

## Self-assessment form (2024)

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.

\*A Hyperlink to Complaints Policy V.9 will be updated available once live.

## Section 1: Definition of a complaint

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation   |
|----------------|--|------------------|--|--|
| 1.2            | <p>A complaint must be defined as:</p> <p><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></p> | Y                | <p>Complaints Policy V9</p> <p>There is ongoing Complaints training with front line staff at EPIC which commenced in March 2024.</p> | <p>Our Complaint Policy recognises and defines 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 resident or group of residents”.</p> <p>Complaints training has taken place in March 2024 – ‘changing the mindset’, followed by training based on the Ombudsman’s Complaint Handling Code in 2024 for front line staff.</p> |
| 1.3            | <p>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</p>   | Y                | Complaints Policy V9   | <p>The word complaint does not have to be used for it to be treated as such.</p> <p>Third parties complaints are accepted and handled within the landlord’s</p>  |

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|     | handled in line with the landlord's complaints policy.   |   |   | complaints policy, including MP enquiries.  |
| 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 | Complaints Policy V9  | We recognise the difference between a service request and a complaint and will regularly monitor service request.<br><br>Service requests will form part of the procedural review planned in 2024.    |
| 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 | A complaint is raised following an expression of dissatisfaction, even during the handling of a service request.<br><br>Complaints Policy V9  | Regardless of the complaint process, the request to put something right will be ongoing throughout the service request or complaint. An example of this would be outstanding repairs. Damp and Mould. |
| 1.6 | An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about   | Y | The Complaints Policy commits to provide tenants on how they can pursue their dissatisfaction as part of the survey process if they wish. This data is available via internal files<br>N:\Corporate\TSM - STAR survey\Survey 2023 | EPIC used the STAR Survey in 2023 to seek the views of its tenants and measure the suite of TSMs asking the specific question "are you aware of how to make a complaint?"                             |

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|  | their services, they also must provide details of how residents can complain. |  | 54% of tenants said they were satisfied with EPIC approach to dealing with complaints | 76.26% respondents confirmed they did. More work is required to ensure tenants know how to complain. |
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## Section 2: Exclusions

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation  |
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| 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                | Reasons for not accepting a complaint are outlined in Section 5 the Complaints Policy.                     |   |
| 2.2            | <p>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:</p> <ul style="list-style-type: none"> <li>• The issue giving rise to the complaint occurred over twelve months ago.</li> <li>• 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.</li> </ul> | Y                | <p>Section 5 of the Complaints Policy sets out its reasons for exclusions.</p> <p>Complaints Policy V9</p> | The Complaints Policy reflects the changes in the Complaint Handling code which are set out in Section 5 bullet point 1 (which was previously 6 months) and include bullet point 3. |

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|     | <ul style="list-style-type: none"> <li>Matters that have previously been considered under the complaints policy.</li> </ul>   |   |  |  |
| 2.3 | <p>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.</p> | Y | <p>The Complaints Policy dictates timescales as and when complaints should be referred to them and would only be refused if the complaint was refused within one of the points highlighted within the Complaints Policy.</p> <p>Complaints Policy V9</p> |  |
| 2.4 | <p>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</p>                           | Y | <p>If EPIC decides not to accept a complaint, an explanation will be given to the complainant as outlined in Section 4 of the Complaints Policy.</p> <p>Complaints Policy V9</p>   |  |

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|     | fairly applied, the Ombudsman may tell the landlord to take on the complaint.  |   |   |  |
| 2.5 | Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint. | Y | <p>Section 5 of the Complaints Policy – EPIC does not take a blanket approach to excluding complaints, particularly where complaints concern safeguarding or health and safety issues. Tenants are advised that they have the right to challenge a decision by taking their complaint to the Housing Ombudsman.</p> <p>Complaints Policy V9</p> |  |

### Section 3: Accessibility and Awareness

| Code provision | Code requirement  | Comply: Yes / No | Evidence   | Commentary / explanation   |
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| 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                | Section 3 of the Complaints Policy confirms that Tenants can raise a complaint by any channel.<br><br>Complaints Policy V9<br><br>The Complaints Policy Section 12 takes into account the Equalities Act. Each EPIC policy and procedure is accompanied by Equality Impact Assessment. | An Equality Impact Assessment will support an updated version of the Complaint Policy.       |
| 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                | Tenants can raise their complaints in any way with any member of staff. Staff are aware of the complaints process and to whom they should pass the complaint on.<br>Section 8 of the Complaints Policy states EPIC will take a complaint by whatever mechanism it is raised.           | Staff are given the appropriate training to enable them to effectively deal with complaints. |



