

Meeting of:	Board
Date:	20 June 2024
Agenda item:	12



Report of:	Director of Customer Experience and Insight
Title:	2023/24 Complaints Performance and Service Improvement Report
Report focus:	Strategy and Governance
Report for:	Assurance and Decision

Contributions to Plan A 2022/25

Strategy	Objectives						
Transforming Customer Experience and Digital Services	1	2	3	4	5		
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Planet A	6	7	8	9	10	11	12
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supporting Sustainable Places	13	14	15	16			
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Supporting Sustainable Tenancies	17	18	19				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Providing Sustainable Quality Homes	20	21	22				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Building and Acquiring Sustainable Homes	23	24	25				
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Purpose

1. This report provides Board with the annual self-assessment of compliance with the Housing Ombudsman's Complaints Handling Code (the Code) and an annual update on complaints performance and service improvements (PSI) based on complaints received between 1 April 2023 and 31 March 2024. It also updates Board on the service improvement plan actions outlined in the Annual Customer Feedback Report 2022/23 and interim self-assessment against the Code (March 2024).

Introduction

2. The Regulator of Social Housing (RSH) published its new regulatory framework on 29 February 2024 for implementation from 1 April 2024. Within the suite of new consumer standards, the Transparency, Influence and Accessibility (TIA) consumer standard sets out the requirements for complaints handling and states that:

"Section 1.6 - Registered providers must ensure complaints are addressed fairly, effectively, and promptly".

With the specific outcome that:

"2.5.1 Registered providers must ensure their approach to handling complaints is simple, accessible and publicised".

3. In addition to the requirements of the TIA standard, we have a requirement to be compliant with the Code. From 1 April 2024 the revised Code became a statutory requirement for landlords within the Social Housing (Regulation) Act 2023. The Code requires us to publicise an annual performance and service improvement report (PSI) to include a self-assessment of compliance with the Code by 30 June 2024 and annually thereafter.
4. Before this report was introduced, an annual report on customer feedback was provided to Housing and Communities Committee (HACC) each autumn which reported on key complaints trends, performance, service improvements and compliance with the Code. The report also sets out a recommendation that this report replaces the annual customer feedback report as this new PSI report is directly aligned to HO requirements.
5. The report has been developed based on specific requirements set out by the HO in The Code, these are:
 - a) The annual self-assessment to assess our compliance with the Code;
 - b) A qualitative and quantitative analysis of the landlord's complaint handling performance. This must include a summary of the types of complaints the landlord has refused to accept;

- c) Any findings of non-compliance with the Code by the Ombudsman;
- d) Service improvements made as a result of the learning from complaints;
- e) Any annual report about the landlord's performance from the Ombudsman; and
- f) Any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

Findings and Analysis

Service Improvement Plan (SIP) update

6. Following Committee oversight of the Annual Customer Feedback Report in October 2022/23, a range of service improvements were recommended to improve and promote the complaints handling service. These actions are all completed, and outcomes captured in Appendix A.

Self-assessment against the Code

7. An interim self-assessment against the new Code was presented to Board on 28 March 2024 along with a revised Customer Complaints, Compliments and Feedback Policy. Actions were identified from this to enhance and strengthen our compliance in preparation of our publication of the final self-assessment in June 2024. These actions form the SIP for 2024/25 and have been included in the SIP at Appendix A.
8. Almost all actions identified from the self-assessment against the 2024 Code have been completed with the key remaining actions being Board consideration and approval of the PSI report, then publishing the report. It should be noted that all training has been rolled out and employees are due to complete this by the end of June 2024. In line with the completion of the SIP actions, the final self-assessment, was completed in June 2024 with our member responsible for complaints (MRC). Our InsightXchange group were invited to review and challenge the self-assessment and indicate areas where it felt we needed to strengthen the evidence. We met with the group on 7 June 2024 to consider the final self-assessment and it indicated that it was satisfied that the evidence provided demonstrated compliance with the Code.
9. Appendix B provides the full self-assessment against the HO Code which we will publish on our website no later than 30 June 2024.

