

Complaint Compliment and Feedback 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; and
- 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's (Australia) Limited management of complaints, compliments and feedback, including the gathering of information related to feedback, and the way in which such data is 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 feedback are addressed effectively, promptly, and fairly.

HOME in PLACE Complaint, Compliment and Feedback Handling Procedure outlines how we manage, record, resolve and respond to complaints and feedback.

This Procedure supports HOME in PLACE's obligations as a registered National Disability Insurance Scheme (NDIS) provider under the NDIS Practice Standards and the NDIS (Complaints Management and Resolution) Rules 2018.

It applies to complaints, compliments and feedback relating to NDIS supports and services, including Specialist Disability Accommodation (SDA), and ensures that NDIS participants are supported to raise concerns in a safe, accessible and fair manner.

2. Scope

This procedure applies to any feedback, including anonymous complaints, regardless of who makes it. This includes tenants, applicants, NDIS participants, families, carers, advocates, nominees, service providers and other stakeholders, except for matters excluded under Complaints HOME in PLACE will not action.

3. Procedure

HOME in PLACE recognises the importance and value of listening and responding to feedback and complaints and is committed to:

- The rights of tenants to respectful, fair, and non-discriminatory treatment;
- The provision of safe and secure housing;
- Upholding the privacy of tenants, clients and stakeholders;
- Protecting personal information;
- Providing a transparent process for clients and stakeholders to provide feedback; and
- Providing access to complaints and appeals processes.

3.1 Context

The following definitions (adopted from the [NRSCH Complaints Management Framework](#)) are provided to assist with categorising enquiries/feedback received to determine the most appropriate course of action.

Complaint Process Definitions

Term	Definition
Appeal	An appeal is a request for a review of a decision that impacts on a client's housing. This includes decisions relating to eligibility, offers of accommodation, rent assessment, transfers, pets or tenant charges.
Complainant	Person, organisation, or representative making a complaint.
NDIS Participant	A person who is a participant in the National Disability Insurance Scheme and receives supports or services from HOME in PLACE, including Specialist Disability Accommodation.
Complaint	A complaint is 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. Complaints can be made to HOME in PLACE by tenants, applicants or other third parties on their behalf or other people affected by the HOME in PLACE's service delivery.
Disputes	Unresolved complaints escalated internally or externally.
Feedback	Feedback refers to opinions or comments, positive or negative, given to HOME in PLACE about its services. Feedback received, either positive or negative, should be acknowledged and the person providing the feedback thanked for taking the time to share their opinions as it assists HOME in PLACE's continuous improvement efforts. Feedback should be directed to the relevant manager and/or team member to acknowledge outstanding services and/or identify areas for improvement.
General Enquiry	A general enquiry is a request for information. Enquiries may come from tenants, applicants or other third parties on their behalf. Enquiries may also come from members of the community, clients, stakeholders, partners and other external third parties.
Service Request	A request for service is where tenants, applicants or other third parties on their behalf, contact HOME in PLACE, to ask for something. This could be to request maintenance work or to request a transfer application form. Staff receiving these requests for service have a key role in categorising Service Request and forwarding to the appropriate team for follow up. Requests for service can escalate into complaints where the assigned team/team member does not satisfactorily manage the request in a timely manner or where communication is poor.
Tenancy Issue	Tenancy issues are issues raised by tenants or other community members about their neighbours or neighbourhoods. This includes issues such as neighbour disputes, noise, vandalism, or accusations of anti-social behaviours. These are not considered to be complaints as they do not relate to dissatisfaction with HOME in PLACE's services. However, a tenancy issue can result in HOME in PLACE assisting in resolving the matter.

An enquiry or feedback (initially defined by any of the terms noted above) may be defined as a complaint if a previously reported issue has not been dealt with, in the first instance, in a satisfactory manner.

It is noted that if feedback is received and the person providing the feedback explicitly states that they wish to make a 'formal complaint', the feedback must be recorded as per the Complaints Handling process, regardless of how it may have been categorised otherwise. Tenancy issues may become complaints when the person(s) reporting the issue is not satisfied with how a HOME in PLACE has handled the issue in the first instance.

