

Complaints Performance and Service Improvement Report

April 2024 – March 2025



“Improving
complaints is a
major priority
for Housing 21”

Elaine Elkington
Chair of the Board

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1. Forward

The Board welcomes this annual Complaints Performance and Service Improvement report. Residents' complaints are an important element of us actively listening to what our residents are telling us through their ongoing feedback. We interrogate those complaints as an opportunity to learn lessons, and ensure that, as an organisation, we act on this feedback by identifying key issues. Amending our approach, our services and our overall offer to ensure that we are providing great housing, care and support services for residents.

Acting on complaints is a requirement of the Regulator's Transparency, Influencing and Accountability Standard, requiring Boards to evidence learning from complaints to continuously improve services. We do it because it is the right thing to do for our tenants. We have a resident complaints panel which supports learning by reviewing complaint responses. It highlights any areas for improvement and discusses the resulting changes which should be made to policies or service standards. The panel also reviews Ombudsman reports, drawing out the important lessons learnt in the sector. The resident complaints panel is a crucial and influential group which we need to ensure remains representative of our resident base.

There is additional oversight from the Resident Board Member Responsible for Complaints, Richard Dell. This role has full support of the Board and Richard's input is valuable. His regular interaction with the operational complaints team enables further feedback to be sought, adding to the formal reporting around complaints. Richard's response to the report is below.

In future the range of information seen by the Board will increase in frequency. This will be an integral part of our response to achieving and maintaining a C1 Regulatory judgement. The Board is also committed to the National Housing Federation's "Chairs Challenge" to ensure we remain diverse in our thinking, are inclusive and take any actions required to fulfil our vision for the future.

I am determined that as an organisation, led by the Board that we deliver another year of service improvements, further strengthening our complaints' response times and processes which results in even better services for residents.

Elaine Elkington, Chair of the Board, Housing 21

I am very pleased to have a role in giving assurance on the effectiveness of our complaints processes, having joined the board in 2024 and been a tenant for over three years. Whilst we have had another year with a relatively low number of complaints, there is continued emphasis on improving the way we respond and ensuring that the organisation learns any lessons we can when things go wrong.

Maintaining a positive culture around making complaints is a priority for us and we have made some improvements in how we communicate at each stage of the process, including refreshing some of our literature. We are also making changes to how we record and analyse complaints so that we can better understand patterns or trends across our many sites. Above all else, we are embedding awareness of how to deal with complaints into the organisation at large, underpinned by our value of "doing the right thing" whenever we can.

Richard Dell – Member Responsible for Complaints

1. Introduction

Housing 21 is a leading not for profit provider of Retirement Living and Extra Care for older people of modest means. We operate in 215 local authority areas across England, managing over 24,000 Retirement Living and Extra Care properties and providing over 49,000 hours of social care each week. Residents are at the heart of everything we do and we aim to provide good quality accommodation and accompanying services in all of our schemes. We accept that things do sometimes go wrong and we actively encourage residents to tell us when that is the case. We also use the feedback we get from complaints to highlight areas for improvement and learn lessons. We aim to use complaints as a means to achieve a positive outcome for residents and a learning opportunity for us.

As a national landlord with over 650 schemes, our complaints are dealt with at a local level by our employees who know the residents, their needs and also the schemes. This enables us to thoroughly investigate a complaint, gathering relevant information, and providing a detailed and robust response.

Every complaint is an opportunity for Housing 21 to learn lessons and we capture these to implement improvements in our services. To maximise impact, these learning opportunities are categorised as either localised issues to be addressed at that level, or issues which impact national services, policies and procedures. Continual learning is helping us to create a positive complaint handling culture which we are working to embed with residents and employees.

This publication contains our complaints and compliments performance over the financial year 2024/25. As an organisation we have a relatively low number of complaints at 297 with an overall resident population of approximately 26,000. It also provides detail on how we have improved the complaints experience over the past year and the issues and aspects of complaints that have been areas of focus for 2025/26.

The work we are undertaking on complaint handling is having an impact as we have seen our Tenant Satisfaction Measure on how we handle complaints increasing from 48% in 2023 to 60% in 2024.

