

Housing Services Annual Complaints Performance and Service Improvement Report and Self-Assessment

Committee:	Cabinet
Date of Meeting:	31 July 2025
Report of:	Head of Housing and Corporate Assets
Portfolio:	Housing and Corporate Assets

1. Purpose of Report

- 1.1 To note the requirements of the Housing Ombudsman Complaint Handling Code to complete an annual complaints performance and service improvement report, including a self-assessment against the code.
- 1.2 To seek Cabinet approval for the Housing Services Annual Complaints Performance and Service Improvement Report.
- 1.3 To note the contents of the self-assessment form and its subsequent publication on the Council's website.

2. Recommendations

- 2.1 That Cabinet:
 - i) Note the contents of the Annual Complaints Performance and Service Improvement Report and self-assessment.
 - ii) Approve the Report and the outcomes from the self-assessment form, further to its subsequent publication on the Council's website and submission to the Housing Ombudsman.

Reasons for Recommendations

- 2.2 To adhere to membership requirements of the Housing Ombudsman and its Complaint Handling Code 2024 for Landlords to produce an annual complaints performance and service improvement report for scrutiny and challenge by Cabinet, which must include the annual self-assessment against this Code to ensure complaint handling policy remains in line with the Ombudsman's requirements.

3. Key Issues

- 3.1 The Council is required to comply with the Housing Ombudsman's Complaint Handling Code, its latest revision being applicable from 1 April 2024.
- 3.2 One of the implications is the completion of an annual complaints performance and service improvement report, including a self-assessment against the Code. This report forms the annual complaints and service improvement report, and the self-assessment is attached as Appendix 1. The Ombudsman expects landlords to report their performance report and outcome of their self-assessment to their board members or, in the case of local authorities, elected members.

- 3.3 The Ombudsman expects landlords to carry out regular self-assessment against the Code and take appropriate action to ensure their complaint handling is in line with the Code.
- 3.4 The updated self-assessment finds that Housing Services continues to adhere to the vast majority of the requirements in the Code as a result of the provisions set out in the Corporate Customer Feedback and Complaints Procedure.

4. Relationship to Corporate Priorities

- 4.1 This report supports the Council's Corporate Priorities as follows:
 - (i) Adhering to the Complaint Handling Code will assist Housing Services in dealing with complaints and help achieve the Council's 'Responsible Council' priority by delivering Council services that are customer centred and accessible - giving choice to our customers in how they access our services - and to be accountable for our actions.

5. Report Detail

Background

- 5.1 Cabinet considered the [previous year's Complaints Performance and Service Improvement report](#) at their 12 June 2024 meeting, this report contains the detailed background and purpose of the report.
- 5.2 The Housing Ombudsman requires Landlords to produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include the annual self-assessment against the Complaint Handling Code to ensure their complaint handling policy remains in line with its requirements.

The Annual Complaints Performance and Service Improvement Report

- 5.3 The annual complaints performance and service improvement report must include the following:
 - a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.**
This is provided as Appendix 1, also see paragraphs 5.43 and 5.45.
 - b. 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 paragraphs 5.4 - 5.31 below
 - c. any findings of non-compliance with this Code by the Ombudsman;**
The Council was **not** subject to any findings of non-compliance by the Ombudsman.
 - d. the service improvements made as a result of the learning from complaints;**
See paragraphs 5.32 - 5.37 below

e. any annual report about the landlord's performance from the Ombudsman;

The Council was **not** subject to any reports about its performance from the Ombudsman.

The Ombudsman's latest landlord performance reports are for landlords with five or more findings made in cases determined between 1st April 2023 and 31st March 2024.

The Council didn't have any cases determined by the Housing Ombudsman in 2024/25. (See paragraphs 5.35 - 5.36 for more detail)

f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

The Council was **not** subject to any other reports from the Ombudsman specifically regarding its own work or services.

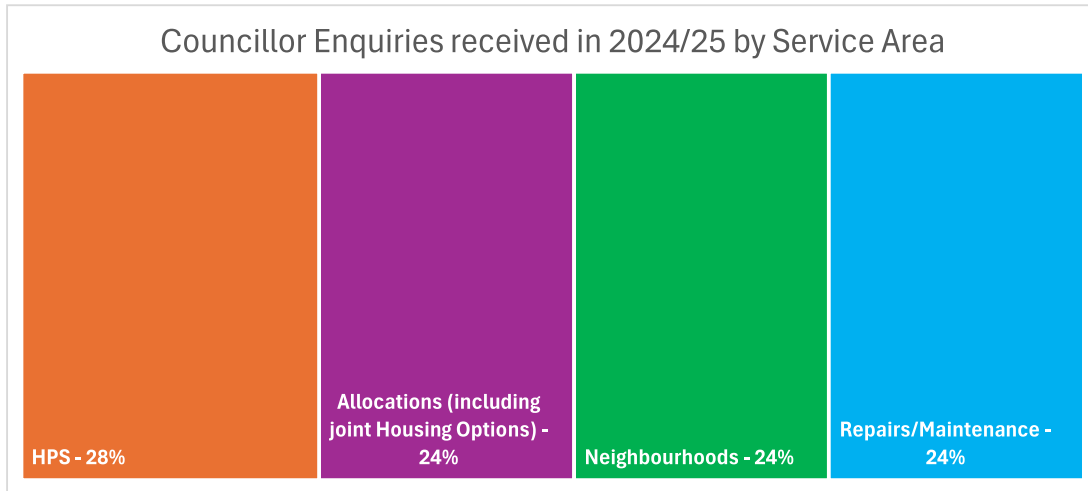
The Ombudsman produces a large number of reports throughout the year, available on their [website](#). These include Spotlight reports that look at thematic issues to special investigations into specific landlords' failings and quarterly Insight and Complaint Handling Failure Order reports. These reports are regularly digested by officers and any learning noted and implemented where possible, see paragraphs 5.38 - 5.42 below.

