### LONDON BOROUGH OF CAMDEN

WARDS: All

**REPORT TITLE:** Risk Deep-Dive – Complaints in Property Management

**REPORT OF:** Director of Property Management

#### FOR SUBMISSION TO:

DATE:

Audit and Corporate Governance Committee

27th November 2025

#### **SUMMARY OF REPORT**

This report provides Members with an overview of the Complaints in Property Management principal risk to enhance the Committee's understanding of how this risk is being managed. The purpose of the risk deep-dive is to enable the Committee to fulfil its duties regarding monitoring the Council's effective operation of risk management as set out in its Terms of Reference.

#### Local Government Act 1972 - Access to Information

No documents that require listing were used in the production of this report.

#### **Contact Officer:**

Scot Reid Head of Housing Property Engagement and Customer Services 5 Pancras Square London N1C 4AG

020 7974 6303

Scot.reid@camden.gov.uk

#### **RECOMMENDATIONS**

That the committee note how this risk is being managed.

Signed:

Gavin Haynes - Director of Property Management

Date: 14/11/2025

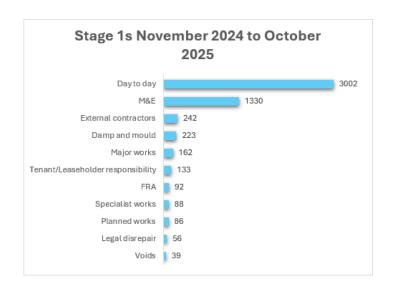
## 1 Purpose of the report

- 1.1 In accordance with its Terms of Reference, the Audit and Corporate Governance Committee (the Committee) is required to monitor the Council's effective development and operation of risk management. In addition to this, the CIPFA position statement on Audit Committees in Local Authorities specifies a number of core responsibilities for audit committees, one of which is to "consider the effectiveness of the authority's risk management arrangements and the control environment."
- 1.2 The purpose of the risk deep dive is for the Committee to obtain a deeper understanding of the chosen risk area and develop insight into the risk controls and action plan.
- 1.3 The Principal Risk information and action plan for Complaints in Property Management is listed as Appendix 1 (see below)

#### 2 Current Risk Context

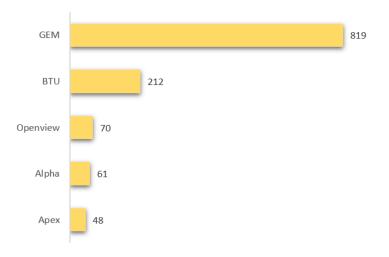
- 2.1 The number of complaints regarding Property Management has been consistently rising. This trend, while in line with patterns observed among other local authorities across London, necessitates a proactive and considered response from our organisation. We must adhere strictly to the guidelines articulated in the Housing Ombudsman's complaint handling code to ensure that every complaint is managed professionally and diligently. The Housing Ombudsman has published the code on its website, and this can be accessed here The Complaint Handling Code | Housing Ombudsman Service
- 2.2 In November 2023, the Council was notified by the Housing Ombudsman that they would be carrying out a "Paragraph 49" investigation into the Council's handling of leaks, damp and mould, complaints and repairs. This investigation was in keeping with wider work by the Ombudsman, who has carried out similar investigations across London with ten reports published in recent years for London local authorities (Islington, Haringey, Hammersmith & Fulham, Lambeth twice, and Camden) or large London Housing Associations (including large providers such as L&Q, Clarion, Hyde and Southern).
- 2.3 The report identified three themes of concern: Complaint handling, Property condition and repair and Vulnerable residents. Housing Ombudsman recommendations in relation to complaint handling are summarised below:
  - The Council should review processes and training to align with the statutory Complaint Handling Code to foster a culture that values complaint handling and removes any perceived defensiveness
  - The Council should enhance its processes for complaint identification, acknowledgement, and investigation.

