

Quarter 3 2024/25 Feedback Data

Local authorities that provide social housing, such as the Council, are subject to compulsory registration with the Regulator of Social Housing under section 114A of the Housing and Regeneration Act 2008. All registered providers of social housing are required to comply with the Regulatory Framework for Social Housing. Within the Regulatory Framework, the Tenant Involvement & Empowerment Standard contains specific expectations for registered providers in relation to complaints, requiring that they:

- Have an approach to complaints that is clear, simple, and accessible that ensures that complaints are resolved promptly, politely, and fairly.
- Offer a range of ways for tenants to express a complaint and set out clear service standards for responding to complaints, including complaints about performance against the standards, and details of what to do if they are unhappy with the outcome of a complaint.
- Inform tenants how they use complaints to improve their services.
- Publish information about complaints each year, including their number and nature, and the outcome of complaints; and
- Accept complaints made by advocates authorised to act on a tenant's/tenants' behalf.

All providers registered with the Regulator for Social Housing must be in the Ombudsman's jurisdiction by effect of the 1996 Housing Act and 2011 Localism Act. Housing Ombudsman members must comply with mandatory requirements and should comply with best practice requirements in the Complaint Handling Code, which encompasses and expands upon the regulatory requirements. Failure to comply with the Complaint Handling Code may result in the Ombudsman issuing a Complaint Handling Failure Order and/or breaching the Regulatory Standards.

The Social Housing (Regulation) Act 2023 (the Act) places the Complaints Handling Code (the Code) onto a statutory footing. It also puts a duty on The Housing Ombudsman Service (HO) to monitor compliance with the Code, as well as granting a number of additional powers. The code was revised with effect from 1 April 2024, introducing a deadline for submission of self-assessment against it of 30 June 2024, with opportunity to update that submission during the financial year.

The Local Government and Social Care Ombudsman have issued the Code under their powers to provide "guidance about good administrative practice" to organisations under section 23(12A) of the Local Government Act 1974. For the Local Government and Social Care Ombudsman this Code constitutes important advice and guidance to councils, rather than instructions.

They can recommend an organisation takes action to improve services or provide a personal remedy where it finds fault causing injustice to an individual or group of individuals. Unlike the Housing Ombudsman, they have no specific responsibility for monitoring compliance with the Code in addition to their role investigating complaints of maladministration and service failure

Complaints

Introduction and overview

1. The recent implementation of aligned complaint handling codes by both the Housing Ombudsman and the Local Government and Social Care Ombudsman has highlighted the need to improve complaint management across the Council. This report provides an overview of Quarter 3 complaint data, identifies key issues, and outlines corrective actions. The following report is based on complaints and escalated complaints received in quarter 3 of 2024/25

Key Metrics		Q1 performance	Q2 performance	Q3 performance
KP085	Number of complaints received per 10,000 population	7.02	6.35	6.27
KP086	% of complaints responded to within required period	71.11% ¹	75.26% ²	85.26%

- 1.1. KP085 uses a population of 119,709 in its calculation (estimate from data mid 2022) and a total number of complaints received as
 - 84 (82 at stage 1, 2 direct to stage 2) in quarter 1,
 - 76 in quarter 2 and
 - 75 in quarter 3 (74 at stage 1, 1 direct to stage 2)
- 1.2. KP086 includes both stage 1 and stage 2 data.
- 1.3. While number of the number of complaints remains relatively consistent across the quarters, it is pleasing to see an improvement in responses being completed within the required timescales, which speak to the commitment of the officers involved to focus their attention on complaints, recognising the importance of timely investigation and a commitment to embedding it into the Council's culture.
- 1.4. In total for quarter 3, 83 stage 1 complaints were due to have a response sent, with 69 being done within permitted timescales. 12 stage 2 complaints were due to have a response sent and all were completed in time. Of those that were not completed in time, the delay was rarely more than 1 or 2 working days, however this still requires improvement and work continues with officers and managers to ensure a seamless hand over of investigation and sign off in a timely manner.

