

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Y	Complaint Policy section 4.0	Complaint For the purposes of this policy a complaint shall be defined as <i>an expression of dissatisfaction</i>, however made, about the standard of service, actions or lack of action by the organisation, its employees, or those acting on its behalf, affecting an individual customer or group of customers. The customer does not have to use the word complaint in order for it to be treated as such and any expression of dissatisfaction which cannot be promptly resolved to the satisfaction of the customer should be treated as a complaint.
1.3	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.	Y	Complaint Policy section 4.0, 5.2 & 5.3	As above plus 5.2 & 5.3; 5.2 Pivotal colleagues should be alert to customer dissatisfaction and aware that the customer does not have to use the word 'complaint' in order for it to be treated as such. 5.3 Where a service request cannot be reasonably and practicably resolved, it will become a complaint.

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.	Y	Complaint Policy section 4.0 & 20.3 and appendix 3	Pivotal wording: 4.0 Requests relating to service shortfalls (pre-complaint) – where this can be promptly addressed to the satisfaction of the customer, it is not a complaint (although it may become a complaint if not dealt with promptly). It is important to recognise the difference between a service shortfall and formal complaint. 20.3 Colleagues will be trained and supported to enable them to resolve pre-complaints expression of dissatisfaction with service shortfalls informally and promptly whenever possible. However, where this is not achieved and a matter is escalated, Pivotal will view complaints as valuable assets with the potential to inform service improvement and improve customer satisfaction. Appendix 3 details Housing ombudsman Service Request or Complaint – Flow chart
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.	Y	Complaints Policy section 7.1	It is Pivotal policy to offer a range of ways in which a customer can complain or give us a compliment as listed below. Internally (Residents): • In key working sessions. • To a Pivotal employee, Service Manager or to Head Office either verbally or in writing. • In a house meeting. • By email at complaints@compliments@pivotalhomes.co.uk • Via the Pivotal website at https://www.pivotalhomes.co.uk/

				A complaint must be raised when a 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.
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.	y	Complaints Policy section 22.2	Pivotal carries out annual customer surveys. These will include information about how customers can pursue service dissatisfaction as a complaint if they wish to do so. Whilst an expression of dissatisfaction with services made through a survey is not defined as a complaint, wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to do so.

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	Y	Complaint Policy section 5.1 & 6.2	5.1 Pivotal will accept a complaint unless there is a valid reason not to do so. If Pivotal does not accept a complaint, we will ensure full records evidencing our reasoning. Each complaint will be considered on its own merits. 6.2 On receipt of a complaint Pivotal cannot accept, we will respond in writing detailing the reasons for this. A Pivotal customer, or someone acting on their behalf, has the right to challenge our decision using the Housing Ombudsman service.
2.2	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:	Y	Complaints Policy section 6.1	6.1 Where the following instances arise, they will not be dealt with by Pivotal's Complaints Policy and Procedures: a) The issue/situation giving rise to the complaint occurred over

	• 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.			12 months ago (unless related to safeguarding or health and safety matters). b) The matter concerned is not the responsibility of Pivotal. c) Legal proceedings are pending or an insurance claim against us is being made. d) During disputes regarding service charge calculations. e) The complaint relates entirely to services or decisions outside of our control. f) An attempt is made to reopen/reconsider a previously concluded complaint where we have provided a final decision. g) Cases where a colleague wishes to raise a complaint against another colleague (these will be dealt with via
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				Pivotal's Whistleblowing and/or Grievance Policies as appropriate).
2.3	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.	Y	Complaint's Policy section 5.8 & 6.1 (a)	5.8 Pivotal 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 of this time limit where there is good reason to do so, considering the individual circumstances of each complaint. 6.1 (a) Where the following instances arise, they will not be dealt with by Pivotal's Complaints Policy and Procedures: a) The issue/situation giving rise to the complaint occurred over 12 months ago (unless related to safeguarding or health and safety matters).
2.4	If a landlord decides not to accept a complaint, an explanation must be	Y	Complaint's Policy section 6.2	On receipt of a complaint Pivotal cannot accept, we will

	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.			respond in writing detailing the reasons for this. A Pivotal customer, or someone acting on their behalf, has the right to challenge our decision using the Housing Ombudsman service.
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Y	Complaint's Policy section 5.1	Pivotal will accept a complaint unless there is a valid reason not to do so. If Pivotal does not accept a complaint, we will ensure full records evidencing our reasoning. Each complaint will be considered on its own merits.

