

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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	Brighton & Hove City Council complaints procedure has been updated to use this wording and it is included in our staff complaint handling training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	Section amended based on Housing Ombudsman Compliance feedback Brighton & Hove City Council complaints policy wording now to include: <i>Customers expressing dissatisfaction will be given the opportunity to make a complaint.</i> <i>Complaints made by a representative on behalf of a customer will be handled</i>

				<p><i>in line with this complaint policy</i></p> <p>A template paragraph has also been created and provided to all officers in Housing who respond to MP/Cllr Enquiries, asking whether the customer would like this to be a formal complaint.</p>
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Brighton & Hove City Council policy and staff training includes the distinction between a service request and a complaint.</p> <p>These are logged, reviewed and monitored.</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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback</p> <p>Brighton & Hove City Council complaints policy wording now to include:</p> <p><i>If a customer expresses dissatisfaction with the outcome of their service</i></p>

				<p><i>request, then a complaint will be raised.</i></p> <p><i>A complaint will not stop the efforts to address the service request but will be considered concurrently.</i></p>
1.6	<p>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.</p>	Yes		<p>Information about how to make a complaint will now be included in our proactive mail out to customers inviting them to complete a corporate satisfaction survey. This activity happens in February each year.</p>

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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in the Brighton & Hove City Council complaint procedure, Appendix B.
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. 	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback</p> <p>Policy wording amended to clarify that <i>"matters that have not affected the complainant personally or caused them an injustice"</i> applies only to the original complainant, not any third party representing them.</p>

	<ul style="list-style-type: none"> Matters that have previously been considered under 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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback</p> <p>Policy wording amended to clarify that</p> <p><i>Complaints should be made within 12 months of the customer becoming aware of the issue, unless there is good reason for them not to have done so, which will be considered on a case-by-case basis.</i></p>
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>This is included in Brighton & Hove City Council complaints procedure</p> <p>All complaints are carefully considered and will only be rejected if they fall under any of the categories at app B of the council's complaints procedure or if they are more than 12 months old.</p>

2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure	All complaints will be considered on a case-by-case basis. Instructions to provide full reasons for rejected complaints and signposting to the Ombudsman are included in the Brighton & Hove City Council complaints procedure.
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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	https://www.brighton-hove.gov.uk/council-and-democracy/feedback-about-council-services/how-make-complaint	Complaints can be made over the phone, by email, by online form, by post, via a third party or face to face to any member of landlord staff visiting their home or area.
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		This is included in staff complaint handling training and in the Customer Experience Induction Briefing which all new starters to the council are encouraged to attend.
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		Brighton & Hove City Council performance management framework does not target volumes of complaint or upheld rates (unlike for example, response times which are targeted), in order not to

				inadvertently create avoidance of accepting complaints. Volumes are monitored however as they can be indicative of emerging issues.
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	How to make a complaint	The council's full complaints procedure is published on our website with brief, simplified descriptions of how we operate our corporate and statutory complaints procedures.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in the complaint procedure
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in the complaint procedure
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		This is included in complaint correspondence at the appropriate points. We also publish this information in Homing In newsletter – sent electronically or hard copy

				to each tenant and leaseholder every quarter. Exploring other options such as inclusion in rent statements/gas safety check letters.
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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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	The Customer Feedback team. The complaints procedure has been updated to include that officers within the Customer Feedback Team fulfil the role of "complaints officer".
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		This is covered in training. Additionally, complaints are of a high priority for the administration and leadership team of the council. We would not usually experience any barriers to resolving complaints.
4.3	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	Yes		Dedicated complaint resource is set aside in the highest complaint volume areas. Complaints are a very high priority for the administration and leadership team of the

	core service and must be resourced to handle complaints effectively			council and are discussed at quarterly performance sessions. In house training is provided and run quarterly it is available for all council staff who respond to complaints. The Customer Feedback team also offer tailored training to teams with high volumes of complaints
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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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	Brighton & Hove City Council complaint policy covers all complaints.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<i>Section amended based on Housing Ombudsman Compliance feedback</i> <i>Policy wording amended to the below to clarify that there is no additional stage between service request and formal complaint.</i>

