

Appendix 1 - Housing Ombudsman Service - Complaint Handling Code Self-assessment form 2024-25 for Lune Valley Rural Housing Association (LVRHA)

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p>Please see Complaints Policy section 3.</p> <p>‘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.’</p>	
1.3	<p>A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	<p>Please see Complaints Policy:</p> <p>4.3 ‘A customer does not have to use the word ‘complaint’ for it to be treated as a complaint. A complaint that is submitted via a third party or representative, such as family members, carers, people with power of attorney will be handled in line with this policy. Customers will be given the choice if they wish to make a complaint, if they are unhappy about our services.’</p>	

			4.6 LVRHA will accept complaints made in person, via email, telephone, letter or through any other communication channels such as the LVRHA My Account App, website or social media. Any complainants via social media will be taken offline, and the customer will be encouraged to continue their complaint either by email, telephone or letter.	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	<p>Please see Complaints Policy 3. Definitions and</p> <p>4.2 -'A service request is a request from a resident to LVRHA requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.'</p> <p>4.3 A complaint is defined as 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</p>	
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	<p>Please see Complaints Policy:</p> <p>4.4 'A complaint will be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. LVRHA will not</p>	

			stop our efforts to address the service request if the resident complains.'	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Please see Complaints Policy: 4.5 'An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to. Where LVRHA ask for wider feedback about our services, we will also provide details of how residents can complain.'	We also ask customers to give their views about services we provide, through transactional and TSM perception surveys and wider resident engagement feedback. We include information on how to make a complaint if they are dissatisfied with these services.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	Please see Complaints Policy section 5: 5. Exclusions 5.1 'We will consider each complaint on its own merits and consider the individual circumstances' and below at 2.2. 5.2 'If LVRHA decides not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take	

			that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell LVRHA to take on the complaint.'	
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 	Yes	<p>Please see Complaints Policy section 5:</p> <p>5.1 'There will be exceptional situations when a matter will not be considered as a complaint or escalated, which could include:</p> <p>An initial request for a service e.g. first reporting a repair,</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago, • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court, • Insurance matters where an insurance claim has been made and this is being dealt with by LVRHA insurers. Note that complaints about delays accessing the complaints procedure or other complaints not part of the insurance claim will be investigated, but not insurance claim until those steps have been exhausted. Complaints will be dealt with by following the Housing Ombudsman's Guidance on complaints involving insurance issues (housing-ombudsman.org.uk) including clarity on 	

			<p>what can be considered through the complaints procedure.</p> <ul style="list-style-type: none"> • Matters that have previously been considered under the complaints policy, • On the basis that it has been pursued in a way that is unacceptable and has been dealt with under our Unacceptable Behaviour Policy, • Persons or bodies over which LVRHA has no control.' 	
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>Please see Complaints Policy:</p> <p>4.7 'LVRHA will accept complaints referred to us within 12 months of the issue occurring or the customer becoming aware of the issue unless they are excluded on other grounds. We will consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.'</p>	
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.</p>	Yes	<p>Please see Complaints Policy:</p> <p>5.2 'If LVRHA decides not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell LVRHA to take on the complaint.'</p>	
2.5	<p>Landlords must not take a blanket approach</p>	Yes	<p>Please see Complaints Policy:</p>	

	to excluding complaints; they must consider the individual circumstances of each complaint.		<p>5.1 We will consider each complaint on it's own merits and consider the individual circumstances. There will be exceptional situations when a matter will not be considered as a complaint or escalated, which could include:'</p> <p>5.2 'If LVRHA decides not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell LVRHA to take on the complaint.'</p>	
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Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.		<p>Please see Complaints Policy:</p> <p>6.1 'LVRHA will make it easy for our customers to complain by providing different channels through which customers can make a complaint. We will consider our duties under the Equality Act 2010 and endeavour to anticipate the needs and reasonable adjustments of residents who may</p>	

