

## Self-Assessment Form

Code section	Code requirement	Comply: Yes/No	Category	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.</i>	Yes	Mandatory	Complaints policy and procedure contain the definition of a complaint as 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual or group of residents'.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Mandatory	Complaints policy - <i>We'll also accept a complaint made on a customer's behalf through an advocate, for example, from a friend, support worker, relative or MP. Where complaints are made through an advocate we will, where appropriate need to confirm this with the customer.</i>
1.6	...if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint	Yes	Mandatory	Complaints procedure (section 5.2) Clearly signposts to the Service Improvement team if we are unable to reach an agreement with the customer. A complaint will be logged, and a Complaint Lead will be assigned
1.7	A landlord must accept a complaint unless there is a valid reason not to do so	Yes	Mandatory	Complaints policy – section 2 This is clearly set out in Section 2 – complaints that fall outside of the policy scope. This section of our policy contains the full list of when a complaint will not be considered and available routes/signposting for customers to access
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents	Yes	Mandatory	Complaints policy – section 2 This is clearly set out in Section 2 – complaints that fall outside of the policy scope. This section of our policy contains the full list of when a complaint will not be considered and available routes/signposting for customers to access

1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	Mandatory	Complaints policy – section 2 The policy states “Where we cannot consider a complaint within our policy, we will explain why and offer advice or support to customers to try and help them resolve the issue”
1.4	Landlords should recognise the difference between a <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and not a <b>complaint</b> about the <b>service</b> they have/ have not received	Yes	Best practice recommended	Complaints policy – section 2 Excluded from the complaints policy are “service requests and complaints about issues that have occurred in the preceding 12 months, and we not previously notified to LiveWest”.  Section 2 of policy contains the following definition – “A service request is defined as a request from a customer that requires action to be taken to put something right. It will usually be the first time we have been contacted about an issue and have not previously had the opportunity to investigate the concerns and agree what action we will take to resolve the issue. A complaint will be raised if a customer remains dissatisfied with the response to their service request.”  This will include matters where customers are not happy with a situation and are asking us to confirm the actions we will take to resolve the situation. If a customer remains dissatisfied after receiving our response, a complaint will be raised. We recognise that some customers will immediately ask for a complaint to be raised even though we have not had an opportunity to set out our position.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Best practice recommended	All survey feedback is monitored by the Research and Insight team. Any comments made by a customer that require further review are passed to the appropriate team for investigation. In contacting the customer, appropriate advice and signposting will be provided.
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels,	Yes	Mandatory	Complaints policy – section 3 <ul style="list-style-type: none"> <li>• <i>We’re happy to accept all types of feedback to include complaints and compliments and comments verbally, in writing and via our social media platforms.</i></li> </ul>

	there must be more than one route of access into the complaints system.			<ul style="list-style-type: none"> <li>• <i>We'll also accept a complaint made on a customer's behalf through an advocate, for example, from a friend, support worker, relative or MP.</i></li> <li>• <i>We will treat complaints received through petitions in the same way as all other complaints. If it is helpful we are happy to meet the petitioners as a group. To manage the complaint effectively we will ask the group to nominate a single point of contact and we will work with this person to resolve the complaint.</i></li> </ul>
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding	Yes	Mandatory	<p>LiveWest homes website – Customers can access the policy document via our website.</p> <p>A link to the policy is also contained in the complaint acknowledgement letter. For customers who are unable to access digital channels, a printed version of the Complaints policy will be provided.</p>
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Mandatory	<p>A quick link to “Giving feedback” is contained on the website landing page.</p> <p><a href="https://www.livewest.co.uk/raising-compliments-and-complaints">https://www.livewest.co.uk/raising-compliments-and-complaints</a></p> <p>The policy is accessible from the Giving feedback page and can be located via the Search functionality.</p>
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaint handlers have had appropriate training to deal with such requests.	Yes	Mandatory	<p>We recognise that some people may find it difficult to access our complaints process and/or explain their concerns. The team will offer advice and support on submitting a complaint where required.</p> <p>Section 6 – “We will consider all requests for reasonable adjustments under the Equality Act 2010 and will implement adjustments where it is practicable to do so. We will share information in a way that meets the customers' individual needs.”</p> <p>We have a Vulnerable Customer policy.</p>

