

Business Plan 2022-23

Using our values to deliver an independent, visible and proactive Ombudsman

Date: March 2022

Foreword

At the heart of this plan is our casework and investigations. An Ombudsman's investigation can have profound impact, both putting something right for the resident if it has gone wrong and encouraging organisational learning by the landlord to improve services and prevent future failure. Our plans over the next three years prioritise delivering high-quality, timely and inquisitorial Ombudsman decisions. To support that, this business plan sets out a significant expansion to our service to meet unprecedented levels of demand, which have continued to rise dramatically since our consultation, and as we shift our service to be more visible and proactive, following the revisions to our Scheme last year.

Our immediate challenge is to recruit, induct and develop many new colleagues to help us address the on-going surge in complaints and ensure our casework remains high-quality, impactful and timely. Having adequate resources is also integral to our independence as an Ombudsman and ability to fulfil our duties. Additionally, this plan aims to significantly increase awareness and understanding of our role, to improve access to the Ombudsman and reach people who may need the complaint system but face barriers in accessing it. It will develop our approach to investigation to reflect the increasingly complex nature of the problems we are seeing. The plan will evolve our approach to mediation, in an effort to strengthen resident and landlord relationships, and take a proactive approach to improving landlords' complaint handling to support earlier, local resolution. It will also encourage landlords to close the gap between individual decisions and organisational lessons, by evolving our systemic work, including our range of learning reports, and launching a new Centre for Learning. This plan also provides for continued efficiencies and improvement through digitisation and colleague development. And by developing our work on diversity and inclusion, we can also show that our staff are representative of the population they serve.

The issues we are seeing in complaint handling affect the breadth of our membership. Only by improving complaint handling at a local level will we see lower demand for our service; we hope our emphasis in this plan on supporting landlords to resolve more complaints themselves will help to achieve this over time.

We believe social housing is a unique sector deserving an independent, proactive and visible Ombudsman to support it. We believe this values-driven plan delivers that.

Richard Blakeway
Housing Ombudsman

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 housing sector**

Our members:



The Scheme is funded by subscriptions from members and is paid on a per housing unit basis.

Our vision, values and process




Our vision

Improving residents' lives and landlords' services through housing complaints

Our values

<p>▶ Fairness</p> <p>We are independent and impartial; we take time to listen carefully and to understand the evidence</p>	<p>▶ Learning</p> <p>We share knowledge and insights to maximise our impact and improve services</p>	<p>▶ Openness</p> <p>We are accessible and accountable; we publish information on our performance and decisions</p>	<p>▶ Excellence</p> <p>We work together to provide an efficient, high- quality service</p>
---	---	--	---

Our process

	Dispute support	We support the resolution of complaints while they are within the landlord's complaints process
	Dispute resolution	We make the final decision on complaints that remain unresolved through independent, impartial and fair investigation
	Sharing learning	We use our knowledge and insight to improve housing services by sharing learning across the sector

Our impact

In 2020-21:

Impact on individual residents

49%
of determined cases upheld
(up from 41% previous year)



Top three areas of complaint:

1. Repairs: 35%
2. Tenant behaviour: 15%
3. Complaint handling: 10%

Issued **10** complaint handling failure orders

3,455
orders and recommendations made



Including:

- 1,705 to pay compensation
- 272 to carry out repairs
- 381 to review policy/change process

£450k compensation ordered for residents



Impact on the sector

Presented **85** webinars and other training events over the year
to more than **2,500** delegates

Published **two** Spotlight reports



Published **four** Insight reports

20,405 views of our Complaint Handling Code web page
and **2,412** downloads of the self-assessment form

