

Business Plan 2023-24

**Using our values to deliver an independent, visible and
proactive Ombudsman**

Date: May 2023

Foreword

This business plan, covering year two of our [Corporate Plan](#), comes after the inquest into the tragic and preventable death of Awaab Ishak. The period following the inquest has led to another spike in enquiries and complaints to our service which has been handling unprecedented volumes of casework since 2021-22. The cost of living crisis and economic pressures will most likely lead to more disputes in the coming months. This plan also precedes another twelve months in which the landscape of social housing regulation and the role of the Ombudsman will change, with the likely passage into law of the Social Housing (Regulation) Bill.

Taken together, these events mean the Ombudsman will never have had such significance: both in setting standards for local complaint handling, resolving individual disputes and promoting learning from complaints to improve services. This will require a step-change in resources to respond to both the unabated demand for independent dispute resolution and engagement with our work, if landlords are to deliver service change to prevent complaints arising.

From next year, we expect the Ombudsman to undertake around 10,000 investigations annually. This is considerably higher than the past – about a four-fold increase. These volumes could become the new normal rather than a reaction to recent events: ensuring the most vulnerable residents are aware of our service is essential as well as ensuring it offers a genuine alternative to the courts for resolving disputes.

Progress has been made. About 70% of social tenants say they are aware of the Ombudsman; this demonstrates our service is more open and accessible rather than distant and remote. However, that so many social tenants need us to investigate their complaint, and that about half result in maladministration, is concerning. This reinforces the need for us to share more learning from complaints and use of new powers to extend investigations into both sectoral issues and individual landlords where we have concerns. This is an essential part of the fabric of an effective social housing sector and our unique, bottom-up approach based on the daily experiences of residents using landlord services is an essential complement to the regulator's focus on its standards.

Our first priority is to ensure we have the capacity to manage the increased demand for our service. Presently, every month we receive more casework than we have caseworkers available to investigate. But we have recruited to meet this unprecedented demand, as well as implementing efficiency improvements. While the climate for recruitment has been challenging, it is evident that many people from diverse backgrounds want to work at the Ombudsman and deliver our vision. And while my team has worked

exceptionally hard at managing the high volumes, we simply have not been able to deliver as many investigations as quickly as we would like, so during 2023-24 we will require more resources so that we can meet both demand and expectations.

Crucially, the nature of our casework is changing. It is more complex and involved; we are making more findings; we are ordering more remedies; and we are, at times, struggling to piece together events given the poor evidence and records provided. Evidently, from an assessment of current investigations, a significant proportion involve highly sensitive circumstances. That we witnessed a tenfold increase in severe maladministration findings in 2021-22 underscores the seriousness of the issues we are examining. I expect our casework to achieve high-quality; moreover, that's what my colleagues want to deliver. So I am clear that despite the pressures we will not compromise on quality.

The work we do is an alternative to the courts – it is in-depth investigation and not a light touch review of the landlord's final response. It is also less adversarial and a free alternative to legal action. This takes time but we also recognise it needs to be timely, given the frustration residents usually feel with the landlords' process when their case reaches us.

Over the coming year we will also further roll out our new casework portal which will allow for swifter updates on the progress of cases and support evidence gathering. This is part of our continued focus on high quality, efficient, impactful casework with high levels of customer service, and our new operating model has enabled us to provide more learning for the sector and deliver greater transparency.

This business plan will span a year of further change for social landlords. The Social Housing (Regulation) Bill, subject to Parliament, will see our Complaint Handling Code taking steps towards being a statutory document and the broadening of our orders to prevent service failure being repeated. The Access to Information Scheme for housing associations, where the Ombudsman will act as the appeals body, should progress. The Ombudsman's Centre for Learning to promote fairness and service improvement for the benefit of all landlords and residents will take shape. The potential to extend redress to private tenants provides opportunities too.

The importance of learning from complaints is integral to our work as an Ombudsman. An Ombudsman promotes accountability and learning, and we use transparency to promote a positive complaint handling culture and behavioural change. The sector has been responsive, and positive, about this work with around two out of three landlords telling us they have changed something as a result. We plan more work on systemic issues whether at a landlord or sector-wide level, and we will set out how we will develop

this important role in an updated systemic framework. This work is essential if more complaints are to be resolved successfully at a landlord level and, over time, demand for our service is to reduce.