¹ This was previously reported incorreccted as 76.84% due to an error in the methodology of the calculation

² This was previously reported incorrectly as 72.34% due to an error in the methodology of the calculation

Stage 1 and stage 2 complaints

2. The Council has a 2-stage internal complaint policy, which ultimately gives the complainant the right to escalate their complaint to one of two Ombudsmen, depending on the nature of their complaint. 74 stage 1 complaints were received in Q3 2024/25, an 80% increase from Q3 2023/24 and 13 complaints were escalated to stage 2.
 - 2.1. Reason for these increases continue to stem from increased awareness of the complaints process, both with customers and with colleagues, which is driven by the requirement to have an accessible and transparent process. Data from last year is not necessarily comparable because of this and it will need to be monitored in 2025/26 in order to make any meaningful analysis.
3. Of the 74 stage 1 complaints received in quarter 3, 32 separate stage 1 complaints implicated the Council's landlord function - equating to 24.74 stage 1 complaints per 1000 council homes. In the main, these related to matters such as communication, timely repairs and cancelled/missed appointments.
 - 3.1. The Council has seen an increase in the number of cancelled/missed repairs appointments by Ian Williams in its complaints regarding the repairs service. In quarter 3, there were 5 Stage 1 complaints regarding Ian Williams cancelling or missing prebooked repairs appointments – this is a 400% increase from quarter 2. This is being monitored through quarter 4 and if this theme continues, work will commence to address this and will be reflected in the quarter 4 report.
 - 3.2. The next highest percentage is 23% (17 complaints) relating to the car park machines in Council-owned car parks. The complaints concerned issues customers were facing with both the contactless and cash payment methods on the machines. All of these complaints were upheld, and the Council admitted its service failure and the impact these issues were having on its residents.
 - 3.2.1. As of 16 December 2024, customers can now pay for parking using their mobile phone through the APCOA Connect app. The Complaints team will keep abreast of how this app affects the levels of complaints the Council is receiving about its car parks and this will be reviewed as part of the quarter 4 report.
 - 3.3. 9.5% (7 complaints) related to the Housing Options service often in relation to lack of communication, and delays in housing applications; for context there are currently 2855 active applications on the housing register, so this number of complaints equates to 0.5 complaints for every 100 applications.
 - 3.3.1. It's also worth noting that whilst there is an increase in Housing Options complaints compared to previous years relating to delays and lack of

communication, there have been less applications received this year than annually in the previous two years.

3.3.2. So far in 2024/25, we have received 8 complaints implicating Housing Options – 7 of those being in quarter 3 alone. This is an increase of 60% compared to the first three quarters of last year. Despite the decrease in housing applications, an increase in complaints regarding delays and communication issues suggests a potential resource or training issue which is being explored by the Housing Services Manager and the Housing Options Manager. This will continue to be tracked through quarter 4, with an update provided in a future report.

4. Of the 13 stage 2 complaints received over quarter 3, 8 related to the council’s landlord function, where the customers raised concerns about communication failures, delayed repairs and the failure to complete promised actions. 5 related to the Councils non-landlord services where the customers raised concerns about communication and service delivery failures as well as concerns around procedures and customer service.

4.1. This is a decrease on both quarter 2 of 2024/25 (18 stage 2 complaints) and quarter 3 of 2023/24 (17 stage 2 complaints) and reflects on the work being undertaken to track delivery of stage 1 actions.

5. A customer does not have to provide a reason if they want to escalate their complaint and must go through the Council’s internal process for either Ombudsman to investigate their complaint. However, residents who are complaining about the Council’s landlord function can approach the Housing Ombudsman for support and guidance at any time. It’s worth noting that out of the 13 complaints that escalated to Stage 2, 8 had been upheld at Stage 1. Often this was because some residents were still dissatisfied with the resolution and chose to escalate their complaints further.

