



Clanmil Housing Association

COMPLAINTS

Equality Impact Assessment

Consultation Document

April 2006

Please note that this document is available on request in alternative formats including:

- Large print
- Audiocassette
- Braille
- Computer Disc
- Alternative languages

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Contents

		Page
1.0	Executive Summary	4
2.0	Introduction	5-6
3.0	The Policy	6
4.0	Consideration of Available Data & Research	9-13
5.0	Assessment of Impact	13
6.0	Consideration of Measures to Mitigate Against Adverse Impact	15
7.0	Consultation	15
8.0	Next Steps	16

Executive Summary

- 1.1 Clanmil Housing Association is committed to fulfilling its responsibilities under Section 75 of the Northern Ireland Act 1998. In its Equality Scheme, the Association gave an undertaking to carry out an Equality Impact Assessment (EQIA) on each policy, or group of related policies, where screening had indicated significant issues in relation to one or more of the nine equality dimensions.
- 1.2 The Association screened all of its policies during 2004 - 05. The results of this exercise, including the proposed EQIA programme, were subject to a 12 week period of public consultation between July and September 2005.
- 1.3 The aim of the Compliments, Suggestions and Complaints policy (referred hereafter as the Complaints policy) is:

To ensure that anyone who is dissatisfied with Housing Association's services can seek redress through an effective, equitable and timely internal complaints review system.

This report provides the following information:

- Background information on the equality duties and Clanmil Housing Association
- A description of the Association's current Complaints policy
- And information on the scope of this review.
- The sources of quantitative and qualitative data considered during the review
- Assessment of the impact of the policy on the 9 equality dimensions. This includes potential differential impacts based on disability and race
- Proposed mitigating measures
- Details on consultation process
- The next stages of the EQIA

2. INTRODUCTION

Statutory Equality Duties

2.1 Section 75 of the Northern Ireland Act requires Clanmil Housing Association, in carrying out its functions, to have due regard to the need to promote equality of opportunity between:

- Persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- Men and women generally;
- Persons with a disability and persons without;
- Persons with dependants and persons without.

2.2 The Association must also, in carrying out its functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

2.3 In line with its equality scheme obligations, the Association screened all of its existing policies to assess whether they impacted on the promotion of equality of opportunity or the duty to promote good relations. The following questions were asked during the screening exercise:

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issue?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant groups.

A report describing the results of the screening process is available from the Head of Corporate Services, Clanmil Housing (see page 2)

2.4 Following this screening process and the associated consultation, the Association developed a 5-year Equality Impact Assessment programme. The Complaints policy was scheduled for assessment in year one of this programme.

2.5 This impact assessment has been carried out in accordance with the procedure outlined in the Equality guidance. The eight separate stages of the Equality Impact Assessment are:

1. Determining the aims of the policy
2. Collecting available data

3. Assessing the impact of the policy
4. Consideration of measures to mitigate any adverse impacts and/or alternative policies that might better achieve the promotion of equality of opportunity
5. Formal Consultation
6. Analysis of responses and decision by Association
7. Publication of results of the Equality Impact Assessment
8. Ongoing monitoring of adverse impact.

2.6 The purpose of conducting the Equality Impact Assessment is as follows:

- To identify adverse impacts and to consider mitigating factors which will eliminate adverse impact;
- To consider alternative policies which would better promote equality of opportunity

2.7 This document is a draft for consultation and contains details of the first four elements of the Equality Impact Assessment. The remaining stages will be implemented following consideration of consultation responses.

About Clanmil Housing Association

2.8 Clanmil Housing is a charitable Housing Association registered with the Department for Social Development. It is a voluntary non-profit making organisation.

Over the years we have developed an expertise in both building and managing housing for older people, people with disabilities and special needs. We also have experience of providing care directly and in partnership. Today we are involved in the development and management of affordable housing all over Ireland for anyone in housing need. Our housing stock is made up of sheltered accommodation, 3 residential care homes, specialised housing units and general family housing. We have over 1600 units throughout Northern Ireland and over 160 staff.

In our mission statement we “aim to be a primary provider of high quality homes at the lowest possible economic rent for everyone in housing need”. We were accredited ISO 9001:2000 in 1995, and the Investor in People Award in 2005.

3.0 The Policy

Description of Policy

The Complaints policy explains the procedure which stakeholders of the association can follow if they are not satisfied with the service they receive.

Policy Aim

3.1 The aim of the Complaints Policy is:

To ensure that anyone who is dissatisfied with Housing Association's services can seek redress through an effective, equitable and timely internal complaints review system.

