

Customer Care Review Report

June 2025

HM Land
Registry



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i INTRODUCTION

- i.i. Property transactions are a complex process because they involve many practical and financial considerations. They often involve emotional decisions, as properties are typically a purchaser's home, and the resulting decisions and actions can have a significant impact. If a complaint arises during the property registration process then a negative customer experience can be costly both financially and in human terms. HM Land Registry ("HMLR") is the body that performs the property registration process in England and Wales as mandated in law, and is responsible for responding to customer complaints about its services.
- i.ii. Good complaint handling matters because it is an important way of ensuring customers receive the service they are entitled to expect. A customer complaint process is a positive part of any customer facing service organisation and a highly valuable source of feedback; it provides an audit trail and can be an early warning of systemic issues in relation to service delivery. When handled well, complaints provide an opportunity to continuously improve service levels for all customers.
- i.iii. The HMLR Board commissioned the Customer Care Review Committee ("the Committee") in March 2024, supported by the sponsoring government department MHCLG (Ministry of Housing Communities and Local Government). At the time, a small number of historical complaints had been escalated to the HMLR Board by customers and the review coincided with increasing scrutiny on public sector customer service standards.
- i.iv. The HMLR Board regarded the review as an opportunity for the organisation to rapidly shift towards a culture of operational excellence through continuous improvement, using insight from customer complaints as a catalyst for change.
- i.v. The Committee commissioned a review of a sample of historical complaint cases including those which had been escalated to the HMLR Board. A number of other randomly selected complaint cases were also considered as part of this review. The scope of the review covered customer impact as well as legal and administrative case handling.
- i.vi. A second piece of work was commissioned to undertake an evidence-based analytical review of HMLR's complaints data in order to review customer case handling trends within HMLR more generally. A third review was also undertaken of complaints governance, including IT systems and organisation.
- i.vii. The approach taken by the Committee was for HMLR to implement recommendations as they arose throughout the review period rather than wait for the final report to be issued in 2025.

The role of HMLR

- i.viii. HMLR plays a vital role in the infrastructure of England and Wales through its provision of up to date registers that guarantee property ownership, registration of a property title, a record as to the extent of title to the property and an outline of the general boundaries on the related title plan.
- i.ix. HMLR delivers the land registration process in an administrative capacity. The organisation's main purpose, set down in statute, is one of public service to provide the legal guarantee of title which means that the registers provide legal proof of ownership. Despite a public misconception, HMLR does not determine boundaries due to the "General Boundaries"¹ principle. In summary, HMLR does not decide on disputes between two parties who both make a claim for the same land nor does it have the power to adjudicate disputes about land inheritance. HMLR deals with registration applications on the basis of documents and information provided by the applicant. As long as the application satisfies the legal requirements for registration, the interest must be registered by HMLR as it has a duty to provide an up to date register.
- i.x. Based on the information we have obtained from the systems, each year HMLR receives about 56.6m service requests, which includes around 4.3m applications to change the register, information services, enquiry services and bulk updates. Complaints to HMLR are a very small proportion of the overall customer service requests (0.02% of overall interactions with HMLR).
- i.xi. Complaints at HMLR are defined as "*any expression of dissatisfaction*" either spoken or written and that requires a response. However, as referred to below, investigations found that not all expressions of dissatisfaction were treated as complaints therefore, as with all systems, the data available is only as good as the information input into the system.
- i.xii. In 2023/24 HMLR received a total of 9,111 complaints and the Independent Complaints Reviewer ("ICR")² received 135 complaints. The ICR formally investigated 23 complaints and 6 were upheld. Since April 2024 to the end of December 2024, 5,464 complaints have been received by HMLR.
- i.xiii. HMLR has a highly skilled workforce who show deep expertise and commitment to providing up to date land registers. As at December 2024, HMLR had 6,994 employees including 4,118 case workers.

Legal and Audit External Review

- i.xiv. On behalf of the Committee, Eversheds Sutherland (International) LLP ("ESI") was commissioned to undertake a legal review of 13 historical customer complaint cases. Deloitte was commissioned to undertake an evidence-based analytical review of HMLR's complaints data in order to

¹ Practice guide 40: HM Land Registry plans, supplement 4, boundary agreements and determined boundaries - GOV.UK

² The Independent Complaints Reviewer service **ICR**

review customer case handling trends within HMLR more generally and make recommend changes or improvements to governance, IT systems and processes and staff complaint handling and training within the organisation.

Andrea Cook OBE

- i.xv. The Committee met with the Independent Complaints Reviewer, Andrea Cook OBE during the course of the Committee's work and she attended a meeting to brief the Committee on the role of the Independent Complaints Review Office. Andrea passed away in June 2024 as the work of the Committee was progressing. Members of the Committee would like to acknowledge the contribution she made to improving customer complaint handling at HMLR.

Ann Henshaw

Ann Henshaw
Chair, HMLR Customer Care Review
Independent Non-Executive Director

ii. COMMITTEE CONCLUSIONS

- ii.i. The Committee concluded that there was no evidence of systemic issues which would cause concern regarding complaint management at HMLR. Complaints are a very small proportion of overall service transactions. The nature of HMLR's role means that there will be some dissatisfaction with decisions it makes as their role is to be impartial rather than favour one party over the other.

However, improvements can and must be made in how HMLR discharges this role in order to deliver higher levels of customer service for complainants.

- ii.ii. The Committee accepts the findings in the ESI, Deloitte and governance reviews which have provided many learnings and opportunities for improvement both in the complaints area and more widely at HMLR.
- ii.iii. As the legal review was a small sample of cases chosen to represent the more challenging and long standing complaints which HMLR has been engaged in with customers, and the audit review was narrowed in scope to complaints data due to system constraints, **the Committee recommends that HMLR reviews other similar complaint cases and undertakes a broader analysis of the full customer database. This continued work should be regularly overseen from a governance perspective by a Board subcommittee until completed.**
- ii.iv. **The Committee recommends an audit of randomly selected complaint files is undertaken annually (including Independent Complaints Reviewer cases) for review by the Executive Committee, the Audit and Risk Committee and escalated to the Board as required.**

Historical Complaint Cases

- ii.v. The Committee recognises that in some of the cases that were legally reviewed, a number of minor legal errors were identified which were resolved as the cases progressed; with the exception of one case. The Committee found that in some of the cases resolution took a protracted period of time and that the customer impact and perspective was not always taken into account.
- ii.vi. **The Committee recommends that HMLR offer meetings with the Chief Executive Officer and Chief Land Registrar and the Chair of the Customer Care Review Committee with those complainants whose cases were both in the scope of the 2024 review and continue to be in contact with HMLR.**

Governance

- ii.vii. The Committee found that there was an external "complaints procedure" available on the HMLR gov.uk website but there was not a set of comprehensive complaints policies to underpin the procedure, for use by

HMLR staff and customers.

