



Board:	GROUP BOARD
Meeting date:	19 SEPTEMBER 2025
Title:	ANNUAL SUMMARY OF COMPLAINTS
Status:	OPEN
Author:	DAVID RILEY, DIRECTOR OF CUSTOMER EXPERIENCE
Purpose:	To review the Annual Summary of Complaints for 2024/2025.
Recommendations:	<p>It is recommended that Members:</p> <ul style="list-style-type: none">▶ Consider and note the contents of this report.▶ Comment on performance▶ Recommend approval to Group Board
Business Plan Implications:	This paper supports the business objectives of emh Group, in particular, its core value of Excellence, which states, “We will aspire to be the best, particularly in the quality of customer services and standards of performance.”
Risk and Assurance Implications:	This is a statutory requirement and must be published on emh website by 30 September 2025.
Legal/Regulatory implications and impact on Asset and Liability Register:	A key deliverable under The Housing Ombudsman’s Complaint Handling Code
Hearing and acting upon the voice of our tenants, residents and service users:	It is important that members fully understand and hear from our customers
Implications for our Organisational Values:	Learning from dissatisfaction reflects our values as a landlord and our desire to demonstrate Integrity, Diversity, Openness, Accountability, Clarity and Excellence.



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1. Purpose:

- 1.1 To review performance in complaint handling for 2024/25, including the Housing Ombudsman’s mandatory document, “Appendix A – Self-Assessment Form”
- 1.2 We understand that when things go wrong, our customers want their concerns resolved quickly, effectively, and to a high standard. Our ambition is to deliver a consistently high-quality complaints experience that puts customers first. We welcome the self-assessment process as a valuable opportunity to reflect, challenge ourselves, and identify where we can do better.

2. Sign off from Scrutiny Panel, our Member Responsible for Complaints and Resident Influence Committee:

- 2.1 Quote from Helen Watkinson, Resident and Chair of Scrutiny Panel: ***“I’m pleased to see such an honest assessment of performance reported in the Self-Assessment this year. I am a member of the Housing Ombudsman’s resident panel and this is the kind of reporting needed. Scrutiny Panel have recently signed off a review into complaints communication and witnessed some of the improvements to complaints handling and service requests that will feed through to next year’s report. I was easily able to sign off the self-assessment as Chair of Scrutiny Panel.”***
- 2.2 Quote from Gail Puttock, Resident Group Board Member and Member Responsible for Complaints: ***“There has been a real change in approach to complaint handling in recent months and I am delighted that the self-assessment is transparent and honest in its findings. At emh, we don’t always get things right, but what I am now seeing is that we learn from our mistakes and champion the resident in our responses. We have more work to do, but I am confident that next year’s report will show real improvements and I am happy to recommend sign off of the assessment and this report to Group Board.”***
- 2.3 Quote from Andrew Murtha, Chair of Resident Influence Committee: ***“At my first meeting as Chair of the Resident Involvement Committee (RIC), I was tasked with recommending the Annual Summary of Complaints for 2024/25 for approval. This summary, which reflects the previous financial year, is detailed and factual, and importantly, it provides clear evidence that residents’ voices are being heard and acted upon.***

Five months into the new financial year, the same meeting also highlighted significant improvements to the complaints service—improvements that were recognised by both emh staff and tenants. These developments will be



reflected in next year's report, but it is encouraging to see such progress already taking shape.

In a less formal meeting between RIC members and housing regulators, members were full of praise for the strides made in listening to tenants and the quality of information now being shared with us. This informal feedback reinforces the formal findings and reflects a growing confidence in the complaints process and wider engagement mechanisms.

At the RIC meeting, there was unanimous agreement to recommend the Annual Summary of Complaints for approval by the Group Board."

