

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	A complaint must be defined as: <i>'an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.'</i>	Yes	<ul style="list-style-type: none">Complaints PolicyWebsite: Feedback • First Priority Housing Association (firstpriorityha.co.uk)	The Housing Ombudsman definition of a complaint is used within our Complaints Policy and also referenced on our website under the "What is a complaint?" section.

1.3	A resident does not have to use the word 'complaint' for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.	Yes	<ul style="list-style-type: none"> • Complaints Policy 	Contained within section 3.4-4.2 of the Complaints Policy.
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Complaints Process • Online feedback form: Feedback • First Priority Housing Association (firstpriorityha.co.uk) 	<p>Section 5 – complaints that cannot be dealt with under this Policy includes clarification for tenants on what constitutes a service request versus a complaint.</p> <p>There are also triage options available on the online feedback from on our website.</p> <p>Staff at FPHA and our managing agent have received full access to complaints process maps and training to effectively identify and define complaints and service requests respectively.</p>

1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	Complaints Policy	Section 5.1 of the Complaint Policy “If FPHA subsequently fail to respond to that service request in line with its published policy, that matter may become a complaint.”
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Slide 11 of the FPHA Complaints Training	Information and links to the Complaints Policy and webpage are always contained within surveys we conduct. Due to the nature of our tenant base, much of our engagement is carried out in-person. Staff have been provided with awareness raising training around complaints to best promote this among tenants where required, including when taking feedback.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<ul style="list-style-type: none"> Complaints Policy Website: Feedback • First Priority Housing Association (firstpriorityha.co.uk) 	Referenced in the Complaints Policy, the Easy Read guide and on the website.
2.2	<p>A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> The issue giving rise to the complaint occurred over twelve months ago. Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. Matters that have previously been considered under the complaints policy. 	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 5 of the Complaints Policy.

2.3	Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 5.11 of the Complaints Policy.
2.4	If a landlord decides not to accept a complaint, an 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. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.	Yes	<ul style="list-style-type: none"> Complaints Policy 	<p>Complaints Policy 5.12 makes specific reference to communicating the exclusion of a complaint.</p> <p>Procedural guidance created for staff to respond, explaining reasons why a specific complaint may not be considered.</p> <p>Template response contains signposting to Housing Ombudsman in the event that the tenant is unhappy with the initial response.</p>
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 5.11 states that exclusions will be at the discretion of First Priority Housing Association.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Complaints Easy Read • Website: Feedback • First Priority Housing Association (firstpriorityha.co.uk) 	Explained within Complaints Policy (Sections 4 and 6), webpage and Easy Read guide for tenants.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Complaints Easy Read • Website: Feedback • First Priority Housing Association (firstpriorityha.co.uk) 	Training has been provided to all relevant colleagues within our managing agent who deliver our services day-to-day. There is clear support available from the office-based customer contact team to ensure that all complaints are consistently recorded within our systems. There is a complaints reporting form that all colleagues have access so we again have a consistent entry point for complaints in the back office.

3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<ul style="list-style-type: none"> • Performance Reporting Framework • Annual learning from complaints report 	<p>Regular and proactive monitoring of complaints volumes in weekly operational update meetings. Also, included in the Performance Reporting Framework to Board providing oversight of complaints, but also other feedback about our services.</p> <p>The annual Learning from Complaints report is also received by Board in line with Housing Ombudsman recommendations.</p>
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Website: Feedback • First Priority Housing Association (firstpriorityha.co.uk) 	As our tenants can have learning disabilities, multiple complex needs and mental health conditions, all information is provided in an alternative Easy Read guide to better support their understanding.
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	<ul style="list-style-type: none"> • Complaints Policy 	Section 12.2 of the Complaints Policy refers directly to our membership of the Housing Ombudsman Code.

3.6	Landlords must 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.	Yes	<ul style="list-style-type: none"> • Complaints Policy 	<p>Sections 4.1 and 12.1 detail this.</p> <p>We have also conducted an Equality Impact Assessment to ensure that the Policy is accessible and allows for the support of third parties. This is particularly important given the nature of our tenant base.</p>
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Complaints Easy Read • Website: Feedback • First Priority Housing Association (firstpriorityha.co.uk) 	<p>Consistent references to the Housing Ombudsman in all complaints related materials and on our website.</p>

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Referenced within the Complaints Policy "6.4 The named Complaints Officer for FPHA will be the Head of Operations".
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	<ul style="list-style-type: none"> Complaints Policy 	<p>As a small provider, we have two members of staff, both with clear roles established within the Complaints Policy.</p> <p>We monitor the performance of our managing agent that deliver our front-facing services to tenants and our contractors. The mechanisms within this contractual arrangement provide us with the tools to resolve disputes promptly.</p>

