

Insight report

Learning from further investigations



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Introduction

To the credit of social landlords, there has been a transformation in thinking about resident-facing services. But success requires continuous learning, both internally and from others.

This report encourages peer-to-peer learning based on our deeper dives into individual landlords.

Unless the lessons are heeded, we could soon be back to the future.

This may be grimly familiar for anyone with long experience in social housing. The 2007 Cave Review forewarned of emerging problems with responsive repairs and tenant empowerment. This warning came despite unprecedented investment through the original Decent Homes programme. A combination of poor policy choices, economic pressures and complacency contributed to the problems we still see in our casework.

Today, we have seen a doubling of investment into repairs and maintenance, a raising of standards and greater accountability. But none of the structural pressures have eased: inflation, skills shortages, aging homes, and competing demands all remain. We do not need to repeat the same mistakes.

Yet reading this report can give you a tremendous sense of optimism.

Because it shows what change can be achieved and how outcomes can be improved, for both residents and landlords, through a combination of practical steps.

There are 3 overarching lessons that stand out in this report.

1. Merger and organisational change

It is inevitable the sector will consolidate but changes - whether local authorities reorganising their services, housing associations combining, or a landlord adopting a new operating model - will create organisational stretch. This stretch can undermine, at least in the short term, benefits which can be realised through greater capacity or new systems in the eyes of residents, unless there is a relentless focus on service delivery.

Complaints can indicate things were not necessarily going as well as expected in some cases. This insight needs to be used rather than overlooked. Conversely, complaints can also show the status quo is not sustainable without change.

2. Culture and behaviours

It is more unusual to hear resident “lifestyle” attributed for damp and mould but that does not mean attitudes have changed enough. Tenants experience a strong sense of stigma. They will be unfairly blamed for things outside their control. This is deep-rooted in society and can spill over into landlord services. It can create barriers to putting things right for an individual. Put together, it can lead to the “othering” of social tenants and social landlords not living their values; poor performance tolerated, issues not escalated, indifferent communication and the normalisation of conditions which are unacceptable.

3. Transparency

These investigations show not only the importance of having the right knowledge but reporting it. Transparency and openness around complaints and their root causes is one of the biggest changes I have seen. It has especially helped board members test assurance. Often what this data can reveal is the inherent inefficiencies of some processes. Examples reoccur in this report. The 7 different operatives who visit a property about the same issue, or the 112 times we contact a landlord for an update. These are resources that could be channelled into maintaining existing, or building new, homes.

This report’s lessons are transferable not only between organisations but to inform responses to new issues. This includes the next phase of Awaab’s Law and the likely shift to major works, driven by net zero and the new Decent Homes Standard.

For example, the very early lessons from our Awaab’s Law casework are worth sharing:

- landlords without policies in place before the law commenced
- others struggling to identify relevant cases, despite the evidence, suggesting an issue with triage

- other cases falling out of the process even though they were quickly (and effectively) identified as Awaab's Law, suggesting strengths and weaknesses in procedures
- material changes being missed

While a modest case volume at present, some lessons resonate with those here.

So, 2 questions to keep in mind are: what would we have done? And what would we do differently in the future?

Lastly, this report is part of our response to managing the demand for the Ombudsman's intervention. Our case volumes have risen 500% since 2021-22. We complete over half of our investigations within 6 months, but we want to respond more quickly to all cases. This requires new ways of working but also preventing complaints. We can see the Complaint Handling Code is embedding, promoting fairer and more consistent handling across the sector. But the last published Tenant Satisfaction Measures show stage 1 complaints rising. This calls for a renewed effort to address root causes and respond to the lessons identified in complaints.

Quite rapidly, this could see fewer complaints, fewer escalating to the Ombudsman and faster decisions by us.

Richard Blakeway

Housing Ombudsman

Background

What are further investigations?

We have the power to carry out further investigations into whether evidence of a landlord's failure in casework represents a wider systemic failure under paragraph 49 of the Housing Ombudsman Scheme.

We identify landlords for further investigation through analysis of complaints data and consideration of other sources of intelligence.

What is evidence of systemic failure?

A systemic failure in service provided by a landlord may include the following:

- a policy weakness
- repeated service failure
- service failures across multiple service areas
- service failures across multiple geographical locations
- failure to learn from complaints
- lack of oversight and governance to identify and act on repeated issues

The further investigations draw on many sources of evidence which can include:

- cases determined by the Ombudsman
- complaints performance data
- data held by the landlord
- conversations with landlord staff
- opportunities for residents to voice their views
- the landlord's policies and procedures

- governance and oversight meeting records
- news articles
- regulatory judgments from the Regulator of Social Housing and other public bodies

All sources of evidence are carefully considered to discern whether there is evidence of widespread failure. We make recommendations to landlords based on our findings and our engagement with them.

Learning in this report

This report is based on a thematic review of all published further investigation reports. We have highlighted common areas of service failure, focusing on what sources of evidence we used to arrive at our findings and recommendations. This report is based on a review of the 15 published further investigation reports since 2022.

The sections of the report represent the 4 most frequent areas of systemic failure:

1. Repairs and hazards
2. Complaints handling
3. Knowledge and Information Management (KIM)
4. Governance and oversight

We have chosen not to name landlords in the body of the report due to the length of time that has elapsed since the investigations. The landlords involved have all made significant changes to their service delivery since our engagement, which in some cases has led to substantial improvements in complaints performance and to the service provided to residents.

Landlords can use this report to consider how to diagnose weaknesses in their service provision. The report shows how multiple sources of evidence can be drawn on to identify root causes of repeated failures.

The report is based on the principles of root cause analysis. It is a technique to understand why a problem has happened, to address the underlying causes rather than treating the symptoms.