3. Executive Summary:

- 3.1 Complaint volumes increased from 1925 in 23/24 to 2230 in 24/25, up by 305, or 16%.
- 3.2 In their Regulatory Judgment of 27 November 2024, the Regulator of Social Housing note "Providing tenants with an appropriate level of service is a key strategic objective for emh group and we saw evidence in areas where this is being delivered. However, we also saw evidence, in relation to customer contact services, where performance was weak, and there has been a significant increase in the overall number of complaints."
- 3.3 Against the Housing Ombudsman's "Appendix A – Self-Assessment Form, 9 of 72 areas have been marked as either partially or non-compliant, with 63, or 88%, as fully compliant. The non-compliance largely relates to exceeding the timescales for sending responses to customers, be that at acknowledgment, Stage 1 or Stage 2, especially at a time from April to Sept 2024, when the Complaints Resolution Team were working through backlogs.
- 3.4 A change in management structures, from November 2024, saw the appointment of a Director of Customer Experience overseeing complaints and this has ensured compliance with the Complaint Handling Code throughout 2025, albeit recognising that this is an annual review from April 2024 and much of the year had passed by this time.
- 3.5 The Housing Ombudsman's published maladministration rate for 24/25 was 80%, up from 74% in 23/24 and against a national figure of 72% for landlords of our size. The delays in timeliness of resolution in 3.3 feature heavily, with the maladministration rate for complaint handling being 92%. This included two cases where, in total, three instances of severe maladministration were found. These cases have been reviewed at Group Board and one formed the basis for an independent review.
- 3.6 A proof of concept, looking at the early resolution of dissatisfaction, through a Service Resolution Team, was launched in 24/25. It has proven to be very successful and became a permanent part of our structures at the start of the 25/26 financial year. It has reduced complaint volumes significantly and the improvements will be reflected in next year's report.



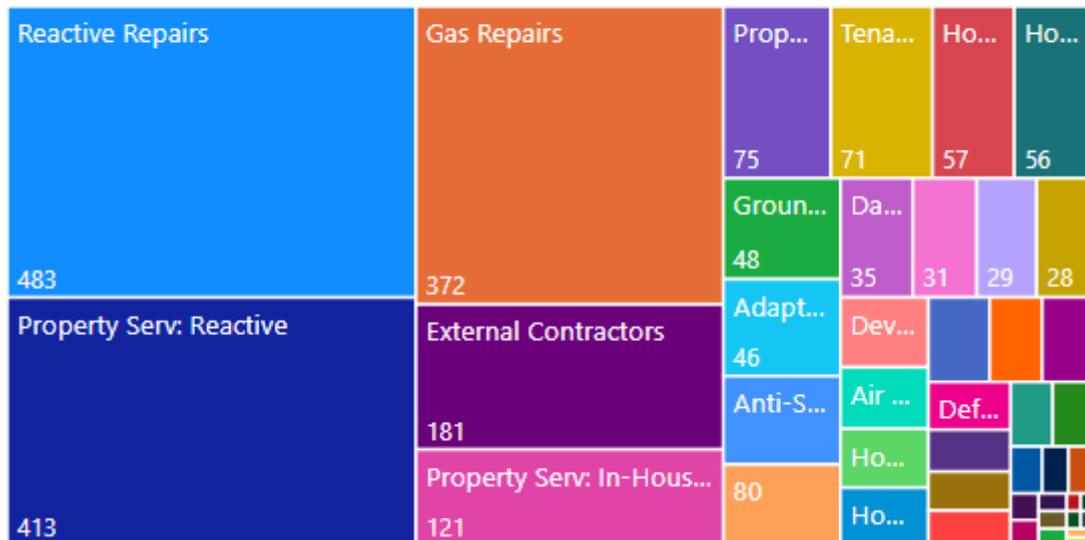
3.7 Satisfaction with complaint handling, as reported through our Tenant Satisfaction Measures, for 24/25, was low, at 33%, again reflective of the backlogs and delays outlined.

4. Complaint Volumes, Trends and Analysis

4.1 Stage 1

- 4.1.1 Timeliness – Against reported metrics, our compliance with timescales decreased from 100% in 23/24 to 90.5% overall, broken down as 90.7% for our low cost rented accommodation and 86.5% for our shared owners, allowing for a permitted extension.
- 4.1.2 Average working days to resolve a complaint in 24/25 was 14.2 days, down from 23.7 days in 23/24.
- 4.1.3 Looking at a breakdown of complaints received, reactive repairs accounted for 896 of 2230, or 40% and this is typical of housing associations. At emh, there were 74364 repairs carried out last year, so this represents just 1.2% of jobs completed.

