

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 and enquiries including the gathering of information related to complaints and the way in which they are stored and logged are important requirements in meeting our standards under Home in Place CHAR-003 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 and enquiries are addressed effectively, promptly and fairly.

Home in Place Complaint and Enquiry Handling Procedure outlines how we manage, record, resolve and respond to complaints and enquiries.

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 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-028-02 Workplace Grievance Policy.
- 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 and Enquiries received from the Registrar for Community Housing are managed in accordance with Section "Registrar for Community Housing Complaint" of this Procedure.
- Appeals about decisions made by Home in Place are dealt with in Home in Place POL-001 Appeals and Internal Review 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 procedure however the Home in Place POL-003-02 Child Safeguarding Policy and Home in Place PROC-012-02 Child Friendly Complaint Handling Procedure contain 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 the Home in Place POL-003-03 People with Disability Safeguarding Policy.pdf contains additional requirements.

3. Procedure

Home in Place is committed to tenants', applicants', members of the community and/or other stakeholders' rights and will provide an effective complaints procedure that benefits the tenant, applicant, member of the community and/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

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

It is noted that Home in Place can only act on the Breaches of the Residential Tenancy Agreement for which appropriate action will be taken in accordance with Anti-Social Behaviour Policy and Procedure. Refer to Home in Place POL-025-04 Management of Antisocial Behaviour Policy and Home in Place PROC-

006 Management Antisocial Behaviour Procedure for information about managing anti-social behaviour, neighbour disputes, nuisance and annoyance.

Ministerial Enquiries

Enquiries which are made directly to Home in Place by way of Ministerial correspondence or contact are managed by the Group Executive Manager Governance or their representative. These complaints are responded to according to the allocated timeframe and appropriately actioned within 24 hours from the time a request for information by the Minister is received by Home in Place. A ministerial enquiry would be received, acknowledged and recorded in Greentree using an **Operations Service Request / Problem Code: Op.Ministerial**

Registrar for Community Housing Complaint

From time to time the Registrar may receive 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 Group Executive Manager Governance as delegated by the Group Managing Director. When a complaint from the Registrar is received it is lodged in the Home in Place online system for compliance, incident and risk management.

Local Member of Parliament (MP) Complaints

These complaints are acknowledged, investigated and responded to by the Executive Manager of the campus who manage the tenancy. An MP complaint would be recorded in Greentree using an **Operations Service Request / Problem Code: Op.MP Enquiry**

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 POL-019 Privacy Policy. 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)¹.

Where there has been a notifiable data breach an incident report will be lodged via Home in Place online compliance, incident and risk management system in accordance with Home in Place POL-036 ICT Breach Management Policy.

Complaints including Allegations of Fraud, Corruption or Misconduct

The Group Chief Financial 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 and actioned in accordance with Home in Place POL-005-04 Fraud and Corruption Policy, PROC-033 Investigation Procedure. The person responsible for managing the complaint is responsible for lodging the incident form.

¹ <https://www.oaic.gov.au/privacy/privacy-complaints>

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. The words “Anti-Discrimination” should be included in the Summary field of the SR **Complaint Service Request / Problem Code: Complaint.ServDelivery**

These complaints are also lodged via the incident and risk management database as a Notice to Management - NTM and referred to the Chief Operating Officer (COO) for investigation. The outcome of the investigation with a response letter is provided to the Complaints officer and responded to by the Governance unit as delegated by the Group Managing Director.

The reference should be recorded in the solution field of the complaint SR.

Complaint regarding breach of ACFID Code of Conduct

Home in Place is committed to adhering to the ACFID Code of Conduct². 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/code-of-conduct/complaints/>

Contact for Complaints

Any person in Australia, or from countries where work is being conducted by Home in Place representatives, 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 Manager, complimentsandcomplaints@homeinplace.org or posted to Home in Place Complaints Officer, P O Box 58, WICKHAM NSW 2293 and given to the Governance Administration Officer.