NDIS Participants Making 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.

NDIS participants are not required to exhaust HOME in PLACE's internal complaints processes 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>

Complaint Priority Levels

Low priority Complaint	Moderate priority Complaint	High priority Complaint
• 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.	• 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.	• 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.
Low priority complaints would usually be handled by an Executive Manager, or delegate. The Executive Manager may assign the investigation to an appropriate officer; however, the Executive Manager must sign off on the outcome of the complaint.	Moderate priority complaints would usually be handled by an Executive Manager, or delegate. The Executive Manager may assign the investigation to an appropriate officer; however, the Executive Manager must sign off on the outcome of the complaint.	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.

3.2 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 and/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 Procedure, frivolous or vexations 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. Examples include:

Frivolous Complaints:

1. **Repeated Complaints with No New Evidence:** A tenant repeatedly complains about an issue that has already been thoroughly investigated and resolved.
2. **Trivial Issues:** Complaints about minor issues that do not significantly impact the tenant's living conditions.
3. **Unrealistic or Unreasonable Demands:** Complaints requesting actions that are not within Home in Place's power or responsibility, such as demanding that neighbours be evicted because they own a pet (when pets are allowed under the tenancy agreement).
4. **Complaints Based on Personal Dislike:** A tenant complains about another resident simply because they do not like them, with no legitimate concerns or breaches of tenancy involved.

Vexatious Complaints:

1. **Malicious Complaints:** Complaints made with the intent to harass, intimidate, or cause harm to another resident or staff member, such as repeatedly accusing a neighbour of illegal activities without any evidence.
2. **Complaints with No Genuine Basis:** Complaints that are entirely fabricated or exaggerated, such as falsely claiming that the landlord has breached tenancy laws to manipulate or gain an unfair advantage.
3. **Retaliatory Complaints:** A tenant makes a complaint in retaliation for a previous legitimate action taken by HOME in PLACE, such as being issued a warning for Breaching their Tenancy Agreement.
4. **Excessive Complaints:** A tenant lodges an excessive number of complaints, particularly about different issues, in a short period, with the apparent intent to overwhelm or burden HOME in PLACE's company's resources.

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, 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.

Complaints involving other Organisations and/or their personnel.

Complaints directed at another organisation, or their personnel will be referred to the concerned organisation. It is the responsibility of the organisation to address and resolve complaints according to their own established complaints handling policies and procedures.

Reviewable or Appealable Decisions

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

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 and Internal Review Policy for what is considered an appealable decision and 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).

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

3.3 Types of Complaints

Complaints Managed by the Complaint, Compliment and Feedback Handling Procedure

Complaint SR Types

Complaint SR Type	Description	GT Problem Code
Client Satisfaction	Complaints regarding dissatisfaction with how HOME in PLACE dealt with a complaint received and/or the Complaint Handling process.	Complaint.Satisfaction
Property Maintenance	Complaints regarding the service delivery specific to maintenance of assets, quality of repairs undertaken and timeframes to complete lodged service request. Examples may include: - Modification and/or maintenance requests - Quality of maintenance - Incomplete maintenance jobs - Issues with maintenance staff including conduct (including contractors) - Issues with maintenance related contact (including contact by trades engaged by HOME in PLACE)	Complaint.Maintenance

