



## The "combined Trusts" Residents Scrutiny Panel Complaints Scrutiny Report October 2025

### Our Partners:

- Sir Josiah Mason Trust (SJMT- [www.sjmt.org.uk](http://www.sjmt.org.uk))
- Yardley Great Trust (YGT- [www.ygt.org.uk](http://www.ygt.org.uk))
- Lench's Trust ([www.lenchs-trust.co.uk](http://www.lenchs-trust.co.uk))
- Solihull Care Housing Association (SCHA - [www.scha.org.uk](http://www.scha.org.uk))
- Harborne Parish Lands Charity (HPLC- [www.hplc.org.uk](http://www.hplc.org.uk))
- Broadening Choices for Older People (BCOP- [www.bcop.org.uk](http://www.bcop.org.uk))

### Background

#### 1. What is the Scrutiny panel, why was it formed and what will it do?



The Panel consists of residents drawn from the above Registered Providers who help to scrutinise the quality of services from their unique perspective as residents.

The Panel have been meeting formally from April 2025, supported by a paid facilitator, Emma Wilson from Yvonne Davies Consultancy. Emma met with most of the volunteers ahead of the April 2025 deadline and residents (and some staff members) benefitted from some training on modern methods of scrutiny, the Regulatory environment and the role of the Panel. The Panel developed a Code of Conduct and terms of reference.

We agreed to continue to meet monthly (with the exception of August) to progress tasks and met in person at a different scheme each time where lunch and a tour of each provider's accommodation and services was also appreciated.

Some of the RSP members met in between meetings and carried out additional work preparing bulletins for wider residents, attending coffee mornings and distributing and collecting surveys. The residents also benefitted from WhatsApp groups and email communication in between the monthly meetings.

We had some residents decide that the Panel wasn't for them or didn't attend regularly enough to keep up with the pace, however we acknowledge that scrutiny isn't for everyone and its hard work at times. Working in the task and finish groups suited some but not others and complaints is a challenging subject. We will hold a session in the new year to learn from our first project and apply that learning to the next project to try and ensure residents remain motivated.

Over the next two years the RSP have been tasked to undertake a number of scrutiny projects intended to critically examine services from a resident perspective and to comment on the effectiveness and efficiencies of these services, to identify any deficiencies or weaknesses (as well as highlighting and applauding examples of best practice) and making suggestions for service improvement were applicable.

In essence, the scrutiny panel aims to act as a critical friend to the providers using their own experiences and data gathered from residents to ensure that sheltered housing effectively serves its intended purpose of providing safe, supportive, and independent living environments for vulnerable groups and drive positive changes in service delivery. Hence the need for members of the RSP to be drawn from such diverse backgrounds so that a broad variety of experience, knowledge, skills and insights can be accessed so that good practice identified and reported upon.

### **Role of the Scrutiny Panel:**

- To take an independent, residents view of the organisations performance
- To collect and critically evaluate evidence on the agreed service areas under review
- To provide ideas and recommendations for the organisations to shape and improve services, including sharing good practice between the combined trusts
- To work in partnership with staff and trustees to implement the scrutiny panel's recommendations to improve services

**Our aim is to ensure:**

- Our recommendations are fair and deliverable
- We treat residents equitably and follow a transparent process
- That the RSP learns from our first project and continually improve

**We hope the outcome of the RSP's work will help:**

- improve TSM satisfaction
- improve visibility and accessibility of complaints including addressing vulnerability issues
- Ensure establishment of a positive complaints culture
- improve awareness and communication of complaints

**Introduction – Why choose complaints?**



The RSP chose complaints as their first scrutiny project as complaint handling was the lowest scoring measure in the Tenant Satisfaction Measures 2023/24 for some of the providers, unusually 100% for HPLC.

TSM	Lench's 2023	SJMT	YGT	BCOP	SCHA 2023	HPLC	Comparison with all small providers
TP09-Satisfaction	56%	N/A	N/A	21%	36%	100%	58%

with the landlord's approach to handling complaints							
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We also knew the Panel could add a resident's perspective to the complaints process and with the wider complaints service.

Complaints is a subject which residents feel strongly about, so if we can identify any strengths, highlight any improvements we can make together with NYC that should then benefit wider tenants and increase satisfaction.

Additionally, in light of the recent changes by government to regulate complaints by the Regulator of Social Housing and the Housing Ombudsman, the complaints service seemed the highest priority scrutiny area.

This report summarises our approach, what we found, our recommendations and what we would like to happen next to share this report with each Providers Trustee's.

