

**Learning from Complaints
Investigation Report**

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1. Foreword

A message from the Group Chief Executive:

Through our work with the Housing Ombudsman Service, we knew we needed to make changes to enable every Sanctuary customer to receive the level of service they deserve. We absolutely welcomed the opportunity to carry out this review, which shines a light on historic failings while also highlighting the hard work underway to improve our services for everyone.

“Sanctuary is determined to be open, honest, and transparent with our residents, and learn from mistakes. While we can’t and won’t fix everything overnight, we’re committed to being the best landlord we can be.”



Craig Moule

Group CEO

A message from the Chairs of the Resident Advisory and Scrutiny Panel:

As the chairs of Sanctuary’s two engaged resident panels, we know just how committed Sanctuary is to do better for its housing customers. Our involvement in the review from start to finish, showed us that Sanctuary’s put in place a number of improvements to deliver better services for its customers and prevent the failings it has accepted, from happening again.

No landlord is perfect, but we believe this sincere and detailed review will stand Sanctuary in good stead. We will continue working together with Sanctuary on its learning and improvement journey.



Jean McDonnell

Resident Advisory
Panel Chair



Bob Werrett

Resident Scrutiny
Panel Chair

2. Executive summary

- 2.1 This report is a review of the underlying causes of service failures in two severe maladministration cases relating to damp and mould resulting from leaks in Sanctuary properties. It considers service improvements, many of which are already being delivered. In carrying out this review Sanctuary has incorporated all the determinations in both Orders, making clear reference to these in each theme.
- 2.2 The report sets out the detail of the method, findings, and recommendations in relation to each of the three themes in both Orders, namely repairs, record-keeping and vulnerabilities. These themes are detailed fully in the Terms of Reference (**Appendix 1**) which have been agreed by the Housing Ombudsman Service, Engaged Residents and the Group Chair and Vice Chair (being the member responsible for complaints oversight) on behalf of the Group Board, who have all reviewed the report.
- 2.3 Sanctuary has taken into account a wide range of information including customer feedback; customer journeys mapped through workshops with customers and colleagues; examination of record keeping; carrying out an impact assessment of the Damp and Mould Taskforce; and a review of the changes made to complaint handling.
- 2.4 During the review process both the Resident Advisory and Scrutiny Panels have been engaged in workshops, case reviews and there have been several deep dive discussions for both panels to review the report and findings and influence accordingly. The latter included the members of the Group Housing Board in addition to the panels.
- 2.5 There is an overlap between the recommendations because they reflect interdependencies between the three themes. Details of all recommendations and actions are set out in the following report.
- 2.6 Table 1 sets out the top three actions by theme likely to drive the largest impact:

Table 1 - Top three actions likely to have the largest impact by theme

Theme	Issue	Top three actions likely to have the largest impact
Repairs	Delays in repair works being completed and repairs being escalated in a timely manner	<ol style="list-style-type: none"> 1. Root cause analysis process to be embedded across the service to better underpin service improvement plans, 2. Roll out predictive analytics (following the pilot) to identify more proactively homes at risk of damp and mould, 3. Enhanced data management and reporting to deliver improved end-to-end repairs journey.

Record-keeping	Use of offline systems and risk of repairs being closed without works being completed	<ol style="list-style-type: none"> 1. Roll out of 'OneProperty' Technology Transformation system, delivering enhanced data management, analysis and reporting, 2. Move the information on damp and mould onto an integrated online system, 3. Continue rolling out the customer census – currently sent to c.70,000 customers to improve customer data.
Vulnerabilities	Information on customer vulnerabilities is not always complete or current and outcomes for customers are not tailored to those vulnerabilities	<ol style="list-style-type: none"> 1. Development and implement of revised vulnerability policy, 2. Expand existing 'Think Customer' and vulnerability training programme across the organisation. 1,900 colleagues booked onto the training across the next four months, 3. Implement a new Customer Relationship Management system

2.7 As part of the Terms of Reference Sanctuary committed to reviewing cases where customers may have been similarly affected by the same issues the customers' experienced in the two cases that initiated this review (references 202224898 and 202216547). Therefore, as part of this review, Sanctuary has identified 236 potentially impacted homes where there is limited evidence that roofing works were carried out in an efficient and timely manner. Where there is limited evidence that the repairs have been completed, those customers are being contacted to establish if there is a requirement to remedy any outstanding issues. If works have not been completed, they will be completed as a matter of urgency. Sanctuary will also apologise to any customer where works have not been completed as they should have been.

2.8 In conclusion, the Group has used the opportunity to carry out this review and share the findings with the Housing Ombudsman as part of its continuous improvement process. Whilst a small number of additional issues have been identified, it is reassuring that many of the recommendations in this report were already being implemented. This helps to demonstrate that the Group is continually assessing how it can improve, is clear about any weaknesses and immediately focuses on improvement. Where issues have been identified further actions have been set out and will be delivered as quickly as possible.

2.8.1 Implementation of these improvements will be monitored by Sanctuary's Resident Scrutiny Panel and Group Board.

2.8.2 This report addresses issues as referred to in the two specific cases and the Terms of Reference. Sanctuary continues its more general programme of improvements, learning from these two cases, but not restricted to them.

3. Introduction

- 3.1 This review relates to the experiences of two customers, and subsequent Housing Ombudsman determinations of severe maladministration in relation to their complaints, under Case reference 202224898 and 202216547, respectively.
- 3.2 Sanctuary produced a Terms of Reference document for this review which was co-produced and agreed by the Group's Resident Advisory Panel and Resident Scrutiny Panel Chairs, Chair of Group Housing Board (who is also Vice Chair of the Group), Chair of Group Board and provided to the Housing Ombudsman Service. The terms of reference were subsequently agreed by the Service on the 18 of December 2023. This introduction summarises the Terms of Reference document, which is included for completeness in **Appendix 1. Appendix 2** includes the Orders from the Housing Ombudsman Service related to the determinations.
- 3.3 The key issues forming the context for this review are:
- The Housing Ombudsman included a specific Order as part of the Severe Maladministration finding for Complaint 202224898. This required Sanctuary to undertake a review of its failures within the Case, and more broadly its practice in relation to responding to customer requests for repairs arising because of leaks, and damp and mould. The finding also required Sanctuary to identify residents affected by similar issues and identify appropriate redress, as well as refer the outcome and conclusions of this review to the Group Board member responsible for complaints, and the Group Board prior to its submission to the Ombudsman. This report has also been agreed by the Chairs of Sanctuary's Resident Scrutiny Panel and Resident Advisory Panel.
 - An additional Severe Maladministration determination was received by Sanctuary on 14 November 2023 for Case 202216547 in relation to Sanctuary's response to the resident's report of a leak and its complaint handling. With the agreement of the Housing Ombudsman this Case has been incorporated into this review.
- 3.4 The two complaints included in this review (202224898 and 202216547) demonstrate several common failures in relation to the way the relevant repairs and resultant complaints were handled. Issues include delays in the repairs being completed, specifically in relation to damp and mould. These two complaints have highlighted a potential risk of a repair being closed in Sanctuary's records without works being completed or works not being carried out and appropriately tracked alongside complaint investigation.
- 3.5 Sanctuary has responded to the individual customers involved in the two complaints separately. This review investigates what the Group has learned from the issues raised and how Sanctuary has improved its processes as a result and embedded those improvements. It also shows what more the Group needs to do.

