Complaint Handling Procedure

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1. Purpose

The purpose of this procedure is to:

- provide Workers with the framework for the processing and resolution of complaints in a timely, efficient and standardised manner,
- provide Workers with a framework for processing reviews on decisions,
- ensure procedural fairness in the management of complaints and review of decisions,
- identify how HOME in PLACE track the number and type of complaints received,
- show how we use complaints to learn what we need to do to improve our work and help prevent the recurrence of similar complaint issues through the continuous improvement of HOME in PLACE’ services.

HOME in PLACE management of complaints including the gathering of information related to complaints and the way in which we store and log such data are important requirements in meeting our standards under HOME in PLACE Client Service Charter and our responsibilities under HOME in PLACE policies.

HOME in PLACE is committed to providing fair and just review of its services and decisions to tenants, applicants, residents, families, carers, Partners, Workers and other Stakeholders. By ensuring that complaints are addressed effectively, promptly and fairly.

HOME in PLACE Complaints Management Procedure outlines how we manage, record and resolve complaints.

2. Scope

This procedure is intended to apply to any complaint, regardless of who makes it with the following exceptions which have separate procedures:

- Neighbourhood disputes and difficulties, including accusations of anti-social behaviour, are covered by HOME in PLACE Anti-Social Behaviour Policy (POL-025-03), HOME in PLACE Dealing with Anti-Social Behaviour Procedure (PROC-025-03), HOME in PLACE Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Policy (POL-025-34) and HOME in PLACE Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Procedures (PROC-025-34).
- Complaints and grievances by HOME in PLACE’ Workers against other HOME in PLACE Workers are dealt with in HOME in PLACE Workplace Relations Policy Manual Complaints and Grievance Policy (POL-028-06).
- Complaints involving allegations of fraud, corruption, misconduct and financial wrongdoing are managed in accordance with HOME in PLACE Fraud and Corruption Policy (POL-005-04), HOME in PLACE Financial Wrongdoing Policy (POL-005-06) and HOME in PLACE Investigation Procedures (PROC-033).
- Complaints received from the Registrar for Community Housing are managed in accordance with HOME in PLACE Registrar for Community Housing Complaints Procedure (PROC-012-04) and recorded in Tickit HOME in PLACE online system for compliance, incident and risk management.
- Appeals about decisions made by HOME in PLACE are dealt with in HOME in PLACE Internal Review and Appeal Policy and Procedure (POL-001).
Anonymous complaints can be lodged, recorded and investigated, but obviously our ability to investigate and act on them may be limited because of this.

The process for handling child complaints may be generally managed in accordance with this procedure however refer to HOME in PLACE Child Safeguarding Policy (POL-003-02), HOME in PLACE Child Friendly Complaint Handling Guidelines (PROC-012-02) and HOME in PLACE Child Abuse Reporting Procedure (PROC-012-04) for additional requirements for managing child complaints.

The process for handling complaints from people with disability, families, carers, service providers may be generally managed in accordance with this procedure however refer to HOME in PLACE Safeguarding People with A Disability Policy (POL-003-03) and HOME in PLACE Safeguarding People with A Disability Complaint Handling Guidelines (PROC-012-03) for additional requirements for managing child complaints.

Context

Complaint
A complaint is where a tenant, applicant, resident, Partner, member of the community or other stakeholder expresses dissatisfaction with an area of service delivery, over which HOME in PLACE has direct control.

A complaint may be made by a person to whom we deliver services or who is affected by our services which relates to our Workers, Partners, Associates and anyone else acting on behalf of a member of the HOME in PLACE Group.

Neighbourhood Disputes and Anti-Social Behaviour
This procedure does not apply to areas that HOME in PLACE does not have direct control over, including but not restricted to:
- Neighbour disputes
- Accusations of disruptive behaviour
- Reports of criminal behaviour
- Noise and nuisance
- Domestic violence

Refer to HOME in PLACE Anti-Social Behaviour Policy (POL-025-03) and HOME in PLACE Dealing with Anti-Social Behaviour Procedure (PROC-025-03) for information about managing anti-social behaviour. Refer to HOME in PLACE Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Policy (POL-025-34) and HOME in PLACE Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Procedures (PROC-025-34).

Ministerial Complaint
Complaints which are made directly to HOME in PLACE by way of Ministerial correspondence or contact are dealt with in the same way as other complaints covered by these procedures. However, these complaints are responded to and appropriately actioned within 24 hours from the time a request for information by the Minister is received by HOME in PLACE. A ministerial complaint would be received, acknowledged and recorded in Greentree using a Complaint Service Request / Problem Code: LocalMP.
Registrar for Community Housing Complaint
From time to time the Registrar may receive complaints and allegations relating to dissatisfaction with HOME in PLACE compliance with the Community Housing Providers National Law and National Regulatory Code.

These complaints are acknowledged, investigated and responded to by the Executive Manager Registration and Compliance as delegated by the Group Managing Director. When a complaint from the Registrar is received it is lodged in Tickit HOME in PLACE online system for compliance, incident and risk management.

