2022 Clarion Housing Self-Assessment Form

Section 1 - Definition of a complaint

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.2	A complaint must be defined as: 'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.	Yes	Working with the Housing Ombudsman (HO), we have introduced an Interim Complaints Policy. Since the cyber security incident, we have been in regular contact with the HO to inform them of our progress. The interim policy covers any complaints received since Friday 17 June 2022, when the cyber incident occurred, and recognises the challenges we are currently facing. The complaints policy will continually be kept under review. You can find a copy of the interim policy by clicking the link https://www.myclarionhousing.com/contact-us This is the definition on page 1 of our Interim Complaints Policy.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Refer to Interim Complaints Policy (page 1).
1.6	if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	Interim Complaints Policy (page 3 under 'our procedure').
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	Interim Complaints Policy (page 1).
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered and these circumstances should be fair and reasonable to residents.	Yes	Interim Complaints Policy (page 1 under 'what is not a complaint').

1.9	If a landlord decides not to accept a complaint, a detailed	Yes	Interim Complaints Policy (page 2).
	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.		

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request, where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Refer to Interim Complaints Policy (page 2). In addition, we have covered this in training for our Customer Service and Customer Solutions Teams. We have included this in our induction and Positive Complaints Handling training. This training will be extended across other teams throughout 2022/23.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	

Section 2 - Accessibility and awareness

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	Interim Complaints Policy under 'making a complaint' (page 2).

2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Interim Complaints Policy page 3 under 'our procedure'. Please click on making a complaint.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Interim Complaints Policy page 2 under 'making a complaint'. Please click this link to see how to raise a complaint via our website.
2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	This is set out on page 4 of our Interim Complaints Policy under 'equality'.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	In September to end November 2021, we publicised our complaints handling policy via a leaflet and accompanying letter, which was sent to all our residents. CHG Leaflet V0.5 Sep 226 Tenants Repairs 2021.docx and complaints A4 V0 Our Interim Complaints Policy is also online, which outlines our two-stage process including what to do when our residents have exhausted our complaints process. We have shared a link online regarding the HO Code and scheme. Translations and copies in alternative formats are available on request. To improve accessibility on our website, we have introduced a new feature called Recite me. This allows customers to change contrast levels, modify the font, colours, line height or spacing of text, increase or decrease the website font size, navigate the website using a keyboard, translate the

			website into a different language and listen to the website using a screen reader.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Included in the Interim Complaints Policy and our correspondence when residents have exhausted our two-stage complaints process. In addition, we have an action to review our letter templates by the end of October 2022.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	This is in our Interim Complaints Policy under 'our procedures' section on page 4.

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect to receive complaints via those channels. Policies	Yes	Our 'Contact us' web page allows customers to make a complaint online or by any social media channel.
	should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.		Making a complaint via social media follows the same process and details can be found in our Interim Complaints Policy.

Section 3 - Complaint handling personnel Mandatory 'must'

requirements

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	

3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	Clarion has a dedicated Customer Solutions Team responsible for complaints handling. We have recently updated our positive Complaints Handling Training, which was delivered to all Customer Solutions staff who coordinate all complaints. Part of the training ensures that complaints receive the necessary attention.
3.2	the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly.	Yes	We have a centralised complaints team. Each coordinator will be required to complete a 4-week Induction training programme. Testing is undertaken throughout the programme to ensure the required competency is achieved.

Section 4 - Complaint handling principles

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	

4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt.	Yes	There is no stage '0'. We have a two-stage process. We are compliant with this in Business As Usual (BAU). It is worth noting because of the cyber security incident we have introduced an Interim Complaints policy which will be reviewed regularly.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	This has been included in our Interim Complaints Policy (page 1 under 'complaints definition').
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	This is part of our 'Positive Complaints Handling' training and 4 week induction programme.
4.7	 The complaint handler must: deal with complaints on their merits act independently and have an open mind take measures to address any actual or perceived conflict of interest consider all information and evidence carefully keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	This is part of our 'Positive Complaints Handling' training and 4 week induction programme. As part of a service review, a decision has been taken to implement a dedicated Quality Team within Customer Solutions. This team will be responsible for assessing quality on open complaints, Peer Reviews, Member Enquiries and Housing Ombudsman requests for information.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	This is set out on page 4 of our Interim Complaints Policy under 'equality'.

4.12	 The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: set out their position comment on any adverse findings before a final decision is made. 	Yes	This is set out on pages 2 and 3 of our Interim Complaints Policy under 'our principle' and 'our promise'.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	This is set out on page 3 of our Interim Customer Complaints Policy under 'our procedure'.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint.	Yes	We accept all escalated complaints.
4.15	A full record must be kept of the complaint, any review and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties and any reports or surveys prepared.	Yes	A full record is documented on our CRM system. The current exception is our Interim Complaints Policy, which outlines complaints specific to the cyber security incident.
4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	We have a policy and procedure for managing unacceptable behaviour.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	This is outlined on page 1 of our Interim Complaints Policy.