Underpinning Objectives

- Providing Satisfaction to stakeholders
- Mechanism for continuous improvement
- Maintaining a good public reputation
- Provision of Equal Access to the process
- Improvement of service
- Non Recurrence of Problem
- Consistency
- Ownership of suggestions by stakeholders
- Satisfy outside parties

Scope of Review

- 3.2 The main stakeholders in relation to the policy include anyone seeking to lodge a complaint against the Association's services or any other stakeholder of the association. Stakeholders could include any of the following:

External

- Tenants/Residents (including family representatives acting on their behalf)
- Resident of agency managed supported housing schemes
- Applicants for housing
- Job applicants
- General public
- Elected representatives
- Community representatives
- Partners
- Other Associations
- NIHE
- Other statutory agencies
- S75 representative groups
- Suppliers

Internal

- Board members
- Management
- Staff

Former

- Past tenants

Ombudsman

Anyone dissatisfied with the way in which housing associations deal with complaints can make a complaint directly to the Ombudsman for an independent review.

Department for Social Development

Housing Associations are subject to a high degree of regulation with the DSD having specific responsibility for monitoring their activities. The DSD gather information on a wide range of association services including handling complaints.

Inspection and Assessment bodies.

There are also other bodies that can look at aspects of complaints brought by stakeholders.

Other Third Parties

There may be occasion to deal with third parties when reviewing complaints, for example, in relation to issues of quality of work.

Any organisation providing services on behalf of the housing association would be expected to comply with the policies of that association

This list is not exhaustive.

3.3 The Complaints policy is intrinsically linked to all of the Association's key policies and processes, depending on the nature of the complaint.

3.4 We anticipate that complaints issues have the potential to be considered during all equality impact assessments. Whilst considered to be important by the Association, the following areas do not come under the scope of this equality impact assessment.

- (a) Complaints relating to nuisance or harassment by neighbours will be dealt with separately, under the Association's Anti-Social Behaviour policy. This policy will be reviewed during the EQIA of Housing Management policies.
- (b) Complaints made by staff members about personnel matters are dealt with under the Grievance Policy. This policy will be reviewed during the EQIA of HR policies.

Legislative and Regulatory Requirements

3.5 The Association is required to comply with the following relevant legislative and regulatory requirements. For example:

- DSD Regulatory Framework
- Data Protection Act

- Housing (NI) Order 1992 (This introduced the Tenants Guarantee which covers complaints)
- Section 75 of the Northern Ireland Act 1998
- Housing Order NI 2003 (Clause 146 brought housing associations within the ambit of the Commissioner for Complaints)

3.6 In addition to Complaints generally, Clanmil Housing must also meet certain obligations, under its Equality Scheme, to ensure that complaints made about failure to meet its equality duties are dealt with effectively.

Reasons for Equality Impact Assessment

3.7 The screening report gave the following reasons for carrying out an impact assessment on the policy:

- (a) Whilst there is a complaints policy in place as our commitment to delivering an excellent customer service. The Equality Impact Assessment presented an opportunity to improve the existing policy and set a more efficient standard throughout the Housing Association sector;
- (b) The Association believes that access to services and information, including a complaints process is of high importance to S75 groups;
- (c) Clanmil Housing also believes that its complaints policy merited an equality impact assessment to demonstrate our commitment to providing an efficient and effective service to its tenants. The Association provides services to a diverse range of customers including many client groups with special needs;
- (d) Due to the absence of available data at the time of screening the policy, the decision was taken to assess actual adverse impacts during the conduct of the equality impact assessment

Implementation of the policy

3.8 The Complaints policy has been defined by the Association's Board of Management. It is implemented by all staff throughout the Association.

3.9 A copy of the policy is shown at Appendix B.

4. Consideration of available data and research

Sources of information

4.1 The following were used in considering available data relevant to the impact of the Complaints Policy.

- (a) Internal management information in relation to complaints and service users
- (b) Office for National Statistics
- (c) Northern Ireland Research and Statistics Agency
- (d) NICORE – statistics of all lettings made by the Association
- (e) Qualitative Feedback from staff
- (f) Tenant Satisfaction Surveys
- (g) Best Value service review on Complaints
- (h) Annual Report of the Assembly Ombudsman for N Ireland 2004 -05
- (i) Complainant data from Complaints register
- (j) Response to Equality Scheme Consultation by Disability Action
- (k) Equality Commission Codes of Practice

