Meeting of:	Town and Country Housing Board
Meeting Date:	17 July 2025
Agenda Item No:	TBC
Title of Paper:	Annual Complaints Performance and Service Improvement Report 2024/25
Author:	Andrew Greenwell, Customer Feedback and Information Manager
Presenter:	By email
Action Required:	☐ Approve
	✓ Recommend to Board for approval and comment
	☐ Note

PURPOSE

The Board is requested to:

- **NOTE** Complaints Performance for 2024/25.
- APPROVE the Annual Self-Assessment against the Housing Ombudsman's Complaint Handling Code (Appendix 1).
- AGREE that a response from the Board, confirming approval of the self-assessment and including a comment on this Complaints Performance and Service Improvement Report, be prepared for approval by the Member Responsible for Complaints, for publication by end of September to meet the Ombudsman's revised submission deadline (our intention is to submit asap after Board approval as we understand that Peabody are currently still working to the end of June deadline).

SUMMARY

This paper reports on:

- Complaints Performance for 2024/25.
- Housing Ombudsman Determination 2024/25.

GROUP'S STRATEGIC GOALS – Tick the strategic goal(s) the paper supports:

✓ We are all about people	☐ We are passionate about creating a sustainable TCH
✓ We are focused on getting the basics right	

RISK AND FINANCIAL ASSESSMENT

Laws, Regulations & Operating Environment

Non-compliance with laws and/or regulations may result in significant sanctions, losses, fines, or reputational loss.

Customer Services

The monitoring of complaints and lessons learnt as a result will strengthen our ability to manage this risk and improve our resident complaint service provision.

RESIDENT, COLLEAGUE AND CULTURE

Residents are at the heart of the Board's decision-making and are provided with appropriate arrangements for the handling of complaints. We review all complaint responses before they are sent to the complainant and use this process to drive continuous improvement and promote a culture of effective and compliant complaints management throughout TCH.

VALUE FOR MONEY (VFM) AND ESG (ENVIRONMENTAL, SOCIAL AND GOVERNANCE)

Ensuring that TCH operates effectively, efficiently, and economically, in accordance with regulatory requirements.

REVIEW PROCESS

EMT have reviewed and agreed this approach.

APPENDICES –

Appendix 1 – Self-Assessment Form 2025

Appendix 2 - Landlord Report Town and Country Housing 2023-24

Executive sponsor: Operations Director, Stuart Ilsley

1. COMPLAINTS PERFORMANCE 2024/25

1.1 COMPLAINT VOLUMES: The table below displays the volume of complaints received and closed during the year 2024/25.

Complaint Volumes 2024/25													
RECEIVED	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sept**	**Oct**	**Nov**	**Dec**	**Jan**	**Feb**	**Mar**	**TOTAL**
Stage one complaints received	62	83	39	67	41	60	90	88	52	104	86	88	**860**
Stage two complaints received	25	17	14	30	18	15	18	22	15	24	30	21	**249**
Total	**87**	**100**	**53**	**97**	**59**	**75**	**108**	**110**	**67**	**128**	**116**	**109**	**1109**
CLOSED	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sept**	**Oct**	**Nov**	**Dec**	**Jan**	**Feb**	**Mar**	**TOTAL**
Stage one complaints closed	56	51	98	71	58	46	69	75	84	59	60	123	**850**
Stage two complaints closed	20	21	9	24	21	23	9	13	13	25	18	22	**218**
Total	**76**	**72**	**107**	**95**	**79**	**69**	**78**	**88**	**97**	**84**	**78**	**145**	**1068**
Number of properties							**13,597**						
% of complaints received per property							**8.1%**						

We experienced a 28% increase in the number new of complaints received in 2024/25 compared to the 2023/24. We reported a 10% increase last year compared to 2022/23. As we continue to promote it and awareness of the complaints process continues to grow, we have always expected the number of complaints received to increase year on year. As such we do not feel that this is a significant increase or representative of a poor service. However, we have found that the complaints and associated services have continued to become more complex in nature with damp and mould related cases continuing to be a significant driver of this.

The number of cases being escalated to stage 2 for the financial period of 2024/25 was 29% whereas last year 25% of cases received escalated to stage 2. Although this has increased, the difference reflects the increase in the number of complaints being received. Outstanding Repairs and Damp and Mould are the main complaint categories associated with the escalations. This is also linked to the ongoing high demand on our repairs service and the significant backlog of complaints that we started the 2024/2025 period with.

TCH has increased the complaint handling resources of the Repairs team by seconding an additional complaint handler to them. Additional stage 2 handlers have been recruited from across the organisation's managers. There has also been an agreement for an additional Complaint Coordinator resource for Contracts and Compliance, and the Complaints and Feedback teams. The Complaints and Feedback team successfully recruited an additional complaints coordinator, the Contracts and Compliance resource will be reviewed as part of the wider review of how the TCHR service is delivered.

