



Cabinet Office

# A Public Service Ombudsman

Government Response to Consultation

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# Introduction

On 25 March 2015 the Cabinet Office published the consultation paper 'A Public Service Ombudsman'. We asked users of services and other interested parties to reflect and comment on the proposals to restructure, reform, renew and reinvigorate public services ombudsmen made by Robert Gordon in his report to Government 'Better to serve the public'. In that report, Robert Gordon put forward the case for reform of the current public service ombudsmen sector and, in particular, recommended the creation of a new Public Service Ombudsman (PSO).

There is great merit in the Gordon recommendations which provide an excellent basis on which to develop these important reforms that will have long-lasting benefits. The consultation, which ran for 12 weeks, provided an opportunity to test this proposition and the principles underpinning it with a wide range of organisations and other interested parties.

We received 158 responses to the consultation from a broad range of organisations and individuals, including ombudsmen, charities, local authorities, housing associations, professional bodies, academics and individuals with direct experience of the current system.

The Government would like to thank all those who took the time to respond to the consultation. We have carefully considered all of these responses and this document sets out the main issues arising as well as the next steps.

A full list of respondents is at **Annex A**.

# Summary of Responses and Government Response

## Principles to underpin reform of ombudsman services

### **Question 1: Do you agree that these principles should underpin reform of the Ombudsman service?**

In the consultation the Government endorsed the principles for reform of ombudsman services put forward by Robert Gordon, namely better arrangements for citizens and for Parliament, and delivering better value for money. 119 responses were received to this question, 91 of which supported the principles suggested.

Respondents generally accepted the principle that reformed arrangements should be easily understood and accessible to members of the public. This included the need for users to be aware of the existence of an ombudsman service and to have the confidence that it could investigate thoroughly complaints made to it. It was also suggested that the principles should refer to customers rather than citizens.

Many respondents stressed the importance of the independence of the Ombudsman from interference by Government. There was also a call from some of those who had first-hand experience of using the system for the ombudsmen to have greater accountability and for there to be some form of scrutiny of the ombudsman's decisions on individual cases.

Most responses were supportive of better value for money being one of the principles of reform, however there was concern that this should not result in a detriment to the customer experience. Some respondents, in particular local authorities and housing associations, wanted further detail on how the new service would be funded and these concerns were echoed in their answers to Question 2.

Other principles suggested by respondents included:

- access to justice
- fairness
- transparency
- modernisation; and
- customer service

## **Government response**

We believe that the principles set out by Robert Gordon are a sound basis on which to approach reform of public service ombudsmen. As we develop the detail of the policy, we will test the design of the new service against the criteria for membership of the national and international ombudsman associations, including:

- independence
- fairness
- effectiveness
- transparency and openness; and
- accountability.

## A new single Public Service Ombudsman

### **Question 2: Would you welcome the creation of a single Public Service Ombudsman and are these the right services to be included?**

The Gordon review recommended that a new, single organisation would best deliver a public service ombudsman that would provide a comprehensive and seamless service. It was suggested that, in the first instance, the Public Service Ombudsman (PSO) would embrace the remit and responsibilities of the Parliamentary Ombudsman, the Health Service Ombudsman, the Local Government Ombudsman and the Housing Ombudsman.

135 responses were received to this question. 84 supported the proposals with 14 opposed to them.

For those in favour of the proposals, the principal reason for their support was that a single ombudsman service would be much simpler - both for those wishing to access the services and for those it investigates. There was however significant opposition from representatives of the housing sector to the inclusion of the Housing Ombudsman who questioned whether a scheme set up to investigate failures in public service should extend to the private provision of housing. They also pointed to the significant difference in the funding models of PHSO, LGO and the Housing Ombudsman.

There was general support for PSO's jurisdiction to be flexible and open to review in order to accommodate any future changes in public services. Some responses argued that reform should be an opportunity to address gaps in the coverage of ombudsman services, such as primary and secondary education. Many respondents wanted PSO's jurisdiction to extend to all those delivering public services, including private and voluntary providers, though there were concerns about how this would work in practice.

Another issue that arose was the need for reform to take account of UK devolution. PSO's legislative framework would need the flexibility to be able to adjust to further changes to the devolution settlement while at the same time respecting the current responsibilities of public service ombudsmen in the devolved administrations. It was argued by some that this would require the creation of two separate ombudsmen – one for public services delivered across the UK and one for those public services delivered in England only.

