

Self-Assessment of Complaints

Livv Housing Group December 2020



At Livv Housing Group we take our customer's opinions seriously when it comes to developing and shaping our policies that have a direct impact on them. We have worked closely with our customers this year to simplify and make changes to our Complaints & Compliments Policy, which was launched on 10th August 2020. The changes we have made make it easier for our customers to tell us when we have not met their expectations as well as when we've done a great job for them.

The new policy also includes the requirements outlined by the Housing Ombudsman in the Complaint Handling Code (2020), which was launched in July. This Code requires Housing Associations to publish their initial self-assessment of performance against the new standards, by 31st December 2020. The assessment of our performance is detailed later in this report and is based on the learning we have taken from complaints received from the point at which we launched our new policy through to 30th November 2020.

We will publish a further end of year assessment in May 2021 and this will be followed by quarterly performance updates and a full annual report each year detailing the learning we have taken and how we have used this to shape our services in line with what our customers want. This is in line with requirements of the Code, which requires us to assess the approach and timeframes that will provide the most insight.

The format of the report is outlined by the Housing Ombudsman and this paper follows the format set out. We will compliment this paper with an abridged version which gives some clear insight to our customers about our performance and progress.

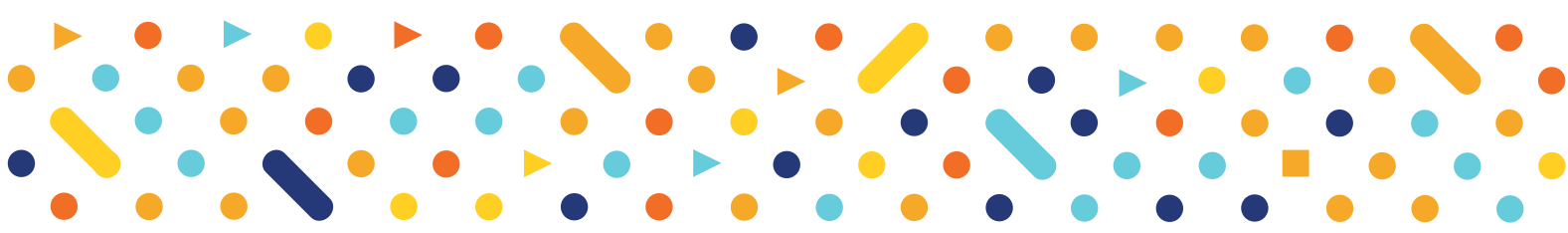
If you have any questions regarding the self-assessment, please email to feedback@livvhousinggroup.com

1. Definition of a complaint

Does the complaints process use the following definition of a complaint?

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.

Yes, under section 5.2 of our policy, we say, "We adopt The Housing Ombudsman's 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 customer or group of customers."



Does the policy have exclusions where a complaint will not be considered?

We have a small number of instances where a complaint will not be considered; these are detailed in section 8 of our policy. If we do not accept the complaint, then we will always explain why this is and direct them to the body, organisation or department who can assist them. Our exclusions are listed below; taken directly from our policy.

8. When we will not investigate a complaint

8.1 We recognise that sometimes our service failures will upset customers and they may be angry, frustrated or upset. Our staff are trained and supported to deal with all customers in a respectful way and we want our customers to treat us in the same way. If a customer behaves in a way which could be considered inappropriate, abusive, where harassment occurs or in any instance where our member of staff feels uncomfortable dealing with the customer's behaviour, we may not be able to investigate the complaint. All of our calls are recorded for training purposes and cases like this will be reviewed by a manager who will write to the customer setting out their findings and explaining the decision and implications for the complaint after listening to the call.

8.2 In cases of extreme aggression or abusive behaviour we may additionally refer the matter to the Serious Threat Assessment Group (STAG). STAG deal with unacceptable behaviour towards employees, contractors, or partners. If appropriate the incident will also be referred to the relevant authorities, including the Police. Livv Housing Group will inform the complainant of what action has been taken and why.

8.3 There will be times when we feel that a complaint is unreasonable, based on its content, where we have received a high level of unsubstantiated complaints or where the frequency of their individual contact with Livv Housing Group could hinder our consideration of their, or other people's complaints. On these very rare occasions, we will be unable to investigate your complaint, explaining our reasons to you in writing,

8.4 Where a customer's complaint relates to an active insurance claim, this is out of scope of our Complaints Policy and will be managed by our insurers who will contact the customer directly.

8.5 Complaints relating to another service provider that is not a sub-contractor of Livv Housing Group cannot be investigated and will need to be directed to the relevant provider – e.g. any complaints about services delivered by the local authority such as bin collections, or a utility supplier such as a power cut.