Complaints Analysis

- 5.4 The Service Improvement Team administer Housing Services' complaints and service requests that get directed to the service. The team use a dedicated email account housingformalenquiries@cannockchasedc.gov.uk and maintain a register of all complaints and enquiries received. All formal complaints are directed through this inbox via the CEO office and their dedicated email account ceoformalenquiries@cannockchasedc.gov.uk.
- 5.5 The team logged a total of 294 enquiries and complaint contacts during 2024/25, with 45 Stage One complaints and 7 Stage Two complaints, the remainder being Councillor enquiries, MP enquiries, and Service Requests (or informal resolutions), this doesn't include a large number of other enquiries that go directly through managers, team leaders and other officers.
- 5.6 These Councillor enquiries, MP enquiries, and Service Requests were all considered 'informal resolutions' in accordance with the Corporate Complaints Procedure and the Complaint Handling Code, they are generally first-time enquiries or where the service hadn't had opportunity to respond where an issue had arisen or it was a query over the service provision or delivery.
- 5.7 There were 25 Councillor enquiries received throughout 2024/25, with the majority being received for Housing Property Services (HPS), yet only by a small margin. HPS received 28% of total Councillor enquiries, which was 7 enquiries. However, Allocations, Neighbourhoods and Repairs/Maintenance each received 6 Councillor enquiries - accounting for 24% share each.
- 5.8 The majority of HPS Councillor enquiries were requests for works to be considered and undertaken, particularly in relation to lack of parking available within certain neighbourhoods.

5.9 Proportions of Councillor Enquiries received by service area can be seen in the chart below. The most common Councillor enquiries were:

- Updates as to when repairs can be expected.
- Updates on housing applications.
- Reports to Neighbourhoods Team about behaviour of neighbours and condition of properties.

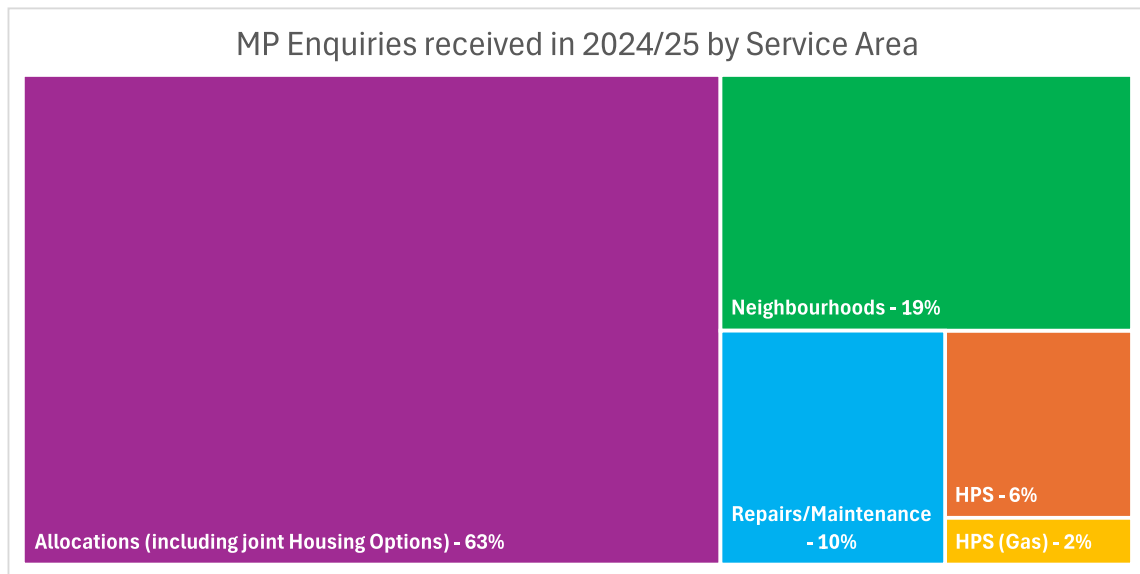


5.10 There were 62 MP Enquiries received throughout 2024/25, of which the Allocations team (including some jointly with Housing Options team on homelessness cases) were the Service Areas to receive the most - they received 39 enquiries which amounts to 63% of total MP Enquiries received. Generally, these enquiries were because applicants required further assistance with their housing application or placing a bid. There were several enquiries which requested a review of existing housing applications, especially regarding banding.

5.11 The chart below shows the proportion of MP Enquiries received between areas within the Housing Service.

Typical MP enquiries included:

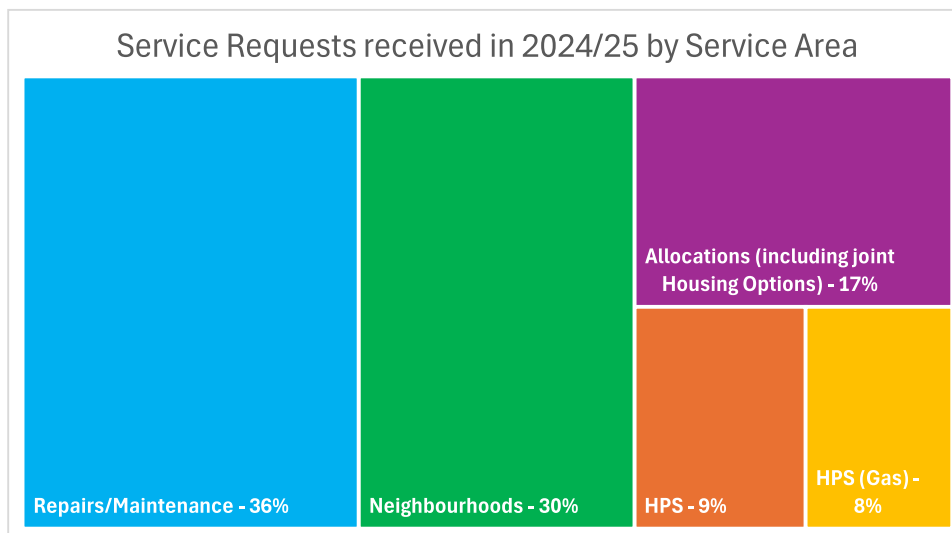
- Tenants unhappy with the timescales they have been given for repairs, especially for fencing
- Damp and mould issues that require investigation
- HPS had a few upgrade requests, queries about poor upgrade works and issues with shared driveways
- Neighbourhoods mostly received complaints about other neighbours - particularly the condition of their property and drug-related behaviour.