- Introducing consistent and transparent guidance on compensation and improved data accuracy in complaint recording and performance reporting were also recommended.
- 2.4 In addition to ensuring proper handling of complaints, we must prioritise the extraction of insights from these feedback instances. By conducting a comprehensive analysis of the nature and frequency of the complaints received, we can identify common themes and underlying issues that may be contributing to this upward trajectory. Our objective should not only encompass addressing individual complaints but also implementing systematic changes that will enhance our overall service delivery.
- 2.5 It is vital that we demonstrate to our residents that their concerns are taken seriously and that we are fully committed to continuous improvement. By actively engaging with our residents and maintaining open lines of communication, we can reassure them that we are dedicated to resolving their issues effectively and responsibly. Ultimately, our ability to learn from these complaints will empower us to reduce their frequency over time, thereby enhancing resident satisfaction and fostering greater trust in our Property Management services.
- 2.6 Each year, we conduct approximately 150,000 repairs and services across the housing stock. Additionally, we handle around 275,000 resident interactions through our Housing Repairs Contact Centre. Activity has also been increased in recent years as the Council delivers some fire safety works through its repair team and it has proactively sought to engage with residents to resolve damp and mould issues. During these interactions, customer dissatisfaction may arise at any point if we fail to provide a satisfactory customer experience.
- 2.7 Most of the stage 1 complaints listed below involve our day-to-day repairs team and internal repairs, this is not unexpected as repairs inside the home can cause significant inconvenience, particular issues such as leaks from above. It is also noted that due to the extreme cost pressures on the Housing Revenue Account we have had to extend our repair timescales and this means that residents are waiting longer for non-emergency repairs to be completed. The Council is also being stricter with its focus on landlord responsibilities and this means that very little discretionary work is being done. The final factor to consider is the need for additional investment in the housing stock and infrastructure such as communal heating. To address this, the Council approved its Housing Investment Strategy in January 2025 which will see £670m of works commissioned in the next five years.
- 2.8 Below is a breakdown of the stage 1 complaints by area.



A further breakdown of stage 1 complaints per Contractor





- 2.9 It is noted below that of the Council's contractors, GEM receive the most complaints. GEM deliver repairs and planned maintenance to the Council's 200 communal heating networks, covering over 14,000 homes. These networks vary greatly in age and condition, and some are very difficult to maintain and need to be replaced, for example Rowley Way (Alexandra and Ainsworth estate). The Council is therefore prioritising investment in the larger systems and is also completing upgrades to a range of boiler plant rooms. Large system replacements currently being procured include Rowley Way, Maiden Lane and Mayford. Recent schemes that have been significantly progressed or completed include the new systems at the St. Silas estate and Weedington Road.
- 2.10 The Council is also currently procuring new contracts for its M&E services, and new contractors will be appointed for communal heating, lifts, electrical works,

gas supply and ancillary services (e.g. door entry systems) from April 2026. These new contracts reflect lessons learned from the current contracts in relation to the performance measures included, also fully reflecting changes in technology and the systems to be maintained across the housing stock, particularly on the communal heating network.

2.11 The service currently being delivered by BTU relates to individual heating systems is being insourced and the new in-house service will go live April 2026, alongside an accelerated boiler replacement programme. This will make sure all older boilers are phased out in the next 2 – 3 years and that the Council has greater visibility and control over appointments made and kept.

