



G15 response to Housing Ombudsman Business Plan 2026-27 consultation

March 2026



About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 880,000 homes across the country, including around one in ten homes for Londoners. The G15 represents the largest providers of new affordable homes in London and accounts for approximately 15% of all affordable homes built across England. Over the last few years, our members have funded and delivered more than 56,000 new homes in partnership with the Mayor of London. Delivering good quality safe homes for our residents is our number one priority. Last year our members invested almost £2bn in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing
- Sovereign Network Group

For more information, please contact: G15@Peabody.org.uk

Position Statement

Q1. Do you support the prioritisation of activities to deliver our corporate strategy?

- Strongly support
- **Support**
- Neither support or do not support
- Do not support
- Strongly do not support

If you do not support, what should we prioritise instead?

We support the focus on improving timeliness, earlier resolution, and more tailored engagement with high-volume landlords. These are the right priorities given sustained increases in demand and rising escalation rates across the sector. However, the plan does not yet show clearly what will be prioritised in practice, how activity will be sequenced, or how this will translate into faster outcomes for residents.

Demand across the sector continues to increase, with escalation rates rising year-on-year, including stage 2 complaints increasing to around 14 per 1,000 homes. This reinforces the importance of the proposed focus. Members emphasise the importance of reducing determination times, as ongoing delays continue to impact both residents and landlords. Greater progress in this area is critical to improving confidence in the service and delivering timely outcomes. However, there are material risks to delivery within the proposed approach that should be addressed. This is particularly important in the context of wider sector pressures, including sustained increases in investment in repairs and maintenance and limited financial flexibility to absorb additional costs.

We would welcome greater clarity on what is genuinely being prioritised within the Business Plan. While many of the proposed activities are desirable, the plan gives limited sense of sequencing, relative importance, or how different interventions will be prioritised in practice. This makes it difficult to assess whether resources are being focused on the areas most likely to improve outcomes for residents and deliver value for money.

The plan sets out a wide range of activity, but it is not always clear what will be delivered in 2026–27 and how success will be measured. Without clearer prioritisation and measurable commitments, it is difficult to assess whether resources are focused on the areas most likely to improve outcomes for residents and deliver value for money.

Workforce capability and consistency

The planned expansion in caseworker numbers must be matched by strong induction, training, and quality assurance. Rapid scaling without sufficient investment in capability, particularly in the context of stretching performance targets, risks variability in decision quality and undermines confidence in outcomes.

Realism of performance targets

There are concerns about the deliverability of some targets, particularly given the scale of demand growth and the Ombudsman's acknowledgement that determination volumes have not kept pace with incoming cases, leading to a growing open caseload. Members report ongoing delays in case resolution, including older cases remaining open for extended periods, which reinforces concerns about whether current capacity is sufficient. This raises questions

about whether the proposed targets are achievable within the planned timeframe and sufficiently grounded in current system capacity.

Members would also welcome greater clarity and transparency on the proposed KPIs, including how performance will be reported and assessed over time. There is currently limited visibility of performance against existing measures, and clearer reporting would support confidence in the service and its improvement trajectory.

Focus on core service before expansion

With additional responsibilities anticipated, including STAIRs, members consider it important that the Ombudsman remains focused on its core role as an impartial dispute resolution service. While wider activity such as good practice guidance and sector engagement adds value, these should not detract from the timely, consistent, and high-quality resolution of cases. We would welcome reassurance on how an expanding remit will be managed to ensure that service quality is maintained and continuously improved, including clarity on how resources, capability, and performance will be balanced across existing and new responsibilities.

Learning and guidance

The existing learning offer is extensive but can be difficult to navigate. A more targeted and prioritised approach, focused on practical and actionable guidance, would increase its value.

Q2. Do you support our strategic approach to bringing down the volume and age of cases awaiting investigation?

- Strongly support
- Support
- **Neither support or do not support**
- Do not support
- Strongly do not support

If you do not support, what should we do differently?

