

## **The Housing Ombudsman's consultation on 2025-26 Business Plan and 5-year strategy for healthier homes, fairer services and trusting relationships**

Southern Housing is one of the largest housing providers in the UK with around 80,000 homes across London, the South East, the Isle of Wight and the Midlands, giving over 167,000 people somewhere affordable to call their own.

As a registered social housing provider, we're required to be a member of the Housing Ombudsman Scheme. We're pleased to respond to the Ombudsman's consultation on its business plan and new strategy.

### **Response to questions**

#### **Part 1: Corporate Strategy 2025-30**

##### **Strategic objective 1: Provide an excellent, person-centred service**

###### **Q1. How far do you support objective 1 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. neither support nor do not support
4. **support**
5. strongly support

###### **Q2. Do you have any comments or observations on objective 1?**

We welcome the Ombudsman's recognition that services must be person-centred and based on engagement with both residents and landlords.

However, in our experience, in the past we saw the HOS have a stronger focus on a mediation-based approach for all residents, including vulnerable residents. As an independent ombudsman, we know the HOS has balance and impartiality at its heart. We'd like to see this better reflected in the objectives, including an implicit reference to mediation services and other support options as appropriate.

We note that spend on Dispute Support and Resolution has decreased, where spend on all other areas has increased. It's difficult to see how this is compatible with speeding up complaints resolution and providing a person-centric service. We'd like to see this remedied by having an aim on mediation as part of strategic objective one.

We hope that by bringing mediation into focus more in the strategic objectives themselves we'd to see a greater focus on mediation for quick resolution for vulnerable residents.

## **Strategic objective 2: Drive positive local complaint handling cultures**

### **Q3. How far do you support objective 2 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support
5. strongly support

### **Q4. Do you have any comments or observations on objective 2?**

While we do agree the Ombudsman should be driving a positive local complaint handling culture, the objective as drafted doesn't include tackling the 'compensation culture' that has seen some actors seek to exploit the system. The Ombudsman should recognise it has an important role to play in tackling this and appropriately managing residents' expectations around compensation. We're also keen to see an aim that states the HOS will focus on making sure compensation offered is fair and consistent across cases.

## **Strategic objective 3: Support better services through our insights, data, and intelligence**

### **Q5. How far do you support objective 3 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. neither support nor do not support
4. **support**
5. strongly support

### **Q6. Do you have any comments or observations on objective 3?**

As we set out in other comments, a clearer delineation of the role of HOS and the Regulator is required. In strategic objective 3, we'd like to see reference from the HOS in aim 3.3 to a commitment to a reduction in duplication on the part of stakeholders like housing associations, who are providing data to both bodies. Analysis and understanding of intelligence provided by the Ombudsman should also not place any unnecessary additional burden on housing association resources.

We'd also like to see an aim within this strategic objective that sets out that the HOS will share and publish their performance and targets. As we set out in other comments, we're keen for these objectives to support accountability in order to increase trust.

### **Strategic objective 4: Extend our powers and engage with partners to support closing gaps in redress**

#### **Q7. How far do you support objective 4 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support
5. strongly support

#### **Q8. Do you have any comments or observations on objective 4?**

Clearer delineation of the role of HOS and the Regulator is required and objective four would be the natural place for an aim which addresses this.

Regardless of the detailed plans and targets for STAIRS targets, we'd like to see HOS commit within their plan and strategy to a baseline measure of 'effectiveness'.

### **Strategic enabler: Organisation design**

#### **Q9. How far do you support our strategic enabler on a scale of 1 to 5?**

1. strongly do not support
2. **do not support**
3. neither support nor do not support
4. support
5. strongly support

#### **Q10. Do you have any comments or observations on our strategic enablers?**

The HOS organisational design is currently inefficient and negatively affects stakeholders like housing associations. We'd like to see a service improvement plan that details the organisational design element of the strategy to efficiently support delivery of the HOC through the HOS' interactions with housing associations. For example, the HOS portal is not fit for purpose. It creates duplication, where HAs are unable to monitor through it, and its antiquated structure and UX obstructs where it should support change.

### **Key performance indicators and fees**

#### **Q11. How far do you support the KPIs on a scale of 1 to 5, where 1 is 'not support' and 5 is 'fully support'?**

1. strongly do not support
2. **do not support**
3. neither support nor do not support
4. support
5. strongly support

**Q12. Do you have any comments or observations on our KPIs?**

In order to continuously improve and adapt our own service delivery, we believe there needs to be consistency in the Housing Ombudsman's Key Performance Indicators (KPIs) over time. This would allow housing providers to track changes in performance and outcomes, facilitating clearer benchmarking and more productive engagement with the HOS. Understanding how the HOS measures its own performance, especially in relation to resolution times and the volume of complaints, will allow us to better align our practices with your expectations. We believe this transparency and consistency would improve collaboration, accountability and trust.

