

Key Decision Required:	Yes	In the Forward Plan:	Yes
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CABINET

25 SEPTEMBER 2026

REPORT OF THE PORTFOLIO HOLDER FOR HOUSING AND PLANNING

A.2 ANNUAL HOUSING COMPLAINTS PERFORMANCE AND SERVICE IMPROVEMENT REPORT INCLUDING SELF-ASSESSMENT AGAINST THE HOUSING OMBUDSMAN'S COMPLAINT HANDLING CODE

PART 1 – KEY INFORMATION

PURPOSE OF THE REPORT

To present to Cabinet the Annual Housing Complaints Performance and Service Improvement Report for scrutiny and challenge, which includes a self-assessment carried out against the Housing Ombudsman's Complaint Handling Code for 2025/26 prior to publication and submission.

EXECUTIVE SUMMARY

This report presents Cabinet with the Council's Annual Housing Complaints Performance and Service Improvement Report for 2025/26, including the required self-assessment against the Housing Ombudsman's statutory Complaint Handling Code. Cabinet is asked to scrutinise and challenge the report and self-assessment, provide its formal response, and approve publication and submission to the Housing Ombudsman by 30 September 2026.

The Code provides the statutory framework for effective, fair and accessible complaint handling by social landlords. It requires landlords to learn from complaints, demonstrate service improvement, and provide assurance through annual reporting, self-assessment, governing body oversight and publication.

The Council has updated its housing complaints arrangements in response to changes to the Code, including the adoption of a stand-alone Housing Complaints Policy and, in 2025, a harmonised Corporate and Housing Complaints Policy to reflect the more closely aligned complaint handling codes of the Housing Ombudsman and the Local Government and Social Care Ombudsman. The Portfolio Holder for Housing and Planning acts as the Member Responsible for Complaints and provides ongoing scrutiny through regular reviews of complaint performance, trends and learning.

Housing complaints increased in 2025/26 compared with 2024/25, continuing the upward trend seen in the previous year. The service received 84 Stage 1 complaints, of which 18 escalated to Stage 2. Housing repairs accounted for 55% of both Stage 1 (comprising 46) and Stage 2 (comprising 10) complaints, while tenancy matters accounted for 33% of Stage 1 (comprising 28) complaints and 39% of Stage 2 (comprising 7) complaints. Tenant satisfaction with complaint handling, as measured through the annual tenant perception survey, fell to 36.3%, compared with 49% in the previous year.

The Annual Report identifies service improvements arising from complaint learning and confirms that the self-assessment and performance information have been reviewed by the Member Responsible for Complaints. Complaint information has also been

considered through the Council's Housing Improvement Board and Tenant Panel, supporting regular challenge, assurance and a continued focus on improving outcomes for residents.

The report also highlights amendments to the Council's Tenant Satisfaction Measures return for 2025/26. Following Cabinet approval and submission to the Regulator of Social Housing in June 2026, subsequent queries resulted in amendments to TSM RP02 and corrections to CH01 and CH02. The amended figures have been accepted by the Regulator.

RECOMMENDATION(S)

That Cabinet:

- (a) in accordance with the Housing Ombudsman's Complaint Handling Code and in compliance with Cabinet's scrutiny and oversight requirements, receives the Council's Annual Complaints Performance and Service Improvement Report, which includes the Annual Self-assessment against the Code, as set out in Appendices A and B;**
- (b) subject to (a) formally provides its response to the Annual Complaints Performance and Service Improvement report, for publication;**
- (c) authorises officers to publish both the Report and the Cabinet's response on the Council's website within the section relating to complaints and to submit the self-assessment to the Housing Ombudsman by 30 September 2026; and,**
- (d) Notes the amended figures for the annual Tenant Satisfaction Measures return as set out in the body of this report.**

REASON(S) FOR THE RECOMMENDATION(S)

To approve the self-assessment carried out and to provide a response before its submission to the Housing Ombudsman.

ALTERNATIVE OPTIONS CONSIDERED

The Council's complaints handling self-assessment sets out how it complies with the Housing Ombudsman's Complaint Handling Code and the evidence to support this position. The only alternative option would be to not complete this assessment.

