

# Our complaints self-assessment (March 2024)

## Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i></p>	Yes	<p>Our complaints policy and procedure contain the definition of a complaint as <i>'an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of residents'</i>.</p>	
1.3	<p>A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint.</p> <p>A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	Yes	<p>Our customers do not need to use the word 'complaint' for it to be treated as such.</p> <p>As per Section 2 of our policy we say that whenever a customer expresses dissatisfaction we will give them the choice of making a complaint.</p> <p>We will also accept a complaint made on a customer's behalf through an</p>	

			advocate, for example, from a friend, support worker, relative or MP. Where complaints are made through an advocate we will, where appropriate, need to confirm this with the customer.	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	Section 2 of our policy contains the following definition: "A service request is defined as a request from a customer that requires action to be taken to put something right. It will usually be the first time we have been contacted about an issue and have not previously had the opportunity to investigate the concerns and agree what action we will take to resolve the issue." We record service requests.	Meets the basic principle but this does require further action.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Section 2 of our policy states that if a customer who makes a service request also lets us know that they are dissatisfied at any time with our response or actions being taken, we will raise the concerns as a complaint and continue to work to resolve the issue being reported.	

1.6	<p>An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>	Yes	<p>All survey feedback is monitored by the Research and Insight team. Any comments made by a customer that require further review are passed to the appropriate team for investigation. In contacting the customer, appropriate advice and signposting will be provided. Section 9 of our policy states that: We will also signpost customers to our complaints service during any wider surveys about LiveWest's performance.</p>	
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## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Section 2 of our policy states that we will accept a complaint, unless there is a valid reason not to do so. Where we are unable to consider either an overall complaint, or any points being raised within it, we will explain why and offer advice or support to customers to try and help them resolve the issue. We also say that when reviewing any exclusions from our policy we will assess each complaint on a case by case basis	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include: <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• Legal proceedings have started. This is defined as details of the claim, such as</li> </ul>	Yes	Section 2 of our complaints policy contains a list of matters excluded from our complaints service.	

	<p>the Claim Form and Particulars of Claim, having been filed at court.</p> <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>			
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>Section 2 of our policy excludes complaints about issues where more than 12 months has passed, unless they form part of an ongoing issue. We may apply discretion in considering whether to exclude or progress a complaint about issues older than 12 months.</p>	
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>	Yes	<p>Section 2 of our policy states that where we are unable to consider either an overall complaint, or any points being raised within it, we will explain why and offer advice or support to customers to try and help them resolve the issue.</p> <p>We will also let our customers know that they can immediately refer any decisions about exclusions to the Housing Ombudsman Service and</p>	

			provide them with the Service's contact details.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.		Section 2 states that when reviewing any exclusions from our policy we will assess each complaint on a case by case basis	

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Section 3 of policy states that we are happy to accept all types of feedback (including complaints, compliments, and comments) verbally, in writing and via our social media platforms. We will tell customers how to raise concerns with us, publicising, and explaining our complaints policy and process.</p> <p>We also recognise that sometimes when making complaints customers will let us know that they are vulnerable, or that the concerns they are reporting are making them feel vulnerable. We will make sure that any requests for reasonable adjustments made during the complaints process are taken into account and appropriate action taken.</p>	

			<p>Section 6 of our policy recognises that some customers may find it difficult to engage with the complaints process and explain their concerns. We will offer advice and support to customers to ensure that the complaints process is fully accessible to customers. We will consider all requests for reasonable adjustments under the Equality Act 2010 and will implement adjustments where it is practicable to do so. We will share information in a way that meets the customers' individual needs.</p>	
3.2	<p>Residents must be able to raise their complaints in any way and with any member of staff.</p> <p>All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>	Yes	<p>Section 3 of our policy states that our customers will be able make a complaint in any way and with any member of staff. Our staff are aware of our complaints process and are able to pass details of the complaint to the Service Improvement Team.</p> <p>Section 10 of our complaints policy states that our colleagues will be</p>	



