# Customer Complaints & Feedback Policy

| | |
|---|---|
| **Policy Owner:** | Director of Customers & Communities |
| **Policy No:** | CHI-POL-048 |
| **Version No:** | 006 |
| **Approval by:** | • EMT<br>• GMT<br>• CEC<br>• Group Board |
| **Date of Approval:** | September 2026 |
| **Next Review Date:** | September 2027 |

| Version | Date of Changes | Changes made |
|---|---|---|
| 001 | 01/04/2024 | New Policy |
| 002 | 14/07/2025 | Moved onto new policy template<br>Introduced document number and version control |
| 003 | 21/07/2025 | Content updated |
| 004 | 05/01/2026 | Content Updated |
| 005 | 28/04/2026 | Updated policy for merged organisation following a review of previous entity policies |
| 006 | 29/09/2026 | Updated policy following review of processes for Chime with legacy organisation teams and inclusion of STAIRs. |

## Table of Contents


1. Policy Objective ..... 3
2. Legislative & Regulatory Requirements ..... 3
3. Scope & Definitions ..... 4
4. Reporting Feedback ..... 5
5. Our Complaints Procedure ..... 7
   5.1 Stage 1 - Initial Investigation ..... 7
   5.2 Stage 2 – Escalation ..... 8
   5.3 Requests and reviews under STAIRs ..... 9
6. External Complaints Procedure ..... 9
7. Persistent/Unreasonable Behaviour ..... 11
8. Reporting and learning ..... 12
9. Appendices ..... 12
10. Related Documents ..... 12

## 1. Policy Objective

(Watford Community Housing Trust, trading as Chime Housing will hereafter be referred to as "Chime Housing".)

We want to provide the best possible service to our customers, and this Policy sets out how we deal with and value the feedback our customers give us.

We value all feedback about our services, whether it's a compliment, a complaint or just an observation. We record all feedback and use it to continually improve our services. Residents will never be treated differently for bringing forward complaints.

There will be times when things don't go as well as we, or our customers, would like and when that happens, we need to know about it so we can take steps to resolve the problem promptly and restore the customer's confidence whilst learning from what went wrong. We also welcome positive feedback, which will be shared with the staff member concerned and used to build on good practice.

We take personal responsibility for complaints at the time they're first reported and work with customers to put things right quickly and fairly.

## 2. Legislative & Regulatory Requirements

The Regulator of Social Housing (RSH) Transparency, Influence and Accountability Standard (2024) states that, "registered providers must ensure complaints are addressed fairly, effectively, and promptly".

**Transparency, Influence and Accountability Standard (2024)**

2.5 Complaints

2.5.1 Registered providers must ensure their approach to handling complaints is simple, accessible and publicised.

2.5.2 Registered providers must provide accessible information to tenants about:

a. how tenants can make a complaint about their registered provider
b. the registered provider's complaints policy and complaints handling process
c. what tenants can do if they are dissatisfied with the outcome of a complaint or how a complaint was handled
d. the type of complaints received and how they have learnt from complaints to continuously improve services.

The Social Housing (Regulation) Act 2023 (the Act) empowered the Housing Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints. It also placed a duty on the Ombudsman to monitor compliance with a code of practice that it has issued. This Policy accords with guidance from the Housing Ombudsman's "Complaint Handling Code", the Financial Ombudsman Service's complaints handling requirements, the 2010 Equality Act, the Energy Ombudsman and the Localism Act 2011 (as amended).

## 3. Scope & Definitions

### Scope

This Policy applies to the Chime Housing Group, including its subsidiary and joint venture companies. This Policy covers all our customers and anyone else receiving a service from Chime Housing. We welcome and listen to all feedback about our services whether provided by our customers or other parties / individuals.

Requests for information under the Social Tenant Access to Information Requirements (STAIRS), and any subsequent complaints about their handling or outcome, will be considered under a separate STAIRS process. Once that review is complete, customers who remain dissatisfied may refer the matter directly to the Housing Ombudsman.

The Housing Ombudsman Scheme generally allows complaints from current and former tenants and other occupiers, including shared owners and leaseholders, applicants for housing, and their authorised representative. Where we receive a complaint (as defined at section 3 below) from someone who is not eligible under the Housing Ombudsman Scheme, we have discretion as to whether to accept the complaint. This is considered at Stage 1 of the Procedure (see section 5 below) taking account of the subject matter and the issue's relevance to us whilst informing the complainant accordingly.