			<p>need to access the complaints process.'</p> <p>8.3 'LVRHA will make reasonable adjustments for customers where appropriate under the Equality Act 2010. LVRHA will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments will be kept under active review.'</p>	
3.2	<p>Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.</p>	Yes	<p>Please see Complaints Policy:</p> <p>6.2 'Customers can raise their complaints in any way and with any colleague. All colleagues will be made aware of the complaints process and be able to pass details of the complaint to the Complaints Officer – the Customer Insight Partner.'</p>	<p>The managing agent for LVRHA has ensured -</p> <p>All members of Executive Leadership Team, Senior Management Team and Managers received training on revised Complaint Handling Code in March 2024.</p> <p>All Colleagues receive MGI Customer Service training and we have champions in place.</p> <p>Customer Insight Partner will be running refresher training at all customer facing team meetings during quarter one (April-June) to refresh awareness of the complaints process and how to register complaints on our current contact management system.</p>

3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>Please see Complaints Policy:</p> <p>1.4 'This policy provides a framework to promote a positive culture and support strong resident-landlord relationships. It means things can be put right for customers when they have gone wrong. It will help LVRHA to develop and improve services. It follows established dispute resolution principles: to be fair, put things right, and learn from outcomes'</p> <p>4.1 'Effective complaint handling enables customers to be heard and understood and for LVRHA to put right for customers when they have gone wrong and help LVRHA to develop and improve services.'</p> <p>6.3 'LVRHA recognise the value of complaints and high volumes of complaints are not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that customers are unable to complain.'</p>	<p>Please see Complaints Policy:</p> <p>1.3 'We welcome feedback from our customers, including complaints and compliments and carry out regular transactional and perception customer satisfaction surveys.'</p> <p>21/22 - 1 Stage One, 1 Stage Two 22/23 - 1 Stage One, 1 Stage Two, 1 23/24 - 2 Stage One. (up to end March 24)</p> <p>The managing agent is supporting the Government '<i>Make Things Right</i>' campaign by improving the layout of information available on our website/ my account customer portal for service requests such as repairs, damp and mould, asb and making a complaint in March/April 2024.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the	Yes	<p>Please see Complaints Policy Section 8 – Complaint Handling process:</p> <p>8.2 'LVRHA has a two stage complaints process, and we will take responsibility for ensuring that any</p>	

	landlord's website.		<p>third parties handle complaints in line with this policy'</p> <ul style="list-style-type: none"> • 'Complaint Acknowledgment & Logged – target response of 5 working days • Stage 1: Manager/Team Leader Review – target response of 10 working days once you have received the acknowledgement response. • Stage 2: Head of Service/Director Review – target response of 20 working days. <p>Complaint Policy is published on our website: link to new policy will be added after Board approve in May</p>	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<p>Please see Complaints Policy:</p> <p>6.4 'LVRHA will make this Complaints Policy available in a clear and accessible format for all customers on our website, in publications. A copy can be provided upon request. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy including information about the Housing Ombudsman Service and the HOS Complaint Handling Code will be published on our website.'</p>	
3.6	Landlords must give residents the opportunity to have a representative deal	Yes	Please see Complaints Policy:	

	with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.		6.5 'LVRHA will give customers the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with LVRHA.'	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<p>Please see Complaints Policy: 6.4 'The policy including information about the Housing Ombudsman Service and the HOS Complaint Handling Code will be published on our website'</p> <p>Please see extract from our complaint acknowledgement template: 'You can always contact the Housing Ombudsman Service at any point during the complaint process for advice and guidance, although they only investigate complaints once we have completed our internal process. Further information is available on the website www.housing-ombudsman.org.uk or telephone 0300 111 3000.'</p>	

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team	Yes	Please see Complaints Policy:	The managing agent's Director

	assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.		7.1 The managing agent's Customer First Team, which includes a Customer First Manager and Customer Insight Partner, will take responsibility for complaint handling, including liaison with the HOS and ensuring complaints are reported to the governing body (or equivalent). We refer to that person or team as the 'complaints officer'.	of Business Improvement is responsible for ensuring complaints are reported to LVRHA Board.
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Please see Complaints Policy: 7.1 'The complaints officer has access to colleagues at all levels to facilitate the prompt resolution of complaints. They have the authority and autonomy to act to resolve disputes promptly and fairly and to escalate any issues or complaints to the Director of Customer Experience if required.'	All complaints are investigated by Managers/ Team Leaders at stage one and Head of Services/ Directors at stage two. The Customer Insight Partner will act in a supporting capacity and has authority and autonomy to ensure complaints are resolved promptly and fairly.
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively	Yes	Please see the Complaints Policy: 7.2 'LVRHA will promote a positive complaint handling culture and the value of learning of complaints. All relevant colleagues will be suitably trained in the importance of complaint handling.'	The managing agent has recently undertaken Mary Gober International (MGI) Customer Service training and deployed Champions across the business who are supporting Managers in embedding the principles of taking responsibility and ownership. Complaint refresher training will be delivered to all

