

2023

Complaints & Service Improvement Report



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STATEMENT FROM OUR BOARD

“First Priority Housing Association are a values led organisation, committed to providing a good standard of service to our tenants. Our tenants have some of the most complex needs, as we specialise in providing homes to people with learning disabilities and long-term, ongoing mental health needs.

We want to ensure that all tenants’ voices are heard, with complaints handling and learning from complaints being a key component of that.

The Annual Complaints and Service Improvement Report shows that, whilst we are compliant with the Complaints Handling Code, there are still areas for us to improve upon. We received one complaint in 2023-24. We understand the barriers that tenants may face in communicating complaints, so want to work moving forward on creating more avenues for them to let us know about any issues or dissatisfaction. This has been a key learning of the last 12 months.

As a Board, we want to see more feedback from tenants and will be receiving updates on both complaints and other feedback at every Board meeting as part of our operations reporting. This will help us to monitor performance effectively.”



Iain Simm, Board Chair

OUR VALUES, YOUR SERVICES

First Priority Housing Association is a Specialist Supported Housing provider. We provide homes and services to tenants that have a range of complex needs.

Our approach to service delivery is driven by our values to be a Caring, Honest, Accountable and Trustworthy organisation, working with our partners. The delivery of our services will reflect the individual needs of each of our tenants.

INTRODUCTION

First Priority Housing Association are a specialist supported housing provider. As a registered provider of social housing and member of the Housing Ombudsman's Complaint Handling Code, we are required to publish an annual Complaints and Service Improvement Report.

We are committed as an organisation to providing good services to tenants that are underpinned by our values of being Caring, Honest, Accountable and Trustworthy in all we do. We believe these are strong values to have in inspiring a positive and accessible complaint handling culture.

If a formal complaint is made, it follows our Complaints Policy and associated process, which is made up of two stages. If the complainant remains dissatisfied, they then have the option to raise their complaint with the Housing Ombudsman.

This report presents our annual complaints performance and service improvement report for 2023-24.



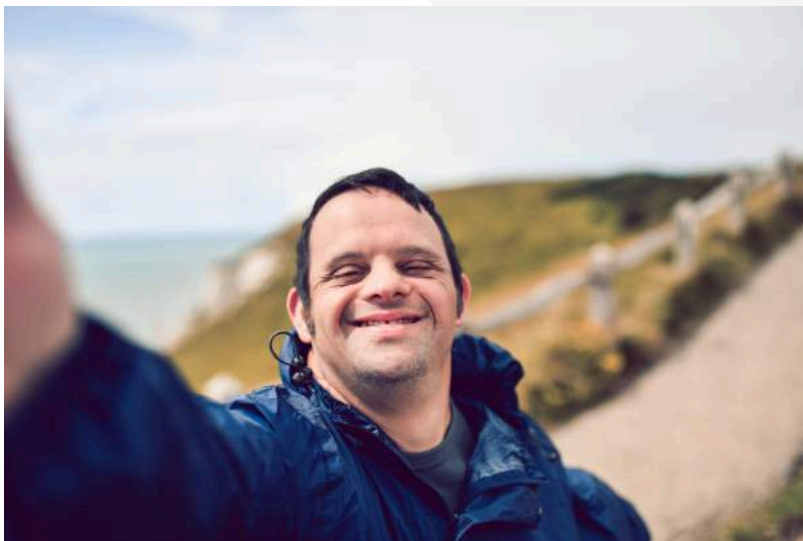
ABOUT THIS REPORT

The Social Housing (Regulation) Act 2023 provided the Housing Ombudsman with a legal duty to monitor registered providers compliance with their Complaint Handling Code. These new powers came into effect on 1 April 2024.