The Social Housing (Regulation) Act 2023 places a duty on the Housing Ombudsman to monitor compliance with its statutory Complaint Handling Code. This means that the Housing Ombudsman is required to ensure that all landlords meet the standards set out in the Code for complaint handling. To assist with this, all landlords are required to submit their self-assessment to the Housing Ombudsman by 30 September 2026,

If this was to not be completed or submitted, the Council would risk non-compliance with the Complaint Handling Code

Where the Housing Ombudsman identifies any concerns with a landlord's compliance with the Code, they will engage with them to bring them back into compliance promptly. If there is evidence of ongoing failures in compliance, the Ombudsman will consider using their wider powers including Complaint Handling Failure Orders (CHFO). The

Ombudsman Self-Assessment Guidance states a landlord's failure to provide their submission may be issued with a Type 3 CHFO (non-compliance with the statutory Complaint Handling Code).

In June, the Housing Ombudsman wrote to the Council to highlight some areas of the Corporate and Housing Complaints Policy that could be revised in order to more closely align with the requirements of the Complaints Handling Code. Amendments to the policy have been drafted and shared with the Ombudsman for confirmation that they meet its requirements.

PART 2 – IMPLICATIONS OF THE DECISION

DELIVERING PRIORITIES

The operation of an effective complaints policy and procedure contributes to the Corporate Plan 2024-28 themes of Pride in our Area and Services to Residents and of Financial Sustainability and Openness.

OUTCOME OF CONSULTATION AND ENGAGEMENT

Consultation and engagement has been undertaken with members of the Council's Tenant Panel. A sub-group focussing on complaints and TSMs has been presented with and discussed a draft of the annual report and self-assessment. Their feedback has been considered when preparing the final draft of those documents. Their feedback is summarised below:

- Annual reports and future documents should be produced in an easy-read format.
- Reports should be made more engaging through the use of images, potentially including Tenant Panel members.
- Tenants supported publishing full complaints information to help residents understand Council performance.
- The report should clearly explain that there were 84 individual complaints, not 102, because Stage 2 complaints are escalations of existing Stage 1 complaints.
- More detailed analysis of complaint trends should be included, such as:
 - seasonal patterns;
 - recurring issues at particular times of year;
 - themes such as repairs, heating and other common issues.
 - Service-area detail should be expanded, particularly in relation to repairs
- The report should clearly show:
 - what the Council has learned from complaints;
 - what improvements have been made as a result.
 - Additional complaint-handling training may be beneficial.
 - The report should reassure tenants that the Council will support them throughout the complaints process.

- A dedicated complaints team could help improve consistency and the overall customer experience.

The main Tenant Panel was also presented with the complaint statistics at their meeting on 8 September 2026 and had an opportunity to discuss them with the Council's member responsible for complaints.

The sub-group has, during the course of the year, reviewed samples of complaints and discussed whether appropriate conclusions were reached. They have also provided their thoughts and insights into some of the Council's processes, such as when requesting repairs and the satisfaction they have experienced with that process.

We will continue to regularly engage with members of our Tenant Panel to review performance statistics relating to complaints and their views on how our services can be improved.

LEGAL REQUIREMENTS (including legislation & constitutional powers)

Is the recommendation a Key Decision (see the criteria stated here)	Yes	If Yes, indicate which by which criteria it is a Key Decision	X Significant effect on two or more wards ☐ Involves £100,000 expenditure/income ☐ Is otherwise significant for the service budget
		And when was the proposed decision published in the Notice of forthcoming decisions for the Council (must be 28 days at the latest prior to the meeting date)	23 April 2026

The Social Housing (Regulation) Act 2023 placed a duty on the Housing Ombudsman to monitor compliance with the statutory Complaint Handling Code ("the Code"). This means that the Housing Ombudsman is required to ensure that all landlords meet the standards set out in the Code for complaint handling, regardless of their size and operating model.

The legal duty placed on the Ombudsman to monitor compliance with the Code, is regardless of whether it receives individual complaints from residents about a landlord.

Landlords must assess against the Code and assure policies and practices comply with the Code at least annually and submit this to the Housing Ombudsman. The self-assessment must form part of the Council's Annual Complaint Performance and Service Improvement Report. Landlords may wish to include wider scrutiny arrangements such as using a tenant panel to review its self-assessment or complaints policy to satisfy itself that its complaints function is operating with the Code.

The Housing Ombudsman Service has provided self-assessment guidance. The self-assessment must be provided to the Housing Ombudsman using the dedicated electronic form, which asks landlords to provide electronic links to key information and documentation required to support their submission, these include:

- The self-assessment as published on the website
- The annual complaints performance and service improvement report
- The governing bodies response to the report
- The complaints policy

For the purposes of complying with the self-assessment process Cabinet is the governing body and is required to provide a response to the report.

