

Housing 21

Complaints Performance and Service Improvement Report 2023 – 2024

Note: The following acronyms have been included in this report:

HOS – Housing Ombudsman Service

CHC – Complaints Handling Code

RL – Retirement Living

EC – Extra Care

ROM – Regional Operations Manager

OM – Operations Manager

RECM – Regional Extra Care Manager

ASB – Anti-social Behaviour

TSM – Tenant Satisfaction Measure

SOT – Strategic Operations Team

Housing 21's Board response to the Complaints Performance and Service Improvement Report 2023 – 2024

The Board of Housing 21 welcomed the annual complaints report and the self-assessment against the revised Complaint Handling Code.

In addition to this full report with all data for the year, the Board and Committees receive regular updates on the volume and nature of complaints alongside information on improvements made as a result. The Board actively monitors these elements and make recommendations as appropriate.

Throughout the year, Board members place emphasis and value on visiting schemes and speaking to residents, using identified themes and feedback to inform strategic decisions on how we run the organisation.

The Board did question how robust Housing 21's complaints recording system is. We were pleased to be assured that the system has had a thorough review to ensure it meets all current requirements. We look forward to making further improvements.

The Board also noted that only 47% of residents are satisfied with the response to complaints according to the TSM question asked in 2023, and this is something we need to improve. Continued scrutiny will be put on this throughout the year and an increased emphasis on putting things right at an early stage. The Board will of course monitor this closely and continue to assist wherever we can.

The Board thought it would be valuable to strengthen how we identify and communicate lessons learned from complaints and would like to see more resident involvement in this process. We were pleased to have this feedback taken on board and plans for this include engaging with the insight and learning from both our internal complaints and also the knowledge shared by the Ombudsman, utilising the resources for complaint handlers, Executive Team and Board to ensure Housing 21 is responding to, and learning from, complaints in the most effective way possible.

We as the Board of Housing 21 are proud that our organisation has an open and transparent culture which welcomes all feedback from residents. The Board, Executive and our teams actively seek out residents views, not just through complaints, and we work to address any issues and make service improvements.

Elaine Elkington
Chair of the Board of Housing 21

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Introduction

The Housing Ombudsman's vision is "to improve residents' lives and landlords' services through housing complaints." As part of this vision, the service seeks to uphold the following four values:

- Fairness: We are independent and impartial; we take time to listen carefully and to understand the evidence
- Learning: We share knowledge and insights to maximise our impact and improve services
- Openness: We are accessible and accountable; we publish information on our performance and decisions
- Excellence: We work together to provide an efficient, high-quality service.

Whilst the essence of an effective complaints management process has not changed – ease of access, customer service, thorough investigation and an objective approach to complaints resolution, there is a greater emphasis on:

- Governance and assurance: reflecting the greater role that the Board, through the 'Member Responsible for Complaints' (MRC) and the 'Executive Responsible for Complaints' (ERC) are expected to play in their oversight of an effective complaints service,
- Performance monitoring: to reflect the greater profile given to complaints in the Tenant Satisfaction Measures and expectations around performance management of complaints and in wider terms,
- Learning: around the importance of analysing and learning from good practice, such as that set out in the Housing Ombudsman's Spotlight reports,
- Learning: by analysis of complaints internally to drive continuous improvement not just in complaints management but across all areas of service where there may be complaints.

The 2023 CHC sets out that landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:

- a qualitative and quantitative analysis of the landlord's complaint handling performance - this must also include a summary of the types of complaints the landlord has refused to accept: see section one.
- any findings of non-compliance with the Code by the Ombudsman: see section one
- the service improvements made as a result of the learning from complaints: see Lessons Learnt within section one, Lessons Learnt.
- its actions following any annual report about the landlord's performance from the Ombudsman: see HOS within section one.
- its actions following any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord: see HOS and Lessons Learnt within section one, Lessons Learnt.

A detailed picture of our performance around complaints is included in section one.

To comply with the CHC, a revised Complaints and Compliments Policy has progressed through our internal processes ahead of being circulated to Board for approval.

1. Complaints and Compliments Summary 2023 - 2024

The following section provides details on all formal complaints and compliments which were received during the year 2023/24. It breaks the data down by the subject of the complaint at both stage one and stage two of the complaints process. Our performance against the required response times is presented as is the distribution of complaints by scheme across the country. The cases and inquiries received from the Ombudsman are also presented.

Compliments

During the year 2023/24, we recorded a 16% increase in compliments. In total, 73% of the 1,170 compliments were about a manager, team or employees.

Table 1: Number of compliments received during 2023/24

Year	Extra Care	Retirement Living	Total
2022 - 2023	830	180	1,010
2023 - 2024	956	214	1,170

The following figure 1 shows the categories in which we received compliments.

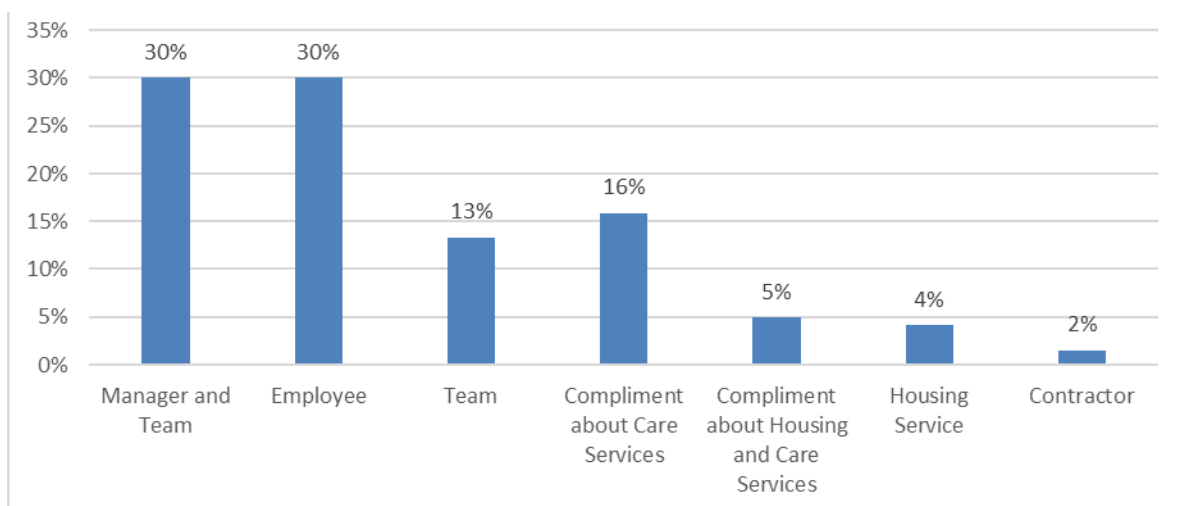


Figure 1: The percentage of compliments by subject area

Compliments received

195 schemes received compliments but no formal complaints and of those 123 reported at least one informal complaint. The schemes below reported more than ten compliments but no formal complaints.

