

**Consultation on our
Corporate Plan 2022-25 and
Business Plan 2022-23**

October 2021

**Using our values to deliver an
independent, visible and proactive
Ombudsman**

What we do

Our role

The Housing Ombudsman makes the final decision on disputes between residents and member landlords. Our decisions are independent, impartial and fair.

We also support effective landlord-tenant dispute resolution by others, including landlords themselves, and promote positive change in the housing sector.



Our service is free to the 4.7 million households eligible to use it.

Our role is set out in the Housing Act 1996 and the Housing Ombudsman Scheme approved by the Secretary of State.

Our membership

Membership of the Scheme is compulsory for social landlords - primarily housing associations who are or have been registered with the Regulator of Social Housing and local authority landlords. Additionally, some private landlords are voluntary members.

Membership as at 31 March 2021

	2,316 member landlords		4.7m households
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1,916 housing associations	329 local authorities	71 voluntary members
3m households	1.6m households	30k households

The Scheme is funded by subscriptions from members and is paid on a per housing unit basis.

Our vision, values and process

Our vision

Improving residents' lives and landlords' services through housing complaints

Our values

► **Fairness:**

We are independent and impartial; we take time to listen carefully and to understand the evidence

► **Learning:**

We share knowledge and insights to maximise our impact and improve services

► **Openness:**

We are accessible and accountable; we publish information on our performance and decisions

► **Excellence:**

We work together to provide an efficient, high-quality service

Our process

Dispute support



We support the resolution of complaints while they are within the landlord's complaints process

Dispute resolution



We make the final decision on complaints that remain unresolved through independent, impartial and fair investigation

Our performance during the first two years of the current corporate plan:



We dealt with 32,169 complaints and enquiries



We determined 4,323 cases in our formal remit



100% of cases determined within 12 months



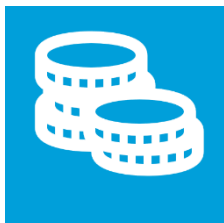
We continued to reduce our average case time on determinations



98% of orders implemented by landlords within three months



Residents benefited from 6,072 orders and recommendations



We ordered landlords to pay a total of £735k compensation



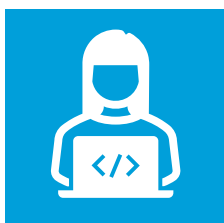
We issued a new Complaint Handling Code and updated our Scheme



92% of residents on our Panel found our complaint decisions helpful



We issued four thematic reports



171 landlords changed their policies as a result of the Complaint Handling Code



We started publishing all decision reports and 750 landlord performance reports

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How to respond

This consultation sets out four strategic objectives with an introduction to each plus our priorities over the three years and the key activities for year one. There are questions at the end of each section asking for your views and any comments. The final section focuses on our subscription fee proposal across the three years and asks for your views.

You can respond to the questions [online here](#) which is the preferred method of response but for the details of our plans you will need to read this document first. If you wish to respond by email please send your feedback to consultations@housing-ombudsman.org.uk

The consultation is open until 5pm on Friday 12 November 2021.

Thank you for participating.

For more information about our role and how we work see our website at www.housing-ombudsman.org.uk

Foreword

This corporate plan comes at a period of significant change for the social housing sector and the Housing Ombudsman. This is reflected in the surge of casework both landlords and we are experiencing, which is unprecedented in our 25-year history as a service.

The reasons for this extend beyond a repairs backlog because of Covid-19. Future policy changes to improve access to complaints and the impact of building safety are likely to sustain higher volumes of casework. The increase also reinforces the changing role and importance of complaint handling itself, which should be an absolutely integral part of a healthy resident-landlord relationship and service development.

So this plan aims to do two things. It seeks to respond to the increase in complaints that landlords are experiencing which are subsequently flowing through to us; and it sets out ways we will work across the sector to strengthen complaint handling at a local level, sharing learning to improve services and potentially prevent complaints.

We set some ambitious goals for the next three years, reflecting how our role has changed significantly and rapidly since we adopted our revised Scheme last year. It is built around our four values – fairness, learning, openness and excellence. These values express the essence of our work as an independent Ombudsman, promoting fairness, accountability and transparency.

It reflects how an Ombudsman is quite different to the courts and the wider regulatory ecosystem around social landlords. Our approach is inquisitorial and based on fairness. Crucially, our decisions will often contain important learning for the landlord around the substantive issue, which could improve landlord performance and resident experiences.

The plan aims to significantly increase awareness and understanding of our role, to improve access to the Ombudsman and reach people who may need the complaint system but face barriers accessing it. It will develop our approach to investigation to reflect the increasingly complex nature of the problems we are seeing. The plan will evolve our approach to mediation, in an effort to strengthen resident and landlord relationships, and take a proactive approach to improving landlords' complaint handling to support earlier, local resolution. It will also encourage landlords to close the gap between individual decisions and organisational lessons, by evolving our systemic work and launching a new Centre for Learning. This plan also supports improvements to our service through digitisation and colleague development. And by developing our work on diversity and inclusion, we can also show that our staff are representative of the population they serve.

Inevitably the rise in demand has led us to review our resources. Whilst we have been able to respond effectively so far, we will require more resources to sustain quality and reduced investigation times. Having adequate resources is also integral to our independence as an Ombudsman and ability to fulfil our duties. This plan therefore proposes a revised cap to our subscription rate and we will advise the fee

needed to deliver our planned work and targets, which will reflect any changes in demand, in our annual business plan consultations. The issues we are seeing in complaint handling affect the breadth of our membership. Only by improving complaint handling at a local level will we see lower demand for our service; we hope our emphasis in this plan on supporting landlords to resolve more complaints themselves will help to achieve this over time.

This period of change will continue with the implementation of the Social Housing White Paper, and government is also considering redress in the wider housing market, particularly the private rented sector. We will work with government to inform the development of policy, particularly with regard to our powers.