### Regulatory Requirements

The Regulator of Social Housing (RSH) is the government body responsible for setting, monitoring and regulating consumer standards for social housing in England. One of the many RSH requirements that landlords **must** report on and have **a duty to act** upon tenant satisfaction feedback.

The Tenant Satisfaction Measures (TSM's) are a helpful perception survey used by all providers to test performance every 2 years.

### The Housing Ombudsman Service

In the year ending March 2025, the Housing Ombudsman investigated 6,380 complaints, an increase of over 470% compared to 1,111 in 2020, with property condition being the most frequent cause for complaints - a worrying significant increase over previous years.

Though this figure encompasses all social housing complaints the sheltered housing sector represents a significant proportion of this number. The precise 2025 figures for sheltered housing complaints is difficult to determine and isn't specified accurately by the Ombudsman. Notwithstanding this, the overall trend shows a sharp rise in investigations, driven by issues such as repairs and, more recently, antisocial behavior and safeguarding concerns.

Complaint handling was the second most complained-about area, making up 20% of complaints. Meanwhile, measures of resident satisfaction have been reported to be at the

lowest levels in years and incidentally the levels of dissatisfaction with the outcome of complaints/resolution processes registered by the Press have skyrocketed.

Whilst, the number of complaints successfully handled by each of the "combined trusts" has remained reassuringly low (typically < 30 p.a.). There is some evidence that within the combined trusts the number of complaints received is still slowly rising and from our face-to-face interviews there is evidence that tenant satisfaction is still high and perhaps is a lot higher than the annual satisfaction surveys indicate.

Housing complaints are historically difficult to resolve due to a combination of complex issues including, significant actual or perceived power imbalances between landlords and tenants, a lack of awareness of rights, and systemic challenges such as inadequate resources for landlords and fragmented resolution processes. Complaints are often an emotive subject which residents feel strongly about and from the trusts point of view are often difficult to resolve in a timely and cost effective fashion whilst still retaining an amicable relationship with the customer and other stakeholders. Historically, the complaints/resolution process is still largely viewed as an antagonistic and confrontational process, and conducted accordingly. It is obvious that such a pervasive attitude is unhelpful and may even be counterproductive.

The "combined trusts" recognise this and part of the scrutiny panel's job is to identify "problems" and suggest potential solutions. Any stigma overshadowing the complaints/resolution process should be minimised and steps taken to ensure that a well-run, fit-for-purpose, person-centered service is produced. Ultimately, any changes to complaints/resolution process should be considered a potential learning opportunity that drives a positive local complaints handling culture which would enhance local service provision.

With the proper approach, residents' complaints can be resolved peacefully. A clear comprehension of the problem, active listening, and solution-finding are necessary for resolving the issue effectively. Effective complaint handling involves clear communication, consistency, fairness in approach, and adherence to the Ombudsman's Complaint Handling Code.

The Housing Ombudsman's recently published Corporate Strategy document (2025-2030) a desire has been outlined of a "**vision for healthier homes and fairer services**" with a "**trusting relationships between landlords and their tenant**" and a mission set of "**improving landlord's services and residents lives through housing complaints**". The Ombudsman's stated strategic objective is to generate a code for complaints handling/resolution that "**provides an excellent person-centered service**" that "**drives a positive local complaints handling culture**" and with their stated willingness "to extend our powers and engage with partners to support closing gaps in redress".

### **Why effective Complaint Handling Matters?**

Handling residents' complaints is an integral part of providing excellent customer service. By listening empathetically to residents, taking responsibility in sorting the problem, by apologising or offering more appropriate solutions, following up, and learning from complaints, disputes can be resolved fairly and maintain good resident/contractor/landlord relationships. By implementing these tips, businesses can turn disgruntled residents into loyal advocates and improve the landlord's reputation.

Effectively handling tenant complaints is essential for building positive relationships between management and residents and promote smooth management of the properties. When tenant concerns are taken seriously and addressed promptly, it prevents conflicts, keeps good tenants, and maintains high occupancy. Tenants who feel acknowledged and see their issues resolved quickly are more likely to renew leases, reducing costly turnover and vacancy rates.

Timely complaint handling also prevents minor issues like leaks, pests, or maintenance problems from escalating into bigger, more expensive repairs. Being proactive protects the overall condition of the property and ensures a safer, more comfortable environment for tenants. Furthermore, a reputation for fairness and responsiveness in dealing with tenant complaints helps property managers attract reliable, long-term tenants.

