



*Championing better homes and communities*

## Housing Ombudsman Good Practice Consultation

NFA response

May 2024

Submitted via the Housing Ombudsman's online consultation

### Introduction

The NFA (National Federation of ALMOs) is the trade body which represents arms-length management organisations across England. All are not-for-profit bodies wholly owned by their parent councils, created to manage council-owned housing and deliver housing-related services.

The NFA represents 19 ALMOs across the country managing around 223,500 local authority-owned properties. ALMOs also build and acquire new stock. They deliver housing services for tenants and their wider communities.

For more information on our submission, please email Lisa Birchall, NFA Head of Policy at [lisa.birchall@almos.org.uk](mailto:lisa.birchall@almos.org.uk).

### Consultation questions

1. The Ombudsman intends to use learning from the complaints handled as well as ideas and suggestions from residents and landlords to generate Good Practice. Do you agree with this approach?

Yes

2. Do you agree with our proposal to consult with key stakeholders during the development of Good Practice?

Yes

3. Do you agree with the principle of only issuing Good Practice for self-assessment when it is the most appropriate tool to handle the issue identified?

Yes

4. We have set out above a number of potential topics for good practice. Do you have any comments on them and are there other topics you would like to see the Ombudsman issue good practice on? Please provide more details below.

- Effective complaint handling during merger or stock transfer – could also include the closure of an ALMO as there are likely to be similar issues.
- Good practice around the Member Responsible for Complaints.

We would also request a schedule of good practice topics for a period (for example, twelve to eighteen months) to allow landlords to consider as part of their longer-term planning.

**5. Do you agree with the principle of requesting that landlords self-assess voluntarily against the issue of Good Practice at the point of publication?**

Yes we prefer self-assessment to be voluntary.

Considering the pressures on the sector and number of competing priorities, we request that the HOS has a period of leeway between publication and expecting to see the self-assessment in cases it is handling.

We also request that the Housing Ombudsman recognises the principle that landlords should be able to schedule self-assessments according to their business plans and priorities that have been agreed with tenants.

**6. Do you agree that a tailored self-assessment template, published alongside the relevant issue of Good Practice, would be of assistance?**

Yes, as long as it is not onerous to complete and is not compulsory to use.

**7. Do you have any other comments on good practice or self-assessment that you would like you to consider?**

We are pleased that the consultation recognises that 'self-assessment and making subsequent changes to policy, processes, systems and people are finite', and that the HOS intends to be proportionate in the number of Good Practice publications it publishes. Maintaining this will be key to making sure that members are able to effectively learn from the Good Practice and consider it alongside existing programmes of improvement and change.

The good practice recommendations also need to be achievable in a period of constrained resources and many competing priorities.

Many of our members already self-assess against the recommendations in Spotlight reports, so the relationship between these and Good Practice needs to be carefully considered, as well as the schedule of publication. It would also be good to confirm what the difference is between Spotlight reports and Good Practice reports.

It would also be useful for the Housing Ombudsman to publish more detailed information about how case handlers will use the Good Practice and self-assessments in deciding the outcomes of cases. Also, to make sure that Good Practice guidance is not retrospectively applied to cases.