Members fully support ambition to reduce the volume and age of cases and improve timeliness. This is a key priority for registered providers and critical to delivering better outcomes for residents. However, we do not consider that the proposed approach sufficiently addresses the underlying drivers of demand or the structural pressures within the system. We also note that how these changes are implemented in practice will be critical to their success, particularly in ensuring consistency, transparency, and fairness.

Demand is increasing across the system, but case durations remain too long. There is a need for clearer commitments on how additional resource will translate into faster, measurable improvements for residents.

A significant proportion of complaints are driven by structural housing issues, particularly repairs and housing condition. This is reflected in sustained and increasing levels of investment across the sector, with the largest housing associations now collectively spending over £10 billion annually on repairs and maintenance to improve existing homes. These issues are particularly acute in higher-density urban areas, where older housing stock, constrained space, and more complex building types increase the likelihood of recurring issues and escalation. Across the sector, a large proportion of social housing stock predates modern standards, and anti-social behaviour remains a high-volume issue, both of which add to the complexity of cases and the risk of escalation. These are systemic challenges that cannot be resolved through faster investigation processes alone.

Moreover, members are concerned that increasing headcount is being relied on as a primary solution to rising demand, when this is better understood as a short-term response to a deeper structural problem. Without stronger action to reduce demand upstream, there is a risk of creating an unsustainable cycle of increasing caseloads, expanding workforce requirements, and further pressure on fees.

It would also be helpful to see clearer articulation of which interventions are expected to reduce demand over time, rather than primarily improving the management of existing caseload.

Use of focused investigations

While earlier resolution is welcome, members have concerns regarding the use of focused investigations. We find there to be limited clarity on how decisions are reached, how quality assurance is applied, and how fairness is maintained where full investigation has not taken place. Members have seen examples where findings appear to have been made without full investigation or without progression through stage 2 processes. There is also ongoing ambiguity in the Ombudsman's position on early and local resolution. While the Complaint Handling Code emphasises the importance of resolving issues at the earliest opportunity, there has been inconsistency in how this is interpreted in practice, particularly in relation to what constitutes acceptable early resolution activity. This raises concerns about consistency, transparency, and procedural fairness within this approach.

While some members support the intention behind focused investigations as a means of improving timeliness, there is a shared view that clearer safeguards and consistent application are required. Members also support a more proportionate approach to lower-risk or more routine cases, where this can be done fairly and transparently. If designed well, this could help the Ombudsman focus greater time and resources on the most complex cases, where detailed investigation and scrutiny are most needed.

To support confidence in this approach, greater clarity is needed on:

- The criteria used to determine when a focused investigation is appropriate
- How quality assurance is applied to ensure consistent and fair outcomes
- The safeguards in place for more complex or high-risk cases
- Clear expectations on how landlords should engage at each stage of the process, particularly where cases have not progressed through stage 2, including roles, responsibilities, and timelines

Greater clarity on roles, expectations, and responsibilities throughout the process would support more consistent engagement and reduce the risk of misunderstanding or delay.

Data transparency and alignment

Members note ongoing discrepancies between landlord data and Ombudsman data on case volumes and trends. This lack of alignment, alongside limited visibility of cases progressing through the Housing Ombudsman system, limits landlords' ability to anticipate demand, understand escalation rates and emerging risks, align internal reporting, and respond effectively. We would welcome:

- Greater transparency on forecasting assumptions
- Clearer methodology for case categorisation
- Regular reconciliation of data between landlords and the Ombudsman

Members also highlighted that discrepancies in data can result in time being spent reconciling figures, rather than focusing on service improvement. Improved reporting on case volumes and pipeline would support better planning and more effective responses.

Deliverability of the approach

There is a risk that the proposed approach overestimates the pace at which the HOS can realistically reduce its backlog. Demand continues to grow, and current trends suggest that inflow continues to outpace resolution, resulting in a persistent backlog. Without a clearer plan to address this imbalance, there is a risk that targets will not be met and that delays will continue.

