# Appendix B: 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:  '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.'	Yes	<ul> <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: 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."
1.3	A resident does not have to use the word 'complaint' for it to	Yes	a. Policy 5.1 and Policy 5.2	Extract from policy: The customer does not have to use the word

be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.

- b. Complaints training records of understanding
- c. Records of service requests that did not become a complaint

'complaint' for it to be treated as such.

A complaint that is submitted via a third party or representative will still be handled in line with our complaints policy.

Training provided to employees on what is a complaint and was it a service request. This includes the complaints flow charts and case studies from HO guidance.

We actively monitor Service Request and review for quality purposes to ensure compliance with the code.

Nano Training and Housing Ombudsman E-Learning was undertaken with all employees and contractors in Q1 to ensure customers are given the

				choice to make a complaint.  HQN Training also provided in Q1 to Complaint Investigators to ensure that they understand the requirements of the complaint handling code.
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	Yes	a. Policy 4.1 and 8.5 b. Service requests dashboards	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 customer is not satisfied with the action taken, this becomes a complaint.

	must be recorded, monitored and reviewed regularly.			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.  The CX system logs service requests and complaints and dashboards have been implemented, so the Complaints Team can record, monitor, and review trends in service requests.
1.5	A complaint must be raised when the resident expresses dissatisfaction	Yes	a. Policy 8.5 b. CX system and dashboards	Extract from policy:  If further enquiries are  needed to resolve the  matter, or if the customer

				complaint handling code.
1.6	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.	Yes	a. Examples of customer satisfaction surveys	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.  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.

#### 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	a. Policy 5.4 b. Procedure c. CX system process d. Management assurance audits	Extract from policy:  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.
				The reason for not accepting a complaint is also logged in the CX system.  - Need to create a system where we can monitor refusals
				Management oversight and monitoring on reasons for not accepting a complaint is in place.
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	Yes	a. Policy 5.5 b. CX System c. Management assurance audits	Extract from policy:  Examples of where a complaint might not be opened include:  • A matter that has previously been fully investigated through the complaints process and a full written response was given, in
	must be fair and reasonable to residents. Acceptable			<ul> <li>line with this policy</li> <li>Something which happened, or which the customer knew of, more</li> </ul>

# exclusions include:

- The issue giving rise to the complaint occurred over twelve months ago.
- Legal
   proceedings
   have started.
   This is defined
   as details of
   the claim,
   such as the
   Claim Form
   and
   Particulars of
   Claim, having
   been filed at
   court.
- Matters that have previously been considered under the

- than twelve months before contacting us
- An issue where legal proceedings have started where the Claim Form and Particulars of Claim have been filed at court
- 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

The reason for not accepting a complaint is also logged in the CX system. In Q1 the system has been enhanced so we can monitor refusals.

	complaints policy.			Management oversight and monitoring on reasons for not accepting a complaint is in place.
2.3	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	Yes	a. Policy 5.5 b. Procedure c. CX System d. Management assurance audits	Extract from policy:  Something which happened, or which the customer knew of, more than twelve months before contacting us  5.4 - We use our discretion when considering opening complaints  The reason for not accepting a complaint is also logged in the CX system.  Management oversight and monitoring on reasons for not accepting a complaint is in place.

	good reasons to do so.			
2.4	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	Yes	a. Policy 5.4 b. CX System c. Managemen assurance audits	Extract from policy:  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.  The reason for not accepting a complaint is also logged in the CX system.  Management oversight and monitoring on reasons for not accepting a complaint is in place.

	landlord to take on the complaint.			
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	Extract from policy:  Exclusions  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.  Customer feedback from complaints is valuable to us and we will look beyond the circumstances of the individual tenant.

