

This complaint definition is included in Citizen's complaints policy. The definition is embedded within the complaints e-learning module for all staff, complaint handler training and customer experience advisor training.

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	Comp Yes ly: Yes / No	Evidence	Commentary / explanation - 2026
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 is embedded within the complaints e-learning module for all staff, complaint handler training and customer experience advisor training.	Our complaints policy reflects this definition verbatim. Our training suite includes practical examples to reinforce it (all-staff e-learning, complaint handler training, CEX advisor training), refreshed during 2025/26 as part of the wider customer excellence training programme. Further Customer excellence culture training will be provided to all complaint handlers in 26/27 and will re-enforce definition.
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 for all staff, complaint handler training and customer experience advisor training.	Operational colleagues are trained to recognise expressions of dissatisfaction regardless of the words used. We accept complaints via MPs, councillors, advocates and legal representatives. We sample-check customer calls to assess whether

				complaints are logged when dissatisfaction is expressed. The introduction of new technology into call centre during 25/26 has provide improved quality assurance tools, and further roll out to operational teams in 26/27 will increase visibility and sentiment analysis across customer contacts.
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	Set out in Citizen's complaints policy and across the complaints e-learning, complaint handler training and CEX advisor training. Service requests are captured within ActiveH and monitored to completion	Call monitoring quality assessments continued in 2025/26, complementing feedback to advisers. A triage and quality-control mechanism is being strengthened during 2026/27 to improve the accuracy of the service-request versus complaint decision, to improve the quality of information gathered at first point of contact and reduce 'mis-diagnosed' complaints.
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	Yes	All staff have completed the mandatory e-learning module on complaints, which covers this requirement.	Reinforced through refreshed adviser training in 2025/26. Service requests continue to be progressed alongside any related complaint.

	the service request if the resident complains.			
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	Details of how to make a complaint are included within our Tenant Satisfaction Measures survey and ad hoc surveys sent to engaged customers.	Details of how to complain are not included within transactional SMS surveys, which are designed to be short and easy to respond to. Our 2025/26 complaints customer survey reinforced the need for clearer signposting and is informing improvements to survey communications.

Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation-2026
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	Valid reasons for not accepting a complaint are specified in our complaints policy and trained out to complaint handlers. Letters are sent to customers explaining the reason a complaint has not been accepted.	In 2025/26, 357 contacts submitted as complaints were assessed and not formally logged as complaints. MyAccount and website form contacts submitted as complaints are assessed before formal logging.
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 Claim Form and	Yes	Valid reasons for not accepting a complaint are specified in our complaints policy.	

	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	Valid reasons for not accepting a complaint are specified in our complaints policy. Complaint handlers are trained to apply discretion.	
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	The process for refusing a complaint is included in complaint handler training. Complaint template letters include the customer's right to take the decision to the Housing Ombudsman Service and the Ombudsman's contact details.	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.		Included in complaint handler training.	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation – 2026
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	The Citizen website details all the ways a customer can complain – online, telephone and in person. Translation services support staff taking customer contacts. Accessibility features are available on our website. An Equality Impact Assessment on the complaints policy has been completed.	Our 2025/26 customer survey highlighted a preference for phone and email and a desire for a single, easy route to complain. Findings are being used to simplify access, including work on a connected contact system (phone, chatbot and MyAccount).
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	All staff complete mandatory complaints e-learning covering the process and the actions to take when a customer expresses dissatisfaction. An internal support page holds the complaints policy, processes and guidance for all staff.	
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	Yes	Covered within the mandatory all-staff e-learning module. Citizens Customer Assurance Committee reviews themes,	In 2025/26 we closed 3,164 Stage 1 complaints (down from 4,596 in 2024/25). We continue to monitor volumes

	complaint volumes are potentially a sign that residents are unable to complain.		trends, performance and compliance.	as an indicator of accessibility alongside our demand analysis, which shows 93% of rentable dwellings recorded no complaint in 2025/26.
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	Citizen's complaints policy is available on the Citizen website, which offers translation and accessibility features. The policy can be requested from staff, who can take account of accessibility needs. The policy details our two-stage process.	The complaints policy was reviewed in 2025/26 with customer involvement, including a customer focus group (March 2025) and the co-design of a plain-English 'Policy on a Page' and complaints leaflet, responding to survey feedback
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	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.	Survey feedback in 2025/26 reinforced the value of allowing authorised representatives (family, friends and advocates), which our policy supports.
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	Details of accessing the Housing Ombudsman Service are included within written communications to customers and on the Citizen website.	Complaint template letters were reviewed to ensure consistent information about accessing the Ombudsman, and letters were further

