

Citizen Self-Assessment Form

Compliance with the Revised Housing Ombudsman Code – V1.1 – August 2023

Section 1 - Definition of a complaint

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
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 organisation, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.'</i>	Yes	The complaint definition is included within our policy and published on our Citizen website.
1.3	The resident does not have to use the word 'complaint' for it to be treated as such. A complaint that is submitted via a third party or representative must still be handled in line with the landlord's complaints policy.	Yes	Citizen colleagues are aware of this through our internal communication channels. This is also captured within our Complaints Policy.
1.6	... if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.	Yes	We try to resolve an issue raised by a customer at the earliest opportunity, where an issue cannot be resolved a complaint is logged.
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.	Yes	
1.8	A complaints policy must clearly set out the circumstances in which a matter will not be considered, and these circumstances should be fair and reasonable to residents.	Yes	This is outlined in our complaint's policy document.
1.9	If a landlord decides not to accept a complaint, a detailed 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.	Yes	The is outlined within our complaint's procedure.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
1.4	Landlords should recognise the difference between a service request , where a resident may be unhappy with a situation that they wish to have rectified, and a complaint about the service they have/have not received.	Yes	Citizen staff are trained and have received internal communication to this effect.
1.5	Survey feedback may not necessarily need to be treated as a complaint, though, where possible, the person completing the survey should be made aware of how they can pursue their dissatisfaction as a complaint if they wish to.	Yes	Low scoring survey feedback about how we have delivered a service will result in a customer call back and will be discussed to understand the customers score. Where necessary a complaint is registered.

Section 2 - Accessibility and awareness

Mandatory 'must' requirements

Code section	Code requirement	Compl y: Yes/ No	Evidence, commentary and any explanations
2.1	Landlords must make it easy for residents to complain by providing different channels through which residents can make a complaint such as in person, over the telephone, in writing, by email and digitally. While the Ombudsman recognises that it may not be feasible for a landlord to use all of the potential channels, there must be more than one route of access into the complaints system.	Yes	A complaint can be made via phone, letter, social media, our customer portal 'My Account,' in person to a Citizen staff member and via our website 'Log a complaint' form.
2.3	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the number of stages involved, what will happen at each stage and the timeframes for responding.	Yes	Our Complaints Policy is available to residents via our website which provides accessible ways to review the information including a browse aloud function.
2.4	Landlord websites, if they exist, must include information on how to raise a complaint. The complaints policy and process must be easy to find on the website.	Yes	Information and contact options for how to raise a complaint are within our 'Feedback and Complaints' and 'Contact us' sections of our website.

2.5	Landlords must comply with the Equality Act 2010 and may need to adapt normal policies, procedures, or processes to accommodate an individual's needs. Landlords must satisfy themselves that their policy sets out how they will respond to reasonable adjustments requests in line with the Equality Act and that complaints handlers have had appropriate training to deal with such requests.	Yes	An Equality Impact Assessment is completed alongside our complaints policy review.
2.6	Landlords must publicise the complaints policy and process, the Complaint Handling Code and the Housing Ombudsman Scheme in leaflets, posters, newsletters, online and as part of regular correspondence with residents.	Yes	Our complaints policy is displayed on our website and our membership of the Housing Ombudsman Scheme is within the 'Feedback and Complaints' section of our website. We will also notify our customers raising a complaint by phone to our Customer Service Centre. Our membership of the Housing Ombudsman Scheme is also promoted through our complaint response letters, posters displayed within communal areas and within emails to our new customers.
2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Links to the Housing Ombudsman website are provided within Citizen's complaint outcome letters. Housing Ombudsman contact details are provided via our website and posters displayed in communal areas of our properties.
2.8	Landlords must provide early advice to residents regarding their right to access the Housing Ombudsman Service throughout their complaint, not only when the landlord's complaints process is exhausted.	Yes	Information regarding access to the Housing Ombudsman is provided to the customer at our acknowledgement of their complaint, and upon resolution of a Stage 1 complaint.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
	Where a landlord has set up channels to communicate with its residents via social media, then it should expect	Yes	Our Complaints Policy outlines that we will

