

Title: Complaints Handling Performance

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1. Introduction

1.1. The service wishes to update the Leeds Housing Board on activity related to the management of complaints, specifically:

- a) Full year complaints performance for 2023/24
- b) An overview of complaints by type and issue
- c) Complaints' satisfaction monitoring findings
- d) Our wider complaints management activity
- e) Our most recent self-assessment against an updated Complaint Handling Code
- f) The Member Responsible for Complaints (MRC) role

2. Performance update

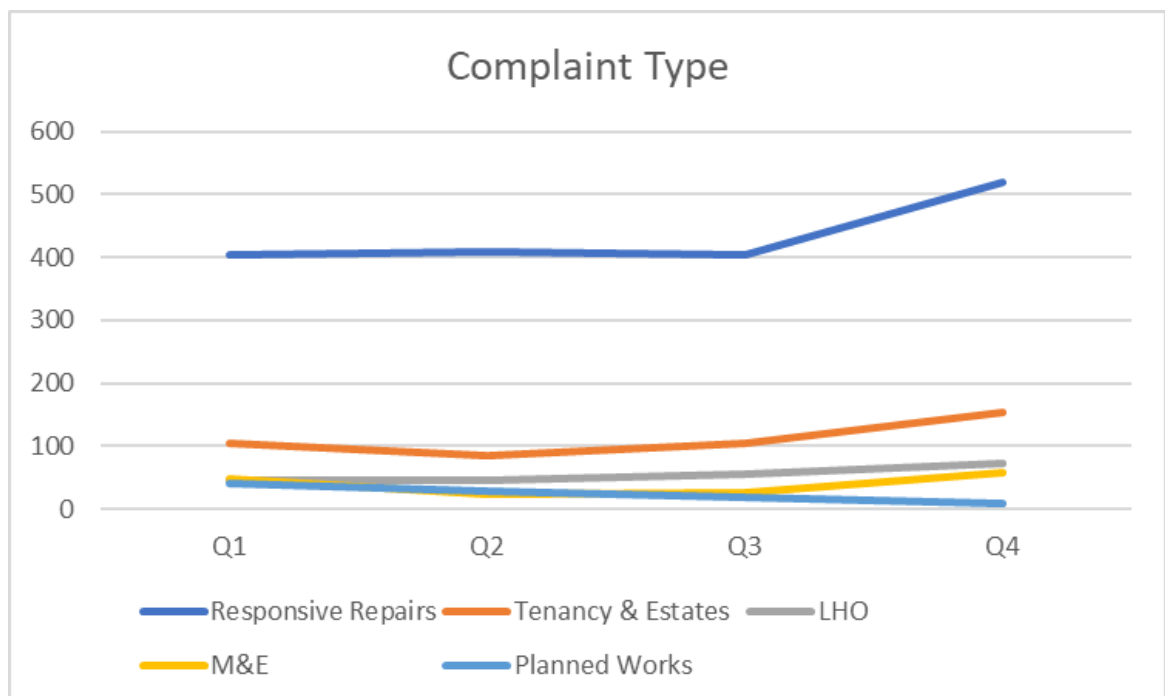
A summary of performance is below:

Indicator	Q1	Q2	Q3	Q4
Stage 1 complaints received	590	532	543	696
<i>Previous year comparison</i>	552	536	655	668
Stage 1 responded in code (10 working days or with an extension)	82.7%	93.0%	88.2%	87.5%
<i>Previous year comparison</i>	74.6%	73.7%	76.0%	73.2%