Complaint SR Type	Description	GT Problem Code
	<i>NOTE: If this is the first time the maintenance has been reported to HOME in PLACE, this will be referred to the Maintenance Team as Service Request (as noted in section 3.1).</i>	
Neighbour Complaints	Any complaint raised by a neighbour (either immediate or withing close proximity) of a HOME in PLACE tenant including private neighbours and other HOME in PALCE tenants. If the complaint relates to the Quiet Enjoyment and/or alleged Anti-Social Behaviour, this should be managed in accordance with the Management of Anti-Social Behaviour Policy & Procedure Neighbourhood Disputes and allegations of Anti-Social Behaviour. In the first instance.	Complaint.Neighbour
Rent/Water Charge/Tenant debt	Complaints relating to Tenancy matters including: • Rental calculations • Charging rent (rent subsidy) including calculation of rent subsidies; • Cancellation of rent subsidies; • Tenants eligibility for a rent subsidy; • Disputing costs and/or charges incurred by the tenant upon vacation of a dwelling; • Disputing charges incurred by the tenant during their tenancy i.e. maintenance charges; • Bond charges; • Water charges including grant of a water usage allowance as per HOME in PLACE policy.	Complaint.RentWatDebt
Termination of Tenancy/Eviction	Complaints related to Tenancy matters where the tenancy is terminated by HOME in PLACE: • Notice of termination; • Breach notices; • Eviction orders; • Warrants.	Complaint.TerminEvict
Housing needs	Complaints related to the housing needs of tenants including: • Transfer requests; • Succession of Tenancy requests; • Application for additional occupants; • Tenant support.	Complaint.HouseNeeds
Housing allocation	Complaints related to the specific needs of a tenant or applicant with regard to: • Housing application; • Application for priority housing; • Suitability of property offered; • Acceptance and/or withdrawal of housing offer.	Complaint.Allocation
Complaints about the HOME in PLACE (Provider)	Complaints where a third party has been adversely affected by the service delivery or actions of HOME in PLACE workers or persons engaged to carry out work on behalf of HOME in PLACE.	Complaint.ServDelivery
Complaints from a Minor	The Group Chief Executive Officer is appointed as HOME in PLACE Child Protection Incident Reporting Focal Officer who is responsible for overseeing all child complaint handling processes. <i>See below for further information relating to complaints made by children/minors.</i>	Complaint.FromChild

Complaint SR Type	Description	GT Problem Code
Ministerial	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.	Complaint.Ministerial
Repeat	Complaints where a previous complaint has been closed/resolved, however the same issue or concern has reoccurred. <i>Note: Multiple complaints made by a complainant regarding the same matter within 30 days are treated as one complaint. i.e. If the initial complaint has been closed and the same issues is raised within 30 days of the initial complaint being raised, the complaint SR is to be re-opened.</i>	Complaint.Repeat
Security / Personal Safety	A complaint regarding security or personal safety typically refers to a formal expression of concern or dissatisfaction raised by a resident or tenant regarding issues related to their safety or security within their housing environment. Examples include: • Physical Security: Concerns about the adequacy of locks, lighting, surveillance systems, or other physical security measures in the premises. • Safety Hazards: Complaints regarding potential hazards or risks within the housing complex, such as broken fixtures, unsafe staircases, or lack of emergency exits. • Response to Emergencies: Complaints about the effectiveness or timeliness of emergency response procedures, including access to emergency services or the responsiveness of property management.	Complaint.SafeSecure
Other	Any other complaints that are not defined by the above-mentioned complaint types. This includes Anti-Discrimination, Privacy, Allegations of Fraud, Corruption or Misconduct, breach of ACFID Code of Conduct, Centrelink related complaints about our administration or use of Centrepay, Centrelink Confirmation e-Services (CCeS) or Electronic Verification of Rent (EVoR), and Anonymous complaints. <i>NOTE: all complaints classified as 'Other' should state the issue in the Subject field of the SR in GreenTree. If a complaint type is managed outside of this procedure, this should be noted in the GreenTree SR including the platform and reference number.</i>	Complaint.Other

Anonymous Complaints

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

Anti-Discrimination Complaints

Anti-discrimination complaints are raised as a Complaint.Other (with the custom Reason = Anti-Discrimination) 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 Services as delegated by the Group Chief Executive Officer (GCEO).

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

Complaints Managed outside of the Compliment, Complaint and Feedback Handling Procedure

Neighbourhood Disputes and allegations of Anti-Social Behaviour

Neighbourhood disputes and difficulties, including accusations of anti-social behaviour, are covered by POL-025-04 Management of Antisocial Behaviour Policy & PROC-006 Management Antisocial Behaviour Procedure. Examples of neighbourhood disputes & anti-social behaviour may include, but are not limited to:

- Neighbour disputes
- Accusations of disruptive behaviour
- Reports of criminal behaviour
- Noise and nuisance
- Domestic violence

Complaints from Children/Minors

The Group Executive Manager Governance (GEMG) is appointed as HOME in PLACE Child Protection Incident Reporting Focal Officer who is responsible for overseeing all child complaint handling processes.