Held our **first** Meet the Ombudsman event - hosted by
Gentoo

750
landlord performance reports published



Started publishing **all** decision reports



Organisational change

Held **two** all colleague virtual
half day events



and **fortnightly** breakfast briefings
throughout the year

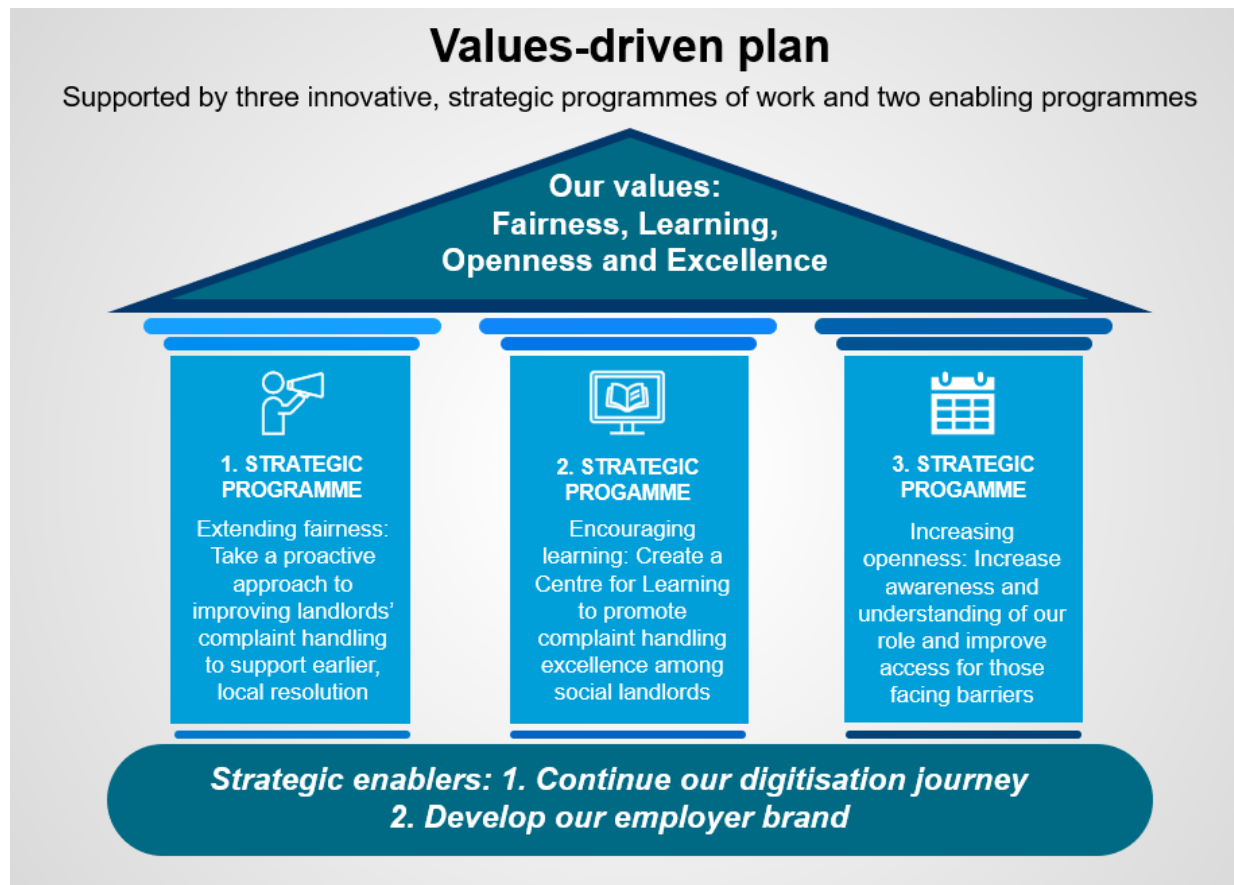
Increased our headcount by **52%** over the year

Our 'mean gender pay gap' is **-4%**, meaning that on average, women are paid 4% more than men per hour

Introduced new organisational structure with **three** directorates

Our plans for 2022-23

Within our values-driven plan are three innovative, strategic programmes of work that will see us offer more to improve residents' lives and landlords' services, and two enabling programmes that will allow us to be efficient, effective and to continuously improve. Year one of our business plan will see us taking work forward to deliver the outcomes we expect these programmes to achieve, alongside our core activities in dispute support and resolution.



Strategic objective 1: Extending fairness

Our work here aims to extend the reach of the fair outcomes our work delivers by elevating our interventions so they can benefit all residents and landlords, not just those who have brought a complaint to us. We will do this through our three operational pillars of: dispute support; dispute resolution; and systemic learning. This approach will help landlords manage increases in complaints by supporting local resolution and addressing factors which may be driving higher volumes.

We will also seek to deepen and broaden access to fairness for all residents. We will gather evidence to support the review of our powers set out in the Social Housing White Paper and look to expand our voluntary membership in a steady and sustainable way to provide redress where there may be gaps, particularly in the private rental market.