Refer to HOME in PLACE Registrar for Community Housing Complaints Handling Procedure (PROC-012-05).

Privacy Complaint
A person may make a complaint if they feel their personal information has been handled inappropriately by HOME in PLACE, refer HOME in PLACE Privacy Policy (POL-019). Privacy complaints are managed in accordance with HOME in PLACE Complaints Management and this procedure. If a complainant is not satisfied with HOME in PLACE response or the way HOME in PLACE has dealt with the complaint, the individual may make a formal written complaint to the Office of the Australian Information Commissioner (OAIC).

Where there has been a notifiable data breach an incident report will be lodged via Tickit HOME in PLACE online compliance, incident and risk management system in accordance with HOME in PLACE Privacy or Notifiable Data Breach Procedure (PROC-019-01).

Complaints including allegations of fraud, corruption or misconduct
The Group Chief Legal Officer is appointed as the HOME in PLACE Fraud Officer.

Complaints including allegations of fraud, corruption or misconduct are required to be lodged via an incident form in Tickit and referred to the Group Chief Legal Officer for triage and action in accordance with HOME in PLACE Fraud and Corruption Policy (POL-005-04), Investigation Procedures (PROC-033). The person responsible for managing the complaint is responsible for lodging the incident form.

If the complaint is from an Eligible Whistleblower refer to HOME in PLACE Whistleblower Policy (POL-005-03) for whistleblower protections and provisions that apply to the complaint investigation.

Complaint regarding breach of ACFID Code of Conduct
HOME in PLACE is committed to adhering to the ACFID Code of Conduct. If a person has reasonable grounds to believe there has been a breach of the Code, they may make a complaint about to ACFID. Complaints against a member may be initiated by any member of the public, other ACFID members, and any other body. The independent Code of Conduct Committee (the Committee) is responsible for investigating complaints. The process through which complaints are investigated and findings determined is outlined in ACFID Code of Conduct Complaints Handling. Click on the following link for further information https://acfid.asn.au/content/complaints.
Contact for complaints

Any person in Australia or from countries where work is being conducted by HOME in PLACE representative, may raise concerns or complaints about HOME in PLACE discretely and confidentially.

Complaints about HOME in PLACE workers, associates and partners carrying out business on behalf of HOME in PLACE should be marked confidential and can be made by email to the Complaints and Customer Service Officer, complimentsandcomplaints@homeinplace.org, or posted to HOME in PLACE Complaints and Customer Service Officer, P O Box 976, Hamilton NSW 2303. The complainant will receive an acknowledgement letter. If you have any queries or would like information about your complaint progress or HOME in PLACE complaints process may contact HOME in PLACE by telephone on 1300 333 733 and request to speak to the HOME in PLACE Complaints and Customer Service Officer.

3. Procedure

HOME in PLACE is committed to tenants’, applicants’, members of the community or other stakeholders’ rights and will provide an effective complaints procedure that benefits the tenant, applicant, member of the community or other stakeholder and HOME in PLACE in the long term, by providing a process for feedback and review that informs effective decision making for service improvement. HOME in PLACE has written documentation that demonstrates a clear commitment to:

- the rights of tenants to respectful, fair and non-discriminatory treatment
- the provision of safe and secure housing
- privacy
- protecting personal information, and
- providing access to complaints and appeals processes

The following information outlines the procedure to guide HOME in PLACE Worker’s in managing a complaint.

There are five phases involved in managing a complaint:

1. Receive and Document / Record
2. Assess and Prioritise
3. Investigate and Action
4. Outcomes and System Improvement
5. Monitoring Effectiveness and Reporting

1. Receive and Document / Record

The primary function of receiving and documenting / recording a complaint is to ensure that the complainant receives acknowledgement that their complaint is being addressed and it is recorded in Greentree for further action.

Greentree is the primary tool for the electronic collection of data in relation to complaints. Employees are required to record complaint details within Greentree in accordance with the Greentree Procedures Manual – Complaint Service Requests. The record created is a Complaint Service Request (SR).
Available mediums to lodge a complaint: A complaint can be lodged with HOME in PLACE via any mode of communication, such as in person, telephone, writing, fax, email or via the website. If the complainant requires assistance to lodge a complaint, every possible effort should be made to organise an interpreter, translator, advocate or support service to assist.

Receiving a complaint: When receiving a complaint, it is important that the complainant feels heard and their complaint is acknowledged and not trivialised. Effective management of a complaint in the initial stages may prevent a complaint escalating.

Acknowledging a complaint: Should a complaint be received via writing, fax, email or website, the complainant should be contacted, and their complaint acknowledged in writing (when there is an address provided). Should the complaint be received in person or over the phone, immediate acknowledgement will be provided. The complaint will be lodged and documented in Greentree and a receipt number will be generated. This number is to be issued as an acknowledgement and to reassure the complainant that investigation and appropriate action will be taken.

