



## **1. Introduction**

- 1.1. STAR Housing is committed to providing excellent services for customers. Hearing from dissatisfied customers and learning from complaints forms a large part of our improvement journey. STAR operates a two stage complaints process after which, if the customer remains dissatisfied, the customer has the right to escalate the complaint to stage 3 for a Housing Ombudsman investigation. Residents also have a right to contact the Housing Ombudsman for advice before making a complaint to the Council or at any stage during STAR's consideration of their complaint.
- 1.2. Achieving an accessible, positive and effective complaint handling culture includes learning from complaints and making improvements to services as a result. This document presents STAR's annual complaints performance and service improvement report for 2024 in accordance with the requirements set out in the Housing Ombudsman's Complaint Handling Code (February 2024) as noted below.
- 1.3. Section 8 of the Housing Ombudsman's Complaints Handling Code requires that Landlords must produce an Annual Complaints Performance and Service Improvement Report for scrutiny and challenge which must include:
  - a) the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.
  - b) a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;
  - c) any findings of non-compliance with this Code by the Ombudsman;
  - d) the service improvements made as a result of the learning from complaints;
  - e) any annual report about the landlord's performance from the Ombudsman; and
  - f) any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.
- 1.4. This report aims to fulfil all of the above requirements and will be put forward for review, endorsement and approval to the following committees and meetings:
  - STAR Housing – Customer Services Committee 06/06/2024
  - Shropshire Council – Asset Assurance Board 12/06/2024
  - Meeting of the Member(s) Responsible for Complaints 19/06/2024
  - STAR Housing – Board 24/06/2024

## **2. Annual Self-Assessment**

- 2.1. A first draft of the Self-Assessment is attached at Appendix A to this report. The Self Assessment has been completed with the support of Shropshire Council officer Jenny Daisley. A Summary of the Self-assessment is shown below:

### **Section 1- Definition of a complaint**



- 2.2. 5 out of 6 of the elements are met with 1 not being met. Note details and actions to achieve full compliance below and in the Service Improvement Plan.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	No	1.6.1 – Complaints – Page 5 – Section 5.5	We have implemented this into our complaints policy clearly outlining this.  We are currently updating the surveys we use across the business to ensure we provide details on how tenants can complain. This will be completed by 31 August 2024

**Section 2 – Exclusions**

- 2.3. All five elements are met

**Section 3 – Accessibility and Awareness**

- 2.4. 6 out of 7 elements are met with 1 partially met. Note details and actions to achieve full compliance below and in the Service Improvement Plan:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Partially	3.5.1 - <a href="https://www.starhousing.org.uk/have-your-say/make-a-complaint/">https://www.starhousing.org.uk/have-your-say/make-a-complaint/</a> 3.5.2 – Posters/Leaflets	Posters will be available in all communal areas signposting how to make a complaint by end August 2024

**Section 4 – Complaint Handling Staff**

- 2.5. 2 out of 3 elements are met with 1 not being met. Note details and actions to achieve full compliance below and in the Service Improvement Plan:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	No	N/A	We are in the process of rolling out complaints training to all our operational teams to ensure all staff have a clear understanding of the complaints process and how we implement lessons learnt – We aim to have this completed by 30/09/2024

**Section 5 – The Complaint Handling Process**



2.6. 12 out of 15 elements are met with 2 partially being met and 1 not being met. Note details and actions to achieve full compliance below and in the Service Improvement Plan:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	No	N/A	We are unable to evidence that this is recorded – we will implement this immediately.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Partially	5.12.1 – Complaints file for complaints 5.12.2 – Complaint action tracker	We currently have a complaints file for each complaint which encompasses the original complaint and all acknowledgments, outcomes and the investigation report.  All follow on actions are logged and monitored.  We are currently rolling out training to ensure that all correspondence and reports are saved to one file. This will be completed by 30/09/2024
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Partially	5.14.1 – Unreasonable Persistent Complainants Policy	We have a policy in place for unacceptable behaviour and we will be implementing a tracker to ensure we record all restrictions and are able to monitor this.