Our first strategic programme, which positions our dispute support function more strategically by building on the Complaint Handling Code to use intelligence from Complaint Handling Failure Orders and information from other sources to identify and support landlords to improve their complaint handling for the benefit of all residents, sits within this strategic objective. This programme will also include promoting earlier, local resolution of complaints through an enhanced enquiries service to provide more advice up-front, backed up with more tools to help residents make or progress their complaint to prevent issues from becoming entrenched. We will continue to support individual cases where we consider there is a need.

This strategic objective is broken down into the following key priorities:

- Strategic, intelligence-led approach to dispute support
- Strengthen the framework for Ombudsman's investigations
- Enhanced thematic insights and systemic work
- Support the review into extending our powers
- Grow our membership and closing gaps in redress

Strategic objective 2: Encouraging learning

Encouraging learning from complaints is an essential function for any Ombudsman. In a sector where residents have limited choice over their landlord, learning from events where something has gone wrong and providing effective complaints handling is essential to preserve both parties' ongoing relationship. It is also an effective way to prevent complaints escalating, as is increasingly the case at present.

A positive complaint handling culture in member landlords is an essential bedrock and that is why we want to develop our learning resources and embed our Code with landlords. Although compliance with our individual decisions is high and we have significantly increased the volume of learning tools provided over the current corporate plan period, there is much more we can do. This is area of our work that many landlords have asked us to expand.

Our second strategic programme, creating a Centre for Learning, aims to reshape our sector development and engagement offer to maximise its learning impact to ensure it reaches as many members as possible. This approach will add value to all landlords and residents, regardless of whether we have dealt with a complaint during the year. It will be tailored for different landlord types, sizes and locations. Everyone working for a landlord should feel able to contribute to a positive complaint handling culture so our work will engage people performing different roles, whether board members or front-line operatives. We will also extend our engagement with residents in our learning work, so they can see the difference complaints can make and consider whether their landlord is demonstrating learning from complaints.

This strategic objective is broken down into the following key priorities:

- Establish a Centre for Learning
- Drive a positive complaints culture

Strategic objective 3: Increasing openness

Our service has never been more open and transparent. During our current corporate plan we have published the Ombudsman's decisions, annual landlord performance reports and our policies and guidance. Being open promotes accountability, learning and, above all, awareness of the difference complaints can make.

The increased demand for our service suggests there is increased awareness, but a challenge that remains is ensuring that all residents share this awareness, understand the benefits alternative dispute resolution can bring and are willing to access us when they have an issue. It is also important residents are able to access the complaints process instead of considering more costly and adversarial alternatives, such as the courts. Awareness raising is the final of our key strategic programmes that will take place throughout the corporate plan and will be supported through collaboration with partners.

Another area that will promote openness is the proposal, outlined in the Social Housing White Paper, for an Access to Information Scheme. This will allow housing association tenants to request information on housing management from their landlord. We will act as the appeals service for this Scheme and development of this will take place during the three years covered by this corporate plan.

This strategic objective is broken down into the following key priorities:

- Raise awareness and build understanding
- Work collaboratively with partner organisations

Strategic objective 4: Achieving excellence

We want to provide an excellent service that meets our residents' and landlords' needs. The changes we have made to our service during our current corporate plan period to make it more effective and efficient have helped us to respond to rising demand. Whilst we will require additional resources to effectively manage the on-going substantial increases in demand for casework, we will drive continued efficiency and improvement. Our next steps in this journey over the corporate plan are set out in our two key strategic enabling projects, which will also reflect on our experiences during Covid-19.

The first strategic enabler will develop our employer brand so that we attract and retain the best staff, and that we then invest in their skills development so we provide a high quality service that continuously improves. Under this enabling programme, we will also develop our approach to corporate social responsibility and enhance our work on diversity and inclusion.

Our second is improve our efficiency through digitisation. This will include providing an online complaint handling channel with real time updates on complaints for landlords and residents who want to interact with our service in this way, but will not be at the expense of other routes into the service. This enabling programme will also look to increase the efficiency of our back-office systems and enable us to become a data-driven organisation.

