

HOUSING SOLUTIONS

Board Report



Report to Board: 6 March 2024
Item 9.2: Complaints Annual Report 2023/24 [REDACTED TO REMOVE PERSONAL DATA AND CONFIDENTIAL INFORMATION FOR PUBLICATION]
Purpose: Information
Report From: Mary Swaine, AD of Governance & Corporate Compliance
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1.0 PROPOSED RESOLUTION:

1.1 The Board to note the annual complaints report for the 2023/2024 year to date including the performance, trends, drivers, and outcomes in our complaint handling and compliance with the Housing Ombudsman Code.

2.0 BACKGROUND:

2.1 As a member of the Housing Ombudsman Scheme we are required to comply with the Housing Ombudsman's Complaint-Handling Code. The Code is designed to support landlords resolve complaints quickly and effectively, embedding a positive complaint-handling culture and guiding residents on what they may expect from their landlord when making a complaint.

2.2 The original version of the Complaint-Handling Code was published in 2020 and then updated on 1 April 2022. On 8 February 2024 the Housing Ombudsman published a new draft version of the Code following earlier consultation on changes aimed at strengthening the rights of complainants' and facilitating good complaints outcomes. The new Complaint-Handling Code comes into effect on 1 April 2024.

2.3 We have conducted a gap analysis against the new Code and consulted on necessary changes with colleagues and residents. The outcome of the gap analysis, consultation and policy review is presented in the Complaint Policy update elsewhere on the Agenda.

2.4 As a member of the Housing Ombudsman Scheme we are required to self-assess against the Code on a 'comply or explain' basis annually. Our last annual self-assessment was approved by the Board on 19 July 2023. With introduction of the new Code on 1 April 2024 landlords must return their self-assessment, (for the first time) this Annual Complaints Report and its response from the Board, to the Housing Ombudsman at the same time as submitting their Tenant Satisfaction Measures i.e by 30 June 2024. The Board will be asked to approve Housing Solutions' self-assessment against the new Code at the 17 May 2024 Board meeting.

2.5 Our existing complaints process is summarised in the Table below:

Stage 1	Stage 2	Stage 3
Investigated by Complaints Team	Investigated by appropriate manager	Investigated by complaints panel: (Board member, resident representative & relevant Director)
Response within 10 working days of complaint receipt	Response within 20 working days of complaint receipt	Response within 10 working days of panel meeting

HOUSING SOLUTIONS

Board Report

Resident has 21 days to escalate their complaint if unhappy with outcome

3.0 CHANGES TO COMPLAINTS TEAM

- 3.1 A dedicated complaints team was established within the Corporate Services department at the end of June 2023 to drive improvements in our complaint-handling in terms of turnaround times, satisfaction with our complaint-handling and understanding root causes and lessons from our complaints. The team acts as a single point of contact for all stage 1 complaints and supports managers and complaint panels in resolving stage 2 and 3 complaints. Our dedicated team meets the Housing Ombudsman's requirement for landlords to have at least one 'dedicated complaints officer' in the organisation.
- 3.2 The complaints team is now fully resourced following recruitment of a Complaints & Governance Co-ordinator in January 2024, working alongside our existing Complaints Manager who joined us in June 2023. Both members of the complaints team report to the AD of Governance & Corporate Compliance who reports to the Chief Executive.
- 3.3 The team has delivered key improvements in the quality of our complaints service as covered in this report. With these improvements in place, the team is focused on addressing the root cause(s) of complaints, supporting teams to institute the necessary improvements (whether they be communication, policy, process, training, contract management or other related improvements) to improve the way residents receive and interact with our services.