Our service is driven by our vision and our values: they inform what we do and how we do it across the organisation on a day-to-day basis. We believe these values apply equally to the sector, especially during a period where there will be significant change as fairness, a willingness to learn, openness and excellent services will ensure landlords can continue to deliver effectively for their residents who are able to live in safe, warm, secure and decent social housing.

Richard Blakeway
Housing Ombudsman

What we do

Our role

- Make the final decision on disputes between residents and member landlords. Our decisions are independent, impartial and fair
- Support effective landlord-tenant dispute resolution by others, including landlords themselves, and promote positive change in the housing sector

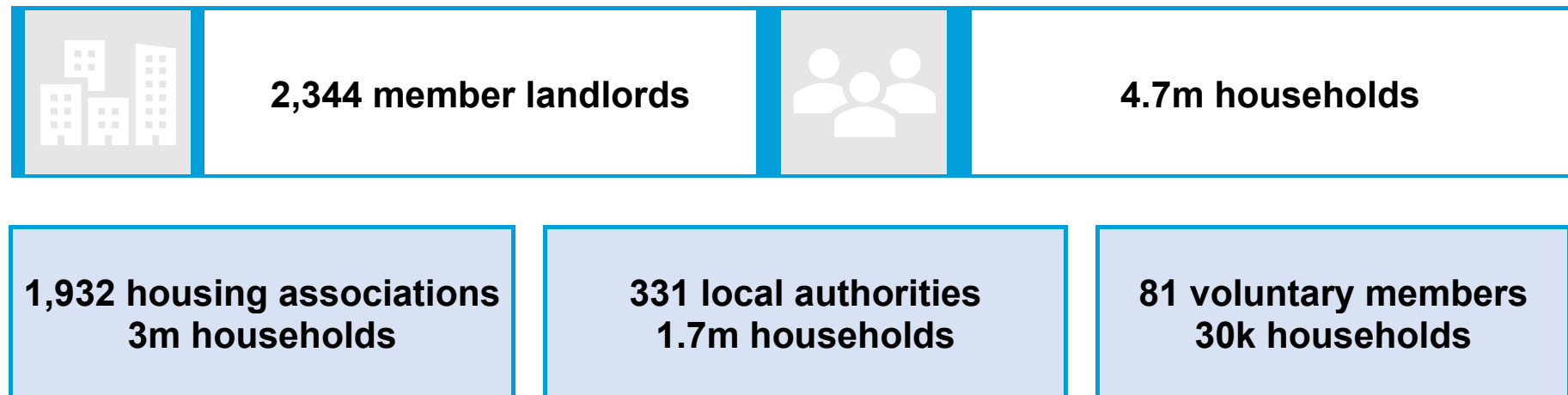
Our service is free to the 4.7 million households eligible to use it.

Our role is set out in the Housing Act 1996 and the Housing Ombudsman Scheme approved by the Secretary of State.

Our membership

Membership of the Scheme is compulsory for social landlords - primarily housing associations who are or have been registered with the Regulator of Social Housing and local authority landlords. Additionally, some private landlords are voluntary members.

Membership as at 31 March 2022



The Scheme is funded by subscriptions from members and is paid on a per housing unit basis.

Our vision, values and process

Our vision

Improving residents' lives and landlords' services through housing complaints

Our values

► Fairness	► Learning	► Openness	► Excellence
We are independent and impartial; we take time to listen carefully and to understand the evidence	We share knowledge and insights to maximise our impact and improve services	We are accessible and accountable; we publish information on our performance and decisions	We work together to provide an efficient, high-quality service

Our process

	Dispute support	We support the resolution of complaints while they are within the landlord's complaints process
	Dispute resolution	We make the final decision on complaints that remain unresolved through independent, impartial and fair investigation
	Sharing learning	We use our knowledge and insight to improve housing services by sharing learning across the sector

Achievements in the year to date

Most of our activity in 2022-23 to date has been focussed on delivering the significant headcount expansion needed to meet the unprecedented surge in demand experienced during 2021-22. As we have now uprated our assumptions related to growth in demand following the tragic death of Awaab Ishak, our expansion programme will continue into 2023-24. To the end of January, we have appointed 196 permanent roles out of a total number of 225 vacancies, representing an expansion of 194% on our headcount as at 31 March 2022.