2.2	to receive complaints via those channels. Policies should contain details of the steps that will be taken when a complaint is received via social media and how confidentiality and privacy will be maintained.		accept complaints via social media and outlines how we will respond.
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Section 3 - Complaint handling personnel

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.1	Landlords must have a person or team assigned to take responsibility for complaint handling to ensure complaints receive the necessary attention, and that these are reported to the governing body. This Code will refer to that person or team as the "complaints officer".	Yes	Our Feedback and Resolution Team are assigned to take responsibility for complaints and their investigation. Their manager is considered the complaints officer. The Citizen Board receives quarterly reports about complaints performance, root causes and actionable insights.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Our Feedback and Resolution team are trained and investigate complaints in an impartial manner. They have an induction and training programme to ensure their skills are kept up to date. The Manager and Team leader attend external training and networking groups to keep abreast of best practice.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	Complaint handlers should: <ul style="list-style-type: none"> • be able to act sensitively and fairly • be trained to handle complaints and deal with distressed and upset residents • have access to staff at all levels to facilitate quick resolution of complaints • have the authority and autonomy to act to resolve disputes quickly and fairly. 	Yes	Our Feedback and Resolution team receive regular training. They have an induction and training programme to ensure their skills are kept up to date. The Manager and Team leader attend external training and networking groups to keep abreast of best practice.

Section 4 - Complaint handling principles

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	Any decision to try and resolve a concern must be taken in agreement with the resident and a landlord's audit trail/records should be able to demonstrate this. Landlords must ensure that efforts to resolve a resident's concerns do not obstruct access to the complaints procedure or result in any unreasonable delay. It is not appropriate to have extra named stages (such as 'stage 0' or 'pre-complaint stage') as this causes unnecessary confusion for residents. When a complaint is made, it must be acknowledged and logged at stage one of the complaints procedure within five days of receipt .	Yes	Our Customer Relations System records all contact with customers, and we capture information to enable us to improve our services. Where a customer requests for a complaint to be logged this will be honoured and registered as a Stage 1 unless we can resolve the situation quickly for the customer. Our complaints process has two stages which are clearly outlined to customers on our website. We have implemented a case processing system within our housing operations technology which ensures all steps of the process is recorded and that there is an audit trail.
4.2	Within the complaint acknowledgement, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	When a complaint is made, a customer will receive an automatic acknowledgement followed by a further contact within one working day of the complaint receipt to discuss the reason for the complaint and their desired resolution. If we cannot reach the customer within one working day, we will continue to contact the customer during the investigation to clarify our understanding of the complaint within 5 working days,
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Our Feedback and Resolution team conduct an impartial review of customer complaints.

4.7	<p>The complaint handler must:</p> <ul style="list-style-type: none"> • deal with complaints on their merits • act independently and have an open mind • take measures to address any actual or perceived conflict of interest • consider all information and evidence carefully • keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter. 	Yes	Our Feedback and Resolution team are trained to complete a comprehensive complaint review, which will be quality assured by the Feedback and Resolution Management team.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	We discuss this within our first call within our complaint acknowledgements with customers. We also consider any customer preferred method of contact already recorded.
4.12	<p>The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to:</p> <ul style="list-style-type: none"> • set out their position • comment on any adverse findings before a final decision is made. 	Yes	We outline in our standard operating procedure that we will call customers to discuss the expected outcome of their complaint.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Timescales are included.
4.14	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints procedure and must have clear and valid reasons for taking that course of action. Reasons for declining to escalate a complaint must be clearly set out in a landlord's complaints policy and must be the same as the reasons for not accepting a complaint	Yes	This is outlined with our Complaints Policy.
4.15	A full record must be kept of the complaint, any review 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 reports or surveys prepared.	Yes	Records of the complaint investigation and contacts with customers are held in our systems.