As a registered provider, we are obliged to follow this Code by law. In doing so, we must produce an annual complaints performance and service improvement report containing:

- the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.
- 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;
- any findings of non-compliance with this Code by the Ombudsman;
- the service improvements made as a result of the learning from complaints;
- any annual report about the landlord's performance from the Ombudsman; and
- any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

This report must be reported to our Board, submitted to the Housing Ombudsman and published on our website alongside other relevant complaints information.



www.firstpriorityha.co.uk/complaints-feedback

REVIEW AGAINST THE COMPLAINT HANDLING CODE

Following the appointment of a new Head of Operations in September 2023, we commenced a **full and comprehensive review of our complaints handling** to ensure compliance with the Code. This covered all systems, processes, people and data.

This was a timebound exercise to coincide with the release of the revised Housing Ombudsman Code and new Consumer regulation from the Regulator of Social Housing, live as of 1 April 2024.

REVIEW RECOMMENDATIONS



- We needed to update the Complaints Policy to better reflect the new Housing Ombudsman Complaints Handling Code.
- We had no formal approach to gesture of good will payments, should they be required.
- There were changes in the staffing arrangements within our managing agent, expanding the number of people requiring training specific to our Complaints Policy than what was previously needed.
- We believed the low volume was due to potential barriers faced by tenants in being able to vocalise complaints due to the nature of their disability, condition or needs.
- Given the volume no specific system to log and record complaints was in place.
- We needed there to be more routes for people to be able to provide feedback, including to make a complaint direct to us as the landlord.
- Once a revised policy was approved, there was a need to be a process review to ensure that the correct steps were being taken to meet the requirements of the policy.
- We needed to create mechanisms to collect more feedback from a range of sources across the organisation.
- We need more regular reporting on complaints and feedback through to our Board, for it to be scrutinised and contribute to decision-making.

REVIEW AGAINST THE COMPLAINT HANDLING CODE (CONTINUED)

Summary

The review found that there were opportunities to improve our complaint handling across our people, processes, systems and data. We had historically received a low number of complaints, including for this reporting period. This has been unusually low compared to peers. This is also an issue that has been identified by our Board as part of the review. Addressing the accessibility of our complaints process was the main priority in designing solutions and improvements moving forward.

ACTIONS TAKEN

1. Reviewed and reissued our Complaints Policy to cover all aspects of the Code.
2. Introduced new Discretionary Payments Policy to assist in cases where gesture of good may be necessary as part of a remedy/ resolution to complainants.
3. Specified and delivered complaint handling training to all relevant staff within our managing agent. This included a section on how to identify complaints using the Housing Ombudsman's definition of a complaint. It also took into account how our tenants may present complaints given their disabilities and/ or needs. Feedback from Support Provider partners is also a critical component of this, with staff understanding complaints can also be given by others associated to the tenant.
4. Created a new logging system to record complaints and associated information. This promotes better record keeping and monitoring of individual complaints.
5. Created a new feedback webpage containing all relevant complaints information and new routes for tenants and partners to submit complaints directly to us.
6. New process maps created for colleagues to utilise, providing consistency when handling complaints.
7. Created new methods to collect tenant feedback including taking part in the Tenant Satisfaction Measures pilot for smaller providers. This included the introduction of Easy Read surveys for all tenants and transactional repairs surveys.

REVIEW AGAINST THE COMPLAINT HANDLING CODE (CONTINUED)

Since the conclusion of the review in January 2024 and the actions taken above, there were other developments that will contribute to improving our position.

PERFORMANCE REPORTING FRAMEWORK



The creation and introduction of a new performance reporting framework is now providing us with further insight into our operational performance. This is reported on both weekly and monthly, with areas of underperformance being reviewed alongside complaint and other satisfaction data to understand the impact that this underperformance is having on tenants. The next phase of this framework will include the introduction of exception reporting for any areas identified as being off-target or showing high levels of dissatisfaction among tenants and partners. This is presented to Board as a standing item at each Board meeting.

We anticipate that this work will lead to an increase in the number of formal complaints received for 2024-25. This would mirror the experience of other social housing providers who have seen increases in complaint numbers after completing reviews and raising awareness levels among tenants of the complaint handling process. This is especially important for us with the nature of our tenant base and the difficulties they can face in communicating.

