

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>	Yes	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	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	Contained within sections 1.3 and 1.8	1.3 & 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	Referenced section 1.4 and 1.5	1.4 1.5	It recognised that the policy notes the difference between a service request and complaint. However, we must ensure that complaint handlers and those working in front line services know the difference

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.	Yes	Noted within section 1.4	1.4	BHT Sussex should put extra focus on ensuring that frontline staff are aware that a complaint MUST be raised when a tenant expresses dissatisfaction with the response to a service request.
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.	Yes	Covered in the 2 nd paragraph on p 2 of the existing policy	1.9	

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 reasonable to residents. Acceptable exclusions include: • 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	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
	Claim Form and Particulars of Claim, having been filed at court. 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	Covered in the third paragraph of p2 of the existing policy	1.11 & 1.12	There has been one example of this (is this complaint no. 55 on the 2025/26 spreadsheet relating to Baird House)
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	Yes	Covered in the second paragraph of p2 of the existing policy	1.11, 1.12, 1.13	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.			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 1.11	1.10 & 1.11	

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.	Yes	Covered in 'Reasonable Adjustments' section of the existing Policy.	2.1 – 2.4	
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	'How to make a complaint' section covers this and states that a complaint can be made to any member of staff.	3.1	Complaints are coming in via numerous sources (staff and residents) which demonstrates a good understanding of the complaints P&P across the board. Managers need to continue to ensure staff are sufficiently trained in understanding the Complaint P&P
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of	Yes	BHT Sussex acknowledges this view.		There is no need for this to be specifically referenced within our Policy.

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.				
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	P&P updated to make it more clear which additional formats the policy will be available in. Covered in the 'How to make a complaint section'	2.4 3	A simplified version of the P&P is now available on our website: Complaints Policy & Procedure - BHT Sussex with the full P&P available if required A further simplified (downloadable & printable) version is being finalised.
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	Covered in section 1.11 & 1.15	1.11 & 1.15	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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	Covered in section 1.8	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.	Yes	Additional wording added to P&P ref 1.11, 3.13, 3.21 & 8.1 to outline how to complain to the Ombudsman	1.11 & 8.1	Details for how to contact the Ombudsman form part of the template stage 1 and stage 2 response letters. These are available on: Complaints - The Toolbox Intranet

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	Yes	Covered on page 4, paragraph 1 of the existing Policy.	1.10	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.

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.				
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 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	Yes		1.1	Manager to continue to ensure their staff are adequately trained on the complaints P&P including an annual refresh. Recommendation: training on complaints P&P to be introduced as part of induction program.

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 appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Early resolution of complaints is referenced in the first paragraph on p2 within existing Policy. BHT Sussex do not have and 'informal complaints' or 'stage 0'.	1.10	
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	Our two stage process is referenced within the existing Policy.	3	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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	This is referenced in section 1.6	1.6	An example of this has occurred this year (this relates to complaint no's 18, 35 & 47 on the spreadsheet)
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Mentioned within 1.6	1.6	Message to be reinforced at quarterly contractor meetings that complaints must be handled in line with this code. We will also consider a future action to carry out scrutiny of a sample of complaints received by contractors to check on compliance
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	Yes	Stage 1 and stage 2 sections of the policy have been reformatted. 'Clarification and responsibility' section added to make this area much clearer.	3.7 (previously 3.6 in 2025)	The MRC will continue to do random checks to ensure that the template complaint response letters are being used.

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.				
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	Contained within 3.7 (previously 3.6 in 2025) for stage 1 & 3.22 (previously 3.19 in 2025) for stage 2	3.7 (previously 3.6 in 2025) & 3.22 (previously 3.19 in 2025)	A repeat of the wording within 3.6 has been added to the stage 2 section at point 3.19 of the revised 2026 P&P.
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	Yes	Reflected in section 3.9 (previously 3.8 in 2025) for stage one, 3.20 for stage 2 & 3.11 (previously 3.10 in 2025).	3.9 (previously 3.8 in 2025) & 3.11 (previously 3.10 in 2025)	An equivalent of 3.9 (previously 3.8 in 2025) has been added to the stage 2 section at point 3.20 of the revised 2026 P&P.

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	perceived conflict of interest; and d. consider all relevant information and evidence carefully.				
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 section 3.6 (previously 3.5 in 2025)	3.6 (previously 3.5 in 2025)	
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	Additional text added to state that the complaint handler must keep a record of any reasonable adjustments agreed. Note: a Column has been added to the quarterly complaints log to track this.	2	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	This is covered in the final paragraph 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.	3.14 (previously 3.13 in 2025) & 3.24 (previously 3.21 in 2025)	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. 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	From 2026 an organisation wide procedure is in place for keeping records of all individual complaints. A summary complaints log is scrutinised and reported on quarterly to OPC and the Board.	6	
5.13	Landlords must have processes in place to ensure a complaint can	Yes	Complaint handlers will look to resolve complaints at the earliest possible stage to the		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.		tenant's satisfaction. Covered in the third paragraph under 'Stage One'	3.6 (previously 3.5 in 2025)	
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	A separate ASB Policy is in place. Also covered in 'Excessive Complaints' in section 4 of the policy	4	
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 in section 4. When dealing with ASB cases we routinely take in to account the Equality Act 2010 and its implications on the	4	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
			complainant and the perpetrator.		