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|     |  |  | Complaints Policy V9  |   |
| 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.   |  | Complaint levels continue to be low; the Complaints Policy is found on our website:<br><br>there is also an opportunity for tenants to make comments via the website using the contact form:<br><a href="https://epichousing.co.uk/contact/">https://epichousing.co.uk/contact/</a><br><br>or to report a complaint:<br><a href="https://epichousing.co.uk/contact/">https://epichousing.co.uk/contact/</a> | A performance report is taken to the Senior Leadership on a monthly basis.<br><br>KPIs are reported to Board on a quarterly basis with a six-monthly in-depth review. |
| 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. |  | A copy of the Complaints Policy is available on EPIC's website and is in a clear and accessible format.<br><br>Complaints Policy V9   | The Policy will be updated to include alternative formats and translation services are available.   |
| 3.5 | The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.   |  | The Complaints Policy Section 7 confirms that access to the Complaints Policy is via EPIC's website.<br><br>Section 9 of the Policy refers to Ombudsman Complaints Handling Code.   | A hyperlink to the new code will be included in the revised policy.   |

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|     |  |  | Complaints Policy V9   |   |
| 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. |  | Section 8 of the Complaints Policy provides an opportunity for the complainant to have a representative act on their behalf.<br><br>Complaints Policy V9 | EPIC will ask for consent from the tenant before entering into conversation with a third party. |
| 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.             |  | Tenants are advised at each touch point on their rights to contact the Ombudsman Service.<br><br>Complaints Policy V9                                    |   |

## Section 4: Complaint Handling Staff

| Code provision | Code requirement   | Comply: Yes / No | Evidence   | Commentary / explanation  |
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| 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                | <p>Section 9 of the Complaints Policy confirms that "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."</p> <p>Complaints Policy V9</p>                        | The Director Of Housing has overall responsibility for ensuring that the policy and procedure are effective. The Customer Service and Resident Involvement Officer is responsible for the day-to-day administration of the policy and tenant liaison. |
| 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   | Y                | <p>The Director of Housing and the Customer Service &amp; Resident Involvement Team Leader has access to staff at all levels in order to facilitate a prompt resolution of complaints.</p> <p>The complaints are reviewed at a Senior Management level on a monthly basis.</p> | Being a small housing provider with a relatively flat structure, access to staff at all levels and decision making is not delayed because of hierarchical   |

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|     | resolve disputes promptly and fairly.   |   |   | structures or processes.  |
| 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 | In March 2024, front line staff completed training with Simon Bernstein from Empathy Transformation a specialist coach and training advisor to the Housing Sector. The training focused on improving our customer journey by adapting mindsets to meet the needs of the tenant. | EPIC prioritises complaint handling and a culture of learning from complaints. All tenant-facing staff are suitably trained in the importance of complaint handling.<br><br>Customer Service and Complaint handling training was completed planned for March 2024, which will be followed by refreshers in line with the new code training, planned for 2024. |

## Section 5: The Complaint Handling Process

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation  |
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| 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                | EPIC has a single Complaints Policy and tenants are not treated differently if they complain.<br><br>Complaints Policy V9 | EPIC has a single Complaints Policy which takes into account that tenants who complain will not be treated differently. |
| 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 stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion. | Y                | EPIC operates a 2-Stage Complaints Policy.<br><br>Complaints Policy V9  |   |
| 5.3            | A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long   | Y                | Complaints Policy V9  | EPIC does not operate a process with more than two stages.  |

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|     | and delay access to the Ombudsman.  |   |  |   |
| 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 complaints processes. | Y |  | EPIC does not use a third party to handle complaints. EPIC does not operate a process with more than two stages.                          |
| 5.5 | Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.  | Y |  | EPIC does not use a third party to handle complaints.   |
| 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   | Y | Copies of all correspondence are held on internal files. | When responding to complaints, EPIC sets out their understanding of the complaint. If any aspect of the complaint is unclear tenants will |

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|     | will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.   |   |  | <p>be contacted and asked for clarification.</p> <p>It is usual that after a complaint, acknowledgement has been sent and a conversation takes place with the complainant to ensure that their complaint is fully understood.</p> |
| 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 | Copies of all correspondence are held on internal files. | An acknowledgement to complainants is sent within the code’s specified timescales. The acknowledgement correspondence will confirm any areas EPIC is not responsible for.   |
| 5.8 | At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act</li> </ul>                               | Y |  | Each stage of the complaints process deals with complaints adhering to the points made in a-d, considering all of   |

