

## 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"> <li>Complaints Policy</li> </ul> Website: <a href="https://www.firstpriorityha.co.uk/feedback">Feedback • First Priority Housing Association (firstpriorityha.co.uk)</a>	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"> <li>Complaints Policy</li> </ul>	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	Complaints Policy <ul style="list-style-type: none"> <li>Complaints Process</li> <li>Online feedback form: <a href="https://www.firstpriorityha.co.uk/feedback">Feedback • First Priority Housing Association (firstpriorityha.co.uk)</a></li> </ul>	Section 5 – complaints that cannot be dealt with under this Policy includes clarification for tenants on what constitutes a service request versus a complaint.  There are also triage options available on the online

				<p>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> <p>A new Complaints and Safeguarding Manager has been recruited to support in triaging complaints before they are referred to FPHA.</p>
1.5	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	<p>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.”</p> <p>Staff have received additional complaints training to support tenants in submitting complaints where necessary and making them aware of the process.</p>
1.6	<p>An expression of dissatisfaction with</p>	Yes	<ul style="list-style-type: none"> <li>Slide 11 of the FPHA</li> </ul>	<p>Staff received additional</p>

	<p>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.</p>		<p>Complaints Training</p>	<p>training and briefing sessions this year on complaints handling.</p> <p>Staff conduct in-person Easy Read surveys, where tenants are given the opportunity to provide qualitative feedback. If any responses are negative or could be improved, tenants are advised on complaints. Support Workers are also often present and are made aware of how they can also submit complaints whenever necessary.</p>
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## 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"> <li>Complaints Policy</li> </ul> Website: <a href="https://www.firstpriorityha.co.uk">Feedback • First Priority Housing Association (firstpriorityha.co.uk)</a>	Referenced in the Complaints Policy, the Easy Read guide and on the website.  This year, we did accepted all complaints from complainants.
2.2	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: <ul style="list-style-type: none"> <li>The issue giving rise to the complaint occurred over twelve months ago.</li> <li>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.</li> <li>Matters that have previously been considered under the complaints policy.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	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"> <li>Complaints Policy</li> </ul>	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"> <li>Complaints Policy</li> </ul>	<p>Complaints Policy 5.12 makes specific reference to communicating the exclusion of a complaint.</p> <p>All complaint templates for responses include Housing Ombudsman information as mandatory information.</p> <p>Information regarding the Housing Ombudsman is also included on our website and our Annual Complaints Handling and Service Improvement report.</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"> <li>Complaints Policy</li> </ul>	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"> <li>• Complaints Policy</li> <li>• Complaints Easy Read</li> <li>• Website: <a href="http://firstpriorityha.co.uk">Feedback • First Priority Housing Association (firstpriorityha.co.uk)</a></li> </ul>	<p>Explained in our Complaints Policy (Sections 4 and 6), webpage and Easy Read guide for tenants.</p> <p>We also conduct Easy Read tenant satisfaction surveys. These are offered to all tenants at least once per year, as well as transactional surveys following repairs being completed. Where negative feedback is received, tenants can be supported to submit complaints or additional service requests. The results of these surveys are reviewed by management every month.</p>
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"> <li>• Complaints Policy</li> <li>• Complaints process</li> </ul>	We have a range of channels available for tenants and those supporting them to submit complaints. This includes over the phone, through the website, email or in-person

				<p>at any of visits. We visit properties every 6-8 weeks. An additional monthly call is made to Support Providers which is another opportunity to collect feedback.</p> <p>Beyond this, our Complaints Process clearly identifies the responsible person for complaints within FPHA. This is also referred to in our Complaints Policy.</p>
3.3	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>• Performance Reporting Framework</li> <li>• Annual learning from complaints report</li> </ul>	<p>We have experienced an increase in the number of complaints received this year in comparison to last year.</p> <p>We see this as a positive. It shows that there is a greater awareness among tenants and Support Providers on how and when to complain.</p> <p>We monitor the number of complaints received and responded to in our performance reporting framework and monthly performance meetings with our managing agent.</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"> <li>• Complaints Policy</li> <li>• Easy Read Complaints Policy</li> <li>• Website: <a href="https://www.firstpriorityha.co.uk/feedback">Feedback • First Priority Housing Association (firstpriorityha.co.uk)</a></li> </ul>	<p>Our Easy Read version of the Complaints Policy clearly explains the two stages of our complaint process.</p> <p>Our complaint response letters always detail the next possible stage for their complaint to be handled.</p>
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"> <li>• Complaints Policy</li> </ul>	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"> <li>• Complaints Policy</li> </ul>	<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"> <li>• Complaints Policy</li> <li>• Complaints Easy Read</li> <li>• Website: <a href="https://www.firstpriorityha.co.uk/feedback">Feedback • First Priority Housing Association (firstpriorityha.co.uk)</a></li> </ul>	References to the Housing Ombudsman in all complaints collateral and on our website.

