

Complaint Handling Policy

1. Purpose

This policy outlines HOME in PLACE's commitment to the provision of a system for managing client and stakeholder complaints and how Home in Place will deal with complaints from clients and stakeholders about our service delivery.

HOME in PLACE is a socially regenerative landlord and together with a large network of partners provides housing and support to individuals, families and vulnerable people including people who are homeless or at risk of homelessness, people on very low, low and moderate incomes, people with disability and people with complex and specialist support needs.

HOME in PLACE recognises the importance and value of listening and responding to concerns and complaints and are committed to achieving the highest standard in every area of our work and continuous improvement. This applies - especially to delivery of services, seeking donations and accountability to stakeholders generally.

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. Receiving concerns and complaints is one of the most important ways of identifying continuous improvement opportunities to improve our service delivery.

HOME in PLACE is committed to working in accordance with (while striving to exceed) the standards required by Code of Conduct of the Australian Council for International Development (ACFID) signatory organisations, and the National Standards for Disability Services.

HOME in PLACE makes clear the value placed on receiving concerns and complaints in all relevant communications, advises how a copy of this policy may be obtained and provides clear information on how complaints may be made.

2. Scope

A complaint may be made by a person to whom Home in Place deliver services or who may be affected by our service delivery in relation to our Workers, Partners, Associates and anyone else acting on behalf of a member of the HOME in PLACE Group.

This policy 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 POL-025-04 Management of Antisocial Behaviour Policy & Home in Place PROC-006 Management Antisocial Behaviour Procedure

- Complaints and grievances by Home in Place' Workers against other Home in Place Workers are dealt with in Home in Place POL-028 Workplace Relations Policy Manual ("Grievance Policy ref P38").
- Complaints involving allegations of fraud, corruption, misconduct and financial wrongdoing are managed in accordance with Home in Place POL-005-04 Fraud and Corruption Policy, Home in Place POL-005-06 Financial Wrongdoing Policy) and Home in Place PROC-033 Investigation Procedure.
- Complaints received from the Registrar for Community Housing are managed in accordance with Section 3 "Registrar for Community Housing Complaints" of this Policy.
- Appeals about decisions made by Home in Place which are dealt with in Home in Place Internal Review and POL-001 Appeals Policy.

Anonymous complaints can be lodged, recorded and investigated however, Home in Place's ability to investigate and act on anonymous complaints may be limited.

The process for handling child complaints may be generally managed in accordance with this policy however refer to Home in Place POL-003-02 Child Safeguarding Policy and Home in Place PROC-012-02 Child Friendly Complaint Handling Procedure 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 policy however refer to Home in Place POL-003-03 Safeguarding People with A Disability Policy.

3. Policy Statement

Effective complaints management is fundamental to the provision of quality service and is one of the most important ways for obtaining feedback from clients and stakeholders, resolving disputes, learning what is required to improve our work and reforming policies and procedures.

HOME in PLACE Complaints handling process is managed by the Executive Manager of Group Executive Services (GES) and administered by the GES Complaints Officer

HOME in PLACE is committed to effectively handling complaints promptly and professionally. This includes anonymous complaints.

HOME in PLACE will ensure that:

- complaints will be treated seriously and assessed in a timely manner in accordance with HOME in PLACE PROC-012-01 Complaint Handling Procedure,
- the level of investigation will be commensurate with the seriousness, frequency and consequences of a complaint,
- attempts will be made to resolve complaints within the local area in which they originate, to the greatest extent practical, and
- as part of our active tenancy management plan Home in Place will manage tenants and stakeholders to encourage feedback, compliments and complaints so that they can be addressed in a timely manner and proactively de-escalating issues to reduce the amount of escalated complaints.

- adopt a child-friendly approach to receive and deal with complaints from children. Refer HOME in PLACE PROC-012-02 Children Friendly Complaint Handling Procedure.