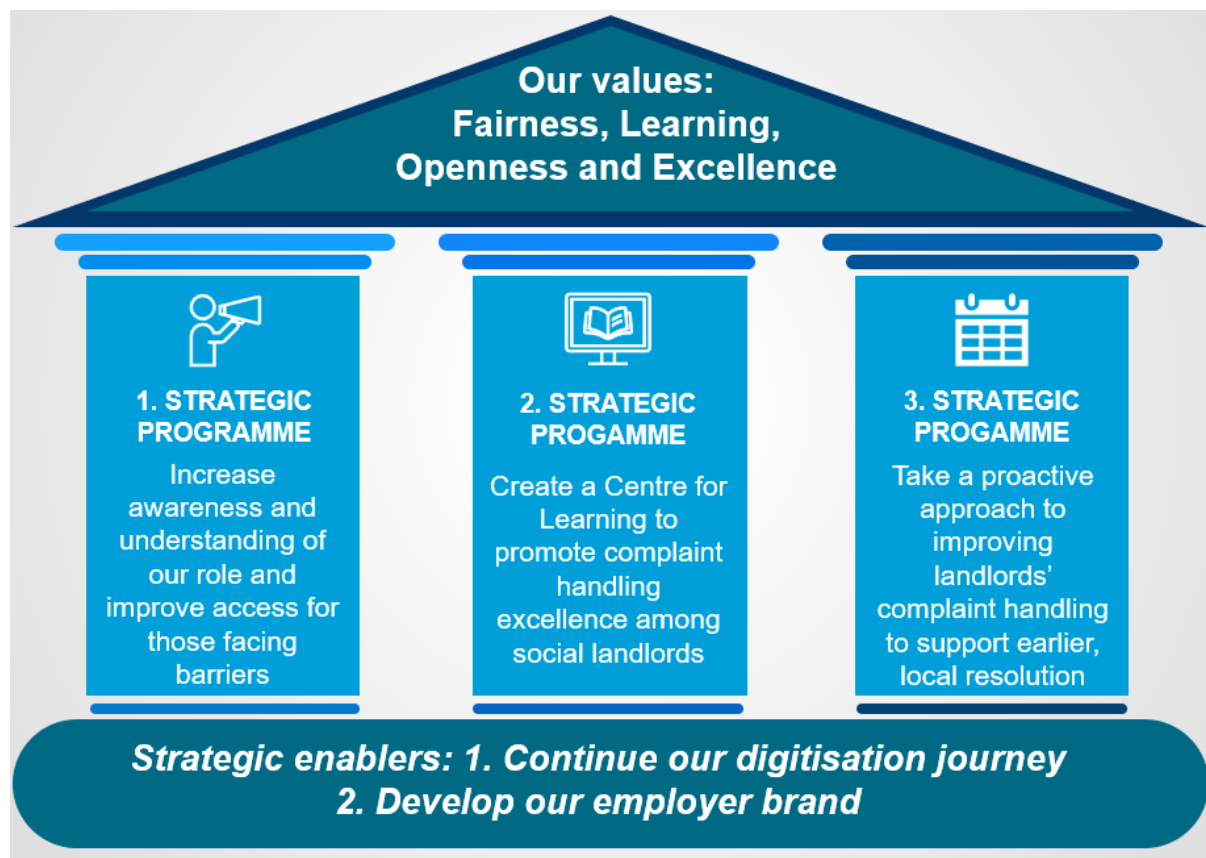
We would like to thank the Resident Panel and many landlords from around the country who engaged with us as we developed our plan.

We believe social housing is a unique sector deserving an independent, proactive and visible Ombudsman to support it. We believe this values-driven plan delivers that.

Richard Blakeway
Housing Ombudsman

Overview

Within our values-driven plan for this three-year period are three innovative, strategic programmes of work that will see us offer more to improve residents' lives and landlords' services, and two enabling programmes that will allow us to be efficient, effective and to continuously improve.



The first innovative programme is to increase our awareness raising activities and build trust in our service so that more residents come to us when they remain dissatisfied at the end of their landlord's complaint handling process. A key part of this programme will be to promote a full understanding of the Ombudsman role. We will also seek new and innovative ways for our message to reach all residents.

Our second innovative programme is to build a 'Centre for Learning' to promote complaint handling excellence amongst social landlords by using insight from our casework, data and intelligence. This will create a platform to share best practice, provide e-learning and facilitate peer-to-peer learning across our diverse membership.

And the third is to position our dispute support function more strategically by building on the Complaint Handling Code to use intelligence from Complaint Handling Failure Orders and information from other sources to identify and support landlords to improve their complaint handling for the benefit of all residents. This will also include

promoting earlier, local resolution of complaints through an enhanced enquiries service to provide more advice up-front, backed up with more tools to help residents make or progress their complaint to prevent issues from becoming entrenched. We will continue to support individual cases where we consider there is a need.

The first of our two enabling programmes is to continue our digitisation journey. This will include enabling online complaint handling with real time updates on complaints for landlords and residents who want to interact with our service in this way, but will not be at the expense of other routes into the service. This programme will also look to increase the efficiency of our back-office services and will enable us to become a data-driven organisation.

Our second strategic enabler is to develop our employer brand so that we attract and retain the best staff, and that we then invest in their skills development so we continue to provide a high quality service that continuously improves. Under this programme, we will also develop our approach to corporate social responsibility and enhance our work on diversity and inclusion.

Strategic Objective 1: Extending fairness

The Housing Ombudsman is an advocate for fairness rather than an advocate for residents or landlords. The principle of fairness is the basis of all of our work. Our work should operate at an organisational level for landlords, either to improve complaint handling or to prevent the substantive failure being repeated. Over this corporate plan we will look to extend the reach of the fair outcomes our work delivers by elevating our interventions so they can benefit all residents and landlords, not just those who have brought a complaint to us. We will do this through our three operational pillars of: dispute support; dispute resolution; and systemic learning. This approach will help landlords manage increases in complaints by supporting local resolution and addressing factors which may be driving higher volumes.

