

REDDITCH BOROUGH COUNCIL

Executive

2nd September 2025

Regulator of Social Housing - Inspection Report and Housing Improvement Plan

Relevant Portfolio Holder	Councillor Bill Hartnett
Portfolio Holder Consulted	Yes
Relevant Assistant Directors	Simon Parry & Judith Willis
Report Author	Job Title: Assistant Director of Environmental and Housing Property Services, Assistant Director of Community and Housing Services Contact email: Simon.parry@bromsgroveandredditch.gov.uk Judith.willis@bromsgroveandredditch.gov.uk Contact Tel: 3201
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Community & Housing
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Executive RESOLVE that: -

- 1) The Regulatory Judgement published by the Regulator for Social Housing on 30th July 2025 is noted, following an inspection of Redditch Borough Council's Housing Service.**
- 2) The Housing Improvement Plan, which includes actions to address areas for improvement, confirmed as part of the inspection process, is approved.**
- 3) Delegation be given to the Assistant Director Environment & Housing Property and Assistant Director Community & Housing, following consultation with the Housing Portfolio Holder, to revise the Housing Improvement Plan following consultation with the Regulator for Social Housing as part of their Provider Improvement Process or in response to legislative changes.**
- 4) The proposed structure for governance of the Housing Improvement Plan be approved.**

The Executive RECOMMEND that: -

- 5) A supplementary estimate of £60,000 is added to the Housing Revenue Account budget for 2025/26 funded from the Housing Revenue Account Balance Reserves to:
 - a) appoint a Senior Tenant Engagement & Participation Officer (£25,000 – part year effect) and:
 - b) establish, train and manage the development of participation opportunities for Council Housing tenants and leaseholders to influence changes in the delivery of Housing services (£35,000)
- 6) £75,000 ongoing expenditure budget is added to the Housing Revenue Account base budget in 2026/27, funded from the Housing Revenue Account to:
 - a) continue to employ a Senior Tenant Engagement & Participation Officer (£50,000 – full year effect) and:
 - b) continue to train and manage the development of participation opportunities for Council Housing tenants and leaseholders to influence changes in the delivery of Housing services going forward (£25,000).

2. BACKGROUND

Executive Summary

- 2.1 In July 2025, Redditch Borough Council underwent a comprehensive inspection by the Regulator of Social Housing (RSH), following the enactment of the Social Housing (Regulation) Act 2023. This inspection assessed the Council's compliance with the newly introduced Consumer Standards, which focus on safety, transparency, community engagement, and tenancy management.
- 2.2 The Council received a **C3 Regulatory Judgement**, indicating serious failings in delivering housing services, particularly in repairs and maintenance, fire safety, tenant engagement, and data management. Key issues included approximately 3,000 overdue repairs, 3,000 outstanding fire safety actions, limited stock condition surveys, and insufficient tenant involvement mechanisms.

- 2.3 Despite these challenges, the RSH acknowledged the Council's commitment to improvement, highlighting positive practices in electrical safety, anti-social behaviour management, and the establishment of a Damp and Mould team. The inspection also praised the passion and dedication of staff and Members.
- 2.4 In response, the Council has developed a robust **Housing Improvement Plan**, which the Executive Committee is asked to approve, which outlines targeted actions across all Consumer Standards. Key initiatives include:
- Appointment of a **Senior Tenant Engagement & Participation Officer**.
 - Establishment of tenant forums and training programmes.
 - Implementation of new systems for repairs and safety compliance.
 - Development of a five-year rolling programme for stock condition surveys.
 - Enhanced governance through a multi-tiered oversight structure.
- 2.5 A supplementary budget of **£60,000 for 2025/26** and **£75,000 ongoing from 2026/27** has been proposed, from the Housing Revenue Account, to support these improvements.
- 2.6 The Council is committed to transparency and accountability, with quarterly reporting to the Executive Committee and ongoing engagement with tenants. The Housing Improvement Plan will be monitored through a structured governance framework, including strategic oversight and operational delivery groups.
- 2.7 This report marks a pivotal moment in Redditch Borough Council's journey to transform its housing services, ensuring safe, quality homes and meaningful tenant involvement.