Beyond avoiding disputes, managing tenant complaints well brings long-term benefits. It improves tenant relationships, encourages open communication, and builds trust, making tenants more likely to report problems early and cooperate with property rules. It also reduces legal risks, ensures compliance with local housing laws, and strengthens your credibility as a responsible property manager. In the long run, clear complaint procedures and professional handling lead to smoother property operations, fewer recurring problems, and a strong reputation in the rental market.

### **3. Our scope**

1.1 The Resident Scrutiny Panel (RSP) decided to scrutinise the complaints journey and satisfaction for residents for the following reasons:

- In the recent Tenant Satisfaction Measures, Complaints had one of the lowest satisfaction outcomes
- The panel acknowledges that the complaints process service is an integral service for residents and would like to know if there are any improvements/recommendations that can be made
- Look at the complaints policy and process and see if they are visible, accessible and correct or if improvements can be made
- To understand the customer experiences of the process

1.2 This document sets out the proposed scope of the complaints scrutiny.

## 2. Key Objectives

- Ensure a positive complaints culture in each of the organisations
- To improve the customer experience with complaints
- To improve the level of satisfaction with Complaints (and improved TSM satisfaction)
- Improve transparency, visibility and accessibility of complaints (inc vulnerability)
- Improved awareness and communication of complaints
- To work collaboratively across the 6 partner organisations and to learn from others and share experiences

## 3. Out of scope

The following areas are out of scope for this review:

- Recommendations that directly contradict the Housing Ombudsman's Complaints Handling Code.

## 4. Approach

The review will cover the following key elements:

- **Fact Finding:** reviewing service standards, policies, procedures and performance information, quality, and resident's views relating to the service, mystery shopping.
- **Challenge and Compare:** examining what other landlords do and try to identify good practice.
- **Recommendations:** analysing findings and making recommendations to the Trustees of each organisation and asking the key contacts at each partner organisation to produce an action plan demonstrating how our recommendations will be addressed.
- **Monitor and evaluate:** once we have an action plan, the Panel will monitor progress and evaluate outcomes for residents.

## 5. The Review Stages

The stages of the review are set out below-

### Stage 1: Planning and Preparation – May/June

- Document review exercise
- Development of an agreed scoping document

### Stage 2: Gathering the evidence and reality checks -July/August

For this review the main scrutiny activities could include;

- Reviewing of documents and performance data including TSM's
- Review of the policy and procedure
- Presentation & interview with the relevant Managers
- Interviews with relevant staff
- Benchmarking against similar sized housing providers
- Conversations with the panel members and residents that have recently been through the complaints process.
- Using coffee mornings to gather wider resident views

### Stage 3: Review of evidence gathered - Sept/Oct

- Collation of all results and evidence gathered
- Draft report developed identifying positive practice and recommendations for the service

### Stage 4: Final Report Drafted – Sept/Oct

- Final report drafted by the Panel
- Review of draft report with the relevant managers for comment and feedback
- Final report to the Trustees for comment and approval

## 4. The Task and Finish Approach

The RSP quickly realised the size and scale of the project and decided to share the tasks out into task and finish groups with residents choosing a group that really played to their skills, experience and strengths and assigning a lead for each group. The task and finish groups are:

- Document review and performance and benchmarking
- Customer Experience
- Website review
- Culture and Communications
- Report writing

The table below sets out the individual tasks for each group: -

<b>Task and Finish Group</b>	<b>Action</b>	<b>Tasks</b>	<b>Panel Members</b>
Document Review and Performance and Benchmarking	Check current Complaints policy / procedure is compliant against code and is easily understood from a resident lens.	Read complaints handling code and policy and advise on compliance.	Eileen Sandra, Jonathan, Margaret Stevens, Maggie (Auntie)
	Review Annual Complaints Performance Reports	Read and ensure it meets the HOS requirements and is shared to wider tenants.	
	Compare policy to best performing associations	Identify best performing associations. Compare policies and advise as to possible areas of improvement	
	Performance Review	Review TSM's and wider performance statistics in respect of numbers of complaints acknowledged and responded to within agreed timescales.	
Culture and Communications	Review any newsletters content on complaints	Review content and ensure that sufficient transparency and honesty in terms of satisfaction, trends, learning.	Chrissie, Val, Pat, Maggie, Pauline, Lynn, Barbara, Janice, Margaret W, Raymond and Diane

	Panel members to interview staff involved in receiving, processing, investigating and responding to complaints	Draft set of questions and circulate to team for agreement	
Website Review	Review HOS website and look at who is cited as best practice	Highlight strengths and how this could be applied	Matt, Sam and Bob
Customer Experience	Website mystery shopping	Log a complaint via the website and advise on ease of use, accessibility issues and experience generally	Cherry, Val, Betty, Vera, Cathy G, Jeanette, Chris, Maggie, Pat D, Barbara and Pat C.
	Hear from customers that have lived experience.	Talk to former complainants or carry out survey with wider customers.	

