

## Appendix B – Self-Assessment Form

This self-assessment form should be completed by the complaints officer and discussed at the landlord’s governing body annually.

Evidence should be included to support all statements with additional commentary as necessary.

Explanations must also be provided where a mandatory ‘must’ requirement is not met to set out the rationale for the alternative approach adopted and why this delivers a better outcome.

### 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	Section 3.1 of complaints policy. Dolphin Living define a complaint 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>
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	Section 3.2 of 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.		Section 3.2 of the complaints policy <i>‘For example, a call from a customer asking us to repair a leaking tap is a request for a repair service, and will not be treated as a complaint that the tap has broken. A call from a customer reporting that, despite their previous reports, an operative has not arrived to fix the tap is a complaint about our service and will be dealt with in accordance with this policy.’</i>
1.7	A landlord must accept a complaint unless there is a valid reason not to do so.		Section 2.1a of the complaints policy

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	<p>Section 2.2 of complaints policy</p> <p><i>It is not normally possible to deal with complaints using this policy where:</i></p> <p><i>a) Complaints are submitted anonymously (although we may still investigate)</i></p> <p><i>b) The matter being complained about is directly linked to legal proceedings already started by the complainant, Dolphin Living or its agent, or has already been considered via the complaints process, the courts, or another tribunal</i></p> <p><i>c) The complaint concerns the content of an approved Dolphin Living policy</i></p> <p><i>d) Complaints are submitted more than 12 months after the event being complained of,</i></p> <p><i>e) Exceptional circumstances apply</i></p>
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	<p>Section 2.1a of the complaints policy</p> <p><i>Dolphin Living will accept a complaint unless there is a valid reason not to do so. If Dolphin Living decides not to accept a complaint, we will provide evidence and our reasons for refusal. We will ensure that all complaints are handled individually and on their own merit.</i></p> <p><i>If Dolphin Living does not accept a complaint the resident has the right to take their complaint to the Housing Ombudsman or Property Ombudsman.</i></p>

**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 <b>service request</b> , where a resident may be unhappy with a <b>situation</b> that they wish to have rectified, and a <b>complaint</b> about the <b>service</b> they have/have not received.	Yes	Section 3.2 of the complaints policy <i>'A service request is when you ask your landlord to act, for example, carry out a repair or investigate antisocial behavior you are experiencing in your home. This will not be treated as a complaint but you may formally look to raise this as a complaint if you are unsatisfied with the outcome.'</i>
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	The Dolphin Living customer service team monitor all survey feedback. If a resident raises an issue that is not something we are already aware of, this is logged as a dissatisfaction of service & dealt with by the relevant team. If the resident has left contact details they are contacted directly and the complaints procedure explained to them.

## Section 2 - Accessibility and awareness

### Mandatory 'must' requirements

Code section	Code requirement	Comply: 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	Section 3.5 of complaints policy <i>'Complaints can be made, in writing (e.g. letter, email), by telephone, in person, or by bringing the matter to the attention of a member of staff at a meeting or appointment.'</i>
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	Section 3.5 (a) of the complaints policy <i>'If residents are unable to communicate their complaint in English or have accessibility needs, we can discuss the best method of communication for them. For example, we can arrange a translator for residents whose first language is not English'</i>
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	More info on website: <a href="https://www.dolphinliving.com/for-residents">https://www.dolphinliving.com/for-residents</a>
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	Section 3.5 (a) of the complaints policy <i>'If residents are unable to communicate their complaint in English or have accessibility needs, we can discuss the best method of communication for them. For example, we can arrange a translator for residents whose first language is not English'</i>
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	These are publicised on the Dolphin Living website, in our resident newsletter & during the complaints process

2.7	Landlords must provide residents with contact information for the Ombudsman as part of its regular correspondence with residents.	Yes	Contact details given to resident on stage 1 and 2 complaint response, in resident newsletter and on the Dolphin Living website
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	Contact details given to resident on stage 1 and 2 complaint response

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
2.2	Where a landlord has set up channels to communicate with its residents via social media, then it should expect 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.	N/A	Dolphin Living does not currently communicate with residents via social media channels

### 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	The Dolphin Living customer service team oversee all complaint handling. Our operations team Customer Services Manager Ryan O'Connor handles all Stage 1 complaints. Our lead Customer Services Manager Ummy Bajuny handles all Stage 2 complaints.
3.2	...the complaint handler appointed must have appropriate complaint handling skills and no conflicts of interest.	Yes	Absolutely, all the customer service team are experience and sufficient in complaint handling, with no conflicts of interest.

