

Business Plan 2021-22

Consultation document

Published 24 November 2020

Closing date 22 December 2020

Foreword

This business plan comes at an important moment with the publication of the Government's Social Housing White Paper, the continued challenge of Covid-19 and our ongoing transformation programme. It sets out the next steps to change, grow and improve our service, and invites your thoughts on some key questions which will help to shape our future development.

Everyone has been dealing with the challenge of Covid-19 in their lives and work. The pandemic has demonstrated the importance and value of the social housing sector. For the Housing Ombudsman Service, it has meant implementing our new operating model whilst working remotely but we have done so to the timescale we committed to at the start of this year. During the strict lockdown we sought not only to maintain our service, something we believe is critical given the role complaints can play identifying unseen problems, but also improve our performance as we set out in our current business plan.

There has been strong interest in our growth plan with almost 2,500 applicants for vacancies and we have welcomed many new colleagues during the year. I am immensely proud of our committed, diverse and talented team and we will continue to do all we can to support colleagues' well-being as the consequences of the pandemic and this challenging operating environment continue.

Our service has made solid progress towards the goals set out in our corporate plan. Our average determination rate continues to reduce while quality and positive customer feedback have been maintained, and we have redesigned our organisation to deliver the commitments we made on accessibility and promoting positive change. The focus for the coming year will be embedding these changes. We expect our subscription rate, which increased to support these improvements last year, will remain unchanged in 2021-22.

The White Paper makes clear the importance of our service within the social housing sector and emphasises other significant changes to our powers and role. This year has seen major changes with the introduction of the revised Housing Ombudsman Scheme, the Complaint Handling Code, systemic powers and legislative proposals to remove the 'designated person' filter. The White Paper sets out areas for further change. This includes closer work with the Regulator of Social Housing as part of strengthened consumer regulation, raising awareness of redress and supporting the development of the Access to Information Scheme. Next year will be critical for making progress against these objectives. To support this, alongside our extensive

engagement with landlords, a new Resident Panel, comprising of 100 residents from across England, is being launched by us to provide important feedback as we evolve.

Our plans to promote openness and transparency around complaints are also gathering pace. This is a key part of promoting learning when things go wrong, a major focus for our service. As part of this consultation, we want to hear your thoughts on how we can develop our sector engagement work, promote learning and raise awareness of the role of our service and redress.

I look forward to your comments.

Richard Blakeway
Housing Ombudsman

How to respond

We are seeking your feedback on three questions set out in the document. The consultation is available [online](#) which is the preferred method of response. Alternatively you can:

- email your response to consultations@housing-ombudsman.org.uk
- post it to Communications team, Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ

The consultation is open for four weeks until **5pm on Tuesday 22 December 2020**.

We will publish a document summarising the responses at the same time as the final business plan 2021-22. It will include the names of the organisations that have responded, but not individuals.

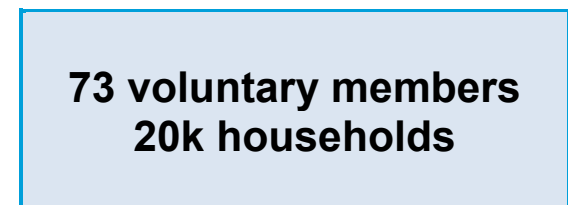
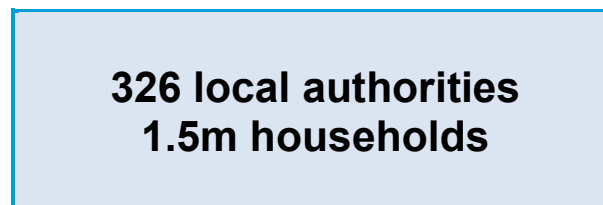
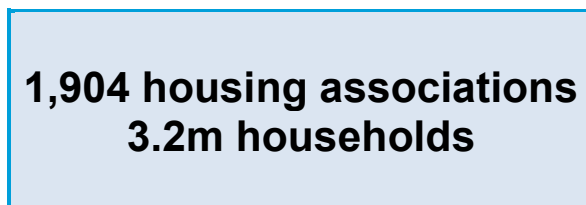
Thank you for participating.