4.2 The key issues highlighted by analysis of the above data sources are presented in this section.

Profile of Service Users

4.3 Clanmil Housing currently has 1652 units of housing stock under management:

Housing with care	41
Supported and shared	70
Sheltered housing	948
General needs housing	495 (including Irish Travellers)
Category 1 – Older people	82
Scheme staff	10

The profile of tenants include:-

- Older people living in sheltered housing accommodation
- Older people living in grouped housing
- Older people who require 24 hour care
- Family housing
- Supported housing for people with dementia
- Special needs housing for people with mental health and learning difficulties

4.4 The principal sources of equality information about tenants are tenant surveys and NICORE lettings statistics.

4.5 The Association does not house anyone under the age of 16 years due to the restrictions of the common selection scheme. Details below cover only the new lettings from 2005/2006 and have been taken from the NICORE report. We are currently upgrading our IT systems to enable us to provide accurate age profile reports for all tenants.

Total new lettings	193
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Age

Age 18 - 24	25 = 13%
Age 25 – 44	56 = 29%
Age 45 – 59	19 = 9.8%
Age 60 Plus	93 = 48.2%

4.6 **Marital Status**

Married	17 = 8.8%
Unmarried	87 = 45.1%
Divorced	18 = 9.3%
Widowed	57 = 29.5%
Separated	14 = 7.3%

4.7 **Disability**

Yes	59 = 30.6%
No	134 = 69.4

4.8 **Dependants**

Care of a child	72 = 37.3%
Care of a disable person	7 = 3.6%
Care of an Elderly person	1 = 0.5%
No dependant	113 = 58.5%

4.9 **Gender**

Male	54 = 28%
Female	139 = 72%

4.10 **Ethnic group**

White	190 = 98.4%
Irish Traveller	2 = 1.1%
Black Caribbean	1 = 0.5%

4.11 **Religious Belief**

Protestant	83 = 43.2%
Catholic	96 = 50.0%
Mixed	3 = 1.6%
None	6 = 3.1%
Other	4 = 2.1%

4.12 The Association does not provide a secure tenancy to anyone under the age of 16 years due to the restrictions of the statutory housing selection scheme.

4.13 In terms of those groups identified within Section 75, Clanmil Housing would provide housing for all of the identified groups.

4.14 At present, Clanmil Housing does not collect data on political opinion or sexual orientation. The 2004 Northern Ireland Life and Times Survey indicates that 1% of respondents described themselves as gay or lesbian. A research report by Youthnet argues that analysis of the Census 2001 indicates that between 2 and 10% of the population may be lesbian, gay or bisexual.

4.15 According to the 2004 Northern Ireland Life and Times Survey 39% considered themselves to be unionist, 23% stated that they were nationalists whilst 37% stated that they were neither.

Complaints

4.16 A comprehensive management review is carried out each year and this is presented to the Senior Management Team. A Summary of the number and category of complaints received over the last four years is as follows:-

	<u>01/02</u>	<u>02/03</u>	<u>03/04</u>	<u>04/05</u>	
Maint/Dev	23	33	25	21	-4
Staff	8	7	2	4	+2
Allocations	1	4	5	0	-5
Service Charge	0	2	1	0	-1
Rent	6	0	3	2	-1
Compensation	2	0	3	2	-1
Security	6	3	2	0	-2
Others	4	7	10	5	-5
Anon	1	0	0	1	+1
Consolidated	1	4	2	1	-1
Totals		71	74	53	36
					-17

Within its Complaint Policy, Clanmil makes specific reference to how complaints will be handled if it is on the basis of equality i.e. Section 75. To date no complaints have been received.

Tenant Satisfaction Surveys

4.16.1 As part of the Tenant Satisfaction Surveys which are carried out at Clanmil Housing, these include a review of complaints where they have been received. These have, in the past, included complaints that have been handled at a local level and are not included in the figures above. However, following the Best Value Review of Complaints, the complaints that are now handled by scheme staff are

recorded and will be presented to the Management Team at the annual review in 2006.

Consultations with Section 75 Representative Groups

4.18 The following bodies, that are relevant to this review, were invited during public consultation on Clanmil Housing's Complaints Policy:

Organisation	Summary of comments received
Coalition on Sexual Orientation (COSO)	1. Complaints policy was passed to COSO for comment. However, to date, no comments have been received
Tenant Forum	2. Members of the Tenant Forum were invited to participate in the Review over a period of 12 months and provided valuable input to the process.

General Feedback

4.19 No feedback has been received to date.

Inspection/ Satisfaction Reports

4.20 As part of the Association's Quality Management System, the complaints procedures are reviewed by External Auditors at each visit (twice a year). During their last visit (November 05), they commented specifically in their report on the positive way that complaints are handled by the organisation.

