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1. Purpose and scope

Pinnacle Group's Complaints Procedure sets our approach to managing customer complaints in accordance with the Housing Ombudsman's Complaint Handling Code and where appropriate, our statutory and legal duties.

This policy applies to:

- Affordable and Social Housing residents living in properties owned or managed by Pinnacle Group.
- People and organisations not receiving a service from Pinnacle Group, such as former tenants, a neighbour of a Pinnacle resident or organisations that are affected by Pinnacle's operations, contractors, other tenants or service users, commercial or sub commercial leaseholders.

The use of the term 'customer' in this procedure includes tenants and homeowners living in rented, shared ownership, leasehold or freehold properties. It also includes people who have applied for housing, receive support or other services from Pinnacle Group.

This procedure should be read in conjunction with the Complaints Policy and Compensation Policy.

Pinnacle Group is committed to ensuring that our working practices and services meet the needs of all our customers, and particularly for those with disabilities or those with temporary or short-term conditions who might otherwise be disadvantaged. In meeting this key business objective, we will make reasonable adjustments to our services. These may include alterations to premises, amendments to policies and procedures or provision of alternative means of communication methods to suit individual needs. In all instances we will seek to ensure that our services can be accessed by all customers with disabilities, as well as those who do not.

Pinnacle Group acknowledges its duties under the Equality Act 2010 (the Act). Whilst the Act does not define what is a 'reasonable adjustment,' the Equality and Human Rights Commission recommends consideration of the following factors in determining what is 'reasonable':

- How effective the adjustment will be in avoiding the disadvantage the customer would otherwise experience
- The practicality of the adjustments
- The extent of any disruption the adjustments might cause
- The financial and other costs of making the adjustment
- The amount resources already in place
- The availability of financial support or other assistance

Where Pinnacle Group is notified of a condition or situation disadvantaging a customer, or other household members, we will seek to make reasonable adjustments to delivery of services. Pinnacle Group will review each case based on the facts presented and in full consideration of Pinnacle Group's Vulnerability Policy and Aids and Adaptations Policy.

Pinnacle Group will not make assumptions about customer requirements for reasonable adjustments or what those adjustments might be. Pinnacle Group will endeavour to agree and deliver adjustments in a reasonable and mutually agreeable timescale. However, in specific circumstances there may be a delay whilst specialist advice is obtained. Where this is the case Pinnacle Group will keep customer updated on progress.

2. Key controls

By publishing this procedure, we aim to ensure compliance with the operational key controls. A key control is one that is fundamental to the system of internal control. All staff and managers are responsible for ensuring compliance with the key controls:

No.	Complaints Procedure Key Controls
1	Capture and record all complaints
2	Respond to complaints within target times
3	Ensure learning from complaints informs service development
4	Ensure residents kept informed throughout the process

3. Responsibilities and officer key controls

The responsible officer and their responsibilities under this procedure are detailed below:

Responsible Person(s)	Responsibilities	Key Control
Complaints Manager	Owns the policy, procedure and process which supports an effective complaints resolution service. Ensures there is a consistent approach to the interpretation of the procedure across Pinnacle Group and aim to improve customer satisfaction levels. Oversees the effective use of systems and data to enable performance monitoring and reporting. Owns the relationship with the Housing Ombudsman Service and is responsible for pursuing positive resolutions and minimising the operational risk to Pinnacle Group.	1, 2, 3, 4
Complaint Manager and Heads of Service	Evaluating responses for Stage 2 complaints upon request. Leading and owning escalations to ensure a prompt response.	1, 2, 3, 4
Complaints Manager, Service Improvement Manager and Heads of Service	Reviewing lessons learnt and undertaking service improvements for their areas, covering both quality and effectiveness. Supporting the requirements following Housing Ombudsman Determinations and ensuring any orders made are delivered.	1, 2, 3, 4
Complaints Manager and Head of Services	Managing, motivating and supporting Complaints Officers and Operation staff to ensure complaints are dealt with, advising on more complex cases and performance management of complaints in their area. Reviewing escalation of complaints to Stage 2	1, 2, 3, 4
Complaints Officer and Operational Staff	Delivering and responding to complaints within SLA ensuring that we demonstrate a fair, reasonable and ensuring we put things right for our customers.	1, 2, 3, 4

Complaints Co-ordinator's and other front-line staff	Ensuring Stage 1 complaints are captured and recorded and delivered to the correct team	1, 2
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4. Regulatory code and legal framework

As a subscribing landlord member of the Housing Ombudsman Scheme, we are required to comply with the Housing Ombudsman's Complaint Handling Code. This policy and its associated procedure are written to support our compliance with the Code. We publish our self-assessment against the Code to our customers and stakeholders on our website.

