

ANNUAL COMPLAINT AND SERVICE
IMPROVEMENT REPORT

2024-25



Foreword and response from the Governing Body

The GreenSquareAccord Board reviewed the Annual Complaint and Service Improvement Report on 27th May 2025. As part of the Housing Ombudsman Complaint Handling Code, all social housing providers are required to publish an annual report of their complaints that details:

- ◆ a self-assessment against the Housing Ombudsman Complaint Handling Code
- ◆ a qualitative and quantitative analysis of complaint handling performance
- ◆ any findings of non-compliance with the Code by the Ombudsman
- ◆ the service improvements made as learning from complaints
- ◆ actions following any annual report about our performance from the Ombudsman or any other relevant reports or publications produced by the Ombudsman in relation to the work of GSA
- ◆ a response from the Governing Body

This report relates to the year 2024-2025. This was a significant year in which we made improvements to our complaint handling processes to meet the requirements of the updated Housing Ombudsman Complaint Handling Code. GSA was also subject to a special investigation by the Housing Ombudsman Service in 2024-2025.

The Board are encouraged to note further evidence of progress in our journey of improvement. For GSA, we are assured that the removal of the former 'Resolve' informal stage has improved clarity for our customers and ensured that expressions of dissatisfaction are appropriately captured and reported throughout complaint handling process. The introduction of the early-resolution team to handle less complex complaints quickly, has also been positive. The Board also note the improvement in Housing Ombudsman determination outcomes in 2024-2025, as compared to the previous year.

The Board note, however, that complaint volumes and escalations to Stage 2, and then the Ombudsman Service, remain high and this indicates there is more we can do to improve our customer experience and further address the root-cause issues relating to complaints and escalations. While the Board are assured of improvements made in relation to our complaint handling and learning culture, there is more we need to do to ensure we consistently work in line with our GSA behaviours, including keeping our promises and keeping customers up-to-date and communicating in a timely way. We recognise that this requires cultural commitment, not just process change and are encouraged to see early indicators of success in the current pilot aimed at improving our case tracking of actions following complaints.

Board Members recognise that there has been a continuous development of complaint reporting over the last two years which has meant we have much greater oversight of complaints information, HOS determinations outcomes and learning.

While we are assured that GSA have made the necessary changes to systems and processes meet the requirements of the revised Housing Ombudsman Code, we also note that there are times where our complaint performance, particularly in relation to Stage 1 complaints, has fallen below 100%. We have requested that we are open and transparent in our self-assessment document that, while systems and processes are in place, there are periods where the target has not been met. This will continue to have the necessary oversight, to ensure that required response timescales are consistently maintained.

In summary, the Board are assured of the improvements made in the year 2024-2025 but recognise that we still have further work to do. The Board will be robust in our challenge to the business and will continue to oversee performance and service improvements. Ensuring that we are a learning organisation which listens, and act upon our customers' feedback is a priority.



Colin Dennis
Chair

Executive Summary

We recognise that we are on a service improvement journey, and, through our Simpler, Stronger, Better Strategy, we are collectively working to improve customer outcomes, both in complaint handling and the underlying issues that lead to complaints.

Changing our complaints process in April 2024 has been effective in improving complaint handling for our customers and ensuring compliance with the Complaint Handling Code.

In October 2024, the Housing Ombudsman Service (HOS) published their Paragraph 49 review into GSA. We embraced the process fully as an opportunity to reflect on both where we had made improvements and where further work is still required. The process has helped us focus on key areas and expedite service improvements. Engagement with HOS was positive and monitoring arrangements were removed in February 2025 with HOS satisfied that we had delivered against their recommendations.

Due to the change in procedure, and removal of the former informal 'resolve' stage, we cannot accurately compare complaint volumes in 2024/25 with previous years. The data does, however, demonstrate that Stage 1 complaints remained consistently high throughout the year. There were 5132 Stage 1 complaints logged in 2024/25, with the highest number recorded in March 2025, at 597. On average, there were 428

complaints per month. We are confident however, that we are appropriately classifying any expressions of dissatisfaction as complaints, in line with the HOS Complaint Handling Code.

Escalations to Stage 2 (the second and final stage of the procedure) range between 14.95% and 31.61% per month, which is higher than we would like to see, and is an area of current focus.

Data and customer feedback tell us that, while we are making improvements in complaint handling, there is still more to do.

We remain absolutely committed to service improvements and this report details where we have made improvements and where further work is planned. Our commitment to openness, transparency and learning from complaints was noted in the report produced by the HOS Duty to Monitor team in November 2024, and this remains our focus and our commitment to GSA customers.

We are committed to reviewing equity of outcomes. In relation to complaints data in 2024-25, analysis indicates no significant variation in complaint volumes across customers with different protected characteristics. There are marginal decreases in complaints volumes for customers under the age of 30 and over 71.

Due to variances in reporting methodology, there may be slight variance in data reported in this report, as compared to our Tenant Satisfaction Measures.

Our self-assessment against the 2024 Code

[A copy of our self-assessment against the Code is published on our website.](#)

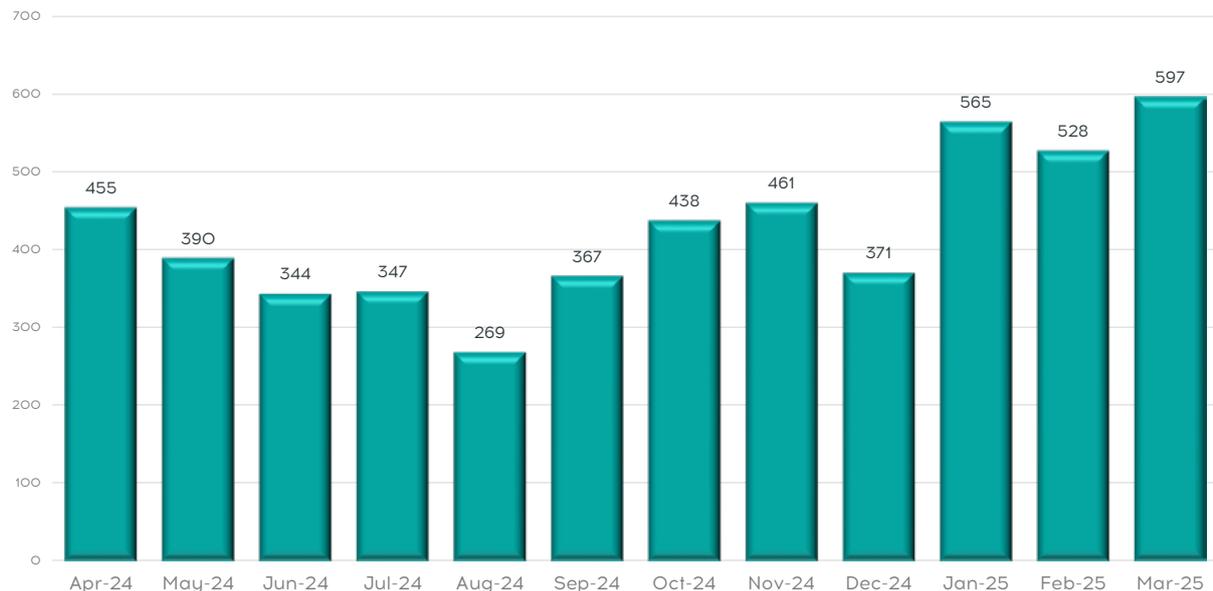
The self-assessment reflects the changes we had made to our complaints policy and procedure to ensure it aligns with the Code. It also reflects feedback from the HOS Duty to Monitor team following their review of the self-assessment submitted last year, and as detailed in their GSA Compliance Report. Following this review, we made changes to what information was included on the website, and how it is accessed, to improve ease of use for customers.

