

# Scrutiny Streets, Environment & Homes Sub- Committee Supplementary Agenda



5. **Investigation into conditions at 1-87 Regina Road, South Norwood and the Housing Service Improvement Plan (Pages 3 - 32)**

To receive the Cabinet report of the investigation into conditions at 1-87 Regina Road and the Housing Service Improvement Plan.

## BACKGROUND DOCUMENT

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## Croydon Housing Scrutiny Panel



### Scrutiny of Housing Complaints Procedure.

July 2019

Croydon Housing Scrutiny Panel: *Yaw Boateng, Rosie Burke, Sheryl Read, Guy Pile-Grey, Petrena Johnson, Desmond Ojumu*

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## OVERALL CONCLUSION

The panel concluded based on their findings that the council's complaints procedure is comprehensive, but that problems arise during execution particularly where the service in question is involved. More needs to be done to convey the importance of complaints to service development and improvement across the council. The existence of a complaints procedure needs to be more widely publicised to residents, along with clear instructions, criteria and guidelines to help to avoid excessive or unnecessary complaints. The policy needs to be updated to reflect recent changes in complaints handling and to include the designated person stage in the text and diagrams.

Key officers responsible for handling complaints appeared to be very passionate about their job and recognised the importance of complaints resolution and handling. They play an important role in conveying this to other service areas, rolling out complaints handling training to various teams across the council. The independent investigation carried out by the complaints handling team at stage 2 of the process was viewed positively by the panel.

## 1. INTRODUCTION

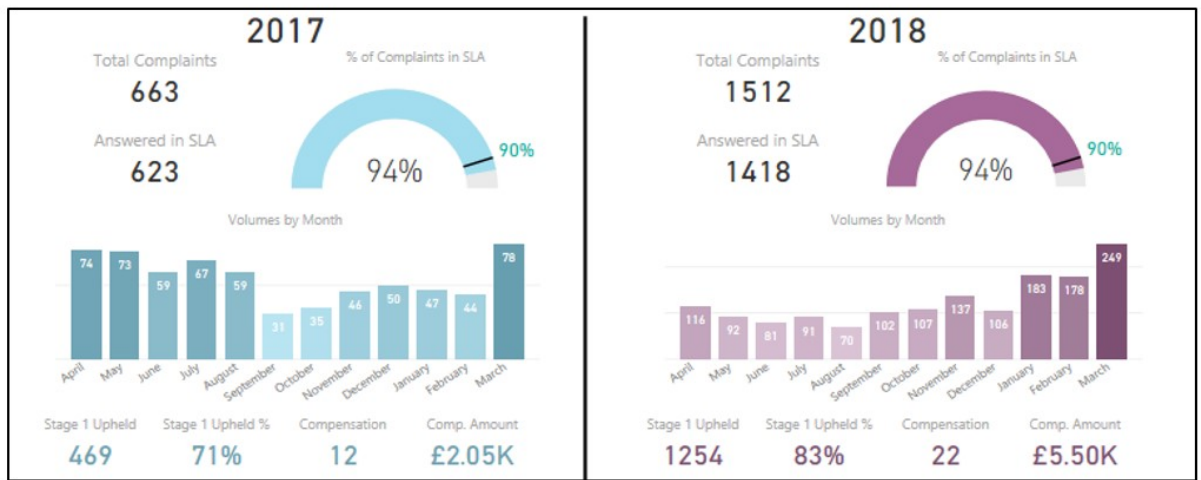
- 1.1 In April 2012 the social housing regulator, the Homes and Communities Agency (HCA), introduced revisions to its regulatory standards. As a result, there is now more emphasis on the provision of local mechanisms to involve tenants in scrutinising the performance of their landlord and resolving problems with housing services. The regulations state that *“tenants should have the ability to scrutinise their provider’s performance, identify areas for improvement and influence future delivery”*

- 1.2 In response to these regulations Croydon Council, in partnership with its tenants developed a framework for tenant scrutiny. This included the establishment of and recruitment to, a tenant scrutiny panel. During early 2012 the panel members received a range of training to prepare them to conduct effective scrutiny exercises and there is a programme of on-going training to enhance skills and knowledge.
- 1.3 The housing scrutiny panel currently consists of 5 members who meet fortnightly and have conducted a number of scrutiny exercises of various housing services to date. This scrutiny report preceded the publishing of the Social Housing Green Paper of which Effective Resolution of Complaints was one of the 5 core themes. Following on from the Green Paper, the government proposed
- a Housing Complaints Resolution Service, a new single point of access to redress that housing consumers can use
  - a New Homes Ombudsman for buyers of new build homes (announced in October 2018)
  - to bring forward legislation to close the gaps in redress services for consumers including the requirement for all private landlords to sign up to a redress scheme
  - a Redress Reform Working Group with the housing redress sector to develop the proposals outlined in the response over the coming months
  - The new plans were announced on 24 January 2019 by the then Communities Secretary the Rt. Hon James Brokenshire MP.
- 1.4 Following on from their recent investigation of the responsive repairs service, one of the concerns of the panel was the rise in the number of stage one and stage two complaints, and more importantly the number of these complaints that are being upheld as illustrated by the council's annual complaints report (see Fig. 1 and Appendix 1)

Fig 1.

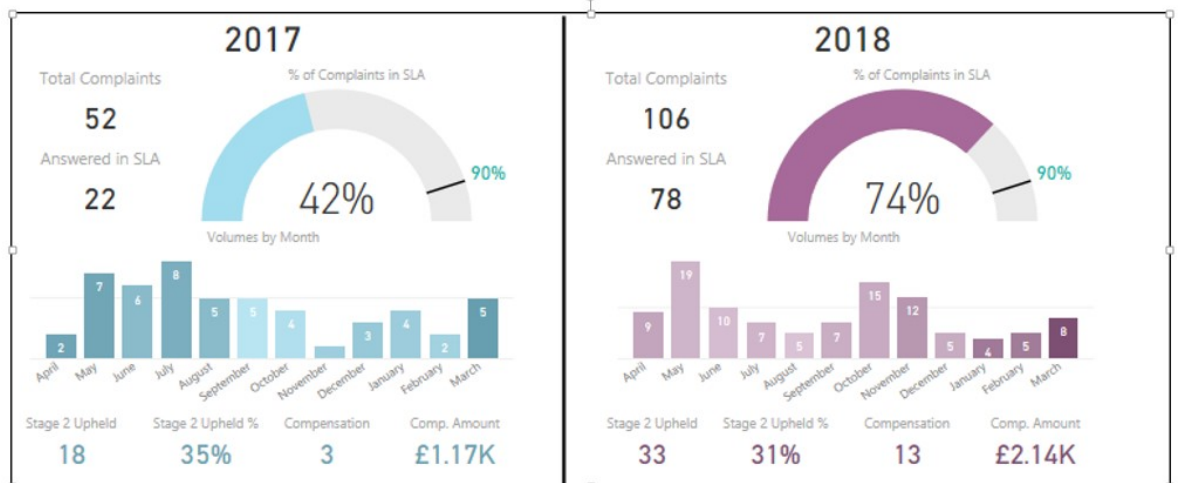
## 2. Place Corporate complaint comparisons: 2016 -2019

### Stage 1 Complaints:



\*Taken from the 2018 /19 annual complaints report  
SLA = service level agreement

### Stage 2 Complaints:



\*Taken from the 2018 /19 annual complaints report  
SLA = service level agreement

- 1.5 The complaints report (see Fig. 1) showed that in 2018 there was a **128% increase** in the number of stage one complaints for the Place department on the previous year and that **83%** of these were upheld which represents a 167% increase on the previous year (71%). However, on a more positive note, 94% of these complaints were responded to within the agreed service levels of 20 working days.