Demonstrating our commitment to equality, diversity and inclusion, we have operated a blind recruitment process and applied the Disability Confident scheme requirements to guarantee an interview to anyone with a disability. Of all interviewees, 29% were from an ethnic minority background (compared to 14% nationally and 15% in social housing). Of the job offers made (totalling 204 by end of January), and where we have diversity information (77% response rate), 25% were to those from an ethnic minority background.

Other work delivered so far under our values-based corporate plan is set out below:

Extending fairness

- We successfully made the case to expand our powers and the Social Housing (Regulation) Bill now includes provisions for wider learning orders on individual complaints, putting the Complaint Handling Code on a statutory basis with a duty to monitor compliance against this, and enabling us to publish best practice and require landlord assessment against it.
- We have reviewed our jurisdiction, investigation, outcomes and remedies guidance, incorporating some of the recommendations from the Levelling Up, Housing and Communities Select Committee Report into the Regulation of Social Housing, and updated our Scheme for the removal of the Designated Persons requirements. These are all available on our website.
- We have published a Spotlight Report on noise related complaints.
- We have published four paragraph 49 reports on landlords which look in depth at substantive issues or complaint handling at individual landlords to provide insights to strengthen learning.
- Developed our quarterly Insight Reports so case studies contain examples of where landlords have handled complaints well.

Encouraging learning

- Landlord surveys have been completed to give us an insight into local complaint handling and the impact of our learning work. These show that 66% of landlords changed their complaints policy or process as a result of self-assessment against the Complaints Handling Code and 59% had used the findings from our thematic Spotlight reports to make changes to their service delivery policies.

Increasing openness

- We refreshed our Complaint Handling Code to include much stronger provisions around landlord awareness raising and these have been incorporated into the self-assessment.
- We continue to hold Quarterly 'Meet the Ombudsman' events.
- We have begun to build a better picture of the resident demographic and geographic groups which access our service less frequently and we are working with our Accessibility Expert Panel to understand how best to target these.
- We continue to work with DLUHC to plan the Access to Information Scheme appeals service.

Achieving excellence

- We have started to develop our corporate social responsibility approach by launching a volunteering policy for colleagues alongside our annual supplier social value survey.
- We have implemented a people programme to promote and maintain high performing teams.
- We have begun to develop our equality, diversity and inclusion (EDI) programme, relaunching the various colleague-led networks that will feed into this and promoting all aspects of EDI through our expanded workforce.
- We opened a small Manchester hub and moved to new, smaller accommodation in London which matches our needs and supports hybrid working without increasing our overall office costs.
- We have started to trial our online complaint handling portal with a small group of landlords and will continue to roll this out in managed phases.