Further investigations are a kind of root cause analysis: an instance of failure presents in an individual complaint to the landlord or to the Ombudsman, and systemic investigation is a way of piecing together disparate examples and evidence to understand where systemic failure has occurred.

Where landlords have made improvements, we have included examples of action taken to address root causes of repeating issues.

Repairs and hazards

The repairs service is a core function of landlord's activities. For a resident, it might be the main point of contact with their landlord. Living with long term disrepair can be stressful and inconvenient, and at worst can pose a serious hazard to a resident's health.

Damp and mould is one of the biggest categories of repairs complaints so we have included reflections on how landlords have tackled it in this section. We also saw landlords struggling with repairs cases about windows, pests, major works, and leaks, amongst other categories of repair.

Every landlord subject to a further investigation had systemic failures present in their repairs service.

The common areas of failure that we identified in thematic review were:

- poor communication with residents regarding repairs
- unreasonable timelines of repairs
- failure to complete agreed actions
- inadequate record keeping in repairs log

Record keeping is covered in more detail in the [KIM section on page 21 of this report](#).

Working with third-party contractors was a cross-cutting theme across all of these areas, in that ineffective management of contractors often compromised landlords' ability to carry out repairs.

This section goes into more detail about how we identified issues with landlords' repairs services and what recommendations we made to improve them.

Poor communication with residents

Clear communication through the stages of a service request or major works programme is vital for maintaining a good relationship between landlord and resident. Important points for communication include:

- initial survey
- inspection
- assessment findings
- what the landlord proposes to do next
- managing expectations
- responding to follow-up queries

Poor communication about repairs was the single most prevalent theme across the landlords we investigated further. It affected 14 of 15 landlords subject to a full further investigation, and it is a common failure in many of the cases we investigate.

Examples of poor communication with residents in our casebook included:

- no response to service requests
- insufficient notice or explanation for appointments
- lack of updates during ongoing works
- residents having to tell the landlord information it should already have

- inaccurate information or no information being shared
- unempathetic and blaming tone in communication

In the further investigations, we saw how residents were left feeling confused and ignored when communication broke down with their landlord.

One landlord sought feedback on its service from a 'mystery shopper' exercise. The evaluation showed that residents had trouble accessing the repairs service through multiple channels. When the mystery shoppers did receive a response, it was often inadequate and did not respond to all issues raised, among other communication issues.

The same landlord also exhibited serious failings in its response to damp and mould cases, which require additional attention due to the hazard posed. We saw in complaints that the landlord's communication with residents was not sufficiently detailed or reassuring in such cases, and often required the resident to go between multiple teams, rather than offering a single point of contact. Accessibility of channels, tone, and a sense of being heard are fundamental to providing a good service to residents.

Key learning for the sector

Where residents are not kept informed about progress to repairs requests, they often have to chase for updates. Landlords should seek to manage expectations in a reasonable way to assure residents that progress is ongoing.

We made recommendations on improving communication with residents during repairs including:

- improve repairs monitoring processes to enable progress updates for residents
- improve the appointments process to ensure effective communication about the purpose, timing, and next steps of appointments
- create an action plan for contacting residents at risk of hazards where stock condition surveys or other sources of intelligence indicate need

Unreasonable timelines of repairs

Delays to repairs are a common source of inconvenience and frustration for residents, who have to live with disrepair while waiting for their landlord to act. Unreasonable delays are connected to communication, in that landlords should manage residents' expectations of how their issues will be resolved and when.

In several further investigations, we found evidence of repeat visits and ineffective appointments, sometimes for straightforward repairs. Where works were more complex, some landlords had reasonable approaches set out in their repairs policies, but failed to apply these in practice. For one landlord, we saw multiple examples of how it did not meet its policy objective of getting repairs right the first time, including one case where 7 different operatives attended before resolving the disrepair. This is frustrating for residents and costs them time and leave from work.

In some cases, the cause of delays was poor record keeping. Across multiple investigations, poor record keeping meant that:

- contractors and surveyors had to reassess properties multiple times
- records of previous actions were missing
- landlords failed to monitor reoccurring issues
- appointments were missed and the reason was not recorded
- jobs were left open or cancelled in error

We saw some positive examples of how landlords dealt with possible delays to works.

One landlord responded reasonably to a report of a plumbing problem. The first operative could not clear a blocked pipe, so a multi-skilled operative was sent shortly afterward.

In its meetings with us, the landlord explained that it employs several single-trade operatives, and that it is looking to train and/or employ more multi-trade operatives.

Key learning for the sector

Collecting the right data and choosing the right metrics of success is crucial to understanding the reasons behind delay and ineffective appointments. This helps landlords to learn from failures and to address root causes.

A landlord told us about improvements it had made to the length of time taken to inspect reports of damp and mould. While this is a step in the right direction, especially in the context of Awaab's Law, we asked whether it had observed reductions in the time taken to treat damp and mould. The response was that this was not captured by their software. We concluded from our casebook that delays following inspection was the more pressing issue affecting residents. This led us to be concerned that the landlord was focusing on the wrong metrics, impeding improvement of the service delivery.

Another landlord told us about the new approach it was taking to improve its repairs service. It had started to use automated appointment reminders. From this initiative, amongst others, it had seen 'no access' visits almost halve in number, from 32% of appointments to 18%. The time taken to complete repairs had reduced from 66 to 20 days. Both performance metrics reflect a significant improvement in the service provided to residents.

Key learning for the sector

We recommended that landlords:

- plan proactively for major works
- develop a policy for oversight of repairs delays beyond reasonable timelines with senior staff involvement
- state clear timelines for all types of repair in policy
- set clear expectations of responsibility for complex repairs, including with third parties
- seek resident engagement on no access policy
- collect data on and analyse the causes of missed or ineffective appointments

Failure to complete agreed actions

Where communication had broken down and there were substantial delays, a common consequence was failure to complete agreed actions such as surveys, repairs and the scheduling of further works.

