



Championing better homes and communities

**Housing Ombudsman – response to the Business Plan consultation
March 2025**

Submitted via email to the Housing Ombudsman Service

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 15 ALMOs across the country managing around 170,000 local authority-owned properties. ALMOs also build and acquire new stock. They deliver housing services for tenants and their wider communities.

Our members are committed to delivering good housing services for tenants; and when things go wrong, putting them right. They recognise the valuable role that the Housing Ombudsman Service plays in holding landlords to account, and acting as a mediator and arbitrator in disputes. They also recognise the useful learning and good practice that the Housing Ombudsman Service shares from its caseload to drive continuous improvement.

Our main priorities for the next couple of years are:

- For HOS to improve its case handling processes to make them more streamlined; improve communication with landlord complaint handling staff, and increase consistency in approach across the country.
- For HOS to work with the government and the sector to reduce the impact of claims harvesters on tenants and landlords.

We have made some broad points below, rather than respond to the specific questions. For more information on our submission, please email Lisa Birchall, NFA Head of Policy at lisa.birchall@almos.org.uk.

1. Publication of best practice, Spotlight Reports and Good Practice

HOS produces excellent resources for the sector around good practice and learning from complaints, runs useful webinars and provides bitesize learning. While our members are keen to use this learning to improve their services, we think it's important to recognise that reading the reports, testing against the learning and recommendations - along with implementing all the other regulatory and legislative changes currently underway – takes time and organisational resources.

It might be useful to have a period of consolidation of the learning and recommendations to give organisations a chance to catch up.

We have raised with the Housing Ombudsman the importance of language and some of the recent headlines which accompany HOS communications.

We think it's important for HOS to keep an eye on the language it uses so it is a) fair and proportionate; b) in line with its role as a non-biased arbitrator between landlords and tenants; c) does not label 'the sector' with the same brush.

Recent examples include:

- Ombudsman urges the sector to overcome its "complacency" towards dealing with hazards ahead of Awaab's Law introduction.
- Resident held at gunpoint and domestic abuse victim left "terrified" among Antisocial Behaviour (ASB) cases highlighted by Ombudsman.

2. Improving case handling and communications

We think Aim 1.1. should state: Our services are human-centric, trusted, and provide a positive customer experience for residents **and landlords**.

Our members have fed back to us over the last few years that HOS could improve its case handling and communication. This would reduce the administrative burden on complaints handling teams. Members have stated that managing casework and communication from HOS has become a full-time role, in part because of the increase in cases, but also because of the administrative difficulties of working with HOS.

We would like HOS to work with complaints handling staff to understand the challenges and improve the process, which would mean more time could be spent on investigating and resolving complaints. We also feel it would be useful for HOS to set up a single point-of-contact model for landlords to be able to quickly contact HOS and resolve issues.

It is in everyone's interest to improve both the reality and the perception of working with HOS. Good landlords – of which there are many in the sector - need to be able to respect HOS as a trusted, efficient and independent check on their services, which will help to drive engagement and improve services. As part of this, HOS should always be modelling good customer services.

3. Link to Regulator/ LGSCO

Aim 3.3. states we share information with regulators, enforcement bodies, and other delivery partners to promote accountability.

We think that the interface between the Regulator and the Housing Ombudsman Service could be better defined and communicated. For example, we would expect landlords that appear frequently in HOS's reports or with high levels of maladministration to be referred from HOS to the Regulator for investigation. Although this does happen, it is not very well communicated externally, and there is a perception that these two systems are operating too independently of each other, with the Regulator operating an outcomes-focused approach and the Housing Ombudsman Service being seen as more prescriptive.

The Ombudsman landscape for housing is currently fractured, with some tenancies covered by the Housing Ombudsman Service and some by the Local Government and Social Care Ombudsman. These schemes operate differently, and you can easily get the situation where two neighbours of the same landlord come under two different schemes. In order to make sure that tenants have the same options for redress, we think this should be looked at.

4. Landlords with high maladministration rates table

We would like the HOS to review the way it presents the data in the table [Landlords with high maladministration rates](#).

Our main issue with this table is that it presents data in a way that is not particularly easy to understand, but also puts landlords next to each other with considerably different levels of maladministration, which suggests an equivalence.

As an example: the London Borough of Sutton has 5 findings from 2 determinations (and a 100% maladministration rate) and is on the same list as – for example – Wandle Housing Association with 89 findings from 40 determinations (and an 82% maladministration rate) or Shepherd Bush Housing Association Ltd with 58 findings from 20 determinations (and a 79% maladministration rate).

There is also City of Doncaster Council with 3 determinations (and 8 findings and a maladministration rate of 75%) on the same list as A2Dominion Housing Group Ltd with 76 determinations (169 findings) and a maladministration rate of 80%; Camden Council with 57 determinations (150 findings) and 83% maladministration rate; Haringey Council with 58 determinations (147 findings) and a maladministration rate of 84%; and Lambeth Council with 96 determinations (225 findings) and a maladministration rate of 89%.

It should be calculated through two metrics: those landlords with the highest numbers of determinations (calculated per 1,000 properties managed) and the highest rates of maladministration. That way, you could identify the top 10 or top 20 ‘frequent flyer’ landlords.

5. Mediation

We agree that early resolution should be prioritised. We would like the Housing Ombudsman to look at its mediation process to make sure that it operates as genuine mediation, balancing the views of both landlords and tenants in each case. We have had some feedback from members that mediation currently does not always function as well as it could.