We have a separate Compensation & Remedies Policy which sets out the circumstances where our customers are entitled to financial compensation for a failure by us to deliver a chargeable service, or where a tenant suffers damage/loss due to our actions or omissions. This does not extend to damage/loss which would fall under a home contents insurance policy or matters beyond our control.

### Definitions

**Compliment:** A positive comment or observation about our service, activities, processes, or a member of staff.

**Complaint:** 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. Our customers do not have to use the word "complaint" for us to recognise an expression of dissatisfaction, and we will always give our customers the choice to make a complaint.

**Service request:** A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.

**Customer Representative:** refers to a person who represents the customer raising the complaint throughout the complaint process. Customers can have a representative deal with their complaint on their behalf.

**Customer Complaints Panel Representative:** refers to an impartial representative selected from our Tenant Panel who may carry out a review of a complaint working with a member of our team.

**Member Responsible for Complaints (MRC):** A member of our Board who provides oversight and assurance of our complaint handling and compliance with the Housing Ombudsman's Complaint Handling Code.

## 4. Reporting Feedback

All feedback we receive is valuable. It can help shape our services and the future direction of the organisation positively.

Customers can give us feedback in any of the following ways:

| | |
|---|---|
| **In person:** | To any member of our staff, including at our reception in Gateway House. |
| **Digital Service:** | Via www.ChimeHousing.org.uk |
| **By telephone:** | For former Watford Community Housing complaints, 0800 218 2247<br>For former Thrive Homes complaints, 0800 917 6077 |
| **Online:** | Via our website: www.ChimeHousing.org.uk/contact-feedback; or through our social media platforms, Facebook and Instagram |
| **By email:** | For former Watford Community Housing complaints, feedback@wcht.org.uk<br>For former Thrive Homes complaints, complaints@thrivehomes.org.uk |
| **In writing to:** | Chime Housing, Gateway House, 59 Clarendon Road, Watford WD17 1LA |

Customers can request for reasonable adjustments when providing feedback to us. Chime Housing will accommodate all requests so far as possible in accordance with the Equality Act 2010 and our Translation & Interpretation Policy. We want to ensure that all customers receive equitable outcomes. Where customers are considered vulnerable, they will be treated in accordance with our Vulnerable Customers Policy.

Our complaints policy is available in accessible formats including large font, braille and various languages, and we offer advocacy services for customers who require support throughout the complaints process. We are also happy to conduct home visits to explain our policy in person.

Customers can also provide feedback through a third party such as an MP or Local Councillor who will be able to handle the complaint on behalf of the customer. In these cases, the customer must provide their express permission through the relevant process. Customers may be accompanied to any meeting with the landlord.

We encourage customers making a complaint to outline what they feel would be a satisfactory resolution to the problem at the outset so that everyone's clear about expectations. We will work with the customer to understand the individual circumstances of their complaint.

Customers have the choice to leave feedback anonymously; however, we will not be able to respond or provide any update if this is the case.

We categorise customer feedback in three ways, which are defined in section 3:

a. Service requests
b. Complaints
c. Compliments

## Compliments

Compliments are valuable pieces of feedback for us; we record and report on them. Individual compliments are fed back to the staff member and their line manager.

## Complaints

The Housing Ombudsman Service's definition of a complaint generally refers to situations where we have fallen below our core Service Standards.

Where a customer expresses dissatisfaction, we will offer them the opportunity to make a complaint. If they confirm that they do not wish to use the complaints process and only want us to take action to put the matter right, we will record and manage this as a service request. If a complaint has already been logged, it will only be withdrawn at the customer's request.

Examples of a complaint could include:

- Failure to provide a service in accordance with our policies or Service Standards
- Unacceptable quality of work or service
- Delays in responding to an enquiry, in providing a service or completing work
- A failure to provide information or providing the wrong information
- Unacceptable behaviour or attitude of a staff member or contractor
- A complaint about unfairness e.g. of a policy or procedure
- Inaccurate or unclear heat-network bills or charges
- Unexplained changes to heat-network charges or payment amounts.

What is not a complaint?

