

## Appendix 4: Final self-assessment against the Housing Ombudsman's Complaint Handling Code

### Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <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>	Yes	<ul style="list-style-type: none"> <li>a. Policy 4.1</li> <li>b. Procedure 3.14</li> <li>c. Complaints training records of understanding</li> <li>d. Guide to giving feedback</li> <li>e. Easy read version of policy</li> <li>f. Intranet for employees</li> </ul>	Extract from policy: <i>4.1 We define a complaint as: "Any expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own employees, or those acting on its behalf, affecting an individual resident or groups of residents."</i>
1.3	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. A complaint	Yes	<ul style="list-style-type: none"> <li>a. Policy 5.1 and Policy 5.2</li> <li>b. Complaints training records of understanding</li> <li>c. Records of service requests that did not become a complaint</li> </ul>	Extract from policy: <i>5.1 "The customer does not have to use the word 'complaint' for it to be treated as such."</i>  <i>5.2 "A complaint that is submitted via a third party or</i>

	that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.		<p>d. Quarterly learning from complaints reports.</p>	<p><i>representative will still be handled in line with our complaints policy."</i></p> <p>Training is provided to employees and our contractor on what is a complaint and what is a service request. This includes the complaints flow charts and case studies from HO guidance.</p> <p>We actively monitor Service Requests and review for quality purposes to ensure compliance with the code. This reported to our Housing and Communities Committee and MRC in our quarterly reports.</p> <p>In-house complaint handling training (Nano e-learning) and Housing Ombudsman E-Learning was undertaken with all employees and contractors in Q1 2024/25 to ensure customers are given</p>
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				<p>the choice to make a complaint.</p> <p>HQN Training delivered a bespoke also provided in Q1 2024/25 to Complaint Investigators to ensure that they understand the requirements of the complaint handling code. A recording of this is provided to all new Complaint Investigators.</p>
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	<ul style="list-style-type: none"> <li>a. Policy 4.1 and 8.5</li> <li>b. Procedure 3.9 and 3.10</li> <li>c. Service requests dashboards</li> </ul>	<p>Extract from policy:</p> <p><i>4.1 "A Service Request is a request from a resident, that requires action to be taken to put something right. An example could be where a customer has not received a call back from us and to resolve it, they would like us to call them back. We then call the customer back which resolves the issue, and the customer is satisfied. If the</i></p>

				<p><i>customer is not satisfied with the action taken, this becomes a complaint."</i></p> <p><i>8.5 "If a customer is unhappy with a situation that they wish to have rectified, we will deal with this as a service request and aim to resolve within a timeframe that is acceptable to the customer and will keep them updated on progress. If further enquiries are needed to resolve the matter, or if the customer requests it, the issue will be logged as a formal complaint."</i></p> <p>Service requests and complaints are logged on our CRM system (CX) and dashboards have been implemented, so the Customer Feedback Team can record, monitor, and review trends in service requests. These have been reported to Housing and Communities Committee quarterly during the year.</p>
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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	<ul style="list-style-type: none"> <li>a. Policy 8.5</li> <li>b. CX system and dashboards</li> <li>c. Complaints training records of understanding</li> </ul>	<p>Extract from policy:</p> <p><i>8.5 "If further enquiries are needed to resolve the matter, or if the customer requests it, the issue will be logged as a formal complaint."</i></p> <p>CX (CRM) system and dashboards implemented, so the Customer Feedback Team can record, monitor, and review trends in Service Requests and escalate to a formal complaint if required or requested.</p> <p>In-house complaint handling training (Nano e-learning) and Housing Ombudsman E-Learning was undertaken with all employees and contractors in Q1 2024/25 to ensure customers are given the choice to make a complaint.</p> <p>HQN Training also provided in Q1 2024/25 to Complaint</p>
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				Investigators to ensure that they understand the requirements of the complaint handling code. A recording of this is provided to all new Complaint Investigators.
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.</p> <p>Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.</p>	Yes	a. Examples of customer satisfaction surveys	<p>Service Managers receive an email when dissatisfaction is expressed on the satisfaction survey and a new CX process is in place to ensure the customer is contacted if they have requested to discuss this further.</p> <p>From 1 April 2024 transactional surveys include a hyperlink to the Livin website on how to make a complaint and other survey formats also include this information.</p> <p>Customers are advised during a telephone or face to face survey (non-digital customers) of their right to make a</p>

				complaint and the customer is referred to the Customer Feedback Team if the customer indicates they wish to complain.
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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	<ul style="list-style-type: none"> <li>a. Policy 5.4</li> <li>b. Procedure 3.15-3.16</li> <li>c. CX system process</li> <li>d. Management oversight</li> </ul>	<p>Extract from policy:</p> <p><i>5.4 "Every complaint is different, and, in some cases, this policy will not apply, and a complaint will not be opened. If this happens, we will carefully consider why a complaint should not be opened and carefully consider the individual circumstances. We will provide an explanation of this to the customer setting out the reasons why the matter is not suitable for the complaints process and advising of the right to seek support from the Housing Ombudsman. We will also provide advice to the customer on the correct route for redress, where applicable."</i></p> <p>The reason for not accepting a complaint is also logged in the</p>



				<p>CX system. Exclusions are fed into and monitored through our power BI complaints dashboard.</p> <p>Management oversight and monitoring on reasons for not accepting a complaint is in place.</p>
2.2	<p>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:</p> <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 the Claim Form and Particulars of Claim,</li> </ul>	Yes	<ul style="list-style-type: none"> <li>a. Policy 5.5</li> <li>b. Procedure 3.15-3.16</li> <li>c. CX System</li> </ul>	<p><i>Extract from policy:</i></p> <p><i>5.5 "Examples of where a complaint might not be opened include:</i></p> <ul style="list-style-type: none"> <li>• <i>A matter that has previously been fully investigated through the complaints process and a full written response was given, in line with this policy</i></li> <li>• <i>Something which happened, or which the customer knew of, more than twelve months before contacting us</i></li> <li>• <i>An issue where legal proceedings have started</i></li> </ul>