In 2018, the number of complaints that were escalated to stage 2 increased by **104%** on the previous year. Less than half of these – **31%** (15 complaints) - were upheld in comparison the 35% the previous year. This represents a decrease of

83%. Only 74% of these complaints were responded to within the agreed service level target of 20 working days.

- 1.6 The Panel agreed to look at the housing complaints handling procedure along the following key lines of enquiry:
- What complaints information is provided by the council and how is it communicated to residents?
  - How do customers make a complaint?
  - How easy is it to access the service in order to give a compliment or make a complaint?
  - Do residents understand the process?
  - Quality of responses to the complaint?
- 1.7 The panel also agreed, where possible and relevant, to use complaints benchmarking data from other similar housing providers.
- 1.8 This report details the findings and recommendations of this scrutiny exercise, which took place between July 2018 and July 2019.

## **2. SCOPE AND METHODOLOGY**

- 2.1 As part of their investigations, the Panel met with Clare Davies, Complaints Manager, who attended a scrutiny panel meeting at the end of May 2018. She gave the panel an overview of the complaints service and there was discussion around the scope of the exercise. It was agreed that the panel should look at the end to end procedure for housing complaints only, including stage one, stage two and escalation to the ombudsman.
- 2.2 The panel conducted a desktop review of the following documents relating to the complaints procedure:
- Complaints policy and procedure – customer v4
  - Complaints policy and procedure – customer v5
  - Annual complaints report – Place
  - Complaints booklet – update 2014
  - LBC complaint compensation – v3
  - Policy and procedure for persistent and vexatious complainants
- 2.3 In addition to these corporate documents, the panel reviewed complaints information that was available on the council's website. This also included attempting to navigate the website in order to access online complaints



information available to the general public. Panel members also mystery shopped the complaints service in order to log a complaint online and/or over the telephone.

- 2.4 As part of the desktop review, panel members accessed complaints information from a number of registered social landlords with a similar structure to Croydon council, for benchmarking purposes.
- 2.5 The following members of staff were interviewed as part of the exercise:
- Complaints Manager
  - Members and Residents Services Manager
  - Complaints Resolution Officer
  - Customer Contact Manager
  - Operational Manager – tenancy and caretaking services
- 2.6 Two separate resident focus group sessions were held at Bernard Weatherill House. Those involved included residents selected from the resident involvement team's involvement database who had previously expressed an interest in participating in focus groups. Those resident who were interested in joining the focus group, but unable to attend on the designated dates were asked the same questions as the focus group, but over the telephone. A small sample of past complainants were also invited to participate by sharing their experiences of the complaints procedure. In total **16** residents attended or were asked a series of questions agreed by the panel relating to their experience of the complaints procedure. The panel acknowledge that the sample of complainants is small, however GDPR rules made it difficult to get in touch with past complainants the sample was selected by the complaints manager who had to seek permission from the complainants to share their details before they were contacted by the panel.
- 2.7 The panel also looked at a number of case studies with the permission of the complainant and in accordance with general data protection regulation (GDPR). The objective of this was to investigate the quality of the responses at stage one and stage two. All case studies were redacted before presentation to the panel.
- 2.8 Panel members also felt that it was appropriate to include their own experiences of the complaints procedure (See appendix 3).

### **3 FINDINGS & RECOMMENDATIONS**

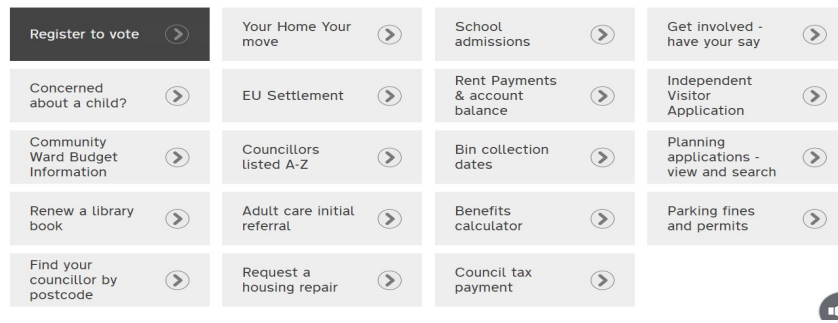
#### **3.1.0 What complaints information is provided by the council and how is it communicated to residents?**

- 3.1.1 There were no hard copies of printed material available for customers in Access Croydon regarding making a complaint and it is assumed that this is due to the council's push towards accessing online information. The panel, however, have reservations with the push for online activity and the apparent lack of provision

for those who do not have the ability or resources to engage with the council in this way.

- 3.1.2 The panel looked individually and collectively at the council's website to see what information was available about complaints. This was initially done in May 2018 and again at various stages throughout the exercise. Complaints information was not readily available from the main pages of the council's site (see Fig. 2) and panel members reported that they had to enter additional searches to find it.

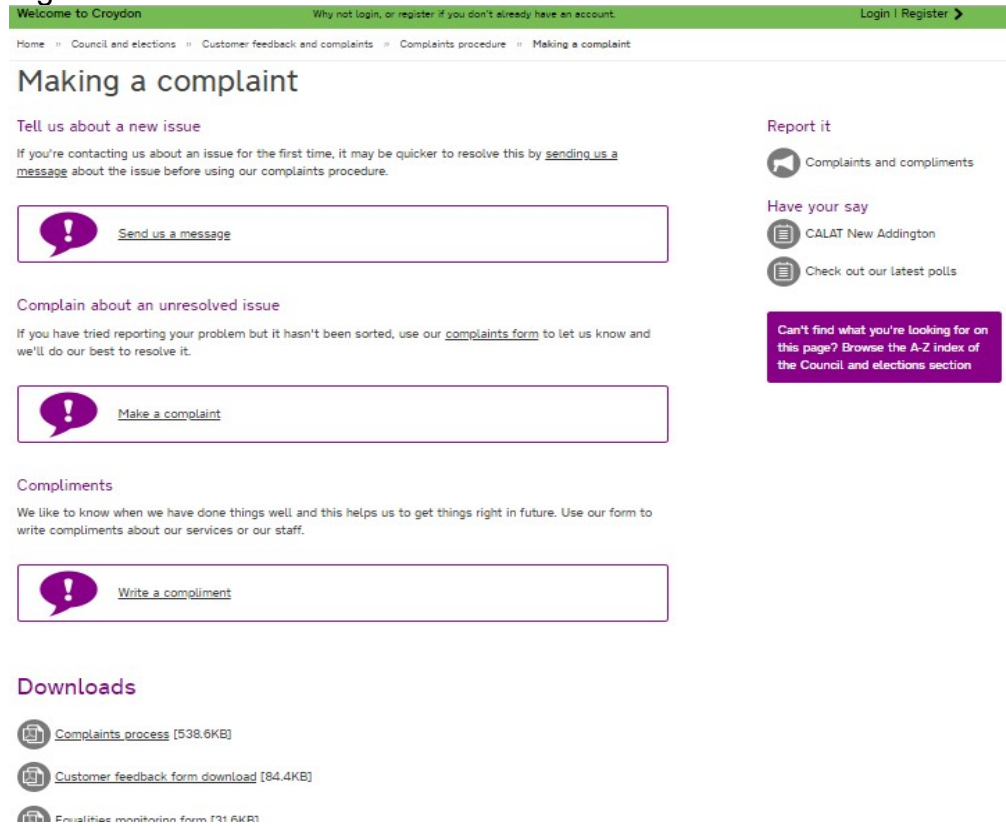
Fig. 2



\*Taken from the council's website pages

- 3.1.3 The word 'complaints' or 'complain' had to be typed into the search box in order to pull up the following information:

Fig. 3



\*Taken from the council's website pages

- 3.1.4 Selecting the 'send us a message' option brings up the following form and allows for further selections from drop down menus to target the message to the relevant department or team, in this instance - housing:

Fig. 4

## Message us

**What would you like to contact us about?**

Please select from this list. \*

Housing

**Housing enquiries**

**What is your enquiry? \***

Contact the tenancy team

**Tenancy Team**

Please [send a message to the tenancy team on MyAccount](#).

MyAccount lets you manage your council housing, pay rent, report issues in your neighbourhood and more. If you don't have one, [register for MyAccount](#).

Do you still need to send us a message?

Yes

**Housing general enquiry**

Your name

Email address \*

contact telephone number

\*Taken from the council's website pages

- 3.1.5 The form (Fig. 4) then gives the option to send the message to the relevant team via MyAccount and also allows the customer to register for an account should the user not already be signed up for one. Contact details are requested and the user is asked whether they still want to send a message.
- 3.1.6 Clicking on either the 'make a complaint' or 'write a compliment' options brings the user to the same customer feedback form below (Fig. 5):

Fig. 5

The screenshot shows the Croydon Council website's online customer feedback form. At the top, there is a navigation bar with links for HOME, A-Z, ABOUT YOUR AREA, NEWS, JOBS, and CONTACT US, along with a search box. Below this is a purple header with the text "Do it online". The main heading of the form is "Customer feedback". The form contains the following text: "Please provide as many details as possible by filling in the boxes below. The questions marked with an \* must be completed. Please note that we are unable to fully investigate anonymous complaints." There are three text input fields: "What is your complaint or compliment?\*" (with a note "(maximum 5000 characters)"), "What would you like us to do?" (with a note "(maximum 5000 characters)"), and "Do you have any comments about Croydon Council's complaints procedure?" (with a note "(if so please specify) (maximum 5000 characters)").

\*Taken from the council's website Aug 2019

This is the complaints/compliments reporting form that can be completed and submitted online. Focus group and survey candidates both reported that the box for inputting the details of the complaint was restricted to 5000 characters and that the form was time sensitive. It was felt that this could be restrictive particularly if the complainant needed more time to formulate and record their complaint.

3.1.7 The available downloadable forms included an 8 page complaints booklet and a feedback form similar to the online version. This feedback form has to be downloaded and printed before submission as customers are unable to type straight into the document.

Fig. 6 Complaints booklet



Downloadable feedback form

The image shows a downloadable feedback form titled "CUSTOMER FEEDBACK FORM". It includes the following fields: "NAME", "ADDRESS", "PHONE NUMBER", "E-MAIL ADDRESS (if you have one)", "DEPARTMENT OR SECTION IF KNOWN (see page 2-3 of booklet for details of key service areas by department.)", "COMPLIMENT OR COMMENT?", and "WHAT IS YOUR COMPLAINT?". At the bottom, it says "(see over for complaints section) REVISED FEBRUARY 2014" and "CROYDON www.croydon.gov.uk".

- 3.1.8 The online complaints booklet (Fig. 6) was colourful, easy to read and informative, giving clear information and instructions on when and how to complain, who can lodge a complaint, stage one and stage two processes, timescales, various department contact details and next steps to take when the council's complaints procedure has been exhausted and the complainant is unsatisfied with the outcome and wants to escalate their issue. However, the booklet **did not** mention that complainants could have their complaint adjudicated by a 'designated person' – who could be an MP, local councillor or tenant panel, before escalating to the ombudsman. To this end, the council's Housing Complaints panel was not mentioned. There was also no mention that complainants would have to wait 8 weeks, having exhausted the council's complaints procedure, before contacting the ombudsman. Contact details of the local government ombudsman and the housing ombudsman service were also provided although the details of the latter were incorrect, displaying their previous address. This document was last revised in February 2014. Panel members felt that the document should be updated.
- 3.1.9 On a positive note, there were options to have the document produced in larger print, Braille, on tape and in a selection of 6 other languages. None of these were requested by the panel in order to verify their availability. There was also a footnote advising customers that they could ask for copies of the booklet at the reception in Access Croydon or call the main housing number to request a copy. There were no hard copies visible in Access Croydon (August 2019) and when one of the floorwalkers was asked about the availability of the document, they advised that the document is not available and that customers visiting Access Croydon and who want to lodge a complaint, were advised to put their concerns in writing and advised of the relevant department to send the written complaint to.
- 3.1.10 Whilst the members of the panel consider themselves to be computer savvy, questions arose regarding the lack of availability of printed materials and the online complaints experience of those who were less capable of doing transactions in this way.

The online complaints reporting/feedback form (Fig. 5) asks 4 questions:

- What is the complaint or compliment?
- What would you like us to do?
- Do you have any comments about Croydon council's complaints procedure?
- Have you contacted us previously?

- 3.1.11 There were mixed feelings about the complaints information available on the website. Some panel members, focus group and survey candidates felt that there was limited information about complaints on the site and that the complaints pages needed to be updated and made more user-friendly, particularly in comparison to the websites of other registered social landlords of similar standing to Croydon. Others felt that the information was comprehensive and useful.

- 3.1.12 The panel found the website information relating to complaints was mainly about the procedure and not the process. The council's wordy complaints procedure was available as an online document with the option to download. However, the panel felt that this might be too much information for most residents to digest when they may just want to report their complaint and have something done about it. There was no clear definition of what constitutes a complaint on the web pages, however, this definition appeared on the third page of the online complaints procedure.
- 3.1.13 When panel members revisited the council's website in July 2019 and again searched for complaints pages, they noted that a number of navigational improvements had been made. However, the downloadable feedback form was the same and still had no instructions/guidelines regarding how to complete the downloaded form. It was felt that this form and process for submission could be somewhat confusing.
- 3.1.14 By way of benchmarking, the websites of other similar social landlords were looked at. The websites of Southwark, Lambeth and Sutton were found to be easy to navigate and contained comprehensive information on how to make a complaint. They also had simple forms to complete. Southwark council's site was highlighted as one of the standout sites in terms of ease of navigation, accessibility of information, comprehensive information and definitions of terms such as 'habitual complainants', as well as how these individuals are dealt with in the process. Those websites that did not score well with the panel, contained unnecessary information, no clear definitions of what a complaint is and had poor navigational cues. Customers were also not able to log an online complaint without first registering for an account.

