The "combined Trusts'" Residents Scrutiny Panel Complaints Scrutiny Report October 2025

Our Partners:

- Sir Josiah Mason Trust (SJMT- www.sjmt.org.uk)
- Yardley Great Trust (YGT- www.ygt.org.uk)
- Lench's Trust (www.lenchs-trust.co.uk)
- Solihull Care Housing Association (SCHA - www.scha.org.uk)
- Harborne Parish Lands Charity (HPLC- www.hplc.org.uk)
- Broadening Choices for Older People (BCOP- www.bcop.org.uk)

Background

1. What is the Scrutiny panel, why was it formed and what will it do?



The Panel consists of residents drawn from the above Registered Providers who help to scrutinise the quality of services from their unique perspective as residents.

The Panel have been meeting formally from April 2025, supported by a paid facilitator, Emma Wilson from Yvonne Davies Consultancy (YDC). Emma met with most of the volunteers ahead of the April 2025 deadline and residents (and some staff members) benefitted from some training on modern methods of scrutiny, the Regulatory environment and the role of the Panel. The Panel developed a Code of Conduct and Terms of Reference.

We agreed to continue to meet monthly (with the exception of August) to progress tasks and met in person at a different scheme each time where lunch and a tour of each provider's accommodation and services was also appreciated.

Some of the RSP members met in between meetings and carried out additional work preparing bulletins for wider residents, attending coffee mornings and distributing and collecting surveys. The residents also benefitted from WhatsApp groups and email communication in between the monthly meetings.

We had some residents decide that the Panel wasn't for them or didn't attend regularly enough to keep up with the pace, however we acknowledge that scrutiny isn't for everyone and it's hard work at times. Working in the task and finish groups suited some but not others and complaints is a challenging subject. We will hold a session in the new year to learn from our first project and apply that learning to the next project to try and ensure residents remain motivated.

Over the next two years the RSP have been tasked to undertake a number of scrutiny projects intended to critically examine services from a resident perspective and to comment on the effectiveness and efficiencies of these services, to identify any deficiencies or weaknesses (as well as highlighting and applauding examples of best practice) and making suggestions for service improvement were applicable.

In essence, the scrutiny panel aims to act as a critical friend to the providers using their own experiences and data gathered from residents to ensure that sheltered housing effectively serves its intended purpose of providing safe, supportive, and independent living environments for vulnerable groups and drive positive changes in service delivery. Hence the need for members of the RSP to be drawn from such diverse backgrounds so that a broad variety of experience, knowledge, skills and insights can be accessed, good practice can be identified and reported upon.

Role of the Scrutiny Panel:

- To take an independent, residents' view of the organisation's performance
- To collect and critically evaluate evidence on the agreed service areas under review
- To provide ideas and recommendations for the organisation's to shape and improve services, including sharing good practice between the combined trusts
- To work in partnership with staff and trustees to implement the scrutiny panel's recommendations to improve services

Our aim is to ensure:

- Our recommendations are fair and deliverable
- We treat residents equitably and follow a transparent process
- That the RSP learns from our first project and continually improves

We hope the outcome of the RSP's work will help:

- improve Tenant Satisfaction Measures (TSM's)
- improve visibility and accessibility of complaints including addressing vulnerability issues
- Ensure establishment of a positive complaints culture
- improve awareness and communication of complaints

Introduction – Why choose complaints?



The RSP chose complaints as their first scrutiny project as complaint handling was the lowest scoring measure in the Tenant Satisfaction Measures 2023/24 for some of the providers, though unusually 100% for HPLC.

As registered providers, all of the partners are governed and regulated by the Regulator of Social Housing (RSH) and under the new Social Housing Regulatory Act, from 2024 onwards, they must record performance against TSM's. The TSM's are a set of standardised perception questions to find out how satisfied residents are with the services provided.

The table below shows how each organisation performed 2023 and how they compare with other small providers. (where there are N/A, this is because there had been no formal complaints with that year).

TSM	Lench's 2023	SJMT	YGT	BCOP	SCHA 2023	HPLC	Comparison with all small providers
TP09- Satisfaction with the landlord's approach to handling complaints	56%	N/A	N/A	21%	36%	100%	58%

We also knew the Panel could add a resident's perspective to the complaints process and with the wider complaints service.

Complaints is a subject which residents feel strongly about, so if we can identify any strengths, highlight any improvements we can make together with the Trust's that should then benefit wider tenants and increase satisfaction.

Additionally, in light of the recent changes by government to regulate complaints by the Regulator of Social Housing and the Housing Ombudsman, the complaints service seemed the highest priority scrutiny area.

This report summarises our approach, what we found, our recommendations and what we would like to happen next to share this report with each Provider's Trustees.

Regulatory Requirements

The Regulator of Social Housing (RSH) is the government body responsible for setting, monitoring and regulating consumer standards for social housing in England. One of the many RSH requirements that landlords **must** report on and have **a duty to act** upon is tenant satisfaction feedback.

The Tenant Satisfaction Measures (TSM's) are a helpful perception survey used by all providers to test performance at least every 2 years.

The Housing Ombudsman Service

In the year ending March 2025, the Housing Ombudsman investigated 6,380 complaints, an increase of over 470% compared to 1,111 in 2020, with property condition being the most frequent cause for complaints - a worrying significant increase over previous years.

Though this figure encompasses all social housing complaints the sheltered housing sector represents a significant proportion of this number. The precise 2025 figures for sheltered housing complaints is difficult to determine and isn't specified accurately by the Ombudsman. Notwithstanding this, the overall trend shows a sharp rise in investigations, driven by issues such as repairs and, more recently, antisocial behaviour and safeguarding concerns.

Complaint handling was the second most complained-about area, making up 20% of complaints. Meanwhile, measures of resident satisfaction have been reported to be at the lowest levels in years and incidentally the levels of dissatisfaction with the outcome of complaints/resolution processes registered by the Press have skyrocketed.