Regulator of Social Housing

- 2.8 The Social Housing (Regulation) Act received royal assent in July 2023 and amended the original delivery of regulation under Section 193 of the Housing and Regeneration Act 2008. The Social Housing (Regulation) Act amended the original Consumer Standards, with the Regulator of Social Housing (RSH) consulting on the revised standards between July and October 2023. The new Consumer Standards were published in February 2024 together with its first Consumer Standards Code of Practice.

- 2.9 In April 2024, the RSH was given new powers, following the introduction of the Social Housing (Regulation) Act 2023, to proactively inspect all social housing landlords (with over 1,000 homes) as part of a continuing effort to drive up standards within the social housing sector. This in effect sees the return of regulation for local authority social housing landlords for the first time in several years of deregulation.
- 2.10 The Regulator of Social Housing introduced four new Consumer Standards in April 2024 to ensure social landlords provide safe, quality homes and services. These standards apply to all registered providers, including local authorities, and are enforced through regular inspections and tenant feedback. The following is a brief summary:
1. **Safety and Quality Homes Standard** – Landlords must understand the condition of their homes and ensure they are safe, well-maintained, and meet health and safety requirements.
 2. **Transparency, Influence and Accountability Standard** – Tenants should be able to access information about their landlord's performance and have meaningful opportunities to influence decisions.
 3. **Neighbourhood and Community Standard** – Landlords must work to maintain safe, clean, and well-managed neighbourhoods, collaborating with other agencies where needed. It includes addressing anti-social behaviour, including domestic abuse.
 4. **Tenancy Standard** – This covers fair and transparent tenancy management, including allocations, enabling mutual exchanges and support for tenants to sustain their tenancies.
- 2.11 Under the new Consumer Standards framework, the RSH introduced a new grading system in April 2024. Under this system, social landlords are assessed and assigned a "C" grade, which reflects how well they meet the required consumer standards. The scale runs from C1 to C4, where:
- C1** indicates the landlord is meeting the consumer standards effectively.
- C2** suggests some weaknesses, but not serious enough to cause significant concern.
- C3** points to serious failings in delivering the standards, with current arrangements not strong enough to put things right - this often impacts tenants' experiences and accountability.

C4 would represent the most severe level of non-compliance, though as of now, no landlords have been publicly graded at this level.

- 2.12 These gradings are based on evidence gathered through inspections, self-referrals, and regulatory engagement. As at July 2025, 53 Councils with social housing had been inspected and the gradings given were:

C1 - 4 Councils	(8%)
C2 - 17 Councils	(32%)
C3 - 30 Councils	(56%)
C4 - 2 Councils	(4%)

3. OPERATIONAL ISSUES

The Inspection

- 3.1 An inspection of Redditch Council's landlord services was first notified on 22nd January 2025 with the final submission of information on 17th May 2025. RSH shared the scope of our inspection, and all four consumer standards were in scope.
- 3.2 The inspection consisted of contextual documentation (Appendix 1), a scoping document (Appendix 2), a two-day site visit including observations of a meeting with the portfolio holder, corporate leadership team meeting and executive meetings, together with interviews with key senior management, Members, officers and tenants.
- 3.3 In excess of 400 items of evidence were provided across the inspection covering the contextual document and a supporting presentation together with supplementary requests made through the whole process.

Redditch Borough Council – Regulatory Judgement

- 3.4 The Council were verbally informed of the Regulatory Judgement on Monday 30th June 2025 however this was under embargo until being published on the RSH website on 30th July 2025. The Regulatory Judgement was a C3 grade (Appendix 3).
- 3.5 According to the Regulator of Social Housing's updated guidance, local authorities are expected to take primary responsibility for identifying and addressing any weaknesses in how they meet the Consumer Standards. If a local authority receives a **C2, C3, or C4 grading**, it must develop an improvement plan to address the issues identified during inspection.

