



ANNUAL COMPLAINTS PERFORMANCE AND SERVICE IMPROVEMENT REPORT 2023-24

Foreword

Response from David Greenhalgh, the Member Responsible for Complaints (MRC) on behalf of Homes and Customer Experience Committee:

At a meeting held on 24th June 2024, we reviewed the comprehensive annual complaints report, service improvement report and the updated annual self-assessment against the Complaint Handling Code.

As the Committee with delegated authority for the oversight of complaints, we:

- approved the annual complaints and service improvement report
- reviewed and scrutinised the self-assessment against the Code and determined that it provided assurance that the approach to complaints management is in line with the requirements of the Code.

As a Committee we are aware that the organisation has been on an improvement journey that includes the handling of complaints and the root-causes that contribute to complaints volumes and, importantly, changes to culture, behaviours and ownership of complaints. Throughout the year, we have had full visibility of complaint volumes and the review of thematic root-causes that was undertaken, and we recognise that the report is an open and transparent reflection of the position.

We acknowledge that there is work to do to improve our customers' experiences but are assured that a culture of learning has been enhanced, particularly regarding root-cause thematic learning. We recognise that changes need to be embedded and consistently applied and are committed to ensuring appropriate scrutiny of improvement activity. We are assured that our current learning processes include reflecting on learning both within GSA and the wider sector.

The GreenSquareAccord complaints policy and procedure has been reviewed in full to ensure it meets the requirements of the updated Code. We will continue to receive complaints reports on a quarterly basis to retain oversight of complaint volumes, trends and learning activity.



David Greenhalgh Member Responsible for Complaints

Introduction

This report provides an overview of complaint activity for the year 2023/2024.

The annual report is intended to support members in ensuring effective oversight and governance of complaints. It is aligned to the requirements of the Housing Ombudsman Complaint Handling Code (referred to as 'the Code') that requires the following to be included within the report:

- Our self-assessment against the Code
- 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
- its actions following any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

Executive Summary

We have continued to see significant increases in complaint volumes. 2061 step 2 complaints were received in 2023/24, an increase of 59.5% compared to 2022/23 when 1292 step 2 complaints were logged, and an increase of 206% compared to 2021/22 when 674 complaints were logged. For clarity in 2023-24, Step 2 is equivalent to Stage 1, the first stage of the formal process. From April 2024, we have renamed our stages to Stage 1 and Stage 2 to make this clearer to customers and ensure compliance with the revised complaint handling code.

We have continued to receive determinations from the Housing Ombudsman Service (HOS) and while we have had no findings of severe maladministration in Quarter 3 or 4, our overall maladministration rate has remained high and above the sector average which was 55% in 2022/23. For 2022/23 we were named as one of the providers with a maladministration rate of over 50% and this position has continued during 2023/24. It is noted, however, that determinations relate to complaints predating our new business strategy and more intensive focus on thematic service improvement activity.

In mid-2022 we recognised the need to make changes to how we were working to address the feedback we were receiving from our customers. Following a period of review, our new business strategy 'Simpler, Stronger, Better' was launched in April 2023. This recognised we had to focus on our core landlord service and simplify our business to improve our customer offer and the quality of our new and existing homes. As part of the strategy, changes were made with operational team structures to support the delivery of the strategy. Following several determinations of severe maladministration, in September 2023, the Ombudsman announced we would be subject to a review under Paragraph 49 of its powers.

We had already recognised internally there was a need for improvement, and we knew we had to deliver better service to our customers.

During 2023/4 we have had a sustained focus on understanding the root causes of our complaints and determinations and taking action to address these.

While the Housing Ombudsman has not yet published its review findings, we have internally recognised and acknowledged there are areas where we have got things wrong or could have done better. Through both this report, and our additional service improvement report, we are able to evidence some of the steps we have taken to remedy these and improve our services to customers.

As a result of the time-lapse in determinations, we continue to see determinations with the same recurrent themes. These pre-date our focused service improvement activity and we recognise it will take time to be able to measure the impact of this activity in determination outcomes and themes.