The Duty to Monitor team were positive about the changes we had made to our complaint processes while also noted the self-awareness and transparency shown in our 2023/24 annual complaint report and our commitment to learning from complaints.

All actions required following the Compliance report were completed in timescale.

Complaints data and analysis 2024-25

Stage 1 Complaint volumes:



Due to changes in the procedure, and the removal of the 'resolve' stage, we are not able to show complaint volumes as compared with last year.

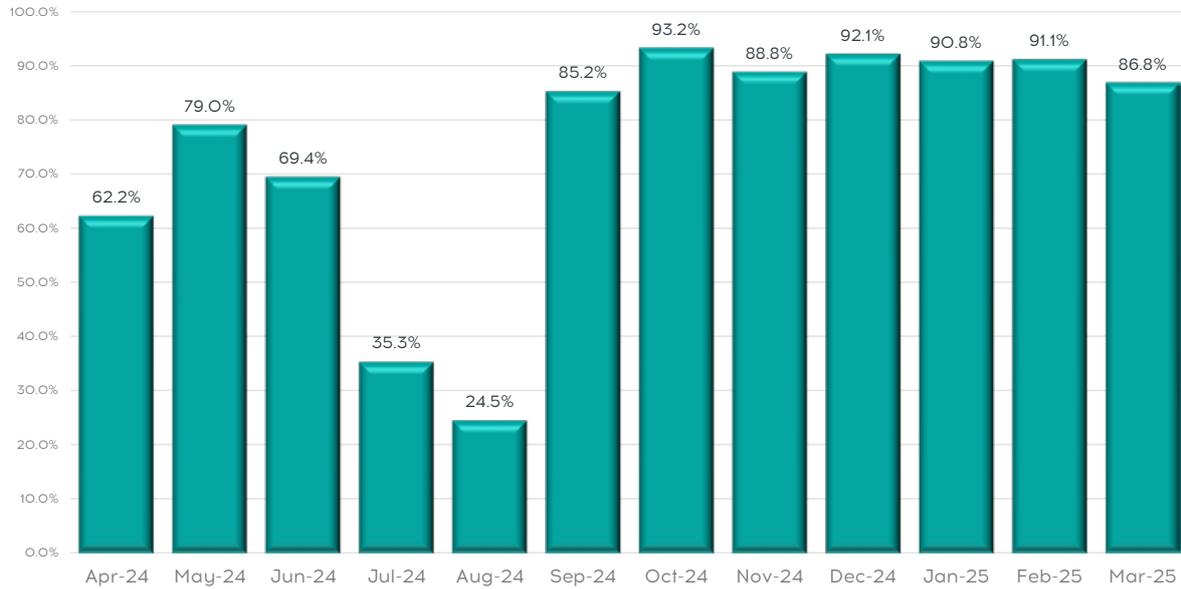
Stage 1 complaint volumes month on month, are shown in the graph.

There was a total of 5132 Stage 1 complaints logged in the year. The highest volume were recorded in March 2025 and the average number of Stage 1 complaints logged per month was 428.

Complaints we have not accepted in 2024-25.

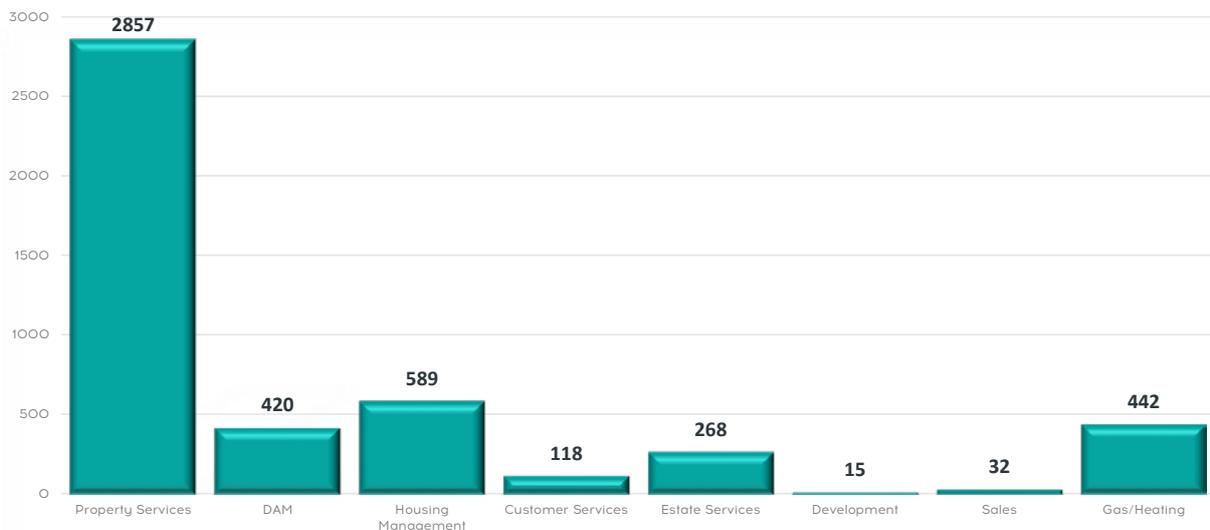
One complaint was deemed to be out of policy scope and the customer was signposted to HOS by Director of Customer Services in April 2024. Customer was requesting compensation for a boiler issue in July 2022. There was no evidence of an issue on our repair system, the member of staff the customer claims to have been communicating with had left GSA and the customer was unable to provide any evidence to support their claim therefore the complaint could not be investigated.

Proportion of Stage 1 complaints responded to within the Housing Ombudsman’s Complaint Handling Code timescales.



Non-compliance against code timescales is predominantly due to delays in acknowledgement, often when there are delays in complaints reaching the Customer Care team from elsewhere in the business. It is noted that there was a significant dip in Summer 2024, but measures put in place to address this and prevent recurrence have been effective in maintaining compliance over 85% for the rest of the year.