Failure to comply with the Code may result in Type 3 Complaint Handling Failure Orders (CHFOs) being issued. A Type 3a may be issued where a landlord fails to provide their annual submission form to demonstrate compliance in scrutiny and oversight of the complaints handling process. A Type 3b CHFO may be issued where the Ombudsman has found that there is non-compliance with the Complaint Handling Code with respect to policy or in handling complaints in practice.

The Code Compliance Framework (“the Framework”) sets out how the Ombudsman will assess whether a landlord has effectively scrutinised itself, whether its complaints policy complies with the Code, and whether it complies with the Code of Practice.

The Framework states that the Ombudsman will assess compliance with the Code in three areas, and the requirements in all three areas must be met:

- Compliance in Scrutiny and Oversight
- Compliance in Policy
- Compliance in Practice

Under the area of Compliance in Scrutiny and Oversight, the landlord must have:

- a) Produced an Annual Complaints Performance and Service Improvement Report, for submission to the governing body, which must include:
 - the annual self-assessment against the 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 the Code by the Ombudsman;
 - the service improvements made as a result of the learning from complaints;
 - its actions following any annual report about the landlord’s performance from the Ombudsman; and
 - its actions following any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
- b) That the annual complaints performance and service improvement report has been 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.

These are Code provisions 8.1 and 8.2.

Under the area of Compliance in Policy, the landlord’s complaints policy must meet the expectations of the Code contained in all other provisions.

Under the area of Compliance in Practice, the landlord’s complaints handling must meet the expectations of the Code in practice. This assessment is based on an assessment of the landlord’s own reported performance, data and insights from the Ombudsman’s casework and information from external data sources.

X	The Monitoring Officer confirms they have been made aware of the above and any additional comments from them are below:
Comments from the Deputy Monitoring Officer: This report sets out the Council's completed self-assessment process and Cabinet should be satisfied that the completion of the self assessment is more than solely a compliance exercise. It is an opportunity for assurance around the complaint handling arrangements and their effectiveness. The self assessment should itself support the Best Value principle of continuous improvement. Both the Member Responsible for Complaints and Cabinet (as the governing body for the Council's social housing landlord role) must rigorously scrutinise and challenge the self-assessment to ensure it presents a fair and accurate picture of the service. Resident feedback is vital in understanding the lived experience and ensure that the Council is listening to its residential tenants and leaseholders. Cabinet must respond to the submission of the self assessment and this should cover how the self assessment was reviewed, scrutinised and challenged, what risks or weaknesses have been identified, and what actions are to be taken to address them. It should highlight lessons learned from complaints, how complaint data has informed decision-making, and how improvements will be embedded and monitored. Complaints are a source of insight to improve outcomes for tenants etc and strengthen the Council's performance. From the above review of the self assessment, any areas where it is considered there is a non-compliance with the Ombudsman's Code of Complaint Handling, these should be highlighted.	
FINANCE AND OTHER RESOURCE IMPLICATIONS	
There are no significant financial implications associated with this self-assessment and performance report as it confirms existing arrangements which are currently funded via existing budgets in the Housing Revenue Account However, it is anticipated that the implementation of the revised Complaints Handling Code and the actions required to meet these will have a financial impact in the longer term.	
X	The Section 151 Officer confirms they have been made aware of the above and any additional comments from them are below:
Although there are no direct financial implications arising from the report, it is however recognised that complaint outcomes, Ombudsman findings, tenant satisfaction data or identified service improvements, resource implications etc. may have an impact on the HRA Business Plan. Such issues therefore need to be considered on an on-going basis as part of the Council's wider service planning and budget-setting processes. This is particularly relevant in areas such as repairs and maintenance, complaint handling capacity, officer training, data review and analysis along with the wider impacts continuing to emerge from the new era of Social Housing Regulation.	
USE OF RESOURCES AND VALUE FOR MONEY	
The following are submitted in respect of the indicated use of resources and value for money indicators:	