6. The Council is able to benchmark some of its data against data provided by Housemark – “the leading data and insight company for the UK housing sector”³. *In total across stage 1 and 2 combined*, the landlord function received

complaints per 1000 homes			
	NKDC	Nationally: Other LA's and ALMOS's[1] – average	Small Local Authorities - average
Q1			
April	4.38	4.84	3.75
May	6.18	5.1	3.64
June	3.61	4.67	3.02
Q2			
July	8.5	5	4.21
August	3.6	4.61	3.6

³ [Home - Housemark](#)

September	4.1	4.45	3.82
Q3			
October	3.87	4.65	4.37
November	3.87	5.32	4.22
December	2.32	4.12	3.66

6.1. There is no benchmarking data that allows a further breakdown; however, this does provide useful perspective on complaint volumes with comparable landlords

Complaint outcomes

7. While numbers of complaints are important to understand the level of overall dissatisfaction and the workload that must go in to investigating complaints, high numbers of complaints alone should not be considered as a negative indicator. Residents should know how to make a complaint and do so without obstructions – high complaint numbers can be an indicator of an open and transparent council who are listening to resident’s needs.
8. A key indicator of performance and quality service delivery however is how many complaints are upheld and how many escalate, both through the internal process and to the Ombudsmen. Complaints can be multifaceted, and there may be some elements of an individual complaint that is not upheld, while other elements are upheld – and ultimately this means the whole complaint is recorded as being upheld.

Stage 1 complaint outcomes for quarter 3

9. 66.6% of non-landlord function complaints were upheld (28 of 42 complaints)
 - 9.1. 62.5% of landlord function complaints were upheld (20 of 32 complaints).
 - 9.2. Overall, 64.9% of complaints were upheld (48 of 74 complaints) across quarter 3 of 2024/25

Stage 2 complaint outcomes for quarter 3

10. 80% of non-landlord function were upheld at stage 2 (4 of 5). All 5 escalated because the customer was unhappy with the stage 1 response
 - 10.1. 2 had been not upheld at stage 1 – one continued to be not upheld at stage 2 and one was upheld.
 - 10.1.1. The complaint which continued to not be upheld related to the Market Place Reopening Fund where it was agreed at Stage 1 and 2 that the Council had acted in accordance with its internal procedures and evidenced it is continuing to support Market Place businesses as the Market Place opens.

10.1.2. The complaint which changed from not upheld to upheld related to the Housing Options service where further investigation found that the customer had not been advised in a timely manner as to what information was required for their housing application and documentation which had been provided was missed from the initial assessment of their application. Despite this, the outcome of the application would have been the same if these issues had not occurred. £100 was offered due to the unacceptable delays sustained.

10.2. 3 had been upheld but the customer was not satisfied with the remedy offered

10.2.1. One complaint related to the HUG2 funding scheme – whilst the complaint continued to be upheld as per the Stage 1 response regarding installation issues, it was confirmed that the storage heaters installed were as per the signed specification so the customer's request for the original storage heaters to be reinstalled could not be fulfilled under the scheme.

10.2.2. The second related to the noted issues with car park machines across quarter 3. The customer escalated because they did not feel the Council was acting quickly enough to resolve the problem (which the Stage 2 investigation agreed with). The response noted the significant amount of time taken to implement the payment app to rectify these issues but confirmed that works were ongoing – the app is now available.

10.2.3. The other complaint related to the Shared Revenues & Benefits service and was escalated because the customer felt the Stage 1 response dismissed the issues they raised regarding reasonable adjustments and officer call handling. The complaint continued to be upheld and £150 was offered to acknowledge the distress caused. This complaint has highlighted the need for the Council to have a set approach to dealing with reasonable adjustments and vulnerabilities as there is a gap in officer understanding as to the Council's responsibilities under the Equality Act 2010. As a result, the Customer Engagement Manager is developing a Vulnerable Customers and Reasonable Adjustments Policy.

11. 62.5% of landlord function complaints were upheld at stage 2 (5 of 8).

11.1. 7 of the 8 complaints were escalations

11.1.1. 1 was taken straight to stage 2 because the customer had already engaged with the service about the matter via an Anti-Social Behaviour Case Review. Stage 2 allowed for a completely objective investigation, independent of the service. It was not upheld as the Council could evidence it has acted in line with its policies, processes and procedures.