<p>4.3</p>	<p>Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively</p>		<ul style="list-style-type: none"> • Complaints handling training • Annual Learning from Complaints report • Performance Reporting Framework • Tenant Satisfaction Measure reporting • Transactional repairs customer satisfaction surveys 	<p>Contained within the mandatory training for staff on managing complaints effectively. As a specialist, supported housing provider, additional training is provided on how to deal with tenants who may present with vulnerabilities or be distressed and upset at any time.</p> <p>The annual Learning from Complaints report will be a collaborative exercise with the managing agent to analyse complaint outcomes with a focus on service improvement.</p> <p>Monthly reports on complaints go to Board and complaint handling is covered in our Performance Reporting Framework. This ensures it has close attention and is positioned as a key performance indicator.</p> <p>Our collection for the Tenant Satisfaction Measures (both standard and Easy Read</p>
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				equivalent) provide further opportunities to regularly report back on tenant feedback, especially in areas of perceived underperformance. These themes are elaborated on in staff training events, briefings and further feedback to the Board. More transactional feedback is also now available for Repairs, a prominent area for complaints to stem from.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	<ul style="list-style-type: none"> Complaints Policy Complaints Easy Read Guide 	We have a single Complaints Policy freely available to tenants. We actively promote and encourage feedback from tenants and their advocates in general correspondence and engagement to maximise the learning opportunities available.
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	<ul style="list-style-type: none"> Complaints process (summary available on www.firstpriorityha.co.uk/complaints-feedback) Complaints Policy 	Summary guidance is available on the feedback section of the website, clearly explaining the complaints process and how to complain. Further detailed information is available in Section 8 of the Complaints Policy.
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	<ul style="list-style-type: none"> Complaints Policy 	We operate a two stage complaints process which is clearly set out both on the website and within Section 8 of the Complaints Policy itself.

5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be expected to go through two complaints processes.	Yes	<ul style="list-style-type: none"> Complaints Policy 	<p>Stage One of the process is predominantly handled by the managing agent who deliver the frontline services on our behalf.</p> <p>This is detailed within the Complaints Policy under Section 8.</p>
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	<ul style="list-style-type: none"> Complaints handling training Complaints process Complaints Policy 	<p>Full training has been provided to the staff of the managing agent who will be involved in managing the complaints process. This includes an overview of the Housing Ombudsman Code, the conditions of which are also included in our complaints process and wider Complaints Policy.</p>
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as "the complaint definition". If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<ul style="list-style-type: none"> Complaints Policy 	<p>Contained within Section 8.2.1 of the Complaints Policy.</p>

5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Complaints Process 	<p>The grounds of responsibility are highlighted throughout the Complaints Policy.</p> <p>The internal complaints process also triages complaints, identifying if we are responsible. In instances, where we are not responsible, for example the complaint may refer to the tenant's Care Provider, we will signpost and support the tenant where possible to redirect their complaint.</p>
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5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	<ul style="list-style-type: none"> • Complaints handling training 	<p>Complaints handling training has been provided to all relevant members of staff based on the Housing Ombudsman Complaint Handling Code.</p>
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5.9	Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.	Yes	<ul style="list-style-type: none">• Complaints Policy• Complaints handling training	<p>Within Section 8 of the Complaints Policy, there is clear instruction for extensions at each stage of the complaints process.</p> <p>Guidance is also reiterated in the complaints handling training that has been provided to staff.</p>
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5.10	Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a resident has disclosed. Any agreed reasonable adjustments must be kept under active review.	Yes	<ul style="list-style-type: none"> • Tenant Management System (records all tenant disabilities – regularly reviewed) • Complaints Policy 	<p>Section 8.1.2 of the Complaint Policy sets out the grounds for reasonable adjustments. As a Specialist Supported Housing provider, we regularly review the needs of tenants to ensure that we are able to engage with them in the most appropriate and effective manner available to us.</p> <p>Sections 12 refers to the Equalities Act and measures we put in place to support complainants.</p> <p>Section 14 contains a full Equality Impact Assessment including steps put in place to ensure that the Policy is accessible and equitable to all.</p>
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5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	<ul style="list-style-type: none"> Complaints Policy 	In Section 5.11 – 5.12 there is an explanation of the grounds for exclusion/ refusal to escalate and the process that will be followed in the event of any exclusions/ refusals.
5.12	A full record must be kept of the complaint, 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 relevant supporting documentation such as reports or surveys.	Yes	<ul style="list-style-type: none"> Complaints tracker 	Online complaints tracker in operation for the logging and management of complaints through the process.