				<p>6. The early and local resolution of issues</p> <p><i>The council's aim is to resolve all issues as quickly as possible and as near as possible to the point of service delivery. It is the responsibility of whichever member of staff, in any council service team, that an issue initially raised with, to try to resolve the issue there and then wherever possible, however the customer should always also be given the option to raise a complaint at every opportunity.</i></p> <p><i>A complaint will not stop the efforts to address the service request but will be considered concurrently. If a customer expresses dissatisfaction with the outcome of their service request, then a complaint will be raised.</i></p>
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure	We do not have an additional stage between service request and

	complaint process unduly long and delay access to the Ombudsman.			complaint and the complaint process has only two internal stages.
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		Regular high volume contractors handle Stage 1 complaints, then escalation to Stage 2 is as per any other complaint, so there are no additional stages.
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes		Complaint handling clause is included in relevant contracts and regular contractors attend complaint handling training
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback. policy wording now to include. Under the stage 2 part of section 7</p> <p><i>- If there are valid reasons why the complaint cannot be taken forward (see Appendix B on exclusions) this will be explained"</i></p> <p>Other requirements of this section are covered in the</p>

				complaint policy, template letters and training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback. Policy wording now to include: Under the stage 2 part of section 7</p> <p><i>- If there are valid reasons why the complaint cannot be taken forward (see Appendix B on exclusions) this will be explained"</i></p> <p>Other requirements of this section are covered in the complaint policy, template letters and training.</p>
5.8	At each stage of the complaints process, complaint handlers must: <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; 	Yes		<p>Brighton & Hove City Council inhouse complaint handling training focusses on how to conduct an impartial and meaningful investigation. Our training is provided by experienced Customer Feedback Managers from</p>

	<p>c. take measures to address any actual or perceived conflict of interest; and</p> <p>d. consider all relevant information and evidence carefully.</p>			<p>the team with occasional additional best practice training brought in, for example from the Ombudsman. Customer Feedback staff are encouraged to develop their skills via the Ombudsman's regular updates, press releases and special reports. This is then passed on to service managers.</p>
5.9	<p>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.</p>	Yes	<p>Brighton & Hove City Council Corporate Complaints Policy and Procedure</p>	<p>Section amended based on Housing Ombudsman Compliance feedback At Stage 1</p> <p><i>"in exceptions, if it is not possible to fully reply within 10 working days the customer must be contacted by the responding officer, apologising, explaining why there is a delay and giving a clear timeframe for when the response will be received and will agree with the resident, suitable intervals for being updated on their complaint, when the response falls outside of the extended timescales"</i></p>

				<p><i>set out in this policy".</i></p> <p>At stage 2</p> <p><i>"in exceptions, if it is not possible to fully reply within 20 working days the customer must be contacted by the responding officer, apologising, explaining why there is a delay and giving a clear timeframe for when the response will be received and will agree with the resident, suitable intervals for being updated on their complaint, when the response falls outside of the extended timescales set out in this policy".</i></p>
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		Yes, this is in line with the council's equalities policy and working practices across departments.
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	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure	Brighton & Hove City Council's complaint policy details at Appendix B the

	clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.			reasons that complaints may not be investigated and these are the same at Stage 2.
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		This is all captured in the complaint case management database.
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	https://www.brighton-hove.gov.uk/council-and-democracy/putting-things-right-guidance-remedying-faults-service-delivery-and-complaint-handling	This is included in staff training and guidance is provided to all staff on identifying an appropriate remedy at any stage.
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	https://www.brighton-hove.gov.uk/council-and-democracy/how-we-deliver-customer-services/managing-unreasonable-customer-behaviour-policy	This is referenced in Brighton & Hove City Council complaints procedure and outlined more fully in the wider policy.
5.15	Any restrictions placed on contact due to unacceptable behaviour must be	Yes	https://www.brighton-hove.gov.uk/council-and-	This is referenced in Brighton & Hove City

	proportionate and demonstrate regard for the provisions of the Equality Act 2010.		democracy/how-we-deliver-customer-services/managing-unreasonable-customer-behaviour-policy	Council complaints procedure and outlined more fully in the wider policy.
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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		This is included in Brighton & Hove City Council complaints handling training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in Brighton & Hove City Council complaint procedure. This is included in Brighton & Hove City Council complaints handling training.
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in Brighton & Hove City Council complaint procedure. This is included in Brighton & Hove City Council

				complaints handling training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	Section amended based on Housing Ombudsman Compliance feedback Policy wording updated to clarify that further extensions are in working days <i>"this should not exceed a further 10 working days without good reason"</i> .
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		This is included in Brighton & Hove City Council complaints handling training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	Section amended based on Housing Ombudsman Compliance feedback. Policy wording now to Include: <i>"...explaining why there is a delay and giving a clear timeframe for when the response will be received. This should not exceed a further 10 working days without good</i>

				<i>reason. In this communication the customer will also be advised of their right to contact the Ombudsman".</i>
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		This is included in Brighton & Hove City Council complaints handling training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	Section amended based on Housing Ombudsman Compliance feedback. Policy wording now to Include under section 7: <i>If related additional complaints are made before the Stage 1 response is issued, and it would not unreasonably delay the response, then a response to the related complaints will be incorporated into that Stage 1 response. If the additional complaints are not related, or would cause an unreasonable delay to the existing complaint being responded to, then a new Stage 1 will be logged.</i>

