Solihull Community Housing
Shaping our neighbourhoods

# Annual Complaints Performance & Service Improvement Report

**May 2025**

Solihull Metropolitan Borough Council
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## 1. Introduction

Last year we reflected on the challenging times ahead for all social housing landlords with the introduction of new and exciting legislation and regulation.

As the year has progressed we have been reassured as the Members Responsible for Complaints by the approach Solihull Metropolitan Borough Council (SMBC) and Solihull Community Housing (SCH) have taken in relation to the introduction of the Housing Ombudsman Code.

We are again delighted to introduce the Complaints Annual Report and Service Improvement Plan. We have worked directly with officers and tenants to understand our performance in managing complaints and we have carried out a Self-Assessment to understand the progress SCH have made against compliance with The Code, more details of this can be found in the report.

The progression to creating a centralised complaints team is a triumph for complaint handling and we expect to see the impact of the new team across the 2025/2026 performance year.

That said, 2024/2025 didn't come without its challenges; the increase in complaint volumes meant we struggled to achieve our goal for timeliness in relation to complaint handling and the escalation of complaints increased. We have always maintained that complaint volumes are a good indicator that customers can and do complain, which is hugely important to any landlord.

We are committed to ensuring a positive complaints culture exists throughout SCH, in which we listen to our customers and learn from their experiences. Learning from complaints and making service improvements as a result of them is one of the most important parts of the complaints handling process. This report contains examples of how SCH have learned from complaints. We will work with officers and customers over the coming year to continue to learn from complaints and make improvements to the way we deliver services.

It is good to see that there has been an honest and open assessment of the complaints service provided by SCH against The Code which has resulted in agreed actions to improve our performance and ensure we remain compliant with The Code. Complaint volumes are increasing year on year throughout the sector, we anticipate this trend will continue as we encourage customers to tell us when they think we have done something wrong. We are committed to having meaningful oversight of complaints and we will be monitoring the service improvement plan over the coming months to ensure we make the improvements needed to deliver great services and put things right quickly if things don't quite go to plan.

Regards,

**Councillor Mark Parker – Cabinet Member for Housing, SMBC**

**Susan Buckley - Tenant Board Member, SCH**

**On behalf of SMBC and The SCH Board**

## 2. Complaint handling performance

### 2.1 Managing complaints

**Our performance**

Overall **77.5%** of complaints have been completed on time. This is an increase of 7.1% compared to last year.

Our ambition was to achieve 85% on time, meaning we were 7.5% below our target.

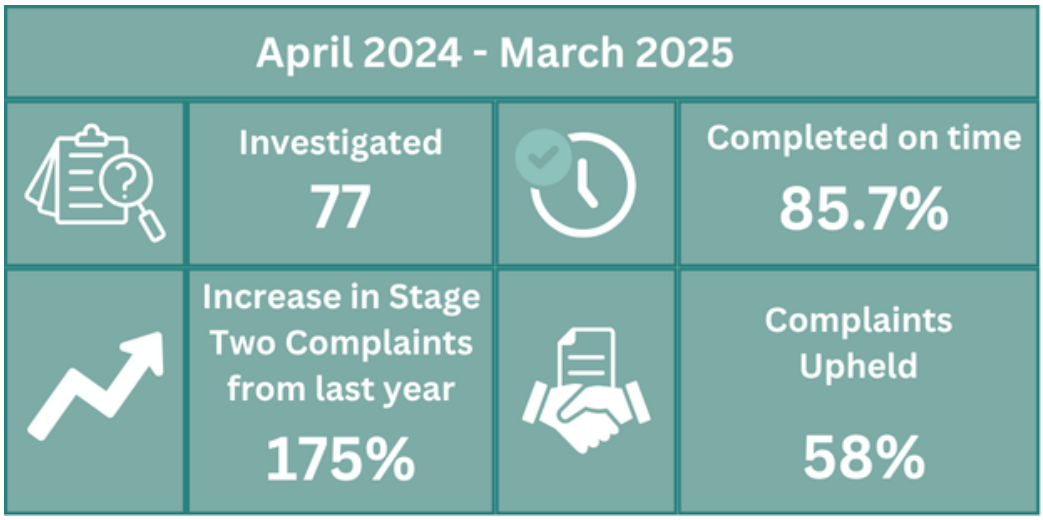
**Stage 1 Overview**

| Stage 1 | Volume Logged | Volume Refused | Volume Cancelled by Customer | Volume Investigated | On time | % On Time | Late | Upheld | Not Upheld |
|---|---|---|---|---|---|---|---|---|---|
| **2024-25** | **651** | **59** | **19** | **573** | **438** | **76.4** | **135** | **336** | **237** |
| 2023/24 | 485 | 6 | 22 | **457** | 314 | 68.7 | 143 | 254 | 203 |

| Stage 1 | Volume | On time | Late | Upheld | Not Upheld |
|---|---|---|---|---|---|
| **Tenant** | 420 | 309 | 111 | 250 | 170 |
| **Non-tenant*** | 153 | 129 | 24 | 86 | 67 |

