



Annual Complaints Performance and Service Improvement Report 2023/24

1.0 Statement from Hightown's Board

As Chair of Hightown's Board, I am pleased to share Hightown's Annual Complaints Performance and Service Improvement Report 2023/24.

A positive complaints handling culture is a priority for the Hightown Board and staff across the Association. We value feedback from residents and recognise that complaints provide valuable opportunities to learn from residents' experiences and improve services for the benefit of all residents.

It has been a challenging year for the housing sector, with complaint volumes increasing sector-wide over the year. Hightown has been working hard to improve services and reduce customer complaints, but this has been countered by an increased awareness of housing sector complaints processes through national and local publicity. Hightown has improved publicity of our complaints process, and during the year updated our complaints policy to capture more formal complaints; this inevitably led to an increase in the number of complaints received. We have also seen an increase in determinations from the Housing Ombudsman as the service has expanded and is clearing their own backlog of cases.

We are aware that service improvement is a continuous journey and there remains areas where improvements are needed at Hightown. The Board will continue to monitor progress and provide constructive challenge to ensure that Hightown maximises opportunities to hear the resident voice through complaints and can be effectively held to account when things go wrong.

On behalf of the Board, I confirm our approval of this report and the service improvement plan to ensure learning from complaints and improvements to service delivery for Hightown residents.

Bob Macnaughton

Chair

4th July 2024

2.0 Introduction

Hightown is committed to providing excellent services to all customers, but we recognise that sometimes things go wrong. We welcome complaints as an opportunity to learn, and to help us improve and develop our services. When we receive a complaint we will try to put things right as quickly as possible.

Hightown is a member of the Housing Ombudsman Scheme, administered by the Housing Ombudsman Service (the Ombudsman) which is an independent body which investigates complaints when they are not resolved internally. You can find out more about the Housing Ombudsman Service on their [website](#).

The Ombudsman published a new statutory Complaints Handling Code (the Code), which came into force from 1st April 2024. The Code aims to empower residents to complain to their landlord and sets out statutory requirements for landlords to respond to complaints at the earliest opportunity in a way that is effective and fair.

Social landlords like Hightown must comply with the Complaints Handling Code and carry out an annual self-assessment to ensure compliance. Social landlords are also required to complete and publish an annual complaints performance report and service improvement plan.

Section 8.1 of the Complaints Handling Code sets out the requirements of the annual report as follows:

Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:

- a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.*
- b) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;*
- c) any findings of non-compliance with this Code by the Ombudsman;*
- d) the service improvements made as a result of the learning from complaints;*
- e) any annual report about the landlord's performance from the Ombudsman; and*
- f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.*

This report outlines Hightown's annual complaints performance for the 2023/24 financial year, which provides information on number, nature, outcomes and learning points from formal complaints recorded under our [complaints policy](#) from 1st April 2023 to 31st March 2024.

3.0 Hightown's Complaints Process

Hightown has a two stage formal complaints process. Our Complaints Policy was updated in November 2023 to remove reference to an early resolution step in complaints handling to ensure ongoing high compliance with the Housing Ombudsman's Complaints Handling Code 2022 and to prepare for the introduction of the new statutory Complaints Handling Code from 1st April 2024. Following Board approval of the revised Complaints Policy on 16th November 2023, all initial complaints which would previously have been recorded as early resolution have been logged at Formal Stage One.

4.0 Hightown's Complaints Handling Code Self-Assessment

Hightown carried out a self-assessment against the Ombudsman's Complaints Handling Code, which found Hightown is 100% compliant with the Code.

The full self-assessment can be found at Appendix 1 to this report.

5.0 Complaints Handling Performance 2023/24

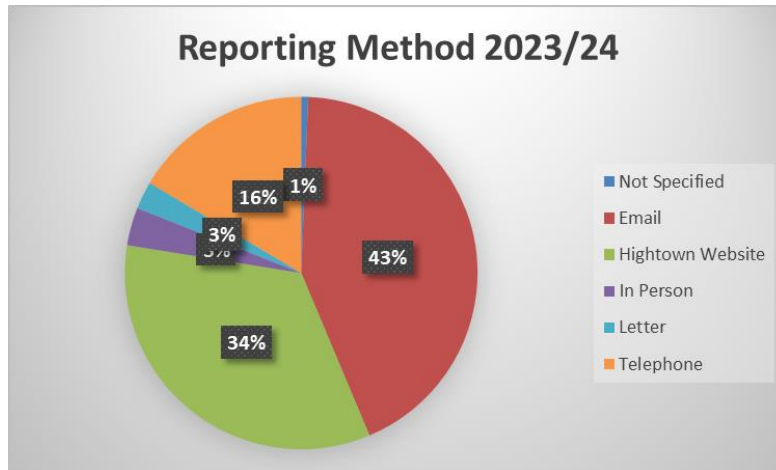
Hightown received **316** formal complaints during 2023/24, a 40% increase from 2022/23.