	<p>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>			<p><i>where the Claim Form and Particulars of Claim have been filed at court</i></p> <ul style="list-style-type: none"> <li>• <i>An anonymous complaint that does not provide enough information to investigate. In these cases, the Customer Experience Manager will decide if a complaint can be opened depending on the seriousness and if it is possible to investigate it"</i></li> </ul> <p>The reason for not accepting a complaint is also logged in the CX system. Exclusions are fed into and monitored through our power BI complaints dashboard.</p> <p>Management oversight and monitoring on reasons for not accepting a complaint is in place.</p>
2.3		Yes	<p>a. Policy 5.5 b. Procedure</p>	<i>Extract from policy: 5.5</i>

	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.		c. CX System d. Management assurance audits	<p><i>"Something which happened, or which the customer knew of, more than twelve months before contacting us"</i></p> <p>5.4 – We use our discretion when considering opening complaints that are over the 12-months period.</p> <p>The reason for not accepting a complaint is also logged in the CX system. Exclusions are fed into and monitored through our power BI complaints dashboard.</p> <p>Management oversight and monitoring on reasons for not accepting a complaint is in place.</p> <p>Discretion was used to consider complaint elements that were outside the 12-month time limit.</p>
2.4	If a landlord decides not to accept a complaint, an explanation must be	Yes	a. Policy 5.4 b. CX System	<p>Extract from policy:</p> <p><i>5.4 "...We will provide an explanation of this to the</i></p>

	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.		c. Management assurance audits	<p><i>customer setting out the reasons why the matter is not suitable for the complaints process and advising of the right to seek support from the Housing Ombudsman. We will also provide advice to the customer on the correct route for redress, where applicable."</i></p> <p>The reason for not accepting a complaint is also logged in the CX system. Exclusions are fed into and monitored through our power BI complaints dashboard.</p> <p>Management oversight and monitoring on reasons for not accepting a complaint is in place.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	a. Policy 5.4 and Policy 8.29	<p>Extract from policy:</p> <p><i>5.4 "Every complaint is different, and, in some cases, this policy will not apply, and a complaint will not be opened. If this happens, we will carefully consider why a complaint should</i></p>

				<p><i>not be opened and carefully consider the individual circumstances."</i></p> <p><i>8.29 "Customer feedback from complaints is valuable to us and we will look beyond the circumstances of the individual tenant."</i></p>
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### 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	<ul style="list-style-type: none"> <li>a. Policy 8.2-8.3</li> <li>b. Monitoring of service access levels and customer demographics</li> <li>c. Analysis of complaints satisfaction data</li> <li>d. Vulnerability policy</li> <li>e. EVIA</li> <li>f. Telephone and document translation (Big Word)</li> <li>g. Documents in other languages</li> <li>h. CX Process for Translation requests</li> <li>i. Livin Life your Way leaflet</li> <li>j. Tenancy Visit (non-digital flyer)</li> <li>k. Annual Rent increase letter</li> </ul>	<p>Extract from Policy</p> <p><i>8.2 "We will offer a range of options to give feedback including:</i></p> <ul style="list-style-type: none"> <li>• <i>In person to any member of staff</i></li> <li>• <i>Via telephone</i></li> <li>• <i>In writing</i></li> <li>• <i>Email</i></li> <li>• <i>Website</i></li> <li>• <i>Live Chat</i></li> <li>• <i>Satisfaction Surveys</i></li> <li>• <i>My Livin App</i></li> <li>• <i>Social media (we will invite customers to direct message us to maintain confidentiality)"</i></li> </ul> <p><i>8.3 "We will respond to reasonable adjustment requests in line with the Equality Act 2010 and we will work with customers who have specific needs and vulnerabilities</i></p>

			<p>l. Visiting cards</p>	<p><i>to make sure they can access the service, have their views listened to and receive their complaint response in a way that meets their needs.</i> For example, we can provide a translation service and will also accept complaints via a third party or representative such as a carer, other family member, a local councillor or a MP. This must be with the written consent of the complainant."</p> <p>We translated our guide to giving feedback for 2 individual customers into Arabic during the year. There is a language panel on the document and the summarised version of the policy on our website explaining that we can translate.</p> <p>We provide information on how to complain to our tenants who are non-digital including out 'Livin Life Your Way' leaflet, Tenancy Visit flyers, Annual Rent increase letters and any visiting cards left by repairs operatives.</p>
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3.2	Residents must be able to raise their complaints in any way and with any member of staff. 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.	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.2 and 8.6</li> <li>b. Training to staff, training records and confirmation of understanding</li> </ul>	<p>Extract from policy:</p> <p><i>8.2 "We will offer a range of options to give feedback through the following channels: In person to any member of staff"</i></p> <p><i>8.6 "All complaints (see definition at 4.1) we receive will be referred to the Customer Feedback Team for oversight regardless of who the complaint is initially referred to. This will ensure that all customers receive equality of service in complaints resolution and that they are kept informed of progress."</i></p> <p>In-house complaint handling training (Nano e-learning) and Housing Ombudsman E-Learning was undertaken with all employees and contractors in Q1 2024/25 to ensure customers are given the choice to make a complaint.</p> <p>HQN Training is also provided to Complaint Investigators to ensure</p>
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				that they understand the requirements of the complaint handling code. We monitor this through our complaints process and any opportunities for learning and development are logged through our HR system, to ensure future compliance.
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	<ul style="list-style-type: none"> <li>a. Annual Report to Tenants</li> <li>b. Quarterly Performance and Learning Report for Housing and Communities Committee</li> <li>c. Complaint KPIs</li> <li>d. Website pages on complaints and feedback</li> <li>e. Non-digital 'how to complain' examples</li> </ul>	<p>Complaint numbers have almost doubled from 23/24 - 24/25 which indicates that our complaint service is accessible. This was following our efforts to advertise our complaints service and increase accessibility to non-tenants. We do not set targets to keep complaints numbers down and we report on complaints trends and learning to Housing and Communities Committee. The focus is on learning from complaints and improving services, not reducing complaint numbers.</p> <p>Complaints data is published on Livin's website.</p>