Website Review	Compare and contrast against complaints areas of other associations websites	Review a number of other housing association websites to identify areas of potential improvement in terms of customer interface, ease of use, accessibility, etc.	
	Review RSH website and who has been awarded C1 in recent inspections.	What can be learnt in respect of complaints from C1 landlords.	
Culture and Communications	Review sample of anonymised stage 1 and stage 2 responses from last 12 months.	Review through a tenant lens, are they clear, answer the complaint, provide sufficient redress, empathetic and learning.	
Report Writing	Review sample reports from other Scrutiny Panels using YDC document library.	Gather data from each Task and Finish Lead and produce report under sections following the scope.	Phil, Don and Bob

Our methods will be fairly straight forward and will involve a deep dive into the documents including the complaints policies and annual reports. We have considered the following questions...

- Can we easily find the relevant policy documents and can they be easily understood.
- can we use them- How easy is it? How speedy was it? How is the complainant kept informed and involved?
- Review process of complaint logging and how well are complaints monitored from the initiation through to close.
- can the process work in a mystery shopper testing?

Interview of relevant management and front line staff.

- what was their experience? what was their attitude to the complaints process. Did they feel confident in handling complaints and did they feel supported during the proceedings.

Is there evidence of a culture of engagement with complainants and a "learning from complaints" environment.

- do interviews and documentation provide evidence of ongoing training in corporate literature etc and evidence of a culture of positive engagement of staff with complaints process?

## **6. The timetable**

### **Stage 1. (April/mid-May 2025).**

#### **Planning and preparation.**

- Agreeing the subject and scope
- establishment of task and finish groups and allocation of group tasks
- Development of methods to be used
- identify and source material to be reviewed

### **Stage 2: Gathering evidence and fact checking (Late-May- August 2025).**

- Reviewing of documents and data
- Reviewing of the policy and procedure

- Interviews with relevant staff
- Benchmarking against similar sized Housing Associations
- Interviews with new potential residents and recent complainants (gathering evidence of personal experiences of their journey when they made a complaint).

**Stage 3. Review of gathered evidence (August -Sept 2025).**

- Collation of all results and evidence gathered
- Draft report developed to identify positive and best practices and make any recommendations for service improvement

**Stage 4. Final Report drafted and agreed. (Late sept to October 2025).**

- Final report drafted and shared with the CEO's of the "combined Trusts"
- Presentation to the individual Board of Trustees

**7. Findings**

**Document Review**

Generally, the RSP found that each Provider's complaints policy are compliant with the Housing Ombudsman's Complaint Handling Code and the Regulator of Social Housing's Consumer standards in relation to complaints.

Each policy is resident-centered and equitable and puts the residents needs first. The policies are:

- designed to get things right first time
- designed to ensure residents are kept informed and are in the loop all the time and ensure the landlords deliver on their promises
- complaints seem to be viewed by the landlord as a learning opportunity and is used to improve service delivery

The panel were pleased that a written copy of the complaints policy is included in all tenancy starter packs and is discussed during tenant induction. But the RSP felt there was a need for the complaints policy to have been emphasised a bit more during the induction interviews.

In most face-to-face interviews with new residents the RSP found that the new residents were often unsure of the policy and procedures around making complaints (in fact, in several instances the residents stated that as they left the induction meeting they were completely unaware of the fact that a complaints policy existed). This is probably because the information

was "lost" in the blur of activity that goes on around moving in time and a lot of important information goes over the head of the new resident. **We would recommend that scheme managers have a second a follow up session 2-3 months' post moving in is held to ensure new residents are really clear on how to complain and what the difference is between a service request and a formal complaint.**

The Panel was pleased to find that each organisation provided a concise and clear definition of a complaint. Again, we also found easy links to descriptions of individual complaint policies. We were also pleased with the provision of explanations of how to access the complaints procedure and found once accessed it was relatively easy to follow.

We would urge management to ensure that **hard copies** of any relevant documentation are readily available from scheme staff or a placed in the "libraries" or other communal areas where all residents can easily access if they choose not to or can't access information digitally. We would also recommend advertisement of the **availability of web-based system** to ensure that those who would prefer to use a desktop based system or assure that those residents who would prefer that their complaints to be handled more privately can be easily accommodated. **It is essential that the complaints procedure is accessible to all.**

However, one problem that the RSP recognised was while it was understood there was a clear and essential need to satisfy the Ombudsman's and the Regulators requirements, it should not be overlooked that there is also a need to satisfy residents requirements. This was often not met. If the residents cannot follow the policy, they will not use it and this could result in some of the more vulnerable residents "living with a problem" rather than reporting it and getting it sorted.