Complaints are an important aspect of the strategic priority of accountability as well as quality of properties, quality services and affordability.



2. Our focus on complaints during 2024/25

In recognising the importance of complaints both as the opportunity to make things right for residents but also as a way to improve our services, we have had several areas of focus during the past year:

2.1 A better complaints experience for residents

The quality of responses our residents receive is important to us and we strive to constantly improve it. We have upskilled our employees on how to effectively deal with complaints to provide a robust and well-written response to the resident whilst also providing good customer service.

Support and guidance

We operate a two-stage complaints policy but strive to ensure that the investigation and strength of response at Stage one resolves the complaint, potentially eliminating the need for the resident to move to Stage two. This approach has been reinforced through the bespoke training delivered to the Stage one complaint handlers.

We recognise that due to our devolved model and complaints being dealt with at a local level, some of our employees may not deal with complaints on a frequent basis, so we have put in place additional support and guidance to aid them through the process. This Stage one complaint handling training focuses on the ethos behind complaints, how to provide a quality response as well as reinforcing the CHC timescales.

Support on how to effectively use our complaints case handling system (Erica) has also been enacted with regular drop-in sessions.

Good data management in this system is essential to keep all parties informed and to enable us to accurately report on our performance.

Enhanced reporting

To enhance reporting, changes were made to Erica in June, including the ability to record residents vulnerabilities and resulting reasonable adjustments which were made. Although progress has been made, recording this information remains low with only 36 complaint cases recording a vulnerability.

Clear communication

Residents tell us how much they value ongoing communication after lodging a complaint. We've been trialing calling complainants before issuing the Stage one outcome letter to them which has been welcomed. It has provided an opportunity for a conversation about the investigation and outcome and residents have expressed greater satisfaction with this approach.



2.2 Widening resident involvement

A residents complaint panel has been in place for several years. We share anonymised complaints responses with the panel members and they provide useful feedback in terms of the overall response, its quality and tone as well as insights into alternative ways in which we may have handled the complaint.

The panel has been heavily involved in the co-production of the Complaints Handling Code (CHC) Self-Assessment, updating the Complaints Policy and the production of this report. They also review the resident-facing literature around complaints

2.3 A Board Member Responsible for Complaints

The Ombudsman Complaint Handling Code requires that we have a Member Responsible for Complaints (MRC). This role is to provide assurance to Housing 21's Board on the effectiveness of its complaints system including challenging the data and information provided to the Board.

The role holder is also responsible for ensuring that complaint handling drives service improvement for residents and learning and business improvement for the organisation.



2.4 The impact of the revised Complaint Handling Code (CHC)

The move away from an informal complaints stage under the revised CHC was a big change for how we dealt with complaints as the majority were resolved at that stage. Previously informal complaints outnumbered formal ones by nearly six to one between 2022 and 2024, so we have seen a noticeable increase in the number of formal complaints, reflecting the experience across the sector.

During the year we tasked Operational Managers to assess whether there are any barriers for residents wanting to make a complaint and to ensure that the process is understood by residents.

Communication of the complaints process

Local managers were asked if the complaints process is accessible and promoted to residents so that they are aware of how to complain and how they can escalate a complaint to the Housing Ombudsman Service.

This yielded the following results by scheme:



One percent were rated as outstanding



94 percent rated as good



Four percent as requires improvement

This work has highlighted the need to make information about complaints more visible in some of our schemes.

Handling of the complaints process

When asked whether the complaints process is handled fairly, 87 percent of schemes self-reported a 'good' rating. It is worth noting that some of these schemes have not had to navigate the complaints procedure during 2024/25, but expressed confidence in their ability to do so effectively if required. In contrast, the majority of schemes that rated themselves as 'requires improvement' or 'inadequate' also had not recently managed a complaint and reported a lack of confidence in their knowledge of the process. Schemes that have been through the complaints process during the period have identified specific areas where they can make improvements.



3. Learning lessons

3.1 Monthly Reporting

A monthly 'satisfaction with Stage one repairs' survey is undertaken. Although the number of respondents is small (typically 10-20 residents) the real value comes from qualitative feedback and comments in particular. The following satisfaction levels are from quarter three, due to the timelag.