Table 2: Schemes that recorded more than 10 compliments and no formal complaints

Scheme Name	Number of compliments
4210 Webb Ellis Court	108
4138 Clifford's Mews	86
4522 Lady Ida Lodge	36
4132 Dovecote Meadow	34
4130 Bramble Hollow	28
3206 Limestone View	20
4134 Gildacre Fields	19
1307 Poppy Dene	17
4127 Marigold Court	17
3617 Diamond Court	15
4209 Rohan Gardens	15
5902 Lonsdale Court	14
2204 Singleton Court	12
4213 Laurel Gardens	12
3716 Charles Court	11
4322 Deighton Court	11

Informal Complaints

Prior to the release of the CHC 2024, we had an informal complaint process ahead of the formal complaint process to support the ethos of early resolution wherever possible. This represented the point where a complainant, or their representative, brought us an issue or a service failure and we took steps to remedy it immediately. The formal stage was entered into where an issue was more complex, required further investigation or where a complainant wished it to be entered into the formal complaints process.

We received 691 informal complaints in 2023/24, 23% (128) more than in the previous year. The categories of complaint and the respective number are shown in the figure below. After care and repairs and maintenance 'other' is the third most common complaint. ERICA (the reporting system) does not breakdown the 'other' category, instead those reporting will class anything else in this area where they feel the specific categories do not fit the complaint. Examples of the 127 informal complaints highlighted above consist of; issues relating to fairness or respect, external agencies, health and safety, failure to communicate, resident and leaseholder engagement, damage to property, failure to consult, property development, mobility scooters, legal, issues relating to Covid-19 and head office support.

The HOS believe that any informal additional complaint stages complicate the process for the resident and delays access to the formal complaints process and the Ombudsman

service. The ability to record an informal complaint was removed on our incident reporting system, ERICA, at the end of March 2024.

We anticipated an increase in the overall numbers of formal complaints with the removal of the informal stage. However, the HOS (and Housing 21) is clear that higher volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process (S3.3, CHC). They feel that low complaint volumes are potentially a sign that residents may be unable to complain and therefore in breach of the code.

The following figure 2 shows the subject areas in which we received informal complaints.

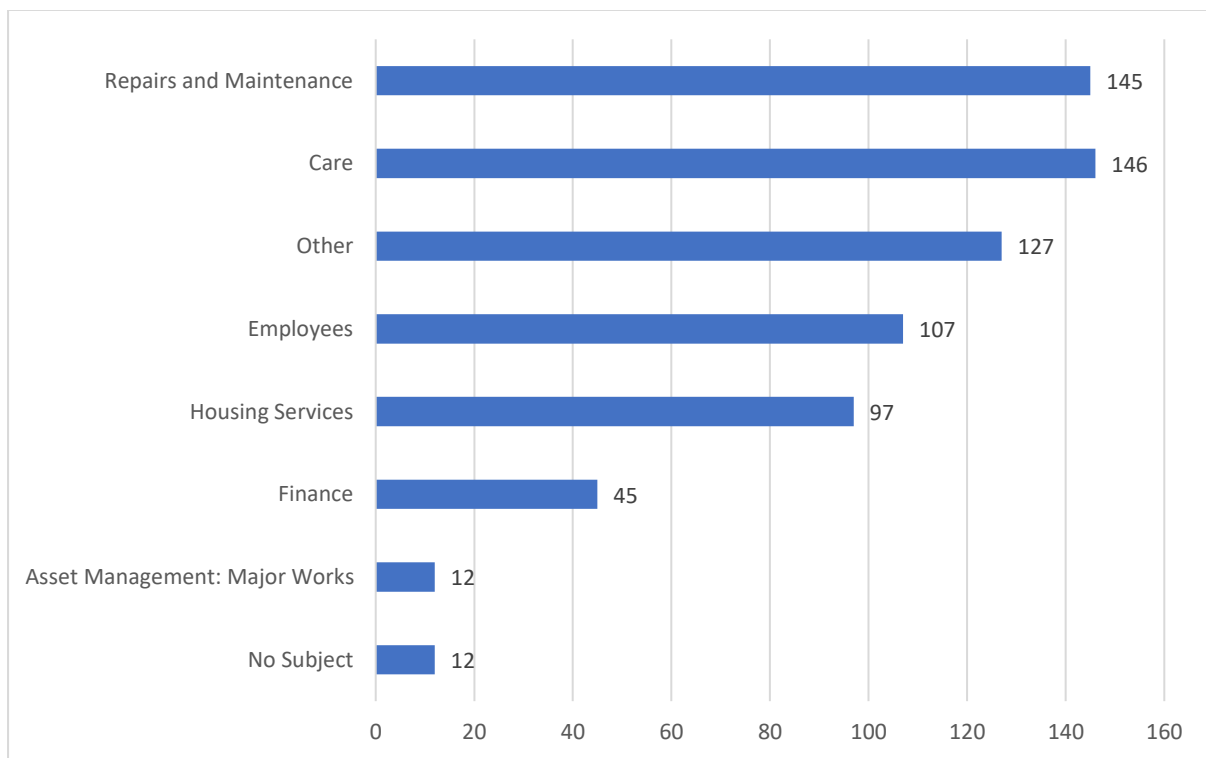


Figure 2: Informal complaints by subject area

There were a number of informal complaints around care, the highest reported subject area, and the number which progress to stage one, is much lower. We will monitor any increase in care related stage one complaints and work to better understand the type of issues there are and how they were previously resolved at the informal stage.

The process of responding to formal complaints at stage one, as opposed to the informal complaints, is more resource intensive requiring acknowledgement, investigation, and a formal response. Consideration around this resource will be given as we continue to monitor performance, and the time needed by those managers responsible for stage one complaint responses, which currently sits with RECM's/OM's and ROM's.

The training and briefings currently being rolled out around complaints and the CHC, addresses what is a service request and what is a complaint to minimise incorrect reporting at stage one. This change in the code and how we classify what is a service request as opposed to a complaint has also been incorporated into the recent Policy review.

Complaints not accepted

The new CHC now requires us to report on those complaints which we have not accepted to progress through our formal policy. Through the changes we are progressing through ERICA, those instances where we have not accepted a complaint will have a field in which they can be recorded so these can be centrally and locally monitored.

In 2023/24 three complaints were not accepted and recorded centrally. The people in all three cases were not residents and had not received services either as an applicant or as a past resident. Now the pause on ERICA developments has lifted as a result of moving away from Civica, this is now being included as an option to be recorded locally.

Stage One Complaints

Overall, the number of complaints received increased from 127 in 2022/23 to 148 in 2023/24. We received 148 stage one complaints, classified into the areas in figure 3 below. 31% of stage one complaints were upheld, 40% partially upheld and 29% not upheld.

