

Complaints Review Resident Scrutiny Group

MAY 2023

Resident Scrutiny Group: Complaints Review, May 2023

Introduction

The Housing Ombudsman defines a complaint as "Any expression of dissatisfaction, however made, about the standard of service, action or lack of action by the organisation, its' own employees, or those acting on its' behalf, affecting an individual resident or a group of residents."

Abri is committed to providing high quality services to their customers and making sure the customer is at the heart of everything they do. In some cases, Abri may not always meet their customers' expectations or requirements and so needs to ensure that there is an accessible, easy to follow and robust complaint policy in place to resolve matters as effectively as possible.

Abri's aim is to resolve issues and put things right at the first attempt, however it is recognised that in some cases, they will need to investigate the situation further.

Complaints and all other types of customer feedback are extremely important to Abri. They help Abri to understand their performance and to focus on new ways of improving the services they deliver. Abri aims to treat each complaint as an opportunity for learning and as such, they will also ensure that any learning outcomes are captured and where appropriate, implemented.

Recognising that the complaints policy and procedure have recently been reviewed, tested and revised by Abri following the changes to the Housing Ombudsman Complaint Handling Code, the project group agreed to focus their review on the customer experience of the complaint handling process.

Approach

Members of the project group met with the Head of Customer Feedback & Service Improvement to better understand the current position of complaints performance at Abri. They also used the opportunity to ask questions about the complaints handling process and compare this with direct experience from customers who have recently raised a complaint.

As desktop research, members reviewed several key documents, including the Complaints Policy, Customer Relations Procedure, Housing Ombudsman's Complaint Handling Code, data comparison information from Housemark, performance data from the past 18 months, root cause analysis actions plans, the recent internal audit of complaints and various examples of communication with customers as part of the complaint process. Such examples included update and resolution letters at both Stage 1 and Stage 2.

The group also met with a Complaint Officer and a Senior Complaint Officer to understand how their roles, responsibilities and daily tasks contribute to the complaints handling process. The project group was made up of members of the RSG who have all recently been through the complaints process, and some of their experiences are referred to within this report.

Findings and Recommendations

Communicating and record keeping

- 1. Communicating with customers with their preferred method is very important. Several examples shared by customers advised that they had not been contacted via their preferred method in relation to their complaint despite making this clear. The group noted that the Investigation Report completed by an Abri colleague when a customer raises a complaint includes a section asking for their 'preferred contact'. The group would like to see this made clearer and recommend using the wording 'preferred method of communication'. This should be captured initially and recorded clearly within the complaint notes on both the Investigation Report and Open Housing. It was recognised that there is an ongoing project to introduce a field within Open Housing to record a customers' preferred method of contact following the RSG's review of Communications in 2021-22. Once this project is complete, complaint officers should still ask a customer to confirm this when in relation to a complaint.
- 2. A significant contributing factor to the handling of a complaint successfully, is the quality of the information gathered and recorded, including 'notes' that are saved on the complaint file. The group investigated the quality of notes linked to several complaints and found that these were not satisfactory or sufficiently detailed to support effective handling of the complaint and providing suitable outcomes. The group also noted the findings contained within the recent internal audit of complaints, of which poor quality note taking was reported. The lack of quality notes for some complaints means it is hard to evidence that the complaint has been effectively investigated and this poses a significant risk to Abri should a complaint be escalated to Stage 2, or the Housing Ombudsman.
- 3. The group acknowledged that Stage 2 complaints are often reviewed by senior colleagues within the business or the customer complaints panel. Therefore, it is vitally important that the notes recorded against any complaint are clear, accurate and easy to understand. Ensuring that there is a good quality audit trail of a complaint at Stage 1, will enable the officer or complaints panel investigating the complaint at Stage 2 to have access to all the relevant information without the need to start the process again. This will also support them to make a well informed decision regarding the outcome of their investigation.
- 4. Good quality note taking should not only be expected of Abri colleagues, but also third parties who act on Abri's behalf, such as the Out of Hours (OOH) service. Poor note taking by the OOH service can have a considerable impact on the service subsequently delivered by Abri. The group learned of one specific incident that led to a faulty isolation valve taking two days to replace rather than 24 hours it could have taken due to inaccurate notes recorded by the OOH service. The RSG recommends that Abri provide the OOH operator with a guide of expectations in relation to note taking OOH reports. If such guidance already exists, the OOH operator should be reminded of these expectations.
- 5. The group noted that information on note taking is contained within the training delivered to new colleagues but recommend that a specific unit on what good quality note taking looks like is added. Training should be delivered to all customer facing teams with regular refresher training incorporated into colleague training plans.