				<p>We also publish learning from complaints to increase awareness about the service and to encourage people to use the service if they have an issue they need to resolve.</p> <p>We provide hard copies of leaflets containing information about 'how to complain' to tenants that are unable to access digital services.</p>
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	<ul style="list-style-type: none"> <li>a. Policy 8.3 and 8.38</li> <li>b. Website</li> <li>c. Guide to giving feedback</li> <li>d. Easy read version of policy</li> </ul>	<p>Extract from policy:</p> <p><i>8.3 "We will respond to reasonable adjustment requests in line with the Equality Act 2010 and we will work with customers who have specific needs and vulnerabilities to make sure they can access the service, have their views listened to and receive their complaint response in a way that meets their needs."</i></p> <p><i>8.38 "We are committed to the provision of seamless, responsive and convenient services and as</i></p>

				<p><i>such are a digital first organisation. We advocate encourage and support our tenants to engage with us via the most efficient and effective method, suitable to their needs, and will assist tenants or their advocates to engage with us digitally, where possible. Digital copies of this policy and related guidance are available on our website and in an alternative format for tenants who may not be able to access services digitally or experience other communication barriers. Information on how to access the service will be promoted across different channels to ensure all customers are aware of how to make a complaint and what their rights are."</i></p> <p>The policy is published on website in both full and summarised/accessible versions: <a href="http://www.livin.co.uk">Our Policies   www.livin.co.uk</a></p>
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				<p>ReciteMe, the Accessibility tool is available on the website and translation services are available.</p> <p>The guide to giving feedback gives details of the process in plain English, which has been updated in line with the new code. This guide can be available in the required accessible formats.</p> <p>During the year we have issued every non-digital resident with a paper version of the Guide to Giving Feedback, which is simplified version of the Policy and explains the two-stage process.</p> <p>We translated our guide to giving feedback for 2 individual customers into Arabic during the year. There is a language panel on the document and the summarised version of the policy on our website explaining that we can translate.</p>
3.5		Yes	a. Policy 8.40	Extract from Policy:

	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.		b. Website	<p><i>8.40 "Details of the Housing Ombudsman will be published on our website, in key information provided to tenants and in communications from the complaints and feedback service."</i></p> <p>The policy is published on our website and is available in other formats. Housing Ombudsman details are on the website and also included in all formal complaint closing letters.</p>
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	<p>a. Policy 5.2 and 8.3</p> <p>b. CX system process</p>	<p>Extract from policy:</p> <p><i>5.2 "A complaint that is submitted via a third party or representative will still be handled in line with our complaints policy."</i></p> <p><i>8.3 "We will respond to reasonable adjustment requests in line with the Equality Act 2010 and we will work with customers who have specific needs and vulnerabilities to make sure they can access the service, have their views listened to</i></p>

				<p><i>and receive their complaint response in a way that meets their needs. For example, we can provide a translation service and will also accept complaints via a third party or representative such as a carer, other family member or a MP. This must be with the written consent of the complainant."</i></p> <p>The CX process includes 'advocate details' to ensure the complaints team can input any relevant details for future/further contact</p> <p>We handled 5 complaints via a third party during 2024/25.</p>
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<ul style="list-style-type: none"> <li>a. Policy 5.4, 8.12, 8.18, 8.21</li> <li>b. Quality assurance checks of complaints communications including outcome letters</li> <li>c. Website</li> </ul>	<p>Extract from policy:</p> <p><i>5.4 "We will provide an explanation of this to the customer setting out the reasons why the matter is not suitable for the complaints process and advising of the right to seek support from the Housing Ombudsman."</i></p>

			<ul style="list-style-type: none"> <li>d. Complaints Stage 1 and 2 Letters</li> <li>e. Emails to tenants from Complaints Team</li> <li>f. Annually in Rent Increase letters</li> </ul>	<p><i>8.12 Stage 1 – ‘The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed’.</i></p> <p><i>8.18 Stage 2 – “The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed.”</i></p> <p><i>8.21 “Stage Two is our final response to the complaint. If the customer is not satisfied with the outcome of the investigation at Stage Two, they can take their complaint to the Housing Ombudsman, who will advise if their complaint falls within its jurisdiction.”</i></p> <p>We also include the information on our website:  <a href="http://www.livin.co.uk">Housing Ombudsman   www.livin.co.uk</a>  In our Guide to giving feedback, we explain that the HO can be contacted at any time prior to,</p>
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				during and after a complaint for advice and guidance if needed.
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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	<ul style="list-style-type: none"> <li>a. Policy 8.7, 9.1 and 11</li> <li>b. Performance and assurance reporting on complaints trends, learning and performance to Committee and Board</li> <li>c. Team structure</li> </ul>	<p>Extract from policy:</p> <p><i>8.7 "Complaints will be dealt with impartially and confidentially by a 'complaints investigator'."</i></p> <p><i>9.1 "The Customer Experience Manager has responsibility for the overall implementation and monitoring of this policy, driving learning and improvement, as is the organisation's designated Complaints Officer."</i></p> <p>Section 11 of the policy includes roles and responsibilities of complaint handling including the role of Board and Housing and Communities Committee (HACC) in seeking assurance.</p> <p>We have designated team members in the Customer Feedback Team, who are</p>

				responsible for supporting complaints investigators throughout the process.
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	a. Procedure 4.13 b. Training records	<p>There is a cross-department bank of complaints investigators at all levels across the organisation. Complaints are allocated to an investigator with the relevant knowledge and skills to understand the issue and resolve quickly.</p> <p>Employees have received HO training:</p> <ul style="list-style-type: none"> <li>- Attitudes, Rights and Respects</li> <li>- Dispute Resolution.</li> </ul> <p>Bespoke HQN training package is provided to all Complaint Investigators to ensure that they understand the requirements of the complaint handling code.</p>
4.3		Yes	a. Procedure b. Training records	Complaint Training with all employees in June 2024. Individual

