

REPORT TITLE: ANNUAL COMPLAINTS PERFORMANCE AND SERVICE IMPROVEMENT REPORT AND SELF-ASSESSMENT 2024/25 (AGAINST THE HOUSING OMBUDSMAN'S COMPLAINTS HANDLING CODE) AND UPDATED COMPLAINTS HANDLING AND REDRESS POLICIES

Meeting(s)	Cabinet
Date(s)	10 June 2025
Cabinet Member	Cllr Moses Crook Deputy Leader and Transport and Housing
Key Decision Eligible for Call In	Yes Yes
<p>Purpose of Report To provide Cabinet with the mandatory Annual Complaints Performance and Service Improvement report for 2024/25 including the Council's self-assessment set against the Housing Ombudsman Complaint Handling Code for approval prior to submission to the Housing Ombudsman by 30th June 2025.</p> <p>To seek Cabinet approval of an updated Complaints Handling Policy and Redress Policy.</p>	
<p>Recommendations Cabinet is asked to:</p> <ul style="list-style-type: none"> • Approve the Annual Complaints Performance and Service Improvement Report 2024/25, which includes the self-assessment against the Code, as set out in Appendices 1 and 2. • Provide its response to the Annual Complaints Performance and Service Improvement Report 2024/25 and Annual Self-Assessment, along with any changes to either document which will then be submitted to the Ombudsman. Cabinet's response is a mandatory requirement. • Delegate the Service Director – Homes and Neighbourhood to publish the final report including Cabinet's response and the self-assessment, on the Council's website, post submission. • Approve the updated Complaints Handling Policy and Redress Policy. 	
<p>Reasons for Recommendations</p> <ul style="list-style-type: none"> • To meet the requirements of the Housing Ombudsman's Complaint Handling Code ('Code') which is statutory under the Social Housing (Regulation) Act 2023. 	
<p>Resource Implications: There are no significant resources implications associated with the production of the annual performance report and self-assessment which are currently funded via existing budgets in the Housing Revenue Account.</p>	
Date signed off by <u>Executive Director</u> & name	David Shepherd 23/04/2025
Is it also signed off by the Service Director for Finance?	Kevin Mulvaney 15/05/2025

Is it also signed off by the Service Director for Legal Governance and Commissioning (Monitoring Officer)?

Samantha Lawton
20/05/2025

Electoral wards affected: All
Ward councillors consulted: None
Public or private: Public
Has GDPR been considered? Yes

1. Executive summary

The Social Housing (Regulation) Act 2023 introduced major changes in how social housing landlords are held accountable. Under this new framework, local authority landlords like us are now subject to stronger oversight by both the Housing Ombudsman and the Regulator of Social Housing.

As part of these reforms, we are required to publish an Annual Complaints Performance and Service Improvement Report by 30 June 2025. This report shows how we are performing in handling complaints, how we are learning from them, and what we are doing to improve our services.

This report also works alongside the Tenant Satisfaction Measures (TSMs), giving a full picture of how we are listening to residents, resolving concerns, and improving the quality of our services.

We have clear and specific duties in relation to both the Housing Ombudsman and the Regulator of Social Housing:

- The Housing Ombudsman is responsible for ensuring that residents of social landlords have access to fair, effective complaint resolution. We must comply with the Housing Ombudsman's Complaint Handling Code, which sets out best practice for dealing with complaints quickly, fairly, and openly.
- The Regulator of Social Housing monitors how well landlords like us deliver core tenant services. They assess how effectively we respond to complaints, how we listen to residents, and how we take action based on feedback.

Together, these bodies hold us to account — and we are committed to meeting their expectations by being open, learning from complaints, and continuously improving.

2. What this report covers

The 2024/25 report includes:

- A review of how well we comply with the Complaint Handling Code.
- Our complaint volumes and performance data.
- Themes and reasons for complaints and escalations.
- Learning from the Housing Ombudsman's findings.
- The steps we have taken to improve, and what we are planning to do next.

Our complaints performance this year

This year, we handled 772 Stage 1 complaints, a drop of 54 from last year. Of these, 64.34% were upheld, meaning we accepted that things went wrong and took steps to put them right. We responded to 82.71% of Stage 1 complaints within 10 working days, an improvement from 74.33% in 2023/24.

While we are encouraged by this progress, a third of all Stage 1 complaints (250 cases) escalated to Stage 2. This is an 18% increase from last year and shows that many residents still do not feel their concerns are resolved early enough.

At Stage 2, we responded to 68.18% of complaints within the target of 20 working days, down from 75.26% last year. We know this is not good enough and we need to do more to resolve complaints earlier and respond quicker at both stages.

Housing Ombudsman findings

The Housing Ombudsman made 21 decisions about complaints relating to our service this year, covering a total of 49 determinations. Of those, 65% included findings of maladministration — meaning the Ombudsman found we did not handle things properly.

This is a reduction from last year's 75% maladministration rate, but we know we need to go further. The sector average for local authority and ALMO landlords is currently 78%, so we are slightly below average — but still not where we want to be.

We fully accept the importance of learning from these findings and taking concrete action to avoid repeat failings.

