

Policy and Procedure for Complaints & Redress associated with rental of residential property

Purpose of this Policy

To ensure St John's Winchester (SJW) has an effective system in place for dealing with and reacting to complaints made against SJW and that improvements are made to those areas of dissatisfaction and to ensure that issues of compensation are dealt with fairly and consistently.

We want our residents to have confidence that we listen, learn and take prompt action to put matters right. We strive to provide fair and effective resolution to any complaint and use the learnings to drive service improvements.

Policy statement

We are a charity with responsibility for 96 almshouses and a further 21 residential properties within our investment portfolio and we have developed this policy to address the following principles:

- SJW's Complaints Policy has been implemented in line with its Charitable Objects and the Regulator of Social Housing's Regulatory Code and Guidance.
- SJW has a defined formal 2-Stage complaints system that is easily accessible and ensures a thorough and fair investigation.
- SJW collects and publishes information on complaints so that it knows which areas of service residents are most unhappy with.
- SJW ensures that all staff fully understand the complaints system and understand what constitutes a complaint as opposed to a service request.
- SJW will consider a range of remedies for justified complaints.
- SJW have adopted the Housing Ombudsman Complaints Handling Code and SJW operates a two stage complaints process. If a customer remains dissatisfied with the outcome of their complaint having been through our internal complaints process, they have the right to take their complaint to the Housing Ombudsman. We are bound by the terms of the Housing Ombudsman's scheme and will fully co-operate with all requests for information made by the Ombudsman, work with them in resolving complaints effectively and adhere to orders and recommendations made to put things right.

The Housing Ombudsman and SJW commitment

The Housing Ombudsman is an independent arbitrator in the housing sector. It offers a fair and impartial service, resolving customer complaints when things can't be resolved between the resident and SJW. SJW is a member of the Housing Ombudsman Scheme and is committed to developing and maintaining a good working relationship with the Housing Ombudsman.

To evidence compliance with the Housing Ombudsman Code, SJW will complete a Self-Assessment annually, at the end of each financial year.

Performance Measures

We will review our performance in processing complaints and improving our service based on the following records:

- Number of complaints received by service area.
- The percentage of complaints received dealt with within 10 working days at Stage 1.
- Number of complaints referred to Stage 2.
- Number of complaints referred to the Housing Ombudsman Service.
- Results of findings by the Housing Ombudsman Service.
- Number of satisfactory outcomes arising from the complaint.

Responsibility

Member Responsible for Complaints/ Board Member	Linda Bonnin, Chair of Property Management and Oversight Committee
Complaints Officer/Director	Tim Bissett, CEO
Policy Author(s)	Siân Duxbury, Investment Property Manager
Date Approved by Board	23 September 2025
Frequency of Review & Date	Annually as part of Self-Assessment – last reviewed May 2025
Version	2
Date of Next Review	May 2026
Consultees	Residents Staff Management Team SJW Board

Complaints Policy

1) Scope of Policy

1.1 SJW regards compliments and complaints as a positive source of feedback and as learning opportunities that will enable it to be more responsive to residents.

1.2 SJW will attempt to resolve any issues or queries immediately through an appropriate course of action, without the need for recourse to the complaints procedure.

1.3 SJW ensures that its compliments and complaints system:

- is well publicised, simple to understand and easy to use.
- Ensures consistency and fairness in complaint case handling and in handling of compliments and suggestions - with a resident-focused approach.
- Commits to taking action to put things right and find appropriate remedies.
- Supports a positive complaint handling culture through continuous learning and improvement.
- Is non-discriminatory.
- Allows timely handling, with established timescales for responses and ensures customers are informed of progress.
- Ensures a full and thorough investigation.
- Respects customers' confidentiality.
- Provides information to colleagues, Managers and Directors so that services can be continuously improved.
- Follows the Housing Ombudsman's Complaint Handling Code. We will continue to self-assess it annually, as well as respond whenever the Code is revised.
- Meets regulatory requirements.
- Delivers a better service to customers by monitoring and measuring complaints, compliments and suggestions and taking action to listen and learn.
- Allows speedy handling, with established time limits to keep people informed.
- Ensures a full and fair investigation, addressing all the points at issue.
- Respects people's desire for confidentiality.
- Provides an effective response and appropriate redress.
- Provides information to management so that services can be improved.

1.4 SJW will follow a standard procedure to ensure consistency in how it deals with complaints.

1.5 SJW will collect and publish information on complaints so that it knows which areas of service can be improved for residents.

2) Outline of Service

2.1 Complaints

2.1.1 SJW defines a complaint as:

'An expression of dissatisfaction, however made (either verbally or in writing), about the standards of service, action or lack of action by SJW or its staff, or those acting on it's behalf affecting an individual resident or group of residents, or their representative where such complaints cannot be resolved at the point of service delivery.' For the purpose of this policy the use of the word 'resident' can refer to any of the affected parties.

2.1.2 The following list is a guide to the range of complaints considered in this policy but is by no means exhaustive:

- Failure to provide a service or to achieve the required standards/quality.
- Employee attitudes and their actions or lack of actions.
- Dissatisfaction with the manner in which SJW's standards and procedures have been carried out as laid down within policy.
- Discrimination.

