

APPENDIX B

HM Land Registry's Response to the Customer Care Review Report 2025

INTRODUCTION

HMLR accepts and endorses the findings and recommendations of the Committee

HMLR has a very responsible role. We support people and businesses as they move. We keep their property ownership accurate and secure in between times. We do this for many millions of people across the whole of England and Wales and most people will need our services at some point in their lives.

It is essential we serve every one of them with care, professionalism, clarity and empathy. Essential to that is an accessible and helpful complaints process that enables people to have the earliest and easiest resolution of any dissatisfaction they may have. It is also vital we use that process to learn how we can keep improving how we serve the public.

We provide people with trust and confidence in property ownership. We do this in part by ensuring that the register of ownership is legally and factually accurate. That is necessary, but it is not sufficient, as trust and confidence is also about how people feel.

We have not always done enough to ensure we are really understanding and meeting people's individual needs. We can do more to leave them feeling they have been understood; they understand our role, information and how we can help; and, that we have done everything we can to help them.

Customer Care as a Fundamental of Our Service and Our Culture

We must ensure all the people we serve understand our role, information and application processes, and what they mean for them. They need to know we understand their individual needs and have listened to what they want from us. And when they are not happy with how they have been served, we need to show we care - helping them to reach a resolution as soon as possible.

The review looked at complaints over a period of many years, during which we will have served tens of millions of customers. In that time there have been many examples of excellent customer service and complaints handling. Our colleagues care deeply about the public service they provide. What this review makes clear is that, as an organisation, we must make a step-change in the way we support and enable our colleagues to provide an excellent customer service to everyone all of the time.

The review provides an important set of findings and recommendations, which we accept and endorse in full and unequivocally. We are already in the process of implementing many of them. We are drawing up a detailed action plan to ensure they are all addressed, which will be overseen by the Board.

This will give us the organisational infrastructure and culture to be truly and consistently customer focused. It is key to our goal of being a first-class public service that meets people's diverse needs in the easiest and most accessible manner.

Andrea Cook OBE

Andrea Cook was the Independent Complaints Reviewer for land registration from 2019. Sadly, Andrea passed away in 2024. She was of great service to customers of HM Land Registry and played an important role in recommending improvements in the way we serve. We will remember the important contribution she made to our customer service throughout her period in office.

Simon Hayes

Chief Executive and Chief Land Registrar

RESPONSE TO THE COMMITTEE'S CONCLUSIONS

1. Introduction

- 1.1 It is important to acknowledge the Committee's conclusion that there was no evidence of systemic failing in complaints handling. However, we would stress our commitment to learning from and acting upon its findings, so that we can improve our customer care and complaints handling. It is fundamental to our role as a public service.
- 1.2 We have many actions underway and propose more. These are summarised in this response. We will create a detailed Action Plan that will be overseen by a committee of the HM Land Registry Board. As part of that, we will take forward the work of reviewing and auditing complaints on an ongoing basis and provide regular analysis of the full customer contact data.

2. Historical Complaint Cases

- 2.1 We agree that in some of the cases reviewed resolution often took a protracted period and that the customer impact and perspective was not fully considered. As recommended, we are offering to meet with those customers to listen to their experiences, discuss the Committee's findings and the actions we intend to take.

3. Governance

- 3.1 We will review all communications that people receive from us to ensure that it is accessible and helpful to them, whatever their prior knowledge or experience. We will ensure that checking for ease of understanding in how we communicate is a constant part of the way we work. We have engaged external expert advice on tone and clarity and will look at accreditation, such as the Crystal Mark for Plain English, to ensure we are holding ourselves to the best standard.
- 3.2 We have already introduced a central complaints team and handling process to ensure greater oversight of how complaints are handled, including registering the resolution that the complainant seeks at the outset. We will revise and reissue our complaints policies to ensure they meet best practice, including employee safeguarding.

4. Culture

- 4.1 Our Chief Executive and all our senior leaders will instil the importance of customer satisfaction through the values of empathy, responsiveness and public service. We will articulate and champion how excellent customer service alongside accuracy and expertise in land registration is essential to maintaining trust and confidence in property ownership and giving people the help they need from us.
- 4.2 Key to this is a clear focus on who we serve – the people of England and Wales. A lot of the time we interact with lawyers and other agents who represent individuals and business owners. People want and need this from us. But we must ensure that uppermost in our minds are the people those agents represent – the homeowners and businesses whose property ownership we secure. It is ultimately they who need simple, understandable information and help.
- 4.3 We believe that a truly customer-focused culture comes from leadership and clear and sustained action to empower our staff to understand and meet the needs of those we serve. We will pursue the Action Plan and continuously review what else we can do to target customer service improvements.