4.18	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives when pursuing a complaint.	Yes	An Unreasonably Persistent Contact Policy is in place.
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Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.3	Landlords should manage residents' expectations from the outset, being clear where a desired outcome is unreasonable or unrealistic	Yes	The Feedback & Resolution team contact customers to discuss the complaint and manage expectations of resolution.
4.4	A complaint should be resolved at the earliest possible opportunity, having assessed what evidence is needed to fully consider the issues, what outcome would resolve the matter for the resident and whether there are any urgent actions required.	Yes	The Feedback & Resolution team will conduct an initial evaluation of the complaint.
4.5	Landlords should 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 where this is reasonable.	Yes	This is included within our complaints policy and will be put in practice after receiving customers authority to act.
4.8	Where a key issue of a complaint relates to the parties' legal obligations landlords should clearly set out their understanding of the obligations of both parties.	Yes	This is an ongoing area of focus. Legal obligations for access for the Annual Gas Service, Right for Repair and Fire Safety are clearly stated to the customer if this is within the scope of the complaint. This also includes Citizen's obligation and the customers obligation to the tenancy agreement.

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	On occasion where a customer has identified a named individual in their complaint the response may include this information support our customers understanding.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Customers are called when the complaint received, and they receive a text on day 5 for stage 1s and day 10 for stage 2 updating on the progress of their complaint.
4.16	Landlords should seek feedback from residents in relation to the landlord's complaint handling as part of the drive to encourage a positive complaint and learning culture.	Yes	A Customer Satisfaction Survey is sent upon the closure of a complaint case to understand the customer's experience. Feedback is used to make improvements to our service.
4.17	Landlords should recognise the impact that being complained about can have on future service delivery. Landlords should ensure that staff are supported and engaged in the complaints process, including the learning that can be gained	Yes	We regularly report to staff and customers how we have improved services because of their dissatisfaction via our <i>Customer Annual Report</i> and our <i>Complaints Infographic</i> published quarterly. Staff have access to complaints reports monthly. Our Feedback and Resolution Team liaise with Managers across the business to resolve complaints, this ensures that staff who may be the subject of a complaint are supported by their line managers to ensure the quality of future service delivery
4.19	Any restrictions placed on a resident's contact due to unacceptable behaviour should be appropriate to their needs and should demonstrate regard for the provisions of the Equality Act 2010.	Yes	Our Unreasonable Persistent Contact Policy ensures that we consider customers individual needs. We conduct Equality Impact Assessments on all our policies to ensure that our policies do not directly or indirectly discriminate against particular groups of customers

Section 5 - Complaint stages

Mandatory 'must' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.1	Landlords must respond to the complaint <u>within 10 working days</u> of the complaint being logged. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This is included in our complaint's procedure.
5.5	A complaint response must be sent 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 expeditiously with regular updates provided to the resident.	Yes	This is included in our complaint's procedure.
5.6	Landlords must address all points raised in the complaint and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	This is included in our complaint's procedure.
5.8	Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language: <ul style="list-style-type: none">• the complaint stage• the decision on the complaint• the reasons for any decisions made• the details of any remedy offered to put things right• details of any outstanding actions• details of how to escalate the matter to stage two if the resident is not satisfied with the answer	Yes	This is included in our complaint's procedure and included in all outcomes which are regularly quality assured by the Feedback and Resolution Management team. We revised our response letters in June 2023 to follow a templated format to ensure that all these areas are covered.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.9	If all or part of the complaint is not resolved to the resident's satisfaction at stage one it must be progressed to stage two of the landlord's procedure, unless an exclusion ground now applies. In instances where a landlord declines to escalate a complaint it must clearly communicate in writing its reasons for not escalating as well as the resident's right to approach the Ombudsman about its decision.	Yes	This is included in our complaint's procedure.
5.10	On receipt of the escalation request, landlords must set out their understanding of issues outstanding and the outcomes the resident is seeking. If any aspect of the complaint is unclear, the resident must be asked for clarification and the full definition agreed between both parties.	Yes	When a Stage 2 case is logged, we aim to contact the customer within one working day to understand why the customer has escalated their complaint to ensure our understanding of their dissatisfaction.
5.11	Landlords must only escalate a complaint to stage two once it has completed stage one and at the request of the resident.	Yes	This is included in our complaint's procedure.
5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	This is included in our complaint's procedure.
5.13	Landlords must respond to the stage two complaint <u>within 20 working days</u> of the complaint being escalated. Exceptionally, landlords may provide an explanation to the resident containing a clear timeframe for when the response will be received. This should not exceed a further 10 days without good reason.	Yes	This is included in our complaint's procedure.