			trained on our approach to managing complaints ensuring that we achieve a consistent, high quality, transparent, customer-focused response across LiveWest.	
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	Section 1 of our policy says that we welcome complaints, as well as compliments and comments, as an opportunity to listen to what our customers say is important to them, and to improve our services.	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	Section 12 of our complaints policy states that the policy will be published on our website, together with details of the Housing Ombudsman Service and complaint handling code. We will also include signposting within our complaint acknowledgment letters.  A link to the policy is also contained in the complaint acknowledgement letter. For customers who are unable to access digital channels, a printed version of the complaints policy will be provided. Our policy sets out the	

			details of each stage of our process and timescales.	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Section 12 of our policy states that the policy will be published on our website, together with details of the Housing Ombudsman Service and complaint handling code. We also include signposting within our complaint acknowledgment letters.	
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Section 3 of our complaints policy states that we will also accept a complaint made on a customer's behalf through an advocate, for example, from a friend, support worker, relative or MP. Where complaints are made through an advocate we will, where appropriate, need to confirm this with the customer and make a record of this agreement. Our customers are able to be represented or accompanied by an advocate in any meetings regarding their complaint	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the	Yes	Signposting to the Housing Ombudsman is contained in complaint acknowledgement and	

	individual can engage with the Ombudsman about their complaint.		closure template letters. This provides contact information to the customer of how they can contact the Ombudsman Service at any time during their complaint. Details of how to contact the Housing Ombudsman is also detailed on our website.	
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#### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<p>We say:</p> <p>Service Improvement team – We have a dedicated team of 6 Service Improvement Advocates and 3 Senior Service Improvement Advocates who manage complaints at LiveWest with a Customer Experience Complaints Manager.</p> <p>AfterCare team – We have a dedicated team who manage defects and development linked complaints.</p>	

			All LiveWest colleagues are aware of these teams and their roles and responsibilities.	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	<p>Section 11 of our policy states our complaints handlers will have access to staff at all levels to facilitate the prompt resolution of complaints. They have the authority and autonomy to act to resolve disputes promptly and fairly, which may include:</p> <ul style="list-style-type: none"> <li>• Calling a complaints case conference.</li> <li>• Escalating issues for ownership.</li> <li>• Challenging statements or findings.</li> </ul> <p>The Service Improvement team hold regular individual department reviews of open complaints with supervisors, team leaders, managers and heads of service to resolve complaints quickly and effectively.</p>	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant	Yes	Section 9 of our policy states that we will use complaints, compliments, and feedback as	

	<p>staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively</p>		<p>opportunities to learn and improve our services. We will identify the causes of service failure and use this insight to address the underlying issues and improve services. We will use the compliments and positive feedback we receive from customers to help us understand what is important and inform future service design.</p> <p>Section 10 of our policy states that our colleagues will be trained on our approach to managing complaints ensuring that we achieve a consistent, high quality, transparent, customer-focussed response across the organisation.</p> <p>We recognise that complaints form an integral part of our business service delivery</p>	
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## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<p>Section 2 of our policy states that the policy applies to all LiveWest customers including anyone who has applied to use, or is already using, our services This policy also applies to members of the public if they have been affected by a decision that we have made or something that we have done or not done.</p> <p>Section 10 of our policy states that we recognise that complaints form an integral part of our business service delivery.</p>	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Section 5 of our policy states that In accordance with the requirements set by the Housing Ombudsman Complaint Handling Code LiveWest operates a two stage complaints process. Our focus is on timely and local resolution.	

5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<p>Section 5 of our policy states that In accordance with the requirements set by the Housing Ombudsman Complaint Handling Code LiveWest operates a two stage complaints process.</p> <p>We also provide timely and consistent reminders to customers about when they can refer complaints to the HOS</p>	
5.4	Where a landlord’s complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	All complaints are handled within LiveWest	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	All complaints are handled within LiveWest	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the	Yes	<p>Section 5 of our complaints policy states that at both stages of our complaints process we will:</p> <ul style="list-style-type: none"> <li>• Provide the customer with an opportunity to set out</li> </ul>	

	complaint is unclear, the resident must be asked for clarification.		<p>their concerns and outcomes being sought.</p> <ul style="list-style-type: none"> <li>• Confirm our understanding of the customer’s complaint.</li> <li>• Consider all relevant information and evidence in investigating the customer’s concerns.</li> <li>• Consider remedies at any point within the complaints process to resolve the complaint as early as possible.</li> <li>• Provide a complaint response to the customer when the answer to the complaint is known not when the outstanding actions required to address the issue are completed.</li> </ul>	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Section 2 of our complaints policy states that where we are unable to consider either an overall complaint, or any points being raised within it, we will explain why and offer advice	