QUANTITATIVE & QUALITATIVE COMPLAINTS ANALYSIS FOR 2023-24

We received one formal Stage One complaint during the period.

The background

The complaint was received at Stage One and was responded to within the 10-day timeframe outlined in our Complaints Policy. The complaint itself was in relation to a drainage issue that had been causing issues for the tenants on site resulting in an unpleasant smell had been caused by a blockage in the drainage system. The complainant felt that we had not responded swiftly to the reported issues.

The process

As per Stage One of our Complaints Policy, the managing agent conducted an initial investigation. This involves a Housing Manager contacting the complainant to understand their complaint and expectations regarding the investigation. A full investigation was then undertaken by the Housing Manager

Findings

The investigation found that reports had been responded to, but that this was a challenging, complex case. The drainage system had been blocked by the disposal of wipes and other non-flushable items being disposed of down the toilets at the property. Engineers also found that whilst there were improvements that could be made to the drainage system, the main cause of the issues were not the fault of us as a landlord.

Learning gained

There were some potential issues in the process for recording repairs. We operate through a network of Housing Officers who conduct intensive housing management visits and property inspections. Repairs can therefore be reported via the Housing Officer and through our contact centre. The complainant had referred to occasions where they had reported repairs which were not aligning on our records. We have implemented a new property inspection reporting system in place whereby all repairs must be raised by the Housing Officer before completing their inspections in the system. This helps to ensure an accurate record is being created and facilitate greater transparency with the schemes.

QUANTITATIVE & QUALITATIVE COMPLAINTS ANALYSIS FOR 2023-24 (CONTINUED)

With regards to the complaint handling process itself, there were also learnings. At the time of receiving the complaint, there was no system for recording complaints in a consistent manner. This complaint was received by email directly to our managing agent. The response was also then sent back to the complainant on email. There was no set format to the email. Whilst this does not breach the Housing Ombudsman code, we have now developed corporate templates to be attached to emails or posted out to the complainant. There has also been a new complaints logging system introduced to support the consistent logging and tracking of complaints.

The complaint was responded to within two working days, meeting the timescales prescribed by the Housing Ombudsman Complaint Handling Code.

Outcome

The complaint was not upheld.

Accepting complaints

There were no instances in which we did not accept a complaint.



1
COMPLAINT RECEIVED



100%
RESPONDED
TO
ON TIME



4
LEARNING
POINTS
IDENTIFIED

FINDINGS OF NON-COMPLIANCE WITH THE HOUSING OMBUDSMAN

There were no findings of non-compliance from the Housing Ombudsman.

SERVICE IMPROVEMENTS

- MADE AS A RESULT OF LEARNING FROM COMPLAINTS

As we received one complaint in 2023-24, it is difficult to identify any trends as you would when experiencing higher volumes of complaints. Most of our learnings therefore relate to our complaints process in general.

Better communication with tenants

It was identified, from the one complaint we received, that there was an opportunity to improve communication with tenants and Support Providers around drainage. Following investigation into the issues at the affected property, it was discovered that the blockages were in part being caused by misuse of the drainage system. This was a common occurrence with other Support Providers elsewhere in our properties. Regular property inspections help to identify any immediate issues and Officers are able to reissue guidance to support partners.

Improve recording of the complaints

We also recognise that all the channels available to tenants and partners to report issues must lead to consistent reporting of issues and recoding of them in our systems. We have improved our property inspection reporting, moving to fully electronic reporting that is better supported by the Housing Administration team, who can log any repairs or issues that arise from visits. This reduces the risk of issues being missed or taking longer than expected to respond to. Both risks that we may have been exposed to and were suggested in this complaint, albeit we had no substantive evidence of this happening.

SERVICE IMPROVEMENTS

Improve accessibility of the complaints process

More broadly, we do also acknowledge and understand that due to the nature of the tenants we support and provide homes to, there can be barriers and challenges to submitting complaints. We need to be mindful of this as their landlord. We must ensure that our Complaints Policy and processes are as accessible as possible. We will continue to monitor the number of complaints and levels of feedback we receive, with this being formally introduced as a mandatory item within the Head of Operations report to Board and wider monthly performance reporting.