### Best practice 'should' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
3.3	<p>Complaint handlers should:</p> <ul style="list-style-type: none"> <li>• be able to act sensitively and fairly</li> <li>• be trained to handle complaints and deal with distressed and upset residents</li> <li>• have access to staff at all levels to facilitate quick resolution of complaints</li> <li>• have the authority and autonomy to act to resolve disputes quickly and fairly.</li> </ul>	Yes	<p>Absolutely, all the customer service team are experienced and sufficient in complaint handling, undertaking regular training to further enhance their skills. They remain impartial and objective at all times with no conflicts of interest. They have access to staff at all levels across the organisation. They have the authority to make decisions and issue their responses independently.</p>

### Section 4 - Complaint handling principles

#### Mandatory 'must' requirements

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
4.1	<p>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 <b>within five days of receipt</b>.</p>	Yes	<p>Correspondence between residents and our managing agent and customer service teams are saved and noted on our operational CRM system Qube.</p> <p>We aim to resolve a residents concerns as quickly as possible but provide awareness of the complaints procedure throughout.</p> <p>We do not have extra named stages. Stage 1 is the initial complaint &amp; dealt with by our managing agent. Stage 2 with Dolphin Living Directors. If the resident remains unsatisfied the next stage is to contact the Housing Ombudsman.</p> <p>Complaints are acknowledged within 3 working days of receiving.</p>

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	Section 4.3 of the complaints policy. We confirm that the complaint has been received, it is understood and is being investigated, and confirm the timeframe of when they can expect a response. If any part of the complaint is unclear we will contact the resident for further clarification.
4.6	A complaint investigation must be conducted in an impartial manner.	Yes	Section 1.1 and 1.2 of the complaints policy
4.7	The complaint handler must: <ul style="list-style-type: none"> <li>• deal with complaints on their merits</li> <li>• act independently and have an open mind</li> <li>• take measures to address any actual or perceived conflict of interest</li> <li>• consider all information and evidence carefully</li> <li>• keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter.</li> </ul>	Yes	Section 1.1 and 1.2 of the complaints policy All complaints are treated confidentially, independently and on their own merit. They are fully investigated with all evidence reviewed and appropriate staff liaised with. If there is any perceived or actual conflict of interest this is dealt with or the complaint moved to another team member.
4.11	Landlords must adhere to any reasonable arrangements agreed with residents in terms of frequency and method of communication	Yes	During the complaints process the customer services manager will provide regular updates regarding the issue and complaint. This is in addition to the formal agreements of 10 working days for Stage 1 response and 20 working days for Stage 2 response..
4.12	The resident, and if applicable any staff member who is the subject of the complaint, must also be given a fair chance to: <ul style="list-style-type: none"> <li>• set out their position</li> <li>• comment on any adverse findings before a final decision is made.</li> </ul>	Yes	If complaint is about a member of staff or another resident, they would be given the opportunity to explain their understanding and version of events. This would be conducted in line with GDPR regulations.
4.13	A landlord must include in its complaints policy its timescales for a resident to request escalation of a complaint	Yes	Section 4.4 & 5.1 of the complaints policy <i>'If the Investigating Officer cannot resolve the complaint by the end of the following working day (the 3<sup>rd</sup> working day since receiving the complaint) the matter will be formally investigated, and a determination will be reached as to whether the complaint is</i>

			<p><i>upheld. The Investigating Officer will have 10 working days to investigate the complaint but will aim to reach their determination as quickly as possible. The Investigating Officer will write to the complainant setting out the result of the investigation and letting the complainant know what actions have been or will be taken. If this is not possible, an explanation and a date by which the Stage 1 will be received will be given. The extension will not exceed a further 10 days.'</i></p> <p><i>'If a complainant's concerns remain unresolved after receiving their Stage 1 final response, within 20 working days of receipt, they may request a review by members of the Dolphin Living Senior Management team.'</i></p>
<b>4.14</b>	A landlord must not unreasonably refuse to escalate a complaint through all stages of the complaints	Yes	Section 5.5 & 5.6 of the complaints policy



	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.		
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	All complaints, the investigation & evidence and outcomes are saved on our property managers CRM system Qube & our internal sharepoint.
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	Section 7 of the complaints policy

### 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	Section 3 of the complaints policy
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	Section 4.3 and 4.4 of the complaints policy
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	Section 3.5 (b) of the complaints policy <i>'Dolphin Living will 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.'</i>
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	Any legal obligations would be clearly set out in our response to the resident

4.9	Communication with the resident should not generally identify individual members of staff or contractors.	Yes	All information in communication will be kept as anonymous as possible.
4.10	Landlords should keep residents regularly updated about the progress of the investigation.	Yes	Customer Service Manager provides constant updates throughout.
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	Residents given the opportunity to give feedback in the Customer Satisfaction Survey, at resident engagement meetings and following the complaints process.
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	Section 3.6 of the complaints policy <i>'We welcome complaints as an opportunity to learn and to improve our service and relationship with our residents. We will not respond in a defensive manner, with any judgement or bias, nor will we primarily focus on matters of fault or blame. We will listen to residents, understand the circumstances of the complaint, and will focus on resolving the complaint to the resident's satisfaction.'</i>
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	Any restrictions placed on a residents contact would be reviewed specific to that individual in line with the Equality Act 2010.

