



Scrutiny of Complaints at Havebury Housing Partnership

1. SCOPE

Initial scoping of communications scrutiny took place at our meeting of 8 November 2021. The scope was agreed as follows:

- To ensure Havebury's new complaints policy and procedure effects compliance with the Housing Ombudsman's (HOS) Complaints Handling Code
- To identify whether the application of the complaints policy is appropriate, effective, and fair

2. WHAT WE DID

During the scoping of the scrutiny, we agreed our review would be led by the HOS's self-assessment form and decided upon the ways in which this could be tested. On this basis the methodology below was agreed:

What will be reviewed	Details	How
Complaints overview	Gain an understanding of Havebury's current approach to complaints from the Customer Experience Manager	Invite to PSP meeting
Policy and procedure review	Review Havebury's complaints policy and procedure against the HOS Complaint Handling Code	Desktop review
Complaints Handling Code	Assess Havebury's position against the HOS's Complaints Handling Code	Desktop review
Quality of responses	Review a sample of complaint responses for quality and fairness	Desktop review
Customer journey mapping of complaints	Review customer journey mapping data covering complaints	Commission through Customer Experience Manager
Interview complaint handlers	Interview complaint handlers for their understanding and views on the complaints process	PSP splinter group meeting
Complaints data	Gauge performance and identify any trends through the analysis of complaints data	Desktop review
Make recommendations	Review evidence to identify recommendations	Desktop exercise

The complaints scrutiny review timetable is set out below. Performance and Scrutiny Panel and additional splinter group meetings were held in hybrid manner, with some members attending in person, others via TEAMS.

Action	Date
Scrutiny scoping	8 November 2021
Introduction to complaints at Havebury and the HOS Complaints Handling Code	8 November 2021
Review of Complaint Handling Code and initial assessment	31 January 2022
Review of complaints policies and procedures	31 January 2022
Interviews of complaint handlers	21 March 2022
Review of stage one complaint responses	21 March 2022
Complaints data analysis	21 March 2022
Analysis of complaints customer journey mapping	21 March 2022
Make recommendations	21 March 2022
Draft report	23 May 2022

3. OUR FINDINGS

- 3.1 Following the introduction of HOS's Complaints Handling Code, complaints at Havebury has been centralised with its management moved from the Performance to Customer Experience Team. We found that the Customer Experience Team take a more hands on approach in managing each complaint from its receipt to its response.
- 3.2 Management continue to play an important role in investigating and responding to complaints, but it is clear the role of the Customer Experience Team has enhanced the consistency of responses and provides a valuable point of contact for customers.
- 3.3 Our initial analysis of complaint examples as part of this scrutiny and in previous reviews identified some failings in customer service, but in discussion with the Customer Experience Manager found that these had been acknowledged and learning outcomes identified.
- 3.4 At times Havebury has stuck rigidly to policy, where flexibility to cater for the specific needs of the tenant would have been helpful, and some decisions made would have benefitted from peer review.
- 3.5 We noted that at the time of our review the HOS was updating their Complaint Handling Code, however it was not anticipated it would change drastically. The principles of the Code were sound and therefore we resolved to continue to assess Havebury's approach against the existing the self-assessment form.

- 3.6 We reviewed Havebury’s complaints policy and procedure (including the compensation policy) against the self-assessment and found it almost exhaustive in facilitating delivery against the Code. A variety of channels for customers to make complaints is detailed, an appropriate “complaints officer” (i.e. the Customer Experience Team) is in place ensuring autonomy/impartiality, and Havebury meets or exceeds the timescale requirements for responding to complaints set out in the Code.
- 3.7 Learning from complaints is a key aspect of the Code. We were shown data provided regularly to teams on complaint themes and suggestions for improvement, plus information reported through the governance structure. Whilst positive that this data/information is available, we feel it is important to ensure that a ‘feedback loop’ is in place, to demonstrate where learning and changes arising from that learning has had a positive impact on improving services and reducing complaints.
- 3.8 Havebury’s definition of a complaint in the policy is consistent with that detailed in HOS Code, and through our interviews with complaint handlers what constitutes a complaint is understood. We were uncertain however, whether the difference between a complaint, service request or dissatisfaction expressed by other means was clear for customers, albeit we acknowledge this is a challenge all service providers probably face.
- 3.9 Staff were also well appraised of the sector context around complaints and spoke of the benefits of the new approach and the support/consistency it provided. Of note were the enhancements made to the coordination of complaints involving multiple teams. The interviewees reported that there are peaks and troughs in complaints traffic e.g. during school holidays, when service charge letters go out, heating breakdowns at the start of winter etc, and that poor communication continues to be a theme in complaints being triggered.
- 3.10 Specifically we found that communication with tenants and between teams continues to be a particular issue where contractors are involved in the delivery of services.
- 3.11 It was clear that Havebury allows complaint handlers autonomy and flexibility in finding resolutions, but conversely there is inconsistency in management applying this constructively, particular prior to a complaint having been raised.
- 3.12 We looked in detail at several complaints not already reviewed by the Complaints Review Panel. We found the policy and procedure to have been followed in each case, and where compensation had been awarded this was appropriate and fair. Responses better followed our ‘tone of voice principles’ recommended in an earlier scrutiny. Application to other stock letters is being conducted in line with Havebury’s strategy over the course of two years, with many having already been completed and available on Cx.
- 3.13 The complaints data we analysed revealed that all complaints (for the period since 1 April 2021) had been acknowledged and resolved in time. Where

complaints had been placed on hold (and therefore the target time extended) this was done with good reason and with agreement of the customer.