Complaint Category



4.1.4 April 24 saw the introduction of a new gas contractor, Phoenix Gas and I am pleased to note that gas repairs are no longer the largest source of complaints as they were in previous years, reducing to 17% of overall volumes.



4.2 Stage 2

- 4.2.1 Timeliness – Against reported metrics, our compliance with timescales decreased from 100% in 23/24 to 84% overall, this being 83.4 for our low cost rented accommodation and 95% for our shared owners.
- 4.2.2 The rate of escalation to Stage 2 increased in 24/25 to 18%, up from 12% in 23/24. The increase is reflective of increased expectations around compensation, exacerbated by delays in getting complaint responses to customers.
- 4.2.3 Complaint categories for Stage 2 complaints are broadly similar to those for Stage 1, with no systemic issues identified.

Complaint Category



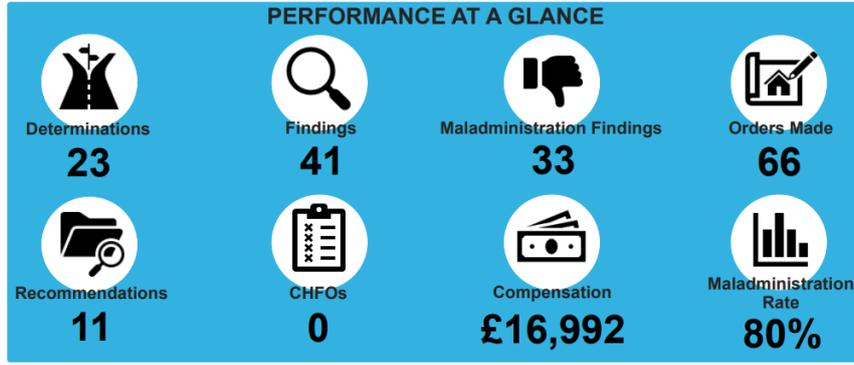
4.3 The Housing Ombudsman

- 4.3.1 Determinations from The Housing Ombudsman, increased by 7, from 16 to 23, with 41 findings and 66 orders made from these cases.



Housing Ombudsman Service **LANDLORD PERFORMANCE** DATA REFRESHED: May 2025
April 2024 - March 2025

Landlord: East Midlands Housing Group Limited
 Landlord Homes: 19,307 Landlord Type: Housing Association



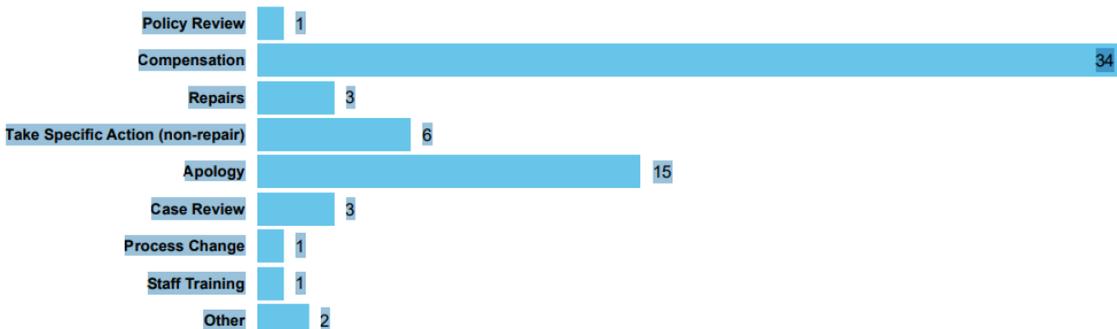
4.3.2 Of the findings, property condition (repairs) and complaint handling, formed 78% of the total. Without the findings for complaint handling, the maladministration rate would have been 55% and this has been a focus for improvement in 25/26.