We had recognised our complaint procedure in place during 2023/4 was not working in the way we intended. Our informal stage 'resolve' was not always effective and was causing confusion for customers while several determinations from the Ombudsman queried the compliance with the former code. Delays in making changes were due to waiting on the outcome of the Code consultation and to avoid making changes in quick succession. And the publication the updated Code in 2024 was a catalyst to make changes to our processes with the aim of improving our customers' experience of our complaint handling.

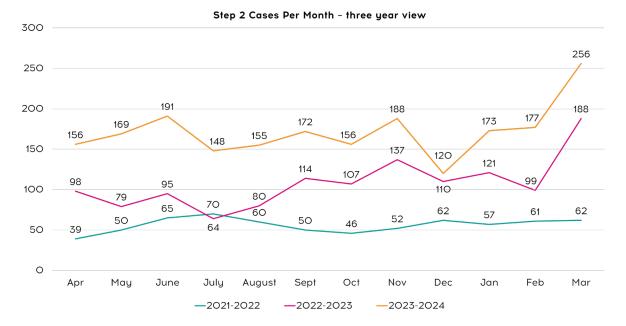
Our self-assessment against the 2024 Code

A copy of our self-assessment against the Code is available on our website.

For clarity, this is a self-assessment against the 2024 Code, while the rest of this report relates to complaints responded to in 2023-24, under the former code.

The self-assessment reflects the changes we have made to our complaints policy and procedure to ensure it aligns with the Code.

Complaints data and analysis 2023-24



Step 2 (equivalent to Stage 1) complaint volumes

The graph maps complaint volumes over the last three years with current year end being the black line.

Step 2 was the first stage in the formal process (now known as Stage 1), after the informal stage 'resolve.'

There were 2061* step 2 complaints in 2023/24, an increase of 59.5% compared to 2022/23 complaints where 1292 step 2 complaints were logged, and an increase of 206% compared to 2021/22 where 674 complaints were logged.

2023-24 data is shown below, indicating that, quarter on quarter stage 2 (Customer Care) complaint volumes were:

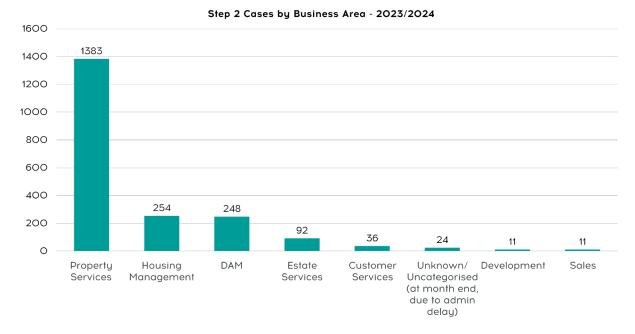
- Quarter 1 516
- Quarter 2 475
- Quarter 3 464
- Quarter 4 606

Following a marginal reduction in Quarter 3, there was an increase of 30.6% in Quarter 4 as compared to Quarter 3. A similar sharp increase in March was also seen 2022/2023.

*This includes all step 2 complaints logged in 2023/4 and may vary slightly from case numbers reported in the TSM return due to variances in methodology.

Complaints we have not accepted in 2023-24

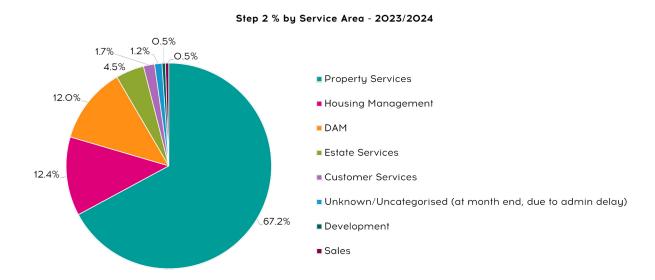
One complaint was deemed to be out of policy scope and was referred to our Data Protection team to investigate and respond to.