We will also seek to deepen and broaden access to fairness for all. First, we will gather evidence to support the review of our powers set out in the Social Housing White Paper. And second, we will look to expand our voluntary membership in a steady and sustainable way to provide redress where there may be gaps, particularly in the private rental market.

Through a strategic, intelligence-led approach to dispute support

A unique part of our remit as an Ombudsman is our work in dispute support. Here we empower landlords and residents to resolve their disputes earlier and while the complaint is within the landlord's process. This is critical given the higher volumes of complaints landlords are experiencing and the potential for this increase to be sustained.

It is an important principle that landlords are given the opportunity to respond to a complaint before we investigate so whilst we do not investigate or offer remedies at this stage, we do offer advice to residents who are unaware or unsure about the complaints procedure. And if there is evidence that the landlord is not progressing a complaint we intervene to ensure they do, using our powers under the Complaint Handling Code.

This work has traditionally operated at individual complaint level but the introduction of the Code enables a shift to more strategic interventions, using intelligence from Complaint Handling Failure Orders, alongside other quantitative and qualitative information to identify landlords where complaint handling could be improved. We will then work with these landlords using jointly agreed, time-limited action plans to support complaint handling performance improvements for the benefit of all residents, thus ensuring our resources have the most impact. This should help to reduce the demand for formal investigations into unresolved disputes with landlords and provide valuable insight for our wider learning activities across the sector.

We have experienced significantly increased demand for our work in dispute support since January 2021 and we expect this to continue to grow throughout the period of this corporate plan. In response, we want to deliver an enhanced enquiries service as this is the first point of contact by residents with our service. This will support earlier resolution by providing more advice and guidance for residents up-front and

empower them further through a range of self-service tools to support them through making and progressing a complaint with their landlord. This approach will help to prevent issues becoming entrenched and strengthen resident and landlord relationships. We will also continue to provide direct assistance where it is needed, including with the most vulnerable residents.

We also recognise there are benefits to all residents in being able to access independent advice whilst their landlord is considering their complaint. Our dispute support service focuses on improving accessibility and responsiveness in landlord complaint handling; it is important we remain impartial on the substantive issues that have led to complaints as we may ultimately investigate these. There are many excellent advice services available but their resources are often stretched, so we will explore how we could support an increase in the provision of advice and advocacy by others through partnering with other organisations and resident-to-resident support whilst complaints are still within the landlord's process.

Together, this work forms one of our major, innovative programmes for our 2022-25 corporate plan.

Through strengthening the framework for Ombudsman's investigations

When we investigate a formal complaint, we determine what was 'fair in all the circumstances' using an inquisitorial approach. This means we are not limited to the issue(s) raised by the resident in their complaint, nor the evidence they have submitted. This approach also recognises and addresses the inherent power imbalance between residents and landlords and can rebuild or strengthen that relationship, unlike an adversarial legal process. This also means our decisions are not bound by precedent, but we will consider policy, guidance, legislation, regulation and accepted good practice to determine whether there has been maladministration by a landlord.

Consequently, our findings may have organisational significance; if a landlord has a positive complaint handling culture it will consider the lessons learned from our investigations and see if these could be applied more widely for the benefit of all residents, for example, by reviewing a policy, improving a system, or training staff. This proactive approach by landlords extends fairness to all residents and helps to strengthen their landlord-resident relationships. Increasingly our investigations are identifying ways in which landlords could improve their approach to prevent potentially recurring issues.

Over this corporate plan, we will strengthen our inquisitorial approach to ensure our investigations have a wider impact for the benefit of all residents – encouraging all landlords towards a more positive complaint handling culture. We will do this by reviewing our approach to orders, recommendations and compliance to ensure organisational learning from outcomes is achieved, and our remedies to ensure they fully account for the severity of detriment where we find maladministration. We will also consider the impact of changes to government policy (such as the review of the Decent Homes standard) and consumer regulatory standards to inform our decision-making.

We also want to expand the routes to resolution we offer. The longevity of the landlord-resident relationship in the social housing sector is unique. When something goes wrong and trust breaks down, it can be very difficult to restore and lead to much negative emotion on both sides. We believe one way of addressing this is through targeted mediation, aimed at cases where the relationship has been damaged and working to restore this for the benefit of both sides. This will be an enhancement to our existing offer and we will trial this on anti-social behaviour cases or those where a number of parties beyond the resident and landlord need to be involved to resolve a complaint. Mediation is a voluntary approach for both the resident and landlord and we undertake full investigations where our assessment indicates that is required. We will also look at other forms of alternative dispute resolution which do not require full mediation, and whether we should refer complaints back to landlords to resolve more frequently where this should resolve the complaint and improve their complaint handling to the benefit of all residents.

Finally, to provide overarching assurance and confidence to us, to landlords and to residents on the quality of our inquisitorial approach as we enhance our framework for Ombudsman investigations and extend fairness to all, we will also introduce a 'third line of defence' Quality Board, which will include independent, external representatives. And given the breadth and depth of casework, we will develop our casework liaison with higher volume landlords, a more formal approach to caseworker specialisms and introduce a highly complex casework category.

Through enhanced thematic insights

Complaints are a window into the performance, service and culture of an organisation. A pattern from our casework may indicate an issue for an individual landlord or a collective challenge for the social housing sector; our work here helps to identify root causes and to promote learning. This means fairness derived from individual complaints is extended sector-wide and to the benefit of all residents.

During this corporate plan, we will continue to work in line with our systemic framework, enhancing the extension of fairness by producing a strategic series of thematic spotlight reports that build into an overall picture on the quality of residents' homes and experience of living in social housing. Evidence for these investigations will be supplemented by wider intelligence to better understand root-causes with the reports focussing on the transparency, accountability and fairness of landlords' policies and approach to put the resident experience at the heart of our work. Recommendations will cover both complaints management and service improvements and each report will be accompanied by a learning package to maximise engagement in the findings and adoption of the recommendations.