11.2. Three of the stage 2 complaints which were upheld implicated Property Services – Responsive Repairs. They were escalated to stage 2 (including one which was upheld at Stage 1) because, the promised remedies were not delivered or were taking too long to deliver and the customer was not provided timely updates as to progress.

11.2.1. Whilst two of these three were not upheld at stage 1; were all three were upheld at stage 2 because of this failure to deliver on promised actions. No further financial remedies were offered at Stage 2, but reminders and recommendations were made to the service:

- Officers were reminded about the importance of taking contemporaneous notes when discussing repairs on the phone with customers
- Recommendation to discuss with Ian Williams how they handle out of hours enquiries and communicate with customers about appointments.

11.2.2. An increase in the number of Stage 1 complaints regarding Ian Williams missing or cancelling appointments has been noted and the Complaints team will continue to monitor these types of complaints. An update will be provided in quarter 4 reporting.

11.3. Three of the escalated complaints implicated Neighbourhoods Service. Two of these three were not upheld at stage 2 because the Council has responded effectively and acted in line with its policies and procedures. However, one was upheld because the Council failed to ensure it properly supported a temporary tenant in the transition to permanent accommodation – it is noted that this is due to a lack of guidance in the current process which has been recommended for a review.

11.4. Finally, one complaint related to adaptation works to a tenant's property. The complaint continued to be upheld as set out in the Stage 1 response regarding lack of communication and delayed actions, but further elements raised at Stage 2 were not upheld. No further remedies were offered.

12. Overall, 69.2% of stage 2 complaints were upheld (9 of 13)

13. While there are no notable themes emerging from non-landlord complaints, those complaints upheld for the Council's landlord service consistently relate to inadequate record keeping & poor communication, which was also the case in quarter 1 and 2. In those complaints relating to repairs, the outcomes also highlight a failure to manage the customers repairs journey with the contractor.

13.1. The Customer Engagement Manager has been seconded to Housing and Property Services since the beginning of October and is working with Service Managers in the division to identify any perceived

barriers to effective record keeping and communication, as well as working to share and embed learning from complaints more effectively so that lessons can be learned and service delivery improved.

Response Delays

14. The Council's policy (in line with the requirements of the Ombudsman) requires that stage 1 complaints are investigated within 10 days of them formally being acknowledged, though an additional 10-day extension is permitted, as long as this is communicated to the customer. This extension was being applied consistently on quarter 2 due to resource issues.

14.1. From November 2024, following the vacant posts within Property Services being filled, the Council resumed its usual practice of allocating stage 1 complaints about the landlord function to 10 working days.

14.2. 18 of the 30 stage 1 complaints relating to Property Services were allocated 10 working days to respond. 5 of those 18 required a subsequent extension whilst investigation was underway to account for the level of investigation required. Customers were informed where the decision to extend the deadline had been made.

15.6 of those 30 complaints were closed outside of permitted timescales (which includes agreed extension times) which is an improvement on the numbers of complaints closed outside permitted timescales in quarter 1 and 2, as demonstrated in the table below

Stage 1 and Stage 2 complaints resolved within timescale (%) (all landlord service)			
	NKDC	Nationally: Other LA's and ALMOS's- average	Small Local Authorities - average
Q1			
April	71.1	90.1	84.51
May	23	88.24	77.27
June	68	92.00	83
Q2			
July	77.2	90.5	77.72
August	77.27	92.11	82.35
September	55.16	95.96	84.58
Q3			
October	75.00	80.00	86.67
November	83.30	90.00	80.00
December	75.00	93.33	87.50

15.1. There is no dedicated resource for complaint investigations within HPS (or any other division). Investigations are usually allocated to the manager for the area the complaint is about however as described above,

now the post of Repairs & Planned Maintenance Manager has been filled, the team have the support to complete complaint investigations in a timelier manner while also dealing with daily operational tasks. Work continues to see further improvements in these response times.

