

# **Report of the Housing Ombudsman's Independent Reviewer of Service Complaints**

For the period from 1 October 2024 to 31 March 2025

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## **Introduction**

### **Background**

The Housing Ombudsman's dispute resolution principles are: be fair; put things right; and learn from outcomes. The Ombudsman applies these principles internally to complaints about the service it has provided to its customers as well as externally. The appointment of the Independent Reviewer of Service Complaints is intended to enhance our learning with an independent perspective and demonstrate our openness through the publication of the Reviewer's reports.

Felicity Mitchell was appointed Independent Reviewer of Service Complaints in April 2025.

### **Service complaints during the period**

This report covers service complaints closed during the period 1 October 2024 to 31 March 2025. The Ombudsman's approach to service complaints is to uphold them if there is any doubt over the service provided. During this period:

- The service investigated and closed 854 service complaints at stage 1 and 9 at stage 2.
- It upheld or partially upheld 671 service complaints at stage 1 and 3 at stage 2.

The total of service complaints investigated and closed at stage 1 and stage 2 (863) represents 8.2 per cent of the enquiries and complaints received by the Ombudsman during same period (10511).

### **Sample selection**

The Ombudsman selects cases for review in each six-monthly period. For this review period, 12 cases were randomly selected. This approach was used to help us to identify any new or emerging trends in our service delivery.

## Report

1. This is my first report since my appointment as Independent Reviewer in April 2025. I was given access to the service complaint files for 12 complaints from the period 1 October 2024 to 31 March 2025. Ten of those complaints were resolved at stage 1, and 2 were resolved at stage 2. I was aware that, should I have found it necessary for my review, I could have asked for access to the landlord complaint files.
2. Eight out of the 10 stage 1 complaints and both stage 2 complaints were upheld at stage 1. One of the stage 2 complaints was not upheld at stage 2.
3. Nine of the 12 complaints related to delays, timeliness, or not being kept up to date. One related to general customer service. The 2 that were not upheld related to failure to follow process. In every case, even those that were not upheld, the resident received an apology and/or an explanation for what had happened. I did not identify any significant inconsistencies in the approach of the Service Complaints Investigators (SCIs) to these complaints.
4. I did not find it necessary to ask to see the landlord complaint files in the complaints that related to the timeliness of the landlord complaint. The service complaint files contained all the necessary information about correspondence and phone calls between the caseworker and the resident in the landlord complaint up to the date of the service complaint and sometimes beyond its conclusion. In one case (case 11) I asked for, and was given, further information about the landlord complaint.
5. The complaint about general customer service (case 6) was about how the Service had handled the early stages of the landlord complaint and there was adequate information on the service complaint file for me to reach a conclusion about how it had been handled.
6. The 2 complaints (cases 2 and 4) about failure to follow process were essentially a challenge to the Service's decision not to investigate the resident's landlord complaint. Case 2 was a straightforward case – the resident was not a tenant of a landlord that is a member of the Scheme. (His service complaint related to how

that decision was communicated.) Case 4 was a little more complex. The decision turned on whether the resident was a permanent tenant or was in temporary accommodation under the council's duty to temporarily house homeless people. The service complaint file contained the review decision and other documents from the landlord complaint file. I did not find it necessary to ask for other documents from the landlord complaint file in either case.

## **Analysis of cases**

7. On the whole, the service complaints I reviewed were investigated thoroughly and handled empathetically. The stage 1 and 2 outcomes were explained clearly, and the outcomes were reasonable. In one case that was not upheld (case 2), the SCI nevertheless apologised for the issues the resident had experienced and signposted him to other possible sources of help. The resident responded positively to this prompt and sensible resolution: "I'm happy with this response and the professionalism it was handled with."
8. There is always room for improvement, and in the rest of my report I will identify those areas and make recommendations.

## **Timeliness**

9. I am pleased to say that in almost every case, the timeframes set by the Service Complaints Process were broadly met. In 5 cases (cases 1, 4, 5, 11 and 12), deadlines were missed by a day or so for either the acknowledgement, the stage 1 outcome, or the stage 2 acknowledgement.

In one case (case 11 – the most complex of any of the complaints I reviewed), the timeframe was extended. I have not identified any concerns about the overall timeliness of the service complaints process itself.

10. The main theme that ran through almost every case was that residents' landlord complaints were not being resolved as quickly as they wanted. This is unsurprising. The Service has been managing significant and very rapid growth in its caseloads. It has expanded its case-handling capacity to manage this growth,

but recruiting and training new caseworkers takes time, and has an impact on the capacity of existing caseworkers and managers. The Service is therefore grappling with the high demand and bottlenecks that accompany rapid growth.