## 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 <b><u>within 10 working days</u></b> 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	Section 4.3 and 4.4 of the complaints policy
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	A complaint response will be sent as soon as possible and within the required timeframes. Any outstanding actions will be tracked by the customer services team who will provide the resident with regular updates

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	<p>All decisions made in complaint response are clearly explained and addressed. If compensation/goodwill is offered, the calculation amount as per the policy is explained.</p> <p>If the complaint has not been upheld due to policy as per the tenancy agreement or property law, this is referenced to the resident. For example, a resident made a stage 1 complaint about not being able to sublet a room. This was not upheld as per Dolphin Living policy stated in their tenancy that subletting is not allowed.</p>
5.8	<p>Landlords must confirm the following in writing to the resident at the completion of stage one in clear, plain language:</p> <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> <li>• details of how to escalate the matter to stage two if the resident is not satisfied with the answer</li> </ul>	Yes	All Stage 1 responses contain all the required information. Example copies are available on request.

## 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	Section 5.1 of the complaints policy <i>'If a complainant's concerns remain unresolved after receiving their Stage 1 final response, within 20 working days of receipt, they may request a review by members of the Dolphin Living Senior Management team.'</i>
	On receipt of the escalation request, landlords must set out their	Yes	Section 5.2 of the complaints policy

5.10	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.		<i>'The complainant should explain with which parts of the Stage 1 response they remain dissatisfied and why. We also ask that they set out what they would consider an acceptable resolution to their complaint.'</i>
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	Section 5.1 of the complaints policy

5.12	The person considering the complaint at stage two, must not be the same person that considered the complaint at stage one.	Yes	Section 5.3 of the complaints policy <i>'The review will be conducted by the Customer Services Director and the Asset Management Director or another Director at Dolphin Living not previously involved in the complaint.'</i>
5.13	Landlords must respond to the stage two complaint <b><u>within 20 working days</u></b> 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	Section 5.1 of the complaints policy
5.16	Landlords must confirm the following in writing to the resident at the completion of stage two in clear, plain language: <ul style="list-style-type: none"> <li>• the complaint stage</li> <li>• the complaint definition</li> <li>• the decision on the complaint</li> <li>• the reasons for any decisions made</li> <li>• the details of any remedy offered to put things right</li> <li>• details of any outstanding actions</li> </ul> <b>and</b> <ul style="list-style-type: none"> <li>• if the landlord has a third stage, details of how to escalate the matter to stage three</li> <li>• if this was the final stage, details of how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.</li> </ul>	Yes	All Stage 2 responses contain all the required information. Example copies are available on request.  Section 6.1 and 6.3 of the complaints policy <i>'If complainants are dissatisfied with the outcome of their Stage 2 complaint, they can complain further to the relevant independent ombudsman service.'</i> <i>'Complainants whose tenancy is with Dolphin Housing Limited can complain to the Housing Ombudsman as set out in 6.5. More information about this service is available here: <a href="http://www.housing-ombudsman.org.uk/">http://www.housing-ombudsman.org.uk/</a></i>

### 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.	Yes	Stage 1 complaints are dealt with by the customer services manager at our management agent, The complaint is responded to within 10 working days. Stage 2 complaints are escalated to the landlord, Dolphin Living, which are responded to within 20 working days.

			We do not have a Stage 3. If residents remain unsatisfied following their Stage 2 response they can escalate their complaint to the Housing Ombudsman.
--	--	--	--

5.20	Landlords must confirm the following in writing to the resident at the completion of stage three in clear, plain language: <ul style="list-style-type: none"> <li>the complaint stage</li> <li>the complaint definition</li> <li>the decision on the complaint</li> <li>the reasons for any decisions made</li> </ul>		
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	If an extension is required we would write to the resident clearly detailing the reasons why and receive their agreement in writing before proceeding.
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	The Housing Ombudsman details are provided throughout the complaint process
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	Complaints are constantly reviewed. Every quarter, we review the category of the cause of complaints, for example 'financial, maintenance, service, ASB'. A lessons learnt analysis is carried out by the customer service team to see which areas can be improved.  Recurring themes are reviewed further and proactive steps taken.
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	The customer service manager ensures that any additional complaints are responded to within the stage 1 response if appropriate. If not this will be logged as a new response and dealt with separately following the complaints process.

