

WHY WE CHOSE THE SERVICE

The Tenant Scrutiny Group (TSG) has reviewed Community Gateway Association's (CGA) Complaints process and communication around the Housing Ombudsman Service and Ombudsman Code.

The Group made the decision to review the complaints process and communication around the Housing Ombudsman Service and Ombudsman Code as the code has brought about several required changes to the way organisations handle complaints. This area has not previously been reviewed and therefore it is not known whether tenants are aware of their rights when it come to accessing help and advice from the Housing Ombudsman or whether CGA's process complies with the requirements.

CGA tenants are not always aware of how to complain about CGA either directly or via the Housing Ombudsman. The TSG feel that a thorough complaints process is essential to ensure tenants are fairly treated, know how to have their rights met and receive great customer service.

This review has been limited to the complaints process and communication around the Housing Ombudsman Service and Ombudsman Code, due to data protection implications regarding individual complaints circumstances which differ greatly and by their nature contain a lot of data which could easily identify an individual.

Additionally, a scrutiny review is due to start later in 2024 regarding the organisation's response to damp, mould and condensation which will encompass specific responses. This area accounts for the largest number of complaints received by Community Gateway.

SCOPE OF THE REVIEW

The TSG chose the following areas for review:

- Does the complaints process accurately reflect the requirements of the Housing Ombudsman Code?
- Does CGA provide appropriate and helpful information to tenants about complaints and the Housing Ombudsman Service in a way tenants wish to receive it?

- Is CGA's approach to informing tenants about Complaints, the Housing Ombudsman Service and Code in-line with other organisations and best practice?

OUR APPROACH

The TSG used a variety of methods to gather a range of information and evidence in relation to the service. The following activities were undertaken:

- Review of various documentation including the Complaints Policy and procedure, CGA website, leaflets and posters in reception, Gateway News, and reports to Gateway Central and the Senior Management Team.
- A customer survey regarding the complaints process and the Housing Ombudsman Service.
- TSG online research focusing on CGA and other housing association websites.
- Question and answer session with the Governance and Compliance Manager.

FINDINGS AND RECOMMENDATIONS

We found that CGA accurately reflects the needs set out in the Ombudsman Code and is compliant with the requirements.

The information provided by CGA regarding complaints, the Housing Ombudsman and the Code does generally reflect best practice when considering others in the sector.

However, there were several areas for improvement mainly around how information is displayed and ease of access on the website. Of the websites we reviewed, CGA's seemed old fashioned and hard to navigate. This needs to be reviewed if this is to be an asset that provides real value for tenants and the organisation.

DOES THE COMPLAINTS PROCESS ACCURATELY REFLECT THE REQUIREMENTS OF THE HOUSING OMBUDSMAN CODE?

To assess whether the process accurately reflected the code, an analysis of the Complaints Policy and Procedure was carried out against the code, as well as discussion with the Governance and Compliance Manager on how the procedure works on a practical level.

The reports provided to Gateway Central and the Corporate Management Team were reviewed, and the information available via the website was also considered.

STRENGTHS

The Policy and procedure were clear and logical and had a good structure. It was easy to see how a complaint should move through the process and had a focus on customer service.

The procedure covered all the 'required' elements the code as well as all the 'should' elements of the code. However the group did feel that it was unnecessary to include the full policy and procedure online and a recommendation will be made below.

Changes have been made to the reports that go to the Senior Management Team (SMT) to strengthen accountability and transparency, as a tracker is now used to ensure learning outcomes are documented and followed through to implementation.

The information provided to Gateway Central was open and transparent and did not 'sugar-coat' the need for changes to be made and provided enough information for the Committee to scrutinise and query complaints, and this is in line with the requirements of the Code.

AREAS FOR IMPROVEMENT

The TSG are familiar and experienced with reading policies and procedures for CGA as part of their roles on Gateway Central. However, the group are aware that other tenants may not be as familiar, and as such the inclusion of the full policy and procedure could be confusing and longwinded for tenants to read and understand, as it is very process driven. The basics are all that are required to make it clear how CGA deal with complaints and what tenants should expect.

The TSG liked the open and honest level of information provided in the reports that went to the Corporate Management Team, however the tracker did not seem to be updated in all instances, with no updates provided to some actions.

This was disappointing and it was hoped that Senior Management would be prioritising time to ensure that learning actions were progressed in a timely manner.

The survey commissioned by the TSG in relation to the complaints process was completed by a small number of tenants (25) but it highlighted that in the first instance most tenants would raise what they felt was a complaint with the department they had the concern with (55.6%). The TSG feel that this is understandable, and it is hoped that this would provide a quick resolution for tenants, and that this is an acceptable practice that should not be discouraged. However, there is a concern that this could prevent tenants from being provided with the level of information they are entitled to under the Code as these issues are not being dealt with as formal complaints therefore the consistency of the approach by staff will differ in terms of customer service and information provided and recorded.