Analysis of complaint handling performance

10. Appendix C provides further information and analysis to evidence this report.

Service requests

11. The Feedback Team monitors all service requests for completion and works with service areas to ensure they are completed promptly. Our Customer Complaints, Compliments and Feedback Policy defines a service request as *“a request from a resident, that requires action to be taken to put something right”*.
12. In 2023/24 we received 333 service requests from our customers (figure 1 in Appendix C). Fourteen (4%) escalated to a stage 1 complaint meaning 96% were resolved satisfactorily without delays or the need for a formal investigation. The number of service requests received represent 0.1% of customer to business (C2B) transactions that resulted in a service request to put something right. We define customer to business transactions as contacts, service transactions and requests that we receive from customers across both digital and non-digital channels. This is an increase from 2022/23 with 0.07% (185) of transactions resulting in a service request.
13. As expected, due to the volume of C2B transactions, the areas receiving the most service requests throughout the year were the responsive repairs and maintenance service (200/333 – 60%), the housing team (44/333 – 13%) and our assets team (38/333 – 11%).
14. The most common reason for service requests across all service areas was for outstanding works (140/333 – 42%). The majority of these (86/140 – 61%) were for the responsive repairs and maintenance service. It was also the most common reason for service requests for the housing team (16/44 - 36%) and 39% of the assets team (15/38).
15. Service request themes are presented and discussed at monthly learning from complaints meetings with Heads of Service and are reported within the quarterly case review report that is presented to Housing and Communities Committee (HACC). The themes also form part of the transactional customer voice (CV) presented to our InsightXchange during scrutiny reviews to ensure all customer insight is used to influence service improvements.

Excluded complaints

16. Our previous complaints policy (in place until 28 March 2024) clearly sets out what we would not investigate as a Stage 1 complaint. This included service requests, neighbour disputes, or instances where the customer had another appropriate (for example, disrepair claims, legal action, etc.) route to re-dress. On these occasions we would provide advice and guidance on the correct process to follow.

17. We therefore did not capture the number of complaints excluded in 2023/24, as we did not have a process in place designed to do this, nor was it a requirement of the 2022 Code. However, following the introduction of a new process and actions undertaken to comply with the 2024 Code, we are now able to capture and analyse this information.
18. Our revised policy, published and implemented on 1 April 2024, has been updated to reflect reasons for excluding a complaint and a new process implemented to capture these for reporting in 2024/25. We will monitor and analyse excluded cases to ensure that the service remains fair, consistent and accessible whilst also identifying opportunities for further learning. It is also important to note that revisions to the Policy for excluding complaints have been made in line with the 2024 Code.

Stage 1 complaints

19. The start of our formal internal complaints process is Stage 1. We received 80 Stage 1 complaints throughout 2023/24 and upheld 59 (73.75%) in recognition that we could have done better (figure 2). This is a slight increase from 2022/23 where 72.92% of complaints received were upheld. We escalated eight Stage 1 complaints to Stage 2 (figure 3), in comparison to 2022/23 this is an increase of seven, as there was only one Stage 2 escalation. We use the insight and lessons learned from all complaints levels as opportunities to improve our services.
20. The service areas with the highest proportion of overall complaints were Property Services with 53 and the Housing Team with 18 (see figure 4). However, we monitor trends across all services, not just those with the highest numbers, to identify where we are getting things right and where things could be going wrong. During the first six months of 2023/24, data analysis showed us that there had been an unusual increase in the percentage of aids and adaptations cases resulting in a complaint. As this service area is small, this increase was noticeable and prompted a deep dive into the issues our customers were experiencing. Further details are presented at paragraphs 52-54 of this report.
21. In 2023/24 the number of Stage 1 complaints investigated increased by 66.6% (from 48 to 80) when compared to the previous year. The increase in complaints received is welcome and can be attributed to several reasons which included a programme of complaints training for all staff during Q1, 2023/24, to ensure they recognised and escalated complaints on behalf of customers, particularly those seeming less likely to complain. We undertook a social media campaign throughout July 2023 to promote how to make a complaint and, following analysis of the Tenant Satisfaction Measure (TSM) results in Q3, 2023/24, surveyed tenants that had thought they had made a complaint to explain why a complaint was not recorded. For

example, they had reported a neighbour dispute or made a service request.

22. Following the HO's high profile multimedia campaign to highlight the right for tenants to complain and the Government's Make Things Right (MTR) campaign we added details of the MTR to our customer complaints correspondence to promote the complaints service further.
23. The number of C2B transactions has also increased this year, however the proportion of complaints compared to service transactions has been consistent in the last two financial years at 0.02% (figures 5 and 6).
24. We use the insight and lessons learned from complaints as opportunities to improve our services and examples of these are presented throughout this report.

