

Item: 06	Date of report: 11 November 2025 & Dec 2025
Report to: PCC	From: Bill Flood Director of Operations and Alison Brown Directors of Operations (Dec25)

For approval		For discussion/ scrutiny	X	For noting	
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Annual Complaints Performance 2024/25

1. Executive Summary

- 1.1. The Housing Ombudsman (HOS) requires all RPs to submit the annual complaint handling self-assessment along with an annual complaint performance report that has been scrutinised by Board.
- 1.2. This report gives a breakdown of our complaints handling report for both Q4 and for the whole of Housing for Women (HFW) reporting year which is October 2024 to September 2025
- 1.3. Our annual complaint handling self-assessment is due to be submitted by January 2026 which is within 6 months of the end of the HFW financial year. We recognise that 2024/25 was a year of instability in terms of complaints management. There had been some positive progress in the early part of the first half of the year but instability and capacity issues from staffing changes has undermined some of the positive steps taken resulting in residents who have had cause to complain about; the services provided by HFW, not consistently received timely information about complaint handling and follow up in ensuring suggested remedies and actions were fully implemented.
- 1.4. Attached to this overarching complaint performance paper is the self-assessment against the HOS Complaints Handling Code. The self-assessment which was completed in December 2025 has highlighted a number of areas that HFW cannot demonstrate full compliance against the activity requirements in the code. These are being addressed through the 2025/26 Complaints Action Plan.
- 1.5. A further review of the HFW complaints policy, process and standard operating procedures and revised performance framework reflect recommendations from the HOS, sent in August 2025, learning from Ombudsman determinations, Spotlight and Insight reports, and Complaint Handling Failure Notices.
- 1.5. This report includes a summary of numbers and outcome for complaints, HOS cases and contact demand management. HFW handling of complaints for 2024/25 remains disappointing. Using the data available 76% of complaints were responded to within the complaint handling code timeline which is 23% below the HFW tolerance target for 24/25.
- 1.6. Property related matters saw the highest number of complaints in the year with around three-quarters of all complaints, followed by customer services and estate management. Issues relating to our properties and contractors make up the key primary complaints categories.
- 1.7. Visibility of our response to HOS cases during the year has deteriorated as cases stopped being logged in HomeMaster and the HOS portal has no reporting facility. We have included information from the HOS own report on HFW. This issue is being addressed as part of 2025/26 Complaints and learning improvement plan
- 1.8. The previous annual report included a complaints improvement plan for 2024/25 which was reported as largely complete (over 70%) and outstanding actions were added to the Operations Improvement Plan 2024/25 to provide just one plan to track all improvement plan actions. Of the outstanding 5 actions remaining, one has been completed – staff training and the other on using HomeMaster to store documentation and evidence produced during the complaint handling process, is being progressed meaning the plan is around 82% complete. At the end of the HFW financial year actions linked to the customer engagement elements around a focus group, having a customer panel to review complaints and undertaking a customer complaints review. An update on these actions was provided in the Operations SIP October 25 update and due to staff changes remain outstanding as at December 2025.
- 1.9. It should be noted that work still needs to be done to ensure that the improvements from the 2024/25 complaints improvement plan are fully embedded into day-to-day actions across the landlord service and having a positive impact on customer experiences.
- 1.10. To conclude, we recognise that during 2025/26 further improvement to the efficiency and effectiveness of policy, procedures and the complaints performance framework are needed. This is required to provide evidence and assurance HFW fully complies with the HOS Complaint Handling Code and customers who raise concerns about HFW's services experience a complaints process that is fair, accessible, safe, and trauma informed.