**Section 6 – Complaints Stages**

2.7. Stage 1: 6 out of 9 elements are met with 2 partially being met and 1 not being met. Note details and actions to achieve full compliance below and in the Service Improvement Plan:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.3	Landlords must issue a full response to stage 1 complaints <b>within 10 working days</b> of the complaint being acknowledged.	Partially	6.3.1 – Complaints Tracker 6.3.2 – Formal Response (see evidence 6.1.2)	We aim to respond to all complaints within 10 working days and where this is not possible communicate and agree extensions with tenants.  We are currently in the process of training all staff to understand this process we aim to have



				this completed by 30/09/2024
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Partially	6.4.1 – Complaints Tracker	All extensions are recorded on our complaints tracker and we aim for no longer than 10 working days.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	No	N/A	We are unable to evidence that this is recorded – we will implement this immediately.

2.8. Stage 2: 9 out of 11 elements are met with 2 partially being met. Note details and actions to achieve full compliance below and in the Service Improvement Plan:

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Partially	6.12.1 – Stage 2 response example (see evidence 6.10.1)	We provide a clear process to escalating a complaint, however we do ask that reasons are given in order to escalate this will be recorded immediately.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Partially	6.15.1 – Complaints Tracker	All extensions are recorded on our complaints tracker and we aim for no longer than 20 working days.  We are unable to evidence that this is recorded – we will implement this immediately.

**Section 7 – Putting things right**

2.9. 4 out of 4 elements are met.

**Section 8 – Self-assessment, reporting and compliance**

2.10. 5 out of 5 elements are met.



**Section 9 – Scrutiny & oversight: continuous learning and improvement**

2.11. 8 out of 10 elements are met with 1 partially being met and 1 not met.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Partially	9.2.1 – Complaints Policy	We have a complaints policy in place which provides guidance on complaint handling and a centralised complaints team who manages complaints effectively.  We are currently in the process of training all staff to understand this process we aim to have this completed by 30/09/2024
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	No		Whilst we have meetings to discuss this internally there is no formal reporting through to committees. This will be established before the end of September 2024

**Summary**

2.12. The table below shows the status of the self-assessment as at June 2024

Elements	Status
Met	82.8%
Partially Met	9.4%
Not Met	7.8%
<b>Total</b>	<b>100.0%</b>

2.13. The notes to the self-assessment and the Service Improvement Plan show how the partially and not met elements will be resolved. In the main these elements relate to:

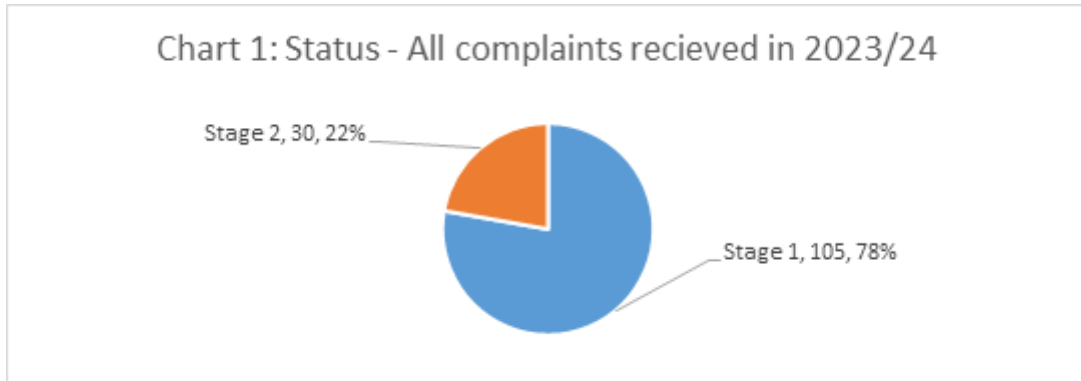
- Better signposting to customers
- Improved awareness of the system throughout the business
- Better communications with complainants where timescales are likely to be protracted
- Improved record keeping and reporting of lessons learned.