Documenting a complaint: All complaints are to be documented in HOME in PLACE’s Greentree system via a Service Request. It is important to inform the complainant that information will be recorded and documented so the complaint can be dealt with in the most effective way.

Privacy and personal information: When collecting personal information, an employee must provide the Privacy Notice to the complainant and any other person that may be requested to provide personal information while investigating the complaint. The privacy notice must be given to the complainant if practicable, before the collection of the personal information, or as soon as practicable after the collection. Complainants may access, change or update any personal information HOME in PLACE holds about them, subject to the Privacy Act 1988 (Cth).

Confidentiality: Confidentiality will always be respected and maintained within the constraints of the need to fully investigate a complaint, subject to any legal authorisation or requirements for disclosure and consistent with the principles of natural justice.

HOME in PLACE will accept anonymous complaints and investigate these as practically possible. They may be lodged in writing or accepted as an oral statement. Complainants will be encouraged to provide as much information as possible. Anonymous complaints will be treated with the same priority as other complaints.

When communicating with a complainant, it is important to collect as much information as possible, including:

- the complainant’s name, address and best contact number
- identifying whether they are a HOME in PLACE tenant, resident, applicant or a member of the community
- the basis of their complaint; ask for dates, time and place of any associated events
- if the complaint is about a Worker, ask for the Worker’s name; if they are not able to provide this information, ask for a description of the Worker and what service was being provided at the time
- the name and, if possible, contact details of any witnesses
- how the incident has affected the person
- any further information or evidence that supports the complaint and will assist in the assessment and resolution process, and
any relevant documentation relating to the complaint should be scanned and attached to the Complaint Service Request.

2. Assess and Prioritise

On raising a Complaint Service Request, a priority status needs to be applied to the complaint for it to be processed appropriately. Determination of this status is based on what level of management is required to resolve the complaint. HOME in PLACE Workers are empowered to resolve issues where possible at first point of contact.

Priority definitions and examples are provided in the table below:

<table>
<thead>
<tr>
<th>Low priority Complaint</th>
<th>Moderate priority Complaint</th>
<th>High priority Complaint</th>
</tr>
</thead>
<tbody>
<tr>
<td>May relate to a single issue;</td>
<td>May relate to one or more issues;</td>
<td>• May involve a serious or significant risk to the complainant, organisation or engaged service provider;</td>
</tr>
<tr>
<td>• Involves minimal risk to the complainant, department or engaged service provider;</td>
<td>• Involves a reasonable degree of risk to the complainant, organisation or engaged service provider;</td>
<td>• Will involve a formal investigation; and,</td>
</tr>
<tr>
<td>• Will require a formal investigation; and</td>
<td>• Will involve a more detailed investigation; and,</td>
<td>• Is not suitable for local resolution.</td>
</tr>
<tr>
<td>• Will be suitable for local resolution.</td>
<td>• Should involve consultation as to whether it will be suitable for local resolution.</td>
<td>• High priority complaints must be handled by an Executive Manager, or delegate. The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</td>
</tr>
<tr>
<td>Low priority complaints would usually be handled by an Executive Manager, or delegate.</td>
<td>Moderate priority complaints would usually be handled by an Executive Manager, or delegate.</td>
<td></td>
</tr>
<tr>
<td>The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</td>
<td>The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</td>
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3. Investigate and action

HOME in PLACE may undertake various methods to gather information to substantiate a complaint.

The investigation process must be objective, reasonable and conducted in good faith. Decisions must be made on the weight of evidence and on the balance of probabilities. Investigating a complaint may include:

- clarifying the details provided in a complaint
- identifying actions taken to resolve the issue before the complaint was lodged
- gathering and analysing information from relevant file notes, correspondence and/or other sources
- reviewing applications submitted by the complainant
- reviewing documentation submitted by the complainant
- reviewing previous administrative decisions or actions
- interviewing complainants, Workers and/or other individuals involved in the complaint
- reviewing relevant policies, procedures and/or legislation, and
- reviewing previous complaints about the same issue.
Records of each investigation should contain all correspondence; including file notes of telephone conversations, interviews, and findings from investigations, recommendations and internal approvals. The file should also contain evidence of the steps taken to investigate the complaint including a summary of actions in respect of recommendations (if any) made.

All information will be gathered and recorded in Greentree against the Complaint Service Request. Any relevant documentation / evidence that has been gathered should be scanned and attached to the Complaint Service Request. This process will assist should the complaint need to undergo an Internal Review.

It should be recognised that complex matters may require a more detailed, structured investigation to be conducted and this should be communicated to the relevant parties.

**Actions Taken to Address a Complaint**

Following completion of the investigation into the complaint, the investigation findings are to be recorded and a written response to the complainant forwarded by the assigned user (in Greentree), including the reason/s for the decision and the steps taken to investigate the complaint should always be included.