We saw multiple complaints by residents where the substantive disrepair had not been resolved during the internal complaints process, suggesting failure in the feedback mechanisms and cross-team working within the landlord. Complaints should be another chance for the landlord to put things right for the resident.

For one landlord, we saw how some repair cases had been unresolved for months and even years. The landlord knew this was an issue as their annual complaints reporting highlighted that 'agreed actions/outcomes from stage 1 still outstanding' was one of the most common reasons for residents escalating complaints. Despite this knowledge, it took intervention from us to prompt remedial action.

For another landlord, we found that the extensive processes around repairs were not being consistently followed, leading to process failure and confusion for the landlord and its contractors. This led to incorrect operatives attending, incomplete repairs, and reoccurring issues for residents.

Evidence in our casebook showed poor internal and external communication, record keeping and approval processes were impeding progress on works.

Poor quality workmanship and shoddy repairs can also extend the delay and inconvenience experienced by residents. Underlying reasons for poor quality work often related to mismanagement of contractors, lack of quality assurance processes, and failure to learn from operational data.

Key learning for the sector

Where we found no maladministration in complaints coming to us, we saw how landlords acted promptly and considered a range of solutions to repairs, in order to find the best resolution and best operative for the job.

We made several recommendations to support improved timeliness and oversight of repairs:

- analyse causes of ineffective appointments
- make responsibilities for different types of repair clear in policy and procedure
- address reasons for delays to repairs including record keeping and resourcing

Complaint handling

Effective complaint handling is a window into the service delivery of a landlord. It allows landlords to understand what processes are inconsistent and spot early warning signs of failure before they escalate further. Understanding weaknesses in their service provision helps landlords to learn how to improve their service and to build better relationships with their residents.

In all of the further investigations we carried out, we found multiple examples of failures to provide an effective complaint service.

The systemic failures most prevalent in the investigations were:

- disparities between policy and practice
- a failure to evidence learning from complaints
- quality assurance issues

The focus of this section is on how evidence reviewed by us led to a finding of systemic failure in complaint handling and what recommendations we made to address it.

Disparities between policy and practice

Reviewing our casebook revealed issues in complaints handling in several further investigations. The most common issue was residents facing delays to the complaints process, frequently outside of policy timescales.

Residents felt the impact of delays when they had to wait for updates or resolution, leading to frustration, a feeling of being ignored, a prolonged complaint process, and sometimes complaint escalation.

Landlords cited varying reasons for delays including a lack of available resource, poor record keeping ([see KIM section on page 21 within this report](#)) and failures in internal communication.

We raised these issues directly with landlords, who took action to embed improvements. But there were opportunities missed to respond earlier. Landlords should already have evidence available within their own systems to recognise points of failure. In-depth evaluation of existing data could have provided the knowledge needed to try to mitigate delays or carry out root cause analysis on why delays were persisting.

The following sections illustrate how landlords' practices were not aligned to their complaint policies.

Communicating delays to residents

As a basic tool, landlords should be able to identify how many stage 1 and stage 2 complaints they have open at any time and how many responses are outside of set timescales. Identifying the volume of complaints and the timeliness of their responses can provide the landlord with an idea of the standard of the service being given to residents.

Another source of evidence on resident sentiment regarding complaints handling is the Tenant Satisfaction Measures, published annually by the Regulator.

Delayed complaint responses can lead to resident frustration, especially where the landlord does not set expectations on timescales or fails to provide regular updates to residents as to why their response is delayed.

We saw evidence of such delays that residents no longer knew what was happening to their complaint. In one financial period, we had to chase a landlord 112 times for updates to resident complaints.

Internal complaints data from 2 other landlords showed that 82% and 88% of stage 1 complaints were delayed respectively. In cases like these where the data shows consistent failure to meet timelines or follow process, it indicates underlying weaknesses in the landlord's complaints handling processes or organisational structure.

Aside from the significant inconvenience to residents, these delays also add additional pressure to the landlord to answer not only the original complaint but also the follow-up emails and calls from residents, their representatives (including councillors and MPs) or us. Depending on the nature of the complaint, it is also possible that disrepair will degrade further during the time the complaint is delayed, leading to more costly or complex repairs for the landlords.

During our investigations, landlords told us of the work being carried out to improve timeliness of complaints. Some improvement measures included recruiting additional staff to deal with the influx of complaints, introducing complaint improvement plans, and new computer software to log and monitor complaints to provide better oversight of timescales and responses.

Key learning for the sector

Following the conclusion on our further investigations, we recommended the landlords take a variety of measures to help improve.

These included:

- developing more effective executive and board-level oversight of complaints volumes and delays

- providing training to complaint staff
- ensuring systems are in place to accurately record and monitor complaints and complete any promised actions

Informal complaint handling

While some residents faced delays receiving updates about their complaints, there were many residents who faced difficulties having their complaint accepted or escalated, contrary to the Complaint Handling Code.

Informal complaint handling can present in different ways. We found over the course of our further investigations that some landlords had informal steps built into their complaint process, while others operated informal stages outside of them. Regardless of the reason, both left residents facing prolonged resolution to their complaints.

Landlords used different names for dealing with complaints before stage 1 but each resulted in delays to responses for residents and blocked access to Ombudsman escalation. We are unable to look at complaints that have not completed the landlord's 2-stage complaint process.

In some further investigations, we commented on how we had to repeatedly intervene to request escalation or acceptance of complaints, which suggests that the complaints process was not sufficiently accessible for residents.

One landlord used different classifications for complaints which depended on the discretion of the individual agent dealing with a complaint. While the Code defines what a complaint is – any expression of dissatisfaction – several landlords had a culture of labelling complaints as 'service requests/recovery' or 'non-complaints', often without explaining the difference to residents.

