

## **Annual Complaints Performance and Service Improvement review 2024**

### **Purpose**

This report gives an update on the progress made in our management of complaints and our self-assessment against the Housing Ombudsman (HO) Complaint Handling Code which came into force on 1 April 2024. Under the new Code, which has a statutory basis, we are required to publish:

1. Our self-assessment.
2. Analysis of the landlord's complaint handling performance.
3. Any findings of non-compliance with this Code by the HO.
4. Service improvements made as a result of the learning from complaints.
5. The Group Board's response to the annual complaints performance and service improvement report.

### **Background**

The number of formal complaints we receive and manage continued to increase in the past year. This is a sector-wide trend related to a number of factors, including changing trends in customer expectations identified by the National Institute for Customer Service and the role of the HO in ensuring customers are aware of their rights to redress.

However, it is important to acknowledge that the majority of formal complaints at Rooftop are upheld and reflect service failures.

The review of the complaints process in Autumn 2023 by the Internal Audit service also found several issues remaining and some highly important recommendations outstanding, including:

1. Ensuring our methodology is consistently applied.
2. Ensuring that evidence is methodically recorded, especially with regard to communications with the customer and timeliness of responses.

In April 2024, Rooftop's Audit and Risk Committee received a report that outlined the significant progress made against these recommendations.

### **Self-assessment against the Complaint Handling Code**

The HO requires that every housing association completes a self-assessment against the Code each year. Our self-assessment against the updated 2024 Code has been published on our website and submitted to the HO.

### **Analysis of complaint handling performance**

Our handling of complaints has not been fully compliant due to an inconsistent approach across the business. Putting in place a centralised team has begun to provide evidence that we are addressing previous weakness, including the management of complaints within our housing management system, customer communications, maintaining evidence and keeping to processing timescales.

Our Tenant Satisfaction Measure (TSM) for our approach to handling complaints was 42.3% for the year, against an indicative peer benchmark of 31%. Although our volume of complaints at both Stages 1 and 2 appears high at 37/1,000 and 7.2/1,000, full-year comparison data is not yet available.

Overall timescale compliance for Stage 1 for the year was 37.4% but for complaints closed in March had improved to 55%. This is largely due to focused work to clear the backlog of complaints prior to the introduction of a centralised team. Stage 2 timescale compliance was 53.1%. Both scores were well below the peer comparisons.

Since the new centralised team and associated processes went live on 18 March 2024, 100% of all subsequent Stage 1 cases have been timescale complaint and an increasing number of Stage 2 cases have met timescales as we work through complaints which pre-date the new system.

During 2023-24 there were a total of 236 new Stage 1 cases, almost 100 more than we received in 2022-23 (137 altogether). This represents a 72% increase. Over the past 12 months, 45 Stage 1 complaints escalated to Stage 2, just over double that of 2022/23 (45 versus 21). Below is a summary of the dissatisfaction and complaints volumes in 2023/24:

<b>2023 – 24 Full Year</b>	<b>Total</b>	<b>Service Requests</b>	<b>No at Stage 1</b>	<b>No at Stage 2</b>	<b>Housing Ombudsman</b>
<b>Repairs</b>	<b>806</b>	663	121	22	0
<b>Housing</b>	<b>274</b>	218	49	6	1
<b>Programmed Works</b>	<b>105</b>	79	18	6	2
<b>Rent &amp; Service Charges</b>	<b>76</b>	53	20	3	0
<b>Other</b>	<b>139</b>	103	28	8	0
<b>Total</b>	<b>1,400</b>	<b>1,116</b>	<b>236</b>	<b>45</b>	<b>3</b>
<b>Proportion</b>		<b>79.7%</b>	<b>16.9%</b>	<b>3.2%</b>	<b>0.2%</b>

Although the overall number of service requests recorded has not significantly changed year on year, the number that has been recognised as a formal complaint at Stage 1 and Stage 2 has nearly doubled and this trend is broadly uniform across the various categories.

### **Findings of non-compliance with this Code by the HO**

Within the financial year, the HO determined severe maladministration in two Rooftop complaint cases:

1. The first case determined in November 2023 related to our response to reports of a broken window, a seized hot water tap, kitchen repairs/condition, a broken/unsuitable communal entrance door, communal cleaning and maintenance, antisocial behaviour (ASB), fire safety concerns and complaint handling.
2. The second case determined in January 2024 related to the handling of energy efficiency works to the property, our response to the customers' reports of damp and mould and complaint handling.