Stage 1 complaints by business area

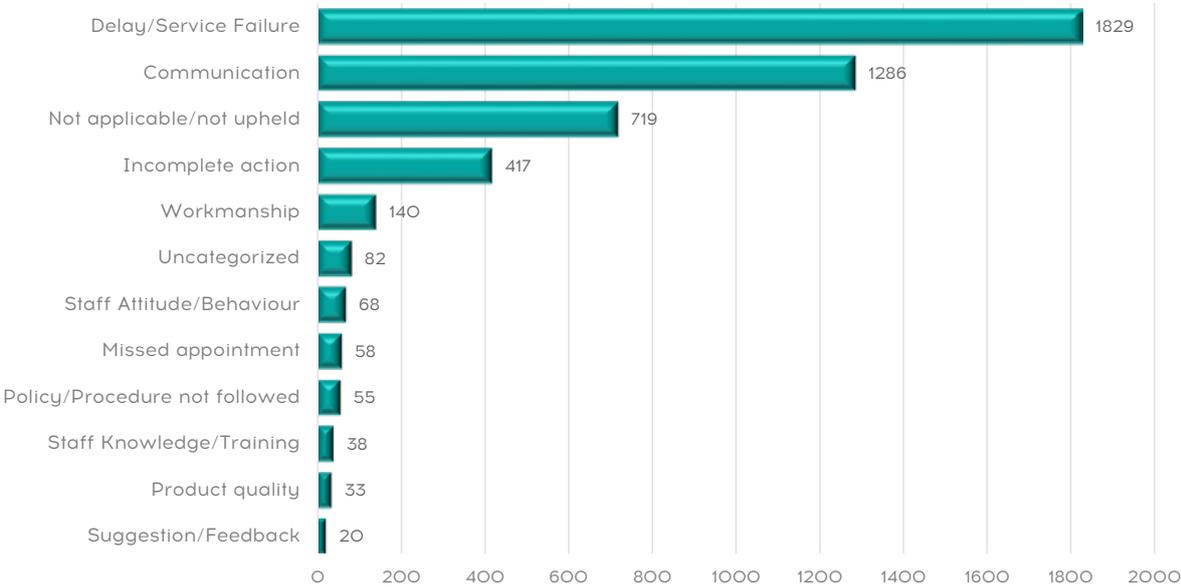


Complaints involving Property Services (repairs and assets) when added to damp and mould (DAM) and heating cases represents 3719 cases: 78% of the overall volume for the year. The biggest service improvement plans are being seen in this area to focus on the concern, changes which came into effect in April 2025 will see all Stage 1 complaint repairs post inspected to ensure customer satisfaction and resolution is improved. Focus also needs to be given to ensuring processes are improved the customer experience prior to complaints needing to be raised; this includes the consistency and clarity of customer communications, including keeping customers up to date.

The second highest area is Housing Management. During 2024/25, we have had a focus on improving our case management of ASB, made improvements in estates management services and have had a dedicated focus on service charge improvements. Working with the Customer Panel, this includes making improvements to how we communicate service charge uplifts.

*Please note Stage 1 complaints are assigned to business areas on conclusion, and therefore there is some variance in numbers as compared to the stage 1 complaint volumes chart.

Stage 1 Complaints by Underlying Root-Cause



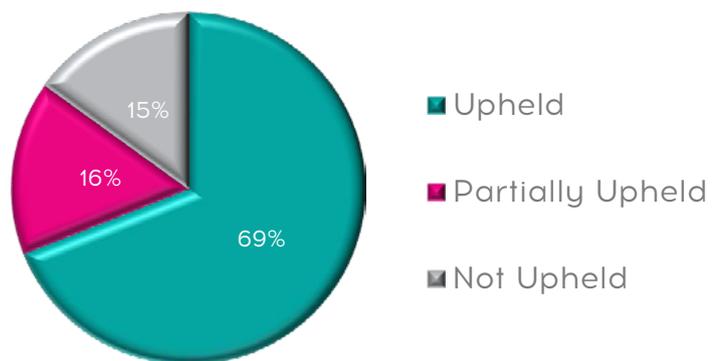
Delay continues to be the biggest cause for complaints, at 38% of the overall volume; this relates to issues across property services and a trend in not addressing issues at service request level, resulting in complaints being raised for customers to seek resolution.

Communication delays relate to customers not being updated or not being called back within our Customer Contact Standard. Related to Project synergy, further work is required as to how we ensure tasks are being allocated appropriately via the Housing Management system and how we improve monitoring of compliance with the Customer Contact Standard and to increase accountability.

*Please note Stage 1 root causes of complaints are assigned on conclusion, and therefore there is some variance in numbers as compared to the stage 1 complaint volumes chart.

Stage 1 Complaints by outcome

The year end position shows 69% of Stage 1 complaints being upheld, and this, together with partial and not upheld percentages is broadly representative of the month-on-month position.



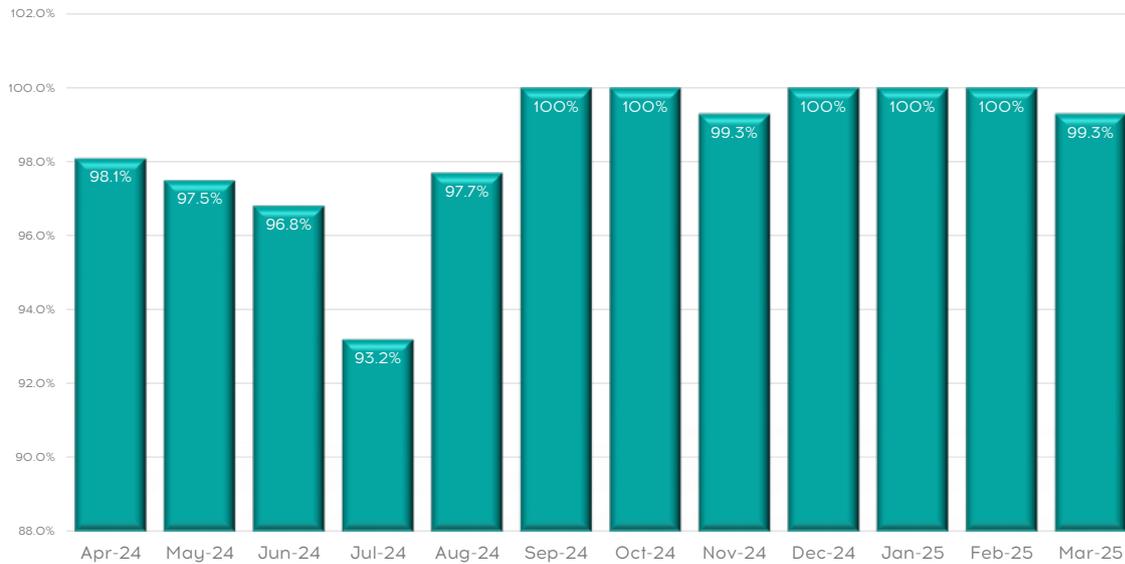
Stage 2 Complaints by volume (raised/resolved)



Overall, we have seen a trend of increased stage 2 complaints, with a peak of 165 in February 2025.

