

Report no:

Annual Complaints Review 2022-23

For information

Submitted to: [OBJ] Customer Committee

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Meeting date: [OBJ] 11 May 2023

Director: [OBJ] Ian Watts

1. Recommendation

1.1 The Customer Committee is requested to:

- **NOTE** PA Housing's complaint performance for 2022-23.
- **NOTE** the determinations PA Housing has received from the Housing Ombudsman (HOS), the lessons learnt from these and the actions that are being taken as a result to improve services and PA Housing's customer experience.

2. Issues to be considered by the Customer Committee

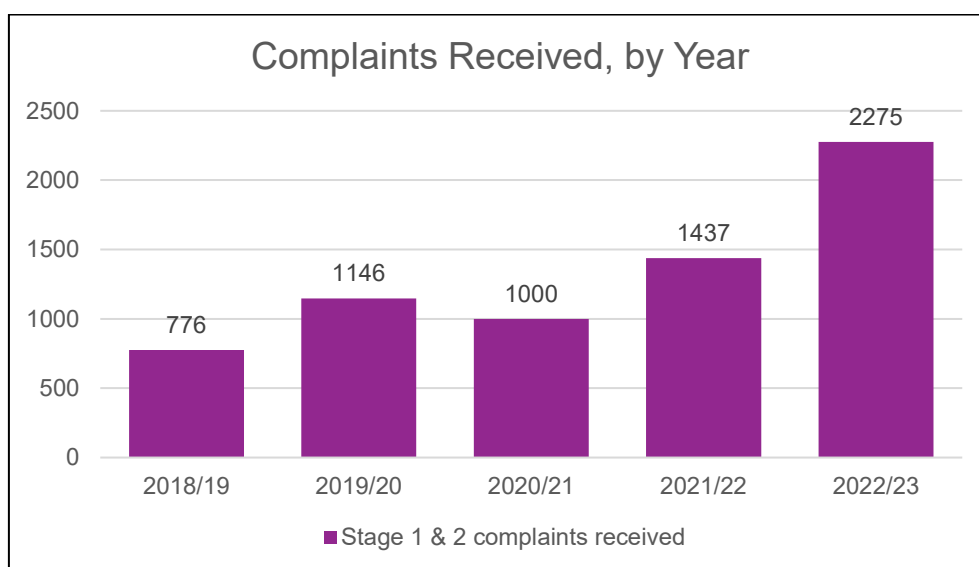
- 2.1 The volume of complaints received by PA Housing has increased by 58% in 2022/23, compared with the previous year. This is reflective of the social housing sector as a whole and the HOS has also reported a similar increase.
- 2.2 Despite this backdrop of increased complaints, PA Housing's response time performance has significantly improved, ending the financial year at 87% against a target of 90%. Performance has been consistently good throughout the year and was negatively impacted by a backlog of complaints in the last quarter.
- 2.3 58% of the complaints received this year were about Repairs, a 14% increase on last year. Gas servicing and breakdowns accounted for 22% of complaint received this year, a 6% increase on last year. Whilst the increased volumes of these areas stand out, most of the categories have seen volumes double or increase significantly in comparison to last year.
- 2.4 During 2022/23, 35 determinations were received from the Housing Ombudsman Service, 5 more from the previous year (30). 29 were from London or the Southeast; just 6 were from residents living in the Midlands. Three severe maladministration orders were received.
- 2.5 The three severe maladministration cases relate to cases which arose in 2021 and reflects the problems which we have already identified with our repairs service and overall customer experience. These cases relate to complex repairs, delays in getting the works completed and lack of proactive communication with the resident.

- 2.6 The Committee are aware of the work that has been undertaken and is ongoing to improve and stabilise the repairs service. Over the last 12 months there has been improvement in the overall customer experience. But there is a long way to go to meet resident expectation and deliver a consistently good and easy service overall. The reorganisation and new structure will provide a fresh approach and opportunity to deliver significant improvement.
- 2.7 Improving these core services will reduce the volume of complaints received by PA Housing. This will enable the Complaints Team to be more proactive in improving the service and delivering lessons learnt to the wider business. This should result in the risk of severe maladministration or HOS findings in general reducing.