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> <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. Posters in other languages</li> </ul>	Extract from Policy  We will offer a range of options to give feedback including:  In person to any member of staff  Via telephone  In writing  Email  Website  Live Chat  Satisfaction Surveys  My Livin App  Social media (we will invite customers to direct message us to maintain confidentiality)  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 carer, other family member or a MP. This must be with the written consent of the complainant.
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	Yes	a. Policy 8.2 and 8.6 b. Training to staff, training records and confirmation of understanding	Extract from policy: We will offer a range of options to give feedback including: In person to any member of staff  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.  Nano Training and Housing Ombudsman E-Learning was

	person within the landlord.			undertaken with all employees and contractors in Q1 to ensure customers are given the choice to make a complaint.  HQN Training also provided in Q1 to Complaint Investigators to ensure that they understand the requirements of the complaint handling code.
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	Yes	a. Annual Report to Tenants b. Quarterly learning and case review report to Housing and Communities Committee c. Complaint KPIs d. Website pages on complaints and feedback e. Non-digital 'how to complain' examples	Complaint numbers have almost doubled from 22/23 - 23/24 which indicates that our complaint service is accessible. We do not set targets to keep complaints numbers down and we report on complaints trends and learning on a quarterly basis to Housing and Communities  Committee. The focus is on learning from complaints and improving services, not reducing complaint numbers.  Complaints data is published on Livin's website.

unable to complain.			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.  We provide information about 'how to complain' to tenants that are unable to access digital services.
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	Yes	a. Policy 8.3 and 8.39 b. Website c. Guide to giving feedback d. Easy read version of policy	Extract from policy:  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.  We are committed to the provision of seamless, responsive and convenient services and as such are a digital first organisation. We advocate encourage and support our tenants to engage with us via

published on the landlord's website.	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.
	The policy is published on website in both full and summarised/accessible versions: Our Policies   www.livin.co.uk
	ReciteMe, the Accessibility tool is available on the website and translation services are available.

				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.
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	a. Policy 8.40 b. Website	Extract from Policy:  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.  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.
3.6	Landlords must give residents the opportunity to have a representative deal with their	Yes	a. Policy 5.2 and 8.3 b. CX system process	Extract from policy: A complaint that is submitted via a third party or representative will still be handled in line with our complaints policy.

	complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.			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 carer, other family member or a MP. This must be with the written consent of the complainant.  The new CX process includes 'advocate details' to ensure the complaints team ask the customer if they require an advocate or representative.
3.7	Landlords must provide residents with information on their right to	Yes	a. Policy 5.4, 8.12, 8.18, 8.21 b. Quality assurance checks of	Extract from policy:  We will provide an explanation of this to the customer setting out the reasons why the matter is not suitable for the complaints process

access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	complaints communications including outcome letters c. Website d. Complaints Stage 1 and 2 Letters e. Emails to tenants from Complaints Team a. Annually in Rent Increase letters	and advising of the right to seek support from the Housing Ombudsman.  Stage 1 – 'The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed'.  Stage 2 - The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed.  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.  We also include the information on: Livin website Housing Ombudsman   www.livin.co.uk
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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	Yes	a. Policy 8.7 and 9.1 b. Performance and assurance reporting on complaints trends, learning and performance to Committee and Board	Extract from policy:  Complaints will be dealt with impartially and confidentially by a 'complaints officer' - Need to change as interpreted incorrectly.  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.  The policy includes roles and responsibilities of complaint handling including the role of Board and Housing and Communities Committee (HACC) in seeking assurance. Section 11 includes

	role may be in addition to other duties.			monitoring and review arrangements, these are:  - Quarterly performance reporting on Level 1 complaints measure and TSM's (Board)  - Annual Tenant Satisfaction Measure Perception survey (Board)  - Quarterly complaints learning and case review report (HACC)  - Customer Complaints and Feedback Report (Board)  - Performance and Service Improvement Report, including self-assessment against the Complaint Handling Code (Board)
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	Yes	a. Process b. Training records	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.  Employees have received training in eradicating stigma, handling distressed customers and are

authority an autonomy to act to resolv disputes promptly an fairly.	e 'e		required to resolve disputes quickly and fairly where possible within the complaints handling procedure.  HQN Training provided in Q1 to Complaint Investigators to ensure that they understand the requirements of the complaint handling code.
Landlords a expected to prioritise complaint handling an culture of learning fro complaints.  4.3  4.3  4.3  4.3  4.3  4.3  4.3  4	d a m All ff Yes ned of s nat are	<ul> <li>a. Process</li> <li>b. Training records</li> <li>c. Monthly     'Learning from     Complaints'     meetings with     Heads of     Service</li> </ul>	Complaint Training with all staff in June 2023.  Complaints Team share Housing Ombudsman cases and reports on our internal 'Learning Library' with all Service Managers  Monthly 'Learning from Complaints' meetings with Heads of Service  Nano Training 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.