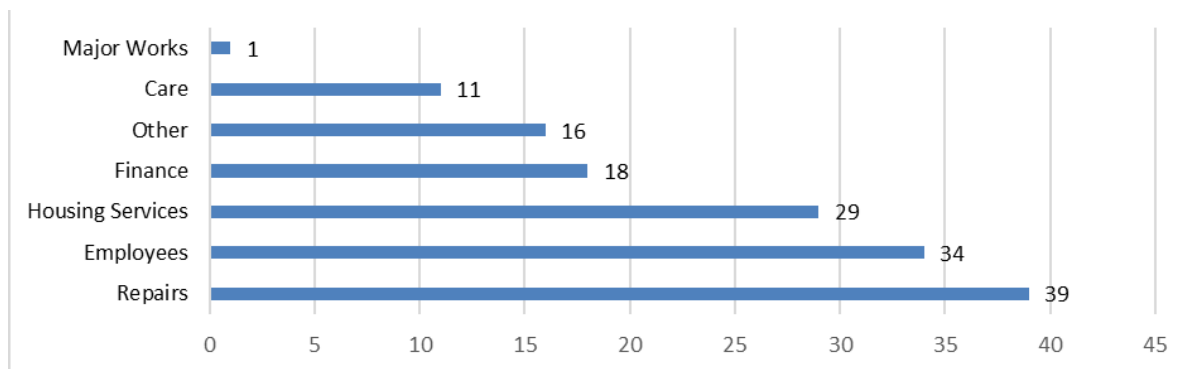


Figure 3: Stage one complaints by subject area

*Please note, complaints listed as other include subject areas of failure of service, issues relating to fairness and/or respect, legal, failure to communicate, damage to property, Health and Safety, mobility scooters, head office support and policy.

The new CHC makes it clear that residents must be able to easily report a complaint and that we must enable this to happen through a variety of ways. Figure 4 below shows the number of complaints received by the way we are contacted. Email continues to be the main method by which we receive stage one complaints, at 69%.

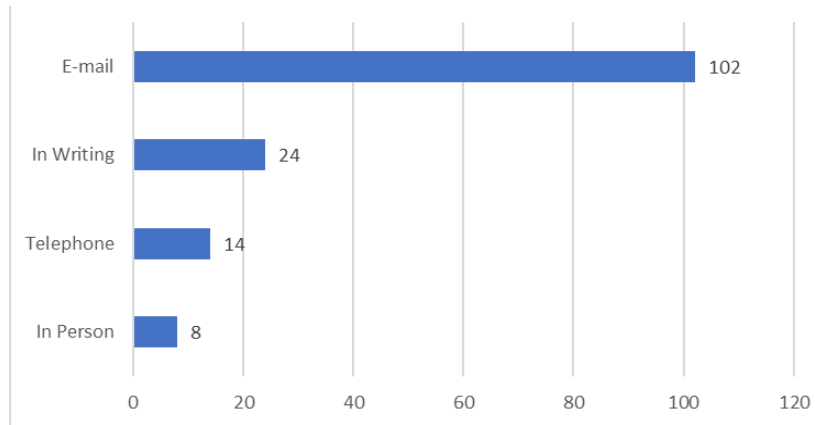


Figure 4: Method of receipt for stage one complaints

As anticipated, we are now seeing a significant increase in the number of stage one complaints this year to date (April – May 2024) against the 2023 – 2024 average monthly amount of 12 and an update on the current position is provided later in this report.

Stage Two Complaints

At the beginning of 2023/24, we saw a significant increase in the escalation of stage one complaints but over the course of the year, this settled into comparable figures to the previous year.

26% (38) of stage one complaints were escalated to stage two, the final stage in our complaints process, in the areas contained in figure 5 below. Of these 15% (22) were upheld, 41% (60) partially upheld. In 2022/23, 28% (36) cases were escalated from stage one to stage two.

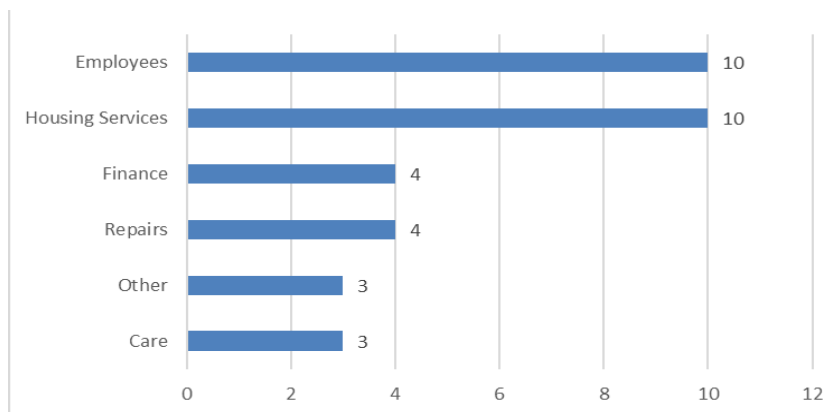


Figure 5: Stage two complaints by subject area

*Please note, complaints listed as other include subject areas of failure of service and failure to communicate.

Despite repairs and maintenance being the highest cause for complaint at stage one, it is the subject area most commonly resolved at stage one with only 11% of the complaints being escalated to stage two being around repairs.

In addition, we also take steps to review any complaints relating to damp and mould, this information is also reported as part of the fortnightly compliance report to IDC. At year end, we had received two stage one damp and mould complaints (not upheld), neither of which progressed to stage two.

Complaint response times

The CHC sets out the timescales by which we must respond to the various stages of the complaint process.

- Acknowledgement of stage one and two formal complaints is within five working days
- Response to stage one formal complaints is within 10 working days
- Response to stage two formal complaints is within 20 working days

Table 3: Responses to stage one and stage two against target timescale

Stage of Complaint	Number on target		Total	% on target
	Yes	No		
Stage one acknowledgement	146	2	148	99%
Stage one response	137	11	148	93%
Stage two response	37	1	38	97%

The reasons for non-compliance in the 100% target for stage one response times included: communication / availability of complainant and volume of historical information to review. The cause for missing the timescale for the stage two is that it was posted one day late due to collating the information required by the CHC. This was more detailed than normal as it was based on a HOS enquiry which required clarification with the complainant.

Stage One Support Process

In November 2023, we commenced a pilot with EC to support stage one complaint handlers as we had identified a skills gap around complaint handling, there had been some responses completed out of time and we were experiencing an increase in stage two escalations. A method of triage was developed, and a support session created which was delivered via Teams. Handlers, and their line managers, received an invite to the session, which were run twice a week once their complaint was logged on ERICA.

The content was designed with the following outcomes in mind:

- Increase in confidence and knowledge for complaint handlers,
- Improved investigations supporting good record keeping and the need to evidence our decisions resulting in a better quality response,
- Increase in resident satisfaction,
- Increase in resident satisfaction with complaint handling,
- Reduction in stage two escalations
- Improved record keeping around complaints,
- Improved recording of Lessons Learnt and sharing of good practice.

The headlines from the pilot were:

- In November 2023 to February 2024, 15 sessions were delivered to EC, lasting approximately an hour each.
- During the pilot there were no complaints completed out of time.
- There were no stage two escalations during the pilot, but there have since been two escalations relating to the pilot period.
- There have been 10 extensions during that time, which hadn't been used before, which is a positive as previously complaints have been responded to out of time.
- One complaint had already been responded to before it was logged on ERICA.
- It was identified there was a need for a lighter touch session for those that had completed the full session previously.
- The use of an anonymised case study to demonstrate the process and a good quality response was welcomed.
- We found the two sessions a week was sufficient with a maximum of three handlers per session.
- The pilot was viewed as successful and has now been rolled out across RL and forms part of our complaints procedure.

A feedback survey was completed at the end of the pilot and will continue on a bi-monthly basis.