Whilst, the number of complaints successfully handled by each of the "combined trusts" has remained reassuringly low (typically < 30 p.a.). There is some evidence that within the combined trusts the number of complaints received is still slowly rising and from our face-to-face interviews there is evidence that tenant satisfaction is still high and perhaps is a lot higher than the annual satisfaction surveys indicate.

Housing complaints are historically difficult to resolve due to a combination of complex issues including, significant actual or perceived power imbalances between landlords and tenants, a lack of awareness of rights, and systemic challenges such as inadequate resources for landlords and fragmented resolution processes. Complaints are often an emotive subject which residents feel strongly about and from the Trust's point of view are often difficult to resolve in a timely and cost effective fashion whilst still retaining an amicable relationship with the customer and other stakeholders. Historically, the complaints/resolution process is still largely viewed as an antagonistic and confrontational process, and conducted accordingly. It is obvious that such a pervasive attitude is unhelpful and may even be counterproductive.

The "combined trusts" recognise this and part of the scrutiny panel's job is to identify "problems" and suggest potential solutions. Any stigma overshadowing the complaints/resolution process should be minimised and steps taken to ensure that a well-run, fit-for-purpose, person-centered service is produced. Ultimately, any changes to complaints/resolution process should be considered a potential learning opportunity that drives a positive local complaints handling culture which would enhance local service provision.

With the proper approach, residents' complaints can be resolved peacefully. A clear comprehension of the problem, active listening, and solution-finding are necessary for resolving the issue effectively. Effective complaint handling involves clear communication, consistency, fairness in approach, and adherence to the Ombudsman's Complaint Handling Code.

The Housing Ombudsman's published its Corporate Strategy document in July 2025 (2025-2030) entitled a "healthier homes, fairer services, trusting relationships" with a mission of "improving landlords' services and residents' lives through housing complaints". The Ombudsman's stated

strategic objective is to generate a code for complaints handling/resolution that "provides an excellent person-centred service" that "drives a positive local complaints handling culture" and with their stated willingness "to extend our powers and engage with partners to support closing gaps in redress".

Why effective Complaint Handling Matters?

Handling residents' complaints is an integral part of providing excellent customer service. By listening empathetically to residents, taking responsibility in sorting the problem, by apologising or offering more appropriate solutions, following up, and learning from complaints, disputes can be resolved fairly and maintain good resident/contractor/landlord relationships. By implementing these tips, businesses can turn disgruntled residents into loyal advocates and improve the landlord's reputation.

Effectively complaint handling is essential for building positive relationships with residents and promoting smooth management of homes. When residents' concerns are taken seriously and addressed promptly, it results in happier residents who feel valued and are loyal.

Timely complaint handling also prevents minor issues like leaks, pests, or maintenance problems from escalating into bigger, more expensive repairs. Being proactive protects the overall condition of the property and ensures a healthier home for residents. Furthermore, a reputation for fairness and responsiveness in dealing with tenant complaints helps property managers attract reliable, long-term tenants.

In addition, managing complaints well brings long-term benefits. It improves landlord and resident relationships, encourages open communication, and builds trust, making it more likely that any future problems are identified early and ideally pre-empted.

3. Our scope

1.1 The Resident Scrutiny Panel (RSP) decided to scrutinise the complaints journey and satisfaction for residents for the following reasons:

- In the recent Tenant Satisfaction Measures, Complaints had one of the lowest satisfaction outcomes
- The panel acknowledges that the complaints process service is an integral service for residents and would like to know if there are any improvements/ recommendations that can be made
- Look at the complaints policy and process and see if they are visible, accessible and correct or if improvements can be made
- To understand the customer experiences of the process

1.2 This document sets out the proposed scope of the complaints scrutiny.

2. Key Objectives

- Ensure a positive complaints culture in each of the organisations
- To improve the customer experience with complaints
- To improve the level of satisfaction with Complaints (and improved TSM satisfaction)
- Improve transparency, visibility and accessibility of complaints (inc vulnerability)
- Improved awareness and communication of complaints
- To work collaboratively across the 6 partner organisations and to learn from others and share experiences