The resolution of a complaint should include:

- **Acknowledgement** – of how the complainant has been affected and their expectations of a quality service
- **Apology** – for some people, a genuine apology may be all or part of what is sought
- **Answers** – an explanation of what happened or the provision of information that may be needed to address the complainant’s concerns
- **Action** – agreements on steps to address the concern and improve services.

If the complaint has been found to be substantiated or partially substantiated, details of remedial actions to be taken should be provided to the complainant in the written response. If the complaint is unsubstantiated, the reason for this decision must be provided to the complainant in writing.

The response letter must be generated by the Assigned User from Greentree using the letter templates provided. The response letter needs to be attached to the Complaints Service Request. The Complaint Service Request status can now be changed to *Closing of Complaint*.

Where possible the complainant should also be advised of the resolution via telephone. Telephone contact however does not eliminate the requirement to provide a written response (via post or email).

**Response Times**

Complaints will be investigated as quickly as possible. Complaints that relate to a simple matter should be finalised within seven days and a maximum of 30 days.
HOME in PLACE acknowledges that some complaints may require a more detailed investigation and, therefore, will result in more extended time for resolving the complaint. In these circumstances, the extended time for resolving the complaint will be communicated to the complainant.

**Ministerial Complaints** - Complaints which are made directly to HOME in PLACE by way of Ministerial correspondence or contact must be responded to and appropriately actioned within **24 hours** from the time a request for information by the Minister is received by HOME in PLACE. A ministerial complaint coming from the Minister will be deemed received on the date the Minister forwards the complaint to HOME in PLACE.

**Privacy and Confidentiality** - Any complaint that is made about a privacy issue will be completed within 60 days.

**Specialist Disability Accommodation (SDA) and Home For Life (H4L) Complaints** – Tenant complaints are acknowledged within 3 business days. An investigation into the tenant complaint is conducted and a written response provided by the Manager within 15 business days.

**Finalisation**

The Executive Manager will review the outcome of the complaint before changing the status of the Complaint Service Request to c5. Closing of Complaint File. They will then select a Closure Reason and attach a draft Closure Letter. During the review process, consideration should be given to what remedy and systems improvement may be required.

Complainants must receive written acknowledgement and advice about the resolution of their complaint within required timeframes (see Response Times above).

The response must include information about further steps they can take if they are dissatisfied with the resolution of a complaint such as referral to the:

- **Consumer and Commercial Division of the NSW Civil and Administrative Tribunal (NCAT)** for disputes relating to Residential Tenancy Agreements
- **NSW Family and Community Services Housing Appeals Committee (HAC)** where the matter is an appealable decision as defined by HAC.
- **Registrar for Community Housing** where the complaint is in relation to compliance as a registered community housing provider
- **Ombudsman** for complaints about Privacy complaints
- **Quality and Safeguarding Commission** for complaints related to NDIS and SDA

4. **Outcomes and System Improvement**

When developing system improvement recommendations, consideration should be given to the extent the action will:
• prevent the recurrence of similar complaints
• improve service delivery

System improvements can include:
• policy and procedure change
• practice review, and
• Worker training and other professional development activity may also be recommended.

Remedial action that may be appropriate and reasonable to remedy errors and deficiencies in service include (for example):
• an explanation
• a change in decision
• formal or informal dispute resolution
• an apology, and/or
• written warning letter or notice to remedy breach, and
• correction of any misleading or incorrect records.

Executive Managers are to take into consideration the complaint monitoring reports and are responsible for investigating the validity and applicability of the recommendations made by the Complaints Officer in informing corrective actions or continuous improvement strategies.

5. Monitoring Effectiveness and Reporting
Recording of complaints information allows identification of any trends or system issues to inform improvements to the services we provide.

The reporting function is performed by the Complaints Officer, Corporate Services.

Quarterly analysis of complaints data to identify and address any systemic issues, including improvements to products and services, policies and procedures and Worker training needs, will be undertaken by the Complaints Team Corporate Services.

Based on the quarterly analysis, the Complaints Officer, Corporate Services prepares a report which includes:
• the number, level, category and outcomes of complaints received,
• the time taken to resolve complaints and the number of complaints that were not resolved within the required timeframe, and
• complaint issues and trends for continuous improvement opportunities
# Complaint Management Responsibilities