2. Impact

Impact on Risk	Complaints management is key to ensuring we resolve issues quickly for customers and complaints are handled fairly, transparently, and consistently.
Impact on Customer	Learning from complaints is key to ensuring services are improved. We view complaints as a vital safeguard for residents' rights and a valuable source of feedback and learning.
Impact on Budget/Cost	Effective complaints management helps reduce the cost of failure investigations and repeat issues. Any financial Redress including compensation will reflect HFW Compensation Policy and the Housing Ombudsmen categorisation of severity of the impact between minor, moderate and severe.
Impact on Value for Money	Complaints management is key to reduce waste and duplication, it is also key to achieving customer satisfaction and right first time.
Impact (other – define)	NA

3. Recommendation

It is recommended that members;

- a) acknowledge that during 2024/25 the operating context and HFW operational team experienced senior leadership and management turnover, which has had an impact on aspects of complaint handling, including response times and the consistency of audit trails.
- b) Note the progress on the 2024/25 complaints improvement plan and remaining actions
- c) Review and approve HFW's:
 - i) Annual self-assessment against the HOS complaint handling code 2024/25
 - ii) Complaints Action Plan for 2025/26
 - iii) revised complaints policy to better align with the requirements of the code that reflect feedback from the Housing ombudsmen in August 2025 and learning from the HOS spotlight reports
 - iv) Agree which member of the PCC should be the Member Responsible for Complaints ('the MRC').
 - v) The board response statement to be provided to the HOS
- d) Note HFW's performance around complaint handling from tenants and the HOS for 2024/25 including comments about data quality and integrity

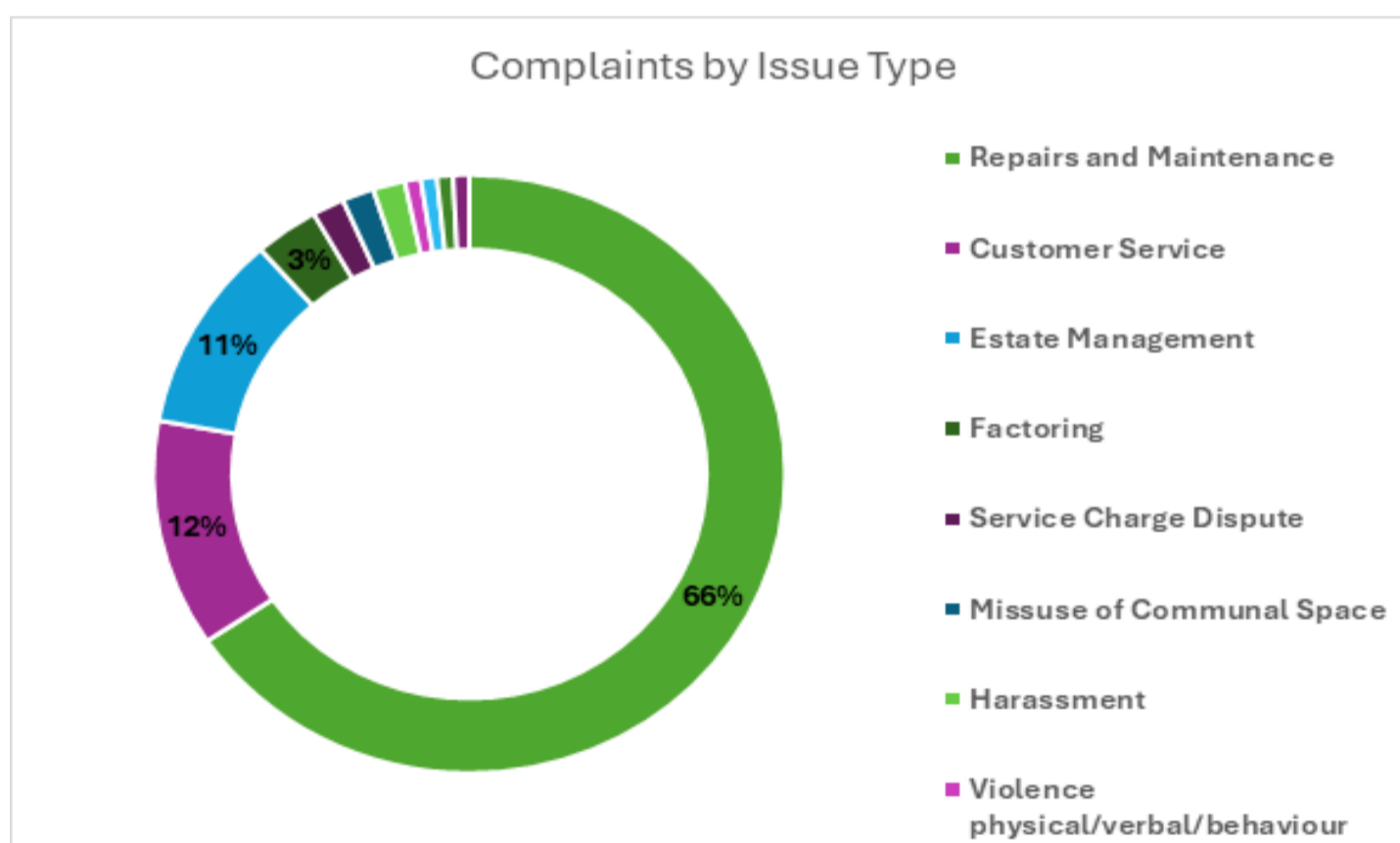
4. HOS Complaint Handling Code Compliance