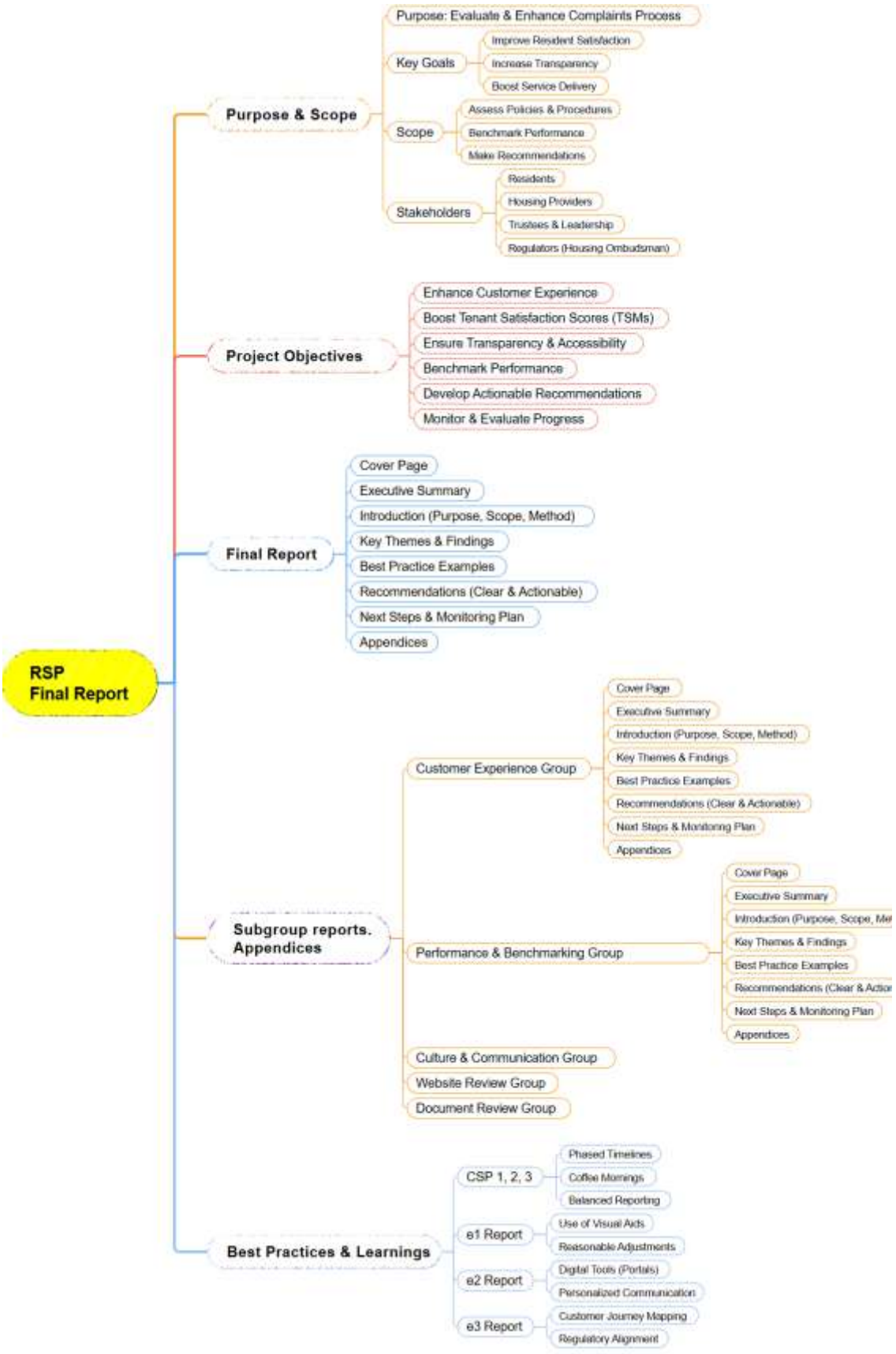
3. Out of scope

The following areas are out of scope for this review:

- Recommendations that directly contradict the Housing Ombudsman's Complaints Handling Code.

4. Approach

One of the report writing members developed the mind map below to guide us through the process.


RSP
Final Report
Purpose & Scope
Purpose: Evaluate & Enhance Complaints Process
Key Goals
Improve Resident Satisfaction
Increase Transparency
Boost Service Delivery
Scope
Assess Policies & Procedures
Benchmark Performance
Make Recommendations
Stakeholders
Residents
Housing Providers
Trustees & Leadership
Regulators (Housing Ombudsman)
Project Objectives
Enhance Customer Experience
Boost Tenant Satisfaction Scores (TSMs)
Ensure Transparency & Accessibility
Benchmark Performance
Develop Actionable Recommendations
Monitor & Evaluate Progress
Final Report
Cover Page
Executive Summary
Introduction (Purpose, Scope, Method)
Key Themes & Findings
Best Practice Examples
Recommendations (Clear & Actionable)
Next Steps & Monitoring Plan
Appendices
Subgroup reports. Appendices
Customer Experience Group
Cover Page
Executive Summary
Introduction (Purpose, Scope, Method)
Key Themes & Findings
Best Practice Examples
Recommendations (Clear & Actionable)
Next Steps & Monitoring Plan
Appendices
Performance & Benchmarking Group
Cover Page
Executive Summary
Introduction (Purpose, Scope, Me
Key Themes & Findings
Best Practice Examples
Recommendations (Clear & Actio
Next Steps & Monitoring Plan
Appendices
Culture & Communication Group
Website Review Group
Document Review Group
Best Practices & Learnings
CSP 1, 2, 3
Phased Timelines
Coffee Mornings
Balanced Reporting
e1 Report
Use of Visual Aids
Reasonable Adjustments
e2 Report
Digital Tools (Portals)
Personalized Communication
e3 Report
Customer Journey Mapping
Regulatory Alignment

The review will cover the following key elements:

- **Fact Finding:** reviewing service standards, policies, procedures and performance information, quality, and residents' views relating to the service, mystery shopping.
- **Challenge and Compare:** examining what other landlords do and try to identify good practice.
- **Recommendations:** analysing findings and making recommendations to the Trustees of each organisation and asking the key contacts at each partner organisation to produce an action plan demonstrating how our recommendations will be addressed.
- **Monitor and evaluate:** once we have an action plan, the Panel will monitor progress and evaluate outcomes for residents.

5. The Review Stages

The stages of the review are set out below-

Stage 1: **Planning and Preparation – May/June**

- Document review exercise
- Development of an agreed scoping document

Stage 2: Gathering the evidence and reality checks -July/August

For this review the main scrutiny activities could include;

- Reviewing of documents and performance data including TSM's
- Review of the policy and procedure
- Presentation & interview with the relevant Managers
- Interviews with relevant staff
- Benchmarking against similar sized housing providers
- Conversations with the panel members and residents that have recently been through the complaints process.
- Using coffee mornings to gather wider resident views

Stage 3: Review of evidence gathered - Sept/Oct

- Collation of all results and evidence gathered
- Draft report developed identifying positive practice and recommendations

for the service

Stage 4: Final Report Drafted – Sept/Oct

- Final report drafted by the Panel
- Review of draft report with the relevant managers for comment and feedback
- Final report to the Trustees for comment and approval

The Trustees will note that we are a little behind schedule, this is as a result of a change of plan to gather wider resident voices using a survey.

