

Complaint, Compliment and Feedback Handling Policy

1. Purpose

HOME in PLACE is committed to the provision of a robust system for managing feedback from clients and stakeholders. This policy outlines HOME in PLACE's approach to handling complaints, compliments and feedback and underscores our commitment to supporting individuals affected by complaints and upholding the dignity and welfare of all individuals involved in our processes.

HOME in PLACE acknowledges its obligations under the National Disability Insurance Scheme (NDIS) Practice Standards and the NDIS (Complaints Management and Resolution) Rules 2018.

This policy ensures that NDIS participants, their families, carers, advocates and nominees are supported to provide feedback or make a complaint in a safe, accessible and fair manner, and that complaints relating to NDIS supports and services are welcomed, managed effectively and used to inform continuous improvement.

The purpose of this policy is to ensure HOME in PLACE:

1. Provides a clear and transparent process for clients and stakeholders to provide feedback.
2. Manages Complaints, Compliments and Feedback efficiently and fairly.
3. Supports individuals affected by complaints.

For the purpose of this policy, the following definitions apply:

Term	Definition
Complaint	An expression of dissatisfaction related to HOME in PLACE's service delivery, staff, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected. ¹
Compliment	An expression of praise, commendation, respect, or regard related to HOME in PLACE's services or the delivery of services by an employee of HOME in PLACE.
Feedback	Feedback refers to general comments or opinions from customers or stakeholders related to opportunities to continually improve our service and/or processes.

2. Scope

A compliment, complaint and/or feedback, including anonymous complaints, may be made by a person to whom HOME in PLACE deliver services or who may be affected by our service delivery. This includes tenants, applicants, NDIS participants, families, carers, advocates, nominees service providers and other stakeholders

¹ Definition adopted from <https://nrsch.gov.au/providers/guidance-and-policy/complaints-management-policy.html>

in relation to our Workers, Partners, Associates, and anyone else acting on behalf of a member of the HOME in PLACE.

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-028-02 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 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 and Internal Review Policy.

The process for handling complaints made by a child / minor or complaints from people with disability, families, carers, service providers may be generally managed in accordance with this policy however refer to the following for more information:

- HOME in PLACE POL-003-02 Child Safeguarding Policy
- HOME in PLACE PROC-012-02 Child Friendly Complaint Handling Procedure
- HOME in PLACE POL-003-03 Safeguarding People with A Disability Policy

Compliments are managed in accordance with PROC-012-01 Complaint Compliment and Feedback Handling Procedure.

3. Policy Statement

HOME in PLACE recognises the importance and value of listening and responding to feedback and complaints and is 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.
- Providing fair and just review of its services and decisions to tenants, applicants, residents, families, carers, partners, workers, and other stakeholders.
- 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.

Meeting it's obligations as a registered NDIS provider by ensuring that feedback and complaints from NDIS participants are handled in a way that upholds participant rights, promotes choice and control, and supports safety, dignity and wellbeing.

HOME in PLACE recognises that effective management of feedback, including compliments and complaints, is fundamental to the provision of quality service and is one of the most important ways for identifying continuous improvement opportunities and reforming policies and procedures.

HOME in PLACE Complaints and compliments handling process is managed by the Group Executive Manager Governance (GEMG) and administered by the Governance Administration Officer. For information relating to other Roles and Responsibilities within the Complaint Management Process refer to HOME in PLACE PROC-012-01 Complaint Compliment and Feedback Handling Procedure (*3.4 Complaint Management Process – Responsibilities*).

HOME in PLACE registers all Compliments and complaints and maintains an Electronic Complaints Register. GreenTree is the primary tool for the electronic collection of this information, although HOME in PLACE incident and risk reporting system is used for managing Compliments, 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. Records of complaints relating to NDIS supports and services, including actions taken and outcomes, will be retained for a minimum of seven (7) years in accordance with the NDIS (Complaints Management and Resolution) Rules 2018 and HOME in PLACE records management requirements.

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 Compliment and Feedback 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 number of escalated complaints.

3.1 Identifying Complaints

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

For information on how to classify Complaints in the Electronic Complaints Register, refer to HOME in PLACE PROC-012-01 Complaint Compliment and Feedback Handling Procedure (*3.3 Procedure, Types of Complaints*).

