St John & St Anne
Housing For Older People
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P27b Complaints Policy

1	Introduction
1.1	This policy applies to St John & St Anne (SJSA), Registered Charity Number 218931, and seeks to ensure that SJSA complaints process is flexible and responsive to the needs of individual residents to enable them to be heard and understood. SJSA complies with the Complaint Handling Code (the **Code**) issued by the Housing Ombudsman Service. All complaints dealt with under this policy will be dealt with in a manner consistent with the Code and SJSA will maintain all records as required by the Code. Where a complaint response is handled by a third party (e.g. a contractor or managing agent) at any stage, it will form part of the two stage complaints process set out in this policy. Residents will not go through two complaints processes. SJSA will ensure that all third parties handle complaints in line with the Code, through scrutiny and oversight within its annual report and self-assessment.
1.2	A complaint is defined as: "an expression of dissatisfaction, however made, about the standard of service, actions, or lack of action by SJSA, its Governors, its own staff, or those acting on its behalf, affecting an individual resident or group of residents.
1.3	The word "complaint" does not need to be used expressly for the matter to be considered a complaint. Whenever a resident express dissatisfaction SJSA will give them the option to make a complaint. Complaints made by residents may be made by the residents' carer, family members or a representative of a resident and these must be handled in line with SJSA complaints policy.
1.4	Complaints can be made to any staff member of SJSA. This can be done in a number of ways which include: • Telephone on 01572 756950 • Letter to Mill House, South Street, Oakham, Rutland, LE15 6HY • Email to Office.manager@stjohnstanne.co.uk or Doreen.woodward@stjohnstanne.co.uk or Executive.assistant@stjohnstanne.co.uk • Face to Face • During the monthly Chief Executive Officer (CEO) drop in session • By private appointment with the CEO or staff team • By using the suggestion boxes provided • By reporting through the I'm Okay tablets • By reporting to the Resident Advisor or any staff member when on site

1.5	A service request is a request from a resident requiring action to be taken to put something right. **Service requests** are not a **complaint**. Service requests should be dealt with in accordance with the Residents' Handbook. Failure to deal appropriately with a service request may lead to the matter being dealt with as a complaint.
1.6	Service requests will be recorded, tracked and monitored to completion
1.7	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. SJSA will not stop our efforts to address the service request if the resident raises a complaint.
1.8	An expression of dissatisfaction with services made through a resident's survey is not defined as a complaint, though wherever possible, the person completing the survey should be made aware of how they can pursue a complaint if they wish to.
1.9	In dealing with complaints SJSA will ensure that: a) individuals who raise a complaint are listened to and treated with courtesy and empathy; b) residents will never be disadvantaged as a result of raising a complaint; c) complaints will be investigated promptly, thoroughly, honestly, and openly; and d) in dealing with complaints SJSA will comply with confidentiality and data protection policies.
2	**Exclusions**
2.1	SJSA must accept a complaint unless there is a valid reason not to do so and will ensure we consider the individual circumstances of each complaint.
2.2	The following matters will not be considered as complaints: a) The issue giving rise to the complaint occurred over twelve months ago. b) Legal proceedings have begun as defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at Court. c) Matters that have previously been considered under the complaints policy.
2.3	Unless excluded on other grounds, SJSA will accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the

	issue. Where there are good reasons to do so, SJSA will also consider whether to apply discretion to accept complaints made outside the time limit.
2.4	If a complaint is not accepted a detailed explanation will be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and their right to take that decision to the Ombudsman (see details below). The Ombudsman may direct SJSA to take on the complaint.
3	**Unreasonable Behaviour** We understand that residents can get upset and frustrated when things have gone wrong. SJSA will always seek to respond to complaints with courtesy, empathy and professionalism, and will not treat behaviour as unreasonable simply because a resident is persistent, unhappy with a decision, or raises matters strongly.
3.1	**Persistent or Vexatious Complainants** SJSA is committed to providing an accessible feedback service to all residents. However, there must be a balance between the residents' right to be heard and their responsibility to behave reasonably in making or pursuing complaints. We therefore reserve the right to restrict or change access on the rare occasion that it is identified that a resident's actions are unacceptable. SJSA staff will respond professionally and sympathetically to all feedback. Where there are occasions when SJSA considers the behaviour or actions of a resident as unacceptable the following guidance will apply. We understand that some circumstances can be upsetting or distressing which can lead to people acting out of character, but where there are persistent unreasonable demands or angry and aggressive behaviours towards our staff, we will need to take the necessary action to manage such behaviour. This may result in a warning to the resident or placing a restriction on how or when the resident can contact us. **Aggressive or abusive behaviour** We understand sometimes residents can feel angry about the circumstances they are having to contact us about; however, it is not acceptable when that anger or aggression is directed at our staff. **Unreasonable demands** If a resident makes what we consider unreasonable demands and as such they impact substantially on our work due to the amount of information they seek or provide, the nature and scale of service they expect, or the regularity or number of approaches they make, we may take the decision to view this as unreasonable. It is persistent behaviour that we may view as unreasonable and not how the resident approaches us. **Examples of these behaviours include the following:** • Making continuous phone calls and sending lengthy emails or

