

Self-Assessment of Complaints

Livv Housing Group December 2021



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 worked closely with our customers 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.

Our policy also includes the requirements outlined by the Housing Ombudsman in the Complaint Handling Code (2020). We published our first self-assessment in line with the requirements in December 2020 and this self-assessment builds on that report to detail our progress and compliance with the Code.

We plan to update this assessment with the end of year position as at 31st March 2022, which will be followed by a full annual report each year end detailing the learning we have taken and how we have used this to shape our services in line with what our customers say is important to them. This is in line with requirements of the Code, which requires us to assess the approach and timeframes that will provide the most insight.

Livv has further invested in our complaints handling, as part of a wider investment in our customer service offer, through a dedicated team that has been in place since July 2021. This commitment ensures that Livv customers can expect to experience a consistent and high quality effective complaints service in line with our Complaints Policy and the Housing Ombudsman Complaint Handling Code.

We have experienced an increase in customer demand since the restrictions put in place as a result of the pandemic have been lifted. This is primarily due to an increased demand in responsive repairs, which has been experienced across the sector. Housing Associations in the Liverpool City Region have shown similar trends in demand for repairs. Our customer contact centre, being the first point of contact, have been most impacted as have the repairs service. This has stretched our resources and made contacting us more challenging for customers. As a result, we've seen a short term increase in the number of complaints received in September.

Our commitment to providing the best service possible to our customers is unwavering and we have used our communications channels to direct customers to the quieter times in the day to call us. We've seen a drop in service that we've worked hard to address quickly. We've responded by realigning resources and capacity as well recruiting more staff into responsive repairs, our contact centre and our complaints team, which will improve response times and get us back on track delivering great service to our customers.

Our self assessment against the Housing Ombudsman Code follows. If you have any questions or feedback regarding this, please email to feedback@livvhousinggroup.com or write to Customer Feedback team, Livv Housing Group, Lakeview, Kings Business Park, Prescot, L34 1PJ.



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, our policy states in Section 4, "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?

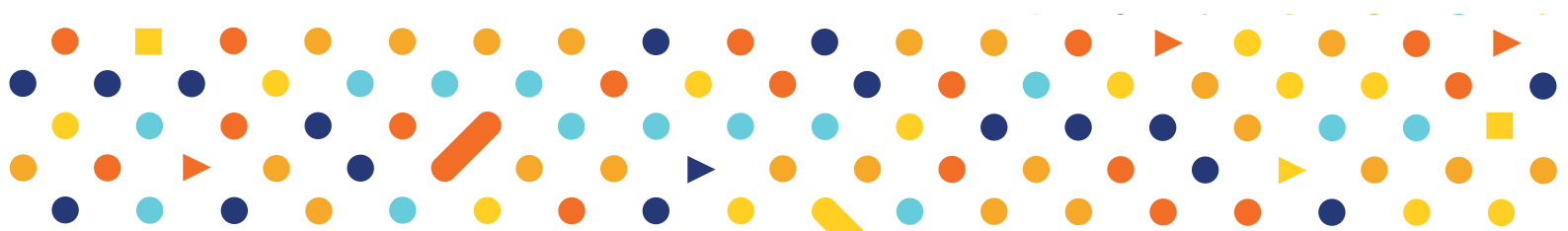
We have a small number of instances where a complaint can not be considered; these are detailed in Section 4 of our policy statement and are restricted to where the complaint relates to issues relating to ongoing legal action or insurance claim, where the complaint relates to another service provider that is not under contract with Livv or where the complaint is considered unreasonable or could hinder our investigation of other people's complaints. These are rare occasions where these exclusions would apply and when we take a decision that we will not accept the complaint, we will always explain why this is and direct them to the relevant body, organisation or department who can assist them. The full detail of the exclusions are listed below; taken directly from our policy.

When we will not investigate a complaint

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.

In cases of extreme aggression or abusive behaviour we may additionally refer the matter, if appropriate, to the relevant authorities, including the Police. Livv Housing Group will inform the complainant of what action has been taken and why.

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,



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.

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.

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” and appreciate that the best people to tell us how well we are doing or where we could improve are our customers. We aim to be open to feedback at all times and consciously seek it where we think we can do better as part of our customer engagement programme. Complaints is a key feedback channel for us 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 4 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 Customer Services Committee, which is a committee of the Group Board, reviews our complaints performance quarterly with a full review at the end of each financial year.