Our work

Our role is to:

- ▶ **Make the final decision on disputes between residents and member landlords. Our decisions are independent, impartial and fair**
- ▶ **Support effective landlord-tenant dispute resolution by others, including landlords themselves, and promote positive change in the sector**

Our members:



Our impact

In 2019-20:



We dealt with 15,832 complaints and enquiries



We determined 2,138 cases in our formal remit



38% of complaints were about repairs – the largest category



Average case time for determinations reduced to 5.8 months from 6.7 the previous year



95% of orders were implemented by landlords within three months



100% of cases determined within 12 months



Residents benefited from 2,617 orders and recommendations



We ordered landlords to pay a total of £412k compensation

Our plans for 2021-22: responding to the White Paper

The Government's publication of the Social Housing White Paper is a significant moment for the social housing sector. The paper makes clear the importance of the role redress performs within housing and is another step in the evolution of our service. This evolution started with our 2019-22 Corporate Plan, shortly after the publication of the Social Housing Green Paper, and the 2021-22 business plan seeks to reflect some of the forthcoming changes set out in the White Paper.

The White Paper sets us the twin priorities of building an effective relationship with the Regulator for Social Housing (the Regulator) and raising awareness of our service directly with residents. Confidence in our service and the progress we have made is recognised through the commitment to consider strengthening our powers if required and the proposed expansion to our remit to decide reviews under the Access to Information Scheme.

Closer working with the Regulator

We have begun to work more closely with the Regulator and our revised Memorandum of Understanding significantly increases the areas where we may refer or notify them of our work. The Memorandum also builds on the sharing of information between the two organisations. The Ombudsman will shortly publish a framework for conducting systemic and thematic investigations, with the potential to refer suspected systemic failures to the governing body or ultimately, if we are unsatisfied with the response, the Regulator.

During 2021-22, we will continue to build the relationship with the Regulator to ensure our referrals and notifications support an effective system of accountability in social housing.

Raising awareness of our service

We believe that raising awareness of complaints is fundamental to improving service excellence for all social landlords. Every resident with a social landlord should be aware of our service and understand the impact it can have. The Ombudsman has increased its engagement activities – for instance, around 1,000 people have participated in webinars on the Complaint Handling Code. But we want to go further. To realise this ambition, we will use the dual approach of Ombudsman and landlord hosted events to maximise our reach.

Ombudsman-led engagement will be through the creation of a Resident Panel. This Panel will consist of 100 residents and will seek to be representative of our member landlords whether housing association, council or co-operative, rural and urban. It will provide feedback on major pieces of work (eg our next corporate plan), on thematic reports and on Panel members' experience of using our service.

Additionally, we will be inviting landlords from across England and reflecting the breadth of our membership to host quarterly 'Meet the Ombudsman' events. This will provide an opportunity for their residents to discuss the lessons identified in our latest published Insight Report with the Ombudsman and his team. These will initially be hosted remotely due to Covid-19 restrictions but will switch to face-to-face events as soon as this is possible.

Question 1: Do you have any comments on our approach to raising resident awareness of the role of our service and redress?

Expanding our remit

The White Paper proposes an expansion to our remit to decide reviews under the new Access to Information Scheme. We will work with the Ministry for Housing, Communities and Local Government and the Regulator for Social Housing during the year to develop our role which will be resourced by a new and dedicated team.

Changes in response to Covid-19

We have all been responding to Covid-19 in our lives and work. Its impact will continue to be felt during 2021-22. Our service was maintained without interruption when the first lockdown was announced in March 2020.

We engaged widely with landlords when restrictions were introduced and reacted swiftly to the impact of these on landlords by publishing best practice guidance on complaint handling during Covid-19 on our website in April 2020 and updating this in July. We have also hosted or participated in numerous webinars to share our advice with the sector.

Casework impact

The immediate impact of the lockdown on us was a sharp drop in the volume of enquiries and complaints received but this has steadily recovered and at the half-way point in the financial year, in-month volumes are now comparable with the prior period last year.