4. The Task and Finish Approach

The RSP quickly realised the size and scale of the project and decided to share the tasks out into task and finish groups with residents choosing a group that really played to their skills, experience and strengths and assigning a lead for each group. The task and finish groups are:

- Document review and performance and benchmarking
- Customer Experience
- Website review
- Culture and Communications
- Report writing

The table below sets out the individual tasks for each group: -

Task and Finish Group	Action	Tasks	Panel Members
Document Review and Performance and Benchmarking	Check current Complaints policy / procedure is compliant against code and is easily understood from a resident lens.	Read complaints handling code and policy and advise on compliance.	Eileen Sandra, Jonathan,Chris Margaret Stevens, Maggie (Auntie)
	Review Annual Complaints Performance Reports	Read and ensure it meets the HOS requirements and is shared to wider tenants.	
	Compare policy to best performing associations	Identify best performing associations. Compare policies and advise as to possible areas of improvement	
	Performance Review	Review TSM's and wider performance statistics in respect of numbers of complaints acknowledged and responded to within agreed timescales.	
Culture and Communications	Review any newsletters content on complaints	Review content and ensure that sufficient transparency and honesty in terms of satisfaction, trends, learning.	Chrissie, Val, Pat, Maggie, Pauline, Lynn, Chris, Barbara, Janice, Margaret W, Raymond and Diane

	Panel members to interview staff involved in receiving, processing, investigating and responding to complaints	Draft set of questions and circulate to team for agreement	
Website Review	Review HOS website and look at who is cited as best practice	Highlight strengths and how this could be applied	Matt, Sam and Bob
Customer Experience	Website mystery shopping	Log a complaint via the website and advise on ease of use, accessibility issues and experience generally	Cherry, Val, Betty, Vera, Cathy G, Jeanette, Chris, Maggie, Pat D, Barbara and Pat C.
	Hear from customers that have lived experience.	Talk to former complainants or carry out survey with wider customers.	

Website Review	Compare and contrast against complaints areas of other associations websites	Review a number of other housing association websites to identify areas of potential improvement in terms of customer interface, ease of use, accessibility, etc.	
	Review RSH website and who has been awarded C1 in recent inspections.	What can be learnt in respect of complaints from C1 landlords.	
Culture and Communications	Review sample of anonymised stage 1 and stage 2 responses from last 12 months.	Review through a tenant lens, are they clear, answer the complaint, provide sufficient redress, empathetic and learning.	
Report Writing	Review sample reports from other Scrutiny Panels using YDC document library.	Gather data from each Task and Finish Lead and produce report under sections following the scope.	Phil, Don and Bob

Our methods were fairly straight forward and involved a deep dive into the documents including the complaints policies and annual reports. We have considered the following questions:

- Can we easily find the relevant policy documents and can they be easily understood?
- Can we use them? How easy is it? How speedy was it? How is the complainant kept informed and involved?
- Review process of complaint logging and how well are complaints monitored from the initiation through to close.
- Can the process work in mystery shopper testing?

Interview of relevant management and front line staff:

- What was their experience? What was their attitude to the complaints process? Did they feel confident in handling complaints and did they feel supported during the process?
- Is there evidence of a positive culture of engagement with complainants and a "learning from complaints" environment?
- Do interviews and documentation provide evidence of ongoing training on the complaints policy and procedures?

7. Our Findings

Document Review

Generally, the RSP found that each Provider's complaints policies are compliant with the Housing Ombudsman's Complaint Handling Code and the Regulator of Social Housing's Consumer standards in relation to complaints.

Each policy is resident-centred and equitable and puts the residents needs first. The policies are:

- designed to get things right first time
- designed to ensure residents are kept informed and are in the loop all the time and ensure the landlords deliver on their promises
- complaints seem to be viewed by the landlord as a learning opportunity and is used to improve service delivery

The panel were pleased that a written copy of the complaints policy is included in all tenancy starter packs and is discussed during tenant induction. But the RSP felt there was a need for the complaints policy to have been emphasised a bit more during the induction interviews.

In most face-to-face interviews with new residents the RSP found that the new residents were often unsure of the policy and procedures around making complaints (in fact, in several instances the residents stated that as they left the induction meeting they were completely unaware of the fact that a complaints policy existed). This is probably because the information was "lost" in the blur of activity that goes on around moving in time and a lot of important information goes over the head of the new resident**.** We would recommend that scheme managers have a second a follow up visit 2-3 months' post moving to ensure new residents are really clear on how to complain and what the difference is between a service request and a formal complaint.

The Panel was pleased to find that each organisation provided a concise and clear definition of a complaint. Again, we also found easy links to descriptions of individual complaint policies.

We were also pleased with the provision of explanations of how to access the complaints procedure and found once accessed it was relatively easy to follow.

We would urge management to ensure that hard copies of any relevant documentation are readily available from scheme staff or copies placed in the libraries or other communal areas where all residents can easily access if they choose not to or can't access information digitally. We would also recommend advertisement of the complaints area on each website to ensure that those who would prefer to engage digitally can.

However, one problem that the RSP recognised was while it was understood there was a clear and essential need to satisfy the Ombudsman's and the Regulator's requirements, it should not be overlooked that there is also a need to satisfy residents requirements. This was often not the case in some of the language and style of the policies read. If the residents cannot follow the policy, they will not use it and this could result in some of the more vulnerable residents "living with a problem" rather than reporting it and getting it sorted.

In face-to face interviews, residents often told us that they were put off submitting a complaint because instructions were found to be too long and complicated (frequent quotes from residents included phrases like *"it was too hard to follow*", "*it's too complicated"* and on one memorable occasion "losing the will to live as they tried to make sense of the policy put me off" being one of the more extreme reactions).

It was generally thought most documents would be easier to understand if they were written in more straight forward language, and availability of a simpler version of the policy would be of great benefit to our more vulnerable residents. The Panel like BCOP easy read procedure detailed below.