Key planned activities in 2023-24

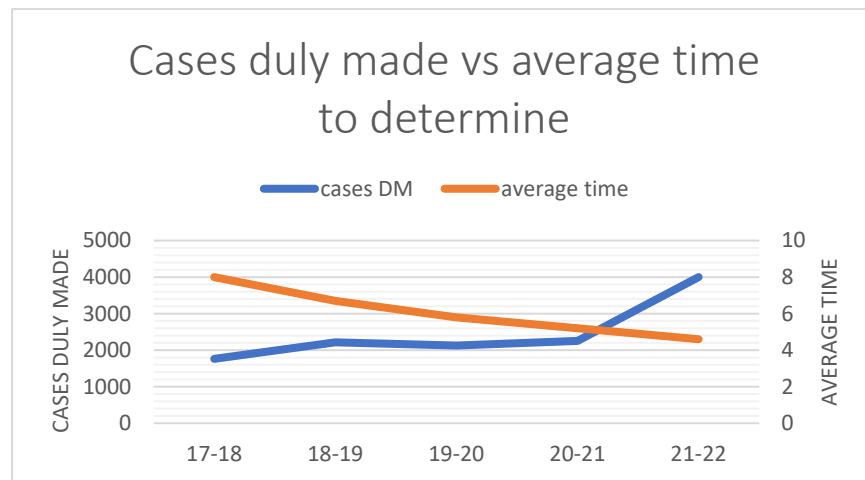
- Our strategic intelligence-led approach to Dispute Support will shift our resident support to much earlier in our process and empower them to take forward their complaint by increasing the volume of tools and guidance on our website. Our support work will be incorporated into the development of our wider duty to monitor compliance against our Complaint Handling Code which we will expect to commence on 1 April 2024. The aim of the support will be to help improve local complaint handling for the benefit of all residents and we will trial this during the year. We will also test advocacy and advice agencies' appetite for regular training from us so their staff can support social housing residents more effectively.
- Our Centre for Learning will begin to take shape with a greater number and range of learning tools available to members via our website. This will be complemented through established partnerships with sector organisations to deliver training and learning opportunities through digital and face-to-face means, providing members with opportunities to share experiences and best practice. We will also host an event for those holding the 'Member Responsible for Complaints' role under the Complaint Handling Code and consider if this should be an annual event.
- Our programme on awareness raising will have a particular focus on understanding the barriers faced by residents in accessing our service directly. This will include targeting groups that use our service less frequently, and increasing the understanding of our role and the difference complaints can make. We will also continue to raise awareness with key stakeholder groups through regular communications and briefings, and with residents through our 'Meet the Ombudsman' visits as well as promoting a wider understanding of our role.
- Our employer brand programme will strengthen our employer value proposition and, in doing so, deliver an internal virtual academy for staff to support their learning and development, and develop an apprenticeship programme. We will implement more of our CSR strategy through community engagement and volunteering, and grow our diverse workforce as outlined in our EDI strategy.
- Our digital programme will see the further roll-out of our online complaint handling portal, improve our analytical capabilities and the presentation of information internally and externally.

Performance to date, KPIs and fees in 2023-24

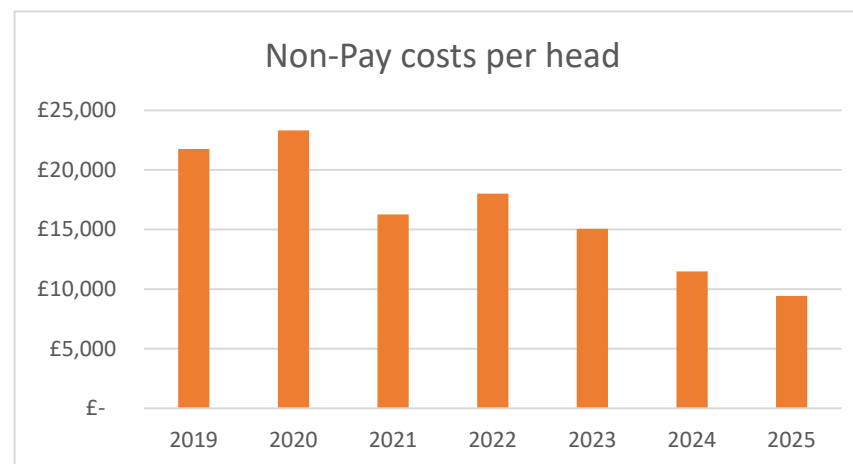
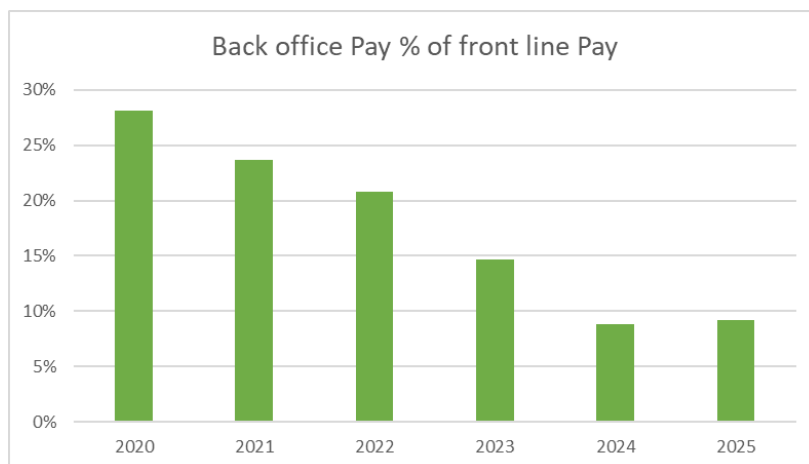
Performance

Our service has delivered value for money over the last five years:

On timeliness: We have continued to bring down average determination times, despite year-on-year increases in demand and an increasingly unstable external operating environment.