One landlord we reviewed had dealt with 1,575 'service recovery' cases in a 12 month period, but only registered 843 stage 1 complaints. We expressed concern that this represented an unfair treatment of residents who had not had the opportunity to complain fully.

A lack of officially recorded complaints leaves landlords unable to monitor emerging patterns and trends, resulting in repeated failures.

Key learning for the sector

Following our conclusion of the further investigations, we made recommendations that landlords align policies with the Code.

They included:

- training of staff to ensure expressions of dissatisfaction were handled as complaints
- amending complaint policies to ensure they comply with the Code
- accurate reporting of complaint figures

Learning from complaints

During our further investigations, we found multiple examples of a failure to view complaints as a chance to learn and improve services.

Complaints can be a tool to identify any underlying cause behind failings. If a landlord does not put in place ways of spotting trends in complaints, then it misses opportunities to address failings or reduce repeat complaints.

We saw examples of landlords not only failing to learn from complaints but viewing any feedback as something to be avoided, as outlined in our informal complaints section above. We often saw landlords viewing complaints as a transactional process to be completed and move on from.

The lack of emphasis on learning can present within the individual complaint response. To a resident, this often feels that their complaint has not been fully understood. It can feel like the landlord has failed to take their complaint seriously.

We also found a lack of learning in response to orders we had asked landlords to carry out at the conclusion of complaints. One landlord sent the same generic response in relation to our questions linked to learning and improvements. The responses did not list what the improvements were or how they would use them.

Some landlords have started to learn from complaints by developing strategies to monitor complaints. This is a good step towards learning, but we did not always see that the strategies were linked to plans to evaluate the findings or how this was going to affect change.

Key learning for the sector

Ideally landlords will track their complaints, have a process in place to identify trends, and use that information to make changes with an overall impact of reducing complaints and installing future preventative measures.

It is important that any strategy is fully supported by executive oversight and a vision of what learning can achieve. An effective process and oversight can turn complaints from being dealt with reactively to proactively. Getting ahead of complaint trends and understanding what process the landlord can put in place to reduce repeat complaints.

Learning from complaints to improve services and prevent other residents experiencing similar failures is a vital component of a positive complaint handling culture.

To support improved learning from complaints, we made the following recommendations:

- put in place executive oversight to ensure effective and timely learning from complaints
- provide an overview of complaints received, overall performance, lessons learned, and improvements made
- analyse and record complaint insight, monitoring to ensure the improvements have been embedded and are driving positive change

A lack of quality assurance

Quality assurance is paramount in a complaints handling framework. It involves evaluation of the quality of individual responses as well as monitoring of data quality in supporting software. The strongest quality assurance approaches track the incidence of errors and take steps to prevent them reoccurring.

Underpinning continuous improvement is a strong quality assurance programme to ensure that changes and improvements are embedded within the complaint process.

Within our investigations we saw instances of staff incorrectly editing complaint response templates, failing to address all complaint points and not providing escalation information, amongst other oversights. Quality assurance of responses, embedded within performance management, could have greatly reduced the frequency of such errors.

Poor quality complaint responses often make residents feel that they have not been heard or taken seriously. This can cause escalation to stage 2, or to us, for complaints that should have been simple to resolve. Combined with delays and poor communication, residents can be waiting for months to ultimately receive a low-quality response.

During our further investigations, some landlords put quality assurance structures in place by adding scrutiny into their process at a board level, provide additional training to complaint staff, or developing review processes to ensure responses meet standards. We welcomed these developments.

Key learning for the sector

As well as these measures we also made quality assurance recommendations to landlords, including:

- implementing quality assurance checks on stage 1 and stage 2 complaint responses

- embedding clear quality expectations into complaint policies and procedures
- creating an action plan to improve timeliness, quality, and consistency of complaint responses
- producing a quality assurance framework

Knowledge and information management

Knowledge and information management (KIM) is fundamental to how landlords function. It covers how information is created, stored, used, and shared. It goes beyond 'record keeping' alone to encompass all data-related activities undertaken by landlords.

Our [Spotlight report on KIM](#) outlines how KIM is crucial to landlords' compliance activities, their governance and reporting, proactive management of risks and hazards, and the provision of a high-quality service to residents.

While complaints that are specifically about KIM are low in number, analysis in the Spotlight report found that about two-thirds of complaints assessed by us have an issue with the data and information available during the investigation.

Thematic review of the 15 published further investigations showed that failings in record keeping and information management was a theme common to all landlords. For 11 out of the 15 landlords, this amounted to systemic failure across multiple service areas.

The areas most affected in the further investigation reports were:

- repairs logs
- vulnerabilities and reasonable adjustments
- complaints handling
- inconsistent use of digital systems and software

The focus of this section is on how the evidence reviewed led to a finding of systemic failure and what recommendations we made to address it.

KIM and repairs

Systemic failure in repairs services is covered in more details in this report [on page 8](#). This section looks at how poor KIM has impacted the quality and efficacy of the repairs services provided by landlords subject to further investigation.

Reviewing upheld complaints about responsive repairs revealed issues with KIM in several further investigations. We looked into how repeat failings in our casebook may have common causes. Where we see evidence of these failings continuing unmitigated, we considered this a systemic failure.

Examples of how data quality issues with the repairs service presented in casework included:

- repairs incorrectly recorded as complete
- inaccurate information about the job, the household, and access requirements recorded on the system
- surveyors' reports not filed correctly and not accessible when needed
- residents having to retain and share information about the repair history to make up for landlord shortcomings
- repeating jobs or appointments raised for the same issue

Several landlords experienced data quality issues affecting service delivery, which led to findings of maladministration. A common example was jobs being incorrectly recorded as complete, which causes frustration and delay to resolution.