- 3.6 The review addresses all the issues raised in the Housing Ombudsman determinations by focussing on the root cause of the failures and ensuring that the future approach is the right one to deliver positive customer outcomes.
- 3.7 This investigation has been developed around three themes based on the Orders from the Housing Ombudsman and the associated customer experiences, these themes are:
- repairs,
 - record keeping, and
 - vulnerabilities.
- 3.8 As part of the Terms of Reference Sanctuary committed to reviewing cases where customers may have been similarly affected by the same issues the customers' experienced in the two cases that initiated this review (references 202224898 and 202216547). Therefore, as part of this review, Sanctuary has identified 236 potentially impacted homes where there is limited evidence that roofing works were carried out in an efficient and timely manner. In these cases, customers are already being contacted to establish if there is a requirement to remedy any outstanding issues. If works have not been completed, they will be completed as a matter of urgency. Sanctuary will also apologise to any customer where works have not been completed as they should have been.

4. About Sanctuary

- 4.1 Sanctuary's mission is to build affordable homes and sustainable communities where people choose to live. It provides homes and care for more than 250,000 people. Across England and Scotland, Sanctuary manages around 120,000 homes and more than 650 supported housing schemes. Its turnover is about £1 billion each year.
- 4.2 Sanctuary's current Corporate Strategy spans January 2023 to January 2026 and sets out three key objectives developed from listening extensively to what customers and colleagues have said. The strategic priorities are:
- Customers first,
 - Investing in our assets, and
 - Growing our services.
- 4.3 In putting customers first, Sanctuary follows its North Star vision in Housing and Property Services, adopted to create 'a local relationship' with customers, providing a place to live that is good quality, affordable, safe and secure. Sanctuary cannot do this alone and needs to work in collaboration with customers to create a sustainable home within thriving communities. This cultural change programme was created to drive and deliver a customer centred delivery model. The North Star is underpinned by a full change programme, some of the key projects include:
- Implementation of enhanced transactional monitoring, asking customers their views of the service delivered.
 - A new 'local' operating model in Housing, driving a more local approach to delivery.
 - End to end overhaul of the complaints process including introducing a completely new way of working to make sure complaints are responded to within published timescales and promises made are kept, underpinned by increased resources with the Complaints team doubling in size,
 - Revised inhouse model within Property Services, the Group's repairs and maintenance service, and
 - New 'Think Customer' training programme which is being rolled out to all staff in Housing and Property Services from April 2024.
- 4.4 For Supported Living Services, 'Be our Best' is the five-year strategy that has been developed to ensure that supported customers receive the tailored service they require, specific to their needs. This is focussed on improving and building on the excellent quality of customers' experience, including better use of technology to plan and manage care using the Nourish system, and investing even more in infrastructure to provide better Wi-Fi for customers.
- 4.5 Each year Sanctuary completes more than 215,000 repairs, which when added to housing visits means customers' homes are visited more than half a

million times in addition to scheme engagement sessions. The transactional survey data shows that more than 78 per cent of customers who recently had a repair are satisfied with the service. This level of satisfaction is supported by only two and a half per cent of repairs resulting in a formal complaint.

- 4.6 The strategic objective of 'Investing in our assets' has seen Sanctuary invest more than ever last financial year in customers' homes, both on responsive repairs and planned improvement work, which together totalled well over £120 million. In the next financial year, Sanctuary will further increase its reinvestment on planned long-term improvements by about one-third from £112 million to £133 million.
- 4.7 Sanctuary is focussed on continually improving the quality of its services, particularly related to repairs. Initiatives include the rollout of OneProperty, a Group wide technology transformation programme that will result in a new system underpinning improved service delivery and is currently being piloted in Scotland. This investment has been shaped and influenced by customers and focusses on improving the quality, efficiency, and effectiveness of the service with a keen eye on improved customer outcomes. It goes further than just a repairs system, it provides enhanced information and data management on the customers' repairs journey. It provides a clear and real time view of the repairs history for a home, linked to customer information. This project will be rolled out across England this year with a new expedited implementation plan. In support of and as part of this transformation the Group has also started to introduce a new operating model across Property Services, focussing on ensuring repairs performance improves, delivering more repairs right first time and a customer first approach.
- 4.8 Sanctuary is transforming its ways of working across front line Housing services through the new operating models, focussed on strengthening and empowering local teams to listen to customers and act upon what they say. This will result in improved customer outcomes.
- 4.9 Sanctuary is embedding a learning culture. There are many examples of this including:
- The Person Safety Incident Response Framework (PSIR) used within the Care business. The focus of the PSIR is to take wider learning from individual incidents to prevent recurrence. The Group is taking the learning from this approach outside of Care and embedding this approach to support learning from complaints within Housing.
 - The Group has also introduced a new complaints operating model which has already seen major improvements in responding to complaints, ensuring responses are aligned to the Housing Ombudsman Complaints Handling Code.
 - Sanctuary is now beginning to implement a new method of root cause analysis, to prevent complaints rather than simply respond to them effectively when they occur.

Sanctuary

- In January 2024, Sanctuary also introduced new transactional feedback from customers who have gone through the complaints process to determine where further improvements are needed.
- The Group also commissioned an independent review of complaint handling by Altair, referenced later in section six of this report.

5. Housing Ombudsman determinations

- 5.1 Between March 2023 and 31 October 2023, the Housing Ombudsman issued Sanctuary a total of 115 determinations from 44 cases:
- 13 severe maladministration determinations issued (from nine cases). (11 per cent of determinations).
 - 40 maladministration determinations issued (35 per cent determinations).
 - 21 service failure determinations issued (25 per cent of determinations).
 - 41 determinations resulted in reasonable redress or no maladministration (36 per cent of determinations).
- 5.2 Sanctuary has paid £61,679 in compensation as ordered or recommended by the Housing Ombudsman (including payments already made via Sanctuary's formal complaints process) a rate of £1,402 per case.
- 5.3 Sanctuary received 197 orders and recommendations from the Housing Ombudsman.



*Compensation

£61,679



Maladministration Rate

64%



Severe
Maladministration

11%

*Includes compensation offered through Sanctuary's complaints process

6. Theme One: Repairs

6.1 Introduction

6.1.1 The customer experience highlighted by the Housing Ombudsman Service investigations showed that repairs related to leaks and associated damp and mould are not always completed within published timescales. The customers experienced repeated visits from surveyors and contractors and delays in completion of works. This theme investigates Sanctuary's repairs performance and how it can be improved, specifically in relation to leaks and damp and mould. Actions taken to improve repairs performance will not only improve repairs to leaks but all repairs, benefitting customers reporting any type of repair.

6.2 Methodology

6.2.1 Sanctuary has used the following approach to investigate the theme of repairs:

- A review of business information and key performance indicators on repairs performance within the period from January 2020 to October 2023. This period has been chosen because the first issue was reported by the customer in January 2020 and October 2023 is when the determinations were made.
- Workshops to map the customer journey, customer feedback sessions to identify improvements from the customer's point of view, and a root cause analysis workshop with key stakeholders (customers and teams across the Group including repairs planners, customer contact centre, frontline repairs teams, housing, complaints) to identify where systems, process, and staff interactions can be improved.
- An assessment of the impact of the service improvements made since November 2022 (when Sanctuary's damp and mould Taskforce started its work) and the wider North Star transformation programme (Sanctuary's customer first programme) introduced in December 2022.
- Repairs review conducted by the Resident Scrutiny Panel.
- A scrutiny and root cause workshop with Directors and Senior Management team within Property Services (including damp and mould), ensuring those responsible for day-to-day delivery of services understand the detail of the failures highlighted by the cases and are able to drive improvement in the areas highlighted.

6.3 Findings

6.3.1 Last financial year, Sanctuary handled 407,017 calls from customers related to repairs. Sanctuary completed 215,449 repairs. In the same year, Sanctuary received 5,004 complaints related to repairs. This is equivalent to about two and half per cent of the total repairs. This demonstrates that Sanctuary, whilst never complacent and always striving to improve, provides most customers with a high-quality service, with an average customer

satisfaction rating of 78 per cent as assessed through Qualtrics transactional surveys. When customers state their repairs have not been dealt with to their satisfaction, this is followed up with them directly to rectify their concerns.

