

Appendix C: Complaints Service Improvement Plan — 2025/26 Progress and 2026/27 Forward Plan

Purpose

This appendix provides assurance on Lewisham Council's approach to continuous improvement in complaint handling. It brings together the 2025/26 Complaints Service Improvement Plan, the Complaints Reset Programme, the closed 2025/26 position and the 2026/27 Housing Improvement Plan. It also draws together improvement activity arising from the Housing Ombudsman's Special Investigation under Paragraph 49, Duty to Monitor engagement, internal audit recommendations, member and service scrutiny, Corporate Assurance Board oversight and wider housing transformation activity.

The appendix demonstrates the improvement journey from operational stabilisation and Complaint Handling Code compliance in 2025/26 towards a longer-term programme focused on organisational learning, resident insight, transparency, service ownership, evidence of impact and measurable improvement in outcomes for residents. Annex C1 is retained as the original submitted improvement plan to preserve the evidence trail between the 2025/26 annual complaints report and the forward 2026/27 programme.

Part 1: 2025/26 Complaints Service Improvement Plan — Year-End Position

The 2025/26 Complaints Service Improvement Plan was established to improve compliance with the Housing Ombudsman Complaint Handling Code, strengthen governance, improve response timeliness, increase early resolution, embed learning from complaints and improve the resident experience. It also sought to increase organisational capacity, improve performance oversight and develop key supporting policies and procedures.

Closed Position Summary

Improvement Area	Key Actions Delivered During 2025/26	Year-End Position	Evidence of Impact	Future Action	Status
Team capacity and resilience	Additional complaints capacity was secured and resilience arrangements were strengthened.	Additional capacity is in place and embedded within the service.	Improved capacity has supported stronger complaint handling oversight and reduced reliance on short-term escalation arrangements.	Monitor through business-as-usual management performance arrangements.	Complete
Performance management and KPIs	An enhanced KPI suite and regular complaint performance review meetings were introduced.	Enhanced reporting and governance arrangements are established.	Senior leaders receive more regular performance information, enabling earlier identification of risks, overdue cases and emerging service themes.	Continue reporting through the Complaints Project Group, Directorate Management Team and wider governance routes.	Embedded & Ongoing
Process mapping and	Complaint handling	Core processes are	Complaint handlers have	Maintain ongoing	Complete

complaint handling procedures	process maps, extension protocols and supporting guidance were developed and implemented.	documented and operational.	clearer process guidance, supporting more consistent approaches to acknowledgements , responses and extensions.	review through the continuous improvement programme.	
Complaint Handling Code compliance	Extension protocols were introduced and mandatory complaint handling training was progressed.	An improved compliance framework is established.	Improved procedures, training and compliance monitoring provide a stronger basis for evidencing alignment with the Code.	Continue monitoring through self-assessment, audit actions and complaint performance reporting, with refreshed assurance activity carried into 2026/27.	Ongoing
Early resolution	Frontline resolution guidance was introduced to support earlier intervention.	The approach has been implemented and incorporated into service delivery.	The service has increased its focus on resolving complaints at the earliest appropriate stage and reducing unnecessary escalation.	Continue monitoring escalation rates, repeat complaints and quality of resolution throughout 2026/27.	Ongoing
Learning from complaints	Learning was recorded through iCasework and reviewed through complaint governance arrangements.	The learning process is embedded across complaint handling arrangements.	Learning from complaints is now more visible through governance reporting and is used to inform wider service improvement activity.	Shift focus to evidencing the impact of learning on resident outcomes and service performance.	Ongoing
Resident communication	Communication standards, proactive updates and use of telephony were strengthened.	Improvements have been implemented, but further embedding is required.	Resident communication has a clearer operational focus, although ongoing improvement is required to ensure consistency across all cases.	Include within the 2026/27 resident insight and complaint quality programme.	Ongoing