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; tenancy matters; or matters that appear to be frivolous, vexatious, misconceived or lacking in substance. Examples include:

- Frivolous or Vexatious Complaints
- Complaints involving other Organisations and/or their personnel.
- Reviewable or Appealable Decisions

Refer to HOME in PLACE PROC-012-01 Complaint Compliment and Feedback Handling Procedure for detailed information on complaints HOME in PLACE will not action.

Complaint Types

- Anonymous Complaints
- Client satisfaction with the complaint handling process
- Property maintenance including quality of repairs and conduct of trades
- Complaints from neighbours (including HOME in PLACE tenants and private neighbours)
- Complaints relating to tenancy matters
- Complaints relating to termination of tenancies
- Complaints from tenants regarding their housing needs
- Complaints from tenants or applicants regarding housing allocations and eligibility
- Complaints where a third party has been adversely affected by the service delivery or actions of HOME in PLACE
- Complaints from Children/Minors
- Ministerial Complaints
- Repeat complaints where a previous complaint has been closed/resolved
- Complaints regarding safety and / or security concerns
- Local Member of Parliament (MP) Complaints
- Registrar for Community Housing Complaint
- Complaints including allegations of Fraud, Corruption or Misconduct
- Complaints including allegations of a Breach of Privacy
- Complaints including allegations of Anti-Discrimination
 - Complaints regarding the administration or use of Centrelink services, including Centrepay, Centrelink Confirmation e-Services (CCeS) – Income Confirmation and Electronic Verification of Rent (EVoR)

Centrelink Related Complaints

Home in Place uses several Services Australia programs, including Centrepay, Centrelink Confirmation e-Services (CCeS) – Income Confirmation and Electronic Verification of Rent (EVoR). A complaint is considered a Centrelink related complaint when it concerns our administration or use of these programs.

Complaints relating to Home in Place's use of these programs will be managed in accordance with this policy, with privacy-related matters handled under the Privacy complaint category and potential program non-compliance escalated to the Governance unit. In line with Centrepay Terms of Use, Home in Place will aim to resolve Centrepay complaints within 20 business days. Customers may also raise concerns directly with Services Australia, and Home in Place will cooperate with any review or audit.

Refer to HOME in PLACE PROC-012-01 Complaint Compliment and Feedback Handling Procedure for detailed information on complaints types.

3.2 Principles

HOME in PLACE have adopted the following principles for our Complaint Handling Policy and Procedures²:

Principle		NRSCH Definition
i	Accessibility	Ensure that people are provided with appropriate assistance and representation as required to make complaints
ii	Communication and Responsiveness	Organisations should keep complainants informed of the status of their complaint and should clearly communicate the results of the complaint. Clearly specified timeframes should be communicated to complainants. Early communication can also be used to set realistic expectations around what the organisation can and cannot influence.
iii	No detriment	Take all reasonable steps to ensure people making complaints are not adversely affected by making a complaint. That no charge is applied to make a complaint.
iv	Objectivity and fairness	Each complaint should be treated in an objective and unbiased manner, including, for example providing review of complaint outcome with someone other than the original decision-maker
v	People focus	Everyone has the right to complain. Demonstrate a strong organisational commitment to a respectful people-focused and proactive approach to seeking and receiving complaints. This includes, wherever possible, actively including complainants in the complaints process.
vi	Privacy and Disclosure	Personally identifiable information should be managed and only be disclosed in compliance with obligations under privacy legislation
vii	Visibility and Transparency	Ensure all people have easily available information about how and where a complaint can be made.
viii	Staff and Culture	Ensure that frontline staff are well trained, supervised and resourced in the management of complaints.
ix	Continuous Improvement	Incorporating complaints management into the continuous improvement cycle for HOME in PLACE is the most efficient and effective mechanism to embed good practice.

i. Accessibility:

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

²

https://nrsch.gov.au/documents/publications/Complaints_Management_Framework_for_Community_Housing_Providers_2022.pdf

availability of interpreters, cross-culturally trained staff, and accessibility requirements for people with disability) as required; and

- HOME in PLACE will adopt a child friendly approach to receive and deal with complaints from children.