			or support to customers to try and help them resolve the issue.	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> <li>a) deal with complaints on their merits, act independently, and have an open mind;</li> <li>b) give the resident a fair chance to set out their position;</li> <li>c) take measures to address any actual or perceived conflict of interest; and</li> <li>d) consider all relevant information and evidence carefully.</li> </ul>	Yes	<p>Section 5 of our policy states that our both stages of our complaints process we will:</p> <ul style="list-style-type: none"> <li>• Provide the customer with an opportunity to set out their concerns.</li> <li>• Confirm our understanding of the customer’s complaint.</li> <li>• Consider all relevant information and evidence in investigating the customer’s concerns.</li> <li>• Consider remedies at any point within the complaints process to resolve the complaint as early as possible.</li> <li>• Provide a complaint response to the customer when the answer to the complaint is known not when the outstanding actions required to address the issue are completed.</li> </ul> <p>Within our procedure we require</p>	

			that complaint leads conduct impartial, thorough investigations, to work directly with customers to reach agreed outcomes, to monitor the delivery of agreed outcomes, and to involve appropriate support from other service areas if needed.	
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<p>Section 5 of our policy states that:</p> <p><i>For stage 1 complaints:</i> We recognise that some complaints may require detailed investigations; where this is the case, we will inform the customer about the timescale in which we will respond. This will usually be no more than 20 working days from receipt of complaint. If an extension beyond 20 working days is required by us, we will agree this with the customer.</p> <p><i>For stage 2 complaints:</i> The timescales to respond to a complaint at stage 2 will normally be no more than 7 working days</p>	

			from the date of stage 2 formal acknowledgement. If the response timeframe will take longer than 7 working days we will inform the customer, and in the event that the timescale will take longer than 20 working days we will agree this in advance with the customer and provide a full explanation.	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	Section 6 of our complaints policy states that we recognise that some customers may find it difficult to engage with the complaints process and explain their concerns. We will offer advice and support to customers to ensure that the complaints process is fully accessible to customers. We will consider all requests for reasonable adjustments under the Equality Act 2010 and will implement adjustments where it is practicable to do so. We will share information in a way that meets the customers' individual needs.	Meets the basic principle but this does require further action.

5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<p>Section 2 of our policy states that we will accept a complaint, unless there is a valid reason not to do so. Where we are unable to consider either an overall complaint, or any points being raised within it, we will explain why and offer advice or support to customers to try and help them resolve the issue. We also say that when reviewing any exclusions from our policy we will assess each complaint on a case by case basis.</p>	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	<p>Our Service Improvement team utilise a shared Outlook mailbox for customers to send in evidence, communications, and updates on complaints. All advocates have access to the shared mailbox.</p> <p>All emails, telephone conversations, and complaint correspondence, including the incoming complaint and outcomes, are held together in our housing system and the LiveWest document record centre. This enables us to have</p>	

			<p>access to the details on the system for customers queries and updates and to evidence complaint handling.</p> <p>Third party contact and any reports or surveys will be referenced within the complaint record and available from the relevant technical area.</p>	
5.13	<p>Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.</p>	Yes	<p>Section 5 of our complaints policy states that at both stages of our complaints process we will consider remedies at any point within the complaints process to resolve the complaint as early as possible.</p>	
5.14	<p>Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.</p>		<p>Section 7 of our policy states that where a customer’s behaviour in accessing or using the complaints process becomes unreasonable, such as refusing to accept the outcome of their complaint or to allow actions to be taken, or using our complaints service to make excessively unreasonable demands, our internal guidance for managing unacceptable behaviour will apply.</p>	

			Our Unacceptable Behaviour Policy requires that any assessment will demonstrate regard for the provisions of the Equality Act 2010 and includes review arrangements for any restrictions put in place.	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<p>An Equality Act assessment is carried out each time we place any restrictions on a customer's contact with us due to unacceptable behaviour.</p> <p>Our Unacceptable Behaviour Policy requires that any assessment will demonstrate regard for the provisions of the Equality Act 2010 and includes review arrangements for any restrictions put in place.</p>	

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<p>Within the Service Improvement Team and at the customer's initial point of contact we undertake appropriate triaging within a common goal of resolving all complaints effectively and promptly.</p> <p>Section 5 of our policy states that our focus is on timely and local resolution.</p>	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	As per our complaints policy (section 5), we will acknowledge all complaints within 24 hours of receipt. The Service Improvement team monitor all received complaints irrespective of channel and ensure that all complaints are logged and assigned to a complaint lead within 24 hours of receipt.	