Complaint performance for 2022-23

Volume of complaints received

- 2.8 There was an unprecedented number of complaints received in 2022/23. A total of 2,275 were received in the 12 months period – a 58% increase on the previous financial year, and double the amount received in 2019/20. This is an average of 190 complaints a month. Compared to 120 in 2021/22, 83 during 2020/21 and 96 in 2019/20. The number of complaints received during 2020/21 was lower than average due to the Covid 19 pandemic.



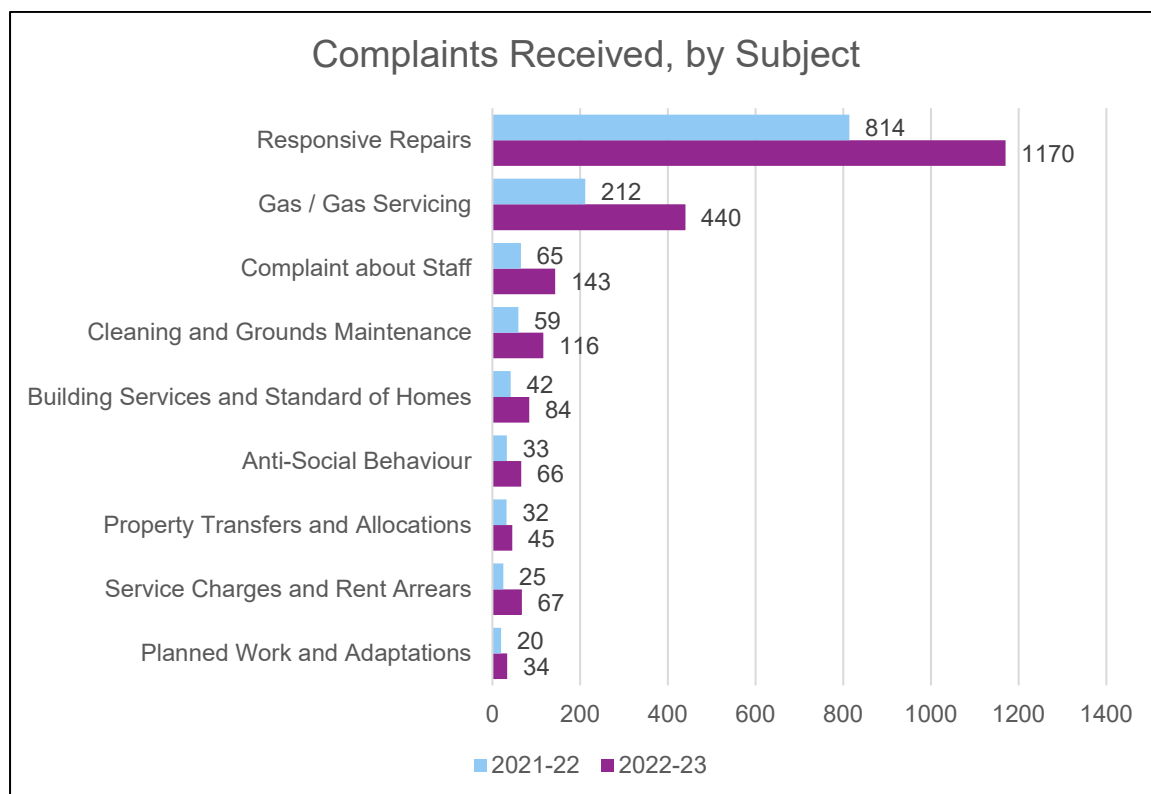
- 2.9 There are several reasons for the increase in complaints volumes including greater awareness of the Complaints process, social media campaigns and government advertising. There was a significant peak in complaints in November 2022 due to the increased publicity around damp and mould. The Complaints team did not have the resource to meet the turnaround targets and the Repairs team have also struggled with capacity to respond in time to both residents and colleagues. The winter also saw a significant increase in heating and hot water breakdowns, rising from an average of 57 cases per quarter for Q1 and Q2, to 150 cases in Q3 and Q4.