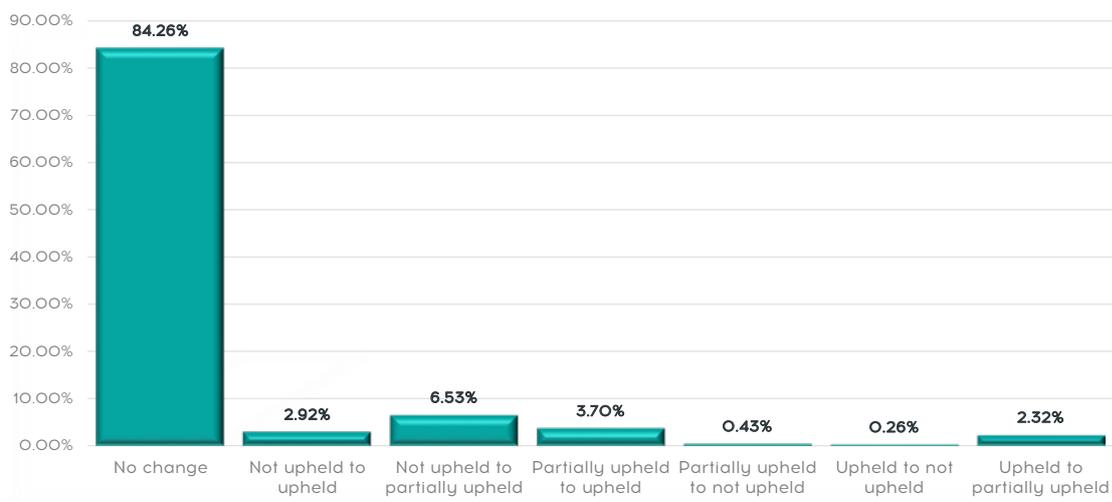
Cases closed in the month does not necessary match cases raised in the month as there is a frequent roll over of work in progress from one month to the next due to the timescale for Stage 2 responses.

Proportion of Stage 2 complaints responded to within the Housing Ombudsman’s Complaint Handling Code timescales.



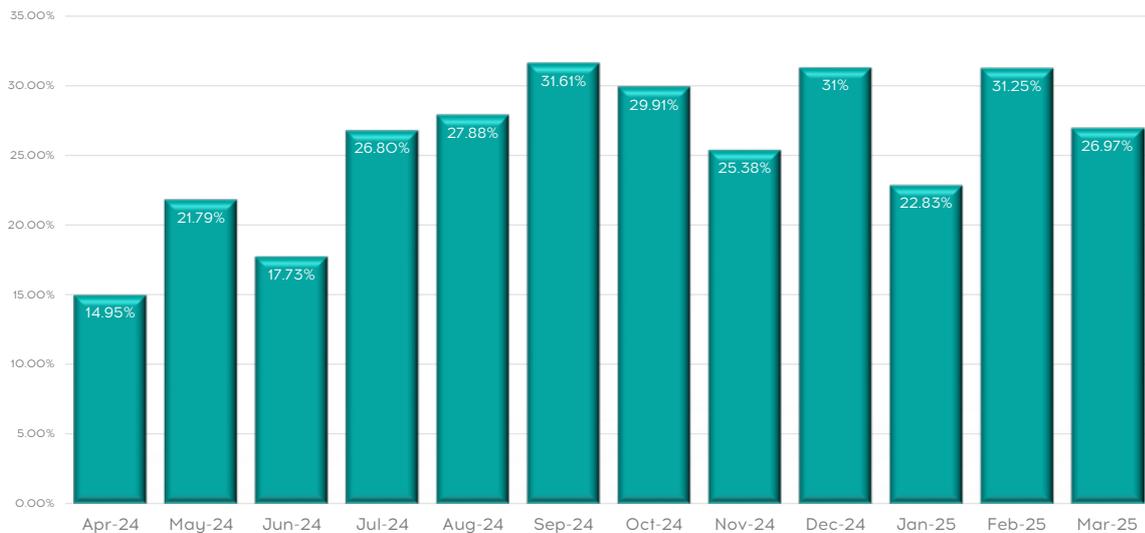
Overall adherence to timescale in 2024/2025 for escalated cases was 98.5%. Non-compliance against code timescales is due to delays in acknowledging the Stage 2 request, no Stage 2’s were responded to outside of the response timescale (20+20).

Following the dip in Code compliance in July the acknowledgement process was changed, and Stage 2 Team Leaders are now responsible for all logging and acknowledgements of Stage 2 complaints, this has resulted in almost 100% compliance since. There are isolated issues relating to business areas not forwarding escalation requests within a timely manner, which impacts acknowledgment timescales, however mainly customers request escalations directly through Customer Care.



84% of Stage 2’s did not change the Stage 1 outcome decision, indicating robust and accurate Stage 1 investigations and fair Stage 1 outcomes.

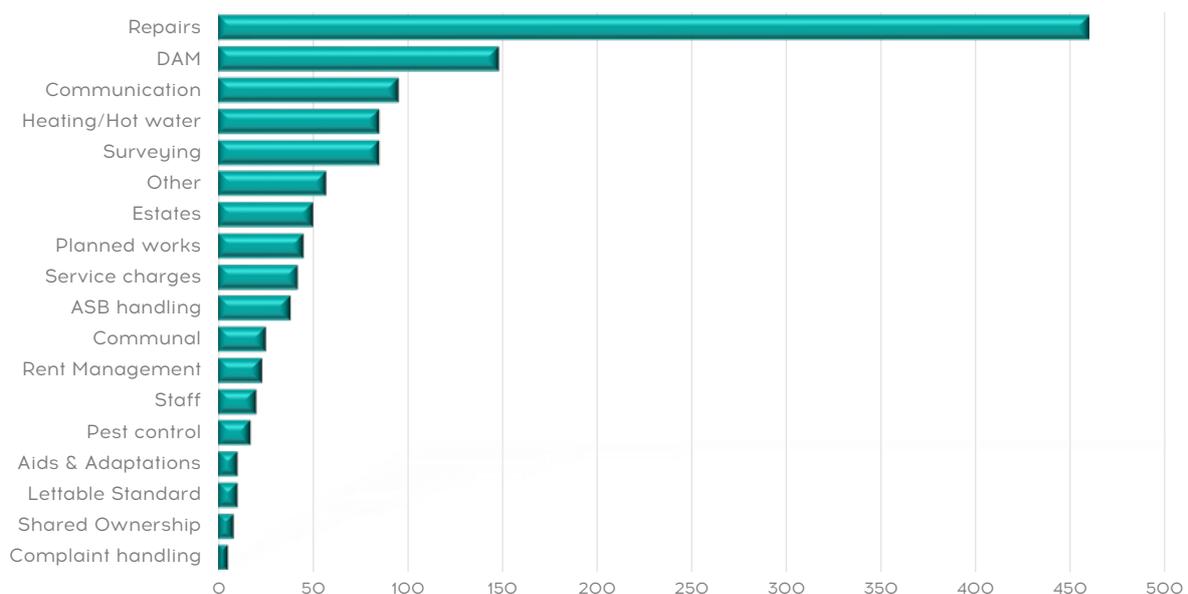
% of Stage 1 complaints escalated to Stage 2 in the year



The year has seen an increasing % of Stage 1 complaints escalating to Stage 2, with the highest percentages seen in September, December and February, all at over 31%. The year average is 25.2%.

