



Equality Impact Assessment (EIA)

Activity being assessed	Complaints Policy V18 June 2026	
Purpose of activity being assessed	Outlines how we'll how we'll manage, monitor and learn from all dissatisfaction in line with the Housing Ombudsman code, , and applicable energy regulation including Heat Network (Market Framework) Regulations 2025, Ofgem consumer protection requirements, and the Energy Ombudsman scheme	
Lead officer	Customer Resolution and Service Improvement Manager	
EIA completed by (colleagues involved in completing EIA with lead officer)	Completed by: Customer Resolution and Service Improvement Manager	Reviewed / amendments suggested by: Energy Manager
Date EIA completed	19/06/26	

Data used in preparing EIA

Data used	Insight obtained and associated considerations
Service users	



Uptake data	Review of current approaches around customer experience
Service satisfaction data	TSM data, The leadership factor survey results and transactional survey
Complaints and compliments about the service	Complaint themes from formal stage 1 and stage 2 complaints
Survey of customers/colleagues	Co – creation of Putting it right service standard linked to policy
Focus group	Themes emerging from recent customer influence related events also considered (co creation of service standard webinar for putting it Right)
Written responses to policy	n/a
Other - please list source	Best practice approaches within housing sector . Housing Ombudsman requirements under Ombudsman code. Heat network complaint data, billing and affordability complaints, and emerging regulatory expectations from Ofgem and the Energy Ombudsman scheme

Data gaps

Info needed	Notes
Insufficient data available regarding accessibility for full range of customers, including vulnerable heat network customers, financially vulnerable customers, and those less likely to escalate complaints	Developed policy in formats to meet need. Will develop a priority services register for heat vulnerable customers.



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Outline who this activity affects

Affected groups	Yes/No
Customers	Yes
Residents within wider community	Yes
Involved customers	Yes
Landlord employees / agents	Yes
VIVID colleagues	Yes
Others – please list	MPs , councillors ,third parties

Potential impact on protected characteristics

Protected Characteristic	Summary of potential impacts	
Age	Positive Impact	Negative Impact
	Neutral impact	



Disability	Positive Impact Customers do not need to use the word complaint for it to be accepted as such as per 2.2 of policy Ongoing comms throughout the complaint journey could provide assurance to those customers with mental health challenges. e.g. allay anxiety , provide reassurance and a statement within policy refers to how the approach could be amended (less or more frequent contact) Additional protections for vulnerable customers receiving heat (e.g. medical dependency on heating/hot water), aligned with Ofgem vulnerability expectations.	Negative Impact Potential risk if vulnerable customers are not identified early, particularly in relation to heat loss, billing issues or service interruptions.
	Neutral impact	
Race	Positive Impact	Negative Impact
	Neutral Impact	
Religion or Belief	Positive Impact	Negative Impact



	Neutral Impact	
Sex	Positive Impact Where possible , we can offer same sex complaint handlers to investigate issues	Negative Impact
	Neutral Impact	
Sexual orientation	Positive Impact	Negative Impact
	Neutral Impact	
Gender reassignment	Positive Impact	Negative Impact
	Neutral Impact	
Marriage or Civil Partnership	Positive Impact	Negative Impact



Pregnancy and Maternity	Neutral Impact	
	Positive Impact Customers who are pregnant or have children under 5 years old are eligible to be enrolled in the Priority Service Register for heat networks	Negative Impact
	Neutral Impact	
	Actions to Mitigate Impact	



Additional characteristics to consider

Literacy	Positive impact - Customers do not need to use the word complaint for it to be accepted as such as per 2.2 of policy - We will carry out 'outcome calls' to provide resolution before confirming in writing	Negative impact no alternative formats available . will be developing
	Neutral impact	
Socio economic status	Positive impact - Financially excluded – clear process outlined for those with dissatisfaction with debt advice service provided - Complaints process supports issues relating to heat network billing, affordability and debt management in line with Ofgem “Ability to Pay” principles	Negative impact Risk of financial detriment if customers are unable to access or understand the complaints process or escalation routes
	Neutral impact	



Consultations

Consultation completed (what, when, outcome)	Consultation needed (what, when due)
With customers: n/a	With customers: due 2027
With colleagues: Circulated to all operational managers May 25	With colleagues: complete

Mitigating negative impacts

Outline actions being undertaken to mitigate any potential or actual negative impact identified	Create alternative formats Resolutions provided via telephone call ahead of writing to mitigate any literacy issues
Identify any further action that could be undertaken to mitigate any potential or actual negative impacts	Promote policy , highlight changes , ensure equality aspects are understood . 5-point plan utilised by complaint handlers ask about vulnerabilities Promotion of complaint process can be included in future community roadshows reaching those who may not be digitally enables Requested promotion of policy in hard copy newsletter Staff training on identifying vulnerability, particularly in relation to heat network customers and affordability concerns



Result of EIA

Tick 1	Possible Outcomes
☐	No change needed: there's no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.
☒	Adjust the approach*: EIA has identified problems and the project will be amended to ensure these problems are mitigated. Priority Services Register for Heat Network customers to be created
☐	Continue the policy: there's a potential for the policy to adversely impact some groups or help some groups more than others. However, the reasons for this can be well justified and the policy will be implemented without amendments.
☐	Remove the policy: EIA shows that the policy is having a discriminatory effect and should be stopped immediately.

Continual Monitoring

Potential triggers for early review:

Failure to raise complaints when dissatisfaction identified

Failure to ask if there are reasonable adjustments required for complaint investigation

Housing Ombudsman requirements (e.g Spotlight reports, best practice, Centre for learning, Orders, recommendations)

Ongoing commitments to develop and embed best practice

Customer feedback through the delivery of the Customer influence strategy and associated delivery plan

Customer feedback via transactional survey

Failure to meet Energy Ombudsman timescales or requirements



EIA approved by: Natalia Hadfield

Date approved: 29/09/2026