Principles

HOME in PLACE's commitment to complaint handling is based on the Quality Principles required by signatories to the ACFID Code of Conduct. Home in Place have adopted the following principles for our Complaint Handling Policy and Procedures:

Principle	ACFID Definition	What this means to Home in Place
INTEGRITY	We act with honesty and are guided by ethical and moral principles in all that we do.	<ul style="list-style-type: none"> • HOME in PLACE has a customer/client-focused approach considering the interests and rights of customers and clients, being open and responsive to feedback including complaints and demonstrating a commitment to resolving complaints fairly, effectively and in a timely manner.
ACCOUNTABILITY	We take responsibility for our actions and are accountable to all our stakeholders, and in particular primary stakeholders, for our performance and integrity.	<ul style="list-style-type: none"> • HOME in PLACE will ensure that accountability for and reporting on the actions and decisions with respect to complaint handling is clearly established. • All employees accept responsibility for effective complaints handling. • The responsible officer will ensure that, where appropriate, issues raised in the complaints-handling process are reflected in reporting.
TRANSPARENCY	We openly share information about our organisations and our work to all our stakeholders and to the public.	<ul style="list-style-type: none"> • HOME in PLACE will clearly publicise information about how and where to complain. Information about how and where to complain is - well publicised and visible to clients, personnel and other interested parties through complaint information on our website, via brochures, newsletters and mail outs. • Regarding Specialist Disability Accommodation, information relating to HOME in PLACE's complaints process is available to all Supported Independent Living providers.
EFFECTIVENESS	We strive to deliver outcomes that bring about positive change in the lives of people living in poverty.	At all times, Home in Place will thoroughly investigate all complaints with an un-biased approach and seek to identify areas for continual improvement that benefit the quality of service provided to our clients.

Principle	ACFID Definition	What this means to Home in Place
RESPECT	We recognise the value and diversity of every person and are committed to treating others with due regard for their rights, dignity and integrity.	<ul style="list-style-type: none"> Complainants are to be treated courteously and be kept informed of the progress of their complaint through the complaints-handling process. In relation to people with disability, customer/client-focused has the same meaning as person-centred.
EQUITY	We are committed to overcoming prejudices and disadvantage and promoting fair and just access to resources and opportunities.	HOME in PLACE will address all complaints in an equitable, fair and unbiased manner through the complaints-handling process considering evidence submitted by the complainant and HOME in PLACE Workers, Partners and Associates.
COOPERATION	We work with and alongside others in a spirit of mutuality, respecting diversity and difference in the pursuit of common goals.	Home in Place will liaise with Workers, Partner, Associates, stakeholders and external parties without prejudice and will remain respectful of diversity.

In addition, Home in Place have adopted the following principles for our Complaint Handling Policy and Procedures:

Principle	What this means
ACCESSIBILITY	<ul style="list-style-type: none"> HOME in PLACE will ensure that our complaint handling process is as accessible as practically to all complainants: information about our complaint process is readily available; complaints can be made by a person other than the actual complainant, such as an advocate of a person with disability; complaints can be made verbally, in writing (including drawings done by a person with disability), in person or by an electronic means including by lodging through our website or by email; and special arrangement and/or support can be made available for complainants with specific needs (including availability of interpreters, cross-culturally trained staff, and accessibility requirements for people with disability) as required.
RESPONSIVENESS	<ul style="list-style-type: none"> HOME in PLACE will respond to a complaint according to our predetermined timeframes. Complaints will be addressed promptly in accordance with their urgency. If complaints are received via face to face or telephone, acknowledgement is immediate however acknowledgement in writing will be issued in accordance to this policy and associated procedures. If complaints are received via email, acknowledgement is sent upon receipt of email. If it is established that an enquiry is in fact a complaint, then written acknowledgement will be sent within - 3 working days. The complainant will be contacted with the proposed resolution within 2 weeks of HOME in PLACE receiving the complaint unless there are multiple or complex issues.