Another common issue was inadequate information about the job being stored on the database, leading to operatives arriving without necessary equipment or access.

We often commented on how the burden of sharing information and progress was placed unfairly on residents, who were then inconvenienced by delays and further appointments.

In some cases, surveyors' reports were not available when needed to inform further works as they had not been filed appropriately. The onus was on residents to retain and share information about repairs that were the responsibility of the landlord.

One landlord was inconsistently updating records in their system and not reviewing previous records for quality or relevance. Residents were frustrated when repairs were cancelled without explanation or the landlord had to ask for details of works already completed. In one case, a vulnerable resident reported having to repeatedly explain why a proposed repair would not be appropriate, despite having previously ruled it out as an option. As a result, we made repeated findings of maladministration.

We saw repeated examples of contractors keeping poor records of appointments, which led to operatives unable to gain access due to appointments not being made correctly. This delayed works and led to frustration for all parties.

Key learning for the sector

These examples illustrate how keeping accurate and up-to-date records of works completed, reasons for decisions, and other key information can go a long way to improve residents' experience and reduce complaints about services.

Findings of severe maladministration were often made where multiple failings combined in a case. For one landlord, we saw several cases with a combination of long and unexplained delays, poor record keeping, missed and duplicated jobs, repeat repairs for the same issues, and lack of progress updates for the affected residents.

The combination of failings produce inordinate delays, inconvenience and distress, leading to more severe findings when the complaint comes to us.

Existing customer complaints are a valuable resource for landlords to identify where similar failings have reoccurred, suggesting where attention is needed.

Data quality issues impede the efficacy and timeliness of repairs jobs, as evidenced in our casebook. On an individual basis, that constitutes service failure and we will likely

uphold such complaints. When similar mistakes are repeated across many jobs, teams, and systems, it suggests systemic failure.

One example of failing to grasp a systemic KIM and repairs issue related to ineffective appointments. While the landlord knew that data quality issues were contributing to a high rate of ineffective appointments, it had not undertaken any analysis of the reasons for or extent of the problem.

This prevented it from identifying the root cause of failure and making the needed improvements. Effective monitoring of service delivery issues requires that landlords collect data that captures operational functions and use it to measure quality and efficacy.

Where repairs records are kept appropriately and considered alongside stock condition data, they can be used to anticipate demand on services and inform proactive stock maintenance.

In our further investigations, we often commented on how some landlords failed to plan appropriately for regeneration and major works using information they should have had at their disposal. This led to findings of maladministration and to additional costs for landlords, due to temporary housing and worsening disrepair. At scale, the failure to anticipate risks and mitigations can cost landlords significant time and money. If stock condition and safety certifications are overdue or incomplete, we may raise the issue with the Regulator for Social Housing or request that the landlord self-refers.

Key learning for the sector

We made a number of recommendations for landlords to improve their KIM in regard to their repairs service:

- review record keeping practices in repairs logs, including how information about the household and the disrepair is communicated between teams and with external contractors

- develop a knowledge management framework to set clear expectations about what information should be recorded and shared by staff and contractors
- make sure that information-sharing protocols are in place with external contractors
- training for staff on how to use digital systems, especially when new software is procured
- monitoring of the effectiveness of digital systems, including quality assurance of previous entries and analysis of repeated failings

Vulnerabilities and reasonable adjustments

The Ombudsman defines vulnerability as:

A dynamic state which arises from a combination of a resident's personal circumstances, characteristics and their housing complaint. Vulnerability may be exacerbated when a social landlord or the Housing Ombudsman Service does not act with appropriate levels of care when dealing with a resident's complaint ... if effective reasonable adjustments have been put in place, the vulnerability may be reduced.

Our [Spotlight report on attitudes, respect, and rights](#) goes into further detail on how landlords can adapt services to meet the diverse circumstances and needs of their residents.

Information kept on vulnerabilities and reasonable adjustments was a cross-cutting area of systemic failure for 6 of the 15 landlords subject to further investigation. While treating residents fairly and with consideration of their circumstances is much broader than information management alone, this was an area where we frequently saw failings.

We saw evidence of failure to consider a range of vulnerabilities in our casebook, including:

- disability

- survivors of domestic violence
- children in the home or pregnancy
- reasonable adjustments or contact preferences

The Spotlight report sets out how upheld complaints about information management and vulnerabilities usually relate to key information not being recorded or information not being acted upon. This was reflected in the cases reviewed in further investigations.

When reviewing antisocial behaviour (ASB) complaints from a housing association, we found a pattern of the landlord either not identifying resident vulnerabilities and the risk of further harm, or not acting on the outcome of its risk assessments. In many of these cases the resident reporting the ASB was vulnerable, and in some cases the ASB evidenced was serious.

Where the landlord has taken vulnerabilities into account in its approach, for instance following a risk assessment or a request for a reasonable adjustment, this should be documented and filed in a way that is accessible for other teams and staff. Our Spotlight report highlights that vulnerability is a dynamic state, so needs (and therefore risks) may change over time.

In the most severe cases, we saw how disjointed systems, missing or incorrect records, and poor information retention practices combined to produce detriment to residents' health and wellbeing.

Information about the household should be considered holistically in the risk assessment, and referrals to safeguarding programmes should be made where there are concerns about safety and wellbeing.

Sometimes we identified a disconnect between policy and practice. For instance, the vulnerability policy of one landlord set out how the property team should work with the safeguarding team to share information about at-risk residents. However, when we requested evidence on how this was applied in practice, the landlord was unable to

provide it. There was no evidence available on how the landlord trained its staff on working with vulnerable residents, which suggested to us that it was not a priority.