This strategic objective is broken down into the following key priorities:

- Develop our employer brand
- Continue our digitisation journey

What we will deliver

Since our consultation was undertaken and up to the point of finalising this business plan for Secretary of State approval, demand on our service continued to surge to unprecedented levels - casework volumes across our process increased by 140% higher compared to the same period in 2020-21. The reasons for this are related to the Social Housing White Paper - increased resident awareness of their right to complain and faster resolution of complaints by landlords in line with our Code - and extend beyond a repairs backlog because of Covid-19. Future policy changes to improve access to complaints and the impact of building safety are likely to sustain higher volumes of casework. The increase also reinforces the changing role and importance of complaint handling itself, which should be an absolutely integral part of a healthy resident-landlord relationship and service development.

This has necessarily had an impact on the fee needed to support the transformation envisaged by the White Paper and accelerate redress for the complaints that come through to our service, as well as to deliver our other plans to help landlords manage demand in the future. Consequently, the fee for 2022-23 will be £4.60, above the £3.92 previously consulted on, but within our proposed cap for 2022-25 of £5.30 per home.

Within the fee rate, over 90% of the increase from 2021-22 is directed at addressing the growth in demand. This includes delivering timely, quality investigations which we have prioritised given the clear expectations of White Paper, and of residents and landlords in their response to our consultation. It also allows us to prepare for the potential removal of the designated person filter in 2022-23 and further expected increases in 2023-24.

We expect fee increases in subsequent years to be much less sharp as resource levels rebalance with demand and efficiencies from increased digitisation have more impact. We also plan to stay within the cap of £5.30 included in the consultation across all three years, and we will reduce the fee if expected demand levels do not materialise. Finally, we will review the impact of awareness raising on the distribution of complaints across our members in year three and consider whether our fee structure should be reviewed as a result, consulting on any new proposals with the sector.

Year one deliverables and our stretching key performance indicators are set out below. We report how we did against these in our Annual Report and Accounts each year.

Strategic Objective 1: Extending fairness

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
<p>1.1. Strategic, intelligence-led approach to dispute support</p> <ul style="list-style-type: none"> Targeted landlord support to improve complaint handling for all residents Residents and landlords are empowered to resolve complaints earlier and locally 	<ul style="list-style-type: none"> Explore how we can support others providing advice to residents Understand what tools residents need from us to help make and progress complaints with their landlord. Start to develop these Develop a strategy for intelligence-led landlord interventions to support more effective complaint handling Build data and intelligence analysis to support landlord interventions, including quarterly Complaint Handling Failure reports Review our current enquiries service and begin to build the advice offered at this stage 	<ul style="list-style-type: none"> 80% of residents are satisfied with the service provided at dispute support
<p>1.2. Strengthening the framework for the Ombudsman investigations</p> <ul style="list-style-type: none"> Where appropriate, findings from individual cases benefit all residents Restoring the landlord-resident relationship through appropriate redress 	<ul style="list-style-type: none"> Review our investigations, orders and recommendations, compliance and remedies policies and guidance Explore other routes to redress and begin to trial these Develop the liaison approach with landlords with higher volumes of investigations 	<ul style="list-style-type: none"> 80% of residents whose complaint was upheld were satisfied with the service provided 50% of the residents whose complaint was not upheld were satisfied with the service provided 98% compliance with orders within 3 months

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
<ul style="list-style-type: none"> • Remedies, orders and recommendations have impact on landlord services • Our inquisitorial approach is enhanced through specialisms • Quality Board with external members provides assurance over our approach 	<ul style="list-style-type: none"> • Design and start to build a more formal approach to casework specialisms based around landlords, issues, categories and case complexity • Set terms of reference for the Quality Board, recruit independent members 	<ul style="list-style-type: none"> • 100% compliance with orders within 6 months • 95% of quality assurance reviews find casework was acceptable or better • 85%-95% of cases are determined within six months • 100% of cases are determined within 12 months
<p>1.3. Enhanced thematic insights and systemic investigations</p> <ul style="list-style-type: none"> • Our Spotlight reports build a picture of the quality of residents' homes • We undertake systemic investigations where we identify serious or repeated complaint handling failure • We are responsive to other issues or themes as they arise 	<ul style="list-style-type: none"> • Continue to deliver our Spotlight reports and associated learning packages with at least two reports each financial year. Set out the planned topics at the start of the year • Develop our range of short, responsive publications as issues arise in-year • Develop our quarterly Insight reports • Build and maintain our relationships with regulators and other Ombudsman schemes 	
<p>1.4. Supporting the review into extending our powers</p>	<ul style="list-style-type: none"> • Set the evidence base to support the review into an expansion of our powers 	