60 percent were satisfied that we kept in touch throughout



58 percent were satisfied with the quality of the response letter

Residents provide free text as part of the survey and this qualitative data gives insights into their experience and thoughts.

Themes from comments show that residents feel that Housing 21's complaints process should be quicker and we should ensure there are improvements in the interactions between scheme managers and residents wishing to make a complaint.

3.2 Ombudsman Spotlight Reports

The Spotlight reports which are published by the Housing Ombudsman Service (HOS) provide an ideal opportunity for us to learn lessons from across the sector and ensure they are implemented in the context of Housing 21. Some examples are shown opposite.

Knowledge and Information Management



Developed a repairs dashboard to make data more accessible for employees, giving them the ability to drill down to identify potential problems before they become complaints as well as being able to assess value for money and compliance issues



Started a project to adopt the UK Data Standards and good practice on all our data sets



Developed Data and Digital training to equip employees with the knowledge and confidence to use data effectively

Attitudes, Respects and Rights



Working on the provision of Wi-Fi and supporting employees have the confidence and ability to embrace this and help residents struggling with the digital divide, which is especially apparent amongst some groups of older people



Specialist roles have been created to deal with the increasingly complex needs we are seeing amongst our residents



Making reasonable adjustments and adaptations an integral part of our service offering

Damp and Mould



A damp and mould policy has been developed which is under review in readiness for compliance with Awaab's Law



A 'hazards' module for our housing system is being explored to ensure accuracy of recording and reporting



Training is currently being developed for frontline staff to recognise damp, mould and condensation, be able to assess the severity of it and identify the appropriate course of action to take



Awareness raising is taking place with all residents and employees on damp, mould and condensation. This will ensure that employees are able to advise residents or escalate as appropriate

3.3 Identifying improvements from complaints

The identification, recording and following up on lessons learnt is central to our complaints process.

Additional training has been developed on:



Complaints and personal data procedures



Responding to and preventing anti-social behaviour, following a HOS determination



Rent accounts and understanding of arrears, together with quality of written communications



The procedure for contacting relatives



The decanting policy which outlines the process when residents need to temporarily leave their accommodation

Other organisation-wide learning includes:



The development and implementation of Housing 21's Unacceptable Behaviour Policy



The need to be careful with our language and not refer to Anti-Social Behaviour (ASB) issues or concerns as complaints. Further guidance is being developed to help clarify

Changes to policies

There have also been changes to current policies or the introduction of new ones following HOS cases.

The new policies include:



Pests policy following an infestation of bed bugs







Unreasonable behaviour policy which defines what is unreasonable and unacceptable behaviour and how we will manage this to ensure a safe, respectful and inclusive environment






Damp and Mould policy

Policies which have been changed as a result of resident complaints include:

-  Permission to access properties
-  Master Keys policy which was updated to provide clearer guidance for employees
-  Aids and Adaptations policy which was updated to be more explicit about timescales in responding to requests to give clarity to residents
-  Safeguarding Policy to include referral to the Office of the Public Guardian alongside the Social Services Department if someone with a Power of Attorney is involved

At a national level, procedures have been improved for:

-  Repairs communications
-  Rent accounts and Direct Debits
-  Proactively making appointments for attendance, tracking repairs, and updating residents and ensure contractors are not showing up without pre-arranged appointments



4. Performance April 2024 – March 2025

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4.1 Tenant Satisfaction Measures (TSMs)

The recently introduced Tenant Satisfaction Measures include a question on satisfaction with complaint handling.

The 2024 satisfaction level was 60 percent, this is an increase of 12 percent from the previous year.

Where schemes have achieved a low satisfaction score, an action plan has been developed. We will continue our work on ensuring that residents understand this question as results indicate that far more state they have made a complaint than the number recorded.

We are also required to report on complaints per 1,000 properties:



2024/ 25: 12.7



2023/ 24: 6.5

4.2 Compliments

We always welcome and value compliments about our employees and services.