- 3.6 From the RSH guidance “A C3 grade means that there are serious failings in the landlord delivering the outcomes of the consumer standards, which the landlord’s current arrangements are not strong enough to put right. This will be significantly impacting on service outcomes for tenants and/or accountability to tenants. We expect the landlord to develop a plan that will drive significant change and to share that with tenants. Our engagement with the landlord will be intensive and we will seek evidence that gives us the assurance that sufficient change and progress is being made.”
- 3.7 The guidance also emphasises that improvement plans are not automatically approved by the RSH. This means local authorities must demonstrate that their plans are robust and capable of delivering real change, even if the regulator doesn’t formally sign off on them.
- 3.8 The Regulatory Judgement recognised that Redditch Borough Council needed significant improvement within Repairs and Maintenance with particular reference to the large number of overdue repairs (circa 3,000), lack of root cause analysis and strategic oversight, inconsistent data, lack of visibility and promotion of the repairs policy on the Council’s website. Fire Safety was another area where significant improvement was required with nearly 3,000 overdue remedial actions from Fire Risk Assessments. The lack of opportunities for tenants to influence and scrutinise housing services and having no tenant engagement strategy nor formal tenant groups.
- 3.9 Other notable weaknesses identified were only 20% of housing stock had a condition survey undertaken in the last five years with 25% having no recorded condition survey. Whilst all risk assessments are complete for Water Safety at the time of the inspection there were over 150 overdue actions. Complaint handling was generally slow in achieving response times, as set out by the Housing Ombudsman, although it was acknowledged there had been early improvements in achieving better performance. Performance Information publicised to customers was not easily accessible or well communicated to tenants.
- 3.10 The Regulatory Judgement identified areas with positive practices including Electrical Safety, where quick action was taken when missing certificates were identified, and the development of a robust no-access policy. It was acknowledged that with the establishment of a new Damp and Mould team there was better triaging and leadership awareness of this aspect of the service. The strength of partnership working was acknowledged especially around Anti-Social Behaviour and there is an accessible allocations policy and support for vulnerable tenants.

- 3.11 In providing feedback the Regulator also emphasised that they “*were really blown away by all of the efforts of the team that they met on site and that Officers and Members showed their passion for tenants and were clear about improvements to be put in place.*” The Regulator further reported that Redditch Borough Council had been engaging constructively with them and had plans in place to address most of its failings, including completion of health and safety remedial actions, developing an effective and timely repairs service, and ensuring that tenants have meaningful opportunities to influence and scrutinise services. Redditch Borough Council had demonstrated that it understood the issues it needed to address and was already taking action towards rectifying the failures identified. This included developing plans to deliver the required improvements, introducing improved oversight of landlord services, procuring new systems and validation processes for health and safety information, and developing its strategy for tenant engagement. Whilst early in the delivery of these plans, there was positive evidence of progress being made in some areas and the regulator had assurance that there was strong organisational commitment to ensuring improved outcomes for tenants.
- 3.12 The Council’s Housing Service must ensure that it retains an awareness and focus on all aspects of the Consumer Standards, and to actively address action required to support the continuous improvement plan.

Communicating the Judgement

- 3.13 The Regulatory Judgement has been communicated to all tenants, leaseholders, Councillors and staff, through the Housing Annual Report covering 2024/25 that has been mailed to each household that the Council manages and through dedicated sessions with staff and Members. The Council’s website also includes news of the Judgement, links to the report from RSH and associated Frequently Asked Questions.
- 3.14 Future communication, consultation, scrutiny and involvement opportunities for tenants and leaseholders will be developed, including a Housing specific Engagement Strategy that will be subject to a future report.

Improvement Journey

- 3.15 The Housing Service has gone through significant changes in order to modernise over the last 5 years, this has included large scale changes in personnel, at all levels, the introduction of new systems and technologies, new strategies, policies and procedures as well as developing a more customer focussed delivery of services. During this

period the need to ensure performance information and management was undertaken has enabled a greater understanding of our current position ,when compared to our peers, and to drive improvements. Whilst significant improvements have been made it is acknowledged that further improvements are required.

- 3.16 To ensure the Council was seeking continuous improvement, prior to the Regulatory Judgement being made, an interim Housing Improvement Plan was developed and is being actioned and monitored. This plan was shared with the Executive Committee at a meeting held on 10th June 2025 and was approved with a three-monthly reporting cycle to feedback on progress. Subsequently, following the Regulatory Judgement, the Improvement Plan has been reviewed and updated (Appendix 4).
- 3.17 The Housing Improvement Plan is built on the areas within the Consumer Standards where the Council has not met the desired outcomes. The actions cover Safety & Quality, Transparency, Influence and Accountability and Neighbourhood and Community. Work is ongoing to deliver the actions and improvement identified and progress is included at Appendix 4.