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|      | <p>independently, and have an open mind;</p> <p>b. give the resident a fair chance to set out their position;</p> <p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p> |   |   | the relevant information and evidence carefully before responding.  |
| 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 | If the complaint is likely to fall outside of the complaint handling code, EPIC will discuss this with the tenant and keep the tenant informed at suitable intervals on progress which is highlighted within the Policy |   |
| 5.10 | Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any  | Y | Complaints Policy V9<br>Equality Impact Assessment  | EPIC will make reasonable adjustments for tenants where appropriate under the Equality Act; the Equality Act is |



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|      | reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.   |   |   | referred to in the Complaints Policy. An Equality Impact Assessment supports the Policy.<br><br>Any adjustments will be recorded and kept under review.  |
| 5.11 | Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code. | Y | Complaints Policy V9  | EPIC will not refuse to escalate a complaint through its complaint stages unless it has a valid reason to do. If EPIC does refuse to escalate a complaint, it would be on the basis of provision set in section 2 of the 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   | Y | The complaints tracker can be found on N:\Corporate\Management Team (including Team Leaders)\Serious Case Review Register & Monitoring\Formal complaint monitoring 2024.xlsx" | A log of all complaints is kept; complaints received are entered on to a tracker, and the timescales   |

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|      | correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.  |   |  | achieved within complaint stage. A copy of all correspondence with the tenant is held in a Complaints file along with any supporting documents.   |
| 5.13 | Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation. | Y | <a href="https://epichousing.co.uk/app/uploads/2023/04/Compensation-Policy-V1.0-March-2023.pdf">https://epichousing.co.uk/app/uploads/2023/04/Compensation-Policy-V1.0-March-2023.pdf</a> which provides staff with an opportunity to resolve complaints without the need to escalate where appropriate. | <p>EPIC has processes in place to ensure a complaint can be remedied at any stage of the complaints process.</p> <p>EPIC has a Compensation Policy; the aim of the policy is to restore a tenant to the position they would have been in had the service failure not occurred, recognising that</p> |

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|      |   |   |   | there are various options available to put things right but, in some instances, recognising that financial compensation may be the only and appropriate form of recompense. |
| 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 | <p>EPIC has policies and procedures in place for managing unacceptable behaviour. Section 6 of the Complaints Policy addresses “Unreasonably Persistent or Vexatious complaints.”</p> <p>Complaints Policy V9</p> <p>EPIC has a Violence and Aggression Policy<br/> <a href="https://epichousing.co.uk/app/uploads/2024/01/Violence-and-Aggression-Policy-v1.0-Oct-2023.pdf">https://epichousing.co.uk/app/uploads/2024/01/Violence-and-Aggression-Policy-v1.0-Oct-2023.pdf</a></p> <p>EPIC has an ASB and Tenancy Enforcement Policy, outlining grounds for restrictions and the course of actions that will be taken against tenants who are in breach of their tenancy.</p> <p><a href="https://epichousing.co.uk/app/uploads/2024/01/ASB-Tenancy-Enforcement-Policy-v1.1-Sept-2022.pdf">https://epichousing.co.uk/app/uploads/2024/01/ASB-Tenancy-Enforcement-Policy-v1.1-Sept-2022.pdf</a></p> |   |

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| 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 | Any restrictions imposed on a complainant will be reviewed every 6 months in accordance with Section 6 of the Complaints Policy V9 |  |
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## Section 6: Complaints Stages

### Stage 1

| Code provision | Code requirement  | Comply: Yes / No | Evidence  | Commentary / explanation   |
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| 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                |   | <p>On receipt of a complaint an assessment is made, and contact is made with the tenant. EPIC aims to identify if the tenant has any vulnerabilities during the initial contact.</p> <p>A response is sent, confirming any outstanding action before the event and not after the action is complete; these actions are tracked before a case can be closed. Complaints are dealt with as swiftly as possible and ahead of the prescribed timescales where possible. If cases are particularly complex and additional time is needed to carry out an investigation or find a resolution, tenants are kept informed.</p> |
| 6.2            | Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b>within five</b>   | Y                | Copies of the reports can be found in the minutes of Senior | All complaints response times are dealt with in accordance with the code's   |