We expect volumes to continue to rise due to on-going local and national restrictions during the rest of this year and into 2021-22. We also expect complaints to become more complex as the landlord's actions in the light of Covid-19 will need to be investigated alongside the complaint itself. We have identified a cohort of Adjudicators who will specialise in these cases to ensure consistent and expert decisions during 2021-22.

Colleague impact

As with many organisations, the enforced move to homeworking has caused a fundamental shift in how we interact with colleagues. Many activities successfully moved online including the significant recruitment needed to support our new operating model and subsequent colleague inductions. We have focused on opportunities to bring colleagues together with fortnightly breakfast briefings which give a platform to a range of colleagues, activities and external speakers, and hosting two virtual colleague events since March.

We are offering colleagues the opportunity to become permanent homeworkers as we develop into a more flexible and digitally enabled organisation. Work will continue to develop our organisation in this way during 2021-22. We will also continue provide a comprehensive programme of support for colleagues' mental and physical well-being as the wider impacts of the pandemic continue to be felt.

Embedding our new operating model and realising the benefits

Our new model is designed to provide faster, more effective redress and a complete Ombudsman service that enables positive change in the sector. It is supported by our enhanced Scheme and strengthened powers. We began to transition to the new model in July 2020 and its benefits are already being felt.

- Our dispute support service is focused on working effectively with residents and landlords before a complaint enters our formal process to resolve the immediate issues.
- Our dispute resolution service is on track to meet the reduced average determination case time target of 4-5 months while positive customer feedback is above our increased target levels and quality has been maintained.
- Our new Quality, Engagement and Development directorate published our Complaint Handling Code in July. They have delivered 17 webinars to residents and landlords to explain the Code during the self-assessment period to 31 December 2020 with overwhelmingly positive feedback.

Our new Scheme went live in September 2020. This gives us the power to issue Complaint Handling Failure Orders where a landlord's complaint handling process is inaccessible, inconsistent with the Code or does not support the timely progression of complaints for residents. These are currently operating in shadow and will go live on 1 January. From that point onward, we will publish the orders issued each quarter on our website.

Our steps towards greater transparency to support effective complaint handling continue at pace. We intend to publish individual landlord complaint handling data and all of the Ombudsman's formal decisions before the end of this financial year.

Embedding our new model

Our main activities during 2021-22 will be steps to embed our new operating model and realise the further benefits this will bring. We will:

- Provide a much more responsive dispute support service as our new colleagues provide increased capacity. We will measure success through a new target to reduce the average time cases are open before Ombudsman action is taken.
- Reduce the average determination time within the dispute resolution service to 3-4 months, halving the target at the start of the corporate planning period, and increase the volume of cases resolved through mediation.
- Focus on maintaining the quality of our work in both dispute support and dispute resolution.
- Start systemic investigation work and produce more frequent thematic reports to support the sector to learn from complaints.
- Continue to increase awareness of, and accessibility to, our service.
- Publish a wider range of information about landlord performance to increase transparency, share learning and allow residents to hold their landlord to account.

Sharing learning

Our work here continues to be highly valued by residents and landlords with high levels of positive feedback. During 2020-21 we moved our sector development and engagement work online and delivered numerous webinars and events ourselves or in partnership with others.

In 2021-22, we will provide targeted support to landlords where they have particular issues, higher maladministration rates or complaint handling failure orders. We also want to develop a comprehensive range of complaint handling information, tools and training for residents and the sector as whole. For landlords, we intend to tailor this for complaint handlers, executives and non-executives.

Question 2: What learning would you like us to share and in what format?

Investing in our staff

We have had an overwhelming response to the external recruitment of roles to support our new operating model with almost 2,500 applicants across 11 different campaigns. Of the successful candidates, 65% were female and 25% identified as BAME.

During 2020-21, our focus will shift to creating programmes to demonstrate our commitment and willingness to invest in our staff. These will support learning and development in existing roles, specialism and opportunities to gain broader experience while promoting equality and diversity.