5.12 155 Service Requests (informal resolutions) were received during 2024/25. Repairs and Maintenance received 56 requests, giving them the highest percentage of 36%. The Service Area to receive the second highest number was Neighbourhoods, who received 46 requests (30%).

Similar to MP enquiries, typical service requests included:

- Outstanding repairs - the majority being fencing/gates
- Damp and mould issues that need to be addressed
- General assistance required from Allocations Team (inc. jointly with Housing Options) with housing applications and bidding
- Allocations also received several service requests from tenants who were unhappy with decisions made as well as the waiting times for a property
- HPS (Gas) enquiries mainly concerned issues with the boiler and our gas contractor not turning up to appointments
- Complaints to the Neighbourhoods Team again related to the condition of neighbouring properties - particularly their gardens.

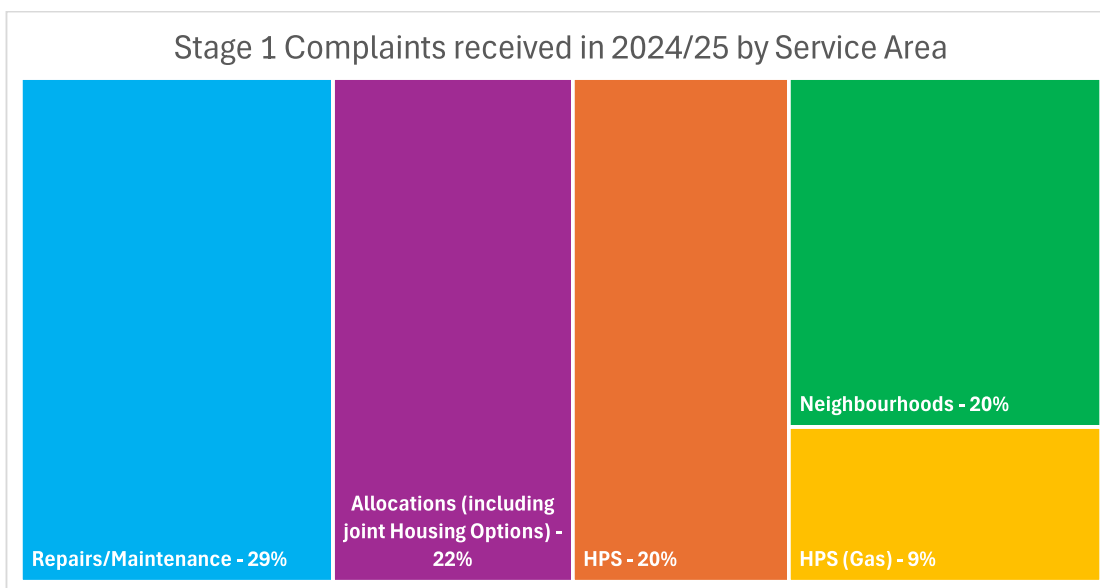


Stage One Complaints

- 5.13 A total of 45 Stage One complaints were received during 2024/25, this is slightly higher than last year's figure, where 36 were received.

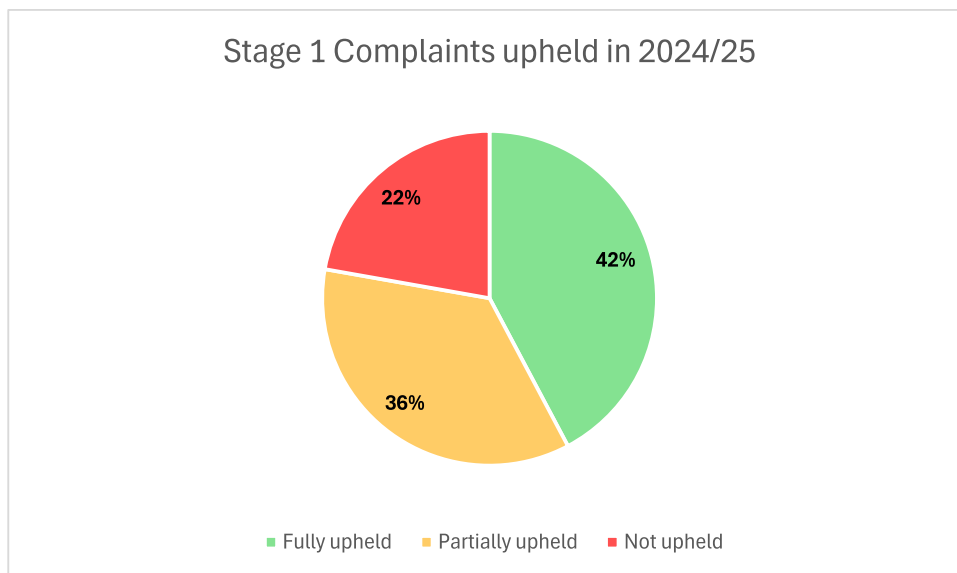
Service Area	Count	Percentage
Repairs/Maintenance	13	29%
Allocations (inc. joint Housing Options)	10	22%
HPS	9	20%
Neighbourhoods	9	20%
HPS (Gas)	4	9%
Total	45	

- 5.14 The majority of Stage One complaints were around property issues with 13 complaints received for Repairs and Maintenance issues and 13 complaints around Housing Property Services. The Tenancy Services section received 19 in total across Allocations (including jointly with Housing Options) and Neighbourhoods teams. The graph below illustrates the proportion received by each housing service area.



- 5.15 When looking further into the main areas of concern for Repairs and Maintenance complaints, nine complaints were based around outstanding repairs at the property - many of which had been outstanding since the tenant moved in. Five Stage 1 Complaints were due to tenants being dissatisfied with the condition of their property, which links very closely to outstanding repairs that have escalated into wider issues.
- 5.16 Allocations received ten Stage 1 Complaints; this included some homelessness cases dealt with by the Housing Options team. The majority of which were based around dissatisfaction with the length of time spent on the housing register and time taken to be allocated a suitable property. A few applicants requested a review of their application and banding due to their medical needs.