Remedies

16. It is not always necessary to provide financial remedies, the primary objective of the outcome of any upheld complaint is first to provide an apology and then to take action to return the complainant to the position they would have been in, had the service failure not occurred. However, on occasion, the injustice suffered by the complainant cannot be ‘undone’ – this is often where the injustice has occurred as a result of poor record keeping, communication or timeliness. Sometimes, the customer has incurred a financial cost as a result of council failings, in these instances, it is often appropriate to provide a financial remedy to acknowledge this. It is easier when there is financial loss as this can be quantified, however sometimes a figure must be identified for something less tangible. This is currently done using guidelines that the LGSCO provide and ongoing monitoring for consistency. The Customer Engagement Manager is currently working on a protocol for remedy delivery which will also include a clear structure for allocation for financial remedies.

16.1. It’s important to note that there no funds allocated for financial remedies in individual budget lines across the organisation. The cost of this is borne by either the General Fund or the Housing Revenue Fund depending on what area the complaint is about. In relation to landlord complaints where there has been failure by a contractor this is not recharged to the contractor as this has not been built into the contractor agreement.

Stage	Amount offered across number of complaints (complaint received in previous quarter but completed investigation in Q3)		Amount offered across number of complaints (complaint received & investigation completed in Q3)		Total Offered in Q3	Total paid in Q3 (due to customers declining payment)
	Amount	Number	Amount	Number		
Stage 1	£275	3	£598	5	£873	£873
Stage 2	-	-	£250	2	£250	£250
Ombudsman	£50	1	£1,900	1	£1,950	£1,950
Total	£325	4	£2,748	8	£3,073	£3,073

Ombudsman investigations

17. In quarter 3 of 2024/25, the Housing Ombudsman completed 1 investigation into a complaint about the repairs service which it upheld. This complaint was investigated by the council in June 2023 (Stage 1) and July 2023 (Stage 2) and was not upheld both times.

17.1. The Housing Ombudsman's investigation decision is critical of the Council's handling of the customer's case and subsequent complaint and, the Council was ordered to apologise, pay financial remedies totalling £1,900 and refund the resident for associated costs which were accrued during the time the works were underway. It was also ordered to carry out a Senior Management review of the case to understand why it was unable to fulfil its obligations under the Equality Act 2010 nor consider the resident's disability in its decision making.

17.2. An apology has been sent to the customer and the compensation has been paid. The Senior Management review is currently underway, and the outcome will be shared with the Member Responsible for complaints to provide assurance that the Ombudsman's findings have been carefully considered and are creating meaningful change.

17.3. As part of the review, following the Ombudsman's recommendation and in reflection of the earlier mentioned stage 2 complaint investigation for a Council Tax complaint, the Customer Engagement Manager is developing a Vulnerable Customers and Reasonable Adjustments Policy. This policy will come to Executive Board for approval in a future report and will be a Council wide policy.

18. In quarter 3, the Housing Ombudsman commenced its first contact with the Council into a complaint about the council's planned maintenance service. Including the investigations which have already commenced in the previous financial year and first two quarters of 2024/25, this makes a total of 9 complaints about NKDC's landlord function currently at triage or under investigation with the Housing Ombudsman.

19. In quarter 3, Local Government & Social Care Ombudsman decided not to investigate a complaint made to them about other Council services as investigation could not be justified on the evidence provided to them by the complainant.

LGSCO Complaints code pilot

20. While the Housing Ombudsman's code became statutory from April 2024, the Local Government & Social Care Ombudsman code is not statutory and is currently in a pilot phase. Following agreement from Executive Board, North Kesteven District Council volunteered to be part of the pilot for the next 2 financial years before it is rolled out as best practice to other local authorities. As a participating Council, the Customer Engagement Manager and the

Complaints officer meet regularly with others and the LGSCO to explore the internal impacts of the code and sharing experiences of how these impacts can be mitigated, as well as having the opportunity to contribute to procedures and guidance being developed by the LGSCO.