Improved data and better understanding

This year, for the first time, we have had more detailed and structured data about complaints. This includes the specific reasons for resident dissatisfaction and why complaints escalate. Previously, broad categories like “poor communication” were used. Now we record the exact service areas involved — such as repairs, damp and mould, or antisocial behaviour. This clarity allows us to act more precisely and effectively. These insights, combined with learning from Housing Ombudsman determinations, have already informed a wide range of service improvements.

Service improvements to date

We have taken several important steps to address complaint themes and improve how we deliver services:

Complaint Handling Training: Over 400 staff members have completed complaint handling training, helping them respond more effectively, fairly, and within timescales.

Antisocial Behaviour (ASB):

- We launched a new ASB policy, with clear guidance for consistent case management.
- All housing management staff were trained on the new procedures.
- We introduced ASB audits to check that the policy is embedded in day-to-day casework.

New Housing Management System:

- We are preparing to roll out a new digital system later this year to improve how we record and manage resident issues, including complaints, ASB, and repairs.
- The system will support our Vulnerable Tenant Policy by helping us collect and review information so we can better support residents who need additional help.

Repairs and Property Investment:

- We have started redesigning our repairs process, including developing a new repairs IT system.
- Stock condition surveys will begin later this year, helping us plan smarter investment in homes that need it most.

Damp, Mould and Condensation (DMC):

- We have improved the way we respond to DMC issues, added treatment capacity, and built in vulnerability assessments.
- We have also set up a dedicated team to support residents experiencing repeat or complex DMC problems.

Compliments and Resident Satisfaction

While complaints help us learn, we also recognise and value positive feedback. This year we received 125 compliments — a 30.4% increase from last year — showing that many residents do appreciate the service they receive.

However, our Tenant Satisfaction Measures (TSMs) show that only 42.2% of residents are satisfied with how we handle complaints. This is a key area we are committed to improving. We want residents to have confidence that when things go wrong, we will listen and put things right.

Looking Ahead: What We Are Working On

We are continuing our improvement journey by:

- **Updating our Complaints Policy** to make it clearer, more accessible, and easier for residents to use.
- **Revising our Redress Policy** to ensure residents understand how and when we will offer compensation, apologies, or service improvements.
- **Launching our new Housing Management System**, which will improve how we manage complaints and consider resident vulnerability.
- **Rolling out our patch-based housing management model**, giving residents more direct access to housing staff in their neighbourhoods.
- **Beginning a 3-year programme of stock condition surveys** to help us target investment and improve homes where it's needed most.
- **Delivering the Tenant Voice Strategy** to ensure that tenants have a say in how we develop and deliver services to ensure the best outcomes
- **Embedding culture change** through the introduction of 'Our Council'

Conclusion

We understand the importance of complaints — they are not just problems to fix but opportunities to learn, improve, and build trust.

We have made some important progress this year:

- Improved complaint handling at Stage 1.
- More accurate data and insights into resident dissatisfaction.
- Stronger training and clearer policies, especially around ASB and repairs.
- Early implementation of service changes based on Ombudsman and tenant feedback.

We recognise that there is still more work to do and remain fully committed to:

- Complying with the Complaint Handling Code.
- Engaging transparently with the Housing Ombudsman and the Regulator of Social Housing.
- Listening to our residents and using their feedback to shape a better, more responsive housing service.

3. Implications for the Council

3.1 Council Plan

3.1.1 As set out in the Council Plan, as a social landlord, the Council is '...striving to transform council services to become more modern, efficient and effective'. Of specific relevance to council housing under Priority 2, is '...the work to deliver transformation of services and homes for our housing tenants' which includes:

3.1.2 *Ensuring the tenant's experience (customer journey) informs the development and delivery of housing services throughout 2024-25 and ongoing* (relates to performance updates under Safety and Quality Standard (including Fire Safety and Damp, Mould and Condensation), Transparency, Influence and Accountability Standard (including Complaints Handling), Neighbourhood and Community Standard (including Anti-Social Behaviour) and, Tenancy Standard (including Income Management).

3.1.3 We are committed to delivering the principles within 'My Council' which is essential to improving service delivery and outcomes for tenants. This fundamentally includes:

- Tenants having access to reliable and high-quality services.
- All employees understand how the work they do contributes to tenant experience and outcomes.
- Performance and contract management practices are embedded to ensure efficiency and quality.
- Tenants understand what to expect from the Council as set out in the tenancy conditions.
- Tenant involvement is representative of our communities and ensures that services are designed based on lived experience.
- Feedback is proactively sought on a regular basis and consistent communications ensure tenants understand how it is used to shape service improvements.
- Staff are visible and accessible to our tenants.

3.2 Financial Implications

3.2.1 Dissatisfied tenants are more likely to want to complain which has a direct impact on capacity and resources at a time of budget constraints. Complaints Handling is administered by the Customer Experience Team, comprising 5 FTE staff budgeted at £210,623 in 2024/25. Based upon the 1022 stage 1 and stage 2 complaints received in 2024/25, it costs on average £200 to administer each complaint received.