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|     | <b><u>working days of the complaint being received.</u></b>   |   | Leadership Team Meetings and in Minutes from Board Meetings. | requirement. Performance is report to the Leadership Team monthly, and Board on a quarterly basis followed by an in-depth 6-monthly report.  |
| 6.3 | Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.  | Y |  | All complaints response times are dealt with in accordance with the code's requirement. Performance is report to the Leadership Team monthly, Board on a quarterly basis followed by an in-depth 6-monthly report. |
| 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 |  | Any extension of time is agreed with the tenant and will not exceed the prescribed timescales without good reason.   |
| 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 |  | Tenants are provided with contact details for the Ombudsman where extension to timescales is required.   |
| 6.6 | A complaint response must be provided to the resident when the answer to the complaint is known, not when the   | Y |  | A response is sent confirming any outstanding action before the event and  |

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|     | 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.   |   |  | not after the action is complete; these actions are tracked before a case can be closed.   |
| 6.7 | Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.   | Y |  | Each of the points raised in the complaint is confirmed and responded to, making reference to relevant policy, law and good practice.  |
| 6.8 | Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint. | Y |  | Where additional points are raised during an investigation, these will be included in the original complaint so not to unreasonably delay a response. Where a complaint response has been issued and the new issues would delay a response, these are logged as a new complaint. |
| 6.9 | Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> </ul>   | Y |  | Templates are provided as a guide for responding to complaints. A review of all Corporate literature is due to be undertaken in 2024 in line with ongoing implementation and upgrades of Civica CX Housing   |

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|  | <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</p> |  |  |  |
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## Stage 2

| Code provision | Code requirement  | Comply: Yes / No | Evidence | Commentary / explanation   |
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| 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 are escalated when requested. If we were to refuse an escalation, we would clearly communicate in writing why this was the case as well as giving the contact details of the Ombudsman. |
| 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                |          | Acknowledgement is given and confirmation of remaining issues is sought where unclear.   |
| 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                |          | Tenants will not be required to explain their reasons for requesting stage 2 consideration; EPIC will contact the tenant to identify why they remain unhappy.                                      |



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| 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 V9 | The person considering the stage 2 complaint will have had no involvement in the stage 1 complaint.  |
| 6.14 | Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.  | Y | Complaints Policy V9 | EPIC will issue a final response to a stage 2 complaint within the prescribed timescales.  |
| 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 |                      | EPIC will issue a final response to a stage 2 complaint within the prescribed timescales, unless an extension has been agreed with the tenant.                     |
| 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 | Complaints Policy V9 | EPIC will provide contact details of the Ombudsman if an extension to the prescribed timescales is required.   |
| 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 |                      | A response is sent confirming any outstanding action before the event and not after the action is complete; these actions are tracked before a case can be closed. |
| 6.18 | Landlords must address all points raised in the complaint definition and  | Y |                      | EPIC will address all points raised in the complaint   |

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|      | provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.  |   |                      | definition and provides clear reasons for any decision referencing relevant policy, law and good practice where appropriate.   |
| 6.19 | Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: <ul style="list-style-type: none"> <li>a. the complaint stage;</li> <li>b. the complaint definition;</li> <li>c. the decision on the complaint;</li> <li>d. the reasons for any decisions made;</li> <li>e. the details of any remedy offered to put things right;</li> <li>f. details of any outstanding actions; and</li> <li>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</li> </ul> | Y |                      | Response templates are provided as a guide for responding to complaints. A review of all Corporate literature is due to be undertaken in 2024 in line with ongoing implementation and upgrades of Civica CX Housing letter template is provided. |
| 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 V9 | Stage 2 letters are EPIC's final response and will involve such staff members as the Senior Leadership Team to issue such a response.  |

## Section 7: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence | Commentary / explanation  |
|----------------|--|------------------|----------|---|
| 7.1            | <p>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:</p> <ul style="list-style-type: none"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul> | Y                |          | This is set out in the complaint response on an individual level, and any systemic failings would be identified in the annual reporting.          |
| 7.2            | Any remedy offered must reflect the impact on the resident as a result of any fault identified.  | Y                |          | Any failings would be accepted, and appropriate remedies offered.   |
| 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                |          | Remedies are confirmed as part of the complaints process, in agreement with the tenant and followed through to completion. Complaints remain open |

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|     |  |   |  | until remedies are complete. |
| 7.4 | Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies. | Y | EPIC takes account of the guidance issued by the Ombudsman when deciding on appropriate remedies.<br><br><a href="https://epichousing.co.uk/app/uploads/2023/04/Compensation-Policy-V1.0-March-2023.pdf">https://epichousing.co.uk/app/uploads/2023/04/Compensation-Policy-V1.0-March-2023.pdf</a> |                              |