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"> <li>• Complaints Policy</li> </ul>	Referenced within the Complaints Policy "6.4 The named Complaints Officer for FPFA 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"> <li>• Complaints Process</li> </ul>	<p>The complaints process details how information on complaints flows between the managing agent and FPFA.</p> <p>We altered our process this year and we now manage the whole complaints process from start to finish.</p>
4.3	Landlords are expected to prioritise complaint handling and a culture of	Yes	<ul style="list-style-type: none"> <li>• Complaints handling training</li> <li>• Annual Learning from</li> </ul>	Our complaints briefings and training clearly outline our

	<p>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>		<p>Complaints report</p> <ul style="list-style-type: none"> <li>• Performance Reporting Framework</li> <li>• Tenant Satisfaction Measure reporting</li> <li>• Transactional repairs customer satisfaction surveys</li> </ul>	<p>approach to complaint handling and how our values should be embedded within this.</p> <p>Learning from complaints is a standing agenda item at our monthly performance meetings, where we discuss any complaints received and responded to.</p> <p>All housing officers have a role to play in conducting our Easy Read tenant satisfaction surveys.</p> <p>Whilst we have seen an increase in the number of complaints received this year, these have been adequately resourced. We made changes to our complaints process, where we now manage the entire process due to concerns with some complaints not being responded to on time earlier in the year. Since then, all complaints have been responded to on time.</p>
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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"> <li>Complaints Policy</li> <li>Complaints Easy Read Guide</li> </ul>	<p>There is a single complaints policy.</p> <p>Tenants can be supported by others to make complaints. Tenants receive an Intensive Housing Management service which also helps to build a positive ongoing relationship with tenants.</p>
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"> <li>Complaints process (summary available on <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a>)</li> <li>Complaints Policy</li> </ul>	<p>Section 8 of the Complaints Policy explains the different routes that can be taken to resolve complaints.</p> <p>All our complaints this year have been resolved at Stage 1 of the process.</p>
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"> <li>Complaints Policy</li> </ul>	<p>Section 8 of the Complaints Policy details our two stage process.</p>
5.4	Where a landlord's complaint	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	<p>We have amended our</p>

	<p>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.</p>			<p>complaint handling process part way through this year so that both stages of the complaints process are managed by FPHA directly. The process has stages included to liaise with our managing agent and this meets the mandatory timescales for complaint responses as per our policy and the Housing Ombudsman Complaint Handling Code.</p>
5.5	<p>Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.</p>			<p>No longer applicable</p>
5.6	<p>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.</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Complaints Policy</li> </ul>	<p>Contained within Section 8.2.1 of the Complaints Policy.</p>
5.7	<p>When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for</p>	<p>Yes</p>	<ul style="list-style-type: none"> <li>• Complaints Policy</li> <li>• Complaints Process</li> </ul>	<p>The process for identifying this is set out within our complaints process.</p>

	and clarify any areas where this is not clear.			We have had one complaint received this year that was not the responsibility of FPFA, but this was clearly explained and we offered wider support in submitting a complaint to the responsible company.
5.8	At each stage of the complaints process, complaint handlers must: <ul style="list-style-type: none"> <li>a. deal with complaints on their merits, act independently, and have an open mind;</li> <li>b. give the resident a fair chance to set out their position;</li> <li>c. take measures to address any actual or perceived conflict of interest; and</li> <li>d. consider all relevant information and evidence carefully.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Complaints handling training</li> </ul>	Complaints handling training has been provided to all relevant members of staff based on the Housing Ombudsman Complaint Handling Code.
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	Complaints Policy Complaints handling training	Within Section 8 of the Complaints Policy, there is clear instruction for extensions at each stage of the complaints process.
5.10	Landlords must make reasonable adjustments for residents where	Yes	<ul style="list-style-type: none"> <li>• Tenant Management System (records all tenant disabilities –</li> </ul>	Section 8.1.2 of the Complaint Policy sets out

	<p>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.</p>		<p>regularly reviewed)</p> <ul style="list-style-type: none"> <li>• Complaints Policy</li> </ul>	<p>the grounds for reasonable adjustments.</p> <p>We monitor the needs of our tenants on a monthly basis as a minimum. This ensures our services can meet their needs. We also work closely with Support Providers to do this.</p> <p>Sections 12 makes reference 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>
5.11	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy</li> </ul>	<p>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.</p>

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"> <li>• FPHA Complaints Tracker</li> </ul>	<p>There is a Microsoft List set up for the recording, monitoring and management of complaints.</p> <p>This delivers all the necessary components set out here.</p>
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"> <li>• Complaints process (summary available on <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a>)</li> <li>• Complaints Policy</li> <li>• Complaints Easy Read guide</li> </ul>	<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	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy</li> <li>• Complaints Process</li> <li>• Complaints handling training</li> </ul>	Complaints Policy section 11 contains all information relating to unreasonable behaviour from

	representatives. Landlords must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			complainants.
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"> <li>Complaints Policy</li> </ul>	<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>