- ii.viii. The Committee found no single channel for complaints and identified 52 contact entry points for customers making a complaint into HMLR.
- ii.ix. Standard letters and templates used in correspondence were found to be overly legalistic in tone and often not written in plain English. Notwithstanding this, the Committee noted that HMLR holds the Crystal Mark Plain English accreditation. **The Committee recommends HMLR seeks re-evaluation of the Crystal Mark Plain English accreditation by September 2025.**
- ii.x. Customers who complained were not asked at the outset what the root cause of their complaint was or what resolution they were seeking. Multiple complaints were not always recognised as such, and there is no mechanism within the current complaints system to link complaints.
- ii.xi. **The Committee recommends a root cause analysis of complaints is an area for automation in the future. Customers should be able to categorise the type of complaint from a drop down menu available on the HMLR portal or via an App.**
- ii.xii. **The Committee recommends that HMLR updates its Customer Safeguarding policy and also introduces an Employee Safeguarding policy for staff handling complaints.**

Culture

- ii.xiii. The Committee found the culture at HMLR to be quasi legalistic. This was not evidenced in all areas but one of the main themes to emerge was the need for HMLR to transition from a legalistic to a customer service oriented organisation. This is because the process of buying and selling property has undergone significant changes over the past 20 years, shifting from professionally trained conveyancers to more standardised, high-volume based processes. While this works effectively for straightforward transactions, more complex issues are often escalated to HMLR for resolution. Additionally, customers are now more likely than ever to engage directly with HMLR. As a result, HMLR needs to adjust its approach and offer a Business-to-Customer (B2C) service as well as a traditional Business-to-Business (B2B) service.

Organisation

- ii.xiv. There was no centralised complaints handling team within HMLR at the commencement of the review. HMLR responded quickly and in May 2024, a central Complaints Handling team was established with an experienced team of 20 complaints case management staff, headed up by an externally appointed Complaints Service Delivery Lead. Improvements are already being seen and from May to November 2024, the average age of open complaints has reduced by 37.93% from 29 working days to 18 working days. The broader Customer Service Function was also strengthened during the review period with four senior appointments and a cross department Customer Service Forum established to provide greater internal governance.

Information Technology (“IT”) Systems and Interactive Voice Response System (“IVR”)

- ii.xv. Multiple IT systems have been implemented at HMLR over time, leading to a complicated IT estate, including systems that are outdated and not yet decommissioned. This level of complexity has made it harder for staff to navigate complaints and more complex cases.
- ii.xvi. **The Committee recommends urgent investment in IT systems at HMLR for day to day case management and telephony systems (IVR) alongside the digitisation programme which is underway. This is the single biggest enabler to improving complaint handling and customer management services more generally at HMLR.**

General Boundaries

- ii.xvii. In the historical cases review, the Committee found that moving a general boundary to improve the accuracy of the register has increased ambiguity and can have the effect of leaving one party feeling aggrieved with no resolution. In a number of these cases there was limited or no mediation efforts to bring the interested parties to the table to resolve matters. The general boundary principle is key to property transactions but is difficult to explain simply especially when there is a dispute between two parties.

Complaints that arise due to dissatisfaction between two parties regarding a boundary or where HMLR has made a mistake recording a boundary are particularly problematic. If HMLR is satisfied that there has been a mistake and is very clear about what needs to be done to correct the mistake, it may not be able to make the correction unless one of the parties lodges an application and/or HMLR can obtain the agreement of all property-owners affected or there is an order from a first tier tribunal or a court.

- ii.xviii. **The Committee recommends HMLR should seek to secure agreement from all interested parties including use of mediation where possible before non-rectification boundary alterations are made to the Register including situations where HMLR may have made a mistake.**

Independent Complaints Reviewer (ICR)

- ii.xix. The ICR must become fully independent and have accountability for the decisions it makes.

1. **CHAPTER 1: SCOPE AND METHODOLOGY**

- 1.1 In March 2024, the HMLR Board established the Committee to undertake an independent review on the Board's behalf into customer handling procedures and customer experience at HMLR.
- 1.2 Terms of Reference were established and were made publicly available on the HMLR website: [Customer Care Committee TOR - HM Land Registry - GOV.UK](#).
- 1.3 The Committee comprised:
 - 1.3.1 HMLR Non-Executive Directors
 - 1.3.2 Chief Finance Officer HMLR and Board Member
 - 1.3.3 Director of Land Registration Services HMLR
 - 1.3.4 Deputy Director of Customer Service Delivery HMLR
 - 1.3.5 External Committee Adviser representing MHCLG
 - 1.3.6 Customer Service Expert Adviser
- 1.4 In summary the Committee's scope was:
 - 1.4.1 To commission a review by external legal advisers of a small number of historical customer complaint cases, including those where the ICR made recommendations for improvement to customer case handling at HMLR ("External Legal Adviser Review"). Further details of this element of the scope are provided in Chapter 2 below.
 - 1.4.2 To commission an audit by an external third party to review trends within customer case handling at HMLR more generally and make any recommended changes or improvements ("Audit Adviser Review"). Further details of this element of the scope are provided in Chapter 3 below.
 - 1.4.3 To review HMLR's internal governance, policies and procedures as they relate to customer handling, including complaints management, IT systems and organisation structure ("Governance, Policies and Procedures Review"). Further details of this element of the scope are provided in Chapters 4 and 5 below.
- 1.5 The review period of the Committee was from the 1st March 2024 to 31st December 2024 with a presentation of findings and recommendations to the HMLR Board at the end of January 2025.
- 1.6 The approach taken by the Committee was for HMLR to implement recommendations as they arose throughout the review period rather than wait for the final report to be issued in early 2025.

2. CHAPTER 2. EXTERNAL LEGAL ADVISER REVIEW

Background

- 2.1 As set out in Chapter 1, part of the Committee's scope was to commission external legal advisers to review 13 historical customer complaint cases. Eversheds Sutherland (International) LLP ("ESI") was commissioned to undertake the legal review in accordance with the terms of the framework document attached at Appendix A ("the ESI Review"). After completing its review of the 13 cases and determining the findings (as set out in this Report), in February 2025 ESI was asked to review a further case. This case consisted of new complaints that had been received from one of the complainants of the 13 cases already considered, although unconnected to the subject of any of those 13 complaints. The complaints in the new case file do not fall into one of the categories at paragraph 2.5 below and the complaints are ongoing, therefore the findings from the review of that case file does not form part of this Report. The Committee however wanted the case to be reviewed to consider if any further learning could be gained. The findings have been kept separate to the main Eversheds Report. This is known as "Case 14".
- 2.2 The ESI report runs to 536 pages in total with all appendices. Given the level of detail, including personal data, included within the individual case reports prepared by ESI, it is not appropriate for HMLR to publish them all. The main report containing ESI's finding is available in full but the appendices will not be published.
- 2.3 When reviewing each of the 13 cases, ESI were tasked with considering if:
- 2.3.1 The legal decision was correct;
 - 2.3.2 The customer complaints policy was correctly applied; *and*
 - 2.3.3 The contact closure policy (formerly the disengagement policy) was correctly applied.³
- 2.4 The Review was also intended to identify whether the customer impact and perspective were fully and properly considered during the complaints decision-making process, and whether an industry best practice approach was adopted to ensure a proportionate and appropriate outcome for the customers involved.
- 2.5 The main purpose of the ESI Review was to provide legal advice in relation to the decisions made on the 13 cases and in particular to identify whether there was any evidence of systemic malpractice or injustice. The 13 cases considered as part of the ESI Review fell into three separate categories of complaint:

³ The 'disengagement policy' was introduced to cease contact with complainants when it was considered there was nothing useful that could be added to what had already been said or that the complainant's behaviour was unreasonable.

- 2.5.1 ICR (Independent Complaints Reviewer) cases;
- 2.5.2 Maladministration; *and*
- 2.5.3 Customer contact closure.

- 2.6 The Committee also requested ESI make recommendations to assist HMLR in improving its customer handling processes in line with industry best practice.

Methodology

- 2.7 Cases considered for selection were long running, contentious or identified as poorly handled by HMLR. Some cases fell across all three of the above categories. Nine of the 13 cases were complaints selected at random, with the final five being recommended by the Committee for review. It was the deliberate choice by the Committee and HMLR to focus on cases which had not been handled well in order to maximise the opportunity to improve processes and identify any malpractice.
- 2.8 HMLR provided ESI with electronic copies of the files relating to the 13 cases and, in respect of three of the longest running cases, hard copy documents were provided and digitised for electronic review. ESI was not provided with access to HMLR systems as part of their Review and relied on the HMLR legal team to provide the relevant documentation for each case.