2.14. We are confident that these improvements can be actioned by the end of September 2024.

**3. Annual Complaints Performance – 2023-24**



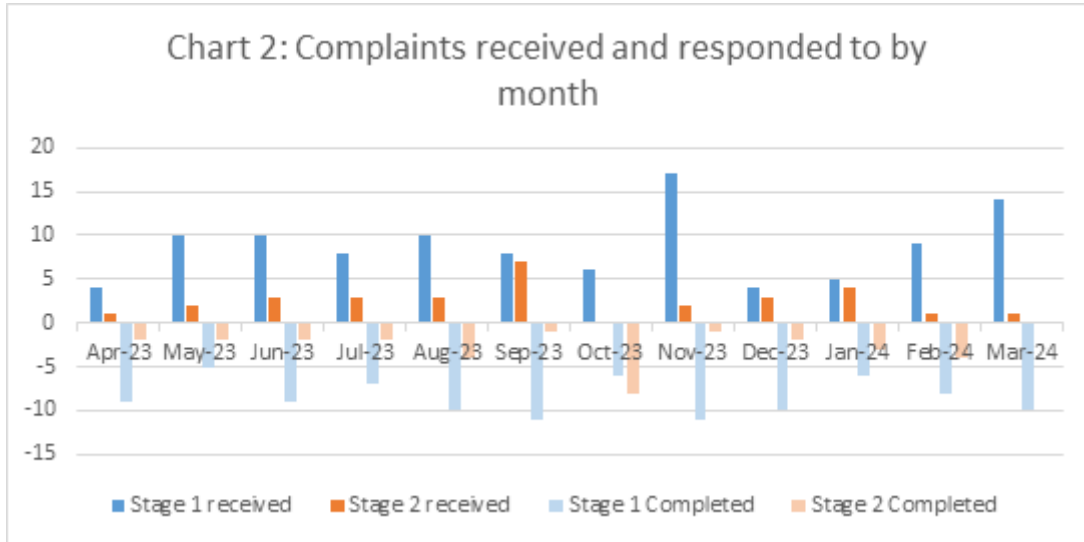
3.1. During 2023/24 a total of 135 complaints were received (see chart 1). Only 1 complaint was not acknowledged within timescale.



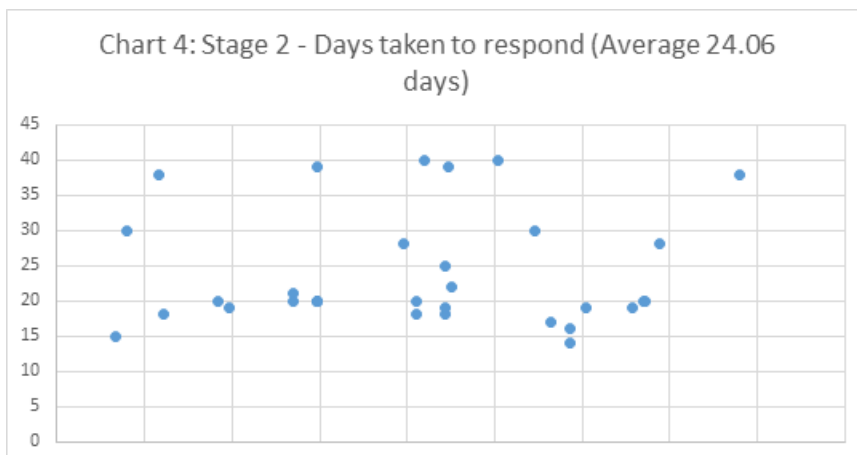
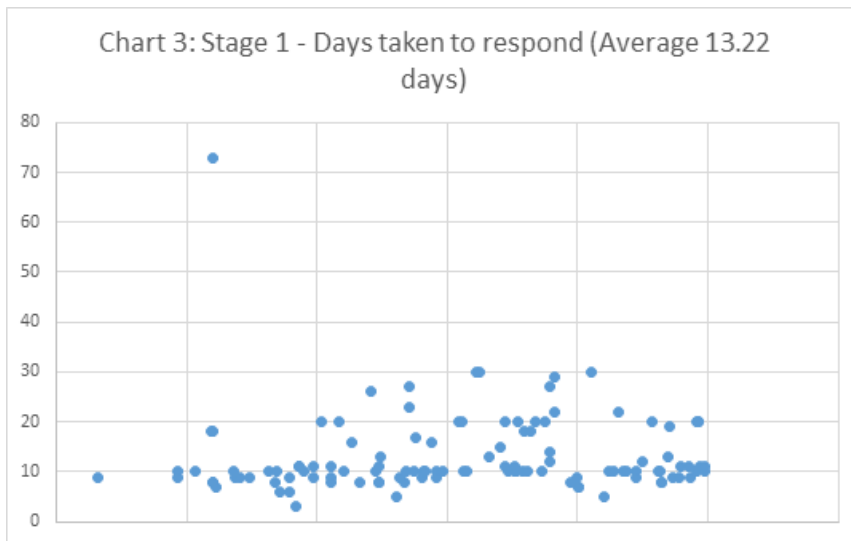
3.2. A total of 133 complaints were responded to in the year and 107 (**80.45%**) of these were responded to within code timescales. This compares to an annual KPI target of at least 90% to be responded to within code timescales so the result fell short of target.