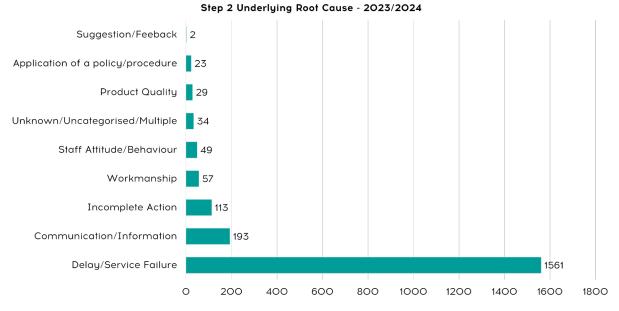
Step 2 complaints by business area

Complaints involving Property Services (repairs and assets) when added to damp and mould (DAM) cases represents 1,631 cases: 79.1% of the overall volume for the year.

The second highest area is Housing Management, although it should be noted this includes rent and service charge issues now managed by Finance together with more traditional housing management issues, such as ASB case handling.



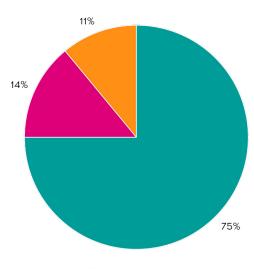
Additional breakdown by percentage for each service area.



Step 2 complaints by underlying root-cause

Delay continues to be the biggest cause for complaints, at just over three quarters of the overall volume; whist the majority of this relates to day-to-day repairs, a significant amount relates to surveying services and failure to respond at the informal stage 'resolve' (step 1).

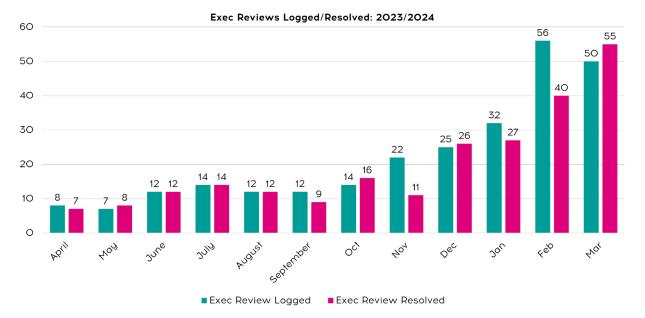
Step 2 Outcomes - 2023/2024



Step 2 complaints by outcome

Upheld Partially Upheld Not Upheld

The year end position shows 75% of Customer Care (step 2) cases being upheld, and this, together with partial and not upheld percentages is broadly representative of the month-on-month position.



Step 3 (Exec review) complaints by volume (logged/resolved)

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.

Adherence to timescale in 2023/2024 for escalated cases was 99.6% (one response in June was sent one day late due to an oversight) and 21 cases (8%) had a change of outcome (either from not upheld to upheld, or from partially upheld to upheld).

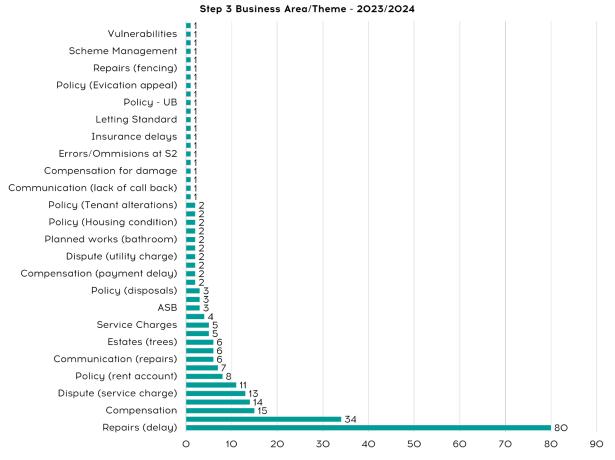


Step 3 cases and as a % of step 2 logged

This graph shows a steep increase in escalated cases since November 2023, with the number of cases escalating in March 2024 being 6.25 times higher than in April 2023. There are various drivers to this as dicussed later in this report.