- 3.14 We discussed that the greatest number of complaints arise from repairs and servicing functions. Whilst these are areas of significant customer contact and complaints continue to up make a tiny proportion of total interactions, the majority of failings in these areas relate to keeping the customer informed and fulfilling promises. In addition, we felt that cases of repeated breakdowns should be investigated to ensure alternative solutions e.g. boiler replacement, would facilitate better outcomes.
- 3.15 Acknowledging there are considerably more points of potential failure in a new build letting process than say a single repair, we found that as a proportion of new build completions, development generated the most complaints and had a higher rate of escalation to stage two than other functions.
- 3.16 Over 20% of stage one complaints escalate to stage two. With no benchmarking information yet available we were unable to draw an informed decision as to whether this is excessive, however we feel Havebury should review these cases to understand why they escalated and if any could have been resolved first time.
- 3.17 Analysis of complaints profiling data revealed that the proportion of complaints raised by younger age groups is greater than that of the proportion of the population. In addition, complaints are more likely to be raised by tenants also reporting a high number of repairs. We recommend that further analysis is carried out to understand the correlation between property types, repair volumes and complaints and whether there is opportunity to work more proactively where potential issues are identified.
- 3.18 The panel were keen to stress the importance of understanding the detail of this type of analysis and the risk it otherwise poses from drawing headline conclusions. For example, a greater proportion of complaints raised by younger tenants may reflect that these customers are more likely to be newer tenants and/or live in new build properties which in themselves might be the true drivers.
- 3.19 After using it in our previous scrutiny review, customer journey mapping again provided some useful insight for us into the customer experience around complaints. We would encourage Havebury to continue using this method as a tool for understanding and improving services.
- 3.20 For this scrutiny, the Customer Experience Team mapped three examples of the customer journey from the start of the initial issue to the final resolution of the complaint. The three examples covered missed appointments, a heating repair and a void/new tenancy.
- 3.21 In each instance, the customer experience was rated low at the initial reporting of the issue, but that once the complaints process was initiated, the open and responsive communication and final resolution increased this to match expectation.

- 3.22 The improvement in the customer experience once a complaint had been triggered was positive to see, however what preceded it echoed our previous findings that poor communication, failing to keep the customer updated and contractor performance/management had contributed to a complaint having initially been raised. All of which we felt was within Havebury's power to resolve.
- 3.23 We discussed whether Havebury was using gestures of goodwill e.g. a bunch of flowers, to apologise or say thank you and were advised that the HOS does not consider this appropriate in resolving complaints. However, we suggest that this be considered in some cases, post resolution, as it we feel customers would value this approach.
- 3.24 Another key element of the Code is around publicising the complaints process and the services of the HOS. We found commitments to this in the complaints policy and confirmed that the HOS is mentioned at each stage. We feel more could be done in this regard however, particularly on the website. At the time of our review, information on complaints was under the 'Corporate' section and should be moved so that it is front and centre for customers.

4. RECOMMENDATIONS

Based on our findings we make the following recommendations:

1. Ensure staff, through training or guidance, are empowered to be flexible in the application of policy and delivering excellent customer service
2. Establish a clear 'feedback loop' for learning from complaints, so that improvements are embedded, and benefits realised in reducing complaints and improving services
3. Provide clarity on the definition of a complaint for tenants, specifically the difference between a service request, expression of dissatisfaction and a formal complaint
4. Continue to build on work to improve communication with tenants and between teams, particularly where contractors are involved. Express to key contractors the importance of clear communication with tenants
5. Explore the peaks and troughs in complaints traffic so that where efficient to do so, activities that generate complaints at particular times of year are reviewed to mitigate reoccurring issues
6. Ensure staff have clear guidance on the autonomy and flexibility they have in resolving issues before something becomes a complaint. Using learning examples to identify which areas of the business this would benefit most
7. Establish whether the proportion of complaints escalating to stage two is excessive and could be reduced
8. Review the customer experience around new build properties to understand the reason for complaints and why a greater proportion than other functions escalate
9. Investigate more widely (i.e. over and above cases that have generated a complaint) instances of repeat breakdowns, generating multiple repairs, to establish whether a different approach is possible

10. Undertake more detailed complaints profiling, acknowledging the risk that there may be more nuanced factors driving complaints than headline analysis might suggest
11. Consider whether offering a gesture of goodwill e.g. a bunch of flowers, after a complaint is fully resolved would enhance the customer experience
12. Review where information about raising a complaint is located on the website and ensure it is front and centre, and easy to access

5. CONCLUSION

In conclusion, we refer to the question we aimed to answer at the beginning of the scrutiny:

QUESTION	CONCLUSION
To ensure Havebury's new complaints policy and procedure effects compliance with the Housing Ombudsman's (HOS) Complaints Handling Code	<p>We were satisfied that Havebury's new approach, policies and procedures satisfied the requirements of the code and that they were being applied consistently.</p> <p>There were some minor elements of the self-assessment we felt could be strengthened around learning from complaints and publicity of the process and Housing Ombudsman Service.</p>
To identify whether the application of the complaints policy is appropriate, effective, and fair	<p>The complaints process has benefited from being centralised, particularly in fostering consistency and the quality of response.</p> <p>The process and policy are effective in improving the customer experience, however, there remain improvements to be made in service delivery to prevent complaints occurring. Compensation is awarded in line with policy and is fair.</p>