



# Complaints Policy

<b>Document Control</b>	
Document Title	<b>Complaints Policy</b>
Author	Cindy Gleghorn
Version	V9a
Release Date	May 2024
Next Review Date	May 2027
Document Type	Policy
Approved By	Board

## POLICY SUMMARY

EPIC aims to be a good landlord. The aim of this policy is to ensure that EPIC has an approach to complaints that is clear, simple, and accessible. By proactively listening to our tenants and dealing with complaints about our services, we can make improvements based on the feedback from our tenants. This also allows us to manage, respond and learn from complaints.

We aim to resolve all complaints promptly, politely, and fairly in line with the appropriate standards set by the Housing Ombudsman's Complaint Handling Code and the requirements of the Regulator for Social Housing.

This policy sets out clear processes and time limits to help our tenants understand how we will investigate their complaint and how we will respond to them.

We have developed this policy in line with the dispute resolution principles recommended by the Housing Ombudsman.

## 1. APPLICABILITY

The Policy applies to all members of staff, including but not limited to:

- All full-time, part-time, and temporary staff employed by or working for or on behalf of EPIC.
- Volunteers.
- Contractors, consultants and third parties working for or on behalf of EPIC.
- Relevant to tenants.

## 2. INTRODUCTION

Empowering People Inspiring Communities Ltd (EPIC) is committed to providing high-quality services for all our tenants. This includes all tenants, leaseholders, applicants, contractors and agents or anyone else who may use our services or is affected by our decisions. We are committed to providing a high-quality tenant-feedback service, dealing with complaints in a fair and impartial way; tenants who complain will not be treated differently

**EPIC's clear purpose is to be a good landlord and our strategic objectives are the foundation of this policy: -**

- **Tenants – Work alongside our tenants, ensuring that their tenancy with EPIC is sustainable, supported and enjoyable.**
- **Tenants' Homes – Ensure that tenants' homes are accessible, appropriately sized, safe, and well maintained and there is clear and timely communication in place to replace key components.**
- **Communities – Make the most of our geography and place in the community for the benefit of all. This will be driven by having deep knowledge of every tenant, their community and other organisations in the area.**
- **Information – Make the best use of technology available and be confident in the integrity of the data held to inform decision making.**
- **People – Develop our culture to enable a great employee experience and opportunities to fulfil everyone's potential for the benefit of the individual and our tenants.**

The policy should be used for complaints about EPIC and the services that we deliver, including contractors' performance. The policy should not be used for complaints relating to a tenancy issue

e.g., nuisance neighbours etc., which should be reported via the tenancy breach/anti-social behaviour process. However, it can be used to complain about our failure to deal with a tenancy issue appropriately.

### 3. CONTEXT

This document sets out our policy for dealing with complaints at EPIC Housing.

We define a complaint as:

An expression of dissatisfaction, however made, about the standard of service, action, or lack of action by the organisation, its staff, or those acting on its behalf, affecting an individual tenant or group of tenants.

The tenant does not have to use the word complaint for it to be treated as such. If a tenant specifically requests an issue not to be treated as a complaint it will not be regarded as one. A complaint that is submitted by a third party or representative will still be handled in line with this policy.

We recognise the difference between a service request and a complaint. A service request is a request from a tenant requiring action to be taken by us to put something right. We will record, monitor, and regularly review service requests.

A complaint will be raised when the tenant raises dissatisfaction with the response to their service request.

Surveys will provide tenants with information on how they can pursue their dissatisfaction as part of the survey process if they wish.

To be clear, tenants can raise a complaint by any channel available, however, we recommend they use the link on the website [www.epichousing.co.uk](http://www.epichousing.co.uk)

We recommend that tenants explain the details of the complaint from their point of view and the outcome they are seeking in their initial contact.

**Tenants can contact the Housing Ombudsman Service at any point during their complaint.**

**Contact details for the Ombudsman:**

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

**Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ**

**Call: 0300 111 3000**

**Our Complaints Procedure has 2 stages which are:**

#### **Stage one**

- In all Stage One cases; a letter or email of acknowledgment will be sent to the complainant within **five working days of receipt**.
- The Complainant should receive a full written response within **ten working days of receipt of the original complaint being acknowledged**.

- In particularly complex cases, if more time is needed to investigate and respond to the complaint, we will discuss this with the complainant.
- Complainants will be given the contact details for the Ombudsman Service if more time is needed to respond to complaints.
- The Complainant will have 21 days in which to escalate their complaint if they remain dissatisfied with the outcome.