RECOMMENDATIONS

A summary version of the policy should be produced and an easy-to-follow visual flow chart of the process should be provided on the website so it is clear to customers what CGA's approach is and what they can expect when they raise a complaint.

Tracker reports should be provided monthly rather than quarterly to encourage changes to be implemented more quickly.

Where ELT can see that progress is not being made in line with timeframes provided on implementing learning outcomes in their directorate, they will commit to oversee the action until completion.

A procedure and training should be provided on how to deal with dissatisfaction raised by tenants directly with individual departments, this is to ensure that staff all know what is expected from them when these types of issues are raised, and the information is recorded in a consistent way that can be reviewed as required to spot any trends or emerging concerns.

ADDITIONAL COMMENTS

The TSG found the requirement in the Code to raise a query to a complaint if two enquiries are made by a tenant in relation to the same matter confusing and hard to monitor in practice. This was discussed with the Governance and Compliance Manager who advised that the Housing Management System had been updated to record issues more thoroughly. However it was agreed that this area of the code could easily fall down and was largely dependent on individuals checking back on the system to see if matters had been previously raised.

Additionally, no timescale was set within the Code as to how far back you should go, and this seems unreasonable. The Governance and Compliance Manager confirmed that internally a period of six months had been set, which the TSG felt

was reasonable. The TSG, still felt however, that this would place a lot of responsibility on staff members to review a large amount of data to understand whether an issue should be progressed to a complaint. This issue was something that other housing associations also shared that they were having in terms of ensuring that this part of the Code was complied with. A number of other associations were asked specifically about this matter - their responses indicated that this was largely left to the judgment of colleagues, no one advised that they had any reporting mechanisms in place or firm procedure that was being followed to ensure this.

In relation to this issue the TSG could not come up with any recommendation as to how this could be improved, but felt it was necessary to flag this as a legitimate concern in relation to CGA being able to document that they were fully compliant with the Code and that when an opportunity for consultation with the Housing Ombudsman presented itself that this should be raised as an area of the Code that required review.

DOES CGA PROVIDE APPROPRIATE AND HELPFUL INFORMATION TO TENANTS ABOUT COMPLAINTS AND THE HOUSING OMBUDSMAN SERVICE IN A WAY TENANTS WISH TO RECEIVE IT?

To review this element a survey was commissioned gathering tenants' views and opinions in relation to how they wished to receive information about Complaints and the Housing Ombudsman Service. 25 tenants responded to the survey.

The TSG also reviewed the information Community Gateway and other housing associations provided to tenants via their websites.

STRENGTHS

CGA provided a good balance of information without overwhelming tenants with information, which some other housing associations seemed to do. However, this could still be improved with a summarised version of the policy and procedure as previously recommended.

We also felt it was right that CGA provided some information on a need-to-know basis, which seemed more logical. For example, there were posters up in the reception regarding the Housing Ombudsman Service and the Code was available on the website. However, it was only once you were in the complaints process that additional information was provided around contact details for the Ombudsman.

When looking at how tenants wanted to be communicated with regarding complaints, tenants surveyed indicated that they preferred to receive and send

information digitally via the website and emails (84%), and these options were catered for with a digital form and email address provided on the website.

AREAS FOR IMPROVEMENT

The website is 'clunky' and required lots of searching to find things, for example searching 'Ombudsman's Code' would produce nothing even though you could find the document through other means. You had to go into attachments to review information, and this just felt overly complicated and visually not very appealing. The TSG concluded that the information required is available on the website, but it is difficult to navigate. Other websites, such as Irwell Valley, were much simpler and easier to navigate whilst also providing a range of options for contact that were displayed as visual icons and easy to understand. Links were embedded in text, rather than in separate attachments and this meant that tenants could access as much or as little information as they liked.

It was not clear how to raise a complaint without going into a number of drop-down areas on the website to locate the complaint form. This does not give the impression that complaints are a priority and that feedback is encouraged.

There was no information on the website about the Housing Ombudsman Service that just generally explained what they do and how you can use them and what the ombudsman code was for.

RECOMMENDATIONS

Tenants should be provided with a clear and easily locatable 'button' or dedicated page to raise a complaint that can be accessed immediately from the home page.

The website complaint information should be reviewed to be more tenant friendly and visually appealing, less use of attachments and documents, information should be clearly visible, with additional information possibly embedded as per Irwell Valleys website.

A short knowledge section should be included on the website providing general information about the complaints process, the ombudsman and the ombudsman's code.