2.10 66% of the complaints received were upheld, a further 11% were partially upheld, and 23% were not upheld. Complaints are often upheld due to a lack of action or communication by PA Housing resulting in residents having to chase up the status of their query. Additional work is planned business-wide to review repeat contacts and help reduce these to avoid service requests escalating, thereby helping to reduce the overall numbers of complaints.

2.11 A total of £140,812 was spent on compensation this year, averaging £62 per complaint. This total figure is significantly higher than the £45,315 spent last year, which equated to an average of £32 per complaint. The HOS approach to compensation has contributed to the increase in expenditure this year. HOS determinations will often include enhanced compensation payments. The PA Housing Compensation Policy has been reviewed with residents and colleagues to meet the HOS and resident expectations and will be live from May 2023.

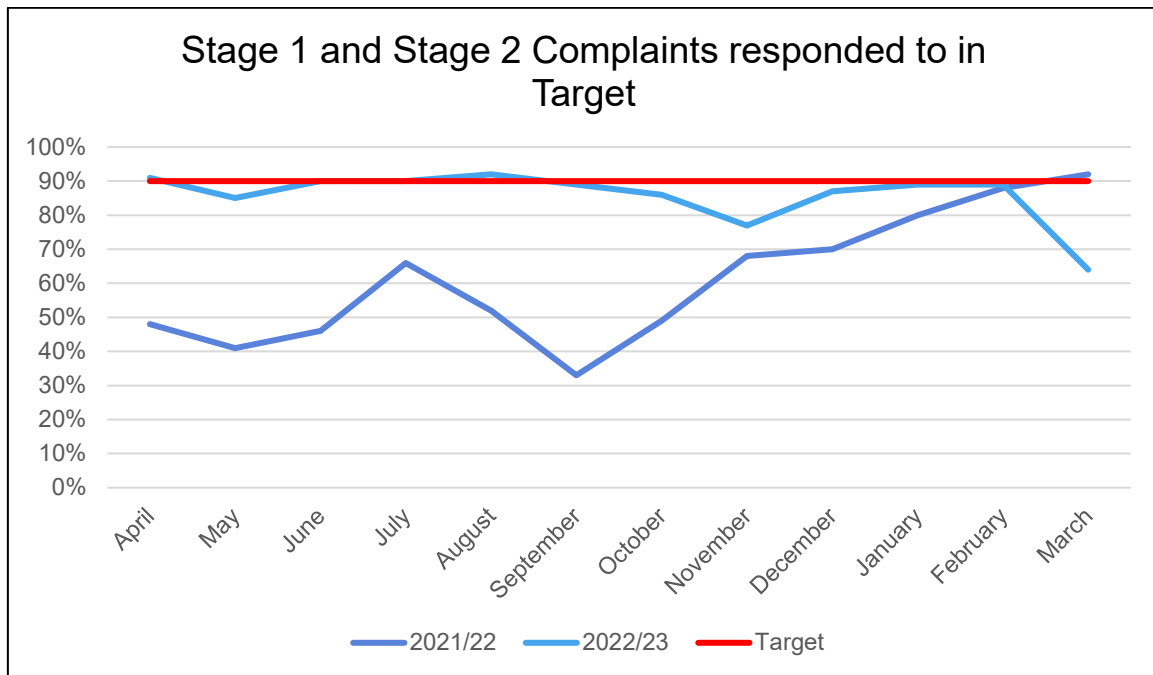
Complaints by service areas

2.12 Issues around responsive repairs made up most complaints during 2022/23, with 58% of the total received. Gas servicing & breakdown issues make up a further 22% - up 6% from the previous year. Whilst the increased volumes of these areas stand out, nearly all the categories have seen volumes double or increase significantly in comparison to last year. This reflects the overall trend in complaints volumes across PA Housing and the sector in general with the Housing Ombudsman Service reporting a 29% rise between Q3 2021/22 and Q3 2022/23 in their latest report.



