

Stonewater Annual Complaints Performance and Service Improvement 23/24

1. INTRODUCTION

- 1.1 In April 2024, the HOS introduced an updated Complaint Handling Code. The new Code is a statutory requirement for social landlords. It outlines new expectations, including the requirement to submit a new annual complaints performance and service improvement report to the HOS by 30th June 2024. This must also be simultaneously published on our Stonewater Group websites.
- 1.2 This annual complaints performance and service improvement report brings together Stonewater Group, including Stonewater, Greenoak and Mount Green's complaint performance in 2023/24. As Mount Green joined the Stonewater Group in January 2024, Mount Green's performance is reported separately from Stonewater and Greenoak. For 2024/25, we will report all data as a Group, reflecting our adoption from May 2024 of a joined-up group-wide policy.
- 1.3 The HOS' new Code includes requirements, which were introduced from April 2024. New requirements are highlighted within the report.

2. CONTEXT

- 2.1 This annual complaints performance and service improvement report replaces Stonewater's previous annual complaints outturn report. The report covers:
 - the annual self-assessment against the HOS Code to ensure our complaint handling policy remains in line with its requirements.
 - a qualitative and quantitative analysis of our complaint handling performance, including a summary of the types of complaints we've refused to accept;
 - any findings of non-compliance with the Code by the HOS;
 - the service improvements made as a result of the learning from complaints
 - any annual report about the landlord's performance from the HOS
 - any other relevant reports or publications produced by the HOS in relation to the work of the landlord
- 2.2 As part of compliance with the new Code, the Board is also expected to publish its response to this report.
- 2.3 Our previous self-assessment is provided in Appendices 1-4 (available in the background papers on Convene), which covered compliance with the Code for the 2023/24 period. The self-assessment demonstrated our compliance with all areas of the Code in place at the time.
- 2.4 Stonewater has now produced an updated self-assessment against the new Code, launched on 1st April 2024, and as a requirement of our merger with Mount Green. This is provided as Appendices 5-7 (available in the background papers on Convene), and will be approved by the Group Board April 2024.

3. STONEWATER AND GREENOAK COMPLAINTS

3.1 The sector has seen a trend of year-on-year increases with which Stonewater is consistent and our annual numbers are set out in a table below. External factors influencing this include, media attention on the sector as a result of Grenfell and the death of Awaab Ishak, government campaigns promoting the opportunity for customers to complain, the narrative from the HOS and powers given to them, and a shift in the consumer climate impacting multiple sectors.

Year	Formal complaints
2023/24	3870
2022/23	2572
2021/22	1844
2020/21	854
2019/20	365

Across the sector, the HOS reported a 91% increase in cases in 2023/2024, and has predicted an additional increase in demand between 50% and 80% for 2024/2025.

Stonewater will need to prepare so that each service has the capacity to investigate and respond to higher numbers, as well as to implement learning.

3.2 Complaints received per 1000 properties is part of our historic suite of risk appetite KPIs. The threshold was raised from 12 to 20 complaints in November 2022. We are now consistently above that threshold, though this is not seen as a negative by the HOS. The emphasis of the HOS is an easy to access complaint process and quality complaint handling.

3.3 Stonewater achieved 80% in time responses for both stage 1 and stage 2 complaints.

3.4 At stage 1:

- 2526 (65%) complaints relate to repairs. This includes gas, planned and communal.
- 765 (20%) complaints related to Estate Services and associated Service Charge complaints (requests for refunds). This is a 372% increase on the previous year.
- 4% related to ASB case handling
- 4% related to the handling of fly tipping, tenancy and neighbourhood issues (excluding ASB), parking and pest control.
- 2% related to rent/service charge amounts, such as apportionment, refunds and delays in requests for information.
- >1% of complaints related to retirement living services (excluding ASB or repairs).

- >1% were recorded as Development outstanding defects. This may be higher if some are recorded under repair categories.
- >1% related to the Customer Service Centre.

3.5 At stage 2:

- 586 (62%) related to Repairs. This amounts to 23% of all repair related stage 1 complaints being escalated to stage 2.
- 177 (19%) related to Estates Services. This is 23% of all Estates service stage 1 complaints.
- 60 (6%) related to ASB. This is 39% of stage ones for ASB showing the highest dissatisfaction and escalation of complaints from stage 1.
- 31 (3%) related to Service Charges. 7 of these were specific to communal electricity charges. Others related to apportionment, requesting invoices to justify increases and accuracy of letters.

3.6 The new HOS Code, from 1 April 2024, has introduced recording and reporting requirement on rejected complaints. We put systems in place to capture this information from October 2023.