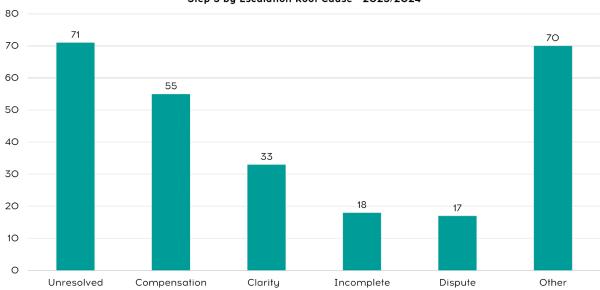
Resolution of older cases, especially in early 2024 meant a higher number of older cases were closed at step 2.

Step 3 cases by business area

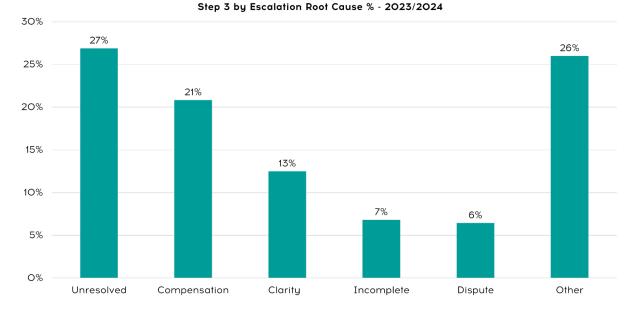


Repairs delays account for the majority of escalations (30.1%) and this reflects the main reason for complaints overall.





Step 3 by Escalation Root Cause - 2023/2024



Compensation

Most customers reasons to escalate was to ask for increased compensation which 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 2 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 higher driver for escalations, and this represents repeat failure. We face considerable challenge in ensuring promises made during the complaints process, are delivered.

Learnings from complaints are shared for each case with operational teams as part of the complaint closure process, as well as in summary format at month end, and promises are tracked by Customer Care, however, the challenge is often around resource/capacity to deliver against timescales, most notably in teams with recruitment pressures.

Findings of non-compliance with the code

This section looks at the Housing Ombudsman determinations made during 2023/4.

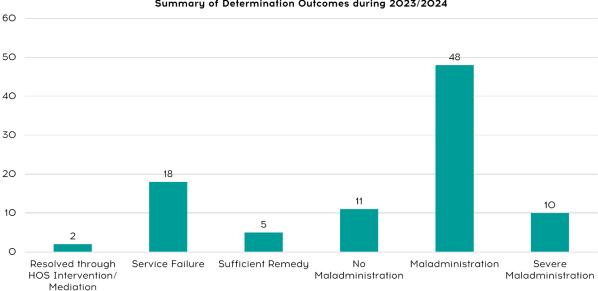
While not all specifically indicate non-compliance against the Code, complaint handling was the highest area of maladministration in 2023/4.

Areas of concern in relation to complaint handling and our compliance with the Code include:

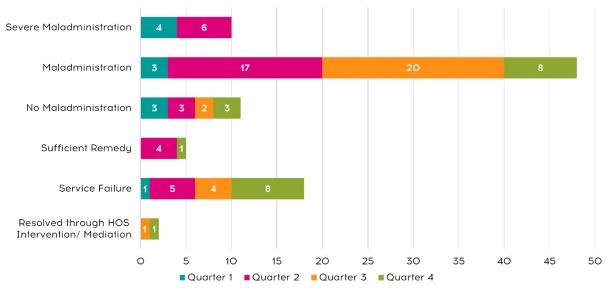
- Nonadherence to code and our procedural timescales
- The use of our informal stage 'resolve', a lack of clarity to customers and the view it was in effect a three-stage process rather than two stage (as required by the Code)
- Failure to identify some complaints and progress them through the formal process
- Failure to identify escalations or declining to progress complaints to the second stage
- Failure to show sufficient empathy and contrition
- Failing to offer appropriate redress through our compensation policy, in breach of the HOS remedies guidance.

Further analysis of determinations is shown below.