# 3 Risk mitigation and monitoring

- 3.1 Between November 2024 and July 2025, the Council implemented significant improvements to address the recommendations made. The Council has worked to go beyond the essential work to meet recommendations and adopt best practice. This includes changes to how we work and the systems supporting our services. These include:
  - The recruitment of a 'Lessons Learned Lead', who actively fosters a culture
    of change within our repair team, strongly emphasising advocating for
    residents. This role has been so effective that we have now engaged
    another Lessons Learned Lead to further support change across our
    Neighbourhoods teams.
  - The introduction of a completions team which tracks every recommendation made in a stage 1 complaint to prevent escalations to stage 2 or to the Ombudsman, but more importantly, to make sure residents receive the service or compensation that is due to them.
  - The launch of a new repair system called ROCC in December 2024, which streamlines the handling of repairs by integrating multiple functions, including repair management and appointment scheduling. A key feature of ROCC is its ability to support self-service options for residents. ROCC also allows the repairs team to track appointments and manage work in realtime, ensuring that jobs are completed more efficiently and accurately.
  - At the same time, the Council introduced a new online portal for checking the status of service requests and repairs through Madetech. Residents can access up-to-date information directly, reducing delays and ensuring they always know the status of their requests.
  - Recognising that complaints are generally on the rise among local authorities, particularly in London, Camden has established the London Local Authority Complaints Forum. This initiative allows officers who handle complaints to share ideas and best practices, enabling them to learn from one another and enhance the service provided to residents. So far, three other local authorities have contacted us to understand how we engaged

with the Ombudsman, and they are particularly interested in the new improvements we have introduced.

- A review of complaint handling processes, training of staff and new templates for complaint responses issued that reflect learning from the Ombudsman's review.
- A new compensation policy was approved by the Audit and Corporate Governance Committee, which was thoroughly reviewed by officers and consulted on with the Residents' Panel.
- Additional steps to quality assure complaint responses, including reviews of complaint responses by the Customer Experience Oversight Panel.
- A new policy on how resident vulnerabilities will be considered as part of service delivery was approved on 31/07/2025.
- 3.2 Council officers met with the Housing Ombudsman regularly and talked through our work to address their recommendations and proposed improvements. These collaborative meetings proved invaluable, providing a deeper understanding of industry standards and allowing us to learn from their experiences with other organisations.
- 3.3 Furthermore, officers actively sought feedback from stakeholders, including residents, staff, and partner organisations, to ensure the Council aligned its initiatives with their needs and expectations. The Council conducted workshops with the Housing Customer Experience Oversight Panel and surveys to gather insights, which were instrumental in guiding improvement efforts.
- 3.4 Through these proactive measures, we addressed the specific action points and laid the foundation for further improvements through the housing transformation programme. Our focus on continuous improvement has equipped us to serve our community better and foster greater trust and satisfaction among those we support. We are committed to maintaining this momentum as we move forward, ensuring that we meet and, where possible, exceed the standards established by the Housing Ombudsman and other regulatory bodies.

#### 3.5 Housing Ombudsman Sign Off

The Council met with the Housing Ombudsman on 12 July 2025. At this meeting, the Housing Ombudsman confirmed it was satisfied with the Council's progress and confirmed the investigation was closed. They wrote to say:

"Following our monitoring meetings and a thorough review of the action plans and supporting evidence provided by Camden, we are satisfied that all 13 recommendations outlined in the Special Report are being actively addressed.

- 3.6 While we acknowledge that some actions remain in progress and that continued effort is essential for meaningful change, it is clear that Camden is taking steps to address the systemic issues identified in our investigation. We commend the commitment demonstrated toward implementing lasting improvements and preventing future failings for the benefit of its residents. We will now transition to routine monitoring of our casework data."
- 3.7 The full Housing Ombudsman Paragraph 49 report and approved action plan were presented to the Housing Scrutiny Committee on 15<sup>th</sup> of September, where the committee agreed to note the report. This report can be accessed here Housing Ombudsman Scheme report and action plan.pdf
- 3.8 It is important to highlight that there has been an improvement in the handling of complaints and the determination of service failure orders. Since January 2025, the Ombudsman has issued a total of 54 determinations. Out of these, 20 cases involved Service Failure Complaint handling, which also includes stage 2 complaints. In contrast, 34 cases concluded that no service failure orders were issued.