The Transparency, Influence and Accountability Standard of the Regulatory framework for social housing in England requires that landlords have a clear, simple and accessible approach which ensures complaints are resolved promptly, politely and fairly.

The Secure Tenants of Housing Authorities (Right to Repair) Regulations 1994 entitles secure tenants of local housing authorities to have qualifying repairs carried out at their landlord's expense and receive compensation from their landlord if qualifying repairs are not carried out within a prescribed period.

The most important legislation and national standards/guidance that currently govern registered provider policy and practice are:

- Housing Ombudsman's Complaint Handling Code (Effective from 1 April 2024)
- Social Housing (Regulation) Act 2023
- Regulator of Social Housing's Transparency, Influence and Accountability Standard (Effective from 1 April 2024)
- Housing Act 1985, 1988, 1996 (Schedule 2)
- Equality Act 2010
- Data Protection Act 2018 (DPA 2018)
- The Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019

5. Definitions

Complaints

We use the Housing Ombudsman's definition of a complaint as:

'An expression of dissatisfaction, however made, about the standard of service, actions or lack of action by Pinnacle Group, our staff, or those acting on our behalf, affecting an individual resident or group of residents.'

A customer does not have to use the word "complaint" for it to be treated as such.

If we decide not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Housing

Ombudsman. If the Housing Ombudsman does not agree that the exclusion has been fairly applied, the Housing Ombudsman may tell us to take on the complaint.

Service requests

If a customer is raising an issue for the first time, we will record this as a service request and follow the relevant policy and procedure. We will distinguish between a service request, survey feedback and a complaint about a service and take appropriate steps to resolve issues for residents as early as possible. This policy relates to complaints about services. Service requests and enquiries can become complaints if we fail to deal with the initial request appropriately.

Some service requests are often confused with complaints. Some examples of what would and wouldn't be a service request include:

- A customer calls to complain about a leaky tap. We will manage this as a service request and follow the appropriate steps to get the tap fixed by raising a repair works order. This will not be recorded or managed as a complaint.

It will become a complaint when we have failed to fix the tap despite numerous visits.

- A customer calls us to complain about a noisy neighbour. We will manage this as a service request by supporting the resident to report this as antisocial behaviour (ASB) and guiding them on the appropriate steps to address the issue. We will raise this as an ASB enquiry. This will not be recorded or managed as a complaint.

It will become a complaint when despite reports being made about ASB the customer feels that we are not managing the case well or we have failed to keep in contact with them.

- A customer calls us to complain about a missed appointment. We will manage this as a service request by booking a new appointment at a time suitable for the customer. This will not be recorded or managed as a complaint.

It will become a complaint when we have failed to attend multiple appointments, and the problem has not been resolved.

- A customer calls to query the level of service charge/rent, or they have a query about the charges. We will manage this as a service request in the first instance and will raise an enquiry to the service charge/rent team to respond to the customer.

It will become a complaint when we have failed to respond to you within the agreed period of time and you have received no communication.

We will always investigate and pay close attention to what a customer wishes us to do and explain carefully if we are not able to agree.

Compensation

We define compensation as a payment, either obligatory or discretionary, in recognition of loss suffered by a customer. There is no automatic trigger for a compensation payment, and each case will be considered on its merits. Where an award of compensation has been made, we expect this to be claimed within 12 months.