TCH has declined to accept 43 complaints in 2024/2025 the majority of these were because the matter raised was an initial request for service with the second most common reason being because the matter was about the increase in service charges, which sits outside the complaints process.

1.2 TOP FIVE SERVICE AREAS: The table below lists the top five service areas which drive 95% of new complaints.

Service Area	Reasons for Complaints	% of cases
Contracts and Compliance	***Heating and hot water*** related issues have been the main driver of complaints received, mainly concerning a lack of communication and resolution of the reported issue. One of the root causes has been the restructure of Swale Heating following its merger with Sureserve which coincided with the winter period. ***Outstanding Repairs*** was the second most prevalent concern, mainly relating to complex and ongoing works. Communication was also a secondary point in these complaints. One of the root causes of this was the lack of surveyors early in the financial year.	47%
TCH Repairs	***Outstanding uncompleted repairs*** continues to be the largest source of complaint in this area, with lack of communication being a recurring theme within. ***Communication and Damp and mould*** **issues** were the second most common theme, with lack of updates and recurring and unresolved damp and mould issues being the main issue.	27%
Housing Management	***Lack of communication*** was the most frequent issue reported, highlighting issues surrounding residents not being informed of the progress of agreed actions or having calls returned when agreed. **ASB handling** was another major theme. Issues mainly arose when the ASB was not resolved and there was a perception that actions had not been taken.	12%
Asset Investment	The most frequent issue raised was related to ***kitchen and bathroom replacements***, mainly surrounding quality of the works completed**.**	6%
Income Management	Complaints received were mostly about ***communication and staff,*** but were often found to be the same types of complaints where residents were unhappy with the message they were being given.	3%

Across many of the service areas highlighted, the primary theme being identified is communication, ensuring that all parties are regularly updated, and managing expectations. TCH needs to consider how to better identify and record the root causes of service failures identified in complaints and how to address these in the broader context.

1.3 COMPLAINTS PERFORMANCE MEASURES: The table below displays our performance against complaint measures for the year of 2024/25 with individual quarters and the overall total.

Complaint Measures 2024/25					
	Q1	**Q2**	**Q3**	**Q4**	**2024/25 Total**
1) % of complaints escalated to Stage 2	30%	37%	24%	27%	**29%**
2) % of complaints upheld at stage 1	55%	62%	60%	60%	**67%**

3) % of complaints upheld at stage 2	59%	65%	38%	52%	**55%**
4) % of stage one complaints responded to within 10 days	23.4%	56%	78%	71%	**58%**
5) % of stage two complaints responded to within 20 days	34%	50%	54%	57%	**49%**
6) Customer Satisfaction % with complaint handling	32%	30%	44%	55%	**40%**

Please find below a summary of our complaints performance:

1) **Stage two escalations**: 29% of our stage one complaints were escalated to stage 2 in the last financial year. This is 9% more what were escalated in the previous financial year. This is not unreasonable given the overall increase of complaints received and the challenges we had with complaint handling in the first two quarters of 2024/25. Our complaints policy was also updated in line with the latest version of the Ombudsman Complaint Handling Code which ensures there are no barriers to residents when wanting to escalate a case.
2) **Complaints upheld**: 67% of stage 1 complaints have been upheld across the year. This has been significantly impacted by the large volume of complaints we started the year with and was mostly linked with the increased demand on the repairs service and complex nature of the works required. 55% of stage 2 complaints have been upheld for the same reasons.
3) **Stage 1 Response rates**: Our complaints response rate was significantly impacted at the start of the financial year by the existing volume of cases. There was significant improvement following a programme to address the outstanding complaints and additional resources, tools and support were implemented to monitor and support the active complaints. These all came into effect part way through Q2 and started to be reflected in Q3 and Q4's performance.
4) **Stage 2 Response rates:** Stage 2 response rates were low at the start of the year due to the high volume and complexity. This has started to improve across the year as additional complaint handlers and support resources have been introduced. However, due to the complex nature of many of the cases this did not improve to the same level as stage 1, this was because many residents did not want a response until the associated works were completed.
5) **Customer Satisfaction**: Satisfaction with complaint handling is lower this year and residents have told us that they have found it difficult to get their complaints resolved and that we have not always delivered on what we said we would. This is again linked to the high volume of repairs complaints at the start of the year causing longer response times. We have also seen a number of responses where the residents have said that they were happy with the complaint handling but their dissatisfaction was around the reason for the complaint in the first place. This has prompted a review of the survey questions being asked.