5.16	<p>Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions <p>and</p> <ul style="list-style-type: none"> if the landlord has a third stage, details of how to escalate the matter to stage three if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied. 	Yes	<p>We revised our response letters in June 2023 to follow a templated format to ensure that all these areas are covered.</p> <p>Citizen has a two-stage complaint process.</p>
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Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.17	Two stage landlord complaint procedures are ideal. This ensures that the complaint process is not unduly long. If landlords strongly believe a third stage is necessary, they must set out their reasons for this as part of their self-assessment. A process with more than three stages is not acceptable under any circumstances.	N/A	Citizen operates a two-stage complaints procedure.
5.20	<p>Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language:</p> <ul style="list-style-type: none"> the complaint stage the complaint definition the decision on the complaint the reasons for any decisions made the details of any remedy offered to put things right details of any outstanding actions details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied 	N/A	Citizen operates a two-stage complaints procedure.

Best practice 'should' requirements

Stage 1

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.2	If an extension beyond 20 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is included in our complaint's procedure.
5.3	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response.	Yes	This is included in our complaint's procedure.
5.4	Where the problem is a recurring issue, the landlord should consider any older reports as part of the background to the complaint if this will help to resolve the issue for the resident.	Yes	Within the investigation of a complaint, historical reports of an issue are considered
5.7	Where residents raise additional complaints during the investigation, these should be incorporated into the stage one response if they are relevant and the stage one response has not been issued. Where the stage one response has been issued, or it would unreasonably delay the response, the complaint should be logged as a new complaint.	Yes	This is included in our complaint's procedure.

Stage 2

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.14	If an extension beyond 10 working days is required to enable the landlord to respond to the complaint fully, this should be agreed by both parties.	Yes	This is included in our complaint's procedure.
5.15	Where agreement over an extension period cannot be reached, landlords should provide the Housing Ombudsman's contact details so the resident can challenge the landlord's plan for responding and/or the proposed timeliness of a landlord's response	Yes	This is included in our complaint's procedure.

Section 6 - Putting things right

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.1	Effective dispute resolution requires a process designed to resolve complaints. 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.	Yes	Citizen includes our actions to resolve a complaint within a customers outcome response.
6.2	Any remedy offered must reflect the extent of any service failures and the level of detriment caused to the resident as a result. A landlord must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to other residents.	Yes	Citizen includes our actions to resolve a complaint within a customers outcome response, also discussing the resolution with the customer in advance of the complaint closure.
6.5	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	Citizen includes our actions to resolve a complaint within a customers outcome response.
6.6	In awarding compensation, a landlord must consider whether any statutory payments are due, if any quantifiable losses have been incurred, the time and trouble a resident has been put to as well as any distress and inconvenience caused.	Yes	How we will award compensation where it is relevant, is outlined in our Complaints Policy in line with our compensation framework.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
6.3	Landlords should look beyond the circumstances of the individual complaint and consider whether anything needs to be 'put right' in terms of process or systems to the benefit of all residents.	Yes	Learning from complaints is shared with the relevant teams within Citizen and examples of learning are published within our customer annual report. We have a complaints steering committee that includes senior leaders from across the business to examine trends and themes from complaints to look for cross

			organisational learning and to implement improvements
6.7	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where possible, obtaining legal advice as to how any offer of resolution should be worded.	Yes	We have access to solicitors to assist us where necessary if we need further advice on meeting our legal obligations.

