



# Complaints Policy

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## POLICY SUMMARY

**Please note that where we use EPIC within this Policy, we refer to EPIC Limited.**

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 tenants and dealing with complaints about our services, we can make improvements based on the feedback from 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 tenants understand how we will investigate their complaint and how we will respond. The Policy is published on EPIC's website as well as being discussed with new tenants when signing for their tenancy.

We have developed this policy in line with the dispute resolution principles recommended by the Housing Ombudsman. The Housing Ombudsman is an independent, impartial and free service that investigates complaints from tenants. If tenants have a complaint about EPIC that they have not been able to resolve through our internal complaints process they can contact the Housing Ombudsman.

### **Contact details for the Housing Ombudsman:**

- [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)
- Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
- Call: 0300 111 3000

An accessible copy of this Complaints Policy is available and can be found [here](#). Tenants also have access to a translation service should English not be their first language. Access to this service can be made through contacting EPIC:

- By telephone: Tel: 01782 252575
- Via email: [mailbox@epichousing.co.uk](mailto:mailbox@epichousing.co.uk)
- In person to any member of EPIC staff.

## 1. APPLICABILITY

The Policy applies 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.
- Tenants.
- Board Members.

## 2. INTRODUCTION

- 2.1 EPIC is committed to providing high-quality services for all tenants, leaseholders, applicants, contractors, 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.
- 2.2 EPIC's vision is to empower tenants with the resources and support they need to thrive, while also making a positive impact on the wider community. 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, right size, safe, and well maintained and there is clear and timely communication in place for replacing key components e.g., kitchen, bathroom.
  - 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.
- 2.3 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 Anti-Social Behaviour, which should be reported via the [ASB and Tenancy Enforcement Policy](#) or by completing an [Anti-social Behaviour Report Form](#).
- 2.4 The Policy can also be used to complain about our failure to deal with a tenancy issue appropriately.
- 2.5 As part of the annual tenant report, a specific section is included around the annual performance on Complaints and Compliments. This would also include reference to whether any complaints were referred to the Housing Ombudsman and their outcome.

## 3 CONTEXT

- 3.1 This document sets out our policy for dealing with complaints at EPIC .  
**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.**
- 3.2 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, including MP enquiries.
- 3.3 Consideration will be given to the individual needs and any vulnerabilities of the complainant when dealing with a complaint and whether or not EPIC needs to make any reasonable adjustments when dealing with the complaint. A record of any reasonable adjustment being made will be recorded as part of the complaint. Where reasonable adjustments are required, these will be discussed and confirmed with the complainant in order to reach a satisfactory resolution.
- 3.4 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. Where we believe that matter to be a service request, we will discuss this with the tenant at the point of contact to ensure that they are clear about the route we are taking.

- 3.5 We record, monitor, and regularly review service requests specific to the nature of the request. For example, a general enquiry would be via EPIC's Customer Relationship Management System.
- 3.6 A complaint will be raised when the tenant raises dissatisfaction with the response to their service request. Staff receive regular training aligned to this Policy, including EPIC's approach to working with tenants to 'nip in the bud' any issues raised at first contact.
- 3.7 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 the use of the link on the website [Feedback and Complaints Form](#)
- 3.8 At each stage of the complaint, complaint handlers must:
- deal with complaints on their facts, act independently, and have an open mind;
  - give the tenant 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.
- 3.9 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.
- 3.10 Tenants can contact the Housing Ombudsman Service at any point during their complaint.
- 3.11 We will respond to the complaint as soon as the answer to a complaint is known and not when any outstanding actions in relation to the complaint have been addressed. Responses will be within the Complaint Handling Code timescales unless we have agreed with the tenant otherwise.

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## 4 COMPLAINTS PROCESS

- 4.1 Our complaints processes in place will consider which complaint can be responded to as early as possible and those which require further investigation. In addressing complaints EPIC will consider factors such as the complexity of the complaint and whether the complainant is vulnerable or at risk.
- 4.2 EPIC has two stages to its complaint process which are in line with the Housing Ombudsman Complaint Handling Code.
- 4.3 When something has gone wrong EPIC will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include:
- Apologising.
  - Acknowledging where things have gone wrong.
  - Providing an explanation, assistance or reasons for the problem.
  - Taking action if there has been delay putting something right.
  - Reconsidering or changing a decision as per the escalation process.
  - Amending a record if we have this information incorrectly recorded.
  - Providing a financial remedy.
  - Changing policies or processes.
- 4.4 Any remedies that are put in place will clearly set out what will happen and by when, in agreement with the tenant.

