

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 & 8.5	The policy sets out this requirement, confirms application in practice.

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, 5.0-5.4 & 20.3, 22.2 & 22.3 and appendix 3	The Policy distinguishes service request from complaints and recognises repeat unresolved requests. Confirm the operational system records, monitors and reviews service requests regularly. 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	The policy sets out this requirement and confirms application in practice.
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	Y	Complaints Policy section 23.2	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

	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.			made aware of how they can pursue a complaint if they wish to do so.
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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,	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). 6.2 On receipt of a complaint Pivotal cannot accept, we will respond in writing detailing the reasons for this. A Pivotal customer is someone acting on their behalf, has the right to challenge our decision using the Housing Ombudsman Service.
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 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.	Y	Complaint's Policy section 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.
2.5	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 & 5.8	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. 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. 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.
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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 5.2, 7.1 Stage 1 Procedure (10.3)	Sets out this requirement and confirms application in practice.
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 12.1	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 policy must also be published on the landlord's website.	Y	Complaints Policy, policy cover & section 10.3, Customer Handbook and via website publication.	The cover offers alternative formats and section 10. Sets out two stages. The current version, and timeframes are published in an accessible format on the website and within our Customer Handbook.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including	Y	Complaint's Policy section 17.1 – 17.2, 21.2, Customer Handbook & website	The policy provides Ombudsman details and says customers are told about the policy at sign-up. Details are on our website and our Customer

	information about the Ombudsman and this Code.			Handbook explain the code and access to the Ombudsman.
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 17.1 – 17.2 and detailed on complaints response letters.	Section 17.2 permits contact with the Ombudsman immediately after the stage 2 final response. Response letters explain the right to seek Ombudsman help during the process ensuring the process and availability of the ombudsman is promoted to the resident.

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 10.3 & 14.1	Designated Complaints Handler
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 14.1	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 12.1, 21.1 - 21.3	12.1 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. Section 21.1-21.3 details induction and training to support a positive culture of learning from complaints.
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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, sections 2.1, 5.1, 9.0 & 10.3	One policy and procedure for all inclusive of third party housing management arrangements.
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	Y	Complaints Policy sections 4.0, 9.0, 10.1 & 10.3	Explains 2 stage process 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.

	stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.			
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	The policy provides the relevant process and confirms implementation through complaint records and correspondence to residents.
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	Y	Added in SLA with third parties under Housing Management agreement for managing agents whereby Pivotal retains the overarching RP. Policy section 9.0	Third party management organisations must follow Pivotal's 2 stage process for complaints handling and provide Pivotal with sufficient information to enable it to meet its regulatory, governance and reporting responsibilities.

	complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Y	SLA agreements & Policy section 9.0.	As per question 5.4 see above - Pivotal Housing ensure any third-party stage 2 complaints are handled/monitored 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 asked for clarification.	Y	Complaints Policy Sections 5.5 & 10.2 - 10.3	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. 10.2 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. 10.3 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 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 10.3	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 to set out their position; c. take measures to address	Y	Complaint's Policy sections 10.2 - 10.3 & Appendix 1	Appendix 1 – Good practice for colleagues managing complaints

	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 10.3	Respond to the complainant no later than 10 working days from the date the organisation acknowledging 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 reasonable adjustments agreed, as well as a record of any disabilities a	Y	Complaint's Policy section 8.1 - 8.4	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 • Localism Act 2011 8.2 Pivotal will always treat complainants fairly and have regard to reasonable adjustments required by customers making a complaint.

	resident has disclosed. Any agreed reasonable adjustments must be kept under active review.			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. Examples of reasonable adjustments could include: • Easy read; • Large print; • Translation; • Interpreter; • Telephone instead of writing; • Advocate; • Longer response time where appropriate. 8.3 Anyone expressing a difficulty communicating their complaint to us should ask for assistance. 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.
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	Y	Complaints policy 10.3	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 this is the case, we will clearly set out these reasons in compliance with the Ombudsman Service Complaint Handling Code.

	set out in section 2 of this Code.			
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.	Y	Complaints Policy 14.1	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. See also complaints policy 14.1 All details of complaints must be logged at every stage of their progress; from the date they are accepted to their conclusion when outcome is recorded (included any appeal).
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	Y	Complaints Policy section 8.6	The organisation has a compensation P&P as detailed in section 8.6 of the complaints policy.