On costs: We have also delivered efficiency savings by reducing overheads, enhancements to internal processes, use of digital solutions and a targeted approach to delivering value for money.



Key performance indicators and fees

The unprecedented 2021-22 surge in complaints has made social housing a high complaints sector, averaging nine Ombudsman complaints per ten thousand households for that year. This is considerably higher than the Local Government and Social Care Ombudsman and just short of the Parliamentary and Health Service Ombudsman. The removal of the Designated Person requirements at the start of October created an expected surge in incoming volumes, compounded by further increases following the publication of the coroner's report on the tragic death of Awaab Ishak. We anticipate significant increases in demand during 2023-24 due to on-going media coverage, further increases in demand on our service during the second half of 2022-23 and government awareness raising campaigns.

We responded to the 2021-22 surge with an aggressive expansion programme and this will continue into 2023-24, growing us from just under 120 FTE staff in 2021-22 to over 416 in 2023-24. To reflect the impact of our transition to a much larger organisation, the lead time to recruit and retain effective caseworkers and the consequences of moving from a purely age-based allocation model to one that includes case sensitivity, our timeliness KPI targets have been adjusted to achieving 95% of cases determined within six months and 99% of cases determined within 12 months by the end of 2024-25. We expect to start meeting these timescales in the second half of 2023-24.

Expected demand drives the resources we need to deliver a timely service and, hence, the subscription fee - of the total pay budget for 2023-24, nearly 85% is budgeted for casework roles. As demand is expected to significantly exceed the previous forecast of 30%, the chargeable fee for 2023-24 will increase to £5.75 per home with a total budget equivalent to £6.75 per home, after applying the carried forward surplus.

We recognise this is above the fee ceiling of £5.30, but the current circumstances are exceptional. We want to be prepared for higher demand and significantly reduce waiting times for legacy cases in 2023-24; the higher fee will allow us to do both of these things.

Strategic Objective 1: Extending fairness

Strategic priorities and outcomes	Year two deliverables (2023-24)	Key performance indicators
1.1. Strategic, intelligence-led approach to dispute support - Targeted landlord support to improve complaint handling for all residents - Residents and landlords are empowered to resolve complaints earlier and locally	- Test partners' appetite for support to improve their advocacy and advice services - Enhance our enquiries service to provide more support up-front to help residents to resolve their complaint - Trial support work to improve landlords' complaint handling where there is evidence the landlord's complaint handling has failed - Plan for our future outsourced enquiries service	60% of residents are satisfied with the service provided at dispute support - Baseline the impact of strategic interventions
1.2. Strengthening the framework for the Ombudsman investigations - Where appropriate, findings from individual cases benefit all residents - Restoring the landlord-resident relationship through appropriate redress - Remedies, orders and recommendations have an impact on landlord services	- Complete the deep dive reviews of our policies and guidance documents covering remedies, and orders & recommendations - Deliver alternative routes to dispute resolution - Begin to implement our approach to specialisms and subject matter experts - Quality Board is recruited and meetings are held	80% of residents whose complaint was upheld were satisfied with the service provided 50% of the residents whose complaint was not upheld were satisfied with the service provided 98% compliance with orders within 3 months 100% compliance with orders within 6 months

Strategic priorities and outcomes	Year two deliverables (2023-24)	Key performance indicators
• Our inquisitorial approach is enhanced through specialisms • Quality Board with external members provides assurance over our approach		• 95% of quality assurance reviews find casework was acceptable or better • 95% of cases are decided within six months by 2024-25 • 99% of cases are decided within 12 months by 2024-25
1.3. Enhanced thematic insights and systemic investigations • Our Spotlight reports build a picture of the quality of residents' homes • We undertake systemic investigations where we identify serious or repeated complaint handling failure • We are responsive to other issues or themes as they arise	• Review and publish our updated systemic framework • Develop the use of Type 3 CHFOs • Develop and implement the approach to monitoring previous Spotlight reports • Build and maintain our relationships with regulators and other Ombudsman schemes • Where a paragraph 49 investigation is initiated, complete and publish the final report within 10 months	• Publish at least two Spotlight reports • Publish four Insight Reports
1.4. Supporting the review into extending our powers • We have a picture of where increased powers would benefit residents	• N/A - Delivered	