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibilities</th>
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<tbody>
<tr>
<td><strong>Group Executive and Executive Management</strong></td>
<td>Group Executive and Executive Management are responsible for the following;</td>
</tr>
<tr>
<td></td>
<td>• Ensuring that the complaints management process and objectives are established within HOME in PLACE;</td>
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<td></td>
<td>• Ensuring that the complaints management process is planned, designed, implemented, maintained and continually improved in accordance with the complaints management policy of the organisation;</td>
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<td>• Identifying and allocating the management resources needed for an effective and efficient complaints management process;</td>
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<td></td>
<td>• Ensuring the promotion of awareness of the complaint’s management process and the need for a customer focus through HOME in PLACE;</td>
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<td></td>
<td>• Ensuring that information about the complaint’s management process is communicated to customers, complainants, and, where applicable, other parties directly concerned in an easily accessible manner;</td>
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<td>• Appointing a complaints management representative and clearly defining his or her responsibilities and authority in addition to the responsibilities and authority set out below;</td>
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<td>• Ensuring that there is a process for rapid and effective notification to top management of any significant complaints;</td>
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<td></td>
<td>• Periodically reviewing the complaints management process to ensure that it is effectively and efficiently maintained and continually improved.</td>
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<tr>
<td><strong>Complaints Officer Corporate Services</strong></td>
<td>The complaints officer is responsible for the following:</td>
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<td></td>
<td>• Establishing a process of performance monitoring, evaluation and reporting;</td>
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<td></td>
<td>• Reporting to top management on the complaint’s management process, with recommendations for improvement;</td>
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<tr>
<td></td>
<td>• Maintaining the effective and efficient operation of the complaint’s management process, including the training of appropriate personnel, technology requirements, documentation, setting and meeting target time limits and other requirements, and process reviews.</td>
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<tr>
<td><strong>Other managers</strong></td>
<td>Other managers involved in the complaint’s management process should, as applicable within their area of responsibility, be responsible for the following:</td>
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<td>• Ensuring that the complaints management process is implemented;</td>
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<td>• Liaising with the complaint’s management representative;</td>
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<td></td>
<td>• Ensuring the promotion of awareness of the complaint’s management process and of the need for a customer focus;</td>
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<tr>
<td></td>
<td>• Ensuring that information about the complaint’s management process is easily accessible;</td>
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<td></td>
<td>• Reporting on actions and decisions with respect to complaints handling;</td>
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<td></td>
<td>• Ensuring that monitoring of the complaint’s management process is undertaken and recorded;</td>
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<td></td>
<td>• Ensuring that action is taken to correct a problem, prevent it happening in the future, and that the event is recorded;</td>
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<td></td>
<td>• Ensuring that complaints management data are available for the executive management review.</td>
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<tr>
<td><strong>Frontline Workers</strong></td>
<td>All Workers in contact with clients and complainants are to:</td>
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<tr>
<td></td>
<td>• Be able to take a client or stakeholder complaint;</td>
</tr>
</tbody>
</table>
### 4. Responsibilities

All HOME in PLACE workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of HOME in PLACE policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to HOME in PLACE clients,
- inform HOME in PLACE’s clients of the impact of this procedure on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this procedure document and complete the relevant documentation to propose any amendments, and
- report breaches of HOME in PLACE’s policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about HOME in PLACE Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved HOME in PLACE’s Policy and Procedures to be reported and managed.

### 5. Implementation and Review

This procedure is listed on HOME in PLACE’s Controlled Documents Register and is a controlled document requiring approval of any changes. It may not be amended or shared outside HOME in PLACE without approval. The procedure is reviewed regularly and published on HOME in PLACE’s SharePoint intranet once approved. Employees receive communications and training on new and reviewed policies and procedures.
HOME in PLACE complies with relevant contractual compliance obligations and jurisdictional laws and regulations when implementing this procedure. Confirmation of internal compliance with this procedure is undertaken regularly.

It is the responsibility of HOME in PLACE Group Executive Services (GESAdmin@homeinplace.org) to maintain and update the HOME in PLACE’s Master procedure Document, procedure Directory and the procedure Review Register, administer the review and approval process and inform and distribute new and amended policies and procedures once approved (refer PROC-011 Policy and Procedure Development Approval).

HOME in PLACE Workers should refer to SharePoint Company Documents Policy and Procedure site for the latest version which takes precedent over any uncontrolled version. If this document is printed, downloaded, or saved elsewhere from this site it becomes an uncontrolled version.

For further information contact the Responsible Officer listed under Document Information.

6. Resources and related documents

**Related documents**

- Internal Review and Appeal Policy (POL-001)
- Child Safeguarding Policy (POL-003-02)
- Safeguarding People with Disability Policy (POL-003-03)
- Whistleblower Policy (POL-005-03)
- Fraud and Corruption Policy (POL-005-04)
- Complaints Policy (POL-012)
- Privacy Policy (POL-019)
- Anti-Social Behaviour Policy (POL-025-03)
- Neighbour Disputes and Annoyance, Pets & Cleanliness Policy (POL-025-34)
- Workplace Relations Manual Complaint and Grievance Policy (POL-028-06)
- Records Management Policy (POL-035)
- Records Management Policy Schedule (POL-035-01)
- Internal Review and Appeal Management Procedures (PROC-001)
- Safeguarding People with Disability Procedure (PROC-003-03)
- Policy and Procedure Development Approval and Review Procedure (PROC-011)
- Child Friendly Complaint Handling Guidelines (PROC-012-02)
- Safeguarding People with A Disability Complaint Handling Guidelines (PROC-012-03)
- Child Abuse Reporting Procedure (PROC-012-04)
- Registrar for Community Housing Complaints Handling Procedure (PROC-012-05)
- Privacy or Notifiable Data Breach Procedure (PROC-019-1).
- Dealing with Anti-Social Behaviour Procedure (PROC-025-03)
- Neighbour Disputes and Annoyance, Pets & Cleanliness Policy (PROC-025-34)
- Investigation Procedures (PROC-033)
- Group Documentation Structure and Quality Assurance (“QA”) Management Guidelines (GUI-018)
- Complaint form / Online complaint enquiry form
7. Definitions