4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	
4.5	Landlords should 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 where this is reasonable.	Yes	This is outlined on page 1 of our Interim Complaints Policy.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	
4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	This is set out on page 3 of our Interim Complaints Policy under 'our principle' and 'our promise'.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	A Complaints Service Review by residents commenced in November 2021 and completed its work in February 2022 and the recommendations were tabled at our March HA Board. Key improvement actions from this service review are being taken forward. In 2022 we set up a Special Projects Group (SPG) which involves the Resident Scrutiny Committee members across all regions. Together we agreed 3 topics to review and improve which included the: Clarion complaint self-assessment form Complaints policy Complaints online learning. This work was successfully completed and the Customer Complaints Policy, Complaints Online learning and the additional information in the self-assessment reflected the 'you said, together we' approach.

			In addition, 700 of our residents took part to provide feedback on our Customer Complaints survey and the results have supported the amendments made. In 2023 we plan to conduct a review of all these topics again and compensation will be an additional review theme.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	We have conducted a service review on complaints handling which includes recommendations on continuing to improve and embed a positive complaints handling culture.
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Our restriction policy and template letters outline the appropriate restriction and cater for appropriate needs. The managing unacceptable behaviour policy is currently under review.

Section 5 - Complaint stages

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint within 10 working days of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This has been included in our Interim Complaints Policy (page 3 under 'our procedure').
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.		

Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	
Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: • the complaint stage • 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 • details of how to escalate the matter to stage two if	Yes	This is included in our Interim Complaints Policy on pages 2, 3 and 4 of our complaints procedure. It is highlighted in our promise, principles and procedure. This is included in our 'Induction Training Programme' and our 'Positive Complaints Handling workshop'.
	and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: • the complaint stage • 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 provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate. Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: • the complaint stage • the decision on the complaint • the reasons for any decisions made • the details of any remedy offered to put things right • details of how to escalate the matter to stage two if

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	All complaints will be escalated to a peer review.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section.

5.11	Property owners must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	
5.13	Landlords must respond to the stage two complaint within 20 working days of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section.
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two 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 if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section.

Stage 3

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	

5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section.
5.20	Landlords must confirm the following in writing to the resident at the completion of stage three 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 • details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied	N/A	We only have a two-stage process.

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section. We are undertaking a complaints letter template review in October 2022.
	proposed timeliness of a landlord's response.		The same same is a complainted to the first term of the same same is a complainted to the same same same same same same same sam
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the	Yes	This forms part of our complaints process in terms of reviewing the history, desired outcomes and action plan.

	background to the complaint if this will help to resolve the issue for the resident.		This is included in our 'Induction Training Programme' and our 'Positive Complaints Handling workshop'.
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section.

Stage 3

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	

5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint within 20 working days of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	N/A	No stage three.
5.19	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	N/A	No stage three.

Section 6 - Putting things right

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	This is defined in page 3 of our Interim Complaints Policy under 'our procedure' section.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	This is included in our 'Induction Training Programme' and our 'Positive Complaints Handling workshop'. We also use our discretionary compensation policy if we are unable to go beyond or meet our resident's desired outcome.
6.5	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.	Yes	

6.6	In awarding compensation, a landlord must consider	Yes	
	whether any statutory payments are due, if any		
	quantifiable losses have been incurred, the time and		
	trouble a resident has been put to as well as any		
	distress and inconvenience caused.		

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	This is set out on page 2 of our Interim Complaints Policy under 'our principles'.
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	

Best practice 'should' requirements

Code	Code requirement	Comply:	Evidence, commentary and any explanations
section		Yes/No	

7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	This has been agreed by the Housing Association Board and a Non-Executive Board member is being appointed to this lead responsibility.
7.4	 As a minimum, governing bodies should receive: Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	The Housing Association Board receives regular updates on our complaints handling performance through our operational overview reports and through our annual review of complaints handling performance.
7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	

7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:	Yes	Whilst we do not have a specific objective in relation to complaints handling, our staff have individual personal objectives that are linked to our corporate objectives and values.
	 have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments take collective responsibility for any shortfalls identified through complaints rather than blaming others act within the Professional Standards for engaging 		
	with complaints as set by the Chartered Institute of Housing.		

Section 8 - Self-assessment and compliance Mandatory 'must'

requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	This has been completed and published within timescales.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	
8.3	 Following each self-assessment, a landlord must: report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	We have complied with these points. Click here to view the latest assessment.