Strategic priorities and outcomes	Year two deliverables (2023-24)	Key performance indicators
1.5. Growing our membership and closing gaps in redress • Strategic expansion of voluntary members • Inform government policy to reduce housing redress complexity and close gaps for residents	• Continue to engage with government to discuss the future of redress in the housing market • Subject to legislation, agree the statutory MoU with the Regulator of Social Housing • Agree a MoU with the Building Safety Regulator • Finalise and publish a MoU with the New Homes Ombudsman	

Strategic Objective 2: Encouraging learning

Strategic priorities and outcomes	Year two deliverables (2023-24)	Key performance indicators
2.1. Establish a Centre for Learning Improving the sector's complaint handling through an integrated offer, differentiated by role and landlord type	- Engage with members to establish their learning needs and preferences - Start to build the Centre for Learning - Continue to deliver learning content, diversified by audience and landlord type - Consider how to most effectively invite stakeholders to propose topics for systemic investigation	- Baseline the impact of activities to support landlord learning - Increase the level of landlord engagement with our learning tools over this corporate plan period compared to the previous period
2.2. Driving a positive complaints culture - Landlords and residents can understand each member's performance based on the complaints we have investigated - Landlord governing bodies are better able to hold their organisation to account for its complaints handling - Landlords are aware of current and future complaints handling challenges - Landlords have insight into groups or complaint types that may face	- Write to all landlords with high maladministration rates and monitor their response - Publish the Annual Complaints Review by September 2023 - Hold an event dedicated to supporting the Member Responsible for Complaints role - Subject to legislation, consult on a statutory Complaint Handling Code - Design our approach to monitoring Code compliance and test with stakeholders	KPI to be developed during 2023-24 to measure the impact/outcome of the duty to monitor

Strategic priorities and outcomes	Year two deliverables (2023-24)	Key performance indicators
barriers in accessing or progressing complaints through their procedure		

Strategic Objective 3: Increasing openness

Strategic priorities and outcomes	Year two deliverables (2023-24)	Key performance indicators
3.1. Raise awareness of our service, build understanding • More residents are aware of our service and understand the benefits of alternative dispute resolution • Improved access to the Ombudsman amongst groups that have not used our service in the past	• Undertake targeted work to raise awareness with resident demographic and geographic groups that are not accessing our service as much as others • Publish the conclusions of the Accessibility Expert Panel • Develop the 'Meet the Ombudsman' model and hold at least four events around England	• Baseline awareness of the Ombudsman and the impact of awareness raising activities
3.2. Work collaboratively with partner organisations • Improved signposting to our service	• Improve signposting between housing-related Ombudsman schemes	
3.3. Prepare for go-live of the Access to Information Scheme appeals service • Appeals under the Access to Information Scheme are delivered on time and in a fair way	• Continue to work with DLUHC and plan the implementation of the Access to Information Scheme appeals service	

Strategic Objective 4: Achieving excellence

Strategic priorities and outcomes	Year two deliverables (2023-24)	Key performance indicators
4.1. Develop our employer brand - We are accredited as a top 100 place to work and regarded as a socially responsible, diverse and inclusive employer - We are an employer of choice - Colleagues are positive about their learning and development opportunities and take advantage of these	- Deliver an integrated people programme for all staff - Start to recruit apprentices - Implement our CSR strategy - Expand our EDI programme - Set out our employer value proposition	100% of staff have received people programme training
4.2. Continue our digitisation journey - We have a fully digital complaint handling channel for landlords and residents - Our back-office systems are more efficient and effective - Our digital office supports effective hybrid working	Further roll out of the online complaint handling portal, and plan for extension to residents	Engage every landlord in receipt of a landlord performance report with onboarding to the portal