Principle	What this means
	<ul style="list-style-type: none"> More complex complaints and complaints with multiple issues will receive an initial response within two (2) weeks and a final response as soon as possible thereafter generally no later than six (6) weeks after the complaint was lodged. If more time is needed, the complainant will receive an update at six weeks and estimated time for a final response. The Complaints Officer is responsible for closing the complaint and will review and ensure the complaint is resolved, a final response sent and closed in accordance with our predetermined timeframes. If a complaint relating to a person living in an SDA dwelling is deemed to be a reportable incident, the person receiving the complaint will act according to SDA Incident Management and Reportable Incidents Policy (POL-052).
CHARGES	Access to the complaint handling process is free of charge to complainants.
CONFIDENTIALITY	<p>Home in Place will observe strict confidentiality in complaint handling:</p> <ul style="list-style-type: none"> Personally, identifiable information concerning the complainant will be made available only where needed and for the purposes of addressing the complaint within the organisation, and will be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure. The complainant will be advised of this in the acknowledgement of the complaint. Complaints made by third parties, on behalf on a Home in Place tenant, must complete the required Consent documentation (Authority to Act / Consent to Exchange Information). Without the required approval, Home in Place are unable to disclose details of complaints regarding their tenants as this would breach our obligation to uphold our tenants privacy <p><i>NOTE:</i> If a complaint is received from the Local Member or Parliament or the Tenancy Advocate, authority to act is assumed.</p>
CONTINUAL IMPROVEMENT	Continual improvement of the complaint handling process and the quality of services is one of our permanent objectives. Data and information provided from the complaint-handling process will be used by HOME in PLACE in our commitment to continuous improvement and the quality of the provision of our services.
CHILD FRIENDLY	HOME in PLACE will adopt a child friendly approach to receive and deal with complaints from children using simple and child-friendly questions and/or using staff who have received training in working with children to assist with the complaint. Only HOME in PLACE staff who have a current Working with Children Check will be involved in dealing with complaints from children.

Complaint Levels

Low priority Complaint	Moderate priority Complaint	High priority Complaint
<ul style="list-style-type: none"> • May relate to a single issue. • Involves minimal risk to the complainant, department or engaged service provider. • Will require a formal investigation; and • Will be suitable for local resolution. 	<ul style="list-style-type: none"> • May relate to one or more issues. • Involves a reasonable degree of risk to the complainant, organisation or engaged service provider. • Will involve a more detailed investigation; and, • Should involve consultation as to whether it will be suitable for local resolution. 	<ul style="list-style-type: none"> • May involve a serious or significant risk to the complainant, organisation or engaged service provider. • Will involve a formal investigation; and, • Is not suitable for local resolution.
<p>Low priority complaints would usually be handled by an Executive Manager, or delegate.</p> <p>The Executive Manager may assign the investigation to an appropriate officer; however, the Executive Manager must sign off on the outcome of the complaint.</p>	<p>Moderate priority complaints would usually be handled by an Executive Manager, or delegate.</p> <p>The Executive Manager may assign the investigation to an appropriate officer; however, the Executive Manager must sign off on the outcome of the complaint</p>	<p>High priority complaints must be handled by a Group Executive Manager (GEM) GEM may assign the investigation to an appropriate officer; however, the GEM must sign off on the outcome of the complaint.</p>

Complaints HOME in PLACE will not Action

HOME in PLACE will not accept complaints about matters already dealt with or currently being dealt with by another third-party agency, court or tribunal; matters that are impractical to investigate; or matters that appear to be frivolous, vexatious, misconceived or lacking in substance.

Frivolous or Vexatious Complaints

For the purpose of this Policy, frivolous or vexatious complaints are defined as complaints that have no reasonable or sound basis in fact, are without merit, and/or have been made with the intention of harassing and/or discrediting Home in Place, a Home in Place tenant or Home in Place worker and have no reasonable prospect of reaching a mutually agreeable resolution.

Home in Place maintains a zero-tolerance stance on aggressive / abusive / derogatory behaviour towards any member of staff. Home in Place understand that, at times, complainants may be emotionally driven. Home in Place employees will, in the first instance, work with the complaint to de-escalate a situation however if the complainant displays behaviour with the potential to cause harm, the Home in Place is within their rights to terminate the interaction and not accept or register the complaint. For more details on dealing with difficult and challenging behaviour, refer to POL-020 Dealing with Difficult and Challenging Behaviours Policy.

