

COMMUNITY HOUSING ADVOCACY PROJECT (CHAP)

Complaints Handling Procedure

For

FCA Regulated Activities (Debt Counselling Services)

(FCA DISP Compliant)

1. Purpose

This procedure ensures that all complaints received by **Community Housing Advocacy Project (CHAP) Scottish Company Limited by Guarantee (Company No. SC213344)** and Registered Scottish Charity (Charity No. SCO28100) in respect of FCA regulated activities are handled fairly, consistently, and promptly in accordance with the FCA's DISP rules. Complaints in respect of any other activity undertaken by CHAP will be subject to CHAP's General Complaints Procedure.

2. Definition of a Complaint

A complaint in respect of FCA regulated activities is:

Any oral or written expression of dissatisfaction from, or on behalf of, an eligible complainant about the provision of, or failure to provide, a financial service, which alleges financial loss, material distress, or material inconvenience.

3. Eligible Complainants

Complaints will be handled under DISP if received from:

- Retail clients
- Small businesses (fewer than 50 employees and turnover < £6.5m)
- Micro-enterprises
- Certain charities and trusts

4. How Complaints Can Be Made

Complaints may be received via:

- Telephone
- Email
- Letter
- In person
- Any other communication channel

All staff are trained to identify complaints, even if not explicitly labelled as such.

5. Complaint Handling Process

5.1 Acknowledgement

- Complaints must be acknowledged **promptly**.
- If not resolved within **3 business days**, a written acknowledgement must be sent.

5.2 Informal Resolution (≤ 3 Business Days)

If the complaint is resolved by close of the **third business day**:

- Send a **Summary Resolution Communication**, including:
 - Outcome of the complaint
 - Confirmation the complainant can refer to the Financial Ombudsman Service (FOS)
 - FOS contact details

5.3 Investigation

If not resolved within 3 business days:

- Assign to a competent, impartial investigator who may be a member of CHAP's Board of Directors/Trustees.
- Gather all relevant evidence
- Assess fairly, consistently, and promptly

5.4 Ongoing Communication

- Keep the complainant informed of progress
- If unable to issue a final response within 4 weeks, send a **holding response** explaining:
 - Reason for delay
 - Expected timeframe

6. Final Response Deadline

A **Final Response** must be issued within **8 weeks** of receiving the complaint.

The Final Response must include:

- Whether the complaint is upheld or rejected
- Clear reasoning
- Details of any redress or remedial action
- Information about the right to refer to the FOS
- A copy of the FOS standard explanatory leaflet

7. If 8 Weeks Deadline Is Missed

If a final response cannot be issued within 8 weeks:

- Send a written response explaining:
 - Why the delay has occurred
 - When a final response is expected
 - The complainant's right to refer to FOS immediately

8. Financial Ombudsman Service (FOS)

Complainants must be informed they can refer their complaint to:

- Financial Ombudsman Service

Time limits for referral:

Complainants must be informed that:

- That complaints must be referred to FOS within **6 months** which starts to run on the date of the final response letter and not on the date on which the complainant receives the final response letter, and
- If the complaint is not referred to FOS within this six-month period, the FOS will not normally have CHAP's consent to consider the complaint out of time and CHAP will not permit the FOS to deal with it out of time.

9. Complaint Outcomes and Redress

Where a complaint is upheld, the firm will:

- Offer appropriate redress (financial or non-financial)
- Take remedial action to prevent recurrence

10. Record Keeping

TCHAP will:

- Maintain records of all complaints for **at least 3 years**
- Include:
 - Complaint details
 - Actions taken
 - Outcome
 - Whether reported to the FCA

11. Complaints Reporting (FCA Reporting)

CHAP must submit complaints data to the FCA:

- **Biannually or quarterly**, depending on firm size
- Via the FCA's RegData system

12. Root Cause Analysis

CHAP will:

- Identify systemic issues
- Address root causes
- Implement controls to prevent recurrence

13. Governance and Oversight

- A designated **Complaints Officer** will oversee compliance
- Senior management will receive regular MI on:
 - Complaint volumes
 - Root causes
 - Outcomes
 - FOS referrals

14. Training

All relevant staff must:

- Receive regular training on complaint identification and handling
- Understand DISP requirements

15. Accessibility

This procedure will be:

- Available to all staff
- Provided to customers upon request
- Accessible to vulnerable customers

16. Vulnerable Customers

Extra care will be taken to:

- Identify vulnerability
- Adapt communication methods
- Ensure fair outcomes

17. Continuous Improvement

The firm will:

- Regularly review complaint trends
- Update procedures in line with FCA changes
- Benchmark against best practice