2023-24	No of Complaints Responded to in the year	No of Complaints responded to within code timescales	%age of Complaints responded to within code timescales
Stage 1	102	82	80.39%
Stage 2	31	25	80.65%
<b>Total</b>	<b>133</b>	<b>107</b>	<b>80.45%</b>

3.3. On average 8.75 Stage 1 complaints are received each month and 2.5 Stage 2 complaints (See Chart 2)

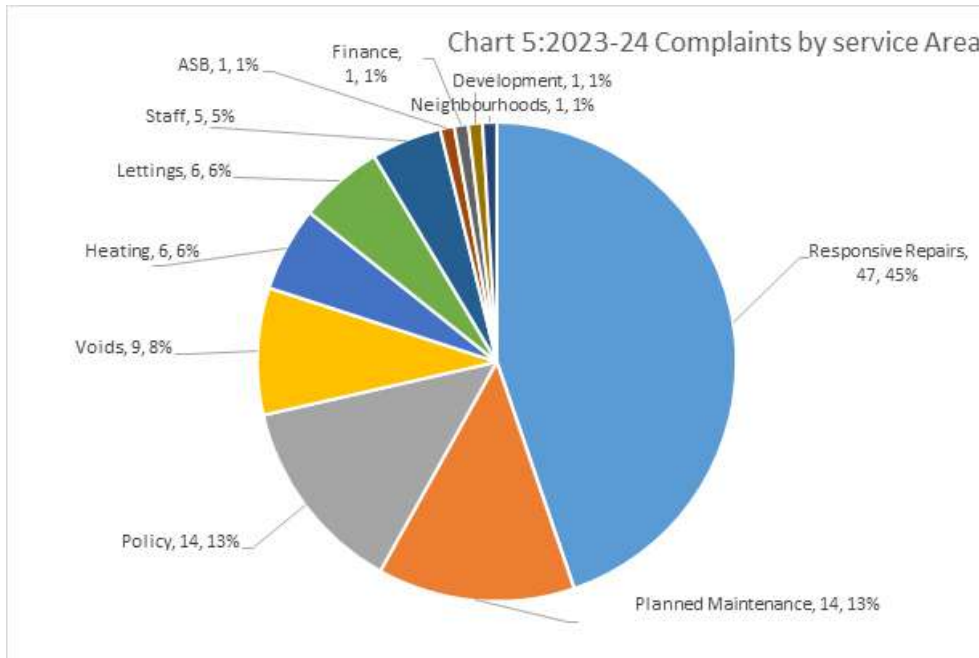


3.4. On average Stage 1 complaints were responded to within 13.22 days (against a target of 10 days) and Stage 2 complaints within 24.06 days (against a target of 20 days). (See Charts 3 and 4)