We will also revisit thematic report recommendations periodically to see how the sector is progressing and what remains to be done. And we will develop a range of shorter, more responsive publications to address emerging issues in an agile way. This work will be published throughout the year between in-depth reports.

We will also start systemic investigations into landlord complaint handling where we have concerns that cannot be addressed through Dispute Support. Since the

publication of the Complaint Handling Code, we have been building up a picture of engagement and compliance which will inform our investigations into individual landlord's complaint handling.

Whilst the issues we report on may not be sufficient for regulatory intervention or confined to regulatory standards, we will continue to work with the Regulator of Social Housing and the proposed Building Safety Regulator to share insight and, where appropriate, refer cases.

Through supporting the review into extending our powers

The Social Housing White Paper committed to keeping our powers under review and considering ways to strengthen them, for example, by putting our Complaint Handling Code on a statutory footing. While many landlords do follow our recommendations, advice and guidance, having more weight behind these would ensure fairness is extended to more residents.

As well as exploring mandatory compliance with our Code, we will build an evidence base to understand if increased powers over awareness raising and accessibility to the Ombudsman, as well as putting remedies from systemic investigations into individual landlords on the same footing as those from complaints, would be beneficial.

Through our growing our membership and closing gaps in redress

Since our service was established under the Housing Act 1996, the boundaries between social and private rented provision have become blurred, interconnected and complex. As a result, there are long-standing concerns over the ability of all residents to access housing redress and the confusion caused in finding the right route. This affects our service with around 25 per cent of enquiries being signposted elsewhere and 10 per cent of our investigations being wholly outside of our jurisdiction each year.

In early engagement on this draft corporate plan, there was a clear and consistent message from landlords and our Resident Panel that our service has a positive role to play in improving the experience and housing conditions of private tenants and other residents. We agree and firmly believe fairness should be extended to more residents so they can benefit from the better redress outcomes that an Ombudsman provides.

An area where we can do this without the need for policy or legislation is by increasing the number of voluntary landlords who join our scheme. There are already around 70 voluntary members of our Scheme, representing around 30,000 homes, with provision ranging from purpose-built private rent to housing for residents with care needs. Being a voluntary member is a positive statement about the quality and fairness of redress offered to the landlord's tenants. We will revise our voluntary member strategy and look to grow this part of our service in a steady and sustainable way, targeting landlords who are most similar in culture to our mandatory members and who operate at scale first.

We also welcome the Government's work to review redress in the wider housing market, including a White Paper on the private rented sector, and during this corporate plan we want to work with government on our jurisdiction to help close gaps in redress and improve the customer journey. As government policy develops, we will consider our role in more depth through future business plan consultations and consider the impact on our Scheme.

The New Homes Ombudsman is one such move which will close gaps in redress for recent purchasers of new homes where access to redress through an existing redress provider is not available. For our member landlords, this means the Housing Ombudsman can consider complaints from residents of social landlords, including shared owners and leaseholders. We will work with the New Homes Ombudsman on a memorandum of understanding which will be a requirement of the legislation. We will also consider complaints which may relate to building safety and work closely with the Building Safety Regulator as it comes into effect.

For strategic objective 1: extending fairness, the priorities and outcomes that we wish to achieve over this corporate plan are summarised in the table:

Strategic priorities	Outcomes achieved
1.1. Strategic, intelligence-led approach to dispute support	<ul style="list-style-type: none"> • Targeted landlord support to improve complaint handling for all residents • Residents and landlords are empowered to resolve complaints earlier and locally
1.2. Strengthening the framework for the Ombudsman investigations	<ul style="list-style-type: none"> • Learning from individual cases benefits all residents • Routes to redress are effective and appropriate, potentially rebuilding the landlord-resident relationship • Developing our remedies, orders and recommendations to ensure our decisions maintain impact • Specialisms based around issues enhance our inquisitorial approach • Quality Board with external members provides assurance over our approach
1.3. Enhanced thematic insights	<ul style="list-style-type: none"> • Our Spotlight reports build a picture of the quality of residents' homes • Other publications respond to issues or themes as they arise
1.4. Supporting the review into extending our powers	<ul style="list-style-type: none"> • We have a picture of where increased powers would benefit residents
1.5. Growing our membership and closing gaps in redress	<ul style="list-style-type: none"> • Strategic expansion of voluntary members

	<ul style="list-style-type: none"> • Inform government policy to reduce complexity and close gaps for residents
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The key activities that will support this plan in year one will be to:

1.1. Strategic, intelligence-led approach to dispute support

- Explore how we can support others providing advice to residents
- Understand what tools residents need from us to help make and progress complaints with their landlord. Start to develop these
- Develop a strategy for intelligence-led landlord interventions to support more effective complaint handling
- Build data and intelligence analysis to support landlord interventions
- Review our current enquiries service and begin to build the advice offered at this stage

1.2. Strengthening the framework for the Ombudsman's investigations

- Review our orders and recommendations, compliance and remedies policies and guidance
- Explore other routes to redress and begin to trial these
- Develop the liaison approach with landlords with higher volumes of investigations
- Design and start to build a more formal approach to casework specialisms based around issues, categories and case complexity
- Set terms of reference for the Quality Board, recruit independent members

1.3. Enhanced thematic insights

- Continue to deliver our Spotlight reports and associated learning packages. Set out the planned topics at the start of the year
- Develop our range of short, responsive publications as issues arise in-year
- Build and maintain our relationships with regulators

1.4. Supporting the review into extending our powers

- Set the evidence base to support the review into an expansion of our powers.