*includes leaseholders, homeless or housing register applicants and other complaints that are not SCH tenants

## Stage 2 Overview




| Stage 2 | Volume Investigated | On time | Late | Upheld | Not Upheld |
|---|---|---|---|---|---|
| **2024/25** | **77** | 66 | 11 | 45 | 32 |
| **2023/24** | **28** | 96.4 | 1 | 24 | 4 |

| Stage 2 | Volume | On time | Late | Upheld | Not Upheld |
|---|---|---|---|---|---|
| **Tenant** | 53 | 45 | 8 | 35 | 18 |
| **Non-tenant** | 24 | 21 | 3 | 10 | 14 |

### Improving our complaints handling performance

Throughout 2024/2025 we ran a pilot for centralising complaints which demonstrated that by having a dedicated staff member doing the role of complaint handler there was an improvement in timeliness of complaint handling and satisfaction with the complaints they handled. Therefore the SCHape tenant panel recommended that this pilot progressed into an operating model for SCH. As of March 2025 the centralised complaint team was formed with a focus on Stage 1 complaint handling, the focus of the team is to:

- Improve time taken to resolve the complaint
- Improve the quality of investigation
- Improve communication with customers during and at the end of the investigation

**Volume of complaints**

**Stage 1**

We have seen an increase in complaint volumes of 25% in comparison to the previous year. This is expected due to the increase in awareness and ease of access to the complaints process. We can be confident that customers know they have the right to complain and how to complain.

**Stage 2**

There has been a significant increase in stage 2 complaints. There are a number of drivers. Customers are now more informed about their right to escalate, and this is promoted to all complainants.

Due to the increase in volumes at stage 1, there were examples when the quality of investigation and response was not up to our usual high standards. Operational staff could, on occasion struggle to balance complaint investigations with the day-to-day roles. This resulted in some additional cases moving to stage 2. We have acknowledged this challenge and the implementation of the centralised team, will positively impact on the quality of investigations. This will improve the customer experience and hopefully reduce the number of complaints moving to stage 2.

This year's volume of stage 2 complaints is now in line with the sector average.

## 2.2 Comparing our performance

One of the best ways SCH and SMBC can monitor our performance with complaints is to compare our performance across the social housing sector. Tenant Satisfaction Measures (TSM's) allow us to do this as they are a regulatory requirement, and therefore consistently reported across the sector to allow us to benchmark against peers. The Regulator of Social Housing publishes a TSM annual report and we can compare our results with all other social housing providers*

**Headlines**

- Whilst performance is improving, SCH is below the national average on resolving complaints on time for both stage 1 and stage 2 complaints
- Satisfaction with complaints handling is above the national average
- Volumes of complaints are close to the housing sector average

| Key performance indicators* | Bottom 25% performance | National average | Top 25% performers | SCH 2023/2024 | **SCH 2024/2025** |
|---|---|---|---|---|---|
| Stage 1 (TSM) complaints completed in target timescale | 64.6% | 82.3% | 92.9 | 70.34% | **76.4%** |
| Stage 2 (TSM) complaints completed in target timescale | 64% | 88.6 | 97.8% | 95% | **85.7%** |
| Satisfaction with complaints handling | 28 | 35% | 41% | 34.25% | **37.84%** |
| Stage 1 complaints per 1,000 properties | | 41.60 | | 38.72 | **43.02** |
| Stage 2 complaints per 1,000 properties | | 5.33 | | 2.03 | **5.43** |

Please note that this only includes complaints where the complainant has a tenant relationship with SCH/SMBC.

Note that this is compared against last year's benchmarking, as this year has not yet been released.

### 2.3 Complaints by service area

To help us understand why customers complain we consider the complaints by service area, below is an overview of the service areas complaints relate to:

| Service Area | 2024/2025 | 2023/2024 | Percentage increase/decrease |
|---|---|---|---|
| Responsive Repairs & Voids – Repairs | 193 | 140 | +38% |
| Neighbourhood Services – Antisocial Behaviour, Estate management | 106 | 65 | +63% |
| Homeless Service /Allocations – Housing register | 87 | 86 | +1% |
| Compliance – Gas, Electrical and other compliance areas repairs and servicing | 81 | 61 | +33 |
| Rent accounting and arrears /Right To Buy/Leasehold | 24 | 11 | +18% |
| Customer Services | 20 | 14 | +43% |
| Capital – Planned improvement works | 20 | 20 | 0% |
| Occupational Therapy & Aids and Adaptations | 20 | 23 | -13% |
| Pest control | 10 | 11 | -9% |

| | | | |
|---|---|---|---|
| Cross Cutting – multiple service areas involved | 9 | 2 | +350% |
| Engagement | 1 | 2 | -50% |
| Out of Hours | 1 | 1 | 0% |
| Wellbeing service | 1 | 0 | +100% |
| Development | 0 | 1 | -100% |

Understanding the service areas that complaints relate to helps us focus our efforts when considering service improvement. In 2024/2025, due to the increased number of complaints overall, we would expect an increase across the service areas. Those with a larger percentage increase include:

**Repairs**

This year our repairs team completed 35,807 repairs. This is our largest area of transaction with customers, so it is not unexpected that it was also the highest in terms of complaints. Where complaints have been received, we know that a key driver is communication. As a result, the SCHape panel have undertaken a review, further detail can be found in section 3.