In face-to face interviews, residents often told us that they were put off submitting a complaint because instructions were found to be too long and complicated (frequent quotes from residents included phrases like *"it was too hard to follow"*, *"it's too complicated"* and on one memorable occasion *"losing the will to live as they tried to make sense of the policy put me off" being one of the more extreme reactions !!*).

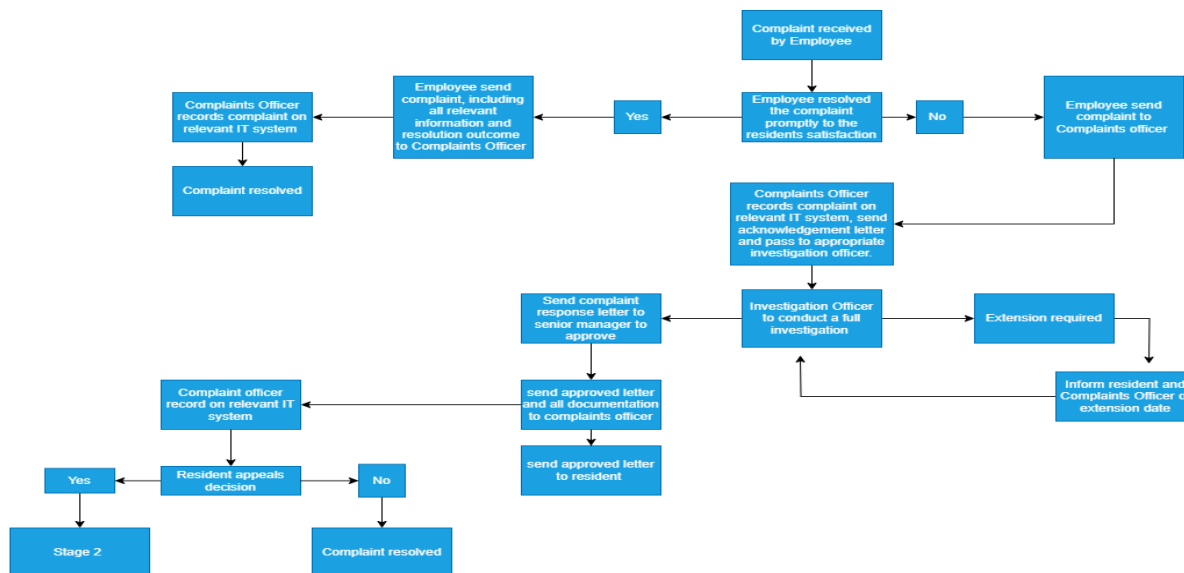
It was generally thought most documents would be easier to understand if they were written in more straight forward language and availability of a simpler version of the code would be of great benefit to our more vulnerable residents. This is important because the majority of residents of the "combined trusts" fall into the vulnerable elderly category (with a proportion experiencing memory difficulties and/or other mental health problems and/or physical difficulties is increasing).

An added factor is that the proportion of our residents for whom English is not their first language is also rising and any potential communication issues need addressing.

The RSP was particularly impressed with the "*Complaints, Comments, Compliments: Policy & Procedure*" document (Pub Sept 2024) produced by HPLC is an example of good practice and really does provide a user friendly and usable explanation of the complaints policy.

[Compliments-Complaints-Policy-Procedure.pdf](#)

The RSP was impressed with "*Complaints & Compliments: Policy & Procedure*" document (May 2024) by Lench's Trust for both its **clear and plain language** and we particularly liked the **diagrams depicting the flow through the complaints process** (on pages 8 and 9) and following the "a picture paints a thousand words principle" the diagrams really are an aid to some residents understanding of the how any complaint will be considered and advanced through the system.



The panel were satisfied that the Self-assessments against the Housing Ombudsman's Complaint Handling Code have been completed and published on each organisations website. The RSP found that from the residents point of view they could be easier to find. We also felt that in most circumstances the value of these submissions were of questionable value since they had a tick-box feel about them and were actually just communicating what the Ombudsman *needed/wanted* to see/hear knowing that they would not be checked in any detail and play scant attention to the actual real world realities.

Therefore, the RSP feel that when completing the self-assessment, we would encourage the trusts to complete these with residents in partnership to ensure that it is a true reflection of the state of play in complaint handling service. By taking this approach, landlords can demonstrate to regulators that residents have actually been consulted and are content with the landlord's assessment of service delivery.

