

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

For the period from 1 October 2025 to 31 March 2026

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. This is her third report.

Service complaints during the period

This report covers service complaints closed during the period 1 October 2025 to 31 March 2026. 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 1128 service complaints at stage 1 and 46 at stage 2.
- It upheld or partially upheld 745 service complaints at stage 1 and 35 at stage 2.

The total of service complaints investigated and closed at stage 1 and stage 2 (1174) represents ... per cent of the enquiries and complaints received by the Ombudsman during same period (29,431).

Sample selection

The Ombudsman selects cases for review in each six-monthly period. For this review period, 12 cases were selected at random, of which I reviewed 10.

Report

1. This is my third report since my appointment as Independent Reviewer. I have reviewed a small sample of service complaints, and I am satisfied that the service complaints process is operating effectively. My observation is that Service Complaint Investigators (SCIs) continue to handle their investigations empathetically and take great care to explain the reasons for their decision.
2. I was given access to 12 service complaint files, which I have numbered 1 to 12 for ease of reference. I reviewed 8 of the 10 Stage 1 cases, and both Stage 2 cases. (I did not include case 6 or case 10 in my review.)
3. I raised several queries following my initial review of the service complaint files, including questions about the process for investigating landlord complaints and service complaints, other cases related to the sample cases, and the current status of some of my previous recommendations. All of these queries were answered promptly and helpfully.

Analysis of cases

4. The service complaints were categorised on their case cards as follows (some complaints fell within more than one category):
 - “communications”: 6 complaints
 - “case management”: 4 complaints
 - “managing relations”: 4 complaints (case 1, which was recorded as a “managing relations” case, was in fact about adjustments made to help the resident with a disability to engage with the Service)
 - “failure to follow process”: 4 complaints
 - “delays”: 3 complaints
 - “reasonable adjustments” or “EDI/human rights”: 2 complaints.
5. In each of the 10 cases, the resident (or in one case their representative) had a declared mental health condition or impairment that was relevant to their complaint, and that affected how they were able to communicate with the Service. Case 1 also involved an allegation of homophobia and case 7 related to a landlord complaint involving allegations of racial discrimination.
6. Six of the 10 Stage 1 complaints, and 1 of the Stage 2 complaints, were upheld or partly upheld. In every case the resident received either an apology or an explanation, or both. In 2 cases, including 1 of the Stage 2 cases, the resident received some compensation.

Timeliness

7. I understand that the Service introduced a new Enquiries function in January 2026. This, together with ongoing high workloads and the rapid expansion in the Service's casework teams, has led to a corresponding increase in the number of service complaints referred to the Customer Insight team. The increase in service complaints put pressure on the Team's ability to meet the timescales set out in the Service Complaints Policy. The Service is continuing its significant recruitment programme to manage the increase in landlord complaints and service complaints and has refined the way it trains up new case-handlers. Getting new case-handlers up to speed takes time and so this casework pressure is likely to continue for a while.
8. There were some issues with the timeliness of the cases in the sample that I reviewed. 4 acknowledgements were sent late. Stage 1 responses were sent late in each of the 10 cases I reviewed. Most were a few days late, but 4 were between 2 and 4 weeks late. One of the Stage 2 responses was also sent late. The change to the Enquiries function in January 2026 may have been a factor in 5 of those cases.
9. In 3 of the cases where late acknowledgements were sent, the dates were incorrectly entered on the case record. The information recorded on the case record is quality checked (by sample) and is used by the Service to monitor performance against the timeframes set out in the service level agreements which, in turn, could impact decisions on resourcing. I have drawn attention to the importance of accurate data entry previously and made a recommendation (see Recommendation 1, [Report for the period from 1 April to 30 September 2025](#)) That recommendation is currently being implemented. I therefore make no further recommendation.
10. Some of the service complaints were about poor timeliness, and compensation was awarded in 2 cases. I consider compensation below (paragraphs 43 to 46).

Case closure

11. I was asked to look at whether the cases I reviewed had been effectively concluded at the end of the service complaints process.
12. All the residents who brought these service complaints experience mental health problems or impairments affecting how they communicate. In each case, the resident was evidently finding the process of complaining challenging, frustrating and stressful, and this affects how they communicated with the Service. This is reflected in the case categories for these complaints, with many of the complaints categorised under "communication", "managing relations" and "case management". It is not surprising, therefore, that in service complaints of this nature, it can be challenging to bring communication to an end.