Overall, feedback from handlers and line management was very positive as it gave them both reassurance that they were following the correct process and an opportunity to discuss their concerns with SOT and their peers who were also at the same point in the process. The majority felt they had all the information and support needed to handle their complaint and that they felt confident doing so.

Other feedback included that they would like to see more root cause analysis of the complaint in the session, to identify and include relevant members of other central teams where appropriate to attend and that complaint handlers have more capacity to better to respond within the required timescales.

The sessions were extended to RL in April 2024 and so far, 16 sessions have been run. Feedback from RL is along the same lines as EC, in that the sessions have been welcomed, people find them informative, and the triage is helpful. With the increase in stage one complaints, we are holding more sessions a week.

The newly introduced 'check-out' sessions are designed to review the quality of responses, review lessons learnt, ensure ERICA is up to date with the correct information, to provide feedback on handling the complaint and to confirm any redress offered has been processed and required action plans put in place.

Complaints Data Triangulation

There are currently system challenges to undertaking automatic triangulation and we are working to improve how we can best manipulate the limited data that ERICA offers. This will include around residents protected characteristics, language etc.

Complaint distribution

The 148 formal complaints received during the year are distributed over 110 schemes. There are no particular trends in distribution as these range between one and four complaints per scheme. On a patch level, EC Central 1 has the greatest number of complaints per 100 properties for Extra Care and Hampshire South and Isle of Wight has the most for Retirement Living.

This means that 553 schemes have not reported any formal complaints. Two patches in EC and six in RL reported no formal complaints which will be targeted along with the other outliers identified within this data to form an action plan with specific resident and employee communication and training based around perceived barriers, such as alternative formats or languages, once it has been established what is required.

When informal complaints are taken in account 289 schemes have reported a complaint and only Kent 2 did not report any complaints at all. This area will be targeted in the action plan above.

Across both business streams, 31% (44) of formal complaints required extensions. In both business streams, the number of complaints requiring extensions were evenly distributed across the regions. There were a few outliers such as EC Central and London which were above average at 14%.

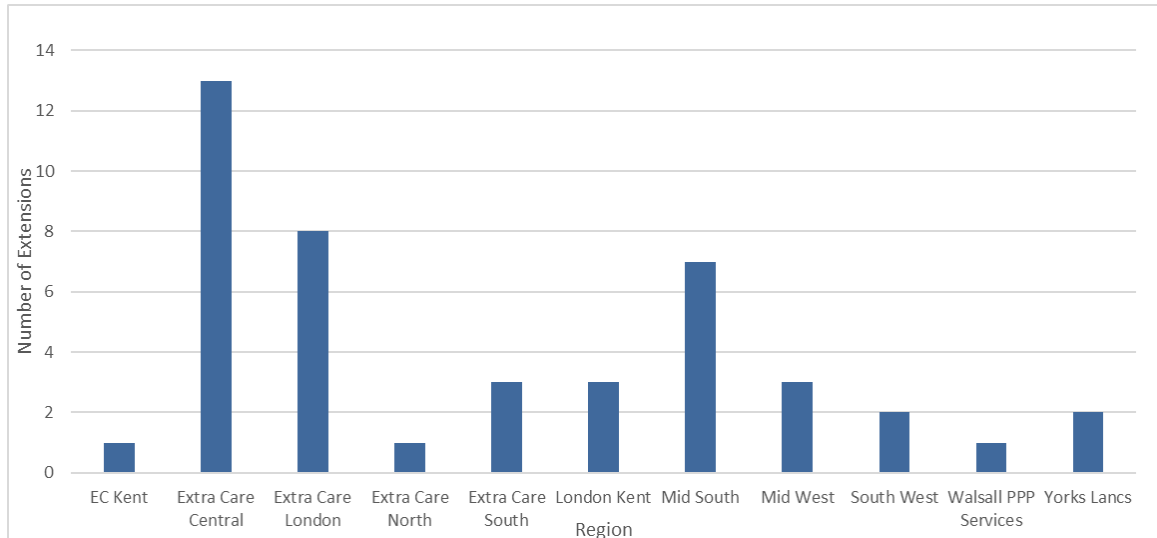


Figure 6: Number of extensions by region

The following table shows those patches which have not received any formal complaints, again these will be looked into to ensure there are no barriers to complaints.

Table 4: Patches with no formal complaints

Extra Care	Retirement Living
Kent 2	Cambridgeshire and Bedfordshire
Kent 3	Durham Cleveland and Cumbria
	Kent North
	Merseyside
	Tyne and Wear and Northumberland
	West Mids Hereford and Worcs

The following table shows the distribution of complaints by formal and informal complaints by subject area.

Table 5: Distribution of complaints by subject area across formal and informal complaints

Subject	Formal Complaint Stage One	Formal Complaint Stage Two	Informal Complaint	Grand Total
Asset Management: Major Works	0.88%	0.00%	1.72%	1.54%
Care	7.02%	8.82%	21.70%	19.19%
Employees	21.05%	29.41%	15.37%	16.71%
Finance	12.28%	11.76%	6.47%	7.46%
Housing Services	16.67%	29.41%	13.94%	14.93%
Low Level Nuisance	0.00%	0.00%	0.14%	0.12%
No Subject	0.00%	0.00%	1.72%	1.42%
Other	11.40%	8.82%	18.25%	16.94%
Repairs and Maintenance	30.70%	11.76%	20.69%	21.68%
Grand Total	100.00%	100.00%	100.00%	100.00%

Table 6 shows formal complaints within the areas of repairs, housing services and employees.

Table 6: Sub subjects within Repairs, Housing Services and Employees

Sub Subject	Number of formal complaints
Attitude or behaviour of court or care manager	13
How ASB&N reports handled / procedure followed	10
Other	10
Attitude or behaviour of employee(s)	8
Heating and/or Hot Water failures	6
Performance of court or care manager	6
Ongoing repair issue	6
Cancellation or delay to works	5
Issues relating to other tenants/residents	4
Promptness of repairs	3
Building Condition	3
Performance of employee(s)	3
Availability of court or care manager	2
Damp and mould issues	2
Attitude or behaviour of manager	2
Site organisation / management	2
Cleanliness/safety in communal areas	2
Access to communal areas	2
Request to move flat	1
Security of court	1
Request for compensation due to damage	1
Door Entry failures	1
Maintenance of communal areas	1
Pets	1
Support call monitoring service	1
Communication on progress	1
Other agency	1
Marketing and letting	1
Catering services	1
Lift failures	1
Issues relating to visitors	1
Grand Total	102

Complaint escalation from informal complaint stage

Of the 627 complaints that were reported as informal complaints, 97% (609) were resolved at the informal stage.

Of the 114 formal stage one complaints 12% (14) were complaints escalated from an informal complaint. 12% (4) of the formal stage two complaints were initially logged as informal complaints.

Complaints in Extra Care

Table 6 below shows all the complaints by patch for EC. Extra Care Central has the most formal complaints and Extra Care North has the most informal complaints.

We record the complaints per 1000 units as part of our overall TSM recording which was 2.7 at year end 2023/24 and 0.27 by 100 to offer a benchmark against the patches below.