Perhaps of more value to residents were the annual complaints performance and service improvement reports that have started appearing on most of the trust's websites in the last year or so. Each of these documents contained useful information on the actual number, brief description of the circumstances and eventual outcome. The RSP found that these documents (whilst a requirement of the Ombudsman) provided useful and helpful information to residents **but** again these documents could be easier find. We would recommend that these documents are more widely distributed in prominent positions at each of the schemes and residents receive a copy and are encouraged to comment on them at resident's meetings as a matter of course. These documents are effective signifiers of best practice and **deserve to be better advertised**.

We also felt that their visual element was also a good way to communicate outcomes to residents. The RSP were particularly impressed with documents produced by the Sir Josiah Mason trust and Yardley Great trust and these should be regarded as examples of good practice.

[Complaints Report 2024 2025](#)

[YGT Complaints Report 2023 2024](#)

## **Website**

This task and finish group found some best practice in terms of style and language from the following websites:

We noted that SJMT and YGT need to review their wording on the websites in relation to informal complaints that the Ombudsman frowns upon:

## **How to resolve your concerns or problems informally**

Where possible, we encourage you to raise concerns directly with the staff members involved in the service you or someone you represent is accessing. They will aim to resolve this within 5 working days.

When a resident complains or expresses dissatisfaction with a landlord's service, there is a question as to whether they must always be logged as a complaint and responded to at stage one, even if the landlord is able to take immediate action to resolve the issue. This question is raised by many landlords when the code was first published in 2020 because it was silent on the issue, which suggested that expressions of dissatisfaction should always be taken through a landlord's 'formal' internal complaints process. Many landlords were concerned by this approach and pointed out that they routinely resolved a large number of minor issues quickly and to a resident's satisfaction, without engaging the formal complaints procedure. They

argued that to require all such matters to be responded to at stage one would cause unnecessary administration for landlords and would disadvantage residents, who simply wanted the problem to be resolved quickly.

The code emphasises that: “The early and local resolution of issues between landlords and residents is key to effective complaint handling’ (section 5.2) and the latest version (April 2024) also includes this helpful additional sentence: ‘Whenever a resident expresses dissatisfaction landlords must give them the choice to make (a) complaint” (section 1.3).

So, landlords can try to resolve an issue early, without logging a formal complaint, on three conditions:

1. The complainant must agree to the early resolution; it must be their choice. If they insist on a formal complaint being logged and responded to, the landlord should do so
2. A record should be made of the decision to resolve the matter informally, so that there is an audit trail if the decision is disputed later on
3. The early or informal resolution should not form an extra initial ‘stage’ in the formal complaints procedure. This is made clear in section 5.2 of the code: “It is not appropriate to have extra named stages (such as ‘stage 0’ or ‘informal complaint’) as this causes unnecessary confusion.”

In practice, many landlords use some form of ‘early resolution’ process to successfully resolve many issues promptly. A variety of terms are used by landlords for this work, such as a ‘service recovery process’, ‘escalation process’, ‘urgent enquiries’ etc While these may be useful internally, landlords should avoid using them more widely, as they have may confuse residents and the Ombudsman.

Landlords need to be careful that any such processes do not become standard complaint ‘stages’ that are routinely followed without the resident’s agreement. Any decision to attempt ‘early resolution’ should not be taken on a resident’s behalf and, if early resolution is pursued, it should be done so swiftly and given priority. Overall, effective early resolution work should be welcomed, so long as the above conditions are met, as it is customer-focused and reduces unnecessary delays and administration.

## **Culture and Communication**

This task and finish group spent time talking to the complaints leads at each of the partners and used a set of questions to guide their conversation.

### **RSP Complaints Scrutiny – Template / Script and Questions for Complaints staff**

1) how do you respond to a complaint being made?:- (when a resident contacts to report a complaint by phone, in person and on line, how/where do you begin. Talk us through the process and timescales.)

(notes - staff should answer call giving their names and showing empathy, apologising, really listening and showing they care, giving confidence to customer, clear on timescales and what will happen next)

2) what details do you take down from a resident/? Does this differ depending on the method chosen to report the complaint? Do call handlers have a script they follow?

3) How do most complainants raise their dissatisfaction? (phone, in person or on line?)

4) Is it routinely asked how the situation has/ or is impacting the complainant?

5) what are the steps taken to resolve a complaint and do you make sure that resident is aware of the steps/what they can expect?

6) Do you get back in touch with the residents regarding the complaint throughout their complaint? Is there any face to face contact? Do you communicate enough?