Stage 1 – root causes

25. An analysis has been undertaken against the 98 individual complaint elements that were upheld in 2023/24. The main causes of complaints across the business are as follows:
 - Person (65/98 – 66%)
 - Process (28/98 – 29%)
 - System issues (5/98 – 5%)

Person

26. Complaints relate to a range of issues including:
 - Giving wrong advice
 - Not following procedure
 - Delays in providing a service/returning a call
 - Attitude.
27. These are monitored for trends in service areas and individuals to identify training needs and opportunities for service improvement. In 2023/24 there are no significant themes or causes for people related complaints, however this is carefully monitored to ensure that lessons are learned from individual complaints. Actions taken to date have mainly been related to training on policy and procedure, HO training on Attitudes, Rights and Respect and coaching, and mentoring of new employees to ensure that they are confident and capable of carrying out their roles effectively. We will continue to monitor the effectiveness of these actions and adjust if the desired outcomes are not achieved. These issues are resolved through the remedies implemented following the complaint investigation reaching its conclusion.

Process

28. Complaints have triggered an opportunity to improve a range of processes across the business. Some of the changes have been quick wins, for example training for employees on operating air source heating pumps, whilst others have resulted in significant service improvements. These relate to:

- Process for handling complex/multi trade repairs
- Aids and adaptations process
- Planned works
- Handling reports of pests
- Identifying, recording and responding to vulnerabilities
- Case management across key service areas

System

29. There have been five complaints that have highlighted a system issue as the root cause. These complaints were not specific to one area but have resulted in system improvements such as triggers for texts and overriding automatic issue of system letters.

Stage 1 complaint elements - All service areas

30. Within the 80 complaints received, there were 183 individual complaint elements with 98 (53.6%) of the complaint elements being upheld as there was a service failure. We introduced trend analysis in 2023/24 to identify the common themes of complaints.

31. The three main themes of these were: (figure 7)

- Inaction and/or delays – 28 (28.6%)
- Poor quality of works – 21 (21.4%)
- Lack of professionalism – 13 (13.3%)

Inaction and/or delays

32. All upheld complaints relating to inaction and/or delays were in relation to our Property Team (21/28 – 75%) and Housing Team 7/28 – 25%). This is not unusual when considering the number of C2B transactions carried out by these two service areas. The service improvements implemented to address these issues are set out in this report at paragraphs 39-42 and paragraph 49 respectively.

Poor quality of works

33. Most upheld complaints were in relation to the quality of works delivered by the Property Team (17/21 – 81%). The remaining four complaints related to three other service areas and as such are not a focus for this report, however the findings are discussed with the relevant service areas to consider service improvements. The service improvements undertaken by the Property Team to address quality of works are set out in paragraphs 39-44 below.

Lack of professionalism

34. Over half of the complaints upheld (7/13 – 54%) were in relation to the Property Team, with five (37%) being for the Housing Team and one complaint (8%) for Customer Services. Whilst the number of complaints is low in relation to C2B transactions, we are keen to address the issues to improve the customer experience.

35. We have referred to the HO Spotlight report on Attitudes, Rights and Respects to capture best practice and have begun implementing a training programme in Q1, 2024/25 across all our services, which includes e-learning provided by the Housing Ombudsman. Complaint recommendations following investigation will also address targeted training and development for individuals where required. We will continue to monitor trends and adjust our approach to improving professionalism where needed.

Property Services - (This includes repairs and maintenance, planned works, energy efficiency, gas and electricity servicing and grounds maintenance).

36. 53 Stage 1 complaints were received for the whole of Property Services during 2023/24. This is a 96% increase when compared to the 27 received in 2022/23.

37. 43 (81%) of these complaints were in relation to the joint delivery of our responsive repairs and maintenance service (figure 4 - 15 Repairs team and 28 for Livin Works - Mears). This is a 95% increase on the previous year (22 in 2022/23). The increase in repairs completed from 33,348 in 2022/23 to 37,656 in 2023/24, has resulted in an increase in the proportion of repairs resulting in a complaint from 0.07% to 0.11%.