There are several areas as detailed in the self-assessment for 2024/25 where HFW do not fully comply with the requirements of the Housing Ombudsmen service (HOS) Complaints handling code. This is primarily around our complaints policy and process, customer communication, data management and integrity and in part contributed to the operating context that occurred during the year (see summary in appendix 1). Following a severe maladministration order against HFW in April 2024 a number of positive changes were made to the way that HFW managed complaints including staff training, allocation of specific complaints handling staff, revised complaint response letters. In June 2024 the complaints policy was reviewed. The updated policy was presented to the HOS service who provided feedback in August 2025. The HOS identified a further 20 suggested recommendations to ensure the HFW complaints policy complied with the complaint handling code. A revised complaints policy is included in appendix 3 which has incorporated the HOS recommendations and now fully reflects the complaints handling code and positive practice as identified in the HOS spotlight reports. Other activities include for example a revised complaints procedure, revised performance dashboard, revised complaint letters. Further details are included in the 2025/26 complaints improvement plan in appendix 4. A request has been made to the Housing Ombudsmen to discuss our proposed approach to improve the way we manage complaints handling in line with the national complaints code.

5. Complaints Management

5.1. Information about our complaint performance during the year is not comprehensive and we have when putting data together for this report identified concerns around data quality and integrity. Information in this report is provided in this context.

5.2. Analysis of primary complaint categories for 2024/25 show the most common category of complaints is for repairs and maintenance, customer service, and estate management, making up 90% of our complaints.



5.3. Repairs and maintenance generated the highest number of complaints in the year with 66% of our complaints being related to repairs and maintenance. There are multiple factors that are impacting on this. Management of contractors through the year has been variable partly linked to staff turnover an instability across the operations team. In May 2025 a new repairs contractor was mobilised following the previous incumbent going into receivership. The outgoing contractor has left a legacy of issues that are still coming to light. The new contract although mobilised is still a significant way from being effective and HFW is still to establish automated data transfer so is heavily reliant upon contacting the contractor verbally to get updates on the current situation in work orders. This is leading to a frustration from customers and staff.

5.4. Having look at some of the complaints a number relate to more significant replacement or improvement works required in the property. As we currently have no formal capital programme, we are unable to meet expectations of customers about their homes. Other complaints reflect issues linked to communal areas. Again, these contracts were re tendered during the year and changes made to the specification for cleans and ground maintenance which will be used to manage quality and performance. These complaint themes are also reflected in the perception measures of the TSM with 61 % of respondents saying that they were satisfied with the repairs over the last 12 months. Although this measure has seen a slight increase in the second survey of the year it was only minimal.

6. Complaint handling

6.1. The table below shows HFW performance on repairs using the complaints handling code and tenants satisfaction measures for complaints.