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

- Only HOME in PLACE staff who have a current Working with Children Check will be involved in dealing with complaints from children.

Compliance with Mandatory Reporting Requirements

HOME in PLACE will fully adhere to all mandatory reporting obligations. In specific circumstances, we are obligated to report incidents to relevant authorities, including law enforcement and or child protection agencies, DFAT or ACFID.

Local Member of Parliament (MP) Complaints

These complaints are acknowledged, investigated, and responded to by the Executive Manager (EM) 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

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 Group Executive Manager Governance as delegated by the Group Chief Executive Officer. When a complaint from the Registrar is received it is lodged in the HOME in PLACE online system for compliance, incident, and risk management.

Complaints including Allegations of Fraud, Corruption or Misconduct

The Group Chief Financial Officer (GCFO) is appointed as the HOME in PLACE Fraud Officer. Complaints of criminal aspects including allegations of fraud, sexual exploitation, abuse, harassment, corruption, misconduct and/or financial wrongdoing are required to be lodged via an incident form and referred to the GCEO 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.

HOME in PLACE will carefully assess the safety of reporting to authorities and will consider the preferences of Victims/Survivors and Whistleblowers.

Privacy Complaint

The Group Chief Technical Officer (GCTO) is appointed as the HOME in PLACE Privacy Officer. Privacy complaints are raised as a Complaint. Other SR in GreenTree. The words "Privacy" should be included in the Summary field of the SR Complaint Service Request. Privacy complaints are lodged via the Incident, Risk, Compliance, Information Platform and referred to the GCTO for investigation and action in accordance with HOME in PLACE POL-019 Privacy Policy.

A person may make a complaint if they feel their personal information has been handled inappropriately by HOME in PLACE. If a complainant is not satisfied with HOME in PLACE's 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's online compliance, incident and risk management system in accordance with HOME in PLACE's POL-036 ICT Breach Management Policy.

Centrelink Related Complaints

HOME in PLACE may receive complaints about our administration or use of Centrepay, Centrelink Confirmation e-Services (CCeS) – Income Confirmation or Electronic Verification of Rent (EVoR). These complaints must be managed in accordance with this Procedure and the specific obligations of our Services Australia agreements.

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

Examples include issues relating to incorrect or disputed Centrepay deductions, delays or errors in establishing or cancelling deductions, incorrect EVoR submissions, concerns about customer consent for CCeS or EVoR, or concerns about the handling or disclosure of Centrelink customer information.

Where a complaint involves the privacy, security or disclosure of Centrelink customer information (e.g., Customer Reference Numbers, income or rent verification information), it must be managed as a Privacy complaint in accordance with POL-019 Privacy Policy and referred to the Privacy Officer.

Where a complaint suggests potential non-compliance with Centrepay, CCeS or EVoR obligations, it must be escalated to the Governance Unit. The Governance unit will determine whether notification to Services Australia is required and coordinate any corrective or remedial action.

These complaints must be recorded in GreenTree under Complaint.Other – Centrelink, with reference to the relevant program (e.g. Centrepay, CCeS, EVoR). Centrelink related complaints should generally be classified as Medium or High Priority, and will be treated as High Priority where they involve privacy concerns, incorrect use of Centrelink information, systemic issues, or matters requiring notification to Services Australia.

In line with [Centrepay Terms of Use](#), Centrelink related complaints must be monitored to ensure they meet the twenty (20) business day resolution timeframe, unless complex. Any risk of delay must be escalated to the Governance unit.

Customers may also raise complaints directly with Services Australia. Where a complaint is referred to Home in Place by Services Australia, or where Services Australia initiates a review or audit, Home in Place will cooperate fully and promptly with these processes.