**Neighbourhoods**

We have seen an increase in the number of complaints about communal cleaning during this year. The resident SCHape panel carried out a review and recommended we change contractor. This has now been actioned, and we have started to see a decrease in complaints and a significant increase in satisfaction via the TSM survey.

**Customer Service**

It is disappointing to see an increase. There is no pattern to the complaints received, and it has coincided with an increase in customer satisfaction. We recognise that our call wait time has increased, which can be a source of frustration for customers. We are working on a transformation project that will improve our digital and telephony offer.

## 2.4 Complaints by demographics

Appendix A provides detailed information on the demographics of complainants compared to the general population.

**Highlights**

- The ethnicity of complainants is broadly in line with the general population.
- A slightly higher proportion of women make a complaint compared to the general population, but statistically, is not significant
- A higher proportion of younger customers make a complaint, compared to older customers. This is in line with what organisation both inside and outside of the housing sector experience, and is generally linked to higher expectations of younger customers

- A higher proportion of residents with a vulnerability make a complaint, compared to customers who do not have a vulnerability. The difference is statistically significant. We can see that the majority of the complainants with a vulnerability have told us they have a mental health illness or difficulty.

**Next steps**

- SCH will be monitoring demographic information on a monthly basis, as part of the operational dashboard, and will be reporting in quarterly to Housing Operations committee and QMB
- More in depth analysis of the data is currently being undertaken to understand the key drivers
- Over the next six months, Follow-up surveys and customer journey mapping will be undertaken with complainants with a vulnerability to understand key drivers in more detail
- The Complaints Manager will be undertaking deep dive audits of a sample of complaints made by vulnerable residents
- The results from the additional analysis, audits, surveys and customer journey mapping will be reported to Board and QMB later in the year.

## 2.5 Customer Satisfaction

We measure customer satisfaction in two ways. Via the TSM survey of residents and through monthly satisfaction calls to residents which have closed a complaint with us. During 2024/25 Acuity, our external provider, completed 48 survey calls. The response rate was very low so percentages should be viewed with caution. Low response rates appear to be a trend across the sector.

Highlights

- Overall satisfaction in both the TSM and transactional surveys is similar, and above the national housing sector average
- There has been a decrease in overall satisfaction compared to last year
- Ease of reporting remains high – which reflects the improvement works made by SCH in the promotion and accessibility of the complaints process.
- Particular improvements need to be made to the way in which we keep customers informed

TSM results:

| Key performance indicator | Bottom 25% performance | National average | Top 25% performers | SCH 2023/2024 | **SCH 2024/2025** |
|---|---|---|---|---|---|
| Satisfaction with complaints handling | 28 | 35% | 41% | 34.25% | **37.84%** |

Transactional results for 2024/25:

| Question | 2024/25 | 2023/24 |
|---|---|---|
| Ease of reporting | 69% | 68% |
| How quickly SCH made contact | 60% | 61% |
| Officer was helpful, knowledgeable and professional | 52% | 60% |
| Kept informed on progress of complaint | 36% | 45% |
| Satisfaction with response, explaining the results of our investigation | 36% | 45% |
| Satisfaction with response, in terms of understanding the outcome | 48% | 43% |
| Satisfaction with final outcome | 29% | 39% |
| Satisfaction SCH were easy to deal with | 43% | 45% |
| Overall satisfaction with complaint handling | 35% | 46% |

**What are we doing as a result of the surveys?**

**Centralised team**

Throughout 2024/2025 we ran a pilot for centralising complaints which demonstrated that by having a dedicated staff member doing the role of complaint handler there was an improvement in timeliness of complaint handling and satisfaction with the complaints they handled. Therefore, the SCHape tenant panel recommended that this pilot progressed into an operating model for SCH. As of March 2025, the centralised complaint team was formed with a focus on Stage 1 complaint handling, the focus of the team is to

- Improve the quality of investigation
- Improve communication with customers during and at the end of the investigation
- Improve time taken to resolve the complaint

The focus of the Service improvement plan is timeliness of complaint handling, along with improved customer satisfaction when complaining.

**Survey**

We are reviewing the way we carry out the survey with the aim of increasing response rates, which will give us better insights.

## 2.6 Refusals

There are occasions when we will refuse to accept and investigate complaints. Our policy clearly sets out the reasons we would do this. During 2024/2025 we have refused 59 complaints, the top 3 reasons have been

- Not a service delivered by SCH
- Review or appeal route available
- Service Request

Most refusals have occurred when the online complaint form has been used to submit a complaint, therefore we are reviewing the form to ensure it supports customers.

## 3. Service Improvements and Learning

Learning from complaints and making improvements as a result of them is one of the most important and valuable parts of the complaints process. Below we aim to show some of the key learning from our Stage 1, Stage 2 and Housing Ombudsman Complaints.