- 5.17 HPS and HPS Gas received a combined total of 13 Stage 1 Complaints. HPS Gas' complaints mainly concerned the gas contractor (PH Jones and more recently Sure Maintenance) and outstanding boiler repairs. Unfortunately, several boiler issues remained unresolved with no adequate solution and some tenants were left with no heating or hot water. Four complaints were received for HPS regarding poor kitchen or bathroom upgrades which had been completed by our contractor, Novus.
- 5.18 Neighbourhoods received 9 Stage 1 Complaints, four of which were concerns about neighbouring properties and the condition of their properties and/or communal areas. Two complaints were based around on-going Anti-Social Behaviour issues.
- 5.19 Of the 45 Stage One complaints, eight were escalated from unresolved MP enquiries, Councillor enquiries or service requests, equating to an escalation rate of 18%. Three complaints went right through to Stage Two; however one was not upheld and two were only partially upheld - meaning that the complaints were not fully substantiated.
- 5.20 Four complaints were refused to be considered, this was because they were either a policy decision (three cases) or being unhappy with the length of time waiting for a non-emergency repair (one case - fencing, which was still within our target timescales). The Corporate procedure states that if the complainant just disagrees with a decision of the Council, which has been taken in accordance with our policies and procedures, then this will not be treated as a complaint.
- 5.21 Of the 45 Stage One complaints, 42% of them were upheld fully, 36% were upheld partially, with the remaining 22% not upheld at all.



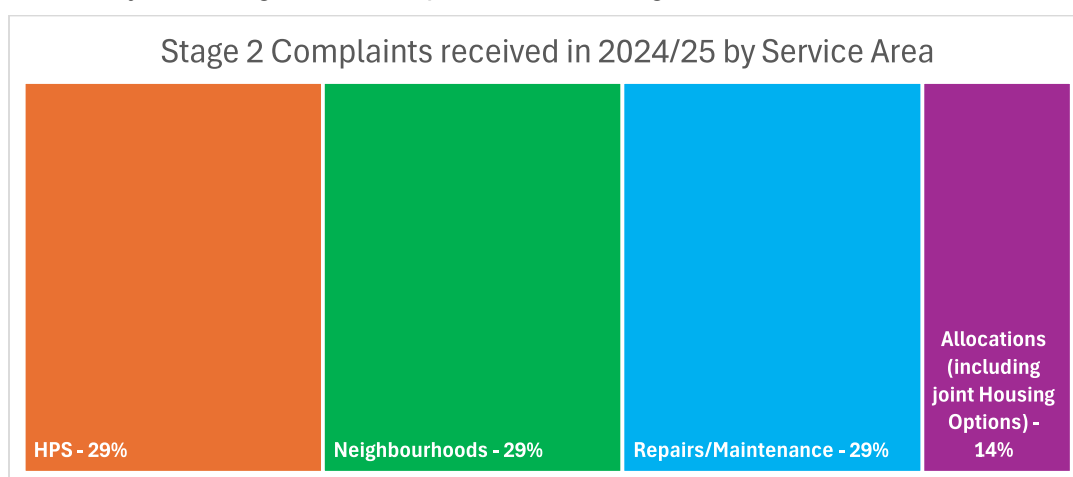
- 5.22 Upon investigation the majority were found to show error or fault from the team, therefore where there is found to be fault the team will own the mistakes, put them right and offer appropriate resolutions to the complainant - and most importantly learn from the issues raised, see paragraphs 5.32 - 5.38 for more detail.

Stage Two Complaints

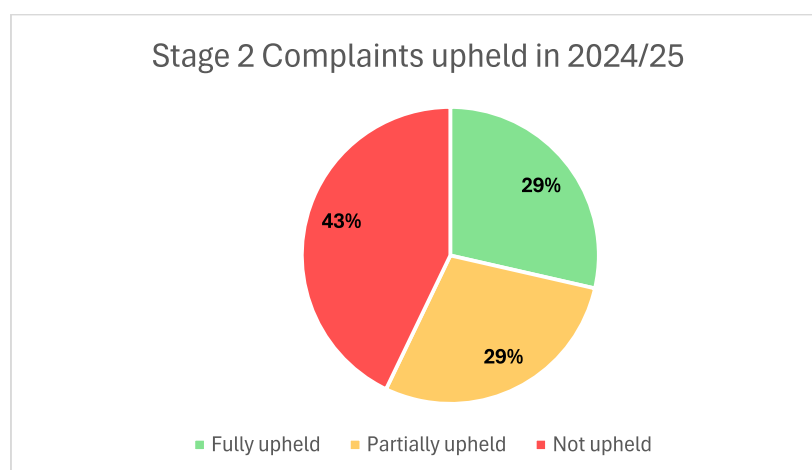
- 5.23 16% of Stage One complaints were escalated up to Stage Two - putting the total number of Stage Two Complaints at seven for the year, which is the same as the number received last year.

Service Area	Count	Percentage
Repairs/Maintenance	2	29%
HPS	2	29%
Neighbourhoods	2	29%
Allocations (inc. joint Housing Options)	1	14%
HPS (Gas)	0	0%
Total	7	

- 5.24 Stage 2 Complaints were distributed fairly evenly between each Service Area. HPS, Neighbourhoods and Repairs/Maintenance each received 2 Stage Two Complaints which equates to 29% each. Allocations and Housing Options received just 1 Stage Two Complaint - amounting to 14%.



- 5.25 When looking at the upholding of Stage Two complaints, the majority were not upheld (43%). However, as previously mentioned, because there were only seven Stage Two Complaints received, there is not much difference in the number of cases that were upheld (2), partially upheld (2) and not upheld (3).