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.	Y	Complaint Policy section 7.1, & 8.1 - 8.4	7.1 It is Pivotal policy to offer a range of ways in which a customer can complain or give us a compliment as listed below. Policy Complaints and Compliments Policy & Procedure Policy owner Housing Services Manager. Agreed by Senior Leadership Team Version 5.0 Issue date October 2025. Review date October 2026 Page 4 of 19 Internally (Customers): • In key working sessions. • To a Pivotal employee, Service Manager or to Head Office either verbally or in writing. • In a house meeting. • By email at complaintsandcompliments@pivotalhomes.co.uk • Via the Pivotal website at www.pivotalhomes.co.uk A complaint must be raised when a customer 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.

				External agencies or organisations, stakeholders and third-party individuals can make complaints to us in the following ways: • Verbally, in person. • Verbally, via the telephone. • In writing (by letter). • By email at complaintsandcompliments@pivotalhomes.co.uk • Via the Pivotal website at www.pivotalhomes.co.uk 8.1 Pivotal will comply with the following: • Equality Act 2010 • Housing Ombudsman Service Complaint Handling Code (and any findings or recommendations made) • Regulator of Social Housing's Consumer Standards • Data Protection Act 2018 • Localism Act 2011 8.2 Pivotal will always treat complainants fairly and have regard to reasonable adjustments required by customers making a complaint. Ensuring appropriate recording of disabilities along with any agreed reasonable adjustments on their occupancy file and will be reviewed during key work sessions and annual tenancy reviews. 8.3 Anyone expressing a difficulty communicating their complaint to us should ask for assistance.
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				8.4 Any colleague who is aware of a communication difficulty for a customer should offer them assistance or, if preferred by the complainant, signpost them to appropriate, impartial, external support.
3.2	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.	Y	Complaint Policy section 7.1	
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.	Y	Complaints Policy section 11.1	Pivotal colleagues should always take a positive approach to complaints, viewing them as an opportunity for service improvement (also see Appendix 1). High volumes of complaints are never viewed as a negative as they indicate our accessible complaints process offering us every opportunity to listen to our customers with the view to continual improvement to service delivery.
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	Y	Complaints Policy section 9.3	Heading of the policy details that the P&P is available in other languages and formats including Braille and Audio on request. 9.3 Where the above is not possible, Pivotal will always seek to resolve complaints as promptly as we can using the 2-stage process set out below. Pivotal will not refuse to escalate a complaint through all stages of the complaint procedure

	policy must also be published on the landlord's website.			unless we have valid reason to do so. Where this is the case, we will clearly set out these reasons in compliance with the Ombudsman Service Complaint Handling Code.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Y	Complaint's Policy section 21.4	Where the above is not possible, Pivotal will always seek to resolve complaints as promptly as we can using the 2-stage process set out below. Pivotal will not refuse to escalate a complaint through all stages of the complaint procedure unless we have valid reason to do so. Where this is the case, we will clearly set out these reasons in compliance with the Ombudsman Service Complaint Handling Code.
3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Y	Complaint's Policy section 8.5	A customer may assign a representative to deal with their complaint on their behalf. In these circumstances, and where it is reasonable and practical, the representative should accompany the complainant to any meetings.
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.	Y	Complaint's Policy section 16.1 & 16.2 and detailed on complaints response letters.	16.1 Complainants have the right to make a formal complaint to the Housing Ombudsman Service (HOS). The HOS may offer to mediate, arbitrate, reject the complaint or make recommendations to Pivotal on how it should address the complaint. 16.2 The HOS can be contacted eight weeks after the customer has received a final response following the Stage 2 process set out in this policy and procedures.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team 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.	Y	Complaint's Policy section 13.1	However; this section does not specify the person with responsibility for liaison with the Ombudsman
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.	Y	Complaint's Policy sections 13.1	The Assigned Manager will have access to colleagues at all levels to facilitate prompt resolution of complaints. The Assigned Manager has the authority and autonomy to act in order to resolve disputes 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	Y	Complaint's Policy sections 19.5 & 20.3	19.5 All customers and others affected by the activities of Pivotal are welcome to express satisfaction or appreciation about our services and we will use this feedback to support our learning and continuously improve our services.