Complaints that are identified as being frivolous or vexatious or contain abusive/aggressive/derogatory behaviour towards any member of staff, will not be registered, investigated or progressed. Home in Place will acknowledge receipt of the correspondence and advise the complainant of Home in Place's rights and responsibilities in accordance with company policy and procedure.

Matters already dealt with by Home in Place

If a complainant would like to request a review or appeal a decision made by HOME in PLACE, please refer to HOME in PLACE POL-001 Appeals Policy for how to lodge a request for an internal review.

In NSW, community housing tenants and applicants can request a second-tier appeal about some decisions made by HOME in PLACE Workers. These are referred to as 'Reviewable and Appealable Decisions' (refer to FACT-002 Complaints and Appeals Flyer for more details).

Reviewable or Appealable Decisions

Some decisions made by HOME in PLACE workers about housing services provided to clients can be appealed (reviewed).

Clients may request a review of a decision made by a worker of HOME in PLACE about their tenancy.

More information about this is available in HOME in PLACE POL-001 Appeals Policy and PROC-002 Appeals Management Procedure or from the Housing Appeals website (www.hac.nsw.gov.au).

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 PROC-012-01 Complaints Handling Procedure (*Registrar for Community Housing Complaint*).

Privacy Complaints

The Group Chief Technical Officer (GCTO) is appointed as HOME in PLACE Privacy Officer.

Privacy complaints are lodged via Tickit and referred to the GCTO for investigation and action in accordance with HOME in PLACE POL-019 Privacy Policy and HOME in PLACE POL-036 ICT Breach Management Policy.

Complaints including allegations of fraud, corruption, misconduct and/or financial wrongdoing

The Group Chief Legal Officer is appointed as the HOME in PLACE Fraud Officer.

Complaints including allegations of fraud, corruption, misconduct and/or financial wrongdoing 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 POL-005-04 Fraud and Corruption Policy, HOME in PLACE POL-005-06 Financial Wrongdoing Policy and HOME in PLACE PROC-033 Investigation Procedure. 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 POL-005-03 Whistleblower Policy for whistleblower protections and provisions that apply to the complaint investigation.

Anti-Discrimination Complaints

Anti-discrimination complaints are raised as a Complaint.ServDelivery SR in GreenTree and referred to the Chief Operating Officer (COO) for investigation and response.

Anti-Discrimination complaints, received via the Anti-Discrimination Board are lodged via HOME in PLACE's online system for incident and risk management and referred to the COO for investigation. Complaints are responded to by the Executive Manager Group Executive Services as delegated by the Group Managing Director. Refer to HOME in PLACE PROC-012-01 Complaints Handling Procedure (Anti-Discrimination Complaints)

Anti-Discrimination complaints are responded to in accordance with HOME in PLACE POL-028-05 workplace Bullying and Harassment Policy, Anti-Discrimination Act, 1977 (NSW), Anti-Discrimination Act 1991 (QLD) and Equal Opportunity Act 2010 (VIC).

Complaints from Children

HOME in PLACE has in place a child-friendly complaint handling process that include access to support from appropriate children support agencies and/or a person who has received training in working with children or equivalent. Refer to HOME in PLACE POL-003-02 Child Safeguarding Policy, HOME in PLACE PROC-012-02 Child Friendly Complaint Handling Procedure and HOME in PLACE PROC-012-04 Child Abuse Reporting Procedure for additional requirements for managing child complaints.

The Group Chief Strategic Engagement Officer is appointed as HOME in PLACE Child Protection Incident Reporting Focal Officer who is responsible for overseeing all child complaint handling processes.

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 Officer at complimentsandcomplaints@homeinplace.org

or posted to:

Attn: Home in Place Complaints Officer
P O Box 58,
WICKHAM NSW 2293

The complainant will receive an acknowledgement/letter of receipt (inclusive of a reference number).