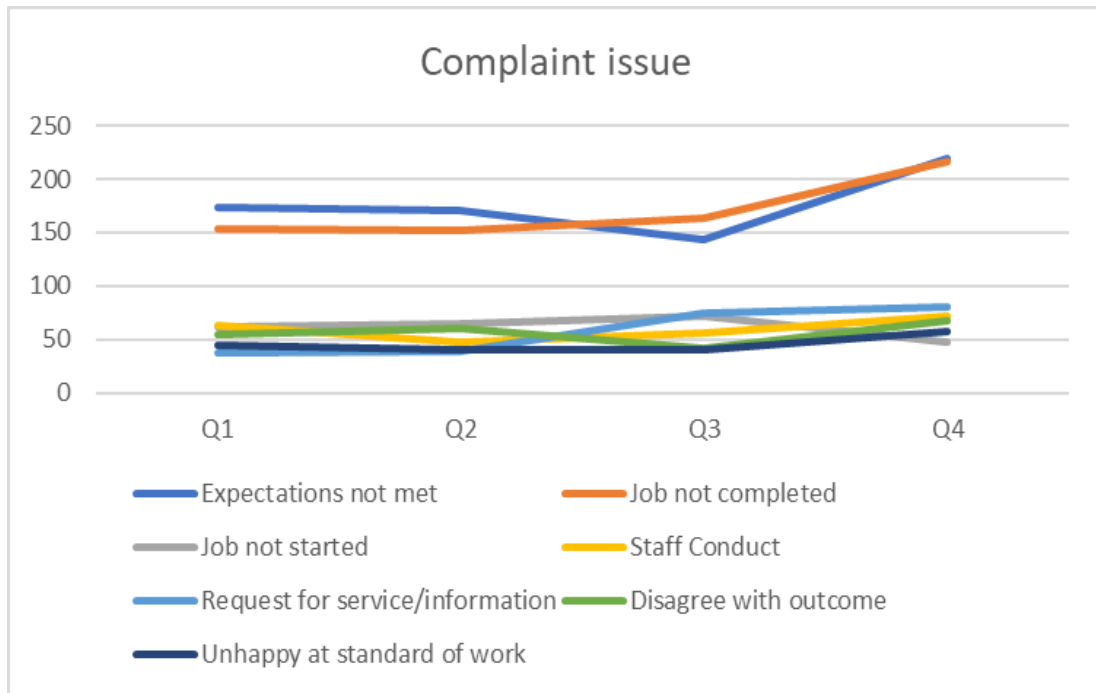
Indicator	Q1	Q2	Q3	Q4
Stage 2 complaints received	139	143	134	173
<i>Previous year comparison</i>	114	118	145	136
Stage 2 responded in code (20 working days or with an extension)	88.5%	88.8%	83.6%	90.8%
<i>Previous year comparison</i>	60.1%	67.0%	67.6%	63.4%

- 2.1. As of 1 April 2024, the Housing Ombudsman Complaint Handling Code became statutory. After consultation last year, the [Complaint Handling Code was updated](#). The updated code is not a joint Housing and Local Government code (as expected) – recognising that the Housing Ombudsman and the Housing code are now statutory requirements, unlike the LGSCO Code, which is non-statutory, best practice guidance. A [presentation for local authorities](#) about the Code is more detail is available.
- 2.2. Tenant Satisfaction Measures (or TSMs) performance related to complaints will be provided to the board separately.

- 2.3. Performance for the year has improved from 2022/23. At stage 1, 87.8% of complaints received a response in timescale or were compliant with the complaint handling code, improved from 74.4% in 2022/23. At stage 2, 88.1% of complaints received a response in timescale or were compliant with the complaint handling code, improved from 65.0% in 2022/23.
- 2.4. For April 2024, our latest full performance month, we are currently responding to 87.9% of stage 1 complaints within code requirements and 94.5% of stage 2 complaints.
- 2.5. Complaints by type - The largest complaints by type relate to our day-to-day repairs service, reflecting the volume of activity undertaken. We undertake approximately 200,000 repairs a year, with less than 1% of repairs resulting in a stage one complaint being received. The chart below presents complaints by volume over the last four quarters for the five highest service areas.
- 2.6. The volume of complaints for Quarter 4 is higher than in Quarter 4 22/23, however, this may not reflect changes in service levels and is likely to be influenced by a number of factors including various promotions and campaigns to highlight how residents can access the complaints process and dealing with fewer cases informally to ensure compliance with the code and give clarity to the customer on the status of their complaint. During this time overall satisfaction with the service and the repairs service has also improved.



- 2.7. For each complaint received, we record the key issue in terms of what has led to the failure or complaint being received.



2.8 All managers have access to a complaints dashboard which gives an overview of complaints by stage, area, type, issue, and sub issue. Teams can filter this to produce meaningful information for their specific area and highlight any trends or concerns. The dashboard also records the date a complaint was received for managers to monitor complaints responses in timescales.

