

## 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	P&P Ref	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>	<b>Yes</b>	Required text is contained within the current Policy and Procedure	1.2	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
1.3	<p>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.</p> <p>A complaint that is submitted via a third party or representative must be handled in line with the landlord's complaints policy.</p>	No	Paragraph 2 on p 1 of the existing policy needs to be amplified by the addition of these two sentences (taking account of clients	1.3 & 1.8	P&P updated to amplify these points in P&P ref 1.3 and 1.8
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	<p>This is covered in the sixth paragraph on p1 of the existing policy. However, it would be more logically positioned as the third paragraph</p> <p>How do we monitor service requests</p>	1.4  1.5	<p>Policy updated and text moved to P&amp;P ref 1.4.</p> <p>Policy updated to add mention to how we monitor service requests in P&amp;P ref 1.5.</p>

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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.	No	The current statement (the last sentence of the sixth paragraph on p1 is inadequate as it states that the client or tenant has the right to make a complaint if they are dissatisfied with the response to the service request. However, the code says that it MUST be treated as a complaint. The final sentence should be amended to read “A complaint must be raised when a tenant or client expresses dissatisfaction with the response to the service request (even if the handling of the request is ongoing). We also then need to address the question of how this is tracked and implemented.	1.4	P&P updated (P&P ref 1.4) to reflect additional wording.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can	Yes	Covered in the 2 <sup>nd</sup> paragraph on p 2 of the existing policy	1.9	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.				

## Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	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	Covered in the second paragraph on p2 of the existing policy	1.12	
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	Yes	Covered in the second paragraph of p2 of the existing policy	1.11 & 1.12	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	<p>reasonable to residents. Acceptable exclusions include:</p> <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>				
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	<b>Yes</b>	Covered in the third paragraph of p2 of the existing policy	1.11 & 1.12	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	discretion to accept complaints made outside this time limit where there are good reasons to do so.				
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	Covered in the second paragraph of p2 of the existing policy	1.11 & 1.12	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Covered in the second paragraph of p2 of the existing policy. However further amplification is required. Suggest that the first line of the third paragraph on p2 is reworded as follows:	1.10 & 1.11	Additional text added to 1.11

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
			'Examples of reasons why a complaint may be refused are listed below. However, the individual circumstances of each complaint will be considered.		

### Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	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.	<b>Yes</b>	Covered in 'Reasonable Adjustments' section of the existing Policy.	2	
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff	<b>Yes</b>	'How to make a complaint' section covers this and states that a complaint can be made to any member of staff.	3.1	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.				
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.	<b>Yes</b>	BHT Sussex acknowledge this view.		No need for this to be specifically referenced within our Policy.
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.	<b>Unclear</b>  <b>Yes</b>	The 'Reasonable adjustments' section of current Policy. Needs to state what the accessible formats are by which the policy is made available  Covered in the 'How to make a complaint section'	2.4  3	P&P updated to make it more clear which additional formats the policy will be available in. A simplified version of the P&P is also being developed.



<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>P&amp;P Ref</b>	<b>Commentary / explanation</b>
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	<b>Yes</b>	Covered on page 3, paragraph 3 of the existing Policy.	1.11 & 1.15	.
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.	<b>Yes</b>	Covered on page 1, paragraph 7	1.8	
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.	<b>Partially</b>	Partially covered in the final paragraph of p2 of the existing policy but we need to add the details of HOW to complain to the Ombudsman	1.11, 1.15 & 6.4	Additional wording added to P&P ref 1.11, 1.15 & 6.4 to outline how to complain to the Ombudsman

#### Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	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	Covered on page 4, paragraph 1 of the existing Policy.	1.10, 3.13 & 3.21	Consideration was given to adding manager details to the policy but given number of managers across projects this was not realistic. Current wording is sufficient.
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 currently the case. Complaints Officers are usually the service manager with access to staff at all levels within their service.	1.10	
4.3	Landlords are expected to prioritise complaint	Yes		1.1	Text added to P&P ref 1.1, adding additional context to

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a core service and must be resourced to handle complaints effectively				training for managers with responsibility for complaints and section on the weekly update to staff

## Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	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	There is one BHT Sussex Policy to cover all services.		
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not	Yes	Early resolution of complaints is referenced in the first paragraph on p2 within existing Policy.	1.10	

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>P&amp;P Ref</b>	<b>Commentary / explanation</b>
	appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.		BHT Sussex do not have and 'informal complaints' or 'stage 0'.		
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.	<b>Yes</b>	Our two stage process is referenced within the existing Policy.	3	
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.	<b>Yes</b>	This is referenced on the final paragraph of page 1 of the existing policy	1.6	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	No	The question here is how do we ensure that any contractors handle complaints in line with the Code?	1.6	Additional text added to P&P ref 1.6 on page 1 to state that we will work with a contractor or third party if a complaint is received directly by them to ensure their response is in line with our P&P.
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes*	This is covered in the 6 <sup>th</sup> paragraph under ‘Stage One’ but it would be more logical to move it to become the third paragraph under ‘Stage One’. The Procedure should refer to the need to use the standard complaint template (with the template attached as an Appendix). How do we know that this happens?	3.6	Stage 1 and stage 2 sections of the policy have been reformatted. ‘Clarification and responsibility’ section added to make this area much clearer.
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*	It is stated in the 7 <sup>th</sup> paragraph under ‘Stage One’ but would be better placed if transferred to become the fourth paragraph of this section.	3.6	Stage 1 and stage 2 sections of the policy have been reformatted. ‘Clarification and responsibility’ section added to make this area much clearer.