				<p>colleagues during Q1 2024-25 with emphasis on complaint handling and learning.</p> <p>The Customer First Manager and Customer Insight Partner lead on complaint handling and complaint learning sessions through the Insight and Impact Group. This group is made up of Managers, Head of Services and Executive Leadership Team.</p>
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<p>Please see our Complaints Policy on the website: link to new policy will be added after Board approve in May.</p> <p>8.1 'This policy provides the framework for handling complaints. We will not treat customers differently if they complain.'</p>	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	<p>See Complaints Policy 8.1 'The early and local resolution of issues between LVRHA and our customers is key to effective complaint handling. It may be possible to provide an explanation and resolution to the customer's</p>	LVRHA have 2 stage policy only.

			satisfaction when they first contact us, such as delay in a contractor attending an appointment by ringing the contractor, apologising and informing the customer when the contractor will arrive and if so we will record details on the system, if not we will log a complaint.'	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Please see Complaints Policy: 8.2 'LVRHA has a two stage complaints process and we will take responsibility for ensuring that any third parties handle complaints in line with this policy.'	In accordance with the HOS CHC we adhere to a two stage complaints process.
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	Please see Complaints Policy: 8.2 'LVRHA has a two stage complaints process and we will take responsibility for ensuring that any third parties handle complaints in line with this policy.'	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Please see Complaints Policy: 8.2 'LVRHA has a two stage complaints process and we will take responsibility for ensuring that any third parties handle complaints in line with this policy.'	The managing agent liaises with colleagues and Contractors/ Developers as required.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition".	Yes	Please see Complaints Policy: 8.3 'When a complaint is logged at Stage 1 or escalated to Stage 2, LVRHA will set out our	Customer Insight Partner or investigating officer will contact the customer when a complaint is received to listen, ask the customer for clarifications and

	If any aspect of the complaint is unclear, the resident must be asked for clarification.		understanding of the complaint and the outcomes the customer is seeking. This is referred to as “the complaint definition”. If any aspect of the complaint is unclear, we will ask the customer for clarification.’	check their understanding of the complaint to agree the definition and ask the customer what their desired outcome is.
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	Please see Complaints Policy: 8.3 ‘We will be clear which aspects of the complaint we are, and are not, responsible for and clarify any areas where this is not clear.’	From the receipt of a complaint, the Customer Insight Partner will acknowledge the complaint and carefully manage the expectations of customers ensuring that no promises are made on things we cannot deliver or would cause upset to other customers. At all complaint stages the investigating officer will be clear on areas of the complaint they are responsible and where they are not, responsible. This will help to manage customers’ expectations.
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Please see Complaints Policy: 8.4 ‘At each stage of the complaints process, complaint handlers will: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address	Embodied in the managing agents Behaviours: • Genuinely care • Take responsibility • Have respect • Be adaptable • Work together • Be curious • Make it happen • Always improving All colleagues have received

			<p>any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully'</p>	<p>Mary Gober International (MGI) customer service training and are empowered to put things right through taking responsibility and ownership.</p> <p>The Customer Insight Partner reviews and allocates all complaints for investigation. All investigations and responses are also overseen by Customer First Manager to provide independent oversight and quality assurance. All stage 1 responses are reviewed by Head of Service and stage 2 responses are reviewed by Director of the Service area or Director of Customer Experience.</p>
5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<p>Please see Complaints Policy: 8.5 'Where a response to a complaint will fall outside the timescales set out in this policy, The managing agent will agree with the customer suitable intervals for keeping them informed about their complaint.'</p>	
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of	Yes	<p>Please see Complaints Policy: 8.6 'LVRHA will make reasonable adjustments for customers where appropriate under the Equality Act</p>	