| Action Ref | Recommended Action | Officer Responsible | Deadline |
|-------------|--|--|----------------------|
| COMP0523.01 | When raising a complaint, ensure that the customer's preferred method of contact is confirmed with them Clearly record this on the relevant systems and investigation report Complaint officers to check with customer their preferred method of contact throughout tenure of open complaint | Head of Customer Contact and Head of Customer Feedback & Service Improvement | 31 August 2023 |
| COMP0523.02 | Ensure accurate and well written notes are taken for all complaint records. This recommendation will be monitored through the Internal Audit actions: CO922.06 and CO922.07 | Head of Customer Feedback & Service Improvement | • |
| COMP0523.03 | Share a guide with the OOH service provider that clearly states Abri's expectations around note taking for each call. If such guidance already exists, the OOH service provider should be reminded of these expectations. | Head of Customer Contact | 30 September 2023 |
| COMP0523.04 | Add a specific section covering good record keeping to the training that is delivered to new complaints colleagues and also include in any refresher training | Head of PD | 31 December 2023 |
| COMP0523.05 | Complaint Quality Officers to undertake spot checks of complaint notes. Highlight areas of good practice and address persistent inadequate note taking proactively with suitable one-on-one coaching. | Head of Customer Feedback & Service Improvement | 30 September 2023 |

Performance and Service Level Agreements

6. Complaints performance is closely monitored by Abri via several measures and KPI's, all of which are shared with the Resident Scrutiny Group on a quarterly basis. Some of the measures reviewed by the RSG are listed below; the figures contained within are the end of year for 2022-2023.

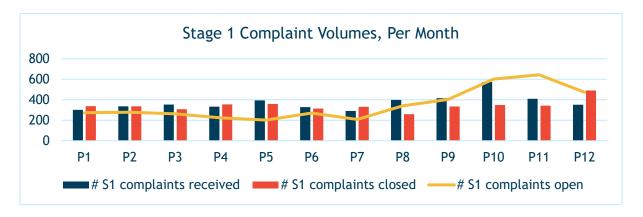
| Stage 1 complaints | P1 Apr | P2 May | P3 Jun | P4 Jul | P5 Aug | P6 Sep | P7 Oct | P8 Nov | P9 Dec | P10 Jan | P11 Feb | P12 Mar |
|--|------------|------------|-----------|------------|------------|------------|------------|------------|------------|------------|------------|------------|
| % service enquires resolved | 73. 83% | 75. 19% | 67% | 66. 64% | 75. 93% | 83. 12% | 81. 15% | 66. 08% | 66. 91% | 59. 97% | 70. 58% | 75. 24% |
| Ratio of formal complaints (Stage 1 only) to Abri homes (per 1000 homes) | 9 | 10 | 11 | 10 | 12 | 9 | 8 | 11 | 12 | 16 | 11 | 10 |
| Complaint volumes - Sector Benchmark (HouseMark data per 1000 homes) | 2.12 | 2.76 | 3.16 | 2.94 | 2.89 | 3.8 | 3.62 | 4 | 5 | 6 | 4 | 5 |

| Ave age of open formal complaints (Stage 1) (Working Days) | 37 | 37 | 25 | 24* | 17 | 20 | 18 | 14 | 9 | 12 | 18 | 26 |
|---|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|---------|
| % open in timescales (Stage 1) | 58% | 63% | 72% | 79% | 67% | 83% | 72% | 84% | 99% | 85% | 65% | 48% |
| Average working days taken to close formal complaints (Stage 1) | 18 | 19 | 17 | 16* | 17 | 16 | 16 | 19 | 23 | 18 | 24 | 25 |
| % resolved in timescales (Stage 1) | 64% | 55% | 67% | 72% | 76% | 69% | 69% | 78% | 70% | 67% | 41% | 44% |
| Resolution in timescales - Sector Benchmark (Housemark data) | 90. 11% | 91. 10% | 88. 60% | 91. 70% | 91. 80% | 90. 80% | 89. 00% | 90. 10% | 89. 80% | 85. 00% | 84. 00% | TB C |

