

Section C – Breaches and complaints	This section relates to breaches of the Code, and/or your processes which result in a breach of the Code.
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Compliance Area	Details	POB Response	Additional Response Space
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Breaches - Please specify the number of breaches, or alleged breaches, relating to following regulations.
For the avoidance of doubt, this includes any occasion where the nature of a complaint by a tied tenant concerns a right under the Pubs code, regardless of whether the Pubs Code itself, or individual regulation, is cited.

Part 2	Pub Entry Training Regulation 9	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Sustainable Business Plan Regulation 10	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	The Required Information Regulation 11	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Assignments Regulation 12	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Premises Regulation 13	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Short Agreements Regulation 14	Number of breaches, or alleged breaches, upheld.	0		
	Number of breaches, or alleged breaches, not upheld.	0		
	Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0		
Part 3	Rent Proposal - Duty to provide Regulation 15	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Rent Proposal - Contents Regulation 16	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Rent Proposal - When it must be provided Regulation 17	Number of breaches, or alleged breaches, upheld.	46	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	46 rent proposals were sent after the initial business plan was provided due to being in process in April 2021. Publicans all asked to reconsider business plan in light of receipt of rent proposal and obtain any further necessary advice prior to completion of the agreement.	
	Rent Proposal - Further information and advice Regulation 18	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Part 4	Duty to conduct a rent assessment proposal Regulation 19	Number of breaches, or alleged breaches, upheld.	2	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	2 x rent assessment proposals not issued due to surrenders being agreed	
	A rent assessment proposal and required information Regulation 20(1)(a) – (c)	Number of breaches, or alleged breaches, upheld.	5	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	1 x arbitration referral - new rent assessment issued as per request of the arbitrator. 4 x rent assessment proposals issued late	

	Conducting a rent assessment Regulation 21	Number of breaches, or alleged breaches, upheld.	1	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	1 x rent assessment proposal issued where the visit to the pub to collate data was over 3 months old	
Part 5	MRO - Notice Regulations 23-27	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Part 6	MRO - Procedure Regulations 28-35	Number of breaches, or alleged breaches, upheld.	2	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	1 x delay in acknowledging an MRO notice due to be sent to an unmonitored inbox. Inbox now has auto response to prevent reoccurrence. 1 x arbitration award on MRO terms	

Part 7	MRO - Independent Assessor Regulations 36, 37 and 38	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Part 8	MRO - End of Procedure Regulations 39 and 40	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Part 9	Business Development Managers Regulation 41	Number of breaches, or alleged breaches, upheld.	216	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	Out of 19,336 meeting minutes sent in the reporting period, 216 of them were sent outside of the 14-day period allowed by the Code. No complaints were raised by the tenant.	Where delays in sending meeting minutes are due to systems, IT solutions are being developed. Where delays relate to individuals these are escalated to line managers as required.
Part 10	Insurance Regulation 46	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Gaming Machines Regulation: 47	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Sale of Freehold or Long Leasehold Regulation 49	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
	Flow Monitoring Devices Regulation 51	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Part 11	Extended Protections Regulations: 52 and 53	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Part 12	Exemptions Regulations 54, 55 and 56	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Part 13	Void or Unenforceable Terms of a Tenancy or Licence Regulation 57	Number of breaches, or alleged breaches, upheld.	0	
		Number of breaches, or alleged breaches, not upheld.	0	
		Steps taken in relation to each identified breach, or alleged breach, and the outcome(s).	0	
Other	Other complaints made by tenants	Number and narrative of complaints made by tied pub tenants about their tenancy during the reporting period not specifically reported on elsewhere; including the type/subject of complaint and outcome of the complaint.	80 complaints were made directly to Ei Group Limited by a current tied pub tenant, previous tied pub tenant or tenant representative within the reporting period. All complaints were dealt with in line with our internal complaints policy. Out of the 80 total complaints, 73 required an explanation/ clarification only. Ei Group Limited took further action on the remaining 7 complaints. All complaints were resolved by the date of this report.	