want assurance the Ombudsman will consider landlord oversight of contractors when handling STAIRs complaints.

3. Specific Feedback on the Ombudsman's Proposals

3.1 Complaints About Information Requests Under STAIRs

Overall response: Cautious support.

Residents welcome:

- a clear route for redress
- strengthened resident rights
- alignment with established HOS complaint-handling frameworks.

However, residents want:

- assurance on turnaround times, given current delays
- clarity on what constitutes "non-compliance"
- guidance on whether residents can escalate before landlord deadlines expire
- an appeals route if the Ombudsman decides a request *is* vexatious.

3.2 Complaints About Publication Failures

Residents firmly support Ombudsman jurisdiction here.

We emphasise the following:

- publication failures should be treated seriously
- the failure to publish should be categorised as maladministration where it impedes resident safety or scrutiny
- the Ombudsman should be empowered to order remedial actions, not just make findings.

Residents also want a public log of landlords found to have breached publication requirements.

4. Equality and Regulatory Impact Observations

Residents draw attention to groups who may be disadvantaged if transparency mechanisms fail:

- disabled residents
- residents with limited digital access
- neurodiverse residents
- older people
- residents with language barriers. Improving

transparency processes must include:

- multiple formats (online + paper + telephone)
- options for assisted requests
- safeguards for vulnerable residents making repeated information requests as part of support needs.

5. Conclusion

While the G15RG broadly supports the Ombudsman's oversight of STAIRs-related complaints, residents emphasise that implementation must address the real-world operational, safety, equality and capacity challenges identified.

We ask that the Housing Ombudsman Service:

1. Expands capacity ahead of 2027 to prevent further delays.
2. Introduces uniform publication templates for required STAIRs information.
3. Prohibits or tightly regulates charges for providing information.
4. Publishes clear guidance on vexatious requests and appeal routes.
5. Recognises tenure differences and safety risks in mixed-tenure blocks.
6. Requires landlords to demonstrate contractor compliance with STAIRs obligations.
7. Ensures accessible, inclusive processes for digitally excluded and vulnerable residents.
8. Publishes annual cross-sector learning on STAIRs-related decisions.

These reflections are offered to support a fair, effective and resident-centred approach to transparency and accountability in social housing.