### Stage two

- Complaints that are not resolved at Stage One will be reviewed at a more senior level within the organisation and by someone who was not involved in the Stage One investigation and response.
- A request to escalate complaints will be acknowledged within **5 days of receipt** of a request to escalate the complaint and will confirm whether or not the complaint has been escalated.
- A final response to the Stage Two investigation will be provided within **20 days of the complaint being acknowledged**.
- If more time is needed to investigate and respond to the complaint, we will discuss this with the complainant and provide them with the Housing Ombudsman's contact information.
- The right to challenge the final decision is through the Housing Ombudsman along with their contact details: [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)

**Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ**

Call: 0300 111 3000

## 4. ACCEPTING & ESCALATING A COMPLAINT

EPIC will not unreasonably refuse to accept or escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action.

When refusing to accept a complaint EPIC will confirm this in writing to the complainant and evidence their reasons for doing so and will consider each complaint on its own merit.

When a complainant seeks to escalate a complaint, we will consider:

- What the escalation review will be about i.e., why the tenant remains dissatisfied, and whether any part of the complaint has been resolved.
- Who will undertake the review.
- Who needs to be kept informed.
- What evidence needs to be gathered i.e., comments from those involved, relevant policies and contemporaneous records, inspections etc.
- How long the review will take and when it will be completed.

Where we decide not to escalate a complaint, an explanation will be given to the complainant. It will make clear that the previous response was its final response to the complaint and provide information on referral to the Housing Ombudsman.

## 5. EXCLUSIONS

We will accept complaints unless there is a valid reason not to do so; our exclusions are:

- The issue giving rise to the complaint occurred over 12 months ago. (N.B. we may not rely on this exclusion where complaints concern safeguarding or health and safety issues.)
- Legal proceedings have been started. We will take steps to ensure that tenants are not left without a response for lengthy periods of time, for example, where a letter before action has been received or issued but no court proceedings are started, or settlement agreement reached.
- The issue giving rise to the complaint is not within EPIC's estate or was wrongly directed to EPIC.
- Complaints being pursued in an unreasonable manner, including persistent, repetitive, and vexatious complaints by one person, or where the complaint has already been dealt with in accordance with the complaints procedure. In the case of a vexatious complaint being made, in exceptional circumstances we may take legal action against the complainant where this would be an appropriate and proportionate response.
- Matters that have previously been considered under the Complaints Policy.

A tenant has the right to challenge this decision not to consider a complaint by taking their complaint to the Housing Ombudsman. If appropriate, the Housing Ombudsman will instruct EPIC to take on the complaint.

## 6. UNREASONABLY PERSISTENT OR VEXATIOUS COMPLAINTS

We define an unreasonable and persistent complainant as:

“Complainants who, because of the frequency or nature of their contacts with EPIC, hinder our consideration of their or other people's complaints.”

Although unreasonable or persistent, the complainant may have justified complaints which they are pursuing in inappropriate ways, therefore, before treating a complainant as such EPIC must be satisfied that:

- Their complaint is being or has been investigated in line with our procedure.
- The decision reached at the end of this was the right one.
- All communication with the complainant has been adequate and reasonable.
- The complainant is not providing any significant new information that may affect EPIC's decision.

If the above conditions have been satisfied, a member of the Executive Team will take the decision as to whether to treat the complainant as unreasonable, persistent, or vexatious. If we decide to proceed, the Complaints Procedure will be followed.

Any restrictions imposed on complainants will be reviewed every 6 months and a decision taken as to whether to continue or lift the restrictions. All decisions must be communicated to the complainant in writing (including via email where appropriate).

If a complaint is forwarded to the Housing Ombudsman for consideration, EPIC will co-operate fully and comply with all reasonable findings or recommendations.

Any complaint, even from a persistent or vexatious complainant, will be reviewed to ensure that EPIC comply with legal obligations.

## 7. ACCESSIBILITY AND AWARENESS

- EPIC operates efficient, helpful, and professional tenant services which are available online; telephone and face-to-face services continue to be available for tenants who cannot access our services digitally or for more complex queries or advice.
- A member of EPIC's Board has been 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').
- The Director of Housing Management is the person assigned to take responsibility for complaints handling.
- We monitor our complaints, using a Complaint handling log, this log tracks the performance of each stage of our complaint. We use this information to provide updates to the Senior Leadership Team, MRC and the Board. This log is used to identify categories of complaints, trends and lessons learned.
- EPIC provides access to this Complaints Policy via our website [www.epichousing.co.uk](http://www.epichousing.co.uk)
- Where our services do not meet this standard EPIC wants to hear from you.
- EPIC will consider the needs of our tenants, residents, and stakeholders when implementing our complaints policies and procedures.
- We communicate with our tenants and seek feedback via several methods; EPIC encourages complaints, compliments, and suggestions about our services. Tenants are encouraged to submit their comments via our website at [www.epichousing.co.uk](http://www.epichousing.co.uk)
- While we are happy to receive feedback through any channel, we would strongly recommend that you use the direct channels rather than social media for your own protection and confidentiality. If we are contacted via social media, we will respond in a private environment rather than any public forum in the interests of confidentiality.

