



Hull Churches
Housing Association

Complaints Handling

Self-Assessment and
Improvement Plan
for Hull Churches
Housing Association
2024 – 2025





Foreword

The Social Housing (Regulation) Act 2023 places a legal duty on the Housing Ombudsman to monitor social housing landlords' compliance with the Complaints Handling Code. To exercise this duty, the Housing Ombudsman requires the Association to produce an annual complaint handling performance and service improvement report which must include:

- An annual self-assessment against the code's standards
- A qualitative and quantitative analysis of the Association's complaints handling performance
- Service improvements resulting from learning from complaints
- Any other relevant reports or publications produced by the Housing Ombudsman in relation to the work of the Association

This report sets out HCHA's complaints handling performance between 1st April 2024 to 31st March 2025.

Whilst dealt with on a "case by case" basis, our complaints log and learning practices provide insight in where things are not working as they should and where changes to service delivery might be needed or beneficial.

Of note is the required shift in service requests prioritisation because of Awaab's law, and the impact this is likely to have on the need to set clear expectations with tenants from the onset to avoid cause for complaints.

We continue to improve our complaints handling processes, and in line with last year's improvement plan, delivered training to all staff. Other areas of focus included the importance of adequate and accurate record keeping, and exploring how learning from complaints, and compliments, can best be shared with all.



Findings

Compared to last year, we saw an increase in complaints received. However, this increase is nowhere near in line with national figures, stating a 474% rise in complaints about repairs services.

We believe that the rise in numbers we noted is mainly due to increased attention on tenants' rights and landlord responsibilities through national advertising campaigns, direct advertising by so-called claims management organisations (e.g. cold calling and social media).

We also believe that the relatively small increase, in comparison to national figures, reflects the significant amount of work done by our dedicated staff as part of the implementation of the new Complaint's Handling Code and revised policy and procedures.

We too have taken implementation of the new code as an opportunity to remind tenants of our responsibilities as a social landlord and their responsibility to report concerns and repairs in a timely fashion.

Keeping tenants informed; warning them of risks associated with claims management companies, reminding them of our formal comments, compliments and complaints processes, continuous staff training, and effective and efficient communication by frontline staff, all allow for timely identification of issues and responsive action, thus avoiding disproportionate escalation.

Throughout the last year, we unfortunately also noted an increase in complaints stemming from irrational expectations to rectify unsubstantiated concerns, i.e., due to hallucinations, delusions or paranoia.

Whereas we handle *all* complaints in accordance with code provision 5.10 through to 5.15, where we "make reasonable adjustments for residents where appropriate under the Equality Act 2010", the unfounded and often vexatious nature of these complaints means resolutions are not easily found and often paired with withdrawal or lack of availability from previously involved specialist mental health support services. Proving disproportionately demanding, staff find they are not adequately resourced or equipped and concerned about the impact on quality of the tenancy services provision to all.

OUR COMPLAINTS IN NUMBERS

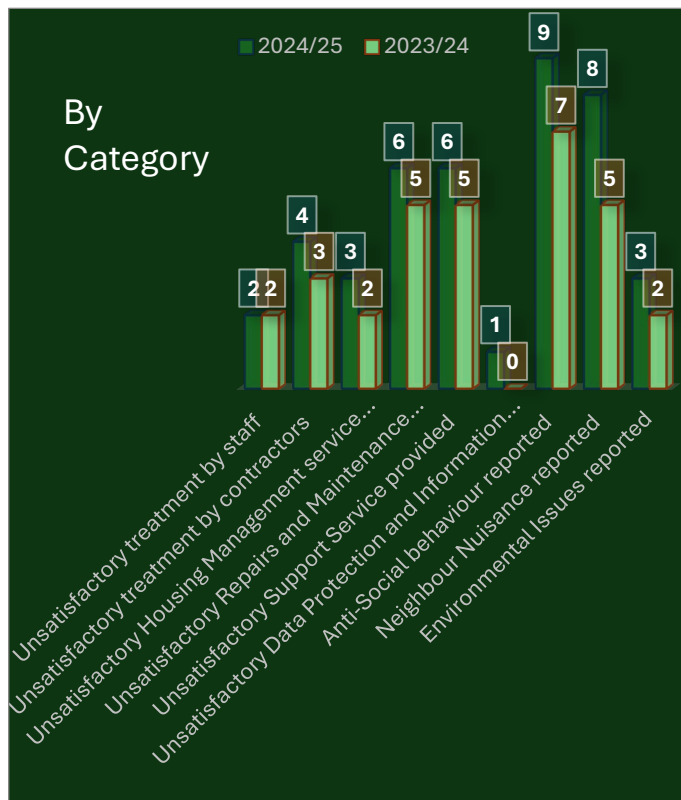
	2024/25	2023/24
Stage 1 Complaints Received	15	6
Complaints extended in agreement with client	0%	0%
Stage 1 complaints handled within timescale	100%	100%
Stage 2 Complaints Received	1	0
Complaints extended in agreement with client	0%	0%

