

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 2025
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	This complaint definition is included in Citizen's complaints policy. The definition has been shared within a complaints e-learning module for all staff, complaint handler training and customer experience advisor training	Our complaint policy reflects this definition verbatim. Our suite of training includes practical examples to reinforce this (e-learning module for all staff, complaint handler training, CEX advisor 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	Included in complaints policy, complaints E-learning module for all staff, complaint handler training, customer experience advisor training	Frontline colleagues are trained to recognise expressions of dissatisfaction regardless of words and/or language used. We accept complaints via MPs, councillors, advocates, and legal reps. We sample check customer calls and assess if complaints are logged when dissatisfaction is expressed.
1.4	Landlords must recognise the difference between a service request and a complaint. This	Yes	This is included in Citizen's complaints policy, a	Training with customer experience advisors has been completed in 2024/ 25 which

	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.		complaints e-learning module for all staff, complaint handler training, customer experience advisor training. Service requests are captured within Active H (CRM) and are monitored to completion.	compliments feedback advisors receive from management following call monitoring quality assessments.
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	All staff have completed an e-learning module on complaints.	
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	Yes	Details of how to make a complaint are included within our Tenant Satisfaction Measures survey to customers and ad hoc surveys sent to engaged customers.	Details of how to make a complaint are not included within our transactional surveys as these are sent mainly by SMS and are designed to be easy to read and quick to respond to.

	must provide details of how residents can complain.			
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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	<p>Valid reasons for not including a complaint are specified in our complaints policy and trained out to complaint handlers.</p> <p>Letters are sent to customers to inform them of the reason for not accepting their complaint.</p>	<p>797 complaints raised in 2024-25 were cancelled where they were not deemed a complaint.</p> <p>My account and website form contacts submitted as complaints are assessed before formally logging.</p>
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. 	Yes	<p>Valid reasons for not including a complaint are specified in our complaints policy.</p>	

	<ul style="list-style-type: none"> • 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. • 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	<p>Valid reasons for not including a complaint are specified in our complaints policy.</p> <p>Complaint handlers are trained to apply discretion.</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	Yes	<p>The process for refusal of a complaint is included in complaint handler training.</p> <p>Complaint template letter's that complaint handlers edit to inform customers of complaint</p>	

	Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		details includes their right to take the decision to HOS and HOS contact details.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Included in complaint handler training.	All complaints are assessed individually. For example, bulk service charge complaints within a block are evaluated and addressed separately.

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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	<p>The Citizen website details all of the ways a customer can make a complaint which includes online, telephone and in person.</p> <p>Translation services are accessible for staff who take contacts from customers enabling complaints to be logged.</p> <p>Accessibility features are available for customers on our website.</p> <p>An Equality Impact Assessment on the complaints policy has been completed.</p>	
3.2	Residents must be able to raise their complaints in any	Yes	All Citizen staff complete a mandatory e-learning	

	<p>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.</p>		<p>complaints training. The training includes key points within the complaints process and what actions to take should a customer express dissatisfaction.</p> <p>Customers can raise complaints across a number of channels which are promoted/communicated to customers.</p> <p>An internal support page is accessible for all staff and holds the complaint policy, processes, and guidance for staff.</p>	
3.3	<p>High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.</p>	Yes	<p>This is included within an e-learning module that is mandatory for all staff.</p> <p>A Complaints Steering Committee is in place to review and assess themes and trends of complaints, performance, and compliance.</p>	

3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two-stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord's website.	Yes	<p>Citizen's complaints policy is available on the Citizen website. The website offers a translation tool and accessibility features for translation.</p> <p>The policy can be requested from staff members who can take account of customers accessibility needs.</p> <p>The policy details our two-stage process.</p>	The annual review of Citizens complaints policy will take place in Qtr 1 2025 and will be published to our website.
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	This is outlined in Citizen's complaints policy.	
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	The right to a third-party representative is outlined in Citizen's complaints policy.	

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	<p>Details of accessing the Housing Ombudsman service is included within written communications with the customer.</p> <p>Details of the Housing Ombudsman and how to access services are available on the Citizen website.</p>	A review of complaint template letters was completed in 24/25 to ensure consistency in detail about accessing the Ombudsman.
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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	<p>Complaints made to Citizen are handled by 'complaint handlers'</p> <p>A dedicated team, the Feedback and Resolution team have oversight of all Citizen complaints and liaison with the Housing Ombudsman Service.</p>	
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	'Complaint handlers' have access to all staff and are trained to resolve investigations promptly and fairly.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from	Yes	All Citizen staff complete mandatory e-learning complaints training.	Additional KPIs have been implemented in 24/25 in recognition of complaints being a core

	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		Learning is recorded and learning actions tracked. Additional staff have been trained to handle complaints.	service and to enable oversight of performance and compliance.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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	Citizens' complaints policy	
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	Citizen has a two-stage process.	
5.3	A process with more than two stages is not acceptable under	Yes	Citizen has a two-stage process.	

	any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.			
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	Citizen handle all complaints and may request information from a third party. This does not form an additional stage. This is stated within our policy.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	From April 2024, invitation to tenders are explicit with Citizen's expectation of handling complaints with third parties.	
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	Yes	Customer experience advisors and complaint handlers are trained in requesting and recording the complaint definition.	

