



## Complaints Policy

<b>Policy statement</b>	<p>This policy will deliver an open, accountable and outcome focussed complaints process which is easily accessible to customers. It will meet all legal and regulatory requirements and will meet the requirements of the Housing Ombudsman Service Complaint Handling Code.</p> <p>Complaints will be encouraged and are viewed as opportunities to learn and improve the quality of our services. We will use the learning from complaints to drive service improvements and publish the learnings identified and highlight where improvements have been made.</p>
<b>Objective</b>	<p>The objectives are to:</p> <ul style="list-style-type: none"><li>• define what is and what is not a formal complaint</li><li>• how complaints can be made</li><li>• set out clear timescales for acknowledging and responding to complaints</li><li>• create an approach to complaints which is clear, simple and accessible</li><li>• set out a directive that ensures complaints are resolved promptly, politely, and fairly</li><li>• ensure staff take a collaborative and co-operative approach towards resolving complaints across the business</li><li>• set out the actions we will take when things have gone wrong</li></ul>
<b>Policy</b>	<p><b><u>Definition of a complaint</u></b></p> <p>A complaint is defined in-line with the Housing Ombudsman Service Complaint Handling Code as:</p> <p><i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual customer or group of customers'</i></p> <p><b><u>How complaints can be made</u></b></p> <p>A variety of methods are available for customers to complain. These will be easy to use, accessible either verbally, face to face, in writing or via our website which includes an online form.</p> <p>Where complaints are received via social media accounts held by Paradigm, it will not be appropriate for a response on these online channels as this would risk confidentiality. In these circumstances, an acknowledgement of the complaint will be posted online, and a formal response will be sent directly to the customer using alternative communication methods, within our agreed timescales and adhere to the principles of data protection and <a href="#">Paradigm's Privacy Statement</a>.</p> <p>The Complaints Policy will be publicised on the website and newsletters and as part of regular correspondence with customers. A copy of the Complaints Policy will also be provided upon request.</p>

### **Fairness in complaints handling**

A customer focused complaints process will be operated. Customers will be given the opportunity to explain their point of view and the outcome they desire.

The nature of the complaint and the outcome being sought by the customer will be understood and if this is not clear, this will be clarified with the customer prior to any investigation.

It is recognised that many customers may not wish to follow a formal process and just want an issue resolved. Where there is the opportunity to put things right quickly and easily, this will be treated as an informal complaint.

Any decision to try and resolve a customer's issue quickly and informally will be taken in agreement with the customer. If a customer expresses a wish for their concerns to be treated as a formal complaint, this will not be denied. This includes concerns that were previously dealt with informally.

Customers have the opportunity to ask a representative or advocate of their own choice to act on their behalf. Permission will need to be given from the customer to disclose information to their advocate in compliance with data protection requirements before proceeding.

Where a complaint is being made by a group of customers, a lead customer will be identified as a spokesperson to allow the efficient handling of the complaint. Any formal responses will be shared with all parties and subject to data protection requirements.

Complaints will be viewed positively, and all complaints will be investigated in an impartial manner. Full and sufficient information from all parties involved will be sought, ensuring a fair and amicable solution is found wherever possible. Complaints will be responded to once the outcome is known. Any outstanding actions will be confirmed within the complaint response and monitored and progressed with customers outside of the formal process.

Customers will be advised through our website and through our correspondence that they have the right to access the Housing Ombudsman Service for advice and support at any time and not just at the point they have exhausted the complaints process. The Housing Ombudsman Service will however only consider formally investigating a complaint once a complaint has exhausted the complaints process.

### **Reasonable Adjustments**

Disabled and vulnerable customers will not be disadvantaged in accessing the complaints process. To this end reasonable adjustments will be made in compliance with the Equality Act 2010.

There is no prescribed list of reasonable adjustments; the adjustment will depend on the individual's needs. These will be discussed with customers to reach an agreement on what may be reasonable in the circumstances.

Customers will be encouraged to alert Paradigm to any individual needs which may require a reasonable adjustment to be made.

Some examples of the adjustments that can be made include:

- provision of aids such as a language interpreter or a hearing loop

- provision of information in appropriate alternative formats (e.g. large print, audio, coloured paper etc)
- extension of time limits (where it is lawful to do so)
- use of preferred communication method
- use of plain English
- communication through a representative or advocate
- rest or comfort breaks in meetings.

