

<b>Report to:</b>	Customer Committee	<b>Agenda Item No:</b>	10
		<b>Date of meeting:</b>	14 May 2024
<b>Report of:</b>	Executive Director – Resources	<b>Purpose:</b>	<input type="checkbox"/> Decision <input checked="" type="checkbox"/> Note <input checked="" type="checkbox"/> Discussion
<b>Title:</b>	Complaints Annual Performance Report 2023 / 2024		

## 1. Executive Summary

- 1.1 This report presents the complaints annual performance for the 2023/2024 financial year. The report also provides the self-assessment against the Housing Ombudsman Service’s (HOS) Complaint Handling Code 2022.
- 1.2 The report is for the Committee to note, and following consideration and challenge, the report will be presented to Board on the 23 May 2024, including comments from the Committee.
- 1.3 As reflected in this report, performance in the 2023 / 2024 financial year was good. Whilst there was again an increase in the number of complaints received in 2023 / 2024 (272) when compared to 2022 / 2023 (254) and 2021 / 2022 (206), the number remains relatively low and represents upper quartile performance against the benchmark. Table 2 in the report provides a summary of the numbers of complaints received by stage and whether the complaints were upheld, partially upheld, or rejected.
- 1.4 As reported previously to Committee, there was one maladministration and service failure determination from the Ombudsman in 2023 / 2024 in relation to one complaint.
- 1.5 A self-assessment of the HOS Complaints Handling Code 2022 has also been conducted and is included at appendix A to the report. The self-assessment provides positive assurance that the complaints received in 2023 / 2024 were handled in line with the requirements of the Code and that there was full compliance.
- 1.6 Following the implementation of the new HOS Complaints Handling Code from April 2024, there is a separate report on the agenda for Committee to consider and approve a new complaint handling policy and procedure. Following approval, a self-assessment will be completed against the new Code which is due for submission by 30 June 2024. This self-assessment will reflect the implementation of the new complaints policy and procedure.
- 1.7 As part of the roll-out of the new Salesforce Customer Relationship Management System, a new complaints handling system is due to be implemented from June 2024. This will further enhance our handling and reporting of complaints.
- 1.8 Compensation of £23,085.92 was paid in the year to 31 March 2024, of which £17,256.62 related to Stage 1 complaints and £5,829.30 related to Stage 2 complaints.

1.9 The report also provides information around the insight and learning from the complaints received in the year.

## 2. Recommendations

2.1 That the Customer Committee:

- i. considers and challenges the annual complaints performance and learning activity for 2023 / 2024; and
- ii. notes the outcome of the self-assessment, and that WDH was fully compliant with the Housing Ombudsman's Complaint Handling Code 2022 and that the self-assessment will be published on the WDH website, Appendix A.

## 3. Approvals or input already sought

3.1 The Corporate Management Team (CMT) considered and challenged the report at its meeting on 1 May 2024 and approved the report to proceed to the Customer Committee.

## 4. Background Information

### Complaints Performance

4.1 In 2023 / 2024, the number of complaints received has continued to increase, when compared to previous years, as shown in Table 1. These increases can be attributed to changes that have been made to WDH's Complaints Policy, to align with the Housing Ombudsman's Complaint Handling Code. Specifically, the increase between 2021 / 2022 and 2022 / 2023, which relates to the use of a standard definition of a complaint and removal of the informal stage from WDH's Complaints Procedure.

**Table 1 - Number of complaints between 2021 / 2022 and 2023 / 2024**

	2021 / 2022	2022 / 2023	2023 / 2024
Stage 1	175	219	237
Stage 2	31	35	35
<b>Total</b>	<b>206</b>	<b>254</b>	<b>272</b>
<b>% in target</b>	<b>98%</b>	<b>99%</b>	<b>99%</b>

4.2 Despite the increase in the volume of complaints handled in 2023/2024, only three complaints handled at the formal stages, and all at Stage 1, were responded to outside of the timescales set out in the Housing Ombudsman's Complaint Handling Code. At 99%, this is equal to the performance achieved in the 2022 / 2023 financial year which represents very good performance. Whilst it would have been possible for these complaints to be extended, in accordance with the Code, and therefore not go out of target, none of the three complaints escalated to Stage 2, demonstrating that the outcomes at Stage 1 were to the customer's satisfaction.

4.3 Of the complaints received, the largest number were for estate management and for repairs, which is not unexpected given the volume of interactions that these services have with customers. When analysing the category of complaints further, the top three reasons for customers complaining related to:

- Customer care / customer service level.
- Time taken to resolve an issue.
- Damp, mould and condensation.

4.4 Table 2 summarises the outcomes from complaints, analysed by stage for 2023 / 2024. In comparison to the previous year (Table 3), the outcomes for complaints at Stage 1 have remained relatively consistent, demonstrating that we are acknowledging where WDH has done something wrong at the earliest opportunity. This is supported again by a consistent number of complaints being rejected when escalated to Stage 2, which demonstrates that the independent investigation by the Customer Relations team often confirms the Stage 1 decision.