6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	As per section 5 of our complaints policy, the complaint lead will work with the relevant manager or team leader to resolve the complaint and formally respond to the customer within 10 working days.	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Section 5 of our complaints policy states that we recognise that some complaints may require detailed investigations; where this is the case, we will inform the customer about the timescale in which we will respond. This will usually be no more than 20 working days from receipt of complaint. If an extension beyond 20 working days is required by us, we will agree this with the customer.	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	The Housing Ombudsman contact details are provided at each stage of the complaint and when extending a complaint response	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address	Yes	Section 5 of our policy includes the requirement that at both stages of our complaints process we will provide a complaint response to the	



	<p>the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.</p>		<p>customer when the answer to the complaint is known not when the outstanding actions required to address the issue are completed.</p> <p>Within our complaints procedure (Section 5.2) we also say that where we do need to manage customer feedback within our complaints service, we will make sure that all new complaints are responded to within our required timeframes when the answer to the complaint is known, not when all actions required to address the issue are completed regardless of timeframe.</p> <p>Actions outstanding from the complaint are tracked and delivered, with regular updates being provided to our customers</p>	
6.7	<p>Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.</p>	Yes	<p>Section 5 of our policy states that when we receive a complaint we will investigate fully and ensure we address all relevant aspects.</p> <p>In addition, our complaint template outcome letters clearly require all</p>	

			complaint leads to address every point of the complaint scope.	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Within our complaints procedure (Section 5.2) we say that any additional concerns raised during a complaint investigation will be incorporated into the Stage 1 response if they are relevant to the complaint and the Stage 1 response has not been issued. In situations where a Stage 1 response has already been issued and responding to the additional concerns would unreasonably delay the response, we may agree to raise a new complaint	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a) the complaint stage;</li> <li>b) the complaint definition;</li> <li>c) the decision on the complaint;</li> <li>d) the reasons for any decisions made;</li> <li>e) the details of any remedy offered to put things right;</li> <li>f) details of any outstanding actions; and</li> </ul>	Yes	The complaint outcome template letters cover all the points as detailed by the Complaint Handling Code.	

	g) details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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### Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Section 5 of our complaints policy states that a customer who is not happy with our response can request a review of their complaint. Within 10 working days of receiving the stage 1 outcome letter, the customer is required to notify us of their intent to progress the complaint to stage 2 for a senior manager review.	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Section 5 of our policy states that when we receive a request for a complaint to progress to stage 2 we will formally acknowledge, define and escalate the complaint within five working days of the request being received.	
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to	Yes	Section 5 of our policy states that we do not require customers to let us know the reasons for their	

	make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		escalation request, but we will let them know that this can be helpful information for the stage 2 complaint investigation process.	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Section 5 of our policy states that the complaint will be assigned to a senior manager who will confirm their understanding of the complaint and review the decision made at stage 1 as part of the complaint investigation	
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	Section 5 of our complaints policy states that the timescales to respond to a complaint at stage 2 will normally be no more than 7 working days from the date of stage 2 formal acknowledgement. If the response timeframe will take longer than 7 working days we will inform the customer, and in the event that the timescale will take longer than 20 working days we will agree this in advance with the customer and provide a full explanation.	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	As above section 5 of our policy states that the timescales to respond to a complaint at stage 2	

	complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.		will normally be no more than 7 working days from the date of stage 2 formal acknowledgement. If the response timeframe will take longer than 7 working days we will inform the customer, and in the event that the timescale will take longer than 20 working days we will agree this in advance with the customer and provide a full explanation	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	The Housing Ombudsman contact details are provided at each stage of the complaint, and when extending a complaint response HOS signposting is set out within all template letters	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Section 5 of our policy states that at both stages of our complaints process we provide a complaint response to the customer when the answer to the complaint is known not when the outstanding actions required to address the issue are completed.  Within our complaints procedure (Section 5.2) we also say that where we do need to manage customer	