				<p>We have the accessible information standard - <a href="#">Accessible Information Standard.pdf</a></p> <p>We have an Equality, Diversity and Inclusion policy - <a href="#">EDI Strategy 2021-24 Approved 2021 08 12 FINAL.pdf</a></p> <p>Complaint handlers receive ongoing training and support to ensure that they can deal with requests for reasonable adjustments under the Equality Act.</p>
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	Mandatory	Regular information regarding how to raise a complaint, the Complaint Handling Code, Housing Ombudsman determinations and general Housing Ombudsman updates is provided to customers in e-newsletters, on the website, and in other correspondence sent to customers
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Mandatory	<p>Signposting to the Housing Ombudsman is contained in complaint acknowledgement and closure template letters. This provides contact information to the customer of how they can contact the Ombudsman Service at any time during their complaint.</p> <p>Regular Housing Ombudsman updates and contact information is provided to customers in e-newsletters</p>
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Mandatory	Signposting to the Housing Ombudsman is contained in complaint acknowledgement and closure template letters. This provides contact information to the customer of how they can contact the Ombudsman Service at any time during their complaint.
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.	Yes	Best practice recommended	<p>Complaints policy - <i>Complaints received via social media platforms will be directed via private messaging to enable us to maintain our customers confidentiality and privacy.</i></p> <p>Our Data Protection Compliance policy contains our policy statement and applies "to all Personal Data processed on our computer systems or stored in structured manual filing systems".</p>

3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This code will refer to that person or team as the “complaints officer”.	Yes	Mandatory	<p>Service Improvement team – We have a dedicated team of 11 Service Improvement Advocates and 1 team leader who manage complaints at LiveWest</p> <p>AfterCare team – We have a dedicated team who manage defects and development linked complaints.</p> <p>All LiveWest employees are aware of these teams and their roles and responsibilities.</p>
3.2	...the complaints handler appointed must have appropriate complaint handling skills and no conflicts of interest	Yes	Mandatory	<p>Complaints are dealt with by dedicated complaints advocates or by team leaders / managers. All will have appropriate complaint handling skills.</p> <p>All staff who deal with complaints are aware that any potential conflict of interest is immediately reported.</p> <p>The Service Improvement team will decide which business area and / or complaints officer is most appropriate to investigate a complaint.</p>
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• Be able to act sensitively and fairly</li> <li>• Be trained to handle complaints and deal with distressed and upset residents</li> <li>• Have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• Have the authority and autonomy to act to resolve disputes quickly and fairly</li> </ul>	Yes	Best practice recommended	<p>Service Improvement team – the Service Improvement team have full autonomy to resolve complaints and liaise with technical leads from the business to enable them to resolve complaints at the first point of contact with the customer or to work together with technical leads to help facilitate the resolution of more complex complaints.</p> <p>Service Improvement team – Hold regular individual department reviews of open complaints with supervisors, team leaders, managers and Heads of Service to resolve complaints quickly and effectively.</p> <p>The team also liaise with individual department technical experts to resolve complaints.</p> <p>The team also escalate concerns or complex complaints to the leadership team to help resolve disputes or complaint non-progression.</p>

4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a residents concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure <b>within five days of receipt.</b>	Yes	Mandatory	<p>All complaints are logged and progressed through the Housing software system, Cx. Case notes are added to the complaint to create an audit trail of decisions and actions taken.</p> <p>Customers are made aware of their right to ask for a complaint to be raised if they remain dissatisfied with our response and actions taken to resolve their concern.</p> <p>Policy document – Section 5 Documents our two-stage complaints process which includes: resolve complaints at the first point of contact where possible, formally record all complaints, steps taken to resolve complaints and the customer's right to ask for their complaint to be escalated to stage two if they remain dissatisfied with our response.</p> <p>Complaints policy – we will acknowledge all complaints within 24 hours of receipt. The Service Improvement team monitor all received complaints irrespective of channel and ensure that all complaints are logged and assigned to a Complaint Lead within 24 hours of receipt. <i>In most cases we will quickly be able to resolve customer concerns; in cases where we are not able to do this, we will treat the issue as a complaint. The Complaint Lead will investigate, liaise with relevant staff, and communicate with the customer to try and reach an immediate resolution (24 hours).</i></p>
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Mandatory	The stage one complaint acknowledgement template letter clearly details the scope of the complaint using bullet points where appropriate. In addition, the complaint acknowledgement letter details the outcome the customer is seeking.
4.6	A complaint investigation must be conducted in an impartial manner	Yes	Mandatory	All colleagues assigned a complaint have appropriate complaint handling skills. This will include the requirement to be impartial and to assess the complaint on its merits without bias or judgement.
4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> <li>• Deal with complaints on their merits</li> <li>• Act independently and have an open mind</li> </ul>	Yes	Mandatory	<p>Complaints procedure – section 5.5 The complaint lead is required to: <i>"The complaint investigation will consider all relevant information including reviewing what</i></p>