Learning can be individual or a theme across the business, wherever we find learning we share it with Service areas and support them to make changes where needed. Sometimes individual complaints lead to specific changes to policies or the way we work.

Below is a view of learning from the 2024/2025 performance year:

| Individual learning from Stage 1 and 2 complaints | | |
|---|---|---|
| **What went wrong?** | **What did we learn?** | **What did we change?** |
| Advice not given to customer earlier enough regarding insurance process | Referrals to SMBC insurance team aren't always completed | Updated training for complaint handlers to ensure understanding of the role of the insurance process for customers |
| Delayed Roof Repairs and customers unaware of time frames | Roof & scaffolding process needed | Introduced a process to track these type of repairs and keep customers informed |
| Stage 1 complaint did not consider appropriate remedy | Improved training needed for complaint handlers | Introduction of centralised complaints team |
| Customer passed between SMBC and SCH regarding an Accident report | Unnecessary delays caused to customer due to poor process between teams | Training to staff and joint working with SMBC to avoid in the future |
| Officer absence meant delays for customer | Cover is required for key and active cases | Buddy system created and implemented |
| Leak from above process | When the property where the suspected leak is coming from is not in, the job is closed (as no access), this means the issue continues | Process changed to ensure jobs not closed until leak resolved. |
| Learning from HOS determinations (see section 6) | | |
| **What went wrong?** | **What did we learn?** | **What did we change?** |
| Complaint handling failures | Management of complaint investigation alongside daily duties meant timeliness and quality of response negatively impacted complaint handling | Pilot for centralised complaint team, leading to review from SCHape panel and implementation of new team. |

| | | |
|---|---|---|
| Antisocial Behaviour (ASB) Policy not followed | Our policy wasn't clear on how we handle serious ASB | Amended the policy to offer clarity to customers |
| Delayed roof repairs and mishandling of leak reports | Our process for roof leaks and the requirement of scaffolding wasn't documented | Process created and great visibility to staff regarding works |
| No response to customer regarding staff conduct | When an issue is raised by a customer regarding a staff member, the customer should receive a response regardless of alternative processes underway | Review of approach to such comments and review of unreasonable communications policy |

### 3.1 Themes

When reviewing the cause of complaints, we can often categorise the key reasons, below are the standout reasons for complaints. It is helpful to identify these themes as it allows us to consider service improvement for the future. Below respond to them.

| Key themes | SCH response |
|---|---|
| *Follow on works* – Repairs, inspections and visits often result in follow on works. We have identified that customers are not kept updated regarding the next steps and have to contact SCH to find out what is happening. | The SCHape panel have recently undertaken a review of the Repairs service as mentioned in section 2.3 of this report. With repairs being the largest service area in SCH we recognise that they will attract more complaints, however the themes identified in this years annual report are similar to those in the previous annual report with a key focus on communication. The review is progress, and we now enter a period of implementation and change. We'll continue to report on the learning from complaints on our website, please visit for up to date information. |
| *Communication* – The way we communicate with customers about the repairs service isn't consistent. | |
| *Communication*- customer complains they don't always receive appropriate updates on their complaint. | The introduction of the centralised complaints team aims to improve performance and communication of complaint handling. Our Service Improvement plan will also consider what actions we need to take beyond the requirements of the Self Assessment, such as being 'winter ready' and enhancing how we interact with customers after our first visit. |
| *Seasonal Demand* – Complaint volumes increased in the winter period, along with an increase on service areas such as repairs and compliance. | |

**An update from last year….**

Last year our Annual report identified that effective communication, record keeping and supporting tenants with additional needs could be improved. As a result, we reviewed our centralised system for record keeping, began our journey of transformation of case management for complaints and updated our complaints process. We advised that we were trialling the centralisation of complaints, this has now resulted in the creation of a centralised complaints team.

SCH also recognised that more could be done to support customers and their individual needs, as a result the 'Everyone Matters' project was developed, which looked to increase our understanding of customers' needs, and strengthen our approach to tailoring services to meet those needs. System, process and training improvements are underway.

## 4. Housing ombudsman

### 4.1 Determinations

The Housing Ombudsman Service (HOS) investigate complaints when a tenant escalates their concerns to them after receiving a Stage 2 outcome. When investigating a complaint the Ombudsman can consider 8 possible findings:

- **No maladministration** – Where the landlord acted in accordance with its obligations in the tenancy agreement and relevant policies and procedures. Minor failings may have been found but these have caused no detriment to the resident.
- **Service failure** – Where there is evidence of a minor failing but action is still needed to put things right. Service failure is a form of maladministration.
- **Maladministration** – Where there was a failure which has adversely affected the resident.
- **Severe maladministration** – The most serious failure, where there is evidence of serious detrimental impact to the resident.
- **Resolved with intervention** - Where the resident and landlord have agreed to enter into mediation and, with the Ombudsman's intervention, reached an agreed outcome which resolves the complaint satisfactorily.
- **Redress** - There is evidence of maladministration, but the landlord has identified and acknowledged this prior to the Ombudsman's investigation and has, on its own initiative, taken steps that puts things right.