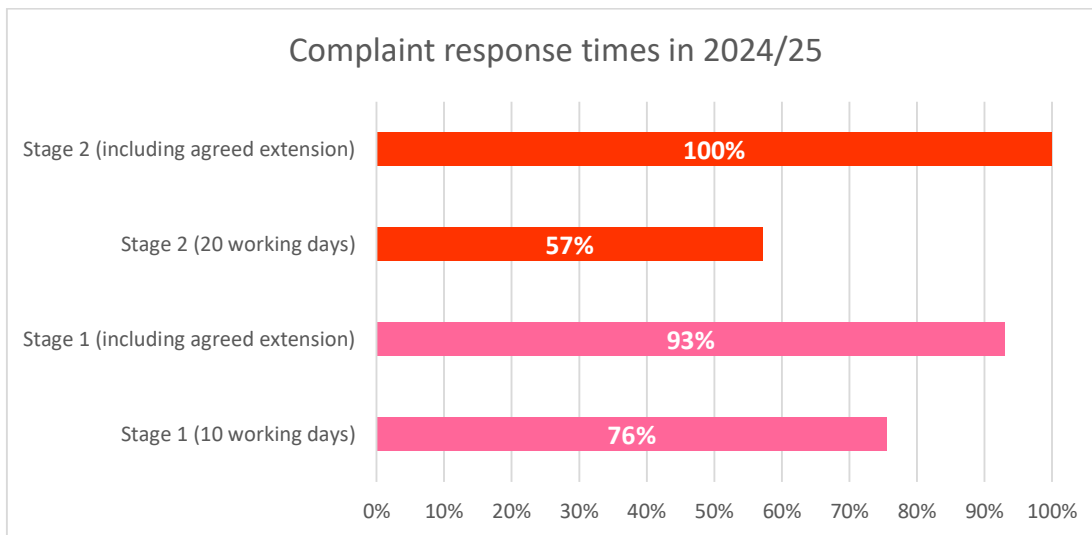


- 5.26 The majority of complainants that escalated their complaint to Stage Two stated they were dissatisfied with the Stage 1 response. A couple of complainants were offered compensation at Stage 1, however escalated to Stage 2 as they were in disagreement with the amount offered.

Further information on how we have learnt from the complaints is covered in paragraphs 5.32 - 5.38.

Response times

- 5.27 34 Stage One complaints were responded to within timescales (10 working days). This amounts to 76% of them being responded to on time. However, when we look further into the data, three of the Stage One complaints had their deadline extended as agreed between the Council and the complainant. Therefore, when factoring in these complaints as being responded to on time (as per an agreed extension allowed by the Complaint Handling Code), the figure rises slightly to 93%.
- 5.28 57% of Stage Two complaints were responded to within 20 working days. This means 4 were responded to within the timescale. Again, an extension of the response due date was agreed for the remaining three complaints, meaning we can count it as being responded to on time. This puts the overall percentage of Stage two complaints responded to on time at 100%.



Tenant Satisfaction Measures (TSMs)

- 5.29 The Regulator of Social Housing (RSH) created the TSMs system for assessing how well social housing landlords in England are doing at providing good quality homes and services. Performance is to be reported to the RSH annually (by the end of June) and will subsequently be published by the RSH in the Autumn of each year.
- 5.30 There are 22 TSMs in total which cover five key themes, one of these themes is Effective Handling of Complaints. There are three tenant satisfaction measures linked to the Effective Handling of Complaints theme which includes:
- CH01: Complaints relative to the size of the landlord, based on the number of complaints the Housing service receives for each 1,000 homes of the relevant stock type. This is recorded by the Service Improvement Team.

- CH02: Complaints responded to within Complaint Handling Code timescales, based on the percentage of complaints the Housing service responds to within the timeframes set by the Housing Ombudsman's Complaint Handling Code. This is recorded by the Service Improvement Team.
- TP09: Satisfaction with the landlord's approach to handling complaints, measured by a tenant perception survey and will be based on the percentage of tenants who say they are satisfied with the approach to handling complaints. This was obtained by the TSM perception survey carried out in Summer 2024, and has already been reported to tenants through our newsletter and on our [website](#).

5.31 The performance to be reported to the Regulator will be as follows:

CH01: Complaints relative to the size of the landlord	
Stage one complaints received per 1,000 homes during the reporting year:	8.98
Stage two complaints received per 1,000 homes during the reporting year:	1.40
<p><i>Commentary: This is an increase on last year, where 7.15 stage 1 complaints were received per 1,000 homes. Stage 2 complaints received were at a similar level last year, 1.39 per 1,000 homes.</i></p> <p><i>This would appear low in comparison to the sector, the 23/24 national results found that the average number of complaints received per 1,000 homes was 42.5 at Stage 1 and 5.7 at Stage 2.</i></p> <p><i>We are following the Corporate Complaints Procedure and the Complaint Handling Code, identifying service requests and informal resolutions correctly in accordance with both. Other housing providers may interpret more service requests/informal resolutions as formal complaints.</i></p>	
CH02: Complaints responded to within Complaint Handling Code timescales	
Proportion of Stage one complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales (10 days):	93%
Proportion of Stage two complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales (20 days):	100%
<p><i>Commentary: 42 out of 45 (93%) Stage 1 complaints were responded to within timescale, those complaints outside of the 10 working days and without an agreed extension of time were complex and only missed the timeframe by a matter of a day or two. This is an increase from last year at 83%.</i></p> <p><i>In comparison, 82.3% was the average for all providers in 23/24, so we are exceeding the average performance from last year.</i></p> <p><i>All 7 (100%) Stage 2 complaints were responded to within 20 working days. This maintained the 100% level from last year.</i></p> <p><i>The national average in 23/24 was 83.6% for the sector, so we are performing well into the upper quartile of providers.</i></p>	

TP09: Satisfaction with the landlord's approach to handling complaints: 49%

Commentary: Whilst 49% may appear low, this is an increase on last year (at 41.5%) and in comparison, to other housing providers it is relatively good. The average score for this indicator in 23/24 for all providers was 34.5%, therefore we are comfortably in the upper quartile of all providers on this indicator.

As per the previous year, when looking at the data from the TSM perception survey a large number of tenants who responded to the question about complaint handling hadn't submitted a formal complaint - the numbers were vastly different. A number of these 'complaints' will have been from MP enquiries or Informal Resolutions where the complainant may believe they have submitted a formal complaint but actually have not.