2.9 Whilst there has been an increase in complaints relating to repair jobs not completed' since Q3, we have also seen a corresponding month on month increase in customer satisfaction with repairs during the quarter. Alongside this, we have also seen a continuing month by month reduction in the quarter of the overall volume of live repair jobs. We will continue to monitor trends over the coming periods and work with providers to determine any further improvement measures if this trend continues. We are currently finalising a review of our Tenant Handbook, as well as reviewing our published service standards on the leeds.gov webpages, and alongside the promotion of better quality communication with residents, we are hopeful that this will help improve the way that we manage residents' expectations.

2.10 A summary of BITMO performance for the same period is below:

Indicator	Q1	Q2	Q3	Q4
Stage 1 complaints received	10	10	6	6
<i>Previous year comparison</i>	4	1	14	12
Stage 1 responded in code (10 working days or with an extension)	90%	90%	83%	100%
<i>Previous year comparison</i>	0%	100%	64%	100%

Indicator	Q1	Q2	Q3	Q4
Stage 2 complaints received	3	2	5	2

<i>Previous year comparison</i>	2	1	4	2
Stage 2 responded in code (20 working days or with an extension)	100%	100%	60%	50%
<i>Previous year comparison</i>	100%	100%	75%	50%

2.11 In terms of Ombudsman cases, during 2023/24 we received:

	HOS assessment	HOS Formal*	LGO assessment	LGO formal
Q1	6	6	2	5
<i>Q1 last year</i>	7	14	2	5
Q2	7	10	3	6
<i>Q2 last year</i>	7	11	1	1
Q3	9	10	0	1
<i>Q3 last year</i>	5	8	1	2
Q4	13	16	5	2
<i>Q4 last year</i>	4	10	3	3

*Formal cases are those which the Ombudsman will investigate, whereas assessment requests are where the Ombudsman asks us for information, and these may or may not progress to formal cases. The HOS are more likely to progress straight to formal investigation than the LGO.

2.12 Outcomes received during 2023/24 are:

- 11 cases were closed after the initial enquiry with no further action required or were outside of jurisdiction.
- 9 cases were not upheld
- 27 cases were upheld (with a decision letter and remedies outlined)
- 8 cases the HOS found a service failure (with a decision letter and remedies outlined)

2.13 In May the Housing Ombudsman issued a severe maladministration finding against Housing Leeds related to our handling of a complex structural repair and subsequent actions and impact to a family. The case provided an opportunity to identify the lessons learnt and actions have been implemented as a result. For example:

- Sharing the learning as a case study with all staff and our contractors.

- Providing refresher training/extra guidance for all officers who investigate and respond to complaints to make sure that we are meeting our service standards.
 - Introducing improved procedures for managing this type of complex repair.
 - Reviewing our procedures for capturing and tailoring our services to meet vulnerability needs.
- 2.14 A further case outcome has identified the need to make sure that all complaint responses are in writing. The LCC Complaints Policy advises that responses can be written or verbal, but the Housing Ombudsman Code specifies that they must be in writing. We are reviewing this with staff and will review the wording in the policy also.
- 2.15 The Housing Ombudsman has changed its approach to publishing severe maladministration cases moving forward. Instead of publishing each case individually a monthly 'learning from severe maladministration report' will be published by the HOS. A copy of the May release is [here](#), which includes the case outlined in 2.13.
- 2.16 We are currently developing a system to monitor outcomes, actions, and learning from Ombudsman cases. This will help us to monitor compliance and report learning to the Board. It will also help collate information for our Annual Report.

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 who have had a complaint closed in the previous month. There were 271 responses informing the findings for 2022/23. For Q1-Q3 2023/24 (Apr-Dec) we received 140 responses. Data is currently being processed for Q4.
- 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 a relatively small numbers of residents, with residents more likely to complete if they remain unhappy. We therefore use the results as a guide to identify learning opportunities.
- 3.3. **Summary for 2023/24**

- 3.4. When comparing satisfaction for 2023/24 to 2022/23, the key findings from our own internal satisfaction monitoring are that:
- **Overall satisfaction** with how we handle complaints has **increased** from 20% to 29%
 - Satisfaction with the **speed with which we manage complaints** has **risen** from 28% to 34%
 - Satisfaction with how **well we have kept a resident informed** about the progress of their complaint has **risen** from 21% to 32%
 - Satisfaction with **how well we listened and understood** a person's complaint has **risen** from 21% to 38%
 - Satisfaction with how well we took a **resident's individual circumstances into account** has **risen** from 18% to 28%
 - Satisfaction with **how much we cared about putting the complaint right** has **risen** from 17% to 28%
 - 76% of respondents said they would **feel confident making a complaint again**, which is an **increase** of 9% from last year's 67%.
 - The survey includes a final question, "Is there anything you would like to tell us about how we managed your complaint?". **20%** of respondents had something **positive to say**, which is up from 8% last year.
- 3.5. Information from recent satisfaction monitoring has helped us to:
- Provide practical advice and reminders that we share in a monthly learning from complaints feature in Housing Leeds Matters, the internal staff bulletin.
 - Identify 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.