Investing in our systems

Covid-19 has increased levels of digital engagement between residents and landlords. While this may not be suitable for all residents, some will prefer this route to our service and will expect us to offer a digital service alongside our helpline. Our current systems do not support digital complaint handling or integrated customer relationship management. We will explore the costs and benefits of digitising and enhancing our systems during 2021-22. We will also take incremental steps towards this where possible, for example, creation of a secure site for landlords to upload the evidence we have requested.

What we will deliver

We intend to maintain the subscription rate at £2.16 in 2021-22 as previously advised with an average determination rate of 3-4 months, unless exceptional circumstances arise. Such exceptional circumstances could include changes in demand or changes in government policy. If the proposed rate was above £2.16, this would need to be approved by the Secretary of State. The activities we intend to deliver, and our stretching targets, are set out below.

Question 3: Do you have any comments on our business plan overall?

Strategic objective 1: Deliver a fair and impartial service, resolving complaints at the earliest opportunity

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
<p>1.1 Support greater local resolution of complaints (ie supporting the resolution of more complaints while they are within the landlord's complaints procedure)</p> <ul style="list-style-type: none"> • Landlords and residents are supported to resolve more complaints within landlords' procedures • Earlier mediated redress within our formal remit 	<ul style="list-style-type: none"> • Embed our new operating model and realise the benefits • Embed the new Scheme • Implement a structured approach to landlord support 	<ul style="list-style-type: none"> • Average time we take to deal with complaints going through the landlord's procedure is reduced [Target to be confirmed in business plan based on fuller set of data] • 85% of residents thought our advice or assistance was helpful in moving their complaint forward • 85% of landlords thought our complaint handling work improved their complaint handling or housing services • Set a baseline for reduction to complaint handling failure findings
<p>1.2 Enable faster access to redress once a complaint enters our formal remit for investigation</p> <ul style="list-style-type: none"> • Faster complaint investigations within our formal remit 	<ul style="list-style-type: none"> • Embed our new operating model and realise the benefits • Embed the new Scheme • Publish continued non-compliance with the Ombudsman's orders and consider referral to the Regulator 	<ul style="list-style-type: none"> • Average determination time for cases in our formal remit reduces to between 3-4 months* * Target is given as a range to accommodate the demand-led nature of our service • 99% of cases are determined within 12 months

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
		<ul style="list-style-type: none"> • 95% of orders are implemented within 3 months • 99% of orders are implemented within 6 months
<p>1.3 Improve the quality and consistency of our service</p> <ul style="list-style-type: none"> • Our work remains fair and impartial 	<ul style="list-style-type: none"> • Continue to regularly quality assure a sample of our work at all stages and act on findings 	<ul style="list-style-type: none"> • 95% of quality assurance reviews find casework was acceptable or better

Strategic objective 2: Promote positive change in the sector

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
<p>2.1 Continue to work directly with landlords and residents to improve complaint handling through a range of sector development and engagement activities</p> <ul style="list-style-type: none"> • Raise the profile of our work in the sector • Directly support improvements to the speed and effectiveness of landlord redress 	<ul style="list-style-type: none"> • Implement a structured approach to landlord support • Undertake systemic investigations of individual landlords in accordance with our published framework • Engage with our Resident Panel and host at least two full meetings 	<ul style="list-style-type: none"> • Set a baseline for reduction to complaint handling failure findings
<p>2.2 Use our knowledge to improve housing services</p> <ul style="list-style-type: none"> • Support improvements to housing services across the sector • Complaint handling standard developed, promoted and accepted as best practice across the sector 	<ul style="list-style-type: none"> • Start to build a comprehensive range of information, tools and training to support learning for residents and landlords • Publish four thematic reports across the year • Embed the Complaint Handling Code 	<ul style="list-style-type: none"> • 85% of landlords thought our sector development and engagement work improved their complaint handling or housing services • 85% of residents thought our sector development and engagement work was helpful • 20% increase in website page views
<p>2.3 Influence the sector and shape the landscape</p> <ul style="list-style-type: none"> • Influence debates to achieve the best redress outcomes for residents and landlords 	<ul style="list-style-type: none"> • Continue to publish individual landlord complaint handling data • Continue to publish data on the complaints we receive 	<ul style="list-style-type: none"> • XX% of positive feedback on individual landlord complaint handling data [Target to be confirmed in business plan based on data obtained following publication]