Tenant satisfaction monitoring	Monitoring arrangements were established for TP06, TP07, TP08 and TP09.	Monitoring is incorporated into performance reporting.	Tenant satisfaction measures provide a clearer evidence base for identifying areas where residents are not yet experiencing improvement.	Expand analysis within the 2026/27 programme, including demographic and equalities insight where data is available.	Ongoing
Compensation guidance	Staff guidance and awareness of compensation and remedies were strengthened.	The compensation framework is operating more consistently.	Complaint handlers have clearer expectations on proportionate remedies and putting things right.	Continue to monitor the impact on complaint escalation, Ombudsman referrals and resident outcomes.	Complete
Reasonable adjustments policy	Policy development was progressed.	Drafting and consultation progressed but were not fully concluded within the original timescale.	The work has clarified policy requirements and the need for stronger alignment with vulnerability and accessibility arrangements.	The Reasonable Adjustments Policy has been approved in 2026/27 and uploaded to the Council's website.	Carried Forward & Completed 2026/27
Knowledge and Information Management Strategy	Strategy development commenced.	Significant progress was made, but implementation remains ongoing.	The work has strengthened understanding of the link between record keeping, complaint quality and the ability to evidence service decisions.	Incorporate within the Housing Improvement Plan 2026/27.	Carried Forward
Vulnerability policy review	The review commenced.	The policy review was not completed within the original timescale.	The review has identified the need for clearer arrangements for recognising and responding to resident vulnerability across housing services.	The Vulnerable Residents Policy has been approved in 2026/27 and uploaded to the Council's website.	Carried Forward & Completed 2026/27

Key Learning from 2025/26

The 2025/26 programme strengthened operational control of complaint handling, established stronger governance arrangements, improved oversight of performance, clarified complaint handling processes and embedded a more systematic approach to learning from complaints. It also identified areas requiring longer-term focus, including the need to evidence the impact of learning, strengthen resident insight, improve transparency, understand differential satisfaction and implement recommendations arising from external assurance activity. These themes have informed both the Complaints Reset Programme and the Housing Improvement Plan 2026/27.

Part 2: Complaints Reset and Continuous Improvement

Following the initial stabilisation activity delivered through the 2025/26 programme, the complaints improvement approach was reset to focus on organisational culture, learning from complaints, complaint escalation, resident satisfaction, demographic insight and evidence of service improvement outcomes. This ensured that improvement activity moved beyond process compliance towards demonstrating measurable improvements for residents and embedding learning across housing services.

Part 3: Outstanding Actions and Transition into the 2026/27 Improvement Programme

The Housing Improvement Plan 2026/27 incorporates outstanding actions from the 2025/26 Complaints Service Improvement Plan together with additional improvement activity arising from the Housing Ombudsman's Special Investigation under Paragraph 49, Duty to Monitor engagement and internal audit recommendations. This approach ensures continuity of improvement activity and provides a clear line of sight between actions completed during 2025/26, actions requiring longer-term delivery and new improvement requirements arising from external assurance activity.

As part of the 2026/27 complaints improvement programme, the Council will hold a cross-service Complaints Learning and Improvement Workshop. This will provide a structured opportunity to share the outcome of the Complaint Handling Code self-assessment, brief managers and frontline staff on progress against the improvement plan, reinforce the areas where operational practice is not yet consistently meeting the Code, and agree any further actions required to strengthen both housing and corporate complaints arrangements.

The workshop will focus on the key weaknesses identified through the self-assessment, including acknowledgement and response timescales, resident updates where extensions are required, Stage 2 escalation handling, reasonable adjustments recording and review, third-party complaint handling, action tracking, record keeping, evidence retrieval, service ownership, quality of complaint responses and demonstrating the impact of learning from complaints.

Outputs from the workshop will be used to test whether the 2026/27 Housing Improvement Plan fully addresses the self-assessment findings, whether further corporate complaints actions are required, and whether improvement activity is sufficiently clear, owned, measurable and capable of demonstrating impact for residents.

Additional Assurance Checks for the 2026/27 Plan

Before finalising the 2026/27 plan, the Council will complete a further assurance check against the self-assessment to confirm that the plan captures all areas requiring improvement. This will include checking that each non-compliant or partially embedded area has a named owner, clear action, target date, evidence requirement, governance route and measure of impact.

- Confirm that all Code provisions marked as non-compliant in practice are reflected in the 2026/27 plan, including Stage 1 acknowledgements, Stage 1 response times, Stage 2 acknowledgements, Stage 2 response times, extension updates and reasonable adjustments.
- Check that third-party complaint handling actions include contractor templates, monitoring, evidence-return standards and escalation routes for PFI, TMO and other delivery partners.
- Ensure the plan includes measurable actions on record keeping, iCasework usage, evidence retrieval, action tracking and completion of promised remedies.
- Strengthen actions on resident communication, including agreed update intervals, clearer ownership of resident contact and quality assurance of extension letters and complaint responses.

- Include corporate complaints alignment, so learning, standards, templates, training and governance are consistent where the housing complaints process interacts with wider Council complaint arrangements.
- Use resident insight, Tenant Satisfaction Measures, Ombudsman findings, internal audit findings and complaint themes to test whether actions are focused on the right service failures and resident outcomes.
- Ensure every carried-forward action has an evidence-of-impact measure, not just a completion milestone.
- Report the workshop outputs and any amendments to the 2026/27 plan through the Complaints Project Group and senior governance arrangements.