Landlord Findings by Category | Cases determined between April 2024 - March 2025 Table 2.3

Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Property Condition	1	8	4	0	5	1	0	0	19
Complaints Handling	1	7	4	0	0	1	0	0	13
Anti-Social Behaviour	0	3	1	0	0	1	0	0	5
Estate Management	0	1	1	0	0	0	0	0	2
Charges	0	0	1	0	0	0	0	0	1
Moving to a Property	1	0	0	0	0	0	0	0	1
Total	3	19	11	0	5	3	0	0	41

4.3.3 Of the 66 orders made by The Housing Ombudsman, 34, or 52%, were due to insufficient compensation being paid.

Orders Made by Type | Orders on cases determined between April 2024 - March 2025 Table 4.1





5. Lessons Learnt from Complaints

5.1 The process for learning from complaints has been revamped during the year, to give customers visibility to changes being made as a result of their feedback. These are published on a “you said we did” page, accessed by the following link - [You Said, We Did - Improving the Resident Experience - emh homes](#). The greater transparency reflects the importance that emh is making to service improvement and learning from its mistakes or unnecessarily clunky processes. A target of 50 improvements has been set for the 25/26 financial year.

6. Self-Assessment

6.1 The self-assessment has been approved by both our Scrutiny Panel and Member Responsible for Complaints, ahead of Board approval. Their comments are shared in Section 2 of this report.

6.2 We are compliant in 63 of 72 areas, or 88% of the requirements of the Complaint Handling Code. However, to give visibility in a lengthy document to the 12% of areas that are either partially or non-compliant, these are shared below. All will be followed through to completion by Scrutiny Panel and Group Board. The full report is included within this pack.

6.3 Five of the nine areas relate to timeliness of response to complaints, previously referenced in this report.

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	PARTIALLY	All Customer Services colleagues receive training on how to raise a complaint, both at induction and via refresher training. Refresher training was most recently carried out on 1 April 2025. There is a potential gap to confirm that all staff are aware of the complaints process and this will be strengthened in 2025/26	This will form part of an action plan, agreed by our customer-led Scrutiny Panel.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	PARTIALLY	Section 4.1.9 of our Complaints Policy and Process states “We shall comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual’s needs. We would refer to our Equal Opportunity policy in place to address this.” Complaints Policy & Process	The process for recording reasonable adjustments within our housing management system is under review, with a recommendation being taken to our November 2025 Homes Board meeting. Disabilities and reasonable adjustments are currently recorded; however, the current framework is complicated and the process for active review needs to be strengthened.



5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	PARTIALLY	The Acceptable Behaviour Policy is not currently available on the emh website and should be, hence the “partially” compliance label. This will be rectified during 2025/26	None
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	PARTIALLY	This has been witnessed by our customer led Scrutiny Panel and further independently assured by our internal auditors, Beevers and Struthers. It is referenced in our Complaints Policy & Procedure; Section 7.1.2 “A complaint will be logged within 5 days of receiving it” Complaints Policy & Process	This became fully compliant from November 2024, after the newly appointed Director of Customer Experience, noticed errors in the logging and acknowledgment processes prior to November.
6.3	Landlords must issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.	NO	65.5% of complaints were resolved within 10 working days in 2024/25, as the Complaints Resolution Team cleared backlogs from April to September 2024.	The Complaints Resolution Team recovered strongly from November 2024, however, the overall result is behind expectations, as a cumulative measure for the year.
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	NO	90.5% of complaints overall were resolved within the allowed extension period of a further 10 working days in 2024/25. This means that 212 complaints were out of timescales.	The Complaints Resolution Team recovered strongly from November 2024, however, the overall result is behind expectations, as a cumulative measure for the year.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	PARTIALLY	82.08% of complaints were resolved within 20 working days in 2024/25, this being behind expectations.	Working practices changed after the newly appointed Director of Customer Experience noticed delays in Stage 2 resolution response times and these improved from November 2024.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and	PARTIALLY	83.96% of complaints overall were resolved within the allowed extension period of a further 20 working days in 2024/25, this being behind expectations.	Working practices changed after the newly appointed Director of Customer Experience noticed delays in Stage 2 resolution response times and these improved from November 2024.



	the reason(s) must be clearly explained to the resident.			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	PARTIALLY	<p>Colleagues from the Complaint Resolution Team comply with the standard objective outlined, however, there is no evidence that this is the case outside of this group.</p>	<p>This will be rectified in 2025/26.</p>

7. It is recommended that Members:

- ▶ **Consider and note** the contents of this report.
- ▶ **Comment on** performance.
- ▶ **Recommend** approval to Group Board