	<ul style="list-style-type: none"> <li>• Take measures to address any actual or perceived conflict of interest</li> <li>• Consider all information and evidence carefully</li> <li>• Keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>			<i>happened with colleagues involved, whether policies and procedures have been followed correctly, and whether services have been delivered to a reasonable standard.</i>
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	Mandatory	<p>We will liaise with the customer at the start of the complaint and agree method and frequency of complaint updates. This will consider the customers needs including any reasonable adjustments they require.</p> <p><i>Complaints procedure – section 5.4 Confirm and record the customers preferred method of communication and frequency of contact regarding complaint updates. Create system reminders to ensure communication plan is adhered to”</i></p>
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> <li>• Set out their position</li> <li>• Comment on any adverse findings before a final decision is made</li> </ul>	Yes	Mandatory	<p>As part of the complaint investigation, the Complaint Lead is required to liaise with colleagues regarding the concerns raised. The colleague will have the opportunity to set out their position and comment on any observations made.</p> <p>Where permissible to do so and having due regard to date protection and confidentiality, we do contact customers to understand all points of view before issuing a final complaint decision.</p>
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Mandatory	<p>Complaints policy - Section 5</p> <p>“Within 10 working days of receiving the stage 1 outcome letter, the customer is required to notify us of their intention to progress the complaint to stage 2 for a senior manager review. We recognise that there may be occasions where a customer may require additional escalation time for example a complex complaint or requested reasonable adjustments under the Equality Act. Where appropriate, we will extend the escalation timescale in agreement with the customer.”</p>

4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint	Yes	Mandatory	Complaint policy – section 5  “In cases where the customer’s preferred outcome is not permissible due to regulatory, statutory or legal reasons, and there are no concerns about our actual handling of the complaint at stage one, we can advise the customer that their complaint will not progress to stage two – this will then enable them to consider other options, including contacting the Housing Ombudsman if they choose without additional delays.”
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared	Yes	Mandatory	Service Improvement team – Utilise a shared outlook mailbox for customers to send in evidence, communications and updates on complaints. All advocates have access to the shared mailbox.  All emails, telephone conversations, and complaint correspondence are held together in Cx and the LiveWest document record centre. This enables us to have access to the details on the system for customers queries and updates and to evidence complaint handling.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint	Yes	Mandatory	We have a policy and procedure to manage unacceptable behaviour from customers which may include the volume, frequency and content of customers contact with us.
4.3	Landlords should manage residents’ expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	Best practice recommended	All complaints are initially triaged by the Customer Services team and /or the Service Improvement team. Both teams are fully aware of the Complaints policy, the exclusions, and can appropriately manage customers expectations around whether their desired outcome is achievable.  The stage one complaint acknowledgement letter clearly sets out the scope of the complaint to be investigated and the outcome the customer is seeking.  Complaints policy – section 5



				We will “Ask the customer what outcome they are seeking and be clear when an outcome is unreasonable or unrealistic”
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	Best practice recommended	Complaints policy - Section 5 <i>When a complaint is received we will:</i> <ul style="list-style-type: none"> <li>• Aim to resolve it at the first point of contact. If we’re not able to resolve it immediately, we will agree with the customer a suitable response time</li> <li>• Respond quickly, in a positive, understanding way</li> <li>• Listen and treat all customers with respect and courtesy</li> <li>• Investigate fully and ensure we address all relevant aspects</li> <li>• Ask the customer Ask the customer what outcome they are seeking and be clear when an outcome is unreasonable or unrealistic</li> <li>• Be clear about what we can and cannot do, managing expectations</li> <li>• Learn from it and use it to improve our services to customer</li> </ul>
4.5	Landlords should 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 where this is reasonable	Yes	Best practice recommended	Complaints policy – section 3 <i>We’ll also accept a complaint made on a customer’s behalf through an advocate, for example, from a friend, support worker, relative or MP. Where complaints are made through an advocate we will, where appropriate need to confirm this with the customer. All complaint information will be handled sensitively, telling only those who need to know and complying with relevant data protection requirements.</i>
4.8	Where a key issue of a complaint relates to the parties’ legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	Best practice recommended	We will provide appropriate advice and guidance to the customer regarding any legal obligations and this guidance will be clearly set out to the customer. We may confirm that the complaints process is not the right channel to investigate the customers concerns, or we may confirm that a complaint will be raised.  Complaints policy – section 2 Exclusions from complaints policy <i>Complaints in which court or tribunal proceedings are about to be issued or have been issued</i> <i>Liability, personal injury or other insurance claims;</i>