38. Of the 53 complaints received overall for the Property Services team, there were 122 individual complaint elements. 69 (56.6%) of these were upheld as there was a service failure. The three main themes of these were:

- Inaction and/or delays (of works) - 21 (30.4%)
- Poor quality of works - 17 (24.6%)
- Claims for damages (caused during works) - 11 (15.9%)

Inaction and/or delays

39. We identified that sometimes appointments for follow-up works for complex/multi trade repairs, or where specialist materials needed to be ordered, were not being tracked through to completion. Customers were unhappy that they had to chase repairs and remind us that works were not complete. We referred to the sector case review following publication of the HO special report on London Borough of Haringey to learn from the wider sector and best practice.
40. We identified that our systems and monitoring processes could be improved to assist with tracking.
41. As from Q2, 2023/24 we introduced a weekly meeting to review progress against long term repairs and in Q3, 2023/24 we implemented a new process within our CX (CRM) system to highlight where a complex job repair is in progress. We also commenced Project Own-it in Q2 2023/24 to improve our record keeping, keep better track of ongoing cases, use the customer data more effectively and to embed a culture of ownership around this.
42. In Q4, 2023/24, we also introduced trackable repairs within My Livin (app) to allow customers to be kept informed about ongoing repairs and reduce the need to chase up appointments.

Quality of works

43. A small number of complaints have been received for poor quality of works. Further analysis has shown that this is reflected in satisfaction levels. In addition to the 5% quality checks completed by Livin Works a further 5% of works will be quality assessed by the Property Team inspectors from Q1, 2024/25. This will highlight areas, or trades where service improvements are required. This additional data will be added to our CX system from Q1, 2024/25 to allow a deeper dive and identify opportunities for service specific improvements. Any themes from satisfaction and complaints will continue to inform the targeting of inspections.

Claims for damages

44. We accept that accidents can occur when repairs are undertaken, and we always aim to put things right for the customer at the earliest opportunity. Throughout 2023/24 £1,842 was paid in compensation for accidental damage to personal belongings. The compensation paid was in accordance with our compensation procedure.

Housing Team

45. The housing team delivers the anti-social behaviour, aids and adaptations, allocations and lettings, tenancy management, financial inclusion and rent recovery services.
46. During 2023/24 the team completed 4,671 tenancy visits, 882 allocations, 91 major aids and adaptations works and 381 anti-social behaviour cases. As a proportion, 0.3% of these transactions resulted in a complaint.
47. Twenty Stage 1 complaints were received for the Housing Team during 2023/24 compared to 16 in the previous year.
48. Within the 20 complaints received, there were 47 individual complaint elements. Nineteen elements were upheld as we failed to meet the standard of service expected. The main service areas these complaints related to were ASB and aids and adaptations. The themes of the top three service failures were:
 - Inaction and delays – 7 (36.8%)
 - Lack of Professionalism – 5 (26.3%) – see paragraphs 34-35 for service improvements
 - Not taking account of vulnerabilities early enough and adjusting the way we deliver our service – 3 (15.8%).

Inaction and delays

49. To address these issues, we have used the learning and insight from complaints about the handling of anti-social behaviour (ASB) cases as a basis for scrutinising the service with our InsightXchange group. The 12-week review influenced policy changes and creation of a set of service standards in relation to tailored communication plans, signposting, and setting expectations. This learning has also been applied across other service areas, strengthen case management and how customers are kept updated. A training programme for the team to embed the changes was completed throughout Q4, 2023/24 and Q1, 2024/25. ASB was also highlighted as a performance focus area and updates have been provided to Board on a quarterly basis since Q2 2023/24. Early indications have shown a reduction in complaints and increase in satisfaction. This will be monitored quarterly via the performance management framework for the ASB and Feedback services.

Vulnerabilities

50. Whilst the number of complaints for failing to tailor services to meet customers' needs is low, we have invested in improvements in this area following elements of good practice outlined in key sector learning.
51. We have reflected on the learning from these complaints and referred to the HO Spotlight report on Attitudes, Rights and Respects

to capture best practice. In Q3, 2023/24 we introduced Project Own it (see paragraph 75 of this report). We will continue to monitor trends and adjust our services throughout 2024/25 to meet the needs of customer with vulnerabilities. A new Customer Vulnerability Policy was developed in Q4 2023/24 and approved by Board in May 2024 which includes a service improvement plan to embed the Policy. A Customer Accessibility Policy is also to be introduced in Q3 2024/25. These policies further reinforce our commitment to delivering fair and equitable service outcomes for all.