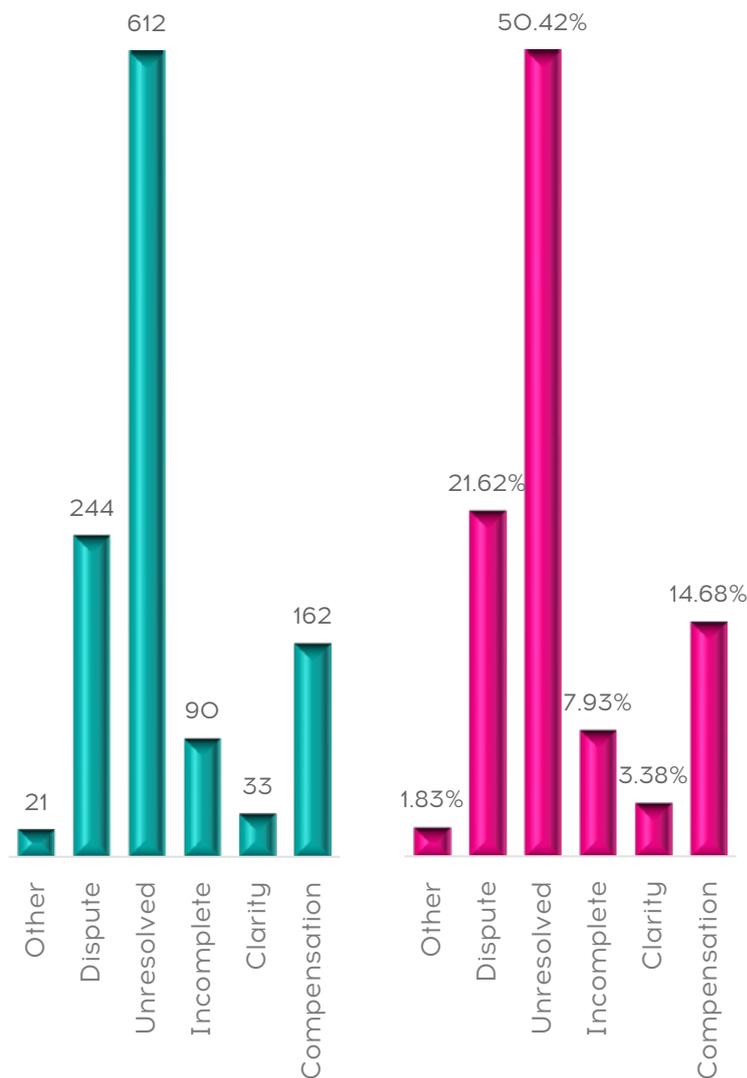
The high escalation rate presents a concern, and we are actively working on improvements to address this issue. Directors have been driving cultural change on complaint action ownership within business areas since December as well as structural and process changes within property services focusing on ensuring complaints are resolved at Stage 1. The introduction of the Complaint Action pilot is also focusing on ensuring complaints are resolved at Stage 1, through enhanced monitoring and tracking by a dedicated team.

Stage 2 cases by business area 2024-25



Repairs delays account for the majority of escalations (38.8%) and this reflects the main reason for complaints overall.

Stage 2 cases by escalation root cause (number and %)



Compensation

Where compensation was the reason for escalation, this was primarily due to complainants requesting the amount offered was increased better reflected the impact of our service failure. There was also an issue with compensation not being paid on time and bank details not being received on 6 cases.

Clarity

In some cases, we needed to reword parts of our Step 2 responses for complainants as our explanation of issues – about service charges for example – had not been clear enough.

Incomplete

In some of our Step 2 responses we had not addressed all the issues raised by complainants either in their original complaint or in our investigatory conversations with them.

Unresolved

Some complainants escalated their complaints as we had failed to take the actions promised as part of our Step resolutions.

Dispute

In some cases, complainants disagreed with the decisions made based on our policies or subject matter experts – whether a kitchen upgrade was due for example.

Other

The range of other individual reasons for escalation included our planned maintenance programme, timescales for scheme wide decarbonisation works, an insurance claim, a disposal, a request to move and raised expectations.

“Unresolved” is the highest driver for escalations, and this represents repeat failure. We have faced considerable challenge in ensuring promises made during the complaints process are delivered to fully resolve the complaint.

Throughout the year we have continued to review processes to try and ensure business areas have the tools and information to ensure complaint promises are carried out. However, ongoing work is required in this area.

We revamped the complaint action tracking in September to streamline the process and provide real time information to business areas. Since December Directors have been driving cultural change on complaint action ownership within business areas. In April structural and process changes within property services are focusing on ensuring complaints are resolved at Stage 1 through closer monitoring and post repair inspections. The introduction of the Complaint Action pilot in April is also focusing on ensuring complaints are resolved at Stage 1 and our customers are communicated with effectively.

Housing Ombudsman Activity 2024-25

This section looks at the Housing Ombudsman activity during 2024-25.

Our 2023-24 report by the Housing Ombudsman can be found here [Landlords Archive - Housing Ombudsman](#). This report, for determinations in the year 2023-24, noted that we had a maladministration rate of 79% ahead of the sector average of 73% and that we had performed poorly as compared to landlords of a similar size and type.