13. Case 1 was not closed down effectively. In this case, the resident cannot read or write and experiences processing and memory difficulties. The adjustments in place for the resident include reading a summary of any decision to them over the phone. The resident has 2 landlord complaints and 6 service complaints. Case 1 and a previous service complaint from the resident related to calls with landlord complaint case-handlers. Neither service complaint was upheld.
14. The SCI tried to give the resident the outcome of the service complaint by phone, but the resident did not allow the SCI to explain the decision and the call was eventually terminated. The SCI closed the case after the phone call and (having discussed the case with a manager) recorded a note of their decision and their attempts to deliver it on the case file. The SCI did not issue a written Stage 1 decision.
15. It is clear that SCIs involved in this resident's complaints have tried to help the resident to navigate the investigation of their landlord complaints. In case 1, the SCI made a good attempt to move the resident's landlord complaint forward. But there is a repeated pattern of service complaints following calls where case handlers have given the resident information they are not happy with – for example about the length of time the investigation of the landlord complaints is likely to take. In one case, the resident accused a case-handler of homophobia because the case-handler explained that they could not investigate every part of the resident's complaint.
16. In my view, there are two steps that the Service could take to improve engagement with this resident, and residents in similar situations:
- 16.1. The Service could send the resident an audio recording of any decision, or important communication. The Service already does this in some cases, in consultation with the resident. The resident could then listen to the recording at a time convenient to them. Any subsequent communication with the resident would be on the basis that the resident had listened to the recording. The Service could decline to engage with the resident until they had done so.
- 16.2. The Service could require the resident to communicate through a representative, applying its managing behaviour policy. In my [second report](#) I recommended that the Service considers producing a public-facing behaviour policy in straight-forward language, to which any individual engaging with the Service can be referred. The Service is planning to produce an updated policy in the autumn. The current Managed Behaviour policy includes as a possible outcome of unacceptable behaviour that the Service can require communication to be through a representative. Case 1 might be the rare occasion where such a restriction would be appropriate.
17. Case 2 was brought by the resident's representative (a relative). This was the second service complaint relating to the way in which the Service had handled

the landlord's compliance with its orders. The Stage 1 response includes a clear account of the sequence of events. The service complaint was not upheld because the Service had followed correct procedures. The Service had correctly followed its review process when considering compliance. That process is designed to pick up issues with orders and worked effectively to do that in this case. The SCI apologised for confusion caused by a Complaint Handling Failure Order (CHFO) being issued "in error".

18. The representative also complained about confusion caused because the landlord complaint case-handler did not notify them that the CHFO had been rescinded until the case was closed. This issue had been subject to a previous service complaint that was upheld. The representative had raised the "new" issues in a Stage 2 request that was refused because the issues had not been raised at Stage 1. 11 days later, the representative raised a new service complaint (case 2).
19. The Service Complaints procedures say: "The purpose of the stage 2 process is to review the stage 1 investigation and response and investigate any potential new evidence that could impact on the stage 1 decision." The request to escalate to Stage 2 should:
 - "explain their reasons for their disagreement with the decision and:
 - set out any of the element(s) of the service complaint that we did not cover or missed
 - provide new, relevant information that would impact on our stage 1 response."
20. The Customer Insight team considered whether to raise a new service complaint or to close the complaint because the issues had already been considered. The team concluded that the issues raised were different to those raised in the first service complaint. There is logic to that approach, and it aligns with the Service Complaints procedures. But in my view there is flexibility within the procedures to have looked at the "new" issues under Stage 2, as "issues that we did not cover" in the Stage 1 outcome. Starting a new complaint, which then led to another Stage 2 request, extended the process for the resident and for the CI team. In my view, this could have been avoided if a pragmatic decision had been taken to accept the Stage 2 request and treat the "new" issues as an extension of the original service complaint.
21. The representative's request to escalate case 2 to Stage 2 was refused and that did bring the service complaint to an effective conclusion, although the representative remained unhappy with many aspects of the landlord complaint and how the Service had handled their concerns.
22. Cases 3 and 9 were brought by the same resident, who has a series of landlord complaints arising over a period of several years about the antisocial behaviour

of their neighbours. One of the resident's concerns was that their landlord complaints were being treated separately rather than dealt with as a whole, and this fragmentation meant that case-handlers did not have a complete picture.