	of the complaints process without the need for escalation.			
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.	y	Complaints Policy section 13.1 – 13.2	Unreasonable behaviour will be logged on the complaints record and resident file logs with any restrictions added clearly to our systems for regular review. 13.1 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: • 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. Policy Complaints and Compliments Policy & Procedure Policy owner Housing Services Manager Agreed by Pivotal Housing Association Board Version 6.0 Issue date October 2026 Review date October 2027 Page 11 of 22 13.2 Unacceptable behaviour will not normally prevent a complaint from being investigated or progressed. Where restrictions on contact are necessary, they will be proportionate, reasonable and clearly explained,

				taking account of the Equality Act 2010 and any reasonable adjustments required. Restrictions will be recorded and kept under regular review.
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	Complaints policy section 13.2	13.2 Unacceptable behaviour will not normally prevent a complaint from being investigated or progressed. Where restrictions on contact are necessary, they will be proportionate, reasonable and clearly explained, taking account of the Equality Act 2010 and any reasonable adjustments required. Restrictions will be recorded and kept under regular review.

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 10.1- 10.3 & Appendix 1	Process clearly defined in our procedure. Resident vulnerabilities highlighted on main page of resident file on Pyramid computer systems. 10.1 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. Repeated service requests about the same issue may become complaints where the landlord has failed to resolve the matter. 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 10.3	A designated complaints handler will, within 5 working days of initial complaint; 1. Record the complaint on the Central Complaints Log. 2. Assign complaint to an appropriate Service Manager for investigation. Allocation of the Service Manager should be done with consideration for any actual or perceived conflict of interest. 3. Send acknowledgement letter with: a. Details of the investigating officer. b. Date full response is expected by (10 working days from acknowledging the receipt). c. Copy of the complaints P&P d. If no address; make contact via details provided to acknowledge complaint and obtain details to write out as per points a-c.

				e. Send a copy of the complaint and acknowledgement to the assigned Manager.
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 10.3 Stage 1	The assigned investigating Manager will; 5. Respond to the complainant no later than 10 working days from the date of acknowledgement. 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).
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	This is clearly expressed within the standard complaint's response letters at each stage.

			extension letter template includes contact details of the Ombudsman. Complaint policy section s 10.3 Stage 1 & 15.2	Policy 15.2; 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.
6.6	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 10.3	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	Y	Complaint Policy section 12.2	12.2 All communications with a complainant should: a) use plain language appropriate to the needs of the complainant

	relevant policy, law and good practice where appropriate.			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	Y	Complaints Policy Section 10.3	Additional Complaints Raised During Investigation • Where customers raise additional complaints during the course of an investigation, these must be incorporated into

	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.			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.
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: - the complaint stage; - the complaint definition; - the decision on the complaint; - the reasons for any decisions made; - the details of any remedy offered to put things right; - details of any outstanding actions; and - details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.	Y	Complaints Policy section 10.3 Stage 1, 12.2; Appendix 1 and Template letters	12.2 All communications with a complainant should: - use plain language appropriate to the needs of the complainant - ensure customers are regularly updated in line with the timeframes in this P&P; - 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; - 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 10.3 Stage 1 & 2	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 10.3 Stage 2	Stage 2 - Final Response 1. 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

				Pivotal's complaints procedure. Stage 2 is Pivotal's final response. 2. A request to escalate to Stage 2 will be acknowledged, defined and logged within 5 working days of receipt. 3. Customers are not required to explain their reasons for requesting Stage 2 consideration. Pivotal will make reasonable efforts to understand why the customer remains dissatisfied. 4. Stage 2 must be considered by a person who was not involved in the Stage 1 investigation. 5. Pivotal will provide the Stage 2 final response within 20 working days of the Stage 2 complaint being acknowledged. Where an extension is required, this will normally be no more than an additional 20 working days without good reason. The customer will be informed of the reason for the extension,
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				the revised response date and provided with the Housing Ombudsman Service contact details. 6. The Stage 2 response is Pivotal's final response and will explain how the customer can approach the Housing Ombudsman Service contact details if they remain dissatisfied.
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 10.3	As above point 3: 3. Customers are not required to explain their reasons for requesting Stage 2 consideration. Pivotal will make reasonable efforts to understand why the customer remains dissatisfied.
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 10.3	As per question 6.11 point 4: 4. Stage 2 must be considered by a person who was not involved in the Stage 1 investigation.