In 2023/24 **257 Stage One** and **59 Stage Two** complaints were recorded. There was a 40% increase in the number of complaints escalated to Stage Two in 2023/24 compared to 2022/23.

Method of complaint

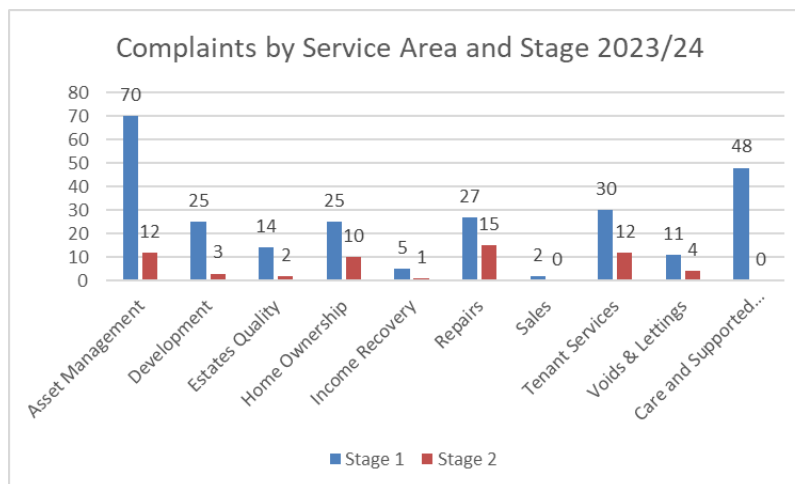
In accordance with the Complaints Handling Code, Hightown accepts complaints through all channels to ensure that residents can make a complaint in the way which best suits them.

The table below shows that the vast majority of complaints (77%) are received electronically either through the Hightown website or via email.



Complaints by Service Area

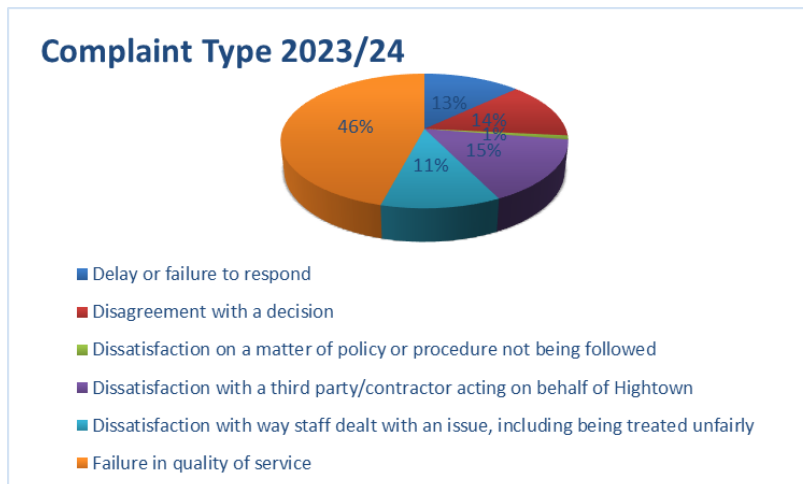
The table below sets out the service areas to which complaints related. The highest proportion of complaints were about property related issues in Asset Management.



Although Asset Management received the highest number of Stage One complaints, the highest proportion of complaint escalations to Stage 2 involved complaints about Hightown's Repairs service (56%).