### **What Paradigm will not treat as a complaint**

The following are examples of issues that will not be treated as a complaint:

- an initial enquiry or request for a service
- a report of anti-social behaviour (ASB). This will be dealt with under the ASB policy (unless the matter is in relation to how we have managed the ASB)
- where the issue occurred over 6 months ago, (unless there is a justified reason for the delay i.e. ill health, health & safety issues, safeguarding issues or where a customer was unaware of a service failure until it had a detrimental impact)
- a customer fails to specify the grounds of their complaint
- where Paradigm are not responsible for delivering the service – e.g. Local Authority decisions about nominations or housing benefit claims (where possible we will sign post the customer to the correct service).
- where an issue is, or has been, subject to legal proceedings involving Paradigm
- the outcome of appeals or reviews against service of notices, such as Section 21 notices, Minded To notices, notices seeking possession on mandatory grounds and appeals regarding housing allocation
- where the issue is subject to an insurance claim against Paradigm by customers or third parties (any other elements outside of the insurance claim will still be considered through the complaints process)
- matters that have already been considered and exhausted under Paradigm's complaints process
- where the Housing Ombudsman Service has already determined the outcome of an investigation.

Where a complaint has not been accepted, a full and detailed explanation will be given setting out the reasons why the matter is not suitable for the complaints process.

Customers will have a right to challenge this decision by raising their complaint directly to the Housing Ombudsman Service, details of which can be found within this policy.

### **Putting things right**

Where things have gone wrong, these will be formally acknowledged through correspondence setting out what action is to be taken to put things right.

Examples of where things go wrong include:

- where there was an unreasonable delay
- inaccurate or inadequate explanation or information was provided to the customer
- our policy or procedure was not followed correctly
- unprofessional behaviour by staff.

Where failures have been identified, a number of remedies are available including:

- acknowledging where things have gone wrong
- providing an explanation, assistance or reasons
- apologising
- taking action if there has been a delay
- reconsidering or changing a decision
- providing a remedy to put things right such as vouchers, flowers or financial remedy (covered via our Remedies and Compensation Policy)
- changing policies, procedures or practices

Any compensation awarded will be considered in line with our Remedies and Compensation Policy and take into account any statutory payments that are due, service failures identified and if any quantifiable losses have been incurred.

### **Formal complaint stages**

The complaints procedure will consist of two stages. Where a formal complaint has been made, this will be logged at stage one of the complaints procedure.

If the complaint has not been resolved to the customer's satisfaction it shall be progressed to the next stage (stage two).

Complaints will be logged within five working days of being received by our Customer Resolution Team who oversee the complaints process. The formal complaints process will commence once a full and formal acknowledgement is issued to the customer.

Where customers raise additional complaints during an ongoing investigation and the formal response has not been issued, these additional matters will be incorporated into the existing complaint. Where a response has been issued or it is not appropriate to incorporate within an existing complaint, this will be logged as a new complaint.

**A stage one** complaint will be allocated to the team leader or manager of that service area to investigate. It may be allocated to a team leader or manager from a different service area if that is required to ensure we can respond within our published timescales.

Following an investigation, a decision will be reached and communicated within 10 working days from the acknowledgement date. Where this is not possible, an explanation and a date by when the stage one response will be received will be communicated to the customer. This will not exceed a further 10 working days without good reason and in agreement with the customer.

The following are examples of a good reason why a complaint response may be extended:

- a delay by a third party, over which Paradigm has no control in providing information
- requiring further time to undertake interviews
- needing longer to acquire all the information required from multiple sources to enable a landlord to properly investigate a long-standing, complex case.

A formal response to a stage one complaint will be responded to in writing detailing the stage of the process and the next steps available if a customer remains dissatisfied. Where a customer is unhappy with the stage one resolution or remedy, they have the right to request to escalate their complaint to stage two.

No complaint will be unreasonably refused to be escalated through all stages of the complaints process. Where the Customer Resolution Team in liaison with a senior manager decides it is

not appropriate to escalate a complaint, a full explanation will be given to the customer. At this point, it will be made clear that the response is a full and final response and information will be provided to the customer on referral to the Housing Ombudsman Service.