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 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	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	A section has been added in section 1 at 3.5 to note that 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

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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	Covered in section 3.4	3.4	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Covered in section 3.6 (previously 3.5 in 2025)	3.6 (previously 3.5 in 2025)	
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	Covered in section 3.6 (previously 3.5 in 2025)	3.6 (previously 3.5 in 2025)	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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	Covered in section 3.6 (previously 3.5 in 2025)	3.6 (previously 3.5 in 2025)	
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	Covered in section 3.10 (previously 3.9 in 2025)	3.10 (previously 3.9 in 2025)	
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	Yes	Covered in section 3.10 (previously 3.9 in 2025)	3.10 (previously 3.9 in 2025)	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	practice where appropriate.				
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	Covered in section 3.11 (previously 3.10 in 2025)	3.11 (previously 3.10 in 2025)	
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;	Yes	Items a-g are all covered in section 3.22 (previously 3.19 in 2025) and in the standard complaint template response letter	3.22 (previously 3.19 in 2025)	Template complaint letters (stage 1 & stage 2) are accessible to all staff alongside this P&P on The Toolbox: Complaints - The Toolbox Intranet

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

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 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	As outlined in section 3.16 (previously 3.15 in 2025)	3.16 (previously 3.15 in 2025)	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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	Covered in section 3.18 (previously 3.17 in 2025)	3.18 (previously 3.17 in 2025)	
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	Additional text added to the 'acknowledgement' paragraph in stage 2.	3.18 (previously 3.17 in 2025)	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Covered in section 3.17 (previously 3.16 in 2025)	3.17 (previously 3.16 in 2025)	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Covered in section 3.22 (previously 3.18 in 2025)	3.22 (previously 3.18 in 2025)	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
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	Covered in 3.22 (previously 3.18 in 2025)	3.22 (previously 3.18 in 2025)	
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	Covered in section 3.22 (previously 3.18 in 2025)	3.22 (previously 3.18 in 2025)	
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	Yes	Stage 2 section now reformatted. This is now covered in 'final response' paragraph	3.22 (previously 3.18 in 2025)	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.				
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	Covered in section 3.22 (previously 3.19 in 2025)	3.22 (previously 3.19 in 2025)	
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;	Yes	Updated text added to section 3.22 (previously 3.19 in 2025)	3.22 (previously 3.19 in 2025)	There is a standard template for a Stage 2 response Complaints - The Toolbox Intranet

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.	Yes	Contained within section 3.21 (previously 3.18 in 2025)	3.21(previously 3.18 in 2025)	

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 and set out the actions it has already taken, or intends to take, to put	Yes	Covered in section 3.23 (previously 3.20 in 2025)		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	things right. These can include: • 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.			3.23 (previously 3.20 in 2025)	
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.	3.22 (previously 3.19 in 2025)	
7.3	The remedy offer must clearly set out what will happen and by when, in	Yes	Contained with sections 3.22 and 3.23 (previously 3.19 & 3.20 in 2025)		

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.			3.22& 3.23 (previously 3.19 &3.20 in 2025)	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	As in 7.1 account is taken of the ombudsman's guidance and the complaint handling code 2024.	3.22 (previously 3.19 in 2025)	A reference to the Housing Ombudsman's compensation policy has been included within section 3.22 (previously 3.19 in 2025).

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 remains in line with its requirements.	Yes	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
	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.				

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.	Yes	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.	Yes	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.	Yes	Example 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,	Yes	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.	Yes	We are a learning organisation and will seek to improve our service delivery based on the findings of any complaints that we receive. We now include, on our summary spreadsheet of complaints, columns on any organisational and service level learning from each complaint. This is reviewed each quarter.	6	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve	Yes	We continue to drive a positive complaint handling culture at all levels throughout the organisation.	6	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.		The quarterly reports to OPC and the annual report to the Board analyse numbers of complaints lodged, upheld and rejected and the nature of the complaints. Where changes to service delivery are identified these will be identified as will potential systemic changes. We now include columns on organisational and service level learning each quarter.		
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	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. We share our annual complaints performance and service improvement report with the Tenant Scrutiny Panel. The quarterly reports to OPC and the annual report to the	6	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
			Board are shared with the Tenants Scrutiny panel. A member of the Tenant Scrutiny Panel is invited to participate in the annual self - assessment of BHT Sussex Policies and Procedures against the Ombudsman's Complaint Handling Code.		This has proved to be a very helpful and effective contribution.
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	The chief executive is nominated lead officer with overall responsibility for complaints.		
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	Yes	A member of the board was appointed in March 2024		MRC appointed at Board meeting in March 2024.

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	person is referred to as the Member Responsible for Complaints ('the MRC').				
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 (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;	Yes	Summary report on complaint reported to OPC and the 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.	6	

Code provision	Code requirement	Comply: Yes / No	Evidence	P&P Ref	Commentary / explanation
	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.				
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: 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,	Yes	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
	rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.				