Measure	H4W	Benchmarking against Social Housing Regulator 24/25
CH01 Complaints relative to the size of the landlord - <u>Stage one</u> (per 1000 homes)	116	Higher than upper quartile of 72.2
CH01 Complaints relative to the size of the landlord - <u>Stage two</u> (per 1000 homes)	21	Higher than upper quartile of 13.6
CH02 Complaints responded to within CHC timescales - <u>Stage one</u> %	83%	We are higher than the lower quartile of 72.8%, but below median of 89.9%
Of these, what proportion required extensions (of up to 10 days as permitted in the code) (%) *	29%	We are higher than the upper quartile of 23.4%
CH02 Complaints responded to within CHC timescales - <u>Stage two</u> %	53%	We are lower than the lower quartile of 70.4%
Of these, what proportion required extensions (of up to 20 days as permitted in the code) (%) *	42%	We are higher than the upper quartile of 28.6%
TP06 - Proportion of respondents who report that they are satisfied that their landlord listens to tenant views and acts upon them	42	We are lower than the lower quartile of 54.1
TP07 - Proportion of respondents who report that they are satisfied that their landlord keeps them informed about things that matter to them	45	We are lower than the lower quartile of 65.9
TP08 - Proportion of respondents who report that they agree their landlord treats them fairly and with respect	55	We are lower than the lower quartile of 72.6
TP09 - Proportion of respondents who report making a complaint in the last 12 months who are satisfied with their landlord's approach to complaints handling	27	We are lower than the lower quartile of 29.6

Note: The latest tenant satisfaction survey was completed in December 2024.

6.2. *Complaint Extensions: 8% of our stage 1 complaints had extensions outside the period of 10 days, and 5% of our stage 2 complaints had extensions outside the period of 20 days which is outside of expected HOS timescales. CH02 figures will be inflated by high extension days. Customers were not being effectively communicated with regarding extensions and the reasons extensions were required.

7. Stage 1 complaints

STAGE 1	Q1	Q2	Q3	Q4	24/25
Complaints Received Actual	33	16	26	28	103
CH01 Complaints Received per 1000 Homes*	37	18	29	31	116
WITHOUT Extension					
Complaints meeting handling code timescales	21	14	19	13	67
CH02 Complaints meeting handling code timescales %	64%	88%	73%	46%	65%
WITH Extension					
Complaints meeting handling code timescales	29	14	22	20	85
CH02 Complaints meeting handling code timescales %	88%	88%	85%	71%	83%

7.1. The number of stage one complaints in Q4 was similar to Q3 but the time taken to respond deteriorated we have not met either our target or agreed tolerance levels. The overall number of stage 1 complaints has reduced compared to 2023/24 figures where customers made 189 stage 1 complaints.

8. Stage 2 complaints

STAGE 2	Q1	Q2	Q3	Q4	24/25
Complaints Received Actual	7	5	3	4	19
CH01 Complaints Received per 1000 Homes*	8	6	3	4	21
WITHOUT Extension					
Complaints meeting handling code timescales	2	2	0	2	6
CH02 Complaints meeting handling code timescales %	29%	40%	0%	50%	32%

WITH Extension					
Complaints meeting handling code timescales	5	2	1	2	10
CH02 Complaints meeting handling code timescales %	71%	40%	33%	50%	53%

8.1. *Uses 891 properties as number of homes owned, so (first row / 891)*1000

8.2. **Note:** In 2024/25 we had been using 30 days as the acceptable extension timeline for stage 2 complaint response which is outside of the HOS complaint handling timescale of 20 day extension period.

8.3. The overall number of cases escalated to stage 2 complaints has reduced compared to 2023/24 where we recorded 36 stage 2 complaints.

9. Complaint Decisions

9.1. HOS Case management workflow which was mobilised as a system development in 2024-25 has not been fully embedded in day-to-day activities. We have not consistently updated the HomeMaster system with the outcome of complaint and whether actions and remedies agreed were fully implemented.

	Upheld	Partially Upheld	Not Upheld	Total
Stage 1	33	21	22	103
Stage 2	6	4	2	19

9.2. Feedback from customers through the TSM data identified customers were dissatisfied about our approach to handling complaints. Actions around improving data quality and integrity and manging remedies and actions until conclusion are actions on the 2025/26 complaints learning and improvement plan.

