

## CMT extract for Governing Body's response to our Annual Complaints Performance and Service Improvement Report

### **Complaints Handling**

The Strategic Housing & Business Support Manager attended for this agenda item. He advised this is an annual report and our Senior Complaints Officer had pulled a lot of the report together. The Assistant Director for Community & Housing Services advised the complaints element will sit in the business unit for the whole of housing.

The Strategic Housing & Business Support Manager advised that as part of being a member landlord, we are required to produce an annual report and self-assessment and update online for the Housing Ombudsman which we also have to publish. The reports can be found on the Council's website under the Housing Complaints page.

The Complaint Handling Code was originally about best practice. From the 1<sup>st</sup> April 2024, the Code became statutory so we are now required by law to follow its requirements.

We have done the assessment and the complaints handling code meets all the requirements. There were a couple of changes required. The code mentioned informal complaints which shouldn't have been there as these have to be formal. Also if someone wants a stage 2 complaint they don't have to tell us why. We have to make reasonable efforts to understand why they are unhappy so that has been changed.

We also have information on Tenancy Satisfaction Measures (TSMs) that have to be reported to the Housing Regulator. The Regulator will look at this element of complaint handling and will look to do an inspection if there are any issues.

Item 5 provides an overview of complaints and what standards we have achieved and the reasons behind that. More data is available on how we are performing with complaints and the reasons for these. It also includes learning from complaints. As part of the code we are required to show that we are learning and the Senior Complaints Officer will review the complaints and complete a learning form to send to service managers.

The Learning Type pie charts shows that the majority of complaints are for Repairs and Maintenance. As part of the annual report, we need to report this to the landlord's governing body. We need to consider whether this would be CMT or if it should go to committee, e.g. Executive. In the future, there will be a yearly report.

We have identified that we will meet with the Portfolio Holder quarterly to go through complaints, processes and what complaints we have received. The Housing Ombudsman and Regulator see complaints as important in improving social landlords.

The Chief Executive thanked The Strategic Housing & Business Support Manager for the overview and the Senior Complaints Officer for the report preparation.

The Director of Resources/Deputy Chief Executive asked if we would seek to compare against others and if they are nationally reported. He referred to the table in Appendix A and the evidence column which had very little real data in it.

The Strategic Housing & Business Support Manager advised we will be able to review the TSMs that will be done by the Regulator for all local authorities and registered providers. The Ombudsman will also produce data.

With regard to the table in Appendix A, it's not asking for us to complete anything more other than to identify where we meet the code and where it is located within our code. We did look at how other landlords had completed their self-assessment and it matched ours.

The Assistant Director for Planning & Leisure Services advised she felt the report should go to Members but whether it could go alongside other things, e.g. as part of the Council Plan, or if it would be better as a bespoke report. The Chief Executive advised she would pick up around governance at the end.

The Executive Director for Environment & Communities advised the standard is that we should be responding within 10 days for the majority of complaints but there are a few areas that are over that. He asked if we have comparison data to previous years to show whether or not there has been an improvement.

The Strategic Housing & Business Support Manager advised we have changed how we record our complaints so don't have that data. Before this was fully implemented, we would phone a customer and it would be closed down which doesn't follow the code. It has to be written and the template used so we will have comparative data next year.

The Executive Director for Environment & Communities asked if there were processes in place to improve the figures across the board. The Strategic Housing & Business Support Manager advised that the Senior Complaints Officer does a quarterly presentation on complaints to Housing DMT and also attends Manager meetings with R&M and Tenancy to talk about complaints.

The Chief Executive referred to paragraph 5.7 of the report, which states 50% of complaints were responded to outside of the 10 working days and needed to be extended to the 20 working days acceptable timescale. She queried if we have to respond within 10 days or 20 days. The Strategic Housing & Business Support Manager advised the code allows us to extend the timescale to 20 days for complex complaints or with the agreement of the complainant.

The Chief Executive commented that half of complaints have been deemed as complex. The Strategic Housing & Business Support Manager advised he would question whether they were complex or due to staff availability. The Chief Executive agreed that was the issue for her and we need more scrutiny around that element.