11. In my experience there will always be some complainants who are unhappy with the speed at which their complaint is progressed. Making and pursuing a complaint requires mental and physical resources and people often come to an ombudsman service after a lengthy and exhausting battle with the organisation that they are complaining about. Their complaint is often critically important to them. In those circumstances, any delay, or the feeling that their complaint is not being taken seriously, is likely to heighten the complainant's distress.
12. All but 2 of the cases I reviewed were variations on this theme. There were examples of long delays at different stages – sometimes at every stage - in the investigation of the residents' landlord complaints. Any delay is of course regrettable, and I am aware that the Service is working hard on this.

## **Setting and, where necessary, adjusting expected timeframes**

13. Several of the complaints about timeliness included the complaint that residents had not been kept up to date regarding the progress of their landlord complaint. Often this was because there had been no progress because the complaint was waiting for a case-handler to become available. In some cases, the residents had been told to expect activity within a timeframe that was no doubt realistic at the time it was set, but which was then missed. In some cases (cases 7, 8, and 10), the Service's call-back timeframe was missed.
14. It is difficult to give an accurate indication of how long an investigation stage will take at the front end of a complaint, when timeframes are already lengthy and likely to extend. Setting a timeframe that is overly generous might lead to a complainant losing heart and giving up altogether. Setting one that turns out to be too optimistic causes disappointment and loss of trust. This balance is particularly difficult to strike where casework demands and capacity are uncertain.

Nevertheless, it is important to set timeframes that are realistic and achievable, and to have a process in place for updating residents when those timeframes are likely to be missed.

## **Explaining delays and acknowledging the stress these can cause**

15. A well-worded and genuine apology can often de-escalate matters and can go a long way to rebuilding the relationship of trust that is essential to effective complaint-handling. In my view, in the context of a service complaints process, apologies should be offered liberally. This is particularly the case where a service is struggling to match capacity to demand, and delays are endemic. Even where advertised timescales have been met it is likely that those timescales will be disappointing to complainants. The Service accepts that residents are waiting longer than they should be, and is working to reduce the waiting time. I am therefore pleased to see that all the written outcomes I saw contained apologies for the delays that were the subject of the residents' complaints.

16. Explaining the reasons that cases are taking longer than anyone would like can also help to restore confidence in the process. SCIs offered explanations for lack of timeliness in every upheld case. Some of the explanations for delay were empathetic and clear (although the language could be simpler – see Section 4, below), for example:

“... the delays you experienced aren't specific to your case alone; this is a broader issue affecting many of our service users ... We're actively working on recruiting more staff and caseworkers to reduce wait times and improve the overall efficiency of our service.” (Case 1)

“I can see that our casework colleagues have not yet contacted you to discuss and progress your landlord complaint, for which I am very sorry. I do appreciate that residents bring their landlord complaints to our service during what can be a time-consuming and frustrating journey in navigating their landlord's internal complaints process, so to be met by slow communication from our service can only exacerbate these frustrations.” (Case 3)

"While I do not wish to make excuses, I do need to be transparent about the ongoing challenges we are still facing due to the increasing demand for our services. It is extremely unfortunate that your landlord complaint case continued to be impacted." (Case 5)

17. The tone varied when it came to explaining why the Service is not offering regular updates. A good example is:

"Whilst we would like to be able to provide all residents with regular updates, it's not possible at the moment. Therefore, we generally only provide an update when there is a meaningful change or progression on a case" (case 1)

18. But some explanations come across as patronising and even rather defeatist:

"We also managed your expectations and advised that while your case is awaiting allocation for investigation, we will not be able to comment further and that it is not necessary to contact us for updates.

"While cases are in the queue awaiting allocation there is very little our Service can do to discuss the case, provide updates, or assist with any ongoing issues" (case 5)

19. In case 12 (one of the stage 2 complaints), the SCI explained that one reason for delay was that the case worker required their manager's approval for letters. In my view this level of transparency might undermine a resident's confidence in the case worker's capabilities.

## **20. Recommendations**

- 20.1. **Review how timeframes are set and communicated to residents.**
- 20.2. **Consider allocating some resource to sending updates to residents where the initial timeframe is likely to be extended. This may relieve pressure on resources elsewhere.** (I understand that proposals for resourcing this function are already under consideration.)