It is a contentious area as those responding could have a negative perception of the approach to our handling of the complaint if they did not achieve the outcome they wanted, whilst we always try to achieve outcomes for complainants it is not always possible.

We intend to introduce complaint handling satisfaction surveys for 2025/26 and will monitor and analyse the findings to identify any improvements than can be made.

Learning from complaints

- 5.32 In both our regular [tenant newsletters](#) and the [Annual Report to Tenants](#) we have reported upon our learning from complaints, therefore previous years' have been published.
- 5.33 A learning from complaints form is completed by the responding manager shortly after each stage 1 complaint, or if escalated after the stage 2 response is completed. It allows the service to quickly put something right - either a policy or procedure change, or act quickly to implement any staff training, to ensure that no other tenant or resident has to go through the same experience and improve our services to them.
- 5.34 Not all complaints produce learning points; however, a selection of cases and improvements made from complaints received in 2024/25 are included in the following table.

Complaint outline (reasons etc.)	Our response	Learning implemented
A complaint from a leaseholder about the communication around service charges and programmed improvement works.	Complaint was partially upheld as there was found to be a lack of clarity and information provided around service charges. Communication around planned improvement works was also lacking.	We have improved our welcome information pack for leaseholders to include more clear guidance on service charges and, where known, details of upcoming planned works to the block.

Complaint outline (reasons etc.)	Our response	Learning implemented
<p>A complaint was received as a mutual exchange decision had not been made in a timely manner due to delays in the property inspection.</p>	<p>Complaint was upheld.</p> <p>Communication internally (within the Repairs team and between Repairs and Allocations) and with the applicant about the inspection process and the progress of the exchange more widely was poor and lacking.</p> <p>The Mutual Exchange process needs to be firmer in relation to the inspection process; the final decision timeline being achieved (or reasons for it being delayed where outside our control).</p> <p>Communication with tenants/applicants should improve around the process and more regular updates of the progress made.</p>	<p>We revised and agreed a new mutual exchange inspection process and incorporated in revised process documents.</p> <p>The Mutual Exchange Policy is also being updated to reflect all the changes.</p> <p>Conversations have been had with officers (at team meetings and toolbox talks) to ensure communication with applicants is more effective and timelier. The revised process incorporates more regular updates being made to the tenant/applicant.</p>
<p>Complaint received following an application being cancelled after the applicant did not provide a full list of proofs required. Complainant also believed we had not processed the application in line with our policy due to the length of time taken.</p> <p>Issue was that we had not explained this clearly, so it was unclear what was required. Also, this case was not escalated for internal review despite appearing several times at the Children's OT case meeting as not having been progressed.</p>	<p>Complaint was upheld.</p> <p>Whilst the application was processed within the terms of our allocations policy, we fell short of the customer service we would aim to provide and that the Allocations service is simple, easy to understand, transparent, open, and fair.</p>	<p>Process changed for OT cases. Where raised at 2nd time on agenda officer will check progress, on 3rd time on agenda where application not being progressed, case will be raised to Team Leader / Assistant Manager to review.</p> <p>Letter template was revised to be much clearer on the request of missing information and the consequence of information not being received (i.e. application closure).</p> <p>Notes on the Information Management System are to provide more detail, Officers reminded of the need for detailed case notes.</p> <p>Ongoing sample checks by the Assistant Manager will be made to ensure being complied with.</p>

Complaint outline (reasons etc.)	Our response	Learning implemented
<p>Complainant felt applicant was unfairly and unequally treated (compared to others) throughout period after transfer application, but especially after the applicant's pregnancy and subsequent decisions about her bedroom entitlement and a withdrawn nomination by a housing association.</p>	<p>Complaint was partly upheld as the service did fall short of what should be expected, despite the application being treated in line with policy.</p> <p>The NEC housing management system did not permit recognition of unborn children at 24 weeks - it applies 6 months (26 weeks), meaning it needed to be manually overridden to correct the bedroom entitlement for the applicant.</p>	<p>A procedure review was undertaken for such cases of existing high housing need, as they require individual review when a pregnancy affects the potential bedroom eligibility.</p> <p>Communication with and to affected customers needed careful consideration and to be effective.</p> <p>Officers to seek clarification related to eligibility elements of policy (and delegated authority) from Team Leader/Assistant Manager.</p> <p>Case review trigger guidance has been updated.</p> <p>All key decisions to be confirmed in writing with applicant/tenant, with clarity following new information or key conversations.</p> <p>Revised customer letters considered as part of procedure review.</p>
<p>Complaint submitted by tenant following multiple visits taken to rectify a fault with their central heating system.</p> <p>Contractor had on several occasions failed to communicate with the tenant where they were unable to attend due to staff absences and low engineer levels.</p>	<p>Complaint was upheld due to service delivery failure of contractor.</p>	<p>Housing Property Services (HPS) team requested that contractor processes were changed, so that if appointments needed to be rearranged contact is made before 10am for AM appointments or 3pm for PM appointments, to keep tenants informed.</p> <p>Periodic review to be undertaken by HPS Building Safety Team</p>