## 8. HOW TO MAKE A COMPLAINT

### How to Make a Complaint

Information about how to make a complaint or give feedback can be found on our website [www.epichousing.co.uk](http://www.epichousing.co.uk)

Tenants can complain via the following mechanisms we will, however, take a complaint via whatever mechanism it is raised:

Online via our website:  
[www.epichousing.co.uk](http://www.epichousing.co.uk)

In writing to:  
EPIC,  
131-141 Ubbertley Road,  
Bentilee,  
Stoke-on-Trent,  
ST2 0EF

By telephone:  
Tel: 01782 252575

Via email: [mailbox@epichousing.co.uk](mailto:mailbox@epichousing.co.uk)

Our tenants can ask a friend, relative, a trusted person or an advocate to contact us on their behalf. In these cases, we will need the tenant's consent to discuss any issues or provide a response to them.

## 9. RESPONSIBILITIES

All staff are responsible for:

- Ensuring that they adhere to this policy.
- Escalate complaints in accordance with the complaints procedure.

The Director of Housing is responsible for ensuring that the policy and procedure are effective and in line with the [Housing Ombudsman's Complaint Handling Code](#)

## 10. TRAINING

Staff will be given the appropriate training to enable them to deal effectively with complaints.

## 11. DATA VALIDATION, REVIEW AND MONITORING

11.1 Operational responsibility for ensuring compliance with this policy lies with the Member Responsible for Complaints (MRC) and the Director of Housing Management.

11.2 A member of the Board known as the Member Responsible for Complaints takes the lead responsibility for complaints to ensure and support a positive complaint-handling culture.

11.3 The Director of Housing provides monthly reports to the Senior Leadership Team on EPIC's complaints and complaints handling, a quarterly update report is also produced for the Board and MRC.

11.4 The MRC ensures that the Board receives regular information on complaints to provide insight into EPIC'S complaint handling performance. The MRC has access to all suitable information and staff in order to perform this role on their findings.

11.5 The MRC and the Board receive:

- Regular updates on the volume, category and outcomes of complaints
- Complaint handling performance
- Regular reviews of any trends arising from complaints.
- Regular updates on the outcomes of any Ombudsman's investigations and progress made in complying with any orders related to severe maladministration findings; and
- The annual complaints self-assessment, performance and service improvement report.

## 12. EQUALITY AND DIVERSITY IMPLICATIONS

We are committed to ensuring and promoting equality of opportunity for all. We are opposed to discrimination on any grounds, including race, religion, gender, marital status, sexual orientation, disability, age, or any unjustifiable criteria. We are committed to developing a culture that values people from all sections of society and the contribution which everyone can make. We will ensure our approach to accessing properties is considerate of people's individual needs. We also adhere to the Equality Act 2010.

EPIC Housing recognises that some people experience disadvantage due to their socio-economic circumstances and will strive to ensure no person or groups of persons is treated with injustice due to their personal circumstances. EPIC will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make sure the central principles of the Human Rights Act (1998) will be adhered to.

## 13. MONITORING / REVIEW

This policy will be reviewed every 3 years. A review may be conducted earlier if there are significant changes to either legislation or EPIC's operating practices.

## 14. ASSOCIATED DOCUMENTS

- Housing Ombudsman – [Complaint Handling Code](#)
- Compensation Policy
- Regulator of Social Housing – [Consumer Standards](#)

**ALTERNATIVE FORMATS OF THE COMPLAINTS POLICY CAN BE PROVIDED ON REQUEST.**



## Version Control

Date of Review	Reviewer	Version Number	Changes	Date of Next Review	Approved By
05.04.2023	Cindy Gleghorn	V.8	Removal of, and changes to procedure which was previously combined within this policy.  Timescales added to response and escalation times.	April 2026	Board
12.03.24	Cindy Gleghorn	V9	Updated in line with revised Complaint Handling Code		
20.06.2024	Cindy Gleghorn	V10	Updated in line with audit recommendations.	April 2027	Board