2. HOUSING OMBUDSMAN DETERMINATIONS RECEIVED 2024/25

DETERMINATIONS RECEIVED: The table below presents a breakdown of the 26 determinations received from the Housing Ombudsman (HOS) from April 2024 to March 2025 (*Please note that due to system changes and human error, 4 case outcomes were not recorded on the CRM system until after 1 April 2025 and will show in next year's reporting. However, they have been included here as they will appear in the next Ombudsman Landlord Report.*).

2.1 Individual cases can have multiple determinations, but TCH has recorded the outcome here against the most relevant outcome. Of these, 10 were found to have maladministration. TCH also received its first ever determination of severe maladministration.

Landlord	Out of Jurisdiction	No Maladministration	Service Failure	Maladministration	Severe Maladministration	Reasonable Redress	Total
TCH	**3**	**1**	**5**	**13**	**1**	**4**	**27**
%	**11.5%**	**3.85%**	**15.4%**	**50%**	**3.85%**	**15.4%**	**100%**
2023/24	*1*	*0*	*3*	*4*	*0*	*1*	*9*

The 27 determinations have a total of 55 individual case findings. This is because one determination can have multiple findings. Out of the total individual case findings, 20 were maladministration, 1 was severe maladministration, 15 were findings of service failure, and 8 were no maladministration, 6 were reasonable redress and 5 were outside of jurisdiction. The Resident Experience Committee receives a detailed breakdown of determinations and individual case findings at each meeting to monitor progress with resolution.

2.3 **Housing Ombudsman Paragraph 54f orders**

TCH has received its first ever paragraph 54f order, these orders are intended to address concerns wider than the determinations on the individual case. The order issued by the Ombudsman required TCH to check its records for accuracy around known improvements in the resident's property, confirm work on a former property had been completed, review our policy, procedures and training on damp and mould and review our complaints procedure in regard to complaints about outstanding repairs.

A full report setting out our response to each point and detailing the changes made was submitted to the Executive Management Team for approval before sharing with the Ombudsman.

2.4 As part of the Ombudsman's wider powers, they can issue Complaint Handling Failure Orders (CFHO), these are issued when a landlord fails to undertake actions as directed by the Ombudsman which can include providing a complaint response to a resident, providing requested information to the Ombudsman and complying with Orders made as part of a determination. TCH has not received any CHFO's during the period of 2024/2025.

2.5 As part of the Annual Complaints Performance and Service Improvement Report the Ombudsman requires landlords to include a review of the Landlord Performance Report it publishes for all landlords that have more than 5 determinations issued in a financial year. Due to the date the Ombudsman publishes its reports, the most recent performance covers the period of 2023/2024, please see the attached **Appendix 2**.

Ombudsman Performance Report 2023/2024 (Data refreshed in July 2024)			
Determinations	Total findings	Maladministration Findings (includes Service Failure)	Compensation Awarded
10	21	11	£4,042
TCH Records 2023/2024			
Determinations	Total Findings	Maladministration Findings (includes Service Failure)	Compensation Awarded
11	23	10	£3,992
There is a discrepancy in the data reported in the Ombudsman's report when compared against our records. One point to note is that in the Performance and Service Improvement Report for 2023/24, we said that we had received 9 determinations and 20 findings. However, this was missing two former Roseberry cases that were issued before we had aligned all reporting.			

We have manually counted all determination and findings made and cannot fully account for why the Ombudsman has said that it has issued 10 determinations, 21 findings and 11 findings of Maladministration when our records show 11 determinations, 23 findings and 10 findings of Maladministration. For the determinations and total findings what we have counted includes 3 findings of 'Outside Jurisdiction', 1 of which was the only outcome and 2 were separate findings but the Ombudsman report has only included 1 count of 'Outside Jurisdiction'. As for the findings of Maladministration which is a combination of Maladministration and Service Failure, we have reviewed all 11 reports and can only account for 10 findings of Maladministration which includes the two former Roseberry complaints. It may be worth noting that the Ombudsman has only published 6 of the 10 determinations. There is also a discrepancy of £50 in the amount of compensation the Ombudsman has said they awarded. When counting the amounts awarded, we do not include any amount that we have offered or paid as part of our complaint response. However, if these amounts were included it would be an additional £300 on the amount the Ombudsman has recorded. As last year was the first time that the Performance Report and the Annual Performance and Service Improvement Report were in place and given the period that the Ombudsman Landlord Performance Report is published it wasn't possible to do a proper review last year that could have led to us challenging the figures. This should be possible when the report for 2024/2025 is published by the Ombudsman.
Lessons learned From Determinations
Reviewed and updated our Permanent and Temporary Decant forms Created a new role to provide greater support and monitoring of complaints and timescales

3 COMPLAINT LEARNING

3.1 Of the 27 cases we received determinations on from the Ombudsman, 15 had a finding of either maladministration or service failure in regard to complaint handling. These outcomes were mostly based on the timescales to respond to complaints and the lack of acknowledgement or compensation. At the point that these determinations were received and accounting for the time it had taken for the Ombudsman to review the case, TCH had already implemented the learning that came from these outcomes as part of our continuous review and improvement programme. These included an update to the compensation policy to include awards specifically for complaint handling, refresher training to all complaint handlers, changes to our complaints system to provide complaint handlers and managers clearer oversight of complaint timescales. Improvement in our performance of case closure times at stage 1 across the year reflects this.