Complaint outline (reasons etc.)	Our response	Learning implemented
<p>A complaint about rubbish being dumped in drying area and brown bin overspill at flat block. Also, the time taken to repair blocked guttering and with communication of the appointment for a stock condition survey.</p>	<p>Complaint was upheld. Communication error between departments - Repairs should have been actioned sooner (resulted from a NEC system issue). Contractor left a contact card but did not get back in contact. Tenant had to chase this up via HPS and then tenant had to contact the contractor directly. Neighbourhoods conducted an estate inspection and did not action the rubbish removal. Tenant contacted the Neighbourhoods Team twice via email and nothing had been done.</p>	<p>Rubbish removal procedure reinforced with officers, and a new contract taken out with waste company. Communication issue with contractor resolved following contract management meetings. The repairs scheduler part of the NEC system is being reviewed, and a new solution is being sought - further detail below.</p>
<p>Several complaints about repairs service, including:</p> <ul style="list-style-type: none"> • A Housing Maintenance Operative carrying out a repair on a front window while tenant was not at the property, which was also the wrong address; and the length of time it had taken to complete a previous lounge window repair. • An unresolved damp issue on-going since 2023. Tenant had not been kept updated on the progress of the repair, and calls have not been answered. • Unresolved roof leaks and lack of communication. • Another unresolved roof leak of a complex nature, issue further worsened by poor communication. 	<p>All upheld, mainly as a result of the current NEC housing information management system causing errors and delays, data was lost, and information was not passing sufficiently between teams and operatives.</p>	<p>Procurement of a new software solution will begin subject to Cabinet/budget approval. It is required to better schedule and distribute work orders to operatives, which will avoid these types of errors, loss of data/bookings, delays and ensure repairs are completed right first time. Tool Box Talks to the trade teams to advise them to be more thorough when viewing repairs through their PDA to make sure they have the right property. More ownership within the Repairs team - Management and Trade to make sure that repairs are being carried out to the good standard required and a right first-time approach, combined with a more customer orientated communication focus.</p>

Summary

Communication was at the centre of a number of the complaints and learning from; therefore, this is an area that further attention needs to be paid to. Customer Service training will be revisited for the service, as well as undertaking some mystery shopping exercises and tenant engagement activities to review communication with customers. Hopefully, we can reduce overall complaint numbers in 25/26 and/or communication being a contributing reason to those complaints.

- 5.35 We have recorded a total of five complaints being escalated to the Housing Ombudsman or the Local Government and Social Care Ombudsman (LGO) during 2024/25, but no full determinations have been made.
- 5.36 Three complaints were decided not to be investigated further by the LGO due to there not being enough evidence of Council fault to justify Ombudsman involvement. The other two we are informed have been triaged for investigation by the Housing Ombudsman. Therefore, we have not received any full determinations from the Ombudsman during 2024/25, so no learning received from them can be detailed in this report.
- 5.37 We have found there is currently a significant waiting time for the Housing Ombudsman to provide determination decisions, around 6 months from the complainant's submission to them, so there is a time lag in complete complaint determinations going through to the Ombudsman. There can also be a delay in the complainant taking a complaint to the Ombudsman following our final Stage 2 response, further adding to the period of time.

Learning from reports or publications produced by the Ombudsman in relation to the work of the landlord.

- 5.38 The Housing Ombudsman issued a Spotlight report on attitudes, respect, and rights – relationship of equals in January 2024. Whilst over 18 months ago it was not covered in the previous report, and we would like to draw attention to the learning we have taken. The report made several recommendations for complaint handling, which have been addressed in the table below:

Recommendation	Action / Response
Raise awareness of the complaints procedure and ensure it is accessible for residents who may face barriers to raising a complaint, as required by the Complaint Handling Code.	Complaint procedure is easily accessible online, and staff know to signpost to this. Staff would assist those who may face barriers or are unable to raise a complaint.
Ensure the complaints policy permits complaints about staff conduct, attitudes and approach.	Corporate procedure allows complaints about staff conduct, their attitudes and approach.
Establish and enforce a clear process for how complaints about bullying / discrimination will be investigated.	As above, Corporate procedure allows for such complaints, and they are investigated in line with the procedure and complaint handling code. An 'independent' complaint handler would investigate for complaints within the same team/section.

Recommendation	Action / Response
Contact restriction policies must set out clear timescales, review, and appeals process. Where there is single point of contact, this should be applied consistently.	The 'Unreasonably Persistent and/or vexatious complaints and unreasonable behaviour' section of the Corporate procedure deals with this matter.
Calls to be recorded, either a physical recording or a contemporaneous telephone record.	<p>Housing Services will be moving onto the NetCall system where calls can be recorded when logged into the system. Meetings held virtually can be recorded i.e. on Microsoft Teams or Zoom.</p> <p>For complaints, notes from telephone calls at Stage 1 would be taken by the complaint handler and could be provided on request to the complainant. At stage 2, an in-person meeting is usually held, and this can be recorded on request. If virtual, the meeting could be recorded with the complainant's agreement.</p>
<p>Landlords need to ensure:</p> <ul style="list-style-type: none"> • they provide clear explanations. • repeat information where needed, including in different formats. • offer face-to-face contact as much as possible and a named point of contact. • investigate concerns and share the outcome. • recognise when things have gone wrong, apologise and explain how these will be addressed; and • know when to make appropriate referrals to agencies and whom to signpost to. <p>Underpinning all of these should be a baseline of empathy and respect.</p>	<p>The current Housing Services procedure, alongside the Corporate procedure and adherence with the Complaint Handling Code will meet these requirements and ensure that we show empathy and respect. Clear explanations are made in responses and any communication.</p> <p>If different formats of information are needed, they will be provided.</p> <p>Complainants are offered face to face meetings at both stage 1 and 2. The complaint handler will make themselves known via phone call at stage 1 and the complainant is informed the Head of Service will investigate the stage 2 and meet face to face with them.</p> <p>We recognise when things have gone wrong, apologise and explain how they will be addressed. We have a HRA Compensation Policy which provides a guideline on offering appropriate resolutions. Where appropriate referrals are required to other agencies, we are proactive in signposting and linking up complainant and partner agency.</p>
Ensure disability or language needs are routinely considered as part of the complaints process and that extra accessibility support, or accessible materials, are offered where appropriate.	Support and reasonable adjustments would be made where appropriate and required.