For NDIS participants, HOME in PLACE will provide accessible complaint information and supports, which may include:

- Easy Read or plain-language information;
- Communication aids or assistive technology;
- Supported decision-making assistance;
- Assistance from an advocate, nominee or support person; and
- Interpreters, Auslan services or culturally appropriate supports where required.

Refer to HOME in PLACE POL-003-02 Child Safeguarding Policy, HOME in PLACE PROC-012-02 Child Friendly Complaint Handling Procedure for additional requirements on managing child complaints.

ii. Communication & Responsiveness

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.

Refer to HOME in PLACE PROC-012-01 Complaint Compliment and Feedback Handling Procedure for Complaint contact details.

Complainants are to be treated courteously and be kept informed of the progress of their complaint through the complaints-handling process.

- HOME in PLACE will respond to a complaint according to our predetermined timeframes.
- The complainant will receive an acknowledgement/letter of receipt (inclusive of a reference number).
- 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 with 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 21 days of HOME in PLACE receiving the complaint unless there are multiple or complex issues.
- More complex complaints and complaints with multiple issues will receive an initial response within 21 days and a final response as soon as possible thereafter generally no later than 42 days after the complaint was lodged. If more time is needed, the complainant will receive an update at 42 days 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 POL-052 SDA Incident Management and Reportable Incidents Policy.

iii. No Detriment

HOME in PLACE will take all reasonable steps to ensure that people making complaints are not adversely affected by doing so.

In particular, no NDIS participant will experience any form of reprisal, discrimination, intimidation, loss of supports, or adverse change to services as a result of making a complaint.

HOME in PLACE will continue to provide NDIS supports during the complaint process unless there is a legitimate and immediate safety risk that requires alternative arrangements.

Access to the complaint handling process is free of charge to complainants. Complaints can be made anonymously if a Complainant feels they may be adversely affected by disclosing their identity.

iv. Objectivity and Fairness

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.

- HOME in PLACE will liaise with Workers, Partner, Associates, stakeholders, and external parties without prejudice and will remain respectful of diversity.

v. People Focus

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.

vi. Privacy & Disclosure

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.

For NDIS participants, information will only be shared where required to investigate and resolve a complaint or where required by law, including reporting obligations to the NDIS Quality and Safeguards Commission.

HOME in PLACE will observe strict confidentiality in complaint handling:

- 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 is unable to disclose details of complaints regarding their tenants as this would breach our obligation to uphold our tenant's privacy.

NOTE: If a complaint is received from the Local Member of Parliament or the Tenancy Advocate, authority to act is assumed.

vii. Visibility and Transparency

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 (SDA), information relating to HOME in PLACE's complaints process is available to all Supported Independent Living providers.
- Information on how to make a complaint or Compliment 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.

viii. NDIS Participants Right to Make a Complaint

HOME in PLACE ensures that NDIS participants are informed of and supported to exercise their right to make a complaint.

NDIS participants may choose to:

- Make a complaint directly to HOME in PLACE, or
- Make a complaint directly to the NDIS Quality and Safeguards Commission at any time, with or without first using HOME in PLACE's internal complaints process.

HOME in PLACE will not require an NDIS participant to exhaust internal complaints avenues before contacting the NDIS Quality and Safeguards Commission.

NDIS Quality and Safeguards Commission contact details:

- Phone: 1800 035 544
- Website: <https://www.ndiscommission.gov.au>

ix. Staff and culture

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.
- At all times, HOME in PLACE will act in accordance with related legislation.

Training and Awareness:

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.

x. Continuous Improvement

HOME in PLACE is committed to continually improving the effectiveness and efficiency of the compliment and complaint 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.

Complaints and feedback from NDIS participants are analysed to identify opportunities to improve participant safety, quality of supports, choice and control, and service delivery outcomes. Trends and insights are used to inform continuous improvement activities, management review and quality planning.

Analysis and Evaluation of Complaints

All complaints will be classified and assessed as per the Complaint Handling Procedures and data 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.

4. Definitions and Acronyms Glossary

For clarification of any definitions or acronyms contained within this document, please click on the [Glossary](#) for information.

'End of Document.'