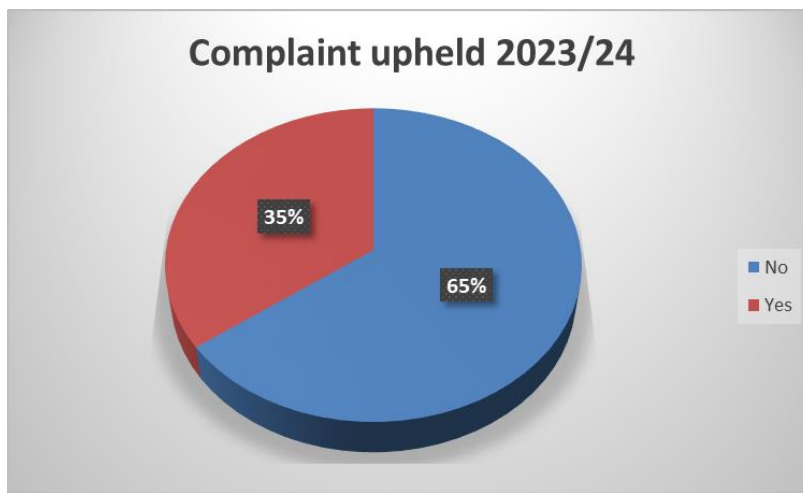
Complaint Type

When Hightown logs a complaint, it is categorised by type. The table below shows the breakdown of the complaint types. Failure in quality of service was the most common cause of complaint, making up 46% of complaints recorded.

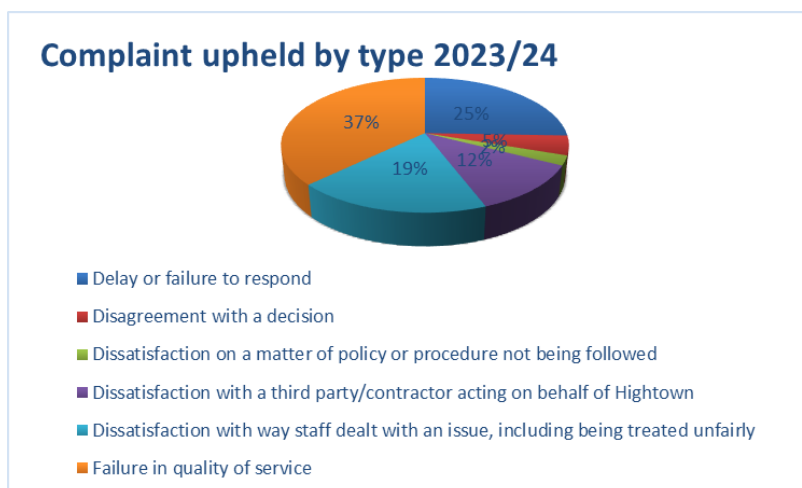


Complaint outcomes

35% of complaints received through Hightown's internal complaints process were upheld. Where a complaint had more than one element, if any but not all of the elements of the complaint were upheld this has been included in the upheld data.



The table below shows complaints upheld by Complaint Type. 37% of upheld complaints related to a failure in the quality of service provided by Hightown, which is the highest category of overall complaints.



6.0 General Needs rented and Home Ownership complaints

During 2023/24, 268 complaints were logged from general needs residents, including homeowners. The table below shows the complaints logged, by stage, for the last three financial years:

Complaint Stage	2021/22	2022/23	2023/24
Early Resolution (before November 2023 only)	125	109	85
Stage 1	23	42	124
Stage 2	17	17	59
Total	165	168	268

There was a significant increase (63%) in the number of complaints logged in 2023/24 than in 2021/22 and 2022/23 where the number of complaints were broadly consistent. The increase in the number of complaints compared to previous years is attributable to the increased publicity of social housing complaints, Hightown's communications with residents about our complaints process, and the removal of the Early Resolution step in complaints handling from our policy in November 2023.

6.1 Stage 1 Complaints (General Needs)

The table below shows the number of Formal Stage 1 complaints by service area and the theme of the complaints in 2023/24:

Service Area	Complaint Theme
Asset Management	<ul style="list-style-type: none"> Action taken regarding damp and mould Pigeon netting request Grounds maintenance Delays in works carried out Condition of bin store and dumped rubbish Cleaning in communal areas Broken lift Property condition (excluding damp and mould)
Development	<ul style="list-style-type: none"> Defects/quality of home Delays in developer remedial works Damp and mould
Estate Quality	<ul style="list-style-type: none"> Decoration and cleaning standards in communal areas