TENANT SURVEY MEASURES (TP09)

	2024/25	2023/24
Proportion of respondents who report making a complaint in the last 12 months who are satisfied with their landlord's approach to complaints handling	45%	73%
	TENANCY SATISFACTION MEASURES (2024) ¹	(ACUITY BENCHMARKING REPORT 2022)

MANAGEMENT INFORMATION MEASURES

	2024/25	2023/24
CH01 (1) Number of stage 1 complaints relative to the size of the Association	15 for 494 properties	6 for 491 properties
CH01 (2) Number of stage 2 complaints received per 1,000 homes	0.5	0
CH02 (1) Proportion of stage 1 complaints responded to within Complaint Handling Code timescales	100%	100%
CH02 (1) Proportion of stage 2 complaints responded to within Complaint Handling Code timescales	100%	100%



¹ See also Key Focus Areas (page 7)



Performance

COMPLAINTS MADE BUT NOT ACCEPTED

It is possible that a complaint made is not actually a complaint but is a request for a service. An example might be “my garden fence is broken”. The difference is clearly set out in our complaints handling policy and procedures, stating that only an expression of dissatisfaction with a service would be managed as a complaint. The fault needs to have been previously reported, and we had not responded, or the client was not satisfied with our response.

There are other occasions where a complaint may be made but not accepted. These related to where there is a formal process in place for “right to review” or “appeal”. We will ensure these routes are pursued before a complaint is recorded.

0 requests for service were reported through our complaints handling procedure since June 2024.

TYPES OF COMPLAINTS REFUSED

HCHA’s Compliments, Comments and Complaints Policy also sets out the exclusion criteria for complaints which may be refused.

We provide a copy of the Compliments, Comments and Complaints Policy to tenants when a stage 1 complaint is acknowledged.

If a complaint is not accepted, the tenant will be given an explanation setting out the reasons why.

0 complaints were refused since June 2024

ESCALATION

In this period, 1 case escalated to stage two and was not upheld, as no failure of service was identified during stage 2 investigation.

No complaints were investigated or subject to judgement by the Housing Ombudsman or the Local Government & Social Care Ombudsman.

COMPENSATION PAYMENTS

Over this period, a total of £646.13 in compensation was paid across stage one complaints only. The breakdown of the compensation with comments are as below:

Stage 1 Complaints		Stage 2 Complaints
Apology and £75 shopping voucher	In acknowledgment of failure to provide appropriate support to a vulnerable tenant following their reporting of Anti-Social behaviours in the neighbourhood.	Not applicable
£571.13 in recharges and rent arrears	In acknowledgment of failure to provide appropriate advice during tenancy visit and not actioning reports of damp and cold in line with policy and procedures. The tenant vacated the property before this could be rectified	

WHAT WE DID LAST YEAR

Below sets out steps the Association has made in 2023/24 to make improvements because of learning from complaints.



Improved transparency for all tenants – we included more performance data and learning from complaints in ‘you said, we did’ sections in tenant bulletins and on our website.



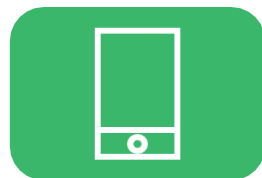
Increased awareness amongst tenants of the various ways to complain – We published informative articles in newsletters, standard letters and satisfaction surveys, including on how to make a complaint, and the role of the Housing Ombudsman.



We added ways in which to gather feedback on our complaints handling process rather than outcomes – We have started carrying out transactional satisfaction surveys following closure of any complaints.



We improved staff awareness and understanding by making training on the Complaints Handling Code and Best Practice compulsory for all staff.



We recruited an in-house General Maintenance Operative who has a big role to play in tenant engagement and setting realistic expectations for responsive repairs.

By focusing on these areas, we can continue to provide essential services while adapting to new challenges and opportunities.

OUR KEY FOCUS AREAS AND IMPROVEMENT PLAN FOR 2024/25

Impact of Awaab's Law on Tenants' Expectations

Where common themes are identified these become part of a wider piece of work with the service delivery teams or across the organisation to implement remedial actions.

We have summarised these as:

- Tightening of contract management processes and to work with existing and new, responsive and planned maintenance contractors on a one-ethos approach to complaints handling
- Embracing every opportunity to set out and emphasise expectations for tenants, staff and third parties on e.g., repair response times and the need for accurate record keeping
- Reiterate these messages, in all client-facing documentation, as appropriate, and through additional information published on our website.

Evidencing through Record Keeping and information sharing

Identified increase in Mental Health Support Needs

- Implement complaints handling “deep dives”: to monitor services where the prevalence of activity and resources needed are significantly higher, with the aim of additional learning and identifying underlying reasons and possible actions for improvement
- Add further categorisation to our complaints management system to aid continuous analysis and learning
- We acknowledge that our satisfaction rating for complaints and ASB handling may be based on outcomes rather than procedure. Whereas transactional surveys for complaints do appear to be more positive, the 43% customer satisfaction result of the TSM survey indicates that tenants' perception of the difference needs to be further addressed.