A) Financial sustainability: how the body plans and manages its resources to ensure it can continue to deliver its services;	The Council has an adopted Financial Strategy.
B) Governance: how the body ensures that it makes informed decisions and properly manages its risks,	The Council has a mature constitutional structure and framework of policy for decision-making.
.C) Improving economy, efficiency and effectiveness: how the body uses information about its costs and performance to improve the way it manages and delivers its services.	The Council has an adopted Financial Strategy.
MILESTONES AND DELIVERY	
If Cabinet agrees to the self-assessment, noting any comments or feedback it wishes to make in connection with this, it will then be submitted to the Housing Ombudsman by 30 September 2026 and published on the Council's website. The Council will continue to engage with members of the Tenant Panel in respect of the improvements outlined in the annual report and the Council's general performance in respect of complaint handling.	
ASSOCIATED RISKS AND MITIGATION	
The Housing Ombudsman believes that all members should comply with all provisions in the Code as this represents best practice in complaint handling. The Social Housing (Regulation) Act also placed a duty on the Ombudsman to monitor compliance with their code. Where a landlord does not meet the requirements of the Code in any areas and does not move into compliance within a reasonable timescale, the Ombudsman will issue a Complaint Handling Failure Order and publish this. There are three types of Complaint Handling Failure Orders: Type 1: A CHFO may be issued in relation to failings in an individual case where the Ombudsman has taken reasonable steps to seek engagement from a landlord, but the resident remains unable to progress a complaint through the landlord's process. Type 2: A CHFO may also be issued on an individual case where the landlord has failed to provide information, either at the outset of the investigation or to confirm compliance with our orders, to the Ombudsman as requested. Type 3: A CHFO may be issued where a landlord fails to comply with its membership obligations under paragraph 9 of the Scheme. In addition to this, the Housing Ombudsman has powers to carry out wider investigation where there is evidence of a 'systemic failing' and where this is found to be the case, it will be referred to the Regulator of Social Housing. This could trigger the Regulator using its enforcement powers which include requiring a registered provider to submit a performance improvement plan or to take particular actions set out in an enforcement notice. The Regulator will also be able to authorise an appropriate person to enter a social housing premises to take emergency remedial action and issue penalties or require the housing provider to pay compensation.	
EQUALITY IMPLICATIONS	

In line with the Public Sector Equality Duty, within these policies the Council has due regard to the need to eliminate discrimination, harassment, victimisation, to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not.

SOCIAL VALUE CONSIDERATIONS

Creates healthier, safer and more resilient communities: To build stronger and deeper partnership working arrangements whilst continuing to engage and empower tenants.

IMPLICATIONS FOR THE COUNCIL'S AIM TO BE NET ZERO BY 2050

The operation of the Corporate and Housing Complaints Policy and associated self-assessment does not present a direct impact on the Council's target for net zero greenhouse gas emissions from its business operations by 2050. The Council will be mindful of energy efficiency measures, wherever relevant, in the implementation of its policies.

OTHER RELEVANT CONSIDERATIONS OR IMPLICATIONS

Consideration has been given to the implications of the proposed decision in respect of the following and any significant issues are set out below.

Crime and Disorder	The Annual Housing Complaints Performance and Service Improvement Report, including the required self-assessment does not directly relate to crime and disorder considerations.
Health Inequalities	The Corporate and Housing Complaints Policy, upon which the self-assessment is based, and supporting Reasonable Adjustments Policy and Vulnerability Policy ensures equal access to the Council's housing services.
Subsidy Control (the requirements of the Subsidy Control Act 2022 and the related Statutory Guidance).	The Council will follow subsidy control legislation and regulations, where applicable, in relation to the content and implementation of these policies.
Area or Ward affected.	All

PART 3 – SUPPORTING INFORMATION

BACKGROUND

The Council has retained its housing stock and currently manages over 3,000 homes as well as more than 400 leasehold properties and 389 garages.

In July 2020, the Housing Ombudsman published a new Complaint Handling Code providing a framework for high-quality complaint handling and greater consistency across landlord's procedures. Its aim was to enable landlords to resolve complaints raised by their residents quickly and to use the learning from complaints to drive service improvements.

This was followed in November 2020 by the Social Housing White Paper which committed to improve the national regulatory system for social housing to make landlords more accountable and to improve the formal national ombudsman complaint system.

This White Paper also included a 'Charter for Social Housing Tenants' and this contains seven commitments that social housing tenants should expect from their landlord, one of which was to have their complaints dealt with promptly and fairly.

The subsequent Social Housing (Regulation) Act 2023 introduced new social housing consumer standards that contain specific expectations registered providers of social housing must comply with and detail the outcomes that providers are expected to achieve.

In relation to complaints, the Transparency, Influence and Accountability Standard states that:

- Registered providers must ensure their approach to handling complaints is simple, accessible and publicised.
- Registered providers must provide accessible information to tenants about:
 - a) how tenants can make a complaint about their registered provider;
 - b) the registered provider's complaints policy and complaints handling process;
 - c) what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled; and
 - d) the type of complaints received and how they have learnt from complaints to continuously improve services

The Housing Ombudsman Service provides redress for individual tenant complaints. However, its Complaints Handling Code became statutory from 1st April 2024 and provides a single, robust set of standards for complaints procedures to be accessible, fair and efficient. A legal duty is also placed on the Ombudsman to monitor compliance with the Code, regardless of whether it receives individual complaints from residents about a landlord.