In addition:

- **Outside jurisdiction** - The complaint will not or cannot be considered by the Ombudsman.
- **Withdrawn** - The resident withdrew their complaint and the Ombudsman is satisfied as to the circumstances.

SCH received 5 case outcomes from HOS throughout the performance year, 4 resulted in a determination where maladministration was found, 1 case was not accepted by the Ombudsman.

With regards to the HOS cases, they made 16 findings. This was made up of, 7 maladministration's, 1 service failure and 8 findings of no maladministration across the 4 cases. This is therefore a maladministration rate of 57%.

Maladministration and fault was found within complaint handling, handling of ASB and handling of reports of repairs.

SCH review all cases in detail, responding to the orders issued by the Ombudsman as well as reflecting on the learning identified. We accept that we don't always get it right and take the opportunity to consider the feedback.

### 4.2 Ombudsman Reports

The Housing Ombudsman Service previously issued spotlight reports, in January 2025 they followed up the Knowledge and Information Management report where they evaluate their report and reflect how landlords have implemented some of the recommendations. SCH have reviewed this in line with the self-assessment against the original report and continue to work on the requirements. This report was considered in the development of our Knowledge, Information and Data Management Strategy.

From April 2024 the Housing Ombudsman has issued a monthly 'Learning from severe maladministration' report which shares learning from complaints across the sector.

Annually the Housing Ombudsman Service also generate reports for Landlords whereby there have been 5 of more findings of maladministration or service failure in the previous performance year. A report was issued for Solihull Metropolitan Borough Council (SMBC) in October 2024, reflecting the performance of 2023/2024 (which we reported on in our previous annual report). Here is a link to the webpage where you can search for the report Landlords Archive - Housing Ombudsman

Key notes from the report:

- 67% Maladministration rate – this was identified as performing similarly when compared to other landlords, the national maladministration rate was 73%. There were 9 findings, of which 6 were maladministration in the 2023/2024 performance year.
- By category 'Property Condition' was the highest cause of findings
- Compensation was the highest type of 'order' received by SMBC

SCH take steps to review and disseminate the information from reports and insights issued by both Ombudsman services as we strive to improve service delivery.

## 5. Self-Assessment

As part of it's legal duty to monitor landlord compliance with The Complaint Handling Code the Housing Ombudsman have instructed landlords to submit a self-assessment annually. The Self Assessment is an opportunity for SCH and SMBC to reflect on our current approach, ensure we comply with the Code and take forward any opportunities to improve service delivery.

Appendix A in this report is the new Self Assessment SCH and SMBC have completed against the new Complaint Handling Code.

In summary, the self-assessment is split into 7 sections and there are 73 points that SCH and SMBC must comply with. There is 1 point where SCH and SMBC need to make some improvements to be compliant. This is an improvement on last year where we shared that we had 7 points of none compliance, we worked on the service improvement plan last year and achieved :

- An improved process for record keeping regarding complaints
- Created a report to reflect agreed actions and remedies during complaint handling so they could be tracked to completion
- Created the centralised complaints team, a demonstration of a positive complaints culture
- Enhanced our reporting to customers and committees with plans to do more in the future
- Reviewed the staff objective in relation to complaints

Our Self-Assessment will be published on our website and available in other formats upon request.

## 6. Service Improvement Plan

SCH have developed a Service Improvement Plan (SIP) for complaints that encompasses the opportunities identified in the Self Assessment (appendix A)

The Service Improvement plan will be maintained and overseen by Head of Customer Experience, all service areas within SCH will be involved in the delivery and success of the SIP.

The Housing Ombudsman require Landlords to create and publish the SIP as part of the oversight and scrutiny required by the Complaint Handling Code.

| Code/ SA ref | Action Title | Action Detail | Resolution | Target Date |
|---|---|---|---|---|
| 6.3 | Complaint Timescales | Customers should receive a response to their complaint within the timelines of the Housing Ombudsman Code | Ensure compliance with the timeliness of complaints | March 2026 |
| - | Satisfaction | Improve customer satisfaction with regards to complaint handling, increase the feedback received | Consider how feedback is requested, enhance complaint handling experience with new complaint handling team | March 2026 |
| | Communication | Identify key areas where customers are frustrated by lack of communication | Work with appropriate service areas to enhance customer communication | September 2025 |
| - | Winter Ready | Review factors that contribute to stretch in service delivery and plan for such demand | Create Winter Ready plan to support key service areas during heightened demand | September 2025 |

**There is lots of information relating to complaints on the SCH website.**

**This QR code will take you to the complaints hub.**

**This QR code will take you to make a complaint.**

**If you would like to contact the Housing Ombudsman, you can do so in a number of ways:**

PO Box 1484
Unit D
Preston
PR2 0ET

Call us on 0300 111 3000

www.housing-ombudsman.org.uk/residents/make-a-complaint/

**Are you interested in working with us to review, monitor and improve the way we deal with complaints?**

We are looking for residents to get involved in a number of activities such as:

- Complaints reviewers
- SCHape Residents Panel
- Complaints advocates
- Virtual Improvement Panel

**If you are interested in getting involved please contact the engagement team at engagement@solihullcommunityhousing.org.uk**

This report has been approved by the SCHape Residents Panel

SCHAPE
Residents Panel
Solihull Community Housing
Achieving Performance Excellence

If you would like this report in any other format or language please contact us here:
Or telephone us on
0121 717 1515

## Appendix B: Self-assessment form

This self-assessment form should be completed by the complaints officer, and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this. Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

## Section 1: Definition of a complaint

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 1.2 | A complaint must be defined as:<br>*'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'* | Yes | Complaints Policy | |
| 1.3 | A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy. | Yes | Internal communications to staff<br>Complaints Training<br>Contact Centre guides | |
| 1.4 | Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be | Yes | Complaints Policy<br>Operational Performance<br>Operational Dashboards<br>Data Strategy | |

| | | | | |
|---|---|---|---|---|
| | recorded, monitored and reviewed regularly. | | | |
| 1.5 | A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains. | Yes | Complaints Policy | |
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain. | Yes | Independent company undertake customer satisfaction surveys, they advise how the customer can complain<br>Any reports of dissatisfaction are shared with SCH and appropriate action taken | |

## Section 2: Exclusions

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 2.1 | Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits | Yes | Complaints Policy | |
| 2.2 | A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:<br>• The issue giving rise to the complaint occurred over twelve months ago.<br>• Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court.<br>• Matters that have previously been considered under the complaints policy. | Yes | Complaints Policy | |
| 2.3 | Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider | Yes | Complaints Policy | Complaints process for staff Script review/change |

| | | | | |
|---|---|---|---|---|
| | whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so. | | | |
| 2.4 | If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint. | Yes | Complaints Policy<br>Managed by the centralised Customer Feedback Team | |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Yes | Complaints Policy | |

## Section 3: Accessibility and Awareness

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 3.1 | Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process. | Yes | Complaints Policy<br><br>Reasonable-Adjustments-Policy-for-Customer-Complaints.pdf (solihullcommunityhousing.org.uk) | |
| 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. | Yes | Complaints Training<br>Internal Communication to staff<br>Internal complaints guidance for staff | |
| 3.3 | High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain. | Yes | SCH performance monitor complaints, however complaint volumes are not rated red, amber or green. | |

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| 3.4 | Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website. | Yes | Complaints Policy<br><br>Service-Standards-April-2024.pdf (solihullcommunityhousing.org.uk)<br>Policy available in different languages on request<br>Policy can be downloaded, posted | |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code. | Yes | Complaints Policy | |
| 3.6 | Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord. | Yes | Complaints Policy<br>Contact Centre Guides<br>Online complaint submission form<br>Complaint Handling Training | |
| 3.7 | Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint. | Yes | Complaints Policy<br>Complaint Handling Training<br>Internal complaints guidance for staff | |

## Section 4: Complaint Handling Staff

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 4.1 | Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties. | Yes | Customer Feedback Team | |
| 4.2 | The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly. | Yes | Customer Feedback Team & new centralised team for Complaint handling | |
| 4.3 | Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively | Yes | Complaints Training<br>Internal staff communication – Core Brief | |

## Section 5: The Complaint Handling Process

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 5.1 | Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain. | Yes | Complaints Policy | |
| 5.2 | The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion. | Yes | Complaints Policy | |
| 5.3 | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman. | Yes | Complaints Policy | |
| 5.4 | Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be | Yes | Internal complaints guidance for staff | |

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| | expected to go through two complaints processes. | | | |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code. | Yes | SCH staff investigate complaints about contractors or third parties in line with our complaints policy, process and procedures | |
| 5.6 | When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification. | Yes | Letter Templates<br>Acknowledgement letters are sent from the centralised Customer Feedback Team to ensure consistency | |
| 5.7 | When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear. | Yes | Letter Templates<br>Acknowledgement letters are sent from the centralised Customer Feedback Team to ensure consistency | |
| 5.8 | At each stage of the complaints process, complaint handlers must:<br>a. deal with complaints on their merits, act independently, and have an open mind;<br>b. give the resident a fair chance to set out their position; | Yes | Complaint Handling Training<br>Internal Complaints guidance for staff<br>New centralised Complaints Team | |

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| | c. take measures to address any actual or perceived conflict of interest; and<br>d. consider all relevant information and evidence carefully. | | | |
| 5.9 | Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint. | Yes | Complaints Policy<br>Complaints Training<br>Internal Complaints guidance for staff | |
| 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. | Yes | Complaints Policy<br>Reasonable-Adjustments-Policy-for-Customer-Complaints.pdf (solihullcommunityhousing.org.uk)<br><br>Complaints Training<br>Internal Complaints guidance for staff<br>Acknowledgement Letter template<br>Complaints case management system logs adjustments<br>Our Inclusive Services Register is now live! - Solihull Community Housing | |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must | Yes | Complaint are monitored centrally and decisions to refuse or accept a complaint made centrally, monitored and authorised by the | |