For one landlord, a cyber-attack had compromised data on vulnerabilities and reasonable adjustments among other service areas. In our casebook, we saw evidence of how this was affecting residents. In one case, a survivor of domestic abuse had to repeat details of past abuse to staff as data had been lost. We found the landlord failed to evidence that it took reasonable steps regarding her vulnerability by risk assessing and acting on the findings of this risk assessment.

While unforeseen events may compromise a landlord's digital systems, we found that remedial action had been unreasonably delayed and key service areas were affected.

On a similar theme, a landlord failed to keep up to date records about a resident's address and sent letters to a home that the resident had left because of domestic abuse. We commented that landlords need to be extremely careful when corresponding with survivors of domestic abuse and violence to ensure they do not inadvertently compromise their ongoing safety.

Another landlord told us how they had recently enabled operatives to make safeguarding reports on the repairs management software where they have concerns about a household they have visited.

This is a good example of how landlords can use digital systems to embed their approach to vulnerable residents across all service areas and ensure joined-up working across teams.

Key learning for the sector

The recommendations we made on vulnerabilities and KIM included:

- ensure that there is one single, accessible, source of accurate knowledge of residents' vulnerabilities and reasonable adjustments

- review policies on vulnerability, safeguarding and reasonable adjustments to ensure they are up to date with the law, statutory guidance, and the landlord's strategy
- ensure effective ways of recording vulnerabilities and support staff through training and procedure
- make adherence to the vulnerabilities policy part of service level agreements with contractors
- report on and analyse data on working with vulnerable residents to ensure quality and consistency
- factor vulnerability into risk assessments for disrepair or mould and record it appropriately

Complaints handling

There were many examples in our casebook where poor record keeping led to an initial complaint being raised by the resident, which was hampered by the poor record keeping.

The impact on multiple service areas illustrates how easily KIM becomes a systemic problem, with knock-on effects throughout the organisation that reduce the quality of the service provided to residents.

Records about residents, service requests, and the jobs raised to address them form an audit trail that the landlord should be able to use to evidence their actions and decisions. Where key evidence is missing during an internal complaints investigation, this is an indication that there is an issue with record keeping.

Where these complaints are escalated to us, we often uphold them as the records should be easily available.

Complaints being obstructed by poor KIM can lead to a further finding of maladministration on a case: one for the initial service failure, and another for the ineffective complaints investigation.

For one landlord, we found that poor record keeping affected more than half of the repairs complaints we reviewed, especially between the landlord and its third-party contractors. We also saw issues where the landlord's complaints file did not contain key information such as an agreement to provide a resident with quarterly statements. We identified a process issue: while staff received training on how to use the system, there was less guidance on what information to enter into it. The landlord was habitually failing to record key facts and promised actions from telephone conversations, leading to delays and complaints, which were in turn impeded by the initial poor record keeping.

Some landlords were repeatedly unable to provide evidence when requested by us. Some did not have evidence relating to individual complaints or to policies or actions in our further investigation evidence request.

This is a key marker of something going wrong with record keeping and file storage, suggesting root cause analysis of the issue is necessary.

Key learning for the sector

We made recommendations relating to KIM and complaints, including:

- train staff about what good record keeping looks like, in particular how to document conversations, assessments, action plans, and the reasons for decisions
- implement quality assurance processes

Using digital systems effectively

Individual examples of data entry issues may be identified in a review of complaints brought to us. However, wider consideration of how systems and processes contribute to errors is necessary in order to pinpoint the cause of systemic issues. To understand this broader context, we ask for evidence relating to how digital systems are being used in an organisation.

This might include:

- relevant policies and procedures
- a walkthrough of key digital databases
- conversations with staff
- training materials

This helps to build a holistic picture of how a landlord uses digital systems. These sources of evidence are considered alongside our casebook. We often saw issues in how digital systems worked, for instance in filesharing, case management systems (CMS) or customer relations management (CRM), data sharing with external contractors, and quality assurance.

For one large landlord, we saw no evidence of protocols or systems in place to share data on resident vulnerabilities with external contractors. This reduced the likelihood of operatives being able to respond to residents' needs and circumstances at appointments. Landlords' responsibility to consider reasonable adjustments and safeguarding for their disabled and vulnerable residents extends to their third-party operatives, so we expect landlords to have data sharing systems and protocols in place.

In another investigation, the CRM was not being used consistently by the repairs team and other colleagues. An independent review had previously highlighted this as an issue, describing how the shortfall reduced the landlord's ability to pinpoint service delivery issues. The landlord's evidence submission suggested the issue was persisting, as did our casebook.

One of our recommendations was to provide training on use of the CRM and to establish a process for ensuring quality of records. The landlord told us it had expanded the use of the CRM to all teams and had a renewed focus on quality.

Some landlords were habitually relying on ‘workarounds’ to deal with inadequate digital systems. We saw examples of actions being tracked on spreadsheets or in locally saved files, both of which led to delays where files were incorrect or inaccessible.

For one landlord using a spreadsheet to track damp and mould actions, an internal audit found a large number of incorrect dates and missing fields. We also heard from staff how the complaints webform was not pulling through to the CMS accurately, which meant that information had to be manually entered.

In another investigation, staff told us how they had to input data into several different spreadsheets and databases in the absence of a centralised system, creating many opportunities for human error.

We saw a clear example of how policy and systems can interact to produce perverse incentives, potentially reducing the effectiveness of a landlord’s actions. A local authority landlord had a repairs system interface that only included ‘completed’ or ‘refused access’ options, with no option to raise a follow-up or additional trade appointment. At the same time, it operated a performance bonus scheme that rewarded operatives based on volumes of jobs completed.