The Assistant Director Community & Housing Services advised she had met with the Assistant Director Environmental & Housing Property Services and The Strategic Housing & Business Support Manager to talk through and accept this is not what we should be doing. There were exceptional circumstances in the Assistant Director Environmental & Housing Property Services' team due to recruitment taking place. We have an action plan to review all those outstanding and accepted that we need to improve and recognise that should not put as complex if that is not the case.

The Chief Executive advised it is recognised that we have an ongoing issue which leads on to the governance around this. There are examples, not just for Housing, where there is no ownership in the service area. There are some examples in housing where the Senior Complaints Officer has been the responding officer but the sign off and ownership has to be with the responsible officer/ service manager.

The Assistant Director Planning & Leisure Services advised that she reads all complaints that are received as she could see the different threads to understand the wider context.

The Assistant Director Community & Housing Services advised due to the volume for housing, neither she or the Assistant Director Environmental & Housing Property Services would be able to view all these and see that sitting with 4<sup>th</sup> Tiers and agree they need to take responsibility and ownership and not for the Senior Complaints Officer. She had more involvement for Community Services as receive far less complaints.

The Chief Executive advised she didn't require CMT to see all complaints but her issue was around complaint responses going out in CMT's name without having sight of them. The Assistant Director for Community & Housing Services advised that all Stage 1 responses go out in the Senior Complaints Officer's name. For Stage 2 complaints it should be whichever senior officer has completed the complaint. The Strategic Housing & Business Support Manager advised this should have been happening from September 2023.

The Executive Director for Environment & Communities agreed with the Chief Executive that he didn't want things going out in his name that he had not seen. He agreed with The Assistant Director for Community & Housing Services that he would expect 4<sup>th</sup> tier within housing and environmental services to be drafting the responses. From an environmental perspective, they go out in Managers names and in Housing the response is provided to the Senior Complaints Officer. She is not the person who should be responding, and it should be managers in the service area. They should provide the full response and understand the requirements of that.

The Chief Executive advised that the final ombudsman response had been sent from the Senior Complaints Officer with no sign off or oversight. It is a one-off but it has happened. The Executive Director Environment & Communities advised the Senior Complaints Officer had pulled together all the information and sent this out. We are looking at this and need to have a different approach.

The Director of Resources/Deputy Chief Executive advised there is a hierarchy you go through for Revs & Bens complaints but Sarah filters things really well and will send to him if a signature is needed. Debra advised anything in Revs & Bens comes to her and she drafts the response.

The Chief Executive acknowledged that staff may collate and draft a response for us, but it is that final ownership of those issues. This will be picked up in the learning.

The Chief Executive asked what was required in terms of governance and sign-off. We have two levels of strategic leaders, e.g. political and organisational, and suggested whether we need advice. It would be good practice to share with Members but whether we need formal sign off by Executive.

The Executive Director for Environment & Communities agreed it was a good idea to get advice as it is a little vague and we have tried to find out from other councils and felt that we under-report. Community Safety does an annual report that goes to O&S. We have a Performance Portfolio Holder and whether that will generate anything. She queried whether she and the Assistant Director Environmental & Housing Property Services need to look at what others do in terms of reporting.

The Executive Director Environment & Communities advised the problem is this covers 2 areas - stockholding and social landlords. If they have a Board, they will report to the Board whereas we have 2 routes to take things. He agreed with The Executive Director for Environment & Communities that we under-report and queried whether it should go as part of the annual performance monitoring or a separate reporting line. He asked if The Executive Director for Environment & Communities and the Assistant Director Environmental & Housing Property Services could do more work around the route it could take, as it would be much better for Members to understand the full picture of where we are. It is also important to show progression and change over the years. The report shows year 1 of reporting in this way and we need to show we are improving on our figures. The Chief Executive suggested that we need to report quarterly to the Portfolio Holder as a minimum before we determine/agree this.

The Strategic Housing & Business Support Manager advised the code states it should go to the landlord's governing body and the governing bodies response should be published alongside it. The Executive Director Environment & Communities suggested that if the report went to Executive, the minutes would be published which would meet that requirement. The Director of Resources/Deputy Chief Executive advised it would also be scrutinised.

The Chief Executive asked for the report to be noted and there was an action to further investigate and explore the governance reporting.