				<i>Complaints relating to decisions made by LiveWest in the allocation and management of our homes where existing appeals processes are in place</i>
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	Best practice recommended	Where reasonable to do so, we do not generally identify individual members of staff or contractors.
4.10	Landlords should keep residents regularly updated about the progress of their investigation	Yes	Best practice recommended	<p>Complaints policy – section 5  “When we receive a complaint, we will agree with the customer how they would like us to respond and how they would like to receive updates on the progress of the complaint. This may be by telephone, text, e-mail, face to face or in writing. Where complaints are made through social media chat forums, we will agree an appropriate way to respond and send a private message to the customer.”</p> <p>Service Improvement team – Our team are responsible for updating and communicating with our customers throughout the process. This is recorded in the system as a Cx communication, or a case note update.</p> <p>They will also be informed of any communication from technical leads, and these will be added / updated to the complaint.</p> <p>Tasks will be added to the complaint to ensure customers receive updates at agreed intervals.</p>
4.16	Landlords should seek feedback from residents in relation to the landlord’s complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	Best practice recommended	Complaints surveys are carried out on all stage one closed complaints. We ask a series of questions to understand the customer’s experience of our complaint handling along with how we can improve our overall service.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	Best practice recommended	We recognise the impact that being complained about can have on future service delivery. Our values and behaviours focus strongly on putting things right and implementing learning. We do not have a blame culture at LiveWest. We ensure that all colleagues understand the customer journey and what steps we collectively

				<p>need to take to improve performance, service delivery, and satisfaction.</p> <p>Only in a very small number of cases do we identify individual staff failings that require formal procedures under People Services policies. Where this occurs, we will follow the process ensuring that the staff member understands the reasons for formal investigations to be carried out and they have the right to be accompanied to any formal meetings.</p>
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard of the provisions of the Equality Act 2010	Yes	Best practice recommended	<p>An Equality Act assessment is carried out each time we place any restrictions on a customer's contact with us due to unacceptable behaviour.</p> <p>The assessment process to restrict contact will include: "Any customer needs or reasonable adjustments we should make under the equality act The Equality Act Assessment form can be used for the purpose of this assessment."</p>
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason	Yes	Mandatory	<p>Complaints policy – section 5</p> <p><i>Where we cannot do this the Complaint Lead will work with the relevant manager/team leader to resolve the complaint and formally respond to the customer within 5 working days. The response provided may be a full complaint response confirming the actions we have taken to resolve the issue or a complaint response confirming the actions we will take to investigate and resolve the issue. We recognise that some complaints may require detailed investigations, where this is the case we will discuss this with the customer and agree the timescale in which we will respond.</i></p> <p>The majority of customers will receive a response to their complaint within 5 working days setting out the actions we have taken / are proposing to take to put things right, the lessons we have learnt and any offer of compensation as per the compensation guidance.</p>
5.5	A complaint response must be sent to the resident when the answer to the complaint is known, not when the outstanding	Yes	Mandatory	Complaints procedure – section 5.6

