

Complaints and Redress Policy

Revised September 2026

Policy owner	Chief Executive
Complaints Officer	Chief Executive
Member Responsible for Complaints	Linda Bonin
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Next review	September 2027, or earlier if requirements change

Our commitment: We welcome complaints as an important source of insight. We will listen, respond fairly, put things right where we can, and use what residents tell us to improve homes and services.

1. Purpose and principles

This policy explains how St John's Winchester (SJW) receives, investigates and resolves complaints about its residential landlord services. It reflects the Housing Ombudsman's statutory Complaint Handling Code and is intended to provide a simple, accessible and fair two-stage process.

We will apply the Housing Ombudsman's dispute resolution principles:

- be fair
- put things right
- learn from outcomes

Residents will not be treated adversely because they have complained. Complaint handling is a core landlord service and will be properly resourced, recorded, monitored and reported.

2. Scope

This policy applies to expressions of dissatisfaction about housing and landlord services provided directly by SJW or on its behalf. It covers almshouse residents and

tenants of SJW residential properties, former residents where the issue falls within the relevant time limit, and people authorised to act for them.

It includes complaints about:

- the standard, delivery or absence of a landlord service, including repairs, maintenance, grounds and communal areas;
- the actions, decisions, behaviour or lack of action of SJW staff, volunteers, contractors, managing agents or others acting on our behalf;
- the application of a housing policy or procedure;
- communication, delays, record keeping, equality, accessibility or reasonable adjustments; and
- the handling of a previous service request or complaint.

Where another procedure is more appropriate - for example safeguarding, whistleblowing, employment, data protection, an appeal created by a separate policy, or a complaint about a regulated care provider - we will explain this clearly and signpost the person to the correct route. We will not use another procedure to prevent a housing complaint from being considered under this policy where the Code applies.

3. What is a complaint?

Definition: A complaint is an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by SJW, its own staff, or those acting on its behalf, affecting a resident or group of residents.

A resident does not have to use the word 'complaint'. Whenever dissatisfaction is expressed, we will give the resident the choice to make a complaint. A complaint made by a representative will be handled in the same way, subject to appropriate authority and data protection checks.

3.1 Service requests

A service request asks SJW to take action to put something right, such as a first report of a repair. Service requests are recorded, monitored and reviewed, but are not complaints. If a resident is dissatisfied with the response to a service request, a complaint must be raised even if work on the service request is continuing. We will not stop action to resolve the underlying issue because a complaint has been made.

3.2 Surveys and anonymous complaints

Dissatisfaction expressed through a survey is not automatically a complaint. Wherever possible, respondents will be told how to make a complaint. All wider requests for resident feedback will include information about the complaints process.

We will record and consider anonymous complaints where sufficient information is available. We will explain that anonymity may limit our ability to investigate or provide an individual response.

4. Matters we may exclude

We will accept a complaint unless there is a valid, fair and reasonable reason not to do so. Each case will be considered on its own merits; we will not apply blanket exclusions.

We may decide not to consider a matter where:

- the issue occurred, or became known to the residents, more than 12 months before the complaint was made, although we will consider exercising discretion where there are good reasons, including vulnerability or a continuing or recurring issue;
- legal proceedings have started, meaning a Claim Form and Particulars of Claim have been filed at court. Pre-action correspondence or seeking legal advice does not by itself exclude a complaint;
- the same matter has already been considered fully under this policy and there is no material new information; or
- the matter is outside SJW's responsibility or the Housing Ombudsman's jurisdiction, in which case we will explain any more suitable route.

A request for information, insurance claim or service request is not in itself a complaint, but dissatisfaction about how SJW handled it may be a complaint.

If we refuse to accept or escalate a complaint, we will write to the resident with reasons, explain their right to ask the Housing Ombudsman to review that decision, and provide the Ombudsman's contact details. If the Ombudsman tells us the exclusion was not fairly applied, we will accept the complaint.

5. Accessibility, representation and support

A complaint may be made to any member of staff. Staff must recognise dissatisfaction and pass it promptly to the Complaints Officer. Complaints are accepted face to face, by telephone, letter, email, social media or through a representative. We will not require a complaint to be submitted on a particular form.

Residents may:

- appoint a representative or advocate and be accompanied at meetings;
- request information in an alternative format or language;
- ask for reasonable adjustments under the Equality Act 2010; and
- receive help from SJW to explain or record their complaint.

We will record agreed reasonable adjustments and disclosed disabilities only where necessary, protect the information appropriately, and keep adjustments under active review. We will consider known vulnerability, risk and communication needs throughout the process.

6. Responsibilities and independence

6.1 Complaints Officer

The Chief Executive is the Complaints Officer unless another suitably senior officer is nominated. The Complaints Officer has access to staff at all levels and sufficient authority and autonomy to resolve complaints promptly and fairly, liaise with the Ombudsman, ensure records are complete, monitor outstanding remedies and report performance and learning.