Communication, Training and Awareness

Information on how to make a complaint is available on the HOME in PLACE website, available from local branch offices, by telephone to HOME in PLACE Customer Service Centre on 1300 333 733 and from HOME in PLACE website.

This includes:

- Having a brochure about HOME in PLACE complaint and appeals management and handling process brochure available at Campus locations
- Including the procedures in the organisation's information package for tenants/applicants;
- Displaying information on noticeboards;
- Placing reminders in newsletters; and,
- Providing access online to information and forms.

Workers involved in managing or coordinating complaints receive information and training on HOME in PLACE complaints management process as required. Information is available to workers internally from HOME in PLACE SharePoint Intranet Site for Company Documents.

Where appropriate Home in Place will ensure Workers, working in communities we serve, have all necessary training to encourage and handle inquiries, expressions of concern and making of complaints considering cultural and gender sensitivities and to ensure that cases involving children and people with a disability are handled appropriately.

Electronic complaints register

HOME in PLACE registers all inquiries and complaints.

HOME in PLACE maintains an electronic complaint record system and GreenTree is the primary tool for the electronic collection of this information, although HOME in PLACE Tikit incident and risk reporting system is used for managing Registrar Complaints, Privacy and Notifiable Data breaches, Child Complaint Investigations and

investigations related to violence, neglect or abuse of children or people with a disability. Records relating to complaints will be maintained within each respective area of responsibility.

Collection and reporting of complaint information

HOME in PLACE has established procedures for recording complaints and responses and for using these records and managing them, while protecting any personal information and ensuring the confidentiality of complainants.

HOME in PLACE immediately escalates complex and/or major complaints to our Group Managing Director or his/her delegate.

HOME in PLACE complaints are reported on mid-quarter, quarterly and annually. Minor complaints are reported in summary form and Major complaints will be reported in detail.

Continual improvement

HOME in PLACE is committed to continually improving the effectiveness and efficiency of the complaints-handling process. As a result, HOME in PLACE continually improves standard of work and the quality of services. This can be achieved through corrective and preventive actions and innovative improvements.

On a continuing basis Home in Place will monitor the effectiveness of the complaint handling and make improvements as appropriate.

HOME in PLACE will act to eliminate the causes of existing and potential problems leading to complaints in order to prevent recurrence and occurrence, respectively. In HOME in PLACE's commitment to continuous improvement Home in Place will;

- explore, identify and apply best practices (both locally and overseas) regarding complaint handling,
- foster a customer/client-focused approach,
- encourage innovation in complaints-handling development,
- maintain data collection on complaints for the purpose of identifying trends or upcoming issues,
- provide data on complaints to HOME in PLACE management team on a quarterly basis to identify trends or review issues and improve practice where necessary,
- undertake specific training and retraining of staff to foster better complaint handling practices,
- encourage innovation in complaint handling development, and
- recognise exemplary complaints-handling behaviour.

Analysis and evaluation of complaints

All complaints should be classified and assessed as per the Complaint Handling Procedures and then analysed to identify systemic, recurring, and single incident problems and trends, and to help eliminate the underlying causes of complaints.

Satisfaction with the Complaints-Handling Process

Regular action will be taken to determine the levels of satisfaction of complainants with the complaints-handling process. This may take the form of random surveys of complainants and other techniques.

Monitoring of the Complaints-Handling Process

Continual monitoring of the complaints-handling process, the resources required (including personnel) and the data to be collected should be undertaken.

The performance of the complaints-handling process should be regularly reviewed.

Auditing of the Complaints-Handling Process

HOME in PLACE will regularly perform or provide for audits in order to evaluate the performance of the complaints-handling process. The audit should provide information on:

- Process conformity to complaints-handling procedures, and;
- Process suitability to achieve complaints-handling objectives.

The complaints-handling audit may be conducted as part of the quality management system audit. The audit results should be considered in the management review to identify problems and introduce improvements in the complaints-handling process. The audit should be carried out by competent individuals independent of the activity being audited.

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 policy on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this policy 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.