#### 4 Outlook for the next 12 months

- 4.1 The Council must anticipate, however, that given the size and age of the housing stock and the volume of repairs carried out, it will continue to receive complaints. Like many authorities in London, we have observed an increase in housing complaints in recent years, particularly in relation to repairs. On a national level, the Ombudsman has reported a staggering 474% increase in complaints concerning the condition of social rented homes and how repairs are handled. It is therefore vital that the Council delivers the objectives set out in its Housing Investment Strategy and the additional investment of £670m in the housing stock.
- 4.2 In response to these challenges, we have taken proactive measures to increase the size of our Property Management Stage 1 case management team, significantly improving response times. As set out earlier, we have established a dedicated completion team focused on fulfilling our commitments regarding complaint responses, which has demonstrated considerable success.
- 4.3 The Completions Team forms an integral part of Camden's stage one complaints process. It was established to ensure that issues raised by residents through Stage One complaints are fully resolved and that all associated remedial works are completed to the required standard.
  - The creation of the team followed findings from the Housing Ombudsman, specifically paragraph 49 of their report, which identified the need for greater accuracy in Camden's complaint-handling processes, including improved monitoring and verification of follow-on actions.
  - A clear operational protocol has been introduced to ensure that contractors and relevant council departments complete all necessary repairs linked to a complaint. Once the works are confirmed as complete, the resident is contacted

to verify their satisfaction. A formal completion letter is then issued to close the case

- 4.4 Complaints analysis and resident feedback previously indicated that Camden needed to strengthen oversight of follow-on repairs. In response, a Completions function was introduced within the Casework Team to improve assurance, tracking, and accountability. The Completions Team is responsible for:
  - Monitoring and tracking all work arising from complaints.
  - Verifying completion of those works in collaboration with contractors and service departments.
  - Contacting residents to confirm that the reported issues have been fully resolved to their satisfaction.
  - Formally closing the case only when both the team and the resident are satisfied that all actions have been completed.
- 4.5 Furthermore, the Lessons Learned Lead is instrumental in driving a transformative culture within our repair team, with a relentless focus on advocating for our residents. The impact of this position has been so positive that we have appointed an additional Lessons Learned Lead to foster meaningful change and learning from complaints across the Neighbourhood Housing teams.
- 4.6 It is also important to recognise the work being done to increase investment in the Council's homes with the Housing Investment Strategy approved in January 2025, alongside a commitment to invest £670m in the housing stock. This strategy will help the Council address the root cause of property condition complaints through additional investment and proactive asset management.
- 4.7 In terms of policy, in collaboration with our Residents' Oversight Panel, members of this committee will be aware that we co-produced a comprehensive new compensation policy aimed at enhancing our service delivery and ensuring fairness in how we handle complaints. The oversight panel comprises a diverse group of residents who bring valuable perspectives and experiences to the table. They meet monthly with our case management team to meticulously review the quality of our responses to complaints, evaluating everything from timeliness to effectiveness. During these meetings, panel members are encouraged to provide constructive feedback and suggest improvements based on their unique insights.
- 4.8 This ongoing partnership with residents has helped transform our approach to complaint handling. We have developed a more responsive and empathetic framework for addressing concerns by actively involving our residents in the process. The collaboration not only empowers residents but also fosters a sense of community and trust between them and our organisation. We believe this initiative is a significant step toward enhancing customer satisfaction and ensuring that every voice is heard and valued. Through these efforts, we aim to create a more positive experience for all our residents, ensuring their

concerns are managed with the utmost care and consideration. To ensure that all residents can see the changes taking place, we have created a dedicated microsite on the Camden website. This site showcases the work being done by this panel.