Following consultation, a further revision of the Housing Ombudsman's Code came into force on 1 April 2024 and the Council's Housing Complaints Policy was amended to take account of these changes.

The revised Complaint Handling Code requires landlords to produce an annual complaints performance and service improvement report for scrutiny and challenge, which includes a self-assessment against the Code.

The Council welcomes complaints and actively encourages tenants and customers to express their dissatisfaction. All expressions of dissatisfaction represent a positive opportunity to gather intelligence and insight that will help to improve our service delivery.

Since the implementation of the Housing Ombudsman's Complaint Handling Code, there has been an increase in the number of housing complaints being recorded.

This is partly attributable to the adoption of the Housing Ombudsman's definition of a complaint and it being made easier for residents to complain by providing different

channels through which complaints can be made. There has also been a national publicity campaign to raise awareness amongst social housing tenants about how to make a complaint if they are dissatisfied with the service being provided by their landlord.

The analysis of complaints enables the Council to understand where things have gone wrong and to identify what can be done to stop this happening again. The service takes a positive approach to learning from both individual complaints as well as any trends in the type of complaints being received.

Since April 2024, the Portfolio Holder for Housing and Planning, who is also the Member Responsible for Complaints (MRC), has received a quarterly report on the volume, outcomes and trends of complaints being received and also reviews performance at the monthly meetings held with housing managers. This more formalised approach to reviewing issues, risks and trends is being implemented to support our revised complaint handling arrangements.

The MRC continues to challenge senior officers around how the service is run, with the expectation that tenants receive a high standard of service. He has also attended Tenant Panel meetings, including the sub-group focussing on complaints and TSMs in order to gain direct input and engagement with our tenants.

During the year a new online complaint reporting form has been introduced. This form captures all information about a complaint and the person making the complaint in one place. This is making recording and assignment of complaints easier.

The annual Housing Complaints and Service Improvement report, attached as Appendix A, includes a number of proposed service improvements:

- **Review of service resourcing** to increase capacity for effective complaint handling and support responses within required timescales.
- **Improve Stage 1 complaint responses** by introducing a monthly review of a sample of responses by Assistant Directors, with involvement from the Portfolio Holder for Housing & Planning.
- **Strengthen consideration of redress** by ensuring Stage 1 responses include a thorough review of the case and clear consideration of what the complainant is seeking.
- **Improve identification and recording of complaints** so that all expressions of dissatisfaction are captured and responded to appropriately.
- **Use Housemark data analysis** to better understand complaint trends and support targeted service improvements.
- **Improve access to complaint information** through tenant newsletters, the annual report, website information and the new online complaint form.
- **Increase visibility of the complaints process** by displaying posters in sheltered housing schemes and communal areas of flats.
- **Improve support for tenants with vulnerabilities and diverse needs** by recognising individual needs, making appropriate adjustments and providing responses in accessible formats.

- **Gather better information on tenant vulnerabilities and diverse needs** through tenancy sign-up and the ongoing programme of tenancy check visits.
- **Provide further/ongoing officer training in 2026/27** on complaint handling, recognising dissatisfaction and supporting tenants with diverse needs.
- **Explore a dedicated housing complaints CRM system** to improve complaint tracking, reporting and data analysis in the future.

This report also includes a recommendation relating to amendments made to the Council's Tenant Satisfaction Measures return for 2025/26. The return was submitted to the Regulator of Social Housing in June 2026, following Cabinet's approval of the figures on 26 June 2026. Following queries raised by the Regulator, amendments have been made to TSM RP02. Officers also identified an error in the data provided for CH01 and CH02, which has now been corrected.

The updated / corrected figures are presented below:

Measure	Performance
RP02	
Proportion of:	
Non-emergency; and	73.4%
Emergency repairs completed within the landlord's target timescale	84.6%
CH01 - Complaints received per 1,000 homes:	
Stage 1	26.9
Stage 2	5.8
CH02 - Complaints responded to within Complaint Handling Code timescales	
Stage 1	95.2
Stage 2	83.3%

The amended figures have been accepted by the Regulator and the annual TSM return accepted.

BACKGROUND PAPERS AND PUBLISHED REFERENCE MATERIAL

None.

APPENDICES

Appendix A – Annual Housing Complaints Performance and Service Improvement Report for 2025/26

Appendix B - Self assessment against the Housing Ombudsman's Complaint Handling Code

REPORT CONTACT OFFICER(S)	
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