Governance Arrangements

- 3.18 To ensure that the Housing Improvement Plan is managed and monitored effectively it is proposed to create the following governance arrangements as described at section 3.19 of this report. An update on progress and performance of the Housing Service is included in the work programme for the Executive Committee with reports produced on a quarterly basis.
- 3.19 To support the formal reporting of progress, and ensure actions are delivered, it is proposed to establish a structure that has a Housing Improvement Board, which will provide strategic oversight, a Housing Improvement Delivery Team, for day-to-day management and co-ordination, and separate workstreams/subgroups to deliver specific areas of the plan. This structure is set out together with initial Terms of Reference at Appendix 5.
- 3.20 Following the Regulatory Judgement, as part of the RSH powers under the Social Housing (Regulation) Act 2023, there will be a Provider Improvement Process which is a formal mechanism by which the RSH can issue a Performance Improvement Plan (PIP) Notice where the RSH has identified concerns through the inspection process and or through data. Regular monthly meetings will be held with

representatives of RSH from August 2025 to provide assurance that the concerns raised are being actioned in a timely manner.

4. FINANCIAL IMPLICATIONS

- 4.1 The Housing Revenue Account will fund the additional costs in line with the requirements of the Social Housing Regulation Act 2023 and the outcomes of the Regulatory Judgement.
- 4.2 The current proposed additional cost implications are as follows:
- In 2025/26, £25,000 to establish the post of Senior Tenant Engagement & Participation Officer and £25,000 to train and manage the development of participation opportunities for Council Housing tenants and leaseholders so that they can influence changes in the delivery of Housing services. In addition, a further £10,000 to set up the tenant involvement opportunities, covering any additional events or outreach to attract willing parties, associated IT set up including laptops and legal fees.
 - For 2026/27 onwards, £50,000 is required for the new post, £25,000 to provide initial and ongoing training for participants, additional consultancy support in setting up and managing these new forums, meeting expenses, associated staff time and communications.
- 4.3 These additional costs will be funded from Housing Revenue Account balance reserve. Any future additional costs to deliver against the Action Plan will be brought to future Executive Committee meetings.

5. LEGAL IMPLICATIONS

- 5.1 The report sets out the requirements of legislation which the Council is required by law to adhere to. Compliance with section 193 of the Housing and Regeneration Act 2008 as amended by the Social Housing (Regulation) Act 2023.
- 5.2 Inspections are carried out under section 201 to section 203A of the Housing and Regeneration Act 2008.

6. OTHER - IMPLICATIONS

Local Government Reorganisation

- 6.1 There are no direct implications for Local Government Reorganisation.

Relevant Council Priority

6.2 Community & Housing

- Build more council homes.
- Ensure our housing stock is clean & safe to live in
- Reduce the housing waiting list.
- Reduce the number of families in temporary accommodation.
- Improve time taken for repairs to be completed.

Climate Change Implications

- 6.3 The responsive, cyclical and planned maintenance of our properties seeks to ensure our Council Housing properties are well maintained, warm and safe. Included within our programme of works are projects to increase the thermal efficiency of properties. In particular, within the HRA Capital Programme there are budgets established to improve the energy efficiency rating of properties with an Energy Performance Certificate of D or below.

Equalities and Diversity Implications

- 6.4 The contents of this report impact on all our customers.

7. RISK MANAGEMENT

- 7.1 The following represent the key risks identified.

Risk	Description	Risk Mitigation
Failure to address improvements identified in the Regulatory Judgement	The Council cannot demonstrate the assurance required by the Regulator to make the improvements identified in the Regulatory Judgement	Housing Improvement Plan with regular review through Housing DMT, Portfolio for Housing and quarterly reporting of progress to the Executive Committee.
Failure to meet the Consumer Standards	The Council fails to meet the Consumer Standards which could lead to a self-referral and subsequent actions	Housing Improvement Plan progress monitoring and annual self-assessment.
Reputational Damage	Confidence in the Council's Housing Service declines affecting stakeholder relationships	Acknowledge the judgement publicly and promptly. Demonstrate a clear commitment to improve and provide transparency on progress against the improvement plan through proactive media and social media management

8. APPENDICES and BACKGROUND PAPERS

Appendices

Appendix 1: RSH - Redditch Borough Council context form (included below)