We saw many examples of delays to repairs and repeat appointments for the same issue, suggesting that the repairs interface was impeding the effectiveness of the service. Landlords should seek to understand how the user interface of their software meets the needs of service provision – complaints can be a valuable insight into how well services function in practice. Following our engagement with the landlord, the bonus policy was withdrawn and the landlord reviewed the functions of its digital systems.

Across many further investigations, we commented on how misuse of digital systems reduced the quality of the service residents received.

Professional case management software that reduces the need for manual duplication and offers improved facilities for analysis and insight. Procuring or building the right system is paramount to providing a quality service to residents.

The right software is not enough by itself – it must be used correctly and consistently to make sure that the landlord gets the full benefit of effective knowledge management. This involves creating a culture where mistakes are sought out and corrected. Embedding review and quality assurance mechanisms allows for reassurance that the data is reliable. From this virtuous cycle of data collection and maintenance, insight can be generated about service weak spots, repeat failings, and approaching risk.

Key learning for the sector

To enable effective use of software and systems, we recommended that landlords:

- set expectations for effective use of software and consider it in performance management of staff and contractors
- monitor effective use of software through exception reporting
- develop plans for data recovery in the event of a data loss or breach
- plan for the rollout of any new software, including training and transitional arrangements

Governance and oversight

To some degree, most examples of systemic failure we identify in further investigations constitute a failure of governance: where issues reoccur and processes fail, action should be taken to address shortcomings. In the best cases, we heard how landlords had already identified weaknesses and were creating strategies to address them.

In the most concerning cases, landlords were unaware of the extent of problems or their proposed solutions failed to address issues at their root causes.

Good governance and oversight of landlord's functions includes aspects such as:

- leadership and accountability
- strong data and performance frameworks

- including resident voice
- learning from insight and evidence

Other aspects of governance sit primarily within the remit of the Regulator of Social Housing. The [Regulator's grading](#) considers board effectiveness, compliance with legal and regulatory requirements, risk management, and the ability to protect assets and deliver outcomes for tenants.

However, there is a substantial overlap with complaints and resident experience in that poor management of a landlord's core functions has an impact on the service received by residents, which is visible to us through individual complaints and further investigations.

While the symptoms of ineffective governance may be visible in individual complaints through delays, poor quality complaints handling, or management of substantive issues, we take a broader look at a landlord to understand where the systemic failure results from.

Examples of evidence for evaluation of governance in further investigations included:

- data reporting, including choice of metrics and data quality
- policy and procedure
- board meeting minutes
- reporting frameworks
- resident views

In further investigations, we do not single out individual staff or their actions. The focus of the investigation and report is on the structures and processes that may impede the smooth functioning of the landlord. This section looks at examples of how systemic issues with governance and oversight presented in investigations and what recommendations we made to improve them.

Leadership and accountability: setting a positive culture

Our Complaint Handling Code expects that leadership and management will contribute to a positive complaints handling culture. This is experienced by residents as a complaints process that is accessible, reliable, and effective. Within the landlord, it looks like distinct lines of reporting, ownership of services, and clear standards.

We frequently commented on the organisational culture that we observed during further investigations. Some landlords were undergoing periods of change where leadership wanted to instil a new culture, while others had issues achieving objectives already in place.

Some complaint investigations suggested issues with blurred lines of accountability, where residents had to navigate opaque team boundaries within the landlord to get updates on their case. For one landlord, we commented on how residents had reported similar issues for several years and the landlord had been complacent about the poor service and continuing delays.

Clear lines of responsibility are also important when working with third parties. We commented on how one landlord failed to oversee the progress of works undertaken by contractors. We said that it is the landlord's responsibility to ensure that it is meeting its responsibilities to undertake repairs for its residents, within a reasonable time, and therefore the landlord's responsibility to manage the performance of its contractors to do so.

One landlord made significant changes to the structure of its leadership team during our investigation. Operational and strategic responsibilities for housing were split out into separate roles, which allowed for clearer accountability and more effective challenge. While we cannot order or even suggest that landlords make changes to leadership roles, this example illustrates how the structure of an organisation can enable good leadership.

Policies and procedures are a vital part of setting expectations and standards for staff throughout the organisation. For some landlords, key policies were missing or had not been reviewed or updated in several years. For these landlords, we supported management to identify where these shortfalls posed risks for residents and the landlord itself.

For other landlords, the policies in place were adequate but not adhered to in practice. Where resources were severely stretched for one housing association, staff found it increasingly difficult to follow policies and procedures, let alone consider training or improvement. We found that this contributed to a decline in professionalism by staff, evidenced in upheld complaint investigations across multiple service areas. Many staff were trying to reach standards of professionalism but were let down by inconsistencies.

Key learning for the sector

Policy, procedure, and guidance need to be embedded across teams and levels of the business to ensure consistency in the service provided. It falls upon leadership and management to identify these policy gaps and take steps to address them.

Where landlords are undergoing structural changes, for instance during a merger or bringing an ALMO in-house, this is a time for careful planning and risk management by leadership. In one investigation, we commented on how merger planning had focused on the financial and governance aspects, but had failed to consider the experience of residents fully. This had a negative impact on residents who received a poorer quality of service.

One landlord told us it had started carrying out more case reviews as part of a renewed focus on leadership and accountability. This included checking that repairs had been completed and assigning senior staff to be a link with residents during works. It said that learning from complaints had underpinned reviews of its complaint handling structures, processes, and culture.

Strong data and performance frameworks

Key learning for the sector

Reporting to the board is a vital pathway for operational information to be made visible to leadership. Where we saw this reporting fall short, it meant that landlords struggled to make sense of their own services. This prevents weaknesses being identified and improvements being made. Getting reporting right means measuring the right things and seeking out new information where there are gaps.

For one landlord, we looked at the metrics they selected when reporting to the board. It used the same metrics in presentations to us at the start of our further investigation. We found that some of the measures were not appropriate for the conclusions drawn and were in some cases based on unreliable data.