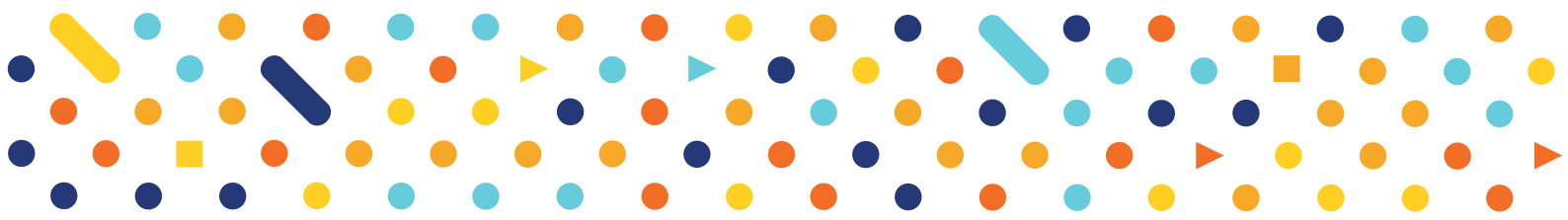
3. Complaints team and process

Is there a complaint officer or equivalent in post?

We have a dedicated Complex Queries and Complaints team who co-ordinate the complaints process to ensure a detailed and consistent approach to complaint handling is taken across Livv Housing. This team is led by a manager who has operational oversight of both the process and in terms of ensuring quality responses to complaints are provided to customers.

Does the complaint officer have autonomy to resolve complaints?

Yes. The Complex Queries and Complaints team ensures that the investigation is undertaken in a thorough and timely manner. They work alongside and support staff throughout Livv Housing Group to ensure there is accountability for complaints in each business area. The Complex Queries and Complaints team takes full ownership through to resolution.



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

The Complex Queries and Complaints team 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 Complex Queries and Complaints team or Manager will intervene, to ensure these are either overcome or escalated internally, as appropriate; this includes with our senior leadership team. The Executive Team receives regular reports on performance relating to complaints and ensures that there is leadership from the top of the organisation.

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:

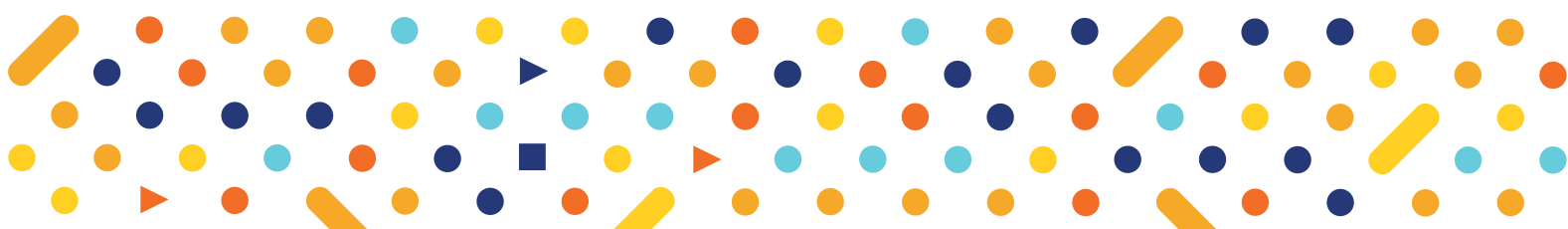
Exchange Tower, Harbour Exchange Square, London E14 9GE. If you have any further questions, please do not hesitate to contact myself on 0151-290-7000."

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?

90% of all complaints (408 of 454) received from 1 December 2020 to 30 September 2021 were resolved at Stage 1.



4. Communication

Are residents kept informed and updated during the complaints process?

Yes, all customers receive an acknowledgement of their complaint by the Complex Queries and Complaints team. They are kept up to date through phone calls and email and, for the more complex cases where more time to investigate is required, they are contacted to agree an extension. Finally, they receive a full written outcome of their complaint, which is often accompanied by a telephone call from the investigating manager to explain the reason for the decision. We understand and appreciate that we are dealing with people and whilst managing complaints is a process, we see the importance of this level of engagement, particularly where the decision is not to uphold the complaint.

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 and logged within five working days of receipt; we aim to achieve this within one working day and 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, 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?

90% of all resolved complaints (408 of 454) from 1 December 2020 to 30 September 2021 were resolved at stage one.

What proportion of complaints are resolved at stage two?

10% of all complaints (46 of 454) escalated to stage two from 1 December 2020 to 30 September 2021, and of these 46 stage two complaints, 74% (34 of 46) were fully resolved with 26% (12 of 46) escalating to requests for evidence by the Housing Ombudsman.



What proportion of complaint responses are sent within Code timescales?

- Stage one – 74% (301 of 408)
- Stage one (with extension to 20 days) – 20% (83 of 408)
- Stage two – 63% (29 of 46)
- Stage two (with extension to 30 days) – 13% (6 of 46)

In addition, 6% of total Stage one complaints (24 of 408) and 24% of total Stage two complaints (11 of 46) required further extensions to Code timescales. In all cases, customers were kept informed of progress, with extensions requested to allow more time to investigate and fully respond to the complaints.

The Complex Queries and Complaints team monitors timescales for all complaints and have implemented checkpoints and escalations on days 1 and 5 of an investigation and then on a daily basis from day 6 onwards to ensure timescales are consistently met.