#### **Recommendations:**

- 1.1 (3.1.2) The panel felt that it would be useful if complaints (and compliments) would appear on the main page of the council's website with comprehensive drop down menus to facilitate ease of navigation. Alternatively there could be a link to the complaints pages on the main page.**
- 1.2 (3.1.3 – 3.1.6, 3.1.11) The complaints policy and any downloadable forms should be more easily accessible from the front pages of the website. All forms should be up to date and contain the correct information and clear instructions of what to do with the completed form.**
- 1.3 (3.1.2) A more reader friendly version of the complaints policy should be available online for customers.**
- 1.4 (3.1.3) It would be helpful to have guidance notes to assist residents to complete any online forms**
- 1.5 (3.1.1) The complaints booklet/pack should be more readily available in hard copy and from Access Croydon, libraries, etc. to cater to those customers who are not able access the internet to complete the form online or download and print documents. Perhaps a shorter version of the booklet could be produced and offered with the feedback form.**

### 3.2.0 How do customers make a complaint?

3.2.1 The panel looked at the various ways that complaints could be reported. The complaints booklet was only available online which meant that customers would have to have access to the website in order to access complaints information.

The booklet advised that complaints can be made:

- Via the website
- In writing or in person
- Completing the downloadable form with the complaints pack
- Calling the contact centre

The policy and procedure document lists all of the above along with:

- Fax
- Audio tape
- In different languages

3.2.2 The complaints booklet advises prospective complainants that they can contact the council to lodge their complaint via the phone, calling the contact centre number and making a verbal complaint. However, when panel members mystery shopped the service and tried to lodge a complaint by phoning into the contact centre, they were steered towards reporting the issue online and were unable to register their dissatisfaction on the phone. Calling the number provided and selecting the 'housing' option yielded no complaints option and, after listening to a recorded message that listed all of the available options, the line went dead.

3.2.3 The panel surveyed a sample of residents who were past complainants up to stage 2 of the process. 36% of those surveyed reported that they raised their complaint by telephone and the majority of focus group members reported that they initially tried to raise their complaint by calling into the contact centre (Fig. 7) There were mixed responses from the focus groups, survey and mystery shopping exercise in relation to their experience of making a complaint by telephone.

Fig. 7



- 3.2.4 55% of those surveyed reported raising their complaint online – either by email or on the website (Fig. 7). Focus group members stated that emails were their preferred method of reporting a complaint as this method generated an automated reply and created a paper trail. It was also reported that other officers and MPs could also be copied into the email in a scattergun approach, with the hope of giving it more weight and, where MPs were involved, accelerating the response. Feedback from the focus group highlighted that there was a general email address, but no specific name of an officer who would be responsible for handling the complaint and with whom complainants could communicate directly. Some felt that they were ‘pushed from pillar to post’, often having to send a follow up email(s) in order to get a response from someone. Focus group members also reported that they are more likely to get a response if they report the complaint from their MyAccount.
- 3.2.5 Focus group and survey candidates reported being directed to the online reporting function when they had already gotten through on the phone and were speaking to an officer.

**Recommendation:**

**2.1 (3.2.5) Residents should be able to report their complaint to an officer if they are already speaking to someone either face to face or in person and, in the interest of customer service, should not be directed to end the call and then log the complaint online.**

**3.3.0 How easy is it to access the service in order to give a compliment or make a complaint?**

3.3.1 This area of enquiry is to broadly determine whether customers are able to access the complaints reporting service with ease and report their complaint efficiently and accurately. Is the service user-friendly? Can all residents log their complaint in the manner that suits them as and when their dissatisfaction occurs?

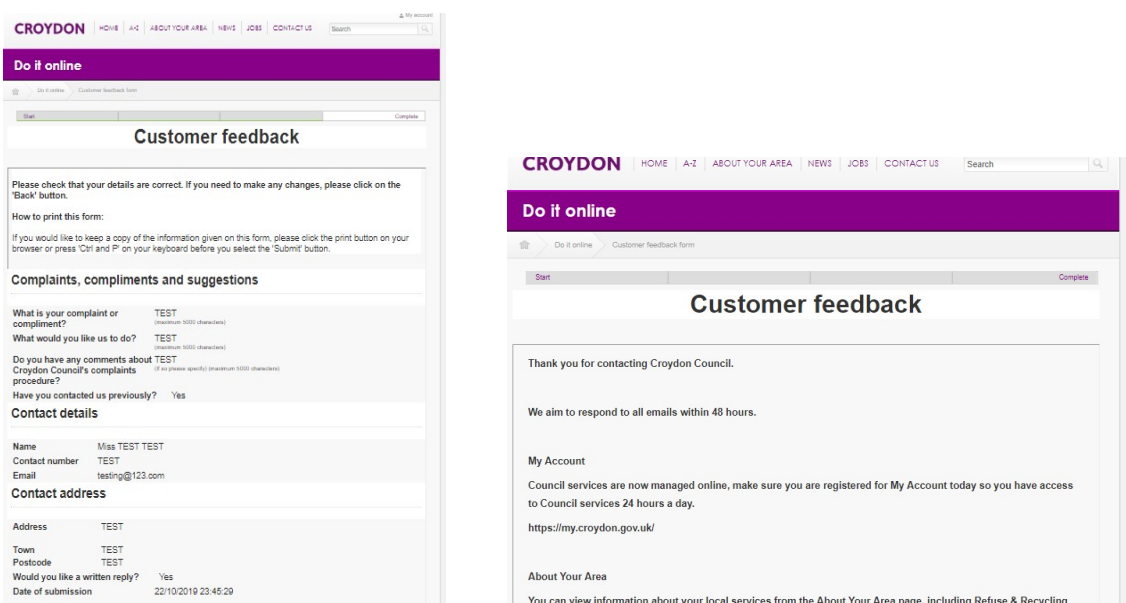
Fig. 8





- 3.3.2 64% of those complainants surveyed found it easy to make a complaint using the methods that were set out on the website (Fig.8). The difficulties that they experienced with the process arose once the complaint was logged and related to follow up actions, communication and resolution of what had been reported.
- 3.3.3 Focus group members reported that phoning in to the contact centre to make or follow up on a complaint was difficult. Group members reported that, as phone calls are not recorded, their call and details of the complaint therein would appear to be lost in the system once the call ended. If they had to call back about the same issue, there was often difficulty with continuity in the absence of access to previous records or at least the name of the officer dealing with the complaint. Closure of the contact centre at 4pm only added to their frustration as those who worked during the daytime would struggle to report issues by phone before the 4pm deadline.
- 3.3.4 Other group members reported long wait times on the telephone as well as officers being evasive and not giving their names or the name of the officer to whom the call would be forwarded. One focus group member recounted phoning in at 3.50pm and their mounting frustration as they felt the officer answering the call tried to fob them off by saying that the system was slow, hanging up or cutting the call off at 4pm without resolving the issue. Others reported that the officer on the phone directed the caller to the website/online in order to end the call.
- 3.3.5 The focus groups also highlighted that some residents found that it was not easy to report a complaint online via the website. The online reporting form is time sensitive and limited to 5000 characters per box. It was also reported that complainants did not receive a copy of what they had submitted. The completed form (Fig. 9) appears on the screen and there are instructions at the top of the form on how to print it. The form can also be saved by right clicking and selecting the 'save as' option. A message acknowledging the submitted form and advising that a response would be made within 48 hours then appears on the screen. However there is no reference number – only a time and date - and focus group members reported that they were unable to refer back to their original complaint in any future correspondence.

