

Customer Scrutiny Review – Stage 1 complaint responses

A SCRUTINY REVIEW CARRIED OUT BY TENANTS AND
LEASEHOLDERS OF GATESHEAD COUNCIL'S STAGE 1
COMPLAINT RESPONSES

Scrutiny Review of Stage 1 complaint responses

1. Introduction

There has been a steady build-up of evidence that shows tenants are dissatisfied with the Council's approach to dealing with Housing complaints. The tenant satisfaction survey in 2022.23 showed that only 21% of respondents were satisfied with the Council's approach to complaint handling and this has only increased to 26% in 2023.24.

Additional evidence from a follow up survey and discovery exercise carried out with tenants that expressed dissatisfaction with complaint handling in the survey highlighted a number of issues, such as communication during the complaints process – suggesting that the overall customer experience is poor.

The Housing Ombudsman complaint handling code became statutory in April 2024, which means that landlords are obliged by law to follow its requirements. The code informs landlords about the information that the response must include. This criteria is detailed in the Methodology section of this report on page 2.

In response to this build-up of evidence and the low levels of satisfaction relating to complaint handling, the Resident Influence Panel commissioned a scrutiny review of Gateshead Council stage 1 complaint responses across all Housing Services. The aim of the review was to scrutinise the standard of the Council's stage 1 complaint responses and identify any barriers preventing the complaint from being resolved.

A focus group of tenants and leaseholders was set up to carry out the scrutiny review including David Chambers, Flo Wood, Ann Hunter, Bernie Miles, Beverley Lewis, Pauline Bedford, Sheila Blatchford, Sheila Bouitieh and Jonny Wray. Officer support was provided by Simon Hand (Involvement and Diversity Officer) and Andrew Dodds (Customer Feedback and Insight Officer).

2. Methodology

Focus Group

The group met and discussed the importance of there being a clear standard of response which should be applied to all Housing related stage 1 complaints.

The group identified and agreed a template to scrutinise a randomly selected sample of 6 complaint responses against. The sample of responses included complaints across a variety of issues such as outstanding repairs, issues with terminating a tenancy, adaptation works, and a resident requesting permission to carry out their own works. The letters were fully anonymised and scrutinised by the group. The template was agreed based on the HO's guidance as well as details that the group felt mattered to residents in a complaint response.

The template criteria reviewed whether the complaint response included:

- The complaint stage
- The Council's understanding of the complaint
- The Council's decision on the complaint
- The reasons for any decisions made
- The details of any remedy offered to put things right
- Outlining the detail and agreeing communication relating to any outstanding actions yet to be taken.
- Contact details for the investigating officer
- Details of how to escalate the complaint to stage 2 if the customer remains unsatisfied
- Details about the Housing Ombudsman's service

3. Summary of Findings

The review concluded the following findings:

Inconsistency in the structure of the letter– There was inconsistency with the overall structure of the sample of responses. It was identified that despite the council having a standard template for letters, the letters were all written in a different format and the standard template was not applied universally.

Jargon and unclear language – There was too much jargon and 'Officer speak' in the letters. For example, using terms like planned works, scheduled works, voids, etc. In general, the language used in the letters is often too formal and business like. In addition, long sentences and words make some examples difficult to understand. The group felt that some customers may not be able to understand the letter and may be too embarrassed to ask for clarity.

Responses don't feel personal – The responses are too formal and lack a personal touch. For example, in a complaint response the Council regularly refer to 'the property' rather than 'your home'.

The Council's understanding of the complaint – In some examples, the response failed to outline the Council's understanding of the complaint. The HO's complaint handling code outlines that the landlord must explain their understanding of the issues being raised by the customer and outline them clearly in the response to evidence the landlord fully understands the resident's concerns. In these cases, the response was not compliant with the HO's complaint handling code.

Investigating Officers contact details – In some examples, there were no contact details for the investigating Officer dealing with the complaint to allow the resident to get in touch easily to discuss the response. Others only included an email address for an Officer and omitted a telephone number. The group felt that we should ensure that the customer is contacted via their preferred contact method.

Inconsistent Housing Ombudsman information – Some of the examples didn't include details of the HO service. The complaint handling code outlines this must be provided with every stage 1 response.