service and must be resourced to handle complaints effectively	HQN Training also provided in Q1 to Complaint Investigators to ensure that they understand the requirements of the complaint handling code.
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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	a. Policy b. Website – complaints and feedback page	We have a single policy in place for handling complaints.  We state on our website that making a complaint does not affect the rights of a customer.  Training and culture work to ensure staff are treating all customers with respect and do not stigmatise if they have had a complaint.
5.2	The early and local resolution of issues	Yes	a. Policy 8.8	Extract from policy:

	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.			Our complaints procedure is made up of two stages.
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:  Our complaints procedure is made up of two stages.

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 Scope 5.3	Extract from policy:  This policy applies to all Board members, employees and partners/contractors working on behalf of Livin.  Partners/contractors are expected to adhere to our complaints policy, but they are not expected to undertake investigations, however they will assist the team to investigate and resolve an issue where required.
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' meetings	Partners/contractors do not carry out investigations but will be required to assist with service requests and the investigation/resolution of complaints where they are involved. Compliance checks completed by The Complaints Team to ensure

			complaints are handling in line with our policy and the Code.  Monthly meetings are held with Mears to share learning from complaints to progress actions and to resolve any issues relating to the resolution of complaints.
When a complaint is logged at S 1 or escalate Stage 2, landlords m set out their understand of the compand the outcomes the resident is seeking. The Code will reto this as "the complaint definition". I aspect of the complaint is seeking.	tage ed to nust r ling blaint Yes ne e fer ne f any ne	a. Policy 8.9 and 8.11 b. Quality checks of the investigation and outcome	Extract from policy:  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.  All points raised in the complaint definition will be addressed

	unclear, the resident must be asked for clarification.			
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	a. Policy 8.9 b. Quality checks of the investigation and outcome	Extract from policy:  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.  The complaint definition is confirmed by the Complaints Team during acknowledgement of a complaint and again by the complaint investigator.  Email template to send to tenants if not a complaint
5.8	At each stage of the complaints process, complaint handlers must:  a. deal with complaints on	Yes	<ul><li>a. Policy 8.10</li><li>b. Procedure</li><li>c. Quality checks of the investigation and outcome</li></ul>	Extract from policy:  The complaint will then be assigned to a complaints officer who will:  Deal with complaints on their merits, act independently, and have an open mind,

	their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.		d. Complaint handling satisfaction monitoring	<ul> <li>Give the customer a fair chance to set out their position,</li> <li>Take measures to address any actual or perceived conflict of interest; and</li> <li>Consider all relevant information and evidence carefully.</li> <li>Expectations aligned with the section of the Code are set out for Complaint Handlers in our Procedure for handling customer complaints and feedback. This procedure was updated in line with policy and code.</li> <li>Complaint check lists have been added to CX process, and to be completed on day 8 of investigation.</li> </ul>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord	Yes	a. Policy 8.12 b. Performance monitoring of complaints handled in timescales, both	Extract from policy:  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

	must agree with the resident suitable intervals for keeping them informed about their complaint.		internal and TSM metrics	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.
				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 reason. The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed.
				Performance metrics are monitored and reported. Complaints satisfaction and TSM's are reported quarterly to Board as part of the Performance Management Framework
5.10	Landlords must make reasonable	Yes	a. Policy 8.3	Extract from policy:  We will respond to reasonable

- b. Process to record adjustments
- c. Assurance monitoring that adjustments have been recorded and have been carried out

d. FVA

- 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 carer, other family member or a MP. This must be with the written consent of the complainant.
- An EIA of the policy sets out what reasonable adjustments Livin will make to ensure accessibility to all. The 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 Impact Assessments (EIAs), transactional feedback resident involvement/customer voice opportunities and scrutiny reviews. The EDI Policy is monitored via an Annual Equality, Diversity and Inclusion Monitoring Report submitted to the Housing and Communities Committee.

Required service adjustments are recorded on the complaint case and assurance checks are performed to make sure this is done and the adjustments are carried out.

We also have an EVA (Equality and Vulnerability Impact Assessment) to consider vulnerabilities beyond what might be contained within the protected characteristics.