A small number of respondents argued that there should be a separate Health Service Ombudsman that addressed the specific challenges faced in that sector, perhaps accountable to the Secretary of State for Health. Arguments in favour of this included the need for specialist expertise to investigate health complaints and the sheer volume of complaints arising from this one area. Others raised concerns about a loss of expertise as a result of reform (see Question 4).

A couple of respondents wrote that a review of public services should not be made in isolation and that it should be accompanied by a review of the whole administrative justice system. Others, including some current users, said they were unclear how the creation of PSO would improve the level of service delivered to its customers.

## **Government response**

We want it to be as simple as possible for all UK citizens to pursue a complaint about public services. Complaints are increasingly related to services which cross organisational and jurisdictional boundaries, and the current fragmented nature of ombudsmen services can cause frustration and confusion. While there was broad support for the inclusion of PHSO and LGO's services in a new Public Service Ombudsman, a number of housing sector representatives raised concerns about the inclusion of the Housing Ombudsman. Having considered the points they raised carefully, we will therefore work to create a single service which will encompass the existing jurisdictions of PHSO and LGO only in the first instance with a framework that allows others to join over time.

By doing so the new PSO will cover UK reserved matters as well as those public services delivered solely in England. As such it will mirror the accountability of UK reserved matters to the Westminster Parliament, relinquishing jurisdiction over those if and when they transfer to the devolved administrations. At the same time, we will give PSO the ability to build stronger working relationships with its counterparts in the devolved administrations with a view to creating a 'no wrong door' approach to accessing ombudsmen services in the UK.

### **Question 3: If so, do you agree that these are the right founding principles for such an organisation?**

81 responses were received to this question. 65 respondents agreed that these were the right founding principles, with two stating that they disagreed.

Most responses to this question pointed to answers in other sections, particularly question 1. Those who answered more fully, pointed to the accountability of PSO and how this could be strengthened in any new legislation. Suggestions included the establishment of a Board to oversee the organisation's operations, oversight of its strategy and budget by Parliament, and the introduction of internal mechanisms to assure the quality of service.

#### **Government response**

We recognise the strength of feeling by those who want a new Public Service Ombudsman to be fully accountable to those it serves. We will seek to address this in two ways, both of which must recognise the need to protect the Ombudsman's independence when carrying out its functions.

Firstly we will create a modern governance structure for the organisation, including a statutory Chair and Board. The board will have corporate responsibility for the operation of the PSO and will also be responsible for ensuring the quality of the service it provides.

Secondly we believe that the Parliamentary nature of the Ombudsman and its work means that it should be more directly accountable to MPs. We will therefore seek views from Parliament on ways that it can provide stronger external scrutiny of the organisation. This includes the possibility of a statutory body comprised of Parliamentarians to oversee PSO's budget, strategy and performance.

**Question 4: Should a single Public Service Ombudsman organisation also retain specific sector-facing services and staff in for example in health or housing?**

117 responses were received to this question.

The majority (71) highlighted the need for any ombudsman to retain or have access to specialist expertise. They pointed to the need for PSO to demand the respect and authority of those it investigates, as well as the complexity of the subject matter of many complaints which are escalated to the final tier.

Other respondents did however raise concerns about retaining specific sector-facing services. They argued that this approach ran the risk of creating a culture of silo working which would limit the benefits of bringing the different organisations together. To provide a coherent and standardised approach to investigation some felt that all staff of PSO should be generalists, with the ability to call on experts where necessary.

The responses from the ombudsmen in the devolved administrations highlighted the need to retain flexibility in any arrangement of PSO's staffing. They emphasised that PSO should be able to deploy its resources in those areas which face the greatest pressures and to accommodate any addition or diminution to its jurisdiction over time.

**Government response**

We would expect PSO to employ those with a high level of expertise and experience so it can provide the best service possible and maintain public trust in its ability to deliver the right outcomes. However, it should also have the executive authority to organise and deploy its staff as it sees fit, not least to address the changing nature and volume of complaints it receives.

**Question 5: Should each sector within the organisation be led by a senior Ombudsman (or someone of equivalent status) eg a Housing, Local Government or Health Ombudsman?**

102 responses were received to this question. 65 respondents felt that each sector should be led by a senior ombudsman, while 26 were opposed to this approach.