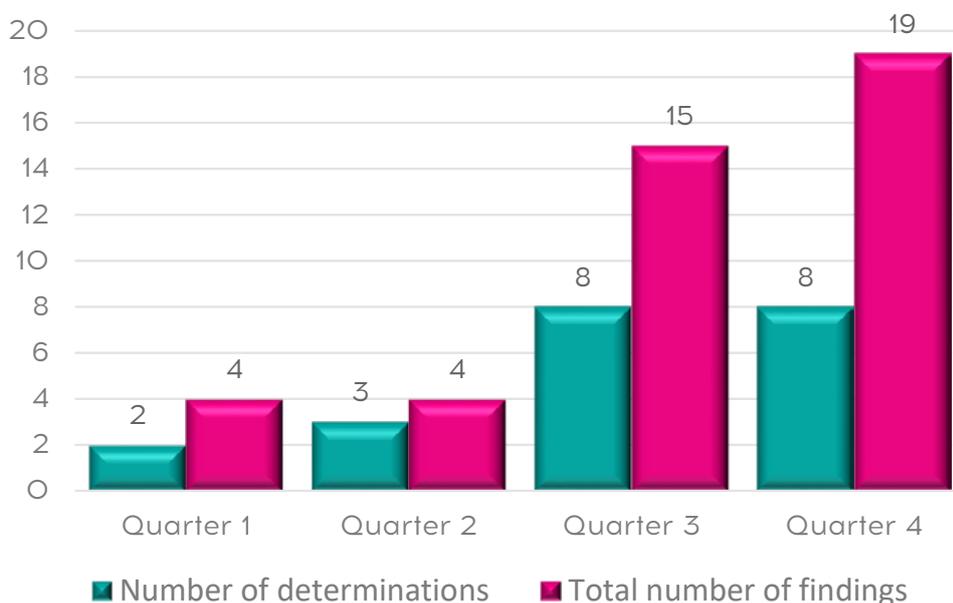
We have recently received our draft report for 2024-25 for review ahead of publication. This indicates significant progress in 2024-25 with GSAs maladministration rate for 2024-25 being lower than the national average and lower than the rate for landlords of a similar type/size. As soon as the final report is published by HOS, we will share the full report on our website.

A breakdown of this year's determinations is shown below (covering determinations received from HOS in the year) and shows an improvement on 2023-24 with a significant reduction in severe maladministration (2 cases in 2024-25 compared to 10 in 2023-24). Maladministration determinations have also reduced from 52 in 2023-24 to 10 in 2024-25. It is noted that the number of determinations received in the year also relates to processing delays at the Housing Ombudsman Service, resulting from a sector-wide increase in cases referred to them.

We have had a high volume of evidence requests during 2024-25. Number of evidence requests per quarter in 2024-25 is shown in a table late in the report.

As of 31st March 2025, we have 67 cases, where we have submitted evidence, awaiting determination and 9 cases in the evidence-gathering process. While we processed these evidence requests in 2024-25, the determinations will form part of 2025-26 reporting.

Breakdown of determinations and findings per quarter 2024-2025



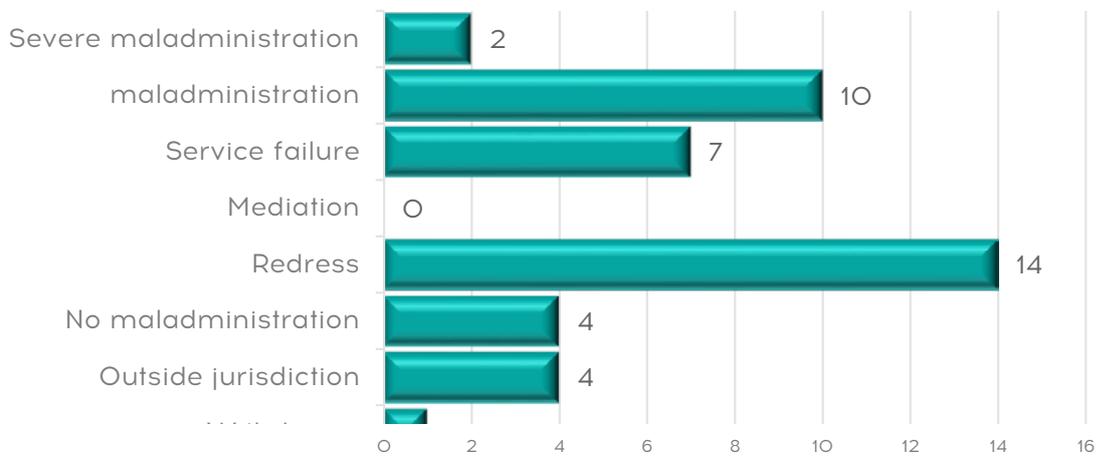
In 2024-25 there were 21 determinations with 42 findings.

This is a considerable reduction on last year where there were 41 determinations and 103 findings (see link in 5.2 to Annual Landlord Report).

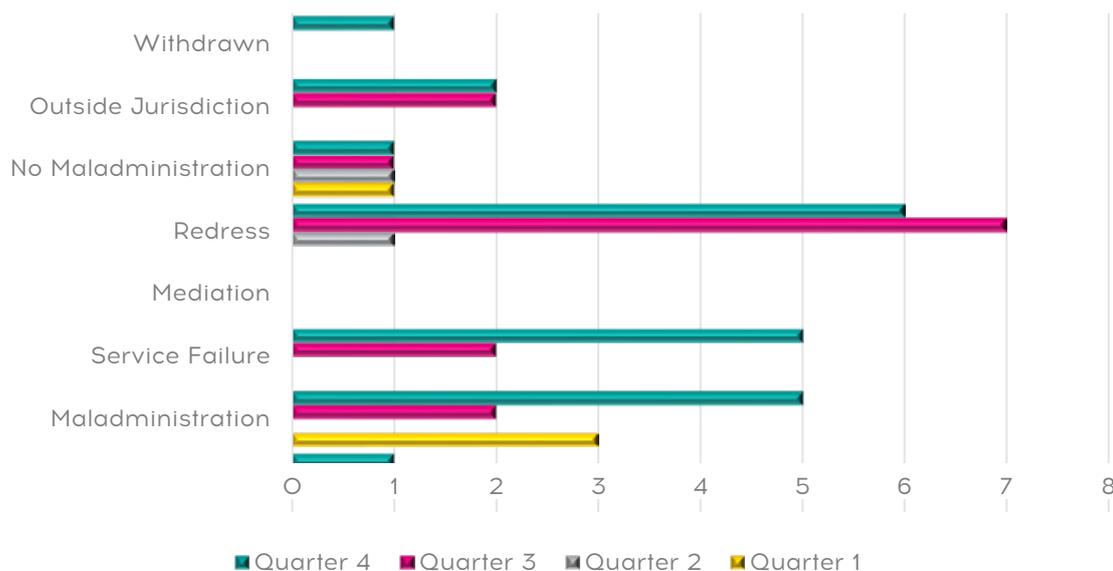
The reduction in determinations is also due to processing delays at the Housing Ombudsman Service, resulting from a sector-wide increase in cases referred to them.

Housing Ombudsman determinations by findings 2024-25

Summary of Determination Findings 2024-25



Breakdown of Findings by Quarter 2024-25



As indicated maladministration findings have reduced in number compared to 2023/24 and we have also seen a much higher volume of outcomes of sufficient redress.

In part this may reflect changes to our remedies and compensation guidance. We have significantly improved how we reflect service shortfalls and offer suitable redress, including considering factors such as impact and customer vulnerabilities.