The small number of complaints received in 2023-24 may have been influenced by the above point. This was a key consideration within our complaints review and the subsequent recommendations.

Training for staff

We believe that the training that has been provided to colleagues within our managing agent will support them to be proactive in identifying complaints and assist them in helping tenants to communicate their complaints and concerns to us. This will be facilitated through our intensive housing management approach and the new webpage created on our website. We want to reduce the barriers faced by tenants.

Opportunities for feedback (from tenants and partners)

We will create more opportunities for tenants and partners to provide feedback to us. This could be through their Housing Officers as alluded to above, the use of our website or through the completion of our tenant satisfaction surveys. These will be both perceptions based and transactional, following the completion of repairs, which we know to be a source of complaints for the sector.

Measuring and reporting on tenant satisfaction levels

As part of our commitment to hearing the voice of our tenants and taking meaningful action, we also volunteered to participate in the pilot for smaller providers for the Tenant Satisfaction Measures. We plan to use the learning from this to roll out Easy Read satisfaction surveys to all our tenants throughout this forthcoming year. This will provide another opportunity for tenants to raise any complaints, concerns or share wider feedback.

SERVICE IMPROVEMENTS

Increasing accessibility for tenants in providing feedback

In a further drive to increase accessibility, these surveys and feedback option will also be offered to appointees, Support Workers and Social Workers of the tenants, maximising the chances of receiving more feedback to drive service improvement and organisational learning.

Learning from feedback and insight with colleagues

Feedback and insight sessions will be held with colleagues in our managing agent to create solutions to any challenges raised by tenants or areas of concern. These sessions will be held bi-annually in line with submissions to the Housing Ombudsman and Regulator for Social Housing.

Engaging with best practice beyond housing

We will also continue to engage with experts in the learning disability and mental health sectors to seek out best practice when it comes to engaging with customers (tenants).

Engaging with best practice within specialist supported housing

Our service review and subsequent engagement with other specialist supported housing providers has evidenced that other providers also have low numbers of complaints. We are members of the Specialist Supported Housing Network and are committed to working with our counterparts there to tackle the issue of under-reporting and the barriers experienced by tenants in submitting complaints.



HOUSING OMBUDSMAN REPORTING

- ANY ANNUAL REPORT ABOUT THE LANDLORD'S PERFORMANCE

We have had no annual report from the Housing Ombudsman.

- ANY OTHER RELEVANT REPORTS OR PUBLICATIONS PRODUCED BY THE HOUSING OMBUDSMAN IN RELATION TO THE WORK OF THE LANDLORD

We have had no other relevant reports or publications by the Housing Ombudsman in relation to our work



OUR COMPLAINT HANDLING ACTION PLAN

The purpose of this annual complaint handling and service improvement report is to use the learning we have gained and improve the complaint handling service we provide as a result. As such, we have summarised the key actions we will take as a direct result of the learning points raised both within our service review and the complaint we received.

No.	Action	Deadline for completion/ action
1	New feedback webpage	1 April 2024
2	Promotion of webpage to tenants and partners	1 April 2024 onwards
3	Introduction of transactional feedback surveys for repairs	30 April 2024
4	Introduction of Easy Read tenant satisfaction surveys	1 July 2024 onwards
5	Engagement with wider learning disability and mental health sectors on increasing engagement with tenant base	30 May 2024 onwards
6	Sharing of tenant and partner feedback insight days (with managing agent colleagues)	1 October 2024
7	Refresher of complaints handling training for staff	30 March 2025

HOUSING OMBUDSMAN SELF-ASSESSMENT

Our full self-assessment can be found on our website at www.firstpriorityha.co.uk/performance Here you will also be able to see our wider performance as an organisation.

OR

Scan the QR code below:



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