Ombudsman Report

4.21 The Annual Report of the Complaints Ombudsman for Northern Ireland is reviewed on an annual basis. No negative complaints were received by the Ombudsman regarding Clanmil Housing

Internal Audit

4.22 The Complaints procedures have been included within the Associations Quality Management System since it was first introduced in 1996. The procedure is audited annually by Internal Auditors and there have been no significant observations made regarding issues involving equality

5. Assessment of Impact

5.1 This section outlines our assessment of the impact of the Association's complaints policy on the 9 Section 75 groups based on the evidence considered above.

5.2 It has become apparent, following the conduct of this EQIA, that there are very few adverse impacts in relation to the complaints policy. Most potential equality issues relate to how some customers can access the complaints service. A separate EQIA on the Association's Access and Communications policies has been carried out and the adverse impacts that have identified, and the mitigating measures proposed to address these, are detailed in that report.

5.3 Where we indicate that there is no evidence of adverse impact, this does not mean that no action will be taken. The Association is committed to promoting equal opportunities for all and excellence in customer service, and will seek, where possible, to put measures in place to ensure that all sections of society have an equal opportunity to access appropriate redress when problems occur.

5.4 Anyone wishing to make a complaint about Clanmil Housing can do so in the following ways:-

- by completing a complaints form;
- by letter
- by e-mail (using the Association's web site at www.clanmil.org) – browsealoud is available for people with a visual impairment
- in person;
- by telephone/text phone
- through a third party i.e. elected representative or a member of the person's family.

Details of specific information provided which may have a differential impact in relation to some of the nine categories is listed below.

Disability

The policy is available in alternative formats e.g. large print, braille, audio tape and computer disc. The Association also has a textphone at its head office where complaints can be channelled. The web site can also be used to register complaints

Race

Clanmil is a member of language line which provides an interpreting service. Clanmil also states in its policy that it will, where it is requested, provide information in an alternative languages. To date we have had no requests

Dependents	5.4 applies
Age	5.4 applies
Sexual orientation	5.4 applies
Gender	5.4 applies
Religious belief	5.4 applies
Political opinion	5.4 applies
Marital status	5.4 applies

6. Mitigating Measures

The Association has recently carried out an extensive review of its complaint procedures as part of the Best Value Review Process. The recommendations introduced following the review were relatively few as most of the good practice identified by the GB Complaints Ombudsman was already being applied by Clanmil at the time of its own review.

7. Consultation

- 7.1 Clanmil Housing has endeavoured to give careful consideration to the measures that might be taken to make the Complaints policy fairer. The measures outlined in section 6 are not intended to be definitive or exhaustive. The Association is planning to formally consult on its findings over a 12 week period and would welcome feedback on these proposals and any other comments that would assist us to improve the policy.
- 7.2 Clanmil Housing will ensure that it consults effectively with those groups directly affected by Complaints policy, and their representatives.
- 7.3 Staff will be available to discuss these proposals in person, by telephone, or by e-mail, as requested. Meetings may also be arranged to discuss the way forward and the Equality Impacts of this document, if required.
- 7.4 The period of consultation will end on **Friday, 1 September 2006**.
- 7.5 Comments in relation to this report should be submitted in writing to:

Head of Corporate Services/Communications Officer
Clanmil Housing
3 Waring Street
BELFAST
BT1 2DX

Tel: 028 9087 6000
Fax: 028 9087 6001

karen.stilges@clanmil.org.uk
jim.pow@clanmil.org.uk

- 7.6 Comments in any other format will also be accepted
- 7.7 If you require any further information, you may contact the Association using the contact details given in 7.5.
- 7.8 If you require information about housing associations generally or about the Joint Equality Exercise co-ordinated by NIFHA please contact

The Northern Ireland Federation of Housing Associations
38 Hill Street
Belfast
BT1 2LB
☎ 028 9023 0446
💻 www.nifha.org

8. Next Steps

- 8.1 Clanmil Housing will seriously consider all comments received when making a final decision on the recommendations of this EQIA.
- 8.2 The results of the EQIA will be published in the final report, which will be made available to all consultees. Alternative formats will be available on request.
- 8.3 A system will be established to ensure the ongoing monitoring of the impact of the policy on relevant groups.