Several reasons were given as to why a senior ombudsman in each sector would be beneficial. These included the respect and authority sector-specific ombudsmen would command amongst key stakeholders, the confidence both bodies in jurisdiction and members of the public would have in someone who displays expert knowledge and insight of a subject area, and the benefits of having recognisable and accessible figureheads for PSO within the different sectors.

Other respondents suggested a different approach. For example the Scottish Public Services Ombudsman detailed how they had trialled using deputy ombudsmen and specialised staff but had moved to a flatter management structure to improve their service. The Local Government Ombudsman had similarly moved away from operating with more than one ombudsman, while Ombudsman Services have senior leads with specific responsibilities. Other models were suggested as suitable examples for consideration including the Financial Ombudsman Service, the National Audit Office, and the Care Quality Commission.

There was some concern that by creating senior leads, PSO would be duplicating existing processes, limiting efficiencies that could be gained from the merger of the existing schemes, and increasing the risk of silo-working and fragmentation.

Some respondents felt that any decisions on organisational structure should be for PSO to make. This would allow for the organisation to be flexible to adapt to any changes in public service delivery models as well as changing demand for its services. Others made the case that skills and credibility were more important for senior leads than their status.

**Government response**

It is important for PSO to be seen as credible and authoritative by both those who use its service and those it investigates. We would expect, therefore, for there to be a high level of sector-specific knowledge and investigatory expertise within the organisation. However we also wish to create a service that is coherent in its approach across public services and which adapts easily to changes in the nature and volume of the complaints it investigates. As such, we do not see the necessity to legislate for a cadre of lead ombudsman but will instead seek to vest in PSO powers to delegate responsibility to staff as it feels appropriate.

## **Question 6: Is ‘Public Service Ombudsman’ the appropriate title for a new organisation?**

101 responses were received to this question. 40 respondents supported the suggested title and 23 were opposed it.

The main issue raised, particularly in responses from the housing sector, was that not all services of PSO’s proposed jurisdiction are “public”. For example, 83% of the Housing Ombudsman’s members are private organisations, thus referring to the ombudsman as “public” could be misleading or create confusion. Similarly, not all public services would be included within PSO’s proposed jurisdiction.

Other responses argued that the proposed title could create confusion with other bodies. In particular, any title would need to take account of the existence of the public service ombudsmen in the devolved administrations. There was also concern that the emphasis in the title was wrong since it implied a personal jurisdiction rather than a service.

Some respondents argued that the statutory name and working title of the organisation did not need to be the same, and that the organisation itself could decide on how it branded itself. This is already the case with the Local Government Ombudsman (the Commission for Local Administration in England) and Parliamentary and Health Service Ombudsman (the Parliamentary Commissioner for Administration and the Health Service Commission for England).

Several responses highlighted that the name should be clear to users and user testing was recommended. Some noted that term “ombudsman” is not well known and others suggested that the word “complaints” should be prominent in the new title.

### **Government response**

Formally the organisation will have a title set out in legislation. However we want it to be easily recognisable so that those who need to use its services can find it easily. It will therefore be for the organisation’s Board to decide how to brand its service in the interests of clarity and accessibility. There will be an expectation that in doing so the Board will take into account the views of the public service ombudsmen in Scotland, Wales and Northern Ireland, as well as representatives of the sectors over which it has jurisdiction.

## A service accessible to all

### **Question 7: Do you agree that there should be the widest possible routes of entry to a Public Service Ombudsman?**

109 responses were received to this question. Of those 105 agreed that there should be the widest possible routes of entry.

A ‘no wrong door’ approach was widely supported by respondents as it could greatly simplify the customer experience. This would mean that those wishing to refer a complaint would not have to struggle to find out which ombudsman to turn to or approach multiple ombudsmen if their complaint spans several different services. Some responses pointed to examples where this approach already worked well, such as Complaints Wales, Revolver and DWP’s ‘Tell Us Once’ service. There were concerns though that such an approach could be difficult to manage in practice because of the complexity of the complaints system and the many different organisations involved in the process.

Alongside this there was support for providers to be under a statutory duty to signpost to PSO. Some felt that PSO itself should provide this service where there existed other possible routes for redress.