## 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"> <li>Complaints process (summary available on <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a>)</li> <li>Complaints Policy</li> <li>Complaints Easy Read guide</li> </ul>	Section 8 of our Complaints Policy and information on our website outlines our commitment to resolve complaints at the earliest stage possible.
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <b><u>within five working days of the complaint being received.</u></b>	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	Section 8 of the Complaints Policy.  100% of complaints received in 2023-24 were acknowledged within 5 working days.
6.3	Landlords must issue a full response to stage 1 complaints <b><u>within 10 working days</u></b> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	Section 8 of the Complaints Policy.  We received 20 stage 1 complaints in 2023-24 and no stage 2 complaints. All complaints were either

				responded to within 10 working days or subject to an agreed extension (2 cases).
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"> <li>Complaints Policy</li> </ul>	<p>Section 8 of the Complaints Policy.</p> <p>2 complaints of the 20 received were subject to an extension. The response was then sent within the new agreed timescale.</p>
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"> <li>Complaints Policy</li> <li>Details for the Housing Ombudsman on <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></li> </ul>	<p>Section 8.1.8 of the Complaints Policy provides details of the Housing Ombudsman.</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"> <li>Complaints Policy</li> </ul>	<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 are outlined in the response. These are also recorded in the relevant systems.</p>

				Each complaint has its own case record on our complaints tracker. This allows all correspondence relating to the complaint to be saved in one central location.
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"> <li>Complaints Policy</li> </ul>	<p>Section 8.1.11 states the response will cover all aspects of the complaint provided by the complainant.</p> <p>All responses confirm the points that will be covered following the acknowledgement of the complaint (as per our complaint process)</p>
6.8	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.	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	Section 8.1.10 of the Complaints Policy outlines the process for considering new aspects of the complaint raised by the complainant.
6.9	Landlords must confirm the following in	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	Section 8.1.11 of the

	<p>writing to the resident at the completion of stage 1 in clear, plain language:</p> <ol style="list-style-type: none"> <li>the complaint stage;</li> <li>the complaint definition;</li> <li>the decision on the complaint;</li> <li>the reasons for any decisions made;</li> <li>the details of any remedy offered to put things right;</li> <li>details of any outstanding actions; and</li> <li>details of how to escalate the matter to stage 2 if the individual is not satisfied with the response.</li> </ol>			<p>Complaints Policy details what will be included in the response.</p> <p>All complaint responses have templated guidance covering these aspects to ensure they are included in the response.</p>
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## Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	<p>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.</p>	Yes	<ul style="list-style-type: none"> <li>Complaints process (summary available on <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a>)</li> <li>Complaints Policy</li> <li>Complaints Easy Read guide</li> </ul>	<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	<p>Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the</p>	Yes	<ul style="list-style-type: none"> <li>Complaints process (summary available on <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a>)</li> </ul>	<p>Section 8.2.4 of the Complaints Policy states this and it is also repeated on the webpage and in the</p>

	escalation request being received.		<ul style="list-style-type: none"> <li>• Complaints Policy</li> <li>• Complaints Easy Read guide</li> </ul>	Easy Read guide.
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"> <li>• Complaints Policy</li> </ul>	Section 8.2.1 clarifies this within our Complaints Policy.
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"> <li>• Complaints Policy</li> </ul>	In 2023-24 we amended our complaints process so that all stage 1 complaints are investigated and responded to by the Head of Operations. Stage 2 complaints will then be responded to by our Chief Executive.
6.14	Landlords must issue a final response to the stage 2 <b><u>within 20 working days</u></b> of the complaint being acknowledged.	Yes	<ul style="list-style-type: none"> <li>• Complaints process (summary available on <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a>)</li> <li>• Complaints Policy</li> <li>• Complaints Easy Read guide</li> </ul>	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.  There were no Stage 2 complaints received in 2023-24.
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the	Yes	<ul style="list-style-type: none"> <li>• Complaints process (summary available on <a href="http://www.firstpriorityha.co.uk/complai">www.firstpriorityha.co.uk/complai</a>)</li> </ul>	Section 8.2.7 of the Complaints Policy details the 20 working day

	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.		<a href="#">nts-feedback</a> <ul style="list-style-type: none"> <li>Complaints Policy</li> </ul>	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"> <li>Complaints Policy</li> </ul>	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"> <li>Complaints Policy</li> </ul>	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"> <li>Complaints Policy</li> </ul>	Section 8.2.9 of the Complaints Policy quotes this section of the Housing Ombudsman Code.
6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language:	Yes	<ul style="list-style-type: none"> <li>Complaints Policy</li> <li>Complaint response templates</li> </ul>	Section 8.2.10 of the Complaints Policy refers to this.