				updated in 25/26 to make escalation rights clearer.
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Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation - 2026
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	Complaints are handled by trained 'complaint handlers'. The dedicated Feedback and Resolution Team (FRT) has oversight of all Citizen complaints and liaison with the Housing Ombudsman Service.	The Feedback and Resolution Team was restructured during 2025/26, including the recruitment of Resolution Business Partner roles, to support a preventative, learning-led model. An innovation and Service Quality role has been created to lead a structured learning framework.
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 staff at all levels and are trained to resolve investigations promptly and fairly.	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a	Yes	All staff complete mandatory complaints e-learning; learning is recorded and actions tracked. Additional staff have been trained to handle complaints.	Complaint KPIs are provided to Citizens board. Complaint performance is recognised as a core service enabling oversight of compliance. Service-improvement actions in

	core service and must be resourced to handle complaints effectively			2025/26 focused on strengthening communications to customers throughout their complaints journey, the quality of triage and the routing of Stage 1 work.
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation - 2026
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	Citizen's 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 any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Citizen has a two-stage process.	

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 handles all complaints and may request information from a third party; this does not form an additional stage, as stated in our policy.	
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	From April 2024, invitations to tender are explicit about Citizen's expectations for handling complaints with third parties.	Contractor oversight and accountability were recurring learning themes in 2025/26, prompting stronger monitoring of external contractors. Discussions are underway with engaged customers to co-create a contractor's code of conduct to improve consistency of service.
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	Customer experience advisors and complaint handlers are trained in requesting and recording the complaint definition.	Innovation and Quality lead role introduced in April 26 will monitor quality of records supporting new complaint cases
5.7	When a complaint is acknowledged at either stage, landlords must be clear	Yes	Relevant colleagues are trained on exclusions. Where	A new case processing system is set to be

	which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.		investigation is required to determine responsibility, this is set out in the outcome correspondence.	introduced in 26/27; this will support process changes regarding the ownership of complaint acknowledgement. Training will be provided to all complaint handlers and customer experience advisors as part of this project.
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	All complaint handlers are trained to investigate complaints objectively.	To support the transition to a new case processing system in 2026/27, all complaint handlers will receive training covering customer excellence culture, complaint investigation and outcome writing.
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	Included in complaint handler training and the complaints standard operating procedure.	
5.10	Landlords must make reasonable adjustments for residents where	Yes	Vulnerability information is recorded. Reasonable	Our new Vulnerability Policy has been embedded during

	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.		adjustments include, re-prioritisation of SLA's, using large-print and audio letters.	2025/26, ensuring services are adapted where customers have specific needs. Consulting vulnerable customers before major works was a specific learning theme this year and is being actioned.
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 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	Records are kept within our internal IT systems.	Record keeping was a focus following Housing Ombudsman findings. In 2026 we will progress migration of the ActiveH complaints module from desktop to web and moved Housing Ombudsman cases into the same system as complaint investigations, strengthening record integrity.
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	Yes	Complaint handling staff are trained on appropriate remedies and have authority to resolve at any stage.	

	at any stage of the complaints process without the need for escalation.			
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	The Unacceptable Behaviour Policy is in place and was reviewed by the Customer Assurance Committee in March 2025.	
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	As above.	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation - 2026
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	Vulnerability is recorded within complaints dashboards, enabling staff to prioritise and consider customer need. Notifications alert staff to complaints involving a vulnerability. Daily reporting to Executive, Senior and Wider Leadership teams shows open case details to support prioritisation.	Our complaint-handling timeliness performance for 2025/26 was: 5.6 days to resolve Stage 1 (target 10 days); 15.0 days to resolve Stage 1 with extension (target 20 days); 16.8 days to resolve Stage 2 (target 20 days); 33.1 days to resolve Stage 2 with extension (target 40 days)
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaint's procedure <u>within five working days of the complaint being received</u> .	Yes	Acknowledgement dates are recorded within our complaints IT system and performance is reported to the Citizen Board and the regulator.	The five-working-day acknowledgement standard has been adopted and embedded in line with the Code. During 26/27 the acknowledgment timeframe will be used to strengthen the triaging and allocation of complaints
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working</u>	Yes	Complaint handling staff are trained on complaint-handling timescales and the action	In 2025/26, 93.51% of Stage 1 complaints were completed within 10 working