				20.3 Colleagues will be trained and supported to enable them to resolve pre-complaint expressions of dissatisfaction with service shortfalls informally, and promptly whenever possible. However, where this is not achieved and a matter is escalated, Pivotal will view complaints as a valuable asset with the potential to inform service improvement and improve customer satisfaction.
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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.	Y	One policy & procedure for all	
5.2	The early and local resolution of issues	Y	Complaints Policy section 9.3	Explains 2 stage process

	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.			Where the above is not possible, Pivotal will always seek to resolve complaints as promptly as we can using the 2-stage process set out below. Pivotal will not refuse to escalate a complaint through all stages of the complaint procedure unless we have valid reason to do so. Where this is the case, we will clearly set out these reasons in compliance with the Ombudsman Service Complaint Handling Code.
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.	Y	As above	
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	Y	Added in SLA with third parties under Housing Management agreement for managing agents whereby Pivotal retains the overarching RP.	SLA PHA RP 11.2.2 (i) a) Providing and following Pivotal's a-clear Stage 1 complaints policy & procedure for the services carried out under this Agreement and advising Occupants of complaints procedures relating to services provided by the RP and complaints procedures relating to the support service provided with the Property. All stage 2

	complaints process set out in this Code. Residents must not be expected to go through two complaints processes.			complaints must be escalated to Pivotal Homes Group via the email address complaintsandcompliments@pivotalhomes.co.uk as soon as reasonably possible. & Pivotal and Qualitas SLA Section 11.22.2 (K)
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	SLA agreements	As per question 5.4 see above - Pivotal Housing ensure any third-party stage 2 complaints are handled by Senior Pivotal Staff ensuring quality control.
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”. If any aspect of the complaint is unclear, the resident must be	Y	Complaints Policy Sections 5.5 & 9.2 & 9.3	5.5 Pivotal will work with customers from the outset to ensure that we understand the outcome the customer would like and can manage expectations should that become unrealistic. 9.2 At the outset of the investigation, the investigating manager should: • establish the facts from the customer’s perspective and clarify with the customer the desired outcome; • identify from the customer, any further evidence or statements (from others) needed to fully consider the complaint; • take urgent action where it is clear that the situation described by the customer requires this (e.g., for health and safety reasons), making immediate recommendations to the Lead Officer for Health & Safety and informing the customer. 9.3 Where the above is not possible, Pivotal will always seek to resolve complaints as promptly as we can using the 2-stage process set out below. Pivotal will not refuse to escalate a complaint through all stages of the complaint procedure unless we have valid reason to do so. Where

	asked for clarification.			this is the case, we will clearly set out these reasons in compliance with the Ombudsman Service Complaint Handling Code. The assigned investigating Manager will; 1. Listen carefully to the complainant to achieve a clear understanding of the complaint and what they would like the outcome of their complaint to be, asking the complainant for clarification if any aspect of the complaint is unclear. (<i>see appendix 1</i>).
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.	Y	Complaint's Policy section 9.3	The assigned investigating Manager will; 1. Listen carefully to the complainant to achieve a clear understanding of the complaint and what they would like the outcome of their complaint to be, asking the complainant for clarification if any aspect of the complaint is unclear. (<i>see appendix 1</i>). 2. Be clear with the customer about their expectations from the outset and whether the desired outcome is unreasonable or unrealistic.
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	Y	Complaint's Policy section 9.3 & Appendix 1	Appendix 1 – Good practice for colleagues managing complaints