Housing Ombudsman determinations by outcome 2023-24



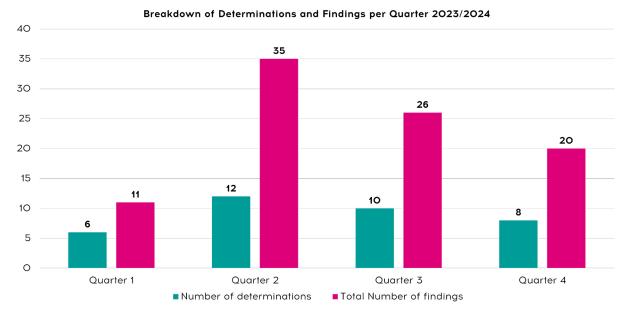
Summary of Determination Outcomes during 2023/2024



Breakdown of Determination Outcomes within each Quarter 2023/2024

There continues to be a high volume of findings of maladministration with some reports including multiple areas of maladministration. This means our overall rate of maladministration remains high and ahead of the sector average (as compared with 2022/2023 data).

Across 2023/24, there have been 94 findings, of which 76 (81%) related to maladministration or service failure. There have been no determinations of severe maladministration in Quarter 3 or 4. There was, however, a peak of maladministration determinations in Quarter 3.

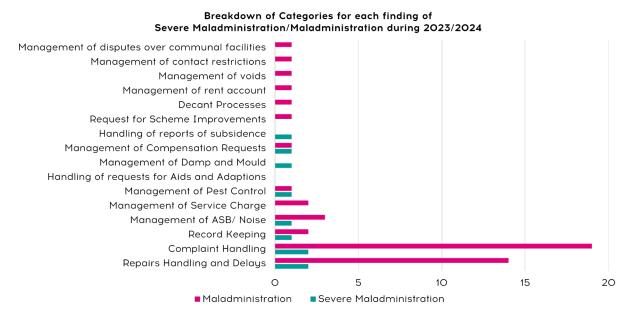


Breakdown of determinations and findings per quarter

In 2023-24 there were 36 determinations with 92 findings (this excludes the two resolved with HOS intervention).

It is noted that each determination may have multiple findings; this has been the case for GSA.

Severe maladministration/maladministration by category 2023-24



The breakdown indicates the two biggest areas of concern were complaint handling and repairs handling/delays. Other areas of repeat focus were:

- ASB handling including completing harm/risk assessments and keeping the customer up to date
- Record keeping shortfalls in record-keeping were identified across business areas
- Management of compensation failing to offer sufficient redress/remedy.

Complaint Handling Failure Orders (CHFOs)



Both cases relate to us failing to reply to requests from the HOS to provide responses. Housing Ombudsman correspondence was being sent to generic email groups and was not always identified and responded to. As a result, an email rule was set up to ensure HOS correspondence would also be forwarded to managers in the Customer Care team. There have been no further issues since this change was made.

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:

- Learning outcomes and actions are issued following individual complaints
- Evergreen sessions are held with key colleagues following some HOS determinations
- The complaints dashboard is shared with relevant directorate leads to show trend data in relation to root causes
- 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
- From April 2024 we are issuing quarterly learning updates focusing on both learning in GSA and wider sector learning.

To inform our service improvement programme, and to ensure we were looking at learning holistically at a system and process level, we undertook a thematic review of the root cause issues arising from complaints and determinations. This review included reviewing our case work and also considered wider sector learning, including issues raised in the Housing Ombudsman spotlight and insight reports.

This review indicated the following areas of priority focus:

- Customer Vulnerabilities: knowing, recording, and acting on vulnerabilities. The 3 R's-Recognise, Respond, Record
- Record Keeping: knowledge and information management
- Policies and Procedures: having clear policies that are followed in practice through effective implementation and monitoring; staff training around key policies and procedures
- Communication with customers
- Complaints Handling: demonstration of sufficient empathy and contrition; responding within code timescales; ensuring complaints are identified as complaints and the complaint procedure is followed
- Compensation payments: demonstration of sufficient redress in line with the HOS Remedies guidance.