4.0 COMPLAINT DRIVERS

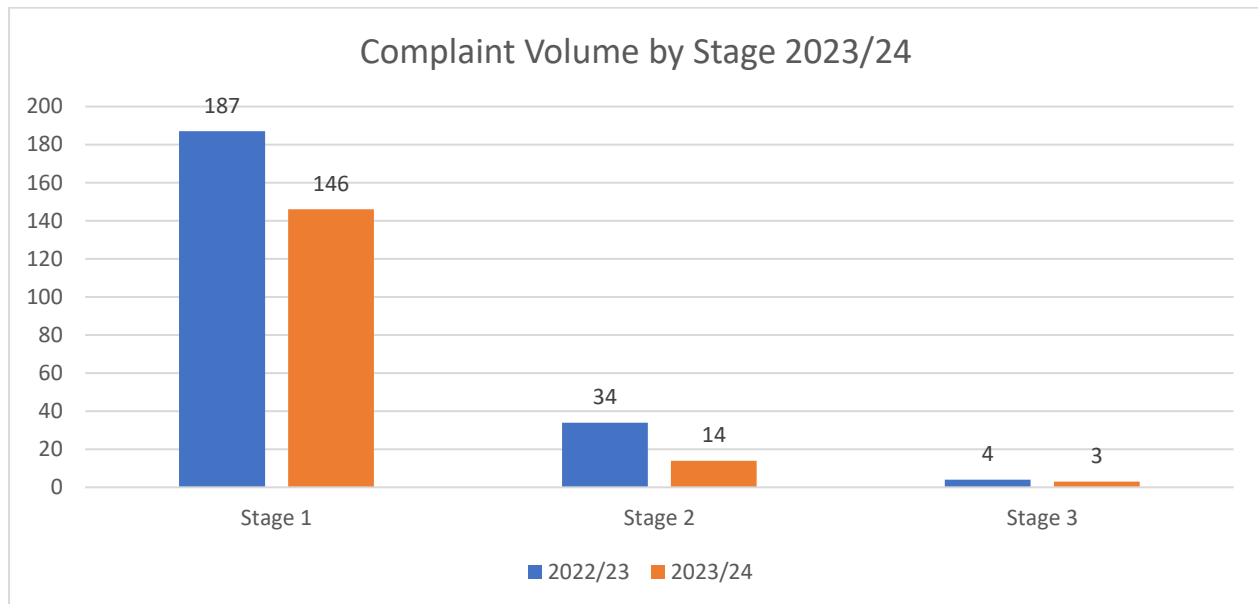
- 4.1 Throughout the 2023/24 year, the key drivers of formal complaints remained broadly consistent with previous trends:
- **Communication:** failure to respond to residents within required timescales, inconsistent messaging/guidance given and poor quality written & verbal communication.
 - **First time Fix:** completing repairs or providing service resolutions at the first contact
 - **Timescales:** completing repairs, resolving ASB issues and responding to residents as promised and/or in a timely manner
 - **Contractors** : performance issues with contractors in terms of missed/delayed appointments, quality of work & poor communication.
 - **Tenancy Management** : dealing effectively with low-level ASB, parking and more visible neighbourhood management

5.0 COMPLAINT VOLUMES

- 5.1 The chart below shows our overall complaint volumes and movements between 2022/23 and 2023/24. We have seen a 22% fall in recorded complaints from 187 (2022/23) to 146 (2023/24). A significant driver for this has been higher satisfaction with our stage 1 complaint outcomes (see also section 8 below), following the specialisation of stage 1 complaint handling to the complaints team. This has resulted in a 50% fall in escalations to date this year.

HOUSING SOLUTIONS

Board Report



5.2 We had three complaints escalated to stage 3 of our process in 2023/24 where the Senior Independent Director chaired all three complaint panel meetings. [CONTENT REDACTED FOR PUBLICATION]

5.3 All three stage 3 complaints included poor communication as a pervasive theme; in particular: the tone and quality of written and verbal communication and consistency of messaging to residents on policy and process. [CONTENT REDACTED FOR PUBLICATION].