## 5 STAGE ONE

- 5.1 In all stage 1 cases, a letter or email of acknowledgment will be sent to the complainant within **five working days of receipt** of the complaint. The acknowledgement will detail which aspects of the complaint EPIC are, and are not, responsible for and clarify any areas where this is not clear.
- 5.2 The Complaint will receive a full written response within **ten working days of receipt of the original complaint being acknowledged**.
- 5.3 EPIC will address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.
- 5.4 EPIC will confirm the following in writing to the complainant at the completion of stage 1 in clear, plain language:
- The complaint stage.
  - The complaint definition.
  - The decision on the complaint.
  - The reasons for any decisions made.
  - The details of any remedy offered to put things right.
  - Details of any outstanding actions; and
  - Details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.
- 5.5 In particularly complex cases, if more time is needed to investigate and respond to the complaint, we will discuss this with the complainant and agree an expected timescale for the response, which will not exceed a further 10 days without good reason which will be clearly explained to the complainant.
- 5.6 Where complainants raise additional complaints during the investigation, these will 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, and 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.
- 5.7 Complainants will be given the contact details for the Housing Ombudsman Service if more time is needed to respond to complaints.
- 5.8 If all or part of the complaint is not resolved at stage 1 to the satisfaction of the tenant, it must be progressed to stage 2 of EPIC's procedure. A complainant can request to escalate the complaint to stage 2, within 28 days of the date of the stage 1 response. Should a tenant request an escalation outside of the 28 day period EPIC will consider each request on an individual basis to ensure fair access to stage 2 of the complaints process.
- 5.9 Complaints that are not resolved at stage 1 will be reviewed at a more senior level within the organisation and by someone who was not involved in the stage 1 investigation and response.

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## 6 STAGE TWO

- 6.1 A request to escalate a complaint to stage 2 will be acknowledged within **five days of receipt** and will confirm whether the complaint has been escalated. The acknowledgement will detail which aspects of the complaint EPIC are, and are not, responsible for and clarify any areas where this is not clear.
- 6.2 Tenants will not be required to explain their reasons for requesting a stage 2 consideration. EPIC will make reasonable efforts to understand why a tenant remains unhappy as part of its stage 2 response.
- 6.3 EPIC will confirm the following in writing to the tenant 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 Housing Ombudsman Service if the individual remains dissatisfied.
- 6.4 The person considering the complaint at stage 2, will not be the same person that considered the complaint at stage 1 and will be at a more senior level in the organisation.
- 6.5 A final response to the stage 2 investigation will be provided within 20 days of the complaint being acknowledged.
- 6.6 If more time is needed to investigate and respond to the complaint, we will discuss this with the complainant ensuring that this does not go beyond an additional 20 days (40 days in total) and provide them with the Housing Ombudsman's contact information.
- 6.7 The right to challenge the final decision is through the Housing Ombudsman:

### Contact details for the Housing Ombudsman:

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- Call: 0300 111 3000

## 7 ACCEPTING & ESCALATING A COMPLAINT

- 7.1 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.
- 7.2 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 merits. EPIC does not use a third party to handle complaints.
- 7.3 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.
- 7.4 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.

## 8 EXCLUSIONS

- 8.1 Listed below are the circumstances in which a matter will not be considered as a complaint or escalated:
- 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 and/or good reasons to do so.)
  - Legal proceedings have been started.
  - The issue giving rise to the complaint is not within EPIC's estate or was wrongly directed to EPIC.
  - Complaints are being pursued in an unreasonable manner, including persistent, repetitive, and in an unacceptable way by one person, or where the complaint has already been dealt with in accordance with the complaint's procedure. In the case of unacceptable behaviour, we may in exceptional circumstances take legal action against the complainant where this would be an appropriate and proportionate response.
  - Matters have previously been considered under the Complaints Policy.
- 8.2 A tenant has the right to challenge the decision not to consider a complaint by taking their complaint to the Housing Ombudsman. If appropriate, the Housing Ombudsman may instruct EPIC to take on the complaint.

## 9 UNACCEPTABLE BEHAVIOUR, UNREASONABLY PERSISTENT COMPLAINANTS

- 9.1 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."
- 9.2 Although unreasonable or persistent, the complainant may have justified complaints which they are pursuing in inappropriate ways, therefore, before treating a complainant as unacceptable, EPIC must be satisfied that:
- Their complaint is being, or has been, investigated in line with our procedures, including all stages of the complaints process.
  - 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.
- 9.3 If the above conditions have been satisfied, the Member Responsible for Complaints will review the complaint and make recommendations to the Executive Team. The Executive Team will take the decision as to whether to treat the complainant as unreasonable, unacceptable or persistent. If a decision to proceed is taken, then the [Managing Unacceptable Behaviour Policy](#) will be referred to.
- 9.4 Any restrictions (as detailed in the Managing Unacceptable Behaviour Policy) on complainants will be reviewed every six 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).
- 9.5 If the complaint is forwarded by the complainant to the Housing Ombudsman for consideration, EPIC will co-operate fully and comply with all reasonable findings or recommendations.
- 9.6 Any complaint, even from an unreasonably persistent complainant, will be reviewed to ensure that EPIC complies with its legal obligations.