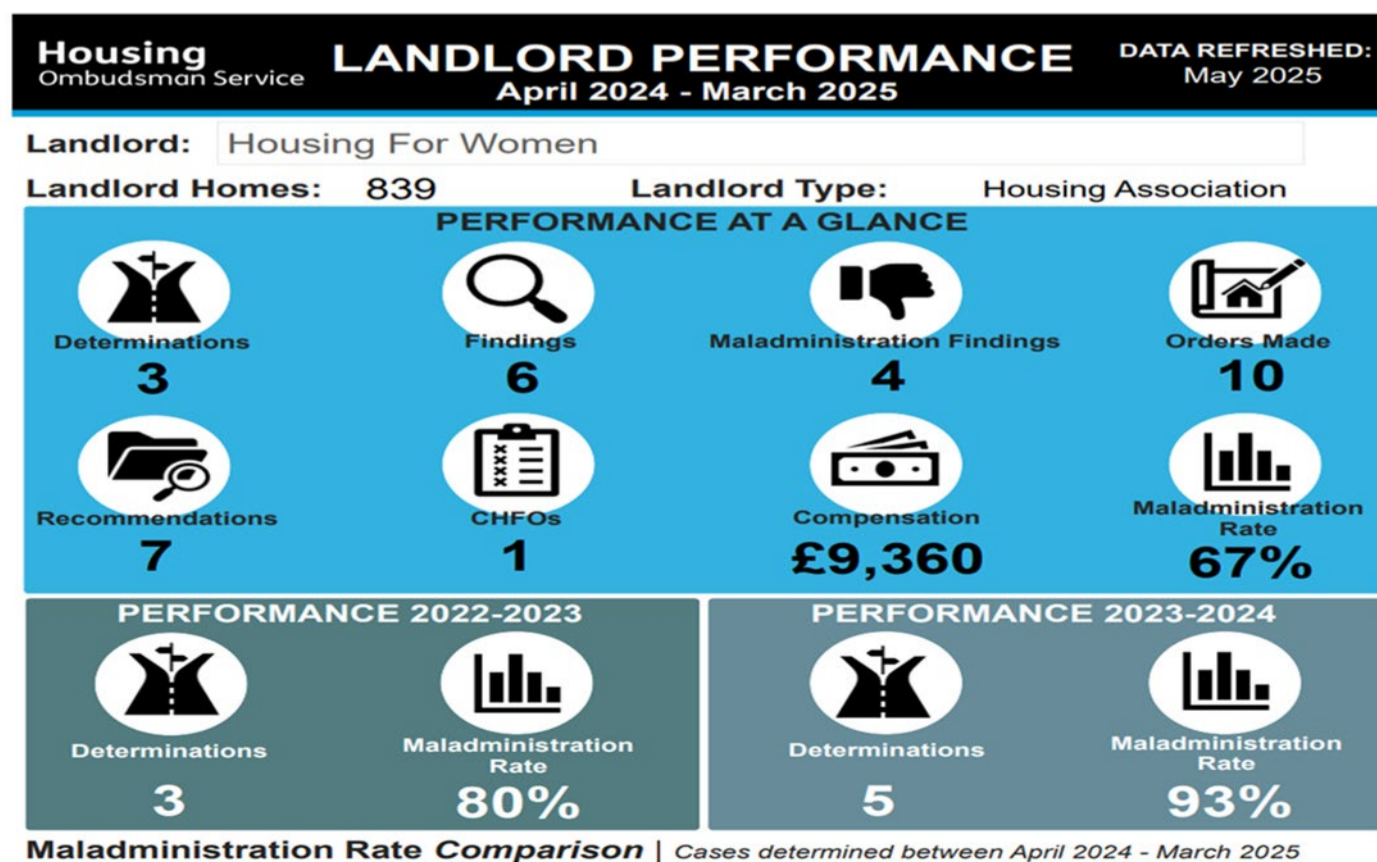
10. Ombudsman (HOS) case management and MP enquiries

10.1. The performance across the year for, MP enquiries and HOS cases are set out below across the year.

Type	Qtr. 1	Qtr. 2	Qtr.3	Qtr. 4	24/25
MP Enquiries					
Ne Ombudsman Cases	0	0	2	5	7*
Ombudsman cases resolved	0	0	1	5	6
Ombudsman cases resulting in maladministration	0	0	1	0	1

10.2. During the year HOS cases stopped being recorded on HomeMaster So figures are not comprehensive as based on data available at this point through HomeMaster. The instruction has been given to ensure all new cases are logged on HomeMaster and a follow up exercise will be done to ensure that the information on HomeMaster is brought up to date. There is no reporting facility in the HOS portal, and you have to go in an out of each case to see when it was originally reported. There are 18 cases in the portal showing as closed during the HFW 2024/25 year.