8.6 Issues that are subject to legal action or proceedings are out of scope for this policy and will be managed by the solicitor appointed to act on our behalf. This would include Disrepair cases where there is a specific process in place.



Are these exclusions reasonable and fair to residents?

We have tried to reduce and simplify the instances where we feel it is reasonable and fair to refuse to investigate a customer complaint, in line with one of our brand values of being “positively open.” (we are open to feedback at all times, as we strive to deliver a first-class customer experience). We see the likelihood of a complaint being refused being an absolute exception and in the reporting period considered there have been no cases where a complaint has been refused.

Evidence relied upon

Ahead of making changes to our Complaints and Compliments Policy, we talked with customers who had recently made a complaint to better understand the service they had received and where we could make improvements. The overwhelming feedback was to simplify our policy and the same customers were recontacted with the new policy in draft form; incorporating their recommendations. This included our exclusions outlined.

Alongside customer feedback, we have looked to compare the approach set out in our policy with that of other companies who we would consider to be service providers from within and outside of the sector. This focused on ensuring that the tone around exclusions was consistent with what is positioned elsewhere and that our policy was suitably welcoming of complaints as a means of improving service.

2. Accessibility

Are multiple accessibility routes available for residents to make a complaint?

Section 5.1 of our Policy confirms that “We welcome complaints made to us through all routes, including those raised with employees over the phone or face-to-face, by way of written letters or emails, using the internet, web chat, Livv Online and social media, or by advocates or other people who are authorised to act on a customer’s behalf.”

Is the complaints policy and procedure available online?

The complaints policy is available online via

<https://livvhousinggroup.com/wp-content/uploads/2020/08/Complaints-Policy-2020-2023.pdf>

Do we have a reasonable adjustments policy?

We are committed to providing fair and equal services to customers and to ensure that:

- The complaints service is accessible to all.
- Complaints are dealt with fairly and consistently.

To comply with the Equality Act 2010, an Equality Analysis (EA) was completed as part of the Policy review. Upon completing the EA, it was found that the implementation of the Policy would support and encourage the aims of the public sector duty. The equality analysis was completed and approved June 2020.



Do we regularly advise residents about our complaints process?

Complaints performance and learning from complaints feature regularly in our customer magazine, are shared in our Annual Report and feature on a dedicated “You said, we did” page on the Livv website <https://livvhousinggroup.com/get-involved/you-said>. Additionally, our newly formed customer scrutiny and assurance group, the Quality and Improvement Panel will review our complaints performance at the end of each financial year.

3. Complaints team and process

Is there a complaint officer or equivalent in post?

A full-time Customer Feedback Advisor manages all complaints for Livv Housing Group, reporting through to the Head of Customer Engagement.

Does the complaint officer have autonomy to resolve complaints?

The Customer Feedback Advisor is independent of all operational functions and oversees the investigation of complaints across the organisation. The relevant business area takes ownership of individual complaints about their service and the Customer Feedback Advisor ensures that their investigation is undertaken in a thorough and timely manner. The Customer Feedback Advisor involves our Directors and Executive Team in complex cases, where necessary, to ensure resolution is achieved for the customer. Where a complaint is not about a specific service area, the Customer Feedback Advisor takes full ownership through to resolution.

Does the complaint officer have authority to compel engagement from other departments to resolve disputes?

The Customer Feedback Advisor assigns primary ownership of the complaint to the main service area listed in the complaint; discussing cases on a daily basis with service managers, to ensure that appropriate engagement is taking place across the organisation. If, for any reason, there are internal blockages, the Customer Feedback Advisor will intervene, to ensure these are either overcome or escalated internally, as appropriate; this includes with our senior leadership team.

If there is a third stage to the complaint's procedure are residents involved in the decision making?

Livv Housing Group operate a two-stage complaint's procedure as recommended by the Housing Ombudsman; there is no third stage.

Is any third stage optional for residents?

N/A



Does the final stage response set out residents' right to refer the matter to the Housing Ombudsman Service?

All final responses to customers outline their rights to escalate to the Housing Ombudsman; this is templated and is shown below from a complaint response.

"This Stage two review concludes Livv Housing's internal complaints process.

If we have been unable to resolve the issue to your satisfaction, you can seek advice from a "designated person", such as an MP or local councillor, or refer the matter directly to the Housing Ombudsman which, according to the Housing Ombudsman's protocols, can be done after eight weeks have lapsed since exhausting the Livv Housing Group complaints process.

Their address is:

Exchange Tower, Harbour Exchange Square, London E14 9GE. If you have any further questions, please do not hesitate to contact myself on 0151-290-7000."

Do we keep a record of complaint correspondence including correspondence from the resident?

All complaints correspondence is recorded including records of contact with the customer, within our housing management system, Orchard.

At what stage are most complaints resolved?