We have received a total of 1,067 compliments this year, 79 percent were about employees/teams, 18 percent about our services, and three percent about our contractors.

A total of 199 schemes have received compliments (in 2024/25) without having had any complaints raised.

This suggests that in many cases residents do experience high levels of satisfaction and do not see a need to engage with the complaints process.



4.3 Complaints

In the year 2024/25 we received 297 complaints, compared to 148 in the previous year.

Of the 297 complaints received, the majority related to repairs and maintenance (29 percent), employees (24 percent), and housing services (16 percent).

Repairs and maintenance also accounted for the highest proportion of service requests at 39 percent, followed by care (17 percent) and other (13 percent).

While the overall number of complaints has risen significantly, the rate of escalation has declined, the proportion of complaints escalating from Stage one to Stage two has decreased over time from 22 percent in 2022/23 to 14 percent in 2024/25 indicating that a higher proportion complaints are being resolved satisfactorily at Stage one.

Stage two escalations have declined in the past three years however, some subjects are more prone to escalation.

Employee-related complaints see the highest likelihood, with around a quarter to a third escalating each year: 28 percent in 2022/23, 24 percent in 2023/24, and 21 percent in 2024/25.

Housing services has a notable escalation rate, especially in 2023/24 with over a third escalating. In contrast, repairs and maintenance, despite having the highest complaint volume, sees fewer escalations proportionally, only seven percent in 2024/25.

4.4 Our performance against targets

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Our performance this year against the response targets times, which have been set to correspond with the times specified in the Housing Ombudsman Complaints Handling Code, are as follows:

- Acknowledgement of stage one complaints within five working days
 - We achieved 97 percent (eight outside timescale)
- Response to stage one complaints within 10 working days
 - We achieved 94 percent (eighteen outside timescale and four still in progress)
- Response to stage two complaints within 20 working days
 - We achieved 98 percent (one outside target)

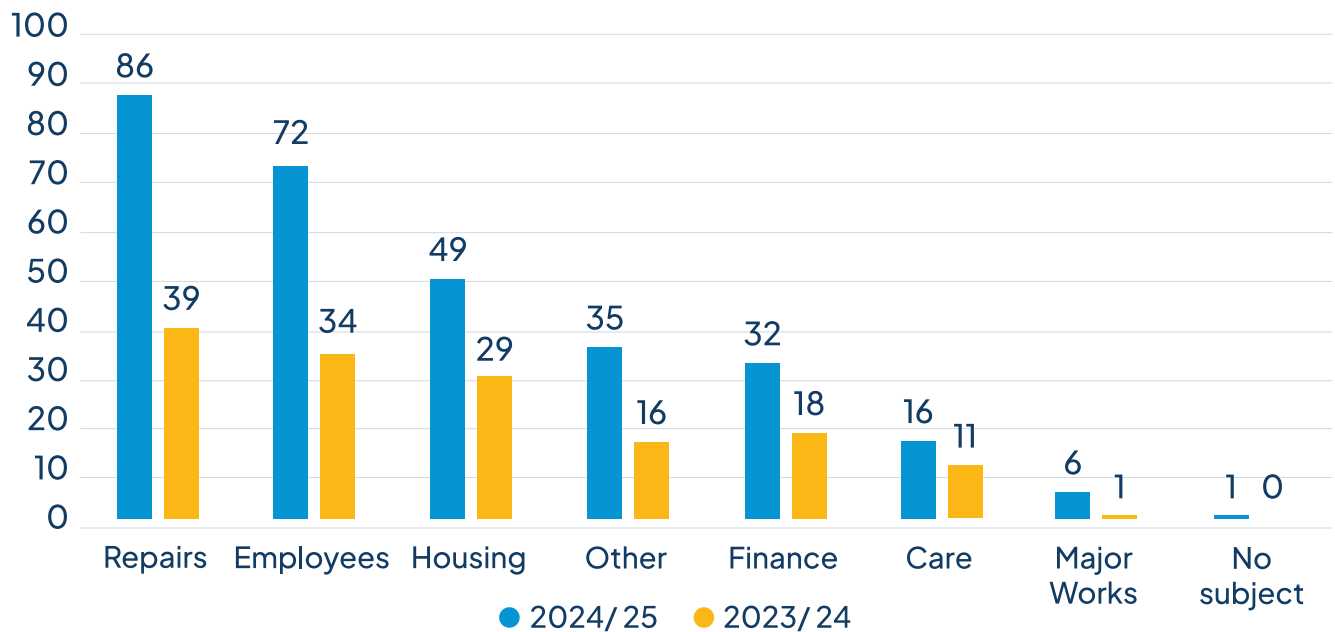
To achieve the 100 percent target of meeting deadlines we are delivering bespoke training to stage one complaint handlers.