- 6.3.2 Sanctuary strives to improve performance when dealing with repairs, aiming to improve timeliness and first-time-fix rates. The Group does not underestimate the challenge, both for the internal repairs service and where contractors are used. Sanctuary currently deals with about 65 per cent of day-to-day repairs in 45 days and 78 per cent of these repairs are completed by the in-house repairs team.
- 6.3.3 Sanctuary has an indication from Tenant Satisfaction Measures that its overall customer satisfaction is getting better (improving from 58.9 per cent to 65.5 per cent in the last year) where the North Star is taking effect.
- 6.3.4 In April 2024, Sanctuary is introducing a new Customer Outcomes Framework developed in collaboration with its Resident Advisory Panel and over 5,000 customers. The outcomes framework is based upon what customers have said are most important to them - 'I feel proud', 'I feel respected' and 'I feel safe'. There is a clear set of measures for each of the three outcomes, giving much greater visibility of how the service is performing in the eyes of the customers, and enabling teams to focus where change is needed.
- 6.3.5 Sanctuary's OneProperty technology transformation programme is pivotal to the improvement journey. It provides the Group with much greater visibility of repairs from end to end, reducing the need for repeat contact and follow on repairs. This system, associated process and cultural changes will lead to repairs being completed quicker and provide appointment times better suited to customer needs. The enhanced and more detailed data and insight about the individual customer's repairs journey will not only feed into decisions on future repairs, for example, whether to fix or replace a component, but will also allow for improved analysis on whether a specific component lasts longer, enabling the Group to drive service improvements and procurement efficiency over the longer term.
- 6.3.6 There is already evidence of this from the pilot of OneProperty in Scotland, with the average number of completed repairs per day per operative increasing from 3.3 to 3.7 due to scheduling efficiencies. In Scotland, transactional customer satisfaction with repairs has increased from 81 per cent in September and October 2023 to 83 per cent satisfaction in November 2023 to January 2024. Although not a large increase, this indicates that customers are happier with the experience. This major transformation is being rolled out across England in an expedited implementation programme by summer 2024.
- 6.3.7 Levels of customer satisfaction with repairs is lower when contractors are used. While most repairs are carried out by internal staff, this is not always possible. Sanctuary now has a refreshed approach to contractor management, delivered through the new operating model. Providing closer

oversight of the quality of repairs and value for money delivered by contractors. This has resulted in a full review of the cancellation and rebooking process, repairs surveys and inspection process.

- 6.3.8 In 2023, Sanctuary introduced Customer Focus Days, a pro-active approach where local teams from multiple functions are brought together in a specific location to tackle customer issues there and then, particularly simple repairs. Where things cannot be fixed at the time, the repairs are arranged, and actions agreed with customers. Customer Focus Days are already having a positive impact on satisfaction, with customers reporting satisfaction of more than 90 per cent where these events have taken place.
- 6.3.9 Sanctuary is also making intelligent use of the data it holds to identify 'hot' and 'cold' properties, resulting in visits to proactively engage with customers who have reported multiple issues, or visits where Sanctuary has not heard from a customer for two years, to make sure any new or unreported and outstanding issues are addressed.
- 6.3.10 Over the last three years the number of complaints received has more than doubled. Whilst Sanctuary is getting better at handling complaints, it recognises further improvements to the service are required.
- 6.3.11 A new complaints operating model has been introduced, resulting in Sanctuary now responding to more than 99 per cent of stage one complaints handled by the central Complaints team in the target time of 10 working days. Performance is improving every month. The Group is also responding to 100 per cent of stage two complaints in the target of 20 working days. Sanctuary is fully committed to responding to all complaints on time and continues to make significant additional investment in expanding the skills and capacity of the complaints handling team, with 21 additional members of the team in place so far. Sanctuary is also strengthening its quality assurance framework, ensuring complaints are managed in a consistent and efficient manner. Customer feedback is also sought through follow-up transactional surveys after a complaint is closed. This data is used to improve the processes in complaints and the root cause of the complaint.
- 6.3.12 To identify solutions at each stage of the customer's damp and mould repair journey, Sanctuary held customer journey mapping workshop with both colleagues and customers, based upon a Housing Ombudsman maladministration case study. This workshop included colleagues and customers who were accessing the disrepair process for their damp and mould repair. The aim of this workshop was to identify and implement a fully joined up process.
- 6.3.13 The participants identified the following improvement opportunities in the customer journey:

- Closer case management, with colleagues being clearer about their specific responsibilities. Including clarity of ownership to ensure repairs were completed effectively.
- Improve the pro-active communication with customers to keep them informed with what is happening at each stage of their repair, placing less reliance on customers to escalate and chase.
- Strengthen the internal escalation process when damp and mould repairs are nearing target timescales.

6.3.14 The results of this journey mapping exercise significantly overlap with other feedback received from customers, and initial results for Tenant Satisfaction Measures related to satisfaction with the repairs service and time taken to complete a repair. And Key Driver Analysis of Tenant Satisfaction Measures found that customers' views being listened to and acted upon is the biggest driver of overall satisfaction.

6.3.15 The most common reasons for customers telling Sanctuary that their views have not been listened to or acted upon, and therefore where improvements will be focussed, are:

- Length of time for a repair to be completed, with customers reporting dissatisfaction with the time taken to fix their repair, and the delays between appointments (for more complex repairs).
- A lack of proactive communication, with some customers unhappy with the limited communication to update them on their repair progress.
- Not resolving issues quickly or at the first appointment, sometimes resulting in multiple visits the customer feels are unnecessary.
- Not being clear about customer versus landlord responsibilities, with some customers unclear about which repairs are their responsibility, and which are the responsibility of Sanctuary, particularly amongst homeowners.

6.3.16 These themes are consistent with the feedback customers give in real-time when a repair has been completed. As stated previously, overall satisfaction with repairs is 78 per cent, so most customers are saying they receive a high-quality service.

6.3.17 Sanctuary is focussing on these themes in the new operating and governance models which are being introduced in Property Services. There is more structured performance management with a golden thread from an individual operative level through to regional and directorate wide measures, supported by performance reporting. Progress with performance on the speed and quality of repairs is tracked daily and weekly through operational reporting and monthly through Balanced Scorecards up to the Group Board.

6.3.18 Recognising the priority of damp and mould within the sector, Sanctuary established a specific Damp and Mould Taskforce in November 2022, with key stakeholders from across Group. Sanctuary published its five commitments for how it manages cases of damp and mould:

- A zero-tolerance approach to damp and mould with a four-step process to identify, remedy, resolve and prevent damp and mould.
- Whenever contacted by customers about damp and mould, Sanctuary will work with customers to make sure the problem is diagnosed at an early stage.
- Sanctuary will tailor its approach based upon understanding customer needs.
- Sanctuary will make sure its teams have the skills and knowledge to tackle the issue effectively.
- Sanctuary might not always get things right first time. Where it does not, it will work with customers to make sure the situation is quickly remedied.

6.3.19 The Damp & Mould Taskforce published the results of its self-assessment against the Housing Ombudsman Spotlight Report on Damp and Mould 'It's not Lifestyle' on the Sanctuary website.

6.3.20 For this investigation, Sanctuary has assessed the impact the Taskforce has had on customer outcomes. Sanctuary has developed more clarity around the volume and severity of damp and mould within homes, a clearer approach on how to tackle this faster, and better recording and reporting through the specific damp and mould dashboard.

6.3.21 Sanctuary has strengthened and simplified the information provided to customers on how to report damp and mould. Sanctuary has had positive feedback from customers when they have been specifically asked about the clarity and tone of this information. Sanctuary has delivered damp and mould awareness training to all customer-facing colleagues and more in-depth training for operatives alongside damp and mould kits being added to every van. This has led to a greater awareness of the symptoms, root causes and required treatment of damp and mould, which has benefited customers.