	<ul style="list-style-type: none"> • Unexpected contractor visit
Home Ownership	<ul style="list-style-type: none"> • Service charges refund • Shared ownership sales process • Grounds maintenance • Damaged floor • Condition of bin store • Property valuation during staircasing • Remortgage costs and title transfer • Lack of parking enforcement
Income Recovery	<ul style="list-style-type: none"> • Staff member
Repairs	<ul style="list-style-type: none"> • Recharges • Defect repair • Delay in repairs • Staff member • Damp and Mould
Tenant Services	<ul style="list-style-type: none"> • Anti-Social behaviour case management • Rejection of application for housing • Member of staff • Communal cleaning • Parking issues • Dog fouling • Alleged discrimination
Voids & Lettings	<ul style="list-style-type: none"> • Recharges following ending the tenancy • Condition of property at relet

6.2 Stage 2 Complaints (General Needs)

The table below shows the number of Formal Stage 2 complaints by service area and the themes of the complaints:

Service Area	Complaint Theme
Asset Management	<ul style="list-style-type: none"> • Action taken regarding water penetration • Overhanging trees and branches falling into garden • Leak in property and standard of flooring replaced by management company • Lift out of service • Outstanding works to property • Damp and Mould • Standard of garden works carried out
Development	<ul style="list-style-type: none"> • Solar panels not being used to reduce costs to resident • Defects • Poor communication
Estate Quality	<ul style="list-style-type: none"> • Grounds maintenance • Damp and Mould
Home Ownership	<ul style="list-style-type: none"> • Garden maintenance • Arrears • Parking issues • Defects • Delays in sales process • Title error • Service charges

Income Recovery	<ul style="list-style-type: none"> • Handling of joint to sole tenancy request
Repairs	<ul style="list-style-type: none"> • Time taken for works to property • Standard of repair • Damp and Mould • Lift breaking down
Tenant Services	<ul style="list-style-type: none"> • Parking and access to electric vehicle charging point • ASB case management • Noise Nuisance • Rejected housing application
Voids and Lettings	<ul style="list-style-type: none"> • Condition of property at relet • Void recharges

6.3 Care and Supported Housing Service user complaints

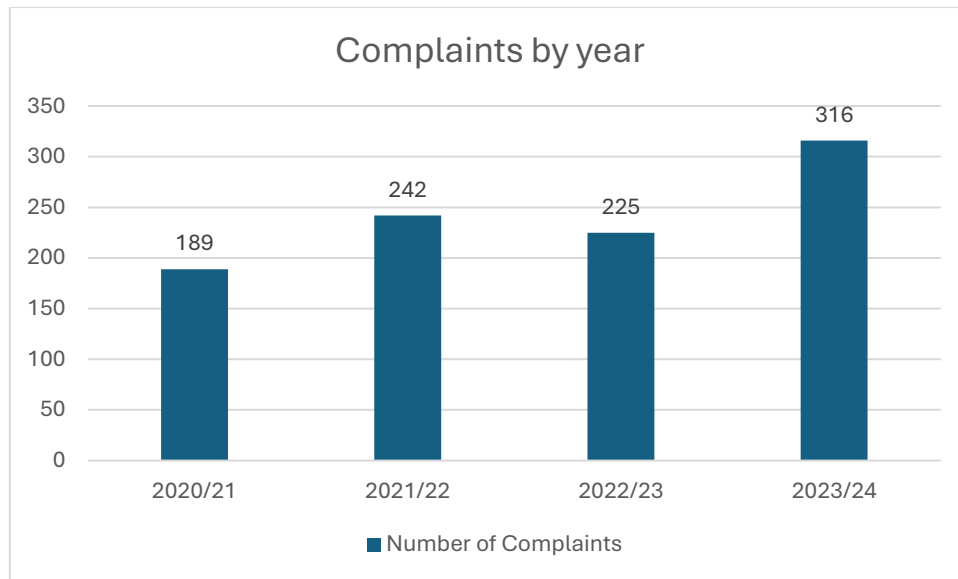
During 2023/24, 48 complaints were logged, (compared to 56 in 2022/23). This continues the downward trend of complaints in Care and Supported Housing. Prior to November 2023 all complaints were resolved informally (26) or at Stage 1 (22). There were no escalations to Stage 2.

The breakdown of numbers and types of Care and Supported Housing complaints is as follows:

Complaint Type	
Delay or failure to respond	2
Disagreement with a decision	2
Dissatisfaction on a matter of policy or procedure not being followed	1
Dissatisfaction with a third party/contractor acting on behalf of Hightown	1
Dissatisfaction with the way staff dealt with an issue, including being treated unfairly	17
Failure in quality of service	25

6.4 Complaints Trends

The following graph shows number of complaints received over the last four financial years. It shows there was a 40% increase in the number of complaints from 2022/23 and 2023/24.