- A first request for a service (e.g. a repair or request to log antisocial behaviour) or general follow-up enquiries about the status of that request
- When legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court
- External appeals process e.g. First Tier Tribunal
- A report of crime or anti-social behaviour about a neighbour (we have a separate Anti-Social Behaviour Policy & Procedure to deal with this) although dissatisfaction with our handling of an ASB case could be considered a complaint
- Requests for information under the Social Tenant Access to Information Requirements (STAIRS).
- Dissatisfaction with legal or legislative requirements (which we are not responsible for) e.g., local authority nominations processes
- A matter which is already being dealt with under our internal Complaints Procedure (section 5) or the External Complaints Procedure (section 6)

- A complaint raised more than 12 months after the issue occurred or the customer became aware of it will not normally be considered through our complaint's procedure. However, we will consider the individual circumstances and may accept it where there are good reasons to do so.
- An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey will be made aware of how they can pursue a complaint if they wish to.
- If a matter reported to Chime Housing is not accepted as a complaint, an explanation will be provided to the resident setting out the reasons why the matter is not suitable for the complaints process. It should also outline their right to take that decision to the Ombudsman. The customer will be informed of this decision through a Stage 1 complaint decline letter within five working days.

### Service Requests

Customers may submit a service request where they require us to take action to put something right. We will record the request on our housing management system and respond within five working days. If the customer expresses dissatisfaction with our response to, or handling of, their service request, they will be given the choice to make a complaint. We will continue working to resolve the service request even where a complaint has been raised. We will always strive to resolve issues as soon as possible whether this is part of a service request or a complaint.

## 5. Our Complaints Procedure

This section explains our two-stage complaint procedure. Requests and reviews relating to information covered by the Social Tenant Access to Information Requirements (STAIRs) follow a separate process.

Customers may use artificial intelligence or other tools to help them make a complaint. This will not affect how their complaint is considered. Where a complaint is particularly lengthy, repetitive, unclear or contains information that may be inaccurate or not directly relevant, we may ask the customer to summarise or clarify the key issues, the impact on them and the outcome they are seeking. We will not delay logging the complaint while seeking this clarification and will provide reasonable support where needed.

Chime Housing may use approved digital tools, including artificial intelligence, to support complaint handling. These tools will not replace human judgement. A suitably trained colleague will remain responsible for checking accuracy, reviewing the evidence, making decisions and approving complaint responses.

### 5.1 Stage 1 - Initial Investigation

We aim to resolve most complaints at Stage 1. We will acknowledge and log the complaint within five working days of its receipt. Where we hold a complainant's email address, we will generally send the acknowledgement by email unless the customer asks us to use another method. Within our acknowledgement letter we will set out our understanding of the complaint and be clear which aspects of the complaint we are and are not responsible for and clarify any areas where the complaint is not clear. If known, we will confirm the outcome(s) the customer is seeking within the acknowledgement letter.

A Chime Housing team manager or team leader will carry out the initial investigations alongside an officer in the complaints team. We will respond to the complaint within a maximum of ten working days, starting from the date the complaint was first acknowledged.

If the problem has been resolved within this timescale, the complaint can be closed. If there are outstanding actions, such as repair work, we will continue to track these after the Stage 1 response has been issued and provide the customer with timely updates. If a customer raises additional related issues before the Stage 1 response is issued, we will include them in our investigation. Where this affects our ability to respond within the original timescale, we will explain this and, where necessary, extend the response timescale in line with the Complaint Handling Code. Unrelated issues, or new issues raised after the Stage 1 response has been issued, may be logged as a new complaint to avoid unreasonable delay.

Where there is good reason, such as needing further information to complete a complex investigation, we may extend the Stage 1 timescale by up to 10 working days. Customers may also request an extension, for example, if they are going on holiday. We will confirm any extension in writing, explain the reason, provide the revised response date and include the Housing Ombudsman's contact details. Any extension beyond a further 10 working days will only be made where there is good reason.

Customers are entitled to request for a customer representative to deal with the complaint on their behalf.

### 5.2 Stage 2 – Escalation

Customers can request escalation to Stage 2 if they remain dissatisfied with all or part of the Stage 1 response. They will not be required to explain their reasons for requesting escalation, although we will make reasonable efforts to understand why they remain dissatisfied.

We will acknowledge, define and log the Stage 2 complaint within five working days of receiving the escalation request. Our acknowledgement will set out our understanding of the complaint and the outcomes the customer is seeking. We will clarify any areas that are unclear and confirm which aspects of the complaint we are, and are not, responsible for.

We will not refuse to escalate a complaint through all stages of the procedure unless there is a valid reason to do so. We reserve the right not to accept an escalation under section 2 of the Complaint handling Code or where:

- legal proceedings have started since the Stage 1 response was issued. Legal proceedings are defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court; or
- the matter has already completed all stages of our complaints procedure and no new matters have been raised.