	letters to numerous staff members, often simultaneously • Only willing to communicate with a particular staff member including senior members of staff • Insisting on responses or actions within an unreasonable timescale • Refusing to engage and cooperate with the complaints process • Changing the basis of the complaint as the investigation proceeds and adding trivial or new information at a later date • Raising numerous detailed but unimportant questions, insisting they are all answered • Persistent refusal to accept a decision • Continuing to pursue a complaint case without presenting any new information • Willfully obstructing reasonable attempts to resolve issues raised including deliberate conflation of issues The way in which we manage unreasonable behaviour will depend on the extent and nature. We will look at each case individually and ensure that our decision is fair and proportionate and is fully explained to the resident.
3.2	All complaints will be reviewed on an individual basis.
3.3	If any restrictions are put in place, these will be proportionate and demonstrate regard for the provisions of the Equality Act 2010.
3.4	SJSA will ensure any restrictions will be recorded, monitored and reviewed regularly and the complainant updated following the review.
3.5	Any restrictions in place will not prevent SJSA from ensuring the complaint can be taken through the full complaints process.
4	**Accessibility and Awareness**
4.1	Complaints will be dealt with in a manner that is consistent with SJSA Equality & Diversity Policy and the Charity's duties under the Equality Act 2010.
4.2	If any individual making a complaint wishes SJSA to make reasonable adjustments to accommodate an individual's particular needs, they, or their

	representative, can contact SJSA by phone, email or in person to discuss what adjustments may be possible.
4.3	SJSA acknowledges that a high volume of complaints must not be seen as negative, as this can be indicative of a well-publicised and accessible complaints procedure. Low complaint volumes are potentially a sign that residents are unable to complain.
4.4	The complaints handling policy will be listed in the Residents Handbook and published on the SJSA website. It will also be displayed on notice boards and discussed at the monthly CEO meeting with residents on all sites. SJSA will consider all requests to provide the complaints policy in other accessible formats.
4.5	Residents will have the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting. We will always follow data protection measures when disclosing any information to a third party.
5	**Complaint Handling Staff**
5.1	Complaints will be investigated by the Complaints Officer (Executive Assistant) at Stage One.
5.2	Complaints will be investigated by the Appeals Officer (Chief Executive Officer) at Stage Two
5.3	If the Complaints Officer and/or the Appeals Officer are conflicted, the complaint should be directed to Chair of the Board of Governors. If the complaint relates to the Complaints Officer, the complaint should be directed to the CEO. If the complaint relates to the CEO, then the complaint should be directed to the Chair of the Board of Governors.
5.4	Staff will be suitably trained in the importance of complaint handling.
6	**Complaints Process**
6.1	At each stage of the complaints process, SJSA will: a) deal with complaints on their merits; b) act independently and have an open mind but may consider reports of previous complaints that relate to the same issue being complained about; c) give the resident a fair chance to set out their position;

	d) take measures to address any actual or perceived conflict of interest; (which may include asking another Governor to investigate the complaint); e) consider all relevant information and evidence carefully. f) keep the details of the complaint confidential as far as possible, with information only being disclosed if necessary to properly investigate the matter.
7	**Stage One of the Complaints Process**
7.1	SJSA will acknowledge the complaint and make a record, within 5 working days. The acknowledgement will: a) summarise SJSA's understanding of the complaint (the complaint definition); b) make clear which aspects of the complaint SJSA is, and is not, responsible for and clarify any areas where this is not clear; c) summarise SJSA's understanding of what the Complainant is seeking as an outcome; d) raise any questions that require clarification from the Complainant; and e) set out the next course of action and anticipated timescale.
7.2	SJSA will issue a full response within 10 working days from the complaint being acknowledged. In exceptional cases, if we anticipate that the complaint will take longer to resolve, this will be explained to the resident with a clear timeframe set out for the resolution of the complaint which will not exceed a further 10 working days, without good reason. If any further extensions are required, we will agree with the resident regular intervals to update them on the progress of the complaint. Such explanation will also include the contact details of the Housing Ombudsman.
7.3	A complaint response will be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident.
7.4	We will investigate the complaint in an impartial manner permitting all relevant parties to provide information. The resident and any third parties involved in the complaint should be given the opportunity to set out their position before any final decision is made. We may delegate the management and investigation of the complaint to another individual.
7.5	If the staff member dealing with the complaint is conflicted, or the complaint relates to that staff member, the complaint should be directed to the manager details are in the Residents' Handbook.