The increase in the number of complaints can be attributed to increased publicity of social housing complaints and improvements in the way in which Hightown records complaint information. We see the increase in the volume of complaints as a reflection of our improving complaints handling culture.

6.5 Complaints Not Accepted

Hightown will always look at individual circumstances when a complaint is made, however there are some circumstances where it is not appropriate to raise the matter as a complaint for investigation under our complaints process. The circumstances under which Hightown will not accept a complaint are set out in our [Complaints Policy](#).

In 2023/24 we advised a resident that we could not investigate complaints they raised due to the matters having already been investigated and provided information about the Housing Ombudsman Service to the resident.

6.6 Ombudsman Determinations 2023/24

Where the Housing Ombudsman Service investigates a complaint, they provide an investigation report and determination letter to the complainant and the landlord. The Housing Ombudsman has 6 categories of findings, as set out below. The Ombudsman can make multiple findings in individual complaints, therefore the number of findings for a landlord is often higher than the number of cases the Ombudsman has issued a decision on:

- **Maladministration** – where the landlord, for example, has failed to comply with its legal obligations, its policies and procedures or unreasonably delayed in dealing with the matter. This could be a finding of service failure, maladministration or severe maladministration, depending on the seriousness of the failure and the impact on the resident.
- **Partial Maladministration** – where there are multiple findings following investigation within one determination and at least one, but not all, of these is maladministration.
- **No Maladministration** – where the landlord is found to have acted appropriately.
- **Redress** – where the landlord made redress to the resident which resolved the complaint satisfactorily in the Ombudsman's opinion.
- **Resolved with Intervention/Early Resolution** – where the complaint was resolved with the Ombudsman's intervention.
- **Outside Jurisdiction** – where the Ombudsman did not have the authority to investigate. This could be for a variety of reasons including: the complaint had not

been made within a reasonable timescale; the complaint did not meet the conditions of the Ombudsman's Scheme; or the matter was more appropriately dealt with by the courts, a tribunal, another complaint handling body or regulator.

Hightown received 5 final determinations from the Housing Ombudsman Service during 2023/24. 2 determinations related to Tenant Service, 2 to Development and 1 to Asset Management. There was a total of 12 findings in the determinations, broken down as follows:

- 6 Maladministration
- 2 Service Failure
- 1 Reasonable Redress
- 3 No Maladministration

Service Area	Complaint Subject	Ombudsman Determinations
Tenant Services	Anti-Social Behaviour case management Handling of inconsiderate parking Complaint Handling	Maladministration in respect of Hightown's response to reports of Anti-Social behaviour No Maladministration in respect of Hightown's response to reports of inconsiderate parking Maladministration in respect of complaints handling
Asset Management	The temperature within the complainant's home	Maladministration in Hightown's response to the complainant's concerns about temperature in the home Maladministration in respect of complaints handling
Development	Defects in new build property	Service failure in response to the reports of defects Maladministration in respect of complaints handling
Tenant Services	Property condition following mutual exchange	Reasonable Redress in the way Hightown handled concerns about the condition of the property Service failure in respect of complaints handling
Development	Defects in new build property	No maladministration in respect of repairs reports No maladministration in respect of handling of concerns about the developer's subcontractor Maladministration in respect of complaints handling

Review of the determinations received from the Ombudsman has highlighted a theme of findings of maladministration or service failure relating to complaints handling. One finding of service failure related to the Early Resolution provision for complaints handling in Hightown's policy, which was subsequently removed from the policy in November 2023. Hightown acknowledges that improvements are needed to complaints handling, and the future plans for service improvement in this area are set out in the Service Improvement plan below.

6.7 Hightown's Engagement with the Housing Ombudsman Service

In October 2023, the Ombudsman reviewed Hightown's compliance with the Complaints Handling Code. The Director of Housing and Head of Housing met with the Ombudsman's Compliance and Systemic Lead and overall the feedback was positive regarding Hightown's compliance with the code and engagement with the Ombudsman's review process. The Board approved a revised Complaints Policy in November 2023 following recommendations made by the Ombudsman Service, and we complied with the Ombudsman's requirement to confirm the outcome of the Policy review by the end of November 2023. Reviews of the Correspondence and Complaints procedure, website information and Making a Complaint leaflet were also completed and the changes communicated to staff.