			<p>feedback within our complaints service, we will make sure that all new complaints are responded to within our required timeframes when the answer to the complaint is known, not when all actions required to address the issue are completed regardless of timeframe.</p> <p>Actions outstanding from the complaint are tracked and delivered, with regular updates being provided to our customers</p>	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<p>Section 5 of our policy states that when we receive a complaint we will investigate fully and ensure we address all relevant aspects. In addition, our complaint template outcome letters clearly require all complaint leads to address every point of the complaint scope.</p>	
6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> </ul>	Yes	The complaint outcome template letters cover all the points as detailed by the Complaint Handling Code.	

	<ul style="list-style-type: none"> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul>			
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Section 5 of our complaints policy states that this is the final stage of our complaints process. Customers who remain unhappy with the outcomes of their complaint are able to refer their concerns to the Housing Ombudsman Service.</p> <p>The Service Improvement Team and stage 2 complaint leads have full autonomy and authority to resolve complaints and liaise with technical leads from the business to enable them to resolve complaints.</p>	

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>	Yes	<p>Within section 1 of our policy we state our approach to complaints as being that we:</p> <ul style="list-style-type: none"> <li>• Listen and understand.</li> <li>• Say sorry when we have got it wrong.</li> <li>• Put things right.</li> <li>• Learn and improve.</li> </ul> <p>Our Service Improvement team have the authority to put actions in place to put things right.</p> <p>The complaint closure letters clearly require the complaint handler to confirm the actions taken to put things right and any outstanding actions that are required.</p> <p>The team have agreed processes they follow including a compensation guide, action tracker, learnings, and training feedback</p>	



			<p>that can be shared with colleagues.</p> <p>We also share the spotlight reports from the Housing Ombudsman to ensure that we consider the recommendations put forward and implement where reasonable and practicable to do so.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Within our compensation guidance taking the right action means trying to repair our relationship with the customer, rebuilding their confidence in what we do, and putting the customer back in the position they would have been in if a service failure hadn't taken place.</p> <p>All colleagues are aware our internal compensation guidance which includes both statutory and discretionary compensation. The compensation table reflects the possible levels of impact to the customer and offers appropriate remedies depending on the level and frequency of service failure and the detriment and inconvenience caused to the</p>	

			customer.	
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<p>Our compensation guidance is based on the principle of what’s fair and reasonable in the circumstances, taking into account the customer’s individual experience , our obligations as a social landlord, and the expectations of all LiveWest customers generally.</p> <p>Any payments made under the guidance should be proportionate to any shortfalls in service to address:</p> <ul style="list-style-type: none"> <li>• The severity of the mistake or failures made.</li> <li>• The frequency with which something has occurred.</li> <li>• The level of distress, worry and inconvenience caused including the cumulative impact on the customer.</li> <li>• The length of time taken to address the service failure and restore the situation.</li> </ul>	

			<ul style="list-style-type: none"> <li>• Any necessary costs incurred by the customer.</li> <li>• The number of people affected and their vulnerabilities.</li> </ul> <p>Our complaint template letters include a section for compensation which asks the complaint lead to detail the level of compensation and for what issue, and the level of financial payment offered. The letter will also set out how the payment will be made and by when. The final response letter will outline all actions identified to put things right.</p>	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Section 8 of our policy states that we will have regard to our internal Compensation Guidance and the Housing Ombudsman’s Remedies Guidance in making assessments about appropriate remedies offers, including compensation payments and in some cases may need to seek legal advice.	

			We also review previous Housing Ombudsman cases and recent decisions.	
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## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ol style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>b. a qualitative and quantitative analysis of the landlord’s complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord’s performance from the Ombudsman; and</li> </ol>	Yes	<p>Section 11 of our policy includes the following:</p> <ul style="list-style-type: none"> <li>• We will report to the Customer Services committee at agreed intervals providing an overview of complaint handling and management.</li> <li>• We will publish details of the nature of complaints we receive and how we have learnt from them to our customers at least annually.</li> <li>• We will also produce and publish an annual Complaints Performance and Service Improvement Report.</li> </ul> <p>The annual Complaints Performance and Service Improvement Report will include the information as set</p>	

