



I welcome the Independent Complaints Reviewer's Annual Report for 2021-22 and thank them for their work this year. I acknowledge the points raised in the report and note that we have already acted upon the majority of them. HM Land Registry accepted all the recommendations the ICR made for redress in 2021-22.

Our customers are at the heart of everything we do, with millions of people and businesses relying on HMLR every year for guaranteed information on property ownership and other elements affecting land use. HMLR plays a pivotal role in the conveyancing process, with our definitive record of land ownership essential to a functioning property market. Access to information about land enables individuals, businesses and the Government to make plans for the future, while meeting the many challenges of today including housing need, climate change and a thriving economy.

As covered in our own Annual Report and Accounts 2021-22, HMLR recorded 9,566 complaints in 2021-22 compared with 5,169 in 2020-21, an increase of 85%. This reflects a rise in the number of customer contacts and applications overall as a result of the increased activity in the housing market. Additionally, internal training and engagement around complaints, and further moves to centralise complaint resolution and customer contact, have resulted in greater consistency in the identification and recording of complaints, and some increase in numbers as a result.

As the ICR knows, I believe it is critically important that we continually look to improve our approach to complaints handling. We analyse all complaints to gain better insight into issues being raised and improve assurance that the complaints procedures are being followed.

I note the ICR's comment that although individual colleagues at HM Land Registry are effective in dealing with complaint resolution and service recovery, our complaint-handling processes and some of our software systems have not supported customer-facing staff appropriately. As a result of the incident raised in the ICR's report where a customer complaint was left unactioned for a long time, we have added new functionality to our complaints recording system that tracks the age of complaints. We have also taken steps to ensure timely legal resource is available for complaints. Moving forward, we plan for our Risk & Assurance function to provide ongoing assurance checks that complaints have been correctly identified, logged and handled.

As a result of other cases the ICR has raised, we have taken forward individual learning points where required and in some instances updated our guidance. This includes the comments made around HM Treasury payment parameters, where the incidents the ICR referred led to an internal review around understanding payments made as a result of complaints and clarifying the HMT guidance. We also assured the ICR that we fully accept the redress principle as set out by the Parliamentary and Health Service Ombudsman.

I appreciate customers' frustrations caused by HM Land Registry delays in processing some application types at the moment. As the ICR knows, our policy is to expedite applications where any hardship – whether financial, emotional or legal – is caused by registration delay. The vast majority of requests to expedite are processed within ten days. As a general rule, I don't think it is appropriate to compensate applicants who do not qualify for our expedite service. As colleagues here have discussed with the ICR, we publish average completion times for applications, which we hope helps to manage customer expectations around speed of delivery, and we communicate estimated completion dates as best we can. However, we do not have a formal, published service standard. Therefore, I do not feel that the time taken for an application to be processed, on its own, ought to lead to a compensatory payment.

In this context I would like to note, for the avoidance of doubt, that in the cases of Mr H and Mrs I referred to in the ICR's report, consolatory payments were agreed on the basis the complaints could have been better handled and not because of the delays themselves.

We have used the case where the ICR raised concern over the standard of our communication and use of in-house jargon to inform work that is ongoing to improve clarity, simplicity and tone with our customers. We have also considered the potential impact of our communications and the need for, and perception of, complete impartiality more broadly.

I appreciate greatly the independent and impartial opinions provided by the ICR when investigating complaints that reach their office. Our Independent Complaints Reviewer's Evaluation and Study Team reviews all reports, and acts on any failures and lessons to be learned. I am pleased by the ICR's comment regarding the generally good service that most of our customers might expect to receive and their reassurance around the willingness of HMLR to engage with the ICR's reports and recommendations and to take action to put matters right.

The ICR and their team continue to provide an invaluable service for both HM Land Registry and our customers, and I am very grateful.

Yours sincerely

Simon Hayes
Chief Executive and Chief Land Registrar