Unrelated new matters may be logged separately as a new Stage 1 complaint rather than included within the Stage 2 consideration.

Each request will be considered on its individual merits and in accordance with section 2 of the Complaint Handling Code. If we refuse to escalate a complaint, we will explain our reasons in writing and advise the customer of their right to refer our decision to the Housing Ombudsman.

Stage 2 complaints will be investigated by a Chime Housing manager who was not involved in considering the complaint at Stage 1, supported by a Complaints Officer. The manager will normally be more senior than the Stage 1 investigating manager. A Customer Complaints Panel Representative may also be involved in selected cases, either as part of Chime Housing's review process or at the customer's request.

We will issue a response within 20 working days of the date of acknowledgement. In some circumstances, we may extend the Stage 2 response timescale by up to 20 working days – for example, if it is a complex matter and we require further information. Customers may also request an extension, for example, if they are going on holiday. We will confirm any extension in writing, explain the reason, provide the revised response date and include the Housing Ombudsman's contact details. Any extension beyond a further 20 working days will only be made where there is good reason.

Where a response will fall outside these timescales, we will agree suitable intervals for providing updates with the customer. We will issue the Stage 2 response when the answers are known rather than waiting for all outstanding actions to be completed. We will continue to track outstanding actions and provide timely updates.
We will generally communicate with the customer by email unless they ask us to use another method. If the customer is satisfied with the outcome of the Stage 2 complaint, we will agree with them that the case can be closed.

Our stage 2 response represents the end of our internal complaints handling procedure. Complainants who remain dissatisfied can pursue their complaint externally, the Procedure for which is detailed further below at section 6.

### 5.3 Requests and reviews under STAIRs

The Social Tenant Access to Information Requirements (STAIRs) are government requirements that give social housing tenants and shared owners of private registered providers, such as housing associations, the right to access information about how their social housing is managed.

Tenants can ask us to review information we are required to publish if they believe it is missing, unclear or inaccessible. From 1 April 2027, tenants can also request specific information from us. We will normally respond to these requests within 30 calendar days.

If a tenant is dissatisfied with published information or our response to an information request, they can ask us to carry out a review. We will acknowledge the review request and normally respond within 30 calendar days. If they remain dissatisfied, they may refer the matter directly to the Housing Ombudsman.

STAIRs reviews are separate from our Stage 1 and Stage 2 complaints procedure.

## 6. External Complaints Procedure

The Housing Ombudsman Scheme is approved by the Secretary of State under section 51 of, and Schedule 2 to, the Housing Act 1996 as amended by the Localism Act 2011, the Building Safety Act 2022, and the Social Housing (Regulation) Act 2023 (the Act).

The Act requires social landlords, as defined by section 51(2) of the Act, to be members of an approved scheme. The Act 2023 (the Act) empowered the Housing Ombudsman to issue a code of practice about the procedures members of the Scheme should have in place for considering complaints.

The purpose of the Housing Ombudsman Scheme is to enable tenants and other individuals to have complaints about members investigated by a Housing Ombudsman. The role of the Ombudsman is to resolve disputes involving members of the Scheme, including making awards of compensation or other remedies when appropriate, as well as to support effective landlord and tenant dispute resolution by others.

The statutory Complaint Handling Code came into effect on 1 April 2024 and sits alongside the Housing Ombudsman Scheme. From 1st October 2022 customers were no longer required to wait for 8 weeks before taking any complaint to this service. The Ombudsman discuss any contact from customers with Chime Housing but will not normally consider a complaint until all stages of our Complaints Procedure have been completed.

We will comply with any orders made by the Housing Ombudsman and carefully consider any recommendations.

The Housing Ombudsman can provide free, independent, and impartial assistance throughout the life of a complaint. Customers who are eligible under the Housing Ombudsman Scheme can access the Housing Ombudsman Service by calling 0300 111 3000 or by filling in the online complaint form https://www.housing-ombudsman.org.uk/online-complaint-form/. For more information, customers can visit their website at https://www.housing-ombudsman.org.uk/.

### Building Safety Complaints

Customers have the right to raise a complaint about safety concerns in any building. Customers living in a high-rise building of at least seven storeys or 18 metres in height may also complain to the Building Safety Regulator if they are dissatisfied with our response. Feedback can be reported as per section 4.0 and will follow our Complaint Procedure set out in section 5.

A Relevant Complaint is a complaint relating to a building safety risk as regards a high-rise building, or the performance by an accountable person for the building of any duty under the Building Safety Act 2022.