## 10 ACCESSIBILITY AND AWARENESS

- 10.1 EPIC operates efficient, helpful, and professional tenant services which are available online, by 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.
- 10.2 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').
- 10.3 EPIC's Customer Service Team is the team assigned to take responsibility for complaint handling with day-to-day responsibility being taken by the Customer Service and Resident Involvement Team Leader. The Director of Housing Management (EPIC's designated Complaints Officer) takes responsibility for liaison with the Ombudsman and for ensuring complaints are reported to the Governing Body.
- 10.4 We monitor our complaints, using a complaint handling log. This log tracks the performance of each stage of the complaint. We use this information to provide updates to the Senior Leadership Team (monthly), the MRC (at least quarterly) and the Board (quarterly). This log is used to identify categories of complaints, trends and lessons learned.
- 10.5 EPIC provides access to this Complaints Policy via our [website](#).
- 10.6 EPIC will consider the needs of our tenants, residents, and stakeholders when implementing our complaints policies and procedures.
- 10.7 We communicate with our tenants and seek feedback via several methods and EPIC encourages complaints, compliments, and suggestions about our services. Tenants are encouraged to submit their comments via our website using our [Contact Form](#).
- 10.8 We are happy to receive feedback through any channel but 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.

## 11 HOW TO MAKE A COMPLAINT

- 11.1 Information about how to make a complaint or give feedback can be found on our website [Feedback/Complaints](#)
- 11.2 Tenants can complain via the following mechanisms. However, we will take a complaint via whatever mechanism it is raised:
- Online via our website: <https://epichousing.co.uk/>  
In writing to:  
EPIC,  
131-141 Ubberley Road,  
Bentilee,  
Stoke-on-Trent,  
ST2 0EF  
Telephone: 01782 252575
  - Via email:  
[mailbox@epichousing.co.uk](mailto:mailbox@epichousing.co.uk)
  - In person to any member of EPIC staff.
- 11.3 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.

## **12 RESPONSIBILITIES**

12.1 All staff are responsible for:

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

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

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

## **13 TRAINING**

13.1 Staff are given the appropriate training to enable them to deal effectively with complaints. The Housing Ombudsman's learning hub provides a number of training courses, which alongside EPIC's own e-learning platform, is a tool used by staff.

## **14 DATA VALIDATION, REVIEW AND MONITORING**

14.1 The Director of Housing Management provides monthly reports to the Senior Leadership Team on EPIC's complaints and complaint handling, a quarterly key performance update report is also produced for the Board and MRC, and a bi-annual in-depth report to Board.

14.2 The MRC ensures that the Board receives regular information on complaints to provide insight in EPIC's complaint-handling performance. The MRC has access to all suitable information and staff to perform this role.

14.3 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 finding; and
- The annual complaints self-assessment, performance and service improvement report.

## **15 EQUALITY AND DIVERSITY IMPLICATIONS**

15.1 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 to people's individual needs. We adhere to the Equality Act 2010.

15.2 EPIC recognises that some people experience disadvantage due to their socio-economic circumstances and we will ensure that 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) are adhered to.

## **16 MONITORING / REVIEW**

16.1 This Policy will be reviewed every three years. A review may be conducted earlier if there are significant changes to either regulation, legislation, or EPIC's operating practices.

## **17 ASSOCIATED DOCUMENTS**

- Housing Ombudsman – Complaint Handling Code
- Compensation Policy
- Regulator of Social Housing – Consumer Standards
- Managing Unacceptable Behaviour Policy
- ASB & Tenancy Enforcement Policy
- Violence and Aggression Policy

**Version Control**

<b>Date of Review</b>	<b>Reviewer</b>	<b>Version Number</b>	<b>Changes</b>	<b>Date of Next Review</b>	<b>Approved By</b>
05.04.23	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		
20.06.24	Cindy Gleghorn	V9a	Updated in line with audit recommendations.	April 2027	Board
24.03.25	Cindy Gleghorn	V10	Updated to reflect Housing Ombudsman Complaint Handling Code and feedback from DTP's review	April 2028	Board