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:  If all, or part of the complaint is not resolved to the customers satisfaction at Stage One, it will be escalated to Stage Two.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and	Yes	a. CX System b. Compliance checks	New complaint process implemented in 2023. All records and supporting documentation kept in CX system.  Compliance checks are undertaken to make sure everything is properly recorded in the system.  Documents to be set up in HO order

	the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			Complaint check lists have been added to CX process, and to be completed on day 8 of investigation.
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	Yes	a. Policy 8.13 b. CX System c. Complaints meetings and quarterly reporting	Extract from policy:  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.  An 'Action Tracker' process has been implemented within CX system to log and monitor outstanding actions for

	complaints process without the need for escalation.			the customer during, and after the complaint has closed.  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
5.14	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	Yes	a. Policy 8.24 b. Unacceptable Complainant Behaviour procedure	Extract from policy:  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.  The Complaints team log evidence to inform decision making and records are kept ensuring this is reviewed in line with the procedure.

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5.15 pi	Iny restrictions laced on ontact due to nacceptable ehaviour must be roportionate and emonstrate egard for the rovisions of the Equality Act 010.	Yes	a. Policy 8.26 b. Unacceptable Complainant Behaviour Policy. c. EVA	Extract from policy:  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 unacceptable behaviour will be proportionate and demonstrated in line with the Equality Act 2010 and our Inclusive Services Policy.

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,	Yes	a. Policy 8.9 b. Performance measures, monitoring, and reporting	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.  All complaints acknowledged within 5 working days, and 100% of complaints responded to in line with Housing Ombudsman code.  We have performance measures that cover the acknowledgement stage of complaints.

	and an explanation, apology or resolution provided to the resident.			
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure within five working days of the complaint being received.	Yes	a. Policy 8.9 b. Performance measures, monitoring and reporting	Extract from policy  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  CX systems reflect this to ensure compliance with the code.  Actions to further enhance: Create a new performance measure that covers the acknowledgement stage of complaints.
6.3	Landlords must issue a full response to stage	Yes	a. Policy 8.11 b. Performance Measures on	Extract from policy:

	1 complaints within 10 working days of the complaint being acknowledged.		complaints handled within ten days	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 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.  CX systems reflect this to ensure compliance with the code.
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	Yes	a. Policy 8.12 b. Performance measures	Extract from policy:  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

	extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.			Housing Ombudsman if an extension is needed.  We have performance measures to track this, one measure covers complaints resolved within the initial ten-day timescale and the other covers overall compliance with timescales set out in the Policy and the Code (currently 100%).
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	a. Policy 8.12 b. Template of email sent to customers	Extract from policy:  The customer will also be provided with the contact details of the Housing Ombudsman if an extension is needed.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when	Yes	a. Policy 8.13 b. Monthly complaint meetings and assurance reporting.	Extract from policy:  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.

	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.			Outstanding actions will be tracked, and the customer will be kept informed.  Outstanding actions are identified in closing letters and all actions logged and monitored on the CX system and through the monthly complaint meetings. Assurance on progress made with completing improvement actions is provided in quarterly complaints learning and case review reports.
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	Yes	a. Policy 8.11 b. Quality assurance checks on complaints investigations and outcome letters	Extract from policy:  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.

	where appropriate.			
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	Extract from policy:  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.

Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:  a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage	Yes	a. Policy. 8.11- 8.14 b. Procedure c. Quality assurance checks on complaints investigations and outcome letters d. Example of a closing letter	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  The closing letter is based on a template issued by the Housing Ombudsman Service as good practice.
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2 if the		
individual is not		
satisfied with		
the response.		