Table 6: Number of complaints by patch

Patch Name	Number of Formal Complaints	Number of properties	Number of complaints per 100 properties
EC Central 1	10	424	2.36
EC Central 2	6	641	0.94
EC Central 3	5	456	1.10
EC Central 4	10	558	1.79
EC Central 5	5	262	1.91
EC North 1	2	400	0.50
EC North 2	1	641	0.16
EC North 4	1	487	0.21
EC North 5	2	480	0.42
EC South 1	1	332	0.30
EC South 2	3	406	0.74
EC South 3	2	501	0.40
EC South 4	6	405	1.48
Kent 1	3	158	1.90
London 1	8	374	2.14
London 2	4	294	1.36
London 3	3	366	0.82
London 4	4	236	1.69
Walsall PPP Services	1	325	0.31
Grand Total	77	7746	20.51

Figure 7 below shows the regional split by subject. For EC, repairs and maintenance tends to be the most common complaint with the exception of the EC Central and Kent where it is Housing Services.

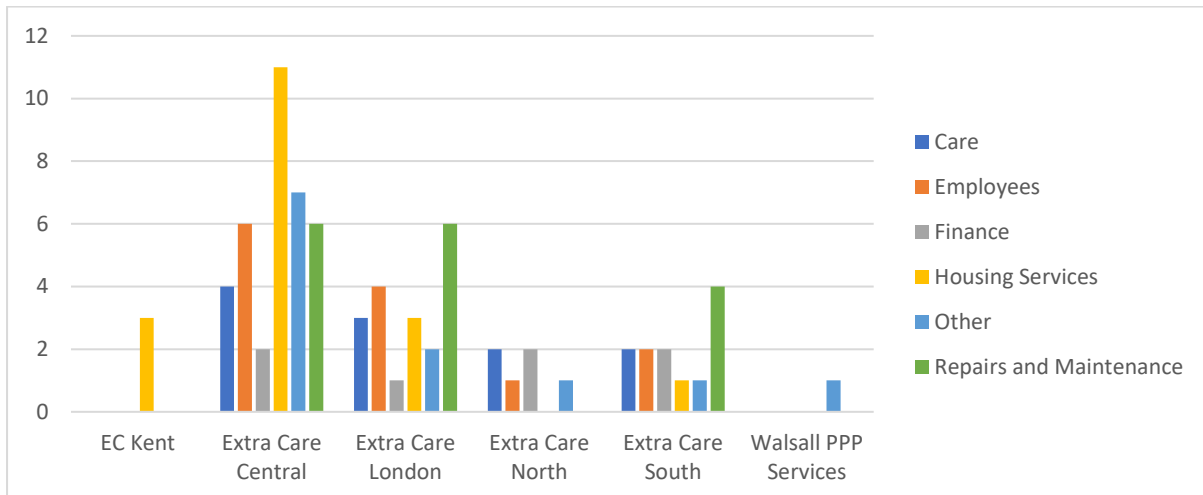


Figure 7: Extra care regional split by subject

Complaints in Retirement Living

The table below shows all the complaints by patch for RL, Hampshire South and Isle of Wight, which has the most formal complaints. Mid-South has the most formal and informal complaints as displayed in table 7.

We record the complaints per 1,000 units as part of our overall TSM recording which was 2.7 at year end 2023/24 and 0.27 by 100 to offer a benchmark against the patches below.

Table 7: Retirement Living complaints by patch

Patch Name	Number of Formal Complaints	Number of Properties	Number of complaints per 100 properties
Berks and Hampshire North	4	442	0.90
Cheshire and Lancashire	2	460	0.43
Derbyshire and Nottinghamshire	2	523	0.38
Devon Cornwall and Southwest Somerset	1	386	0.26
Dorset	3	311	0.96
East and West Sussex	7	473	1.48
Essex and Hertfordshire	2	511	0.39
Glos Oxford and South Bucks	4	470	0.85
Greater Manchester	3	674	0.45
Hampshire South and IOW	12	574	2.09
Kent South Coast	2	424	0.47
Lancashire	1	539	0.19
Lincolnshire and Leicestershire	1	439	0.23
Norfolk	2	419	0.48
North and East London	3	390	0.77
North and East Yorkshire and NE Lincs	3	321	0.93
Northeast Somerset Wilts and Avon	3	336	0.89

South London and Surrey	4	476	0.84
South Yorkshire and South Manchester	2	273	0.73
Staffordshire	3	473	0.63
Suffolk	1	334	0.30
Warwickshire and Northamptonshire	1	436	0.23
West Yorkshire	3	533	0.56

The figure below shows the regional split by subject. For RL repairs and maintenance tends to be the most common complaint with the exception of the mid-south where it is employees.

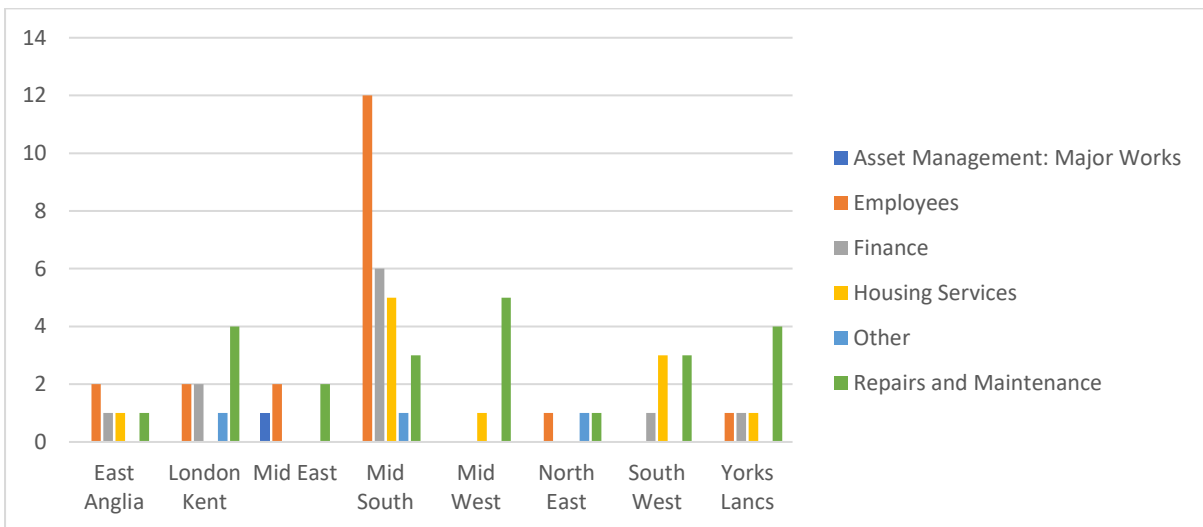


Figure 88: Retirement Living complaints ROM area split by subject

Compensation

Compensation is an important part of redress and therefore key in supporting early resolution where additional time, effort and expense have been experienced by a complainant. We are continuing to promote remedies most appropriate to the individual, as this doesn't always take a monetary form.

Our records show that compensation was awarded at stage one in 45% (67) of cases and stage two in 25% (7) of cases. This represents a 15% (30) increase from 2022/23. The ERICA system did not allow for compensation to be recorded for Informal Complaints.

Through the data triangulation exercise in the final quarter, we can identify that 55% (81) complainants received compensation totalling in £14,862.

31% of stage one complaints were upheld, 40% partially upheld and 29% not upheld. 15% of stage two were upheld, 41% partially upheld and 44% not upheld.