97.6% of all complaints received from 10th August 20 were resolved at Stage 1, with just three escalations to Stage 2 over the same period.

4. Communication

Are residents kept informed and updated during the complaints process?

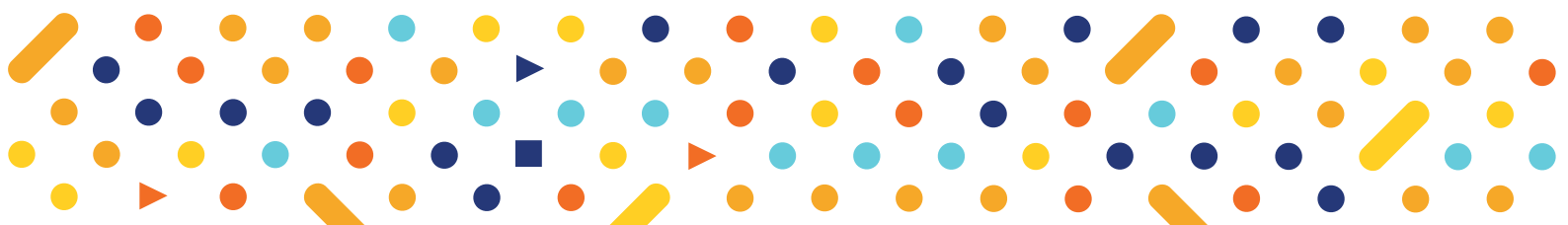
Yes, all customers are contacted within 1 working day of their complaint being received, by the Customer Feedback Advisor. Further updates; their means and frequency are agreed at the outset, with the aim of full resolution and a written response within 10 working days.

Are residents informed of the landlord's position and given a chance to respond and challenge any area of dispute before the final decision?

The complaint outcome should never be a surprise to our customer, as the dialogue established during the complaints process continues through until resolution, even when we are not upholding a complaint. This allows customers to respond and challenge our position at each stage of the complaints process; ahead of the outcome letter.

Are all complaints acknowledged and logged within five days?

All complaints are acknowledged within one working day of receipt; this is one of the complaints measures we track and report in our risk management system.



Are residents advised of how to escalate at the end of each stage?

Yes, all complaint outcome letters include escalation rights to the next stage and Ombudsman; including timeframes for customers.

What proportion of complaints are resolved at stage one?

97.6% of all complaints received from 10th August 2020 were resolved at stage one.

What proportion of complaints are resolved at stage two?

2.4% of all complaints received from 10th August 2020 were resolved at stage two.

What proportion of complaint responses are sent within Code timescales?

- Stage one – 80.5% (99 of 123)
- Stage one (with extension) – 16.3% (20 of 123)
- Stage two – 66.7% (2 of 3)
- Stage two (with extension) – 33.3% (1 of 3)

There were four Stage one complaints that exceeded the maximum permitted days (with extension) – two were customer-led because of COVID-19 self-isolation, one we were repeatedly unable gain access to a customer's home and had to close without resolution and one was a particularly complex case; again with contact difficulties.

These results have been achieved in a short reporting timeframe and continuous improvement is assured through weekly reporting at an Executive level and from checkpoints and escalations, where necessary; additionally on days 1 and 4 of an investigation and then on a daily basis from day 8 onwards.

Where timescales have been extended did we have good reason?

We are continually working to improve the proportion of complaints resolved without extended timescales and have seen significant positive progress however, of the 25 cases outside timescales in the review period, a review has identified that there were opportunities to do better in 18 of these. This is largely a historical cultural issue from September, when 16 cases should have been resolved more quickly for our customers. Operational processes and identified single points of failure were the root cause and have been changed and removed

Where timescales have been extended did we keep the resident informed?

Yes, in all cases we apologised for the delay, explained the rationale and gave clear timescales for when they could expect the matter to be resolved.



What proportion of complaints do we resolve to residents' satisfaction?

Livv Housing Group use an SMS feedback solution, Rant & Rave to record satisfaction with how complaints have been handled. During the timeframe of review, 26 customers replied to our satisfaction question and 12 of these were fully satisfied, giving a score of 46.2%. This is measured against an aspirational target of 60%, which would be in the top quarter of all customer service providers, when achieved. It shows our ambition to continually improve and be recognised by customers for doing so.

5. Cooperation with Housing Ombudsman Service

Were all requests for evidence responded to within 15 days?

Yes, four requests for information were logged during the review timeframe and all were responded to within 15 days.

Where the timescale was extended did we keep the Ombudsman informed?

N/A

6. Fairness in complaint handling

Are residents able to complain via a representative throughout?