10.3. The HOS report below shows HFW 's performance between April and March 24 which is different from our own internal reporting dates. Performance over the last three years show that although determinations have remained fairly similar the maladministration findings against us has reduced. One of the key areas from the HOS findings are from the way that HFW has managed and handled the complaints made to us by customers.



An action in the complaints action plan 2026/27 is to review or approach to data collection and analysis to ensure we are collecting appropriate data consistently to help identify learning

11. MP Enquiries

- 11.1. Issue with data quality. Of the data available most of the issues raised by MP's relate to property matters with an average of 11 days for a response

MP Enquiries	Qtr.1	Qtr. 2	Qtr.3	Qtr. 4	24/25
Volume	8	2	5	4	19*
Completed in time	na	na	na	na	na

12. Lessons learnt.

- 12.1. Feedback from customers in QTR 4 has focused lessons learnt in the following areas:

Issue	Learning	Mitigation
Service charge dispute	Ensure that are records up to date and the correct information is on HomeMaster	Service charge information continues to be amended and updated on the system

- 12.2. Over the year the feedback from customers through complaints has focused lessons learnt in the following areas:

- Repairs and Maintenance
- Customer contact and response times
- Anti-social behaviour
- Damp and Mould
- Service Charges

- 12.3. To ensure that we are using lessons learnt to improve services the table below details some of the improvements HFW have made during the year however work still need to be done to fully embed changes into standard operating practices.

Area of complaint	Service Improvement
Customer Contact and Response	Head of Housing as put in place a system that means that a CST member is always on duty and request has been made for additional licences so additional cover can also be provided by the housing team
Repairs contractor performance	Introduced contractor performance meetings to the new repairs contract
Damp and mould	Introduced a prioritisation process with key repairs contractor
Service Charges	Amended property information on our housing management system where cases identified.
Anti- social behaviour	Policy has been reviewed and processes and training for all housing management staff are to developed and rolled

13. Learning from the Housing Ombudsmen

Learning from Housing Ombudsmen as part of the self-assessment against the HOS complaint handling code is summarised below:

- a. **Complaints Stages:** The HOS consistently identifies delay, poor communication, lack of clarity about complaint scope, failure to consider vulnerability, and inadequate updates as key drivers of maladministration. Spotlight reports emphasise the need for timely responses, agreed extensions, clear escalation routes, and empathy. Housing for Women has reviewed this learning by reviewing its approach to monitoring timescales, agreeing extensions with residents, issuing responses when decisions are known, and explicitly considering risk, safeguarding and vulnerability when handling complaints, in line with the Tenant Involvement and Empowerment Consumer Standard as part of revised complaints policy, procedures and standard operating practices and performance framework.
- b. **Response Timescales:** Housing for Women has been issued with several Complaint Handling Failure Notices by the HOS, primarily linked to delays and weaknesses in oversight during a period of senior leadership and management turnover. This learning reflects sector-wide maladministration findings. Permanent senior staff are now in post, processes and templates have been reviewed, and performance against timescales is monitored closely and reported quarterly to senior management and the governing body.
- c. **Putting Things Right:** HOS determinations repeatedly highlight maladministration where landlords fail to acknowledge fault, focus on process rather than resident impact, or offer remedies that do not reflect distress, inconvenience or time and trouble. Spotlight reports reinforce the importance of clear apologies, proportionate remedies, and follow-through. Housing for Women will be revising its approach to remedies by linking remedies to resident impact, using HOS guidance when considering compensation, and tracking agreed actions to completion. This is reflected in an action of strengthening of impact-based

remedies in the 2026/27 complaints improvement plan. As part of the new approach in 2025/26 to complaints management each complaint will have a learning point logged in HomeMaster. Part of the review of the process is to introduce a quality assurance step which includes a review of proposed remedies and action for the resolution of each complaint. This will help provide greater visibility of lessons learnt and improved assurance that the learning has been implemented into operational practices.