	<p>actions required to address the issue, are completed. Outstanding actions must still be tracked and actioned expeditiously with regular updates provided to the resident</p>			<p><i>The Complaint Lead will, no later than the end of the fifth working day from receipt of complaint, complete the following:</i></p> <ul style="list-style-type: none"> <li>• <i>Provide a written response (using the complaint letter template) to each of the concerns raised as contained in the complaint acknowledgement scope. Response to confirm completed or planned actions and an explanation of any service failures</i></li> <li>• <i>Make arrangements for all actions agreed to be completed</i></li> <li>• <i>Add all outstanding actions and recommendations to the complaint action tracker</i></li> <li>• <i>Identify any learning points for service improvement</i></li> <li>• <i>Update the complaint record to show all outcomes and close the case</i></li> <li>• <i>If the customer is not happy with our recommendations the Complaint Lead is to advise the customer that they now have the option to escalate their complaint to stage 2 and include a deadline for escalation.</i></li> </ul> <p>Complaint template letters are available for the complaint lead to use which will communicate the response to the complaint and actions we are proposing to take to resolve.</p> <p>If the customer chooses to leave the complaint open while works are being carried out, the Service Improvement team will issue a final complaint outcome letter when the complaint is closed.</p> <p>Outstanding actions are entered onto a tracker by the Service Improvement team and are continuously monitored to ensure that the actions progress to agreed timescales.</p>
5.6	<p>Landlord must address all points raised in the complaint and provide clear reasons for any decision, referencing the relevant policy, law and good practice where appropriate</p>	Yes	Mandatory	<p>Complaints procedure – section 5.6</p> <p><i>At the end of the investigation the Complaint Lead will:</i></p> <ul style="list-style-type: none"> <li>• <i>Provide a written response (using the complaint letter template) to each of the concerns raised as contained in the complaint</i></li> </ul>

				acknowledgement scope. Response to confirm completed or planned actions and an explanation of any service failures  The complaint template outcome letter clearly requires all complaint leads to address every point of the complaint scope.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none"> <li>• The complaint stage</li> <li>• The decision on the complaint</li> <li>• The reasons for any decisions made</li> <li>• The details of any remedy offered to put things right</li> <li>• Details of any outstanding actions</li> <li>• Details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	Mandatory	The complaint outcome template letters cover all the points as detailed by the Complaint Handling Code
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances, where a landlord declines to escalate a complaint, it must clearly communicate in writing its reasons for not escalating as well as the residents right to approach the Ombudsman about its decision.	Yes	Mandatory	We will not decline a customer's request to escalate their complaint to stage two unless it meets one of the exclusion reasons or Section 5 of the Complaints policy.  <i>In cases where the customers preferred outcome is not permissible due to regulatory, statutory or legal reasons, and they don't otherwise have any concerns about our actual handling of the complaint at stage one we are able to advise the customer that their complaint will not progress to stage two – this will then enable them to consider other options, including contacting the Housing Ombudsman if they choose without additional delays.</i>  Complaint template letters include commentary around a customer's right to escalate their complaint to the Housing Ombudsman along with their contact details.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	Mandatory	The stage two acknowledgement letter covers all of the points raised in the Complaint Handling code including scope of complaint and the outcomes the customer is seeking. We will continue to liaise with the customer until we have a shared understanding of the reasons for escalating the complaint and the customers desired outcome.

5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident	Yes	Mandatory	Complaints that escalate to stage two will have been through one of the preceding processes – completion of stage one of the complaints process or completion of an appeal under a separate policy that is equivalent to stage one. An example of this is a customer appealing a decision under our Allocations policy. An appeal will be carried out which is equivalent to stage one of the complaints process. If the customer remains dissatisfied, their complaint will enter stage two of the complaints process.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Mandatory	An independent manager who has had no prior involvement in the matters raised by the customer will be appointed as Complaint Lead at stage two.
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	Mandatory	Complaints policy – section 5 <i>The timescales to respond will be agreed directly between the manager and the customer but will normally be no more than 7 working days from date of stage 2 complaint acknowledgement. If it will take longer than 7 working days, this must be agreed in advance with the customer and a full explanation provided.</i>  Stage two Complaint Leads are required to investigate and respond to the customer within 7 working days. Any extension to timescales will be communicated and agreed with the customer.
5.16	Landlord must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> <li>• The complaint stage</li> <li>• The complaint definition</li> <li>• The decision on the complaint</li> <li>• The reasons for any decisions made</li> <li>• The details of any remedy offered to put things right</li> <li>• Details of any outstanding actions</li> </ul> And <ul style="list-style-type: none"> <li>• If the landlord has a third stage, details of how to escalate the matter to stage three</li> </ul> If this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	Yes	Mandatory	All customers are updated on the proposed solution of the complaint via written letter. At the point where the Complaint Lead is considering closing the complaint, the customer will be asked if they are happy with the proposed outcome and if there is anything else we need to address, consider or respond to. This enables LiveWest to ensure that all customer requirements have been actioned and that the customer is happy to close the complaint.  The stage two complaint template letter covers all points raised in the Complaint Handling Code.  The LiveWest complaints policy operates a two-stage complaints process.