	<u>days</u> of the complaint being acknowledged.		required if an extension is needed.	days of acknowledgement (2024/25: 90.75%). Following a Board decision, our performance target increased to 100% responded to on time for 2025/26.
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 are trained on when an extension is appropriate and how to inform the resident.	In 2025/26, 9.04% of Stage 1 complaints received an agreed extension
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	Extension correspondence provides the Ombudsman's contact details.	
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.	The migration of the complaints module to ActiveH web will improve our ability to track outstanding actions to completion, addressing a key 2024/25 improvement area.
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any	Yes	Complaint handling staff are trained to respond to all points raised by the customer.	A Stage 2 quality-control step (review of responses by relevant Directors, Heads

	decisions, referencing the relevant policy, law and good practice where appropriate.			of Service and/or Managers) has been strengthened to improve the thoroughness of investigations and outcomes.
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	Complaint handling staff and customer experience centre advisers receive training and continuous refreshers on this requirement.	
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	Complaint handling staff are trained on the expectations of complaint handling and written communications.	

Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation - 2026
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	Part of Citizen's complaints policy and procedures.	In 2025/26, 19% of Stage 1 complaints escalated to Stage 2 (2024/25: 14%). We closed 655 Stage 2 complaints, including 66 cases escalated from Stage 1 complaints raised in 2024/25.
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	Part of Citizen's 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	Part of Citizen's 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	Part of Citizen's complaints policy and procedures. Resolution officers with the Feedback and Resolution Team staff handle all Stage 2 complaints.	

6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Our Resolution officers handle all Stage 2 complaints and are trained on complaint handling and timescales.	In 2025/26, 96.42% of Stage 2 complaints were completed on time (2024/25: 91.67%). Our performance target increased to 100% responded to on time for 2025/26.
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	Where a Stage 2 complaint requires an extension, correspondence is sent to the customer including the Housing Ombudsman's details.	In 2025/26, 22.04% of Stage 2 complaints received an agreed extension (2024/25: 24.1%)
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	Extension correspondence includes the Housing Ombudsman's contact details.	
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.	Tracking outstanding actions to completion remains a focus, supported by the ActiveH web migration.
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any	Yes	Resolution officers with the Feedback and Resolution Team handle all Stage 2 complaints	

	decisions, referencing the relevant policy, law and good practice where appropriate.		and are trained 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; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	Resolution officers with the Feedback and Resolution Team handle all Stage 2 complaints and are trained on complaint handling.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Resolution officers within the Feedback and Resolution Team have access to staff at all levels to enable resolution of complaints.	In 2025/26, uphold rates rose from Stage 1 to Stage 2 (32% upheld at Stage 1 to 38% at Stage 2), reflecting thorough further review. Investigation thoroughness continues to be strengthened, including a new customer excellence culture training program

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation - 2026
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 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.	Yes	Complaint handling staff are trained on putting things right and on recording root cause and learning. Citizen's compensation framework aligns with Ombudsman guidance; compensation is paid on a case-by-case basis.	In 2025/26 the leading root causes were failure or delay to resolve an issue or repair (43%), poor communication (15%) and quality of service (13%). Learning from these themes is driving improvements in proactive communication, first-time-fix diagnostics and follow-on work management.
7.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.	Yes	Resolution officers within the Feedback and Resolution Team are trained in the compensation policy and advise complaint handlers on appropriate remedies.	In 2025/26, we awarded £138,000 in compensation payments. We have reviewed our compensation framework against Housing Ombudsman guidance, with further customer consultation planned for 2026/27.