- 20.3. **Develop good standard paragraphs, covering commonly recurring issues such as delays, that are easy to adapt to individual circumstances.**

## **2 Resolving the service complaint**

### **Closing down complaints effectively**

21. In 2 cases (cases 6 and 9) no written outcome was issued because the service complaint concluded with a phone call. This sort of informal resolution can be particularly effective where, as in these cases, a complainant struggles with their communication. It can be a quick and efficient way to bring a complaint to a conclusion. But it needs to be made clear that the phone call does in fact conclude the matter. The notes of the relevant calls do not record whether the SCI explained to the resident that the call concluded the service complaint.
22. In case 6, the SCI resolved the service complaint by asking the landlord complaint caseworker to call the resident but there was no follow up to check whether the caseworker made the call. They did not, and so the resident contacted the SCI again. The Service Complaints process stipulates that outstanding actions should be tracked and monitored but the Service Complaints WorkPro process map does not appear to have a specific action to monitor outstanding actions.
23. In case 4 the resident had a significant language barrier. The SCI did try to call the resident to explain the stage 1 outcome, but only once. The SCI also offered in the outcome letter to explain it over phone. Emails following the stage 1 request which indicate that the resident was expecting further correspondence – perhaps a stage 2 outcome – were not closed down, and the last one was not responded to, although it was received during the 4-week window following the stage 1 outcome.
24. In case 1, the SCI apologised to the resident for having to wait longer than he expected and apologised for specific periods of delay in the stage 1 outcome. The SCI accepted that the delay would have been frustrating and stressful.

The resident requested escalation to stage 2 and his request was ultimately refused because his request did not raise any issues that were not covered in the stage 1 outcome. However, the resident had said in his original service complaint that the delays had had a negative impact on his health, and he repeated this, with more detail, in his request for escalation to stage 2.

25. The stage 2 request was considered by the Customer Insight Team Manager (CITM), and the original SCI then wrote to the resident refusing the request for escalation. At the end of his letter, the SCI asked whether the resident had medical evidence to support his statement that his health had been affected. The resident sent in a medical report, but there was a delay of nearly 2 months before a further response was sent to the resident. The SCI explained in a letter that the CITM had confirmed that the service complaint could not be escalated to stage 2. This was because the resident's complaint about delay had already been accepted, and the new medical evidence stated that it related to the impact of his landlord complaint – it did not mention the service complaint.
26. In my view it would have been challenging for the resident to obtain medical evidence that measured the extent to which his health had been affected by the way the Service was handling his complaint, as opposed to the behaviour of his landlord. I do not consider that it was reasonable to ask the resident to get that sort of medical evidence, or to reject the evidence he did provide because it was insufficiently precise. Obtaining medical reports often costs money and is not a good use of precious NHS resources. In my view it ought to have been taken as read that a stress-related health condition caused by the resident's complaint against the landlord would likely be exacerbated by further delays by the Service. I am pleased to note that, since this case was concluded, guidance to SCIs has changed, and they no longer ask for medical evidence.
27. The SCI's letter again leaves open the opportunity for the resident to provide further information, and again the resident replies, repeating his main points of complaint. The complaint is not finally closed down until nearly 4 months after the complaint was first lodged. In that letter, the SCI explains that the resident's health condition was considered when allocating priority to the complaint.

28. In each of these cases, the door was left open to further correspondence. I can see that, in case 1, the intention was to be helpful, but the effect was simply to extend the process.

**The resident's problems with the landlord are ongoing**

29. Case 5 was the resident's second service complaint (his first was in Jan 24). The resident complained about delays that were having an impact on his health. His landlord complaint reached its conclusion in October 2023, but it was not until May 2024 that it was assessed as "duly made". The resident was told it was progressing to investigation in July 2024. The stage 1 outcome covers only the period after the first service complaint. At that point (January 2025), the determination on the landlord complaint had still not been sent to the resident.

30. Although the outcome letter is empathetic and offers a good explanation for the delays, it comes across as powerless to help practically. No action is taken to try to speed up the investigation, and the implication is that nothing can be done. The SCI says:

"While cases are in the queue awaiting allocation there is very little our Service can do to discuss the case, provide updates, or assist with any ongoing issues. Therefore, I am afraid our Service cannot offer immediate help with your ongoing housing situation. Please do continue to raise your concerns directly with your landlord. You may also wish to contact the Citizens Advice Bureau who may be better suited to offer immediate help and advice."

31. The SCI goes on to direct the resident to sources of support for his mental health issues and with advocacy. In case 7, there had been delays throughout the process, including a delay of 8 months progressing the case to the "duly made" stage. The stage 1 outcome acknowledged and apologised for delays at each stage, and for missing the service standards on responding to emails and call backs. The resident was still experiencing difficulties with his landlord and the SCI recommended that he should go to Citizens Advice for help with those ongoing concerns. The SCI signposted the resident to sources of support for his

mental health (although the SCI did not acknowledge the resident's physical health issues, and it would have been good to see a more empathetic response).