	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.			
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.	Y	Complaint's Policy section 9.3	Respond to the complainant no later than 10 working days from the date the organisation received the complaint. If this is not possible, discuss with the Head of Housing and, with their agreement, provide an explanation to the complainant and a date by when the Stage 1 response will be received. (The date provided must not exceed 20 days from the date the organisation acknowledged the complaint). 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 must still be tacked and actioned promptly with appropriate updates to the customer.
5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any	Y	Complaint's Policy section 8.1 & 8.2	8.0 Support for Customers 8.1 Pivotal will comply with the following: • Equality Act 2010 • Housing Ombudsman Service Complaint Handling Code (and any findings or recommendations made) • Regulator of Social Housing's Consumer Standards • Data Protection Act 2018

	reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.			• Localism Act 2011 8.2 Pivotal will always treat complainants fairly and have regard to reasonable adjustments required by customers making a complaint. Ensuring appropriate recording of disabilities along with any agreed reasonable adjustments on their occupancy file and will be reviewed during key work sessions and annual tenancy reviews.
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.	Y		Where the above is not possible, Pivotal will always seek to resolve complaints as promptly as we can using the 2-stage process set out below. Pivotal will not refuse to escalate a complaint through all stages of the complaint procedure unless we have valid reason to do so. Where this is the case, we will clearly set out these reasons in compliance with the Ombudsman Service Complaint Handling Code.
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must	Y		We record or complaints on a central register and store all information relating to the complaint including investigation details within a designated complaints folder for each individual complaint made.

	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.			
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.	Y	Complaints Policy section 8.6	The organisation has a compensation P&P as detailed in section 8.6 of the complaints policy.
5.14	Landlords must have policies and procedures in place for managing	Y	Complaints Policy section 12 & 25.1	25.1 12.0 Unacceptable behaviour 12.1 Pivotal understand that customers may feel upset or frustrated when making a complaint; however, there are some behaviours or actions that we consider unacceptable. These include: Policy Complaints

	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.		and Compliments Policy & Procedure Policy owner Housing Services Manager Agreed by Senior Leadership Team Version 5.0 Issue date October 2025 Review date October 2026 Page 9 of 19 • aggressive or abusive behaviour – examples include, but are not limited to threats, physical violence, personal verbal abuse, derogatory and discriminatory remarks, rudeness, inflammatory statements and unsubstantiated or malicious allegations; • unreasonable demands – examples include but are not limited to demanding responses within unreasonable timescales, refusing to speak to colleagues who can assist and/or insisting on speaking only to a particular colleague, repeatedly changing the substance of a complaint or raising unrelated concerns; • unreasonable persistence – examples include, but are not limited to, persistent refusal to accept decisions or explanations made in relation to a complaint, continuing to pursue a complaint without presenting any new information, making excessive and unwarranted contacts taking up disproportionate amount of colleague time and resources. 12.2 Pivotal will always seek to resolve a complaint and appreciate that complaint situations maybe frustrating for a customer. However, demonstration of these types of behaviours may result in a complaint not being investigated, escalated and/or any action being taken. 25.1 This policy and the procedures included in it will be reviewed annually by Pivotal’s Senior Leadership Team. Related Pivotal Policies: Grievance Policy and Procedure Whistle Blowing and Allegations Against Employee’s Policy Disciplinary and Appeals Policy
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				Safeguarding of Vulnerable Adults Policy Safeguarding Children Policy and Procedure Equality, Diversity and Inclusion Anti-Social Behaviour Policy & Procedure Vexatious Contact Management Policy & Procedure
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.	Y	As above	

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.	Y	Complaints P&P in entirety has a clear 2 stage process. Section 9.0 Appendix 1	Process clearly defined in our procedure. Resident vulnerabilities highlighted on main page of resident file on Pyramid computer systems. 9.1 Pivotal colleagues should always aim to achieve the earliest possible resolution of any service request. Resolving a service request in the early stages can often result in increased customer satisfaction and reduce complaints. Appendix 1 L. I. Where something is found to have gone wrong in respect of Pivotal's service, this should be acknowledged and an apology provided, along with remedial actions explaining what is

				being done to prevent it from happening again.
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>	Y	Complaint Policy section 9.3	All complaints are acknowledged within 5 working days with a 10-working day from acknowledgement resolution where possible. This is clearly defined on the central register but acknowledge
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Y	Complaints Policy section 9.3	This part is clearly explained within the complaints policy
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.	Y	Complaints Policy section 9.3	
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.	Y	Complaints Policy & Procedure is provided when complaint is acknowledged detailing contact details of Ombudsman. Standard extension letter template includes contact details of the Ombudsman.	This is clearly expressed within the standard complaint's response letters at each stage.