Table 8: Total and average compensation amounts by complaint subject area

Subject	Number of complaints offered compensation	Percentage of total annual complaints	Sum of total offer	Average £ per complaint offered compensation
Repairs and Maintenance	24	16%	£3,764	£156.83
Employees	20	14%	£2,950	£147.50
Housing Services	13	9%	£3,918	£301.38
Finance	10	7%	£2,720	£272.00
Other	9	6%	£826	£91.78
Care	5	3%	£685	£137.00
	81	55%	£14,862	£183.48

Housing Ombudsman

Background

The HOS continue to train and develop a considerable number of new employees and have started to address their significant backlog which was created by an unparalleled increase in cases:

- A 91% increase in cases coming to us in the first 9 months of 2023/24 (compared to the same period 2022/23),
- A maladministration rate of 72% (it was 59% in 2022/23) by Q3,
- Compensation of £3.7m (compared to £1.1m for the whole of 2022-23) by Q3,
- More than 14,000 remedies following our investigations (compared to 6,500 in the prior year) by Q3,
- Overall, HOS feel that 2024-25 is likely to be a difficult year for social landlords and, as a result, they expect demand to continue to increase by between 50% and 80% compared to 2023-24.

It is anticipated that their new annual charge per unit will increase significantly from £6.75 per unit in 2023/24 to £8.03 per unit in 2024/25, but the confirmed amount is yet to be released.

[HOS performance report for Housing 21 2022/23](#)

We are required to share the most recent performance report for Housing 21 from the HOS and any associated actions. We are yet to receive the 2023/24 report. The 2022/23 performance report was received in October 2022 and recognised Housing 21 as one of only five landlords with zero at fault determinations, the same in 2021/22. There were no actions associated with the report other than the obvious sharing and positive response.

Unfortunately, by the point in 2023/24 that we were in receipt of the report, we had already had findings of maladministration as set out in the summary of our determinations, which is contained in Appendix one.

We have not received any findings of non-compliance with the CHC by the HOS.

Determinations

Last year we saw a considerable increase in enquiries (as opposed to cases) from the HOS. An enquiry is where a complainant has referred their case to the HOS but they can see that their complaint has not been through any or all of our complaint stages. We would then be asked to respond at stage one or stage two appropriate. An enquiry can lead to a case.

Case requests can take many months for the Housing Ombudsman to process and so determinations can often relate to a previous financial year. Our target is zero at fault cases. In 2023 / 24

- A total of 13 enquiries were received:
 - two EC and 11 RL

- A total of eight cases
 - five RL and three EC

The HOS can determine cases brought to them as having no failures or resolved by redress if within their jurisdiction, or depending on the severity of the case, they will make determinations of Severe / Maladministration or Service Failure. They can also issue a Complaint Handling Failure Order, previously this was following three warnings, however this has been reduced to two or no warning. Their determinations are published three months after the final review date.

Five determinations were received during 2023/24 (plus two cases which were withdrawn).

Regretfully, three of the determinations had aspects which were found to be at fault.

- Two of these were found at fault for service failure
 - one EC which was handling of anti-social behaviour and complaint handling
 - one RL which was anti-social behaviour handling, in particular the issue of an ASB warning letter and associated complaint handling.

- One Retirement Living case was found as Maladministration for failures in investigating a resident's concerns, complaint handling and record keeping. We received no complaint handling failure orders.

The actions and recommendations included:

- Training for employees in relevant procedures which has been carried out, alongside our antisocial behaviour policy review where it was identified that further ASB training was required and will be carried out this year.

- To consider the implementation of a separate resident unreasonable behaviour policy. This is currently being developed alongside our antisocial behaviour policy review. Residents are being involved through our resident engagement groups.

Two further cases were submitted in 2023/24 which are yet to be determined, one of these having recently been assigned an adjudicator for review at the end of May 2024. One has been determined in April 24 with a finding of no service failure and resolved by redress.

Appendix two contains a table with all the Ombudsman determinations received during 2023/24.

Lessons Learnt

Sources of lessons learnt

All complaint handlers should include any lessons learnt when recording the incident in ERICA, this also includes the actions taken as a result of the complaint. However, as highlighted within the recent Campbell Tickell audit, this is an area which needs to be strengthened. Complaint handlers are not systematically including lessons learnt within their recording of a complaint which limits the information which we have centrally to identify and act on those lessons which should be adopted at a level above an individual scheme. Nor can we start to identify trends across the country and organisation if we are not receiving that information.

The Lessons Learnt Group

The centrally managed 'lessons learnt' group consists of employees (Heads/RECMs/ROMs) who have recently investigated a stage two complaint. They discuss how the case was handled, how the response could potentially have been better and how lessons will be disseminated. This group is also joined by employees who represent teams across the organisation. This is to ensure that the lessons learnt are heard more widely and consideration is given to how they may be used to improve our services more widely than just focusing on the operational streams.

As part of the current review of ERICA and how best it can support complaint handling data, we are exploring what functionality can be included to better identify lessons learnt specific to particular business areas, for example where it is a national contractor or an area for learning and development which is becoming a theme so these can be reported back.

Lessons learnt can be captured from a number of sources, all of which need to be considered to ensure we are maximising the opportunity to improve services for residents.

The sources include:

- Complaints themselves
- The complaints survey which is used to gain feedback from all complainants
- Housing Ombudsman determinations

- The Resident Complaints Panel
- The Housing Ombudsman Insight reports (published every three months)

Lessons learnt in 2023/24

A lessons learnt log is maintained centrally and actions relating specifically to individual complaints as well as wider lessons learnt are documented in this. This is circulated to RL and EC on a monthly basis.

National lessons learnt:

- New Unreasonable Behaviour Policy: currently in consultation, due June 2024 as a result of a HOS determination,
- New Pest Control Policy: to commence following Unreasonable Behaviour Policy,
- More training on ASB required nationally following the current policy review and HOS determinations: due September 2024,
- Review of record keeping now we have moved away from Civica and a CRM: this is being led by the EC project team,
- Policy to be updated when entering properties and conduct within it: RL leading on this in next review,
- Safeguarding Policy to include referral to the Office of the Public Guardian alongside the Social Services Department if someone with a Power of Attorney is involved: RL case which the Safeguarding Lead is leading on at the next annual review,
- We have seen the introduction of alternative contact methods for prospective purchasers of new development properties e.g. Microsoft Teams or WhatsApp,
- A new 'Damp and Mould Policy' as a result of the HOS Spotlight Report is in place,
- The Regulator has told providers that there will be a new focus on pest infestations which we have responded to by ensuring this has been included within the subject areas for complaints so we can better monitor.