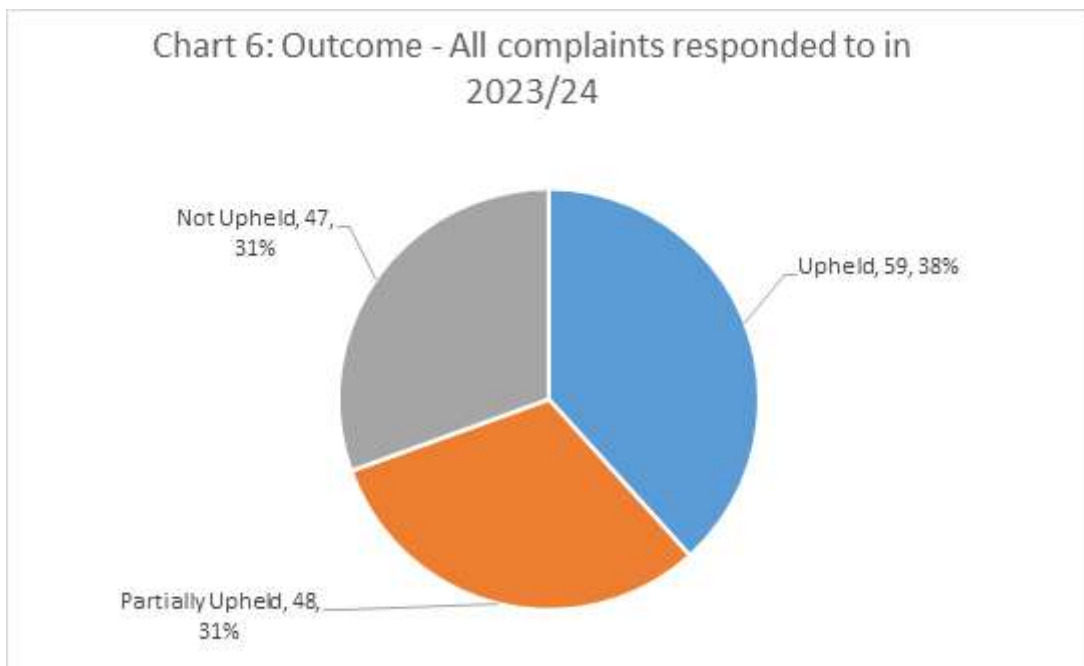




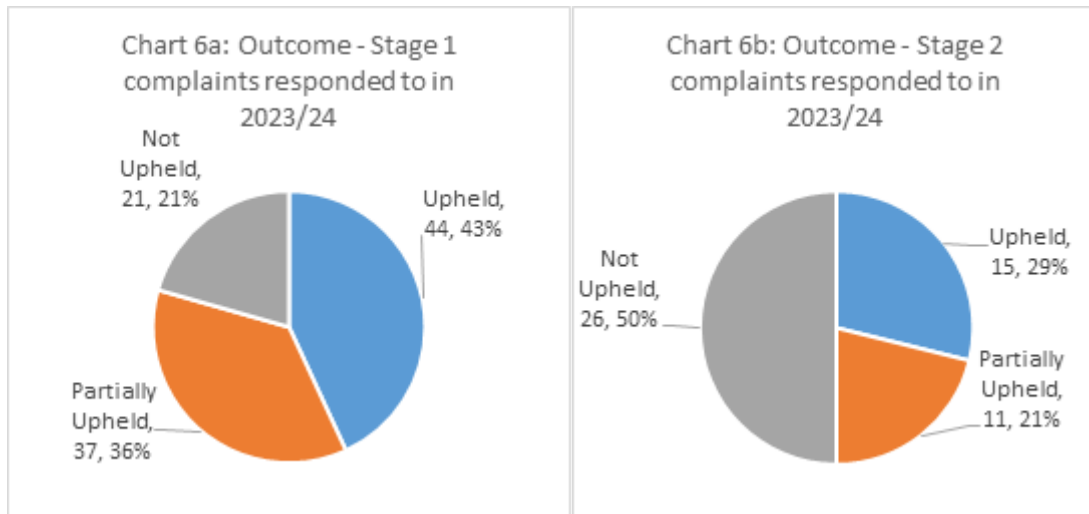
3.5. Responsive Repairs continues to be the service area receiving the highest number of complaints. This is reflective of the volume of work in this area (Chart 5).



3.6. Of the complaints responded to during the year the decisions were evenly split between the three categories (See Chart 6).