Stage 1 case review - Aids and Adaptations

52. We regularly analyse insight from feedback and satisfaction surveys to identify opportunities for learning and service improvements. In Q3, 2023/24 we identified that we had received six stage 1 complaints about various elements of the delivery of the aids and adaptations service. Within these complaints we identified 12 individual complaint elements and nine (75%) of these were upheld. We had also received six service requests during this period, one of which escalated to a stage 1 complaint. We compared this data with:
- the percentage of transactions resulting in a complaint (6.6%) and,
 - customer satisfaction levels 83% against a target of 94%.
53. Over the year we completed 91 major adaptations, all complaints related to the service we provided during major works, this means 6.6% became a complaint. We therefore included this service in our case review process.
54. The cross-department case review findings identified seven opportunities to improve the service. This resulted in a service improvement plan, which highlighted opportunities for 'quick wins' in relation to improving contact with customers and case monitoring. Longer-term improvements such as a revised policy and supporting processes, improving communication and joined-up working with the local authority were also identified. Although some of the actions are not due for completion until Q2, 2024/25, we have received no further complaints and satisfaction levels have increased to 98.15% in Q4, 2023/24.

Stage 1 case Review – Damp and pests

55. In Q4, 2023/24 we received a Stage 1 complaint about damp and pest infestation that had resulted in the resident ending the tenancy. The complaint investigation identified opportunities to improve elements of the delivery of the damp and mould service and the advice we provide regarding pest infestations.
56. The cross-department case review findings identified seven missed opportunities to deliver a customer focussed service. This resulted in

a service improvement plan, which highlighted some improvements had already been implemented in relation to the monitoring process for damp works. Long-term improvements such as new processes for damp guarantees, improving record keeping on contact logs and training in relation to escalating dissatisfaction to the Feedback Team. Although some of the actions are not due for completion until Q2, 2024/25, we have received no further complaints of this nature.

Stage 2 complaints

All service areas

57. In 2023/24 we received 12 requests for a Stage 2 review. We did not escalate four of these complaints to Stage 2 as we were unable to clarify the reasons for the review. This was in accordance with the complaints policy that we were working to at that time. Following the publication of the revised Code, we have revised our Complaints, Compliments and Feedback Policy to simplify the escalation process and make it more accessible. As such, we expect Stage 2 escalation refusals to reduce and for Stage 2 complaints to increase in 2024/25.
58. In 2023/24 we escalated eight Stage 1 complaints to Stage 2 (10% of Stage 1 complaints). These were for four separate service areas (Appendix C, figure 8). We overturned the findings for six of these cases (75%) and increased compensation levels and identified further learning opportunities.
59. We are using the learning from Stage 2 complaints to help us improve our investigations at Stage 1. During the year, we have identified that the main reasons for escalation are:
- Not providing a response for all the points raised at Stage 1
 - Customer disagreed with the findings and was dissatisfied with the investigation.
 - Remedies/compensation offered was not enough.
60. Following the increase in Stage 1 complaints requiring a Stage 2 review, we have implemented a new policy and procedure. We have improved the triage process to ensure we are capturing the vital information at the earliest opportunity and to improve this further we are recruiting another complaints adviser. HO e-learning has been rolled out across the organisation and complaints investigators have undertaken bespoke training from HQN.
- ### Remedies
61. In some circumstances we will pay financial compensation to put things right. This could be for distress and inconvenience, time and trouble, delays to works and damage to belongings.
62. We paid £8,464 in compensation following 41 Stage 1 complaints. Of the eight that escalated to Stage 2, we paid a further £1,470 across

four cases. This was paid out in accordance with our compensation procedure and the HO complaint remedies guidance.

Housing Ombudsman Cases (including non-compliance with the Code)

63. During 2023/24 two complaints were referred to the HO and we received the determination back for one. We have also received the determination for the complaint referred in November 2022.
64. We have two findings of non-compliance with the Code. These were following the two determinations received from the HO. Both found maladministration with our complaint handling.
65. It should be noted that, an appeal has been submitted in relation to the determination received for the complaint referred in November 2022. The appeal is specifically in relation to the finding of maladministration for complaint handling as we believe this to be factually incorrect due to the HO's investigation basing their findings on a Complaints Procedure and a Complaint Handling Code that was not in place at the time of the complaint. This was due to us providing the HO with the latest procedure at the time, not the previous procedure that was in place when the complaint happened. We are awaiting the findings of the appeal but in the meantime, have progressed all other orders made by the HO on this case.
66. Further information on the HO findings is detailed in Appendix D.