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
5.8	At each stage of the complaints process, complaint handlers must: a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully.	Yes	Reflected in the eighth paragraph under 'Stage One'.	3.8 & 3.10	
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	This is covered in the fourth paragraph under 'Stage One in the existing policy	3.5	

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>P&amp;P Ref</b>	<b>Commentary / explanation</b>
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.	<b>No</b>	<p>Reasonable adjustments are referred to on page 3 of the existing Policy but perhaps giving some examples should be considered and cited.</p> <p>Need to add 'The complaint handler must keep a record of any reasonable adjustments agreed (and keep them under review) and a record of any disabilities disclosed by the tenant/client.</p>	2	<p>Additional text added to state that the complaint handler must keep a record of any reasonable adjustments agreed.</p> <p>Note: a Column has been added to the quarterly complaints log to track this.</p>
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	<b>Yes</b>	This is covered in the final paragraph (p4 of Stage One' Complaint handlers are made aware of how to escalate their complaint to the next stage if they remain dissatisfied with the response to the current stage.	3.13	Stage 1 and stage 2 sections of the policy have been reformatted. 'Satisfaction and escalation' section added to make this area much clearer.
5.12	A full record must be kept of the complaint, and the outcomes at each stage.	<b>Yes</b>	Full records of all complaints are kept and administered in our complaints log and these		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.		are reported quarterly to OPC and the Board.	6	
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	Complaint handlers will look to resolve complaints at the earliest possible stage to the tenant's satisfaction. Covered in the third paragraph under 'Stage One'	3.5	
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	Yes	A separate ASB Policy is in place. Also covered in 'Excessive Complaints' on p5 of the existing policy	4	



Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	putting any restrictions in place and must keep restrictions under regular review.				
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	Existing Policy sets out clearly when we will restrict contact in cases of excessive complaints (p5). When dealing with ASB cases we routinely take in to account the Equality Act 2010 and its implications on the complainant and the perpetrator.	4	

## Section 6: Complaints Stages

### Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	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	Yes*	Complaint handlers will routinely carry out an investigation following a complaint and make a judgement on whether a quick resolution can be reached or if further investigation is required.	3.5	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.		In exceptional circumstances where the complainant may be at high risk, processes are in place to link with partner agencies and where appropriate carry out a multi-agency risk assessment.  This needs to be included in the text for 'Stage One'		
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	Covered in the second paragraph under 'Stage One'	3.4	Stage 1 and stage 2 sections of the policy have been reformatted. 'Acknowledgement' section added to make this area much clearer
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	Covered in the third Paragraph under 'Stage One'	3.5	Stage 1 and stage 2 sections of the policy have been reformatted. 'Resolution and response' section added to make this area much clearer
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then	Yes	Covered in the fourth paragraph under 'Stage One'	3.5	Stage 1 and stage 2 sections of the policy have been reformatted. 'Resolution and response' section added to make this area much clearer

<b>Code provision</b>	<b>Code requirement</b>	<b>Comply: Yes / No</b>	<b>Evidence</b>	<b>P&amp;P Ref</b>	<b>Commentary / explanation</b>
	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.				
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.	<b>Yes</b>	Covered in the fourth paragraph under 'Stage One'	3.5	Stage 1 and stage 2 sections of the policy have been reformatted. Resolution and response' section added to make this area much clearer.
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	<b>Yes</b>	Covered in the ninth paragraph under 'Stage One of the existing policy.	3.9	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	provided to the resident.				
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	Covered in the ninth paragraph under 'Stage One of the existing policy.	3.9	Stage 1 and stage 2 sections of the policy have been reformatted. 'Comprehensive response' section added to make this area much clearer
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		3.10	Stage 1 section of the policy have been reformatted. Text added to 'Comprehensive response' section to make this area much clearer.