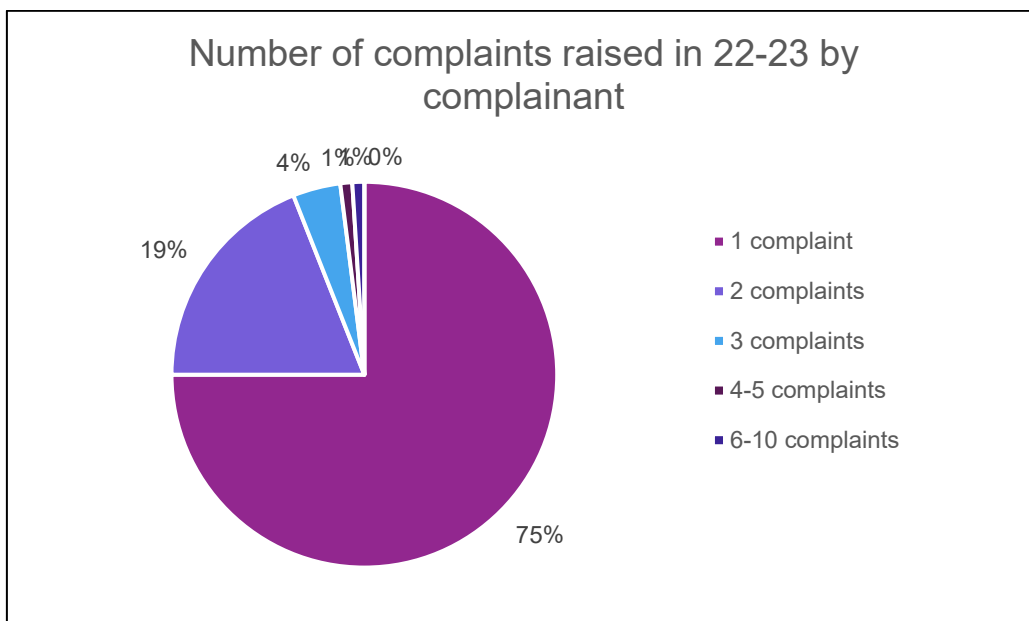
Response times to complaints

- 2.13 Response times have remained within target for the majority of 2022/23. The complaints team have worked closely with the teams experiencing high volumes of complaints. The impact of the significantly higher volumes since November 2022 has resulted in a backlog of complaints, with recovery plans in place to improve performance. On average, 89% of complaints were responded to in target for the first 6 months of the year, and 82% for the last 6 months.