Key Findings

- 2.9 The ESI Review concluded that the cases reviewed did not indicate any fundamental issues that caused significant concern. There were, however, learnings and opportunities for improvement to be derived from the ESI Review, and appropriate recommendations were made. This includes findings concerning the accuracy of some elements of the legal decisions, although they were considered minor discrepancies and not significant failures.
- 2.10 Of the 13 cases, ESI identified three where the initial legal decisions made were incorrect and three where the initial legal decisions were partially correct. Of the three with incorrect legal decisions, these were discrepancies that were capable of correction. In the first, it was acknowledged by HMLR that they had incorrectly registered part of the customer's land, however, there remains an error on the title register in this regard pending a further application. In the second and third it was maintained that the decision of the Land Registrar was final and could not be altered "*under the Land Registration Act 2002*" when this was not the case, as the review process was part of internal HMLR processes rather than being required by legislation.
- 2.11 In respect of the three partially correct legal decisions, one related to a neighbour not being informed of an application made in respect of adjoining land; one related to incorrectly registering a charge; and one

related to, what is considered by ESI to be, a too narrow interpretation of the application of restrictive covenants.

- 2.12 In 12 of the 13 cases reviewed, save for extending the duration of the complaints, and potentially the stress associated with pursuing a complaint, these incorrect or partially incorrect decisions had no significant impact on the outcome of the complaint or the integrity of the register and were resolved, although it took a great deal of time to resolve three of the complaints.
- 2.13 In addition to the above, ESI concluded that there were
 - 2.13.1 some considerable delays in responding to complaints, which only served to extend the duration of contact from customers.
 - 2.13.2 Evidence of potential conflict of interest with HMLR staff who were involved in the subject of the complaint ultimately also responding to the complaint;
 - 2.13.3 Concerns regarding the tone and clarity of responses sent to customers;
 - 2.13.4 Examples of caseworkers adopting a rigid approach, not considering the wider picture in respect of what the core issues were and whether there were relatively straightforward ways of seeking to resolve the complaint;
 - 2.13.5 Gaps in correspondence, likely to be as a result of information being held across multiple systems; and
 - 2.13.6 A lack of consideration for customer's potential vulnerabilities.
- 2.14 ESI drew out the inherent imbalance of power that exists between the customer and HMLR with, on occasion, the only recourse for a customer being a legal challenge. As a public service provider, HMLR needs to be mindful of this imbalance of power. Its main purpose when dealing with complaints should be resolution and effective communication with the complainant and other customers affected by the case.
- 2.15 However, during the course of the ESI Review, examples of good practice and positive behaviours were also identified which resulted in more expeditious settlement of complaints.
- 2.16 **As the legal review was a small sample of cases, the Committee recommends that HMLR appoints a member of staff within the organisation to review other similar cases.**

3. CHAPTER 3. EXTERNAL AUDIT ADVISER REVIEW

3.1 Deloitte was commissioned to undertake an analytical evaluation and audit of complaints data at HMLR including:

3.1.1 An initial interrogation of the way HMLR currently categories customer complaints;

3.1.2 Identification of common trends that may occur with the complaints data; and

3.1.3 An exploratory assessment of the customer complaints handling process

3.2 A summary of the Deloitte Review is below.

Positive Introduction of Central Complaints Team (CCT)

3.3 As part of an objective to improve complaint handling, HMLR introduced a Customer Complaints Team (CCT) in May 2024 with a new Complaints Service Delivery Lead externally recruited to manage the team. The ambition of this team is to:

3.3.1 Improve consistency of complaint handling processes and outcomes;

3.3.2 To better manage the service level agreements (SLAs) that HMLR has set for itself to process complaints (20 working days from date of receipt of complaint); and

3.3.3 To provide customers with a better experience in the event they have raised a complaint to HMLR.

3.4 The introduction of the CCT is a positive step for HMLR in improving customer service, and has anecdotally started providing more control and consistency in complaint handling.

3.5 **The Committee recommends HMLR undertake a review of the Central Complaints Team Capacity and capability.** To establish a consistent and high-quality approach to complaint handling, the CCT should continue to develop as the central hub of expertise for complaints. This requires ensuring the team has sufficient resource capacity to manage the inflow of complaints effectively.

3.6 **The Committee recommends HMLR review the Central Complaints Team Leader spans of control.** Managers with too many direct reports can struggle to provide adequate coaching, guidance, and support, leading to decreased team engagement, productivity and development.

3.7 **The Committee recommends HMLR undertake a consolatory and compensatory payment review.** While HMLR currently offers

consolatory payments for complaints, a review is recommended to formalise a structured framework.

- 3.8 **The Committee recommends HMLR undertake a benefit analysis of specialisation of Lawyer Teams.** This targeted distribution of expertise allows lawyers to develop specialised knowledge and enhance the team's overall effectiveness.
- 3.9 **The Committee recommends HMLR standardise the approach to customer contact within Lawyer Teams to provide a more consistent approach to complaint handling and help maintain complaint handling timescales within the SLA.**
- 3.10 **The Committee recommends HMLR provide access to complaints information for Account Managers.** This would help mitigate the risk of complaints being overlooked, providing Account Managers with either direct access to complaint information within the Dynamics complaints recording system, or establishing a formal process for regular updates on complaint progress.

The categorisation of complaints is sub-optimal

- 3.11 The system used to record complaints, Dynamics, has two 'Category' sections; one of these, the 'Classification Category' has 230 different options available, many of which are used very rarely. This field is 'inherited' from the use of Dynamics for enquiries. The other field, 'Zone Category' has a more condensed list at 35, and is more appropriate for complaints. Deloitte's analysis of complaint categorisation identified that some of these are similar in nature, and that there are other potential categories not in the list, which should be included (such as incorrect cancellation of applications). It is important that the categories used to segment complaints reflect the breadth of complaints received, as this supports complaint root cause analysis (RCA) and identifying opportunities to improve services and customer experience.
- 3.12 **The Committee recommends HMLR remove 'Classification Category' for complaints.** This does not provide sufficient information on reasons for complaints.
- 3.13 **The Committee recommends HMLR rationalise the complaint categories ('Zone Categories').**
- 3.14 **The Committee recommends HMLR enable a selection of multiple complaint categories on a single complaint record.** This will help to improve Management Information (MI) and provide further insights into the reasons for complaints.

Complaint handling procedures are not well documented

- 3.15 No full complaint handling guidance document or Standard Operating Procedures have been identified or presented during the Review. Deloitte would have expected to see a guidance document, which

provides instructions on how a complaint should be identified, logged, the appropriate data gathered, investigated (based on the category of complaint / complaint points raised), decisioned and redressed (if relevant). Standard Operating Procedures help drive consistency and quality of output, supports change control and makes onboarding of new joiners easier.

- 3.16 **The Committee recommends HMLR develop supporting guidance and Standard Operating procedures for Complaint Handling and on the use of categories.** This will help to provide consistency for call handling and categorisation of complaints.
- 3.17 **The Committee recommends HMLR develop a more prescriptive structure for complaint responses.** To ensure consistency and clarity, HMLR teams should develop and implement a unified structure for complaint responses, drawing inspiration from models like the Financial Ombudsman Service (FOS) model.
- 3.18 **The Committee recommends HMLR develop Standard Operating Procedures (SOPs) for the end-to-end complaint handling process.** This will improve the time taken to process complaints and provide a standardised approach for customers.