A significant number of respondents supported the principle of direct access to the ombudsman without needing to go through a Member of Parliament for complaints about government departments or a “democratic filter” for complaints about housing. Some respondents felt that these acted as unnecessary barriers to complaining and that their removal would make individuals more likely to use the service.

Individuals’ accounts of referring a complaint to PHSO through a Member of Parliament, the so-called “MP Filter”, were mixed. Some welcomed the role their MP had played in driving their own complaint forward, while others found the necessity to for an MP referral to be an additional hurdle. At the same time, many responses supported the principle that Members should be able to play a role if the complainant wished. Some saw the involvement of Members as a way in which the ombudsman could be held to account for its service.

### **Government response**

Our priority is for complaints to be resolved quickly and effectively at a local level. It is important that those delivering public services are given the opportunity to put things right and to embrace the learning from any mistakes. However, once the complaints procedure has been exhausted, we propose that there will be a statutory duty on the organisation to signpost to PSO, who will continue to act as the final tier of redress.

PSO should operate a ‘no wrong door’ approach, referring individuals and possibly transferring their complaints where they fall wholly or partly within the jurisdiction of another complaints resolution body (e.g. the ombudsmen for the devolved administrations, the Information Commissioner).

We are minded to legislate for dual track access, whereby an individual would be able to approach PSO directly or with the assistance of a representative. However we must take into account the views of MPs themselves on this issue and remain open to further discussions following the publication of draft legislation.

We also recognise concerns that changes to the current process could adjust the relationship between Parliament and its Ombudsman. We will therefore work closely with Parliament to make sure that the draft legislation preserves and strengthens this relationship including through the introduction of greater parliamentary oversight of the operations of PSO, the retention of Parliament's ability to examine PSO's reports, and by reinforcing PSO's status as a body accountable to the legislature.

## **Question 8: In what ways could it be made easier for citizens to access resolution and redress?**

119 responses offered comments on this question.

There was general support for allowing PSO to receive complaints in a variety of ways. As well as the methods suggested in the consultation - email, telephone and online - respondents also wanted to allow complaints to be made through social media, text messages and apps.

Some respondents highlighted that it can be difficult to effectively capture complaints that are received orally rather than in writing, and that this can be time-consuming. Several respondents highlighted that PSO should take into account the needs of vulnerable users. Others suggested that the legislation governing the format in which complaints can be made to PSO would need to be flexible given the likely changes in technology.

A number of respondents felt that PSO should play a much more active role in the resolution of complaints at a local level. They mainly focused on a perceived deficit in the advocacy services available to those wishing to make a complaint, suggesting that this was a gap that PSO could plug.

Many respondents argued that there needed to be much greater clarity about complaints processes across the system. Amongst the suggestions were:

- clear timescales for resolving complaints at each tier;
- the introduction of comprehensive complaint handling standards;
- progress reports; and
- transparency in decision-making.

There were also suggestions for how PSO could be more accessible, open and transparent, including issuing guidance on recommendations for compensation levels and providing a legal definition of maladministration.

### **Government response**

Our intention is to build a modern ombudsman service that engages fully with its customers, is accessible, and is responsive to a range of needs. We will therefore enable PSO to accept complaints through a variety of channels and seek to ensure that the legislation is flexible enough to allow for technological developments over time.

PSO is one of many actors in the complaints system and it will need to work with others to help minimise any barriers to complaining, including to its own service. Whilst we would expect it to have a strong relationship with those providing advocacy services, we are not persuaded that it should be PSO's role to make good any perceived deficit in such services.

## An enhanced role

### **Question 9: Would you support a wider role for PSO as a champion of effective complaints across the public sector?**

Robert Gordon proposed that PSO play a wider and enhanced role in dispute resolution, becoming the champion of best practice and taking a lead in changing the culture of complaint handling within the public sector.

109 responses were received to this question. 86 were in favour of a wider role for the new ombudsman, with six opposed.

There was general support for PSO's role being extended. Respondents recognised that PSO would be well placed to capture and disseminate complaints data, and to share this with others such as Parliament and regulators to improve the learning from complaints.

Some responses pointed to the success of the Scottish Complaints Standards Authority in leading the development and implementation of simplified, standardised complaints handling procedures across the public sector. Other providers cited the support they had received from the Housing Ombudsman on best practice in complaints handling. Suggested roles for PSO included providing a kite-marking function; setting complaints standards; providing benchmarking; and delivering training for complaint handlers.