6. Exclusions from this policy

There are examples of exclusions from this policy where we may not consider a complaint. These examples are set out in the table below, together with the evidence we would use to make sure our decision is reasonable:

No.	Exclusion example	Evidence considered
1	The first request for a service or for information. For example, a request for an explanation of a service charge. This will be investigated following our service charge investigation procedure in the first instance.	We would rely on evidence as to whether it is the first time you have brought the concern to our attention, or you're requesting information or raising a question about a service.
2	Enquiries about the level of rent or service charge or the amount of rent or service charges increase will not be treated as a complaint unless there is evidence of service failure, like an error, delay or poor communication. Enquiries will be investigated fully through our rent and service charge enquiry process.	If a customer is unhappy with how we handle the initial enquiry about rent or service charge increases, we would rely on evidence of an error, delay or poor communication before accepting it as a complaint.
3	Where matters have already been considered under the complaints policy.	We would satisfy ourselves a complete and fair response had already been provided.
4	We may decline to investigate a complaint about a specific incident or service failure that occurred over 12 months prior to the complaint being made. Discretion will be used, particularly if there is evidence of a long-standing or continuing problem. Complaints should be relevant to current and recent issue.	We would rely on evidence of an unreasonable delay before the complaint was lodged.
5	A complaint about the conduct and behaviour of another customer, such as a neighbour dispute. This would be dealt with under our Housing Management policies.	We would rely on the evidence of report made to demonstrate this is best dealt with under our separate policy and procedure for the management of Anti-Social Behaviour.
6	We may decline to investigate a complaint where it is being pursued in an unreasonable manner including frivolous or vexatious complaints.	Where action is being taken under our unreasonable behaviour policy and procedure we may decline to investigate a complaint.
7	Where legal action is in progress, as the legal action supersedes the complaint.	We would rely on evidence to show where matters are or have been subject to legal proceedings, the customer has or had the opportunity to raise the subject matter of the complaint as part of those proceedings.
8	Insurance claims, as these will be dealt with separately under our Insurance policy.	We will ensure a complaint receives a response and decision, but where there is a personal injury or a

		legal claim, we will advise the customer of their rights to make a claim and how to progress this.
9	Pinnacle Group's policies and procedures	We would rely on evidence that supports non-compliance with our policy and procedures. We will not accept complaints relating to our policies where it is appropriate best practice. For example, fencing or re-housing etc.

7. Who can complain?

The following people can log a complaint under this policy and where appropriate, escalate it through both stages of our complaints procedure:

- Any Pinnacle Group resident
- Anyone who receives a service from Pinnacle Group or has applied for a service from Pinnacle Group.

Customers are welcome to make a complaint via an advocate. An advocate or third party could be a friend, relative, or an advocacy service such as the Citizens Advice Bureau. Where a complaint is made via an advocate, we'll obtain the customer's written consent, and it is our decision whether to accept the advocate. Where correspondence is received on behalf of a customer from a Councilor, MP, or Advocacy Service, consent will be assumed.

If we decide not to accept a complaint, an explanation will be provided to the customer setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Housing Ombudsman. If the Housing Ombudsman does not agree that the exclusion has been fairly applied, the Housing Ombudsman may tell us to take on the complaint.

We may decline to investigate a complaint about a specific incident or service failure that occurred over 12 months prior to the complaint being made. We encourage complainants to ensure a complaint is lodged within a reasonable period. Discretion will be used, particularly if there is evidence of a long-standing or continuing problem.

We are not able to investigate complaints about services, organisations and individuals for which Pinnacle Group is not responsible.

8. Making a complaint

We will make sure our customers can easily make a complaint without restriction.

Complaints can be made in person, by telephone, letter, e-mail, face to face, online using the tenancy app (ARK), via a member of staff or third-party organisation acting on our behalf.

Making a complaint will not have an adverse effect on any other services that a customer receives from us.

It is our policy to let customers know about their right to access the Housing Ombudsman Service, including for advice and guidance, at the outset and throughout the handling of their complaint. We will routinely signpost the Housing Ombudsman Service when we provide our complaint responses to our customers.

We always seek to remove barriers that prevent customers from complaining because English is not their first language; have poor literacy or communication skills; or they have a disability that makes communication difficult.

9. Stages of the Complaints Process

There are two stages to our complaints process, we aim to provide our service to the following timescales:

Complaint Stage	Timescale
Formal acknowledgement from a Complaints Officer	5 working days
Stage 1 response following formal acknowledgement	10 working days
Stage 2 review and formal acknowledgement from a Complaints Officer	5 working days
Stage 2 response following formal acknowledgement	20 working days

Stage 1 complaint investigation: All complaints logged are opened at Stage 1 of our procedure.

Stage 1 complaints are managed by a Complaints Officer who will work with colleagues to resolve problems swiftly and to provide our response to the complaint. Our Complaints Officer will act as the advocate for the customer: they'll work together to understand the complaint and how the customer wishes us to put things right; they'll provide any updates and the final decision will come from them.