	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant 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>c. Monthly 'Learning from Complaints' reports for Heads of Service</p> <p>d. Bi-monthly 'Learning from Complaints' meetings with Heads of Service</p>	<p>further training and support is provided to all complaint investigators throughout their complaint investigation.</p> <p>Monthly 'Learning from Complaints' reports for Heads of Service</p> <p>Bi-monthly learning from complaints meetings with Heads of Service.</p> <p>In-house complaint handling training (Nano e-learning) and Housing Ombudsman E-Learning was undertaken with all employees and contractors in Q1 2024/25 to ensure customers are given the choice to make a complaint.</p> <p>HQN Training is also provided to Complaint Investigators to ensure that they understand the requirements of the complaint handling code.</p> <p>In 2024/25 there has been a restructure within the Customer</p>
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				Feedback Team to ensure consistent and effective complaint handling. We have introduced a Senior Feedback Advisor, recruited a second Feedback Advisor and regraded the Feedback Assistant role in recognition of the Code requirements.
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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	<ul style="list-style-type: none"> <li>a. Policy</li> <li>b. Website – complaints and feedback page</li> <li>c. Guide to giving Feedback</li> <li>d. Training certificates logged on HR system</li> </ul>	<p>We have a single policy in place for handling complaints.</p> <p>Our website contains information about complaints, our complaints policy and a guide to giving feedback <a href="http://www.livin.co.uk">Customer Feedback and Complaints   www.livin.co.uk</a></p> <p>Our Guide to Giving Feedback states:  <i>"Your right to services will not be affected if you make a complaint. We need to know so that we can make changes and stop these problems happening again. Your complaint is the first step in helping us put matters right."</i></p> <p>Completed training and culture work to ensure staff are treating all customers with respect via</p>

				HO Attitudes Rights and Respect training.
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	a. Policy 8.8	Extract from policy: <i>8.8 "Our complaints procedure is made up of two stages."</i>
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	a. Policy 8.8	Extract from policy: <i>8.8 "Our complaints procedure is made up of two stages."</i>

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	a. Policy 5.3	<p>Extract from policy:</p> <p><i>5.3 "This policy applies to all Board members, employees and partners/contractors working on behalf of Livin."</i></p> <p>Our complaints process responses are not handled by a third-party. Partners/contractors will assist the team to investigate and resolve an issue where required.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	a. Compliance checks b. Monthly 'Learning from complaints' reports c. Attendance of Livin/contractor's operational meetings	<p>Our complaints process responses are not handled by a third-party. Partners/contractors will assist the team to investigate and resolve an issue where required.</p> <p>Monthly reports are provided to the head of property services who shares these findings with our contractor Mears.</p>

				<p>Operational meetings held by Livin and Mears are attended by the Complaints and Feedback manager to share learning from complaints to progress actions and to resolve any issues relating to the resolution of complaints.</p> <p>Toolbox Talks are delivered to operatives to ensure any learning from complaints is understood and taken on board.</p>
5.6	<p>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 complaint is unclear, the</p>	Yes	<p>a. Policy 8.9 and 8.11 b. Quality checks of the investigation and outcome</p>	<p>Extract from policy:</p> <p><i>8.9 “... We will acknowledge, define, and log the complaint within five working days of the complaint being received, and contact the customer to clarify the exact complaint definition and desired resolution.”</i></p> <p><i>8.11 “... All points raised in the complaint definition will be addressed, with clear reasons for</i></p>



	resident must be asked for clarification.			<i>the decision to uphold, or not uphold..."</i>
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	<ul style="list-style-type: none"> <li>a. Policy 8.9</li> <li>b. Quality checks of the investigation and outcome</li> </ul>	<p>Extract from policy:</p> <p><i>8.9 "... We will acknowledge, define, and log the complaint within five working days of the complaint being received, and contact the customer to clarify the exact complaint definition and desired resolution."</i></p> <p>The complaint definition is confirmed by the Complaints Team during acknowledgement of a complaint and again by the complaint investigator.</p> <p>If the feedback relates to a service we do not deliver or an asset we do not own we will contact and advise the customer what we are and are not responsible for.</p>

				Communication via phone or email to tenants if not accepted as a complaint
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</li> </ul>	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.10</li> <li>b. Procedure</li> <li>c. Quality checks of the investigation and outcome</li> <li>d. Complaint handling satisfaction monitoring</li> </ul>	<p>Extract from policy:</p> <p><i>8.10 "The complaint will then be assigned to a complaints officer who will:</i></p> <ul style="list-style-type: none"> <li>• <i>Deal with complaints on their merits, act independently, and have an open mind,</i></li> <li>• <i>Give the customer a fair chance to set out their position,</i></li> <li>• <i>Take measures to address any actual or perceived conflict of interest; and</i></li> <li>• <i>Consider all relevant information and evidence carefully. "</i></li> </ul> <p>Expectations aligned with the section of the Code are set out</p>

	information and evidence carefully.			for Complaint Handlers in our Procedure.
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	<ul style="list-style-type: none"> <li>a. Policy 8.12 and 8.18</li> <li>b. Performance monitoring of complaints handled in timescales, both internal and TSM metrics</li> </ul>	<p>Extract from policy:</p> <p><i>8.12 "Stage 1 - If there are mitigating reasons to extend this period, any extension will be at the agreement of the customer and will be no more than 10 working days without good reason. For example, the customer may be uncontactable, or the complaint may be complex. The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed."</i></p> <p><i>8.18 "Stage 2 - If there are mitigating reasons to extend this period, any extension will be at the agreement of the customer and will be no more than 20 working days without good</i></p>