There was some concern however that by extending PSO's role there would be less focus on its role of providing redress for individual citizens. Some respondents thought that there were others better equipped to set standards, pointing to the preponderance of regulators in what was believed to be an 'already-crowded field'. Others felt that an extended role for PSO could result in unnecessary bureaucracy for service providers or that it would make those delivering public services less likely to take responsibility for their own local complaints systems.

### **Government response**

We want PSO to use its expertise and insight to monitor and champion improvements in complaints handling. It will be given express powers to publish guidance, reports and training materials promoting best practice in complaints handling including principles, processes and analysis. This supports the creation of a 'complaints culture' in which the learning from complaints is disseminated widely and built upon while allowing those delivering public services to remain in control of, and accountable for, the design of their own complaints systems.

## **Question 10: What range of investigative tools do you think the PSO might need?**

95 responses were received to this question.

A number of respondents felt that PSO should be able to undertake investigations on its own initiative, without first receiving a complaint from an individual. It was argued that this is standard for most ombudsmen outside the UK, and had proved useful in bringing systemic improvements in public services. Examples were given of how an own initiative power could be an important tool in holding public services to account, particularly when vulnerable individuals are unable or reluctant to complain, and could prevent large scale failures.

Other responses suggested that any own initiative powers would need to be properly constrained. For example, any use of own initiative powers could be subject to Parliamentary oversight, or the ombudsman could be required to consult before commencing any such investigation. Alternatively own initiative powers could be limited to the ability to extend ongoing investigations where systemic failure is suspected or where concerns have been raised by specific organisations with significant contact with public service users.

On the other hand some responses opposed to any extension of the ombudsman's powers to initiative an investigation arguing that the current powers are sufficient. There was concern that any new powers could duplicate those of other bodies, including regulators, creating further confusion in an already complex landscape.

The ability for organisations to self-refer to PSO was supported by some, although there were arguments that allowing this may undermine the resolution of complaints at a local level. It was also pointed out that some bodies were already obliged to notify existing regulators of breaches of standards.

There were also calls for PSO to be given appropriate powers to be able to work effectively with others, including regulators, for example by sharing information and intelligence or conducting joint investigations. A number of responses highlighted the need for the ombudsman to be able to require the information it needs to conduct an investigation.

Some respondents felt that PSO would need powers to enforce compliance with recommendations. Various methods were suggested for this including a statutory duty on those in jurisdiction to accept recommendations, the ability to report to Parliament, and the power to seek judicial enforcement of recommendations

Some respondents felt that PSO should have the freedom to publish reports on their investigations. This would help to improve accountability in organisations and enable lessons to be learned more widely, as well as allowing systemic and emerging problems to be highlighted and addressed together. Such reports could include statistical data and policy recommendations for Government.

Responses also raised a number of means for improving the service offered to citizens without a change in powers. For example, it was felt by some that skilled staff who had a deep understanding of the areas in which they work was the ombudsman's most important

tool. Other responses suggested that PSO should have the flexibility to resolve disputes informally and to be able to offer mediation services.

### **Government response**

We want to provide PSO with the necessary tools to carry out its work effectively and efficiently. We will therefore propose giving PSO the following powers:

- to conduct joint investigations with others where the subject matter of the complaint falls within multiple jurisdictions, e.g. with the national ombudsmen in Scotland, Wales and Northern Ireland;
- to widen the scope of an individual investigation, where it appears that injustice may have been suffered as a result of similar maladministration elsewhere;
- to share its reports with prescribed others, such as regulators and inspectors, with a view to making sure that its findings and recommendations feed into the appropriate oversight mechanisms; and
- wider powers to publish the outcomes of its investigations and on any general themes arising.

We propose to maintain and strengthen the relationship between Parliament and the ombudsman. PSO will continue to report to Parliament on its investigations, including where it appears that the injustice caused to an individual(s) has not been remedied. We will not make the findings of PSO binding.

Whilst we understand the attraction of 'own initiative' investigations, there is a risk that the introduction of such powers could detract from PSO's role in putting things right for the individual citizen. Consequently we do not propose to create these powers for the PSO.

## Next Steps

We are grateful for the range of responses we have received to this consultation which has helped us refine our proposals for a Public Service Ombudsman.