1.5. Growing our membership and closing gaps in redress

- Develop a voluntary members strategy
- Engage with government to discuss the future of redress in the housing market
- Subject to legislation:
 - Develop an MoU with the New Homes Ombudsman
 - Develop an MoU with the Building Safety Regulator
 - Develop a statutory MoU with Regulator of Social Housing

Q. Do you agree with Strategic objective 1: Extending Fairness and the priorities? [Yes/No]

Comments:

Q. Do you agree with the key activities in year one? [Yes/No]

Comments:

Q. Is anything missing or are there any observations you would like to make?

Strategic Objective 2: Encouraging learning

Encouraging learning from complaints is an essential function for any Ombudsman. In a sector where residents have limited choice over their landlord, learning from events where something has gone wrong and providing effective complaints handling is essential to preserve both parties' ongoing relationship. It is also an effective way to prevent complaints escalating, as is increasingly the case at present.

A positive complaint handling culture in member landlords is an essential bedrock and that is why we want to develop our learning resources and embed our Code with landlords. Although compliance with our individual decisions is high and we have significantly increased the volume of learning tools provided over the current corporate plan period, there is much more we can do. This is area of our work that many landlords have asked us to expand.

We intend to reshape our sector development and engagement offer to maximise its learning impact, ensuring it reaches as many members as possible. This approach will add value to all landlords and residents, regardless of whether we have dealt with a complaint during the year. It will be tailored for different landlord types, sizes and locations. Everyone working for a landlord should feel able to contribute to a positive complaint handling culture so our work will engage people performing different roles, whether board members or front-line operatives. We will also extend our engagement with residents in our learning work, so they can see the difference complaints can make and consider whether their landlord is demonstrating learning from complaints. Our work here will be targeted in two main areas:

Through a Centre for Learning

Our first initiative is to build on the positive impact of our Complaint Handling Code to create a facility that champions learning from complaints handling amongst social landlords. This will be called the 'Centre for Learning' and is another of our key strategic programmes. This improved and integrated offer will bring our casework, publications and sector development tools into a single portal. It will also provide us with valuable feedback and intelligence which will inform our work at Dispute Support and our thematic Spotlight reports.

The Centre for Learning content will take a variety of formats, differentiate the audience and be subject to periodic review to ensure it remains relevant. This approach will align with the periods during the year when landlords are more likely to experience increases in particular categories of complaint, for example heating in winter and service charges in the spring. Webinars will cover a wide range of topics together with a regular series of podcasts. We will develop forums based on region and landlord type and consider annual events. We will review our e-learning offer and develop differentiated complaints handling modules for landlord staff dependent on their role, alongside guidance covering a range of topical issues. We will also provide a platform for landlords to share ideas and learn from each other, as well as seek to partner with existing networks and membership bodies to maximise accessibility to our learning. There will be a strong focus on promoting our casebook which, over the lifetime of this corporate plan, will expand to thousands of cases.

We will also increase our work with councillors and governing bodies as these groups are best able to influence organisational culture, to push it towards a positive approach to complaints by providing opportunities to ensure learning is applied across the landlord from our decisions and our wider work. To help councillors and members of governing bodies in this endeavour we will produce a range of tools to support them.

We know from our Resident Panel and wider engagement that residents want to see that complaints are making a difference and are interested in our learning work. We will also engage residents in our learning work, as we have done with recent Spotlight reports, and residents can consider their landlords approach to the service provision.

We will actively promote the Centre for Learning to drive engagement. It will provide us with feedback on what landlords find useful and inform our wider thematic work.

Driving a positive complaints culture

Our second area of focus will be to drive a positive complaints culture within social housing by embedding our Code's status as the standard for handling complaints and reporting on landlord performance against the Code. We will produce an annual review into complaints handling across social housing. This would provide learning and insight for all members into the common reasons for maladministration during the year, highlight any good practice, identify where complaints handling could be improved and outline what we foresee as the coming challenges. Annual surveys will incorporate landlord views and the resident voice will come through our Resident Panel.

We will also identify issues we are not seeing in our complaints, despite indicators suggesting there are issues, and any resident demographic which is not reaching us together with good practice or concerns arising from our examination of landlord self-assessments. Each year, this will be accompanied by the publication of our landlord performance reports and, altogether, will provide an opportunity particularly for governing bodies to consider their organisation's overall complaint handling performance and learn how it could be improved.

For strategic objective 2: encouraging learning, the priorities and outcomes that we wish to achieve over this corporate plan are summarised in the table:

Strategic priorities	Outcomes achieved
2.1. Establish a Centre for Learning	<ul style="list-style-type: none"> An integrated offer to landlords providing a range of resources that are differentiated by role and landlord type to improve the sector's complaint handling
2.2. Driving a positive complaints culture	<ul style="list-style-type: none"> Landlords and residents can understand each member's performance based on the complaints we have investigated

	<ul style="list-style-type: none"> • Landlord governing bodies are better enabled in holding their organisation to account for its complaints handling • Landlords are aware of current and future challenges • Landlords can consider if any groups or complaint types face barriers in accessing or progressing through their complaints procedure
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The key activities that will support this plan in year one will be to:

2.1. Establish a Centre for Learning

- Establish landlord learning needs for the Centre for Learning based on insight from Dispute Support and Resolution
- Design and start to build the technical requirements for the Centre for Learning
- Begin to deliver content for the Centre for Learning, including for councillors, governing bodies and tenant panels

2.2. Driving a positive complaints culture

- Undertake separate landlord and resident attitudinal surveys
- Produce annual landlord performance reports
- Produce the annual review of complaints handling in social housing

Q. Do you agree with Strategic objective 2: Encouraging Learning and the priorities? [Yes/No]

Comments:

Q. Do you agree with the key activities in year one? [Yes/No]

Comments:

Q. Is anything missing or are there any observations you would like to make?

Strategic Objective 3: Increasing openness

Our service has never been more open and transparent. During our current corporate plan we have published the Ombudsman's decisions, annual landlord performance reports and our policies and guidance. Being open promotes accountability, learning and, above all, awareness of the difference complaints can make.