The Complaints Officer will provide formal acknowledgement to the customer within five working days. We aim to respond to Stage 1 complaint cases within ten working days (two weeks) after sending the acknowledgement of the complaint. In some cases, it may not be possible to provide a response in this time scale. If we need extra time to complete the investigation, we'll explain this to the customer and give a date for our response. This will be no later than a further ten working days.

Our complaint response can include follow-on actions. We'll commit to these agreed actions being carried out within a reasonable period beyond the ten days we set out to provide our decision. These commitments will be scheduled in the most helpful way, which gives a reasonable amount of time for successful completion. Proposed actions, timescales and responsible people will be set out in our complaint response.

Stage 2 complaint (escalation): If the customer is not satisfied with our response at Stage 1, they can ask for their complaint to be escalated to Stage 2 of our process. In most cases, we'll agree to look again at our decision and to consider any additional information provided.

There are circumstances in which we won't be able to do this, for example, where our decision is based on published service standards and policy. If we've agreed to carry out a non-urgent repair within our published timescale for repairs, we will not accept a complaint about the time taken to schedule such a repair.

We will not agree to escalate a complaint to Stage 2 where we've agreed the complaint has been upheld but the customer has requested an increase in compensation offered. This will be dealt with as a compensation review within the Stage 1 resolution discussion.

The Stage 2 complaint is the final stage of our complaints process. We'll give customers our decision on the review of their complaint within twenty working days (four weeks). In exceptional circumstances, we may take up to a further ten twenty working days to conclude the review. If this is likely, we will tell the customer as soon as possible and give a date for the decision.

A complaint response will include our review of what has happened, our decision about the complaint and details of next steps. In many cases, the next steps will include commitments to actions which will happen in the period ahead. This may include follow-on repairs, separate investigations or customer meetings, which may require a reasonable amount of time to be completed. These commitments, which fall outside our complaint's response times, will be managed separately to the complaint process by the investigating manager(s).

10. Stage 1 (Full Investigation)

These are complaints that require an investigation. They are responded to by a Complaints Officer or relevant Operational Team.

All Stage 1 complaints must be recorded in our case management system.

All complaint cases raised by our customers or staff will be verified prior to acceptance to ensure it is not an exclusion and that it is not a first request for service. We will also check the case management system to ensure that a current complaint about the same issue does not exist.

Where a complaint has been raised by a customer or a member of staff that is not defined as a complaint but a first request for service, we will always communicate with the customer to confirm this and advise them of the steps we have taken to ensure that their enquiry is responded too.

When a complaint is made it must be acknowledged and logged within 5 working days.

The Complaints Officer will:

- Deal with complaints on their merits, act independently, and have an open mind;
- Give the resident a fair chance to set out their position;
- Take measures to address any actual or perceived conflict of interest and consider all relevant information and evidence carefully.

The Complaints Officer must investigate and respond to the complaint as soon as is practical, and certainly no later than ten working days. Any Stage 1 complaint open for more than ten working days must be extended in agreement with the customer. A clear explanation for the reason for the extension must be provided to the customer. The customer has the right to escalate their complaint to the Housing Ombudsman if they are unhappy with this extension.

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 or the matter does not link to what is being investigated, the new issues must be logged as a new complaint.

A complaint response will include our review of what has happened, our decision about the complaint and details of next steps. In many cases, the next steps will include commitments to actions which will happen in the period ahead. This may include follow-on repairs, separate investigations or customer meetings, which may require a reasonable amount of time to be completed. These commitments, which fall outside our complaints response times, will be managed separately to the complaint process by the investigating manager(s).

Our response to the customer at Stage 1 will confirm:

- 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;
- The 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.

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.

Any learning points from the complaint should be recorded. Any specific recommendation should be logged and tracked. Where a planned service improvement will address the cause of the complaint, this should be noted.

11. Stage 2 (Escalation)

If the customer is dissatisfied with the outcome of the Stage 1 response, they can request for their complaint to be reviewed at Stage 2 of the complaint process.

A Complaints Manager in liaison with the Head of Service or Director will complete the Stage 2 review and investigation. The Stage 2 review must be responded to as soon as is practical, and certainly no later than twenty working days.