				<p><i>reason. The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed."</i></p> <p>Performance metrics are monitored and reported. Complaints satisfaction and TSM's are reported quarterly to Board as part of the Performance Management Framework.</p>
5.10	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.3</li> <li>b. Process to record adjustments</li> <li>c. Assurance monitoring that adjustments have been recorded and have been carried out</li> <li>d. Customer Vulnerability policy</li> </ul>	<p>Extract from policy:</p> <p><i>8.3 "We will respond to reasonable adjustment requests in line with the Equality Act 2010 and we will work with customers who have specific needs and vulnerabilities to make sure they can access the service, have their views listened to and receive their complaint response in a way that meets their needs. For example, we can provide a translation service and will also accept complaints via a third party or representative such as a</i></p>

				<p><i>carer, other family member or a MP. This must be with the written consent of the complainant."</i></p> <p>Our Customer Vulnerability Policy outlines the principles, values, and commitments we are making at Livin to ensure equality, diversity and inclusion is embedded across the organisation. We aim to ensure that our services are accessible and flexible to the different needs of individuals and communities by using customer intelligence in a systematic way to delivers a brilliant customer experience that meets the personalised needs of our customers. We ensure the different needs of customers are built into the design of services via Equality and Vulnerability Assessments (EVAs), transactional feedback resident involvement/customer voice opportunities and scrutiny reviews.</p>
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				This monitored via an Equality, Diversity, Inclusion and Vulnerabilities Monitoring Report submitted to the Housing and Communities Committee.
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	a. Policy 5.4-5.5 b. Policy 8.15	Exclusions included in policy 5.4-5.5  Extract from policy:  <i>8.15 "If all, or part of the complaint is not resolved to the customer's satisfaction at Stage One, it will be escalated to Stage Two."</i>
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	Yes	a. CX System b. Compliance checks	All records and supporting documentation kept in CX system.  Compliance checks are undertaken to make sure

	correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			<p>everything is properly recorded in the system.</p> <p>Compliance check lists have been added to CX process, and to be completed on day 8 of investigation.</p>
5.13	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.	Yes	<p>a. Policy 8.32</p> <p>b. CX System</p> <p>c. Complaints meetings and quarterly reporting</p>	<p>Extract from policy:</p> <p><i>8.32 "We aim to provide high quality services and to resolve any issues before the need for a compensation payment arises.</i></p> <p><i>8.33 The aims of the compensation procedure are to ensure that:</i></p> <ul style="list-style-type: none"> <li><i>• Problems are resolved quickly and efficiently</i></li> <li><i>• Practical solutions are explored completely to remedy the situation</i></li> <li><i>• Where financial payments are appropriate, they are proportionate to the loss or inconvenience caused</i></li> </ul>

				<ul style="list-style-type: none"> <li>• <i>Financial payment is considered against clear agreed guidelines, and</i></li> <li>• <i>All customers are treated in a fair and equitable way “</i></li> </ul> <p>Any actions identified to remedy a complaint are raised through our ‘Action Tracker’ process, implemented within CX system to log and monitor outstanding actions for the customer during, and after the complaint has closed.</p> <p>Monitoring of progress against actions undertaken by the complaints team and tracked in meetings with managers. Assurance is reported through to EMT and Housing and Communities Committee</p>
5.14		Yes	a. Policy 8.24	Extract from policy:



	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.		b. Unacceptable Complainant Behaviour procedure	<p><i>8.24 "We will apply the Unacceptable Complainant Behaviour Procedure when the criteria for unacceptable behaviour is met. We will aim to make sure this does not close off routes of redress for the customer."</i></p> <p>The Complaints team log evidence to inform decision making and records are kept ensuring this is reviewed in line with the procedure.</p>
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>a. Policy 8.26</p> <p>b. Unacceptable Complainant Behaviour Procedure.</p>	<p>Extract from policy:</p> <p><i>8.26 "Where unacceptable complainant behaviour is believed to be caused by a person's disability, illness or other vulnerability, they will be treated with sensitivity and will be offered the opportunity to appoint an advocate to act on their behalf. Any restrictions placed on contact due to</i></p>

				<p><i>unacceptable behaviour will be proportionate and demonstrated in line with the Equality Act 2010 and our Inclusive Services Policy."</i></p> <p>The Unacceptable Complainant Behaviour Procedure explains the process.</p>
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## 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	<ul style="list-style-type: none"><li>a. Policy 8.9</li><li>b. Performance measures, monitoring, and reporting</li></ul>	<p>Extract from policy:</p> <p><i>8.9 "We aim to deal with all complaints promptly. We will acknowledge, define, and log the complaint within five working days of the complaint being received, and contact the customer to clarify the exact complaint definition and desired resolution."</i></p> <p>All complaints acknowledged within 5 working days, in line with Housing Ombudsman code. Where this is not done, we recognise a service failure for complaint handling and offer compensation.</p> <p>We have performance measures that cover the acknowledgement stage of complaints.</p>

				The average number of days for handling a Stage 1 complaint was 10.16 working days.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received</u> .	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.9</li> <li>b. Performance measures, monitoring and reporting</li> <li>c. CX timescale recording</li> </ul>	<p>Extract from policy</p> <p><i>8.9 "We aim to deal with all complaints promptly. We will acknowledge, define, and log the complaint within five working days of the complaint being received, and contact the customer to clarify the exact complaint definition and desired resolution"</i></p> <p>95.24% were dealt with in these timescales during 2024/25.</p>
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.11</li> <li>b. Performance Measures on complaints handled within ten days</li> </ul>	<p>Extract from policy:</p> <p><i>8.11 "A full written response of the investigation will be issued within 10 working days of the complaint being acknowledged. All points raised in the complaint definition</i></p>

			c. CX timescale recording	<p><i>will be addressed, with clear reasons for the decision to uphold, or not uphold the complaint provided, referencing the relevant policy, law, and good practice where appropriate."</i></p> <p>91.88% were dealt with in these timescales during 2024/25.</p>
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	<p>a. Policy 8.12 and 8.18</p> <p>b. Performance measures</p>	<p>Extract from policy:</p> <p><i>8.12 "If there are mitigating reasons to extend this period, any extension will be at the agreement of the customer and will be no more than 10 working days without good reason. For example, the customer may be uncontactable, or the complaint may be complex. The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed."</i></p>