7) how long on average does it take to get back to the resident?

8) Do you ask the complainants what they are looking for in terms of a resolution?

9) What training do you have / is in place to equip staff who receive complaints, manage complaints and respond to complaints?

10) What would you like to change in the complaints service?

11) What are you proud of?

12) Is there anything else you would like to make the Scrutiny Panel aware of? Or is there anyone else you think we should meet with?

Many thanks for your time and honesty.

The Panel would recommend that the Complaints Lead should meet regularly with residents to explain any changes to their organisations approach to complaints and ensure the scheme managers drive home the message that a *resident does not need to formally say "I am complaining" to make a complaint and that clear expressions of dissatisfaction will be treated as a complaint* and "a complaint can be made to **any** member of the frontline staff" and makes it clear " the responsibility lies with a named staff member not the resident to progress any complaint " is placed in a prominent place in the policy documentation.

Section 3.2 of the updated code says: "Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord." This puts the emphasis on landlords to make sure that all staff – not just those directly involved in handling complaints – have the knowledge to correctly identify complaints and ensure they are registered and managed through the appropriate process. Complaint teams can become dumping grounds for 'non-complaints' if colleagues are not properly trained to distinguish service requests from actual complaints, taking resources away from dealing with the more serious issues. Similarly, landlords not properly differentiating between the two can deny residents access to the formal complaints procedure and delay finding a resolution to the issues raised.

Again the RSP found that the chain of responsibility could usually be quite easily worked out and once this was established it was relatively easy to follow the progress of complaints through the system but the RSP feels that the **person responsible for investigating and progressing the complaint should be explicitly stated and agreed with the complainant as rapidly as possible as the complaint is being progressed.**

The Panel were satisfied that the decisions of complaints process were usually communicated to residents in a timely and effective fashion. But, as mentioned above, we found that some of our vulnerable residents found these letters to be a bit "wordy" and were perceived to be hard to follow, especially at a glance, and following the "a **picture paints a thousand words principle**" a more diagrammatic visual method of representing the stages of the decision process and this may be a clearer way to help or residents to navigate through the steps.

The panel felt that a **regular scheduled** opportunity for residents to meet with on site management to discuss complaints is essential. It was felt by the RSP that setting up "*a have your say*" forum that invites resident " *to tell us your views* " would be helpful. Some of the trusts already schedule these meetings but that these happen universally across the "combined trusts" is unclear. An example, of good practice it should be noted at Lench's Trust monthly resident's meetings with the site manager have become a norm and it is possible to effectively address issues in this forum. The introduction of the quarterly senior management meetings where the CEO and his senior management team (Chief housing, financial and maintenance officers) meet with residents to share information, discuss plans and most importantly address complaints has proven to be very popular with the residents and should be considered to be an example of best practice and we would urge other members of the "combined trusts" to consider introducing something similar.

The RSP would also recommend that it is made clear to residents that a complaint has been recognised and being investigated formally. The RSP has been informed by more than one residents that

although the resident had thought they had made a complaint , in fact their "complaint" was being treated as a "simple service request" or an informal complaint and not been logged as a formal complaint by the housing provider with the result that problems were left unresolved for far too long.

In fact, the RSP felt at times the individual trusts often adopted a **defensive** attitude and tried to persuade a resident that their problem was perhaps of lesser urgency/importance than it deserved and could be considered as informal. This raised concerns that all expressions of dissatisfaction are not routinely logged. Making sure formal complaints are logged accurately ensures transparency and promotes accountability and encourages positive resident engagement.

The RSP believe that **Open Communication is key:** Maintaining clear and consistent communication is one of the most effective ways to reduce tenant complaints. Keep tenants informed about property policies, updates, upcoming repairs, or changes in rent terms etc. Providing multiple ways for tenants to contact you and responding promptly to their concerns builds trust and encourages a positive landlord-tenant relationship.

**Fair & Consistent Policies:** Consistent enforcement of property rules and fair handling of tenant complaints fosters a sense of security and fairness among tenants. Apply policies equally to all tenants to avoid disputes and accusations of favoritism. Following local tenancy laws and regulations while maintaining fairness helps create a balanced, respectful rental environment.

## **Culture**

The RSP is convinced that **good staff training is essential** for successful complaint handlings and a positive complaints culture. Whilst it is clear that training is a key part of each trusts culture and it is made clear by their statements on the websites that each of the "combined trusts" aspire to effective staff development. Whilst it was clear that ongoing staff development was occurring it was hard for the RSP to determine how effective this was and we would ask in our follow up work whether each trust provide more evidence of the effectiveness of their training regimes and whether a complaints friendly culture had really come normal.