The Stage 2 review should not be a repeat of the full investigation carried out at Stage 1. It is a review which should respond to the customer's reasons for requesting an escalation. The Complaints Manager, Head of Service or Director should satisfy themselves that our response:

- Demonstrates empathy and provides an apology, as appropriate
- Fully responds to each point raised by the customer
- Represents a logical response informed by evidence
- Is clear, concise and follows current communications guidelines

The complaint response should include details of the findings of the review and proposals to put things right, including any compensation offered. Any actions required to resolve the customer concerns should be raised as commitments within the case management system and assigned to the team responsible.

We will confirm the following in writing to the customer at the completion of Stage 2 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 the Ombudsman Service if the individual remains dissatisfied.

When we give our decision about a complaint, we will inform the customer whether the case is 'upheld, partially upheld or not upheld'. We will offer an opportunity for the customer to comment on the findings and set out their position.

Any learning points from the complaint should be recorded. Any specific recommendation should be logged and tracked which can be monitored. Where a planned service improvement will address the cause of the complaint, this should be noted.

12. Complaints about the conduct of staff

Under this policy and procedure, all straightforward complaints about staff conduct which relate to customer dissatisfaction about customer care or standards of behaviour or conduct are raised as a Stage 1 complaint in the case management system.

A Stage 1 complaint will be raised and assigned to the line manager responsible for the individual member of staff through the case management system. Any actions taken against the individual member of staff will not be captured within the complaint response.

The manager will discuss the complaint with the customer. They will seek to resolve the issue by offering an apology and reassuring the customer they will speak to the team member.

The manager will emphasise our commitment to customer care and listening to customer feedback. The manager will update the case in the case management system and send a formal response back to the customer. This should not be held on the case file but saved in a secure location.

13. Putting things right

Where something has gone wrong, we must acknowledge this and set out the actions we have taken or intend to take to put things right. These can include, but are not limited to:

- 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 financial remedy;
- Changing policies, procedures or practices.

Any remedy we offer will reflect the impact on the resident as a result of any fault identified. We will also clearly set out what will happen and by when.

14. Compensation

Compensation payments may be paid at the discretion of the Complaints Manager, Head of Service and in consultation with Clients, in line with this policy and reflecting the circumstances of each case. The Complaints Manager will support the investigating manager with policy guidance.

Compensation payments may be offered where:

- We have failed to deliver a service to the advertised standard
- In recognition of the time and trouble taken by the customer to make their complaint
- In recognition of distress and inconvenience experienced by the customer
- To reflect where a customer has suffered a loss because of a service failure by us

Compensation payments to our customers are used to offset rent or other arrears in the first instance where it is not a determination made by the Housing Ombudsman.

Our complaints procedure is our opportunity to understand what a customer is telling us has gone wrong. It is our responsibility to explain our services and, if necessary, to put things right for the customer.

It is important we are certain there is nothing further we can do before we decide the complaint procedure has reached an end.

At each stage, the customer must be contacted and informed the case is closed or is being escalated to the next stage. The case must be closed on the case management system once the commitment has been resolved.

Where we are unable to contact the customer or they have not engaged with us, we will write to them to confirm that their case will be closed as we are unable to investigate based on the information provided when the complaint was raised.

On occasion we will contact a customer to complete the acknowledgement, and they will advise us that they no longer wish to pursue their complaint, we will document the decision and close the case in these scenarios.

After we have provided our response, we will track all commitments made. In most cases, this will relate to follow-on repairs scheduled to be completed in the near future. The service area responsible for the commitments are accountable for making sure there is a successful delivery of all actions.

Any compensation payments must be recorded on the case management system, in line with our Compensation Procedure.

If a Stage 1 complaint is concluded and the customer agrees it is resolved satisfactorily, and there are no outstanding actions the case can be closed in the case management system.

15. Learning from complaints

Learning from complaints is fundamental to the service we deliver; we use the complaints we receive as an insight into how we are delivering to identify issues and bring about positive change.

The Complaints Manager leads on feeding through themes and trends as part of the monthly report to senior managers.

Where changes are agreed, the service area lead will take ownership for delivering these which are tracked through to completion.

We share learning, themes and outcomes of determinations made by the Housing Ombudsman with our Board Complaint Champion to identify other areas of focus, these feed through to the relevant Directors and Head of Service.