				<p>We have a performance management framework to track complaints resolved within the initial ten-day timescale and overall compliance with timescales set out in the Policy and the Code.</p> <p>100% of complaints were investigated and closed within the Code timescales including the use of extensions.</p>
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	<ul style="list-style-type: none"> <li>a. Policy 8.12</li> <li>b. Template of email sent to customers</li> </ul>	<p>Extract from policy:</p> <p><i>8.15 "...The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed."</i></p>
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 the issue	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.13</li> <li>b. CX complaint Actions</li> <li>c. Monthly complaint meetings and</li> </ul>	<p>Extract from policy:</p> <p><i>The complaint response will be provided when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed.</i></p>

	are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		assurance reporting	<p><i>Outstanding actions will be tracked, and the customer will be kept informed.</i></p> <p>Outstanding actions are identified in closing letters and all actions logged and monitored on the CX system by the Customer Feedback Team.</p> <p>Assurance on progress made with completing wider learning and service improvements is provided in quarterly complaints learning and case review reports.</p>
6.7	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	<ul style="list-style-type: none"> <li>a. Policy 8.11 and 8.17</li> <li>b. Quality assurance checks on complaints investigations and outcome letters</li> </ul>	<p>Extract from policy:</p> <p><i>8.11 "All points raised in the complaint definition will be addressed, with clear reasons for the decision to uphold, or not uphold, referencing the relevant policy, law, and good practice where appropriate."</i></p>

				Stage 2 provides the opportunity to ensure that all points were fully addressed at Stage 1.
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	a. Policy 8.14 b. Performance monitoring and reporting on complaints dealt with in time	<p>Extract from policy:</p> <p><i>8.14 "A customer can raise additional complaints during the investigation, these will be incorporated into the Stage One response if they are related, and the response has not yet been issued. Where a response has not been issued but the issues are unrelated, or it would unreasonable delay the response, the new issues will be logged as a new complaint."</i></p> <p>Where the decision is made to open a new Stage 1 complaint, we will inform the customer of this.</p>
6.9	Landlords must confirm the following in writing to the	Yes	a. Policy. 8.11 - 8.14 b. Procedure	The Complaints and Feedback Team and Complaint Investigator



	<p>resident at the completion of stage 1 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> <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 stage 2 if the individual is not satisfied with the response.</li> </ul>		<ul style="list-style-type: none"> <li>c. Quality assurance checks on complaints investigations and outcome letters</li> <li>d. Example of a closing letter</li> </ul>	<p>will agree all issues and requests for resolution upon receipt of the complaint. These will form the content of the complaint closing letter</p> <p>The closing letter is based on a template issued by the Housing Ombudsman Service as good practice</p>
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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	<ul style="list-style-type: none"> <li>a. Policy 8.15 &amp; 8.21</li> <li>b. Procedure 4.22 and 4.37</li> <li>c. Quality assurance checks on complaints investigations and outcome letters</li> </ul>	<p>Extract from policy:</p> <p><i>8.15</i> "If all, or part of the complaint is not resolved to the customer's satisfaction at Stage One, the customer can ask to escalate their complaint to Stage Two. This should be done within 20 working days of the written complaint response being issued to the customer. We will acknowledge, define, and log the Stage Two complaint within five working days of the request being received or explain if there is reason the complaint will not be investigated further."</p> <p><i>8.21</i> "If the customer is not satisfied with the outcome of the investigation at Stage 2, they can take their complaint to the Housing Ombudsman, who will</p>

				<p><i>advise if their complaint falls within its jurisdiction."</i></p> <p>In 2024/25 we escalated a total of 24 complaints to a Stage 2 complaint and a total of 7 decisions were overturned following the Stage 2 review</p>
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	<ul style="list-style-type: none"> <li>a. Policy 8.15</li> <li>b. Procedure 4.23</li> <li>c. Performance measures, monitoring, and reporting</li> <li>d. Example of escalation request</li> </ul>	<p>Extract from policy:</p> <p><i>8.15 "...We will acknowledge, define, and log the Stage Two complaint within five working days of the request being received."</i></p> <p>We have performance measures that cover the acknowledgement of complaints at Stages 1 and 2. This is reported to Board.</p>
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.16</li> <li>b. Procedure 4.23</li> </ul>	<p>Extract from policy:</p> <p><i>8.16 "They will review the handling and decision making at Stage</i></p>

	make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			<p><i>One and make reasonable efforts to understand why the customer remains unhappy."</i></p> <p>Our approach is to review all Stage 2 requests within the relevant timescales upon request. Customers will often provide reasons for escalation at the same time and whilst that information is logged, it is not a requirement.</p>
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	a. Policy 8.16 b. Procedure 4.26	<p>Extract from policy:</p> <p><i>8.16 "The Complaint Officer for the Stage Two investigation will be different to Stage 1 and it will be given to a senior manager, independent of the service area being complained about."</i></p>
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the	Yes	a. Policy 8.17 b. Procedure 4.34 c. Performance monitoring	<p>Extract from policy:</p> <p><i>8.17 "The customer will be issued a full written response within 20</i></p>

	complaint being acknowledged.		and assurance reporting	<p><i>working days of the complaint being acknowledged."</i></p> <p>We have a performance measure that covers the Stage 2 timescales of investigation. We did not meet our target of 100% completion within 20 working days (91.67%), as we extended a total of 2 complaints within the HO's complaint handling code guidelines.</p>
6.15	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 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.18</li> <li>b. Procedure 4.34</li> <li>c. Performance monitoring and assurance reporting on complaint handling timescales</li> </ul>	<p>Extract from policy:</p> <p><i>8.18 "If there are mitigating reasons to extend this period, any extension will be at the agreement of the customer and will be no more than 20 working days without good reason. The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed."</i></p> <p>In 2024/25 we extended a total of 2 Stage 2 complaints by a further</p>