32. An apology for delays is, in my view, unlikely to restore a resident's confidence in the Service if no action is then taken to expedite their complaint. Currently, all cases go through a risk assessment process at the outset, and this process can be repeated at any stage. A case's sensitivity is assessed based on the severity of the housing issue, whether or not the issue is ongoing - and for how long, and the resident's circumstances. The outcome of the risk assessment feeds into the allocation process, and whether the case should be prioritised. It would be good practice to carry out a fresh risk assessment, following a discussion with the resident at the conclusion of the service complaints process, to see whether there are any new, or previously unknown factors that might affect the initial assessments of risk and priority.
33. In case 11 (one of the stage 2 complaints), the resident complained that the landlord had not complied with the Service's determination on his multi-headed complaint. This followed a review of the landlord complaint, and lengthy further correspondence with the resident about whether or not the landlord had complied with the orders and recommendations made. In the stage 1 outcome, the SCI told the resident that his only options were to raise a new complaint or bring judicial review proceedings. At stage 2 (November 2024), the SCI tried to resolve some of the compliance issues by asking the caseworker to write to the resident. But the SCI reiterated that the resident would need to bring a new complaint about his ongoing issues with the landlord. This came at the conclusion of a process that had begun in November 2021 (although the landlord did not complete its consideration of the complaint until April 2022).
34. During my review, the Dispute Resolution Team helpfully provided some further background to case 11. The team explained that new issues could not be investigated without the resident making a fresh complaint that was accepted as "duly made". Ongoing issues raised after the review process had concluded could not be investigated as the statutory dispute resolution process was at an end. The legal basis for reaching that conclusion was set out for me.

35. Ombudsman schemes generally require complainants to give the body complained about a proper opportunity to respond to the complaint before the scheme accepts it for investigation. Most schemes have the flexibility to accept complaints early in certain circumstances. HOS has this discretion under paragraphs 32 and 42a. of the Housing Ombudsman Scheme. Moreover, some ombudsman schemes are prevented from assisting complainants with their internal complaints, but the Service does support residents to bring their landlord complaints to a conclusion. In this context, it seems anomalous that residents who are still experiencing issues with their landlord cannot draw on some support, especially if the issues they are experiencing are a continuation of their original complaint.
36. In my view, the Service should consider whether more ought to be done to support a resident experiencing ongoing issues that are the subject of an existing complaint. For example, can these ongoing issues be resolved by dialogue with the landlord to avoid the need for a “new” complaint (and reducing potential caseload)? Should the fact that the resident has had to raise a “new” complaint be specifically recognised in the risk assessment? Should the “new” complaint be prioritised so that the resident avoids a lengthy wait for a determination?

### 37. Recommendations

- 37.1. **Where a service complaint is resolved informally, ensure that SCIs make it clear to residents that their service complaint will be closed, and record that they have done so.**
- 37.2. **Add a “monitoring” step to the Service Complaints Workpro process map to ensure that outstanding actions are followed up.**
- 37.3. **Consider whether further guidance for SCIs is needed to help them close off complaints effectively once they have reached the end of process.**
- 37.4. **Add to the potential outcomes of the Service Complaints Process to include a review of the initial risk assessment to see whether there are any new, or previously unknown factors that might affect the initial risk assessment.**

- 37.5. **Consider whether any further steps should be taken to assist residents to resolve issues that are ongoing, such as supporting the resident to pursue their complaint, adjusting the risk assessment criteria, and/or prioritising their “new” complaint.**

## **4 Simple English**

38. It was obvious from some of the complaints that the residents did not find it easy to communicate clearly. Residents in cases 4 and 9 had a language barrier to overcome, and in other cases, mental health difficulties or physical disability affected their communication.
39. In each of the cases where written outcomes were sent, the outcome summarised the issues and set out the SCI's conclusions clearly. Some were very long (the stage 2 outcome for case 11, which was the most complex, was 10 pages long). Most could have been written in more straightforward language.
40. Some examples of wording that could be simplified follow:
- The stage 1 acknowledgements include the phrase “your concerns have been accepted as a stage One complaint about the services you have received from the Housing Ombudsman”. This is a little ambiguous and may lead residents to believe that their complaint has been upheld rather than accepted for investigation. (Alternative wording: “We have decided we can look at your complaint about our service.”)
  - “The delays you have experienced are not singular to your case, however, I recognise that you have waited a long time” (case 7). (Alternative wording: “I know you have been waiting for a long time. Unfortunately, all of our cases are taking longer than we would like.”)
  - “I do appreciate that I have already explained the challenges this Service is facing, so I will refrain from an extended outline of similar information here. However, I would like to offer my sincere apologies for the impact upon your customer journey” (case 7) (Alternative wording: “I won't repeat the

explanation I have given you before about the challenges we are facing. I am deeply sorry for how this is affecting you.”)

- Phrases like, “managing expectations” and “being transparent” about delays appear often. These may be useful phrases internally are unlikely to mean much to residents.

