Meeting of:	Town and Country Housing Board
Meeting Date:	30 July 2026
Agenda Item No:	TBC
Title of Paper:	Annual Complaints Performance and Service Improvement Report 2025/26
Author:	Andrew Greenwell, Customer Feedback and Information Manager
Presenter:	Stuart Ilsley Operations Director
Action required	Approve

PURPOSE AND RECOMMENDATIONS

The Board is requested to:

- **NOTE** Complaints Performance for 2025/26.
- 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 submission 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:

✓ Better services for residents	☐ Better homes and places
☐ Better together for colleagues	

DOES THIS REPORT INCLUDE TOWN & COUNTRY HOUSING (TCH)?

✓ Yes	☐ No

If no, please explain what arrangements apply at TCH:

RESIDENT IMPACT/ ENGAGEMENT/ INSIGHT ASSESSMENT

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.

COLLEAGUE AND CULTURE ASSESSMENT

TCH are always promoting a positive complaints culture and view complaints as a positive as this is the resident voice in action. It is also important that we recognised the impact increased volumes of complaints has on colleagues and the need to provide support and development. This paper highlights changes made in response to complaints.

ESG (ENVIRONMENTAL, SOCIAL AND GOVERNANCE) ASSESSMENT

This report has a positive social and governance impact by strengthening complaint handling, improving services for residents, and ensuring lessons learned are embedded into service improvements. The recommendations support transparency, accountability and compliance with the Housing Ombudsman's Complaint Handling Code, enhancing good governance. While there are no significant direct environmental impacts, the focus on service improvement, resident

engagement and effective resource management supports the organisation's wider sustainability objectives.

RISK, COMPLIANCE AND ASSURANCE

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.

FINANCIAL IMPLICATIONS AND VALUE FOR MONEY

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

REPORT REVIEW PROCESS

EMT have reviewed and agreed this approach.

APPENDICES

Appendix 2 - Complaints Handling Code - TCH Self Assessment Form 2026

Executive sponsor: Chief Operating Officer and Deputy Chief Executive Officer, Elly Hoult

1. COMPLAINTS PERFORMANCE 2025/26

1.1 COMPLAINT VOLUMES: The table below displays the volume of complaints received and closed during the year 2025/26.

Complaint Volumes 2025/26													
RECEIVED	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Jan**	**Feb**	**Mar**	**TOTAL**
Stage One	41	63	55	59	75	69	76	75	122	146	113	155	**1049**
Stage Two	17	17	20	28	21	24	24	23	23	25	35	40	**297**
Total	**58**	**80**	**75**	**87**	**96**	**93**	**100**	**98**	**145**	**171**	**148**	**195**	**1346**
CLOSED	**Apr**	**May**	**Jun**	**Jul**	**Aug**	**Sep**	**Oct**	**Nov**	**Dec**	**Jan**	**Feb**	**Mar**	**TOTAL**
Stage One	39	46	61	63	50	68	71	76	90	101	103	136	**904**
Stage Two	18	19	21	20	21	20	29	25	15	30	20	39	**277**
Total	**57**	**65**	**82**	**83**	**71**	**88**	**100**	**101**	**105**	**131**	**123**	**175**	**1181**
Number of properties							**13,597**						
% of complaints received per property							**7.71%**						

We experienced a 22% increase in the number new of complaints received in 2025/26 compared to 2024/25. We reported a 28% increase last year compared to 2023/24. We have always understood that the number of complaints received year on year is going to increase as awareness and confidence in using the complaints process grows through promotion by TCH, the Regulator and the Ombudsman. Given the challenges we have faced as a service this year, the overall increase in complaints being received has not been as high as last year and therefore does not represent a significant failing in our service as a whole. However, while we continue to receive complaints about complex matters such as damp and mould, we have seen an increase in complaints from other areas of the service. Complaints about Heating and Hot Water and Estate Services have been a driver of this and coincides with changes to contracts implemented in the year.