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
<p>2.4 Work effectively with the Regulator of Social Housing</p> <ul style="list-style-type: none"> • Appropriate data is shared to support effective regulation and dispute resolution 	<ul style="list-style-type: none"> • Strengthen our relationship with the Regulator of Social Housing through increased information sharing and referring cases of non-compliance or potential systemic failure in line with our latest MoU • Engage with others on the development of the Building Safety Regulator • Engage with MHCLG and the Regulator to support development of the Access to Information Scheme and develop measures of success 	

Strategic objective 3: Provide a service that is professional, accessible and simple to use

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
<p>3.1 Increase access to, and the availability of, our service</p> <ul style="list-style-type: none"> • Increased accessibility for residents and landlords • Increase awareness of our service amongst residents and landlords 	<ul style="list-style-type: none"> • Undertake activities to raise awareness of our service directly with residents and landlords in under-represented groups • Evaluate webchat and roll out if successful 	
<p>3.2 Improve signposting to our service</p> <ul style="list-style-type: none"> • Cross-referral arrangements with other Ombudsman / redress schemes support a ‘no wrong door’ approach for residents • Improved signposting to our service/the Housing Complaints Resolution Service by advice and support agencies, and designated persons for residents 	<ul style="list-style-type: none"> • Continue awareness raising work with advice and support agencies and designated persons • Continue to engage with other housing redress providers to improve access to redress 	
<p>3.3 Improve our customer journey, customer care and communications</p> <ul style="list-style-type: none"> • We deliver a high-quality service to residents and landlords, guided by their feedback 	<ul style="list-style-type: none"> • Gather insight into the customer journey through our Resident Panel, ‘Meet the Ombudsman’ events and direct landlord engagement 	<ul style="list-style-type: none"> • 85% of residents were satisfied with the service provided at local resolution • 80% of residents whose complaint was upheld were satisfied with the service provided

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
3.4 Invest in the learning and development of all colleagues <ul style="list-style-type: none"> • We recruit and retain sufficient colleagues to deliver our service effectively and efficiently • Our colleagues are appropriately skilled 	<ul style="list-style-type: none"> • Continue to act on customer feedback and complaints to improve our service • Continue to invest in our colleagues' learning and development, ensuring this promotes diversity and inclusion • Invest in our colleagues' health and well-being, particularly in response to Covid-19 and more flexible remote working • Understand the costs and benefits of digitising our systems; deploy solutions early where possible 	<ul style="list-style-type: none"> • 60% of residents whose complaint was not upheld were satisfied with the service provided

Strategic objective 4: Ensure our service is open and transparent

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
<p>4.1 Publish the Ombudsman’s decisions, individual landlord’s complaints data and our policies, procedures and guidance</p> <ul style="list-style-type: none"> • Publication of the Ombudsman’s decisions increases transparency about the outcomes our service can deliver • Data on landlord complaint handling helps residents to hold their landlord to account • Our approach to delivering our service is transparent and increases our accountability to stakeholders 	<ul style="list-style-type: none"> • Continue to publish the Ombudsman’s decisions • Continue to publish individual landlord complaint handling data • Continue to publish more data on the complaints we receive 	<ul style="list-style-type: none"> • XX% of positive feedback on individual landlord complaint handling data [Target to be confirmed business plan based on data obtained following publication]
<p>4.2 Appoint an independent reviewer of complaints against our service and publish their findings</p> <ul style="list-style-type: none"> • We are transparent about areas where we need to improve, and we learn from outcomes 	<ul style="list-style-type: none"> • Publish the reports of Independent Reviewer of Service Complaints and our progress in addressing their recommendations 	
<p>4.3 Benchmark our performance against relevant best practice</p>	<ul style="list-style-type: none"> • Continue to benchmark our service against Ombudsman Association 	

Strategic priorities and outcomes	Year three activities (2021-22)	Measures of success
<ul style="list-style-type: none"><li data-bbox="197 323 741 475">• We can demonstrate where our service meets best practice and actions we are taking where we need to improve	best practice and take action to address areas for improvement	