This had a direct impact on the board's ability to understand the landlord's performance accurately. Without transparency in reporting, the board cannot effectively challenge management.

Similarly, in another investigation the landlord acknowledged it had a backlog with repairs. It ringfenced those repairs and reported performance improvement to governance. The information with governance was incomplete because it did not report on a new backlog that had started outside this ringfence.

At another landlord, we commented on how it was failing to collect data on or analyse reasons for ineffective and missed appointments. The landlord had a high rate of ineffective appointments and our casebook suggested that the landlord was often at fault. Without a strong understanding of the causes for ineffective appointments, we expressed concern that any remedial measures would fall short. Without visibility of the extent of the problem, capturing through record keeping and reporting, the landlord may be unable to address it effectively.

Informal complaints handling was another common source of opaqueness in reporting. Non-compliant complaints handling is covered in more detail [on page 17](#).

Without the correct complaint stages and escalation processes in place, leadership can have a skewed view of the efficacy of services. This is a requirement of the Code and will support landlords in understanding residents feedback in full.

Key learning for the sector

To support strong data and performance reporting and evidence-based decisions, we recommended that landlords:

- make SMART improvement objectives: **S**pecific, **M**easurable, **A**chievable, **R**elevant, and **T**ime-Bound
- produce a performance reporting framework to ensure relevant scrutiny and oversight functions receive transparent, accurate, and insightful information and data
- embed processes to utilise insight from complaints to drive positive change
- ensure accuracy of management information, including steps to monitor accuracy of data across core systems and transparent reporting to governance

Including resident voice

Residents are a valuable source of feedback for landlords. During our further investigations, we heard directly from residents at ‘Meet the Ombudsman’ events and at meetings arranged during site visits.

Where landlords were failing to consider residents’ views in their planning delivery, we commented on how residents were feeling left behind or ignored.

There were multiple positive examples of landlords putting in place resident panels or similar opportunities for involvement. For instance, one landlord founded a Customer Experience Oversight Panel, which meets 6 times a year to find local solutions to problems raised by residents and constructively challenge service managers on recurring complaint themes. The activities of the Panel are published on the landlord’s website.

One landlord shared a note from a meeting of its Customer Scrutiny Panel. It described how resident panellists felt that apologies from senior leadership lacked empathy and had a 'corporate tone'. In an apology written following receipt of the note, we commented that the letter read as sincere and was more specific about problems and next steps. This is a strong example of how feedback from residents can be directly applied to improve resident experience.

The key takeaway from the further investigations is that engagement with residents needs to be embedded in decision making if it is to have the desired effect. Further information can be found in our [apologies guidance](#).

Learning from insight and evidence

Key learning for the sector

Landlords should be able to learn from complaints. This is a broad set of interrelated activities that should form a virtuous circle:

- using individual complaints as a source of feedback
- identifying themes, trends, and root causes through data analysis
- taking action to embed improvements and provide the best service for residents

This section looks at how leadership and management should integrate insight from data and evidence into improving services. There is more detail about knowledge and information management [on page 21](#) and in the previous section on data and performance management frameworks [on page 36](#).

One landlord told us it was making headway in carrying out a full stock condition survey of its homes. This information had been incomplete since the ALMO had been brought in-house years before. The landlord identified that this was a source of repeat issues with disrepair and planned to use the review of properties to decide where investment into major works should be concentrated.

While it took a long time to get to that point, it is commendable that the landlord was making plans to integrate knowledge about its stock into decision making at the highest level. We recommended that the landlord couple this project with broader development of its data frameworks to ensure that information is retained and useable.

For some landlords, systemic change did not happen until the landlord was prompted by external bodies. Across multiple investigations, we commented on how the Information Commissioner's Office, the Regulator of Social Housing, the Local Government and Social Care Ombudsman, and ourselves had to get involved before the landlord acted to resolve service failure.

In one instance, we said that the landlord appeared to 'lack intrinsic motivation' to resolve issues and prevent reoccurrence. This is costly for the landlord in terms of time and resource and certainly contributes to a poorer service received by residents. We encourage landlords to use the information already at their disposal to understand where repeated failings are having a great impact on residents.

One landlord told us it had commissioned independent academic expertise to support its damp and mould strategy. The university partner planned to provide 3 research papers, which the landlord will share with other organisations. This is a great example of making use of expert advice, embedding it, and sharing the learning for the greatest possible impact.

Other landlords commissioned work internally to similar effect, through 'rapid reviews' or 'mystery shopper' exercises which gave management insight into how well processes work in practice.

Looking to the future

Since publication of the further investigation reports reviewed for this report, we have changed our process for further investigations.

In 2025, the Ombudsman evolved the way it conducts special investigations, introducing a tiered approach. This means more landlords are engaged earlier in the issues we

identified, with the publication of further investigation reports reserved for landlords where service failings persist. So far 18 landlords have been engaged in this tiered approach. We publish details of the landlords engaged and the lessons they have identified on a 6 monthly basis. More information on the process can be found on our [website](#).

Root cause analysis

In recognition of the greater emphasis placed on landlords ability to conduct root cause analysis, we are offering free Continuing Professional Development (CPD) training.

We are providing an introduction, intermediate, and advanced course on root cause analysis, available to all member landlords from autumn 2026.

Further reading

Reports and guidance available on the Housing Ombudsman website:

- [Annual Complaints Review](#)
- [Learnings from severe maladministration reports](#)
- [Centre for Learning](#)
- [Spotlight report on knowledge and information management](#)
- [Follow up: Spotlight report on knowlegde and information management](#)
- [Spotlight report on attitudes, respect, and rights](#)
- [Spotlight report on repairing trust](#)