Action Plans were put into place and, with the exception of one action which requires and relates to additional/future staffing, both have been completed. These two determinations were a major catalyst for change and resulted in the establishment of a dedicated central team and significant changes to our Policy and procedures.

Rooftop reviews following the findings by the HO identified a number of learning themes and specific areas for improvement. These were addressed in the detailed Action Plans but are summarised across the two cases below:

- Customer communication
- Clarity of responsibility for aspects of building maintenance/safety
- Delays and ineffective responses
- Following policy and procedure
- Responding to evolving and multiple complaints
- Defining the complaint
- Putting things right
- Tone and approach
- Contractor failure.

### **Service improvements made as a result of the learning from complaints**

From 18 March, a new centralised Complaints Team was launched by redirecting existing resources elsewhere in the business, but particularly from the Repairs Call Handling Team. This new Team sits within Customer Experience and equates to 3.5 full time equivalents, led by the Customer Experience Manager. The focus of the Team is to improve the customer experience through better administration of the resolution process at all levels (service request, formal complaints and HO investigations).

Responsibility for investigating and agreeing resolutions with our customers remains with operational team members. Ensuring that complaints are resolved as early in the process as possible and within the proscribed timescales will bring efficiencies to this area of the business. Key areas of focus for our Complaints Team going forward include:

- Embedding our new approach to learning from complaints.
- Review of our Compensation Policy.
- Development of reporting on early resolutions.
- Review of all complaints letters for tone of voice alignment.
- Equality, Diversity and Inclusion analysis of 2023/24 data for trends and exceptions.

Below are some specific examples of where we have listened to our customers over recent months and taken action to improve our services.

<i>You Said</i>	<i>We did</i>
We didn't give you clear or consistent guidance / advice in some areas	We have created a 'Rights and Responsibilities' check list for colleagues and customers. This clearly sets out areas and items in the home and clarifies whether the responsibility for repairs is the customer's or Rooftop's. This is now live on our website at this page: <a href="https://www.rooftopgroup.org/Repairs%20In%20Your%20Home%20-%20Who%20is%20Responsible?">Repairs In Your Home - Who is Responsible? (rooftopgroup.org)</a> .

<p>The wording of some of our letters makes them hard to understand</p>	<p>We are publishing a Tone of Voice document to guide colleagues in their communication. This encourages us to be more caring, inclusive, responsive, and respectful. Alongside this, we will be reviewing all our core letters and communications to simplify the language and content. We will also be sharing a 'dictionary of housing' with colleagues and customers, to help explain some of the necessary terminology, and common abbreviations and acronyms.</p>
<p>We don't communicate often enough, especially on complex issues and complaints</p>	<p>We are investing in further customer-focused training for all our operational teams under a programme called 'We Care'. The training will include a focus on the ownership of issues raised by customers and the need to be responsive. This reflects the key traits in our Tone of Voice. E-learning courses have now been rolled out to all colleagues on the 'We Care' Customer Service programme.</p>
<p>We don't always listen to your views or engage with you</p>	<p>The Tenant Participation Advisory Service (TPAS) held a series of workshops from December 2023 to February 2024 to ask our customers for their views on how we currently engage with them, and what we might do to improve. These workshops also involved colleagues and Board Members. TPAS presented its final report and recommendations for a Customer Engagement Framework to the Executive Team in February and to the Board in March. TPAS is delivering a final presentation to the Customer Scrutiny Panel in May to share our work on customer engagement with them.</p>

### New Learning Framework

The Customer Experience Manager maintains a central shared log wherein the learning outcomes from complaints since 18 March are documented. Learning from complaints is still evolving and requires an integrated ICT solution to better support the identification of trends to drive improvement. The Learning Outcomes focus on key areas:

1. Colleagues – identify which colleagues require training, support and performance management. The applicable Head of Service is responsible and accountable for identifying and executing requisite actions.
2. Policies/Procedures/Processes – identify which policies/procedures/processes contributed, and in which way, to the issues raised in the complaint. This includes understanding of how they may have created barriers to resolving the complaint. The Head of Service is responsible/accountable for identifying and executing requisite actions.
3. Communication – identify which individuals, which teams, which Head of Service and which Executive Director is impacted by any lessons learned in points 1 and 2 above; communicate findings to those impacted. The Head of Service is responsible/accountable for identifying and executing requisite actions.
4. Communication – once the Head of Service has completed the Learning Log and executed the actions required, this will be reported to the wider business by the Complaints Team.

A full process review (Complaints Procedure) has also now been completed by the ICT team.