5.4 Complaint Volume Benchmarking

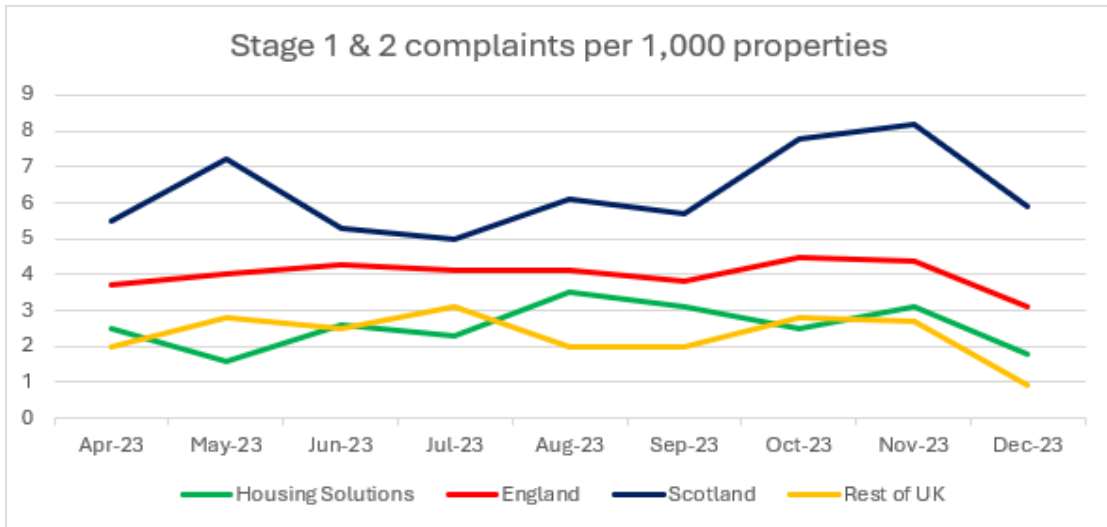
We advertise our complaints policy to residents principally via our website. Anyone receiving a service from Housing Solutions can make a complaint to us through a variety of routes - in person, by phone, by email, by webchat, by website or in writing to any member of Housing Solutions staff.

5.5 We continue to receive complaint numbers in lower volume than our sector peers. The line graph below provides Housemark benchmarking for stage 1 and 2 complaints relative to stock size over the period April to December 2023.

The sector average for complaints logged for providers in England is between 3 and 4 complaints per 1000 properties per month. Housing Solutions' average over the period was 2.5 complaints per 1000 properties per month, comfortably below the sector average. The graph shows the seasonal drop-off in complaints for all providers over the festive period.