41. I make no recommendations here because I am aware that this is an ongoing area of work for the Service.

## **5 Recording**

42. In each complaint, the letter of acknowledgement asks the resident to say what outcome they are looking for. This is good practice. But in the cases I reviewed, the resident does not usually answer that question. In most cases, the desired outcome will be obvious: they would like their landlord complaint to be resolved quickly. Where the desired outcome is obvious, the SCI could include it in the complaint summary and ask the resident to say if they are looking for something else. If the desired outcome is not obvious, then the SCI should follow up if the resident does not respond.

43. In case 8, the complaint record shows that the resident has serious mental health issues, including suicidal tendencies (although not current), but there is not a clear record of any vulnerabilities or safeguarding needs, and some call records state that there are no vulnerabilities or special circumstances. This may indicate a lack of consistency in recording and/or accessing information about a resident’s potential vulnerabilities. This is an area I would like to explore further in future reports.

### **44. Recommendation**

- 44.1. **Consider the wording of the acknowledgement letter regarding the desired outcome.**

## **6 Prioritising complaints**

45. Delays and bottlenecks generate more work for case-handling teams, as well as service complaints. In this section I look beyond the Service Complaints process to consider whether there are improvements that could be made to the process of investigating landlord complaints.
46. Prioritising some cases over others is always a challenging exercise. This challenge is all the more acute where a significant number of complainants have mental health difficulties, disabilities, or are otherwise vulnerable. If every case is treated as a priority, then no case is a priority. I have referred above to the likelihood that residents who have complained about delay will complain again if they are left in the system, and that will take up time and resources.
47. I have reviewed the HOS internal risk assessment guidance and its published allocations policy. There is a triage system in place under which each case is assigned a “case type” indicating its complexity and linked to an “investigation pathway”. Cases in each pathway are allocated to an investigator or adjudicator (depending on the pathway) in age order, with some cases given priority based on their sensitivity, in line with the internal risk assessment guidance.
48. It is good practice to manage allocation proactively in this way, balancing age, the urgency of the complaint itself, and the impact any delay is likely to have on the resident. Another relevant factor in this difficult balance is the potential for the resident to place a high demand on resources. It is uncomfortable to prioritise cases that are not objectively urgent but sometimes that is the pragmatic approach.
49. The need for a prioritisation process is particularly acute where complainants have mental health difficulties. In cases 8 and 10 the residents complained about poor communication and delays. In case 8, the complaint record shows that the resident has serious mental health issues, including suicidal tendencies (although not current). In case 10, the resident says that her mental health is being seriously affected by the antisocial behaviour of a neighbour which is the subject of her landlord complaint.



50. Residents with complex mental health issues and vulnerabilities, and those who are challenging to manage, doubtless benefit from prioritisation and possibly some extra support whilst waiting for their case to progress. Moving these cases through the system quickly means that less resource is spent responding to calls and correspondence and trying to de-escalate their concerns.

51. Cases that are left waiting still need attention if a genuinely good level of service is to be maintained. Inevitably some complainants are not able to manage the wait and absorb additional casework resource. To an extent, this is currently being managed retrospectively through the Service Complaints process.

52. In my view, more could be done to support residents proactively during periods of inactivity, while the Service works to improve its turn-around times. It is good practice to offer regular updates even if there is little to say – at the very least it means that complainants do not feel completely forgotten. It may be that some of this can be automated. All of this requires resourcing. But investment in this area is likely to reduce pressure further down the line. I understand that there are already proposals to put some additional administrative resource into this area.

### **53. Recommendations**

**53.1. Consider whether further steps might be taken to expedite a complaint where the resident has made a service complaint that has been upheld, has made multiple landlord complaints, or is otherwise likely to absorb considerable resource. One option might be to amend the allocation policy to include as a relevant factor the possible resource implications of such a complaint.**

**53.2. Consider what steps can be taken to better support residents during the periods of inactivity before their complaint is allocated for investigation.**

## **Conclusions**

54. My review has not thrown up any surprises. Essentially, this small sample of service complaints indicates that the process is operating effectively, SCIs handle their investigations empathetically, and outcomes are reasonable. I have made several recommendations that I hope will help the Service to improve, particularly around managing the inevitable delays residents are currently experiencing.