## 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	a. Policy 8.15 & 8.21 b. Procedure c. Quality assurance checks on complaints investigations and outcome letters	Extract from policy:  If all, or part of the complaint is not resolved to the customers satisfaction at Stage One, it will be escalated to Stage Two. We will acknowledge, define, and log the Stage Two complaint within five working days of the request being received.  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 advise if their complaint falls within its jurisdiction.
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	a. Policy 8.15 b. Procedure c. Performance measures, monitoring, and reporting d. Example of escalation request	Extract from policy  We will acknowledge, define, and log the Stage Two complaint within five working days of the request being received.  We have performance measures that cover the acknowledgement stage of complaints.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are	Yes	a. Policy 8.16 b. Procedure	Extract from policy:  They will review the handling and decision making at Stage One and make reasonable efforts to

	expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.			understand why the customer remains unhappy.
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	Extract from policy:  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.
6.14	Landlords must issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.	Yes	a. Policy 8.17 b. Procedure c. Performance monitoring and assurance reporting	Extract from policy:  The customer will be issued a full written response within 20 working days of the complaint being acknowledged.  We have a performance measure that covers the

				Stage 2 timescales of investigation.
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	a. Policy 8.18 b. Procedure c. Performance monitoring and assurance reporting on complaint handling timescales	Extract from policy:  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.
6.16	When an organisation informs a resident about an	Yes	a. Policy 8.18 b. Example of email to customer	As above

	extension to these timescales, they must be provided with the contact details of the Ombudsman.			
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	a. Policy 8.19 b. Monthly meetings and assurance reporting c. Screenshots of dashboard /cx d. Minutes from complaints meeting	Extract from policy:  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.  Outstanding actions for the customer are tracked within CX.  Monthly meetings track progress with any outstanding actions and

				assurance is provided to EMT and Housing and Communities Committee on progress against the overall actions.
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	a. Policy 8.17 b. Procedure c. Quality assurance checks on letters and investigations	Extract from Policy:  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.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:  a. the complaint stage;	Yes	<ul> <li>a. Policy 8.17</li> <li>b. Procedure</li> <li>c. Complaint letter template</li> <li>d. Quality assurance checks on letters and investigations</li> </ul>	Extract from Policy:  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

	b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			policy, law, and good practice where appropriate.  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  The closing letter is based on a template issued by the Housing Ombudsman Service as good practice.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed	Yes	a. Policy 8.21 b. Procedure	Extract from policy:  Stage 2 is our final response to the complaint. If the customer is not satisfied with the outcome

to issue such a response.	of the investigation at Stage 2, they can take their
	complaint to the Housing Ombudsman, who will advise if their complaint
	falls within its jurisdiction.

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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:  • Apologising;  • Acknowledging where things have gone wrong;  • Providing an explanation,	Yes	<ul> <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>	The Policy includes a section on learning from complaints (8.28-8.30) and compensation and remedies (8.32-8.36)  In Q1 24/25 Compensation Procedure was updated in line with HO remedies guidance.

	assistance or reasons;  Taking action if there has been delay;  Reconsidering or changing a decision;  Amending a record or adding a correction or addendum;  Providing a financial remedy;  Changing policies, procedures or practices.			
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 c. Compensation Procedure	Extract from Policy: 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 In Q1 24/25 Compensation 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	a. Complaint letter template b. Action tracker dashboard c. Quality assurance checks on letters and investigations	The complaint letter template includes a section on next steps taken to remedy the issues.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	a. Compensation Procedure	In Q1 24/25 Compensation Procedure was updated in line with HO remedies guidance.

Section 8: Self Assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:  a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.  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;	Yes	a. Performance and Service Improvement Report	This is a new requirement and we have not yet produced the report to the Housing Ombudsman. However we have a range of data and insight that will feed into the production of this report. The current available data and reports include:  • An annual selfassessment against the Complaint Handling Code is undertaken. This includes qualitative and quantitative analysis. • The Complaints, Compliments and Feedback Annual Report is reported to Board • Annual Report to Tenants • There is a range of performance measures to

	c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			monitor complaints. Monthly complaint meetings with relevant managers and Heads of Service happen to progress actions arising from complaints, to discuss case reviews and wider learning.  Quarterly case review learning reports are reported to Housing and Communities Committee.
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	Yes	a. Policy 11.1 b. Annual Report to Tenants c. Complaints, Compliments and Feedback	The Policy sets out a number of monitoring arrangements to ensure we are compliant with the Policy and the Complaint Handling Code. Examples of monitoring and assurance are:

	website relating to complaints. The governing body's response to the report must be published alongside this.		Annual Report d. Performance Measures	<ul> <li>Complaints, Compliments and Feedback Annual Report</li> <li>Annual Report to Tenants</li> <li>Performance Measures</li> </ul>
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 comply with any requests from 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	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

their website Landlords	
must provide a	
timescale for returning	
to compliance with the	
Code.	