Special Ombudsman reports

67. We have not had any special reports issued by the Housing Ombudsman in 2023/24.

Learning from complaints

68. Actions and service improvements arising from complaints are tracked by the Feedback Team and monitored via regular progress meetings with the service managers and Heads of Service. Of the 139 actions opened in 2023/24, 13 actions remain open and are being monitored through to completion, these are open due to customers not responding and repairs awaiting completion.
69. Of the 80 Stage 1 complaints and eight Stage 2 escalations received during 2023/24, 52 service improvements have been recommended, with 26 implemented. 26 remain open, 18 of these were identified in Q4, 2023/24. These improvements are outstanding due the complexity of the work required to implement. The Feedback Team are monitoring those outstanding to ensure implementation and meet with the relevant Heads of Service and service managers monthly to track the progress.

70. We have strengthened our learning by completing case reviews. We complete these where we see a significant need to improve the service from individual complaints or where we see a high number of complaints for a particular service area. The process looks at it through the bigger picture, not just focussing on the failings in one complaint but at the issue, understanding it through our identified common causes of complaints. We use these as an opportunity to learn and allow a better understanding of the root cause and put proactive improvements in place to prevent recurrence.
71. This process was improved during Q3, 2023/24, since then we have completed four case reviews. 23 service improvements have been agreed to be implemented because of the case reviews. These actions are monitored through to completion to ensure learning from customer feedback is actioned and improves services as a result. Nineteen of these actions were identified in Q4 and we aim to have these service improvements implemented by end of Q2, 2024/25.
72. In addition to the case review on aids and adaptations, we completed a case review on a specific complaint about damp in Q4, 2023/24. Whilst this review was on one complaint alone, the need for improvements crossed between multiple teams.
73. All service improvements (from complaints and case reviews) are monitored in monthly meetings. We hold learning from complaints meetings with responsible Heads of Service and incorporate learning into our tenant scrutiny group meetings (InsightXchange).

Sector Learning

74. In Q1 and Q2, 2023/24, we completed sector case reviews following the publication of the HO report on Tandridge District Council and London Borough of Haringey. We reviewed our own processes against the key learning within the reports and identified areas we could strengthen. Alongside the consumer regulation review, it highlighted the need for a definition of vulnerability to ensure a consistent delivery approach. In Q4, 2023/24 a vulnerability policy was developed, and it was approved by Board in May 2024. It also identified the need to enhance our systems to allow all relevant contributing information to be viewed in one place to consider vulnerabilities.
75. The HO Spotlight report on Knowledge and Information Management (KIM), encouraged a review of our processes specifically our record keeping of customer information. It embedded an approach of 'Think, Respond, Record'. The review demonstrated that we had similar issues across our complaints to those noted within the KIM report. This led to the development of a KIM implementation plan and a review, "Project Own-it" which assessed all our open cases that fell within our seven common

causes of complaints. This was completed to address issues to prevent escalation to a complaint as well as surfacing vulnerabilities and reasonable adjustment requests that customers had already told us about.

Complaints performance

76. We monitor performance through a range of internal measures and Tenant Satisfaction Measures (TSM's) figure 10 (Appendix 3) provides further information on performance results at year-end 2023/24.

Stage 1 complaints

77. All 80 complaints received during 2023/24 were dealt with within the timescales as set out in the Code from 1 April 2022 to 31 March 2024 (an average of 9.5 days per case). We extended six complaints with the permission of the customers, to allow for a quality and comprehensive investigation due to the complexity of the issues raised.

Stage 2 complaints

78. Of the eight complaints that escalated to Stage 2, 100% were dealt with in 20 working days at an average of 11.5 days per case. This is in accordance with the timescales set out in the Code from 1 April 2022 to 31 March 2024. Two complaints were extended, with the permission of the customer to allow for a quality and comprehensive review of the handling at Stage 1.