**Table 2 - Complaint outcome by stage 2023 / 2024**

Complaints	Stage 1		Stage2		Ombudsman	
	Total	%	Total	%	Total	%
Upheld	59	25	5	14	1	11
Partially upheld	72	30	16	46	0	
Rejected	87	37	14	40	8	89
Withdrawn	19	8	0	0	0	
<b>Total of all complaints</b>	<b>237</b>	<b>100</b>	<b>35</b>	<b>100</b>	<b>9</b>	<b>100</b>

**Table 3 - Complaint outcome by stage 2022 / 2023**

Complaints	Stage 1		Stage2		Ombudsman	
	Total	%	Total	%	Total	%
Upheld	63	29	9	26	1	17
Partially upheld	71	32	9	26	0	0
Rejected	74	34	17	48	5	83
Withdrawn	11	5	0	0	0	0
<b>Total of all complaints</b>	<b>219</b>	<b>100</b>	<b>35</b>	<b>100</b>	<b>6</b>	<b>100</b>

4.5 During 2023 / 2024, nine requests for information were received from the Housing Ombudsman Service and a further three complaints were referred to them.

- 4.6 There was one maladministration and service failure determination from the Ombudsman in the year to March 2024. These were in relation to the same complaint and WDH did appeal against this decision, as permitted within the Code, and provided information and evidence to support this appeal.

As previously reported to the Committee this determination was in relation to a complaint which was originally handled in 2021. The determination related to three areas; repairs to the home, a complaint about an employee and overall complaint handling. The determination did however praise WDH's customer focused approach to trying to find a resolution to the repairs to accommodate the customer's requests, which included them cancelling eight visits to their home. This is reflected in the positive outcome of their investigation on this part.

WDH wrote to the Ombudsman asking them to reconsider their maladministration on the basis that it appeared they were comparing WDH's approach against the current Complaint Handling Code, not the one that was in place when the complaint was originally handled. A final response from the Housing Ombudsman was received in January 2024 and they have confirmed they do not intend to amend the maladministration judgement.

### Tenant Satisfaction Measures (TSMs)

- 4.7 This year is the first that WDH is required to report performance against these measures. There are four TSMs relating to complaints, and performance against these measures is shown in Table 4 below.

**Table 4 - Tenant Satisfaction Measures 2023 / 2024**

TSM	WDH Target	Output	Housemark*
CH01 – Number of Stage 1 complaints received per 1,000 properties.	6.45	7.49	Upper – 17.6
			Median – 26.14
			Lower – 33.25
CH01 - Number of Stage 2 complaints received per 1,000 properties.	0.94	1.28	Upper – 0.55
			Median – 2.05
			Lower – 4.32
CH02 – Percentage of Stage 1 complaints responded to within the HOS Complaint Handling Code timescales.	100%	98.7%	Upper – 85.1%
			Median – 82%
			Lower – 72.2%
CH02 – Percentage of Stage 2 complaints responded to within the HOS Complaint Handling Code timescales.	100%	100%	Upper – 81.5%
			Median – 77%
			Lower – 63.2 %

- 4.8 There are three measures that have achieved upper quartile performance against our peers through benchmarking our performance with Housemark and one median quartile. One of the TSM measures was achieved within our approved internal corporate performance framework with three not achieving the targets.

## Learning from Complaints

4.9 All complaints are seen as a learning opportunity and efforts are made to ensure that this learning is captured and implemented, to prevent similar complaints arising in the future. Every quarter, each complaint that has identified a learning outcome is set out as part of a report that is presented to the Customer Committee. This learning is then included on an action plan that is monitored through to completion at each meeting. A summary of the learning that has been identified during 2023 / 2024 is set out below.

4.10 Reviews of the following were instigated:

- **Review of record keeping processes and practices for capital improvement works.** There was a need to ensure all communications with customers undergoing planned works is documented and filed appropriately.
- **Review of quality assurance process for work outsourced to third party contractors.** Considerations of how WDH quality assures the work being delivered by contractors to ensure it meets the expected standards and how these checks are recorded.
- **Review of Void Management Procedure is required to determine if this is still fit for purpose.** This followed several Homesearch complaints concerning the standard of let properties.

4.11 The need for the following was identified:

- **Introduction of a process for decanting tenants from their homes while repairs or improvements are undertaken.** The process helps to ensure a single point of contact for customers before, during and after completion of works, who can provide timely and relevant information and updates, and raise any issues or concerns the customer may have about the process or the completed works.
- **Process for informing customers of their change of energy supplier after moving to a use and occupation tenure.** This process ensures that customers are aware of the change of supplier after energy angels have cleared the meters which then automatically appoints OVO as their energy supplier.

4.12 The following actions have also been taken:

- **Amendments to name change form** – the form required changing to include details of a return address, ensuring that tenants have the required information to enable them to return the required form easily.
- **Instructions given to employees for use of the Noise App** – changes were required to the instructions given to employees to ensure tenants are given the correct information and terminology to enable them to set up an account on the App. This will improve tenant access to the Noise App for recording noise related antisocial behaviour and support an improved tenant experience of the process.