In 2023/24 our maladministration rate (including all cases of service failure and maladministration) was 79%.

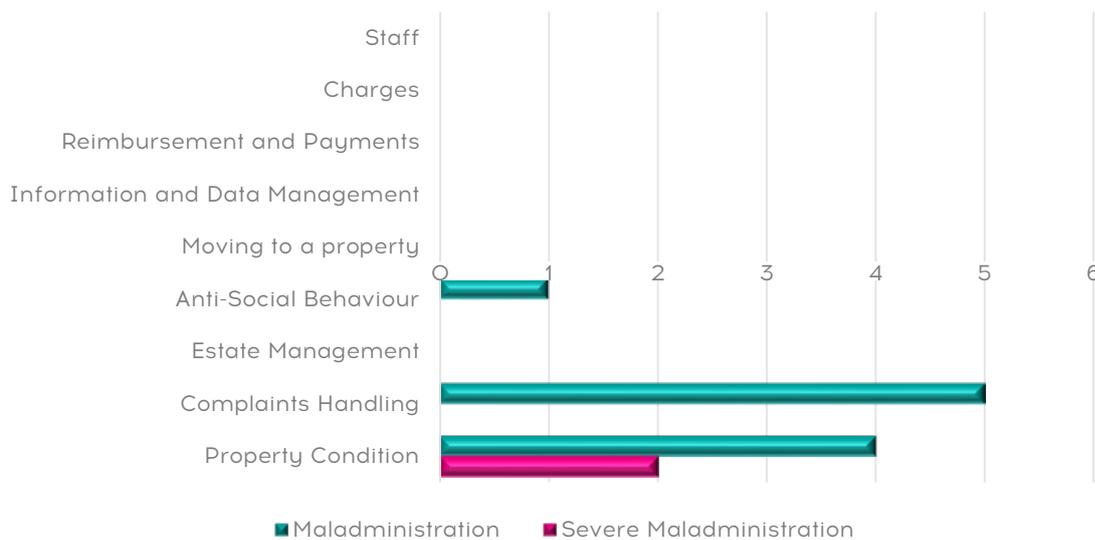
Based on our internal recording measures and using the same methodology, our maladministration rate for 2024-25 is 45% which is a significant improvement.

The draft HOS Landlord report for 2024-25 indicates that they have changed their methodology for calculating the maladministration rate for 2024-25, and as a result there is a slight variance in the HOS figure. We will align our reporting in 2025-26 to align with the revised HOS methodology.

We note, however, the number of cases with HOS and awaiting determination.

Severe Maladministration/Maladministration by Category 2024-25

Breakdown of Categories for each finding of Severe Maladministration/Maladministration during 2024-25



The breakdown indicates the two most prevalent categories for maladministration outcomes continue to be complaint handling and property condition, although the numbers in 2024/25 were much lower in volume than 2023/24.

In 2023/24, we had 10 cases of severe maladministration and 52 cases of maladministration; in 2024/25 we had 2 cases of severe maladministration and 10 cases of maladministration.

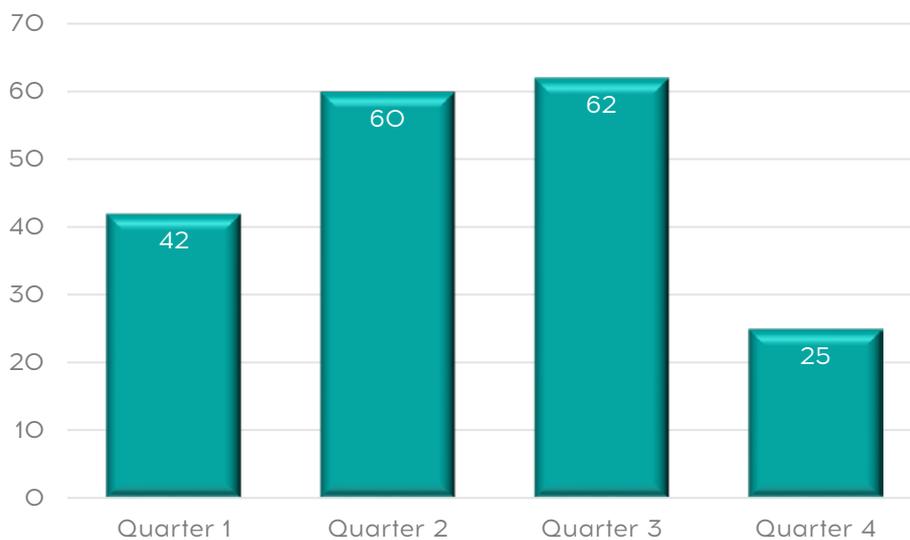
Complaint Handling Failure Orders (CHFOs)

Following an increase in internal controls and oversight, no Complaint Handling Failure Orders were received in 2024-25 (compared to two in 2023-24).

This reflects improved internal controls in ensuring Housing Ombudsman communications are identified and responded to, by a dedicated post-holder in place to lead on Housing Ombudsman communications.

HOS Evidence Requests received within each quarter during 2024-25

No. of evidence requests received each quarter 2024-25



We have received a steady volume of evidence requests throughout the year; processing 189 evidence requests in total. This has varied between 4 requests in February 2025, compared to a high of 25 in November 2024. The average number per month is 16. Variability in requests may, in part, be linked to resources at the Housing Ombudsman Service to process them, so requests per quarter may not reflect volumes escalated to them in the same period.

To support the timely and efficient management of evidence requests, we have a dedicated Housing Ombudsman Liaison Manager in post who manages all requests. Despite the high volumes, all have been responded to timescale with 100% compliance in meeting HOS requirements.

We have also developed a specific procedure for managing formal requests for evidence to ensure we cooperate fully and effectively with the Housing Ombudsman Service.

We continue to work on root-cause issues to reduce the volumes escalated to the Housing Ombudsman Service.

Other reports by HOS in relation to GSA and actions taken

In October 2024, the Housing Ombudsman published its report into GSA following their special investigation of GSA under Paragraph 49 of its powers.

This report focuses on key areas and themes:

- ◆ Complaint handling- most notably the use of the former 'resolve' stage; lack of escalation and delays
- ◆ Compensation
- ◆ Policies and Procedures
- ◆ Repairs- including delays; knowledge and information management; vulnerability and repairs and satisfaction with repairs.

Overall, the report identified areas that we had already identified internally and had either changed or were in the process of making improvements.

This was recognised in the following statement included within the report: The landlord has pro-actively sought to implement improvements from the determinations prior to the publication of this report. We commend the leadership of the landlord for its positive approach to learning from this investigation.

There were 17 recommendations in the report, all of which were signed off as completed in February 2025, following a period of follow-up monitoring by the Housing Ombudsman Service.