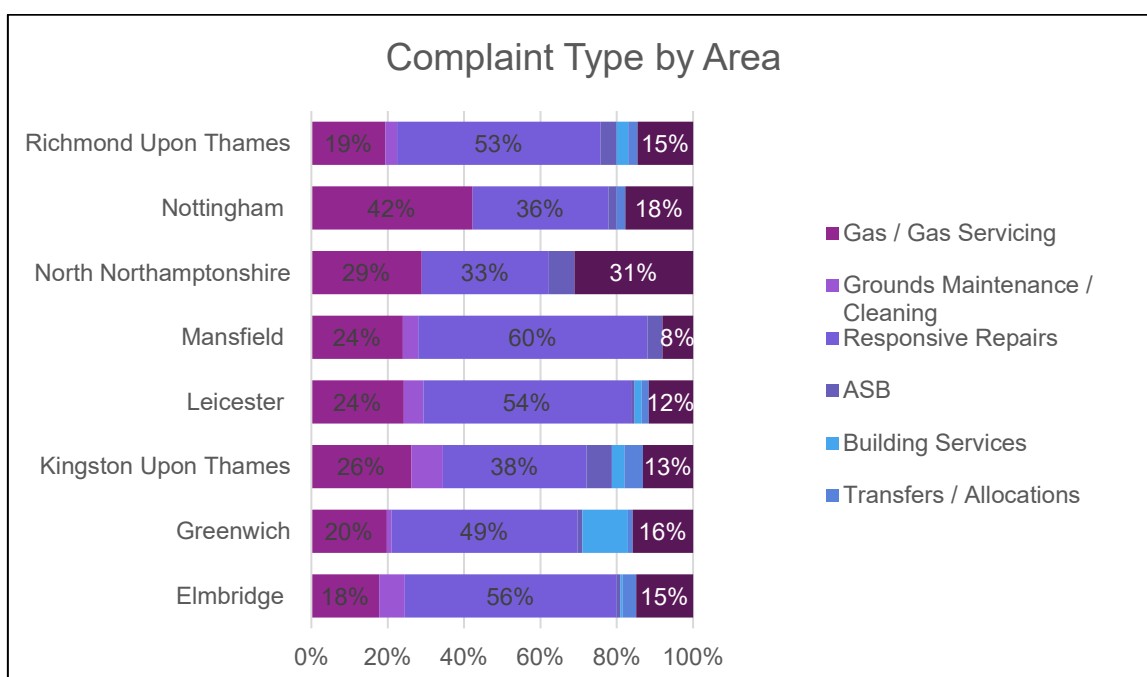
Repeat Complaints

- 2.14 Of the residents who complained this year, 75% had only complained once. 19% had complained twice and 6% had raised three or more complaints in the last year. Further work will be done to review the reasons for repeat complaints to understand what can be done to restore our relationship with these residents.



Complaints by area

2.15 The graph below shows the breakdown of complaints for the PA Housing areas with the highest number of cases over the last 12 months. Whilst these mirror the overall split of complaint subject, the number of Gas related complaints in Nottingham stands out compared to the other regions. The lower proportion of Repairs complaints for Nottingham and North Northamptonshire contrast with the London and Southeast regions. Although the percentage is the highest for Mansfield, there are fewer properties in that area.