APPENDIX A

Estimated Populations of Minority Ethnic Communities in Northern Ireland

Source: Multi-Cultural Resource Centre N-I

Community	Numbers	Main Mother Tongue Languages	Main Geographical areas within NI
Chinese ¹	7000- 8000	Cantonese, Mandarin, Hakka, English	Belfast, Craigavon, L'Derry, all NI
Indian ²	1500	Punjabi, Hindi, English, many others	Belfast, Derry and various others
African	1600	English, Swahili, Fulani, Xhosa, Arabic, Shona, Yoruba, French	Belfast, Ballymena Co. Antrim
Arabic speaking communities ³	1000- 1500	Arabic, English and many others	Belfast, Craigavon
Irish Travellers	1500	English, Gammon/ Cant/ Shelta.	West Belfast, Derry, Craigavon, Newry
Pakistani Community	700- 1000	Punjabi, Urdu, English others	Greater Belfast Craigavon
Portuguese community	700	Portuguese	Craigavon area, Tyrone, other
Bangladeshi Community	450-500	Sylheti, Bengali	North Down, Ards, Greater Belfast
Filipino community	300-350	Tagalo, English and others	Various
Persian/ Iranian community	300-350	Farsi, English	All NI
Jewish Community	230	English	North Belfast

Other communities (with estimates where available):

- **S&E Asia:** Koreans (100), Japanese (80-100), Vietnamese, Thais, Indonesians, Malaysians (140), Indochina and others, also: Australia & New Zealand
- **Central Asian:** Afghans (20), Kurds, Turkish, former Soviet Republics
- **The Americas:** US citizens, Canadians, Latin Americans (200-250) including Brazil (50), Colombia (35) and others
- **Europeans:** Dutch, French, Albanians (50), Kosovans (80-100), Spanish, Russians (50-100); Polish, Romanians, former Yugoslavia, Italians, Germans, Greeks, and many others

Notes for table:

1. The **Chinese** community includes Hong Kong and the New Territories, Malaysia, Taiwan, Singapore, and Mainland China; the majority originate from Hong Kong and are Cantonese speakers (with some Hakka speakers) for those with written Chinese the traditional form is used; for people from the mainland Mandarin is mainly spoken and the simplified written form used. All are colloquially referred to as "Chinese".

2. The **Indian** community reference here includes around 200-250 members of the Sikh community and people from Sri Lanka;

3. The **Arabic speaking communities** include Jordanians, Palestinians, Lebanese, Syrians, Egyptians, Libyans, Saudis, Iraqis, Moroccans, Algerians and others from North Africa, the Middle East and other areas.

COMPLIMENTS, SUGGESTIONS AND COMPLAINTS POLICY

This policy is available in alternative formats on request

WHY HAVE A COMPLIMENTS, SUGGESTION AND COMPLAINTS PROCEDURE?

Clanmil Housing Association aims to provide its customers with a first class service. However, there may be occasions when you are not happy about something, and, if this is the case, it is important for you to tell us.

On the other hand there will be times when you have been extremely satisfied with a particular aspect of our service and we would also like to hear of these instances.

Where a particular service is not currently provided and you feel you feel it should or, you feel a particular service could be improved the Association operates a suggestion scheme and welcomes ideas on improvements that you may have.

The aim of these procedures is to give you clear guidance on what to do if you wish to forward a compliment, suggestion or complaint to the Association. It also gives us the chance to monitor the quality of the service we provide so that we can continually work to improve it.

WHO CAN USE THE COMPLIMENTS, SUGGESTIONS AND COMPLAINTS PROCEDURE?

Anyone who receives or requests a service from the Association can use the Complaints Procedure. This includes tenants and residents, people applying for housing and anyone living in neighbouring property. The procedure is also open to people acting on your behalf, such as a Councillor, Member of Parliament, Advice Agency or Solicitor (but as you will see later if you are making a complaint, we do encourage you to try to sort things out with us first).

The Northern Ireland Commissioner for Complaints and the respective Health and Social Services Boards each have separate complaints procedures. Further details are provided in Appendices 2 and 3 of this document.

COMPLIMENTS

Where you feel you have received a service with which you have been extremely happy with we would be delighted to hear from you. Forms are held at all of our schemes and at Northern Whig House. Please complete the forms and post in the boxes provided. For those of you where forms are not held (i.e. our general need schemes) please ring Northern Whig House 028 9087 6000 and a form will be posted out to you by a member of staff

SUGGESTIONS

We are constantly looking at ways in which our service(s) can be improved and would be delighted to hear from you if you feel a service can be improved or indeed provide if this is not already the case. Suggestion forms are held at all schemes and these should be completed and placed in the boxes provided. For those of you where forms are not held (i.e. our general need schemes) please ring Northern Whig House 028 9087 6000 and a form will be posted out to you by a member of staff.