3.2.2 The Complaints Handling and Redress Policies will provide a more robust, consistent and transparent framework when considering redress and ensures that any compensation is fair, appropriate to the situation and protects council resources. In 2024/25 the budget was £20,000 and expenditure for the year was £54,852. The increased spend reflects the higher number of payments made and the level of compensation paid which is more in line with awards made by the Housing Ombudsman to improve our compliance against the code. In addition, the budget also now covers compensation payments that were previously paid from other budget headings e.g. rent refund, right to repair to ensure that all complaint resolution payments are visible in one budget.

3.3 Legal Implications

3.3.1 The Social Housing Regulation Act (2023) expanded the powers available to the Regulator for Social Housing (RSH). These now include the ability, upon the RSH determining a social housing provider is failing to meet its standards, to require a social housing provider to submit

a performance improvement plan; take emergency remedial action; issue penalties or pay compensation. The RSH's standards include Consumer Standards.

3.3.2 The Housing Ombudsman's Complaint Handling Code became statutory on 1 April 2024 meaning that social housing landlords are required to follow the requirements set out in the code. The Social Housing Regulation Act (2023) places a duty on the Housing Ombudsman to monitor compliance with its Complaint Handling Code. The Housing Ombudsman has the power to make a social housing landlord apologise, carry out works or pay financial compensation

3.3.3 If complaint handling is poor and/or there are low levels of tenant satisfaction this could indicate that a social landlord may not be compliant with the RHS's Consumer Standards and/or the Housing Ombudsman Complaints Handling Code.

3.3.4 It is therefore important the Council continues to ensure it is managing complaints in accordance with legal and regulatory frameworks to avoid enforcement action.

3.4 Climate Change and Air Quality

Not applicable.

3.5 Other (e.g., Risk, Integrated Impact Assessment or Human Resources)

3.5.1 An Integrated Impact Assessment (IIA) was undertaken to reflect the requirements contained within the revised joint handling code - [IIA-576688161](#). There were no actions confirmed but further assessments may be required as the approach to complaints handling continues to develop and improve.

4. Consultation

4.1 Under the Social Housing (Regulation) Act 2023, the Housing Ombudsman's Complaint Handling Code ('Code') is statutory, and the Council is required to produce an annual complaint performance and service improvement report including a self-assessment.

4.2 Landlords must ensure that this has been reported to Cabinet and published on the section of the website relating to complaints. When publishing the self-assessment as part of the annual report, the council must include Cabinet's response to the report to provide assurance that the self-assessment is a true reflection of the council's complaint handling. The response should set out how the Member Responsible for Complaints (MRC), Portfolio Holder, Transport and Housing, has scrutinised and challenged the self-assessment and how any risks identified as part of the review have been addressed. The Annual Report was presented to the Portfolio Holder on 29 April 2025.

5. Engagement

5.1 The Homes and Neighbourhoods Improvement Board (HNIB) was briefed on the Annual Complaints Performance and Service Improvement Report on 13 May 2025. The Council's Tenant-Led Panel (TLP) were briefed at the Panel's meeting on 28 May 2025 who commented that it was a fair and honest assessment of complaints handling and recognition from the Council that improvements still need to be made. In addition, the TLP receive quarterly performance reports on complaints handling throughout the year.

6. Options

6.1 No other options have been considered in the development of this report.

Options considered

6.2 Not applicable.

Reasons for recommended option

6.3 Not applicable.

7. Next steps and timelines

7.1 Cabinet is asked to:

7.1.1 Consider the draft Annual Complaints Performance and Service Improvement Report 2024/25, which includes the self-assessment against the Code, as set out in Appendices 1 and 2.

7.1.2 Provide its response to the Annual Complaints Performance and Service Improvement Report 2024/25 and Annual Self-Assessment, along with any changes to either document which will then be re-submitted to the Ombudsman. Cabinet's response is a mandatory requirement.

7.1.3 Authorise the Service Director – Homes and Neighbourhood to publish the final report including Cabinet's response and the self-assessment, on the Council's website, post submission.

7.1.4 Approve the updated Complaints Handling Policy and Redress Policy

8. Contact officers

Erran Taylor, Head of Governance and Improvement
Tel: 01484 221000 ext 73281
Email: erran.taylor@kirklees.gov.uk

Emma Teal, Housing Services Manager
Tel: 01484 221000 ext 73571
Email: emma.teal@kirklees.gov.uk

Robert Scott, Partnerships Strategic Manager
Tel: 01484 221000 ext 73543
Email: robert.scott@kirklees.gov.uk

9. Background Papers and History of Decisions

9.1 None.

10. Appendices

10.1 Appendix 1: Annual Complaints Performance and Service Improvement Report 2024/25.

10.2 Appendix 2: Housing Ombudsman Complaint Handling Code Self-Assessment.

10.3 Appendix 3: Housing Ombudsman Landlord Report (2023-2024).

10.4 Appendix 4: Complaints Handling Policy.

10.5 Appendix 5: Redress Policy.

- 11. Interim Service Director responsible**
Janet Sharpe for Homes and Neighbourhoods
Tel: 01484 221000 ext 78709
Email: janet.sharpe@kirklees.gov.uk