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 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 stage 2 if the individual is not satisfied with the response.	Yes	Items a-g are all covered in standard stage 1 complaint template.	3	Template letter will not be published with the Policy but will go through with complaint handlers at OMT and annually refreshed

## **Stage 2**

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's	Yes	As outlined in the first paragraph of 'Stage 2'		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.			3.15	
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.	<b>Yes</b>	Covered in the third paragraph of the existing policy	3.17	
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.	<b>Yes* /Partial</b>	Covered in the 'acknowledgement' paragraph under 'Stage Two'. The stage 2 complaint handler will request a detailed case summary from the stage 1 complaint handler and detail of action taken to date. The above text needs to be added to the existing policyA	3.17	Additional text added to the 'acknowledgement' paragraph in stage 2.
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	<b>Yes</b>	Covered in the second paragraph under 'Stage Two' of the existing Policy.	3.16	Stage 2 section reformatted. This is now covered in 'complaint handler' paragraph

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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.	<b>Yes</b>	Covered in the fifth paragraph under Stage Two of the existing policy	3.18	
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.	<b>Yes</b>	Covered in the sixth paragraph under 'Stage Two' of the existing policy	3.18	
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.	<b>Yes</b>	Covered in the sixth paragraph under 'Stage Two' of the existing policy	3.18	
6.17	A complaint response must be provided to the	<b>Partial</b>	Covered in the seventh paragraph under 'Stage 2' of		Stage 2 section now reformatted. This is now

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.		the existing policy but need to add that outstanding actions will be tracked and actioned promptly and the complainant kept informed of progress	3.18	covered in 'final response' paragraph.
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.	<b>Yes</b>	Covered in the penultimate paragraph of 'Stage Two'	3.19	
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;	<b>Yes /Partial</b>	The policy/procedures need to refer to the existence of the Stage Two response template	3.18	Additional text added to the final response paragraph of the stage 2 section



Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.				
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	<b>No</b>	The current policy document doesn't say this (about involving all relevant staff in a final response). Suggest that the second paragraph under 'Stage Two' is amplified to reflect this.	3.18	Additional text added to final response paragraph of stage 2 section

## Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this	<b>Yes, but not articulated</b>	We are an organisation that seeks to learn from any mistakes made and will		Additional 'acknowledging when things go wrong

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	<p>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"> <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>always seek to be open and transparent in our responses. This point needs to be covered in the Stage Two policy and the stage two template.</p>	3.20	paragraph' added to stage 2 section
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Complaint handlers will ensure that remedies reflect the nature of the complaint.	3.19	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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.	<b>Yes but not articulated in policy</b>	The remedies offered are proportionate to the issue and carried out in agreement with the complainant.	3.19	<i>'The response will clearly set out what will happen and by when, in agreement with the complainant where appropriate'</i> has been added to P&P ref 3.19
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	<b>Yes but not articulated</b>	As in 7.1 account is taken of the ombudsman's guidance and the complaint handling code 2024.	3.21	

## Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
8.1	Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include: a. the annual self-assessment against this Code to ensure their complaint handling policy	<b>Yes</b>	The first annual complaints performance and service improvement report was presented to the Board in December 2024. Henceforth (as from June 2025) it will be reported to the June meeting of the Board	6	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	<p>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>				

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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.	<b>Yes</b>	As above, an annual complaints performance and service improvement report was developed and reported to the December 2024 board meeting. This was published on our web site, together with the Board's response. As from June 2025, this will be done every June	6	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	<b>Yes</b>	We assess our current Policy against the updated Complaint Handling code on an annual basis.	6	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	<b>Yes</b>	Exemplified by the communication between the ombudsman and the chief executive in 2024		
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,	<b>Yes</b>	Whilst we acknowledge that there have been no working examples of this, we commit to fulfilling these obligations should such circumstances present themselves.		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.				

### Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	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.	<b>Yes</b>	We are a learning organisation and will seek to improve our service delivery based on the findings of any complaints that we receive.	6	
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	<b>Yes</b>	We continue to drive a positive complaint handling culture at all levels throughout the organisation. The quarterly reports to OPC and the Board analyse numbers of complaints lodged, upheld and rejected	6	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	identify issues and introduce positive changes in service delivery.		and the nature of the complaints. Where changes to service delivery are identified these will be identified as will potential systemic changes. We need to identify how these will be monitored??		
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.	<b>Yes</b>	Our tenants have the opportunity to feedback and challenge BHT Sussex on any issues that they have at the Tenant Scrutiny Panel. Within the organisation, staff are encouraged to raise issues that may be a block to effective service delivery. The quarterly reports to OPC and the Board are shared with the Tenants Scrutiny panel	6	We will share our annual complaints performance and service improvement report with the Tenant Scrutiny Panel.
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	<b>Yes</b>	The chief executive is nominated lead officer with overall responsibility for complaints.		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	and procedures that require revision.				
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	A member of the board was appointed in March 2024		MRC appointed at Board meeting in March 2024.
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		6	
9.7	As a minimum, the MRC and the governing body	Yes	Summary report on complaint reported to OPC and the	6	



Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	(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 d. annual complaints performance and service improvement report.		board on a quarterly and annual basis. The MRC sees the report in draft and challenges or seeks further information to be included. The MRC samples a small number of complaints on a quarterly basis to check how they are handled.		
9.8	Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:	<b>Yes</b>	BHT Sussex encourage complaints from our tenants where appropriate. Our processes are geared towards resolving complaints at the earliest opportunity.		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.				