	any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.		2010. LVRHA will keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments will be kept under active review.'	
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<p>Please see Complaints Policy:</p> <p>8.7 'LVRHA will not refuse to escalate a complaint through all stages of the complaints procedure unless we have valid reasons to do so as outlined in the exclusions in Section 5.</p> <p>5. 'We will consider each complaint on it's own merits and consider the individual circumstances. There will be exceptional situations when a matter will not be considered as a complaint or escalated, which could include:</p> <ul style="list-style-type: none"> • An initial request for a service e.g. first reporting a repair, • The issue giving rise to the complaint occurred over twelve months ago, • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court, • Insurance matters where an insurance claim has been made and this is being dealt with by 	

			<p>LVRHA insurers. Note that complaints about delays accessing the complaints procedure or other complaints not part of the insurance claim will be investigated, but not insurance claim until those steps have been exhausted. Complaints will be dealt with by following the Housing Ombudsman's Guidance on complaints involving insurance issues (housing-ombudsman.org.uk) including clarity on what can be considered through the complaints procedure.</p> <ul style="list-style-type: none">• Matters that have previously been considered under the complaints policy,• On the basis that it has been pursued in a way that is unacceptable and has been dealt with under our Unacceptable Behaviour Policy,• Persons or bodies over which LVRHA has no control. <p>5.2 'If LVRHA decides not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion</p>	
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			has been fairly applied, the Ombudsman may tell LVRHA to take on the complaint.'	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	<p>Please see Complaints Policy:</p> <p>8.8 'A full record will be kept of the complaint, and the outcomes at each stage. This will include the original complaint and the date received, all correspondence with the customer, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.'</p>	<p>All complaints are logged on the Civica CX Housing Management System. All exchange of contacts are recorded on this platform throughout the complaints process. The investigating officer and Customer Insight Partner are responsible for keeping the complaint records up to date.</p> <p>We currently use external customer feedback platforms for both Tenant Satisfaction Measure and transactional surveys.</p>
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<p>Please see Complaints Policy and Compensation Policy.</p> <p>10.1 'Where something has gone wrong LVRHA will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. This can happen at any stage of the process, without the need for escalation.'</p>	<p>Embodied in the managing agent Behaviours</p> <ul style="list-style-type: none"> • Genuinely care • Take responsibility • Have respect • Be adaptable • Work together • Be curious • Make it happen • Always improving <p>All colleagues have undertaken Mary Gobar International (MGI) Customer Service training and</p>

				are empowered to put things right through taking responsibility and ownership.
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	Please see the Unacceptable Behaviour Policy. INSERT LINK after LVRHA Board approve in May 2024	
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<p>Please see extract below from Complaints and Unacceptable Behaviour Policy:</p> <p>'Equality, Diversity and Inclusion</p> <p>The managing agent is aware of our responsibilities under the Equality Act 2010 and is committed to equality, diversity and inclusion. We will endeavour to provide a service that seeks to meet the needs of a particular individual or household and ensure no one is disadvantaged in accessing our services. We recognise that some of our customers may have permanent or transitory vulnerabilities and where customers require additional support, we will endeavour to make reasonable adjustments. We will also take vulnerability into account when carrying out case risk assessments.</p>	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.		Please see Complaints Policy: 9.1 'LVRHA have a two stage complaints process. We will consider which complaints can be responded to as early as possible, and which require further investigation. We will consider factors such as the complexity of the complaint and whether the customer is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the customer.'	The Customer Insight Partner carries out an initial assessment and discusses with the investigating officer when allocating a complaint for investigation.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Please see Complaints Policy: 9.2 'Complaints will be acknowledged, defined and logged within five working days of the complaint being received.' LVRHA will issue a full response to stage 1 complaints within 10 working days of the complaint being acknowledged.'	The Customer Insight Partner will contact the customer within 5 working days of a complaint being received and advise the complaint response will be issued within 10 working days – following the stage one of complaints procedure.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Please see Complaints Policy: 9.2 'LVRHA will issue a full response to stage 1 complaints within 10	Customer Insight Partner and Customer First Manager oversight.