5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	<ul style="list-style-type: none"> • Complaints process (summary available on www.firstpriorityha.co.uk/complaints-feedback) • Complaints Policy • Complaints Easy Read guide 	<p>Section 8.1.4 of the Complaints Policy reiterates our commitment to resolve complaints at the earliest opportunity. The same applies to any expression of dissatisfaction which is also referenced within the Policy.</p> <p>There is also clear reference to this on the feedback webpage outlining the process too complainants before they submit their complaint.</p>
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Complaints Process • Complaints handling training 	<p>Complaints Policy section 11 contains all information relating to unreasonable behaviour from complainants.</p> <p>This has been reiterated in the complaints process and the complaint handling training provided to staff.</p>

5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	<ul style="list-style-type: none">• Complaints Policy	<p>Section 11.3 refers to the Equalities Act. As we support tenants with severe learning disabilities and mental health conditions, we recognise the nuisances of their behaviour. Our Intensive Housing Management allows us to continually monitor their condition and support needs, working with Care Providers.</p> <p>This is also referenced in the Equality Impact Assessment.</p>
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	<ul style="list-style-type: none"> Complaints process (summary available on www.firstpriorityha.co.uk/complaints-feedback) Complaints Policy Complaints Easy Read guide 	<p>We continually reiterate our commitment to resolving complaints at the earliest opportunity. This is detailed in Section 8.</p> <p>Information on our website also states that we will aim to resolve complaints as quickly as possible.</p>
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 8 of the Complaints Policy.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 8 of the Complaints Policy.

6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 8 of the Complaints Policy.
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<ul style="list-style-type: none"> Complaints Policy Details for the Housing Ombudsman on www.firstpriorityha.co.uk/complaints-feedback 	<p>Section 8.1.8 of the Complaints Policy provides details of the Housing Ombudsman and clarifies the support that is available to complainants at any stage of the complaints process with us.</p> <p>All complaints related correspondence also provides details for the Housing Ombudsman.</p>

6.6	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Yes	<ul style="list-style-type: none"> Complaints Policy 	<p>Section 8.1.9 of the Complaints Policy details the process we will follow in the event of any outstanding actions.</p> <p>All actions can be tracked in our Tenancy Management System or Repairs System.</p> <p>Each complaint also has its own file to record interactions, evidence etc. relating to the complaint in one central location.</p>
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 8.1.11 states the response will cover all aspects of the complaint provided by the complainant.

6.8	<p>Where residents raise additional complaints during the investigation, these must 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, 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.</p>	Yes	<ul style="list-style-type: none"> • Complaints Policy 	<p>Section 8.1.10 of the Complaints Policy outlines the process for considering new aspects of the complaint raised by the complainant.</p>
6.9	<p>Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; <p>and</p>	Yes	<ul style="list-style-type: none"> • Complaints Policy 	<p>Section 8.1.11 of the Complaints Policy details what will be included in the response.</p> <p>This has been reiterated in the guidance and templates provided to staff to provide full and comprehensive responses.</p>

	g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	<ul style="list-style-type: none"> Complaints process (summary available on www.firstpriorityha.co.uk/complaints-feedback) Complaints Policy Complaints Easy Read guide 	<p>Staged process clearly set out within Policy in section 8.2.</p> <p>There is also reference to this on our webpage and within the Easy Read guide.</p>
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	<ul style="list-style-type: none"> Complaints process (summary available on www.firstpriorityha.co.uk/complaints-feedback) Complaints Policy Complaints Easy Read guide 	<p>Section 8.2.4 of the Complaints Policy states this and it is also repeated on the webpage and in the Easy Read guide.</p>
6.12	Residents must not be required to explain their reasons for requesting a stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.	Yes	<ul style="list-style-type: none"> Complaints Policy 	<p>Section 8.2.1 clarifies this within our Complaints Policy.</p>

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Stage 2 complaints will always be led by the Head of Operations or in their absence, the Chief Executive, offering a clear distinction from Stage 1 which is likely to be responded to by a member of staff within our managing agent.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> Complaints process (summary available on www.firstpriorityha.co.uk/complaints-feedback) Complaints Policy Complaints Easy Read guide 	Section 8.2.6 of the Complaints Policy details the 20 working day timescale. This is also repeated on the webpage and within the Easy Read guide.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	<ul style="list-style-type: none"> Complaints process (summary available on www.firstpriorityha.co.uk/complaints-feedback) Complaints Policy 	Section 8.2.7 of the Complaints Policy details the 20 working day extension timescale. The webpage also confirms the extension timescales and process.

6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 8.2.7 of the Complaints Policy confirms that the details of the Housing Ombudsman will be provided at the point of agreeing an extension with the complainant.
6.17	A complaint response must be provided 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 promptly with appropriate updates provided to the resident.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 8.2.8 of the Complaints Policy details this.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 8.2.9 of the Complaints Policy quotes this section of the Housing Ombudsman Code.