| Stage 2 complaints | P1 Apr | P2 May | P3 Jun | P4 Jul | P5 Aug | P6 Sep | P7 Oct | P8 Nov | P9 Dec | P10 Jan | P11 Feb | P12 Mar |
|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|------------|------------|
| Ratio of formal complaints (Stage 2 only) to Abri homes (per 1000 homes) | 1 | 1 | 1 | 2 | 2 | 1 | 1 | 2 | 1 | 2 | 1 | 3 |
| Ave age of open formal complaints (Stage 2) (Working Days) | 28 | 34 | 36 | 28 | 27 | 38 | 35 | 32 | 24 | 23 | 30 | 30 |
| % open in timescales (Stage 2) | 55% | 45% | 49% | 63% | 66% | 38% | 48% | 69% | 80% | 80% | 58% | 58% |
| Average working days taken to close formal complaints (Stage 2) | 41 | 39 | 39 | 47 | 35 | 40 | 50 | 42 | 37 | 35 | 44 | 49 |
| % resolved in timescales (Stage 2) | 20% | 23% | 5% | 26% | 47% | 30% | 18% | 56% | 50% | 55% | 22% | 32% |

- 7. The RSG takes a keen interest in how Abri is performing against its peers within the sector. Since July 2020 when the Housing Ombudsman first launched its new Complaints Handling Code, Abri adopted a very literal approach to the definitions which saw complaints volumes significantly increase. Other providers did not take such approach and the gap between Abri and the majority of the sector in terms of complaints volumes widened.
- 8. In April 2022, the Housing Ombudsman updated the Code to "strengthen provisions to support a positive complaints handling culture" ^{1.} Since then, providers must now take a more literal approach to recording complaints to ensure they remain compliant with the code, which is seeing an upward trend in volume. However, Abri remains relatively consistent and has not seen this further increase in volumes, except for several periods of high demand, as shown in the graph below.

¹ Extracted from the updated Code



- 9. The group queried these areas of high demand and was advised that this can be attributed to an increase in gas-related complaints resulting from the winter servicing and adverse weather repairs backlog. To prevent such instances occurring again next year, the group was advised that Abri has undertaken seasonal complaint analysis which will seek to address the risk associated with adverse weather and its subsequent impact.
- 10. The Customer Relations Team who are responsible for managing complaints, sometimes require more information from the wider business as part of the complaint investigation. It is imperative that this information is provided to the complaints officer as soon as practically possible to support achieving turnaround times outlined in Abri's service level agreements (SLA's). Abri commits to responding to Stage 1 complaints within 10 working days, and Stage 2 complaints within 20 working days, where possible. In terms of information requests from the wider business, the RSG understands that an internal agreement of two days for submission of requested information is in place. However, this is not always happening.
- 11. It is important that the wider business understands the effects of not providing information promptly within the complaints handling process. As shown below, Abri has not met target (100%) for handling complaints within 10 working days throughout the whole of 2022-23.

| % resolved in timescales (Stage 1) | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar |
|------------------------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| % resolved in timescales (Stage 1) | 64% | 55% | 67% | 72% | 76% | 69% | 69% | 78% | 70% | 67% | 41% | 44% |

- 12. Following the significant increase in volume of complaints, a recovery plan was put in place including the introduction of Senior Complaint officers. The changes to the resourcing model have been made to provide stability and manage wellbeing and caseload of complaint officers.
- 13. The group acknowledge that sometimes, SLA's just cannot be met, but the most important factor is that customers are kept up to date with progress. Lack of communication is a common theme that arises in many of RSG's conversations with customers and in instances of complaints, is common.
- 14. To strengthen relationships between Abri and the customer, the RSG recommend that where an extension to respond to the complainant exceeds that contained within the SLA, the customer is notified no later than one working day prior to the original deadline.