The number of cases being escalated to stage 2 for the financial period of 2025/26 was 28% whereas the previous year 29% of cases received escalated to stage 2. While overall, the number of cases being escalated has increased, the proportion of escalations has decreased slightly against the number of complaints being received. Outstanding Repairs continue to be the main complaint category associated with the escalations. However, we have seen an increase in Heating and Hot Water, ASB and Estate Service complaints being escalated. The increase in Heating and Hot Water escalations is linked to the incumbent contractor in Kent being merged into a larger contractor and subsequent service issues. Whereas the increase in Estate Services escalations is connected to the re-procurement of the estate services contracts. Overall, our complaint uphold rates remain stable and we are clear that the root cause is failure demand, most commonly around failure to deliver repairs within advertised timescales, failure to communicate effectively around delays and other issues and failure to respond to complaints within policy, and complaint handling code requirements.

TCH has restructured the complaint handling resources of the Contracts and Compliance and Repairs team by creating a single team responsible for all the complaints the individual teams dealt with at stage one. As part of this restructure, an additional Complaints Officer was

recruited to the team. Additional stage 2 handlers have been recruited from across the organisation's managers and, in addition to these, a new Complaints Investigator role was created with the purpose of being a dedicated stage 2 complaints handler. Plans for the new year include recruiting two additional temporary Complaints Investigators as well as an apprentice for the Complaints and Feedback Team.

As part of the move to bring our repairs service in-house we have also restructured the Repairs management team and created a specialist Damp & Mould team to more effectively address damp and mould issues in line with existing and further upcoming Awaab's Law requirements. The repairs team is currently reviewing processes to ensure that they are fit for purpose and addressing areas of service delivery failure highlighted by complaints and other feedback.

There have been 70 complaint request cases in 2025/2026, which after review have been addressed through our 'not a complaint' process. 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 something that had or was already being addressed through the complaints process, these were mostly raised through the My Home Online Portal. Clear written explanations have been provided to the customer, and recorded on our systems, in each of these cases, with guidance about how customers can contact the Ombudsman to review these decisions.

1.2 TOP FOUR SERVICE AREAS: The table below lists the top four service areas which drive 93% of new complaints. We would normally report on the top Five areas but all other areas of the service only generated 2% each with no one area standing out.

Service Area	Reasons for Complaints	% of cases
Contracts and Compliance	***Heating and hot water*** related issues have been the main driver of complaints received, with missed appointments and failure to complete repairs. This has accounted for nearly half the complaints received by this service area and has been a continuation of the disruption caused by the merger of Swale into Sureserve. ***Outstanding Repairs*** was the second most prevalent concern, with complex and ongoing works being the cause. However, this has seen a reduction compared to previous years.	43%
TCH Repairs	***Outstanding repairs*** continues to be the largest source of complaints in this area, works being completed outside of policy timescales being the recurring theme. ***Damp and mould*** **issues** were the second most common theme, with a similar theme of works not being done within policy timescales reoccurring.	22%
Housing Management	***Estate Services*** was the most frequent issue reported, highlighting issues with contractors that provide the service. **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.	21%
Asset Investment	The most frequent issue raised was related to ***kitchen and bathroom replacements****,* which has been a consistent part of	6%

	annual reporting and was connected to changes with the contractors**.**	

Works being done outside of policy timescales has been the root cause of the majority of complaints. However, communication continues to be a primary theme being identified. However, this has seen a reduction compared to the previous year.

1.3 COMPLAINTS PERFORMANCE MEASURES: The table below displays our performance against complaint measures for the year of 2025/26 with individual quarters and the overall total.

Complaint Measures 2025/26					
	Q1	**Q2**	**Q3**	**Q4**	**2025/26 Total**
1) % of complaints escalated to Stage 2	34%	36%	26%	24%	**28%**
2) % of complaints upheld at stage 1	65%	69%	70%	73%	**70%**
3) % of complaints upheld at stage 2	64%	66%	61%	64%	**64%**
4) % of stage one complaints responded to within 10 days (or 20 days with extension)	86%	87%	86%	69%	**80%**
5) % of stage two complaints responded to within 20 days (or 40 days with extension)	86%	82%	78%	82%	**82%**
6) Customer Satisfaction % with complaint handling	41%	42%	37%	56%	**47%**

Summary of our complaints performance:

1) **Stage two escalations**: 28% of our stage one complaints were escalated to stage 2 in the last financial year. This is 1% less than the previous financial year. While overall complaints volumes increased in the last year the volume being escalated shows and improvement in resolutions at stage 1.
2) **Complaints upheld**: 70% of stage 1 complaints have been upheld across the year. This has increased by 3% compared to last year.
3) **Stage 1 Response rates**: Our complaints response rate has significantly improved in the last year. Part of this is the redesign of our reporting to more accurately capture the timescales of complaints and to reflect when the response is sent rather than when the case is closed on the system.
4) **Stage 2 Response rates:** Stage 2 response rates have also improved significantly and remained constant throughout the year.
5) Whilst response rate performance is positive, we recognise the importance of speed of service to complainants. Extensions are sometimes necessary to ensure thorough investigation and careful collation of information in more complex cases, enabling us to deliver comprehensive and high-quality responses. We have identified opportunities to reduce reliance on extensions, particularly at Stage 1, and have already strengthened our staffing resources to support this. In addition, the 2026/27 Complaints Improvement Plan will have a focus on enhanced oversight and monitoring of extension requests, helping to ensure they are used only where genuinely required to support effective investigations, meaningful resolutions, and the best possible outcomes for residents.
6) **Customer Satisfaction**: Satisfaction with complaint handling as measured by transactional surveys saw an overall improvement this year. The survey questions were reviewed with

the help of residents to provide clearer questions that focused on the complaint handling rather than the complaint itself which has seen more focused feedback being received.

2. HOUSING OMBUDSMAN DETERMINATIONS RECEIVED 2025/26

2.1 **DETERMINATIONS RECEIVED**: The table below presents a breakdown of the 28 determinations received from the Housing Ombudsman (HOS) from April 2025 to March 2026 as well as the individual findings issued in those cases. The figures from 2024/2025 are also included for a year-on-year comparison.

	Determinations		Case Findings	
TCH	**2025/2026**	2024/2025	**2025/2026**	2024/2025
Out of Jurisdiction (OOJ)	**0**	3	**3**	5
Reasonable Redress	**3**	4	**14**	6
No Maladministration	**4**	1	**12**	8
Service Failure	**6**	5	**15**	15
Maladministration	**14**	13	**19**	20
Severe Maladministration	**1**	1	**1**	1
Total (ex OOJ)	**28**	24	**61**	50
MAL rate - (SF + Mal + Severe Mal)	**75%**	79%	**57%**	72%

The 28 determinations have a total of 64 individual case findings. This is because one determination can have multiple findings. Out of the total individual case findings, 19 were maladministration, 1 was severe maladministration, 15 were findings of service failure, and 12 were no maladministration, 14 were reasonable redress and 3 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**
Paragraph 54f orders are intended to address concerns wider than the determinations on the individual case. TCH has not received any Paragraph 54f orders during 2025/2026.

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 2025/2026.

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 has historically published its reports, the previous reviews have always been on the year prior to the data reviewed in this report. However, while the Ombudsman will not be publishing the report until September 2026, they have provided the data that will be used in the report, data has been verified.

Therefore, this year we will be able to review the Ombudsman's Landlord Performance Report for 2025/2026 alongside our 2025/2026 performance.

Ombudsman Performance Report 2025/2026			
Determinations	Total findings	Maladministration Findings (includes Service Failure)	Compensation Awarded
28	64	35	£21,260

TCH Records 2023/2024			
Determinations	Total Findings	Maladministration Findings (includes Service Failure)	Compensation Awarded
28	64	35	£7,960

When the Ombudsman shared the data ahead of publishing the report we found 2 minor differences in the data, when we shared this with the Ombudsman, they confirmed they were errors in their data and corrected these.

For the financial year 2025/2026 we recorded a maladministration rate of 57% which matches the data provided by the Ombudsman. This is an improvement over 2024/2025 where the Ombudsman recorded a 71% maladministration rate.

When the Ombudsman reports compensation in its annual report, the total amount they report includes any amounts offered by TCH as part of the complaints process. They also provide a breakdown separating out what they have ordered and what is recommended, the recommended amounts are what landlords have already offered as they are recommending this be paid if it has not already. For this year the Ombudsman has provided a breakdown of what they have ordered and what they have recommended which is:

Ordered: £10,752
Recommended: £10,508
Total: £21,260

When comparing our records, we have found that we have recorded that the ombudsman has ordered £7,960 which gives a difference of £2,2792. The data the Ombudsman has provided only shows the total per case and not a breakdown so it is not possible to determine where the Ombudsman may have recorded something as an award vs recommendation. It should also be noted that the Ombudsman changed the format of their reports in October 2025 and in some cases prior to and during the transition the orders were worded in different ways for example and amount ordered replaced a previous offer instead of increasing the amount offered. This suggests higher amounts could have been recorded as an order vs a recommendation. From January 2026 onwards we started to see more consistency in their orders, but this is the likely cause of the discrepancy.