- 4.9 For residents who may be digitally excluded, we now host twice-yearly Heads of Service events to provide updates on our current initiatives, including improvements related to complaints. Since May 2025, we have successfully launched a series of eleven Neighbourhood Action Days across the Borough, prioritising localised face-to-face interaction. These events have proven to be immensely popular, with nearly a thousand residents connecting with a diverse range of Housing and Property Management services. Councillors and members of the public can explore the highlights of these action days on our dedicated microsites hosted on the Camden website.
- 4.10 To ensure that our changes to complaint handling are genuinely leading to improvements, over the past year, we have engaged with more than 1,000 residents who submitted a Stage 1 complaint (see Appendix 2) to gather comprehensive feedback on how their complaints were handled. This proactive approach helps us better understand the resident experience and highlights areas where we can improve our services.
- 4.11 The results from this thorough feedback process are very encouraging, showing a remarkable 50% increase in satisfaction levels compared to the previous year. This increase indicates that our efforts to address concerns, improve communication, and streamline our complaint resolution processes are resonating well with the community.
- 4.12 We believe that listening to our residents and incorporating their feedback is crucial for fostering a positive and responsive environment. Moving forward, we remain committed to maintaining this momentum and continuously enhancing our engagement with residents to ensure that their voices are heard and valued. This campaign was recognised by the Housing Ombudsman as a good practice example. It shows that we are addressing their concerns and can demonstrate that our new approach is producing positive outcomes for residents who want to file complaints about our service.

## 5. Legal Comments of Borough Solicitor

- 5.1 The Borough Solicitor has been consulted and has added the following comments. The Ombudsman's Complaint Handling Code sets out best practice for landlord's complaint handling procedures, to enable a positive complaints culture across the social housing sector, regardless of the size or type of landlord. The Code encourages landlord-tenant relationships so that residents can raise a complaint if things go wrong. The Complaint Handling Code became statutory on 1 April 2024, meaning that all members of the Housing Ombudsman Scheme are obliged by law to follow its requirements.
- 5.2 A Housing Ombudsman Section 49 report is a special investigation report that

the Ombudsman publishes after looking beyond an individual complaint to see if there are systemic failings within a landlord's services, like with repairs or complaint handling.

## **6** Finance Comments of the Executive Director Corporate Services

- 6.1 The Executive Director Corporate Services has been consulted, has been consulted and has added the following comments: The Council has incurred additional costs from its actions in responding to the Ombudsman's recommendations set out in 3.1. However, clearly it was an urgent priority to make the improvements recommended by the Ombudsman, and therefore these costs were unavoidable.
- 6.2 Clearly, however, to reduce the risk of future issues with housing repairs complaints, the Council needs to address the root causes of those complaints. This is challenging given the financial pressures facing its Housing Revenue Account. However, the Council has prioritised investments in service improvements such as the launch of ROCC and Madetech and is making capital investments in the stock through its Asset Management Strategy (AMS). The AMS unlocks additional resources to invest in the stock by disposing of poorly performing assets and it also means that the Council no longer has responsibility for maintaining those assets which are costly and often the source of complaints.

# 7 Environmental Implications

No environmental impact.

## **Appendices**

- 1. Principal Risk information and action plan ('risk on a page').
- 2. KWEST outbound call campaign focused on the complaint handling process.

REPORT ENDS

# Appendix 1: Principal Risk information and action plan (risk on a page)

# 25. Complaints in housing repairs

Current Score: 9 (L: 3, I: 3) Target Score: 2 (L: 2, I: 1) Outlook: Stable

**Risk:** Inefficient and non-compliant handling of complaints leads to escalation of cases and referrals to Housing Ombudsman

**Cause:** Tenants dissatisfaction with housing conditions or the delivery of repairs, timeliness and communication, increase in number of complaints put pressure of staff workloads, inadequate complaint handling systems and processes

**Consequence:** Financial pressures due to increased number of compensation payments and costs in responding to legal claims, reputational damage, regulatory action by Housing Ombudsman **Risk Update:** 