- d. **Self-Assessment, Reporting and Compliance;** Insight reports stress that ineffective self-assessment, lack of transparency, and ownership undermine complaint handling. The HOS expects honest reflection, publication, and evidence of learning. Housing for Women reflects this learning through annual self-assessment which has identified gaps in our approach. HFW will issue an apology to our customers for the issues that have occurred in 2024/25 alongside the publication of complaints performance reports. HFW are incorporating ion of HOS findings and sector learning into service improvement planning, consistent with the Housing Consumer Standards.

Appendix 1 - Learning from Annual self-assessment against the HOS CHC

Housing for Women recognises that 2024/25 was a year of instability in terms of the complaints management. The severe maladministration determination in April 2024 prompted a series of positive changes in the way HFW managed complaints including :

- The complaints policy was reviewed and will be presented to ET and the People and communities Committee to approve.
- A new equality impact assessment on the Complaints Policy was completed
- Staff attended workshops on shaping the complaints policy and process resulting in revised suite of letters against the two complaint stages
- staff attended workshops on customer first approach and putting themselves in the tenants shoes
- amendments to the configuration of HomeMaster (HFW management system) to reflect agreed changes in approach
- Complaints being managed by the Customer service team
- quarterly performance information was being presented to the PCC and included in the tenant newsletter
- Ongoing liaison with the HOS at a senior level

However, HFW in tandem experienced in rapid succession a turnover of staff at Director and Manager level including teams with direct responsibility for day-to-day management of the internal and HOS complaints process. This period of instability had a temporary impact on aspects of complaint handling, including:

- Different approach to leadership and direction
- The extent that the new complaints policy and process was fully embedded into day-to-day activities
- Reduction in capacity to carry out complaints management across a small overall operations team
- Uncertainty of roles and responsibilities for ownership and accountability of complaints management in the residual structure has led to senior staff getting involved at stage 1 complaints, requests for information from HOS not being responded to within timescales, receiving multiple complaint handling failure notices.
- Some complaints were responded to was outside of agreed targets, extensions were being requested due to capacity of resources, and the quality of response to customers was variable.
- Consistency of senior oversight and decision-making due to multiple staff changes
- The clarity and completeness of audit trails in a limited number of cases to demonstrate agreed policy process and procedures were fully embedded.
- Performance framework is underdeveloped and management measures are not in place
- HomeMaster not being fully utilised with data fields not being updated, impacting on the ability to analyse trends and opportunities for learning.
- Limited monitoring against including ensuring proposed remedies were fully implemented and learning opportunities were consistently identified.
- Customers not feeling like they are being listened too and heard

This context has been reflected on carefully considering HOS maladministration findings both of HFW and across the sector, which consistently identify instability, weak handovers, and lack of clear ownership as contributors to complaint handling failures.

The self-assessment and associated complaint action plan 2025/26 reflects these issues

Appendix 2: Learning from Housing Ombudsman Maladministration Findings, Spotlight and Insight Reports

This appendix demonstrates how Housing for Women has reflected learning from HOS determinations, Spotlight and Insight reports, and the Regulator of Social Housing Consumer Standards, and how this learning is applied across each section of the Complaint Handling Code.

Sections 1–2: Definition and Exclusions

Ombudsman learning: Maladministration findings commonly arise where landlords narrowly define complaints, fail to exercise discretion, or apply blanket exclusions. Spotlight reports emphasise early recognition of dissatisfaction and fairness in access.

How Housing for Women applies this learning: Definitions mirror the Code verbatim; discretion is applied where vulnerability, trauma, or safeguarding factors are present; exclusions are considered case by case with clear written explanations and HOS signposting. This aligns with the Tenant Involvement and Empowerment Consumer Standard.

Section 3: Accessibility and Awareness

Ombudsman learning: Spotlight reports on complaints handling highlight barriers caused by digital-only routes, failure to consider equality needs, and poor awareness of the HOS.

How Housing for Women applies this learning: Multiple access routes are maintained; translation, audio and large-print access are signposted; representatives are encouraged; HOS details are included routinely. This reflects Housing for Women's resident profile and Equality Act duties.