This includes reinforcing the importance of adhering to the CHC timescales as well as the principles which underpin a good response including empathy, impartiality and a thorough investigation resulting in an accurate well written response.

The requirement to adhere to the timescales of the Housing Ombudsman is reinforced to stage two complaint handlers. The ability to extend the timescales, if a valid reason exists and the complainant consents, is being emphasised.

Chart one below shows the areas in which we receive complaints. Comparison with the previous year shows that repairs complaints remain the highest, followed by employees and housing services.

Chart one: Complaints subjects, 2023 – 2025



Complaints about repairs is low when compared to the number of work orders raised. In Extra Care, there were just 32 complaints from over 35,000 work orders (0.9 per 1,000), while Retirement Living saw 50 complaints from nearly 49,000 work orders (1.6 per 1,000).

The top areas for complaints are repairs and employees. The main themes occurring under these areas and ASB, as well as overarching themes are outlined below:

Repairs

- Heating and / or hot water not being available due to delays in it being fixed.
- Boilers being installed and not working immediately
- The cost of electric heaters
- Contractors not attending in a timely way / delays to repairs
- Misunderstanding of contents and building insurance and what is the responsibility of the resident as opposed to the landlord

Employees

- Residents feeling that employees are not behaving in a professional manner
- Residents feeling that disciplinarys or dismissal should take place
- Managers being away from schemes

- The fact that residents feel that incidents are not thoroughly investigated.
- Residents feeling that the incident was not handled appropriately.
- The involvement of the police was not appreciated