Examples where a complaint may not be escalated include:

- the basis of the complaint is changed by the customer as the investigation proceeds
- requesting an escalation prior to a stage one response being received within the published timescales
- requesting escalation 6 months after the stage one response is issued (unless there is a justified reason for the delay i.e. ill health, health & safety issues, safeguarding issues or where a customer was unaware of a service failure until it had a detrimental impact)
- not co-operating with the complaint's investigation process at stage one.

**A stage two** complaint will be allocated to the manager of the colleague who responded at stage one. It may be allocated to a senior manager from a different service area if that is required to ensure we can respond within our published timescales.

Following an investigation, a decision will be reached and communicated within 20 working days from the acknowledgement date of the stage two complaint. Where this is not possible, an explanation and a date by when the stage two response will be received will be communicated to the customer. This will not exceed a further 10 working days without good reason and in agreement with the customer.

A formal response to a stage two complaint will be in writing detailing the stage of the process and the next steps available if they remain dissatisfied. The stage two response concludes and exhausts the formal complaints process.

#### **Next steps available for the customer**

If a customer is dissatisfied with the outcome of their complaint once it has exhausted the complaints process, the customer may take their complaint to a designated person. A designated person can be an MP or a councillor from the local authority area their home is in.

A designated person can review a complaint themselves or refer the complaint directly to the Housing Ombudsman Service.

Alternatively, a customer can contact the Housing Ombudsman Service directly 8 weeks after the final decision.

#### **Formal Complaints Process Maps**

**Stage 1** - The complaint will be acknowledged in writing within 5 working days and allocated to the team leader or manager of that service area to investigate and who will aim to formally respond in writing within 10 working days

Unable to resolve complaint at stage 1



**Stage 2** - The escalated complaint will be acknowledged in writing within 5 working days and allocated to the manager of the colleague who responded at stage one and who will aim to formally respond in writing within 20 working days

Internal complaints process exhausted



Refer to Designated Person or Housing Ombudsman Service

### **Compliance with Housing Ombudsman Service Complaint Handling Code**

Paradigm will cooperate with the Housing Ombudsman Services requests for evidence and provide this within 15 working days.

Where Paradigm is unable to provide this information to the Housing Ombudsman Service within this timeframe, Paradigm will provide the Housing Ombudsman Service with an explanation for the delay.

#### **Housing Ombudsman Service contact details:**

The Housing Ombudsman Service can be contacted via:

- online complaint form: [www.housing-ombudsman.org.uk/residents/make-a-complaint/](http://www.housing-ombudsman.org.uk/residents/make-a-complaint/)
- phone: 0300 111 3000
- email: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)
- postal address: Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ

[www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)

### **Dealing with persistent complainants**

Being persistent in trying to resolve an issue or a complaint is not in itself frivolous or vexatious and senior managers will assess each case individually.

Where it has been determined by the Customer Resolution Team in liaison with the senior managers that a complaint or complainant is frivolous or vexatious, the principles of our Managing Unacceptable Behaviour Policy, taking into account the individuals needs and circumstances will apply.

Some examples (but not limited) of the type of behaviour that fall under unacceptable behaviour are:

- insisting on the complaint being handled in ways which are incompatible with our procedure or the Housing Ombudsman Service Complaints Handling Code
- making excessive demands on the time and resources of staff with lengthy phone calls, emails to numerous staff or detailed letters every few days and expecting immediate responses
- once the complaints process has been exhausted, refusing to accept the outcome of decisions and repeatedly complaining about the same issue with no new evidence.

#### **Scope**

This policy applies to current tenants, former tenants, shared owners, leaseholders and landlords.

Recourse to the Housing Ombudsman Service is limited to:

- a person who is or has been in a landlord/tenant relationship with Paradigm. This includes people who have a lease, tenancy, licence to occupy, service agreement or other arrangement to occupy premises owned or managed by a member
- if the complaint is made by an ex-occupier, they must have had a legal relationship with Paradigm at the time that the matter complained of arose
- an applicant for a property owned or managed by Paradigm
- a representative of any of the people above who is authorised by them to make a complaint on their behalf
- a representative of any of the people above who does not have the capacity to authorise a representative to act on their behalf. The Housing Ombudsman must be satisfied that the representative has the legitimate authority to act on the person's behalf
- a person with authority to make a complaint on behalf of any of the people above who is deceased.