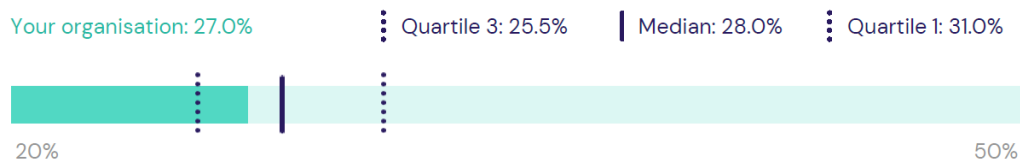
4. Wider complaints management activity

- 4.1. To strengthen our approach to complaints management we have undertaken the following actions:
- a) In the ongoing appraisals, all staff will be set a complaint's related objective (as per Code requirement).
 - b) We continue to deliver monthly 'Investigating Officer' training/refresher sessions for investigating officers from across the service. This reminds investigating officers about good practice and requirements of the complaints process, especially the importance of contacting 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 need this.
 - c) As a result of an Ombudsman outcome, BITMO with effect from the 1st May adopted the LCC Complaints Policy to help strengthen and simplify our compliance with the code. The HOS stating from this case that Housing Leeds remain the landlord of BITMO managed homes and we are

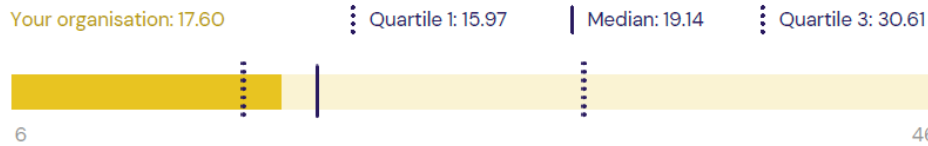
responsible for responding to complaints in compliance with the code. The Self-Assessment against the code (see later in this report) therefore includes the position of BIMO.

- d) The Housing Ombudsman continue to share 'Spotlight' reports and cases of severe maladministration from social landlords nationally that are reviewed by the service to identify lessons learnt. In February 2024 the HOS published a Spotlight report on '[Attitudes, respect, and rights – relationship of equals](#)'. This includes several recommendations for the future of social housing to landlords and policymakers and suggest what changes need to be made in both the short and long term. This is currently being reviewed by the service. In addition, the service promoted to tenants the opportunity to be part of the Housing Ombudsman Resident Panel and promoted the Housing Ombudsman 'Make Things Right' campaign.
- e) In April, the Tenant Scrutiny Board selected complaints as their next review topic. Specifically, looking at how we can ensure all complaints are responded to within compliance of the code and how we learn from complaints and reports outcomes back to customers. We will support the board in their review and draw in practice from other landlords to help the board in their evidence gathering.
- f) The service participated in a voluntary mid-year Housemark TSM benchmarking exercise. When comparing performance with our peer group, performance six months ago was similar to that of other large urban landlords. Though should be noted that year end TSM results are now required to be submitted by all landlords to the Regulator for Social Housing for 2023/24 which will enable us to benchmark more reliably in the future.

TPO9: Landlord's approach to complaints handling



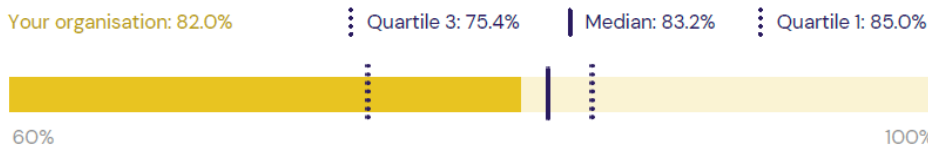
CHO1(1): Number of stage one complaints received per 1,000 homes