6.3.22 Sanctuary has also introduced data loggers in homes to identify the risk of damp and mould being present in real-time. This pilot has enabled the team to pro-actively visit homes where the data has highlighted a concern and prioritise surveys and repairs appropriately. The technology is now being rolled out on a broader programme.

6.3.23 Sanctuary is also now contacting customers three months after repairs related to damp and mould have been completed, to understand whether the issue has reoccurred. Eight per cent of all customers contacted, have responded to let the Group know that the damp and mould has not been eradicated. These customer cases are now being triaged and assessed to ensure the repairs are given the appropriate priority and urgency.

6.3.24 Sanctuary recognises that the role of the Damp & Mould Taskforce will now move to have a greater focus on pro-actively preventing damp and mould, rather than responding to it. This will see the Group use its historic data, coupled with customer feedback using predictive analytics to identify patterns

of where damp and mould could occur, to determine properties which are at greater risk of damp and mould. This data will influence future planned maintenance and reinvestment priorities.

6.4 Recommendations

6.4.1 In the cases highlighted by the Housing Ombudsman Service there were delays in repairs being completed and repairs not being escalated in a timely manner. As demonstrated in this review Sanctuary already has significant work in progress to address the timeliness of repairs. Table 2 shows the work that the Group will continue to drive to improve this along with some new actions to be delivered as a result of this review.

Table 2 - Findings and recommendations: repairs

Case issues / Determinations	Findings	Recommendations	Tasks/projects to address the issues
<p>Delays in repairs being completed.</p> <p>Complex repairs not being escalated in a timely manner, specifically in relation to damp and mould.</p> <p>The customer repeatedly raising issues and experiencing the same outcome.</p> <p>Limited proactive communication on repair progress.</p> <p>Determinations 202224898: 5a, 5c, 6a, 6b, 7</p>	<p>Learning from mistakes is evident but more can be done to prevent reoccurrence of issues.</p>	<p>Root cause analysis to be further embedded and learning to be fed into structured change management to drive sustained improvements.</p> <p>Improvements to be supported by clear communications to colleagues and customers on progress made</p>	<ul style="list-style-type: none"> ✓ Senior Root Cause Analyst started in role in January 2024. Widen the scope of customer insight to cover additional teams/services. ✓ Customer Outcomes Framework to be fully rolled out. ✓ Improve the visibility of complaints for colleagues and customers for example 'You Said - We're Listening'.
	<p>Repairs are currently reported and monitored individually, not considering the end-to-end customer journey.</p>	<p>End-to-end reporting & management of linked repairs is to be improved to prevent protracted repair journeys. Including automatic escalation and clear ownership of end-to-end damp and mould repairs and contact with customer.</p>	<ul style="list-style-type: none"> ✓ New Property Services Operating Model. ✓ OneProperty Technology Transformation ✓ Repairs hub and commercial management of contractors ✓ Governance, Quality Framework & Standard Operating Procedures in Property Services and Complaints. ✓ Scottish end-to-end case management pilot ◇ Improve escalation & reporting for out-of-timeframe repairs
	<p>Damp & Mould Taskforce has been instrumental in the awareness raising & escalation of</p>	<p>Embed damp & mould 'hot' property analysis.</p> <p>Determine key drivers or opportunities for proactively supporting customers.</p>	<ul style="list-style-type: none"> ✓ Further roll out of three-month post-damp & mould repair surveys to determine if damp is still present. ✓ Ongoing hot/cold property reviews ✓ Development of the revised approach to in-life asset

	<p>damp & mould cases.</p> <p>Key driver analysis could be rolled out to help identify more opportunities for preventative case interventions.</p>		<p>management and strategic asset management to better manage lifecycle investment based on archetype and risk factors.</p> <ul style="list-style-type: none"> ◇ Review role and membership of the damp and mould taskforce using lessons learned so far. ◇ Key driver damp & mould analysis to determine high risk damp & mould properties & proactively support customers.
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✓ *Inflight projects*

◇ *New projects*

6.5 Conclusion

6.5.1 Delivery of the actions set out will not only improve the experience of customers reporting repairs related to damp and mould, but all customers' repair journeys. The new actions will mark another step change in how the Group proactively identify and support customers with homes that could be at risk of damp and mould.

7. Theme Two: Record Keeping

7.1 Introduction

7.1.1 The Housing Ombudsman called knowledge and information management the 'silver bullet' for improvement in the social housing sector in his report on the subject in 2023. The cases of severe maladministration reviewed in this report confirmed the findings of the self-assessment completed by Sanctuary when the Ombudsman's report was published. The cases showed there is a risk that repairs are closed without being completed. The use of off-line systems increases the risk of data gaps and means that information is not always available in one place, making it hard to prioritise accurately repairs and respond to complaints. This section of the report reviews the process of record keeping for the two referenced cases and recommends improvements.

7.2 Methodology

7.2.1 Sanctuary has used the following approach to review the theme of record keeping:

- A review of record keeping for repairs taking more than 28 days and for associated complaints to ensure the Group is responding effectively and in appropriate timescales.
- A review of recommendations from the independent report into Complaint Handling, conducted by Altair, commissioned by the Group Board and Engaged Residents in August 2023.
- The Resident Advisory panel completed a review on the approach to record keeping with a specific focus on suitably collecting and storing customer data.
- A review of the Data and Analytics strategy to make sure the Group has sufficient focus on data quality to support robust reporting and handling of repairs and complaints.
- A review of the implementation of the action plan following Sanctuary's Knowledge and Information Management self-assessment (completed September 2023).

7.3 Findings

7.3.1 Sanctuary keeps detailed, system-based records of repairs and complaints and the Group has management information reports to support the delivery of repairs and complaints management.

7.3.2 For damp and mould cases specifically, Sanctuary has introduced a damp and mould performance dashboard. This gives visibility of open repairs and complaints across the business, from strategic to operational levels. Sanctuary's Executive Committee receives a weekly report of cases and the Group Board receive a report at every meeting, ensuring oversight at the most senior level.

- 7.3.3 Operationally, there is a specific management information report for repairs outside of target timescale. For damp and mould cases specifically, the relevant members of the team use this report to escalate cases on a weekly basis. Regional surveying teams then follow-up specific actions to ensure repairs are completed. Sanctuary recognises the use of these 'out of target' reports could be more effectively embedded and is promoting them more widely in operational teams.
- 7.3.4 A refreshed centralised approach to planning repairs and managing contractors is in place. Where there are external contractors involved in repairs that are outside of target timescales, issues are addressed through the performance management processes involving the procurement team, and if not resolved, contractors removed from the procurement framework.
- 7.3.5 Sanctuary is aware that systems need to enable clearer management of repairs from an 'end-to-end' perspective, from when a customer reports the issue to when all the work has been completed. Sanctuary also recognises that improving the categorisation of repairs will improve data, support intelligent analysis, reporting and the delivery of service. In some cases, the Group relies on spreadsheets to record information and not main systems. Sanctuary has introduced a new way of recording and managing major repairs called the Delivery Prioritisation System, which reduces reliance on spreadsheets. There is a current programme of work to review all spreadsheets and replace them with more systemised reporting and enhanced automated reporting.
- 7.3.6 Sanctuary also recognises there is more to do to improve the information held related to customer vulnerabilities, and the need for a new Customer Relationship Management system. This is dealt with in detail in section 7 below.
- 7.3.7 When managing complaints, Sanctuary has made very significant improvements in performance. The Group is currently responding to more than 99 per cent of stage one complaints within the target time and all stage two complaints within target. Sanctuary is fully committed to responding to all complaints within target. Performance improvements have been a consequence of significant additional investment within the complaints handling teams, recruiting additional staff, and implementing a new operating model.
- 7.3.8 A specific aspect of the new complaints operating model is assuring that repairs related to a complaint are followed through to completion. Sanctuary began to introduce a new Works Co-ordination team in Autumn 2023 which track repairs through to completion - even when a complaint has been closed - to ensure the necessary work is completed to the right standard. This team covers all stages of the complaints process. Whilst this team has only been fully operational since early 2024, Sanctuary has already had positive feedback from customers regarding how they have been kept informed and follow-up work completed.