On receipt of suggestion forms they will be acknowledged by the Association and the person making the suggestion will be advised of the subsequent outcome.

COMPLAINTS - WHAT CAN YOU COMPLAIN ABOUT?

You can complain about any aspect of our service which you are unhappy with, for example:-

- *if a repair has not been carried out properly*
- *if you have not received information you have asked for*
- *if you are unhappy with the way any rent arrears have been dealt with*
- *if you feel that a member of staff, Board Member or a Contractor has not behaved reasonably towards you*
- *if you feel that your housing application has not been handled properly*
- *if you feel that you have been unfairly discriminated against*

NEIGHBOUR NUISANCE

Please note that a separate procedure exists for dealing with complaints relating to neighbour nuisance. In the event of such a problem you should first raise it with the neighbour concerned before contacting the office. However, If the problem cannot be resolved between the neighbour and yourself, you should write to your Housing Officer at Northern Whig House, 3 Waring Street, Belfast BT1 2DX Tel: 028 9087 6000. Alternatively, you can e-mail us at housing@clanmil.org.uk

We will always try to deal with complaints sympathetically, but there are some things about which we will not be able to give you information. For example, it would be wrong for us to discuss with you the details of someone else's housing application, as this would be a breach of confidentiality. We can, of course, talk to you about how our allocation procedure works.

STAGE 1

Anyone wishing to make a complaint can do so in the following ways:-

- by completing a complaints form (held at all schemes);
- by letter;
- by e-mail (using the Association's web site at www.clanmil.org);
- in person;
- by telephone;

When you make a complaint, it is important for you to let us know exactly what the problem is and how you would like to see it resolved. We would encourage you to do this in writing using the forms provided.

However, complaints made using any of the above methods will all be handled in the same way.

Complaints at Stage 1 will be dealt with by one of the following members of staff:-

Home Manager – for all matters relating to our Housing with Care schemes

Scheme Coordinator/Housing Support Worker– for all matters relating to our Sheltered Housing and Supported Housing

Development Officer* – for all issues relating to schemes under construction and newly completed schemes in defects periods

Maintenance Officer* – for all repairs and landscaping issues

Housing Officer* – for Housing Management issues and complaints from general needs tenants

Finance Officer* – for finance related matters

Communications and Health and Safety Officer* – for marketing issues and health and safety matters

Corporate Services Assistant – for personnel/employment related matters

* these staff are based at Clanmil's Head Office at Northern Whig House,
3 Waring Street, Belfast, BT1 2DX

It should be noted that where a complaint has not been resolved by Scheme Coordinators at Stage 1, and the complaint is subsequently passed to Head Office, the complaint will, on those occasions, be dealt with initially by the relevant Housing Officer at Stage 1a.

If you have made a complaint by telephone or in person, the member of staff who notes the complaint will check with you that they have taken a correct record. A copy of this record will be read to you to ensure that everyone is clear on what the complaint is about.

Whenever we have received your complaint we will write to you within three working days to acknowledge that your complaint has been received and is being dealt with. Normally we will write to you again within two weeks of receiving your complaint to let you know the outcome. Do please remember that some things may not be within our control and may be less easy to sort out. Should we be able to resolve the matter within the published timescale, the investigating officer, or delegated member of staff, will advise you accordingly. If we are not able to resolve the matter within the published timescale, we will advise you of the reason and how long it is likely to take to resolve the matter.

STAGE 2

If you feel a response received by you is not satisfactory, or you have not received a reply within the advised timescale, you may request an interview with a senior manager of the department to whom you have made a complaint – these are:-

Director of Housing
Director of Property Services
Finance Director
Head of Corporate Services
Maintenance Manager
Housing Manager

Your complaint will then be reviewed by one of the senior managers above and a response forwarded to you within 15 working days

STAGE 3

If you are dissatisfied with the response of the senior manager you are then entitled to refer the matter, in writing, to the Chief Executive, again giving details of any communications and actions to date.

The Chief Executive will acknowledge receipt of your complaint and will give respond to you within 15 working days.

TAKING YOUR COMPLAINT FURTHER

APPEAL PROCEDURE

If you are still not satisfied with the response or if you have not received a response, the matter may then be referred to the Board of Management. You should write to the Chief Executive requesting that the matter be referred to the Board of Management clearly stating the nature of the complaint. The matter will then be referred to the appropriate Board Committee for consideration. You will be advised of the likely timescale.