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| | clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code. | | Complaints Manager to ensure consistency and compliance with the code. See 2.4 | |
| 5.12 | A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys. | Yes | Complaint Handling Training<br>Centralised repository for documents<br>Case Management notes | |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation. | Yes | Complaints Policy<br>Internal Complaints guidance for staff<br>Complaint Handling Training | |
| 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. | Yes | SCH-Unreasonable-Communication-Policy-2024.pdf (solihullcommunityhousing.org.uk) | |

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| 5.15 | Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010. | Yes | SCH-Unreasonable-Communication-Policy-2024.pdf (solihullcommunityhousing.org.uk) | |

## Section 6: Complaints Stages

**Stage 1**

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 6.1 | Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident. | Yes | Complaints Policy<br>Internal Complaints guidance for staff<br>Complaint Handling Training | |
| 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**. | Yes | Complaints Policy | |
| 6.3 | Landlords must issue a full response to stage 1 complaints **within 10 working days** of the complaint being acknowledged. | No | Complaints Policy | The SCH policy and processes are committed to a 10 day turn around for complaints, however this hasn't been achieved 100% of the time. Complaint handling timescales have improved year on year, with |

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| | | | | the introduction of a centralised team the aim is for further improvement in 25/26. |
| 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. | Yes | Complaints Policy<br>Internal Complaints guidance for staff<br>Complaint Handling Training | |
| 6.5 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. | Yes | Complaints Policy<br>Internal Complaints guidance for staff<br>Complaint Handling Training | |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident. | Yes | Complaints Policy<br><br>Internal complaints guidance for staff<br>Complaints Handling Training<br>Introduction of Complaint closure form to track actions and remedies | . |
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, | Yes | Internal Complaints guidance for staff<br>Complaint Handling Training<br>Letter Templates | |

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| | referencing the relevant policy, law and good practice where appropriate. | | | |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Yes | Internal Complaints guidance for staff<br>Complaint Handling Training | |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right;<br>f. details of any outstanding actions; and<br>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. | Yes | Internal complaints guidance for staff<br>Letter Templates | |

**Stage 2**

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 6.10 | If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response. | Yes | Complaints Policy<br>Internal complaint guidance for staff | |
| 6.11 | Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received. | Yes | Complaints Policy<br>Internal complaint guidance for staff<br>Complaint Handling Training | |
| 6.12 | Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response. | Yes | Stage 1 letter template<br>Internal Complaints guidance for staff<br>Complaints Handling Training | |
| 6.13 | The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1. | Yes | Complaints Policy | |
| 6.14 | Landlords must issue a final response to the stage 2 **within 20 working days** of the complaint being acknowledged. | Yes | Complaints Policy | |
| 6.15 | Landlords must decide whether an extension to this timescale is needed when considering the complexity of the | Yes | Complaints Policy | |

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| | 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 the reason(s) must be clearly explained to the resident. | | | |
| 6.16 | When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman. | Yes | Complaints Policy<br>Internal complaints guidance for staff<br>Complaint Handling Training | |
| 6.17 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident. | Yes | Complaints Policy<br>Internal complaints guidance for staff<br>Complaint Handling Training | |
| 6.18 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. | Yes | Letter Templates<br>Internal complaints guidance for staff<br>Complaint handling training | |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:<br>a. the complaint stage;<br>b. the complaint definition;<br>c. the decision on the complaint;<br>d. the reasons for any decisions made;<br>e. the details of any remedy offered to put things right; | Yes | Internal Complaints guidance for staff<br>Complaint Handling Training<br>Letter Templates | |

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| | f. details of any outstanding actions; and<br>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. | | | |
| 6.20 | Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response. | Yes | Complaints Policy | |

## Section 7: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 7.1 | Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:<br>• Apologising;<br>• Acknowledging where things have gone wrong;<br>• Providing an explanation, assistance or reasons;<br>• Taking action if there has been delay;<br>• Reconsidering or changing a decision;<br>• Amending a record or adding a correction or addendum;<br>• Providing a financial remedy; | Yes | Internal complaint guidance for staff<br>Complaint Handling Training | |

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| | • Changing policies, procedures or practices. | | | |
| 7.2 | Any remedy offered must reflect the impact on the resident as a result of any fault identified. | Yes | SCH-Remedies-Policy-March-2024.pdf (solihullcommunityhousing.org.uk)<br>Internal complaints guidance for staff<br>Complaint Handling Training | |
| 7.3 | The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion. | Yes | Letter templates<br>Internal complaints guidance for staff<br>Complaint Handling Training<br>Introduction of Complaint closure form to track actions and remedies | |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Yes | SCH-Remedies-Policy-March-2024.pdf (solihullcommunityhousing.org.uk) | |

## Section 8: Putting things right

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 8.1 | Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:<br>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.<br>a. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;<br>c. any findings of non-compliance with this Code by the Ombudsman;<br>c. the service improvements made as a result of the learning from complaints;<br>e. any annual report about the landlord's performance from the Ombudsman; and<br>e. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. | Yes | This report provides the evidence<br>Complaints - Solihull Community Housing | |