<b>Roles and Responsibility</b>	<p><b>Executive Director - Customer</b> has overall responsibility for this policy.</p> <p><b>Head of Customer Service</b> is responsible for:</p> <ul style="list-style-type: none"> <li>• ensuring the resources are in place to deliver an effective complaints process across the organisation</li> <li>• ensuring support from the Leadership Team in Paradigm adhering to their roles and responsibilities for complaint management and learning from complaints to improve service delivery.</li> </ul> <p><b>Customer Resolution Manager</b> is responsible for:</p> <ul style="list-style-type: none"> <li>• overseeing the development and implementation of Paradigm's Complaints Policy, systems, training and Key Performance Indicators (KPIs)</li> <li>• overseeing the day to day management of complaints for the business ensuring these are progressed in-line with policy, process and timescales</li> <li>• determining with senior managers whether a complaint is frivolous and vexatious taking into account an individual's needs and circumstances</li> <li>• overseeing our relationship with the Housing Ombudsman Service</li> <li>• ensuring there is a structured approach in place to learn from complaints and wider customer feedback to support the business to identify priority areas for service improvement</li> <li>• working with the business to analyse complaint trends, identifying overarching themes and making recommendations to the relevant service areas and the wider business for service improvement</li> <li>• providing the Executive Board, Amalgamated Board and relevant customer panels with complaint KPI information including trends, learnings and service improvement actions</li> <li>• providing customers with information on trends identified via complaints and where service improvement actions have been implemented.</li> <li>• ensuring regular communication updates are published to the business and customers, demonstrating complaints performance, learnings and improvements made to services as a result of customer feedback</li> <li>• reviewing the Housing Ombudsman Service's best practice guidance notes and any changes to legislation that may impact the complaints handling process and making necessary changes to policy</li> <li>• conducting an annual self-assessment (and following a change in structure or procedure) against the Housing Ombudsman Service's Complaints Handling Code to ensure compliance</li> <li>• ensuring the Complaints Policy is reviewed regularly (minimum every 3 years)</li> </ul>
---------------------------------	--

**Customer Resolution Team** are responsible for:

- logging and acknowledging complaints within five working days of being received
- processing and allocating complaints to complaint managers who have no conflict of interest and in-line with policy timescales
- logging stage two complaints to a staff member at a senior position who has not been involved in the stage one investigation
- managing any expectations with the customer where a desired outcome is unreasonable
- monitoring complaints and work with complaint managers to ensure they are progressing the complaint to resolution in line with process and timescales
- training and coaching staff to ensure complaint responses are consistent, clearly set out remedies for resolution and next steps available to the customer
- acting as an independent point of contact for the customer throughout a complaint investigation
- managing escalated or complex matters relating to the management of complaints
- agreeing where Paradigm will not accept a complaint in-line with the policy exclusions and providing a full and detailed explanation to the customer why the matter is not suitable for the complaints process with details of the Housing Ombudsman Service
- deciding to accept a complaint where the issue occurred over 6 months ago, and there is a justified reason to do so
- agreeing and implementing any reasonable adjustments identified in liaison with the customer
- agreeing complaint timescale extensions in liaison with the complaint manager and the customer
- provide regularly training to the business on effective complaint handling and ensuring guidance documents and template letters are updated in line with best practice guidance
- liaising with a senior manager to identify where a complaint will not be escalated to stage two and providing a full explanation to the customer with details of the Housing Ombudsman Service
- liaising with the complaint manager to identify where a complainant is frivolous or vexatious and to refer to the Managing Unacceptable Behaviour Policy and process
- providing service areas with their complaint handling performance information and highlighting poor complaint handling performance to the Customer Resolution Manager or relevant head of service or higher level
- coordinating information requested by the Housing Ombudsman Service where complaints are being investigated
- work with key service areas to conduct complaint case review meetings for complex cases and ensure learnings are captured, document decisions and monitor actions to ensure delivery.
- ensuring all Housing Ombudsman Service and final stage complaints are minimised and managed effectively, providing advice in the management of complex complaints as and when required

**Team Leaders and Managers** are responsible for:

- investigating and leading on stage one complaints allocated to them for their own service area or independent of their service area
- work collaboratively with colleagues across the business to resolve complaints efficiently
- investigating complaints thoroughly, impartially, promptly, politely and fairly ensuring all matters raised are responded to
- acting sensitively, and consider each complaint on its own merit