The Governance Administration Officer will arrange an acknowledgement letter to be issued to the complainant. If the complainant has any queries or would like information about the complaint progress or Home in Place complaints process, they may contact Home in Place by telephone on 1300 333 733 and request to speak to the Home in Place Governance Administration Officer alternately, they may email complimentsandcomplaints@homeinplace.org

Managing a Complaint

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:

² <https://acfid.asn.au/code-of-conduct>

#	Phase	GreenTree Status of SR
1	Receive and Record	C1.Receipt of Complaint
		C2.Acknowledge
2	Assess and Prioritise	C3.Investigate and Review
3	Investigate, Document and Action	
4	Outcomes and System Improvement	
5	Monitoring Effectiveness and Reporting	C5.Complaint Investigation Finalised
		C6.Send to Complaints Officer for Review
		C7.Complaint Reviewed and Finalised

1. Receive and Record

The primary function of receiving /recording a complaint is to ensure that the complainant receives acknowledgement that their complaint is being addressed and it is recorded in Greentree and, if required, the incident, risk, compliance and Information system 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 NG-119 Complaint Service Request Navigation Guide. The record created is known as a **Complaint Service Request (SR)**. Refer to Annexure 3 of this Procedure.

- **Available mediums to lodge a complaint:** A complaint can be lodged with Home in Place via any mode of communication. Examples include:
 - Telephone [1300 333 733](tel:1300333733)
 - Writing Hand delivered to a Home in Place Branch or posted to:
Attn: Home in Place Complaints Officer
PO Box 58, WICKHAM NSW 2293
 - Email complimentsandcomplaints@homeinplace.org
 - Via the website <https://homeinplace.org/complaints/>

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.

NOTE: When raising a Complaint SR in GreenTree, the user should assign the complaint status as “C1.Receipt of Complaint” this will ensure the Complaint SR appears in the Complaints Officer’s “SR’s For My Action” on their Greentree desk.

- **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 (either by post or via email). Should the complaint be received in person or over the phone, the person taking the complaint i.e., the Customer Service Officer (CSO) should request contact details from the complainant (including a phone and/or email/postal address). The complaint will be lodged and documented in Greentree and a reference 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.

NOTE: The Complaints Officer will acknowledge the complaint and issue a letter of receipt to the complainant, either by post or via email (**NOTE** copies of template letters are located on the L-Drive). At this stage of the Complaint Handling Process, the SR Status in GreenTree is “C2.Acknowledge”

Following the acknowledgement of the complaint, the Complaints Officer will assign the Complaint SR to the appropriate Manager (Executive/Group/General) in GreenTree and update the status of the SR To “C3.Investigate and Review”. The Complaint SR will now appear in the user’s Action Items on their GreenTree desk.

- **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 collection and 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, email, and best contact number
- identifying whether they are a Home in Place tenant, resident, applicant, support/authorised person 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 Home in Place 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:

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) or Executive Manager may assign the investigation to an appropriate officer; however, the GEM or Executive Manager must sign off on the outcome of the complaint.</p>

3. Investigate, Document and Action

Investigating

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 and if required in for Registrar Enquiries. Any relevant documentation / evidence that has been gathered should be scanned/saved 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 drafted.

NOTE: template letters for written responses are accessed from within the Complaint SR in Greentree and navigating to SharePoint.

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.

NOTE: During the review process, consideration should be given to what remedy and systems improvement may be required. The Executive Manager will review the outcome of the complaint and draft a response letter. 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 via the attachments field in the right-hand menu.

The Complaint Service Request status can now be changed to "C5.Complaint Investigation Finalised"

The response letter for Ministerial and registrar Enquiries must be written in a factual professional manner and attached to either the Ministerial Service Request or the Event.

Where possible the complainant should also be advised of the resolution via telephone by the Executive Manager responsible. Telephone contact however does not eliminate the requirement to provide a written response (via post or email) which is sent by the Complaints officer.

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 21 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, however will not exceed a period of 42 Days. 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 according to the allocated timeframe and appropriately actioned within **24 hours** from the time a request for information by the Minister is received by Home in Place by way of assigning a follow-up to the appropriate Executive Manager to request information on required questions. A ministerial complaint coming from the Minister will be deemed received on the date the Minister forwards the complaint to Home in Place.