- 7.3.9 Last July, in response to the increase in the number of severe maladministration findings from the Housing Ombudsman, Sanctuary's Group Board, Resident Advisory Panel and Resident Scrutiny Panel commissioned an independent review of complaints handling by Altair.
- 7.3.10 The Altair report summarises that Sanctuary's new complaints handling operating model is appropriate when compared to peers and best practice and policy requirements. They have recommended that Sanctuary should:
- Improve learning from complaints by improving the sight of live complaints information to services.
 - Consider the provision and sight of complaints by customers and operational teams when implementing any new complaints system.
 - Implement the planned new approach to root cause analysis.
 - Consider new ways of providing strong information about service quality to equip leaders more to listen to and act on customer voice.
 - Broaden guidance in relation to 'reasonable adjustments', considering the recent Housing Ombudsman spotlight report 'Attitudes, respects and rights'.
 - Strengthen the consistent application of Sanctuary's compensation procedure.
 - Consider carefully where template responses are used.
- 7.3.11 In their review of lessons learned from Housing Ombudsman determinations, Altair stated that: overall, lessons are being learned and implemented, and that the assessment of previous complaints and the development of the new works co-ordination team are positive improvements.
- 7.3.12 A key area where Altair agreed further work was needed was investing additional resource in root cause analysis. A new specialist lead for this work started work in January 2024. Improved root cause analysis will feed into reporting across Sanctuary to drive improvements and will also be included in Board reporting.
- 7.3.13 To ensure that the Group hear a greater customer voice in relation to how complaints are dealt with, Sanctuary introduced a new follow-up customer experience survey in January 2024. This enables a greater understanding of how current improvements are being received and how further improvements in the process should be targeted. Where any customer has told Sanctuary they believe there is an element of the complaint that is outstanding, regardless of whether they agree with the outcome, the customer is contacted to resolve this.
- 7.3.14 Sanctuary is developing a new policy and procedure for vulnerable customers, considering the Housing Ombudsman spotlight report 'Attitudes, respects and rights' which is discussed in detail in the section 7.
- 7.3.15 Sanctuary completed its self-assessment against the Housing Ombudsman spotlight report on Knowledge and Information Management. The key improvements identified relate to the quality and accuracy of information held

about customers and how this information is used. This has led to the development of a knowledge and information management strategy.

7.3.16 Sanctuary is now introducing a new customer census data-collection project from March 2024 to increase the coverage, range, and quality of data held on customers. Customers will be contacted directly and asked to share their updated information online. Front-line teams will also be supporting this process as they visit customers for other purposes. This enhances data and information management to support improvements in delivery for individual customers and planning for the future services.

7.4 Recommendations

7.4.1 The key issues around record keeping highlighted by the Housing Ombudsman Service Investigations were that there was a risk that repairs were closed on Sanctuary systems without works being fully completed. This was partially driven by the use of off-line systems meaning that repairs were hard to categorise and manage. These issues were already being addressed by Sanctuary as set out below. The Group will continue to deliver the improvements as quickly as possible. Where gaps were identified in use of customer data to tailor services, further work has been set out in Table 3.

Table 3 - Findings and recommendations: record keeping

Case issues / Determinations	Findings	Recommendations	Tasks/projects to address the issues
<p>Risk of repairs being closed without works being fully completed.</p> <p>Use of some off-line systems which makes it hard to prioritise and manage repairs appropriately and respond to complaints.</p> <p>Determinations 202224898: 5d, 6a, 6b, 7 202216547: 6bi and ii, 6c, 6d</p>	<p>Systematic categorisation of repairs requires improvement, as it currently results in analysis, reporting and escalations being managed off-line or with manual workarounds.</p>	<p>Improve how repairs are categorised to enable more accurate analysis and reporting. This will drive improvements in prioritisation of repairs and resources delivering an improved experience.</p>	<p>✓ Damp and Mould Dashboard.</p> <p>✓ Property Services Operating Structure.</p> <p>✓ Enhanced data management and governance.</p> <p>✓ Complaints Works Coordination team and Wellbeing team.</p> <p>✓ Scottish end-to-end case management pilot.</p>
	<p>Due to limitations in record keeping, reports to support KPI's and decision making is manual</p>	<p>Information should be moved to online systems to improve visibility and reporting. Driving the prioritisation of repairs and tailor services to customer vulnerabilities.</p>	
	<p>Quality of record keeping – free test fields mean it is not always easy to establish the latest position on repairs and there is a potential for inconsistent practice between regions in the quality of record keeping.</p>	<p>Improvement of record keeping, starting from improvement in system functionality to be able to adequately store customer vulnerabilities manage the repairs journey.</p>	<p>✓ OneProperty Technology Transformation.</p> <p>✓ Sanctuary Census.</p> <p>◇ Sanctuary Customer Relationship Management transformation.</p>

✓ *Inflight projects*

◇ *New projects*

7.5 Conclusion

- 7.5.1 The implementation of Sanctuary's new OneProperty technology transformation programme, continued improvements in complaint handling and implementation of the knowledge and information strategy are already leading to improvements in the visibility and categorisation of repairs. The outlined improvements in visibility of customer data will allow even better prioritisation based on customers' needs.

8. Theme Three: Vulnerabilities

8.1 Introduction

8.1.1 The Housing Ombudsman required the review to investigate whether customer's vulnerabilities were considered in the handling of their repairs and complaints. The customer in one case had multiple health conditions which could have made them vulnerable. The review looked at whether repairs and escalations considered the customer's vulnerabilities. It also examined how customer vulnerabilities are recorded.

8.2 Methodology

8.2.1 Sanctuary has used the following approach to investigate the theme of vulnerabilities:

- A review of current policy, process and accompanying training materials for the identification, assessment and support of customers with vulnerabilities.
- An assessment of whether current and proposed changes to recording and sharing of information on vulnerabilities of customers adequately protect them, with particular reference to personalised outcomes for customers.
- The Resident Advisory and Resident Scrutiny Panels reviewed the vulnerabilities process and policy and also fed-in the vulnerabilities they felt were important, capturing the customer voice in this review.
- A review of the quality and frequency of the staff training delivered on repairs handling and customer vulnerabilities in Sanctuary's Customer Service Centre, whether it follows best practice, incorporates relevant learning from Ombudsman cases and drives a learning culture.
- An assessment of the impact of training against the outcome of root cause analysis to establish whether the areas of service failure are appropriately addressed in such training.
- A review with staff on the impact of training delivered and evaluation of such training.

8.3 Findings

8.3.1 Sanctuary tailors its services based on the needs of customers every day. The strategic priority of putting customers first demonstrates the Group's commitment to delivering personalised services to meet customers' specific needs and concerns. Sanctuary aims to offer choice to its customers in the way they interact – recognising that a one-size-fits-all approach will not work for every customer.

8.3.2 Recognising and responding to vulnerabilities is crucial, and as such Sanctuary follows the statutory framework, including the Equality Act 2010, the Human Rights Act 1998 and Care Act 2004, making reasonable adjustments where appropriate.