Satisfaction with complaints handling

Internal Performance

79. All complainants are provided with an opportunity to complete a satisfaction survey about their experience through the complaints process. 33 responses were received in 2023/24, 31 of these (94%) were satisfied with the way their complaint was handled. One customer was dissatisfied, and one customer provided a neutral response; neither gave reason for their answer.

Tenant satisfaction measures (TSMs)

80. The TSM perception surveys were completed in July 2023 and included complaint handling metrics. The result for "satisfaction with the landlord's approach to complaint handling" was 48.40%. This is lower than our internally monitored transactional satisfaction survey results completed following the closure of a formal complaint, which was 93.94% in 2023/24. However, comparison with HouseMark mid-year benchmarking results placed us in the upper quartile. It should be noted that some organisations had not fully completed their TSM

survey by the mid-year point and this position could therefore change.

81. Analysis of the TSM survey responses demonstrated that not everyone answering this question had been through the formal complaints process. We then assessed if the contacts made should have been opened as formal complaints rather than handled as service requests. We found that of the 82 responding to the question, only five had made a formal complaint. One had made an enquiry via their MP and twelve had been handled as service requests. This was also reported to Board in December 2023 in the TSM report.
82. We contacted the remaining 67 respondents to establish their understanding and accessibility of the service, however only six responses were received.
83. Based on the feedback and the analysis of the TSM results, we initially made the following service improvements:
 - Social media campaign to highlight how to make a complaint
 - Training of all employees on how to recognise a complaint and encourage tenants to give feedback
 - Developed and published a simplified version of the Complaints, Compliments and Feedback Policy
84. We have continued to identify opportunities to improve the complaints handling service and the latest service improvement plan is presented at Appendix A.

Material considerations

Strategy

85. Delivery of an effective complaints handling process links directly to the objectives set within Plan A 2022/25; Transforming Customer Experience and Digital Services strategy objectives follows:
 - Objective 3 – Deliver an effective framework for tenants to engage and influence that is meaningful, open, and honest to continuously improve services.
 - 3.2 Encourage customer feedback and deliver a brilliant complaints service to ensure customers can challenge and influence positive service improvement.

Customer voice

86. On 22 May 2024, we shared the initial complaints handling statistics, trends and service improvements with our InsightXchange group. The group were assured with the initial information provided, but we

agreed to hold a further session with details of the self-assessments to evidence compliance with the TIA and the Code.

87. The self-assessments were shared with the InsightXchange group in the two weeks leading up to the session on 7 June 2024 to allow them time to scrutinise and prepare questions beforehand. During the session, the group confirmed they were satisfied with our compliance position on the self-assessment.

Impact assessments

88. Transactional analysis of EDI data has been undertaken in relation to formal complaints received in 2023/24 as a comparator against out tenant demographic, where complainants have provided this information. EDI information is not held in some instances for complaints made by non-tenants. Appendix E provides an EDI breakdown for complaints.
89. Service usage by protected characteristic for complaints. The analysis has found that customers with disabilities/long-term health conditions are accessing the service. 60% of complaints were from people who considered themselves to have a disability/long-term health condition which is a higher proportion than the overall customer base. No complaints were received regarding discrimination. We upheld four complaints due to us not fully taking account of the customer's vulnerabilities.
90. Analysis shows that older customers are less likely to make a formal complaints and numbers are disproportionate compared to the tenant base. A new impact assessment has been completed for the new Policy, which also considers vulnerabilities as well as protected characteristics. It identified that those who experience communication difficulties or language barriers are less likely to submit a complaint.
91. The new Policy has addressed the issues highlighted by making provisions for information about how to complain to be provided to some tenants in different formats, supporting customers to appoint an advocate to assist them with their complaint, promoting translation and interpretation services, and working with customers to understand their needs and ensuring they receive their complaint response that they can understand.

Legal and regulatory

92. The main body of the report outlines the relevant regulatory requirements that the Complaints, Compliments and Feedback Policy is aligned to. The new Consumer Standards that were published on 29 February 2024, effective from 1 April 2024. The TIA Code of Practice has been considered as part of the Policy and the requirements have been factored into the policy to ensure

compliance. The TIA standard also requires landlords to provide tenants with accessible information about services, particularly in relation to their rights and responsibilities and the landlord's obligations. This requirement includes the Complaints and Feedback service. The new Policy also ensures we are compliant with the with the Code.