23. Case 3 related to the Service not responding to emails that the resident had sent while the case was awaiting allocation. The Stage 1 outcome upheld the complaint that the Service should have responded to a question about process in one of the emails – and provided the answer to that question.
24. It does not appear that the resident asked to escalate Case 3 to Stage 2. The resident did, however, raise another service complaint in a month later, which was investigated and concluded in January 2026.
25. The resident raised more new issues in February 2026 that were dealt with as a third service complaint, and a Stage 1 outcome was issued in March. The outcome letter sets out clearly all of the resident's landlord complaints, and the stage each has reached. It acknowledged "that landlord complaints are rarely linear and often span several months or years, so it's important we address as much as possible." But it did not uphold the complaint, because the Service had correctly followed its processes and given information about the timeframes and issues it can investigate.
26. The resident responded:

"All issues raised are not new or isolated matters. They stem from an original complaint that has been ongoing for approximately close to 4 years in total and has never been properly resolved.

Instead of being addressed, these matters were retrospectively grouped into multiple case files and effectively left without meaningful action last year so it makes it seem the service hasn't had a serious complaint for an unreasonable amount of time."

This was considered as a request to escalate to Stage 2 and rejected.

27. These 3 service complaints were treated separately just as the resident's landlord complaints were. In my view, picking off these issues as separate complaints introduces unnecessary complexity. The resident has more people to deal with and more channels of communication to manage. Although the Stage 2 rejection seems to bring correspondence to an end at least on this service complaint, the resident still has 2 open landlord complaints, one of which has been accepted for investigation and the other is awaiting triage. So both cases are currently waiting for attention. I note that the older case has been risk assessed as "medium" risk, which means that the investigation is likely to take many more months to complete.
28. The Customer Insight team took a different approach in cases 11 and 12, the 2 Stage 2 complaints. In case 11, the resident has serious difficulties with their

memory. The complaint related to delays in handling 2 landlord complaints, a comment made by the case-handler in a phone call, and about delays in the service complaints process. The complaint was upheld and some compensation was offered for delays. The resident requested that the complaint proceed to Stage 2 on the basis that compensation offered was inadequate. This request was initially rejected because “we cannot escalate a complaint simply because the resident is unhappy or disagrees with the outcome.”

29. The resident’s agreed reasonable adjustments included a requirement that emails should only be sent at certain times of day. The resident had complained that case-handlers had not complied with this requirement several times. Unfortunately, the email rejecting the Stage 2 request was sent outside the agreed time parameters. The SCI apologised sincerely for the error. The resident complained about that, and their complaint was escalated to Stage 2 because it “related to the handling of your complaint”.
30. In case 12, most of the reasons the resident set out in their Stage 2 request amounted to a repeat of their Stage 1 complaints and therefore were not grounds for escalation to Stage 2. But the resident also complained about how the SCI had handled the Stage 1 complaint and about changes made to the agreed reasonable adjustments. These issues were both wrapped up as a Stage 2 complaint rather than being referred as a new service complaint. This was a sensible approach.
31. In my view, a pragmatic approach would be to try to capture as many of a resident’s service complaint issues in one service complaint, rather than treating each additional issue as a new complaint. So, for example, a resident might complain about delays on several different cases, about several missed call-backs, or about more than one telephone call, but each additional issue would be added to the existing complaint rather than treated as a new one. Issues raised long after the original service complaint had closed at Stage 1 would still need to be considered as a new complaint. But those raised during a service complaint investigation, or within a reasonable period of time of the Stage 1 outcome – particularly those raised as part of a Stage 2 request – could be dealt with under the umbrella of the existing complaint. By managing the service complaint issues in this way, the CI team would reduce the number of SCIs involved with the resident and could manage communications more efficiently. The Service Complaints procedures should be sufficiently flexible to enable this approach in appropriate cases.
32. In cases 5 and 12 the SCI re-engaged with the resident after the service complaint had been closed to discuss their reasonable adjustment arrangements. The CI team has overall responsibility for the Service’s reasonable adjustments policy (which applies across the Service) and so it is sometimes best placed to support the resident by ensuring that appropriate adjustments are agreed and implemented across the organisation.

33. I can see that this approach is helpful where the resident has complained about adjustments or how they have been implemented, so that the CI team can ensure that adjustments are implemented effectively across the organisation. However, it does mean that the door is sometimes opened again after a service complaint has been concluded. Referring these further discussions to another colleague might make it easier to manage attempts to reopen a service complaint that has been concluded.