Lessons learned From Determinations

27 of the findings issued in 2025/2026 related to responsive repairs and these findings were mostly about the time to progress repairs in line with our Responsive Repairs Policy and keeping residents updated. The majority of cases determined were about complaints that had been responded to more than 12 months prior to the determination.

In July 2025 following a full review of our Responsive Repairs delivery, TCH implemented the decision to change the repairs service provider from a joint venture to a Direct Labor Organisation (DLO). Determinations made by the Ombudsman were included in the review that led to this decision.

In November 2025 ASB and Safeguarding procedures were created and in response to a determination made in June 2025, clear steps for supporting the party that reported a safeguarding concern was added to these in direct response to the Ombudsman determination.

3 COMPLAINT LEARNING

3.1 Of the 64 findings issued by the Ombudsman, there were 9 Service Failures and 4 Maladministration findings related to complaint handling which is an improvement over the previous year where a total of 21 finding of maladministration or service failure were issued. These outcomes continued to be around the timescales to respond to complaints and the lack of acknowledgement or compensation. These cases related back to early 2024 which was around the time that we updated our Compensation and Remedies Policy to provide clearer guidance on compensation related to complaint handling. Where determinations were made on cases responded to by TCH in later 2024, the Ombudsman found findings of Reasonable Redress or No Maladministration.

3.2 TCH received its second ever determination of severe maladministration. This case was about the handling of an intermittent roof leak and the amount of time the matter had been ongoing. The finding of Severe Maladministration was in response to the timescale involved and the long-term cumulative impact to the resident rather than a specific point of failure or significant impact. The outcome was also based on the compensation offered by TCH not being sufficient. Unlike the first Severe Maladministration, there was no order to carry out a review to be reported to the executive team.

3.3 Of the 64 findings the Ombudsman issued, 27 of them had findings relating to the responsive repairs service, including the severe maladministration. The key points raised by the Ombudsman in these cases were that repairs were not being completed within the timescales set out in our Responsive Repairs Policy. The learnings from these cases have been used to support the decision to change to a DLO and to support the implementation of a long-term repairs' improvement plan.

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

Key Lessons Learned from Complaints 2025/2026		
Lesson/Feedback	**What we did**	**Impact**
Residents being chased for missed gas service appointments when they were available but the contractor did not arrive at the appointed time.	We carried out a review of the process and letters that are sent to make sure they are using the appropriate tone and that the missed appointment was not the contractor's fault. Updated letters were created and a process to check all missed gas safety appointments created.	Reduction in these types of complaints
Residents were not aware of what works were being done when they were decanted to carryout repairs.	Created a process map that formally includes providing residents with details of the works.	Clearer information provided to residents and reduced the need for complaints.

Repairs service changed to a DLO	We switched our repairs service to a DLO in order to provide greater investments in the service and improve the service being provided, with a particular focus on improved communication and customer service. Complaints volume and themes of complaints were a key driver of this decision.	A new Repairs Service.
Residents were providing dissatisfied responses to Complaint Transactional Surveys, but the dissatisfaction expressed was with the cause of the complaint not the handling	We reviewed the questions being asked in our complaints' surveys alongside a panel of residents and updated the questions to better reflect the point of the survey.	Complaint handling satisfaction improved and met target for the year.
Resourcing within the repairs service	As part of the change to a DLO, the repairs resources within C&C and Repairs were structured into one team and additional resources included.	One team better able to support each other, resident and remove any silo mentality.
Poor service delivery and communication from our Heating & Hot water contractor in Kent	We have reprocured the contracts and addressed issues of service delivery/customer service in the procurement process. During the transition phase this will need to be monitored.	The new contracts are very clear about service delivery expectations and processes for early action to address any failures.
Properties are being advertised as available while still awaiting repairs works in void stage.	A review of the voids process was started to consider whether it was still appropriate to advertise properties before the repair works were completed. The action was subsequently incorporated into a Major Projects Board review of the voids process.	Would reduce the risk of tenancy's beginning were works have not been completed.