The Committee will review the evidence submitted and will arrange, if necessary, an interview with you to talk about the matter. In this case you are very welcome to bring

along a friend or advisor. The Committee will refer back to the Board and the Board will give you its decision in writing.

WHO WILL KNOW ABOUT MY COMPLAINT?

We will, as far as possible, respect the confidentiality of your complaint. Whilst we are looking into your complaint your name will not be divulged unless it is necessary.

You will appreciate, however, that if your complaint involves another tenant or a member of staff it may be very difficult for us to look into this without talking to that tenant or staff member. We will try to respect your wishes, but if we cannot talk to the person involved, it may not be possible for us to take action to resolve the problem.

It is not possible for us to deal with anonymous complaints under this procedure.

GETTING INDEPENDENT ADVICE

We would always hope that a problem can be sorted out before you feel it is necessary to make a complaint. However, you may feel it is important to get independent advice before you decide whether to complain to us formally. Advice agencies include:-

- *Welfare Rights Service*
- *Housing Rights Service*
- *Citizens Advice Bureau*
- *Law Centre*
- *Solicitor*

HOW DO WE RECORD AND MONITOR COMPLAINTS?

Complaints can help us as well as you! All complaints made to the Association are recorded and reported to the Chief Executive. In addition to ongoing review by the Chief Executive, the Senior Management team meet annually to review all complaints received.

FURTHER INFORMATION CAN BE OBTAINED FROM THE ASSOCIATION AT:

Northern Whig House
3 Waring Street
Belfast
BT1 2DX

Tel: 028 9087 6000 Fax: 028 9087 6001

e-mail: housing @clanmil.org.uk

www.clanmil.org

Textphone: 028 9032 9914

EQUALITY SCHEME – SECTION 75 DUTIES

From 1st April 2004, Clanmil Housing has been designated a public authority and as such has a specific responsibility under Section 75 of the Northern Ireland Act 1998.

If you feel that you would like to highlight any of Clanmil policies or procedures which, you feel, breach the nine groups designated under the Section 75 duties, please contact the Head of Corporate Services in the first instance, in writing, clearly indicating the perceived breach (where a complainant is unable to forward a written complaint, he/she should contact the Association and arrangements will be made on behalf of the complainant) .

The nine groups designated under the Equality Scheme are:-

- Religious belief
- Political opinion
- Marital status
- Age
- Race (ethnic group)
- Gender
- Dependency
- Sexual orientation
- Disability

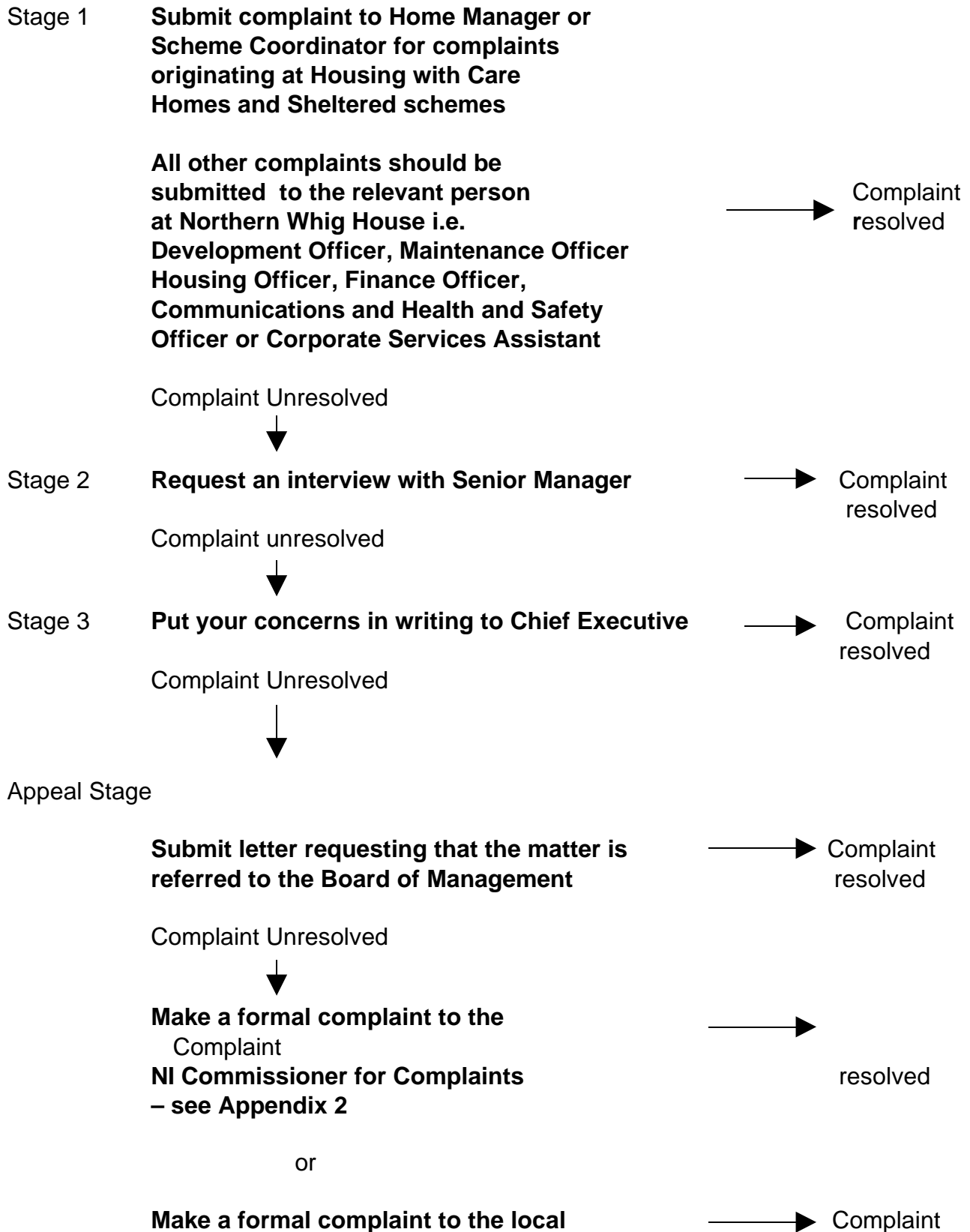
An internal investigation will be conducted and a response will be returned within one month. The complainant will be kept updated throughout the process.