We commend the HOS for committing to reducing casework timescales (aim 1.2). By the end of the strategy the HOS commits to 99% of cases being determined within 12 months by the end of the strategy period. Firstly, we'd like to see this broken down year-by-year within the strategy period, i.e., for 2029 this would be 98% and so forth. Alongside this, we'd like to see annual progress reports which provide the sector with transparency and demonstrate accountability from the HOS. This would also link into the service improvement plans from the HOS which the sector is keenly awaiting. This is a level of accountability residents and wider stakeholders including policy makers have come to expect in other sectors.

We'd also like to see data published detailing how many cases are over 12 months old.

We recommended that strategic objective three sets out that the HOS will share and publish their performance and targets – this should also be covered more extensively within the KPIs.

We'd also be keen to see the HOS share data on cost per case and publish the fees HAs pay each year for residents and other stakeholders to see.

**Q13. Is anything missing or are there any other observations you would like to make?**

While we acknowledge the need for quick resolutions, we are concerned about the potential for increased case volumes overwhelming the Housing Ombudsman's resources. If the demand for complaints handling continues to rise without proportional resource increases, it could impact the timeliness and quality of resolutions. We would appreciate further clarity on how the Housing Ombudsman plans to manage this increased demand effectively while ensuring timely and thorough case investigations.

Separately, at the appropriate time we look forward to the HOS publishing more detail as to what indicators are being used to demonstrate "an effective STAIRs service from the go-live date", in particular what will make it effective.

## **Part 2: Business Plan 2025-26**

### **Strategic objective 1: Provide an excellent, person-centred service**

**Q14. How far do you support the actions planned in 2025-26 under objective 1 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support
5. strongly support

**Q15. Do you have any comments or observations on objective 1?**

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### **Strategic objective 2: Drive positive local complaint handling cultures**

**Q16. How far do you support the actions planned in 2025-26 under objective 2 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support
5. strongly support

**Q17. Do you have any comments or observations on objective 2?**

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### **Strategic objective 3: Support better services through our insights, data, and intelligence**

**Q18. How far do you support the actions planned in 2025-26 under objective 3 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support

5. strongly support

**Q19. Do you have any comments or observations on objective 3?**

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### **Strategic objective 4: Extend our powers and engage with partners to support closing gaps in redress**

**Q20. How far do you support the actions planned in 2025-26 under objective 4 on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support
5. strongly support

**Q21. Do you have any comments or observations on objective 4?**

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### **Strategic enabler: Organisation design**

**Q22. How far do you support the actions planned in 2025-26 under strategic enablers on a scale of 1 to 5?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support
5. strongly support

**Q23. Do you have any comments or observations on our strategic enablers?**

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### **Key performance indicators and fees**

**Q24. How far do you support the KPIs on a scale of 1 to 5, where 1 is 'not support' and 5 is 'fully support'?**

1. strongly do not support
2. do not support
3. **neither support nor do not support**
4. support
5. strongly support

**Q25. Do you have any comments or observations on our KPIs?**

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**Q26. Is anything missing or are there any other observations you would like to make?**

Our comments relating to the corporate strategy also relate to the business plan. We'd be disappointed at the lack of detail in the 2025-26 business plan. Specifically, there are no timelines or milestones attached to the activities. We'd have liked to see a priority for the year included more empathetically in the document. We'd be happy to comment on the business plan once more detail is provided.

We would like to acknowledge and commend the Housing Ombudsman's (HO's) recent efforts in promoting good complaint-handling practices. The work done to improve awareness around complaints management has been useful for many landlords, including Southern Housing. The creation of resources and training opportunities including through the Centre for Learning has eliminated a layer of interpretation and provided a clearer picture for members of the housing team at all levels to understand the expectations on them.

This best practice guidance is helpful, but it must remain precisely that – guidance. We understand that within the sector there is some confusion around the extent to which the HO's determinations and actions are to be interpreted as policy, which can lead to inconsistencies in how complaints are handled.

We believe there needs to be a more defined separation between the roles and responsibilities of the HO and the Regulator for Social Housing (RSH). Clearer boundaries would enable us to better understand the scope and limitations of the HO's remit and prevent overlapping regulatory frameworks that could impact our operational effectiveness. The Corporate Strategy should incorporate more detail on this separation of roles and responsibilities, not only to reassure itself and housing associations of where its limits lie, but also so residents understand how the HO and RSH differ now that there are consumer standards in force.

On fees, we are cognisant of the increase in costs faced by the HOS. However, we also believe more restraint is needed in fee-setting given that our costs come from residents. For a large HA, fees of over half a million pounds – amongst the worst financial operating environment the sector has faced – puts us in a difficult position. We'd be keen to see the introduction of technologically enabled triaging for cases in order to manage expectations of residents, and also to cut down on more resource-intensive activities that entail once a case enters the HOS system. We'd hope this would cut down on costs

through greater efficiency, but also improve the customer experience for residents going to the HO. We'd therefore be keen to see an objective on providing value for money and driving efficiency, or at the least a more emphatic acknowledgement of these aims within the 'organisation design strategic enabler'.