2.1.3 The following are not considered within the scope of the complaints procedure:

- A standard request for a service.
- A request for information or an explanation.
- A first-time request for some type of repair or ground maintenance work to be carried out.
- An insurance claim.
- Information or an explanation of SJW's policy or practice.
- 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.

SJW can refuse a complaint for one of the above reasons, 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.

2.1.4 SJW will aim to resolve any problem as soon as possible through an appropriate course of action without going through the formal complaints system, however if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.

2.1.5 SJW will ensure that when a resident is making a complaint that all the necessary information is gathered from the complainant to enable a full and proper investigation to be carried out, referencing the relevant policy law and

good practice where appropriate. This will be recorded accurately while respecting residents' desire for confidentiality.

2.1.6 SJW will accept anonymous complaints, even though it can be difficult to conduct a full investigation without knowing the identity of the resident. If a resident approaches us with a complaint but wishes to remain anonymous, we will explain the process to the resident and ask how they want to be advised of the outcome of an investigation. Where we do not have any details of the resident, colleagues will still log and investigate the complaint.

2.1.7 SJW will treat all residents with respect and provide them with the best service possible. Residents may appoint advocates or representatives to act on their behalf throughout the complaints process.

2.1.8 In the interests of fairness and consistency, SJW will operate a formal two-stage complaints system. It will consider a range of remedies for justified complaints while recognising that each case must be considered on its own merits.

2.1.9 A resident does not have to use the word 'complaint' for it to be treated as such. Complaints that are submitted by a third party or representative, such as an MP, should still be handled in line with the complaints policy.

3) Complaints Procedure

3.1 The leaflet 'Complaints Policy' will be publicised and available for use by anyone wishing to complain about any aspect of SJW's service and will be available in translation.

3.2 Complaints will be accepted in a number of ways, including:

- By telephone.
- by face to face.
- by letter.
- by email.
- via social media.
- Via a Councillor or MP or other relevant third party (e.g., Housing Ombudsman or consumer rights organisation).

3.3 Timescales stated below are all from the date of receipt by SJW. SJW's CEO must be made aware of all complaints.

3.4 Service Request

3.4.1 SJW recognise the difference between a service request and a complaint. A service request is a request from a resident to SJW requiring action to be taken to put something right and a response. Service requests will be recorded, monitored and reviewed regularly. A complaint should be raised when the resident raises dissatisfaction with the response to their service request.

3.4.2 Chasers on a service request, such as a missed appointment, can often be resolved by SJW 'there and then' with an apology and the provision of another appointment and may not need to enter the complaints system. However, if further enquiries are needed to resolve the matter, or if the resident requests it, the issue must be logged as a complaint.

3.5 Stage 1

3.5.1 Any resident wishing to make a complaint to SJW will be able to ask for the issue to be considered as a formal complaint.

3.5.2 The complaint will be dealt with by the most appropriate Director who will investigate the complaint fully and may contact the resident to:

- Acknowledge the complaint within 5 days of receipt.
- Clarify the complaint.
- Clarify the outcome sought.
- Check whether they need support of any kind.
- Check if any support is needed to understand the discussion properly (e.g. for poor sight or hearing or a language need).
- Explain the investigation procedure.
- Be clear where the desired outcome is unrealistic or unreasonable.

3.5.3 Where the complaint is against an individual member of staff that person will not investigate the complaint; a Director who is not involved in the issue will deal with the complaint. Staff will be told immediately about a complaint against them, given the opportunity to tell their side of things and be kept informed of progress and the result.

3.5.4 A full written response will be sent within 10 working days from when the complaint is logged. Where further investigation is required which means it will exceed 10 working days, the resident will be notified in writing. Where the problem is a recurring issue, SJW should consider any older reports as part of the background to the complaint if this will help resolve the issue for the resident.

3.5.5 Where agreement over an extension period cannot be reached, SJW will provide the Housing Ombudsman's contact details so the resident can challenge SJW's plan for responding and/or the proposed timeliness of a landlord's response.

The response must confirm the following in writing to the resident at the Completion of stage one in clear, plain language:

- The compliant 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 stage two if the resident is not satisfied with the answer.

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.

3.5.6 Where the resident raises 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 additional complaint should be logged as a new complaint.

3.5.7 To move to Stage Two of the complaints process, residents are asked to answer the following questions (residents do not have to do this in writing and where necessary we can provide support):

- a) What specific parts of their original complaint we have not investigated?
- b) What part of our response do you disagree with and why?
- c) What would you like the outcome of your complaint to be? (What would you like us to do?)

3.6 Stage 2

3.6.1 If the resident remains dissatisfied, they will be able to ask for the complaint to be re considered, giving the reasons why the decision of stage 1 is unacceptable. On receipt of the escalation request, the resident should answer the questions SJW asked in the stage 1 response. SJW must set out its understanding of issues 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. Complaints can only be escalated to Stage 2 once Stage 1 has been fully completed and at the request of the resident.