A review of Hightown's Compensation policy was carried out at the same time as the complaints policy to ensure they align. There is an increased focus on remedies for complaints, including compensation, and a need was identified to ensure that staff managing complaints have the authority to offer appropriate levels of compensation where service failures have been identified through the formal complaints process.

6.8 Hightown's Annual Landlord Performance Report 2022/23 from the Housing Ombudsman Service

Each year, the Ombudsman publishes annual Landlord Performance Reports for landlords with five or more findings determined in the previous financial year. These reports are currently published in October of each year. The latest available performance report published by the Ombudsman applies to determinations made in the between 1st April 2022 and 31st March 2023.

Between 1st April 2022 and 31st March 2023, Hightown received determinations for two complaints from the Ombudsman. The Ombudsman made a total of five findings across the two determinations and published their annual landlord performance report for Hightown in October 2023.

The Ombudsman made four findings of maladministration and one finding of no maladministration, making five Orders and two Recommendations.

Based on the Ombudsman's findings of maladministration across the two determinations, they found an 80% maladministration rate, compared to a national average of 55%. A full copy of the Ombudsman's 2022/23 annual report for Hightown can be found at Appendix Two of this report.

6.9 Learning from Complaints

We are committed to learning from complaints and using feedback from our residents to improve services. In the 2023/24 year we have implemented learning from complaints by making the following improvements to our service delivery:

- Introduced an internal Learning from Complaints forum for complaints handling staff to monitor themes of complaints, share lessons learned and track actions for service improvements.
- Delivered refresher training for staff in the Property Services team on estate plans and serving TORTs notices.
- Reviewed information given to residents who are ending their tenancies to ensure clear guidance is given on clearing the property.
- Increased staff resource for damp and mould inspections to improve response times.
- Delivered refresher training for staff on the post inspection of voids once works are complete.
- Delivered refresher training on call handling.
- Delivered refresher training for staff in Property Services regarding repairs for shared ownership properties.
- Improved the way we communicate and keep residents informed of progress in Anti-Social Behaviour casework.
- Reviewed the void recharge process in full to ensure transparency and clarity.
- Reviewed the process for keeping residents informed of how repair works are progressing.
- Reviewed the way we give information on damp and mould to residents, and the feedback given on the way messages are delivered will be used to ensure that they are supportive and helpful to residents.
- Implemented a process to ensure that casework or complaints are reallocated if the member of staff investigating is absent or leaves Hightown's employment.
- Improved record keeping of refunds throughout the process and implemented a process to deal with requests more quickly.
- Reviewed the process for escalating issues which are the responsibility of a managing agent or outside of Hightown's jurisdiction so that residents are supported with this.
- Changed our process so that in future the Procurement Team will deal with the replacement of entry-phone systems, which should prevent delays occurring.
- Implements a checklist for Housing First to support new tenants when moving in.

7.0 Service Improvement - Planning ahead for 2024/25

The changes to Hightown's complaints process and the increase in the volume of complaints over the last financial year has highlighted a need for more resource to enable us to deal with complaints efficiently and to ensure all learning opportunities are captured and implemented.

In 2024/25, we will be restructuring the staff resource for complaint handling to introduce a new Complaints and Resolution team. Responsibility for complaints will transfer from the Housing directorate to Corporate Services. This change in responsibility will provide dedicated staff resource to focus on complaints to enhance objectivity in investigations and improve performance in relation to response times and early resolution.

We are also reviewing and implementing changes to the way in which we log and manage complaints to enhance monitoring and reporting and to enable us to further analyse patterns and themes of complaints.

We are introducing a new complaints satisfaction survey to gain more direct feedback from complainants.

Key complaints handling staff are enrolled on the Housing Ombudsman's Centre for Learning and will be undertaking elearning and training sessions provided by the Ombudsman.

A standing item of Learning from Complaints is being introduced for team meetings.

We are recruiting to a new Resident Involvement Officer post, who will be reviewing our resident engagement in the scrutiny of complaints. If you would like more information on how to get involved in our Complaints Scrutiny Group please click [here](#)

Appendix 1 – Annual Housing Ombudsman Complaints Handling Code Self-Assessment

Appendix 2 - The Housing Ombudsman Service Landlord Performance Report 2022/23 for Hightown Housing Association Ltd