34. I **recommend** that:

34.1. The Service should consider whether, to make the Service more accessible, it should issue recordings of decisions and other important letters in appropriate circumstances, including where the resident has not requested it.

34.2. The Service should consider its approach to grouping service complaint issues. Relatively minor additional issues that are raised while an existing service complaint is being investigated, or soon after the Stage 1 response, could be managed and resolved under the umbrella of the existing service complaint.

Reasonable adjustments

35. In case 5, the resident's service complaint was about lack of communication while their 4 landlord complaints were awaiting allocation at different points of the Service's process. Correspondence raising a new issue with the landlord had been put on an existing complaint file and not picked up because the complaint was waiting for allocation to a case-handler. This caused a delay. The resident said that not being able to speak to a case-handler exacerbated their mental health difficulties because they could not clear up confusion. The resident was also concerned about the different issues being treated as separate complaints rather than as a whole. They asked for all the complaints to be merged and managed by a single point of contact.

36. The stage 1 service complaint response was unusually long because it included a summary of all the complaint issues and the status of each of the landlord complaints. The SCI had clearly taken a great deal of care setting everything out clearly. Because the letter was so long the SCI helpfully included a summary of the letter in the covering email. The outcome letter explained that it was not practical to appoint a single person to oversee all of their cases because "caseworkers all have different expertise, depending on the area they work in. There isn't one single person who would have all the skills and knowledge needed to progress your cases from beginning to end." It also explained that transferring calls to a case-handler or manager is not always possible "because

we can't always guarantee their availability for calls, as they have so many residents to speak with and other diary commitments to stick to."

37. The letter explains "... we need to balance requests for reasonable adjustments with the impact they have on our day-to-day work." It concludes:

"I realise this may all sound very negative, which isn't my intention. I'm trying to explain the reasons behind us being unable to agree to the adjustments you've asked for.

But that doesn't mean we can't consider other ways to help.

I'd be more than happy to chat to you about this, so we can discuss what you need and how we can agree practical steps to get there."

38. The letter provides a good explanation of why the adjustments that the resident was asking for are not practical in the Service's context, and therefore not reasonable. But the resident was unable to engage with the letter. The SCI answered some of their questions about the current situation, summarising again the Stage 1 outcome. There was then a gap of over two months before the resident came back to the SCI asking for a phone call to arrange reasonable adjustments. It proved difficult to arrange a call, and the SCI was still in communication with the resident trying to arrange a call over three months after the end of the service complaint process had concluded.
39. In case 12, the resident has very complex support needs and their service complaint included a complaint that the Service was not meeting their communication needs. The resident required phone calls before emails were sent out so that they could discuss the email and ask questions. But sometimes the resident is not able to answer the phone and so calls have to be rescheduled. These requirements are challenging for a Service that is under considerable work pressure. In addition, the resident often demanded to speak to the line manager of the case-handler or SCI dealing with their complaint, and to change the case-handler or SCI if they disagreed with what the case-handler or SCI were telling them. These requests were quite reasonably refused.
40. None of the aspects of the service complaint was upheld at Stage 1 or Stage 2. The Stage 1 outcome sets out a full explanation of why, in each case, the SCI had concluded that calls were handled appropriately, and the resident's requests were not agreed. The SCI put in place a "communication commitment" that set out the adjustments the Service would make to the way it communicated with the resident, and the Service's expectations of the resident. This is very clearly and reasonably explained to the resident.
41. In this case the resident was given a named single point of contact at each stage of the Service's process. This is a helpful innovation introduced partly in response to a recommendation in my [second report](#) (recommendation 4). I encourage the Service to take this innovation further. I recommended a single point of contact or

specific resource that is consistent throughout the process. This point of contact need not manage the case themselves but can act as a communication conduit. An element of distance between the point of contact and the casework function might be more effective, and make it easier for the point of contact to shepherd the resident through the process end-to-end.