Training is inconsistently delivered

- 3.19 There are a series of good training materials that have been developed to cover identification of complaints and complaint handling processes. This training is delivered to individuals who are likely to be directly involved in complaint handling (those in the Customer Complaints Team (CCT), Customer Resolution Team (CRT) and Customer Service Centre (CSC)). Training for other colleagues across HMLR who may interact with customers and therefore be responsible for identifying or contributing to complaint resolution, is inconsistent – in some instances delivered many years ago, and in some instances not delivered at all.
- 3.20 **The Committee recommends mandatory complaint handling training should be delivered to all front line teams on how to identify complaints, emphasising the Parliamentary and Health Service Ombudsman (PHSO) standards.** This should be refreshed on an annual basis, with record-keeping on completion by individual.
- 3.21 **The Committee recommends HMLR provide training on Parliamentary and Health Service Ombudsman (PHSO) standards for all operational / service delivery teams.** Structured training on complaints and the PHSO standards should be given to teams outside of CCT to ensure there is buy-in from all teams to support the overall vision for complaints processing at HMLR.
- 3.22 **The Committee recommends HMLR develop detailed complaint handling learning programmes for Customer Service Centre/Customer Complaints Team.** HMLR must deploy further

training and continued learning programmes for CSC/CCT which focus on responding to complaints, utilising a central repository of templated complaint responses, combined with a stronger understanding of how to tailor these based on the complaint points raised by the customer.

- 3.23 **The Committee recommends HMLR develop the guidance and training on how to search Dynamics.** This guide would outline a prioritised sequence of search criteria, starting with the most efficient and progressively moving to broader parameters, streamlining the customer identification process.

Quality frameworks could be strengthened

- 3.24 There is no Quality Framework within the CCT, and there is also no quality assessment of complaints resolved by other teams within HMLR. There are quality assessments within teams, such as the CSC team receiving 4 quality reviews on calls and 2 quality reviews on written correspondence per month (which would equate to approx. 1% of customer interactions). Within a typical Quality Framework, Deloitte would expect to see three different functions of quality management: Quality Control (management of individual quality and risk-based control), Quality Assurance (independent review to assure adherence to processes) and Outcome Testing (holistic review of customer outcome).
- 3.25 **The Committee recommends HMLR improve controls and Quality Assurance of complaint handling.** Based on the variance in uphold rates between complaint handlers, there could be some inconsistent application of complaint handling guidance.
- 3.26 **The Committee recommends HMLR review the Quality Assurance framework for customer-facing teams.** Review and assess if the Quality Assurance framework is fit for purpose for customer-facing teams (e.g. CSC and CRT). Implementing a robust quality framework will enable comprehensive tracking of this metric, establishing it as a formal quality SLA and facilitating data-driven performance monitoring and improvement initiatives.
- 3.27 **The Committee recommends HMLR introduce a Quality Assurance framework into the Customer Complaints Team.** The Quality Assurance framework should complement other risk management practices that HMLR employs e.g. internal audit.

Data is stored in multiple systems

- 3.28 Through their investigation into the complaints process, Deloitte identified that there were multiple systems being used for different actions which can lead to a fragmentation of data, and/or duplication. For example, correspondence with a customer on a complaint is held in Dynamics, whereas other HMLR correspondence with a customer is on FACS (File and Correspondence Storage). Similarly, any internal actions or notes recorded on a complaint are held in Dynamics, whereas other notes

relating to an application or customer is held on the Points Arising Screen (PAS). Data being held in multiple systems can lead to productivity inefficiencies where data has to be rekeyed from one system to another and constrains the ability to conduct meaningful analysis on customer interactions.

- 3.29 **The Committee recommends HMLR streamline communication entry points to HMLR.** Explore which communication channels can be consolidated, specifically reducing the number of telephone lines and email addresses where communications (and thus complaints) can be received. This centralised approach will minimise the risk of missed correspondence and complaints.
- 3.30 **The Committee recommends HMLR improve communications to customers of available complaint channels.** HMLR should explore enhancements to the HMLR complaint page by simplifying language in key sections ("Data service complaints," "Local Land Charges complaints," and "Action through court"), replacing technical terms with clear explanations.
- 3.31 **The Committee recommends HMLR review the outbound correspondence system.** Addressing the technical issues associated with the outbound correspondence system should be prioritised to ensure a polished and consistent presentation for all customer communications.

The use of Dynamics (complaint management system) is sub-optimal:

- 3.32 Microsoft Dynamics is the system used for managing complaints at HMLR, as well as used for recording of enquiries from customers. Dynamics has some good features and controls in place to help manage complaints across HMLR; for example, user-based access with queues, so that colleagues only see complaints relevant to them, and the ability to move complaints through a workflow process. There are areas in which the systems used for complaints could be improved; for example, introduction of a diary management function where colleagues can set notifications for when they should return to a case. Furthermore, some anecdotal feedback suggested that Dynamics is not user-friendly, for example, in the screens where customer correspondence is developed, or when looking for linked enquiries and/or complaints.
- 3.33 **The Committee recommends HMLR introduce a referral count within Management Information as a control.** Introduce controls and interventions when the referral counter for a complaint exceeds a set number. This would help prevent excessive delays caused by complaints moving between teams and potentially causing undue delays to the customer resolution.
- 3.34 **The Committee recommends HMLR review the Dynamics fields for effectiveness.** To ensure they are useful and provide benefit for the

complaint handler time to complete, and also to ensure that metrics which may be useful for future analysis are captured.

- 3.35 **The Committee recommends HMLR review the linked case search functionality in Dynamics.** This guide would outline a prioritised sequence of search criteria, starting with the most efficient and progressively moving to broader parameters, ultimately streamlining the customer identification process.
- 3.36 **The Committee recommends HMLR deploy enhancements to Dynamics to better improve user functionality.** Specifically, this includes revisiting the 'Reply Requested' auto-closure function, reviewing and enhancing the 'Timeline' functionality, and implementing a diary management function. HMLR should deactivate the ability of systems users to inadvertently close down a complaint, a feature which is still live in Dynamics.
- 3.37 **The Committee recommends HMLR undertake a cost benefit analysis of Dynamics licences.** Providing caseworkers with access to Dynamics would reduce document sharing via email and could significantly enhance efficiency and reduce risk of oversight.
- 3.38 **The Committee recommends HMLR undertake a user and process requirements review of Dynamics.** To effectively align user needs with system capabilities, Deloitte recommend a review process that includes focus groups to gather user feedback on desired improvements and consultations with Dynamics product owners to confirm the feasibility of implementing these changes within the system's technical constraints.

Limited Root Cause Analysis and Insight complaint Management Information

- 3.39 Whilst there is available data on complaint reasons through the 'Zone Categories,' Deloitte did not see the use of Management Information ("MI") to provide analysis to relevant stakeholders within HMLR on the main complaint reasons, the root causes of these, and the actions being undertaken to address the complaint points. Power BI dashboards do exist on the HMLR systems, which allow users to self-serve MI on complaints, and whilst these do provide information on categories of complaints, these do not show comparison between categories, trends, or outcomes by category.
- 3.40 **The Committee recommends HMLR introduce a formal Root Cause Analysis (RCA) process for complaints.** RCA is a powerful tool for improving complaints management as it moves beyond treating symptoms to identifying and addressing the underlying causes of complaints. By understanding the systemic issues driving complaints, HMLR can implement targeted solutions that prevent similar complaints from recurring, leading to improved customer satisfaction, reduced complaint handling costs, and enhanced operational efficiency.