We hold regular monthly sessions with the Complaints Officers to identify lessons learnt and identify next best steps to take forward.

16. Taking a complaint to the Housing Ombudsman

The Housing Ombudsman Service can provide advice and support to customers throughout the life of a complaint. If the complaint remains unresolved at the end of the complaint process, customers can contact them to request a review.

When the Housing Ombudsman requests information on a complaint case, it is the responsibility of the service area and the Complaints Team to ensure this is provided promptly, is complete and clearly sets out the history of the complaint.

The Complaints Officer or Operation staff are responsible for ensuring all evidence relevant to supporting the decision made is saved on the case management system. The service area responsible for the service the complaint is about is accountable for providing any additional information prior to the matter becoming a complaint in terms of contact and actions undertaken to resolve the customer issue.

The Complaints Manager manages the relationship with the Housing Ombudsman Service. They will attend regular liaison meetings and ensure we benefit from training and good practice opportunities.

17. Complaints made to the Chief Executive or Group Leadership Team

Correspondence sent to the Chief Executive or our Pinnacle Group Leadership Team about an issue will be investigated as a new complaint by the Complaints Team.

If the complaint or enquiry is received by a member of the Group Leadership Team it will be sent to the Complaints Team to be raised in our case management system.

The case will be created in the case management system. The complaint will be managed in the same way as Stage 1 complaints as set out above.

18. Enquiries made by an MP or Councillor

Enquiries made by an MP or Councillor can be made through a variety of routes such as to the Chief Executive, members of staff and customer services. Enquiries of this nature will be reviewed and logged in line with the complaints procedure and Housing Ombudsman Complaint Handling timeframes.

It is important MP or Councilor enquiries are responded to promptly with the latest case information. Where a complaint has been raised, we will thank the MP or Councilor for the information and inform them that we will investigate it as a complaint and liaise directly with the customer, the case will then be resolved with the MP or Councilor.

19. Unreasonable Behaviour

We recognise problems with service delivery can lead to frustration and can make customers frustrated. Nevertheless, we expect customers to act reasonably when we respond to their complaint. We would not expect customers to:

- Threaten, verbally abuse or attack our staff
- Make approaches to several members of staff at the same time about the same issue

If we believe a customer is acting unreasonably, we will follow our Unreasonable Behaviour procedure.

We will always offer the customer the opportunity to set out their view of the circumstances.

Please see Unreasonable Behaviour procedure for more details.

20. Key Performance Information (KPIs), Monitoring & Evaluation

Performance is reviewed monthly through KPIs and management information that can be scrutinised and actioned from Board level to individual team level.

The KPIs within, are aligned the Housing Ombudsman code.

The Complaints Manager will monitor this procedure to ensure there is consistency across the group. Feedback will be provided through operational management teams.

Complaint handling will be measured using the results of the customer satisfaction survey which is reported monthly. We also report on complaint volumes, compliance against code requirements, Housing Ombudsman cases and Housing Ombudsman determinations.

The Complaints Policy and Procedure will be reviewed as a minimum every three years or in response to future regulatory or operational changes.

21. Zero Tolerance

Pinnacle Group will ensure any threats of violence and or aggression towards our colleagues and contractors are met with zero tolerance. We will not tolerate any threats, abuse, aggression, discriminatory behaviour, or violence towards our colleagues and contractors. If a person behaves in this way towards those working for or on behalf of Pinnacle Group, we will take immediate action, which may also include a legal remedy. Perpetrators may be:

- Reported to the police
- Limited to specific channels for communicating with us
- Banned from attending Pinnacle Group premises, or
- Have services temporarily withdrawn while we put measures in place to protect colleagues and contractors

22. Diversity and Inclusion

Pinnacle Group will treat all customers with fairness and respect. We recognise that we have an ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

This policy and any related documents may be translated or interpreted; or provided in accessible formats, as necessary. Further information can be found in Pinnacle Group's Communicating in Accessible Formats Policy Statement and Staff User Guide.

23. Associated Policies and Procedures

- Complaints Procedure
- Compensation Procedure
- Vulnerable Residents Policy
- Reasonable Adjustment Policy
- Data Protection Policy and Procedures
- Unreasonable Behaviour Policy
- Anti-social Behaviour Policy and Procedures