IS CGA'S APPROACH TO INFORMING TENANTS ABOUT COMPLAINTS, THE HOUSING OMBUDSMAN SERVICE AND CODE IN-LINE WITH OTHER ORGANISATIONS AND BEST PRACTICE?

CGA were in-line with most other providers in relation to the information provided in relation to the Housing Ombudsman's Code, however the TSG could not locate

the assessment against the Housing Ombudsman's Code on all websites reviewed. It is worth noting that this is a new area for all providers, and it would be worth monitoring how people adapt and change the information they provide as the Code becomes more established. Websites checked to establish best practice:

- Irwell Valley Homes: General Housing Ombudsman information and assessment against the Code provided.
- Progress Housing: General Housing Ombudsman information and assessment against the Code provided.
- Your Housing Group: Assessment against the Code could not be located on website, general information on the Housing Ombudsman was provided.
- Together Housing: Assessment against the Code could not be located on website, general information on the Housing Ombudsman was provided.
- Jigsaw Homes: General Housing Ombudsman information and assessment against the code provided.

STRENGTHS

CGA provided tenants with information about the complaints process and the Housing Ombudsman Code.

AREAS FOR IMPROVEMENT

As previously recommended the website generally is not the most visually appealing or user friendly, with other providers websites appearing much more advanced. Although the information provided was quite similar the way it was provided was visually more appealing and easier to navigate in some other organisations.

For example Progress Housing provided a link to the full report on its main Complaints and Compliments page, so the information was clearly visible to anyone who was looking to make a complaint, whereas CGA's had to be looked for in a 'further information' drop down and then downloaded.

As previously mentioned, there was no general summary information regarding the Housing Ombudsman or the Code.

RECOMMENDATIONS

Continue to monitor other providers' progress to ensure CGA continues to adhere to best practice. The website should be reviewed to be more user friendly and visually appealing; less use of attachments and documents information should be clearly visible and accessible.

Next Steps

The management responses to the recommendations are provided below. A monitoring report will be presented at future meetings to enable the Committee to track the implementation of the Scrutiny Group’s recommendations.

MANAGEMENT RESPONSES

Recommendations	Response	Target for completion
A summary version of the Complaints policy should be produced and an easy-to-follow visual flow chart of the complaints process should be provided on the website.	The complaints policy and procedure are currently being reviewed and easy to follow information regarding the process will be produced and published on the website	Complete
Learning outcome tracker reports should be provided monthly rather than quarterly to encourage changes to be implemented more quickly.	This will be provided on to SMT and ELT on a monthly basis from July 2023.	Complete
Where ELT can see that progress is not being made in-line with timeframes provided on implementing learning outcomes in their directorate, they will commit to oversee the action until completion.	ELT accept this recommendation and will proceed with overseeing those outcomes that are not implemented in a timely manner.	Ongoing: ELT will continue to oversee outcomes and ensure best practice
A procedure and training should be provided on how to deal with dissatisfaction raised by tenants directly with individual departments to ensure that staff all know what is expected from them and to make sure the information is recorded in a consistent way.	Training regarding the Housing Ombudsman’s Complaints Handling Code and dissatisfaction will be provided to teams and colleagues in the organisation to ensure that dissatisfaction and complaints are dealt with in a fair, clear and consistent manner.	Complete

**TENANT SCRUTINY REVIEW
COMPLAINTS PROCESS AND COMMUNICATION
REGARDING THE HOUSING
OMBUDSMAN AND OMBUDSMAN CODE**

<p>Tenants should be provided with a clear and easily locatable 'button' or dedicated page to raise a complaint that can be accessed immediately from the home page.</p>	<p>We will add a complaints section to the home page of the website, along with reporting functionality.</p>	<p>Complete (new website launched June 2024)</p>
<p>The website complaint information should be reviewed to be more tenant friendly and visually appealing, less use of attachments and documents, information should be clearly visible, with additional information possibly embedded.</p>	<p>We will be undertaking a full review of the website this year to ensure all the content is customer friendly and accessible. We shall be working with tenants to do this so we can ensure it meets their needs, with the first meeting scheduled in July.</p>	<p>Complete (new website launched June 2024)</p>
<p>A short knowledge section should be included on the website providing general information about the complaints process, the ombudsman and the ombudsman's code.</p>	<p>Once the policy and process have been reviewed, the website will be updated with information relating to the complaints process, the Housing Ombudsman and the complaints handling code.</p>	<p>Complete</p>
<p>Continue to monitor other providers' progress in relation to the code to ensure CGA continues to adhere to best practice.</p>	<p>This will be ongoing. This is to be a recurring agenda item on one to ones to ensure that focus is not lost.</p>	<p>Ongoing: CGA will continue to monitor progress to ensure best practice.</p>

The TSG wishes to express its thanks to all those who have supported and assisted with the scrutiny review.