Complaints workflow and prioritisation is misaligned to good industry practice

- 3.41 Despite the recent implementation of the CCT, complaints are still occasionally handled by other areas within the organisation, such as Land Registration Lawyers, Citizens Teams, and Team Managers. Ideally, industry best practice suggests that a CCT should serve as a central point for all complaints, ensuring consistent processing and resolution. Additionally, the lack of a formal triage process to direct complaints to specialised teams may further hinder efficient and effective resolution.
- 3.42 **The Committee recommends HMLR introduce a complaint triage process.** Introduce a complaint triage process which aims to categorise new complaints as they are received, ideally within 1 or 2 working days after receipt.
- 3.43 **The Committee recommends HMLR sample review Enquiries to establish if there are any 'missed' complaints.** A sample review of enquiries and Case Worker output (undertaken at a statistically significant sampling rate) could help to identify if there are instances where customer dissatisfaction may not have been formally logged as a complaint.
- 3.44 **The Committee recommends HMLR introduce complaint update communications for customers.** Proactive update communications to customers during the complaint process help set clear expectations and provide a more personalised experience, often resulting in higher customer satisfaction scores.

4. **CHAPTER 4. GOVERNANCE, PROCESS, PROCEDURES, POLICIES AND IT SYSTEMS**

- 4.1 The Committee reviewed the complaints' governance, process, procedures and policies, including legal governance documents regarding complaint handling. The Committee found that there was an external "complaints procedure" available on the HMLR gov.uk website but there was not a set of comprehensive complaints policies to underpin the procedure.
- 4.2 ESI found at the time of their Review that there was no standard complaints form. A standard complaints form was introduced during the course of the committee's work.
- 4.3 **The Committee recommends that HMLR develop and publish a Customer Charter.**
- 4.4 **The Committee recommends that HMLR put a comprehensive set of policies in place to support the complaints procedure and training is given to staff by June 2025.**
- 4.5 **The Committee recommends that Complaint Policies should also be made available externally to customers on the HMLR gov.uk website to support the procedures in place.** In addition, clear explanations of key approaches such as in relation to the Complaints procedure, General Boundaries, links to the ICR and Ombudsman processes and other relevant material should be made available on the HMLR gov.uk website.
- 4.6 The Committee reviewed the customer complaint journey from Stage 1 (as defined in the complaints procedure), through Stage 2 and through to the ICR, Parliamentary and Health Service Ombudsman ("PHSO") and Judicial Review. There is relatively little information in respect of how the complaint will be considered or what will happen at Stage 1 or 2 or further on in the process.
- 4.7 The Committee found no single channel for complaints and identified 52 contact entry points for customers making a complaint into HMLR.
- 4.8 **The Committee recommends that a new simplified customer complaints journey with minimal customer complaint entry points to HMLR (reduced from 52) to be in place by June 2025.**
- 4.9 **The Committee recommends all complaints correspondence and information be centralised in one easy to access complaints management system.**
- 4.10 **The Committee recommends that HMLR updates its Customer Safeguarding policies and that the telephony system (IVR) is set up through the use of modern identification software to identify customers with vulnerabilities or those who need additional help.**

- 4.11 The Committee found that an area which caused complaint escalation and stress for customers in the historical complaints that were reviewed was the “disengagement policy.” The ‘disengagement policy’ was applied when a customer was told that correspondence would unilaterally end as determined by HMLR. The approach has now been replaced by a more appropriate “Contact Closure” policy. Use of the term “disengagement” in the historical cases proved to be highly charged because it was the “customer” that HMLR disengaged. The Committee found that this had the propensity to create a deep personal and emotional impact on the individual. The review also showed that despite the use of the disengagement policy, most complainants continued to re-connect and remained in regular contact with HMLR.
- 4.12 **The Committee recommends the Contact Closure policy should be discontinued; complaints should remain open until they are fully and satisfactorily closed.**
- 4.13 **The Committee recommends the Executive Team regularly review complaints and complaint trends against a set of Key Performance Indicators (KPIs).**
- 4.14 Board governance for customer complaints is the responsibility of the Audit and Risk Committee. This committee reviews complaints that are escalated to the ICR and reviews the annual ICR reports. The ICR annual reports are also shared with the Main Board annually.
- 4.15 The Committee found that too often customers who complain were not asked at the outset what their specific complaint was about or what resolution they were seeking. Multiple complaints were not always recognised as such, and there is no mechanism within the current complaint systems to link complaints.
- 4.16 The Committee noted that there was no mediation or appeals process in place for complaints.
- 4.17 The Committee reviewed standard letters and documents used as templates for different types of complaints. A recurring theme emerged that standard letters and templates used in correspondence were not written in plain English. References were often cut and pasted from a set of around 80 practice guides which had been written for conveyancers and contained legal jargon.
- 4.18 **The Committee recommends that all standard letters, templates, practice guides should be written in plain English.**
- 4.19 **The Committee recommends standard correspondence letters to customers are reformatted.** The formatting of letters is legalistic with only the right hand side of the page used, giving the impression of a formal and legalistic letter.

4.20 Once a complaint is routed to legal teams, a “full legal position” is always sent to the complainant when a simpler customer service response answering the questions raised may have been sufficient.

4.21 The Committee reviewed complaint escalation and de-escalation procedures.

The Committee reviewed the ICR reports for the past 5 years and meeting minutes from the Independent Complaints Reviewer Evaluation and Study Team (“ICREST”), which is a separate joint ICR and HMLR meeting group.

4.22 The Committee considered the Principles of Good Complaint Handling | Parliamentary and Health Service Ombudsman (PHSO) and requested HMLR complete an assessment of their complaint practices using the PHSO Complaints Maturity Assessment Tool. The assessment tool gave a rating of Early Progress based on a self-assessment led by the newly appointed HMLR Complaints Service Delivery Lead. This was an expected outcome as the complaints area had been only recently been put in place at the time.

4.23 **The Committee recommends HMLR work to achieve a target of Firm Progress by the end of 2025 and set a target of a Mature rating across all areas of the PHSO maturity matrix by the end of 2027.**

4.24 **The Committee recommends that Parliamentary and Health Service Ombudsman complaints management principles should continue to be used as a framework. The results of regular annual assessments (both self and external) should be reviewed annually by the HMLR Audit and Risk Committee.**

IT and Telephony Systems

4.25 HMLR requires a simple, modern, integrated complaints management system which has one repository for all complaints information and can be accessed easily by all relevant caseworking and legal teams. The requirement to re-key or download complaint case data must be eliminated.

4.26 The overall IT system needs to be fit for purpose allowing strong data analysis with simple dashboards for day to day operational management to enhance customer experience.

4.27 **The Committee recommends HMLR establish a clear set of Key Performance Indicators (KPIs) for delivery of fit-for-purpose IT systems.**

4.28 The Complaints at HMLR are currently received through webforms, voice, email, post and social media, the latter two being minimal. Webform (including website “contact us” and portal contact) is the most common with almost 50% of complaints received via this channel.

- 4.29 The Committee found that some teams needed greater access to systems like Dynamics. However, the high cost of the license prevented this, leaving some essential users without access.
- 4.30 **The Committee recommends that HMLR ensure staff have the required systems access.**
- 4.31 The Committee found that the telephony (“IVR”) system was not fit for purpose and industry standard investment decisions are required to upgrade it to ensure faster and better service outcomes for customers. There is currently no live agent facility, complaint option or identification software in use to identify and triage customers who need more help. Handlers cannot always seamlessly transfer calls to colleagues. A ring back option has now been introduced.
- 4.32 **The Committee recommends that HMLR implement a modern Interactive Voice Response (IVR) system which allows the transfer of calls seamlessly across the department.** There should be an option for complaints to be raised on the IVR which are directed immediately to the complaints team and identification software installed for customers who display vulnerabilities or require greater assistance with their enquiry or case.
- 4.33 Navigation of the multiple systems for case workers and complaint handling staff, in particular for new staff, is complex and requires additional training.
- 4.34 More generally, the systems complexity has made reporting on performance and other forms of data insight unavailable. It proved impossible to draw data sets more generally from the overall customer database at the commencement of this review. As a result, the scope of the data extraction analysed was narrowed to complaints data rather than the general customer database.