Appendix 2: RSH - Redditch Borough Council Inspection Scoping Document (included below)

Appendix 3: RSH - Redditch Borough Council Regulatory Judgement

Appendix 4: Housing Improvement Plan

Appendix 5: Housing Improvement Plan Governance Proposals

Background Papers

Redditch Borough Council Housing Annual Report - [Housing Annual Report](#)

Housing Regulator Consumer Standards - [Regulatory standards for landlords - GOV.UK](#)

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Appendix 1: RSH - Redditch Borough Council context form

Redditch Borough Council context form

We are seeking information about...	...to help us understand	Information could include (but is not limited to):
The Council's provision of housing	The size of the housing stock, the type of housing provision and stock profile.	• A summary of the housing provision • Any reviews (internal or external) which detail the Council's provision. • Any demographic or context information relevant to the LA area
The operational management structure of the Council	Where the housing function sits within the Council structure and who is responsible for delivery of the housing function	• Organograms of the Council and the housing function. • A flow chart showing the hierarchy of decision-making. • Names of key officers • Details of any delegated management functions. • Details of whether Repair & Maintenance and other frontline services are delivered in-house or via other arrangements, such as joint ventures
The Council's governance structure	Where oversight of the housing function sits, how the Council gains assurance of performance, and the role of members in this oversight.	• A diagram or explanation showing the governance arrangements at officer and member level. • Names of relevant members – including portfolio holders and lead members. • Details of any relevant boards/committees, how information from these is escalated to cabinet and the frequency of meetings.

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Appendix 2: RSH - Redditch Borough Council Inspection Scoping Document



REGULATORY INSPECTION OF REDDITCH BOROUGH COUNCIL

SCOPE AND DOCUMENT REQUEST

Component	Element	Assessment focus	Suggested documents (latest versions)
1. Service Outcomes	1.1 Stock quality, decency, repairs & maintenance, and adaptations	• Redditch's accurate, up to date and evidenced understanding of the condition of its homes and how this informs the provision of good quality, well-maintained and safe homes. • Compliance with the Decent Homes Standard • The effectiveness, efficiency and timeliness of Redditch's repairs, maintenance and planned improvements service • Redditch's approach to assisting tenants seeking housing adaptations to access appropriate services. (no documents requested at this stage)	• Report to councillors/senior officers setting out Redditch's approach and range of activities for assessing and recording the condition of individual homes and for keeping this information up to date, including the extent and scope of physical surveys • Reporting to councillors/senior officers on the progress and current performance against this approach and activities to understand the condition of homes. • Examples of how information on the condition of homes has informed Redditch's approach to its planning and prioritisation of works. • Report to councillors/senior officers on compliance with the Decent Homes Standard and robustness of underlying evidence. • Report to councillors/senior officers setting out Redditch's assurance on the robustness of the data and processes underpinning its reported repairs and maintenance performance. • Evidence of internal audit and any external assurance/data validation of repairs and maintenance data and processes, and reporting to councillors and senior officers.



Component	Element	Assessment focus	Suggested documents (latest versions)
	1.2 Health and safety	• Redditch's approach to ensure the health and safety of tenants in their homes and associated communal areas.	• Reports to councillors/senior officers on delivery of work associated with health and safety of tenants in their homes including compliance with statutory health and safety requirements and progress on remedial actions • Reports to councillors/senior officers on the identification and management of damp and mould in tenants' homes • Reports to councillors/senior officers regarding the robustness of the data and processes underpinning reported performance on health and safety compliance • Evidence of internal audit and any external assurance/data validation of data and processes relating to health and safety compliance and reporting to councillors and senior officers. • Reports to councillors/senior officers on environmental health judgements, official disrepair claims, Housing Ombudsman and Building Safety Regulator findings where relevant