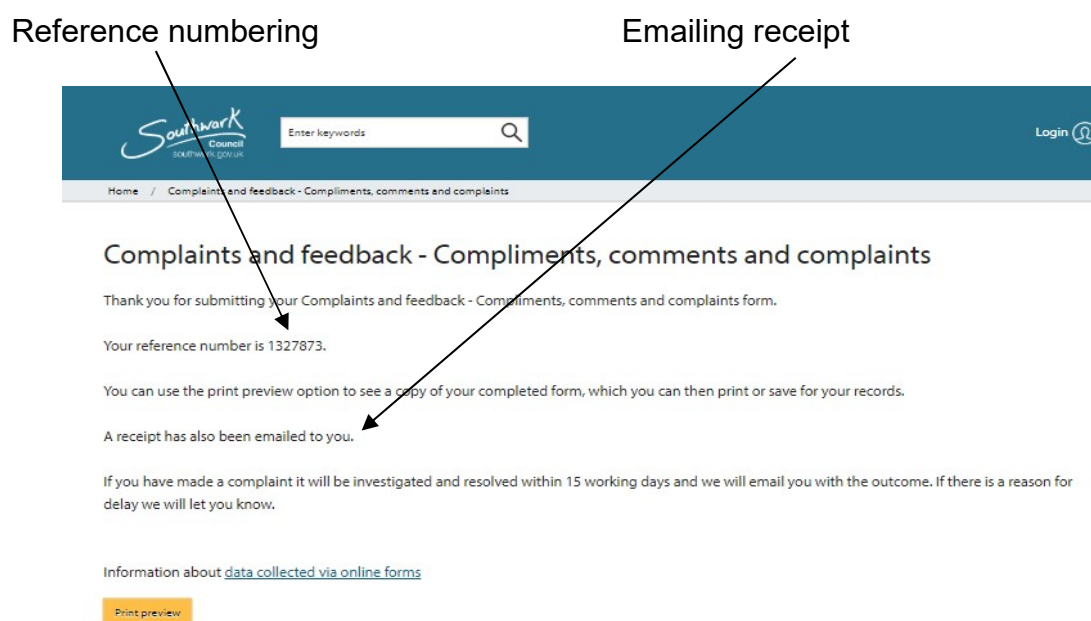
Fig. 9



3.3.6 Focus group members reported that when making a complaint online, there is no space for additional comments and no particular person to address the complaint to. This leads to a feeling that the complaint is just floating around with no identified person to take responsibility for its progression and resolution. This causes uncertainty as to whether the complaint has been registered or not. Other group members reported difficulties with navigating the website to locate and report a complaint.

3.3.7 By comparison, Southwark council's online complaints reporting form has an option to upload up to four supporting documents and also generates a reference number once the form is submitted (Fig. 10). Customers receive an on screen acknowledgement message *and* an email receipt of their complaint. The box for inputting details of the complaints has no character limit and while it could be said that this would allow complainants to ramble, panel members felt that this would allow the complainants to fully detail their complaint and not be restricted by character limits. The panel felt that being able to upload pictures or other documents was also useful and could help the complainant to fully explain their complaint and possibly speed up resolution.

Fig. 10



\* Taken from Southwark council's website

3.3.8 Panel members attempted to phone into the contact centre to make a complaint during their fact finding exercise in July 2019. From the main phone menu the caller is offered a number of options including housing. Once the housing option is selected a number of other options were listed but not one for complaints and the caller was not given the opportunity to lodge their complaint before the line goes dead.

- 3.3.9 The general consensus from the surveys and focus groups is that the written process of reporting a complaint is effective, but that the practice and execution of the process is problematic if not executed efficiently or there is a breakdown or lack of communication. Those surveyed and members of the focus group felt that complaints were easy to raise but difficult to resolve. The main issues highlighted stem from a lack of accountability of council officers to take ownership of the complaint and to communicate effectively with complainants as a matter of courtesy. The giving of stock answers was also identified as a cause of frustration by those customers giving accounts of their experience of the process. It was felt that it would be useful if there was a named officer identified as a point of contact for the complaint.
- 3.3.10 Ongoing complaints were cited by survey and focus group members as a source of stress, illness, and other negative effects on the complainant's health. Group members reported feeling overwhelmed when the process became protracted due to a general lack of communication from those dealing with the complaint. Often an issue was reportedly dealt with in a piecemeal fashion, particularly around repairs, with contractors coming out on repeated visits to correct the same issue with little or no continuity and without trying to find out the root cause of the problem.
- 3.3.11 Again, it was felt that those residents who did not have access to a computer or knowhow with online reporting methods would struggle to report their complaint. It was generally felt that elderly residents and those who did not have English as a first language may struggle to navigate the online processes.

#### **Recommendations:**

- 3.1 (3.3.2 – 3.3.6) The complaints procedure needs to cater to all needs and abilities. The website and online complaints reporting facility needs to be more user friendly for more vulnerable residents and those who are not computer savvy.**
- 3.2 (3.3.8) Contact centre phone menus should contain an option for complaints that callers can select and to report their complaint.**
- 3.3 (3.3.8) A dedicated phone number or option(s) from the main menu for those who would like to report a complaint or compliment via the phone.**
- 3.4 (3.3.5 – 3.3.7) A reference number and/or contact details of the officer/manager dealing with the complaint should be sent to the complainant along with acknowledgement of receipt of the complaint.**
- 3.5 (3.3.4) Officers who speak directly to customers should receive training to help them to identify when customers are dissatisfied and to advise customers of the formal complaints procedure without the customer having to specifically say that they want to make a complaint. This also includes having complaints handled consistently by officers involved.**

**3.6 (3.3.5 – 7) Allow more time for completing the online form to avoid time out issues when inputting information about the complaint. Also review the character count – currently 5000 characters per box and provide an option to upload files or pictures to aid in making the complaint.**

#### **3.4.0 Do residents understand the complaints process?**

- 3.4.1 All of the residents who were surveyed and interviewed understood what a complaint was and were able to give their own definition of what they felt constituted a complaint. They also understood the circumstances in which complaints should or could be raised. However, some focus group members mentioned that they were unaware that there was a formal complaints procedure and that they had often used other methods to report their complaint or issue, such as contacting other officers from various teams e.g. resident involvement, or by reporting their dissatisfaction and concerns via the neighbourhood voice scheme, where they felt they would get a speedier response.
- 3.4.2 The majority of residents involved with the focus group and survey had experienced the formal complaints process, with one or two having outstanding complaints pending resolution. This had given them an insight to the 2 stage process and a familiarity with how the process worked. Several of the scrutiny panel were also involved with the housing complaints panel and were fully aware of the process and how it works.
- 3.4.3 It was felt that there should be more publicity online and otherwise of the complaints procedure so residents were aware of their right to complain and the role that complaints play in service improvement.
- 3.4.4 Panel members looked at the procedure and policy document that is online. The definition of a complaint appears in paragraph 2.4 of the document. Panel members felt that the definition should appear earlier on in the document. The policy clearly sets out the complaints procedure, what happens during its 2 stages, timescales for response and how to escalate in the event that there is still dissatisfaction with the outcome at both stages.
- 3.4.5 There is no mention of the housing complaints panel or other designated person within the complaints procedure and policy document before escalation to the ombudsman, despite recent revision of the policy in 2018. The panel have been operational since 2012

- 3.4.6 There were spelling and content errors in the policy and procedure document found online. The address for the housing ombudsman service was incorrect at the time this report was written.
- 3.4.7 Croydon council's complaints policy only mentions 'reasonable financial compensation' but does not set out any framework for levels of compensation and how this calculated. Lambeth council has a separate compensation policy and Southwark have included compensation tariffs in the appendix of their policy. Panel members felt that a clear compensation policy or tariff would be beneficial to customers.
- 3.4.8 The 'Complaints, comments & compliments document is colourful and easy to read, concisely setting out the entire process and contact details. The panel felt that this is a comprehensive document, however, some of the contact details needed to be updated as the document was last revised in February 2014.
- 3.4.8 Overall, panel members felt that the policy document was comprehensive and informative. Croydon council's procedure was benchmarked alongside that of other similar registered social landlords of similar standing such as Lambeth, Southwark, Sutton, Westminster, Waltham Forest and Optivo.