- 8.3.3 Sanctuary has a range of specific policies and procedures in place which address customer vulnerabilities, including Repairs - Group Policy and Procedure, Anti-social Behaviour - Group Policy and Procedure and Safeguarding - Group Policy and Procedure. There are also specific policies and procedures for Aids and Adaptations to support residents with a disability or infirmity affecting their ability to carry out normal day-to-day activities, to live independently in their home and enjoy a good quality of life.
- 8.3.4 Sanctuary is developing a new, overall, vulnerable customers policy for approval by its Group Housing Board in April 2024. This considers the Housing Ombudsman spotlight report 'Attitudes, respects and rights'.
- 8.3.5 Sanctuary recognises that vulnerability is a dynamic state which arises from a combination of a customer's personal circumstances and characteristics. A vulnerability may not always fit the statutory framework, may change over time and may affect any household member.
- 8.3.6 Sanctuary is working extensively with customers, particularly its Resident Advisory Panel, together with experts from Sanctuary's Supported Living business, to shape its new policy for vulnerable customers, Sanctuary has identified key risk factors:
- Health and Wellbeing
 - Short term health conditions and significant life changes, for example:
 - Recent hospital discharge.
 - Bereavement.
 - Long-term and chronic health conditions.
 - Physical disability or illness.
 - Mental health.
 - Victim of domestic abuse.
 - Tenancy
 - Utility provisions/financial instability.
 - Overcrowding.
 - Change in behaviour over a short period of time (for example, antisocial behaviour).
 - Repeated no access to the home.
 - Customers in their new home
 - First tenancy, particularly if under 21.
 - First 12 months of a tenancy.
 - Prison leaver.
 - Care leaver.
- 8.3.7 Alongside the statutory framework, Sanctuary will consider these key risk factors in ensuring customers feel respected and supported. These factors are included in training, particularly for the Customer Service Centre. Where necessary, a referral is made to the Wellbeing service. New 'Think Customer' training is being rolled out throughout Spring and Summer 2024 for all Housing and Property colleagues, where vulnerability is a core focus.

- 8.3.8 Sanctuary understands that some customers may not wish to be labelled as 'vulnerable' or treated as such. The approach set out above respects a customer's autonomy and does not automatically apply the label of 'vulnerable'.
- 8.3.9 Sanctuary will keep the key risk factors under review with customers and make changes if the factors do not continue to reflect what is most important to deliver the high quality of tailored service. The Group will also monitor the quality of service for vulnerable customers through:
- Follow up customer experience surveys, including after a call with the Customer Service Centre.
 - The quality assurance framework within the Customer Service Centre, which reviews call quality and alters operational practice and training as required.
 - Performance reporting, with necessary escalation of cases referred to the Wellbeing service.
 - Follow up surveys after closure of a wellbeing case.
- 8.3.10 Sanctuary uses the everyday contact with customers and information held on systems to tailor services. It has person alerts on the system to flag potential vulnerabilities to front line and Customer Service Centre teams. It is important to continually improve the quality and visibility of customer information. As set out previously, Sanctuary is introducing a new customer census to increase the coverage, range and quality of data.
- 8.3.11 Sanctuary is also aware improvements in systems will be required to underpin the requirement for greater visibility of data. This is being built into OneProperty which will be rolled out throughout 2024, and through the implementation of a new Customer Relationship Management system which is being scoped ready for launch in 2025.
- 8.3.12 In reviewing the current staff training related to customer vulnerabilities, particularly the reporting of wellbeing concerns, it was found that the Customer Service Centre and local operational colleagues felt there was a clear process in place for reporting concerns when directly informed by the customer or when they identified concern for the customer's welfare. The referral is done using an online form which goes directly to the Wellbeing service in the Customer Service Centre. Example scenarios to use as guide as to whether a referral should be raised are also accessible for staff. Colleagues also felt empowered to consult a manager or a member of the Wellbeing team, if needed for support.
- 8.3.13 Staff working within Sanctuary's Customer Service Centre receive mandatory training as part of their induction. The courses are as follows: Wellbeing, Crisis, Safeguarding, Empathy, Sanctuary Way (internal escalations), and Customer Interaction Centre (Sanctuary's contact management system).

- 8.3.14 Customer Service Officers and Administration Officers all were able to describe what process to follow if a customer discloses a new welfare or vulnerability concern to them.
- 8.3.15 The Customer Service Centre Wellbeing team demonstrated competence to carry out their roles, and recent training had improved this. Experience, formal learning and sharing best practice had brought strength and confidence to the team. Processes introduced over the last six months had given the team more control when they monitor repairs.
- 8.3.16 This review has identified that the inspections team (surveyors) are not provided with adequate training to sufficiently understand wellbeing, vulnerability, and empathy. This could lead to wellbeing/vulnerability concerns not being identified when carrying out an inspection. This is being addressed in the new 'Think Customer' training and surveyors are being prioritised for existing training provided to the Customer Service Centre.
- 8.3.17 The staff within the new complaints structure have received internal training to improve complaint handling and how to support vulnerable customers. This training has been facilitated across the teams by their respective managers. Those who have been recently recruited into this structure have come from a complaints background with knowledge and experience.
- 8.3.18 The new structure means that complaint recording and handling also has a new formal process, detailing who is responsible for owning, managing and responding to complaints. Whilst this has been evolving at pace, the training does not currently match the skills these specialists need, meaning there is a skills gap. Additionally, there appears to be a lack of consistent training received by frontline staff which enables them to confidently discuss initial complaints and respond appropriately.
- 8.3.19 Frontline operational staff currently do not receive formal consistent complaints training. The necessary training will be fully developed by September 2024, with delivery completed by end of 2024. Both areas will now have a structured approach to complaints handling which is applicable to their level of involvement.

8.4 Recommendations

- 8.4.1 The Housing Ombudsman Service investigations showed that customer vulnerabilities were not always captured in Sanctuary systems, meaning escalations on the basis of vulnerabilities were not always possible. This means that the service delivered is not always tailored to the customer's specific needs. Again, work is already under way to address these issues, but this review has helped to identify where Sanctuary will go further, as set out below.

Table 4 - Findings and recommendations: vulnerabilities

Case issues / Determinations	Findings	Recommendations	Tasks/projects to address the issues
<p>Customer vulnerabilities are not always clearly recorded meaning escalations and complaints resolutions on the basis of customer needs are not systematic.</p> <p>Customers are not always receiving a tailored service based on their vulnerability.</p> <p>Determinations 202224898: 5c ii, 7 202216547: 6b i, ii, iii, 6c, 6d</p>	<p>Policy, process and accountabilities are clear within the wellbeing team, and frontline colleagues know when to escalate.</p> <p>Guidance to staff states to ask the customer if they have 'any diagnosed vulnerability which may be impacted by this repair'</p>	<p>Changes to policies and process to allow for vulnerabilities which are not formally diagnosed.</p> <p>Supported by training for customer service and customer-facing colleagues.</p>	<ul style="list-style-type: none"> ✓ New Customer Vulnerability Policy, co-produced with colleagues and customers (approval due April 2024). ✓ OneProperty Technology Transformation ✓ Sanctuary Census ◇ Sanctuary Customer Relationship Management transformation ◇ Launch the new Customer Vulnerability Policy supported by communications and relevant training.
	<p>Existing mandatory training in customer service colleagues has good overall deployment, but requires refreshing based upon role specific requirements.</p>	<p>Implement wellbeing and empathy training for Inspections team (Surveyors)</p>	<ul style="list-style-type: none"> ✓ Wellbeing and empathy training. ✓ Crisis training. ✓ Safeguarding training. ◇ Implement wellbeing and empathy training for the Inspections team (Surveyors)
	<p>All Complaints team members are provided with complaint handling training based on HOS guidance however, this training needs strengthening to support the wider drive for greater professionalisation in Housing.</p> <p>Training on complaints for wider frontline teams is inconsistent</p>	<p>Source externally accredited training specific for complaints team roles (if available).</p> <p>Develop and implement new complaints training for frontline staff.</p> <p>Better use of HOS case studies as part of training and learning for frontline colleagues.</p>	<ul style="list-style-type: none"> ✓ Current in-house complaints handling training. ✓ New Complaints Operating Model. ✓ Skills gap analysis of Complaints team. ✓ 'Think customer' training (including the voice of the customer). ◇ Source externally accredited training for Complaints team. ◇ Develop and implement new complaints training for frontline staff. ◇ Use HOS Severe Maladministration case studies as part of training and learning for frontline colleagues to reinforce the importance of their role in preventing complaints.
	<p>System limitations mean that customer vulnerabilities are not easily recorded and not easily visible to</p>	<p>Improvement in record keeping, starting with improvement in system functionality to be able to</p>	<ul style="list-style-type: none"> ✓ Sanctuary Census. ✓ OneProperty Technology Transformation.