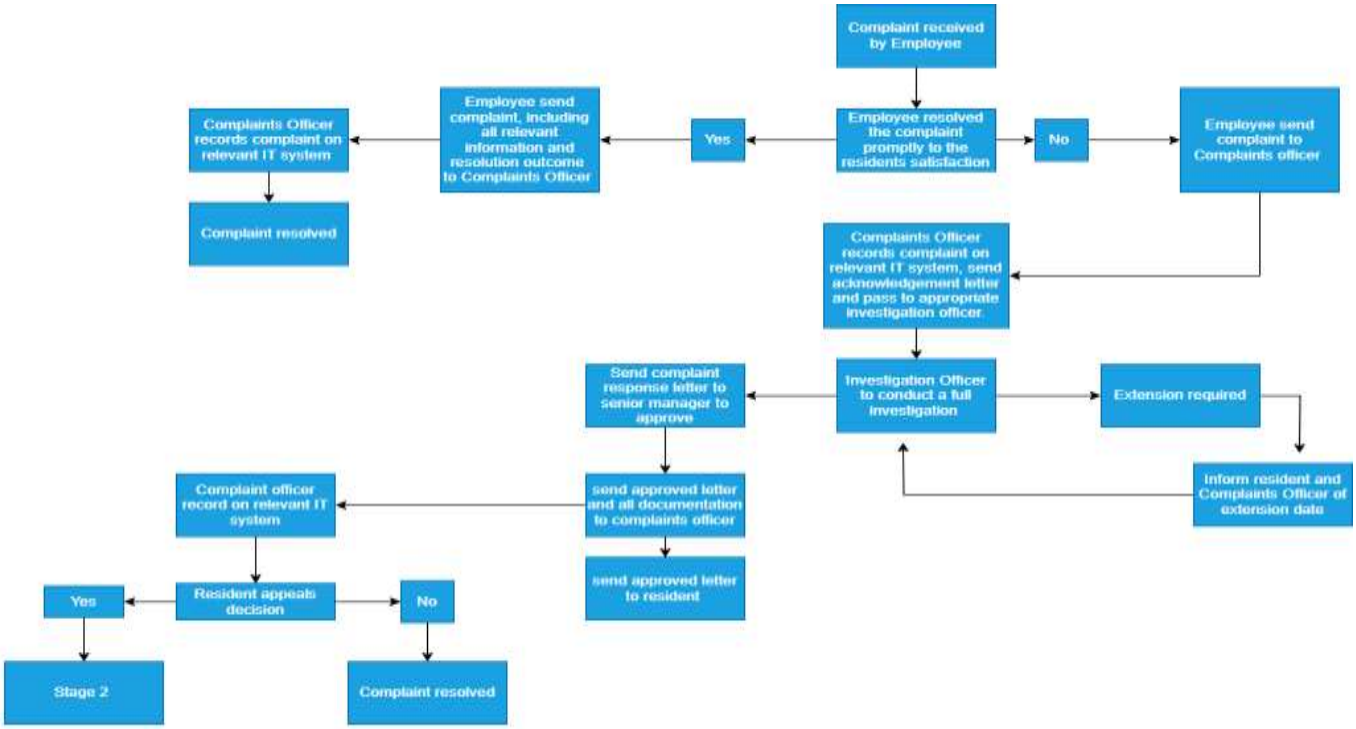
An added factor is that the proportion of our residents for whom English is not their first language is also rising and any potential communication issues need addressing.

The RSP was particularly impressed with the "*Complaints, Comments, Compliments: Policy & Procedure* " document (Pub Sept 2024) produced by HPLC is an example of good practice and really does provide a user friendly and usable explanation of the complaints policy.

Compliments-Complaints-Policy-Procedure.pdf

The RSP was impressed with "*Complaints & Compliments: Policy & Procedure* " document (May 2024) by Lench's Trust for both its clear and plain language and we particularly liked the **diagrams depicting the flow through the complaints process** (on pages 8 and 9) and following the "a picture paints a thousand words principle". The diagram (below) really are an aid to some residents understanding of the how any complaint will be considered and advanced through the system. The colours could be chosen more carefully to support customers with a

visual impairment to ensure greater accessibility.



BCOP Complaints process

We treat any expression of dissatisfaction as a complaint.
This helps us to log and respond to feedback about how we're delivering our services. Please don't hesitate to let us know if you think we're not meeting the standards you expect. We want to keep improving, so all complaints and feedback are helpful.
If you are telling us about something (like a repair) for the first time, this may be a 'service request' rather than a complaint. However, you can make a complaint if you feel we are not responding properly to a service request you've already made.

You can tell us in person by calling 0121 459 7670, by using our website: www.bcop.org.uk or by post: BCOP, Waterside House, Unit 3, Waterside Business Park, 1649 Pershore Road, Stirchley, Birmingham, B30 3DR.

Stage One

If you make a complaint, we'll log it and send you a letter confirming we've received it within 5 working days. The letter will tell you who will be dealing with your complaint, or why we cannot accept the complaint.
We may also contact you to find out more about what has happened.
We'll investigate your complaint and contact you with a response within 10 working days of acknowledging your complaint.
If we can't do this, we'll discuss the delay with you, and what you can do if you are unhappy.
If you are unhappy with the outcome of your complaint, you can ask us to look at the complaint again.

Stage Two

We'll send a letter confirming your complaint is being looked at again within 5 working days. The letter will tell you which senior manager is dealing with your complaint.
We may contact you to find out more about what has happened.
We'll investigate again and contact you with our final response within 20 working days of acknowledging your stage 2 complaint.
If we can't do this, we'll discuss the delay with you and what you can do if you are unhappy.

If you're unhappy at any stage you can seek further advice and support from the Ombudsman Services:

Residents of our nursing homes please contact the Local Government & Social Care Ombudsman

Phone 0300 061 0614
Website: www.lgo.org.uk
Post: Local Government and Social Care Ombudsman, PO Box 4771, Coventry, CV4 0E

Residents in our housing schemes please contact the Housing Ombudsman
Email: enquiry@ombudsman-services.org.uk
Phone: 0330 440 1614
Website: www.housing-ombudsman.org.uk
Post: Housing Ombudsman Service PO Box 1484, Unit D, Preston, PR2 0ET

GH March 2025

BCOP our care comes from the heart

The panel were satisfied that the self-assessments against the Housing Ombudsman's Complaint Handling Code have been completed and published on each organisation's website. The RSP found that from the residents' point of view they could be easier to find. We also felt that in most circumstances these submissions were of questionable value since they had a tick-box feel about them and were actually just communicating what the Ombudsman needed/wanted to see/hear, knowing that they would not be checked in any detail and pay little attention to the actual real world realities.