Once the Executive Manager has responded to the required questions the Governance Unit will draft a response and respond in writing.

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 draft resolution response is reviewed by the Complaints Officer to determine all aspects of the complaint have been investigated/addressed and relayed satisfactorily to the complainant. As previously mentioned, the resolution letter should address:

- Acknowledgement
- Apology
- Answers
- Action

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 in NSW
- The Queensland Civil and Administrative Tribunal (QCAT) for disputes relating to Residential Tenancy Agreements in Queensland.

- The Victorian Civil and Administrative Tribunal (VCAT) for disputes relating to Residential Tenancy Agreements in Victoria.
- The Tenancy Tribunal for disputes relating to Tenancy Agreements in New Zealand.
- 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

NOTE: Once the Complaints Officer is satisfied that the complaint has been responded to adequately, they will issue a copy of the final Closing/Resolution letter to the complainant. A copy of the final letter and/or email sent should be attached to the Complaint SR. A solution is selected from the drop-down menu and a Solution Summary is added to the Complaint SR. The status is then changed to “C6.Send to Complaints Officer for Review”

The Group Executive Manager Governance conducts a final review of the complaint, ensuring all relevant information is documented. Once satisfied that the complaint can be finalised, they update the status of the SR to “C7.Complaint Reviewed and Finalised “

Finalisation Ministerial Request

The Governance Unit will forward the Ministerial Response on behalf of the Chief Operating Officer (COO) and ensure all documentation including responses and approvals are attached to the Service Request in Greentree.

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 Governance Administration Officer.

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 Governance Unit.

Based on the quarterly analysis, the Governance Administration Officer 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

Role	Responsibilities
Group Executive and Executive Management	<p>Group Executive and Executive Management are responsible for the following;</p> <ul style="list-style-type: none"> • Ensuring that the complaints management process and objectives are established within Home in Place; • Ensuring that the complaints management process is planned, designed, implemented, maintained and continually improved in accordance with the complaints management policy of the organisation; • Identifying and allocating the management resources needed for an effective and efficient complaints management process; • Ensuring the promotion of awareness of the complaint's management process and the need for a customer focus through Home in Place; • 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; • Appointing a complaints management representative and clearly defining his or her responsibilities and authority in addition to the responsibilities and authority set out below;

Role	Responsibilities
Group Executive Manager Governance	<ul style="list-style-type: none"> Ensuring that there is a process for rapid and effective notification to top management of any significant complaints; Periodically reviewing the complaints management process to ensure that it is effectively and efficiently maintained and continually improved. Closing out of complaints Establishing a process of performance monitoring, evaluation and reporting; Reporting to top management on the complaint's management process, with recommendations for improvement; <p>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</p>
Governance Administration Officer	<p>The Governance Administration officer is responsible for the following:</p> <ul style="list-style-type: none"> Triaging of complaints received Follow up of complaints investigation Review of complaints close out letters Administration of the complaint's procedure and process Administration of complaints in Greentree and Notification to complainant of outcome of complaint Upon resolution of complaint, forwarding via Greentree process to Group Executive Manager Governance for review and closure Regular monthly and quarterly reports as required
Other managers	<p>Other managers involved in the complaint's management process should, as applicable within their area of responsibility, be responsible for the following:</p> <ul style="list-style-type: none"> Ensuring that the complaints management process is implemented; Liaising with the complaint's management representative; Ensuring the promotion of awareness of the complaint's management process and of the need for a customer focus; Ensuring that information about the complaint's management process is easily accessible; Reporting on actions and decisions with respect to complaints handling; Ensuring that monitoring of the complaint's management process is undertaken and recorded; Ensuring that action is taken to correct a problem, prevent it happening in the future, and that the event is recorded; Ensuring that complaints management data are available for the executive management review.
Frontline Workers	<p>All Workers in contact with clients and complainants are to:</p> <ul style="list-style-type: none"> Be able to take a client or stakeholder complaint; Comply with any complaints management reporting requirements determined by Home in Place; Treat clients and stakeholders in a courteous manner and promptly respond to their complaints or direct them to the appropriate individual, and; Show good interpersonal and good communication skills.
All Workers	<ul style="list-style-type: none"> Be aware of their roles, responsibilities and authorities in respect of complaints; Be able to record a complaint or enquiry in accordance with Home in Place policies and procedures; Be aware of what procedures to follow and what information to give to complainants, and; Report complaints which have a significant impact on the organisation.