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| 8.2 | The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this. | Yes | This report provides the evidence Complaints - Solihull Community Housing | |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures. | Yes | | |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation. | Yes | | |
| 8.5 | If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code. | Yes | Subsidiary Business Continuity Plan | |

## Section 9: Scrutiny & oversight: continuous learning and improvement

| Code provision | Code requirement | Comply: Yes / No | Evidence | Commentary / explanation |
|---|---|---|---|---|
| 9.1 | Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint. | Yes | Complaint Handling Training<br>Internal complaints guidance for staff | |
| 9.2 | A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery. | Yes | Complaints learning used to improve service delivery, Customer Experience Strategy launched with key focus on complaints and Voice of the Customer Framework introduced with Complaint feedback a key feature | |
| 9.3 | Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees. | Yes | Board Champion for Complaints meetings<br>Board champion for complaints is a member of the tenants SHAPE panel<br>Complaints reporting issued quarterly to board<br>Complaint reporting issued quarterly on the website | |
| 9.4 | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, | Yes | Head of Customer Experience, with responsibility for SCHape Panel Reviews, receives regular updates on Ombudsman | |

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| | serious risks, or policies and procedures that require revision. | | decisions and actions arising as well as learning from complaints | |
| 9.5 | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). | Yes | Susan Buckley- Board Complaint champion<br>Councillor Parker | |
| 9.6 | The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings. | Yes | MRC role and activities will be defined and planned throughout the year | |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;<br>a. regular reviews of issues and trends arising from complaint handling;<br>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with | Yes | These elements will be considered within the role of the MRC's and the activities with SCH and SMBC | |

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| | orders related to severe maladministration findings; and<br>c. annual complaints performance and service improvement report. | | | |
| 9.8 | Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:<br>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;<br>a. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and<br>c. act within the professional standards for engaging with complaints as set by any relevant professional body. | Yes | Mandatory staff objective in place | |

## Appendix B

### Stage 1 complaints

| Gender | SCH Population | Count | Percentage |
|---|---|---|---|
| Female | 63.0% | 385 | 67.2% |
| Male | 37.0% | 188 | 32.8% |
| other | 0.0% | 0 | 0.0% |
| Total | 100.0% | 573 | 100.0% |

| Vulnerability/vulnerabilities | SCH Population | Count | Percentage |
|---|---|---|---|
| No | 64.6% | 331 | 57.8% |
| Yes | 35.3% | 242 | 42.2% |

| Ethnicity | SCH Population | Count | Percentage |
|---|---|---|---|
| White | 81.4% | 376 | 65.6% |
| Black, Black British, Caribbean or African | 3.5% | 24 | 4.2% |
| Mixed or multiple ethnic groups | 2.8% | 17 | 3.0% |
| Asian or Asian British | 1.8% | 8 | 1.4% |
| Other ethnic group | 0.6% | 6 | 1.0% |
| | | | |
| Chose Not To Specify | 1.3% | 13 | 2.3% |
| Unknown | 8.5% | 129 | 22.5% |
| Total | 100.0% | 573 | 100.0% |

| Age Bracket | SCH Population | Count | Percentage |
|---|---|---|---|
| 0-20 | 0.9% | 3 | 0.5% |
| 21-30 | 9.9% | 76 | 13.3% |
| 31-40 | 18.9% | 162 | 28.3% |
| 41-50 | 15.3% | 100 | 17.5% |
| 51-60 | 19.2% | 92 | 16.1% |
| 61-70 | 16.3% | 66 | 11.5% |
| 71-80 | 12.2% | 28 | 4.9% |
| 81+ | 6.0% | 14 | 2.4% |
| Unknown | 1.3% | 32 | 5.6% |
| Total | 100.0% | 573 | 100.0% |

**Stage 2**

| Gender | SCH Population | Count | Percentage |
|---|---|---|---|
| Female | 63.0% | 45 | 58.4% |
| Male | 37.0% | 32 | 41.6% |
| Other | 0.0% | 0 | 0.0% |
| Total | 100.0% | 77 | 100.0% |

| Vulnerability/vulnerabilities | SCH Population | Count | Percentage |
|---|---|---|---|
| No | 64.6% | 51 | 66.2% |
| Yes | 35.3% | 26 | 33.8% |

| Ethnicity | SCH Population | Count | Percentage |
|---|---|---|---|
| White | 81.4% | 37 | 48.1% |
| Black, Black British, Caribbean or African | 3.5% | 3 | 3.9% |
| Mixed or multiple ethnic groups | 2.8% | 4 | 5.2% |
| Asian or Asian British | 1.8% | 3 | 3.9% |
| Other ethnic group | 0.6% | 3 | 3.9% |
| Chose Not To Specify | 1.3% | 4 | 5.2% |
| Unknown | 8.5% | 23 | 29.9% |
| Total | 100.0% | 77 | 100.0% |