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Component	Element	Assessment focus	Suggested documents (latest versions)
	1.3 Maintenance of shared spaces	How Redditch works with tenants, other landlords and relevant organisation to take all reasonable steps to ensure the safety of shared spaces.	We are not requesting documents in this area at this stage.
	1.4 Local co-operation and anti-social behaviour (ASB)	- The effectiveness of Redditch's approach to dealing with ASB and hate incidents including through partnership working. - Redditch's co-operation with partners to promote the environmental, social and economic well-being of the areas in which it operates. (no documents requested at this stage)	- Reports to councillors/senior officers on performance on ASB and hate incidents. - Reports to councillors/senior officers on lessons learnt and improvements in the approach taken - Feedback to customers in relation to ASB and hate incidents performance
	1.5 Management of domestic abuse	Redditch's co-operative working with other agencies tackling domestic abuse and enabling tenants to access appropriate support and advice.	We are not requesting documents in this area at this stage.
	1.6 Tenancy	How Redditch ensures that tenancies and terms of occupation granted are appropriate, meeting all relevant requirements.	- Report to councillors/senior officers on how tenants', including prospective tenants', needs are taken into account through the approach to allocation and lettings. - Reports to councillors/senior officers on how tenancies and terms of occupation offered appropriately reflect accommodation purpose, the needs of individual households, community sustainability and efficient use of

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Component	Element	Assessment focus	Suggested documents (latest versions)
		- Redditch's support for tenants to maintain their tenancy. - Redditch's support to relevant tenants in eligible housing to access mutually exchange their homes	their homes, and assurance that statutory and legal requirements are being met - Reports to councillors/senior officers on the approach to tenancy management, including tenancy sustainment and prevention of evictions, and tackling tenancy fraud - We are not requesting documents in this area at this stage. - We are not requesting documents in this area at this stage.
2. Transparency & Accountability	2.1 Fairness and respect	Extent to which Redditch treats tenants and prospective tenants with fairness and respect.	Reports to councillors/senior officers that contain relevant consideration and evidence of the extent to which there is equitable access to and delivery of service.
	2.2 Diverse needs	Extent to which Redditch takes action to deliver fair access to, and equitable outcomes of, housing and landlord services for all tenants.	- Performance and other relevant reports to councillors/senior officers showing monitoring by service users' protected characteristics. - Information / reports on the use of profile data for customers and how this impacts service delivery

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Component	Element	Assessment focus	Suggested documents (latest versions)
	2.3 Engagement with tenants	• Redditch's approach to giving its tenants a wide range of meaningful opportunities to influence and scrutinise strategies, policies and services. • Extent to which Redditch ensures that it takes tenants' views into account in its decision-making about how landlord services are delivered and communicates how tenants' views have been considered.	• Reports to councillors/senior officers on tenant engagement activities, the extent to which these are successful in facilitating tenant influence and scrutiny and whether there is sufficient accessible support that meets the diverse needs of tenants. • Reports to councillors/senior officers and other communication that sets out the impact of tenant views on service delivery. • A list of tenant scrutiny activities undertaken in the previous two years and the forward programme. • Papers for the tenant scrutiny panel (or equivalent) meeting being observed, to be discussed at scoping meeting on 25th February 2025
	2.4 Service and performance information	• Extent to which Redditch communicates with tenants and provides information so that they can use its services, understand what to expect from Redditch and hold it to account. • How Redditch collects and provides information to support effective scrutiny by tenants of its performance in delivering landlord services. • Whether Redditch meets the requirements in relation to the tenant satisfaction measures (TSMs).	• Report to councillors/senior officers providing assurance that the information given to tenants is available in a form that ensures they can access services and essential information about their homes. • Publicly available performance information that supports effective scrutiny by tenants • Report to councillors/senior officers setting out assurance on the accuracy and robustness of the methodology underpinning its survey data and that the information is an accurate,

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Component	Element	Assessment focus	Suggested documents (latest versions)
			reliable, valid, and transparent reflection of their performance against the tenant satisfaction measures. • Reports to councillors/senior officers on the outcomes of Tenant Satisfaction Measures and any subsequent related activities including how information has been used to inform lessons learned and decision making.
	2.5 Complaints handling	• Extent to which complaints are addressed fairly, effectively and promptly. • Redditch's approach to ensuring that there is sufficient information so that tenants can make complaints, understand Redditch's policy and process including what they can do if dissatisfied with the outcome of how the complaint was handled and what lessons are being learnt from complaints overall to continuously improve.	• Reporting to councillors/senior officers on complaints handling performance and its self-assessment against the Housing Ombudsman complaints handling code. • Report to councillors/senior officers on themes and learning from complaints, improvements and changes made as a result. • Internal and external reviews on complaints handling. • Responses to Housing Ombudsman determinations in the last 12 months

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