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 resident.	Y	Section 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 must still be tracked and actioned promptly with appropriate updates to the customer.
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.	Y	Complaint Policy section 11.2	11.2 All communications with a complainant should: a) use plain language appropriate to the needs of the complainant; b) ensure customers are regularly updated in line with the timeframes in this P&P; c) communicate responses on behalf of Pivotal and, where fault has occurred, take responsibility on behalf of the company, not in respect of individuals or contractors employed by the company; d) clearly address all points raised in the complaint; e) keep the complainant informed even when there is

				no new information to provide and ensure any extended timeframes are met; f) provide relevant, policy, legal and good practice-based reasons for Pivotal's decisions and details of remedial actions; g) give information on how to escalate the complaint if dissatisfied with an outcome.
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 the response, the new issues must be logged as a new complaint.	y	Complaints Policy Section 9.3 & 12.1	9.3 Additional Complaints Raised During Investigation • Where customers raise additional complaints during the course of an investigation, these must be incorporated into the Stage 1 response if they are related to the original issues. • If the Stage 1 response has already been issued, or if the new issues are unrelated to those already being investigated, or if including them would unreasonably delay the response, the new issues must be logged and

				managed as a separate complaint 12.1 Describes unreasonable demands such as 'repeatedly changing the substance of a complaint' but is not specific to new issues raised during a complaint.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: 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.	Y	Complaints Policy section 11.2, Appendix 1 and Template letters	11.2 All communications with a complainant should: a) use plain language appropriate to the needs of the complainant; b) ensure customers are regularly updated in line with the timeframes in this P&P; c) communicate responses on behalf of Pivotal and, where fault has occurred, take responsibility on behalf of the company, not in respect of individuals or contractors employed by the company; d) clearly address all points raised in the complaint; e) keep the complainant informed even when there is no new information to provide and ensure any extended timeframes are met;

				f) provide relevant, policy, legal and good practice-based reasons for Pivotal's decisions and details of remedial actions; g) give information on how to escalate the complaint if dissatisfied with an outcome.
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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.	Y	Complaints Policy section 9.3	If all or part of the complaint is not resolved to the customers satisfaction at Stage 1, it must be progressed to Stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.
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.	Y	Complaints Policy section 9.3	Stage 2 - Appeal 1. An appeal following the decision made in Stage 1 must be received by the Lead Officer no later than 10 working days after the complainant received the Stage 1 response and will be considered by an alternative appropriate manager either at

				the same level or above the Stage 1 assigned manager. 2. An appeal will be acknowledged within 5 working days of receiving it. 3. An appeal will be considered and fully responded to within 20 working days of date of receipt of appeal by the Stage 2 assigned manager, unless there is good reason for not responding within the timeframe. 4. Where a response within the timescale is not possible, a written explanation for this will be provided, together with the date by which a response will be received. 5. Customers are not required to explain their reasons for requesting a Stage 2 consideration. Pivotal will make all reasonable efforts to understand why a resident remains unhappy as part of its Stage 2 response. 6. The Stage 2 assigned manager response is final,
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				closes Stage 2 and ends the internal process.
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Y	Complaints Policy section 9.3	As above point 5
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Y	Complaints Policy section 9.3	As per question 6.11 point 1
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Y	Complaints Policy section 9.3	As per question 6.11 point 3
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.	Y	Complaints Policy section 9.3 14.2	As per question 6.11 - Section 9.3 points 3 & 4 14.2 In the event that Pivotal are unable to provide a response or resolution to complaints within the timescales set out in this policy and procedure, we will contact the complainant, clearly explain the reasons for the delay and agree an extension date of no more than an additional 10 working days. We shall also provide the Housing Ombudsman details