Self-Assessment

Code provision	Code requirement	Comply: Yes / No
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a tenant or group of tenants.'</i>	Yes
1.3	A tenant does not have to use the word 'complaint' for it to be treated as such. Whenever a tenant expresses dissatisfaction landlords must give them the choice to make a complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a tenant to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes
1.5	A complaint must be raised when the tenant expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the tenant complains.	Yes
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how tenants can complain.	Yes
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint, they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to tenants. Acceptable exclusions include: • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy.	Yes

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the tenant becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes
2.4	If a landlord decides not to accept a complaint, an explanation must be provided to the tenant setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes
3.1	Landlords must make it easy for tenants to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of tenants who may need to access the complaints process.	Yes
3.2	Tenants 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.	Yes
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that tenants are unable to complain.	Yes
3.4	Landlords must make their complaint policy available in a clear and accessible format for all tenants. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes
3.6	Landlords must give tenants the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes
3.7	Landlords must provide tenants with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes

4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Tenants must not be treated differently if they complain.	Yes
5.2	The early and local resolution of issues between landlords and tenants is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two-stage complaints process set out in this Code. Tenants must not be expected to go through two complaints processes.	Yes
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the tenant is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the tenant must be asked for clarification.	Yes
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind b. give the tenant a fair chance to set out their position c. take measures to address any actual or perceived conflict of interest, and d. consider all relevant information and evidence carefully.	Yes

5.10	Landlords must make reasonable adjustments for tenants where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a tenant has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the tenant, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from tenants and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the tenant is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the tenant.	Yes

6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within 5 working days of the complaint being received.	Yes
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	Yes
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the tenant of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the tenant.	Yes
6.5	When an organisation informs a tenant about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes
6.6	A complaint response must be provided to the tenant when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the tenant.	Yes
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes
6.8	Where tenants raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related, and the stage 1 response has not yet been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes
6.9	Landlords must confirm the following in writing to the tenant at the completion of stage 1 in clear, plain language: • the complaint stage • the complaint definition • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Yes

6.10	If all or part of the complaint is not resolved to the tenant's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within 5 working days of the escalation request being received.	Yes
6.12	Tenants must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a tenant remains unhappy as part of its stage 2 response.	Yes
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days of the complaint being acknowledged.</u>	Yes
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the tenant of the expected timescale for response. Any extension must be no more than <u>20 working days</u> without good reason, and the reason(s) must be clearly explained to the tenant	Yes
6.16	When an organisation informs a tenant about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes
6.17	A complaint response must be provided to the tenant when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the tenant.	Yes

6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes
6.19	Landlords must confirm the following in writing to the tenant at the completion of stage 2 in clear, plain language: • the complaint stage • the complaint definition	Yes

	• the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising • Acknowledging where things have gone wrong • Providing an explanation, assistance or reasons • Taking action if there has been delay • Reconsidering or changing a decision • Amending a record or adding a correction or addendum • Providing a financial remedy • Changing policies, procedures or practices.	Yes
7.2	Any remedy offered must reflect the impact on the tenant as a result of any fault identified.	Yes
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the tenant where appropriate. Any remedy proposed must be followed through to completion.	Yes
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes

8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: • the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. • 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 • any findings of non-compliance with this Code by the Ombudsman • the service improvements made as a result of the learning from complaints • any annual report about the landlord's performance from the Ombudsman; and • any other relevant reports or publications produced by the Ombudsman in	Yes
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	relation to the work of the landlord.	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes
8.4	Landlords may be asked to review and update the self- assessment following an Ombudsman investigation.	Yes
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to tenants who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as tenants' panels, staff and relevant committees.	Yes
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes

9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: • regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance • regular reviews of issues and trends arising from complaint handling • regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings • annual complaints performance and service improvement report	Yes
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: • have a collaborative and cooperative approach towards resolving complaints • working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints, rather than blaming others act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes



GOVERNING BODY'S RESPONSE TO THIS REPORT

The Board is content with the Association's results of self-assessment of compliance with the Housing Ombudsman's complaints handling code.

We note with confidence - yet without complacency - the current position, observing that at the time of this self-assessment the Association faces a comparatively small number of complaints cases compared to national figures, and no Housing Ombudsman orders for redress.

The Board would like to express its gratitude to the team and acknowledges that it is due to the hard work and input of staff at the front line that all complaints are dealt with in an effective and efficient manner and thus escalation is kept in check.

The Board also acknowledges the benefits of our small size, allowing us to offer a personable complaint handling approach through a single point of ownership of the process and individual accountability of officers.

Regarding the improvement plan, the Board fully supports proposed actions to distinguish between customer satisfaction results of the 2-yearly TSM survey - likely to result from satisfaction with the *outcomes* rather than the actual complaints handling *process* - and the results of case-by-case transactional surveys.

The Board also welcomes further categorisation of our complaints management system to aid continuous analysis and learning.