Please refer to HOME in PLACE Glossary of Definitions for Policies and Procedures. Terms and definitions identified below are specific to this procedure and are critical to its effectiveness:

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antisocial Behaviour</td>
<td>Is when a person’s behaviour affects another person’s peace, comfort or privacy. It can encompass a range of activities or actions such as intoxication, loitering and general nuisance behaviour that interferes with other people/person.</td>
</tr>
<tr>
<td>Appeals</td>
<td>A Community housing appeal is defined as ‘any expression of dissatisfaction with a decision made by a social housing provider to provide or not provide a service (such as housing, transfer or priority on the housing register) or, a decision relating to a tenant or service user’s dissatisfaction of a decision made by the organisation.’ An application for a decision to be reversed or overturned. Includes but is not limited to: • Allocation decisions; • Level of rent or rent subsidy; • Eligibility for a housing transfer; • Permission to undertake modifications; • Permission to keep pets; • Calculation of water charges;</td>
</tr>
<tr>
<td>Associate</td>
<td>An “associate” of a regulated entity includes directors and company secretaries of the regulated entity and its related bodies corporate and may also include a range of individuals within whom the regulated entity acts in concert or is otherwise associated in a formal or informal way. These include visitors to our programs (including media), advisory group members, interns, supporters (donors, sponsors, advocates, ambassadors), trustees, members, staff in consulting and partnership agencies, and any other individuals or groups that have been brought in contact with children (including their personal information and images) while working with and / or supporting HOME in PLACE.</td>
</tr>
<tr>
<td>Client</td>
<td>A customer, tenant or applicant. A person or group that uses the professional advice or services of a lawyer, accountant, advertising agency, architect, etc. A person who is receiving the benefits, services, etc., of a social welfare agency, a government bureau, etc.</td>
</tr>
<tr>
<td>Compass</td>
<td>Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the Corporations Act 2001 (Cth)) and as a charity with the Australian Charities and Not-for-profit Commission (ACNC).</td>
</tr>
<tr>
<td>Complainant</td>
<td>Person with a Complaint ongoing with HOME in PLACE.</td>
</tr>
<tr>
<td>Complaint</td>
<td>An expression of dissatisfaction made to HOME in PLACE about the quality of our services or decisions made in delivering these services or the complaints management process itself, where a response or resolution is explicitly or implicitly expected.</td>
</tr>
<tr>
<td>Complaints</td>
<td>An expression of dissatisfaction with an aspect of the services provided by [Organisation], where the complainant is unhappy with the standard or type of service. Types of Complaint include: • Where HOME in PLACE have failed to provide or there has been a delay or problem in providing a service; • Where HOME in PLACE have failed to follow or have been unfair or inconsistent in applying our policies or procedures. • Where HOME in PLACE have failed to keep Tenants informed, through lack of or insufficient information • Where there has been inappropriate behaviour or attitude from a HOME in PLACE Employee or contractor.</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Director</td>
<td>Has the same meaning as defined in the Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary in Australia and as defined in the Companies Act 1992 Part 1 Section 2 Interpretation.</td>
</tr>
<tr>
<td>Employee</td>
<td>A person engaged under an employment agreement or award by any company in the HOME in PLACE Group.</td>
</tr>
<tr>
<td>Enquiry</td>
<td>An enquiry refers to a client’s request for information related to the services or the request for assistance of services which HOME in PLACE provides. An enquiry can be received by phone, postal mail, fax or other electronic transmission.</td>
</tr>
<tr>
<td>Executive Manager</td>
<td>Many positions within HOME in PLACE include the title “Executive Manager”. Regardless of whether an Executive Manager heads a Business Unit, the delegated authority of each Executive Manager depends on the functions and reporting relationship of the Business Unit for which the Executive Manager is responsible. Executive Managers should refer to the document HOME in PLACE Organisational Chart in Terms of Levels of Delegated Authority for confirmation of the band of authority they hold.</td>
</tr>
<tr>
<td>HOME in PLACE</td>
<td>Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the Corporations Act 2001 (Cth)). This includes Compass Housing Services Co (Queensland) Ltd Trading as HOME in PLACE and Compass Housing Services Co (Victoria) Ltd Trading as HOME in PLACE both of which are a wholly owned subsidiary of Compass registered in Australia.</td>
</tr>
<tr>
<td>HOME in PLACE (New Zealand)</td>
<td>HOME IN PLACE (NEW ZEALAND) LIMITED (formerly Compass Housing Services (NZ) Co Ltd) is registered in New Zealand under the Companies Act and as a charity registered with Charities NZ under the Charities Act.</td>
</tr>
<tr>
<td>HOME in PLACE Group</td>
<td>The corporate structure that includes HOME in PLACE (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.</td>
</tr>
<tr>
<td>Independent contractor</td>
<td>means a party engaged directly by HOME in PLACE pursuant to a contract for services. In the context of workforce engagements, this includes sole traders, companies, or partnerships with whom HOME in PLACE enters into an agreement for the provision of specified individuals to supply specific skills, services, or consultancy arrangements. It does not include individuals engaged through labour hire agencies. Independent contractors are not employees of HOME in PLACE.</td>
</tr>
<tr>
<td>Neighbour Dispute</td>
<td>Involves 2 or more neighbours that disagree on issues such as behaviour of tenants, noise, fences, trees, car parking, visitors or pets.</td>
</tr>
<tr>
<td>Officer</td>
<td>Has the same meaning as defined in the Corporations Act 2001 Part 1.2 Division 1 Section 9 Dictionary in Australia and as defined in the Companies Act 1992 Part 1 Section 2 Interpretation in New Zealand</td>
</tr>
<tr>
<td>Parent Board</td>
<td>The current directors of HOME in PLACE.</td>
</tr>
<tr>
<td>Parent Company</td>
<td>HOME in PLACE</td>
</tr>
</tbody>
</table>
| Partners                    | individuals, groups of people or organisations that collaborate with ACFID Members to achieve mutually agreed objectives in development and humanitarian initiatives. This may include affiliates. | 1  
| Partnership                 | An ongoing working relationship where risks and benefits are shared (Partnership Brokers Association)                                                                                                   |
| Risk                        | Involves the probability of minimal / reasonable / serious or significant damage or liability to the complainant, department or engaged service provider.                                                                 |

