

**Responses to the
consultation on our
Corporate Plan 2022-25
and
Business Plan 2022-23**

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Introduction

As a public service that is funded by subscription from our members, it is important that we are accountable for the way we use our resources. This is underlined by our openness value which emphasises being accountable for the service we deliver. We are an arms-length body of the Department for Levelling Up, Housing and Communities so we are accountable to parliament, but we also have a responsibility to:

- the landlords who are members of our Scheme
- residents who have every right to expect prompt and proper consideration of complaints by their landlords and by us, and who ultimately fund our Scheme through their rent.

In October to November 2021, we consulted on our Corporate Plan 2022-25 which had been developed through extensive engagement with residents, landlords and organisations in the social housing sector in the preceding months.

In the consultation document we outlined our ambitious plans to grow and improve the service. It set out the context of an unprecedented increase in the volume of casework and major changes in the social housing sector.

The Plan aims to respond to the significant increase in complaints and outlines ways we will work with the sector to promote fairness through our investigations, strengthen complaint handling, encourage learning to improve services and potentially prevent complaints. It is built around our values of fairness, learning, openness and excellence.

We would like to thank all those who took the time to respond. We considered all the comments provided. This document is not intended to cover the detail of all the responses received but provides a summary of the comments made.

The consultation process

We published the [consultation document](#) on our website on 14 October 2021, and the consultation ran for four weeks to 12 November 2021. We set out the four strategic objectives with an introduction to each plus our priorities over the three years and the key activities for year one.

For this consultation we asked for views on our four values based strategic objectives, the activities planned for the first year, our proposed measures of success and approach to the subscription fee based on expected demand for our service.

During the consultation period we:

- Published the consultation as an online survey and enabled responses to be sent to us directly by email
- Publicised the consultation through our website, a special consultation

newsletter, social media, the housing press and targeted emails.

We received 130 responses in total, an increase from 75 responses in the previous year for the consultation on our business plan for 2020-21. The breakdown by type of respondent is below:

- 68 individual landlords
- 51 from individual residents
- 11 from other housing professionals and other organisations

The landlords that responded cover around 1.4 million households between them, which is 29% of the total units registered with us.

See Annex A for the list of those who responded.

Summary of responses

The overall responses and a breakdown by type of respondent is show in the tables below for each section of the consultation, plus a broad summary of the comments received.

Strategic objectives

We asked respondents if they agreed with each of the four strategic objectives and invited comments.

There was overwhelming support for all of the strategic objectives. The table below shows the percentage response rate overall and also split by type of respondent i.e. landlord, resident or housing professional/other. (*Note: not all respondents answered every question.*)

Do you agree with the strategic objective?	Overall		Landlords		Residents		Housing professional/ other	
	Yes	No	Yes	No	Yes	No	Yes	No
SO1: Extending fairness	123 (98%)	3 (2%)	65 (98%)	1 (2%)	50 (98%)	1 (2%)	8 (89%)	1 (11%)
SO2: Encouraging learning	121 (98%)	2 (2%)	64 (98%)	1 (2%)	49 (98%)	1 (2%)	8 (100%)	0
SO3: Increasing openness	121 (99%)	1 (1%)	63 (98%)	1 (2%)	51 (100%)	0	7 (100%)	0
SO4: Achieving excellence	122 (99%)	1 (1%)	63 (100%)	0	50 (98%)	1 (2%)	9 (100%)	0

There were positive comments welcoming the objectives and stating that overall they were comprehensive. Respondents gave strong support for some specific areas including use of mediation, targeted landlord support, the Centre for Learning, raising awareness and digitisation while being mindful of digital exclusion. Of the small

number who did not support the objectives there were comments on whether it was the right time to increase awareness as demand is increasing and also that we should not provide a digital service only.

Year one activities

Respondents were also asked if they agreed with the key activities for year one under each objective, again provided overall and by type of respondent. There was also overwhelming support for these.

Do you agree with the key activities in year one?	Overall		Landlords		Residents		Housing professional/ other	
	Yes	No	Yes	No	Yes	No	Yes	No
SO1: Extending fairness	123 (98%)	3 (2%)	65 (100%)	0	49 (96%)	2 (4%)	9 (100%)	0
SO2: Encouraging learning	121 (98%)	3 (2%)	62 (95%)	3 (5%)	51 (100%)	0	8 (100%)	0
SO3: Increasing openness	119 (96%)	5 (4%)	62 (95%)	3 (5%)	50 (98%)	1 (2%)	7 (88%)	1 (12%)
SO4: Achieving excellence	123 (98%)	2 (2%)	64 (98%)	1 (2%)	50 (98%)	1 (2%)	9 (100%)	0

Particular activities highlighted in the comments as welcome included more Spotlight reports, annual landlord performance reports, tools for landlords to raise awareness and the start of our digital strategy. There were also comments about involving landlords and residents in areas such as raising awareness and the development of the Centre for Learning. Of the small number who said they did not agree with the activities there were a couple of comments that we could use existing channels and forums to avoid the cost of creating a new Centre for Learning.

Strategic performance direction

We asked respondents if they supported our strategic performance direction as set out in the corporate plan. As the table below shows, there was almost unanimous support for this.