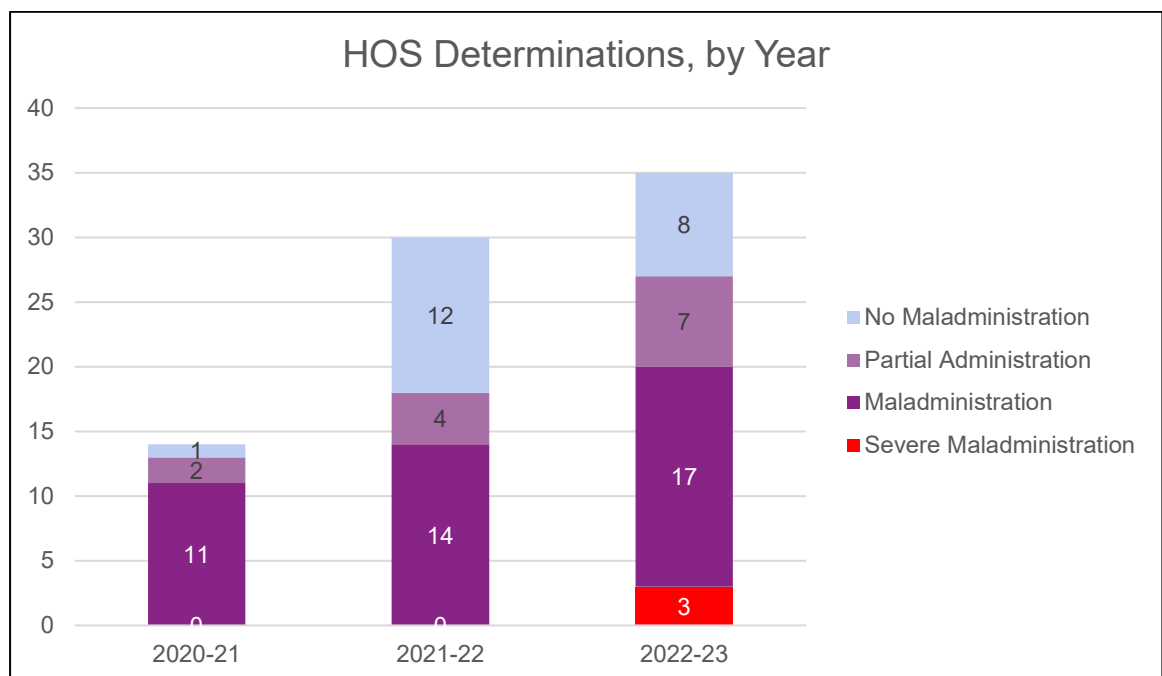


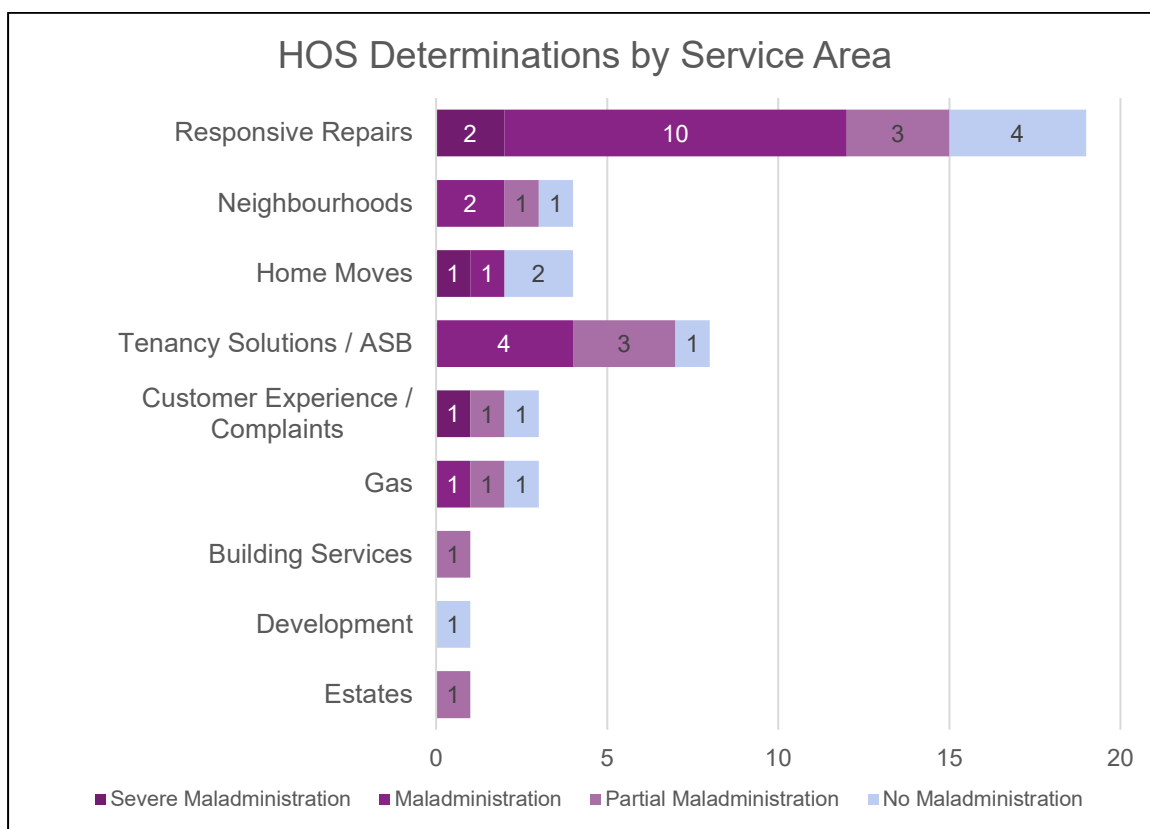
Housing Ombudsman Determinations

2.16 During 2022/23, 35 determinations were received from the HOS, 5 more from the previous year (30). 29 were from London or the Southeast; just 6 were from residents

living in the Midlands. Of the 35 cases determined this year 22 complaints were originally raised in 2021/22, 10 from 2020/21 and 3 cases from 2022/23.

- 2.17 The 3 Severe Maladministration cases have been detailed previously and accounted for 9% of the total. This is an increase from 0 last year. The HOS issued 31 Severe Maladministration determinations to RP's compared to 11 in 2021/22. This is an increase of 182% and demonstrates the increased scrutiny and expectations of the HOS.
- 2.18 The percentage of Maladministration findings increased slightly from 47% to 49% this year, with Partial Maladministration findings increasing too from 13% to 20%. No Maladministration findings reduced from 40% to 23%.
- 2.19 Most determinations were either partially or completely regarding Responsive Repairs (19) and Tenancy Solutions (8). Although Gas / Gas Servicing is the second highest area for complaints received, only 3 of the Housing Ombudsman determinations related to Gas / Gas Servicing.