Recommendation	Action / Response
Identify where more specific training, guidance or support is needed to fulfil complaint handling roles.	Assistant Housing Services Manager has undertaken several of the training and information sessions put on by the Housing Ombudsman and also available through their online 'learning hub.'
Maintain accurate records of residents' vulnerabilities and individual circumstances.	<p>NEC Housing Information Management System allows for the recording of tenant vulnerabilities and circumstances. Non-tenant complainants' details are recorded, if disclosed and permitted, as part of the complaint handling.</p> <p>Housing Services will be undertaking a tenant profiling exercise to capture this information as a census and then going forward through housing applications.</p>
Use mandatory checks, such as annual boiler checks, as a 'touchpoint' opportunity to undertake welfare checks with residents.	<p>Annual gas servicing undertaken by contractor, so not straightforward for them to perform welfare checks. They will be trained by their organisation to be able to identify any issues that would need reporting.</p> <p>All Contractors are made aware of our safeguarding procedures and the issuing of concern cards back to us if they have concerns about a tenant's welfare. All repairs operatives follow similar arrangements and will report any concerns they see with the concern cards. These reports are then followed up by the Tenancy Services team.</p> <p>Tenancy Services staff undertaking visits will complete a Vulnerability Profile Form to update tenant details on the NEC system and ensure support and referrals are put in place.</p> <p>An internal Vulnerability Policy and Procedure are in place and adhered to.</p>

5.39 In late May 2025 the Housing Ombudsman issued its latest Spotlight report on [repairs and maintenance – repairing trust](#). The report highlights the need to modernise maintenance operations and end poor practices, such as denying access to necessary repairs. Trust remains essential among landlords, residents, and contractors. The headline recommendations for landlords were as follows:

- i. Cultural shift: The report advocates for a cultural transformation within the sector, calling for empathetic communication and transparency. Landlords should treat residents as individuals deserving of a safe home. Language plays a key role, including avoiding impersonal language such as 'stock' and 'decants' when speaking to residents. Human-centred services that treat residents with respect and dignity is recommended.

- ii. Predictive maintenance models: Transitioning from reactive to predictive maintenance models can greatly enhance efficiency and service quality. By anticipating issues before they escalate, landlords can provide more timely and effective repairs.
 - iii. Strengthening relationships: Modernising and improving relationship management with both contractors and residents. Stronger partnerships will lead to better communication, quicker resolutions, and a more satisfactory experience for all parties involved.
 - iv. Code of conduct: Creating and promoting a Code of Conduct for all staff and contractors entering residents' homes. This code would set clear expectations for behaviour and communication, further building trust and accountability.
- 5.40 The Repairs spotlight report needs to be digested further, and individual recommendations considered for implementation. The Complaints Performance report for 25/26 will report on the recommendations in more detail, the learning we have taken from it and progress upon delivering the actions (if not already implemented).
- 5.41 In 2024/25 the Housing Ombudsman also issued a couple of Insight reports on Shared Ownership and Greater London, whilst both were not directly relevant for the Council they were digested but no major learning points were possible to take from these.
- 5.42 When issued (only one in 24/25), the Housing Ombudsman's Quarterly complaint handling reports are also considered to help improve and create a positive complaint handling culture.

The Self-Assessment 2025/26

- 5.43 As detailed above, the Complaint Handling Code requires landlords to undertake a self-assessment against the requirements set out. The self-assessment form is attached as Appendix 1.
- 5.44 For the most part the Council's corporate Customer Feedback and Complaints Procedure already makes provision for the majority of requirements set out by the Code. For the remainder the Housing Services team interpret the Code and act in accordance with it.
- 5.45 As the Code contains a number of requirements and we believe these are being met as part of the existing corporate procedure and Housing Services procedures, the following table will just detail the requirements that were not being fully met in 23/24 and how Housing Services has addressed them.

Code Reference	Requirement	Reasons not met	How we have addressed
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff, and relevant committees.	<p>Learning from complaints is not reported on corporately across the Council.</p> <p>Housing Services have reported their learning from complaints to tenants via the Annual Report and regular newsletters, but not directly to any members via committee(s).</p> <p>The Annual Report is submitted to Cabinet, so the committee has had some sight of learning from complaints for Housing.</p>	<p>We have formed a new Housing Board to oversee Housing Services, and learning from complaints will be reported to this Board.</p> <p>Any recommendations will be noted in the minutes, which are then received by Cabinet.</p>
9.6	The Member Responsible for Complaints (MRC) will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	New requirement last year and we hadn't formalised the approach.	The Housing and Corporate Assets Portfolio Holder has now been established as the MRC. Quarterly meetings are held with the MRC, Head of Housing and Corporate Assets and the Assistant Housing Services Manager to provide the information in 9.7 below.
9.7	<p>As a minimum, the MRC, and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories, and outcomes of complaints, alongside complaint handling performance. b. regular reviews of issues and trends arising from complaint handling. 	New requirement last year and we hadn't formalised the approach.	<p>See above.</p> <p>The MRC is now provided this information at quarterly meetings and will have first sight of the annual complaints performance and service improvement report.</p>

Code Reference	Requirement	Reasons not met	How we have addressed
	c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.		

6 Implications

6.1 Financial

The increase in complaints may result in an increase in compensation payments being made in order to resolve complaints appropriately. Costs arising from increased compensation payments are anticipated to be met from within existing budget.

6.2 Legal

As detailed within the report, the Housing Ombudsman's Complaint Handling Code became statutory on 1 April 2024. All members of the Housing Ombudsman Scheme are obliged by law to follow its requirements. The Housing Ombudsman has a legal duty to ensure landlords complaint procedures and responses are compliant with the Code. The Code requires landlords to self-assess and submit an annual submission of their performance against the Code.

Failure to comply with a requirement of the Code will result in Ombudsman intervention to gain compliance. Repeated or ongoing failures can result in a Complaint Handling Failure Order and subsequent referral to the Regulator for Social Housing. It is therefore essential that the Council ensures compliance.

6.3 Human Resources

None.

6.4 Risk Management

There is a risk of reputational damage to the Council if Complaints received are not handled in a timely manner and investigated thoroughly. Escalation to the Housing Ombudsman may result in the Council being fined and receiving negative publicity.

6.5 Equalities and Diversity

None.

6.6 Health

None.

6.7 Climate Change

None.

7 Appendices

Appendix 1: Self-Assessment Form 2025/26

8 Previous Consideration

Cabinet - 28 January 2021

Cabinet - 12 October 2023

Cabinet - 12 June 2024

9 Background Papers

None.

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Ward Interest: N/A

Report Track: Cabinet: 31/07/25

Key Decision: No