	<p>a. the complaint stage;</p> <p>b. the complaint definition;</p> <p>c. the decision on the complaint;</p> <p>d. the reasons for any decisions made;</p> <p>e. the details of any remedy offered to put things right;</p> <p>f. details of any outstanding actions; and</p> <p>g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.</p>			All templates for complaint responses include Housing Ombudsman information as standard.
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"> <li>• Complaints Policy</li> <li>• Complaints process</li> </ul>	<p>Clarified within Section 8.2.4 of the Complaints Policy.</p> <p>Stage 2 complaints are now issued by the Chief Executive. Any investigations are done so in liaison with the relevant parties (e.g. managing agent/ contractors).</p>

### Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and	Yes	Complaints Policy The complaints webpage "putting	Section 7.2 of the Complaints Policy refers

	<p>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"> <li>• Apologising;</li> <li>• Acknowledging where things have gone wrong;</li> <li>• Providing an explanation, assistance or reasons;</li> <li>• Taking action if there has been delay;</li> <li>• Reconsidering or changing a decision;</li> <li>• Amending a record or adding a correction or addendum;</li> <li>• Providing a financial remedy;</li> <li>• Changing policies, procedures or practices.</li> </ul>		<p>things right” section  <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></p>	<p>to 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> <p>We also refer to the Right to Repair guidance on statutory compensation amounts for complaints relating to repairs.</p> <p>Our Board have also agreed to a discretionary payments policy to help guide staff where gesture of good will payments are to be used as a remedy.</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"> <li>• Complaints Policy</li> </ul>	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"> <li>• Complaints Policy</li> <li>• The complaints webpage “putting things right” section  <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></li> </ul>	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"> <li>• Complaints Policy</li> <li>• The complaints webpage “putting things right” section  <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></li> </ul>	<p>Section 7.3 of the Complaints Policy and also referenced in the “putting things right” section of the webpage.</p> <p>Guidance from the Housing Ombudsman is regularly monitored, with policies and practice reviewed where required.</p>

## 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> <p>a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements.</p> <p>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;</p> <p>c. any findings of non-compliance with this Code by the Ombudsman;</p> <p>d. the service improvements made as a result of the learning from complaints;</p> <p>e. any annual report about the landlord's performance from the Ombudsman; and</p> <p>f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.</p>	Yes	<ul style="list-style-type: none"> <li>• Complaints Policy</li> <li>• How we deal with complaints section of webpage: <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></li> </ul>	<p>The Complaints Policy, Section 14 outlines the process for reporting and monitoring of complaints handling. This includes publishing our annual complaints performance and service improvement report.</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>

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"> <li>Complaints Policy</li> <li>Performance section of the website, accessed via: <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></li> </ul>	Section 14.2 of the Complaints Policy outlines the approach to this.
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

## 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"> <li>• Complaints Policy</li> <li>• Performance section of the website, accessed via: <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></li> </ul>	<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>Learnings are also highlighted in each complaint response. These are then reported through the organisation at our monthly performance management meeting and then to our Board.</p> <p>This includes explaining these learning to our responsible Board Member for complaints at our bi-monthly meetings with</p>

				them.
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"> <li>Complaints Policy</li> <li>Performance section of the website, accessed via: <a href="http://www.firstpriorityha.co.uk/complaints-feedback">www.firstpriorityha.co.uk/complaints-feedback</a></li> </ul>	<p>Statement on webpage 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"> <li>Complaints Policy</li> </ul>	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"> <li>Complaints Policy</li> </ul>	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"> <li>Complaints Policy</li> </ul>	<p>The Chief Executive is the named member responsible for complaints (Section 6.5 of the Complaints Policy).</p> <p>We also have a named Board Member that leads</p>

				on complaints.
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"> <li>• Performance Reporting Framework</li> <li>• Annual service improvement reports</li> </ul>	<p>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.</p> <p>Our lead Board Member for complaints also receives this information at a bi-monthly meeting.</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <p>a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance;</p> <p>b. regular reviews of issues and trends arising from complaint handling;</p> <p>c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and</p> <p>d. annual complaints performance and service improvement report.</p>	Yes	<ul style="list-style-type: none"> <li>• Performance Reporting Framework</li> <li>• Annual service improvement reports</li> </ul>	See above.

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> <p>a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments;</p> <p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>	Yes	<ul style="list-style-type: none"> <li>• Consumer Standards</li> <li>• Monthly performance meetings</li> </ul>	<p>We provide assurance on this through our continued compliance with the Consumer Standards. This will extend to the Professional Competency Standard once this is fully developed.</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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