5. CHAPTER 5: CULTURE AND ORGANISATION

Culture

- 5.1 The Committee found that the culture at HMLR can be described as quasi-legal. Until relatively recently, the conveyancer was the principal customer of HMLR as the vast majority of transactions were administered through property lawyers or licensed conveyancers to ensure the legal process for transferring property ownership was undertaken. Over the years, this had the effect of embedding a more legalistic than customer service oriented culture within HMLR.
- 5.2 The process of buying and selling property has undergone significant changes over the past 20 years, shifting from professionally trained conveyancers to more standardised, high-volume based processes. While this works effectively for straightforward transactions, more complex issues are often escalated to HMLR for resolution. Additionally, customers are now more likely than ever to engage directly with HMLR. As a result, HMLR needs to adjust its approach and focus on offering a Business-to-Customer (B2C) service as well as a traditional Business-to-Business (B2B) service.
- 5.3 **The Committee recommends a cultural programme to support the organisations move towards a Business-to-Customer (B2C) service model.**
- 5.4 Caseworkers also face challenges with the level of inaccurate documentation sent in by conveyancing firms. The avoidable requisition⁴ rate has increased. Today the current overall range of avoidable requisitions is 5-25% with professional customers at the lower end (5%). Administrative errors place a huge burden on HMLR caseworkers who need to be highly vigilant in spotting and correcting errors or returning documents to be updated which causes further processing delays.
- 5.5 **The Committee recommends HMLR work closely with conveyancers to put systems and processes in place to provide accurate customer identity and property information first time to HMLR in order to significantly reduce the overall number of avoidable requisitions.**
- 5.6 The case for change is compelling. 48% of all information services requests to HMLR are from the general public. 41% of all information services relate to Property Summaries that are automated via Search for Land and Property on gov.uk and accessed by the general public. Additionally, over 50% of all complaints are received from the general public rather than a legal representative.

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A formal request for information when an application is incomplete, inaccurate or has missing information

- 5.7 The Committee also found a “culture of acceptance” within the organisation meaning that staff are so accustomed to managing with complex systems and tools they are provided with to do their jobs, they don’t automatically question whether an improvement could be made which would benefit the customer and improve day to day working practices.
- 5.8 It is worth noting that culturally there is an inherent imbalance of power that exists between the customer and HMLR. As a public service, HMLR needs to be mindful of this imbalance of power. HMLR needs to create a more balanced relationship with customers ensuring there is an orderly way of resolving issues. When needed HMLR will need to strive towards making the organisations better for customers, simpler for the colleagues in HMLR to deliver that great service and ensure this is done in an affordable manner whilst delivering public value.

Organisation

- 5.9 At the commencement of the Committee’s work there was no central complaints team in place in HMLR. Previously complaints were handled across Service Delivery, Customer and Strategy, Corporate Services Lawyers and Transformation and Technology Data Services with no clear accountability or management structure in place.
- 5.10 In May 2024, a central Complaints Handling team was established with an experienced team of 20 complaints case management staff, headed up by an externally appointed Complaints Service Delivery Lead. Improvements are already being seen and from May to November 2024, the average age of open complaints has reduced by 37.93% from 29 working days to 18 working days.
- 5.11 The broader HMLR Customer Services organisation has also been strengthened throughout the year with four senior leadership appointments: Director of Land Registration Services, Deputy Director of Customer Services Delivery, Director Service Delivery and Deputy Director of Land Registration Lawyers.
- 5.12 Despite good progress to increase teamwork between legal service and customer service caseworking teams, the Committee observed teams working quite independently of each other in some locations.
- 5.13 The Committee found that certain customer operational areas for customer policy and customer engagement/management sit outside the main Customer Directorate organisation.
- 5.14 The Committee found that the Chief Executive and Chief Land Registrar have no direct role in the complaints procedure and responsibility to deal with registration decisions have been delegated to the local Land Registrar at each regional office. **The Committee recommends the formal delegation of authority for HMLR**

complaints management is allocated to the General Counsel Executive Team Member.

- 5.15 The Committee welcomed the establishment of a new internal “Customer Forum” committee to provide greater internal governance.
- 5.16 **The Committee recommends an organisation review should be undertaken by June 2025 to assess whether any teams should be relocated inside the main Customer Service Directorate to foster greater collaboration and Service Delivery.**

6. CHAPTER 6. BOUNDARY DISPUTES

- 6.1 Despite its main purpose as administrator of the register of title and other registers, HMLR does on occasion become involved in disputes and/or receive complaints in certain circumstances related to boundary disputes. Complaints of this nature broadly fall into three main categories:
- 6.1.1 complaints about HMLR's handling of a case and/or maladministration;
 - 6.1.2 dissatisfaction arising from a dispute between two parties (generally boundary disputes); or
 - 6.1.3 dissatisfaction with a registration decision that HMLR has made.
- 6.2 Complaints that arise due to dissatisfaction between two parties regarding a boundary or where HMLR has made a mistake recording a boundary are particularly problematic. If HMLR is satisfied that there has been a mistake and is very clear about what needs to be done to correct the mistake, it may not be able to make the correction unless one of the parties lodges an application and/or HMLR can obtain the agreement of all property-owners affected or there is an order from a first tier tribunal or a court.
- 6.3 Red title boundary lines on the register are likely to be interpreted by customers with a false sense of precision. There are in essence two types of boundaries: general boundaries and determined boundaries.

General boundaries

- 6.4 The majority of registered boundaries are drawn pursuant to the general boundaries rule under section 60 (1) of the Land Registry Act 2002⁵. This provides for a zone of uncertainty around the red line in which the legal boundary of a title may lie. The general boundary rule was devised to preserve ambiguity and avoid disputes at the point of initial registration.

Determined boundaries

- 6.5 Unlike general boundaries, a determined boundary shows “the exact line of the boundary of a registered estate.” HMLR does not determine a boundary in the sense of resolving disagreement as to where the exact line of the boundary is located. Instead, with the exact line having been identified, HMLR will then make it apparent from the register that the boundary has been determined.⁶

⁵ [Section 60 and Registration Act 2002](#)

⁶ [Practice guide 40: HM Land Registry plans, supplement 4, boundary agreements and determined boundaries - GOV.UK](#)