2.20 The table below shows the complaint themes, findings from the HOS and Lessons to be learnt / Actions to be taken for the primary areas where we have received determinations.

Number of determinations by complaint theme	Findings by the HOS	Lessons learnt / Actions to be taken
8 x Tenancy Solutions	<ul style="list-style-type: none"> - Lack of follow up to reports of ASB (Anti-Social Behaviour) / Noise Nuisance - Failure to evidence action on follow up actions which were communicated to residents - Lack of risk assessments when dealing with long standing complaints, which would help set resident expectations - Failure to inform resident of a referral to High Harms Panel 	<ul style="list-style-type: none"> • Case closure controls including manager approval and complainant communications to ensure all support and actions have been exhausted. • Recording of all notes/visits on ReACT/CRM to ensure effective case management and accurate case files. • More robust communication with customers and managing expectations, providing clarity on what can and cannot be done. • Review customer comms prior to referral to multi agency panels, assessing risk and impact to all customers involved before disclosure. • Staff training on risk assessments and the impact

		they can have early on in complex cases.
19 x Responsive Repairs	<ul style="list-style-type: none"> - Long unexplained delays in completing repairs or arranging appointments - Lack of follow up on things we said we were going to do - Residents (particularly leaseholders) lacked clarity on expectations of repair responsibilities, which could have avoided complaints escalating - Failures to effectively manage and communicate updates on complex repairs 	<ul style="list-style-type: none"> • Following the severe maladministration findings action plans were created to address the management of complex cases and communication issues highlighted. These plans have been impacted by the turnover of staff particularly within the surveying team. • Repairs complaint officer roles have been introduced to investigate, track, and follow up on stage 1 complaints, ensuring cases don't escalate where possible. • Greater use of CRM (Customer Relationship Management) to track progress of actions to ensure records are kept as evidence if requested.
3 x Customer Experience	<ul style="list-style-type: none"> - Compensation offers are inconsistent, and do not always factor in the duration of the complaint and the impact they have on tenants - Historic complaints responses were not always complete 	<ul style="list-style-type: none"> • Compensation Policy to be finalised to ensure appropriateness taking in to account all aspects and impact on the resident. • Complaints team training completed to ensure thoroughness of responses and communication is human centred.
4 x Neighbourhoods	<ul style="list-style-type: none"> - Lack of evidence provided for policies around the storage and removal of personal items in communal areas. - Lack of clarity and conflicting actions taken about CCTV usage 	<ul style="list-style-type: none"> • Reviewed our procedure for managing shared areas to satisfy that this clearly sets out each step that staff should take when dealing with items left in communal areas • CCTV policy and guidance reviewed and updated on our website to provide clarity to residents and staff

A Summary of Common Complaint Themes during 2022-23

2.21 Complaint themes continue to primarily relate to a lack of ownership from PA Housing when issues become more complex causing repeat contact and effort. Residents feel that promises are not kept when communicating and resolving complaints and that it takes too long for their issues to be resolved. These findings are re-enforced by the HOS determinations above and have remained consistent throughout the year.

- 2.22 Within the last 12 months resident expectations not being met, and residents given unreasonable timescales accounted for 62% of the overall feedback. Poor communication accounted for 24% of overall feedback.
- 2.23 Solutions to address these findings from complaints include:
- 2.24 Notifying residents of what is happening and ensuring that those commitments are met. Utilising CRM to track progress of this and reporting to identify where this has not happened.
- 2.25 When things go wrong, give the resident as much notice as possible. This is particularly in relation to Gas and Repairs related complaints where either appointments are changed or cancelled. The lack of communication is a common theme from PA Housing and our contractors.
- 2.26 Improve communication internally and with external partners to get the complaint resolved as quickly as possible. This has been particularly evident over the last 6 months as volumes have increased.
- 2.27 Carry out a review to highlight current administrative gaps in the monitoring and oversight of the gas repairs through to job completion. Proactive management of gas repairs to ensure open jobs are followed through to completion and more contact with residents. Keeping residents updated with timescales to complete outstanding works, assist with arranging access, resident welfare checks and ensure adequate temporary heating is provided