In November 2024, we also received a Compliance Report from the Duty to Monitor team following a review of our self-assessment against the code. There were some actions arising from this, mainly related to content in our complaints procedure that needs to be published and minor changes to the complaints policy (all of which were actioned in required timescales). The following positive comments are noted throughout the report:

During this assessment, it became clear that the landlord has made significant progress in making improvements to its complaint process.

Another area that was identified as a positive area for the landlord was its complaint analysis and commitment to learning from complaints.

It is encouraging to see the landlord display its commitment to drive improvement and positive culture by embedding these procedures into its ongoing training.

The language and overall tone of both the complaint policy and the landlord's report are indicative of a positive complaint handling culture and indicate that the landlord sees the value in complaints. The wording suggests that complaints are welcomed and used as an opportunity to learn and improve.

Service Improvements made as a result of the learning from complaints

We are committed to learning from complaints and have several established means of doing this:

- ◆ We have a learning dashboard that includes outcomes and actions following individual complaints. The learning dashboard is shared with relevant directorate leads to show trend data in relation to root causes.
- ◆ Evergreen sessions are held with key colleagues following any HOS determination of severe maladministration (or where there is an issue that requires deep dive focus).
- ◆ Since April 2024 we have issued colleagues with quarterly learning updates focusing on both learning in GSA and wider sector learning.
- ◆ Trends and learning are discussed as part of our Voice of the Customer Webinars.
- ◆ Service improvements are captured and reported through Voice of the Customer updates.

Below is a summary of service improvements activity during 2024-25.

Complaint Handling

We revised our complaints process in April 2024 and removed the former 'resolve' stage which was not working effectively and did not meet code requirements.

As part of revised processes, we established an early resolution team who aim to acknowledge and respond to less complex complaints in 5 working days.

We have made changes to our structures to improve customer service and now have dedicated Stage 1 and Stage 2 teams.

We have a programme of audits in place and are committed to ensuring good quality letters that demonstrate the 4 R's of apology- regret, responsibility, reason and remedy.

What's next? We are piloting a new approach with a dedicated team focused on ensuring complaint resolutions are followed through via enhanced monitoring and tracking of follow up actions.

Compensation

We have updated our compensation policy to include a wider range of remedies and to better reflect the Housing Ombudsman remedies guidance.

We have an internal guidance document to ensure we demonstrate fairness and consistency.

Management of ASB

We completed a full review of our ASB processes following a Housing Ombudsman determination. Although we had harmonised processes across our localities, including the consistent use of React software, the review highlighted there were further improvements to be made in ensuring our procedures were being consistently applied.

As a result, we have strengthened internal audit arrangements and ensured feedback is provided to colleagues as necessary.

What's next? In 2025-26 we are rolling out additional externally delivered training, focused on best practice in ASB management.

Damp and Mould

We have Mobyssoft software in place and complaints data relating to damp and mould in the last 12 months has been input. This allows early identification of any recurring damp and mould issue and will also assist in identifying any issues in connected properties/ blocks.

We have also commenced use of video assist software to allow us to assess damp and mould remotely, improving responsiveness to reports of damp and mould.

What's next? We are reviewing and updating all our processes to ensure we meet the requirements of Awaab's Law.

We are implementing a scoring system to assess risk (e.g. low, medium, high) to a customer when damp and mould are identified, and which will inform the decision on whether there is a need to offer a move to temporary accommodation.

Repairs Handling

From April 2025, we have integrated the repairs and maintenance surveyors into the repairs team to allow for a more integrated service that optimises how we best use resources and ensures a more effective service for our customers.

The property team have introduced more rigorous case tracking of complaint actions and are introducing a new process of post inspecting any works arising from Stage 1 complaints.

What's next? We will continue to review the effectiveness of our repairs service and make changes as needed.

Planned investment in 2025/26 will support our strategic objective to improve the condition of our current homes.

Empty Homes Standard

We completed a full review of our empty homes standard and rolled this out across GSA geographies, with processes in place to ensure that we consistently work to

the standards we have set. This was validated in a review of our internal Quality and Compliance team.

What's next? Following the planned integration of our housing management systems, we plan to complete an end process review of our void management processes to ensure they are as efficient and effective as possible.

Estates Management

We have restructured the teams to introduce Quality Managers and Team Leaders for each service, that now visit each site, each month to ensure our teams of operatives are delivering services in line with the service specification.

We have introduced internal reporting that enables our housing colleagues and customer representatives to hold our teams to account for the service they provide.

We have rewritten and relaunched a new grounds maintenance specification, agreed by our customer panel, that will support our mission to provide consistently great services for our customers.

We have remodelled the costs of the services, making this a fairer and more transparent costing model across all localities, removing inequality of costs.

Customer Involvement and Engagement

Our Customer Panel has gone from strength to strength in 2024-25, with new members and dedicated work streams covering key areas.

The Chair of the Customer Panel provides reports to the Board, ensuring the customer voice is heard through our governance structures.

Following feedback from our Customer Roadshows in summer 2024, we have established a new Locality fund to meet demand for estate/ scheme enhancements beyond core landlord functions.

We have introduced a new customer feedback mechanism through our website.

What's next? We are developing further opportunities for wider customer involvement and engagement in areas such as quality checks and policy reviews.

Customer Vulnerabilities

We have introduced a new vulnerability procedure and vulnerability strategy. These are focused on the 3 R's of vulnerability- recognise, respond, record.

We have developed bespoke training for colleagues, including additional training on meeting the needs of customers with diverse needs, including learning disabilities, mental health, dementia and sensory needs.

We are using customer contact points, such as tenancy audits and complaints, to check that the vulnerability information we hold for customers is up to date.

Through our integration to one housing management system across all GSA geographies, we are reviewing how we more effectively record vulnerabilities, communication preferences and any reasonable adjustments.

What's next? The implementation of the Vulnerability Strategy, as linked with the wider GSA Customer Strategy.

Customer Insights

We are working on our customer data to ensure we can use the data more effectively to review that our services are delivering equity of outcomes for our customers.

What's next? Through our data warehouse, we can cross reference different systems to assess if there are variances in outcomes across key areas such as complaints, repairs and ASB handling.

We have completed a review of 2024-25 outcomes, and will use this as a baseline for quarterly review in 2025-26.

Through our work on customer data, we are looking to strengthen how we use customer insights to both evaluate current services and plan future services to better meet customer needs.

Our customer strategy, vulnerability strategy and digital plans all include priorities around improving how we capture customer data, ensure it is up-to-date, and use it to tailor services to individual needs.

Record Keeping

We acknowledge that we needed to make improvements in the consistency of our record keeping (also known as knowledge and information management).

We have an established Information Governance Group in place to oversee improvements in this area, including identifying data owners and data stewards and ensuring they are trained appropriately. We have also introduced a new Data Quality policy.

What's next? As part of the integration to one housing management system, we are rolling out additional colleague training that will cover expected standards of recording.

We will ensure monitoring arrangements are in place to validate that recording is in line with expected standards.