If our customer has given their permission, we are happy to deal with a representative at any stage of our complaints process; this is detailed in section 5.1 of our Complaints and Compliments Policy:-

"We welcome complaints made to us through all routes, including those raised with employees over the phone or face-to-face, by way of written letters or emails, using the internet, web chat, Livv Online and social media, or by advocates or other people who are authorised to act on a customer's behalf."

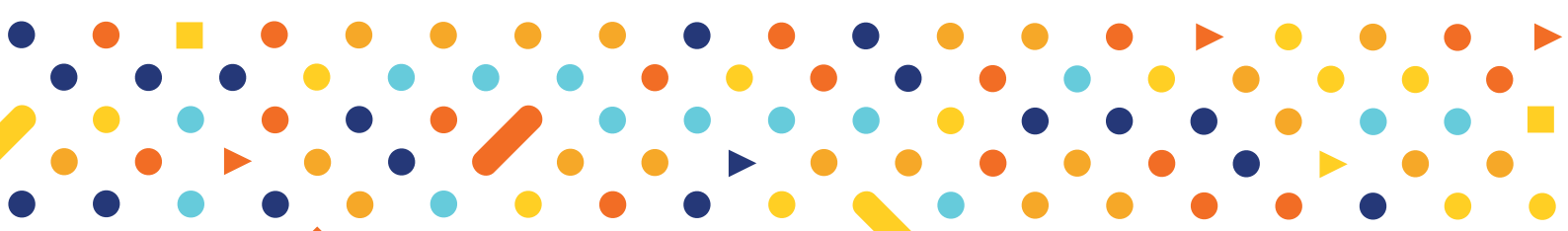
In practice, representatives have included community groups, resident associations, elected officials, friends and family members; all to good effect.

If advice was given, was this accurate and easy to understand?

Our aim is to reply in language that is easy to understand and in line with our brand values, which are focused on Plain English and clear communication. We aim to ensure that our written responses are evidence based, factual and clearly set out the rationale for any decisions. We continually keep customers updated throughout our investigations, which means that the final letter becomes confirmation of what we have already discussed with them and there are no surprises.

How many cases did we refuse to escalate?

We have not refused the escalation of any complaints in the review period.



What was the reason for the refusal?

N/A

Did we explain our decision to the resident?

N/A

7. Outcomes and remedies

Where something has gone wrong are we taking appropriate steps to put things right?

We always seek to resolve the situation for our customer and then look beyond the circumstances of the individual complaint and consider whether systems or processes need amending for the benefit of all customers. This forms part of our regular reporting and planning process.

8. Continuous learning and improvement

What improvements have we made as a result of learning from complaints?

We have made several changes, directly because of learning from both complaints and our customer feedback solution, Rant & Rave. Full details can be found on our website - <https://livvhousinggroup.com/get-involved/you-said/>

In summary, we have made changes to some of our letters, how we contact customers via SMS, relocated some communal bins, extended our opening hours to help customers in financial difficulty, reclassified all heating and hot water repairs as emergencies, changed the way we make goodwill payments to customers and made changes to street cleaning and traffic management at our new Watchfactory development.

How do we share these lessons with:

a) residents?

Learnings from complaints are shared in detail on our website - <https://livvhousinggroup.com/get-involved/you-said/> - with additional ad hoc articles in our customer "Livving" magazine, Complaints performance features in our Annual Report, available on our website. Where individual complaints lead to changes, we keep customers abreast of how we have improved our service because of their feedback.



b) the board/governing body?

Our Customer Services Committee have accountability for complaints; they are an integral part of our Customer Engagement Strategy, approved by them in March 2020. Complaints performance is discussed at each meeting, with a 2019/2020 annual summary agreed in April 2020, our performance against the Regulator of Social Housing's Consumer Standards (these include complaints) in July 2020 and in greater detail, showing our compliance with the new Housing Ombudsman's Complaint Handling Code, in Nov 2020. This document has been approved by our Customer Services Committee, prior to publication.

c) In the Annual Report?

Yes, complaints performance features in our Annual Report, available on our website.

<https://livvhousinggroup.com/annualreport>

Has the Code made a difference to how we respond to complaints?

For Livv, the Code complemented the significant improvements to complaint handling and learning from complaints we had already made this year, as part of our Customer Engagement Strategy, approved in March 2020. We had already consulted with our customers about changes to our Complaints and Compliments Policy and approved our new, simplified approach on 10th August 2020, compliant to and within a month of publication of the Code.

Our focus remains on ensuring that complaints are thoroughly investigated and resolved within the mandated timeframes; ensuring a responsive service for our customers. The Code has given us added assurance that our approach is correct.

What changes have we made?

Our operational focus on the time taken to resolve complaints has intensified throughout the organisation, with new weekly and monthly reporting at an Executive level on our performance and hands on support and intervention for complex complaints, where timeframes look challenged. Our risk management reporting system has been updated with metrics showing our compliance against the Code.