	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	<p>Relevant colleagues have received training for exclusions.</p> <p>Where investigation is required to determine if the issue is Citizen's responsibility, this is included within the outcome correspondence.</p>	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <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; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	All complaint handlers are trained to investigate complaints	

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 included in complaint handler training and the complaints standard operating procedure.	
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	Vulnerability information is recorded. Large print letters/ audio letters.	We are reviewing our vulnerability definition and policy and will look to implement this in 2025/26.
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	See section 2	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original	Yes	Records are kept within our internal IT systems.	

	complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.			
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 handling staff receive training on appropriate remedies and authority to resolve 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	This policy is in place and has been reviewed by the customer assurance committee in March 2025.	
5.15	Any restrictions placed on contact due to unacceptable	Yes	As above.	

	behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.			
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Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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	<p>Vulnerability is recorded within complaints dashboards enabling staff to prioritise and consider customers need.</p> <p>A notification sent to staff alerting them to a complaint advises of customers who have a vulnerability.</p> <p>Daily reporting issued to Executive, Senior and Wider Leadership team members and nominated individuals show open complaints case details and links to further details enabling case prioritisation including vulnerability.</p>	<p>Our performance for year 24/25 was:</p> <p>6.9 days to resolve S1 (target 10 days)</p> <p>16.8 days to resolve S1 with extension (target 20 days)</p> <p>18.8 days to resolve S2 (target 20 days)</p> <p>32.6 days to resolve S2 with extension (target 20 days)</p>

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	Acknowledgement dates are recorded within our complaints IT system. Performance information is reported to the Citizen Board and the regulator.	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Complaint handling staff receive training on the expectations of complaint handling and timescales and what action is appropriate should an extension be required.	In 24/25, 90.75% of Stage 1 complaints were completed within 10 working days of the complaint being acknowledged. Whilst we comply, we will be increasing our performance target to 100% responded to on time in 25/26.
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	Complaint handling staff receive training on the expectations of complaint handling and timescales and what action is appropriate should an extension be required.	In 24/25, 6.0% of stage 1 complaints (274 out of 4,596) received an agreed extension.
6.5	When an organisation informs a resident about an extension to these timescales, they must	Yes	Complaint handling staff receive training on the expectations of complaint handling and timescales	

	be provided with the contact details of the Ombudsman.		<p>and what action is appropriate should an extension be required.</p> <p>Extension correspondence provides details of the Ombudsman.</p>	
6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Outstanding actions are confirmed within complaint response correspondence.	Improvements have been identified to track outstanding actions enabling monitoring to completion. This will be a focus 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 practice where appropriate.	Yes	Complaint handling staff receive training on the expectations of complaint handling and timescales including responding to all points raised by the customer.	Enhancements have been identified to increase the thoroughness of complaint investigations and outcomes, and this will be a key focus in 2025.
6.8	Where residents raise additional complaints during the investigation, these must	Yes	Complaint handling staff receive training on the expectations of complaint	

	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.		handling and timescales including responding to all points raised by the customer. Continuous refreshers and training for customer experience centre advisers	
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	Yes	Complaint handling staff receive training on the expectations of complaint handling and written communications.	

	not satisfied with the response.			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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	This is part of Citizens complaints policy and procedures.	In the period of 2024/2025, 14% of our Stage 1 complaints advanced to Stage 2.
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	This is part of Citizens complaints policy and procedures.	
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	This is part of Citizens complaints policy and procedures.	

6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	<p>This is part of Citizens complaints policy and procedures.</p> <p>Feedback and Resolution team staff handle all stage 2 complaints.</p>	
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	<p>This is part of Citizens complaints policy and procedures.</p> <p>Our Feedback and Resolution team handle all stage 2 complaints and have received training on complaint handling and timescales.</p>	<p>In 24/25, 91.67% of Stage 2 complaints were completed within 10 working days of the complaint being acknowledged</p> <p>Whilst we comply, we will be increasing our performance target to 100% responded to on time in 25/26.</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	<p>Our Feedback and Resolution team handle all stage 2 complaints and have received training on complaint handling and timescales.</p> <p>Should a complaint require extension, correspondence is sent to the customer and includes details of the Housing Ombudsman.</p>	In 24/25, 24.1% of stage 2 complaints (180 out of 746) received an agreed extension.