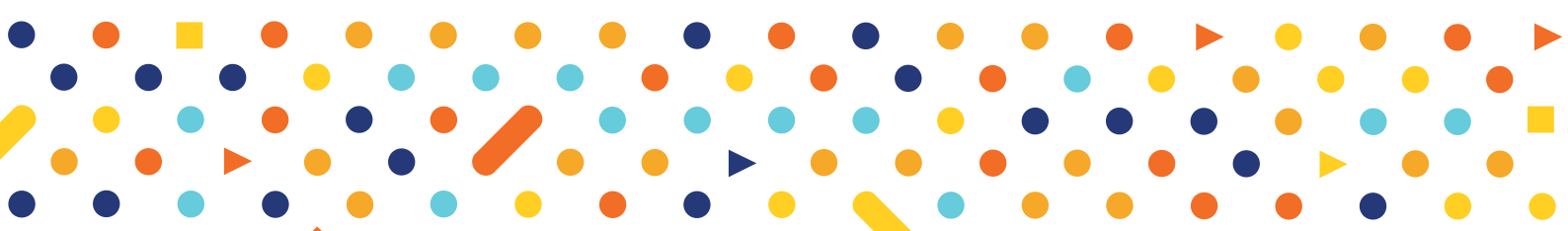
Where timescales have been extended did we have good reason?

Timescales were extended when more time was needed to investigate the issue being raised by the customer so that we could provide a full and considered reply. We are continually working to improve the number of complaints resolved without extended timescales. The increase in volume of complaints has resulted in a total of 124 cases for this review period requiring an extension to the timescale, with 52% of these extensions occurring in August and September in line with the increase in volume of complaints. By comparison, from 1st December 2020 to 31st July 2021, 17% of all complaints required an extension to the timescale.

Having identified an increase in timescale extensions, we immediately commissioned a review and have implemented improvements in our process that will allow for spikes in volumes. This has been a short term impact as a result of the rise in the number of complaints, following the increase in requests for repairs over August and September 2021, which coincided with the time when we were implementing changes to our operating model.

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, 64 customers replied to our satisfaction question and 19 of these were fully satisfied, giving a score of 29.7%. This is measured against a target of 45% reflecting our ambition to continually improve and be recognised by customers for doing so. As part of our focus on improving the whole customer journey for complaints, we have introduced a Complaints Effectiveness measure, which is a blended measure reviewing performance across five key indicators and customer touchpoints;

- Volume of complaints per 1,000 tenancies
- Proportion of Stage one complaints resolved within ten days
- Customer satisfaction with complaint handling
- Implemented learnings from complaint feedback
- Proportion of complaints escalating to Stage two

This measure is reported to our Customer Services Committee on a quarterly basis.

5. Cooperation with Housing Ombudsman Service

Were all requests for evidence responded to within 15 days?

12 requests for information were logged during the review timeframe and all, with the exception of 1, were responded to within 15 days.

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

Yes, we contacted the Ombudsman to explain the situation and agree a new timescale.

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 4 of our 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?

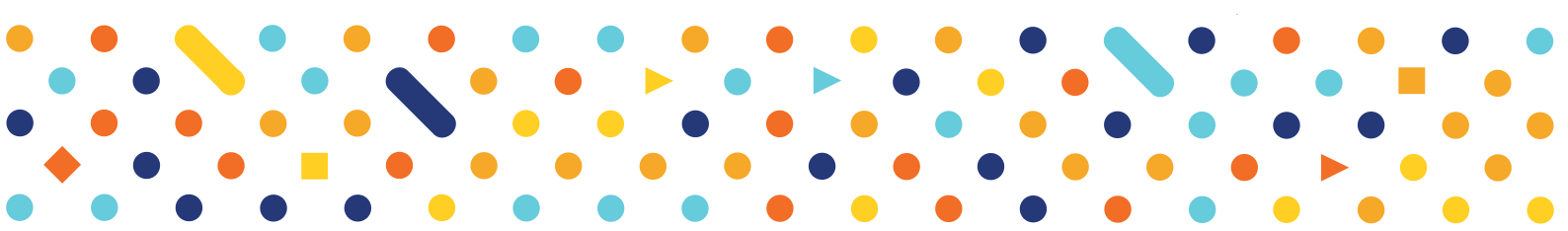
We always seek to resolve the situation for our customer and then look beyond the circumstances of the individual complaint and consider whether systems or processes need amending for the benefit of all customers. This forms part of our regular reporting and planning process and we report the changes that we've made to customers via our website and in articles in our customer magazine.

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/>



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. Complaints performance is discussed quarterly at each meeting, with an annual summary also reviewed. 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?

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. We will continue to carry out a self-assessment on an annual basis to ensure we are maintaining our standards and gauge how we are performing against the code.

What changes have we made?

The creation of our new Complex Queries and Complaints team was informed by feedback from our customer feedback channels and demonstrates our commitment to engaging with customers to resolve their issues alongside adhering to the code and ensuring that complaints are dealt with effectively and used as a tool for continuous improvement. Our risk management reporting system has been updated with metrics showing our compliance against the Code.