## Management responses

### 1) Recommendations from the October 2024 – March 2024 IRSC report

| Recommendation  | Management Response  | Responsibility and deadline   |
|---|--|---|
| 20.1. Review how timeframes are set and communicated to residents.  | <p>Accepted</p> <p>a) We will review current communications to ensure accurate timescales are communicated</p> <p>b) We will add sense checks to the Dispute Resolution forward plan at 3 monthly intervals or for whenever significant changes to our timescales are identified to ensure timescales remain realistic</p> | <p>Head of Dispute Resolution<br/>31 December 2025</p> <p>Head of Dispute Resolution<br/>31 December 2025</p> |
| 20.2. Consider allocating some resource to sending updates to residents where the initial timeframe is likely to be extended. | <p>Accepted</p> <p>DSR directorate has undertaken a service improvement initiative relating to customer journeys which including</p>   |   |

| Recommendation  | Management Response  | Responsibility and deadline  |
|---|--|--|
| <p>This may relieve pressure on resources elsewhere.</p> <p>(Internal audit rec 6 – management responses (i) refers)</p>                              | <p>mapping the journey and identifying opportunities to improve/adapt this</p> <p>There will be significant process and structural changes in the DSR directorate within the next six months. This will include establishing a permanent administrative support team. The role of the team will include providing updates to customers throughout the casework journey</p> | <p>Head of Casework Assessment &amp; Support</p> <p>31 December 2025</p> |
| <p>20.3. Develop good standard paragraphs, covering commonly recurring issues such as delays, that are easy to adapt to individual circumstances.</p> | <p>Accepted</p> <p>We will review the standard paragraphs used in service complaints and ensure they are empathetic and clear and align with the Dispute Support and Resolution approach and timelines</p>   | <p>Customer Insight Manager</p> <p>31 October 2025</p>                   |
| <p>37.1. Where a service complaint is resolved informally, ensure that SCIs make it clear to residents that their</p>                                 | <p>Accepted</p>  |  |

| Recommendation  | Management Response  | Responsibility and deadline   |
|---|--|---|
| service complaint will be closed, and record that they have done so.  | A review of current methods of communicating and recording case closure will be undertaken, and any suitable additional or alternative communications methods will be identified and put in place. Process changes will be documented, implemented and reviewed to ensure accurate recording | Customer Insight Manager <ul style="list-style-type: none"> <li>Communications: 31 December 2025</li> <li>Recording: 31 March 2026</li> </ul> |
| 37.2. Add a “monitoring” step to the Service Complaints Workpro process map to ensure that outstanding actions are followed up. | Accepted<br><br>We will explore the suitability of the Workpro system to capture this information, and the change will be applied<br><br>If the Workpro system is not suitable an alternative way will be identified and implemented   | Customer Insight Manager<br>31 December 2025<br><br>Customer Insight Manager<br>31 March 2026   |

| Recommendation   | Management Response  | Responsibility and deadline                  |
|--|--|--|
| 37.3. Consider whether further guidance for SCIs is needed to help them close off complaints effectively once they have reached the end of process.  | Accepted<br><br>We will review the guidance provided to SCIs and update as necessary   | Customer Insight Manager<br>31 December 2025 |
| 37.4 Add to the potential outcomes of the Service Complaints Process to include a review of the initial risk assessment to see whether there are any new, or previously unknown factors that might affect the initial risk assessment. | Accepted<br><br>A step will be included in the process for service complaints to ensure changes are captured and referred back to DSR for review   | Customer Insight Manager<br>31 December 2025 |
| 37.5 Consider whether any further steps should be taken to assist residents to resolve issues that are ongoing, such as supporting the resident to pursue their complaint, adjusting the risk assessment                               | Accepted<br><br>We need to ensure that we do not stray into advocacy or interventions while an issue is within the landlord's complaints process due to challenge around our impartiality (especially if the complaint is then subsequently brought to us for formal |  |

| Recommendation                                       | Management Response   | Responsibility and deadline  |
|--|---|--|
| criteria, and/or prioritising their “new” complaint. | <p>investigation). We will also need guidance to ensure we’re robust around checking that there is an ongoing unresolved issue rather than an attempt to reopen a dispute where the resident is unhappy with the outcome (i.e. paragraph 42.1 of the Housing Ombudsman Scheme):</p> <p>a) Scenario map the incidents of residents contacting us regarding unresolved issues post determination/ compliance to inform potential ‘to be’ process maps</p> <p>b) Ensure that there is a mechanism to identify at our assessment stage cases that relate to an ongoing issue (i.e. previously investigated but despite compliance continues to be considered unresolved by the resident) once they’re referred to us post completion of the landlord’s complaints process. Agree on the best approach for prioritising these cases (see item b) to ensure that they are</p> | <p>Head of Dispute Resolution<br/>31 March 2026</p> <p>Head of Casework Assessment and Support<br/>31 March 2026</p> |