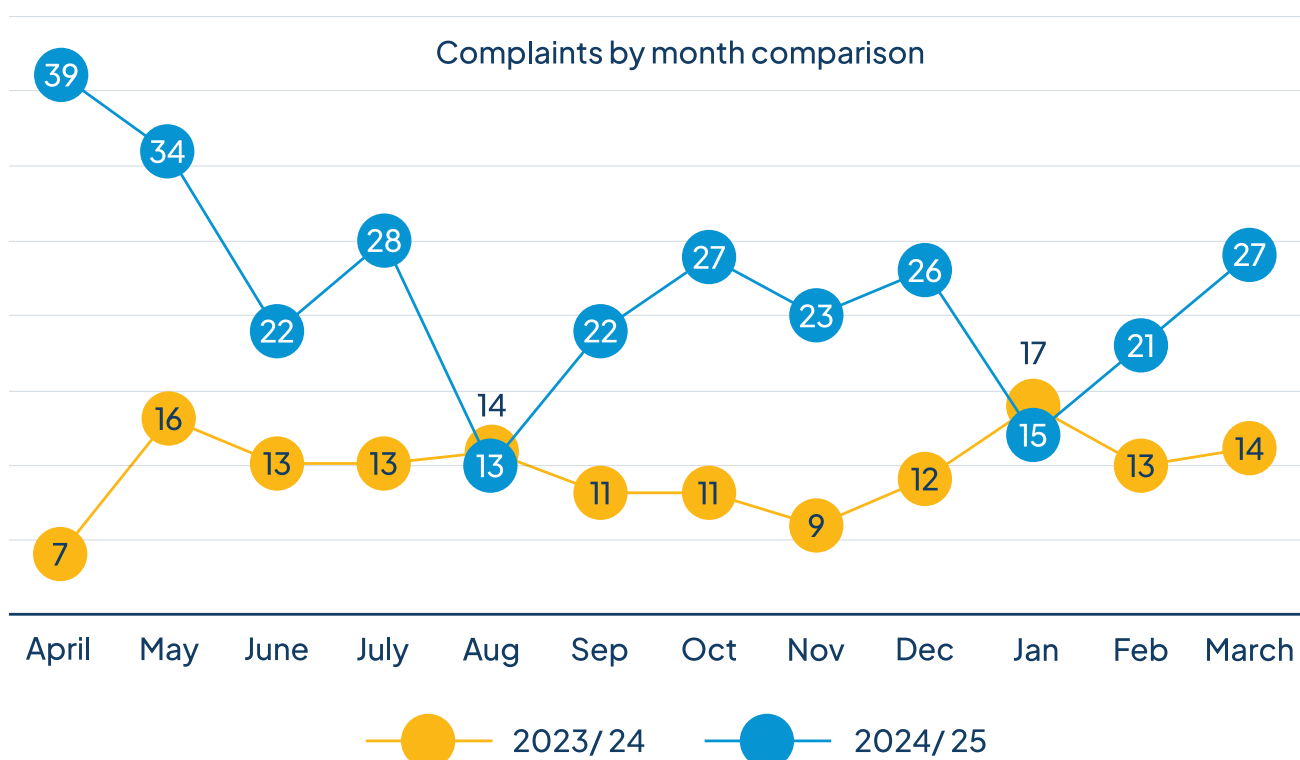
Overarching themes

- Lack of / timeliness of communication
- Compensation wasn't always welcomed and felt like it distracted from the complaint
- Inaccuracies in correspondence with residents
- Different understanding of how complaints should be dealt with
- In consistent dealings / communication with Lasting Power of Attourney

The chart below provides month on month comparison between 2024/ 25 and the previous year. With the removal of the informal stage, the number of complaints recorded has more than doubled, this is reflected evenly across both Extra Care and Retirement Living. The initial impact was seen in April when the new CHC came into effect, we attribute this to local managers being cautious and recording interactions as a complaint rather than as a 'service request' which may not have been fully understood in the early days of the CHC. There has been a gradual downward trend over the year.

The complaints data was analysed against repairs orders raised and there was some correlation between the dip in repairs in August and September (as is the norm) and the number of complaints raised.

Chart two: Complaints by month, 2023/ 24 and 2024/ 25



Complaints not accepted

The CHC allows us to reject a complaint if it does not meet the requirements of our policy. Only 21 complaints were not accepted during the year. Table one shows that the most common reason was linked to it being a first-time service request as opposed to a complaint. The second most common reason was the service not being Housing 21’s responsibility.

Table one: Complaints not accepted and reasons

| Reason given | Extra Care | Retirement Living | Corporate | Total |
|--|------------|-------------------|-----------|-------|
| First time request for service | 4 | 5 | 0 | 9 |
| Complaints occurred over 12 months ago | 1 | 2 | 0 | 3 |
| Non-Housing 21 resident | 1 | 0 | 1 | 2 |
| Service not Housing 21 responsibility | 4 | 2 | 0 | 6 |
| Anonymous complaint | 1 | 0 | 0 | 1 |
| Already considered under the complaints policy (both stages) | 3 | 1 | 0 | 4 |
| Total | 14 | 10 | 1 | 25 |



4.5 Residents characteristics

The majority of current residents are between the ages of 70 and 89. From the 297 complaints we received, over half (57 percent) came from this age group, which aligns with the demographic makeup of our resident population.

In terms of ethnicity, whilst 91 percent of our residents identify as White British, this group raised 81 percent of all complaints. This slight underrepresentation suggests that complaints are somewhat more distributed across other ethnicities, although these groups make up a smaller proportion of the overall population. Additionally, a few complaints had no ethnicity data recorded at all.

The gender distribution of residents is roughly nearly equal. Complaints originating from females was higher than males at 55 percent and 42 percent respectively. Three percent of records did not record a gender.

