

Title: Complaints Handling Performance

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Meeting Date: 21 July

1. Background

- 1.1. The Social Housing White Paper, published in November 2020, mapped out the future for social housing providers in terms of regulation and strengthened consumer protection. The content of the White Paper was captured in a [Charter for Social Housing Residents](#) that made a commitment for residents to *'have your complaints dealt with promptly and fairly, with access to a strong ombudsman who will give you swift and fair redress when needed'*
- 1.2. This included strengthening the powers and role of the Housing Ombudsman and the creation of a national [Complaint Handling Code](#), outlining the requirements of how all social landlords manage and learn from complaints and to support a positive complaint handling culture.
- 1.3. Within this context the service wishes to update the Leeds Housing Board on activity related to the management of complaints, specifically:
 - a) Overall complaints performance for 2022/23
 - b) Complaints' satisfaction monitoring findings
 - c) Our wider complaints management activity

2. Performance Update for 2022/23

A summary of overall performance for 2022/23 is below:

Indicator	Apr – Jun 2022	Jul – Sep 2022	Oct – Dec 2022	Jan – Mar 2023	2022/23 Total
Stage 1 complaints received	553	535	653	664	2,405
Stage 1 responded to within 10 working days	59%	61%	61%	57%	60%
Stage 1 responded to within 15 working days	74%	73%	76%	71%	74%

Indicator	Apr – Jun 2022	Jul – Sep 2022	Oct – Dec 2022	Jan – Mar 2023	2022/23 Total
Stage 2 complaints received	114	118	142	136	510
Stage 2 responded to within 15 working days	61%	67%	67%	64%	65%

- 2.1. Note that the overall LCC Policy is to respond to stage 1 complaints within fifteen working days. However, in line with the Housing Ombudsman Complaint Handling Code we have amended the policy to acknowledge that the response timescales are now ten working days (with up to 5 days to acknowledge) for housing complaints. There is an increased focus on timescales by the HOS in light of upcoming consultation with councils around a joint code with the Local Government and Social Care Ombudsman.
- 2.2. Performance overall for last year was below our target of responding to 95% of complaints within timescales, however, a number of management and improvement actions have been put in place. Please see the update on wider management activity below.
- 2.3. Following a query from the Housing Ombudsman during February, we reviewed all open complaint cases over the last 12 months, and this was a useful exercise to improve complaints records (with some complaints responded to that had not been recorded as such). This gives the service a better baseline position and better-quality records to monitor performance for the year ahead.
- 2.4. For May 2023, our latest full performance month, we are currently responding to 90% of stage 1 complaints within timescale and 83% of stage 2 complaints in timescale. This is an indication that performance is improving and that the measures put in place to improve are having an impact.
- 2.5. In terms of Ombudsman cases, during 2022/23 we received:

	HOS assessment	HOS Formal*	LGO assessment	LGO formal
Q1	8	14	0	5
Q2	7	11	1	1
Q3	4	8	1	2
Q4	3	10	3	3

*Formal cases are those which the Ombudsman will investigate, whereas assessment requests are where the Ombudsman ask us for information, and these can progress to formal cases. The HOS are more likely to progress straight to formal investigation than the LGO.

- 2.6 From those received, outcomes to date for cases opened during 2022/23 are:
- 10 cases were closed after the initial enquiry with no further action required or were outside of jurisdiction.
 - 6 cases were not upheld
 - 9 cases were upheld (with a decision letter and remedies outlined)
 - 4 cases the HOS found a service failure (with a decision letter and

remedies outlined)

- 1 case of severe maladministration (see below)

2.7 In January the Housing Ombudsman issued a [severe maladministration finding against Housing Leeds](#) related to our handling of a water leak and subsequent actions and impact to a tenant over a two year period. The case provided a significant opportunity to identify the lessons learnt and a number of actions have been implemented as a result. For example:

- Sharing the learning as a case study with all staff and our contractors.
- Provided refresher training/extra guidance for all officers who investigate and respond to complaints to make sure that we are meeting our service standards.
- Ensuring 'out of hours' staff have mobile devices to update repairs information to allow day-time staff access to information on any activity outstanding.

3. Satisfaction Monitoring

3.1. The Housing Ombudsman's [Complaint Handling Code](#) requires all social landlords to create a '*positive complaint handling culture through continuous learning and improvement*'. To help do this, we undertake monthly satisfaction surveys to try and better understand the customer experience of the complaints process. In the second week of the month, a text message is sent with a survey link to those customers who have had a complaint closed in the previous month. There have been 271 responses informing the findings for 2022/23, and 200 responses received during 2021/22 for comparison.