				20 working days, in line with the HO's Complaint Handling Code.
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	<ul style="list-style-type: none"> <li>a. Policy 8.18</li> <li>b. Example of email to customer</li> </ul>	<p>Extract from policy:</p> <p><i>8.18 "If there are mitigating reasons to extend this period, any extension will be at the agreement of the customer and will be no more than 20 working days without good reason. The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed."</i></p>
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	<ul style="list-style-type: none"> <li>a. Policy 8.19</li> <li>b. Assurance reporting</li> <li>c. CX complaint actions</li> <li>d. Monthly HoS reports, bi-monthly meetings and minutes</li> </ul>	<p>Extract from policy:</p> <p><i>8.19 "The complaint response will be provided when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked, and the customer will be kept informed."</i></p>

				<p>Outstanding actions for the customer are tracked within CX.</p> <p>Monthly HoS reports and bi-monthly meetings track progress with any outstanding actions and assurance is provided to Executive Management Team and Housing and Communities Committee on progress against the overall actions.</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	<ul style="list-style-type: none"> <li>a. Policy 8.17</li> <li>b. Procedure 4.17 and 4.33</li> <li>c. Quality assurance checks on letters and investigations</li> </ul>	<p>Extract from Policy:</p> <p><i>8.17 "All points raised in the complaint definition will be addressed, with clear reasons for the decision to uphold, or not uphold the complaint provided, referencing the relevant policy, law, and good practice where appropriate."</i></p>
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.17</li> <li>b. Procedure</li> <li>c. Complaint letter template</li> </ul>	<p>Extract from Policy:</p> <p><i>8.17 "All points raised in the complaint definition will be addressed, with clear reasons for</i></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> <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>		<ul style="list-style-type: none"> <li>d. Quality assurance checks on letters and investigations</li> </ul>	<p><i>the decision to uphold, or not uphold the complaint provided, referencing the relevant policy, law, and good practice where appropriate."</i></p> <p>The Complaints Team and Complaint Investigator will agree all issues and requests for resolution upon receipt of the complaint. These will form the content of the complaint closing letter.</p>
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.21</li> <li>b. Procedure</li> </ul>	<p>Extract from policy:</p> <p><i>8.21 "Stage 2 is our final response to the complaint. If the customer is not satisfied with the outcome of the investigation at Stage 2, they can take their complaint to the Housing Ombudsman, who</i></p>



				<i>will advise if their complaint falls within its jurisdiction."</i>
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## 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> </ul>	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.32 - 8.36</li> <li>b. Procedure</li> <li>c. Compensation Procedure</li> <li>d. Quality assurance checks on remedies and compensation</li> <li>e. Examples of a letter</li> <li>f. Action tracker</li> <li>g. Service Improvement</li> </ul>	<p>The Policy includes a section on learning from complaints (8.28-8.30) and compensation and remedies (8.32-8.36)</p> <p>In Q1 24/25 the Compensation and Remedies in Relation to Complaints Procedure was updated in line with HO remedies guidance.</p>

	<ul style="list-style-type: none"> <li>Changing policies, procedures or practices.</li> </ul>			
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	a. Policy 8.34 b. Procedure 4.21 and 4.36 c. Compensation Procedure	<p>Extract from Policy:</p> <p><i>8.34 "The following list is an example of the types of remedy that may be made in relation to a complaint, but it is not exhaustive:            Loss of / damage to personal possessions            Financial loss            Payment for distress and inconvenience Time and trouble "</i></p> <p>We take into consideration any vulnerabilities within the household, which may have been impacted by the subject of their complaint and the period of that impact, when determining appropriate remedies.</p> <p>In Q1 24/25 Compensation and Remedies in Relation to</p>

				Complaints Procedure was updated in line with HO remedies guidance.
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	<ul style="list-style-type: none"> <li>a. Complaint letter template</li> <li>b. Action tracker dashboard</li> <li>c. Quality assurance checks on letters and investigations</li> </ul>	<p>The complaint letter template includes a section on next steps taken to remedy the issues.</p> <p>The actions needed to resolve the issue, the target date for resolution and responsibility for the actions will be relayed to the customer</p>
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<ul style="list-style-type: none"> <li>a. Compensation Procedure</li> </ul>	<p>In Q1 24/25 our Compensation and Remedies in Relation to Complaints Procedure was updated in line with HO remedies guidance.</p> <p>We also consider relevant HO cases for guidance on remedies.</p>

## Section 8: Self Assessment, reporting and compliance

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> <ul style="list-style-type: none"> <li>the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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> </ul>	Yes	a. Performance and Service Improvement Report	We have produced the annual complaints performance and service improvement report in line with the requirements of the Code including the timescale set by the HO.

	<ul style="list-style-type: none"> <li>• any findings of non-compliance with this Code by the Ombudsman;</li> <li>• the service improvements made as a result of the learning from complaints;</li> <li>• any annual report about the landlord's performance from the Ombudsman; and</li> <li>• any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul>			
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 section of its website relating to complaints. The	Yes	a. Policy 11.1 b. Annual Report to Tenants c. Performance Measures	The complaints performance and service improvement report is reported to Board and published on our website, along with a copy of the Board's response. <a href="http://www.livin.co.uk">Customer Feedback and Complaints   www.livin.co.uk</a>

	governing body's response to the report must be published alongside this.			
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	No current evidence as not currently applicable	We would apply this in the event of a significant change.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	No current evidence as this has not been requested	We would review and update the self-assessment if requested by the Housing Ombudsman.
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 provide a	Yes	No current evidence as not currently applicable	In the event of any exceptional circumstances that would affect compliance with the Code, we would inform all affected residents and the Housing Ombudsman.