				All contact details for the Housing Ombudsman Service are included in the outcome letter for all stage two complaints. We inform customers of the details to contact the Ombudsman if they remain unhappy with the outcome of the stage two.
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	Mandatory	The LiveWest complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.  We have an independent senior manager review all stage two outcome letters before they are issued to customers to ensure that all possible resolution avenues and redress have been considered.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> <li>• The complaint stage</li> <li>• The complaint definition</li> <li>• The decision on the complaint</li> <li>• The reasons for any decisions made</li> <li>• The details of any remedy offered to put things right</li> <li>• Details of any outstanding actions</li> <li>• details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied</li> </ul>	Yes	Mandatory	Not applicable - The LiveWest complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties	Yes	Best practice recommended	Complaints policy – section 5 <i>Stage one - We recognise that some complaints may require detailed investigations, where this is the case, we will discuss this with the customer and agree the timescale in which we will respond. This will usually be no more than 20 working days from receipt of complaint. If an extension beyond 20 working days is required by us, we will agree this with you where practicable to do so.</i>
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Best practice recommended	The Housing Ombudsman contact details are provided at each stage of the complaint.

5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident	Yes	Best practice recommended	The Complaint Lead will assess all relevant information as part of their complaint investigation. This may include any older reports or witness statements that provide a rounded view of the issues and actions taken by the landlord to rectify and prevent reoccurrence.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	Best practice recommended	Complaints procedure – section 5.8 <i>In some cases the customer may raise other issues not directly in connection to the complaint during an investigation. These can be included in the complaint response but you should identify them separately</i>  We are clear with the customer about the best way to address any additional concerns that are raised during the complaint conversations. This may be to incorporate the additional points into the complaint response, or in discussion with the customer we may raise a separate stage one complaint.
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties	Yes	Best practice recommended	Complaints policy – section 5 <i>The timescales to respond will be agreed directly between the manager and the customer but will normally be no more than 7 working days from date of stage 2 complaint acknowledgement. If it will take longer than 7 working days, this must be agreed in advance with the customer and a full explanation provided.</i>
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Best practice recommended	The Housing Ombudsman contact details are provided at each stage of the complaint.
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b>within 20 working days</b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An	Yes	Best practice recommended	Not applicable - The LiveWest complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.



	explanation and a date for when the stage three response will be received should be provided to the resident			
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	Best practice recommended	Not applicable - The LiveWest complaints policy is in line with recommendations made by the Housing Ombudsman, and we operate a two-stage complaints process.
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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	Yes	Mandatory	<p>Service Improvement team – The team have the authority to put actions in place to put things right.</p> <p>The complaint closure letters clearly require the complaint handler to confirm the actions taken to put things right and any outstanding actions that are required.</p> <p>The team have agreed processes they follow including a compensation guide, action tracker, learnings, and training feedback that can be shared with colleagues. We also share the spotlight reports from the Housing Ombudsman to ensure that we consider the recommendations put forward and implement where reasonable and practicable to do so.</p>
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents	Yes	Mandatory	<p>All colleagues are aware of the compensation guidance which includes both statutory and discretionary compensation.</p> <p>The compensation table reflects the possible levels of impact to the customer and offers appropriate remedies depending on the level and frequency of service failure and the detriment and inconvenience caused to the customer.</p>
6.5	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 following through to completion.	Yes	Mandatory	The complaint template letters include a section for compensation which asks the Complaint Lead to detail the level of compensation and for what issue, and the level of financial payment offered. The letter will also set out how the payment will be made and by when. We do not hold customers bank details so for every compensation offer, the customer will be required to supply their bank details in a safe and secure way to effect payment.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have	Yes	Mandatory	The compensation guidance provides guidance on all statutory payments that may be due to the customer.