Therefore, the RSP feel that when completing the self-assessment, we would encourage the trusts to complete these with residents in partnership to ensure that it is a true reflection of the state of play in complaint handling service. By taking this approach, landlords can demonstrate to regulators that residents have actually been consulted and are content with the landlord's assessment of service delivery.

Perhaps of more value to residents were the annual complaints performance and service improvement reports that have started appearing on most of the Trusts' websites to meet the requirements of the Housing Ombudsman's new Complaint Handling Code. The Panel couldn't locate HPLC report.

Each of these documents contained useful information on the actual number of complaints, brief description of the circumstances and eventual outcome. The RSP found that these short and snappy documents (whilst a requirement of the Ombudsman) provided useful and helpful information to residents but again these documents could be easier to find. We would recommend that these documents are more widely distributed in prominent positions at each of the schemes and residents receive a copy and are encouraged to comment on them at residents' meetings. These documents are effective signifiers of best practice and deserve to be better advertised.

We also felt that their visual element was a good way to communicate outcomes to residents. The RSP were particularly impressed with documents produced by Lench's,BCOP, SCHA, SJMT and YGT and these should be regarded as examples of good practice.

Complaints-Annual-Report-to-board-241025.docx
Complaints Report 2024 2025
YGT Complaints Report 2023 2024
BCOP-Complaints-Performance-and-Service-Improvement-Report-2024-2025.docx
https://www.lenchs-trust.co.uk/s/Annual-Complaints-performance-report-2024-25-final.docx

Website

This task and finish group reviewed each website and carried out a scoring matrix based on accessibility and transparency. Most websites fared well with the complaints policies visible but other information relating to complaints a little more difficult. If the websites all had search

options that may help but if you didn't know to look in the annual performance reports for information for example, it isn't helpful.

This group also researched other websites and found some best practice in terms of accessibility, transparency, style and language from the following: -

Yorkshire Housing - Home | Yorkshire Housing
Black Country Housing - Black Country Housing Group | Black Country Housing Group

We noted that SJMT and YGT need to review their wording on the websites in relation to

informal complaints that the Ombudsman frowns upon:

How to resolve your concerns or problems informally

Where possible, we encourage you to raise concerns directly with the staff members involved in the service you or someone you represent is accessing. They will aim to resolve this within 5 working days.

When a resident complains or expresses dissatisfaction with a landlord's service, there is a question as to whether they must always be logged as a complaint and responded to at stage one, even if the landlord is able to take immediate action to resolve the issue. This question was raised by many landlords when the code was first published in 2020 because it was silent on the issue, which suggested that expressions of dissatisfaction should always be taken through a landlord's 'formal' internal complaints process. Many landlords were concerned by this approach and pointed out that they routinely resolved a large number of minor issues quickly and to a resident's satisfaction, without engaging the formal complaints procedure. They argued that to require all such matters to be responded to at stage one would cause unnecessary administration for landlords and would disadvantage residents, who simply wanted the problem to be resolved quickly.

The code emphasises that: "The early and local resolution of issues between landlords and residents is key to effective complaint handling' (section 5.2) and the latest version (April 2024) also includes this helpful additional sentence: 'Whenever a resident expresses dissatisfaction landlords must give them the choice to make (a) complaint" (section 1.3).

So, landlords can try to resolve an issue early, without logging a formal complaint, on three conditions:

1. The complainant must agree to the early resolution; it must be their choice. If they insist on a formal complaint being logged and responded to, the landlord should do so
2. A record should be made of the decision to resolve the matter informally, so that there is an audit trail if the decision is disputed later on
3. The early or informal resolution should not form an extra initial 'stage' in the formal

complaints procedure. This is made clear in section 5.2 of the code: "It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion."

In practice, many landlords use some form of 'early resolution' process to successfully resolve many issues promptly. A variety of terms are used by landlords for this work, such as a 'service recovery process', 'escalation process', urgent enquiries' etc. While these may be useful internally, landlords should avoid using them more widely, as they may confuse residents and the Ombudsman.

Landlords need to be careful that any such processes do not become standard complaint 'stages' that are routinely followed without the resident's agreement. Any decision to attempt 'early resolution' should not be taken on a resident's behalf and, if early resolution is pursued, it should be done so swiftly and given priority. Overall, effective early resolution work should be welcomed, so long as the above conditions are met, as it is customer-focused and reduces unnecessary delays and administration.

Culture and Communication

This task and finish group spent time talking to the complaints leads at each of the partners and used a set of questions to guide their conversation to test how complaints were managed.

RSP Complaints Scrutiny – Template / Script and Questions for Complaints staff

1) How do you respond to a complaint being made? (when a resident contacts to report a complaint by phone, in person and on line, how/where do you begin. Talk us through the process and timescales).

(notes - staff should answer call giving their names and showing empathy, apologising, really listening and showing they care, giving confidence to customer, clear on timescales and what will happen next)

2) What details do you take down from a resident/? Does this differ depending on the method chosen to report the complaint? Do call handlers have a script they follow?

3) How do most complainants raise their dissatisfaction? (phone, in person or on line?)

4) Is it routinely asked how the situation has/ or is impacting the complainant?

5) What are the steps taken to resolve a complaint and do you make sure that the resident is aware of the steps/what they can expect?

6) Do you get back in touch with the residents regarding the complaint throughout their complaint? Is there any face to face contact? Do you communicate enough?

7) How long on average does it take to get back to the resident?

8) Do you ask the complainants what they are looking for in terms of a resolution?

9) What training do you have / is in place to equip staff who receive complaints, manage complaints and respond to complaints?