15. It is further recommended that the RSG continue to monitor complaints performance on a quarterly basis throughout 2023-24 and an escalation process is put in place should the group become concerned that progress against the recovery plan is not effective.

| Action Ref | Recommended Action | Officer Responsible | Deadline |
|-------------|--|---|-------------------|
| COMP0523.06 | When an extension is required for a complaint resolution, ensure the customer is contacted by no later than one working day prior to the original deadline to advise of the extension. | Head of Customer Feedback & Service Improvement | 30 September 2023 |
| COMP0523.07 | Agree an escalation process for the RSG to raise concerns about the progress of complaint performance recovery. | Chair of RSG in conjunction with Company Secretary | 31 December 2023 |

Correspondence

- 16. The group reviewed anonymised examples of Stage 1 and Stage 2 acknowledgement and resolution letters. Whilst overall, the group support the approach and content of the letters, they are keen for Abri to make a few small changes that will further improve the customers experience.
- 17. It is suggested that Abri do not name individual colleagues in any response communication. Instead, it is recommended that Abri use job titles or team names where necessary. Naming an individual can in some instances further delay a resolution or lead to unnecessary contact between the customer and that individual.
- 18. Members also recommend that when advising customers of timescales, such as 'please ensure you respond to us within 15 working days if you would like your complaint to be escalated' that Abri also include the day and date that this will fall on. This will avoid any confusion over the interpretation of what working days are and give a clear and defined deadline.

| Action Ref | Recommended Action | Officer Responsible | Deadline |
|-------------|---|---|-------------------|
| COMP0523.08 | Change approach to response communication (letter, email or phone/message) to ensure that individual colleague names are not used. Instead, use job titles or team names. | Head of Customer Feedback & Service Improvement | 30 September 2023 |
| COMP0523.09 | Add the day and date of any 'working day' timelines/deadlines. | Head of Customer Feedback & Service Improvement | 30 September 2023 |

Root Cause Analysis

- 19. To enable Abri to learn from complaints, a Root Cause Analysis (RCA) process has been introduced. When a case is closed, the Complaints Officer inputs the relevant information onto the system. This is then extracted from the system by Root Cause Analysts so that they can check on the Complaints received for the month.
- 20. The Root Cause Analysts use this information to create and share an action plan to address key issues. It was found that in some instances this has been harder to progress with some actions remaining incomplete for considerable lengths of time.
- 21. Initially, the group recommended that the Master RCA action plan is shared with the RSG on a quarterly basis, as part of the regular complaints updates. The intention would be to monitor progress of the action plans and use this as an opportunity to feedback ideas and suggestions for further improvement. However, as of 30 May 2023, a new Customer Feedback process has been approved and will include sharing information such as RCA outcomes with the regional customer panels. Therefore, the RSG instead recommend that the Head of Customer Feedback & Service Improvement attends a future RSG meeting to provide an overview of the new customer feedback process.

| Action Ref | Recommended Action | Officer Responsible | Deadline |
|-------------|--|---|-------------------|
| COMP0523.10 | Attend a future RSG meeting to provide an overview of the new Customer Feedback process. | Head of Customer Feedback & Service Improvement | 30 September 2023 |

Aftercare service

- 22. All customers who the group spoke with, agreed that there is potential for improvement of Abri's aftercare service following the closure of a complaint. Whilst members initially recommended that Abri contacts all customers within three months of closing the complaint to check in and ensure customers remain satisfied, it was agreed that this would not prove effective use of colleague time and would significantly increase workload.
- 23. However, members recognise the importance of checking in with customers who have raised a complaint and the value that this can add to relationship recovery. Therefore, the group recommend that Abri consider, explore and co-design with the support of customers, a post complaint after care service. It is important to note that members understand this will take time and a solution in direct terms may not be achievable once explored.

| Action Ref | Recommended Action | Officer Responsible | Deadline |
|-------------|--|---|---------------|
| COMP0523.11 | Consider and co-design with the support of customers, a post complaint after care service. | Head of Customer Feedback & Service Improvement | 31 March 2024 |

Conclusion

It was found that overall, Abri's approach to Customer Complaints was good, but this was not always evident in the form of performance and customer satisfaction. Every colleague within Abri is responsible for complaints in some way and this should be highlighted at every opportunity. Colleagues should be empowered to take ownership of issues raised in complaints and support the Customer Relations team to be proactive in terms of response.

The RSG believe that by improving the quality of notes recorded for all customer interactions, complaints will be resolved quicker and more effectively. Training for effective note taking should be a priority for the organisation and all colleagues should be reminded of the need to respond to requests from the Customer Relations team within two days. Open and transparent communication with customers should be at the forefront of Abri's approach to complaint resolution and the RSG look forward to working with the team to implement the recommendations.