| Recommendation   | Management Response  | Responsibility and deadline  |
|--|--|--|
|  | investigated under shorter timeframes than a traditional investigation   |  |
| <p>44. Consider the wording of the acknowledgement letter regarding the desired outcome.</p> <p>(Internal audit rec 4 and management response refers)</p>  | <p>Accepted</p> <p>The acknowledgement letter will be reviewed to ensure it clearly states the ‘understood’ desired outcome, with the opportunity for the resident to come back to us to revise this early in the process if this is incorrect</p>   | <p>Customer Insight Manager</p> <p>31 December 2025</p>                |
| <p>53.1. Consider whether further steps might be taken to expedite a complaint where the resident has made a service complaint that has been upheld, has made multiple landlord complaints, or is otherwise likely to absorb considerable resource. One option might be to amend the allocation policy to include as a</p> | <p>Accepted</p> <p>The current allocations policy already makes allowance (under sensitive cases definition) for strategic decisions around the expedited allocation of cases. However, we will ensure that there is relevant guidance to teams around possible scenarios for use of the sensitive cases clause (as it should not be used to address behaviour that needs to be managed with a</p> | <p>Head of Casework Assessment and Support</p> <p>31 December 2025</p> |



| Recommendation   | Management Response  | Responsibility and deadline  |
|--|--|--|
| relevant factor the possible resource implications of such a complaint.  | customer, as per the managed behaviour policy) and also around process for requesting/approving such a request.  |  |
| <p>53.2 Consider what steps can be taken to better support residents during the periods of inactivity before their complaint is allocated for investigation. (Internal audit rec 6 – management responses (i) and (iii) refer)</p> | <p>Accepted</p> <p>We will introduce a call at initial allocation within Dispute Support and at Casework Assessment and Support so that staff can manage customer expectations and provide clarity over the process. We will also be reviewing communication templates to ensure that there is clarity for customers on what happens next when a case moves from being allocated to a dedicated caseworker to an unallocated pool and what do if any circumstances around their case changes. We will also be standing up a permanent casework admin team who have responsibility for updating customers in unallocated pools should there be changes to the expectations set when we informed them around next steps. This will be delivered as part of the transition to the new structures and ways of working.</p> | <p>Head of Casework Assessment and Support &amp; Head of Dispute Support</p> <p>31 December 2025</p> |

| Recommendation | Management Response | Responsibility and deadline |
|----------------|---------------------|-----------------------------|
|                |                     |                             |

**2) Recommendations arising from the April 2024 – September 2025 Internal Audit review of service complaints  
(providing assurance in the absence of an IRSC)**

| Recommendation  | Management Response  | Responsibility and deadline                            |
|---|--|--|
| 1.Stage 2 performance data: Issues with the accuracy of the performance dashboard for stage 2 acknowledgement targets should be resolved as a matter of urgency.  | Accepted<br><br>Performance dashboard will be revised to meet this recommendation  | Head of Quality & Customer Insight<br>31 December 2025 |
| 2.Completeness of customer information in WorkPro: It should be mandatory to complete all customer information fields in WorkPro. Ideally this would be built into the WorkPro functionality, but if this is not possible staff should receive training and | Accepted<br><br>It is not possible to make the fields in Workpro mandatory, but we will undertake training for colleagues and will continue with regular QA of reasonable adjustment data, raising to ELT any non-compliance | Head of Quality & Customer Insight<br>31 December 2025 |

| Recommendation  | Management Response  | Responsibility and deadline                  |
|---|--|--|
| guidance to reinforce this, and MI should be produced to highlight any gaps.  | We will develop a suite of RA MI reporting to support this   |  |
| 3.Capturing individual complaints and outcomes: HOS should investigate whether WorkPro functionality can be expanded to capture complaints and outcomes at a granular level. If not it should consider make the recording of this information via free note fields in WorkPro mandatory. Management should also consider how they can capture this information in reporting to aid improvement programmes | Accepted<br><br>This requirement is included in the requested enhancements for Service Complaints recording in Workpro | Customer Insight Manager<br>31 December 2025 |
| 4.Lack of consistency in Stage 1 and 2 acknowledgement and  | Accepted   |  |

| Recommendation  | Management Response  | Responsibility and deadline  |
|---|--|--|
| outcome letters: The HOS style guide should ensure communications with customers are succinct, clear and consistent for DSR and SC determinations, and the effectiveness of changes should be tested with the Resident Panel.   | We will improve service complaints response letters in line with the HOS style guide and will test these with the Resident Panel.  | Customer Insight Manager<br>31 August 2025   |
| <p>5. Transparency and status of service complaints process:</p> <p>a) HOS should consider how it can better explain its service complaints processes to individual users of the service at the initial point of contact, with particular consideration for customers with reasonable adjustments or special communication needs.</p> | <p>Accepted</p> <p>a) Script of process to be developed and communicated to residents when complaint is acknowledged – this will need to take account of communications preferences.</p> <p>b) (i) Process mapping has commenced with the PPMO team and this will be used to develop a flowchart of the service complaints process that will be placed on the website.</p> | <p>a) Customer Insight Manager<br/>31 December 2025</p> <p>b)(i) Customer Insight Manager<br/>31 December 2025</p> |