Section 4: Complaint Handling Staff

Ombudsman learning: Insight reports show complaints failing where staff lack authority, training, or confidence to resolve issues and where complaints are treated as administrative tasks rather than core services.

How Housing for Women applies this learning: Due to HFW size we have got staff who have a responsibility for managing complaints it is not a completely dedicated complaints function. There is senior access in place; complaint handling is recognised as a core service; training promotes trauma-informed, empathetic responses consistent with Housing for Women's mission.

Section 5: Complaint Handling Process

Ombudsman learning: Maladministration is frequently found where landlords introduce informal stages, delay escalation, or fail to define complaints clearly.

How Housing for Women applies this learning: A strict two-stage process is used; no informal or additional stages exist; complaint definitions and outcomes sought are confirmed early; escalation is not unreasonably refused. This supports transparency and timely access to redress.

Section 6: Complaint Stages and Timescales

Ombudsman learning: The HOS consistently identifies delay, poor communication, and failure to provide updates as drivers of maladministration.

How Housing for Women applies this learning: Timescales are in place and will be monitored under the revised process with extensions agreed and explained; HOS contact details are provided with extensions; responses are issued when decisions are known. Vulnerability and risk are considered when managing timescales.

Section 7: Putting Things Right

Ombudsman learning: Spotlight reports stress the importance of remedies that reflect resident impact, not just process failure, and of acknowledging fault clearly.

How Housing for Women applies this learning: Remedies include apologies, practical action, policy change and compensation; impact on the resident is considered; improvement actions are tracked. Further strengthening of impact-based remedies is identified as a 2025/26 priority.

Section 8: Self-Assessment, Reporting and Compliance

Ombudsman learning: Insight reports emphasise the need for honest self-assessment, publication, and Board ownership rather than compliance-driven reporting.

How Housing for Women applies this learning: Annual self-assessment and complaints reports are published; findings are scrutinised by the governing body; learning from HOS decisions and sector reports is incorporated into service improvement planning.

Section 9: Scrutiny, Oversight and Continuous Learning

Ombudsman learning: The HOS expects evidence of systemic learning, strong governance oversight, and clear accountability through a Member Responsible for Complaints.

How Housing for Women applies this learning: We are reviewing our approach to performance management so complaints data and trends will be reviewed regularly; learning shared with residents and staff; a Board Member Responsible for Complaints provides independent oversight; complaint handling culture aligns with Housing Consumer Standards and Housing for Women's values.

Overall assurance: This mapping demonstrates that Housing for Women does not treat the Complaint Handling Code as a static compliance exercise but as a live framework informed by HOS learning, regulatory expectations, and the specific context of providing safe, equitable housing for women.

Appendix 3



Board Response Statement to the Housing Ombudsman – Jan 2026

The Board of Housing for Women has reviewed and approved the organisation's Annual self-assessment against the HOS Complaint Handling Code for 2025/26.

- The Board acknowledges that during 2024/25 the organisation experienced turnover at senior leadership and management levels which had a temporary impact on aspects of complaint handling, including response times and the consistency of audit trails. The Board notes that Housing for Women received several Complaint Handling Failure Notices from the Housing Ombudsman during this period.
- The Board is satisfied that these issues have been openly acknowledged and that appropriate corrective action is taking place. Replacement senior leadership and management appointments are now in place, providing stability, clear accountability, and improved oversight.
- The Board takes assurance that:
 - The self-assessment is honest, evidence-based, and aligned with the Housing Ombudsman Complaint Handling Code and addresses the 20 recommendations, outlined in the Housing Ombudsman review of the HFW complaints policy of August 2025.
 - Learning from Housing Ombudsman determinations, Spotlight and Insight reports, and Complaint Handling Failure Notices is being reflected into policy, process, and practice
 - Complaint handling arrangements reflect a trauma-informed, equitable, and resident-focused approach
 - Governance oversight, and proposed changes to reporting, and scrutiny arrangements are effective and robust
- The Board supports the 2025/26 Complaints Action Plan and will monitor progress against agreed actions through regular reporting.

Signed on behalf of Housing for Women's Board:	
Name:	
Role:	Chair / Member Responsible for Complaints
Date:	