Mapping of Part 1 Future Actions into the 2026/27 Improvement Programme

The table below shows how the future actions and statuses identified in Part 1 have been carried forward into the 2026/27 improvement programme, ensuring that agreed actions are retained, monitored and progressed.

Part 1 Future Action / Status	2026/27 Improvement Action	Reason for Carry Forward	Due Date / Status
Complaint Handling Code compliance — ongoing	Continue Code compliance monitoring through self-assessment, audit actions, complaint performance reporting and refreshed assurance activity.	The compliance framework is established, but continued monitoring is required to evidence sustained delivery against the Code in practice.	Ongoing through 2026/27
Early resolution — ongoing	Monitor escalation rates, repeat complaints and the quality of early resolution to ensure residents receive timely and effective resolution where appropriate.	Early resolution arrangements have been introduced, but further monitoring is required to demonstrate impact on Stage 2 escalation and repeat dissatisfaction.	Ongoing through 2026/27
Learning from complaints — ongoing	Monitor the impact of the learning-from-complaints process and evidence resulting service improvements.	Learning arrangements have been established, but further work is required to evidence the impact on service delivery and resident outcomes.	Ongoing through 2026/27
Resident communication — ongoing	Strengthen resident updates, extension communications, ownership of contact and quality assurance of complaint responses as part of the resident insight and complaint quality programme.	Communication standards have improved, but further embedding is required to ensure consistent updates and clear communication across all cases.	Ongoing through 2026/27
Tenant satisfaction monitoring — ongoing	Analyse Tenant Satisfaction Measures by equalities groups and identify action to address differential satisfaction where data is available.	Monitoring arrangements are in place, but deeper analysis is required to understand variation in resident experience.	September 2026
Transparency and resident information — ongoing	Publish Tenant Satisfaction Measure data more frequently and at a more granular level.	Additional transparency is required to show residents, members and regulators how performance information is being used to drive improvement.	April 2026

Compensation guidance — completed, with continued monitoring	Monitor the impact of compensation and remedy guidance on complaint escalation, Ombudsman referrals and resident outcomes.	The framework is operating more consistently, but ongoing monitoring is required to evidence whether remedies are reducing escalation and improving outcomes.	Ongoing through 2026/27
Reasonable Adjustments Policy — carried forward	Embed the approved Reasonable Adjustments Policy, including recording, visibility to relevant staff and active review arrangements for agreed adjustments.	The policy has been approved and published, but the self-assessment identifies the need to embed recording and active review in operational practice.	December 2026
Knowledge and Information Management Strategy — carried forward	Incorporate knowledge and information management actions within the Housing Improvement Plan, including iCasework usage, record keeping, evidence retrieval and data reliability.	Implementation remains ongoing and is central to improving complaint quality, Ombudsman evidence and assurance of service decisions.	December 2026
Vulnerable Residents Policy — carried forward	Embed the approved Vulnerable Residents Policy and monitor implementation across housing services, including alignment with reasonable adjustments and resident support arrangements.	The policy has been approved and published, but further work is required to ensure consistent operational implementation.	Ongoing through 2026/27
External assurance recommendations — carried forward	Implement recommendations arising from the Complaints Internal Audit Report, Duty to Monitor engagement and Housing Ombudsman Paragraph 49 findings.	External assurance identified further actions required to strengthen training, record keeping, templates, third-party complaint handling, extensions, action tracking and learning capture.	December 2026
Self-assessment assurance — ongoing	Maintain a clear evidence base for the Complaint Handling Code self-assessment and update the improvement plan where assurance activity identifies gaps.	Additional assurance is required to ensure the self-assessment remains fully evidenced, current and aligned with operational delivery.	September 2026

Evidence of Improvement and Impact

The Council has sought to move beyond measuring completion of improvement actions and increasingly focus on evidencing outcomes for residents, service delivery and organisational learning.

Improvement Area	Evidence of Improvement
Governance and oversight	Enhanced KPI reporting and regular review through the Complaints Project Group, Directorate Management Team and wider assurance arrangements.
Complaint Handling Code compliance	Revised procedures, extension protocols, training and self-assessment arrangements provide a stronger framework for Code compliance.
Learning from complaints	Learning is recorded and reviewed through governance arrangements, with a stronger focus in 2026/27 on evidencing resulting service improvements.