7.6	If the complaint involves questions relating to SJSA or the resident's legal obligations, SJSA will set out clearly our understanding of the respective legal obligations and may seek legal advice before doing so.
7.7	If new issues are raised by the resident during the stage one process, these should be dealt with as part of the process if they are relevant. However, if the inclusion of the new issues would unreasonably delay a response, relate to a different issue and/or are raised after the stage 1 response has been issued a new complaint will be logged.
7.8	In responding to the complaint, we will confirm in writing: a) The complaint stage b) The complaint definition c) The decision on the complaint d) The reasons for any decisions made e) The details of any remedy offered to put things right f) Details of any outstanding actions; and g) Details of how to escalate the matter to stage two if the individual is not satisfied with the result.
8	**Stage Two of the Complaint Process**
8.1	If the resident is not satisfied with all or part of the stage 1 response, they can escalate their complaint to stage 2. This can be done in writing by email, via telephone call or in person. The person dealing with the complaint at stage 2 will not be the same person that responded at stage 1.
8.2	The resident does not need to provide reasons for requesting the complaint to be escalated.
8.3	SJSA will acknowledge the complaint at stage 2 within 5 working days of receipt and will a) summarise SJSA's understanding of the complaint (the complaint definition); b) summarise SJSA's understanding of what the resident is seeking as an outcome; c) raise any questions that require clarification from the resident; but acknowledge that reasons do not need to be given for the complaint to be escalated to stage 2;

	d) set out the next course of action and anticipated timescale.
8.4	SJSA will respond in writing to the resident within 20 working days of the stage 2 complaint being acknowledged, informing them of the outcome of the investigation. This will be SJSA's final response.
8.5	If SJSA believes that the appeal will take longer than 20 working days, this will be explained to the resident with a clear timeframe set out for the resolution of the complaint which will not exceed a further 20 working days. If any further extensions are required, we will agree with resident regular intervals to update them on the progress of the complaint. Such explanation will also include the contact details of the Housing Ombudsman.
8.6	A complaint response will be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions will be tracked and actioned promptly with appropriate updates provided to the resident.
8.7	In responding to the stage 2 complaint, we will confirm in writing: a) The complaint stage b) The complaint definition c) The decision on the complaint d) The reasons for any decisions made e) The details of any remedy offered to put things right f) Details of any outstanding actions; and g) Details of how to escalate the matter to the Housing Ombudsman will be provided if the resident is not satisfied with the response.
9	**Putting Things Right Where Something Has Gone Wrong**
9.1	Where something has gone wrong SJSA will acknowledge this and set out the actions it has already taken, or intends to take, to put things right. These can include: • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay;

	• Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures, or practices.
9.2	Any remedy offered must reflect the impact on the resident as a result of any fault identified.
9.3	The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.
9.4	SJSA will take account of the guidance issued by the Housing Ombudsman when deciding on appropriate remedies.
9.5	Any financial award will be reviewed and considered on a case-by-case basis and on its own merits. SJSA will consider if any statutory payments are due in-line with the Housing Ombudsman Code. Also, if any quantifiable losses have been incurred as well as the time and trouble a resident has been put to and any distress and inconvenience caused when awarding compensation. We will record all monetary offers of compensation, including vouchers, service charge and weekly maintenance contribution write-offs etc. Once the compensation figure has been agreed by both parties, we aim to process this within 10 working days.
10	**Scrutiny & Oversight**
10.1	SJSA has a senior lead person who is accountable for our complaint handling. This person will assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.
10.2	A Governor has been appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is known as the Member Responsible for Complaints (MRC).
11	**Policy Review**
11.1	This policy will be reviewed on an annual basis and will be approved by the Board of Governors.
11.2	SJSA will carry out an annual self-assessment in accordance with the Code.
11.3	The Board of Governors will consider any findings or recommendations of the annual self-assessment and the annual complaints performance and service improvement report.
12	**For the Purposes of this Policy**
12.1	Contact for Stage 1: Name: Wendy Legard, Executive Assistant

	Telephone number: 01572 756950 Address: Mill House, South Street, Oakham, Rutland, LE15 6HY Email address: Executive.assistant@stjohnstanne.co.uk
12.2	Contact for Stage 2: Name: Doreen Woodward, Chief Executive Officer Telephone number: 01572 756950 Address: Mill House, South Street, Oakham, Rutland, LE15 6HY Email address: Doreen.woodward@stjohnstanne.co.uk
13	**Housing Ombudsman Service**
	The contact details for the Housing Ombudsman Service are: Telephone: 0300 111 3000 Website: https://www.housing-ombudsman.org.uk/contact-us/ Address: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
	Policy Approved: October 2026 **Next Review:** October 2027