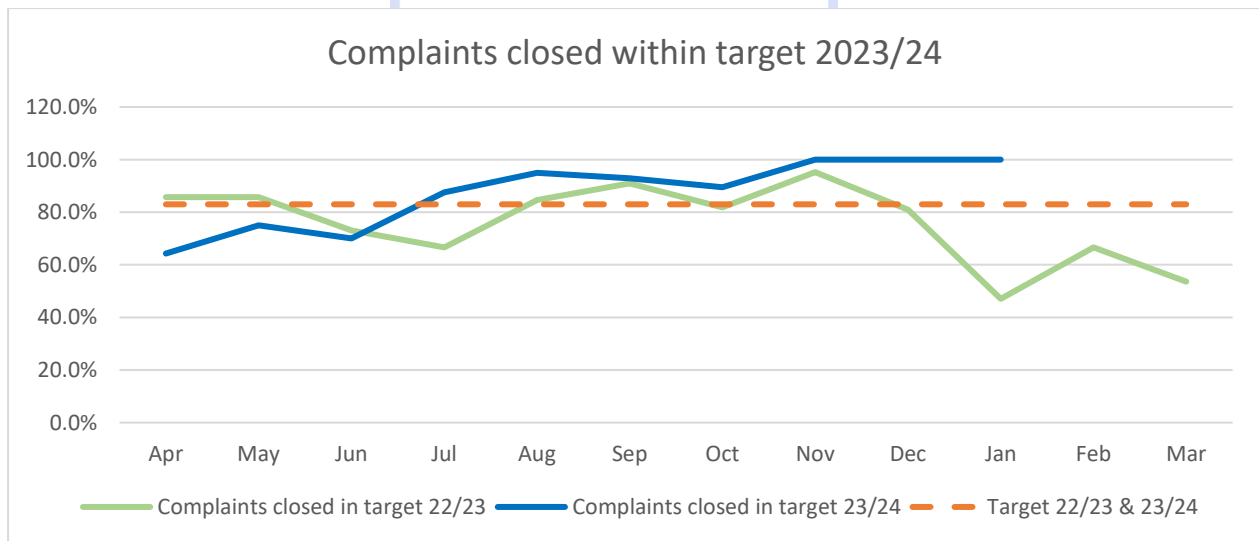
HOUSING SOLUTIONS

Board Report



6.0. SPEED OF COMPLAINT OUTCOME

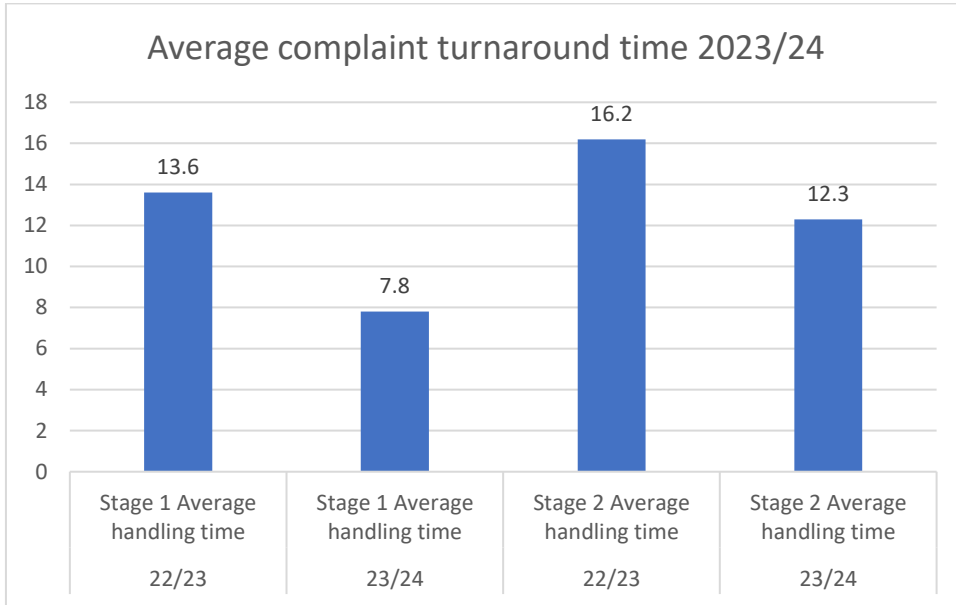
6.1 Delivering high quality complaint responses within our target timescales (see section 2.5) is central to good complaints management and to restoring satisfaction for residents. We have seen an improvement in our complaint turnaround times over 2023/24 on the previous year, as shown below. The complaints team was in place from the start of July 2023:-



6.2 Additionally, within our target times, our average complaint turnaround time (the number of days taken to conclude the complaint) fell between 2022/23 and 2023/24 at both stages of our complaints process, meaning quicker complaint outcomes over and above our target times.