Resident communication	Communication standards, proactive resident contact and use of telephony have been strengthened, with continued monitoring through complaint quality and satisfaction measures.
Early resolution	The service has increased its focus on resolving complaints at the earliest appropriate stage and reducing unnecessary escalation.
Performance management	Complaint performance, overdue actions, emerging risks and service trends are subject to stronger management oversight.
Resident insight	Monitoring arrangements are in place for TP06, TP07, TP08 and TP09 and will be expanded through the 2026/27 programme.
Policy development	Reasonable Adjustments, Vulnerable Residents and Knowledge and Information Management policy improvements have been progressed and carried into the relevant 2026/27 improvement programmes.
External assurance recommendations	Paragraph 49 findings, Duty to Monitor recommendations and Internal Audit actions have been incorporated into the Housing Improvement Plan 2026/27, providing a consolidated route for monitoring delivery and impact.

Part 4: 2026/27 Forward Improvement Plan

The Housing Improvement Plan 2026/27 represents the next phase of complaints improvement activity. It focuses on sustaining compliance, strengthening assurance, improving transparency, embedding organisational learning and demonstrating the impact of service improvements on residents. The programme incorporates learning from the 2025/26 Complaints Service Improvement Plan, the Complaints Reset Programme, the Housing Ombudsman's Special Investigation under Paragraph 49, Duty to Monitor engagement and internal audit recommendations.

The key priorities for 2026/27 are:

- Embed a learning-from-complaints culture that evidences service improvements.
- Strengthen resident insight and understand differential satisfaction.
- Improve transparency through enhanced publication of performance information.
- Embed policy improvements relating to vulnerable residents and reasonable adjustments.
- Implement recommendations arising from external assurance activity.
- Maintain compliance with the Complaint Handling Code.
- Strengthen governance, assurance and oversight arrangements.

Assurance Statement

The Council has maintained a structured and evidence-based approach to complaint service improvement. The 2025/26 Complaints Service Improvement Plan focused on stabilising complaint handling performance, strengthening governance arrangements, increasing capacity, improving Complaint Handling Code compliance and embedding learning from complaints.

At year end, the majority of actions had either been completed or embedded into business-as-usual arrangements. Actions requiring a longer implementation period, together with recommendations and feedback arising from the Housing Ombudsman's Special Investigation under Paragraph 49, Duty to Monitor engagement, Internal Audit review, Housing Select Committee scrutiny, Service Performance Panel review and Corporate Assurance Board oversight, have been incorporated into the Housing Improvement Plan 2026/27.

This provides a clear line of sight between identified weaknesses, external scrutiny, improvement actions, governance oversight, evidence of impact and future priorities.

The Council therefore considers that complaint handling improvement activity is operating within a framework of continuous improvement, organisational learning and assurance that is consistent with the expectations of the Housing Ombudsman Complaint Handling Code.

Annex C1: Original Complaints Performance Improvement Plan — May 2025

This annex is retained as supporting evidence of the original complaints service improvement plan submitted as Appendix C alongside the Annual Complaints Performance and Service Improvement Report 2025/26. It is included here to preserve the evidence trail and demonstrate how the original improvement actions have informed the closed 2025/26 position and the forward 2026/27 improvement programme.

Annex C1 reproduces the content of the original submitted improvement plan.

COMPLAINTS PERFORMANCE IMPROVEMENT PLAN MAY 2025

Objectives:

Improve Timeliness of Complaint Responses:

Ensure compliance with the Complaint Handling Code: Stage 1 acknowledged within 5 working days and responded to within 10 working days; Stage 2 responded to within 20 working days.

Enhance Early Resolution Rates: Increase the number of complaints resolved at the first point of contact or at Stage 1.

Improve Performance with Housing

Ombudsman Casework: Zero Complaint Handling Failure Orders.

Strengthen Processes and Embed Learning:

Streamline and clarify complaint handling processes and systematically embed learning from complaints into organisational practice.

Improve Resident Experience: Enhance tenant satisfaction measures related to complaint handling, focusing on perceptions of fairness, respect and effective communication.

Policies and Strategies: Develop and agree key policies and strategies to support a positive complaints culture.

Outcomes:

Improved response timeliness to meet regulatory standards.

Increased early resolution rates reducing Stage 2 escalations.

Higher resident satisfaction with the complaint handling process.

Improved and streamlined complaint handling processes.

Enhanced data accuracy and compliance through better reporting.

Governance:

Complaints Project Group - monthly; Housing Transformation Programme Board - monthly; Portfolio Lead meeting - quarterly; Corporate Assurance Board - quarterly; Annual report to Mayor and Cabinet.

Measuring Success (Metrics):

Timeliness: Percentage of complaints acknowledged and responded to within Complaint Handling Code timescales (CH02).