**Housing Ombudsman**

3.7. There was one Housing Ombudsman complaint which was determined during the year having been raised during 2022/23). The Housing Ombudsman found that there were three counts of service failure in relation to the complaint. As follows:

- In accordance with paragraph 52 of the Scheme, there was service failure by the landlord in respect of the information provided about the property before the resident accepted the tenancy.
- In accordance with paragraph 52 of the Scheme, there was service failure by the landlord in its response to the resident’s request to alter the property.
- In accordance with paragraph 52 of the Scheme, there was service failure by the landlord in respect of its handling of the resident’s complaint

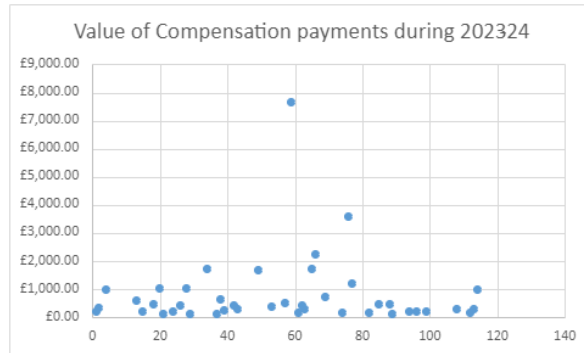
3.8. STAR was ordered to pay the landlord a total of £200 in compensation for the service failures.

3.9. Learning as a result of the complaint was taken on board including all properties with the same layout now having been defined as 3 bedroom properties on the housing management system so the issue should not arise again.

3.10. The Ombudsman did not produce any further reports regarding Shropshire HRA stock in the year.

**Compensation**

3.11. A total of £33,019 in compensation was paid out during the year across 41 cases at an average of £805 per complaint compensated. Payments ranged from £100 to £7650 for a complaint where personal property had been damaged as a result of damp and mould.



**4. Tenant Satisfaction Measures – Outcomes 2023/24**

- 4.1. During October 2023 Acuity carried out a Tenant Satisfaction Measures Survey on behalf of STAR housing. 530 interviews were complete. 523 by phone and 7 online. Quotas were applied based on tenure, location, age and ethnicity to ensure the sample chosen represents the resident population as a whole. 490 general needs residents responded and 40 sheltered residents.
- 4.2. Customer satisfaction levels overall were reported at 82% with over eight out of ten residents satisfied with the overall services from STAR. However, within the results complaints stands out as a weak area with only 34% of residents satisfied with the complaints handling service.



4.3. There were 17% of residents who said they had made a complaint to STAR in the last 12 months, although it is not clear how many were genuine complaints with many likely to be service requests that have yet to be fully actioned, such as outstanding repairs. The survey highlighted that customers need to know what to do if faced with a failure of service and need to have confidence that their concerns will be heard and acted upon and improved signposting has been incorporated into the Service Improvement Plan.

**5. Complaints Service Improvement Plan**



5.1. The Complaints Service Improvement Plan is attached at Appendix B. The improvements have been informed by both the learning from the annual self-assessment exercise and the TSM survey as well as learning as a result of handling complaints during the year. Delivery of the improvement plan will be monitored by the Senior Management Team throughout 2024/25.

## **6. The Governing Body's Response**

- 6.1. As well as a senior officer lead in the business (Director of Corporate Services) a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC')
- 6.2. Two MRCs have been appointed one from the perspective of STAR Housing as ALMO, Vince Hunt and one from Shropshire Council as Landlord, Dean Carroll. Both have been briefed on expectations and have received a copy of relevant reports.
- 6.3. Complaints are discussed with MRCs in 1:1 meetings following customer services committee, at STAR board meetings and at Asset Assurance Board ensuring the MRC's receive regular information. When publishing the self-assessment as part of the annual complaint performance and service improvement report, landlords must include the governing bodies response to the report.
- 6.4. The purpose of publishing the governing body's response to the self-assessment is to provide assurance that the self-assessment is a true reflection of the landlord's complaint handling. The response should set out how the MRC has scrutinised and challenged the self-assessment and how any risks identified as part of the review have been addressed. Landlords should also include any lessons learned through the self-assessment process and actions taken as a result. The response can also highlight areas of achievement and any challenges that the landlord has faced during the reporting year. When doing so, landlords are encouraged to take an open and transparent approach to demonstrate accountability to their residents and other stakeholders.
- 6.5. The response will be appended to this report once it has been produced.

Appendix A – Self Assessment - June 2024 – V1.0

Appendix B – Complaints Service Improvement Action Plan – June 2024 – V1.0

Appendix C – Governing Body's Response (To be completed)