Do you support our strategic performance direction?	Overall		Landlords		Residents		Housing professional/ other	
	Yes	No	Yes	No	Yes	No	Yes	No
Strategic performance direction	123 (99%)	1 (1%)	63 (98%)	1 (2%)	51 (100%)	0	9 (100%)	0

Key performance measures

Respondents also strongly supported the key performance measures for year one as shown in the table below. Some respondents particularly welcomed the change in approach on case times for formal investigations. Of the small number who did not support them, it was generally in relation to case times not being ambitious enough.

Do you support the key performance measures for year one?	Overall		Landlords		Residents		Housing professional/ other	
	Yes	No	Yes	No	Yes	No	Yes	No
Year one key performance measures	115 (94%)	7 (6%)	62 (95%)	3 (5%)	47 (96%)	2 (4%)	6 (75%)	2 (25%)

Subscription fee/growth in demand

We asked respondents if they agreed that a 30% year on year growth in demand is a reasonable assumption. As the table below shows, the majority agreed.

Do you agree a 30% year-on-year growth in demand is a reasonable assumption?	Overall		Landlords		Residents		Housing professional/ other	
	Yes	No	Yes	No	Yes	No	Yes	No
30% year on year growth in demand	85 (70%)	37 (30%)	41 (65%)	22 (35%)	38 (76%)	12 (24%)	6 (67%)	3 (33%)

There were variations on what respondents thought the percentage growth should be with some saying it should be higher rather than lower, some the other way round and some saying they did not agree but couldn't say how much as they didn't have the data needed to make a judgement.

In the additional comments on this section, there were a number about the fee. Some concerned the fee structure and that having some element of the fee based on the number of complaints received about a landlord or on the size of the landlord would be preferable. A few raised concerns about an increase of 81% in the fee level, particularly with other pressures on their budgets. Others supported the fee increase and said it was needed to fund our plans, which they supported.

The consultation document recognised that the proposed fee is a significant increase on the current level but that it is almost wholly driven by the increase in demand. The plan also states that we will review the impact of awareness raising on the distribution of complaints across our membership and consider whether our fee structure should be reviewed, consulting on any new proposals in year three.

Between consulting and finalising the corporate plan demand for our service continued to increase, reaching 140% growth across the service compared to the prior year,

significantly above and beyond our annual planning assumptions. This means more resources are required in year one to help us support the transformation in local complaint handling envisaged by the Social Housing White Paper and accelerate redress for residents who come to us. The three-year maximum subscription fee cap remains at £5.30 per unit with a higher year one fee of £4.60. We will continue to seek the sector's view on the exact fee for each of the following years within our business plan consultations.

Annex A: List of respondents (including roundtable participants and earlier resident engagement)

Respondents on consultation document

From or on behalf of residents

- We received responses from 51 individual residents
- Taroe Trust
- Tpas

Trade bodies and other organisations

- G15
- Northern Housing Consortium
- Housemark
- Canta Mediation

Individual landlords

- A2Dominion
- Abri Group
- Advance Housing and Support Ltd
- Arawak Walton Housing Association
- Arun District Council
- Ashfield District Council
- Aspire Housing
- Aster Group
- Basildon Council
- Bristol City Council
- Bromford
- Cambridge City Council's
- Central Bedfordshire Council
- CHP
- Citizen
- Clarion Housing Group
- Coastline Housing Limited
- Curo
- Dacorum Borough Council
- Derby Homes
- Dorchester Municipal Charities
- East Suffolk
- Epping Forest District Council
- Exeter City Council
- Flagship
- Forhousing
- Gateshead Metropolitan Council
- Grand Union Housing Group
- Greatwell Homes
- Havebury Housing Partnership
- Herefordshire Council
- Heylo Housing Registered Provider

- Homes and Neighbourhoods - Kirklees Metropolitan Council
- Housing 21
- Housing Leeds - Leeds City Council
- Hull City Council
- Incommunities
- Inspire North
- Jigsaw Homes Group
- John Hammond Charity
- Karbon Homes
- L&Q
- Metropolitan Thames Valley
- mhs homes (two responses)
- Midland Heart
- Notting Hill Genesis
- Nottingham City Homes
- Ocean Housing
- One Manchester
- Optivo
- Orbit
- Paradigm Housing Group
- Peabody
- Platform Housing
- South Holland District Council
- South Lakes Housing
- Swindon Borough Council
- The Guinness Partnership
- The Pioneer Group
- Thirteen Group
- Together Housing
- Town & Country Housing
- Tuntum Housing Association
- Westward Housing
- WHG
- Wokingham Borough Council
- Wythenshawe Community Housing Group

Roundtable participants (July 2021)

From or on behalf of residents

- TPAS
- National Federation of Tenant Management Organisations (NFTMO)

Trade bodies and other organisations

- G15
- National Housing Federation
- Chartered Institute of Housing
- Northern Housing Consortium
- National Federation of ALMOs

- Regulator of Social Housing
- Housing Quality Network
- House Mark

Individual landlords

- Network Homes
- Tower Hamlets Homes
- Innisfree
- Poplar HARCA
- Curo
- Stonewater
- Peabody
- L&Q
- Richmond/ Wandsworth
- Southwark Council

Resident Panel engagement (21 July 2021)

358 Resident Panel members attended three sessions on the development of our corporate plan, providing early input.