In the context of Specialist Disability Accommodation services provided by HOME in PLACE, all staff are responsible for safeguarding the wellbeing and safety of people with disability. Any staff member aware of any risk to a person with disability, whether that is a concern, complaint or a specific incident, must immediately report it to their manager.

5. Implementation and Review

This policy 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 policy 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 policy. Confirmation of internal compliance with this policy is undertaken regularly.

It is the responsibility of HOME in PLACE Group Executive Services to maintain and update the HOME in PLACE's Master Policy Document, Policy Directory and the Policy 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 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

- POL-001 Appeals Policy
- POL-003-02 Child Safeguarding Policy
- POL-003-03 Safeguarding People with Disability Policy
- POL-019 Privacy Policy
- POL-025-04 Management of Antisocial Behaviour Policy
- POL-028 Workplace Relations Manual (Grievance Policy)
- POL-028-05 workplace Bullying and Harassment Policy
- POL-035-01 Records Management Policy
- POL-052 SDA Incident Management and Reportable Incidents Policy
- POL-036 ICT Breach Management Policy
- POL-020 Dealing with Difficult and Challenging Behaviours
- PROC-002 Appeals Management Procedures
- PROC-003-03 Safeguarding People with Disability Procedure
- PROC-011 Policy and Procedure Development Approval and Review Procedure
- PROC-012-02 Child Friendly Complaint Handling Procedure
- PROC-012-03 Safeguarding People with A Disability Complaint Handling Guidelines
- PROC-006 Management Antisocial Behaviour Procedure
- PROC-020 Dealing with Difficult and Challenging Behaviours Procedure
- FACT-002 Complaints and Appeals Flyer
- FLOW-012-01 Complaint Handling Flowchart
- FLOW-012-04 Receiving a Complaint Flowchart

- GUI-119 Raising a Complaint SR in GT Guide
- Complaint form / Online complaint enquiry form

Related legislation/standards

NATIONAL

- Corporations Act 2001
- Privacy Act 1988
- Disability Services Act 1986 (Cwlth)
- Disability Discrimination Act 1992 (Cwlth)
- National Disability Insurance Scheme Act 2013 (Cwlth) and associated Rules
- National Standards for Disability Services
- United Nations Convention on the Rights of Persons with Disabilities

NEW SOUTH WALES

- Residential Tenancies Act 2010
- Housing Act 2001 (NSW)
- Anti-Discrimination Act, 1977 (NSW)

QUEENSLAND

- Housing Act 2003 (QLD);
- Residential Tenancies & Rooming Accommodation Act 2008;
- Residential Tenancies & Rooming Accommodation Amendment Regulation (No 1) 2014
- Anti-Discrimination Act 1991 (QLD)

VICTORIA

- Housing Act 1983
- Residential Tenancies Act 1997 (Vic)
- Equal Opportunity Act 2010 (VIC)

STANDARDS AND GUIDELINES – EXTERNAL

- [ISO 19011:2018 'Guidelines for auditing management systems'](#)
- Australian Standard AS/NZS [ISO 10002:2018 'Quality Management – Customer Satisfaction – Guidelines for complaints handling in organisations'](#)
- [National Housing Standards](#) as specified Standard 3.6 Complaints and Appeals.
- [Ombudsman Better Practice Complaints Handling Guide](#)