7.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.	Yes	Complaints outcome correspondence outlines the actions Citizen will take to put things right. Internal IT processes allow actions to be tracked to completion.	Ensuring cases remain open until work is verified as complete was a strong theme in 2025/26 customer feedback and is a focus of our accountability and follow-through improvements.
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Citizen's compensation policy takes account of Ombudsman guidance. The Feedback and Resolution Team review Ombudsman guidance and cascade spotlight reports (e.g. Knowledge and Information Management, damp and mould, ASB, unacceptable behaviour) to relevant staff.	

Section 8: Self-assessment, reporting and compliance

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation - 2026
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. b. a qualitative and quantitative analysis of the landlord's complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord's performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.	Yes	The annual complaints and service improvement report is published on our website alongside our self-assessment.	The 2025/26 report is being developed for Board and publication. In 2025/26 we closed 3,164 Stage 1 and 655 Stage 2 complaints. Most complaints related to Repairs (40%) within Maintenance Operations (48% of all complaints), followed by Housing Care & Support (22%) and Building Safety (14%).

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	The self-assessment and annual report are considered by the Customer Assurance Committee and presented to the Board for approval, with the MRC's response published within the report.	The 2024/25 self-assessment was reviewed by the Customer Assurance Committee (7 May 2025) and approved by the Board (22 September 2025). The 2025/26 self-assessment and annual report follow the same governance route for scrutiny, challenge and approval.
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	Yes	Reflected in our governance arrangements.	The Feedback and Resolution Team restructure in 2025/26 has been accompanied by a review of complaint-handling procedures, reflected in this self-assessment.
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	Yes	Housing Ombudsman determinations are reviewed by relevant Directors and Heads of Service, with learning and improvement actions agreed.	In 2025/26, 88 Housing Ombudsman investigations were requested, with 33 determinations received as of 4 June 2026, including 2 severe maladministration findings; 12 (36%) resulted in no maladministration and no service failure. Improvement actions have been agreed across complaint handling, damp and mould and window repairs, record keeping, and

				responsiveness to repairs, and this self-assessment reflects that learning.
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	Yes	Included within our major incident processes.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation - 2026
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	Complaint handling staff are trained on recording root cause and learning, and encouraged to identify and record improvements. An effectiveness of learning report is presented to the Customer Assurance Committee every six months.	Learning is reviewed, with key themes shared with relevant colleagues. Housing Ombudsman determination reviews involve Senior and Wider Leadership colleagues to agree service improvements. A new Feedback and Resolution Team structure has been introduced, including Business Partner, Innovation, and Service Quality roles, to support a preventative, learning-led complaints culture. In 2025/26, learning focused on proactive communication, first-time fixes, follow-on works and contractor oversight.
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	Yes	The Executive Leadership Team and Board use complaints performance and learning reports to inform decision-making.	We are strengthening a preventative, learning-led complaints culture. Our 'Putting our customers first' transformation portfolio uses

	introduce positive changes in service delivery.			complaints insight to priorities service improvement initiatives. Case studies continue to be shared with customers under our 'We Hear You' campaign.
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 performance, root cause and learning.	In 2025/26 complaints learning continued to be shared with customers via the 'We Hear You' campaign, the website and social channels, and with the customer 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 and procedures that require revision.	Yes	The Director of Customer Experience is the senior lead accountable for complaint handling.	Analysis of 2025/26 themes and trends is informing the service improvement plan for 2026/27. The Vulnerability Policy has been revised and embedded, and triage and gatekeeping arrangements have been strengthened.
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 Citizen Board, Angela Carpenter, is appointed as 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.	The MRC receives a monthly complaints performance report and the Customer Assurance Committee performance report, and is sent details of all Housing Ombudsman determinations.
9.7	As a minimum, the MRC and the governing body (or equivalent) must receive: a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report.	Yes	The MRC and the Board receive regular reports on complaints performance, trends and Ombudsman determinations.	Reporting in 2025/26 includes progress on actions arising from the year's severe maladministration findings, alongside volumes, categories, outcomes and performance.
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	Yes	All staff have a standard objective in relation to complaints and receive training to support it.	In 2025/26 we rolled out immersive customer excellence training to embed a consistent, collaborative approach to complaints and customer service at every interaction.

	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.			
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