Alteration of a General Boundary

- 6.6 There are circumstances in which HMLR makes an alteration of a general boundary within the zone of uncertainty on the basis of improving the accuracy of the register. HMLR is able to do this without the agreement of either or both affected parties.
- 6.7 In comparison, moving a boundary beyond the zone of uncertainty falls under the definition of ‘rectification’⁷ and involves the transfer of land from one title to another. HMLR cannot make a rectification alteration without agreement of all parties affected or pursuant to an order from a Tribunal or Court.
- 6.8 The decision about whether an alteration constitutes rectification or an improvement in accuracy, and the decision about whether to subsequently move a boundary to improve accuracy, are subject to the judgement of HMLR. When exercising this judgement, HMLR can become embroiled in protracted disputes with property owners who often regard HMLR as having become an interested party and naturally see HMLR as being at fault. However, once it has reached this point, HMLR has limited options or flexibility around the extent to which it can further alter a boundary.
- 6.9 In these cases, HMLR sometimes asks the complainant to make a formal application for re-alteration of the register so that any dispute can be referred to the Tribunal, which heightens a sense of asymmetric treatment and injustice but provides more certainty and protection for HMLR.
- 6.10 This issue has been identified by the Committee as standing out in the historical cases reviewed and was highlighted as an issue in a Law Commission report as far back as 2001.⁸
- 6.11 The Committee has considered the ongoing risk to HMLR of exposure to legal challenges arising from non-rectification boundary alterations in the context of HMLR’s responsibility to maintain the Register efficiently and keep it up to date. The Committee recognises that primary legislation is unlikely to be either a proportionate or practical solution to the issue but the following areas have been discussed:
- 6.11.1 Non-rectification boundary movements within the general boundary rule (i.e. accuracy improvements including where HMLR may have made a mistake) are highly likely to cause confusion and distress to customers but conclude that the low incidence requires the Committee’s recommendation to be

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[Practice guide 39: Rectification and Indemnity - GOV.UK](#)

8

[Land Registration for the 21st Century: A Conveyancing Revolution \(LC271\)](#)

limited to an application of greater vigilance and caution by HMLR in such cases.

- 6.11.2 Non-rectification boundary alterations for accuracy, including where HMLR may have made a mistake within the general boundary rule, are no longer permitted unless there is agreement from all affected parties. This would suggest that the process for 'accuracy' boundary changes should replicate some or all of the process that applies to rectification. An important consideration is whether HMLR should cover customers' costs, particularly in circumstances where a mistake is acknowledged to have been made by HMLR.
- 6.11.3 Greater use of boundary mediation services either through an internally appointed HMLR role or by subcontracting the service to a third-party organisation, allowing principal parties to retain control over the resolution process, facilitating mutual agreements without the need for litigation.
- 6.12 **The Committee recommends HMLR should seek to secure agreement from all interested parties including use of mediation where possible before non-rectification boundary alterations are made to the Register including situations where HMLR may have made a mistake.**
- 6.13 **The Committee recommends that where HMLR has made a mistake around boundaries, HMLR should consider covering costs, replicating the indemnity provision for rectification.**
- 6.14 **The Committee recommends that an external communication and media programme is put in place to increase public awareness of the "general boundary" provision, as it is so key to property ownership.**

7. CHAPTER 7. INDEPENDENT COMPLAINTS REVIEWER (ICR)

- 7.1 The ICR Office provides an independent complaints review service for HMLR. They do not investigate complaints about any other organisation. Anyone (including members of the public, businesses and professional advisers) may refer a complaint to the ICR. The ICR can instruct HMLR to make consolatory payments and to consider compensatory payments.
- 7.2 The main role of the ICR is to provide a free, effective and impartial complaints review and resolution service. The aim is to settle complaints in a proportionate manner and to make a positive difference for all those who use HMLR's service.
- 7.3 It is important to note that the ICR cannot consider disputes about official decisions made by HMLR or legal matters. The ICR is not a part of the management structure of HMLR. Its services are free to complainants.
- 7.4 The Secretary of State for Housing, Communities & Local Government independently appoints the ICR.
- 7.5 The ICR's annual report produced at the end of the business year is published externally and reflects reports, themes and issues from complaints referred to it during that year. It is reviewed by the Audit and Risk Committee, the HMLR Audit and Assurance Group and the HMLR board.
- 7.6 In a few of the cases reviewed, it was noted that the impartiality of the ICR office was called into question by complainants. This is because the staff in the ICR office are long term secondees from HMLR, are paid through the HMLR payroll and have direct access to HMLR IT systems.
- 7.7 **The Committee recommends that ICR employees should be situated in a separate independent organisation and more formal governance arrangements put in place between the two organisations.**
- 7.8 The Committee concluded that the ICR is only able to deal with a narrow remit of cases relating to maladministration, which were as a result of failures in service standards and problems or concerns caused by the actions of HMLR staff.
- 7.9 The Committee was also concerned that the perception of customers who complain to the ICR is that their full case (including legal decisions) would be reviewed when it is not.
- 7.10 The Committee welcomes the ICR as a positive component of the escalation procedure for complaints but that it is only relevant to a small

proportion of the complaints made to HMLR on an annual basis due to the current scope and set of responsibilities.

- 7.11 **The Committee recommends a formal consultation between MHCLG and HMLR takes place on the scope and responsibilities of the ICR and its authority. Clarity on the ICR's roles and responsibilities, once confirmed, should be published on HMLR and ICR websites.**

8. CHAPTER 8. PRINCIPAL FINDINGS AND RECOMMENDATIONS

The Committee recommends that HMLR reviews other similar complaint cases and undertake a broader analysis of the full customer database. This continued work should be regularly overseen from a governance perspective by the Customer and Change Board subcommittee until completed.

The summary table below presents the Committee's recommendation and gives a reference to the section in the main report or appendix where the finding is noted.

EXTERNAL LEGAL ADVISER REVIEW

Recommendations	Reference
<ul style="list-style-type: none">• A Full Report of findings and recommendations from the ESI Legal Advisor Review can be found in Appendix A.• The Committee accepted the recommendations in full of the Legal Review.• A number of ESI recommendations are encompassed in other recommendations below.	Chapter 2 and Appendix A
1) The Committee recommends that HMLR appoints a member of staff within the organisation to review other similar cases, as the ESI legal review was a small sample of cases.	ii.iii, 2.16
2) The Committee recommends that HMLR offer meetings with the Chief Executive Officer and Chief Land Registrar and the Chair of the Customer Care Review Committee with those complainants whose cases were both in the scope of the 2024 review and continue to be in contact with HMLR.	ii.vi

EXTERNAL AUDIT ADVISER REVIEW

Recommendations	Reference in
Positive Introduction of Central Complaints Team (CCT)	
3) The Committee recommends HMLR undertake a review of the Central Complaints Team capacity and capability.	3.5
4) The Committee recommends HMLR review the Central Complaints Team Leader spans of control.	3.6
5) The Committee recommends HMLR undertake a consolatory and compensatory payment review.	3.7
6) The Committee recommends HMLR undertake a benefit analysis of specialisation of Lawyer Teams	3.8
7) The Committee recommends HMLR standardise the approach to customer contact within Lawyer Teams to provide a more consistent approach to complaint handling and help maintain complaint handling timescales within the SLA.	3.9
8) The Committee recommends HMLR provide access to complaints information for Account Managers.	3.10
The categorisation of complaints is sub-optimal	
9) The Committee recommends HMLR remove 'Classification Category' for complaints. This does not provide sufficient information on reasons for complaints.	3.12

10) The Committee recommends HMLR rationalise the complaint categories ('Zone Categories')	3.13
11) The Committee recommends HMLR enable selection of multiple complaint categories on a single complaint record.	3.14

Complaint handling procedures are not well documented	
12) The Committee recommends HMLR develop supporting guidance and Standard Operating procedures for Complaint Handling and on the use of categories.	3.16
13) The Committee recommends HMLR develop a more prescriptive structure for complaint responses.	3.17
14) The Committee recommends HMLR develop Standard Operating Procedures (SOPs) for the end-to-end complaint handling process.	3.18

Training is inconsistently delivered	
15) The Committee recommends mandatory complaint handling training should be delivered to all frontline teams on how to identify complaints, emphasising the Parliamentary and Health Service Ombudsman standards.	3.20
16) The Committee recommends HMLR provide training on Parliamentary and Health Service Ombudsman (PHSO) standards for all operational / service delivery teams.	3.21
17) The Committee recommends HMLR develop detailed complaint handling learning programmes for Customer Service Centre/Customer Complaints Team.	3.22
18) The Committee recommends HMLR develop the guidance and training on how to search Dynamics.	3.23