6.2 Complaint handlers

At each stage, complaint handlers must:

- consider the complaint on its merits, act independently and keep an open mind;
- give the residents a fair opportunity to explain their position;
- identify and address any actual or perceived conflict of interest;
- consider all relevant information and evidence carefully; and
- communicate in clear, plain and respectful language.

A person who is the subject of a complaint, or materially involved in the events, will not determine it. Staff affected will be treated fairly and given an appropriate opportunity to provide information.

6.3 Contractors and third parties

SJW remains responsible for complaints about services delivered on its behalf. Contractors and managing agents must cooperate with our investigation, record dissatisfaction and provide information promptly. Any contractor response forms part of SJW's two-stage process; a resident will not be required to complete a separate contractor process before accessing Stage 1 or Stage 2. Contract monitoring will include complaint themes, outcomes, remedies and learning where relevant.

7. The two-stage complaints process

Stage	Acknowledge, define and log	Full response	Maximum extension
Stage 1	Within 5 working days of receipt	Within 10 working days of acknowledgement	Up to 10 further working days, with good reason

Stage 2	Within 5 working days of escalation request	Within 20 working days of acknowledgement	Up to 20 further working days, with good reason
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When acknowledging either stage, we will set out our understanding of the complaint and the outcomes sought (the complaint definition), clarify anything unclear, and state which matters are and are not our responsibility.

7.1 Early resolution

We will try to resolve issues promptly and locally where possible, but we will not create an informal 'Stage 0'. If a resident asks to complain, or further enquiry is needed to resolve dissatisfaction, the matter will be logged at Stage 1.

7.2 Stage 1

The Complaints Officer will allocate a suitable person to investigate. The response will address every point in the complaint definition and give clear reasons for decisions, referring where appropriate to policy, law and good practice.

The written Stage 1 response will confirm:

- the complaint stage and complaint definition;
- the decision and reasons;
- any remedy offered and what will happen by when;
- any outstanding actions and how they will be monitored; and
- how to request Stage 2.

Related additional issues raised before the response will normally be incorporated where this will not cause unreasonable delay. Unrelated matters, or matters raised after the response, will be logged as a new complaint.

7.3 Stage 2

If all or part of the complaint remains unresolved to the residents' satisfaction, it will progress to Stage 2. The residents are not required to explain their reasons for requesting Stage 2, although we will make reasonable efforts to understand what remains unresolved and the outcome sought.

Stage 2 is the final response. It will be considered by a suitably senior person who did not decide Stage 1 and, where appropriate, by an independent panel appointed by the Chair. All suitable staff needed to issue a complete response will be involved. A meeting is not mandatory, but may be offered where it would help achieve a fair resolution.

The written Stage 2 response will confirm:

- the complaint stage and complaint definition;
- the final decision and reasons;
- any remedy offered and what will happen by when;
- any outstanding actions and how they will be monitored; and
- how to bring the complaint to the Housing Ombudsman.

7.4 Extensions and outstanding actions

If an extension is needed because of complexity or other good reason, we will tell the resident before the deadline, explain why, give the revised response date and provide the Housing Ombudsman's contact details. We will agree suitable intervals for updates. Longer extensions will be exceptional and supported by clear reasons.

We will issue the complaint response when the answer is known rather than waiting for every remedial action to finish. Outstanding actions will be assigned, tracked to completion and reported to the resident at agreed intervals.

8. Urgent risk, hazards and safeguarding

Where a complaint indicates an immediate risk to health or safety, a safeguarding concern, serious disrepair or a potentially significant hazard, staff will activate the appropriate operational procedure immediately while the complaint continues. Where applicable, this includes the statutory timescales under Awaab's Law. Relevant risk and vulnerability will also inform how quickly the complaint itself should be resolved.

9. Putting things right and redress

Where something has gone wrong, SJW will acknowledge it and explain what has been or will be done. Remedies will reflect the actual impact on the resident, not simply the seriousness of the service failure in the abstract.

Possible remedies include:

- a sincere apology and acknowledgement of what went wrong;
- an explanation, practical assistance or correction of records;
- completing delayed action, changing a decision or restoring the resident to the position they would otherwise have been in;
- reimbursement of evidenced financial loss or a proportionate compensation payment;
- a service, policy, procedure, training or contractual improvement; and
- other action agreed with the resident where appropriate.

The remedy will state what will happen and by when, and will be followed through. When considering financial redress, we will take account of statutory payments, evidenced loss, distress and inconvenience, time and trouble, vulnerability, duration, severity, and whether our response aggravated the impact. We will use the current

Housing Ombudsman Guidance on Remedies as a guide rather than treating its ranges as fixed tariffs or limits.

10. Records, confidentiality and data protection

A complete complaint record will be maintained, including the original complaint and date received; acknowledgements; the agreed complaint definition; correspondence with the resident and other parties; evidence, reports and surveys; decisions and reasons; responses; remedies; outstanding actions; reasonable adjustments where relevant; and closure date.