3.2 In response to the determination of severe maladministration we have updated our decants policy, implemented a project management approach for complex repairs and implemented changes to our record keeping ensuring better continuity for when there are unexpected staff absences.

3.3 Of the 27 cases the Ombudsman issued determinations on, 9 of them had findings relating to leaks and damp and mould, including the severe maladministration. The learnings from these cases have been used to implement the changes set out in TCH's response to the determination of severe maladministration and the section 54f orders.

3.4 In addition to changes following Ombudsman feedback, we have implemented other changes from complaints and other sources.

Key Lessons Learned from Complaints 2024/2025		
Lesson/Feedback	**What we did**	**Impact**

Repeat errors in service charges relating to bulk waste causing residents to raise the same matter each year.	Carried out a review of the process and identified multiple points for improvement including working with contractors to correct the coding of sites, installing CCTV, fitting signage at properties that have raised these issue to identify sites in pictures, working with our Customer Services Team to help better address these matters when first received.	In progress – Will be measurable when Actual's statements are issued in September 2025
Residents not receiving prompt responses from individual complaint handlers due to leave and other absences.	Changed our process so that all complaint correspondence is sent from a mailbox so all responses come to a central point and are not missed or delayed.	Less escalations or update requests being missed.
Lack of updates and no clear point of contact for repairs works.	Repairs supervisors meet weekly with the Repairs Complaint Coordinator to provide updates on outstanding repairs associated with complaints so that there is a clear contact point for updates.	Under review
Lack of updates and no clear point of contact for repairs works.	Use of tasks on Complaint cases to monitor ongoing actions post response. This provides better management of actions and updates by the point of contact and ensures a clear record is available and can be monitored.	Under review
ASB process not being followed correctly.	Refresher training was delivered to all staff that manage ASB cases on the reason and importance to creating and adhering to action plans.	No failures identified as part of complaint since training.
Lack of resident voice in complaints process.	In March 2025 we launched a Residents Complaints Panel with the purpose of including residents in helping to shape the complaints process.	First meeting was successful and has provided helpful feedback to update the Satisfaction Survey questions

4 Addressing the root causes of complaints.

Using the feedback from Ombudsman Determinations, Customer Satisfaction Survey Feedback, Formal Complaints and Lessons Learned Reviews, we have put a heavy focus this year on improving our systems to ensure they reflect the requirements of the Complaint Handling Code and our Complaints Policy. Two of the most consistent themes in complaints are lack of communication and not delivering on what we said we would do. In response to this we have updated our systems to provide clear tracking and oversight of actions that are agreed in complaint responses with the focus that these stay active until all actions are completed.

4.0 ANNUAL SELF-ASSESSMENT AND BOARD COMMENTS ON REPORTS PROVIDED

4.1 As of 1 April 2024, landlords are required to provide the following by 30 September 2025 to comply with the Complaint Handling Code:

- The annual self-assessment against the Code to ensure their complaint handling policy remains in line with its requirements.
- A qualitative and quantitative analysis of the landlord's complaint handling performance - this must also include a summary of the types of complaints the landlord has refused to accept.
- Any findings of non-compliance with the Code by the Ombudsman.
- The service improvements made as a result of the learning from complaints.
- Its actions following any annual report about the landlord's performance from the Ombudsman.
- Its actions following any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

4.2 Please see the attached **Appendix 1**, the Annual Self-Assessment against the Complaint Handling Code. There have been no changes made to the complaint handling code for this year. Therefore, we have updated the self-assessment to reflect all changes made to the TCH complaints process and system to better evidence our compliance with the code. We did not find any areas of concern in the self-assessment last year when we adopted the Peabody Group Complaints policy, and the Ombudsman did not raise any concerns as part of their Duty to Monitor.

4.3 The Board is required to provide a response confirming that they have seen and reviewed the self-assessment and accept the Annual Complaints Performance and Service Improvement Report 2024/25. As required by the HOS, the Board's response should include comments on this Complaints Performance and Service Improvement Report.

The Board is asked to agree that a response is prepared, incorporating any feedback, and agreed with the Member Responsible for Complaints, ahead of publication by the end of September 2025.

The Self-Assessment and Complaint Performance report, along with the Board's response, will be published on our website and submitted to the HOS directly no later than 30 September 2025, to comply with the Complaint Handling Code.