	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	<ul style="list-style-type: none"> <li>a. Policy 8.29 – 8.30</li> <li>b. Procedure 4.13 and 4.29</li> <li>c. Assurance reporting to Board and Housing and Communities Committee</li> <li>d. Case Reviews</li> </ul>	<p>Extract from Policy:</p> <p><i>8.29 "Customer feedback from complaints is valuable to us and we will look beyond the circumstances of the individual tenant and use this as a source of intelligence to drive positive change, development, and improvement to our services."</i></p> <p><i>8.30 "We will ensure that we are accountable and transparent in our complaint handling and will report on wider learning and improvements to our Board, the Housing Ombudsman and customers."</i></p> <p>Trends are monitored for systemic issues, lessons learned and service improvements. Case reviews are conducted to learn from complaints which</p>

				<p>considers both internal and sector learning from Housing Ombudsman.</p> <p>Spotlight Reports.</p> <p>Complaints performance and learning reports are reviewed by Executive Management Team and provided to Housing and Communities Committee for assurance.</p>
9.2	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.29</li> <li>b. Case Reviews</li> <li>c. Monthly HoS complaint reports and bi-monthly meetings</li> <li>d. Staff training</li> </ul>	<p>Extract from policy:</p> <p><i>8.29 "Customer feedback from complaints is valuable to us and we will look beyond the circumstances of the individual tenant and use this as a source of intelligence to drive positive change, development, and improvement to our services."</i></p> <p>In-house complaint handling training (Nano e-learning) and Housing Ombudsman eLearning was undertaken with all employees and contractors in Q1 2024/25 to ensure</p>

				<p>customers are given the choice to make a complaint.</p> <p>HQN Training also provided in Q1 2024/25 to Complaint Investigators to ensure that they understand the requirements of the Complaint Handling Code.</p> <p>Case reviews are undertaken where there are more significant opportunities for learning and actions are identified and implemented. This can include learning from our own complaints and severe maladministration reports published by the Housing Ombudsman.</p>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to	Yes	<ul style="list-style-type: none"> <li>a. Policy 8.30</li> <li>b. Procedure 4.13 and 4.29</li> <li>c. Case Reviews</li> <li>d. Bi-monthly complaints meetings and</li> </ul>	<p>Extract from policy:</p> <p><i>8.30 "We will ensure that we are accountable and transparent in our complaint handling and will report on wider learning and improvements to our Board, the</i></p>

	<p>stakeholders, such as residents' panels, staff and relevant committees.</p>		<p>monthly HoS reports</p> <p>e. Quarterly complaints learning and improvement report</p> <p>f. Performance and Service Improvement Report</p>	<p><i>Housing and Communities Committee, the Housing Ombudsman and customers."</i></p> <p>Complaints performance, service improvements and the annual self-assessment of the Code is shared with InsightXChange (tenant forum) each year and outcomes reported via the Annual Report to Tenants.</p> <p>Head of Service reports outline the learning and service improvements from complaints, which they share within their teams.</p> <p>Bi-monthly learning from complaints meetings with Heads of Service and Senior Management highlight any trends in complaints, and the impact of service improvements on complaint volumes.</p>
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				Learning reports are reviewed by Executive Management Team and provided to Housing and Communities Committee for assurance.
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	a. Policy 9.1	<p>Policy 9.1 explains the Roles and responsibilities under this policy.</p> <p>Extract from policy:</p> <p><i>9.1 "The Director of Customer Experience and Insight is responsible for overseeing the implementation of this policy, including learning and improvement from complaints, and providing assurance to the HACC and Board on its effectiveness and compliance</i></p> <p><i>The Customer Experience Manager has responsibility for the overall implementation and monitoring of this policy, driving learning and improvement, and is the</i></p>

				<p><i>organisation's designated Complaints Officer."</i></p> <p>The specific responsibilities of the Member Responsible for Complaints are within the Chair of Housing and Communities Committee role profile.</p>
9.5	<p>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').</p>	Yes	a. Policy 9.1	<p>Policy 9.1 explains the Roles and responsibilities under this policy.</p> <p>Extract from Policy:</p> <p><i>9.1 "The MRC is also the Chair of Housing and Communities Committee and seeks assurance that complaint handling drives service improvement and learning and also champions a positive complaint handling culture."</i></p> <p>The specific responsibilities of the Member Responsible for Complaints are within the role</p>

				profile.
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	a. Policy 9.1	The complaints and case review learning report is reported to Housing and Communities Committee. The chair of this group is also the Member Responsible for Complaints.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: <ul style="list-style-type: none"> <li>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</li> <li>b. regular reviews of issues and trends arising from complaint handling;</li> <li>c. regular updates on the outcomes of the Ombudsman's</li> </ul>	Yes	<ul style="list-style-type: none"> <li>a. Policy 9.1 and 11.1 -11.2</li> <li>b. Performance and Service Improvement Report</li> </ul>	The complaints and case review learning report is reported to Housing and Communities Committee. The chair of this group is also the Member Responsible for Complaints. The annual complaints and service improvement report is reported to the Board.

	<p>investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>			
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments.</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p>	Yes	<p>a. Policy 3.1</p> <p>b. Bi-monthly Learning from Complaints Meetings with Heads of Service and monthly HoS reports</p> <p>c. Training – Housing Ombudsman training for complaint investigators</p> <p>d. HQN Training for all Complaint Investigator</p>	<p>The policy sets out guiding principles for complaints:</p> <p><i>3.1 “The principles of this policy are:</i></p> <ul style="list-style-type: none"> <li>• <b><i>Trust</i></b> - we put things right for customers to restore their trust</li> <li>• <b><i>Respect</i></b> – we take complaints seriously and treat people as individuals</li> <li>• <b><i>Innovate</i></b> – we find new solutions to improve services based on learning</li> <li>• <b><i>Working together</i></b> – we work with tenants and</li> </ul>



	c. act within the professional standards for engaging with complaints as set by any relevant professional body.		e. SkillXchange training for all staff	<p><i>partner organisations to positively resolve complaints, and we have a positive complaint handling culture"</i></p> <p>An additional value of 'Own It' has been introduced in our Plan A 2025-28</p>
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