7. Definitions

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

Term	Definition
Anti-Social Behaviour	Relate to wide neighbourhood issues, such as difficulties with neighbours or accusations of antisocial behaviour. Often, these are areas that HOME in PLACE does not have direct control over, which is why it is covered under Dealing with Anti-Social Behaviour Policy.
Appeals	<p>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.’</p> <p>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;</p>
Associate	<p>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.</p> <p>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.</p>
Client	Means an Applicant, Tenant, Resident, Participant or any other person attending an activity or using services provided by HOME in PLACE.
Committee	means a committee established by resolution of and reporting to the Parent Board in accordance with HOME in PLACE Constitution Clause 6 (specifically 6.1, 6.8 – 6.16).
Committee member	means a member of a Committee as defined in this Policy
Compass	Compass Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (Cth)) and as a charity with the Australian Charities and Not-for-profit Commission (ACNC) .
Complainant	Person with a Complaint ongoing with HOME in PLACE.
Complaint	Complaint is a generic term referring to the expression of dissatisfaction, orally or in writing, about the service or actions of the HOME in PLACE or its employees. A complaint is not a question, an enquiry or a request for information or review; unless the person specifies that they wish to make a complaint.
Compliment	<p>A compliment is an expression of satisfaction about HOME in PLACE’ staff, services or contractors on a specific occasion or relating to a particular matter. However, a compliment may also be in relation to a general feeling of satisfaction with HOME in PLACE due to the service you have received over a period of time.</p> <p>Compliments provide relevant workplace examples that can be used in HOME in PLACE’ client service training.</p>
Customer Satisfaction	A Customer’s perception of the degree to which the customer’s requirements have been fulfilled.
Director	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 .
Eligible Whistleblower:	Is a director, current and former company officers, employees, volunteers, partners and their staff. Associates and specified family members and other external parties, such as program beneficiaries, tenants and members of the public who attempts to make or wishes

Term	Definition
	to make a report about reportable conduct under this policy and avail themselves of the protections offered by this policy related to HOME in PLACE or a related body corporate. An eligible whistleblower can only be an officer, employee, associate or supplier (and the supplier's employees) of an Australian incorporated company or foreign company registered in Australia.
Executive Manager	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.
Feedback	Feedback includes complaints, compliments and suggestions for improvement about a particular service, experience or event – not simply a statement of overall opinion about HOME in PLACE services.
HOME in PLACE	HOME in PLACE Housing Services Co. Ltd. Trading as HOME in PLACE and includes its related body corporate (as defined by section 9 of the <i>Corporations Act 2001</i> (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.
HOME in PLACE (New Zealand)	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
HOME in PLACE Group	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.
Independent contractor	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.
Officer	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
Other personnel (NDIS-SDA)	The National Standards for Disability Services defines 'Other personnel' as those who: <ul style="list-style-type: none"> • Are not employed or otherwise directly engaged by the registered NDIS provider; e.g.: generally, employees, volunteers, consultants and contractors directly engaged by the provider would be considered workers. • Perform work at the premises of, or otherwise as part of the provision of supports and services to any person with disability by, the registered NDIS provider. This is generally under a commercial arrangement and would include other service providers, labour hire, subcontractors etc.
Parent Board	The current directors of HOME in PLACE.
Parent Company	HOME in PLACE

Term	Definition
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) ¹
Safeguarding	Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds. ¹
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.
Suggestion for Improvement	Suggestions about services provided by HOME in PLACE and how these may be improved.
User	any person or entity that use HOME in PLACE Information or ICT Assets.
Worker	<p>HOME in PLACE has adopted a modified version of SafeWork NSW definition of a 'worker' where the term is used in policy.</p> <p>The definition of a 'worker' for HOME in PLACE includes any person who is an Officer under the Corporations Act 2001 or who carries out work for a 'person conducting a business or undertaking' (PCBU – includes employers).</p> <p>The term 'Worker' includes any person who works as an:</p> <ul style="list-style-type: none"> • Employee, trainee or volunteer • outworker or apprentice • work experience student • contractor or sub-contractor • employees of a contractor or sub-contractor • employee of a labour hire company assigned to work for a PCBU. <p>For clarity Directors, Committee and Advisory Group members are listed separate from Workers in this document.</p> <p>In the context of this policy, the term 'Worker' also includes any person defined by the National Standards for Disability Services as 'Other personnel' (see definition below).</p>
Worker (HOME in PLACE)	<p>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) 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:</p> <ul style="list-style-type: none"> • 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

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>

Term	Definition
	<ul style="list-style-type: none"> 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)	<p>A worker is defined as an individual:</p> <ul style="list-style-type: none"> who <ul style="list-style-type: none"> 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.

End of Document.