10 cases were formally rejected as complaints:

- 3 were outside jurisdiction as they related to services we did not provide.
- 1 related to a complaint regarding lack of a policy. This was treated as feedback.
- 2 were historic cases, over 2 years old, which had already been through the complaint process at various stages.
- 1 was treated as a new ASB report.
- 3 related to a staffing matter that was better investigated under HR policy in the first instance.

3.7 HOS determinations are a key performance indicator for the business and cases are reviewed bi-monthly by CX CAP. In 2023/24, we received the following findings (this includes findings from stage 1s logged in previous financial years):

Total determinations received (number of cases completing HOS investigation)	40
Total number of findings across 40 determinations	102
Breakdown of findings:	
Severe maladministration	7
Maladministration	44
Service failure	19

Reasonable redress	23
No maladministration	9

3.8 We have received negative findings for 31 out of 40 cases for 2023/24. This is equivalent to 0.7 of all stage one cases leading to a negative HOS determination, against our target of 0.5%. Currently, our maladministration rate is 69%, compared to 48% in 2022/23.

3.9 Of the service failure and maladministration findings:

- 60% related to repairs
- 13% related to anti-social behaviour (ASB)
- 13% related to service charges (e.g. estate services)

3.10 In terms of direct communication from the HOS:

- The HOS didn't publish an annual report about our performance for 2023/24.
- The HOS Quarter 1 Complaint Handling Failure Order report commended Stonewater for best practice in its approach to managing complaints through our merger with Greenoak Housing. In particular, the report highlighted the successful use of the self-assessment to ensure complaint services were prioritised through our new partnership.
- The HOS didn't publish any additional reports or publications in relation to Stonewater's work.

3.11 Transactional customer satisfaction with complaint handling remained below target throughout the year, finishing 40% against a target of 60%. However, we saw an improvement in performance across quarter 4, linked to improvements in complaints sent on time. We recognise that improvement is needed in respect of the timeliness of complaint responses and ensuring the customer feels heard to further improve the satisfaction. Positive feedback from a customer participating in the survey include:
"..we kept them informed." and "the case owner kept in contact throughout every stage. Was very thorough, and gave a positive experience"

3.12 The Tenant Satisfaction Measure (TSM) for complaints 2023/24 is only 28% of customers satisfied. The TSM survey is a perception survey, rather than transaction based, and this finding now needs to feed into a revised Customer Strategy.

3.13 From December 2023 a new complaints compensation policy and process has been in use. This process was audited and received substantial assurance with no management recommendations.

4. STONEWATER AND GREENOAK COMPLAINT LEARNING

4.1 Learning from complaints is an organisational priority. Across all complaint categories we recognized that the rate of conversion to stage 2 complaints is too high. We have implemented our 'complaint commitment tracker', which means commitments in complaint letters get tracked in a system and monitored via dashboards, which should prevent unnecessary escalation through lack of action.

4.2 For every HOS determination, we undertake a reflective learning session with operational colleagues and directors to identify service improvements. The learning actions feed into the organisational Customer Service Action Plan, with delivery monitored and reviewed once a quarter by the Chief Officer Group. Learning themes have included:

- Customers feel that we do not keep them up to date on the progress of their repairs even if they are delayed
- Records are not up to date causing customers to have to repeat themselves
- A lack of trust due to service areas not following through on commitments
- Customers receiving late, poor or incomplete responses to their complaints causing dissatisfaction and feelings of not being listened to
- Services not fully taking account of individual circumstances and vulnerabilities, causing customers to feel excluded or not listened to

4.3 Repairs

Repairs-related complaints steadily declined from Q1-Q3, both in terms of numbers and in terms of % of overall complaints. They rose again during Q4 due to winter weather related repair issues. Repairs remains the highest driver of complaints and is a key area for learning and improvement.

Several complaints highlighted issues with ownership of the complaints process by our contractor partners. As a result we have worked with our four main repairs and maintenance contractors to introduce Customer Liaison Officers, who investigate and action complaints accordingly.

Learning exercises also identified issues when repairs are closed in the system at a point when the customer still requires further work to be book/ completed. We are now sending text messages to customers as contractors complete jobs in our systems to identify follow on works that have not been booked and to identify where contractors may not have had access issues to ensure jobs are re-booked.

Increase in repairs relating to damp and mould led to the creation of a specific Damp and Mould team in October 2023. A team of customer partners and surveyor now triage all cases, identify the risk and vulnerabilities which may not have been identified at first point of contact, and manage case loads. We received only 23 complaints about damp and mould from November 2023 onwards.