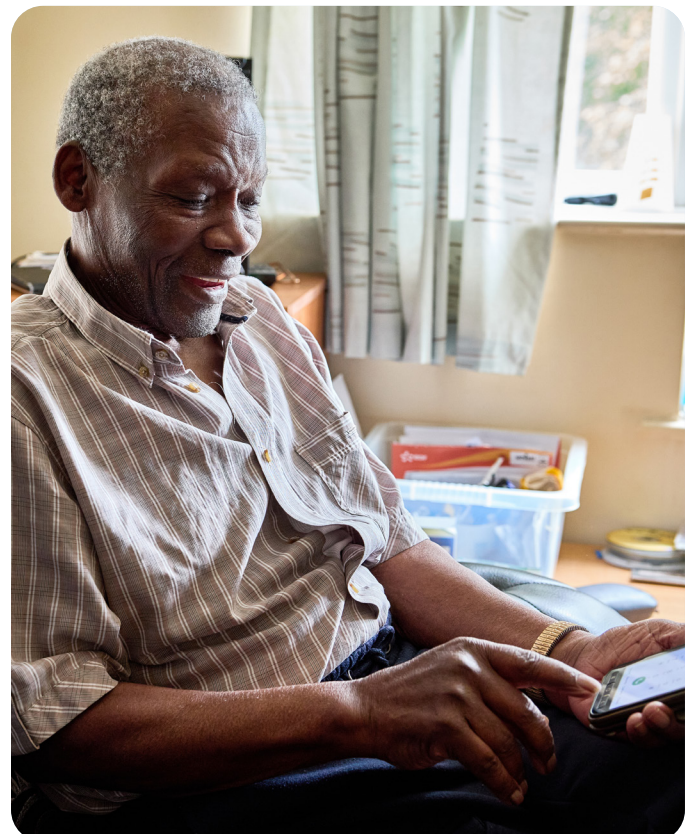


4.6 Benchmarking

Benchmarking data has been acquired from Acuity, our research partner which undertakes the TSM perception questions. They hold TSM data for a large number of housing providers.

On average 26 percent of residents reported making a complaint in the last 12 months which would result in nearly 6,000 complaints as opposed to the 297 recorded.

Satisfaction with complaint handling as measured by the TSM was 60 percent in 2024 which compares favourably to the average score from Acuity clients of 36 percent.



4.7 Vulnerabilities and reasonable adaptations

It's important that any vulnerabilities are considered and reasonable adaptations put in place to support a resident through the complaints process. The data shows us that 27 percent of complaints recorded a vulnerability.

Of those vulnerabilities, mobility issues were most common at 16 percent, followed by medical at six point one percent, other at four percent, and hearing disabilities just over one percent.

 53 percent had not applicable listed for impairment

 18 percent reported no impairment

Table three then shows where a reasonable adjustment has been noted against a complaint. Only five percent of complaints recorded the need for a reasonable adjustment. Further work will focus on ensuring that this is a true reflection of the situation rather than under recording as this is a field which was integrated into the system halfway through the year.

Table two: Vulnerabilities

| Vulnerability | Total | Extra Care | Retirement Living | Corporate |
|---------------|-------|------------|-------------------|-----------|
| Yes | 36 | 22 | 14 | 0 |
| Total | 224 | 112 | 108 | 4 |

Note: 224 is the total number of records not complaints as the records are updated if the complaint moves to stage two.

Table three: Reasonable adjustment recorded, June 2024 to January 2025

| Reasonable Adjustment | Total | Extra Care | Retirement Living | Corporate |
|-----------------------|-------|------------|-------------------|-----------|
| Yes | 9 | 4 | 5 | 0 |
| Total | 224 | 112 | 108 | 4 |

4.8 Compensation

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During the year ccompensation was offered in 58 percent of all complaints, totalling £64,134.35 across 171 cases, with an average of £375 per complaint.

Care-related complaints had the highest average compensation at £1,115.

Repairs and Maintenance saw the most compensated complaints overall (59 cases), though the average offer was lower at £270.



4.9 Housing Ombudsman Cases and Inquiries

In the year to April 2024 to March 2025 we received and submitted 11 case requests (seven Retirement Living and four Extra Care). Over this period, we acknowledged and actioned 14 inquiries (11 Retirement Living and 3 Extra Care).