The increased demand for our service suggests there is increased awareness, but a challenge that remains is ensuring that all residents share this awareness, understand the benefits alternative dispute resolution can bring and are willing to access us when they have an issue. It is also important residents are able to access the complaints process instead of considering more costly and adversarial alternatives, such as the courts. Work in this area is another of our key strategic programmes that will take place throughout this corporate plan and will be supported through collaboration with partners.

Another area that will promote openness is the proposal, outlined in the Social Housing White Paper, for an Access to Information Scheme. This will allow housing association tenants to request information on housing management from their landlord. We will act as the appeals service for this Scheme and development of this will take place during the three years covered by this corporate plan.

Through raising awareness and building understanding

Too often we have not been contacted by social housing residents whose complaints about their homes are reported in the national and local media and they are pursuing a legal route to resolution. This may indicate both a lack of awareness of our service and a lack of knowledge of alternative routes to resolution such as an Ombudsman which is independent, free for residents to use and less adversarial, potentially restoring their relationship with their landlord and achieving benefits for their wider community. We want to address this trend by undertaking a step change in raising awareness and building understanding of our role for both residents and landlords. We see this work as benefitting both residents and landlords, and raising awareness as a joint endeavour. During the preparation of this plan, our Resident Panel strongly encouraged more work in this area. Consequently, awareness raising is another of our key innovative programmes of work.

There are a number of strands to our plans across the three years in this area. In terms of awareness raising, we will build on the requirements in the Complaint Handling Code with stronger expectations on landlords to raise awareness of their own complaints handling procedures and our service, testing this through a revised self-assessment and issuing Complaint Handling Failure Orders where access is being undermined. Alongside this, we will provide more tools for landlords and residents to use in promoting our service, for example, downloadable leaflets and posters. We will also work with government and others to improve visibility. And we will promote our service ourselves, raising and sustaining awareness of the Ombudsman through increased stakeholder engagement and ambitious communications plans for our publications to maximise publicity opportunities such

as regional and national coverage, development of a resident newsletter and participation in relevant events and awareness activities.

The next strand aims to promote greater understanding of our role amongst residents and build trust in our work. We will produce leaflets and other publications to set out how we work and the benefits that this can bring, including case examples and resident quotes where possible. We will also look at our communications to ensure they are clear, straightforward and free of jargon. And we will seek to demystify the Ombudsman and our processes, showing that our staff are representative of the population they serve and that accessing our service is simple and straight-forward. We would like to work in partnership with landlords and residents in then distributing this message to all residents.

We also want to ensure our message is heard by hard-to-reach groups and this is the final strand in our work here. We will take a targeted approach where we believe there are demographic or geographic groups facing barriers to accessing complaints or our service. This includes residents who may not have access to the internet, where English may not be their first language, or they may have low literacy. We will examine our data to identify any under-represented groups and identify specific actions to improve accessibility for these residents including outreach work and potentially a thematic or systemic investigation. In addition, we will examine if there are any complaint types where volumes appear low and whether any landlords are consistently not progressing complaints effectively. Where issues are identified, we will investigate further and take any necessary action, including issuing Complaint Handling Failure Orders.

Through collaboration with partners

Working collaboratively with partner organisations will increase the reach of our messages on awareness and understanding of our service. Therefore, we will develop and expand our engagement with key national and local advice agencies, the First Tier Tribunal and other stakeholder bodies to improve their signposting to us.

We will also seek to build awareness amongst common resident advocates, for example, Members of Parliament, local councillors, and resident groups through specific communications and relationship building with their representative groups, for example, the Local Government Association. The proposed removal of the 'designated person' filter is key opportunity to raise awareness and direct engagement with our service amongst these groups.

Through the Access to Information Scheme appeals service

We will continue to work with the Department for Levelling Up, Housing and Communities (DLUHC) to deliver the Access to Information Scheme appeals service throughout this corporate plan. While progress will be dependent on statutory and regulatory change, we are currently planning for the scheme to commence during the period of this corporate plan.

For strategic objective 3: increasing openness, the priorities and outcomes that we wish to achieve over this corporate plan are summarised in the table:

Strategic priorities	Outcomes achieved
3.1. Raise awareness of our service, build understanding and access hard-to-reach groups	<ul style="list-style-type: none"> • More residents are aware of our service, understand the benefits of alternative dispute resolution and access our service when they remain dissatisfied • Awareness of and access to landlords' complaints procedures and the Ombudsman amongst hard-to-reach groups is improved
3.2. Work collaboratively with partner organisations	<ul style="list-style-type: none"> • Improved signposting to our service
3.3. Prepare for go-live of the Access to Information Scheme appeals service	<ul style="list-style-type: none"> • Appeals under the Access to Information Scheme are delivered on time and in a fair way

The key activities that will support this plan in year one will be to:

3.1. Raise awareness of our service, build understanding and access hard-to-reach groups

- Enhance awareness raising requirements in the Complaint Handling Code and incorporate these into the self-assessment checklist
- Develop more communication tools for landlords and residents to use to raise awareness of our service
- Develop a strategy for Ombudsman-led awareness raising activity
- Strengthen our stakeholder engagement and communication plans for key publications
- Develop publications to explain the role of the Ombudsman and the benefits that this brings
- Begin to review all of our communications to ensure these are clear, build trust in the service and our staff, and ensure residents can navigate our process
- Understand which resident demographic and geographic groups are not accessing our service

3.2. Work collaboratively with partner organisations

- Start to develop strategic relationships with key partners and resident advocates to raise awareness and improve signposting

3.3. Prepare for go-live of the Access to Information Scheme appeals service

- Continue to work with DLUHC to plan the Access to Information Scheme appeals service

Q. Do you agree with Strategic objective 3: Increasing Openness and the priorities? [Yes/No]

Comments:

Q. Do you agree with the key activities in year one? [Yes/No]

Comments:

Q. Is anything missing or are there any observations you would like to make?

Strategic Objective 4: Achieving excellence

We want to provide an excellent service that meets our residents' and landlords' needs. The changes we have made to our service during our current corporate plan period to make it more effective and efficient have helped us to respond to rising demand. Whilst we will require additional resources to effectively manage the substantial rise in casework, we will continue to drive efficiency and effectiveness through continuous improvement. Our next steps in this journey over the corporate plan are set out in our two key strategic enabling projects, which will also reflect on our experiences during Covid-19. These are developing our employer brand and delivering our digital strategy.