4.4 Estates Services

A re-procurement exercise that mobilised during the growing system resulted in a number of issues in ensuring customers received a consistent service in terms of frequency and quality of service. Several learning exercises have been completed in response to the issues that occurred and a working group has brought about several critical changes ready for the growing season 2024.

A new manager was recruited in January 2024 to focus on:

- Accuracy of map data informing contract areas
- Quality of service and compliance of visits

In addition, a new customer reporting tool with automated workflows direct to contractors and feedback loops to the customer has gone live in April 2024. The

team responsible will now have full oversight of customer reports and the tracking to ensure we do not respond in a timely way.

4.5 Complaint Handling

A report in March 2023 provided evidence for increasing resource in our Stonewater Customer Relations Team (CRT) to meet the growing demand and increase the quality of complaint handling. In terms of quantum this includes a rise from 2572 complaints in 2022/23 to 3870 in 2023/24 on top of increases in the three years prior to that. The complexity of many issues has also risen as well as additional contact from the HOS. Across the business the CRT are monitoring action plans to ensure we meet the requirements of the self-assessment and maintain our compliance with the complaints handling code.

- The team has increased 50% since a restructure in July 2023 and an increase in compliance in response times has been achieved. Internal and external training has been delivered to the team on repairs, construction, customer service skills, letter writing, and the changes in the Housing Ombudsman Code and regulations.
- Each case handler is subject to a minimum of 3 quality monitoring checks each month to look at a random sample of complaints.
- Bespoke monitoring software has been created to give the business oversight of all upcoming complaint response dates and ensure customers receive a better service and complaints are responded to on time.
- Recruitment and training has been a challenge, with most other housing providers also recruiting to complaint roles to cover the increase in demand and it being a competitive market in general.

5. MOUNT GREEN COMPLAINTS

- 5.1 In 2023/24 Mount Green received 231 stage 1 complaints. Of these, 56 were escalated to stage 2 and 24 of those became stage 3 complaints. From April 2024 Mount Green will no longer implement a third complaint stage, in line with HOS guidelines.
- 5.2 94% of stage 1 complaints were responded to in time. Only one stage 2 complaint was answered late.
- 5.3 At stage 1:
- 71% of complaints were repair related
 - 10% related to neighbourhood issues
 - 6% related to income collection
- 5.4 At stage 2:
- 62% of complaints were repair related
 - 11% related to neighbourhood issues
 - 11% related to income collection
- 5.5 Mount Green did not record formally rejected complaints in 2023/24. This will be recorded from April in line with Housing Ombudsman guidelines.
- 5.6 The HOS made no findings of Mount Green non-compliance with the Code.

5.7 In 2023/24, Mount Green received the following HOS findings (this includes findings from stage 1s logged in previous financial years):

Total Determinations Received (No of cases completing HOS investigation)	3
Total number of findings across 3 determinations	4
Breakdown of findings:	
Severe Maladministration	0
Maladministration	2
Service Failure	1
Reasonable Redress	0
No Maladministration	1

Mount Green's maladministration rate was 75%. Service failure and maladministration was found relating to:

- Advice given relating to a tenancy agreement
- Repairs

5.8 The HOS didn't publish an annual report about Mount Green's performance for 2023/24. The HOS didn't publish any additional reports or publications in relation to Mount Green's work.

5.9 30% of customers reported as satisfied with Mount Green's complaint handling in the Tenant Satisfaction Measure survey.

6. MOUNT GREEN COMPLAINT LEARNING

6.1 Key learning from complaints has included:

- Completing 1000 assessments and agreeing action plans with customers at the earliest opportunity and communicating with customers regularly to keep them updated.
- Review the management move process, ensuring any conditions of the process/ application for a management move is made clear to all parties.
- Employment of an estate services officer to monitor and carry out estate checks to resolve contract issues.
- Recruitment of a surveyor to conduct a programme of checks to fire doors.
- Use of an improvement plan for the main repairs contractor. The Customer Experience Team now meet biweekly with Gilmartins to run through outstanding issues for residents and any repair related complaints to improve the communication between Mount Green and Gilmartins.
- Improvements to the record keeping of the damp and mould process has been achieved with new training and guidance.

6.2 Mount Green have taken a number of steps to improve the formal complaints process:

- Reviewed decision making for compensation awards after the HOS highlighted that Mount Green had not offered compensation for distress and inconvenience caused in two cases. A step has now been included within the complaint checklist to flag this to investigating officers to address this.

- To ensure we are answering and addressing every element of a resident complaint, the procedure now specifically flags this to investigating officers.
- Training and inclusion in the new checklist has addressed the need to better consider a resident's vulnerabilities when reviewing a complaint and compensation.