HOUSING SOLUTIONS

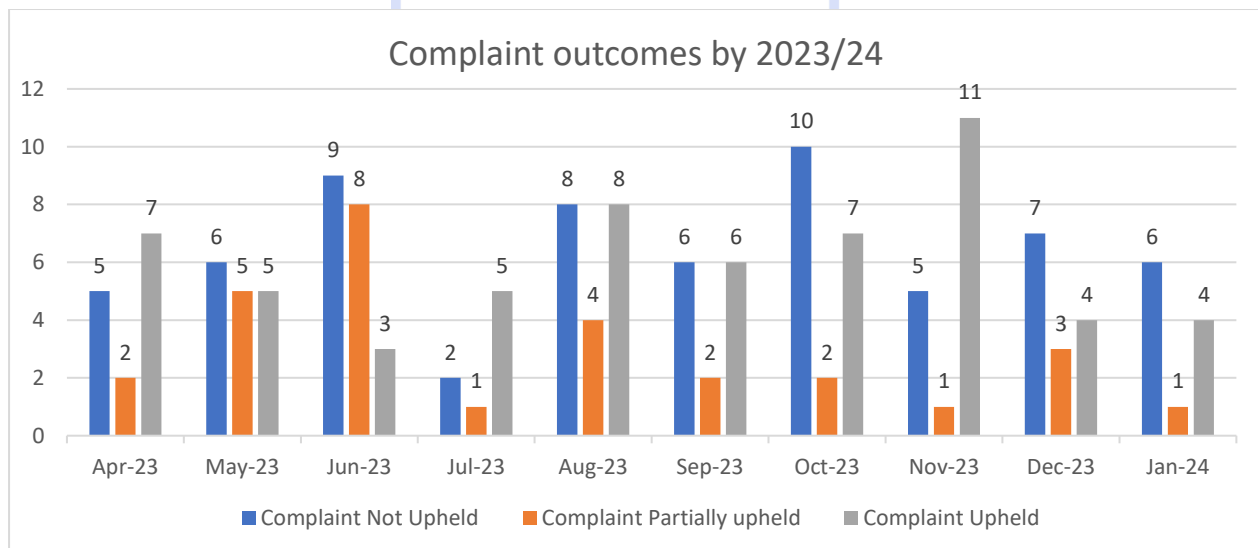
Board Report



7.0. CATEGORY OF COMPLAINT OUTCOMES

7.1 Under the current Housing Ombudsman Code, landlords are able to classify complaints as : ‘upheld’, ‘partially upheld’ or ‘not upheld’. From 1 April 2024 all complaints must either be classified as ‘upheld’ or ‘not upheld’. Where at least one element of a complaint is ‘upheld’, the complaint must, as a whole, be recorded as ‘upheld’.

7.2 The chart below shows complaint outcomes by month for 2023/24 across all three current categories.



HOUSING SOLUTIONS

Board Report

7.3 Whilst the chart broadly shows a mixed picture in complaint outcomes over the year, the spike in ‘upheld’ complaints in November 2023 was the result of issues with our repairs & maintenance contractor [CONTENT REDACTED FOR PUBLICATION] as we prepared to transition away from this contractor in favour of a new contractor.

7.4 The Table below shows complaints recorded by department over 2023/24:-

Year	Asset Management	Housing, Resident & Community Services	Other*
2021/22	91 (61%)	43 (29%)	16 (10%)
2022/23	120 (65%)	51 (28%)	14 (7%)
2023/24 (to date)	94 (64%)	29 (20%)	23 (16%)

*Other : includes Home Ownership, Development, Finance and the Contact Centre

7.5 As can be seen from the Table, the proportion of complaints split across our three core categories remained broadly consistent with the previous two years.

7.6 The complaint outcomes chart at section 7.2 demonstrates that, taking ‘upheld’ and ‘partially upheld’ complaints together, complaints are generally brought justifiably and there is clear learning to be drawn from the complaints we receive.

8.0 COMPLAINT HANDLING SATISFACTION

8.1 At the point of complaint closure, we send a transactional survey to measure residents’ satisfaction with a) our general handling of their complaint and b) the complaint outcome.

8.2 Our survey return rate is on average 7%. We are working to increase this to provide more statistically relevant and reliable data. Historically we have asked residents to complete the survey via a QR code in (hard & soft copy) complaint outcome letters. In quarter 3 2023/24 we introduced a follow-up email reminder to increase the response rate and in recent weeks have commenced follow-up phone calls at 7 days of complaint closure. This is starting to produce better results and represents an opportunity for us also to address any remaining issues or queries for residents upon receiving their complaint response.

8.3 The Table below shows our complaint satisfaction ratings across both survey measures since 2020/21, ‘satisfaction’ measured as being either ‘satisfied’ or ‘very satisfied’ with the complaint handling / outcome:-

Complaints Satisfaction		
	Complaint Handling	Complaint Outcome
2020/21	75%	53%
2021/22	60%	44%
2022/23	66%	42%
2023/24	80%	80%

8.4 The satisfaction ratings for 2023/24 reflect positive feedback around:

HOUSING SOLUTIONS

Board Report

- ✓ Good communication through the complaints process – such as assurance that the complaint was being dealt with quickly and effectively and we had a clear understanding of the issues involved as well as the desired outcome;
- ✓ The right actions being taken and resolutions being offered – such as taking steps to action a delayed or poor quality repair or respond to an outstanding query

8.5 Residents who were dissatisfied with our complaint-handling expressed that they should not have had to make a complaint for the issue to be resolved or, as in a small number of cases, the dissatisfaction (and complaint) was linked to formal disrepair claims.

Tenant Satisfaction Measures (TSM)

8.6 Our TSM results for the first year of survey of 2023/24 were presented at the Board Strategy Day on 7 February 2024. The TSMs are a broad 'perception' survey across all randomly selected residents of how residents perceive their landlord to be performing in 22 areas. The above complaint satisfaction is drawn from the transactional survey we run upon closure of a live complaint. Respondents may therefore answer all 22 questions posed whether they have experienced the service area or not.

8.7 Our TSM complaint handling satisfaction rating was 43% based on 125 responses, compared to our transactional satisfaction rating of 80% reported above. Analysis of the responses matched 12.8% with complainants for whom we had logged a complaint, showing that there is further work needed to ensure we are identifying complaints made to us correctly and that residents are clear when and how they are making a 'formal' complaint as distinct from, for instance, reporting a repairs issue or anti-social behaviour.