Finances and value for money

93. £9,934.22 was paid in compensation in 2023/24. Failure to conduct fair and effective complaint handling can impact on achieving value for money and potentially incur greater costs if failures are identified in complaints that have been reviewed by the HO.
94. As complaint numbers have increased there has also been a need to increase the complaint's compensation budget from £3,000 to £8,700 following an overspend of £6,934 in 2023/24. We will continue to monitor compensation payments to ensure that payments are fair, reasonable and reflect the level of service failure and circumstances of the complainant.

Risk

95. The Customer Complaints, Compliments and Feedback Policy helps mitigate against the following strategic risks:
 - Failure to deliver against customer expectations.
 - Failure to demonstrate compliance with/breach of RSH requirements including regulatory standards.
96. Board has set a minimal risk appetite for customer satisfaction and an averse appetite for regulatory compliance and G1 grading. Section 11 of the Policy includes a set of monitoring and compliance and assurance arrangements updated in the risk register. A review of the Strategic Risk Register (SRR) identified a need to align the SRR with the Consumer Standards, which also covers complaint handling. This work is currently underway and expected to conclude in July 2024.

Conclusions

97. The self-assessment shows that we are compliant with the 2024 Code. The actions identified in the Customer Complaints, Compliments and Feedback Policy Review presented to on 28 March 2024 have been delivered ensuring the new requirements of the Code are fully embedded.
98. The complaints handling performance, resolutions achieved, and customer satisfaction indicators presented within this report demonstrate that overall, an effective service is provided in line with the 2022 Code. The report also demonstrates the concerted

improvement work undertaken during the year by learning from complaints we have received and wider sector learning. We have focused on key improvements around the capture and usage of data, effective case management and communication, and taking a joined-up view of the customer across services to provide a better customer experience.

99. The increase in complaints received during 2023/24 was anticipated following the increased due to the increased awareness around how to make a complaint and an increased focus across the sector. The high percentage of upheld complaints in 2023/24 also demonstrates that services on these occasions were not being delivered to the required standard. This increase in complaints is therefore positive and has given us an opportunity to put things right for customers and further improve services. We have expanded the number of complaints handlers along with revised complaints handling training to ensure we increased the capacity to efficiently manage this increase, which is expected to continue.
100. Complaints serve as valuable feedback from our customers so we can learn and improve services when things have gone wrong. The service continues to improve and enhance processes to capture this learning and where services have been revised as a result, ensuring customers are kept informed of the outcome.

Recommendations

101. That Board:

- Confirms it is assured of the ongoing effectiveness of the complaints service;
- Approves this report for publication to our customers and the HO; and
- Approves our self-assessment against the Code for publication.
- Approves that the PSI report replaces the annual feedback report that was previously considered by the Housing and Communities Committee.
- Provides their response to the contents of the report which will accompany the published report

Implementation

102. The Director of Customer Experience and Insight is responsible for the compliance with complaints policy and procedure and the Code with oversight from the MRC's. The HACCC is our governing body that received updates on our complaints handling, learning and outcomes.

Appendices

A	Service Improvement Plan
B	Self-assessment against the HO Complaints Handling Code June 2024
C	Complaints and Feedback Analysis 2023/24
D	Housing Ombudsman Findings
E	Complaints EDI Breakdown

Background papers

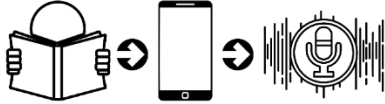
Last report on this issue:	Board, March 2023 Customer Complaints, Compliments and Feedback Policy Review Board, December 2023, TSM Report
Other key information:	<p>Housing Ombudsman Service 2024 Complaint Handling Code: https://www.housing-ombudsman.org.uk/wp-content/uploads/2024/04/02.-Complaint-Handling-Code-24.pdf</p> <p>Regulator of Social Housing Final Consumer Standards: Final Consumer standards (publishing.service.gov.uk)</p> <p>Regulator of Social Housing Consumer Standards Code of Practice: Final Consumer Standards Code of Practice (publishing.service.gov.uk)</p> <p>Housing Ombudsman Spotlight on: Knowledge and Information Management Report: Knowledge and Information Management (KIM) Housing Ombuds (housing-ombudsman.org.uk)</p> <p>Housing Ombudsman Special Report on: Haringey London Borough Council: Haringey London Borough Council (202110720) - Housing Ombudsman (housing-ombudsman.org.uk)</p>

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