				<p>Policy wording at Appendix B will be amended to say:</p> <p><i>"matters already dealt with through appropriate complaint or appeal procedure and where that process has been exhausted - these matters will only be considered again as a new stage 1 complaint if new relevant evidence comes to light which may change the previous outcome"</i></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> <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 stage 2 if the individual is not satisfied with the response. 	Yes		<p>Brighton & Hove City Council templates, internal guidance and staff training have been updated to reflect the full requirements.</p>

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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in the Brighton & Hove City Council complaint procedure and complaint handling training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in the Brighton & Hove City Council complaint procedure and complaint handling training
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in the BHCC complaint procedure and complaint handling training.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes		In all cases where the customer is dissatisfied with the stage 1 complaint and requests escalation to stage 2, the complaint is escalated for review by a Customer Feedback Manager. The Customer

				Feedback Managers are independent of service areas who respond to Stage 1s.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback. Policy wording now to include</p> <p><i>"stage 2 complaints should be responded to within 20 working days of the complaint being acknowledged"</i></p> <p>This is set out in the Brighton & Hove City Council complaint procedure and complaint handling training.</p>
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback. Policy wording now to include:</p> <p><i>"this should not exceed a further 20 working days without good reason".</i></p>

				This is set out in the Brighton & Hove City Council complaint procedure and complaint handling training.
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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback. Policy wording now to include: <i>"...explaining why there is a delay and giving a clear timeframe for when the response will be received. This should not exceed a further 20 working days without good reason. In this communication the customer will also be advised of their right to contact the Ombudsman".</i></p> <p>This is set out in the Brighton & Hove City Council complaint procedure and complaint handling training.</p>

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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	<p>Section amended based on Housing Ombudsman Compliance feedback. Policy wording now to include: <i>A complaint response should be provided when the answer is known, not when outstanding actions to address the complaint are completed.</i></p> <p><i>Required actions must be monitored and the customer kept updated of progress.</i></p> <p>This is set out in the Brighton & Hove City Council complaint procedure and complaint handling training.</p>
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		Brighton & Hove City Council complaint handling training explains the need to check and refer to all relevant policy, procedure and legislation when investigating and responding to complaints.

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: 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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in the Brighton & Hove City Council complaint procedure and complaint handling training.
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes		Brighton & Hove City Council Customer Feedback Managers work closely with services to ensure that responses are factually accurate and that the service agree to all recommendations, remedy and/or service improvement

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
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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	https://www.brighton-hove.gov.uk/council-and-democracy/putting-things-right-guidance-remedying-faults-service-delivery-and-complaint-handling	This is included in staff training and guidance is provided to all staff on identifying an appropriate remedy at any stage.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	https://www.brighton-hove.gov.uk/council-and-democracy/putting-things-right-guidance-remedying-faults-service-delivery-and-complaint-handling	Included in the guidance on remedies.
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		Any actions or service improvements identified through the complaint process are logged and reported up through

				departmental management teams for monitoring to conclusion.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	https://www.brighton-hove.gov.uk/council-and-democracy/putting-things-right-guidance-remedying-faults-service-delivery-and-complaint-handling	Our remedy guidance has been created based on the guidance from both the Housing Ombudsman Service and the Local Government and Social Care Ombudsman.

Section 8: Self-assessment, reporting and compliance

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 performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	<p>https://www.brighton-hove.gov.uk/council-and-democracy/feedback-about-council-services/annual-complaints-and-service-improvement-report-housing-management-service</p>	The published report meets the requirements of this section

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	https://www.brighton-hove.gov.uk/council-and-democracy/feedback-about-council-services/annual-complaints-and-service-improvement-report-housing-management-service	The report and governing body's response covers this requirement.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes		We will do this as the need arises.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes		We will do this as requested
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		We commit to doing this if an incident arises.

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	Brighton & Hove City Council Corporate Complaints Policy and Procedure	This is set out in section 4 of the policy and is included in complaint handling training
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		Reporting on trends and issues is provided regularly to senior managers in services to support introduction of positive changes to service delivery
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		Reporting on actions, learnings and service improvements are provided back to services on a quarterly basis and included in quarterly briefings to members.
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		Head of Tenancy Services performs this role and is also the SRO for the complaint handling review project designed to further improve complaint handling processes.

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		Yes, the Cabinet member for Housing.
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		MRC receives quarterly briefings and has full access to suitable staff to provide any further information that they require.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: 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	Yes		MRC receives quarterly briefings to include the listed matters and the Corporate Director is copied to all Ombudsman decisions and discussed key decisions with the relevant lead councillor.

	d. annual complaints performance and service improvement report.			
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		<p>This is contained within the complaint handling training and reiterated at all forums where complaints are discussed, including at senior decision-making level. A project is underway to review complaint handling processes to further improve these aspects of complaint handling.</p>