5. IT Systems Architecture and Telephony Services

- 5.1 Our colleagues' ability to serve our customers and handle complaints with empathy would be helped by improvements in our systems. We want our colleagues always to be able to communicate with our customers with full knowledge of who they are and what help they need from us. That will enable them to provide a more consistent and personalised service.
- 5.2 This requires us to further invest in some of the core foundations of our data and systems. Doing so is a key component of our strategy. We will prioritise those improvements that mean that communicating with us, whether by telephone or any other means, is easy and always cognisant of the customer's specific needs and case history.

6. General Boundaries

- 6.1 To avoid misunderstandings, we will do more to explain in easy terms how our plans help in identifying the true boundary without them being strictly definitive. This is particularly important to avoid situations the Committee have identified where people can wrongly believe that changes in the plan will resolve their concerns, when it may not.
- 6.2 We will identify the most effective means of mediating boundary disputes between neighbours to avoid the stress and cost of more formal dispute resolution.
- 6.3 We agree with the Committee that there is a particularly difficult situation where the boundary plan is not legally wrong, but it still might be amended to more clearly show where the boundary is. Both changing the plan and not changing the plan in this situation can give rise to misunderstandings, even though it would not alter the location of the boundary in law.
- 6.4 Since our objective is for people to have simple, clear and trusted information, we need to avoid these misunderstandings as much as we can. We will follow the Committee's recommendations and, in consultation with our customers, look to adopt a new process that leads to plan changes only when they help the owners in understanding the true location of the boundary.

7. Independent Complaints Reviewer (ICR)

- 7.1 The ICR provides a valuable means of resolving those complaints that cannot be resolved within HMLR. Of course, our aim is to do as much as we can to bring about a resolution that satisfies customers before that is necessary. But having a tailored route forward outside of HMLR is helpful where that has not proved possible.
- 7.2 We will work with the Ministry of Housing Communities and Local Government and the ICR to review the ICR's role. The principal objective will be to identify what changes in processes and powers might lead to greater confidence, transparency and customer-satisfaction in land ownership.

THE COMMITTEE'S FINDINGS AND RECOMMENDATIONS

8. Introduction

- 8.1 We accept and endorse the findings and recommendations of the Committee unequivocally and in full. Our priority is to continue and build upon the work that we have already begun to deliver the change our customers need.
- 8.2 For ease of reference, we have set out below our intended actions against the recommendations of the Committee as they are summarised in Chapter 8 of its report.

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
<p>ACTION: We will take forward the detailed recommendations of the legal review. We will arrange the meetings with the individuals as suggested. We will conduct the further review of sample cases, which we will do on an ongoing basis, sharing the findings and analysis of customer handling statistics with the HMLR Board Committee.</p>	

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

ACTION: We will take forward the recommendations with a view to building on the work we have already started through the centralisation of the complaints team, to bring greater focus, consistency, standards and skill in handling customer complaints. The specific actions can be found in the Action Plan.

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

ACTION: We undertook a project to deliver these changes which was completed in April. HMLR is continuing to improve complaints reports and management information to support root cause analysis and further improvements.

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

ACTION: We have designed a complaints framework to deliver these recommendations which is currently being tested within the Centralised Complaints Team.

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

ACTION: We will ensure that the training and professional support we provide our central teams is extended to all those who have interactions with customers in order to drive consistency and customer-focus in all that our customers experience with us.

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
ACTION: Quality assurance is the other key component that will drive consistency and focus on the needs of the individual in each interaction. We will build on the quality assurance already in place to create that holistic picture, as set out in the recommendations.	

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
ACTION: We have streamlined our complaints entry points and simplified our complaints webpages. We will ensure our systems enable us to produce helpful and simple communications in all forms.	

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 search functionality in Dynamics.	3.35
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
ACTION: We will continue to develop the use and usefulness of our customer relationship management software. We have gathered feedback from users as to the improvements they would like to see and have introduced enquiry tracking to pinpoint cases that are not proceeding at pace. Further improvements sought by users have been delivered in the last few months.	

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
ACTION: We can do more to learn from our complaints. We have created a dedicated role to provide the analysis that can identify the improvements we need to make. Improved customer data, enquiry tracking and a centralised approach to complaints handling will enable that analysis. Bringing this to the	

leadership through the Customer Forum within HMLR and to the governance boards will ensure it is prioritised in our management decisions.