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.

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, Office of the Group Managing Director 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 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

- CHAR-003 Client Service Charter
- POL-001 Appeals and Internal Review Policy
- POL-003-02 Child Safeguarding Policy
- POL-003-03 People with Disability Safeguarding Policy
- POL-005-03 Whistleblower Policy
- POL-005-04 Fraud and Corruption Policy
- POL-012_Complaint Handling Policy
- POL-019 Privacy Policy
- POL-020 Dealing with Difficult and Challenging Behaviours Policy
- POL-025-04 Management of Antisocial Behaviour Policy
- POL-028-02 Workplace Grievance Policy
- POL-028-05 Workplace Bullying Discrimination and Harassment Policy
- POL-035-01 Records Management Policy
- POL-035-01-1 Records Management Policy - Schedule 1
- POL-036 ICT Breach Management Policy
- PROC-002 Appeals Management Procedure
- PROC-006 Management Antisocial Behaviour Procedure
- PROC-008 People with Disability Safeguarding Procedure
- PROC-011 QMS Documents (Policy and Procedure) Management Procedure
- PROC-012-02 Child Friendly Complaint Handling Procedure
- PROC-020 Dealing with Difficult and Challenging Behaviours Procedure
- PROC-033 Investigation Procedure
- FOR-101 Complaints Form NSW
- FLOW-012-01 Complaint Handling Flowchart
- FLOW-012-04 Receiving a Complaint Flowchart

Related legislation/standards

NATIONAL

- [ACFID Code of Conduct](#)
- [Privacy Act 1988 \(legislation.gov.au\)](#)

NEW SOUTH WALES

- [Anti-Discrimination Act 1977](#)

QUEENSLAND

- [Anti-Discrimination Act 1991](#)

VICTORIA

- [Equal Opportunity Act 2010](#)

WESTERN AUSTRALIA

- [Equal Opportunity Act 1984](#)

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
Antisocial Behaviour	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.
Appeals	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;
Associate	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.
Client	<ul style="list-style-type: none"> • 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.
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	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.
Complaints	An expression of dissatisfaction with an aspect of the services provided by Home in Place where the complainant is unhappy with the standard or type of service. Types of Complaint include: <ul style="list-style-type: none"> • 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.

Term	Definition
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 1993 Part 1 Section 2 Interpretation .
Employee	A person engaged under an employment agreement or award by any company in the Home in Place Group.
Enquiry	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.
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.
Home in Place	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)). 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.
Neighbour Dispute	Involves 2 or more neighbours that disagree on issues such as behaviour of tenants, noise, fences, trees, car parking, visitors or pets.
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 1993 Part 1 Section 2 Interpretation in New Zealand
Parent Board	The current directors of Home in Place.
Parent Company	Home in Place
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. ³
Partnership	An ongoing working relationship where risks and benefits are shared (Partnership Brokers Association) ³
Risk	Involves the probability of minimal / reasonable / serious or significant damage or liability to the complainant, department or engaged service provider.

³ 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
Service Request (SR)	A <u>service request</u> 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) 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: <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 • 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: <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.
Worker (Home in Place WA)	Worker is defined under the Western Australia Work Health and Safety Act 2020 – Selected terms (sections 4-8) as any person who carries out work for a PCBU, including work as an employee, contractor, subcontractor, self-employed person, outworker, apprentice or trainee, work experience student, employee of a labour hire company placed with a 'host employer' and volunteers.

'End Document.'