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 10.3	As per question 6.11 point 5: 5. Pivotal will provide the Stage 2 final response within 20 working days of the Stage 2 complaint being acknowledged. Where an extension is required, this will normally be no more than an additional 20 working days without good reason. The customer will be informed of the reason for the extension, the revised response date and provided with the Housing Ombudsman Service contact details.
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 10.3 Stage 2 (5) and 15.2	As per question 6.11 - Section 10.3 points 5 15.2 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. Complaints policy section 10.3 Stage 2 (5) & 15.2	15.2 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.
6.17	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 10.3 Stage 1.	6. 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.
6.18	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 12.2 & Appendix 1	All communication will be logged within our complaints log and on relevant resident files. 12.2 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.
6.19	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; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Y	Complaint standard response letters for both stage 1 & 2 Complaints policy sections 10.3 Stage 2(6) & 12.2.	12.2 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.
6.20	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 10.3 Stage 2 (1), (4) – (6)	1. 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 Pivotal's complaints procedure. Stage 2 is Pivotal's final response. 4. Stage 2 must be considered by a person who was not involved in the Stage 1 investigation. 5. Pivotal will provide the Stage 2 final response within 20 working days of the Stage 2 complaint being acknowledged. Where an extension is required, this will normally be no more than an additional 20 working days without good reason. The customer will be informed of

				the reason for the extension, the revised response date and provided with the Housing Ombudsman Service contact details. 6. The Stage 2 response is Pivotal's final response and will explain how the customer can approach the Housing Ombudsman Service contact details if they remain dissatisfied.
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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;	Y	Complaints Policy section 5.6, 8.6, 12.2 & Appendix 1	5.6 Where something has gone wrong, Pivotal will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. When taking remedial action, we will ensure that no unfairness or detriment results for other customers.

	• 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.			8.6 Compensation decisions will be made in line with Pivotal's Compensation Policy and may include: • Apology; • Practical remedy; • Reimbursement; • Discretionary compensation. Appendix 1 – Good practice for colleagues managing complaints.
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 Complaints policy section 8.6 (see above 7.3)	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 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
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				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 Complaints policy section s 5.6 & 10.3 Stage 1 (6).	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 Complaints 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. Complaints and Compliments Policy sections 22.3 - 22.4 & 23.4 - 23.5	Pivotal training provided to third party providers to enable consistent complaints handling approach across the business. Additional training delivered to Ezzi Lettings August 2026. The Policy provides KPI reporting, annual website reporting and audit.
8.2	The annual complaints performance and service improvement report must be	Y	Complaints policy sections 22.4 – 22.5, annual report and website.	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 alongside the governing body's response to the report.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Y	Charity acknowledges it understands the requirement of this provision. Section 25.1	Police updated October 2026 The Policy is reviewed annually by Housing Services Manager and Pivotal's Senior Leadership Team.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Y	Complaints policy section 25.1.	25.1 This policy and the procedures included in it will be reviewed annually by Pivotal's Senior Leadership Team.
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.	Y	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. Complaints Policy sections 23.1, 23.4 – 24.5	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 Complaints Policy sections 12.1, 22.1, 23.1 -23.5	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 Complaints Policy sections 22.1 & 23.5	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 sections 22.1 & 23.5	Lead person – Jean Curd, Non-Executive Director with Pivotal Housing.

	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').	Y	Complaints Police section 22.3 & 23.5	The Lead Officer will continually monitor and review overall management of complaints and compliments. Pivotal Boards receive a quarterly report on complaints and compliments including trends and lessons learned undertaken by the lead officer sent to the Senior leadership team.
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.	Y	As for question 9.5	
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;	Y	As for question 9.5	

	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; 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.	Y	Complaints Policy Appendix 1	Staff responding to complaints have received further training via 'Big Picture Training' to ensure these standard objectives are adhered to. This training is also extended to third party management organisations to ensure consistency across all areas.