If the complainant is unhappy with the outcome, he/she may speak to the Equality Commission for Northern Ireland. The Equality Commission has the power to refer the case to the Secretary of State for Northern Ireland. Clanmil Housing will cooperate fully with any investigation into the complaint.

If you require any further details please contact the Corporate Services department. The Equality Scheme for Clanmil Housing can be seen at its website at the following address:-

www.clanmil.org

COMPLAINT PROCESS



APPENDIX 2

COMPLAINTS TO THE NORTHERN IRELAND

COMMISSIONER FOR COMPLAINTS

The Northern Ireland Commissioner for Complaints provides an external complaints procedure for all registered Housing Association tenants and applicants for tenancies including those of Clanmil Housing. This is a free and impartial service and a leaflet is available from the Association's offices in Waring Street or from the Commissioner's office. It is important to note that before the Commissioner can deal with your complaint, you must have gone through the Association's own procedure. However, if you are unhappy with our procedure the Commissioner may be willing to investigate.

This procedure is open to anyone who receives a service from the Association. Residents of the Association's Housing with Care homes have access to the complaints procedure of their local Health and Social Services Board. Further details are given at appendix 3.

The contact address is:

Assembly Ombudsman for Northern Ireland
Northern Ireland Commissioner for Complaints
33 Wellington Place
Belfast
BT1 6HN

Tel: 028 9023 38212
Fax: 028 9023 4912

e-mail ombudsman@ni-ombudsman.org.uk web www.ni-ombudsman.org.uk

APPENDIX 3

COMPLAINTS TO THE LOCAL HEALTH AND SOCIAL SERVICES BOARDS

Each Health & Social Services Board has its own external complaints procedure. Please note that the Board may request that you use the Association's internal complaints procedure as detailed in this booklet in the first instance. You may use the Board's procedure if you are not satisfied with the outcome of a complaint dealt with by Clanmil Housing or if you are not satisfied with the way in which Clanmil Housing dealt with the complaint.

This procedure is open to anyone who receives a service from any of the Association's Housing With Care homes.

The addresses of the Health and Social Services Boards are:

Regulation and Quality
Improvement Authority
Eastern Health &
Social Services Board
Knockbracken Healthcare Park
Saintfield Road
BELFAST
BT8 8BH

Tel: 028 9056 3700
Fax: 028 9056 3732

For Complaints made
regarding De la Cour House
& Giboney House, Belfast

Inspection Unit Manager
Registration & Inspection Unit
Northern Health &
Social Services Board
The Beeches
76 Avondale Drive
BALLYCLARE
BT39 9EB

Tel: 028 9335 4845
Fax: 028 9335 4484

For complaints made
regarding Marriott House,
Magherafelt