10) What would you like to change in the complaints service?

11) What are you proud of?

12) Is there anything else you would like to make the Scrutiny Panel aware of? Or is there anyone else you think we should meet with?

Many thanks for your time and honesty.

The Panel would recommend that the Complaints Lead should meet regularly with residents to explain any changes to their organisation's approach to complaints and ensure the scheme managers drive home the message that a resident does not need to formally say "I am complaining" to make a complaint and that clear expressions of dissatisfaction will be treated as a complaint and a complaint can be made to **any** member of the frontline staff, and makes it clear the responsibility lies with a named staff member and not the resident to progress any complaint, is placed in a prominent place in the policy documentation.

Section 3.2 of the updated code says: "Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord." This puts the emphasis on landlords to make sure that all staff – not just those directly involved in handling complaints – have the knowledge to correctly identify complaints and ensure they are registered and managed through the appropriate process. Landlords not properly differentiating between service requests and complaints can deny residents access to the formal complaints procedure and delay finding a resolution to the issues raised.

Again the RSP found that the chain of responsibility could usually be quite easily worked out and once this was established it was relatively easy to follow the progress of complaints through the system but the RSP feels that the person responsible for investigating and progressing the complaint should be explicitly stated and agreed with the complainant as

rapidly as possible as the complaint is being progressed.

The Panel were satisfied that the complaint outcomes were usually communicated to residents in a timely and effective fashion.

The panel felt that a regular scheduled opportunity for residents to meet with on site management to discuss complaints is essential. It was felt by the RSP that setting up "*a have your say*" forum that invites residents to share views would be helpful. Some of the Trusts already schedule these meetings, SCHA for example have a regular residents meeting where complaints and the work of the scrutiny panel are standing items on the agenda. It is unclear if these happen universally across all of the partners. Another example of good practice is Lench's Trust monthly resident's meetings with the site manager and the introduction of the quarterly senior management meetings where the CEO and the senior management team meet with residents to share information, discuss plans and most importantly address complaints has proven to be very popular with the residents and should be considered to be an example of best practice and we would urge other partners to consider introducing something similar if not already in place. Residents take comfort in having the CEO visible and we know that this is the case in most Trust's, Steven Simpson was washing up at one of the HPLC meetings!

The RSP would also recommend that it is made clearer to residents that a complaint has been recognised and is being investigated formally. The RSP has been informed by more than one residents that although the resident had thought they had made a complaint, in fact their complaint was being treated as a service request or an informal complaint and has not been logged as a formal complaint by the housing provider with the result that problems were left unresolved for far too long. We agreed in conversation with the Panel members that this seems to signify a willingness to resolve, rather than a reluctance to log but complaints should be viewed as positive insight.

In fact, the some of the RSP members felt at times the providers often adopted a defensive attitude and tried to persuade a resident that their problem was perhaps of lesser urgency/importance than it deserved and could be considered as informal. This raised concerns that all expressions of dissatisfaction are not routinely logged. Making sure formal complaints are logged accurately ensures transparency and promotes accountability and encourages positive resident engagement.

The RSP believe that open communication is key. Maintaining clear and consistent communication is one of the most effective ways to reduce complaints, keep residents informed about property policies, updates, upcoming repairs, or changes in rent terms etc. Providing multiple ways for tenants to contact you and responding promptly to their concerns builds trust and encourages a positive landlord-tenant relationship.

Culture and Communication

The RSP is convinced that good staff training is essential for successful complaint handling and embedding a positive complaints culture. It is clear that training is a key part of each of the Trusts' culture and it is visible on each website that effective staff development is important.

It was hard for the RSP to determine how effective the training had been and we would like to recommend refresher training as a result of our scrutiny project using real life case studies, focusing on empathy and building trust and confidence and leading to a positive, friendly culture.

The culture and communication task and finish group asked to look at the complaint responses to residents but given the low volume, this didn't happen. The Panel did look at some letter templates from SCHA and SJMT which the RSP would recommend all the partners develop to ensure compliance with the Housing Ombudsman but also a consistent tone of voice, style and straightforward language.

As mentioned above, we found that some of our vulnerable residents found these formal letters to be a bit "wordy" and unnecessarily complicated language were perceived to be hard to follow.

The Panel would like to urge the Complaints lead from each Trust to make sure any changes made to their culture and communication satisfy the following:

- increase residents understanding of the complaints process and give reasonable expectation of timeframes involved for resolution and explain how complaints can be resolved

- Ensure residents know who to approach to make a complaint and do residents know who their contact is

- make the process of making a complaint simpler and easier for our residents to use

- minimise any actual or perceived stigma surrounding the making of a complaint taking into account and of the protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation)
- Improve transparency, visibility and accessibility of the complaints process
- encourage resident's engagement with the complaints procedure

- Foster a culture where a complaint is welcomed and is treated as a learning opportunity
- Promote continuous staff training and career development so that the importance of

the complaints/resolution procedure is highlighted.

- Develop a culture where complaint resolution is seen as a key part of the way of driving improvements in service provision

Learning from Complaints

The Panel understand that one of the most important parts of the complaints process is the learning that comes out of them. The RSP were pleased to see how each organisation shared their learning from complaints although the recommendation was unanimously to make the learning more visible on the websites and in newsletters.

SCHA shared theirs in the annual complaints performance report and listed the following actions:

· Participate in multi-organisational Resident Scrutiny Panel activities when feasible.

· Review Housing Ombudsman publications and updates to inform policy changes.

· Share any learning with staff and residents via noticeboards or newsletters.

BCOP committed to the following learning in their annual report too:

Following the publication of our 2023/2024 report, and using the lessons we had learned during that year, we made the following changes during 2024 - 2025:

We undertook a complete review of our Complaints, Comments and

Compliments Policy and shared this with staff

We started training our staff teams on complaint handling, initially

focussing on the housing team.