In instances where SJW declines to escalate a complaint, it must clearly communicate in writing its reasons for not escalating as well as the resident's rights to approach the Ombudsman about its decision.

3.6.2 This takes the form of a Review Meeting. The Chair of SJW's Board will arrange for a panel comprising of 3 Board Members to consider the complaint.

3.6.3 The Review Meeting will be arranged within 15 working days from receipt of the request to re-consider. The resident and / or their representative will be invited to attend.

3.6.4 Residents will be advised in writing of the findings of the Review Meeting within 5 working days of the hearing.

3.6.5 A full written response will be sent within 20 working days from when the complaint is logged. Where further investigation is required which means it will exceed 10 working days, the resident will be notified in writing.

3.6.6 Where agreement over an extension period cannot be reached, SJW will provide the Housing Ombudsman's contact details so the resident can challenge

SJW's plan for responding and/or the proposed timeliness of a landlord's response.

3.6.7 The following must be confirmed in writing to the resident at the completion of stage two in clear, plain language:

- The complaint stages.
- 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 and how to escalate the matter to the Housing Ombudsman Service if the resident remains dissatisfied.

4) Housing Ombudsman Service

4.1 Where a resident has exhausted SJW's internal complaints procedure but remains dissatisfied with the outcome, they may take their complaint to the Housing Ombudsman Service.

5) Monitoring Complaints

5.1 The number and nature of complaints received will be monitored by the full Resident's forum & Board.

5.2 The number, nature and outcome of all official complaints will be published annually, along with any subsequent changes to services as a direct result of these.

6) Putting Things Right

6.1 Where something has gone wrong SJW must acknowledge this and set out the actions it has already taken, or intends to take, to put things right.

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. SJW must carefully manage the expectations of residents and not promise anything that cannot be delivered or would cause unfairness to the other residents.

6.3 The remedy offer must clearly set out what will happen and when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.

6.4 In awarding compensation, SJW 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.

6.5 SJW have a redress table for compensation that we adhere to. Additionally in a severe maladministration case we will use the Housing Ombudsman's suggested range of compensation levels, copy attached, see Annex 1.

6.6 Every effort will be made to ensure that claims are dealt with as quickly as possible and within timescales set out according to the Compensation Act 2006.

7) Consultation

7.1 SJW will consult residents about any changes to SJW's practice and policy, in line with the arrangements established by our resident involvement practices.

8) Review of the Policy

8.1 An annual self-assessment must be carried out against the Code to ensure compliant handling remains in line with its requirements. Landlords must also carry out a self-assessment following a significant restructure and/ or change in procedures.

8.2 A separate self-assessment must be carried out following a significant restructure and/or change in procedures.

8.3 Following each self-assessment, SJW must:

- report the outcome of their self-assessment to the Board.
- publish the outcome of their assessment on the website if they have one, or otherwise make it accessible to residents.
- include the self-assessment in their annual report section on complaints handling performance.

9) Legislation and Guidance

9.1 SJW will ensure that its approach to dealing with complaints claims is in line with the with the Equality Act 2010, Localism Act 2011; the subsequent Housing White Paper 2021 and with the Regulator of Social Housing's regulatory guidelines. It will ensure that this policy is compatible with the obligations of all existing Legislation.

Annex 1

The Ombudsman may make more than one finding when determining a case. The table below reflects the financial remedy for each finding rather than the total amount for the case.

Level of redress	Likely associated finding	Impact on resident	Circumstances
£50 to £100	Service failure	• Minimal • Short duration • May not have significantly affected the overall outcome for the resident • Might include distress and inconvenience, time and trouble, disappointment, loss of confidence, and delays in getting matters resolved	There was minor failure by the landlord in the service it provided and it did not appropriately acknowledge these and/or fully put them right. The landlord may have made an offer of action/compensation but it does not quite reflect the detriment to the resident and/or is not quite proportionate to the failings identified by our investigation.
£100 to £600	Maladministration	• No permanent impact	There was a failure which adversely affected the resident. The landlord has failed to acknowledge its failings and/or has made no attempt to put things right. Or The landlord has acknowledged failings and/or made some attempt to put things right but failed to address the detriment to the resident and/or the offer was not proportionate to the failings identified by our investigation.

£600 to £1,000	Maladministration/ severe maladministration	• Significant impact • Physical and/or emotional impact	There was a failure which had a significant impact on the resident. The circumstances for maladministration apply and the redress needed to put things right is substantial Or The circumstances for severe maladministration apply but the redress needed to put things right is at the lower end of that scale.
£1,000 +	Severe maladministration	• Severe long-term impact	There have been serious failings by the landlord. There was a single significant failure in service or a series of significant failures which have had a seriously detrimental impact on the resident. The landlord's response to the failures (if any) exacerbated the situation and further undermined the landlord/resident relationship. The landlord repeatedly failed to provide the same service which had a seriously detrimental impact on the resident; demonstrating a failure to provide a service, put things right and learn from outcomes. The failures accumulated over a significant period of time (however this will not necessarily be the case as a single significant service failure may be sufficient).