An inquiry is usually a check from HOS when a complainant contacts the service as to whether the landlord complaints process has been completed. This can then instigate the process if not and close the HOS inquiry down. A case can be actioned by the HOS when both stages of the complaint procedure have been completed and they are satisfied that the complaint falls within their jurisdiction. Case requests have a target timescale of three weeks for us to submit. However, it can take many months for the Housing Ombudsman to process and so determinations can often relate to a previous financial year. Our target is zero at fault cases.

Housing Ombudsman determinations

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The eleven case requests have, so far, resulted in eight determinations. Housing 21 was found to be at fault in two of these resulting in two maladministration's and one service failure:



Case one – maladministration and service failure

maladministration relating to the handling of concerns relating to heating and the temperature of the property service failure linked to the handling of the complaint



Case two – maladministration

maladministration relating to handling of the complaint

Two of the determinations received this year related to complaints handled in 2023-24 period – both were found as no maladministration or resolved by reasonable redress.



This publication has provided information about our complaint handling and highlighted areas where we could make improvements. This section details where our focus will lie in the coming year.

5.1 Introducing a new target

We currently have the following targets:



0 findings of maladministration from the Housing Ombudsman Service



100 percent of acknowledge letters and complaint responses sent within the CHC timeframes

We are introducing a new target to achieve 90 percent of complaints being resolved at stage one and not progressing to stage 2. In seeking to achieve that, we will place even more focus on the strength and robustness of investigation and response at stage one. We will closely analyse stage one responses, identify any areas of weaknesses which will result in an improvement plan.

5.2 Ensuring local employees are confident with the complaints process

We will continue the training which we have put in place and target those schemes who have identified as 'requires improvement'.

Analysis will be undertaken of the complaints data to identify schemes with a high or low / nil volume of complaints. Work will take place to identify why they are in this situation and training and support put in place where required.

Unfortunately, we have heard of cases where residents are not willing to make a complaint for fear of repercussions. We will work to more fully understand this and put in place reassurances that this will never be the case.

5.3 The Residents Complaints Panel

Our resident complaints panel is going from strength to strength with two resident Board / Committee members taking leading roles in the group. The Member Responsible for Complaints also has an open invitation to that group

Meeting on a quarterly basis the panel will continue to review a sample of our complaint responses and make suggestions for improvement. The panel will continue to coproduce the Complaint Handling Code Self-Assessment and critically assess the Compliments and Complaints policy and procedure as well as resident facing complaints information to ensure its accessibility and understandability.

We would like to see more residents join the complaint panel as well as increase its diversity. We are planning a campaign to achieve these aims.

5.4 System Improvements

The current complaints system sits independently from the main housing system and has its challenges. We are in the process of exploring the feasibility and scope for a case management module within our current housing system which will enable us to consolidate all resident data within one platform, allowing greater data analysis and resulting insights.

A PowerBI dashboard (business intelligence tool) is being developed which will allow for a better oversight of all complaints data, enabling better use of the data for insights and intelligence.

There will be a focus on further triangulation of data. The dashboard will also be used to inform management conversations by enabling all employees to access complaints data to identify any training or support required.

5.5 Recording and monitoring vulnerabilities

As an older person's housing provider, many residents have vulnerabilities and conditions which we need to take into account when responding to complaints.

The data contained in this report suggests that we need assurance that it is being accurately recorded.

We are also aware that the level of vulnerable residents is increasing and we need to ensure that this does not result in any barriers for complainants.

We will explore providing an advocate for residents where this may be the case to aid them through the complaints process.

5.6 Service improvement

For the first time we have split the complaints function into the operational work of responding to complaints and all of the associated recording and reporting away from that which is considered more strategic. By separating these two elements, more focus can be placed on using the Housing Ombudsman resources and ensuring integration of these into our day to day work on complaints. We will also introduce more quality controls outside the complaints team, enabling more objective critiquing of the service.

Complaints should lead to improvements for the resident and the service as a whole and we will put an even greater focus on adequately closing a complaint, ensuring that all parties involved throughout the complaints process are aware of the outcome and the resulting actions which need to be undertaken.



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We invest in people Platinum



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