Personal information will be processed in accordance with the UK GDPR, Data Protection Act 2018, SJW's privacy information and records-retention arrangements. Information will be shared only where necessary to investigate, resolve, assure or report the complaint, or where required by law. Confidentiality cannot be guaranteed where information indicates a safeguarding or serious safety risk.

11. Unacceptable behaviour and contact restrictions

We will not restrict access to the complaints process merely because a resident is persistent, distressed or challenging. Any restriction arising from unacceptable behaviour must follow SJW's relevant policy, be evidence-based, proportionate, time-limited, communicated with reasons, take account of the Equality Act 2010, and be kept under regular review. Wherever possible, a reasonable route of contact will remain available.

12. Housing Ombudsman Service

Residents may contact the Housing Ombudsman at any point for information and support. After SJW's Stage 2 response, or where the Ombudsman considers that SJW is not progressing the complaint properly, the resident may ask the Ombudsman to consider the matter. We will cooperate with requests for information and comply with orders within the required timescale.

Online	www.housing-ombudsman.org.uk/contact-us/ (preferred)
Telephone	0300 111 3000
Post	Housing Ombudsman Service, PO Box 1484, Unit D, Preston PR2 0ET
Note	From 13 January 2026, new case enquiries are not accepted by email.

13. Monitoring, learning and governance

The Complaints Officer will monitor complaint volumes, categories, outcomes, response-time performance, refused complaints, remedies, outstanding actions,

equality and vulnerability themes, contractor performance, resident feedback, Ombudsman enquiries and decisions, and service improvements.

The Board will appoint a suitably senior lead person accountable for complaint handling and a trustee as Member Responsible for Complaints (MRC). The MRC will have access to relevant staff and information, scrutinise whether practice reflects this policy and the self-assessment, and provide assurance to the Board.

As a minimum, the MRC and Board will receive:

- regular information on complaint volumes, categories, outcomes and timeliness;
- reviews of trends, systemic risks, learning and delivery of remedies;
- updates on Ombudsman investigations, findings, orders and recommendations; and
- the annual complaints performance and service improvement report, incorporating the annual self-assessment.

The annual report and the Board's clearly identifiable response will be published in the complaints section of SJW's website. Relevant learning will also be shared with residents, staff, committees and contractors. A report will be produced even if no complaints were received during the year.

14. Self-assessment, publication and review

SJW will complete the Housing Ombudsman's current self-assessment at least annually. It will also reassess and, where required, resubmit following a significant restructure, merger, acquisition, material change in complaint procedures or operating environment, activation of business continuity arrangements affecting compliance, or an Ombudsman order or recommendation.

The self-assessment will be completed in full, supported by specific evidence, scrutinised by the MRC and approved by the Board. It will be published with the annual complaints performance and service improvement report and the Board's response. Any non-compliance will include the reason, action required and target date for compliance.

This policy will be reviewed annually and sooner if the Code, Scheme, law, regulatory requirements, operating model or Ombudsman guidance changes. Material changes will be communicated accessibly to residents and staff.

15. Legal and regulatory framework

This policy has been reviewed with reference to:

- Housing Ombudsman Complaint Handling Code (statutory from 1 April 2024);

- Housing Ombudsman Scheme 2024-26 and the revised Scheme effective 1 October 2026;
- Housing Act 1996, as amended, including by the Localism Act 2011, Building Safety Act 2022 and Social Housing (Regulation) Act 2023;
- Equality Act 2010;
- Data Protection Act 2018 and UK General Data Protection Regulation;
- Regulator of Social Housing consumer standards, where applicable;
- Awaab's Law and associated social-housing hazard regulations, where applicable; and
- Renters' Rights Act 2025 for SJW private residential tenancies, including provisions commenced from 1 May 2026. The future private rented sector landlord ombudsman will be reflected when membership requirements commence.

16. Related SJW documents

- Complaints process resident leaflet and response templates;
- Repairs, maintenance and emergency response procedures;
- Safeguarding policy and procedures;
- Antisocial Behaviour and Abuse of Staff policy;
- Equality, diversity and reasonable adjustments arrangements;
- Data protection, privacy and records-retention policies;
- Contract management arrangements; and

Annual self-assessment and annual complaints performance and service improvement report.

Sources checked for the 2026 update

Housing Ombudsman: Complaint Handling Code (2024 statutory Code) (accessed 27 August 2026)

Housing Ombudsman: Self-assessment guidance and 2026-27 annual-submission guidance (accessed 27 August 2026)

Housing Ombudsman: Housing Ombudsman Scheme effective 1 October 2026 (accessed 27 August 2026)

Housing Ombudsman: Guidance on Remedies (accessed 27 August 2026)

GOV.UK: Renters' Rights Act 2025 implementation roadmap (accessed 27 August 2026)

GOV.UK: Awaab's Law: guidance for social landlords (accessed 27 August 2026)