	colleagues accessing the customer records.	adequately store customer vulnerabilities.	◇ Sanctuary Customer Relationship Management transformation.
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✓ *Inflight projects*

◇ *New projects*

8.5 Conclusion

8.5.1 Sanctuary was already working with residents to develop a definition of vulnerabilities when the Housing Ombudsman Service made the determinations in these cases. Similarly, significant changes had been made to the complaints team to improve redress when things go wrong. Training had also been delivered to key teams to improve the customer journey. However, it is recognised that further improvements should be made to tailor services, especially for customers with vulnerabilities. The new 'Think Customer' training has been co-produced with the Resident Advisory panel to ensure the customer voice is at the heart of the training provided to colleagues on vulnerabilities. The delivery of a new Customer Relationship Management system will continue to improve the tailoring of services to customers' needs.

9. Review of similar cases

9.1 Introduction

9.1.1 Sanctuary has reviewed its records to determine if other customers could be similarly affected by issues similar to those involved in the two cases reviewed. This responds to Order 5b and 6c and 6d in case 202224898.

9.2 Methodology

9.2.1 Sanctuary has identified other customers who may have been impacted by similar issues between January 2020 and November 2023. To ensure a robust approach, systems and data have been reviewed to identify residents where there are other potential service delivery failures consistent with those in Case 202224898.

9.3 Findings

9.3.1 To make sure the approach to this review is thorough, and identifies all customers potentially impacted in a similar way, this review identified 3,823 customers who had reported potential roof leaks, since January 2020. To make sure the approach was both thorough and robust, the repairs histories of these cases were reviewed individually from start to finish. This included triangulation of both repairs and financial information to determine the timescales in which repairs had been completed.

9.3.2 The review of repair histories identified 236 potentially impacted homes where there is no evidence that roofing works were carried out in an efficient and timely manner. For these customers, the Group will review each case individually and consider whether compensation may be necessary on a case-by-case basis. Sanctuary will also apologise to any customer where works have not been completed as they should have been.

10. Conclusion

- 10.1 Sanctuary seeks to provide a high-quality service to customers every day. The findings of severe maladministration by the Ombudsman have resulted in this investigation report which has identified further areas for improvement whilst affirming that the plans already in place are addressing the majority of weaknesses and failings.
- 10.2 Importantly, this review reinforces Sanctuary's view that the learning culture put in place, allows the service to positively use complaints as a force to drive improvement. Early indications are that customer satisfaction is improving because of performance improvements within the repairs service and improved handling of complaints.
- 10.3 The Group recognises there is more to do and will continually strive to put customers at the heart of a local service. Where Sanctuary has fallen short of the service customers expect and deserve, it will continue to learn and improve.
- 10.4 Customers will remain key to the learning journey Sanctuary is on, working closely with the expanded members of the Group Housing Board, Resident Advisory and Scrutiny Panels as well as the broader engaged customer base of circa. 5,000 customers.
- 10.5 The Group welcomed the opportunity to carry out this review and share the findings with the Housing Ombudsman. Sanctuary's Resident Scrutiny Panel and Group Board will monitor progress against the detailed implementation plan.

Independent Housing Ombudsman Review

Case No. 202224898 and Case No. 202216547

Terms of Reference

1. Introduction

- 1.1 These terms of reference relate to the experiences of two customers, and subsequent Housing Ombudsman determinations of severe maladministration in relation to their complaints, under Case reference 202224898 and 202216547.
- 1.2 The key issues forming the context for this review are:
 - 1.2.1 The Housing Ombudsman has included a specific Order as part of the Severe Maladministration finding for Complaint 202224898. This requires Sanctuary to undertake a review of its failures within the Case, and more broadly its practice in relation to responding to customer requests for repairs arising as a result of leaks, and damp and mould. The finding also requires Sanctuary to identify residents affected by similar issues and identify appropriate redress. The Housing Ombudsman also requires Sanctuary to refer the outcome and conclusions of this review to the Group Board member responsible for complaints and the Group Board prior to its submission to the Ombudsman. The report and the resulting improvement plan will be reviewed by the Chairs of the Sanctuary Residents' Scrutiny Panel, the Sanctuary Residents Advisory Panel, the Group Housing Board and the Group Board. Subsequently it will be referred to the Group Board
 - 1.2.2 An additional Severe Maladministration determination was received by Sanctuary on 14 November 2023 for Case 202216547 in relation to Sanctuary's response to the resident's report of a leak and complaint handling. With the agreement of the Ombudsman this Case will also be incorporated into this review.
- 1.3 The two complaints included in this review (202224898 and 202216547) demonstrate several common failures in relation to the way the relevant repairs and the complaints about the responses were handled, including delays in repairs being completed, repairs not being escalated in a timely manner and the timeliness of such repairs, specifically in relation to damp and mould. In addition, these complaints highlight a risk of repairs being closed without works actually being completed or works not being carried out and appropriately tracked alongside complaint investigation.

Sanctuary

- 1.4 The Orders made for redress, such as compensation payments and apology letters, to the individual customers involved in the above complaints are being completed separately.
- 1.5 Sanctuary will consider and report on whether the current and recently improved ways of responding to damp and mould complaints are fit for purpose and whether the way repairs are handled is continually improving.
- 1.6 This review will address all of the issues raised in the Housing Ombudsman determinations, focussing on the causes of the failures, ensuring that the future approach is the right one to deliver positive customer outcomes.
- 1.7 A key theme to be considered in this review is also whether the current Sanctuary process adequately takes into consideration the diverse needs of customers, including those with vulnerabilities.

2. Approach

- 2.1 Sanctuary has developed 3 themes based on the Orders from the Ombudsman and the associated customer experiences. The work to be completed under each theme is set out below.
- 2.2 Theme One: Repairs - will be investigated by:
 - 2.2.1 A review of business information and key performance indicators on repairs performance from January 2020 to October 2023. This period has been chosen because the first issue was reported by the customer in January 2020 and October 2023 is when the determinations were made.
 - 2.2.2 Workshops to map the customer journey, customer feedback sessions to identify improvements at each stage from the customer's point of view, and a root cause analysis workshop with key stakeholders to identify system, process and staff failures.
 - 2.2.3 Assessment of the impact of the service improvements made from November 2022 (when Sanctuary's damp and mould taskforce started its work) and the wider North Star transformation programme (Sanctuary's customer first programme) introduced effective from December 2022.
 - 2.2.4 Scrutiny workshop with senior Directors and management within Property Services (including damp and mould). This is to make sure that those responsible for future delivery understand the detail of the failures highlighted by the cases so that they drive improvement in the areas highlighted.
- 2.3 Theme Two: Record keeping - will be assessed using the following methods:
 - 2.3.1 Review Sanctuary's record keeping for repairs taking more than 28 days and for complaints to ensure they are responding effectively and in appropriate timescales.
 - 2.3.2 Review recommendations from the independent report into Complaint Handling, conducted by Altair, commissioned in August 2023 with their final report pending.
 - 2.3.3 Review their Data and Analytics strategy to make sure it has sufficient focus on data quality to support robust reporting and handling of repairs and complaints.
 - 2.3.4 Review implementation of their action plan following Sanctuary's Knowledge and Information Management self-assessment (completed September 2023).