Through building our employer brand

We want to attract and retain the best people; doing so will ensure we can continuously improve through new skills and experience, and help us to achieve excellence. Our colleagues already have a wealth of talent so we will look to maximise their potential by developing a cross-organisational academy to support learning and development. This will include exploring the potential for accreditation programmes for caseworkers which will not only benefit our staff but also residents and landlords in terms of the knowledge and expertise applied to their complaints.

We will also enhance our recruitment so we continue to recruit people with real talent and a desire to make a difference in the housing sector. We will do this by developing our employer value proposition, including career pathways and hybrid working, and promoting and embedding this in our recruitment activities.

A key supporting strand across both activities will be to expand our diversity and inclusion work throughout the organisation, closely involving our colleague-led Diversity and Inclusion Group. We will also build our corporate social responsibility programme to ensure we are accessing the biggest talent pool and maximising colleague engagement.

Through delivering our digital strategy

Enhancing our digital offer will allow greater access to our service, improve the efficiency and effectiveness of our back-office services and support hybrid working - all steps towards achieving excellent customer service. Together, these elements form our plans for the digital strategic enabling programme.

Providing a fully online complaints handling channel for residents and landlords who want to access this will allow them to see what stage their complaints are at, receive real time updates on their cases, upload information directly and access guidance to progress complaints. We will also explore more user support on our website and smarter ways of accessing our caseworkers through the phone line. The combination of these changes will increase our case handling efficiencies. We recognise that accessibility to all residents is vitally important for our service, so the digital channel will not be developed at the expense of other ways of contacting our service, but rather be complementary to them.

Increasing digitisation in our back-office services will enable us to operate more efficiently by providing access to real-time and joined-up management information for decision-making. It will also support a data driven culture, helping us to work more effectively. Developing our systems and support for hybrid working models will mean that colleagues can operate effectively from the office or home, increasing our resilience and opening our recruitment up to a wider talent pool.

For strategic objective 4: achieving excellence, the priorities and outcomes that we wish to achieve over this corporate plan are summarised in the table:

Strategic priorities	Outcomes achieved
4.1. Develop our employer brand	<ul style="list-style-type: none"> • We are accredited as a top 100 place to work and regarded as a socially responsible, diverse and inclusive employer • We are an employer of choice • Colleagues are positive about their learning and development opportunities and take advantage of these
4.2. Continue our digitisation journey	<ul style="list-style-type: none"> • We have a fully digital complaint handling channel for landlords and residents • Our back-office systems are more efficient and effective • Our digital office supports effective hybrid working

The key activities that will support this plan in year one will be to:

4.1. Develop our employer brand

- Create an academy to support all colleagues' learning and development
- Scope and deliver an academy content, including implementation of a people programme to promote and maintain high performing teams
- Explore caseworker accreditation
- Develop our diversity and inclusion programme
- Start to develop our corporate social responsibility approach
- Set out our employer value proposition

4.2. Continue our digitisation journey

- Review our work environment needs; ensure our office accommodation matches these and hybrid working is supported
- Deliver year one of our digital strategy, making best use of digital solutions including the development and delivery of an online portal to improve access, contact and engagement with the service

Q. Do you agree with Strategic objective 4: Achieving Excellence and priorities? [Yes/No]

Comments:

Q. Do you agree with the key activities in year one? [Yes/No]

Comments:

Q. Is anything missing or are there any observations you would like to make?

Demand, measures of success and subscription fee

Performance and demand over the 2019-22 corporate plan

Each year we report our performance against a balanced scorecard of Key Performance Indicators (KPIs) and business plan deliverables. We have achieved much for the subscription fee over the current corporate plan, including the development and embedding of a new, more efficient and effective operating model, delivery of the Complaint Handling Code and a range of thematic reports.

Alongside these activities, performance against our KPIs has been strong; we have continuously reduced our formal investigation times, from 6.7 months at the start of the current plan to 5.2 months as we enter its final year - one of the most competitive investigation times amongst Ombudsman schemes. We have maintained our delivery of 100% of all determinations within 12 months, high levels of compliance with our orders and positive levels of customer feedback.

Strategic approach to performance and measures of success for year one

Our strategic performance direction across our key performance indicators for the corporate plan is set out in the table below:

Area	Strategic performance direction
<i>Dispute Support</i>	<ul style="list-style-type: none">• Maintained customer satisfaction in face of increased demand
	<ul style="list-style-type: none">• Demonstrable positive impact of the new strategic, intelligence-led approach
<i>Dispute Resolution</i>	<ul style="list-style-type: none">• Maintained customer satisfaction in face of increased demand and complexity
	<ul style="list-style-type: none">• More timely compliance with more stretching orders
	<ul style="list-style-type: none">• Maintained quality in the face of increased demand and complexity
	<ul style="list-style-type: none">• Improved timeliness of determinations overall in the face of increased demand and complexity
<i>Quality, Engagement and Development</i>	<ul style="list-style-type: none">• Demonstrable positive impact of the Centre for Learning
	<ul style="list-style-type: none">• Demonstrable positive impact of awareness raising activity

Our proposed measures of success for year one (2022-23), are set out below. These will be reviewed each year and included within our annual business plan consultations.