1 Definition adopted from ACFID general definitions provided to clarify the use of key terms with reference to the ACFID Code of Conduct, June 2019, [https://acfid.asn.au/content/general-definitions](https://acfid.asn.au/content/general-definitions)
### Term | Definition
--- | ---
**Service Request (SR)** | A service request is a service ‘ticket’ that enables a request for service to be reliably submitted, processed, approved, monitored and delivered.

**Service Request Management (SRM)** | Is the process of managing a service request through its lifecycle from submission through delivery and follow-up. As set up in Greentree, a user contacts a help desk to request a service and help desk personnel create a service ticket to assign the service request to the appropriate team. These systems also typically enable users to track the status of their service requests, and management to monitor service delivery levels for quality control purposes.

**Stakeholder** | person or organisation that can affect, be affected by, or perceive themselves to be affected by a decision or activity, may also be called ‘interested party’.

**Subsidiary Boards** | The appointed board of directors of a Subsidiary Company.

**Subsidiary Company** | A company in which HOME in PLACE owns all or at least a majority of the shares.

**User** | any person or entity that use HOME in PLACE Information or ICT Assets.

**Worker (HOME in PLACE)** | has the same meaning as defined in the [NSW Work Health and Safety Act 2011 No 10 Subdivision 2 Part 7 Meaning of ‘worker’ (1)](https://www.legislation.nsw.gov.au/Details/L/2011/10). A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as:
- an employee, or
- an independent contractor or subcontractor, or
- an employee of a contractor or subcontractor, or
- an employee of a labour hire company who has been assigned to work in the person’s business or undertaking, or
- an outworker, or
- an apprentice or trainee, or
- a student gaining work experience, or
- a volunteer, or
- a person of a prescribed class.

**Worker (HOME in PLACE QLD)** | is ‘a person who works under a contract and, in relation to the work, is an employee for the purpose of assessment for PAYG withholding under the Taxation Administration Act 1953 (Cwlth), schedule 1, part 2-5’. This applies to a person for whom PAYG tax instalments are required or would be required to be withheld by their employer.

**Worker (HOME in PLACE VIC)** | A worker is defined as an individual:
- who
  - performs work for an employer or
  - agrees with an employer to perform work
- at the employer’s direction, instruction or request, whether under a contract of employment (whether express, implied, oral or in writing) or otherwise or
- who is deemed to be a worker by the legislation.