- ensuring that customers and any staff member or team subject to the complaint are given the opportunity to set out their position before a final decision is made keeping customers regularly updated during complaint investigations and manage any expectations where a desired outcome is unreasonable.
- taking responsibility for setting out clear responses and offering appropriate remedies to resolve a complaint taking into account any distress and upset caused to the customer
- ensuring any outstanding actions following a complaint response are monitored and progressed within a timely manner and customers are kept informed
- ensuring our Customer Care Standards are considered when investigating complaints and applied in our responses
- minimising complaint escalations via thorough and fair investigation of stage one complaints
- ensuring that all notes including emails, letters, meeting minutes and phone calls related to the complaint are accurately recorded
- taking ownership of lessons learnt and liaising with the relevant teams to share feedback on failings identified and service improvements understanding trends identified via complaints and implementing actions to drive service improvements identified via complaints and wider customer feedback.
- adhering to all timescales set out within the Complaints Policy and process

**Managers in a senior position** are responsible for:

- investigating and leading on stage two complaints allocated to them for their own service area or independent of their service area
- where a complaint is regarding more than one service area be responsible for leading on the investigation and work collaboratively with colleagues across the business to resolve complaints efficiently
- investigating escalated stage two complaints thoroughly, fairly and impartially providing full responses and setting appropriate remedies to complaints at the required level
- acting sensitively, and consider each complaint on its own merit
- ensuring that customers and any staff member or team subject to the complaint are given the opportunity to set out their position before a final decision is made
- identifying and acknowledging where complaints have not been thoroughly investigated at stage one and addressing performance concerns
- Ensuring our Customer Care Standards are considered when investigating complaints and applied in our responses
- determining when a complaint has exhausted the complaints process and clearly communicating the next steps
- ensuring that all notes including emails, letters, meeting minutes and phone calls related to the complaint are accurately recorded
- taking ownership of lessons learnt and liaising with the relevant teams to share feedback on failings identified and service improvements
- leading a service improvement and customer focused complaints culture within the organisation that takes complaints seriously
- ensuring their teams are adhering to the Complaints Policy and process
- monitoring complaints for their service areas to ensure Key Performance Indicators are achieved
- driving continuous service improvements from trends and themes identified from complaints and wider customer feedback

**All Staff have responsibility to:**

- discuss matters with customers to distinguish between an initial enquiry or service requests and dissatisfaction about the service they have received

	<ul style="list-style-type: none"> <li>• resolving low level dissatisfaction that they can nip in the bud quickly and easily</li> <li>• offering the complaints process to customers who express concerns of dissatisfaction including where there are ongoing enquiries</li> <li>• allocating all formal complaints to the Customer Resolution Team</li> </ul>
<p><b>Monitoring / Reporting and Assurance Controls</b></p>	<p>External Key Performance Indicators (KPIs) are used to measure the effectiveness of this policy. These are:</p> <ul style="list-style-type: none"> <li>• all complaints logged and acknowledged in writing within 5 working days</li> <li>• all stage one complaints responded to in writing within 10 working days from acknowledgment date (unless there is a justified reason to extend by a further 10 working days)</li> <li>• all stage two complaints responded to in writing within 20 working days (unless there is a justified reason to extend by a further 10 working days)</li> <li>• all Housing Ombudsman’s request for information provided within 15 working days.</li> </ul> <p>To ensure effective management and learning from complaints we will:</p> <ul style="list-style-type: none"> <li>• train staff in successful complaint management and root cause analysis</li> <li>• maintain records of training</li> <li>• provide staff with complaint process guidance and template letters</li> <li>• have enhanced IT systems to allow the Customer Resolution Team to review all open complaints and monitor adherence to timescales – this will be done through a weekly summary report</li> <li>• auto reminders will be generated through the system and sent to complaint managers to ensure response timescales are met</li> <li>• have supporting dashboards that alert the Customer Resolution Team and senior managers where timescales are not being adhered to</li> <li>• use the weekly summary report to escalate non-adherence to service leads</li> <li>• ensure accessibility of dashboards are available for managers and services leads to monitor their team’s complaint management performance</li> <li>• have enhanced IT systems to capture outcomes and learnings</li> <li>• hold case review meetings following complex or serious complaints to ensure learnings and service improvements are made and document the decisions, actions and track the delivery</li> <li>• provide service leads and the business with in-depth quarterly reports and seek feedback on these to aid learning and influence service improvement action plans.</li> </ul> <p>Provide complaints management information in the format of:</p> <ul style="list-style-type: none"> <li>• quarterly reports provided to service managers detailing performance against KPI’s including non-adherence to complaint management and trends for their service areas to enable them to drive improved complaint handling performance, identify service improvement actions and take accountability for addressing non-adherence to the complaints process and implementing improvements</li> <li>• quarterly reports provided to Executive Board detailing performance against KPI’s, trends and service improvement actions to enable them to hold service areas to account, drive improved performance and ensure delivery of service improvements actions</li> <li>• quarterly reports provided to Amalgamated Board to highlight performance against KPI’s, Housing Ombudsman Service results (including timely compliance with any</li> </ul>