6.19	<p>Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:</p> <ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied. 	Yes	<ul style="list-style-type: none"> • Complaints Policy • Complaint response templates 	<p>Section 8.2.10 of the Complaints Policy refers to this.</p> <p>Complaint response templates are also set out in this way to ensure that staff are able to provide comprehensive responses that comply with all aspects of the Housing Ombudsman Code.</p>
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6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	<ul style="list-style-type: none">• Complaints Policy• Complaints process	<p>Clarified within Section 8.2.4 of the Complaints Policy.</p> <p>Stage 2 complaint responses will always be led by the Head of Operations or in their absence (or more appropriate) by the Chief Executive. Appropriate staff members within the managing agent may also be asked to be involved in the investigation and this is detailed within our internal complaints process.</p>
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Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	<p>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. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 	Yes	<ul style="list-style-type: none"> • Complaints Policy • The complaints webpage “putting things right” section www.firstpriorityha.co.uk/complaints-feedback 	<p>Section 7.2 of the Complaints Policy refers to these possible remedies. Note, this is a guide to potential remedies and is not exhaustive as each complaint and the remedy will be taken on its own merit.</p> <p>This is also reinforced on our webpage.</p>

7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	<ul style="list-style-type: none"> Complaints Policy 	Section 7.3 of the Complaints Policy refers to this.
7.3	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	<ul style="list-style-type: none"> Complaints Policy The complaints webpage “putting things right” section www.firstpriorityha.co.uk/complaints-feedback 	Section 7.5 of the Complaints Policy quotes the Housing Ombudsman Code directly and also explained in the “putting things right” section of the webpage.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<ul style="list-style-type: none"> Complaints Policy The complaints webpage “putting things right” section www.firstpriorityha.co.uk/complaints-feedback 	Section 7.3 of the Complaints Policy and also referenced in the “putting things right” section of the webpage. Guidance from the Housing Ombudsman is regularly monitored, with policies and practice reviewed where required.

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's 	Yes	<ul style="list-style-type: none"> • Complaints Policy • How we deal with complaints section of webpage: www.firstpriorityha.co.uk/complaints-feedback 	<p>The Complaints Policy, Section 14 outlines the process for reporting and monitoring of complaints handling.</p> <p>The webpage also issues a statement on how we prioritise complaints, take learning from them and report back to tenants and partners on performance.</p>

	performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.			
8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	<ul style="list-style-type: none"> Complaints Policy Performance section of the website, accessed via: www.firstpriorityha.co.uk/complaints-feedback 	Section 14.2 of the Complaints Policy outlines the approach to this. The first report will be due 1 March 2025 at the end of our financial year.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	N/A	No evidence required
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	N/A	No evidence required

8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	N/A	No evidence required
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Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Performance section of the website, accessed via: www.firstpriorityha.co.uk/complaints-feedback 	<p>Section 14 of the Complaints Policy details the process for learning from complaints and reporting back on this to tenants and partners.</p> <p>The website also has a performance section for the annual service improvement report to be issued.</p> <p>Each complaint also has service improvement related remedies such as policy or process changes as options to consider and improve thereafter (see Section 7).</p>

9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	<ul style="list-style-type: none"> • Complaints Policy • Performance section of the website, accessed via: www.firstpriorityha.co.uk/complaints-feedback 	<p>Statement on webpage available that reiterates our commitment to a positive approach to complaint handling.</p> <p>Also referenced in Section 14.1 of the Complaints Policy.</p>
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.	Yes	<ul style="list-style-type: none"> • Complaints Policy 	Section 14.2 of the Complaints Policy.
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	<ul style="list-style-type: none"> • Complaints Policy 	Section 6.4 of the Complaints Policy confirms the Head of Operations as the named Complaints Officer.

9.5	In addition to this a member of the governing body (or equivalent) must be 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').	Yes	<ul style="list-style-type: none"> • Complaints Policy 	Andrew Newens will be the named member responsible for complaints (Section 6.5 of the Complaints Policy).
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	<ul style="list-style-type: none"> • Performance Reporting Framework • Annual service improvement reports 	The MRC will receive monthly reports on complaints performance as well as other insight from tenant feedback. They will also have sign off of the annual service improvement report.

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<ul style="list-style-type: none"> • Performance Reporting Framework • Annual service improvement reports 	See above.
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9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body. 	Yes	<ul style="list-style-type: none"> • Consumer Standards • Monthly performance meetings 	<p>Compliance with the Regulator for Social Housing’s Consumer Standards (the Tenant Empowerment standard) and also those relating to professional competency and conduct once developed.</p> <p>Other standard objectives feature in 121s.</p> <p>Objectives are reiterated with our managing agent who are responsible for the delivery of our day-to-day frontline services.</p> <p>We also conduct monthly operational performance meetings with a standing agenda item on complaints handling and learning from tenant feedback (both formal complaints and other insight).</p>
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