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	Should a complaint require extension, correspondence is sent to the customer and includes details of the Housing Ombudsman.	
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	Outstanding actions are confirmed within complaint response correspondence.	In 2025, we will focus on tracking and completing outstanding actions.
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	Our Feedback and Resolution team handle all stage 2 complaints and have received training on complaint handling.	
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;	Yes	Our Feedback and Resolution team handle all stage 2 complaints and have received training on complaint handling.	

	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.			
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Feedback and Resolution have access to staff at all levels to enable the resolution of complaints.	In 2025, efforts will focus on making complaint investigations more thorough.

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
7.1	Where something has gone wrong a landlord must acknowledge this and set out the actions it has already	Yes	Complaint handling staff receive training on the expectations of complaint handling and what	

	<p>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. 		<p>actions we are taking to put things right.</p> <p>Complaints handling staff also receive training on recording root cause and learning from complaints and encouraged to identify and record improvements.</p> <p>Citizen's compensation framework aligns to the Ombudsman guidance. Where applicable compensation is paid this is on a case-by-case basis.</p>	
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Feedback and Resolution team are trained in the compensation policy and advise complaint handlers on appropriate remedies.	During 24/25 we have awarded £165k in compensation payments.
7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate.	Yes	Complaints outcome correspondence outlines what actions Citizen will take to put things right.	In 2025, we will focus on tracking and completing outstanding actions.

	Any remedy proposed must be followed through to completion.		Internal It processes allow actions to be tracked to completion.	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	<p>Citizen's compensation policy takes into account the Ombudsman guidance.</p> <p>The Feedback and Resolution team regularly review Ombudsman guidance and cascade spotlight reports for review of relevant staff across Citizen.</p> <p>Unacceptable Behaviour Policy</p> <p>KIM Spotlight</p> <p>Damp and Mould Spotlight</p> <p>ASB Spotlight</p>	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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; 	Yes	<p>The annual complaints and service improvement report is published on our website alongside our self-assessment.</p>	<p>The 24/25 report is to be developed and shared with board before publishing to customers.</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>			
8.2	<p>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.</p>	Yes	<p>This will be shared with the Citizen Customer Assurance Committee in May 2025 and will be presented to our board for approval in September 2025. Our MRC's response will be published within the complaints performance and service improvement report.</p>	<p>The 24/25 report is to be developed and shared with board before publishing to customers.</p>
8.3	<p>Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.</p>	Yes	N/A	
8.4	<p>Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.</p>	Yes	No orders on 2024-25	
8.5	<p>If a landlord is unable to comply with the Code due to exceptional circumstances,</p>	Yes	<p>This is included within our major incident processes.</p>	

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

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation 2025
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	Complaints handling staff receive training on recording root cause and learning from complaints and encouraged to identify and record improvements.	<p>Learning from complaints is reviewed and themes and trends are reported and shared with relevant colleagues.</p> <p>The complaints steering committee meet regularly and review complaints performance, compliance and discuss learning from customer complaints, suggesting action for improvement.</p> <p>Housing Ombudsman determination reviews involve staff at Executive, Senior and Wider leadership team level who assess what improvements can be made because of learning from a complaint.</p>
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	The Executive Leadership Team and Board utilise complaints performance and learning reports to inform their decision making.	<p>As above.</p> <p>Citizen's scrutiny panel completed a review of complaints communications in 2024. The panel also review complaints reporting.</p> <p>Complaints data is shared with the panel for other areas undergoing a scrutiny review e.g.: shared ownership.</p>

				In 2024/25 case studies from complaints learning have been developed under Citizens, We Hear You campaign and shared with customers on the Citizen website.
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	The customer assurance committee, complaints steering group and leadership colleagues receive reporting on complaints performance which includes root cause and learning.	In 2024/25 case studies from complaints learning have been developed under Citizens, We Hear You campaign and shared with customers on the Citizen website and social channels.
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 Director of Customer Experience is the senior lead accountable for complaint handling.	We have analysed trends and themes, and the report's outputs are informing a service improvement plan for 2025/26. The unreasonable adjustments policy has been revised
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	Yes	A member of the Citizen Board has been appointed as MRC.	

	culture. This 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	The MRC and the Board receive regular reports on complaints performance.	<p>MRC receives monthly complaints performance report, and the Customer Assurance committee performance report</p> <p>MRC is sent details of all Housing Ombudsman determinations</p>
9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> 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	The MRC and the Board receives regular reports on complaints performance.	<p>MRC receives monthly complaints performance report, and the Customer Assurance committee performance report</p> <p>MRC is sent details of all Housing Ombudsman determinations</p>

	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>All Citizen staff have a standard objective in relation to complaints and receive training to support this objective.</p>	<p>Improvements have been identified and are to be explored in 2025 to ensure the objective is embedded.</p>