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
<ul style="list-style-type: none"> We have a picture of where increased powers would benefit residents 		
<p>1.5. Growing our membership and closing gaps in redress</p> <ul style="list-style-type: none"> Strategic expansion of voluntary members Inform government policy to reduce housing redress complexity and close gaps for residents 	<ul style="list-style-type: none"> Develop a voluntary members strategy Engage with government to discuss the future of redress in the housing market Subject to legislation: <ol style="list-style-type: none"> Develop an MoU with the New Homes Ombudsman Develop an MoU with the Building Safety Regulator Develop a statutory MoU with Regulator of Social Housing 	

Strategic Objective 2: Encouraging learning

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
<p>2.1. Establish a Centre for Learning</p> <ul style="list-style-type: none"> Improving the sector's complaint handling through an integrated offer, differentiated by role and landlord type 	<ul style="list-style-type: none"> Establish landlord learning needs for the Centre for Learning based on insight from Dispute Support and Resolution Design and start to build the technical requirements for the Centre for Learning Begin to deliver content for the Centre for Learning, including for councillors, governing bodies and tenant panels 	<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
<p>2.2. Driving a positive complaints culture</p> <ul style="list-style-type: none"> Landlords and residents can understand each member's performance based on the complaints we have investigated Landlord governing bodies are better able to hold their organisation to account for its complaints handling Landlords are aware of current and future complaints handling challenges 	<ul style="list-style-type: none"> Undertake separate landlord and resident attitudinal surveys Produce annual landlord performance reports Produce the annual review of complaints handling in social housing 	

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
<ul style="list-style-type: none">• Landlords have insight into groups or complaint types that may face barriers in accessing or progressing complaints through their procedure		

Strategic Objective 3: Increasing openness

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
<p>3.1. Raise awareness of our service, build understanding</p> <ul style="list-style-type: none"> • More residents are aware of our service and understand the benefits of alternative dispute resolution • Improved access to the Ombudsman amongst groups that have not used our service in the past 	<ul style="list-style-type: none"> • Enhance awareness raising requirements in the Complaint Handling Code and incorporate these into the self-assessment checklist • Develop more communication tools for landlords, residents and ourselves to use to raise awareness of our service • Develop a strategy for Ombudsman-led awareness raising activity • Continue quarterly, regional 'Meet the Ombudsman' forums • Strengthen our stakeholder engagement and communication plans for key publications • Develop publications to explain the role of the Ombudsman and the benefits that this brings • Begin to review all of our communications to ensure these are clear, build trust in the service and our staff, and ensure residents can navigate our process 	

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
	Understand which resident demographic and geographic groups are not accessing our service	
3.2. Work collaboratively with partner organisations <ul style="list-style-type: none"> • Improved signposting to our service 	<ul style="list-style-type: none"> • Start to develop strategic relationships with key partners and resident advocates to raise awareness and improve signposting 	
3.3. Prepare for go-live of the Access to Information Scheme appeals service <ul style="list-style-type: none"> • Appeals under the Access to Information Scheme are delivered on time and in a fair way 	<ul style="list-style-type: none"> • Continue to work with DLUHC to plan the Access to Information Scheme appeals service 	

Strategic Objective 4: Achieving excellence

Strategic priorities and outcomes	Year one deliverables (2022-23)	Key performance indicators
<p>4.1. Develop our employer brand</p> <ul style="list-style-type: none"> We are accredited as a top 100 place to work and regarded as a socially responsible, diverse and inclusive employer We are an employer of choice Colleagues are positive about their learning and development opportunities and take advantage of these 	<ul style="list-style-type: none"> Create an academy to support all colleagues' learning and development Scope and deliver an academy content, including implementation of a people programme to promote and maintain high performing teams Explore caseworker accreditation Develop our diversity and inclusion programme Start to develop our corporate social responsibility approach Set out our employer value proposition 	
<p>4.2. Continue our digitisation journey</p> <ul style="list-style-type: none"> We have a fully digital complaint handling channel for landlords and residents Our back-office systems are more efficient and effective Our digital office supports effective hybrid working 	<ul style="list-style-type: none"> Review our work environment needs; ensure our office accommodation matches these and hybrid working is supported Deliver year one of our digital strategy, making best use of digital solutions including the development and delivery of an online portal to improve access, contact and engagement with the service 	