## Recommendations

- 4.1 (3.4.1) The complaints pack needs to be more readily available in printed form for those who may not have access to the website or online facilities. These should be available from Access Croydon, libraries, community hubs, etc. to raise awareness of the complaints procedure and advise customers how to complain should the need arise.**
- 4.2 (3.4.3) The existence of a complaints procedure and policy needs to be publicised as widely as possible to residents. However, the panel do recognise that this might generate excessive complaints and overburden the existing system.**
- 4.3 (3.4.3) There should be a link on the main page of the website that takes customers to the complaints pages to avoid having to search around in order to make a complaint.**
- 4.4 (3.4.5) The role of the housing complaints panel and other designated persons should be highlighted in the policy document so complainants know what their options are and are at liberty to bring their complaint before the panel if they are not happy with the outcome of their complaint at stage 2.**
- 4.5 (3.4.6) The complaints booklet available online for download needs to be updated and the correct contact details for the ombudsman inserted.**

### 3.5.0 Quality of responses

3.5.1 The panel considered the quality of responses at both stage one and two by looking at various case studies. The complainants were contacted and agreed to have details of their case released to the scrutiny panel in compliance with general data protection regulation (GDPR) rules.

3.5.2 The following paragraph is taken from the 2018/19 complaints report:

*71% of Stage 2 investigations resulted in the customer's complaint being upheld. 59% of the upheld Stage 2 complaints resulted in compensation being offered to the customer. The trend across the upheld complaints links to no monitoring or poor monitoring following the Stage 1 Complaint. Quality of the Stage 1 response has also caused complaints to be escalated to Stage 2, as some have not addressed all the customer's concerns or did not resolve the problems raised. The complaints resolution team (CRT) are holding a Complaints Handling Workshop with Waste Management to try and enable them to be able to resolve customer's complaints fully at Stage 1 and reduce the number of follow on complaints or escalations.*

*\*Taken from the 2018 /19 annual complaints report*

The panel found evidence to support this when they looked at a sample of complaints case studies. They felt that stage one letters were often poorly written, and contained spelling and grammatical errors. The written response often did not fully address the concerns raised by the complainant or give any timescales for things to be completed, for instance estate inspections or remedial works. Indeed it appeared that some actions had not been completed at stage one. A few of the letters were also very long winded. In general there appeared to be a lack of communication with the complainant. In other instances, too many technical terms were used in the stage one letters. The panel acknowledged that this level of detail may be necessary if the case escalates, but felt that responses should be kept short and simple and address all of the issues raised by the complainant. This would perhaps reduce the number of complaints that are escalated to stage 2.

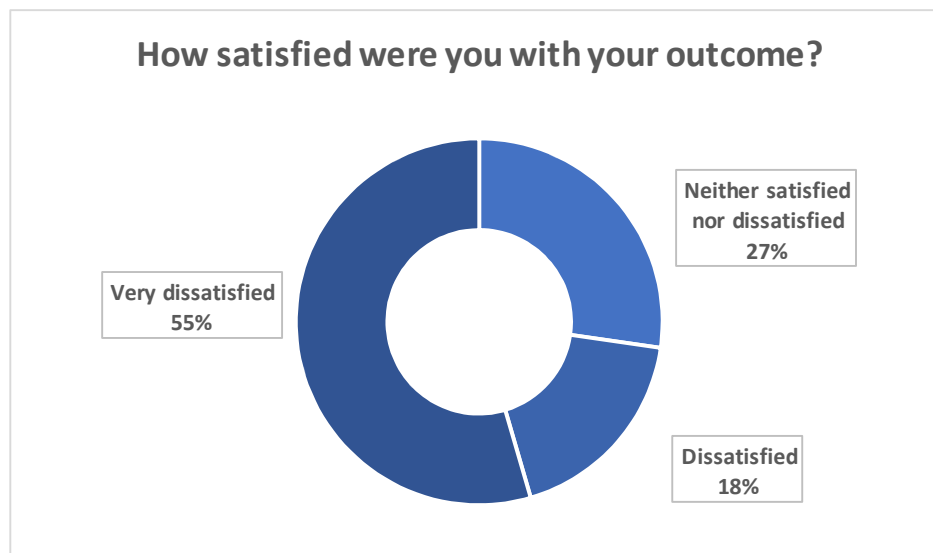
3.5.3 Stage two letters were much better grammatically, but were found to be very detailed. Panel members queried whether this was a requirement as the case escalated. Panel members felt that some of the letters lacked a certain amount of empathy for the complainant and that a poorly written letter could possibly add insult to injury from the perspective of the complainant.

3.5.4 Panel members felt that there were missed opportunities for early resolution at stage one or before it even reaches the formal complaints process. One of the panel members had direct experience of this as his need to make changes to his online account details resulted in a court summons and him lodging a formal complaint. He made several failed attempts to raise his issue via the contact centre (wait times of 20 minutes or more made it difficult to get through to the council during his lunch break at work) and emails to officers and the section in question went unanswered, during which time he received a final reminder and a

court summons. Following the complaint, the summons was withdrawn. However, had his emails been answered in a timely fashion, the issue would have been avoided. He subsequently received a letter that was less than empathetic. There were other examples of cases being unnecessarily escalated. Panel members felt that if the complaints procedure is customer focussed, then officers should take more time to try to resolve complaints in the early stages in order to avoid costly escalations and compensation pay-outs later on.

- 3.5.5 Figures from the 2018/19 complaints report show that the number of upheld stage one complaints is increasing and panel members felt that lessons are not being learned from previous complaints and the way that they were handled. However, the number being escalated to the complaints panel or the ombudsman was not increasing.
- 3.5.6 Focus groups and survey candidates felt that it was a positive thing that the service areas in question deal with stage one complaints and that stage 2 was looked at by the complaints team who conduct an independent investigation. It was suggested that each team should have a designated complaints 'champion' who would raise awareness of the importance of complaints to service improvement.
- 3.5.7 Past complainants who participated in the survey revealed that they felt that they were not listened to by officers who were responsible for initially logging or investigating their complaint. They felt that their concerns were not fully addressed and that at times they were being fobbed off. They reported a general lack of information and communication about the complaint whilst it was being investigated and not knowing who to contact for updates.
- 3.5.8 Focus group and survey members were asked whether they were satisfied with the outcome of their complaint. Of those who responded to the question, 55% were very dissatisfied, 18% were dissatisfied and 27% were neither satisfied nor dissatisfied (see Fig. 11). The dissatisfaction stemmed largely from unresolved and ongoing issues; complainants feeling as though they were being shunted around through various departments during the process with no one taking outright responsibility of the complaint; a lack of communication from council officers during the process; response letters being generic or stock answers, not fully addressing all of the elements of the complaint and the process feeling like a 'tick box' exercise (see Appendix 2 for comments).