	f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.		out by the Housing Ombudsman Complaint Handling Code.	
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this	Yes	As above section 11 of our policy states that we will also produce and publish an annual Complaints Performance and Service Improvement Report.  In addition to this we will also publish the Board's response to the report alongside this on our website.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	We will repeat the self-assessment following significant change	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	We will comply with all HOS investigations, orders and recommendations	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must	Yes	If we are unable to comply with the code due to exceptional circumstances, we will inform the Ombudsman and customers and identify the timescale for restoring compliance	

	provide a timescale for returning to compliance with the Code.			
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## Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Section 9 of our policy states that we will use complaints, compliments, and feedback as opportunities to learn and improve our services. We will identify the causes of service failure and use this insight to address the underlying issues and improve services. We will use the compliments and positive feedback we receive from customers to help us understand what is important and inform future service design.	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Section 10 of our complaints policy states that we recognise that complaints form an integral part of our business service delivery. We place our customers at the heart of everything that we do and our behaviours require that all colleagues listen to and take account of our customers views. We will make colleagues aware of the	



			<p>importance of customer feedback in driving continuous improvement and the impact on customer service of a positive complaints culture.</p> <p>Section 5 of our approach to complaint learning states that the Research and Insight team will carry out periodic analysis into complaint themes and carry out a deep dive on identified themes. The results of the research will be shared with Customer Services Committee and Senior Managers</p>	
9.3	<p>Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.</p>	Yes	<p>Section 10 of our policy states that our colleagues will be trained on our approach to managing complaints ensuring that we achieve a consistent, high quality, transparent, customer-focussed response across the organisation.</p> <p>Section 6 of our approach to complaint learning states that we will ensure that periodic meetings, discussions, and reports share the lessons learnt from complaints and</p>	

			the actions we are taking to embed learning.	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Our Director of Neighbourhoods is accountable for our complaint handling.  The Director of Neighbourhoods oversees complaint handling performance and receives regular updates on volume, trends, satisfaction, complaint management and complaint learning.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Section 10 of our policy states that we have appointed a member of the Board to have lead responsibility for complaints (MRC)	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	The MRC will receive a quarterly complaints performance and insight report and will meet with the Service Improvement Team who are responsible for complaints	

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> <li>• regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>• regular reviews of issues and trends arising from complaint handling;</li> <li>• regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and</li> <li>• annual complaints performance and service improvement report.</li> </ul>	Yes	<p>Our Board receives:</p> <ul style="list-style-type: none"> <li>• Quarterly and annual performance information on complaint measures, including complaint volumes, the percentage of complaints responded to within timescale, performance against TSMs (including complaint satisfaction), learning and action plans to improve complaint handling.</li> <li>• Housing Ombudsman sector updates including spotlight reports and the annual performance report.</li> <li>• A report on individual HOS case outcomes, including any related to severe maladministration findings recommendations of the Ombudsman and steps we will take to rectify and prevent reoccurrence, and good practice findings</li> </ul>	
9.8	Landlords must have a standard objective in relation to complaint handling for all	Yes	Section 4 of our Approach to Learning from Complaints	

	<p>relevant employees or third parties that reflects the need to:</p> <ol style="list-style-type: none"> <li>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</li> <li>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</li> <li>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</li> </ol>		<p>framework recognises that it is important that all colleagues are aware of the complaints policy and procedure and can handle and record customers complaints. Colleagues should also be aware of who to refer to if they are not able to handle the matter personally. All colleagues are encouraged to try to resolve the complaint quickly, and as close to the point of service delivery as possible, to prevent escalation.</p> <p>All LiveWest colleagues are responsible for ensuring that they are aware of:</p> <ul style="list-style-type: none"> <li>• The need to complete all mandatory and refresher complaint handling training as required</li> <li>• The complaints policy, procedure, and compensation guidance;</li> <li>• How to handle and record customer complaints;</li> <li>• How to resolve customer complaints;</li> </ul>	
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			<ul style="list-style-type: none"><li>• Who they can refer a complaint to if they are unable to handle the matter personally;</li><li>• The need to try and resolve the complaint as soon as possible;</li><li>• Their personal authority to resolve the complaint including any limits linked to financial regulations.</li></ul>	
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