	<p>Housing Ombudsman orders) and actions taken to drive service improvement against trends to enable them to hold Paradigm to account</p> <ul style="list-style-type: none"> <li>• access to dashboard are provided to the Resident Services Panel (RSP) detailing quarterly performance against KPI's, trends and service improvement actions to enable the RSP to scrutinise performance and to challenge low performance</li> <li>• quarterly communication updates published to the business demonstrating complaints performance, volume of complaints, complaint trends and learnings via internal intranet and staff newsletters</li> <li>• quarterly communication updates published to customers promoting accessibility of the complaints process and demonstrating complaints performance, volume of complaints, complaint trends and learnings via the customer's newsletter</li> <li>• Annual Report to customers published via our website to include complaints performance, learnings and actions taken to improve service delivery (promotion of You Said, We Did)</li> <li>• annual Housing Ombudsman Service landlord performance report and self-assessment against the Housing Ombudsman Service's Complaints Handling Code.</li> </ul>
<b>Cross References</b>	<p>Remedies and Compensation Policy  Managing Unacceptable Behaviour Policy  Customer Care Standards</p>

<b>Policy Owner</b>	Executive Director – Customer
<b>Prepared by</b>	Customer Resolution Manager
<b>Approved by</b>	Amalgamated Board
<b>Date of Board approval</b>	July 2022
<b>Effective date</b>	July 2022
<b>Review date</b>	July 2025
<b>Version control</b>	V5 July 2022

## Record of Amendments

Date	Version	Approved By	Details of Amendments
November 2020	V3	Amalgamated Board	<p>Complaints Policy reviewed to take into account Housing Ombudsman's Complaint Handling Code which includes:</p> <ul style="list-style-type: none"> <li>• definition of complaints</li> <li>• timescales for acknowledging and responding to complaints</li> <li>• two stage process and removal of Appeals Panel as per recommendation of the Code</li> <li>• clarifying the complaints process</li> <li>• defining roles and responsibilities.</li> </ul>
May 2021	V4	Amalgamated Board	<p>Complaints Policy reviewed to take into account the internal advisory complaint audit (March 2021 report) which includes:</p> <ul style="list-style-type: none"> <li>• Confirmation of acknowledging social media complaints</li> <li>• Referencing gesture of goodwill</li> <li>• Narrative on informal complaints</li> <li>• Formal complaints process map</li> </ul>
July 2022	V5	Amalgamated Board	<p>Complaints Policy has been updated to take into account the Housing Ombudsman Services revised Complaint Handling Code which includes:</p> <ul style="list-style-type: none"> <li>• Informal complaints section has been removed</li> <li>• Details about how additional concerns raised during an open investigation will be included into the same open complaint investigation.</li> <li>• The timescales for when stage one and two complaints commence have been amended to start when complaints are formally acknowledged</li> <li>• Strengthened the roles and responsibilities section to reflect the requirements of the Code.</li> </ul> <p>Other updates include:</p> <ul style="list-style-type: none"> <li>• Reference to personal data breach and data protection legislation under what will not be treated as a complaint has been updated to remove. Letters before action has also been removed where an issue is, or has been, subject to legal proceedings involving Paradigm</li> <li>• Allocating complaints at stage two to senior managers</li> <li>• Updated the Policy to reflect the changes following the restructure in the Customer Directorate.</li> </ul>