In fact, in its face to face interviews we felt that there was often still an initially defensive or antagonistic response to complaints and that some members of staff did not feel empowered enough to take charge of the problem and simply passed it on up the chain with all the associated problems that come with such behaviour. This needs to be followed up and the Panel recommend **XX**.

The Panel would like to urge the Complaints lead from each Trust to make sure any changes made to their policies satisfy the following :

- help residents easily distinguish between a concern, a simple service request and a situation where a complaint is necessary

- increase residents understanding of the complaints process and give reasonable expectation of timeframes involved for resolution and explain how complaints can be resolved productively and amicably.
- do the residents know who to approach to make a complaint and do our residents know who is accountable for the progression and reporting a complaint
- make the process of making a complaint simpler and easier for our residents to use
- streamline the customer journey through the complaints process
- make it clear to our residents when it is appropriate to escalate things if matters cannot be solved locally and how to involve The Housing Ombudsman and manage the resident's expectations of this external body.
- minimise any actual or perceived stigma surrounding the making of a complaint (are the interests of vulnerable residents protected?) Care should be taken that potential effects of all nine protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation) have been considered.
- Improve transparency, visibility and accessibility of the complaints process
- encourage resident's engagement with the complaints procedure
- Foster a culture where a complaint is welcomed and is treated as a learning opportunity
- Promote continuous staff training and career development so that the importance of the complaints/resolution procedure is highlighted.
- Develop a culture where complaint resolution is seen as a key part of the way of driving improvements in service provision.

The RSP would like to see five-step process being considered as a new procedure for handling customer complaints that effectively place emphasis on **empathy, taking responsibility**, and actually promotes quick and **lasting resolution**.

- Listen and empathize with the customer to understand their concerns.
- Apologize and take responsibility for the issue.
- Offer a solution that **works for** the resident to address the problem.
- Follow up with the resident to ensure the problem **has** been sorted.
- make sure the organisation **has learnt** from the complaint to make sure it does not happen again to improve future service delivery.

# Tips for Handling Customer Complaints



## Performance and Benchmarking

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Ref SCHA “what people are saying” page on the website – extend to complaints? Good practice and lovely use of case studies and quotes.

[What People Are Saying - Solihull Care Housing Association Ltd](#)

## Customer Experience

### Survey results

As we weren’t able to talk to any previous complainants, we developed a survey. We had a total of 35 responses to the following questions:-

### Resident Scrutiny Panel – Residents survey

Hello there, I am part of the Residents Scrutiny Panel and you may have read that we are looking at complaints for our first scrutiny project. We really want to help make things better for residents and to help our project, we would really love to hear from you on your thoughts about complaints.

We have some questions for you and it should only take a few minutes of your time to complete but that it's really important that your voices help to make improvements to the complaints service and really influence change.

If you would like to add more information, please do so on the back of this sheet.

Please hand your completed survey back to your scheme Manager or to a member of the Resident Scrutiny Panel in your scheme. You don't have to share your personal details, but if you would like a response to the survey, please add your name, address and contact details at the bottom of the survey.

Thank you very much.

*The Resident Scrutiny Panel*

- 1) Would you know how to make a formal complaint to your landlord? (please circle)

YES/NO

- 2) If YES, how would you complain? (in person, over the phone, via the website, email etc)

.....

- 3) Did you know that there is lots of information about complaints on the website?

YES/NO

- 4) Have you ever had to make a formal complaint?

YES/NO

- 5) If so, please can you tell us a little bit more about what you liked and disliked about the process?

(think about how easy was it to complain? Did you feel really listened to? Did anyone come out to see you? Did you feel trust and confidence with your landlord resolving your complaint?)

.....  
.....  
.....  
.....

6) Is there anything you would improve? (Please state)

.....

7) Is there anything else you would like to share with the Panel?

.....  
.....  
.....  
.....

Thank you so much for your time, it is really appreciated. Look out for our report on the website in a few weeks' time.

Name:.....

Address:.....

Tel:.....

Email:.....

**Conversations with Residents on the Panel**

Scrutiny Panel members shared their concerns in relation to complaints from their experiences and from insight gathered from their locality.

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## **Recommendations**

The Panel have created a table (appendix 1) to clearly set out their recommendations captured during this scrutiny project and look forward to hearing the response from each partner.

## **Next steps**

The Panel would like to thank all the residents involved with this project and all the staff supporting this scrutiny project, their hard work and generosity with their time is much appreciated.

We would welcome the opportunity to present our report and recommendations to the individual Board of Trustees December 2025 onwards.