

**Housing**  
Ombudsman Service

**Responses to the  
consultation on our  
Business Plan  
2020-21**

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## Introduction

As a public service that is funded by subscription from our members, it is important that we are accountable for the way we use our resources. We are an arms-length body of the Ministry of Housing, Communities and Local Government so we are accountable to parliament, but we also have a duty to:

- the landlords who are members of our Scheme
- residents who have every right to expect prompt and proper consideration of complaints by their landlords and by us, and who ultimately fund our Scheme through their rent.

In October to December 2019, we consulted on our Business Plan for 2020-21. The consultation document set out new approaches to how we handle casework in order to provide faster, effective redress. It asked for feedback on five questions about different aspects of our service, all open questions.

We ran a separate consultation on our proposed changes to the Housing Ombudsman Scheme to support the new approaches in the business plan. The responses to that consultation is covered in a separate report.

We would like to thank all those who took the time to respond. We considered all the comments and views expressed. This document is not intended to cover the detail of all the responses received but provides a summary of the key issues and comments made.

## The consultation process

We published the [consultation document](#) on 25 October 2019 (at the same time as the Housing Ombudsman Scheme consultation), and the consultation ran for six weeks to 6 December.

During the consultation period we:

- Published the consultation online for web users to respond to and enabled responses to be emailed to us directly - and promoted it through the media, social media, our e-newsletter, targeted emails and meetings.
- Held a roundtable discussion with senior representative from 10 landlords.

We received direct resident responses and representative feedback from Tpas and Taroe, as well as responses from the key trade bodies representing housing associations, retained council housing and arm's-length management organisations

We received 55 responses in total - 45 responded to the questions via the online survey and 10 by email.

Of the responses received:

- 43 were from individual landlords
- 4 were from individual residents
- 2 were from resident organisations – Tpas and Taroe
- 10 were from other organisations – G15, NHF, CIH, Nat Fed of ALMOs, ARCH, Northern Housing Consortium, Shelter, Society of Licensed Conveyancers, NPRAS Housing Aid (Nottingham Private Rented Assistance Scheme), HouseMark

*Note: these don't add up to the overall numbers as some landlords provided a written response and attended the roundtable discussion*

Both resident bodies (Tpas and Taroe) were fully supportive of our plans and agreed that they focused on the correct areas. The trade bodies' responses were all supportive of the proposals and strongly agreed that our plans focused on the right areas. They recognised that we needed additional resources to implement the plans and deal with the increasing demand for our service, and that this was reflected in the subscription fee increase. They also welcomed our new approach of capping the fee for two years.

The landlords that responded cover just over a million households between them, which is equal to 20% of the total units registered with us.

See Annex A for the list of those who responded.

## Summary of responses

The consultation set out five questions, all open ended and inviting comments.

A summary of the responses to each question is set out below, highlighting the main comments received.

### **Q1 Do you have any comments on our performance indicators and whether these achieve a good balance between timeliness, quality, customer feedback and impact?**

- There was a positive response with lots of support for our proposals set out in this section. The majority of respondents said they were the right areas for us to focus on and good balance achieved
- The proposal on reducing average case times over the next two years was welcomed by nearly every respondent saying it will benefit residents and landlords. Some commented that it should not be to the detriment of quality; quality is more important than speed
- Many commented that they would welcome complaint handling best practice and more sector development tools
- On some points – the new KPI on casework quality and publishing individual landlord performance data and all determinations – a number of respondents were keen to see more detail

## **Q2 Do you have any thoughts on how else we can support more complaints to be resolved earlier?**

- Most respondents commented that resolving complaints while in the landlord's process is the best approach and they would welcome our insights from our local resolution work to support that. They were keen to learn from when things go wrong, and more sharing of best practice and learning outcomes to drive up standards for all landlords would be welcome
- Some mentioned that they were not clear what our role is at this stage; some landlords were unsure about our involvement
- Several respondents said we should not raise resident expectations that we will deal with their complaints while they are in the landlord's complaints process. A few suggested that more information and resources on the website to support residents at this stage would be helpful and help manage expectations – particularly on what is a realistic outcome
- Some landlords said they have engaged positively with our early resolution process and view it as an important part of our process although a few said there can be some inconsistencies in how it is applied