Scheme Specific Lessons Learnt:

- The importance of communication and reporting to both residents and their family, if applicable.
- Learning and development in the following areas:
 - ASB,
 - Training on professionalism, boundaries and behaviours undertaken in scheme,
 - Importance of record keeping,
 - Team learning regarding raising internal safeguarding reports,
 - Employee learning regarding complaint policy,
 - Employee learning following concerns about explanation of finance issues,
 - Employee learning on the miscommunication of domestic service charges for the scheme and how it is calculated on the service charge,
 - Training for local team to ensure any issues relating to rent arrears are dealt with promptly, and ensuring frequent rent statements are produced and shared,

- Ensuring communications such as consultation on service charges are sent to the nominated advocate,
- Employee learning on importance of letters being clear and relating to the issue and being clear about any allegations,
- Local team retrained in leasehold resales information and guidance to improve customer experience,
- Training on the handling of personal data
- An action plan was developed to improve resident satisfaction at the scheme
- Repairs and maintenance in the following areas:
 - Follow up on completion of repair works were undertaken with an investigation into the issues,
 - Ensuring all outstanding repairs are actioned,
 - Review with technical team to resolve ongoing heating issues,
 - Meeting with residents and technical managers to develop a longer term solution for on-going heating issues,
 - Improved contractor arrangements when responding to faults with boilers,
 - Change of contractor to deal with automatic doors following poor service level,
 - Improved signage and adjustments relating to the installation of a new automatic door,
 - Adjustment to automatic doors timers,
 - Additional checks to be carried out until the installation of the new digital call system,
 - Implementing an annual tree survey and maintenance schedule in consultation with residents,
 - Putting a new pest control contract in place.
- Catering
 - Reviewing the contract for catering provision on quality standards and food choices.
- Care
 - Review of care plan and associated training on delivery of person-centred care delivery, time keeping and completion of documentation.
- Scheme safety
 - More robust checks on checking visitors to the scheme

Reporting and embedding lessons learnt

Capturing lessons learnt is the first stage of the process which then needs to be followed by reporting and embedding these. Currently, a dashboard of lessons learnt is being created, this will mirror the approach which is used for reporting lessons learnt in safeguarding.

In line with the embedding of the new Complaints Handling Code, a review of how lessons learnt are cascaded through the organisation is being undertaken to maximise the effectiveness.

Analysis will be undertaken on a systematic basis to:

- Report on data – quantitative and qualitative,
 - This will include schemes which have not reported any complaints,
- Identify trends,
- Highlight relevant areas from the Ombudsman Insight reports and take the appropriate action,
- Identify any changes needed to the complaints process and / or reporting.

A report based on this analysis will be provided to the Managing Director of Retirement Living, as the Executive Responsible for complaints (ERC) as well as the lead for the revised Consumer Standards and to the Chairs of the Retirement Living and Extra Care Committees (currently interim Chair of the Board) as ‘Member Responsible for Complaints’ (MRC).

[Resident Engagement – Resident Complaint Panel](#)

The resident complaints panel consists of five residents (one from EC and four from RL). They meet on a quarterly basis to review lessons learnt as well as co-producing the CHC self-assessment, consulting on the reviewed complaints policy and reviewing materials and communications relating to complaints.

Their input was particularly valuable around suggestions to improvements to the complaint process around impartiality and a different complaint handler who sits outside the scheme line management, the appropriate acceptable escalation period from stage one to stage two which the CHC is silent on. Previously, as a result of this work with residents, the complaints policy was specifically updated around the definition of a complaint where we currently use the HOS definition, but the panel wished for it to be more resident focussed and agreed on the alternative wording.

They influenced the procedure around the second stage of our complaints process, where they felt it would be positive to touch base with residents part way through the lengthy 20 working day response time, which is something the Strategic Operations Team now do. This also supports managing resident expectations.

The panel also review the resident complaint handling satisfaction data, the quarterly complaints performance, feedback on resident information about complaints such as the newsletter articles and complaints leaflet. They review all stage two complaints against a matrix which includes areas such as lessons learnt, quality of investigation and quality of response. This is fed into our operational internal lessons learnt complaints group.

The HOS has recently developed a Resident Panel to gain feedback of residents own experiences of complaining to their landlord as well as accessing their services. One resident on our resident complaints panel was successful in their application to join the HOS resident panel.

We are aware that we need to widen the membership of the group to include residents from a more diverse background across both business streams but with a particular focus on EC. This work will be included as part of the follow up work to the new data triangulation and consultation with the resident EDI groups to assess the impact of our policy on our resident's ability to make complaints by Q3 2024/25.

Groups:

- Retirement Living Residents Forum,
- Extra Care Residents Forum,
- LGBT+ forum,
- Disability forum,
- REACH forum (Race, Equity and Cultural Heritage),
- Resident Ambassador Group.

Resident Satisfaction

Monthly

How we handle a complaint is a fundamental part of our service to ensure positive relationships, and service improvement. The ability of residents to feel comfortable making a complaint is as crucial as the resolution process itself. It is for this reason that we undertake a monthly satisfaction survey of residents (or their advocates) who have made a complaint and had their complaint responded to.

For 2023/24, the target was set at 95% satisfaction with complaint handling, in line with our other satisfaction measures. At the time of writing data complaints satisfaction data was available for the first three quarters of 2023/24.

The complaints satisfaction survey is an opportunity for Housing 21 to capture data about:

- Overall satisfaction with Housing 21's approach to handling complaints
- Satisfaction with the following (%):
 - Time taken to receive a response (67%)
 - The outcome of a complaint (33%)
 - That the process was neutral (44%):
- Suggested improvements to the complaints process

Residents' overall satisfaction score with Housing 21's approach to handling complaints increased to 44% in quarter three, up from 36% in quarter one.

There was 33% satisfaction with the outcome of the complaint. A lower satisfaction level for this indicator is expected given the nature of the question – generally only those whose complaints are upheld will be satisfied.

A final measure of satisfaction was whether residents felt the complaints process was neutral. It is important that complaints are handled without bias, and residents feel able to make complaints that will be taken seriously. The satisfaction score for the complaints process being neutral is 44%.

Residents were asked to make suggestions for improvement, to explain their low levels of satisfaction. The most common themes from these comments suggest that Housing 21 should handle complaints with more impartiality to ensure that the process is neutral and unbiased. Furthermore, residents would appreciate their complaints to be handled in a timelier manner with a clearer process.

Table 9: Themes from monthly resident satisfaction surveys and our response

Themes	Our response
More impartiality	Both the complaints panel and the survey have asked whether a different manager could investigate and respond. We are currently investigating whether this alternative approach should be taken.
Complaints handled/ replied to more quickly	More communication has been introduced during stage two investigations (20 working day time period) to ensure residents are assured that their complaint is progressing.
Improved relationship/ communication	We are emphasising the part of our process to make a call to the resident before investigating a stage one complaint through the stage one drop-in's. The SOT team call the complainant before a stage two is investigated. The complainant is contacted midway through a stage two investigation to keep them informed.
Process should be easier/ more awareness on how to make a complaint	The process and supporting complaints documentation will be taken to the resident panels to gather feedback.
Process should be more visible	More resident feedback will be gained on this and relevant action taken through consultation with our resident engagement groups.
Follow-up process	The Research Team now include closing the complaint within their follow up survey.
More discrete / confidential way to make a complaint	We are currently investigating what this may look like, crucially gaining feedback from residents.

Annual TSM Survey 2023 - Complaints

In accordance with the CHC, a statement is provided at the start of the survey advising how residents can make a complaint if they wish to, as should they make a complaint within their response, this may not be identified.

Results

The questions for all TSM's are determined by the Regulator, the responses to the latest survey are shown below.