Overview from the Customer Experience Complaints Team

- 2.28 The Complaints team has seen several changes during a challenging year. Initially, the focus was to maintain the improved performance in responsiveness, this saw significant improvement, the quality of complaint responses was prioritised following HOS determinations. The team also worked hard to adhere to the HOS updated Complaint Handling Code and complete the Self-Assessment.
- 2.29 The increased volume of complaints month on month has impacted the ability to manage cases effectively, with further work required on how we deliver lessons learnt. Following the Scrutiny report in the Autumn, the team received permanent contracts which helped morale, and the new Repairs Complaints Officer roles have been welcome additions. The team has also benefited from 1 seconded Complaints Specialist to help with the volumes.
- 2.30 Resourcing to deliver the changes in our complaints approach and improvements we have identified in this report will be key going in to 2023/24. As well as ensuring the team have support from the rest of PA Housing to prevent complaints happening and responding to complaint investigations in a timely manner.

Resident Complaint Panel

- 2.31 The Resident Complaints Panel was established in March 2021, with the aim of engaging residents on our complaints approach. Providing us with feedback, recommendations and guidance on our complaint handling performance and customer

experience. The Panel have met 4 times this year and have provided feedback on the revised complaints policy and the HOS self-assessment.

- 2.32 The meetings have also provided an opportunity to share case studies and give residents an insight into the management of a complaint. This helps the Panel's understanding as well as enabling them to identify any opportunities for improvements. One such example of an opportunity for improvement is for acknowledgement letters to include a summary of our understanding of the customer's complaint. This has been implemented and received positive feedback from residents who have made complaints.

3. Customer, Staff and other Stakeholder Outcomes

- 3.1 Performance has improved in terms of our response times for complaints which is positive for our complaints service experience. It is very disappointing that PA Housing has received three severe maladministration orders. These are for historic cases and known issues, where actions were already in place to address the complaint. We need to ensure we continue to learn from these cases and prevent similar issues happening to other PA Housing residents.
- 3.2 We continue to monitor the level of complaints and the resources to provide the complaint handling service. Over the next 6 months we will focus on dealing with repeat contacts from customers and service request issues which, in time, should lead to less dissatisfaction and complaints from customers in the first place.

4. Further Considerations

- 4.1 **Risk and Impact:** There is a reputational risk for PA Housing due to rising complaints and service failures which also affects customer satisfaction. Further severe maladministration determinations could lead to the HOS conducting further investigations using their systemic powers to identify areas for a landlord to learn and improve. Reviewing complaint performance, learning from best practice, complaint lessons learnt and translating these into actions is therefore key in reducing this risk.
- 4.2 **Legal, Regulatory and Compliance:** The Social Housing Charter and the revised Complaint Handling Code formalises the positive complaint culture expected from Housing Associations. Part of the requirements is to regularly update the Board on complaint performance and share lessons learnt, as detailed in this report.
- 4.3 **Strategic and/or Operational implications:** Complaint performance and Lessons learnt detailed in this report supports the wider organisational customer experience plan for PA Housing and our service improvement priorities.
- 4.4 **Equality, Diversity & Inclusion:** Part of the lessons learnt identified in this report is regarding the identification of a resident's personal circumstances. Continuing to address this through quality assurance work, reasonable adjustments, coaching and training to customer facing colleagues is key. The complaint service is also part of the annual customer characteristic report provided to the Customer Committee where access to this service is reviewed and recommendations provided.

- 4.5 **Financial / Value for Money implications:** Improvement in complaint handling and the customer experience reduces compensation costs, creates better landlord / customer relations, and will have a positive impact on overall customer satisfaction.
- 4.6 **Compliance with General Data Protection Regulations (GDPR):** No personal data has been used in the preparation of this report.
- 4.7 **Director Approval and Colleagues who have been consulted on the content of the report:**
- Ian Watts
 - Customer Insight Analyst
 - Housing Services Heads of Service and Assistant Director