- **Information on clearing gutters** – the website has been updated to reflect the repairs policy and procedure for the responsibilities of clearing gutters. This is the responsibility of WDH and this has been made clear on the website.

4.14 Customers can raise enquiries through third parties outside of the complaints process. During 2023 / 2024, 734 MP enquiries were received, all were completed within target. In addition, 521 councillor enquires were also received, 519 of these were responded to in target.

### **Housing Ombudsman’s Complaint Handling Code**

4.15 An updated self-assessment against the Housing Ombudsman’s Complaint Handling Code 2022 has been conducted to demonstrate full compliance with the code. This will be published on the WDH website. The self-assessment can be found in appendix A.

4.16 The Housing Ombudsman Complaint Handling Code has been updated and is now a statutory document. The new HOS Complaints Handling Code came into effect on 1 April 2024 with a self-assessment against the Code due for submission by 30 June 2024. Reflecting the requirements of the new Code there is a separate report on the agenda which seeks Committee’s approval for a new policy and procedure. In addition, compliance with the HOS Code and the new Policy and Procedure will be further strengthened through the implementation of a new Complaint Handling System within the wider Salesforce Customer Relationship Management system, which is due to go live from June 2024.

4.17 As part of the code WDH must have a Member Responsible for Complaints (MRC) which Claire King, Chair of the Customer Committee has been appointed to and the role and responsibilities have been added to WDH’s Standing Orders. Neil Warren, Executive Director of Resources is our executive lead.

4.18 It should be noted that if a landlord does not meet the requirements in any areas and does not move into compliance within a reasonable timescale, the Ombudsman will issue a Complaint Handling Failure Order (CHFO)

## **5. Corporate Implications**

### **5.1 Finance**

Do the recommendations have a one-off cost or are these ongoing?	Not applicable.
Are the costs funded from existing resources or an increase in costs?	Within existing resources.
Has a budget been allocated for the costs of the recommendations?	Within existing resources.
Has the Director of Finance approved all financial implications of the recommendations?	Not applicable.

## 5.2 **Value for Money**

The delivery of the activity contained within this report is designed to support WDH in the continuous improvement of its services, which also considers value for money.

## 5.3 **Procurement Process**

None.

## 5.4 **Employee Resourcing**

None.

## 5.5 **Consultation**

### **Internal**

The CMT receive weekly reports on complaints, and monthly performance are presented to Performance, Scrutiny and Challenge (PSC) meetings.

### **External**

Best practice information on complaint handling from the Housing Ombudsman Service (HOS) is considered as part of WDH's approach strategic learning and continuous improvement.

## 5.6 **Customer Impact**

The learning from these reports enables WDH to ensure that our customers shape services and their feedback is turned into action.

## 5.7 **Sustainability**

None.

## 5.8 **Risk and Assurance**

Relates primarily to risk CS1 which relates to consumer regulation and ensuring that we obtain and learn from customer feedback. The Board's stated risk appetite for this risk, and Consumer Regulation / Housing Ombudsman compliance, is risk averse.

## 5.9 **Data Protection and Information Security**

None.

## 5.10 **Health and Safety**

None.

## 5.11 Strategic Objectives and Priorities

This report will contribute to WDH delivering the following objectives:

### **Strategic Objective Reference 1:**

#### **To be a landlord of choice by putting the customer first.**

##### Customer Excellence

- Improve the customer experience and access to our services through delivery of the WDH brand and an enhanced digital service offer.
- Use customer insight to facilitate improvements to the customer experience.
- Improve our approach to tenant engagement, involvement, and scrutiny of service delivery.

### **Strategic Objective Reference 4:**

#### **To be a well-managed and well governed business**

##### Business of the Future

- Ensure high standards of governance to meet regulatory standards and maintain our G1 status.
- Ensure high standards of financial stewardship to meet regulatory standards and maintain our compliant Viability regulatory status.

## 5.12 Regulatory Compliance

Failure to have an efficient and effective complaints process leaves the business at risk of not complying with the regulatory framework.

The challenge that this report provides demonstrates that the business listens to and acts on customers' views and feedback to improve services.

### **Economic Standards**

Governance and Financial Viability Standard 2015.

### **Consumer Standards**

Tenant Involvement and Empowerment Standard 2017.

## 5.13 Diversity and Inclusion

WDH's equality, diversity and inclusion policies are followed in the handling of all complaints.

Customer satisfaction monitoring arrangements consider the experiences of all customers who access the Complaints Procedure. This will enable the identification of customer groups where further analysis may be required.

## 5.14 Others

None.

## 5.15 Expected Outcome

That by learning from issues arising from complaints services will improve, issues of a similar nature will not occur again in the future and WDH will continuously improve services to tenants.

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### Background Papers

Operational Committee – 18 May 2023

Review of Complaints Policy and Housing Ombudsman’s Complaint Handling Code  
Self-Assessment, Board – 22 September 2022

Housing Ombudsman’s Complaint Handling Code, HOS – March 2022

Housing Ombudsman Complaint Handling Code, HOS – 2024

Customer Insight Report – 16 November 2023

Customer Insight Report – 14 February 2024

Customer Insight Report – 14 May 2024