Compensation

42. The Service Complaints procedures include a guide for SCIs when considering awarding compensation for service complaints. The guidance is deliberately light touch, and SCIs are encouraged to discuss remedies with other members of the CI team.
43. In case 7, compensation of £100 was awarded for not responding to a specific email, for unclear communication about waiting times, and for exceeding the 12-month timeframe in one case.
44. In case 11, the resident was offered £25 for the delay in acknowledging the service complaint and investigating it. The timeframes were missed because of unexpected staff absences. No compensation was offered for a comment made during a phone call between a case-handler and the resident about their memory issues, although that complaint was upheld. The case-handler offered a very sincere apology. At Stage 2, the compensation was increased from £25 (for the service complaint delays) to £100. The reason for the increase in compensation is not clearly explained in the Stage 2 decision, but it appears to relate to the SCI's error in sending an email at a time that was outside the parameters set out in their agreed adjustments (see paragraph 29, above). The SCI ruled out increasing compensation for other aspects of the complaint in their decision letter.
45. The awards of £25 compensation for delays of a few weeks in the service complaints process, and £100 for exceeding the 12-month timeframe for investigating landlord complaints (which compensation was also for two other failings) do not appear to be proportionate to each other. Although in each case the Service has exceeded the timeframes it sets itself, exceeding the already lengthy timeframe for completing the landlord complaint seems the more serious breach. There may be other factors that have influenced the level of compensation in this case but, if so, that is not explained in the Stage 2 decision. SCIs may benefit from some further guidance on when to award compensation, how much to award, and how to explain the reasons for the award.

Frontline team and outbound calls

46. In case 5, the resident had 4 live landlord complaints at different stages with 4 different case handlers, about the same, ongoing, issues. The resident has mental health difficulties and says that they often feel overwhelmed by their complaints and the HOS process. Part of the service complaint was that the 4

complaints were becoming confused. The resident, who had been trying to resolve the apparent confusion between their cases, had a call to frontline staff terminated because of a “system error”. The Stage 1 response says, “Our front-line staff can’t provide an outbound call service, so there was no way they could have returned your call. I do appreciate how disappointing this would have been for you.”

47. I asked for more information about call-handling. The response was as follows:

“HGS [the service that provides this enquiries function] do have the ability to call out [ie to make outbound calls]. I don’t think it is unusual for calls to drop, particularly where there are signal issues at the resident’s end. Often residents will call us back. The only time HGS will generally call back from a dropped call is where there are (for example) immediate safeguarding concerns, and we were not able to get all the details needed.

From recent insight data, 13% of calls dropped at some point in the call. HGS wouldn’t be able to manage all contact channels within SLA if they returned every dropped call. The average call handling time is 9 minutes.

So, from our perspective, while in theory they do have the ability to call out, staff are not expected to call back. And would not have the capacity to do so.”

48. In this case, the call was from a resident with mental health issues who was struggling to manage several live complaints. I accept that resourcing pressures mean that it is impractical for HGS call handlers to return every call that is terminated. However, it would, in my view, have been good practice to have at least asked one of the 4 complaint handlers – or a member of the CI team – to return the resident’s call, or perhaps send a follow-up email.

Conclusions

49. This sample of service complaints demonstrates that the CI team is coming under increasing pressure because of the increase in service complaints, and the level of frustration and stress that residents bringing complaints are evidently experiencing. I have made two recommendations that I hope will help the Service to manage this pressure. I have also identified some other issues for the Service to consider but have not made formal recommendations because these issues may be isolated instances.

50. This small sample demonstrates that the service complaints process is operating effectively, albeit with some timeliness issues. SCIs handle their investigations empathetically, and outcomes are generally reasonable. In several of the cases that I reviewed, the SCI have gone to considerable lengths to try to help residents, for example by untangling multiple different complaints, and explaining

what is happening on each one. This will undoubtedly help those residents' future engagement with the Service.

Recommendations, actions and responses

No.	Recommendation	Action	Owner(s)	Delivery date
1	The Service should consider whether, to make the Service more accessible, it should issue recordings of decisions and other important letters in appropriate circumstances, including where the resident has not requested it.	Consideration around adding recordings of decisions as an option to our suite of existing adjustments, supporting access to the Service.	Linda McMillan Justin Crittall	31.10.26
2	The Service should consider its approach to grouping service complaint issues. Relatively minor additional issues that are raised while an existing service complaint is being investigated, or soon after the Stage 1 response, could be managed and resolved under the umbrella of the existing service complaint	The Service Complaint Policy and associated ways of working will be reviewed Q3-4 (new director in post) and updated as required Where a service complaint is active and additional service complaints are received, team will review root causes and consider combining as relevant.	Linda McMillan	31.3.27