Section 7 - Continuous learning and improvement

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.2	Accountability and transparency are integral to a positive complaint handling culture. Landlords must report back on wider learning and improvements from complaints in their annual report and more frequently to their residents, staff and scrutiny panels.	Yes	Our Customer Annual Report is published on our website. We publish a quarterly infographic for our customers highlighting complaint performance and actions to improve customer satisfaction. We report complaints performance, trends and actionable insights to our Customer Assurance Committee who is set up to assure our Board that we are meeting the Ombudsman's code of practice.

Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
7.3	A member of the governing body should be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This role will be responsible for ensuring the governing body receives regular information on complaints that provides insight to the governing body on the landlord's complaint handling performance.	Yes	Citizens Board and Customer Assurance Committee oversees our complaints performance, trends and actionable insights and is chaired by a member of the Citizen Board.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders Regular reviews of issues and trends arising from complaint handling, The annual performance report produced by the Ombudsman, where applicable Individual complaint outcomes where necessary, including where the Ombudsman made findings of severe maladministration or referrals to regulatory bodies. The implementation of management responses should be tracked to ensure they are delivered to agreed timescales. The annual self-assessment against the Complaint Handling Code for scrutiny and challenge. 	Yes	<p>The Annual Housing Ombudsman Report, Ombudsman referrals and Determinations are reported quarterly to the Citizen Board.</p> <p>Citizens Customer Assurance Committee receive regular updates on complaints performance including any issues and trends from complaint handling.</p> <p>Our Customer Assurance Panel scrutinise our annual self-assessment against the Complaints Handling Code and recommend it to our Board for approval</p>



7.5	Any themes or trends should be assessed by senior management to identify potential systemic issues, serious risks or policies and procedures that require revision. They should also be used to inform staff and contractor training.	Yes	<p>Reporting on themes and trends is provided monthly to senior management for them to review with their teams, and to identify local action plans and areas for improvement.</p> <p>We have implemented a Complaints Steering Group made up of senior leaders from across the business who meet bi-monthly to consider trends, pull out learning and insight and agree improvement actions they are responsible for implementing</p>
7.6	<p>Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to:</p> <ul style="list-style-type: none"> • have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments • take collective responsibility for any shortfalls identified through complaints rather than blaming others • act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing. 	No	Our organisation behaviours reflect the requirement for effective complaint handling which has been communicated to all colleagues. All colleagues have a standard objective for 23-24 that relates to their responsibility for resolving complaints as part of our performance annual review framework.

Section 8 - Self-assessment and compliance

Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
8.1	Landlords must carry out an annual self-assessment against the Code to ensure their complaint handling remains in line with its requirements.	Yes	Citizen publishes our findings on our website.
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	A monthly review has been scheduled to ensure that there are no significant changes which require a revision to the published self-assessment. This self assessment is being completed following a move to recording and processing complaints within a new module in our housing operations technology
8.3	<p>Following each self-assessment, a landlord must:</p> <ul style="list-style-type: none"> report the outcome of their self-assessment to their governing body. In the case of local authorities, self-assessment outcomes should be reported to elected members publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents include the self-assessment in their annual report section on complaints handling performance 	Yes	<p>The Feedback & Resolution Team Manager will share any significant changes to the Citizen management team.</p> <p>Our Customer Assurance Panel scrutinise our annual self-assessment against the Complaints Handling Code and recommend it to our Board for approval before we publish it on our website</p>

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Self-assessment completed by: 'Customer Engagement and Feedback Manager' and 'Feedback and Resolution Team Manager'

Approved by Citizen Board Members: August 2023. Next review due to commence June 2024