			working days of the complaint being acknowledged.'	KPI Reporting
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Please see Complaints Policy: 9.2 'If an extension to this timescale is needed when considering the complexity of the complaint we will inform the customer of the expected timescale for response. Any extension will be no more than 10 working days without good reason, and the reason(s) will be clearly explained to the customer and they will be provided with the contact details of the Ombudsman. '	Customer Insight Partner and Customer First Manager oversight.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Please see Complaints Policy: 9.2 'If an extension to this timescale is needed when considering the complexity of the complaint we will inform the customer of the expected timescale for response. Any extension will be no more than 10 working days without good reason, and the reason(s) will be clearly explained to the customer and they will be provided with the contact details of the Ombudsman. '	We provide the customer the opportunity to appeal and escalate their complaint as part of our complaint response at stage one and two. We also advise the customer throughout the complaints process that they can approach Housing Ombudsman Service for any advice and guidance.
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the	Yes	Please see Complaints Policy: 9.2 'A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are	In a complaint response we will include details of any outstanding actions and advise and agree with customer how they will be kept updated on progress of outstanding actions. Customer Insight

	resident.		completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident. The response will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.'	Partner oversees implementation.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Please see Complaints Policy: 9.2 'A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident. The response will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.'	As part of complaint investigation, the investigating officer will ensure all the elements of the complaint are investigated, providing clear reasons for decision and referring to relevant policies, law and good practices where appropriate. The Customer Insight Partner or Customer First Manager reviews investigations and responses before they are issued to ensure.
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay	Yes	Please see Complaints Policy: 9.2 'Where customers raise additional complaints during the investigation, these will be incorporated into the stage 1 response if they are related and the stage 1 response has not been	Customer Insight Partner and Customer First Manager oversight.

	the response, the new issues must be logged as a new complaint.		issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.'	
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 	Yes	<p>Please see Complaints Policy:</p> <p>9.2 'The written complaint response to the customer at the completion of stage 1 will be in clear, plain language and include:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.' 	<p>LVRHA follows Housing Ombudsman Service complaint response templates guidance and ensures comprehensive response is shared with the customer. Each response includes</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. <p>Templates provide a framework to ensure key information is included. Complaint responses are all individual.</p>

				The managing agent colleagues have undertaken Mary Guber International (MGI) Customer Service training to ensure communication with customers is open, clear and accessible.
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Please see Complaints Policy 9.3 'If all or part of the complaint is not resolved to the customer's satisfaction at stage 1, it must be progressed to stage 2 of the procedure. Stage 2 is LVRHA's final response. Customers wishing to appeal should do so within 20 working days.'	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Please see Complaints Policy: 9.3 'Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.'	Customer Insight Partner will acknowledge complaint escalation to stage two within five working days of request being made.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to	Yes	Please see Complaints Policy: 9.3 'Customers are not be required	

	make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		to explain their reasons for requesting a stage 2 consideration. LVRHA will make reasonable efforts to understand why a customer remains unhappy as part of its stage 2 response.'	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Please see Complaints Policy: 9.3 'The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.'	All stage two complaints are investigated by a Head of Service, or a Director not the Manager/ Team Leader who investigated stage 1. If the Head of Service/ Director has been actively involved in the matter we allocate to different one.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Please see Complaints Policy: 9.3 'We will issue a final response to the stage 2 within 20 working days of the complaint being acknowledged.'	Customer Insight Partner and Customer First Manager oversight. KPI Reporting
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Please see Complaints Policy: 9.3 'If an extension to this timescale is needed when considering the complexity of the complaint we will inform the customer of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) will be clearly explained to the customer and they will be provided with the contact details of the Ombudsman.'	Customer Insight Partner and Customer First Manager oversight. KPI Reporting
6.16	When an organisation informs a resident		Please see Complaints Policy:	

	about an extension to these timescales, they must be provided with the contact details of the Ombudsman.		9.3 'If an extension to this timescale is needed when considering the complexity of the complaint we will inform the customer of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) will be clearly explained to the customer and they will be provided with the contact details of the Ombudsman.'	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.		Please see Complaints Policy: 9.3 'A complaint response will be provided to the customer when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident.'	The Customer Insight Partner or Customer First Manager reviews investigations and responses before they are issued.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Please see Complaints Policy: 9.3 'The response will address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.'	The Customer Insight Partner or Customer First Manager reviews investigations and responses before they are issued.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage;	Yes	Please see Complaints Policy: 9.3 'The written complaint response to the customer at the completion of	LVRHA uses response templates and ensure comprehensive response is shared with the customer.