- 2.4 Theme Three: Vulnerabilities - will be investigated by:
 - 2.4.1 Reviewing current policy, process and accompanying training materials for the identification, assessment and support of customers with vulnerabilities.
 - 2.4.2 Assess whether their current and proposed changes to recording and sharing of information on vulnerabilities of their customers adequately protect them as appropriate, with particular reference to personalised outcomes for customers, ensuring that where improvements are in place they are fit for purpose.
 - 2.4.3 Reviewing the quality and frequency of the staff training delivered on repairs handling and customer vulnerabilities in the Sanctuary customer contact centre, whether it follows best practice, incorporates relevant learning from the cases covered in the review and drives a learning culture.
 - 2.4.4 Assessing the impact of the training delivered and its content against the outcome of root cause analysis to establish whether the areas of service failure are appropriately addressed in such training.
 - 2.4.5 Reviewing with staff the impact of training delivered and evaluation of such training.
- 2.5 Other residents who may have been affected by similar issues between January 2020 and present will be identified. To ensure a robust approach, systems and data will be reviewed to identify residents where there are other potential service delivery failures consistent with those in Case 202224898.

3. Final report

- 3.1 A final written report will be produced covering all themes identified:
 - 3.1.1 Key findings.
 - 3.1.2 Recommendations to address these findings, including where work is already under way, and robust but achievable timescales.
 - 3.1.3 Set out, with similar timescales, how the recommendations will be embedded, including whether this will be within existing transformation or work programmes or by establishing additional/new work programmes.
 - 3.1.4 Set out how the impact of such transformation will be measured and appropriate timescales for any follow up review.
 - 3.1.5 Clearly identify customers who have experienced similar issues and set out plans for redress
- 3.2 The final report will be provided to the Housing Board, the Group Board, the Resident Advisory Panel and the Resident Scrutiny Panel The Group Board and the Resident Scrutiny Panel will monitor the implementation of

recommendations arising from it. A copy will be provided to the Housing Ombudsman.

4. The Review team

- 4.1 The review will be overseen by Trudi Elliott (Vice Chair of Group Board and lead non-executive director for complaints), Jean McDonnell (Chair Resident Advisory Panel) and Bob Werrett (Chair of Resident Scrutiny Panel).
- 4.2 The review team members are listed in Table 1. They are not part of the day to day running of complaints or repairs.

Table 1 - Review team members

	Job Title	Role
Review lead: Nicole Seymour	Executive Director – Corporate Services	To ensure the review is managed with independence and relevant senior oversight, the review will be led by the Executive Member Responsible for Complaints (Nicole Seymour)
Robyn Cornelius	Head of Service Improvement	To lead an independent investigation identifying key areas of failure, with insight from Sanctuary’s involved residents.
David Onions	Head of Consumer Regulation and Engagement	To identify key points of failure in these Cases and undertake data analysis to identify the potential number of customers similarly affected by these failures over the defined period identified above
Alan Hughes	Senior Learning and Development Manager	To lead an independent investigation into the staff training needs within the repairs and complaints processes and teams

5. Timescales

5.1 The proposed timetable for the review is set out in Table 2.

Table 2 - Proposed timetable

Stage	Date
Discovery and workshops	November – December 2023
Analysis, follow-up and clarification	January 2023
Test emerging recommendations with residents and colleagues	January – February 2023
Develop recommendations and implementation plan	February 2023
Write final report, discuss with residents, and amend accordingly	February – March 2023
Group Board meeting to discuss report and implementation plan accordingly	27 March 2023
Submission to Housing Ombudsman	By 31 March 2024

Housing Ombudsman Determination Orders

The Orders received from the Housing Ombudsman Service relating to this review are listed in Table 1.

Table 1 - HOS Orders

Case No.202224898	
5	<p>In accordance with paragraph 54(f) of the Scheme, the landlord must carry out a review of its practice in relation to responding to requests for repairs due to leaks, damp and mould. The review should be conducted by a team independent of the service area responsible for the failings identified by this investigation and should include as a minimum (but is not limited to):</p> <ol style="list-style-type: none"> a. an exploration of why the failings identified by this investigation occurred b. identification of all other residents who may have been affected by similar issues, but not necessarily engaged with its complaint procedure, for a period from January 2020 to present c. a review of its staff's training needs to ensure all relevant officers: <ol style="list-style-type: none"> i. respond to requests for repairs appropriately, raises quotations for approval with major revenue, and progresses works orders involving more than 1 contractor in an efficient and timely manner, and in accordance with its relevant policies and procedures; ii. respond to formal complaints appropriately and keep complaints about ongoing outstanding issues open until their completion. Responses must provide completion timescales and should not require new complaints to be opened for the same ongoing outstanding issue. It should ensure all relevant officers do so in an efficient and timely manner, and in accordance with its relevant policies and procedures and the Ombudsman's complaint handling code <i>Note: Link Case No. 202216547 (6b)</i> d. a review of its record-keeping practices to ensure appropriate recording, handling, and responses to repairs taking longer than 28 days and formal complaints, and consider, if has not done so already, implementing a knowledge and information management strategy, in line with the Ombudsman's spotlight report on knowledge and information management.
6	<p>Following the review, the landlord should produce a report setting out:</p> <ol style="list-style-type: none"> a. the findings and learning from the review b. recommendations on how it intends to prevent similar failings from occurring in the future c. the number of other residents who have experienced similar issues d. the steps it proposes to take to provide redress at the earliest opportunity to the residents who have been similarly affected by the identified failings. This should include consideration of compensation commensurate to the level of detriment a particular resident has experienced if caused by a failing on the part of the landlord.

7	The landlord should embed the recommendations in the report within its wider transformation programme, to inform practice in other areas of service delivery, where relevant, with appropriate oversight.
8	The landlord should provide a copy of the final report to its governing body and member responsible for complaints, if appointed, for scrutiny. The governing body should agree how it will provide oversight of the implementation of any recommendations made following the review. The landlord should also provide a copy of the report to the Ombudsman
9	The landlord should commit to revisiting the issues 6 months after the report has been finalised to check whether changes in practice have been embedded.
Case No. 202216547	
6	<p>In accordance with paragraph 54(f) of the Housing Ombudsman Scheme, the landlord is ordered to carry out a review of the failings identified above in its response to the resident's vulnerabilities as follows:</p> <ol style="list-style-type: none"> a. The review should be conducted by a team independent of the service area responsible for the failings identified by this investigation. b. The review should include but not be limited to consideration of: <ol style="list-style-type: none"> i. How it assessed or failed to identify the resident's particular needs. ii. How it responded to notice by the resident of her needs or cited adverse impact to health. iii. The formulation of a policy/ procedure that covers responding to customer vulnerabilities. c. The review team should prepare a report setting out its findings and learning and the actions recommended to prevent recurrence of similar failings. A copy of the report is to be provided to the Ombudsman within 8 weeks of the date of this determination. d. The landlord may combine this review with the wider review being undertaken ordered as part of case 202224898, subject to the prior approval of this Service. Should the landlord wish to combine reviews, it must: <ol style="list-style-type: none"> i. Ensure the assessment of its approach to handling customer vulnerabilities is not confined only to cases relating to damp and mould; ii. Outline to this Service for approval within 4 weeks of the date of this decision the proposed terms of reference for incorporating this review into the wider review.