20.1. Following approval by Executive Board on 09 January 2025, the Customer Feedback Policy has been updated to ensure it is in line with both the Housing Ombudsman and LGSCO complaint handling codes. The changes mean the Council now has to adhere to new timescales in acknowledging and responding to complaints and cements the new roles of Complaints Officer and Member Responsible for Complaints.

20.2. In addition to this, the Customer Engagement Manager and Complaints Officer are currently rolling out in person training sessions for all public facing colleagues and all colleagues will receive e-learning on the policy which includes a quiz at the end to test understanding. Training for investigating officers is currently at planning stage and will be rolled out to the relevant colleagues over the coming months.

20.3. Benchmarking performance indicators are being discussed and so comparative data may be available in the future for non-landlord functions

Service Requests and comments

21. In quarter 3, 83 contacts were received by the Complaints team that, after triage are identified as not being a complaint in line with the policy. These are either categorised as 'service requests' or 'comments'.

21.1. Service requests are passed to the service to respond to as this is the first time the customer has made contact about the issue they are raising, and it is not 'dissatisfaction' about the Council or its services in the first instance. However, a record is kept by the Complaints team so that if the matter escalates to 'dissatisfaction' it can be re-considered as a complaint.

21.1.1. 2 out of 79 services requests (2.53%) from quarter 3 escalated to a Stage 1 complaint because the service failed to action the request, and the customer returned to the complaints team expressing dissatisfaction regarding this.

21.1.2. However, this may not be an entirely accurate representation of the number of service requests which *could have* escalated to a Stage 1 complaint in 2024/25 to date as this data has not yet been collated retrospectively. Service requests received in 2023/24 may have escalated to a complaint within Q1-3 2024/25, but the data is not currently available to confirm or deny this.

21.1.3. NKDC also received 21 requests for services delivered by other authorities – 15 of which concerned issues which Lincolnshire County Council are responsible for e.g., nuisance parking, road maintenance

including potholes, Sleaford Recycling Centre. This highlights the public's perception of local government and the misconceptions surrounding what different levels of local government are responsible for.

21.2. A contact is categorised as a comment when the customer is complaining about an action by the Council, but that action has been taken in line with an approved Council policy. These contacts are shared with the services manager and Assistant Director and a formal response is sent to the customer acknowledging their dissatisfaction and noting that their feedback will be filed and considered in the future when the policy is reviewed.

21.2.1. 4 formal comments were logged and responded to in quarter 3.

21.2.2. 3 of the 4 related to a historic Council policy, where new build properties were provided with smaller refuse bins and larger recycling bins than standard. While this policy is not current, it has left a legacy of properties with this bin combination. The current policy is that those homes may be entitled to a larger bin if they meet certain criteria. A review of NKDC bin policies is being proposed as part of a wider programme of responses to the proposed HM Government waste collection reforms.

21.2.3. The other comment related to a rejected bin due to thin plastic contamination highlighting the misconceptions the public have regarding the recyclable materials that NKDC collect.

Compliments

22. Compliments are also received and registered to ensure there is balance in reflecting on the services we deliver to the public. Though not overseen by the Ombudsman, it is still important to recognise the value of positive feedback and learn from those positive customer experiences – so that the Council can see to replicate them. In quarter 3, the Council received 56 compliments.

22.1. Compliments are more than just 'thank you' – they are examples of when a customer has taken the time to feedback to the Council on where they feel the level of service, they have received was of a higher standard that they might have expected or experienced elsewhere. These often highlight quick and efficient service, high quality service delivery or examples of officers going 'above and beyond'.

22.2. While these compliments are often collated organically through direct telephone calls and web transactions, the Council have recently started to collate positive reviews left through Trip Advisor, Google reviews and Trustpilot for its tourism venues and leisure services. This resulted in 86 compliments for the Economic Development service in the first 9 months of 2024/25, reflecting on the quality of the experiences offered.

22.2.1. Waste & Street continue to receive the highest volume of organically received compliments (14 in quarter 3), acknowledging the

high standard of service being delivered face to face to every household in the district and the efforts of individual crew member showing pride in their roles and high levels of customer service.