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

ACTION: We will accelerate our work in centralising the handling and oversight of complaints and ensuring that everything that is a complaint is brought to the central team's attention as soon as possible.

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

ACTION: We will publish a new Customer Charter that fully reflects the customer service objectives identified in the Committee's report and our response.

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

ACTION: We will review and revise all our policies and training to ensure our staff are able to deliver on our complaints handling objectives. Revised external guidance and forms are in hand and will be published soon alongside a communications campaign.

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

ACTION: As part of the central complaints team control and oversight of the complaints process, we are simplifying the journey to ensure customer complaints are handled with speed, understanding and consistent high standards.

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

ACTION: As part of our improvements to our internal systems (see above), we will ensure our complaints correspondence is easily accessible.

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
ACTION: We will complete our current work to produce a new vulnerable customer policy and operating procedure. We are in the process of sourcing improved telephone access technology We will build on existing good practices with the Customer Support Centre and ensure all colleagues with customer contact are guided by a clear policy and operating procedure.	

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
ACTION: Speed of resolution is a new performance metric for the central complaints team, one of broader set of revised complaints handling indicators being monitored. We will end active contact closure and instead focus on resolution through expert handling.	

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
ACTION: We will take forward the work of reviewing and auditing complaints on an ongoing basis. We will target improvements in customer satisfaction and complaints handling. We will provide regular analysis of the full customer contact data for regular review by the Executive Team and audit and Board scrutiny. More details in paragraph 9 below.	

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
ACTION: We are developing a new online journey for complainants that provide this functionality.	

Mediation Scheme	
46) Mediation Policy and procedure to be put in place.	6.12
ACTION: We recognise the value and role mediation can play. We will look at the best means of offering mediation for boundary disputes and the value of that route in other circumstances.	

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
ACTION: To improve the clarity of communication, we have engaged expert advice to support on tone and voice in customer communications. We will complete the work to revise communications across all customer contact points. We will look at the ways in which AI can help guide and explain matters to our customers.	

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
ACTION: We value the assurance the PHSO framework gives us and agree with the Committee's targets.	

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
ACTION: We will support and empower our colleagues to make a difference in every interaction with customers and to challenge ways of working. We will instill the importance of customer satisfaction through the values of empathy, responsiveness and public service. We will articulate and champion how excellent customer service alongside accuracy and expertise in land registration is essential to maintaining trust and confidence in property ownership and giving people the help they need from us.	

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
ACTION: We agree that our colleagues' ability to serve our customers and handle complaints to a consistent high standard would be helped by improvements in our systems. We will prioritise those improvements that mean that communicating with us is easy and always aware of the customer's specific needs and case history.	

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
ACTION: A new telephony system will be procured.	

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
ACTION: Our resource plans for next year encompass our commitments in this response. We will revisit resource requirements once the Action Plan is finalised and during progress. We will continue to look at ways of working to ensure our focus on customer service and complaint resolution is being optimised.	

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 the "general boundary" provision, as it is so key to property	6.14

ownership.	
ACTION: We will do much more to explain in easy terms how our plans help in identifying the true boundary without them being strictly definitive. We will identify the most effective means of mediating boundary disputes between neighbours. We will consult on a new process that leads to non-essential plan changes only when they help the owners in understanding the true location of the boundary.	

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
ACTION: We will work with the Ministry of Housing Communities and Local Government and the ICR’s to review the ICR’s role. The principal objective would be to identify what changes in processes and powers might lead to greater confidence, transparency and customer-satisfaction in land ownership.	

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
ACTION: Meetings are being arranged.	

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. 	
ACTION: We will deliver and maintain an action plan and target and report on progress as set out in paragraph 9 below.	

9. Delivery and transparency of progress

- 9.1 We will create a corporate-level measure of success that targets improvements in customer satisfaction. The objective will be to drive improvement in how we understand and meet the needs of everyone we serve.
- 9.2 We will separately measure and target the particular planned improvements in customer complaints handling. We will use all useful feedback, such as complaints data and analysis, feedback from customers and the ICR and the UKCSI benchmark.
- 9.3 We will keep our action plan up-to-date and report progress. This will be overseen by the Chief Executive generally and in detail by senior leadership across the organisation.
- 9.4 Success measures and progress will be reported to the Land Registry Board and its sub-committees, as appropriate. We will conduct a review of overall progress in 12 months' time.