A more detailed overview of service improvement activity in 2023-24 is included in Appendix 1.

The HOS annual report of GSA performance and actions taken

The HOS annual report of GSA 2022-23 is available on the complaints section of our website.

This indicates that our 2022-23 maladministration rate was 76%, ahead of the sector average of 55%.

In 2022-23 there were 19 determinations with 42 findings; in 2023-24 there were 36 determinations with 92 findings.

In 2022-23 there were 29 maladministration findings; in 2023-24, there were 58 maladministration findings (48 maladministration and 10 severe maladministration).

Receipt of the HOS annual report of GSA 2022-23 coincided with intense focus on service improvement and has been a further driver for change. While we note the 2023-24 report evidences a deteriorating position, the impact of service improvement will take time to be evident in determinations due to the time lag in cases being processed.

Other reports by HOS in relation to GSA and actions taken

In September 2024, the Housing Ombudsman announced that, following six findings of severe maladministration, they intended to undertake a special investigation of GSA under Paragraph 49 of its powers.

This review is underway and has not yet been published. We are participating fully with the Ombudsman and have responded appropriately to requests for evidence.

On receipt of the report, we commit to taking on board actions arising from the review.

Conclusion

It has been a challenging year where complaints volumes and determinations have continued to rise. It is clear that we need to make improvements both to our complaints handling processes and to the root-cause issues that contribute to complaint volumes.

There has been a high volume of service improvement activity but we need to ensure these changes are fully embedded and consistently applied in order that we make a step change in customer experience.

Appendix 1: Service Improvements 2023-24

Thematic Service Improvements

Thematic Area	Action Taken	Further Action Required
Customer vulnerabilities - Recognise, Respond, Record	Cross organisational vulnerability workshop held in October 2023.	Vulnerability procedure in final draft (draft updated to report HOS spotlight report ARRRoE); training in development to
Knowing our customers vulnerabilities Recording (and reviewing) them Taking them into account in service delivery; making reasonable adjustments as required	 New Reasonable Adjustments Policy published. Programme of cascaded briefings commenced for: Reasonable adjustments policy Briefing on HOS spotlight report- Attitude, Respect and Rights- Relationship of Equals (ARRRoE) Key messages on vulnerability also delivered though: Evergreen sessions Webinars Cascaded learning from complaints and HOS determinations 	 Accessibility to vulnerability data on system and clarity on how can make changes Coustomer data project Single Housing Management Project
Communication Communicating with our customers in a timely way	 Key messages on communication revisited through: Webinars 	Engagement with colleagues has identified the following areas for further consolidation:

Communicating in a way that demonstrates empathy and builds trust and confidence Effective internal communication - not passing issues between colleagues/ teams	 Cascaded learning from complaints and HOS determinations The Customer Contact Standard has been updated and Managers are receiving data on compliance with task timescales. 	 Clear process maps of which teams deal with each query/ task, to reduce mis-directed tasks - updated mapping now underway Clarity that all colleagues know how to access tasks assigned to them through the housing management system (HMS)
 Complaint Handling, Compensation and Learning Consistently demonstrating compliance with the HOS Complaint Handling Code. Acknowledging where we get things wrong, saying sorry and taking steps to stop it happening again. Doing what we say we'll do and keeping our promises. 	 Additional resources added to the Customer Care Team to support management of cases within published timescales. Aide memoires provided to the team to support quality of outcomes in terms of: Demonstrating empathy and contrition Recognising and taking account of vulnerabilities Demonstrating sufficient redress in line with HOS remedies guidance Internal audits of letter quality now commenced via Quality Team (in addition to checks undertaken within Customer Care team). Following the publication of the updated HOS Complaint Handling Code, the policy 	We continue to evaluate the impact of the Early Resolution Team. We are also reviewing team structures and resources within the Customer Care team and wider business, to ensure that these are aligned with complaint volumes and code requirements and are sufficient to track progress against agreed remedial actions.