	been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused			<p>The compensation guidance provides advice on quantifiable losses.</p> <p>The Compensation guidance also includes advice on considering distress and inconvenience caused to the customer and the possible impact this has had on them.</p> <p>The Complaints policy – section 2 – does confirm that any “Liability, personal injury or other insurance claims” are best dealt with by our Insurers outside of the complaints process. However, any complaint regarding service failure can be progressed through the complaints process.</p>
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be ‘put right’ in terms of process or systems to the benefit of all residents	Yes	Best practice recommended	<p>Complaints policy – section 9</p> <p><i>We will have systems in place which enable us to record and analyse data from complaints, compliments and feedback. We will use complaints, compliments and feedback as opportunities to learn and improve our services. We will identify the causes of service failure and use this insight to address the underlying issues and improve services. We will use the compliments and positive feedback we receive from customers to help us understand what is important and inform future service design. Once a complaint is closed we will contact customers to ask for their views on the handling and outcome. We will use this insight to improve our complaints process.</i></p>
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	Best practice recommended	Where relevant, the Service Improvement team and / or Complaint Lead will seek legal advice on matters regarding any legal entitlement to redress.
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels	Yes	Mandatory	<p>We provide additional information and details of our complaint performance in our quarterly performance report for customers and customer annual report.</p> <p>We have a complaint communication framework that provides regular updates to customers via the website and newsletters covering the following aspects of the complaints process and learning:</p>

				<ul style="list-style-type: none"> <li>regularly publicising lessons learnt</li> <li>articles of specific interest</li> <li>publicising in summary the outcome of complaints referred to the Housing Ombudsman and the actions / learning we have taken</li> <li>Website 'you said, we are doing' section</li> </ul>
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	No	Best practice recommended	<p>At this time, we are not proposing to identify a member of the governing body to have lead responsibility for complaints.</p> <p>The Executive Director for Operations oversees complaint handling performance and receives regular updates on volume, trends, satisfaction, complaint management and complaint learning.</p> <p>The governing body receives a written overview of any Ombudsman maladministration determinations including agreeing actions to improve service delivery.</p> <p>The governing body receives 6-monthly updates on complaints which detail volume, trends, satisfaction, learning and action plans.</p> <p>When changes to Consumer Regulation come into force, we will be required to identify a senior person responsible for ensuring we comply with the consumer standards. The Regulator will introduce this measure as part of a broader requirement for landlords to provide greater clarity on the roles and responsibilities of senior level staff. Complaint handling performance forms part of the consumer standards. Once appointed, this person will have lead responsibility for complaints and ensuring that the governing body receives regular complaint information.</p>
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> </ul>	Yes	Best practice recommended	<p>The governing body receives:</p> <ul style="list-style-type: none"> <li>6-monthly reports on complaints including volume, trends, satisfaction, learning and action plans to improve complaint handling</li> <li>Housing Ombudsman sector updates including spotlight reports and the annual performance report</li> </ul>

	<ul style="list-style-type: none"> <li>regular reviews of issues and trends arising from complaint handling</li> <li>the annual performance report produced by the Ombudsman, where applicable</li> <li>individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling code for scrutiny and challenge</li> </ul>			<ul style="list-style-type: none"> <li>a report on any complaint case outcome which determines maladministration (not including service failure) has been identified. The report will detail the findings and recommendations of the Ombudsman and steps we will take to rectify and prevent reoccurrence.</li> </ul>
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	Best practice recommended	<p>Trends and themes are used to inform individual, team and company-wide training. This will include technical complaint process training and dedicated customer service skills training.</p> <p>Senior management receive regular reports detailing complaint themes and trends including actions we need to take to mitigate any risks, or amend policies and procedures.</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> <li>have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>act within the Professional Standards for engaging with complaints as set by the Chartered Institute for Housing</li> </ul>	No	Best practice recommended	<p>Performance management is being reviewed to support cultural change and ensure that performance and behaviours are appropriately reviewed, clearly defined, and monitored.</p> <p>As part of the development of a Performance Review system, we will consider objectives centred on working collaboratively with colleagues, focus on solutions rather than problems and to always maintain integrity and customer focus.</p> <p>We offer employees the opportunity to study for CIH and ICS qualifications that align to the Professional Standards as set by the Chartered Institute for Housing.</p>
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements	Yes	Mandatory	An annual self-assessment against the Code is carried out and reported to the governing body, scrutiny group and wider customers via the website and newsletters.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures	Yes	Mandatory	A self-assessment will be carried out following a significant restructure and / or change in procedure

8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> <li>• report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be report to elected members</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaint handling performance</li> </ul>	Yes	Mandatory	<p>When a self-assessment is carried out, it will be reported to the governing body for discussion and approval.</p> <p>The outcome of the assessment will be made available on the website for customers to review and access. We will also share the outcome to customers via newsletters.</p> <p>Information on complaint volume, trends and themes is included in the annual report.</p>
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