Have you made a complaint to Housing 21 in the last 12 months?

Yes

- RL: 18%
- EC: 19%
- Rented: 18%
- Shared Owners: 25%

How satisfied or dissatisfied are you with Housing 21's approach to complaints handling?

	Housing 21 Total	RL Total	EC Total	Rented Total	Shared Owners Total
Complaints handling	47%	45%	50%	49%	33%

Table 10: Breakdown of complaint handling satisfaction results

Residents were asked what changes Housing 21 could implement to improve its services. Of all comments around suggested improvements, 5.4% discussed 'customer services and contact'.

Within the theme 'customer services and contact' 66 residents made comments about complaints handling, with a further four discussing unresolved complaints. These comments also included handling of anti-social behaviour, a separate process to complaints.

Many of the other sub-themes identified may also be relevant when considering improvements to complaints handling, such as care, empathy, support, understanding residents' circumstances, resolving problems, believing and trusting residents, etc.

System Updates

In order to comply with the requirements of the new code, and to make other improvements which were paused whilst Civica was being implemented, IT have put resource in place to make the necessary changes now, and a plan for the less critical improvements in the future.

In scope for this round of improvements:

Table 11: Current ERICA updates

Requirements	Summary of Changes
Complaints not accepted	Introduce a new 'Subject' and associated 'Sub-Subjects' to record and monitor complaints which weren't accepted within the 'contact' area.
Service Request	Create a new classification type which would work similarly to previous informal complaint but for Service Request. If the answer is no to the first time it's been requested, they will be prompted to escalate to their line manager for review.
Triage Section including reasonable adjustments and vulnerabilities	Add an additional section called 'Triage' with the following questions: Add an additional question to record and monitor any reasonable adjustments that need to be considered (e.g., video call, large print etc.) and any further commentary (using a text box) Add an additional 'Yes / No' question to record and monitor any vulnerabilities and any further commentary (using a text box).
Include repairs contractor	If the subject is 'Repairs and Maintenance' there will be the option to record the contractor which can be shared for better overall monitoring of national and day to day contracts.
Resolve inaccurate scheme codes	This has now been resolved but meant there could be no triangulation of data until that point.

Campbell Tickell Audit

An audit took place in March 2024 to assess our readiness for adherence to the CHC. Overall, the results were positive, the greatest concern being our use of an informal complaint stage, which was removed at the end of March 2024. They noted a very positive experience when 'mystery shopping' and testing the responses to the complaints telephone line and email supported by the SOT.

The learning recommendations are listed below, all of which have an action plan and timeline associated with them:

- A review of complaints handling resourcing to deal with a likely large increase in formal complaints, given the volume of informal vs formal complaints at the time of our review
- Support for staff so that the very good focus on early resolution is not lost within the formal complaints process.
- We would suggest consideration be given to a programme of more active training in addition to induction, e-learning and coaching through 121s. This could be linked to the concerns raised around complaints escalation, as well as understanding and logging complaints.
- The drop in sessions piloted to support complaints handling within Extra Care schemes should be rolled out across the organisation and communicated clearly and consistently to all staff involved in complaints handling.

- Training and procedures should explicitly address where a complaint is about a policy or strategic decision, rather than the implementation of such.
- The self-assessment with the HOS Code must comprehensively cover all areas of the Code and provide evidence that the policy is being adhered to (for example using the TSM management measures). This will support the Board in having assurance of compliance.
- Better consistency of recording and responding to complaints is needed. This may be partially addressed by training, but regular spot checks should be carried out and a consistent expectation applied.

Reporting

Whilst improving our data and reporting remains a key focus and is subject to an external consultation, we continue to provide the following information around complaints:

- Tier one KPI reporting – TSM
- Tier two KPI reporting - TSM
- Bi-monthly report to Committee and Board.
- Quarterly updates to the Business Leadership Group to increase awareness of complaints across the business and the importance of any employee in contact with residents or their advocates must be able to advise or offer the choice to make a complaint.
- Continuing monthly complaints operations report: will continue to explore how ERICA data could be used in Power BI to develop regional/patch operations reporting.

For 2024/25

- New complaints dashboard for use operationally and strategically.
- Bi-monthly updates on complaints organisationally to the Business Leader Team group
- Bi-monthly detailed performance report to Board and Executive Committees
- Complaints as a standing item at EC and RL Leadership meetings

Training and development

- New Housing Academy sessions already in place,
- Review of complaints training in progress with Learning and Organisational Development,
- Use of the new triangulated data to inform targeted complaints campaign and training,
- Mystery shopping around raising a complaint to ensure learning is embedded and meets the requirements of the CHC,
- Continuing Keeping Connected Sessions around complaints for across the business,

- Continuing presence at key regional and team events to provide training and updates.
- Wider communication plan around the Social Housing (Regulation) Act and Complaints to support signposting to training, materials and to further raise awareness.

Appendix One: Landlord report from the Housing Ombudsman Service

Please see separate report on the website alongside this report.

Appendix Two: HOS Determinations 2023/24

Ombudsman determinations received during 2023/24

Month Determination Received	Outcome type	Main service area/s	Additional compensation awarded?	At fault?
April 2023	No maladministration	Housing 21's response to the resident's concerns over the handling of a welfare incident.	None	No
May 2023	Case Withdrawn	Related to a resident that had passed away. NOK did not wish to pursue on their behalf.	N/A	No
August 2023	Maladministration	<ul style="list-style-type: none"> a. The conduct of an employee. b. Response to the resident's concerns about the conduct of another resident. c. Handling of a rent refund. d. The decision to contact the resident's sister. 	<p>Yes, £800 compensation, comprising:</p> <ul style="list-style-type: none"> a. £250 for the distress and inconvenience caused by the failings in investigating the resident's concerns about the conduct of an employee. b. £300 for the distress and inconvenience caused by failing to investigate the resident's concerns about the conduct of other residents. c. £250 for the time and trouble and distress and inconvenience caused by in its handling of the complaint. 	Yes
September 2023 (determination received)	Service Failure	a. The handling of allegations of ASB made against the resident.	Yes £50 for not investigating his complaint about the gardener and failings in addition to the	Yes

		b. Complaint handling	£100 previously offered in June 2021 and £50 previously offered in March 2022.	
November 2023	Service Failure	Decision to issue the resident with an ASB warning letter.	Yes £280 which was broken down into: £200 for the distress caused by the wrongful issuing of the ASB warning letter and £150 for the failures in complaint handling. The £70 already offered could be deducted from this amount.	Yes
November 2023	Offer of Redress	Request to have a refund of communal surplus water charges paid individually rather than communally.	No, remained at £200 as offered at stage two.	No
February 2024	Case Withdrawn	Resident withdrew the complaint.	N/A	No

Appendix Three: Tenant Satisfaction Measures Complaints Performance Report

As submitted to the Regulator of Social Housing, June 2024

Tenant Satisfaction Measure	Low Cost Shared Ownership	Low Cost Rented
Stage one per thousand	15.1	5.9
Stage one on time	95.5%	92.7%
Stage one on time with extension	9	26
Stage one on time without extension	12	76
Stage two per thousand	4.8	1.4
Stage two on time	100%	96.2%
Stage two on time with extension	2	18
Stage two on time without extension	5	7