There has been an increase in the number of complaints received by the Council in recent years. This trend is primarily driven by a significant increase in repair complaints, for issues such as damp and mould, which have been seen across all housing providers. In 2024/25 the Council received 2,479 landlord related stage 1 complaints, compared to 1,564 in 2023/24. This reflects national trends whereby the Ombudsman has reported a staggering 474% increase in complaints concerning the condition of social rented homes and how repairs are handled across the UK, with about 47% of their cases generated within London. It is noted that Camden's proactive outreach has also resulted in increased reporting of complaints and there has been a corresponding increase in the number of Camden cases referred to the Housing Ombudsman (HO). The Housing Ombudsman's Complaint Handling Code was updated and became a joint Code with the Local Government and Social Care Ombudsman (LGSCO), Compliance with the Code became mandatory for all Social Housing Landlords from 1st April 2024. HO has started to increase the severity of their findings on cases escalated to them for review, resulting in higher levels of compensation being awarded. The Housing Ombudsman has now concluded its investigation into Camden's handling of leaks, damp and mould, complaints, and repairs, and their findings were published November 2024. Between November 2024 and July 2025, the Council put in place significant improvements to address the recommendations made, working to go beyond the essential work to and adopt best practice. This includes changes to how we work and the systems supporting our services. Of the 13 recommendations, 10 related to complaints handling. The Council worked closely with the HO on its action plan and this was fully signed off by HO in July 2025 with a report provided to the Housing Scrutiny Committee in Sept 2025. The action plan from the HO report was developed jointly by the service and the central complaints team.

# **Existing Controls**

- Annual self-assessment on compliance with Housing Ombudsman Complaints Handling Code (new regulatory requirement from April 2024)
- 2. Annual Complaints Handling and Service Improvement Report (new regulatory requirement from April 2024)
- 3. Annual Complaints Report to monitor trends and identify areas for improvements.
- A new case management system introduced which allows a webform directly into the system and allows all complaints to be better managed
- 2. Increased our staff resources to reduce delays in handling complaints at all process stages.
- 3. All compensation offered is reviewed by the case management team leader or head of service before submission to the resident.
- 4. Expanding the Housing case management team role to include both repairs and neighbourhood complaints case management in one place, to ensure cohesive responses.
- 5. Creation of an additional Lessons Learned Lead post to analyse neighbourhood cases
- 6. Introduction of a 'completions team' to focus on the completion of actions in complaint responses helping to reduce escalations to stage 2.
- 7. Creation of the Housing Customer Oversight panel that reviews current trends and concerns and improvements needed going forward
- 8. Neighbourhood Liaison Team that works in a customerfocused, joined-up way to resolve complex case work across the repairs service and neighbourhood housing services.

Actions Action owner Status Due Date Risk sponsor

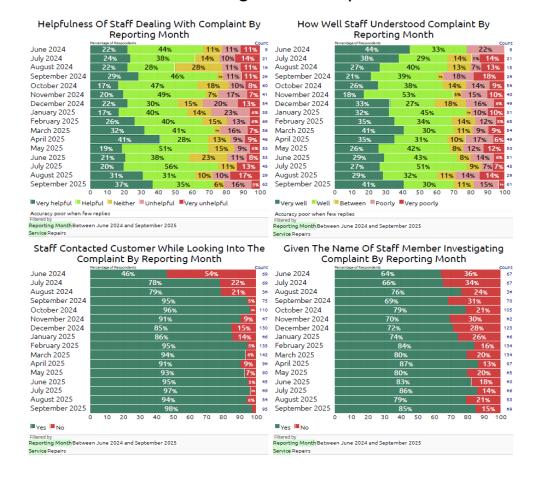
<ol> <li>Continue to provide regular reports to the Housing Board</li> <li>Implement changes to case management processes to ensure effective collaboration between teams to resolve complaints.</li> <li>Haynes</li> <li>In progress</li> <li>In progress</li> <li>Ongoing</li> <li>Ongoing</li> </ol>	G. Marston
---	------------

# Appendix 2: KWEST outbound call campaign focused on the complaint handling process.

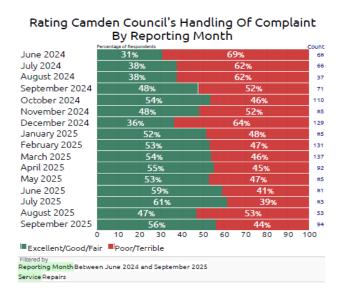
# Camden's Acknowledgement Of The Complaint



# Personal Care During The Complaint Procedure



# Outcome Of Complaints Process



<sup>\*</sup>Includes complaints that we did not uphold