3.2. The survey is likely to achieve lower results by the nature of the topic and how it is difficult to separate the complaint outcome (which may or may not be upheld) with the overall quality of the process. The survey design is therefore focused on the quality of the process in terms of how well we communicate, listen, and respond to the complaint – not about the complaint outcome. The survey is also completed by relatively small numbers of residents, and we know residents are more likely to complete if they remain unhappy. We therefore use the results as a guide to identify learning opportunities.

3.3. **Summary from 2022/23**

3.4. When comparing overall satisfaction of this year to last, the key findings are that:

- Overall satisfaction with how we handle complaints has increased from 15% to 20%
- Satisfaction with the speed with which we manage complaints has risen from 21% to 28%

- Satisfaction with how well we have kept a resident informed about the progress of their complaint has fallen from 25% to 21%
- Satisfaction with how well we listened and understood a person's complaint fell from 24% to 21%
- Satisfaction with how well we took a resident's individual circumstances into account fell from 20% to 18%
- Satisfaction with how much we cared about putting the complaint right fell from 20% to 17%
- 67% of respondent said they would feel confident making a complaint again, which is an increase of 10% from last year's 57%.
- The survey includes a final question, "Is there anything you would like to tell us about how we managed your complaint?". This year 8% had something positive to say, which is up from 5% last year.

3.5. Learning outcomes from satisfaction monitoring are that:

- We continue to share a monthly learning from complaints feature in Housing Leeds Matters, the internal staff bulletin.
- Identifying those cases where satisfaction is poor or if there is an issue outstanding so we can highlight to the relevant team and proactively intervene if value or benefit for the customer in doing so.
- Changes to the standard response templates to make clearer the requirement for investigating officers to contact the customer to talk about their complaint and to ensure we acknowledge this in the final response.

4. Wider complaints management activity

4.1. To strengthen our approach to complaints management we have undertaken the following actions:

- a) The Wider Housing Leadership Team received an update on our complaint performance and improvement activity in March. This helped reinforce the message across the service about the importance of meeting timescales, giving quality responses and making sure we communicate effectively with the customer.
- b) We have delivered four 'Investigating Officer' training/refresher sessions with a further eighty investigating officers from across the service. This reminds investigating officers about good practice and requirements of the complaints process, especially the importance of making contact with the customer to understand their complaint so we can effectively respond. We will continue to offer training and support for those staff and teams who may need this.
- c) Over the last 18 months, the service has undertaken a number of Quality Assurance checks on a sample of complaints responses. These checks compare our responses to the requirements of the Complaint Handling Code and have been used to identify service improvements, training needs and content for regular reminders about good complaints handling

in the staff bulletin. This has also helped us identify good complaint responses to share.

- d) Each December, we complete the Complaint Handling Code Self-Assessment and [publish a summary on the website](#). BITMO are to undertake their own self-assessment against the code (in line with good practice), however, Housing Leeds remain responsible for BITMO's management of complaints as whole. We will ensure reporting and compliance against the code from BITMO as part of our future assurance framework with them.
- e) The Housing Ombudsman continue to share 'spotlight' reports and also cases of severe maladministration from social landlords nationally that are reviewed by the service to identify lessons learnt and integrate this within existing service improvement plans.
- f) The Regulator for Social Housing has confirmed the inclusion of a complaints related satisfaction question within the overall suite of 'Tenant Satisfaction Measures'. To acknowledge that only a small proportion of customers raise a complaint with us, a filter question has been added in 2023/24, i.e. our satisfaction survey asks 'have you made a complaint in the last 12 months?' and if so 'how satisfied or dissatisfied are you with your landlord's approach to complaint handling'. For 2022/23 our satisfaction was 23%. This is a new question that was added in Q4 and so no direction of travel information is available.
- g) The Regulator for Social Housing TSM's also require landlords to report on management information related to complaints, our performance within timescale and also the number of complaints relative to the size of the landlord (per 1,000 homes owned). More information will be provided to the board as the year progresses on our performance against the TSMs as a whole. With the arrival of national TSMs we will also participate in wider benchmarking with comparable landlords.
- h) We are engaging with other landlords through the Housing Quality Network (HQN) to seek to improve the accessibility of our standard response templates. We are keen to use less formal and escalatory language. This is also something we have discussed with the Housing Ombudsman Service who are themselves wanting to update their guidance on.
- i) Related to the above, the service is currently commissioning some bespoke training from HQN on '*high quality written responses to complaints – values into action*'. This will help investigating officers to respond to complaints in a more customer friendly tone and more accessible format.

5. Recommendations

5.1. The Leeds Housing Board is recommended to note and comment on the data included in this report.