Complaint Volumes: Relative number of complaints (CH01) and percentage reduction in complaints progressing to Stage 2.

Early Resolution: Increased percentage of complaints resolved at initial contact or Stage 1.

Tenant Satisfaction: Improvement in Tenant Perception Measures: TP06, TP07, TP08 and TP09.

Process Compliance: Regular audits showing compliance with extension protocols and compensation guidelines.

Learning and Development: Staff participation rates in mandatory training and quality of recorded learning on iCasework.

Performance Monitoring: Frequency of operational KPI reporting and attendance at performance review meetings.

Risks:

Delays in recruitment affecting timely implementation of improvements.

High complaint volumes potentially straining new processes.

Potential resistance to changes among staff.

Complexity in implementing systematic learning practices.

Financial constraints affecting proactive remedial actions.

Accuracy of reporting / available data.

Key Actions:

No.	Task	Start Date	Finish Date	Owner
1	Increase Team Capacity and Resilience:			
1.1	Recruit additional complaints officers by June 2025.	Apr-25	Sep-25	Director Housing Resident Engagement & Services
2	Performance Monitoring and Operational KPIs:			
2.1	Establish additional performance review meetings, initially weekly/fortnightly, transitioning to monthly by end of Q2.	Apr-25	Sep-25	Director Housing Resident Engagement & Services; Housing Complaints & Enquiries Team Manager
2.2	Develop and report on a robust suite of operational KPIs, including timeliness, resolution rates, resident satisfaction and compliance with procedures, building on existing reports to include acknowledgements and unassigned cases.	Apr-25	ongoing	Director Housing Resident Engagement & Services; Housing Complaints & Enquiries Team Manager; Head of Corporate Customer Relations; Head of Housing Partnerships & Service Improvement
3	Process Improvement and Mapping:			
3.1	Develop and implement comprehensive complaint handling process maps.	Apr-25	Sep-25	Director Housing Resident Engagement & Services; Housing Complaints & Enquiries Team Manager
3.2	Introduce clear protocols for extensions with mandatory training by May 2025, ensuring residents are kept informed.	Apr-25	May-25	Director Housing Resident Engagement & Services; Housing Complaints & Enquiries Team Manager; Head of Corporate Customer Relations
4	Early Resolution Focus:			
4.1	Implement guidelines empowering frontline staff to resolve complaints proactively at initial contact.	May-25	Jun-25	Director Housing Resident Engagement & Services; Housing Complaints & Enquiries Team Manager
4.2	Provide ongoing training and monitoring. All complaints handling staff to complete corporate training.	Apr-25	Jul-25	Director Housing Resident Engagement & Services; Head of Corporate Customer Relations
5	Embed Learning from Complaints:			
5.1	Ensure all complaint handlers systematically record learning on iCasework from April 2025.	Apr-25	ongoing	Head of Corporate Customer Relations
5.2	Hold monthly review meetings to identify and disseminate key lessons across the organisation starting May 2025.	May-25	Aug-25	Director Housing Resident Engagement & Services
6	Improve Resident Communication and Satisfaction:			

6.1	Regularly update residents proactively throughout the complaints process, including more use of telephony and the extensions protocol.	Apr-25	ongoing	Director Housing Resident Engagement & Services
6.2	Monitor and respond to feedback from TSM perception measures (TP06, TP07, TP08, TP09).	Apr-25	ongoing	Director Housing Resident Engagement & Services; Head of Housing Partnerships & Service Improvement
7	Enhanced Use of Compensation Guidelines:			
7.1	Standardise and regularly update staff training on compensation guidelines (CHIP training).	Apr-25	May-25	Director Housing Resident Engagement & Services
7.2	Explore implementing a short-term compensation strategy favouring higher-end awards to reduce cases escalating with the Housing Ombudsman.	May-25	Sep-25	Director Housing Resident Engagement & Services; Director Housing Q&I; Head of Repairs; Service Leads
8	Policy and Procedure			
8.1	Complete and agree Reasonable Adjustment Policy.	Apr-25	Sep-25	Director Housing Strategy; Head of Housing Partnerships and Service Improvement
8.2	Complete and agree Knowledge and Information Management Strategy.	Apr-25	Oct-25	Director Housing Strategy; Director Housing Resident Engagement and Services; Head of Housing Partnerships and Service Improvement
8.3	Review, update and agree revised Vulnerability Policy.	Jul-25	Mar-26	Director Housing Strategy; Director Housing Resident Engagement and Services; Head of Housing Partnerships and Service Improvement