| Recommendation   | Management Response  | Responsibility and deadline   |
|--|--|---|
| b) HOS could consider how it can make its service complaints customer facing structures more transparent to external users of the service, and how to streamline and simplify the customer journey.  | b) (ii) Work will take place to look at the customer journey and new systems as part of Transformation. We will include this recommendation as part of this work.  | b)(ii) Head of Quality & Customer Insight<br>Indicative date of 31 March 2026<br>(transformation dependent) |
| 6.Transparency and status of DSR Process:<br>a) HOS should consider how it can better explain its DSR processes to individual users of the service at the initial point of contact, with particular consideration for customers with reasonable adjustments or special communication needs. It should also | Accepted<br><br>DSR directorate has undertaken a service improvement initiative relating to customer journeys which includes mapping the journey and identifying opportunities to improve/adapt this.<br><br>(i) There will be significant process and structural changes in the DSR directorate within the next six months. This will include establishing a permanent administrative support team. | (i) Head of Casework  |

| Recommendation   | Management Response   | Responsibility and deadline  |
|--|---|--|
| <p>consider introducing status updates for DSR processes and set intervals from the initial contact to ensure customers are aware of where their case is in the overall process and to manage their expectations about timescales.</p> <p>b) HOS could consider how it can make its DSR customer facing structures more transparent to external users of the service, and how to streamline and simplify the customer journey.</p> | <p>The role of the team will include providing updates to customers throughout the casework journey. This will be tested with customers of the journey.</p> <p>(ii) We will review the customer information on our website to assess the quality around our end-to-end casework processes and expectations, identifying any suitable improvements and acting to make these.</p> <p>(iii) We will introduce a call at initial case allocation within Dispute Support and at Casework Assessment and Support. There is already an introduction call in place at allocation for investigation. This will be delivered as part of the transition to the new structures and ways of working.</p> | <p>Assessment &amp; Support<br/>31 December 2025</p> <p>(ii) Head of Dispute Support<br/>31 December 2025</p> <p>(iii) Head of Dispute Support and Head of Casework Assessment &amp; Support<br/>31 January 2026</p> |

| Recommendation  | Management Response   | Responsibility and deadline  |
|---|---|--|
|   | (iv) We will undertake a reorganisation of Dispute Support and Casework Assessment and Support service areas which will include the reduction of handovers within the customer Journey.                 | (iv) Head of Dispute Support and Head of Casework Assessment & Support<br>30 November 2025 |
| <p>7. Lessons learned process:</p> <p>A standardised lessons learned process should be introduced to enhance the capture of learning and improvements for Service Complaints. For example a lessons learned feedback form could be completed at the end of each case where there are lessons to be learned to capture any</p> | <p>Accepted</p> <p>This is work in progress as part of the development of our holistic feedback loop reporting. We will develop a learning capture form for cases where there are lessons to learn.</p> | <p>Head of Quality &amp; Customer Insight</p> <p>31 eceember 2025</p>                      |

| Recommendation  | Management Response | Responsibility and deadline |
|---|---------------------|-----------------------------|
| improvements, including responsibility for further actions and sign-off when actions have been completed. |                     |                             |



### 3) Update on previous IRSC actions

| Previous recommendation   | Management Response   | Responsibility and deadline                                       |
|---|---|---|
| Complaint responses in the case of delay should contain some statement of what the organisation intends to do to improve the speed of case handling and responsiveness. | Accepted<br><br>We will develop a standard response to be used when responding to service complaints that will shift according to the current actions being taken to respond to the speed of case handling                    | Quality Standards Manager<br>31 March 2024<br><br><b>Complete</b> |
| Consideration be given to reinstituting a call-back time target.  | Accepted<br><br>Callback SLA in place of 5 working days with residents being advised of this by our Enquiries provider. Single way of recording callbacks in place and reporting developed to monitor performance             | Director of DS&R<br>31 March 2024<br><br><b>Complete</b>          |
| HOS should investigate methods of improving its tracking of case delays, especially in updating complainants about progress.  | Accepted<br><br>We accept the recommendation. We have already started providing proactive updates to residents to inform them of progress. We are also reviewing our communications with residents to ensure we give accurate | Head of Dispute Resolution<br>31 March 2023                       |

| Previous recommendation | Management Response  | Responsibility and deadline  |
|-------------------------|--|--|
|                         | <p>information about the likely timeframe in which we will deal with their cases.</p> <p>We are also undertaking a system review which will explore increased system-generated alerts to trigger case update action.</p> <p>2023 Update: The end to end review of our DR service was delayed due to staffing changes but has now commenced and is on track to complete by the end of January 2024 – this will factor in recommendations regarding tracking of case delays and communication to the customer.</p> | <p>Director of DS&amp;R<br/>30 September 2023</p> <p><b>Complete – further recommendations and responses above</b></p> |