Members also note that similar structural approaches adopted by other Ombudsman services, such as the Financial Ombudsman Service, have required subsequent revision following implementation challenges. This reinforces the importance of ensuring that proposed changes are realistic, tested, and capable of delivering the intended outcomes.

Operating context

The approach would benefit from greater recognition of variation across the sector. In higher-density areas such as London, older housing stock, the geographic and operating environment, and consistently higher levels of anti-social behaviour contribute to increased demand and greater complexity.

There is a risk that absolute complaint volumes are used as a primary indicator of performance without sufficient contextualisation or consideration of underlying drivers. This variation should be reflected more explicitly in how performance and demand are assessed. In particular, there is a need for:

- More consistent use of relative measures (for example, cases per 1,000 homes), particularly in external reporting and engagement
- More explicit and systematic consideration of stock profile and operating environment when assessing landlord performance
- Further development of a risk-based approach to engagement that targets underlying drivers of demand, rather than volume alone

Some members emphasise that performance assessments should better reflect differences in scale, geography, and stock profile, to avoid misinterpretation of higher complaint volumes.

Q3. Are there any tools, products, or particular topics we should explore that could help to reduce the demand on our Service across the sector?

Share your suggestions below.

Members strongly support the development of tools that improve consistency and reduce avoidable escalation.

Compensation guidance and calculator

The proposed publication of compensation guidance is welcome and should be supported by a standardised calculator to promote consistency across the sector. Greater consistency in redress is critical to maintaining trust in complaint handling.

Inconsistent approaches to redress can undermine trust in complaint handling and contribute to escalation. This is particularly important where satisfaction with complaint handling is lower than overall satisfaction levels. Increased volumes of determinations are also likely to result in higher levels of compensation and service recovery costs, which further increase financial exposure for landlords.

Members would welcome assurance that, when determining cases, the Ombudsman applies the Complaint Handling Code and compensation guidance that were in place at the time of the complaint, rather than the version current at the point of determination, to ensure fairness and consistency for both residents and landlords.

Alongside financial redress, continued emphasis on practical resolution is important to ensure that outcomes focus on putting issues right.

Data alignment

There is a clear need for better alignment of data and case categorisation between landlords and the Ombudsman. Without shared definitions, it is difficult to achieve meaningful benchmarking or consistent understanding of demand across the sector.

Forecasting and insight

Improved forward visibility of demand would reduce uncertainty for landlords in resourcing and support more effective planning. This should include clearer and more consistent forecasting of the assumptions that underpin projections and the regular sharing of case trends and emerging issues to support early intervention and reduce repeat complaints.

Members would also welcome greater forward visibility of the themes and topics the Ombudsman expects to focus on across the year. A more regular and predictable cadence for thematic reports and learning outputs would help landlords plan, respond to findings in a timely way, and use the insight more effectively to improve services.

Learning and guidance

The current learning offer is extensive but can be difficult to navigate. A more targeted and prioritised approach, with clearer signposting of key themes, would increase usability and impact. We would welcome tools that enable landlords to track their own engagement with the Centre of Learning and related outputs. This would support internal assurance, help target further training, and allow the Ombudsman to better evidence the impact of its learning offer.

Members would appreciate greater clarity on how the Ombudsman intends to deliver sector-wide learning in practice, including how insight will translate into measurable improvements in landlord performance and reduced demand.

Q4. Are there any approaches we could explore to reduce demand from individual landlords?

Members support a more targeted approach to working with individual landlords, particularly through portfolio-based engagement with higher-volume organisations. A consistent portfolio management model, combined with earlier engagement and tailored insight for higher-volume landlords, would help address systemic drivers of demand more effectively. Where this model is working well, it has supported earlier issue resolution, stronger learning, and more constructive engagement. However, some members have also experienced inconsistency in this support over time, which suggests that greater stability and wider availability would strengthen its impact.