Quality frameworks could be strengthened	
19) The Committee recommends HMLR improve controls and Quality Assurance of complaint handling.	3.25
20) The Committee recommends HMLR review the Quality Assurance framework for customer-facing teams.	3.26
21) The Committee recommends HMLR introduce a Quality Assurance framework into Customer Complaints Team.	3.27

Data is stored in multiple systems	
22) The Committee recommends HMLR streamline communication entry points to HMLR	3.29
23) The Committee recommends HMLR improve communications to customers regarding available complaint channels.	3.30
24) The Committee recommends HMLR review the outbound correspondence system.	3.31

The use of Dynamics (complaint management system) is sub-optimal	
25) The Committee recommends HMLR introduce a referral count within Management Information as a control.	3.33
26) The Committee recommends HMLR review the Dynamics fields for effectiveness.	3.34
27) The Committee recommends HMLR review the linked case	3.35

search functionality in Dynamics.	
28) The Committee recommends HMLR deploy enhancements to Dynamics to better improve user functionality.	3.36
29) The Committee recommends HMLR undertake a cost benefit analysis of Dynamics licenses.	3.37
30) The Committee recommends HMLR undertake a user and process requirements review of Dynamics.	3.38

Limited Root Cause Analysis and Insight complaint Management Information ("MI")	
31) The Committee recommends HMLR Introduce a formal Root Cause Analysis (RCA) process for complaints.	3.40

Complaints workflow and prioritisation is misaligned to good industry practice	
32) The Committee recommends HMLR introduce a complaint triage process.	3.42
33) The Committee recommends HMLR sample review Enquiries to establish if any 'missed' complaints.	3.43
34) The Committee recommends HMLR introduce complaint update communications for customers.	3.44

HMLR Complaints Governance

Up to Date Customer Charter	
35) The Committee recommends that HMLR develop and publish a Customer Charter.	4.3 and Appendix A

Process, Policies and Standard Operating Procedures	
36) The Committee recommends that HMLR put a comprehensive set of policies in place to support the complaints procedure and training is given to staff by June 2025.	4.4
37) The Committee recommends that Complaint Policies should also be made available externally to customers on the HMLR gov.uk website to support the procedures in place.	4.5

Customer Contact Entry Points	
38) The Committee recommends that a new simplified customer complaints journey with minimal customer complaint entry points to HMLR (reduced from 52) to be in place by June 2025.	4.8

Central Repository for Complaints Correspondence	
39) The Committee recommends all complaints correspondence and information be centralised in one easy to access complaints management system.	4.9 and Appendix A

Customer and Employee Safeguarding Policy and Procedure	
40) The Committee recommends that HMLR updates its Customer Safeguarding policy and introduces an Employee Safeguarding policy for staff handling complaints.	ii.xii and Appendix A

41) The Committee recommends that HMLR updates its Customer Safeguarding policies and that the telephony system (IVR) is set up to identify customers with vulnerabilities or those who need more help through the use of modern identification software.	4.10 and Appendix A
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Disengagement Policy (now Contact Closure)	
42) The Committee recommends the Contact Closure policy should be discontinued; complaints should remain open until they are fully and satisfactorily closed.	4.12

Executive Team Review of Complaints	
43) The Committee recommends the Executive Team regularly review complaints and complaint trends against a set of Key Performance Indicators (KPIs).	4.13
44) The Committee recommends an external annual audit review of randomly selected complaint files alongside Independent Complaints Reviewer cases to be reviewed regularly by an executive committee, the Audit and Risk Committee and escalated to the Board as required.	ii.iv

Identification of Complaint Root Cause	
45) The Committee recommends root cause analysis of complaints is an area for automation in the future where complainants can self-identify the root cause of the complaint area from a drop down menu on the HMLR portal or an App.	ii.xi

Mediation Scheme	
46) Mediation Policy and procedure to be put in place.	6.12

Plain English Correspondence and Customer Guides	
47) The Committee recommends HMLR seeks re-evaluation of the Crystal Mark Plain English accreditation by September 2025.	ii.ix
48) The Committee recommends that all standard letters, templates, practice guides should be written in plain English.	4.18
49) The Committee recommends standard correspondence letters to customers are reformatted.	4.19

Parliamentary Ombudsman Complaint Principles	
50) The Committee recommends HMLR work to achieve a target of Firm Progress by the end of 2025 and set a target of a Mature rating across all areas of the PHSO maturity matrix by the end of 2027.	4.23
51) The Committee recommends that Parliamentary and Health Service Ombudsman complaints management principles should continue to be used as a framework. The results of regular annual assessments (both self and external) should be reviewed annually by the Audit and Risk Committee.	4.24

Culture

Culture	
52) The Committee recommends a cultural programme to support the organisations move towards a Business to Customer (B2C) service model.	5.3
53) The Committee recommends HMLR work closely with conveyancers to put systems and processes in place to provide accurate customer identity and property information first time to HMLR and significantly reduce the overall number of avoidable requisitions.	5.5

IT and Telephony Systems (IVR)

IT Systems	
54) The Committee recommends urgent investment in IT and IVR telephony systems as the single biggest enabler to improve complaint handling and customer management services more generally at HMLR.	ii.xvi
55) The Committee recommends HMLR establish a clear set of Key Performance Indicators (KPIs) for delivery of fit-for-purpose IT systems.	4.27
56) The Committee recommends that HMLR ensure staff have the required systems access.	4.30

IVR and Telephony System	
57) The Committee recommends that HMLR implement a modern Interactive Voice Response (IVR) system which allows the transfer of calls seamlessly across the department.	4.32

Organisation

Organisation Design	
58) The Committee recommends the formal delegation of authority for HMLR complaints management is allocated to the General Counsel Executive Team Member.	5.14
59) The Committee recommends an organisation review should be undertaken by June 2025 to assess whether any teams should be relocated inside a main Customer Service Directorate to foster greater collaboration and Service Delivery.	5.16

General Boundary Disputes

General Boundary Disputes	
60) The Committee recommends HMLR should seek to secure agreement from all interested parties including use of mediation where possible before non-rectification boundary alterations are made to the Register including situations where HMLR may have made a mistake.	ii.xviii, 6.12
61) The Committee recommends that where HMLR has made a mistake around boundaries, HMLR should consider covering costs, replicating the indemnity provision for rectification.	6.13
62) The committee recommends that an external communication and media programme is put in place to increase public awareness of	6.14

the “general boundary” provision, as it is so key to property ownership.	
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Independent Complaint Reviewer (“ICR”)

ICR Scope, Roles and Responsibilities	
63) The Committee recommends that ICR staff should be independent of HMLR.	7.7
64) The Committee recommends a formal consultation between MHCLG and HMLR takes place on the scope and responsibilities of the ICR and its authority. Clarity on the ICR’s roles and responsibilities, once confirmed, should be published on HMLR and ICR websites.	7.11

Immediate Next Steps

Customer Meetings	
<ul style="list-style-type: none"> HMLR to offer meetings to those individuals whose cases were in the scope of the 2024 historical cases review with HMLR CEO and Chief Land Register and the Chair of the Customer Care Committee. 	ii.vi

HMLR Response	
<ul style="list-style-type: none"> HMLR to provide a Response and Action plan based on the findings of the Committee to be published alongside this report. 	HMLR Response Plan

Governance

Customer and Change Committee	
<ul style="list-style-type: none"> It is recommended that the Customer and Change sub board committee monitors the delivery of the actions from the Customer Care Review. 	