We will now continue to develop the detail and will work with interested parties to clarify further the role, structure, governance, and accountability of the new service. Following this, we intend to publish draft legislation that sets out the detail of the proposals for further consideration before the end of the current Parliamentary session.

## Annex A – List of respondents to the consultation

We received 158 responses to the consultation. In addition to the organisations listed below, we also received responses from 30 individuals.

### Responses from organisations

Action against Medical Accidents (AvMA)  
Adjudicator's Office  
Administrative Justice Forum  
Affinity Sutton Housing  
Age UK  
Aldwyck Housing Group  
Amicus Horizon Housing  
Anchor Sheltered Housing - not for profit  
Anthony Collins Solicitors LLP  
Ashfield Homes  
Barnet Group - Homes  
Basildon Council  
Basildon Council - Housing Services  
Bedford Borough Council  
Bolsover District Council  
Brighton and Hove Impetus  
British Geriatrics Society  
Bromford - Housing  
Broxbourne Borough Council  
Building and Engineering Services Association  
Care England  
Care Quality Commission  
CCH (Confederation of Co-operative Housing)  
Chartered Institute of Arbitrators (CI Arb)  
Chartered Institute of Housing  
Chartered Trading Standards Institute  
Cheltenham Borough Homes Limited  
Citizen's Advice  
Civil Enforcement Association (CIVEA)  
Cornwall Council  
Ealing Council  
East Thames Group - Housing Association  
G15 Southern Housing Group Ltd  
Gentoo Group  
Gravesham Borough Council  
Hastoe Housing Association  
Healthwatch England  
Homes and Communities Agency  
HouseMark  
Independent Age  
Independent Complaints Review for the Land Registry  
Institute of Customer Service  
ISOS Housing  
JUSTICE

Keep Me Posted  
Kent County Council  
Local Government Association  
Local Government Ombudsman  
London Borough of Camden  
London Borough of Enfield  
London Borough of Hackney  
London Borough of Islington  
London Borough of Southwark  
London Borough of Sutton  
London Travel Watch  
Manchester City Council  
Marston's Holdings - Judicial Services  
MDDUS  
Medical Defence Union  
Medical Protection Society  
Midland Heart - Housing  
Mole Valley District Council  
Monitor - sector regulator for health services in England  
National Audit Office  
National Housing Federation  
New Charter Group  
Newark and Sherwood Homes Ltd  
Newcastle City Council  
Northern Ireland Ombudsman's Office  
Nottingham City Council  
Nottingham City Homes  
Office of the Independent Adjudicator for Higher Education  
Ombudsman Association  
Ombudsman Services  
One Housing Group  
Parkinson's UK  
Parliamentary and Health Service Ombudsman  
Peabody charity  
PHSO The Facts  
POhWER - Advocacy Provider  
Poole Housing Partnership  
Professional Standards Authority for Health and Social Care  
Property Ombudsman  
Public Sector Complaints Network  
Public Services Ombudsman for Wales  
Pupils 2 Parliament  
Radian Housing Association  
Richard Housing Partnership  
Royal Borough of Greenwich Housing Services  
Royal College of Nursing  
Sanctuary Group Housing  
Scottish Public Services Ombudsman  
Sheffield City Council  
South West Whistleblowers Health Action Group

Southampton City Council  
Southern Housing  
Sovereign Housing Association  
Specialist Engineering Contractor's Group  
Spectrum Housing Group  
St Mungo's Broadway  
StepChange Debt Charity  
Stockport Council and Stockport Homes  
Strengths Partnership Ltd  
Surrey County Council (Adult Social Care)  
Tadworth and Walton Residents Association  
Transport for London  
The Housing Ombudsman  
The National Complaints Manager Group  
The Patient's Association  
TPAS - Tenant Involvement Organisation  
Victim's Commissioner for England and Wales  
Viridian - Housing  
Virtual College Limited (Supplier to the Housing Ombudsman Service)  
Walsall Metropolitan Borough Council  
Walterton and Elgin Community Homes  
Watford Community Housing Trust  
WDH  
Welsh Language Commissioner  
Welwyn Hatfield Community Housing Trust  
Which?  
Wigan and Leigh Homes  
Wirral Methodist Housing Association  
Wolverhampton Homes  
Women's Pioneer Housing  
Worcester City Council  
Wycombe District Council  
Your Homes Newcastle