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and procedure has been fully updated to reflect the Code.	
Tenect the Code.	
This includes:	
Removal of the former informal	
Resolve stage - this was causing	
confusion to customers and not all	
complaints were appropriately	
identified/ escalated	
 Differentiating between Stage 1 	
complaints that can be resolved	
quickly ('early resolution') and	
those that are complex and require	
investigation. We have mobilised	
an Early Resolution Team within the Contact Centre.	
the Contact Centre.	
We have developed a GSA bespoke e-	
learning package that is being rolled out	
to all colleagues as mandatory training.	
,	
The GSA compensation policy and	
procedure has also been updated in full to	
reflect the HOS remedies guidance. Key	
colleagues have received training on this.	
Following two CHFO's earlier in the year,	
we have improved our oversight of	
communications from HOS and have a	
dedicated postholder in place who leads	
on liaison with HOS. This also includes	
monitoring of orders arising from	

	determinations are met within required timescales. In addition to our established methods of learning and cascade, we have also looked at how we better capture, share and address thematic learning. From April 2024, we have commenced sharing quarterly learning summaries; these include both GSA learning and wider sector learning.	
 Policies and Procedures Having fit for purpose policies and procedures Following them in practice- making sure we train and embed them better and have internal frameworks to monitor adherence 	Permanent Full-Time Policy Manager in place. Policy and Procedure matrix indicates significant progress in harmonising/reviewing operational procedures (previous focus on policies). Key procedures are being rolled out to relevant teams, but further work is required to embed a consistent methodology for policy cascade and training.	Need to develop a consistent methodology for policy and procedure roll-out. Need to review if internal monitoring arrangements are sufficient/ consistently applied to give assurance of adherence to policy/ procedures. Further work being undertaken on policy template.
Record-Keeping Ensure consistent standards of record keeping and data quality.	Information Governance Group now in place; requirements from the self- assessment against the HOS knowledge and information management (KIM) report has been mapped across to the	Planned training for data owners and data stewards. Engagement with colleagues has identified the following areas for improvement:

Information Governance Group action plan.	 Consistency in systems induction and training
Data owners and data stewards identified.	Co- dependencies identified with:
Extensive progress on Data Warehouse project.	Customer data project
Key messages on record keeping delivered though:	 Single Housing Management Project
 Evergreen sessions Webinars Cascaded learning from complaints 	
and HOS determinations	

Other Service Improvements

Thematic Area	Action Taken	Further Action Required
Property Services		
Repairs	 We have implemented a Planning Scorecard where each Planner conducts a weekly performance review with their line manager, and we now have robust control measures established to validate followon visits. We have streamlined a new 'no access' process which will enhance service delivery and ensure we reach all necessary repairs within target. We will also be introducing walk around days 	 Impact to be measured through: Internal teams feedback KPI scores Case / tasks tread analysis Further work being undertaken on repair procedure. Site walk around days/feedback

where Heads of Service and Regional Managers will be out on site engaging more with trades and customers. The objective is to carry out three sessions across all localities starting from May, this will provide us with evidence/feedback where we can further improve the service and identify any site faced barriers to efficiency.	
We continue to embed customer satisfaction survey follow up calls from negative comments, we also share all positive / negative comments to trades in Toolbox Talks.	
We have introduced a process where all repairs team related complaints are tracked using an internal spreadsheet, all information is managed by one person/administrator. The administrator meets weekly with all individuals dealing with cases and updates the tracker, the leadership team then meets weekly to review all cases ensuring cases are on track.	
We also have contacted Service Connect (repairs scheduling system) to determine if we can create an alert which will easily identify repairs relating to complaints and hope this will allow us to create a bespoke	

	 widget board to monitor each case effectively. The team are continuing the review the number of open repair orders and have taken the correct steps to ensure our live number of works is correct. Our focus for the new financial year is for every repair is appointed within target. The team have been reviewing the demand pattern for their respective areas, ensuring we have the right number of trades and skill set to support each area of our stock portfolio. This approach will allow us to tailor our recruitment drive to support areas where we need extra trades to deal with the demand. The Repairs Team early resolution mailbox was implemented to support this initiative, and any repair related inquiries directed to this mailbox will be a collective responsibility. These actions will be seamlessly integrated into our internal complaint tracker and managed in accordance with this process. 	
Empty Homes Standard	The Empty Homes Standard and Policy has now been subject to full review with alignment across all geographies. Training has been rolled out to relevant colleagues.	 Impact to be measured through: Complaints/HOS cases pertaining to management of voids standards. Lettings customer satisfaction scores