## 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	a. Policy 8.29 – 8.30 b. Procedure c. Assurance reporting to Board and Housing and Communities Committee d. Case Reviews	Extract from Policy:  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.  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.

Trends are monitored for systemic issues, lessons learned and service improvements. A Case Review process has been implemented to learn from complaints which considers both internal and sector learning from Housing Ombudsman Spotlight Reports. Quarterly learning reports are reviewed by **Executive Management** Team and provided to Housing and Communities Committee for assurance.

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	a. Policy 2.19 and 8.29 b. Case Review Process c. Monthly complaints meetings d. Surveys to Complaint Investigators e. Staff training	Extract from policy:  Learn from complaints to improve outcomes for all customers  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.  In Q1 we surveyed all Complaint Investigators to ensure a positive complaint handling culture continues, and identify any gaps that improve the effectiveness of complaint handling.
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				Nano Training 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.  HQN Training also provided in Q1 to Complaint Investigators to ensure that they understand the requirements of the complaint handling code.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on	Yes	a. Policy 8.30 b. Procedure c. Case Review Process	Extract from policy:  We will ensure that we are accountable and transparent through our complaint handling and

wider learning and	٦	Monthly	will report back on wider
wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	e.	Monthly complaints meetings Quarterly complaints learning and improvement report Performance and Service Improvement Report	will report back on wider learning and improvements from complaints to relevant stakeholders and publish these for tenants.  Trends are monitored for systemic issues, lessons learned and service improvements. A Case Review process has been implemented to learn from complaints which considers both internal and sector learning from Housing Ombudsman Spotlight Reports. Quarterly learning reports are reviewed by Executive Management Team and provided to

				We report quarterly learning to the InsightXchange and routinely update the website with new learning.  Provide more regular updates on the website about complaints 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	a. Policy 9.1	Policy 9.1 explains the Roles and responsibilities under this policy.  Extract from policy:  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.  The Customer Experience Manager has responsibility for the overall implementation and monitoring of this policy, driving learning and improvement, and is the organisation's designated Complaints Officer.  We have included specific responsibilities of the Member Responsible for Complaints into the role profile.
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	Yes	a. Policy 9.1	Policy 9.1 explains the Roles and responsibilities under this policy.  Extract from Policy:

	handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').			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.  We have included specific responsibilities of the Member Responsible for Complaints into the role 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	Yes	b. Policy 9.1	The Quarterly 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 Director

	access to suitable information and staff to perform this role and report on their findings.			of Customer Experience and Insight presents this report to the Committee.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive:  a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;  b. regular reviews of issues and trends arising from complaint handling;  c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe	Yes	a. Policy 9.1 and 11.1 -11.2 b. Performance and Service Improvement Report	The Quarterly 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 Director of Customer Experience and Insight presents this report to the Committee.  The annual complaints and service improvement report will also be reported to the Board.

	maladministration findings; and d. annual complaints performance and service improvement report.			
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:  a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments.  b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and	Yes	<ul> <li>a. Policy 3.1</li> <li>b. Monthly Learning from Complaints Meetings with Heads of Service</li> <li>c. Training – Housing Ombudsman training for complaint investigators</li> <li>d. HQN Training for all Complaint Investigator</li> <li>e. SkillXChanges for all staff</li> </ul>	The policy sets out guiding principles for complaints: The principles of this policy are:  • Trust - we put things right for customers to restore their trust • Respect - we take complaints seriously and treat people as individuals • Innovate - we find new solutions to improve services based on learning • Working together - we have a positive complaint handling culture

c. act within the professional standards for engaging with complaints as set by any relevant professional body.

Training has been provided to staff in Q3 22/23 and further training in Q1 23/24. This included context of complaints being a positive learning mechanism to improve the Customer Experience for customers.

Nano Training and Housing Ombudsman E-Learning was undertaken with all employees and contractors in Q1 to ensure customers are given the choice to make a complaint.

HQN Training also provided in Q1 to Complaint Investigators to ensure that they understand the requirements of the

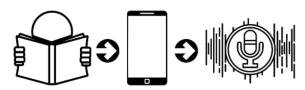
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