We developed a new 'easy read' complaint process for our residents

(and their families) and put this on our website and noticeboards

We added online and downloadable complaint forms to our website

We implemented new software which will (one fully configured) better support complaint handling and monitoring.

Continuous Improvement and Resident Feedback

Actions:

· Share "You Said, We Did" updates with residents in simple formats.

The RSP really like the simple you said we did approach and would encourage more of this across the partners.

Lench's shared again eye catching visuals in their annual report sharing learning, we consider this best practice.

Learning from complaints- 'You said, we did'



The RSP would like to see a five-step process being considered as a new way of responding positively to complaints that effectively place emphasis on empathy, taking responsibility, and actually promotes quick and lasting resolution:

1. Listen and empathise with the resident to understand their concerns
2. Apologise and take responsibility for the issue
3. Offer a solution that works for the resident, to address the problem (personalise)
4. Follow up with the resident to ensure the problem has been resolved
5. Ensure the organisation has learnt from the complaint to make sure it does not happen again, to improve future service delivery.



Performance and Benchmarking

We used the benchmarking information helpfully shared on Lench's, YGT and SJMT's websites.

We really liked the visuals used at Lench's website:



TSM	Lench's 2023	SJMT	YGT	BCOP	SCHA 2023	HPLC	Comparison with all small providers
TP09- Satisfaction with the landlord's approach to handling complaints	56%	N/A	N/A	21%	36%	100%	58%

It is worth noting that the results of smaller providers are often much higher than that of larger social housing providers as a whole, particularly those providing housing to older people, who often score some 15-20 points higher. The Panel were pleased to note this. Satisfaction with social housing providers has been declining in recent years, at a time when satisfaction remains very high with some of our partners.

The performance task and finish group welcomed the TSM performance information on each website but those that helpfully shared how this compared fared better.

This group liked the SCHA "what people are saying" page on the website and suggest that this may be extended to complaints, the Panel felt that this was good practice and lovely use of case studies and quotes.

What People Are Saying - Solihull Care Housing Association Ltd

Customer Experience

Survey results

As we weren't able to talk to any previous complainants, we developed a survey that was distributed to all residents from each organisation. We had a total of 35 responses to the following questions: -

Resident Scrutiny Panel – Residents survey

Hello there, I am part of the Residents Scrutiny Panel and you may have read that we are looking at complaints for our first scrutiny project. We really want to help make things better for residents and to help our project, we would really love to hear from you on your thoughts about complaints.

We have some questions for you and it should only take a few minutes of your time to complete but that it's really important that your voices help to make improvements to the complaints service and really influence change.

If you would like to add more information, please do so on the back of this sheet.

Please hand your completed survey back to your scheme Manager or to a member of the Resident Scrutiny Panel in your scheme. You don't have to share your personal details, but if you would like a response to the survey, please add your name, address and contact details at the bottom of the survey.

Thank you very much.

The Resident Scrutiny Panel

1) Would you know how to make a formal complaint to your landlord? (please circle)

   YES/NO

2) If YES, how would you complain? (in person, over the phone, via the website, email etc)

   ……..

3) Did you know that there is lots of information about complaints on the website?

YES/NO

4) Have you ever had to make a formal complaint?

   YES/NO

5) If so, please can you tell us a little bit more about what you liked and disliked about the process?
   (think about how easy was it to complain? Did you feel really listened to? Did anyone come out to see you? Did you feel trust and confidence with your landlord resolving your complaint?)

   ……

   ……

   ……

   ……..

6) Is there anything you would improve? (Please state)

   ……..

7) Is there anything else you would like to share with the Panel?

   ……..

   ……

   ……

   ……..

Thank you so much for your time, it is really appreciated. Look out for our report on the website in a few weeks' time.

Name:…….

Address:…….

Tel:.....

Email:…….

The results are below:

Resident Scrutiny Panel – Residents survey

The responses to the Resident Survey, although relatively low, have confirmed some of the Scrutiny panel findings.

The response to questions 1 & 2:

A significant number of respondents are not aware of a complaints process or that there is information on the websites. It is also apparent that more than half residents who responded prefer to deal face to face with a member of staff, however there is still a significant number who will use technology or phone.

The response to questions 3 & 4:

Just over half of the respondents are aware that information is available on the websites and only 3 of them have complained.

The Responses to questions 5,6 & 7:

There is a theme of communication and accessibility to information in multiple formats. My general impression is that this seems to be an emotive issue for residents and can be frustrating thus potentially preventing them from raising an issue that could have been resolved.

General Impression:

Communication and feedback concerning both, how to complain and how a complaint is progressing once it has been raised. These are extremely important and valuable in terms of reducing anxiety and solving the problem

The RSP would like to recommend that each organisation represented reflects on the survey findings and takes appropriate action.

Conversations with Residents on the Panel

Scrutiny Panel members shared their concerns in relation to complaints from their experiences and from insight gathered from their locality.

Some of the Panel had first-hand experience of raising a formal complaint and how it wasn't always a positive experience. We would recommend that customer satisfaction is shared more widely in addition to learning from complaints.

Recommendations

The Panel have created a table (appendix 1) to clearly set out their recommendations captured during this scrutiny project and look forward to hearing the response from each partner.

Next steps

The Panel would like to thank all the residents involved with this project and all the staff supporting the RSP, their hard work and generosity with their time is much appreciated. The Panel have really enjoyed contributing to this important work and it has really been really inspirational showcasing our combined skills and experience. Some of the Panel had this to say: -

"I learned a lot and hopefully some changes may come out of it."

"I was involved in communication and I presented so I utilised skills"

"I enjoyed meeting everyone and Emma was brilliant"

"It was great to be a part of this panel. I learned so much about the process and was grateful for the guidance and direction of Emma, and the skills and expertise of the group as a whole".

"I also realised that even though we are retired we can still have a part to play and skills we can utilise to bring about change".

"We ain't going out to pasture just yet Lol"

We would welcome the opportunity to present our report and recommendations to the individual Board of Trustee's December 2025 onwards.