Lack of information on outstanding actions – A number of examples had outstanding actions, such as repairs yet to be carried out. In these cases, there was a lack of detail relating to when the customer could expect the actions to be completed or a clear agreement on how/when any progress would be communicated. The group felt that they would expect to be given a timeframe for any outstanding work to be completed, rather than be informed the Council would contact them when they could carry out work which prevents the complaint being resolved.

Too much detail - A number of responses were too wordy and contained too much detail. These responses also contained large blocks of text which were difficult to read. It's felt that customers would be put off by long letters and would prefer a 'less is more' approach.

Reading age – The reading age of the average example letter is too high. Of the examples analysed, the reading age varies from 11-12 to 14-15 years.

Reading age refers to the level of education or age at which an average person can understand a text, measured using formulas like the Flesch-Kincaid Graid Level or Gunning Fox Index*, which consider factors such as word length, sentence complexity, and syllable count.

The target reading age should be 8 years old because this ensures the content is accessible and easy to comprehend for a wider audience, including those with varying levels of reading ability and non-native English speakers. Lowering the reading age not only makes the information more inclusive and accessible but also enhances clarity and engagement by simplifying language and reducing cognitive load, thereby improving overall understanding and retention.

Quality – A number of spelling and grammar mistakes were identified in the examples, suggesting quality checking is lacking before a formal response letter is sent to the customer. The group felt that as the customer, you feel that your complaint hasn't been taken seriously if the complaint response lacks professionalism.

Timescales for escalation – Customers are given 10 days to respond to a letter and request an escalation to stage 2. Customers feel this isn't always enough time to consider the response and whether the complaint needs to be escalated. This is not a requirement of the HO's complaint handling code but is outlined in the Council's complaints policy.

Impartiality – There is a lack of an independent review on complaints, all of the responses were written by the service the complaint was about.

Consistency – By looking across the sample letters, it's clear that the structure and quality of complaint responses varies depending on which service is responding to the complaint.

4. Recommendations

- Review and update the current standard letter template and ensure it's implemented across Housing Services.
- The addition of a paragraph to the letter template to ensure the investigating Officer agrees a communication strategy with the resident as to how and when any outstanding actions will be communicated.
- Add the Investigating Officer's contact details to the first page of the letter, rather than in the text at the end of the letter. This would help the customer to see this information straight away and refer back to if they need to get in touch.
- Ensure that the language used in letters is clear and understandable. The person writing the letter should make sure that there is no jargon used. If there are some technical things to discuss in the letter, these should be put into simple terms so they are understandable for everyone.
- Deliver further training to officers responsible for investigating complaints. Training could include:
 - Reminding Officers to ensure letters are quality checked before being sent, this includes being checked by another Officer.
 - Reminding Officers where to find the template letters to ensure older versions with outdated information are not used.
 - Ensuring appropriate contact details are provided for the investigating officer in the letter.
 - Guidance on appropriate language when writing a complaint response letter.

Specialist Complaints Team

All residents on the scrutiny group felt that we should introduce a centralised team to handle all complaints about Housing Services. The benefits to this for the customer include:

- The complaints process will be more accessible and easier for the customer, with a single team to contact to report a complaint.
- The approach to complaints will be more consistent, with a smaller team dealing with complaints instead of Officers and Managers across Housing Services. This will make monitoring consistency and providing training much easier for the Council.

- This team would be more familiar with the complaints system, ensuring consistency in both record keeping and following the correct processes.
- A centralised storage location for complaints documents, including information and contact records from customers. This will ensure that no information is missed that could affect a complaint response.
- It would allow for one point of contact if the complaint is about multiple issues and different services. This prevents customers from being referred to other services during the complaints process.
- An independent and impartial view on complaints, as the complaint wouldn't be investigated by the service it's about.
- This will relieve pressure on other services to carry out actions required to resolve the complaint, rather than have time taken up investigating and writing complaint responses.
- One person would be assigned to the complaint, which would make it easy for the resident to contact that person. But also, a single team would be easy to contact to help if that officer is unavailable.
- This approach would offer a more personal service to customers to allow them to feel listened to.
- Customers would feel more confident with the Council's approach to complaint handling, which could lead to fewer escalated complaints or HO investigations.
- Section 4.1 of the complaint handling code states that landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). The Council is not currently compliant with this section of the code.