9.0 HOUSING OMBUDSMAN ENGAGEMENT

9.1 A complainant may seek advice from the Housing Ombudsman at any stage of the complaints process but can request a review of their complaint by the Ombudsman only at the end of the process. Currently this means that a complaint can only be referred to the Housing Ombudsman for investigation and 'determination' after the resident has taken their complaint through all three stages of our process. This will change from 1 April 2024 under our new policy and process presented elsewhere on the Agenda.

9.2 Complainants can however seek advice or guidance from the Housing Ombudsman at any point in the process. Where this occurs we may receive an 'evidence request' from the Ombudsman or a 'request to action' a complaint i.e. a request/recommendation that we: clarify for the resident the stage reached in our complaints process; accept a complaint at stage 1 or escalate it to stage 2 or 3.

9.3 The Table below shows the type and level of engagement of the complaints team with the Housing Ombudsman over 2023/24 to date.

HOUSING SOLUTIONS

Board Report

Engagement Type	Q1 2023/24	Q2 2023/24	Q3 2023/24	Q4 2023/24
Evidence request	-	11	3	2
Request to action	1	3	3	2
Determination – no action required	-	-	1	-
Determination – service failure / maladministration	-	-	1	-

9.4 All requests from the Housing Ombudsman were responded to within the Ombudsman’s requested timeframe. [CONTENT REDACTED FOR PUBLICATION]. In 2022/23 the number of cases accepted by the Housing Ombudsman for formal investigation increased by 27%. The percentage of maladministration and severe maladministration findings also increased, with the latter up by 323% in 2022/23. As a result there were 90 landlords with a maladministration rate of 50% or above at 31 March 2023. We expect these figures to rise further when the Ombudsman publishes its 2023/24 annual complaints review.

9.5 Of the sixteen evidence requests Housing Solutions received from the Housing Ombudsman over 2023/24, the Ombudsman issued to us one finding of maladministration. This is the first maladministration order the organisation has received from the Housing Ombudsman though we have in the past had findings of service failure. This concerned the case referred to at section 5.2 above. [CONTENT REDACTED FOR PUBLICATION].

11.0. COMPLAINT LEARNING

11.1 Section 7 of the Housing Ombudsman Code refers to continuous learning and improvement, where landlords are encouraged to ‘to use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery’. The Housing Ombudsman is expecting landlords to provide individual, tailored, “creative” solutions to residents’ complaints with processes and approaches adjusted according to individual needs.

11.2 Following analysis of our complaints over 2023/24, some quick wins and key learnings for improvement are:

- Further training for our Contact Centre when logging repairs to ensure correct resourcing as part of our ‘first time fix’ promise
- Referring residents to the policy guidance when dealing with tenancy issues to provide clear expectations
- Carrying out peer / manager quality review of c10% of housing management cases on a monthly basis for evidence of record-keeping & communication
- Ongoing tighter management to record all customer (“CRM”) contacts & ensure responses within our target times
- Mutual exchange training for Housing Officers
- Review of parking management

HOUSING SOLUTIONS

Board Report

- Refresher training on complaints for all staff to identify expressed dissatisfaction, distinguish complaints from business as usual requests and to reinforce the importance of thorough record-keeping
 - Strengthening our case management in community safety including ASB to ensure we are meeting best practice advice from the Housing Ombudsman including noise management
 - Strengthening contractor management, sharing feedback from complaints on recurrent issues supported by clear action & improvement plans
- 11.3 All of the above will be supplemented and supported through in-house feedback forms on conclusion of each complaint capturing identified learning and required improvement steps for colleagues and managers to own and implement.

12.0 **RECOMMENDATION:**

- 12.1 For the Board to receive the annual complaints report for the 2023/2024 year to date, noting the trends, drivers, and outcomes for complaint handling, in addition to compliance with the Housing Ombudsman Code.

13.0 **ISSUES:**

Tenant Implications

Failure to respond to complaints in line with our Complaints Policy and process is likely to negatively impact resident satisfaction.

- 13.1 ***Risk Analysis*** [CONTENT REDACTED FOR PUBLICATION].