3.5 In addition to our own learning, during 2024/25, TCH also undertook a review of all relevant publications, spotlight reports and learning reports issued by the Housing Ombudsman Service, including learning from severe maladministration reports, to ensure that our approach to complaint handling reflects emerging good practice across the sector. Each publication was reviewed to identify key learning points, which were then discussed with the relevant subject matter experts to assess our current position and record how our approach aligns with the learning highlighted. As a result, we have strengthened our governance and assurance arrangements, enhanced oversight through the Member Responsible for Complaints, and embedded a more structured approach to recording, monitoring and reporting service improvements arising from complaints.

This learning has reinforced the importance of using complaints as a strategic source of insight rather than solely as a measure of service failure.

Actions taken during the year have included strengthening ownership of complaint learning, improving the way lessons learned are shared with colleagues, residents and governance committees, and ensuring that recurring themes are reflected within wider service improvement programmes. A brief summary of relevant Housing Ombudsman publications, together with TCH's assessed position and any actions required, is now circulated to Leadership Group through the monthly policy briefing document. This has helped provide greater visibility of learning, support more consistent oversight, and ensure that complaint insight informs operational planning. Particular focus has been placed on addressing root causes, improving communication with residents, enhancing accountability for delivery and ensuring that learning from complaints leads to meaningful and sustained service improvement.

4. Addressing the root causes of complaints.

Using the feedback from Ombudsman Determinations, Customer Satisfaction Survey Feedback, Formal Complaints and Lessons Learned Reviews, we continue to focus on responding to complaints in line with the policy and where this has not been possible have clearly recognised this and ensured that delays are explained and appropriate compensation offered in line with the Compensation and Remedies Policy.

We continue to work to address the failure demands identified as the root cause of many of our complaints adding additional staffing resources to both the Repairs and complaints handling teams, whilst reviewing policy and process and implementing ongoing training and guidance to reinforce the importance of compliance with policies and procedures, ensuring training is targeted to individual teams and colleagues where necessary.

The Repairs Service is identified as the root cause of the majority of current complaints. The need, in part identified by complaints and other feedback, to provide improved processes, better case management and greater investment in the service for our residents led to our ending our joint venture delivery approach and taking the service in house, launching the DLO in August 2025. A Repairs Improvement plan has been developed to be implemented across 2026/2027 in which lessons learned from complaints are being incorporated.

We have also developed a complaints improvement plan, which has been approved by our Resident Experience Committee. The plan focuses on preventing service issues escalating to the complaint stage, introducing measures to improve communication and the customer experience. Where issues do become complaints, the plan aims to ensure that they are always dealt with promptly and effectively with a resolution focused approach, introducing more monitoring and oversight, including from engaged residents, via our Resident Voice Panel, who are also supporting on delivering some of the plan's goals by reviewing 'touch points' within processes from the resident perspective.

5. ANNUAL SELF-ASSESSMENT AND BOARD COMMENTS ON REPORTS PROVIDED

5.1 As of 1 April 2024, landlords are required to provide the following by 30 September 2026 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.

5.2 Please see the attached **Appendix 2**, the Annual Self-Assessment against the Complaint Handling Code. There have been no significant changes made to the complaint handling code for this year as there have been no changes to the code, policy or process that warrants. Only minor changes to wording have been implemented.

In preparation for Board review the Self-Assessment has been shared with the Resident Voice Panel for review, they have not suggested any revisions but have commented on the length and format of the document, which is prescribed by the Ombudsman.

As part of this year's Self-Assessment, we considered the Ombudsman's Duty to Monitor Learning Report published in July 2026. This report highlighted learnings made by the Ombudsman when considering landlords submissions and providing direct feedback. These learnings focused on examples of late submission and complaint policies not being in line with the code. TCH has not received any direct feedback from the Ombudsman regarding previous self-assessments or the Complaints Policy and feel that we have already applied all of the learnings identified in the report.

5.3 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 2025/26. 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. It should be noted that we have not received any feedback from the housing Ombudsman on the previous submissions for the last two. Based on sector feedback we have assumed that they are acceptable to the Ombudsman as they have not shared any concerns with us about the previous submissions. This has however not been confirmed by the Ombudsman.