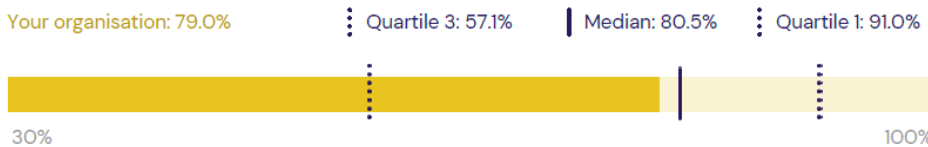
CHO1(2): Number of stage two complaints received per 1,000 homes



CHO2(1): Stage one complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales



CHO2(2): Stage two complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales



- g) We continue to engage with other landlords through the Housing Quality Network (HQN) to discuss and share best practice.
- h) The service continues to receive compliments on it's complaint handling for example, a recent compliment received by Lianne Vickers, in the Repairs Intervention Team, stated *"Thank you for the caring and considerate way in which you have handled my complaint, which you have done your best to resolve. You have been in touch frequently to keep me up to date with all your efforts."*

5. Complaint Handling Code Self-Assessment:

- 5.1. A full copy of the self-assessment against the updated Code is attached to this report.
- 5.2. In January our self-assessment against the previous code was assessed as fully compliant. For the latest version of the code, we are not currently compliant in the following aspects. To be fully compliant with the updated code, the following actions are required:

- a) To improve from 88% to 100% the responses to stage 1 complaints within the initial 10 working days, or within an extension time period as per code guidance.
 - b) Similar to above, improve from 88% to 100% the responses to stage 2 complaints within 20 working days or within an extension as per code guidance.
 - c) To update the complaints policy to state how we publicise our policy and share information about the Complaint Handling Code.
 - d) To make more explicit in the complaints policy the difference between service requests and complaints.
 - e) Have in place an approach to keep any reasonable adjustments 'under active review'. This is linked to wider actions related to the HOS Spotlight report being managed through our wider Social Housing Regulation work.
 - f) To review the forward work programme of the Leeds Housing Board to ensure an annual complaints report is provided and a response from the board (and the annual report) is published online and promoted to residents.
 - g) To identify a 'suitably senior lead person as accountable for complaint handling'. We proposed that Gez Tinsdale, as Chief Officer Housing is the senior lead person accountable for complaint handling.
 - h) To confirm an (elected) 'Member Responsible for Complaints'
- 5.3. More detail on the required actions in response to areas of non-compliance is outlined in the self-assessment.
- 5.4. The new Code requires that a 'Member Responsible for Complaints' (or MRC) is appointed. The member is responsible for supporting a positive complaint handling culture and ensuring that insight on complaint handling and performance is shared with the 'governing body'.
- 5.5. The MRS should be a member of the governing body (the Leeds Housing Board) and within a local authority, means a lead member or a Councillor who has oversight in the cabinet for housing. The MRS has a [role profile](#) and additional information about the role has been shared by the HOS in the form of [FAQ's](#).
- 5.6. To date we have engaged the tenant Housing Board members who are all supportive of undertaking a more active complaints scrutiny role as part of board activity. We propose this remains the case and we continue to invest in tenant board member development in this area to help strengthen tenant influence.
- 5.7. However, to fully comply with the Code it is recommended that an Elected Member of the LHB takes on the formal role of Elected Member Responsible for Complaints (MRC). It is proposed that Councillor Jordan Bowden as Deputy Executive Member for Housing takes on this role. If supported by the Board, we would wish to discuss the practicalities of the role including how the Tenant Board Members can support Cllr Bowden in fulfilling this role.

- 5.8. The Housing Ombudsman now has a legal duty to monitor compliance with the Code and therefore we are required to submit our self-assessment by the 30th June 2024. The self-assessment must also be published on our website and in wider resident communications.
- 5.9. The next steps by the service are therefore to make the changes required to comply as far as possible with the requirements of the new Code ahead of sharing the outcome of the self-assessment with the HOS and residents at the end of June.

6. Recommendations

- 6.2. The Board are asked to note and comment on the information included in this report.
- 6.3. The Board support the proposed actions to strengthen our compliance with the HOS Complaints Handling Code, including support for Gez Tinsdale, as Chief Officer Housing taking the role of lead person accountable for complaints.
- 6.4. The Board confirm the appointment of Councillor Jordan Bowden to act as the formal Member Responsible for Complaints (MRC) and for discussions to take place on putting the role into practice alongside and with support from Tenant Board Members.