Fig. 11



**Recommendation:**

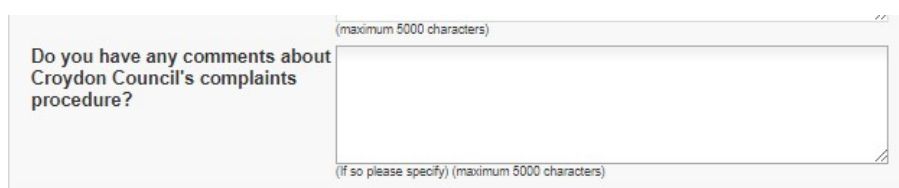
- 5.1 (3.5.2) Staff dealing with stage one complaints need training and refresher courses on how to respond consistently and effectively to reports of dissatisfaction from customers. Training should help staff to tease out the issues and address all of the concerns raised in the original complaint.**
- 5.2 (3.5.2) There should be quality checking and proof reading on all response letters that are sent out to complainants either by officers or by a resident panel.**
- 5.3 (3.5.3) Letters should be more concise and less repetitive and have more of an empathetic tone even when the council is in the right.**
- 5.4 (3.5.2 – 3.5.3) Quarterly complaints assessments should be done on a random sample of complaints to check customer satisfaction levels, whether the complaints are being handled well and to identify any trends and learning needs that arise with a view to service improvement.**
- 5.5 (3.5.2 – 3.5.8) Someone needs to take a holistic view of complaints in order to identify any emerging trends and to deal with them accordingly before they escalate**
- 5.6 (3.5.4) Review timescales for responding to complaints. Acknowledge complaints within 2 working days of receipt.**
- 5.7 (3.5.8) Where possible, investigating officers should meet with complainants to discuss the issue and to give the complainant the opportunity to discuss the evidence further.**



### 3.6.0 ADDITIONAL FINDINGS

- 3.6.1 Interviews were conducted with various members of staff who deal with complaints as part of their job.
- 3.6.2 All staff interviewed were able to give their definition of what constitutes a complaint and were aware of the importance of complaints to service improvement and delivery within the council. They were also able to identify the various ways in which complaints can be raised – formally and informally and appeared to be familiar with the council's complaints handling procedure.
- 3.6.3 Several staff members reported that the IT systems for logging and monitoring complaints is slow, 'clunky' and not user friendly. This was cited as one of the main challenges to the complaints handling process. There are reportedly difficulties with accessing larger documents and in communicating with more than one service area to gather information regarding the complaint when carrying out investigations. There are also difficulties and delays with getting responses from the various service areas or the complainant within the agreed timescales, leading to delays and missed targets.
- 3.6.4 Staff responsible for logging and investigating the first stage of the complaint once it is passed to their service area felt that a lot of time is spent making enquiries and gathering information to respond to the complainant. They felt that, in an ideal world, this could be solved by increasing staff resources around complaints handling as well as staff training to improve officer's skills in dealing with customer complaints.
- 3.6.5 Officers from the complaints resolution team appeared to be very passionate about complaints and felt strongly that complaints handling should be part of everyone's job. They are currently rolling out training to other teams and departments across the council around how to identify complaints and respond effectively within the timescales.
- 3.6.6 There is a section on the online reporting form that asks customers whether they have any comments on the council's complaints procedure (Fig. 12). Panel members felt that information from this section of the form could help to inform service improvement. However, the complaints resolution manager confirmed that complainants often do not complete this section.

Fig. 12

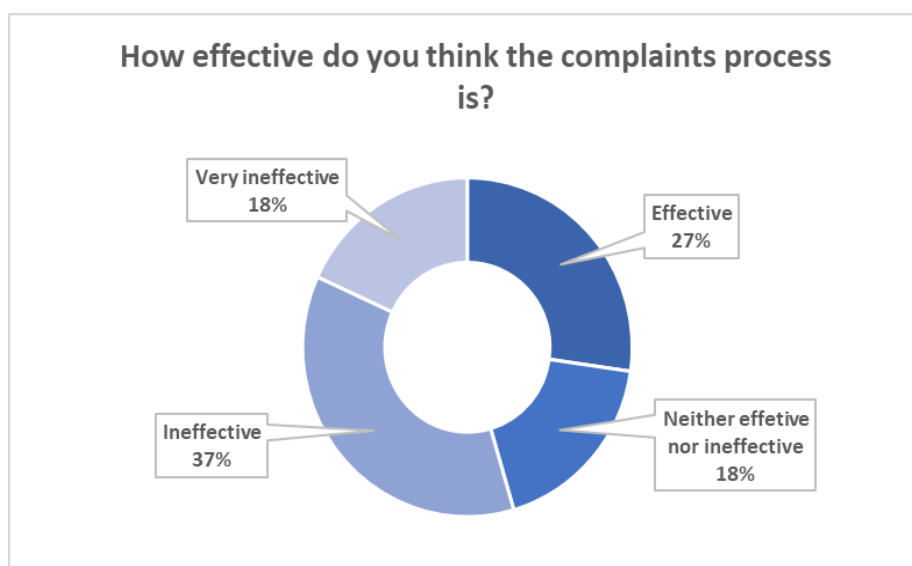


The image shows a screenshot of a web form. On the left, there is a text label: "Do you have any comments about Croydon Council's complaints procedure?". To the right of this label is a large, empty rectangular text input field. Above the top right corner of the input field, there is a small grey box containing the text "(maximum 5000 characters)". Below the bottom right corner of the input field, there is another small grey box containing the text "(if so please specify) (maximum 5000 characters)".

\* Taken from the council's website

3.6.7 Additionally, there is no monitoring of complainants *after* their cases have been closed in order to monitor customer’s experience of going through the complaints procedure at various levels. Again, this is a missed opportunity to gather feedback about the process to remedy problems or failures in the delivery of council services. Only 27% of survey and focus group members felt that the council’s complaints process is effective (Fig. 13). Feedback from those surveyed showed that much of the ineffectiveness centres on complainants feeling that the process is inefficient and that their complaint drags on without much communication on the progress to the complainant. Panel members felt that this is something that needs to be addressed.

Fig. 13



3.6.8 Focus group and survey candidates were asked what they would change about the complaints process. There were a range of answers and comments to this open ended question (see Appendix 2 for comments). The more frequent responses included changes or improvements to timescales to make the process quicker, more frequent updates to complainants, identifying who is investigating, monitoring of repeat complaints about the same item, customising emails and more thorough investigation in the early stages.