### 8. List of Annexures
- Annexure 1: Complaint Types
- Annexure 2: Complaint Handling Process
## Annexure 1: Complaint Types

<table>
<thead>
<tr>
<th>Category</th>
<th>Complaints</th>
<th>Not classified as complaints</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contractors</td>
<td>Complaints specific to external contractors and their interaction with HOME in PLACE tenants regarding:</td>
<td>• Requests to do work in non-common areas</td>
</tr>
<tr>
<td></td>
<td>• Quoting</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Conduct</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Behaviour</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Incomplete or substandard work</td>
<td></td>
</tr>
<tr>
<td>Anti-Social Behaviour / Neighbour Disputes</td>
<td>Antisocial behaviour/ neighbour disputes are recorded in Greentree under Complaints Service Requests. As these are often areas that HOME in PLACE does not have direct control over, they are also covered under the Dealing with Anti-Social Behaviour Policy. See Antisocial Behaviour Policy/Procedure.</td>
<td>• Continual neighbour disputes (these should be referred to CJC)</td>
</tr>
<tr>
<td></td>
<td>Antisocial behaviour/ neighbour disputes include:</td>
<td>• Vandalism (police)</td>
</tr>
<tr>
<td></td>
<td>• Excessive and persistent noise i.e. loud music, constant banging or loud noise. (not one-off incidents)</td>
<td>• Verbal abuse (police)</td>
</tr>
<tr>
<td></td>
<td>• Persistent loud or unruly behaviour</td>
<td>• Illegal activity i.e. drug use or distribution (police)</td>
</tr>
<tr>
<td></td>
<td>• Loitering</td>
<td>• Serious harassment / stalking (police)</td>
</tr>
<tr>
<td>Local MP</td>
<td>Letters from local MPs on behalf of tenants</td>
<td>• Threats (police), or</td>
</tr>
<tr>
<td></td>
<td>*Third party consent is automatically granted by the tenant by engaging representation of the local MP on his/her behalf to share information relating to the tenancy.</td>
<td>• Physical assaults or acts of violence (police)</td>
</tr>
<tr>
<td></td>
<td>Complaints which are made via ministerial correspondence will be dealt with in the same way as other complaints.</td>
<td></td>
</tr>
<tr>
<td>Maintenance</td>
<td>Complaints regarding the service delivery specific to maintenance of assets and quality of repairs undertaken. Timeframe to complete lodged service request (must be already logged but not communicated or actioned)</td>
<td>Maintenance that has not been completed where there is no previous SR raised.</td>
</tr>
<tr>
<td>Maintenance FACS</td>
<td>Any complaint received (either from a tenant or from Department of Community &amp; Justice (DCJ) regarding maintenance to properties currently maintained by LAHC contractors.</td>
<td></td>
</tr>
<tr>
<td>Marketing, Comms, Events</td>
<td>Includes:</td>
<td>Personal feeling or opinions about the content of correspondence</td>
</tr>
<tr>
<td></td>
<td>• Any correspondence including tenant newsletters (must be a legitimate complaint about offensive content)</td>
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<tr>
<td></td>
<td>• Dissatisfaction with the type of events held,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Inclusion or exclusion from HOME in PLACE held events,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Photos or articles of tenants used or published without prior permission</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Political bias</td>
<td></td>
</tr>
<tr>
<td>Privacy/Confidentiality</td>
<td>Where a tenant feels we have breached their privacy and disclosed confidential information or accessed their confidential information without permission</td>
<td>Complaints regarding authorised access to information or requests for a specific Worker to access information due to a personal grudge.</td>
</tr>
<tr>
<td>Category</td>
<td>Complaints</td>
<td>Not classified as complaints</td>
</tr>
<tr>
<td>-------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>SDA/H4L</td>
<td>Any complaint made by a HOME in PLACE tenant who is part of the SDA or H4L program</td>
<td></td>
</tr>
<tr>
<td>Service Delivery</td>
<td>An expression of dissatisfaction made to HOME in PLACE related to its products or services (including those delivered by contracted providers), where a response is expected</td>
<td>Personal grudges against a Worker.</td>
</tr>
<tr>
<td>Tenancy Management</td>
<td>Complaints received regarding HOME in PLACE tenancy management may include and not limited to:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Parking Allocations;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Garbage bins and Rubbish;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Overgrown Grass; or</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Unauthorised Pets</td>
<td></td>
</tr>
<tr>
<td>Tenancy SHMT</td>
<td>Any complaint made that refers to a HOME in PLACE tenant residing in a SHMT property.</td>
<td></td>
</tr>
<tr>
<td>Use of Premises</td>
<td>Complaints received regarding a HOME in PLACE tenants’ ‘Use of Premises’. For example:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Neighbour report of additional occupancy; or</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Neighbour report of dwelling use for illegal purposes.</td>
<td></td>
</tr>
</tbody>
</table>
Annexure 2: Complaint Handling Process

External Complaint Handling Process

1. **Assigned User**
   - Open SR and review information in the problem description.
   - Investigate the complaint.
   - Make direct contact with complainant within 24 hours and record as a Communication against the SR.
   - Draft the Closing Letter using the print function on the SR.
   - Attach the Closing Letter using the print function on the SR.
   - Change the status to 'Closing of Complaint file'.
   - SR appears on Assigned User's desk as 'SRs for my Action'.

2. **Compliance – Corporate Services Team**
   - Log follow-up actions and communications.
   - Audit or follow-up actions.
   - Complaint data reported and analysed.
   - Quality improvement strategies identified.
   - SR appears on Assigned Users desk as 'SRs Awaiting Action.'

3. **End of document.**