	<ul style="list-style-type: none"> b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 		<p>stage 2 will be in clear, plain language and include:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response' 	<p>Templates provide a framework to ensure key information is included.</p> <p>The managing agent colleagues have undertaken Mary Gober International (MGI) Customer service training to ensure communication with customers is open, clear and accessible.</p>
6.20	<p>Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.</p>	Yes	<p>Please see below extract from Complaints Policy: At the completion of each stage of the complaints process LVRHA will write to the resident advising them of the following:</p> <ul style="list-style-type: none"> • the complaint stage • the outcome of the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of any outstanding actions • details of how to escalate the matter if dissatisfied. <p>Templates provide a framework to ensure key information is included.</p>	<p>Head of Service/ Director investigating officers and co-ordinate.</p>

			The managing agent colleagues have undertaken Mary Gober International (MGI) customer service training to ensure communication with customers is clear and accessible.	
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>Where something has gone wrong a landlord must acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<p>Please see Complaints Policy:</p> <p>10. 'Where something has gone wrong LVRHA will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. This can happen at any stage of the process, without the need for escalation. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; 	<p>The investigating officer will acknowledge and apologise where something has gone wrong and set out the actions they intend to take (already taken) to put things right.</p> <p>The managing agent colleagues have received Mary Gober International (MGI) Customer Service training and are empowered to put things right.</p> <p>Please see the Compensation Policy for detail.</p>

			<ul style="list-style-type: none"> • Providing a financial remedy; • Changing policies, procedures or practices • Gestures of goodwill (e.g. vouchers, chocolates, flowers).' 	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<p>Please see Complaints Policy:</p> <p>10.2 'Any remedy will reflect the impact on the customer as a result of any fault identified and take account of the guidance issued by the HOS. The remedy offer will clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed will be followed through to completion. Please see LVRHA Compensation Policy.'</p>	Please also see the Compensation Policy for details of redress, including financial compensation customer as result of service failure.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	<p>Please see Complaints Policy:</p> <p>10.2 'Any remedy will reflect the impact on the customer as a result of any fault identified and take account of the guidance issued by the HOS. The remedy offer will clearly set out what will happen and by when, in agreement with the customer where appropriate. Any remedy proposed will be followed through to completion. Please see LVRHA Compensation Policy.'</p>	We aim to agree the remedy and any timescales with the customer before issuing the response. Our training for colleagues and complaint responses reflect this. The investigating officer will take ownership of completing any actions identified. The Customer Insight Partner provides oversight.
7.4	Landlords must take account of the guidance issued by the Ombudsman when	Yes	<p>Please see Compensation Policy.</p> <p>Add Link once Board approve</p>	.

	deciding on appropriate remedies.			
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Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>Please see Complaints Policy:</p> <p>10.3 Reporting: 'LVRHA will produce an annual complaints performance and service improvement report for scrutiny and challenge, which will include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this HOS Complaint Handling Code to ensure our complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of LVRHA's complaint handling performance. This will include a summary of the types of complaints LVRHA has refused to accept; c. any findings of non-compliance with this HOS Complaint Handling Code by the HOS; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the HOS; and f. any other relevant reports or 	<p>KPI Reporting Customer Voice Report New Annual Report</p> <p>Complaint handling performance, satisfaction, learning and service improvements are shared within the Annual Report.</p> <p>Board of Management have oversight of Complaint Handling Code self-assessment and Complaints and Compensation Policies.</p> <p>In addition to above any Housing Ombudsman Service complaint determinations and key reports produced as result of their involvement and learning are also shared with members of the LVRHA Board.</p> <p>Director of Customer Experience will be responsible</p>