**Recommendations**

**6.1 (3.6.3) Issues with the IT system for logging complaints need to be addressed and resolved to facilitate smoother running of the complaints handling procedure. The complaints handling team should have a system that allows them to gather the relevant information in order to fully investigate the complaint.**

**6.2 There needs to be a change in the way that the various services view complaints. It should not be looked at negatively, and is an opportunity**

**to improve services rather than a criticism.**

**6.3 (3.6.7) Complainants should receive an 'exit' questionnaire to monitor their experience and satisfaction levels with the complaints procedure (not the outcome) once their cases have been investigated, responded to and closed. These should then be regularly reviewed and any trends identified for service improvement purposes.**

## **4.0 CONCLUSIONS & NEXT STEPS**

- 4.1.1 The panel concluded based on their findings that the council's complaints procedure is comprehensive, but that the execution is often problematic particularly where the service in question is involved. More needs to be done to impart the importance of complaints to service development and improvement across the council. However, the policy needs to be updated to reflect recent changes in complaints handling and to include the designated person stage in the text and diagrams. All communication regarding complaints should be regularly updated, checked for accuracy and circulated to relevant teams.
- 4.1.2 Those officers interviewed from the complaints handling team came across as being very passionate about their job, recognising the importance of complaints resolution and handling. They held a positive view about the place of complaints in service delivery and are instrumental in conveying this to other service areas as they roll out complaints handling training to various teams. The independent investigation carried out by the complaints handling team at stage 2 of the process was viewed positively by the panel.
- 4.1.3 The existence of a complaints procedure needs to be more widely publicised to residents, along with clear instructions and criteria to avoid excessive or unnecessary complaints. Some focus group and survey members appeared not to be aware that the council have a formal complaints procedure.
- 4.1.4 Despite the online push by the council, provisions still need to be made to make the process accessible to those customers who do not or cannot access online services.
- 4.1.5 Greater attention to detail is needed in the initial reporting stages of the process in order to facilitate early resolution and avoid costly escalation and compensation pay-outs. If officers are able to extract relevant information from the complainant when the complaint is first logged and investigated, then the issue may not have to progress through the formal procedure stages and may be resolved at the service level.

- 4.1.6 The complaints reporting procedure needs to be tightened up to ensure that when a customer does have cause to lodge a complaint, they can do so easily and in the manner that they choose to complain, that it is directed to the correct team, that the customer is kept abreast of the progress of the complaint, given the name of an officer or team responsible for its resolution or investigation and receives a tailored response that addresses all of the issues raised in their original complaint.
- 4.1.7 Gathering relevant feedback from past complainants regarding their experience of the complaints procedure could unearth any problem areas and produce valuable lessons learned for future service improvement. 73% of those past complainants surveyed or involved in the focus group were dissatisfied to some degree with the outcome of their complaint, with the remaining 27% being neither satisfied nor dissatisfied. Although the scrutiny sample is very small, regular random samples of those experiencing the process could shed more light on the issue with a view to improving the customer experience.

## SCRUTINY PANEL

Our job is not to browbeat anyone or to complain, but rather to look at a service dispassionately to see what it is supposed to do, how it does it, and assess whether or not there is a disconnect between the two and whether it meets the requirements set out by the council and sometimes central government. It is equally important for us to assess whether or not the service meets the needs of Croydon residents - mainly tenants and leaseholders but sometimes freeholders too. We make recommendations based on what we find and draw up a plan together with the service in question to address any areas that may need fine-tuning. Most of the time only moderate steps are needed but the job could not be done without “buy in” from the staff at Croydon council.

### PANEL PROFILES:

**Rosie Burke** is the scrutiny panel independent housing expert. Rosie is a housing professional with over 25 years housing experience and has Masters in Housing policy and Law. Her role is to help guide and assist the scrutiny panel with any housing-related issues.

**Petrena Johnson** is a local resident who has a strong affinity to Croydon having lived in the borough for almost two decades. She likes to get involved and give back to her community in order to help improve the lives of others. Petrena is a new recruit to the panel and has an HND in Business Management.

**Sheryl Read** is a retired nurse who has lived in Croydon since 2010. She was keen to use her transferrable skills and inquisitive nature to help effect change from the inside and make a difference to fellow residents and the local authority. She is one of the original scrutiny panel members and has been involved in the majority of scrutiny exercises conducted by the panel. Sheryl also sits on a number of council panels including the housing complaints panel and the sheltered housing panel all of which she enjoys and finds very rewarding.

**Guy Pile-Grey** has been a Croydon resident since birth (with a few stops along the way!) and a council tenant for almost 20 years. He has been part of the scrutiny panel since it's inception and joined because he wanted to make a difference and be part of the process of making things better. His involvement has given him a healthy respect for the work that others undertake on behalf of Croydon residents and he firmly believes that working together can make a positive difference to the places in which we live.

**Yaw Boateng** is a training administrator for the NHS whose leisure pursuits include photography, reading and research, scrabble, DIY and project planning. He has been an involved resident since 2013 and is currently the chair of the council's tenant and leaseholder panel. As well as the housing scrutiny panel, he also sits on the housing complaints panel, is a member of the association of the association of retained council housing (ARCH) and was recently elected to the See the Person National Committee. Being part of the council's resident involvement structure has helped him to understand

how the council works, enabled him to influence the delivery of housing services and make a positive difference for himself and the community.

## **APPENDICES**

### **Appendix 1**

#### **COMPLAINTS SCRUTINY QUESTIONS**

- What do you understand a complaint to be?
- How effective do you think the complaints process is?
- How did you raise your complaint? Was it easy to do?
- What changes, if any would you make to the existing complaints process?
- How satisfied or dissatisfied were you with the outcome of your complaint?

### **Appendix 2**

The following comments were made during the survey:

- The process is not as quick as it should be...
- It feels as though residents get fobbed off all the time
- No improvement seen on my complaint and not even responded to
- Why ask if contacted previously as it has no effect on the process. It would be good if the history of the complaint could be more easily documented
- The process would be faster if the complaint was logged directly with no bounce back email. Direct email with a reference number.
- More investigation, such as checking with neighbours
- 'I just wanted an apology'
- Customised emails
- Officers held accountable
- Regular reminders to investigating officers
- Issue not resolved – initial contact made with relevant departments but no real action to resolve. Feels like a 'tick box' exercise.

### **Appendix 3**

#### **YAW BOATENG**

##### **My experience with the Council's complaints process**

I wanted to change the account from which my direct debit for council tax was being taken.

After unsuccessfully checking on My Account, I tried to call the contact centre on a few occasions and on all the occasions the average queue time was in excess of 20 minutes (minimum).

The only chances I had to call was during my lunch breaks. I then decided to email the 'Croytax' address (cc'ing the Head of Income, all to no avail).

Whilst all this was going on, I received final reminders, culminating in a court summons. Based on my experiences, I felt it necessary to raise an official complaint. The final outcome of which was that the summons was withdrawn.

**Desired 'Learnings' I hope will be taken on board and implemented:**

1. Improve the navigation on My Account - user friendly and easy to find information.
2. Respond in a 'timely' fashion to emails, to 'Crotax'
3. Officers to, at least, acknowledge emails addressed to them and advise of next course of action in the process, if they are not going to deal with the query directly.
4. Once a complaint has been registered, the complainant to be given a named officer to contact for updates.
5. For the council to seize the opportunity to 'nip issues in the bud' at an early stage to avoid complaints in the first place.
6. For correspondence to be worded in a respectful way, for example, it was stated in the final response to my complaint that (and I paraphrase) 'the council was right in issuing the summons' - this is like adding insult to injury, as when all of the circumstances are weighed up, had the right procedures been in place, this complaint wouldn't have been necessary.