Demand should, however, be understood in context rather than assessed solely on volume. Sector data shows variation in outcomes across landlords, and the regulator has highlighted the importance of interpreting performance alongside factors such as stock profile, scale, and operating environment. Higher complaint volumes among larger landlords, particularly those operating in urban areas, reflect a combination of scale, environment, and stock complexity rather than performance alone. There is a risk that volume is treated as a proxy for

performance without sufficient context. We note that higher complaint volumes do not necessarily indicate poorer performance. Recent evidence from Housemark's [Monthly Pulse survey](#) indicates that landlords with stronger complaint handling performance can receive higher volumes of complaints, demonstrating greater resident confidence and accessibility of services. This suggests that higher complaint volumes can, in some cases, reflect a more open and effective complaint handling culture, not poorer performance. This is reinforced by broader changes in customer expectations and engagement, including a greater willingness to raise concerns and pursue complaints where services do not meet expectations.

Demand is also influenced by wider system factors, including increased awareness of the Ombudsman service and rising expectations of landlord performance. This reflects a positive shift, with residents more informed about their rights and more confident in raising concerns. While welcome, this has contributed to increased levels of escalation, alongside broader changes in how complaints are presented and pursued. Members have also noted a shift in the nature of complaints, including the increasing use of AI-assisted submissions. These complaints can be longer and more detailed, which can increase the time required to assess and respond effectively. This also has implications for how residents engage with the complaints process, including their understanding of the issues raised and their expectations of outcomes.

Escalation rates have increased across the sector, suggesting that demand is being shaped by broader system changes as well as individual landlord performance. This reinforces the need for a system-wide approach to reducing demand, alongside continued joint working between the Ombudsman and landlords to address root causes. Members recognise the importance of maintaining a collaborative and constructive relationship between landlords and the Ombudsman, where engagement supports early resolution, shared learning, and continuous improvement across the sector.

Q5. Do you have any other comments or observations on our 2026 - 27 Business Plan?

We recognise the need to invest in capacity to respond to rising demand. However, the proposed 31.5% fee increase is substantial and comes at a time of significant financial pressure across the sector.

Across the G15, the increase in fees equates to around £2 million less available next year. In practical terms, this could fund around 300 kitchen replacements or 500 bathroom upgrades for residents.

This represents a material additional cost that must be absorbed within already constrained budgets, at a time of rising repair costs, record investment in existing homes, and continued delivery of new supply. In 2024-25, England's two hundred largest registered providers collectively invested over £10 billion annually in repairs and maintenance – a 13% increase on the previous year and a 42% rise since the pandemic. While this reflects a sustained focus on improving existing homes, it leaves limited flexibility to absorb further cost increases without direct impact on residents.

The consultation indicates that even with this increase, up to 50% of cases may still not be determined within six months. This raises questions about value for money and whether the proposed approach will deliver the improvements expected.

We also have concerns regarding the consistency and quality of determinations, with some members reporting the need to seek clarification or challenge a proportion of decisions. Members are concerned that increasing case volumes and processing speed could further impact quality, leading to more disputes and review requests, which would undermine efficiency gains. There is also a risk that prioritising speed of resolution without sufficient focus on quality and consistency may undermine fairness and confidence in outcomes for both residents and landlords.

Members note the importance of maintaining clarity in the Ombudsman's core role as an impartial dispute resolution service. Expansion into areas relating to landlord performance and governance could create overlap with existing regulatory functions, reducing clarity for residents and landlords, increasing complexity, and reducing overall system efficiency.

Members would welcome broader discussion about whether the current funding model remains the most appropriate and sustainable approach over the medium term, given continued growth in demand, increasing costs, and the cumulative financial impact on landlords.

We would also welcome earlier engagement on future fee changes and improved transparency to support financial planning. The timing of the current proposals has created challenges for budget-setting across the sector, particularly where organisations have already finalised financial plans. For example, one member reported having limited notice of the proposed increase, resulting in a significant in-year budget pressure that required reallocation of resources at short notice. This creates real operational consequences, including the need to reprioritise budgets across business areas and potential impacts on staffing, service delivery, and planned investment in homes. Given the scale of the proposed fee increase, earlier engagement and clearer forward visibility would enable landlords to plan more effectively and avoid unintended impacts on service delivery and investment in complaint handling.