Area and measure	Year one performance (2022-23)
<i>Dispute Support</i>	
Improved customer satisfaction in face of increased demand	<ul style="list-style-type: none"> 80% of residents are satisfied with the service provided at dispute support
<i>Dispute Resolution</i>	
Maintained customer satisfaction in face of increased demand and complexity	<ul style="list-style-type: none"> 80% of residents whose complaint was upheld were satisfied with the service provided 50% of the residents whose complaint was not upheld were satisfied with the service provided
More timely compliance with more stretching orders	<ul style="list-style-type: none"> 98% compliance with orders within 3 months 100% compliance with orders within 6 months
Maintained quality in the face of increased demand and complexity	<ul style="list-style-type: none"> 95% of quality assurance reviews find casework was acceptable or better
Improved timeliness of determinations in the face of increased demand and complexity	<ul style="list-style-type: none"> 95% of cases are determined within six months 100% of cases are determined within 12 months
<i>Quality, Engagement and Development</i>	
Increase the depth and breadth of engagement with our learning tools	<ul style="list-style-type: none"> 85% of landlords thought our sector development and engagement work improved their complaint handling or housing services 85% of residents thought our sector development and engagement work was helpful

We have changed the timeliness target measure for formal investigations from an average to a maximum time. We believe this change is fairer and more transparent to both residents and landlords as nearly all cases will be investigated within this maximum timescale – the average measure did not give residents and landlords certainty about when an individual investigation would be completed. The small proportion of cases outside of this timescale are expected to be those that are highly complex, and we will publish our assessment criteria for case complexity on our website, but will still be determined within 12 months. This timeframe includes preparing the case for investigation, in particular gathering evidence from the parties. Evidence gathering can take time, especially if the landlord's record keeping is poor, and given the complaints we investigate increasingly involve multiple issues.

This approach will see us continue to reduce our investigation times, despite rising demand, and will result in more investigations being completed more quickly than under the present target. We have successfully reduced investigation times in recent years, with around 70% of investigations expected to be completed within six months

this year compared to 42% two years ago. Under the revised target this would increase to 95%, which represents a significant stretch on current performance. It will also allow us to maintain the quality of our investigations, which is vital to ensuring trust and confidence in the complaints process and that our orders and remedies are impactful.

**Q. Do you support our strategic performance direction in our corporate plan?
[Yes/No]**

Comments:

**Q. Do you support the key performance measures for year one (2022-23)?
[Yes/No]**

Comments:

Q. Is anything missing or are there any observations you would like to make?

Subscription fee

We are a demand-led service. We have experienced significant increases in demand across all of our casework in the year to date compared with 2020-21- a 139% increase in enquiries and complaints and a 65% increase in cases for formal investigation. There are a higher number of factors that will influence demand compared to previous corporate plans, some working in tension with others:

Factors that will lead to an increase in demand:

- The removal of the democratic filter in late 22-23/early 23-24
- Greater awareness of complaints procedures and our service as a result of work by us, landlords and DLUHC, continued press coverage and better signposting from other organisations
- On-going impacts of Covid-19
- Pressures around repairs in part due to building safety and net zero carbon programmes
- The change to a proactive approach to consumer regulation
- The uncertain financial position of local authorities and some housing associations
- Landlords taking more disrepair claims through their complaints process
- On-going mergers in housing associations and as ALMOs/TMOs continue to be brought back in-house across local authorities
- The growth of the sector.

Factors that will reduce demand:

- The impact of our strategic, intelligence-led work at dispute support and our Centre for Learning on landlord complaint handling
- Landlords' own work to improve their complaint handling and housing services.

The timing and cumulative impact of these factors on demand for our service cannot be accurately quantified. Historical trends in demand for our service show significant fluctuation. Within this, the trend for formal investigations shows several years of smaller increases followed by large spikes. However, each new year sets a new baseline for demand in this area without falling back below the preceding year. The previous largest annual uplift in demand was an increase of 27%.

We have assumed a year-on-year growth rate of 30% across all of our casework. This is a slower rate of growth than for the current year. The factors believed to be influencing current demand are immediate post Covid-19 issues, the impact of the Complaint Handling Code on the speed of landlord complaint handling and increased awareness. The first two of these are expected to lessen in impact from 2022-23 onwards. We have assumed continued growth throughout the three years as the factors listed above will come on-stream at different points in time.

Q. Do you agree a 30% year-on-year growth in demand is a reasonable assumption? [Yes/No]

Q. If not, what do you think this should be?

Comments:

Q. Is anything missing or are there any observations you would like to make?

We have assessed the impact of this demand growth on our service and costed our key strategic programmes to calculate a maximum subscription fee cap. The maximum cap and its breakdown are set out below:

Increase in rate breakdown	£
Current rate	2.16
Increase in demand	2.79
Centre for Learning	0.02
Systemic work	0.15
Awareness raising	0.09
Digital offer	0.09
Maximum fee cap	5.30

In year one, we require a fee of £3.92 to start to deliver our plans and achieve our targets.

We recognise that these figures are a significant increase on the current subscription rate and we will continue to seek the sector's view on the exact fee for each year within our business plan consultations. The increase is almost wholly driven by the forecast increase in demand across all stages of our complaint handling. If demand is lower than forecast, we will revise our assumptions and reflect this in the fee.

However, if demand exceeds these forecasts, we may be required to either seek an exceptional increase to the fee above the maximum cap or amend our KPIs.

We also believe awareness raising activity will distribute demand more evenly across our membership and we will monitor this over the corporate plan to determine if fee impacts are disproportionate. If that is the case, we will consider other fee models and include options within the next corporate plan consultation.

Our current corporate plan focused on making our processes efficient and we have achieved this as well as adopting our new operating model. We will continue to seek efficiencies during this corporate plan, factoring these into the fee calculation at the appropriate time. For example, our digital strategic enabling programme is expected to deliver efficiencies through improved systems once taken up by landlords and residents in sufficient numbers.

We would also encourage landlords to explore how they can strengthen their own resolution approaches, taking advantage of our Centre for Learning and work at dispute support to help mitigate the steep rises we have seen in complaints during this year.

Comments:

Q. Is anything missing or are there any observations you would like to make?