Building safety risks include structural failure and the spread of fire. For example::

- Fire doors or smoke extraction which are not working or missing that may increase the risk of fire spread
- Failure of the building's structure, such as parts of the building collapsing, cracks, or parts of the building falling off.

Customers can also raise concerns about Chime Housing's performance as an accountable person or principal accountable person. For example:

- Our communications to residents
- Our responses to raised concerns

Customers who remain dissatisfied with our complaint response can contact the Building Safety Regulator using the following details:

**Internet** - https://www.gov.uk/guidance/contact-the-building-safety-regulator and complete the on-line form.

**Telephone** - 0300 790 6787 - (Monday to Friday, 8:30am to 5pm, except on Wednesdays when they are open from 10am to 5pm)

If a complainant is dissatisfied with our handling of the complaint itself, they may also refer the matter to the Housing Ombudsman

### Financial Ombudsman Service (FOS)

Where a complaint falls within the remit of the FOS, such as a consumer credit matter, the customer can refer it to the FOS if it remains unresolved eight weeks after it was first received.

When concluding on this type of complaint under our Complaints Procedure, we will advise the customer that they can refer the matter to the FOS within six months of our final response. We will provide the FOS's website and contact details, together with a copy of its 'Your Complaint and the Ombudsman' leaflet. We will also confirm whether we consent to the FOS considering the matter outside the six-month time limit.

### Energy Ombudsman (EO)

Customers can refer complaints about a heat-network service, such as metering, billing or the provision of heating or hot water, to the Energy Ombudsman free of charge after receiving our final Stage 2 response or if the matter remains unresolved eight weeks after it was first raised.

Customers should approach only one Ombudsman initially. We will advise whether the Energy Ombudsman or Housing Ombudsman is most appropriate. If necessary, the Ombudsmen will refer the matter between them so the customer does not need to start again.

**Website:** www.energyombudsman.org
**Telephone:** 0330 440 1624, Monday to Friday, 8am–6pm
**Email:** enquiry@energyombudsman.org
**Post:** Energy Ombudsman, PO Box 966, Warrington WA4 9DF

## 7. Persistent/Unreasonable Behaviour

We maintain a Cautionary Use Database to record instances where contact with individual customers has had to be limited or prevented due to persistent or unreasonable behaviour. Notes are also kept on our systems to limit contact where we need to do so to protect staff from abuse.

The Housing Ombudsman has its own guidance on what constitutes unacceptable behaviour which we follow, and which is reflected in our Persistent & Unreasonable Behaviour Policy.

This policy sets our approach to the few customers whose actions or behaviour we consider unacceptable. We take the safety and wellbeing of our staff and customers very seriously, and we have a zero-tolerance approach to abusive behaviour.

Persistent/unreasonable behaviour may result in restricted contact, and the use or threat of physical violence will be reported to the police in appropriate circumstances. Our Housing team may also invoke legal action against a tenancy/lease.

## 8. Reporting and learning

We monitor complaint-handling performance, including the volume, categories and outcomes of complaints, and issues, trends and learning arising from them.

This information is shared regularly with our Member Responsible for Complaints and reported quarterly to the Customer Experience Committee, Gateway Membership Team and our Board. Updates include the outcomes of Housing Ombudsman investigations and progress in complying with any orders relating to severe maladministration findings.

Each year, Chime produces an Annual Complaints Performance and Service Improvement Report for scrutiny and challenge by our Board. The report is published on our website alongside the Board's response and includes:

**a)** self-assessment against the Code;
**b)** qualitative and quantitative analysis of our complaint-handling performance, including a summary of complaints we have refused to accept;
**c)** any findings of non-compliance with the Code by the Ombudsman;
**d)** service improvements made as a result of learning from complaints;
**e)** any annual report about our performance from the Ombudsman; and
**f)** any other relevant reports or publications produced by the Ombudsman in relation to the work of Chime.

We also publish our performance under the Tenant Satisfaction Measures, including in our Annual Report for Tenants each year.

## 9. Appendices

- Complaint Handling Code Self-Assessment Chime Housing

## 10. Related Documents

- MRI Feedback Module User Guide
- Service Standards
- The Thrive Deal
- Corporate Social Media Policy & Procedure
- Compensation and Remedies Policy
- Data Protection Policy
- Customer Complaint (Appeal) Procedure
- Translation and Interpretation Policy
- Vulnerable Customers Policy
- Persistent or Unreasonable Behaviour Policy