			publications produced by the HOS in relation to the work of the landlord.'	for the annual report to Board.
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	Please see Complaints Policy: 10.3 'The annual complaints performance and service improvement report will be reported to our Board and published on the on the section of the website relating to complaints. The Board's response to the report will be published alongside the report.'	Director of Customer Experience will be responsible for sharing this information with the Board of Management. Customer First Manager will be responsible for ensuring complaints performance and service improvement reports are shared on website.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Please see Complaints Policy: 13.2 'LVRHA would also carry out a self-assessment if we were involved in a significant restructure, merger and/or change in procedures or if asked to review and update the self-assessment following a HOS investigation.'	Complaints Procedures have been reviewed to ensure reflect the updated HOS CHC. Letter templates being reviewed to ensure reflect the updated HOS CHC.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Please see Complaints Policy: 13.2 'LVRHA would also carry out a self-assessment if we were involved in a significant restructure, merger and/or change in procedures or if asked to review and update the self-assessment following a HOS investigation.'	We are committed to undertaking a review of self-assessment if requested following an Ombudsman investigation.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to	Yes	Please see the Complaints Policy: 10.3 'If LVRHA is unable to comply with the HOS CHC due to	Customer First Manager will be responsible of making customers aware if we are compliant with the Code, and in

	residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.		exceptional circumstances, such as a cyber incident, we must inform the HOS, provide information to customers who may be affected, and publish this on our website, providing a timescale for returning to compliance with the Code.'	exceptional circumstances where is not possible, we will update our website to reflect this and include timescale when we will be returning compliant with the Code.
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Please see Complaints Policy: 11.1 'LVRHA welcome and recognises the value of complaints and the importance of accountability and transparency and will look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.'	The Customer First Manager and Customer Insight Partner lead on complaint reporting and learning, engaging colleagues from across the business through the Insight and Impact Group to identify service improvements. A review of themes and learning also informs improvement projects, such as Repairs Customer Experience for 2024/25.
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Please see Complaints Policy: 11.1 'LVRHA will also: <ul style="list-style-type: none"> use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.' 	The managing agents colleagues undertaken Mary Gober International (MGI) Customer Service training and are empowered to put things right through taking responsibility and ownership.

			Reporting includes themes and colleagues are required to identify learning points before closing a case.	This programme compliments positive complaint handling and learning culture.
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	Please see Complaints Policy: 11.1 'report back on wider learning and improvements from complaints to stakeholders, such as customers' panels, colleagues and relevant committees.'	Board: KPI reporting Any determinations Sector learning and best practice New Annual Report
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	Please see Complaints Policy: 11.1 'appoint a suitably senior lead person as accountable for their complaint handling – the Director of Customer Experience, who will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.'	Director of Business Improvement, reporting to LVRHA Board.
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Please see Complaints Policy: 11.2.1 'LVRHA will appoint a Board member to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). The MRC will be responsible for ensuring the Board receives	MRC will be approved at the May meeting.

			regular information on complaints that provides insight on LVRHA's complaint handling performance. This person will have access to suitable information and colleagues to perform this role and report on their findings.'	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Please see Complaints Policy: 11.2.1 'LVRHA will appoint a Board member to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC'). The MRC will be responsible for ensuring the Board receives regular information on complaints that provides insight on LVRHA's complaint handling performance. This person will have access to suitable information and colleagues to perform this role and report on their findings.'	MRC will assume this role.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings;	Yes	The Board and MRC receive the following: Quarterly KPI reporting (TSM format) which includes volumes, categories, themes, % responded to in HOS CHC timescales and any HOS determinations. Customer Voice report includes further detail on issues, trends and	MRC will assume this role and meet with the Customer First Manager.

	and d. annual complaints performance and service improvement report.		learning. Managing agent reports key outcomes of HOS determinations and spotlight reports etc. New Annual Report which complies with HOS CHC requirements to be reported to Board in Aug 2024.	
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to: a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.	Yes	Please see Complaints Policy: 11.3.1 'The managing agent will ensure all relevant colleagues receive training on the complaints policy and know how to log, investigate and respond to complaints. There is a standard objective in relation to complaint handling for all relevant colleagues or third parties that reflects the need to: a. have a collaborative and cooperative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.'	The managing agents colleagues have undertaken Mary Gobar International (MGI) customer service training and are empowered to put things right by taking responsibility and ownership. This programme compliments positive complaint handling and learning culture.

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