Pre-termination inspections are now implemented across all localities, allowing us to promptly identify any necessary upgrades, tenant damage, and categorise empty homes more efficiently. We've established a reporting template to gauge its success.	
Prior to empty homes works going live, a desktop audit is conducted, focusing on historically damp and mould related issues. Any identified problems are swiftly directed to the Surveyor team for action. During the pre-inspection stage, the inspecting Manager conducts all necessary damp readings and visual inspections, recording findings on Service Connect. Any concerns are escalated to the Surveyor team for their consideration and instruction.	
We've seen a significant improvement in record keeping by ensuring all associated information is accurately saved onto our systems, supported by completing 100% post-inspections.	
Initiating discussions with the stock condition team, we aim to integrate Service Connect processes into our empty home pre-inspections. Empty home managers will soon undergo bespoke	

Assets	training, with plans to adopt this initiative by early summer. We have appointed Surveying Managers	We are continuing to actively recruit to
A55015	in each of the two geographies and have a 30 point action plan in place to improve the Customer journey.	surveying vacancies.
Damp and Mould	 We have four Healthy Homes Advisors to support our Damp and Mould processes. The Healthy Homes advisors provide advice to customers to optimise humidity in their homes, to reduce the effects of condensation and effectively utilise their heating system and convey small changes that can make difference. The Healthy Homes Advisors also identify and report property surveys which require detailed technical investigations or complex solutions. 	 We are implementing a damp and mould case management system (Mobysoft) to support case management. The software will link into our repairs system and use Al to alert us to where there could be potential for damp and mould in our homes so that we can address the matter. The system will search historic data to inform us and will also provide triggers if certain actions haven't happened during a time period specified, in addition to this the system will also alert us to hot spots; where multiple flats are reporting issues in the same block for example to trigger a whole block survey. Mobysoft will be integrated to identify where there are any customer vulnerabilities recorded on the system, so these can be checked against and considered in how we respond.
Estates	In response to customers telling us they are unclear about specification and	We are also exploring sharing this via a QR code.

	frequency of services, we have updated specifications, displayed these in schemes and shared in new tenancy packs. In relation to concerns about overflowing bins/risk of vermin, we are recruiting Waste Management teams to carry out bulk waste removal and reduce fire risk actions	
Pest Control	We updated text on our website to provide more clarity to customers on roles and responsibilities. We also introduced a new pest control procedure to support this.	
Homes and Communities Lettings	We have improved communication with customers to keep them updated on our offer of housing and improved methods for customers to provide notice to quit, including an online digital form. We have also improved timing of adverts of available homes and made the decision to complete more viewings during empty home works.	
Localities	Customers told us they would like to see the progress of their application online and self-serve when looking to complete a mutual exchange (assign their tenancy).	

	We are working with our digital service provider Homeswapper, to utilise their online tracking tool to enable customers to view what part of the decision making progress their case is at, for example, property inspection has been passed.	
Management of ASB	 The ASB policy and procedure has now been subject to full review with alignment across all geographies. All geographies are now using ReAct as a means of monitoring reports of ASB and maintain records of risk assessments, action taken and communication with customers. Training has been rolled out to relevant colleagues. 	 Quality team to conduct a compliance audit by 30/6/2024. Impact to be measured through: Complaints/ HOS cases pertaining to management of ASB. ASB CSAT scores
Customer Services		
Contact Centre	Increased structure has been added to the new starter induction with the addition of cross-skilling training modules. This reduces the time for colleagues to be competent across all functions and allows us to train more new starters at the same time.	



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