## Section 8: Putting things right

| Code provision | Code requirement   | Comply: Yes / No | Evidence  | Commentary / explanation |
|----------------|--|------------------|---|--------------------------|
| 8.1            | <p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> <li>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</li> <li>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;</li> <li>c. any findings of non-compliance with this Code by the Ombudsman;</li> <li>d. the service improvements made as a result of the learning from complaints;</li> <li>e. any annual report about the landlord's performance from the Ombudsman; and</li> <li>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</li> </ul> | Y                | <p>A complaints-handling performance report is included in the EPIC's Annual Tenants' report for scrutiny which includes points a – f where appropriate.<br/> <a href="https://epichousing.co.uk/news/2022-23-annual-tenants-report/">https://epichousing.co.uk/news/2022-23-annual-tenants-report/</a></p> <p>The annual self-assessment measured against the code is published on EPIC's website.<br/> <a href="https://epichousing.co.uk/app/uploads/2023/06/Self-Assessment-Complaints-Handling-Code-2022-23.pdf">https://epichousing.co.uk/app/uploads/2023/06/Self-Assessment-Complaints-Handling-Code-2022-23.pdf</a></p> <p>KPIs reported to Board on a quarterly basis with a six-monthly in-depth review.</p> |                          |

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| 8.2 | The annual complaints performance and service improvement report must be 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. | Y | <p>KPIs reported to Board on a quarterly basis with a six-monthly in-depth review. A copy of the report which was taken to Board in 2023 can be found at: N:\Corporate\Board matters\Board Agendas &amp; Minutes\2023\3 25 May 2023\05 B250523 2022&amp;23 Complaints and Self Assessment.docx"</p> <p>A complaints-handling performance report is included in the EPIC's Annual Tenants' report.<br/> <a href="https://epichousing.co.uk/news/2022-23-annual-tenants-report/">https://epichousing.co.uk/news/2022-23-annual-tenants-report/</a></p> | <p>The in-depth performance and service report reported to the Board will be published in 2024 and thereafter on EPIC's website under the heading Corporate Information.<br/> <a href="https://epichousing.co.uk/corporate-information/">https://epichousing.co.uk/corporate-information/</a></p> |
| 8.3 | Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.  | Y |  | <p>A new self-assessment will be carried out following a significant restructure or merger and/or changes in procedure.</p> <p>No significant restructures or mergers are planned for 2024.</p>   |
| 8.4 | Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.   | Y |  | <p>EPIC would cooperate with the Ombudsman if, following an investigation, it is necessary to do so.</p>  |

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| 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 |  | In the event of EPIC invoking Business Continuity, if unable to comply with the code, the Ombudsman would be provided with the tenants' details who may be affected. This is provided for in EPIC's Business Continuity Plan. |
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## 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                | A copy of the response to the tenant can be found:<br><br>N:\Corporate\Management Team (including Team Leaders)\Serious Case Review Register & Monitoring\2024 Complaints\January\38 Maidstone | EPIC will look beyond the circumstances of the complaint as part of the lessons-learnt exercise to consider service improvements; an example of this was changing the specification of front doors.  |
| 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                |  | An in-depth performance report is taken to Board on a sixth-monthly basis; this report will identify common themes and issues which would be used to introduce positive changes in service delivery. |
| 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                |  | Learning from complaints will be fed back through the Tenant Annual Report and using the ongoing work we have planned and to do with engaged tenants and Tenant Ambassadors                          |
| 9.4            | Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person  | Y                | Complaints Policy V9   | The Director of Housing Management is the senior   |



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|     | must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.   |   |                      | lead person accountable for complaint handling.  |
| 9.5 | In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').                               | N | Complaints Policy V9 | EPIC will appoint an MRC at its Board Meeting in May 2024.   |
| 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 |                      | The MRC will work with the Executive to ensure that the governing body receives regular information on complaints and insight on complaint-handling performance.                             |
| 9.7 | As a minimum, the MRC and the governing body (or equivalent) must receive:<br>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;<br>b. regular reviews of issues and trends arising from complaint handling;                     | Y |                      | The MRC will receive quarterly performance reports, in addition to two in-depth assessment reports, which will identify issues and trends arising from complaints inclusive of points a – d. |

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|     | <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>  |   |                      |   |
| 9.8 | <p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p> | Y | Complaints Policy V9 | <p>EPIC's Corporate Plan is focused on our tenants.</p> <p>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. : No complaint received by EPIC are as a result of poor attitude or behaviour by an employee.</p> <p>The aim of the policy is to ensure that EPIC has an approach to complaints that is clear, simple and accessible. By listening to our tenants and dealing with complaints about our services, we can make improvements based on the feedback from our tenants. This allows us to manage,</p> |

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|  |  |  |  | respond and learn from our complaints. |
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