				to enable them to challenge our reasons for the delayed response.
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Y	Extension standard template letter includes this information.	
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.	Y	Complaints Policy section 9.3	
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.	Y	Complaints Policy section 11.2 & Appendix 1	
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; 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;	Y	Complaint standard response letters for both stage 1 & 2	11.2 All communications with a complainant should: a) use plain language appropriate to the needs of the complainant; b) ensure customers are regularly updated in line with the timeframes in this P&P; c) communicate responses on behalf of Pivotal and, where

	f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.			fault has occurred, take responsibility on behalf of the company, not in respect of individuals or contractors employed by the company; d) clearly address all points raised in the complaint; e) keep the complainant informed even when there is no new information to provide and ensure any extended timeframes are met; f) provide relevant, policy, legal and good practice-based reasons for Pivotal's decisions and details of remedial actions; g) give information on how to escalate the complaint if dissatisfied with an outcome.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Y	Complaints Policy section 9.3	The Stage 2 assigned manager response is final, closes Stage 2 and ends the internal process.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	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: • 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.	Y	Complaints Policy section 8.6 & Appendix 1	8.6 Compensation decisions will be made in line with Pivotal's Compensation Policy.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Y	Compensation Policy section 10.1 & 2 and 11.1 & 2	10.0 Discretionary payments 10.1 Where practical actions alone are unable to restore a customer to their position prior to a service failure, Pivotal may consider discretionary compensation. This will not always be

				financial and, in many instances, may be gestures such as: • a personal visit to apologise; • a letter of apology; • flowers; • a card. 10.2 When assessing discretionary payments, Pivotal will take into account the: i. Number of service failures the customer has experienced (each should be assessed separately). ii. Level of inconvenience caused to the customer, taking into account their personal circumstances. iii. Nature of the service failure. iv. Level of distress caused to the customer. v. Duration of the service failure. vi. Number of times the customer had to contact Pivotal before raising a formal complaint. 11.0 Complaints handling 11.1 Where there is evidence that a complaint has not been handled in accordance with
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				Pivotal's Complaints and Compliments Policy and Procedure, we may offer compensation. 11.2 Any offer of compensation in such cases will reflect the seriousness of deviation from the policy and the impact this has had on the customer and may include e.g.: • failure to record an expression of dissatisfaction as a complaint; • failure to escalate a complaint to the next stage of the process; • failing to keep customers updated during the duration of their complaint or a delayed response.
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.	Y	Compensation Policy	References; Legislation, regulation and guidance RSH Tenant Involvement and Empowerment Standard The Housing Act 1996 Data Protection Act 2018 Equality Act 2010 Housing Ombudsman's Guidance on Remedies, 2019 Health and Safety at Work Act 1974

				Equalities Act 2010 Related Policies & Procedures Health and Safety Policy (HA) Health and Safety supplementary documents Equality, Diversity and Inclusion Policy Housing Management Policy and Procedure ASB Policy and Procedures Complaints and Compliments Policy and Procedure Data Protection Policy
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Y	Compensation Policy	As above

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: 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.	Y	Annual complaints performance and service improvement report providing all information requests.	When submission was carried out.
8.2	The annual complaints performance and service improvement report must be	Y		Complaints performance service report issued on

	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.			Pivotal website but governing body's response to the report is not published alongside this.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	N/A	Charity acknowledges it understands the requirement of this provision.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	N/A	The Charity has not been asked to review and update the SA – but Charity understands the requirement of this provision	
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 residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	N/A	This has not happened but the Charity acknowledges and understands the requirement of this provision.	

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.	Y	Annual complaint's performance and service improvement report	Reflective practice is carried out throughout the year following completion of complaints and logged on a central register along with a review of performance annually.
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.	Y	Annual complaint's performance and service improvement report	Annual Operational team review
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.	Y	Annual complaint's performance and service improvement report	Central register is maintained and presented to the board on an annual basis.
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	Y	Complaints Policy section 5.1	CEO

	policies and procedures that require revision.			
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').	N		
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.	N		
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	N		

	related to severe maladministration findings; and d. annual complaints performance and service improvement report.			
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.	N		