## **Q3 Do you have any comments on our proposed approach to formal resolution, in particular the provision of information to us?**

- Most respondents welcomed our aim to achieve faster determinations and there was widespread agreement to have a timescale on the provision of information to us. Most thought 15 working days was reasonable, some said it should be 20 working days. There were many comments that some flexibility is needed eg on particularly complex cases. They would want to be able to extend the timescale in those circumstances in consultation with us
- Encouraging resolution through mediation was welcomed by quite a few respondents; some had a concern about cost
- There was strong support for triaging. It was seen as a sensible approach by most respondents, with some adding that more detail on how it would work would be helpful
- Many welcomed the opportunity for decisions to be explained to the parties before issuing determinations; it will improve the process for both landlords and residents
- On systemic issues, landlords want us to work with them; CEOs want to be involved as early as possible and not just at the point when something is escalated to the Regulator

## **Q4 Do you have any comments on strengthening our sector development and engagement activities?**

- Our proposals to strengthen this area were seen as positive; the current tools were helpful, but more engagement and sharing learning would be welcome.
- Many said publishing landlord data would be very helpful for benchmarking, but it should include contextual information

- Some said it should be more often than annually – a number suggested quarterly, plus more ongoing feedback such as on the timeliness and quality of information they provide and patterns of complaints
- On working with landlords with higher complaint volumes, some said it was not necessarily an indicator of underperformance and should be focused on issues with complaint handling; others welcomed it

#### **Q5 Do you have any comments on the business plan overall?**

- Overall, there was strong agreement on the service improvements proposed and they were seen as positive. Several comments received, including at the roundtable discussion, about having seen improvements in our service over the last 18 months, and looking forward to seeing further improvements in performance
- Many agreed that we need to be better resourced and understood the need for the fee to increase in order to do the positive things proposed
- Some specific comments on the fee were:
  - a few said the fee increase was high based on the number of complaints the Ombudsman receives about them and that we needed to clearly show how our budget is used and the value for money
  - some said that we should consider a different fee structure to the current flat rate – suggestions included a reduction for good performers, minimum fee and then tiered based on level of complaints
  - a couple commented that part or all of the cost should come from government grant
  - a resident commented it was good value for money.

## Annex A

### List of respondents

#### From or on behalf of residents

- We received responses from four individual residents
- Tpas
- Taroe Trust

#### Trade bodies and other organisations

- G15
- NHF
- CIH
- Shelter
- ARCH
- Nat Fed of ALMOs
- HouseMark
- Society of Licensed Conveyancers
- NPRAS Housing Aid

#### Individual landlords

A2Dominion Housing Group  
Barnet Homes  
Basildon Borough Council  
Believe Housing  
Birmingham City Council  
Broadland Housing Group  
Citizen  
Clarion Housing Group  
Colchester Borough Council  
Curo  
Exeter City Council  
Gateshead Council  
Gentoo  
Grand Union Housing Group  
Greatwell Homes  
Homes in Sedgemoor  
Innisfree  
Karbon Homes  
Knowsley Housing Trust  
London & Quadrant  
London Borough of Hackney  
Metropolitan Thames Valley  
Midland Heart  
Nottingham City Homes

Ocean Housing  
Onward Homes  
Paradigm Housing Group  
Peabody  
Places for People  
Poole Housing Partnership Ltd  
Poplar HARCA  
Riverside Group  
Sheffield City Council  
Six Town Housing  
Southwark Council  
Stockport Homes Group  
Stonewater  
Tower Hamlets Homes  
Wandsworth Council  
WDH  
West Kent Housing Association  
Wrekin Housing Group