## 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	If an extension is required we would write to the resident clearly detailing the reasons why and receive their agreement in writing before proceeding.
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	The Housing Ombudsman details are provided throughout the complaint process

## Stage 3

Code section	Code requirement	Comply: Yes/No	Evidence, commentary and any explanations
5.18	Complaints should only go to a third stage if the resident has actively requested a third stage review of their complaint. Where a third stage is in place and has been requested, landlords must respond to the stage three complaint <b><u>within 20 working days</u></b> of the complaint being escalated. Additional time will only be justified if related to convening a panel. An explanation and a date for when the stage three response will be received should be provided to the resident.	Yes	We do not have a Stage 3. If residents remain unsatisfied following their Stage 2 response they can escalate their complaint to the Housing Ombudsman.
5.19	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	The Housing Ombudsman details are provided throughout the complaint process



## 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	Clearly explained in complaint response. When a complaint is upheld, any failure is acknowledged, actions taken are explained, and the compensation policy may apply.
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	Any compensation is awarded as per the policy and any resolutions offered are realistic and within Dolphin Living's capability.
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	We provide a clear timeframe of when the issue can be resolved e.g repair completed or alternative options for the resident in the meantime. Any compensation/goodwill offered to the resident is pending their acceptance. We give them a clear timeline of when the payment will be made upon bank details being sent in acceptance.

### 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	All complaints are reviewed by the customer services team and the customer services director. This includes analysing reasons and themes and makes changes to processes and systems where necessary. For example we have recently carried out a review of our repairs service as this area is our largest cause for complaints and are making changes to a number of processes
	In some cases, a resident may have a legal entitlement to redress. The landlord should still offer a resolution where	Yes	We have a compensation policy in which

6.7

possible, obtaining legal advice as to how any offer of resolution should be worded.

residents may be entitled to either:

'Compensation' for a service failure. This would include a heating or hot water outage in which residents would be entitled to 40% of their daily rate of rent for hot water and 60% for heating.

For the loss of the use of a room, residents are awarded a percentage redress of their daily rate of rent.

Discretionary compensation may also be applicable in certain cases where there has been a service failure or a breach in SLA's.

Goodwill payments may also be applicable in a case where there has not been a service failure as per the SLA's, however we believe that the level of service has fallen short of what a resident deserved.

We obtain legal advice from our solicitors at all times when necessary.

## 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	We report on learning and improvements at our quarterly Operations Committee, in resident newsletters and engagement events and publish an annual report. The customer service team review lesson learnt from complaints at monthly meetings.

### 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	Ben Laryea is our Member Responsible for Complaints. He is also a Board Member and sits on our Operational Committee.
7.4	As a minimum, governing bodies should receive: <ul style="list-style-type: none"> <li>Regular updates on the volume, categories and outcome of complaints, alongside complaint handling performance including compliance with the Ombudsman's orders</li> <li>Regular reviews of issues and trends arising from complaint handling,</li> <li>The annual performance report produced by the Ombudsman, where applicable</li> <li>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.</li> </ul>	Yes	A Customer Services Report which includes a review of complaints, complaint handling, trends and learnings is produced and analysed by Board Members on a quarterly basis at our Operations Committee.

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.		The Customer Services Director and Asset Management Director review all themes and trends on a continual basis.
7.6	Landlords should have a standard objective in relation to complaint handling for all employees that reflects the need to: <ul style="list-style-type: none"> <li>• have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments</li> <li>• take collective responsibility for any shortfalls identified through complaints rather than blaming others</li> <li>• act within the Professional Standards for engaging with complaints as set by the Chartered Institute of Housing.</li> </ul>	Yes	Dolphin Living is a non hierarchical organisation with a customer centric approach running throughout. All teams collaborate together to resolve resident issues and we focus on resolution not blame. Our staff undergo CIH training.

## 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	
8.2	Landlords must also carry out a self-assessment following a significant restructure and/or change in procedures.	Yes	
8.3	Following each self-assessment, a landlord must: <ul style="list-style-type: none"> <li>• 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</li> <li>• publish the outcome of their assessment on their website if they have one, or otherwise make accessible to residents</li> <li>• include the self-assessment in their annual report section on complaints handling performance</li> </ul>	Yes	