3.4 Complaint Management Process - Responsibilities

Role	Responsibilities
Group Executive Manager Governance	The Group Executive Manager Governance (GEMG) is appointment as the Manager responsible for the Complaints Handling process for HOME in PLACE. - Ensuring that there is a process for rapid and effective notification to top management of any significant complaints; - Ensuring that the complaints management process is planned, designed, implemented, maintained and continually improved in accordance with the complaints management policy of the organisation; - Periodically reviewing the complaints management process to ensure that it is effectively and efficiently maintained and continually improved; - Closing out of complaints; - Ensuring that Centrelink related complaints are escalated to Services Australia where required under Centrepay, Centrelink Confirmation eServices (CCeS) or Electronic Verification of Rent (EVoR) program obligations; - Establishing a process of performance monitoring, evaluation and reporting; - Reporting to management on the complaint's management process, with recommendations for improvement; - 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:

Role	Responsibilities
	Appointing a complaints management representative/Complaints Officer and clearly defining his or her responsibilities and authority in addition to the responsibilities and authority set out below.
Governance Administration Officer	The Governance Administration officer is responsible for the following: - Administration of the complaint's procedure and process including: - Triaging of complaints received; - Follow up of complaints investigation; - Review of complaints close out letters; - Administration of complaints in Greentree; - Notification to complainant of outcome of complaint; - Regular monthly and quarterly reporting in accordance with Company requirements.
Group Executive and Executive Management	Group Executive and Executive Management are responsible for the following; - Ensuring that the complaints management process and objectives are adhered to; - 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.
Other managers	Other managers involved in the complaint's management process should, as applicable within their area of responsibility, be responsible for the following: - 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.
Workers	All Workers, including frontline workers in contact with clients and complainants, are responsible for: - Being aware of their roles, responsibilities and authorities in respect of complaints; - Being familiar with HOME in PLACE Policy and Procedures regarding the complaints management process; - Being familiar with what information to provide to complainants and where this information is located; - Accepting a client or stakeholder complaint and recording a complaint or enquiry in accordance with HOME in Place policies and procedures; - Complying with any complaints management reporting requirements determined by HOME in PLACE; - Treating clients and stakeholders in a courteous manner and promptly responding to their complaints or direct them to the appropriate individual, and; - Communicating in a respectful manner without prejudice.

3.5 Receiving 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.

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 feedback@homeinplace.org

Where a complaint is received from an NDIS participant, or relates to NDIS supports or services, the worker receiving the complaint must inform the participant of their right to make a complaint directly to the NDIS Quality and Safeguards Commission.

Complaint Management Process

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:

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

3.5.1 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.

Employees are required to record complaint details within the Electronic Complaints Register 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.

Complaints are categorised according to the Complaint Types (noted in section 3.3 Complaints Managed by the Complaint Handling Procedure).

For information on how to manage different complaint & enquiry types, refer to FLOW-012-02 Complaint Receiving Flowchart.

NOTE: A complaint that covers multiple matters should be raised as a single complaint and recorded against the primary focus of the complaint.

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 feedback@homeinplace.org
- Via the website <https://homeinplace.org/complaints/>

For NDIS participants, HOME in PLACE will provide reasonable supports to enable complaints to be made, including:

- Easy read or plain language information;
- Use of communication aids or assistive technology;
- Supported decision-making assistance;
- Engagement of an advocate, nominee or support person;
- Interpreters, Auslan services or culturally appropriate supports, where required.

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.

NOTE: 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 or posted and given to the Governance Administration Officer.

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. 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.

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.

HOME in PLACE will ensure that NDIS participants are not subjected to reprisal, discrimination, intimidation, loss of supports, or adverse changes to services as a result of making a complaint.

NDIS supports will continue to be provided during the complaint process unless there is a legitimate and immediate safety risk requiring alternative arrangements.

No Detriment

HOME in PLACE will take all reasonable steps to ensure that no person is subjected to reprisal, discrimination, intimidation, disadvantage, or adverse treatment as a result of making a complaint, providing feedback, or raising a concern.

This includes, but is not limited to:

- Tenants and applicants;
- NDIS participants;
- Families, carers, advocates or nominees;
- Workers, contractors or other stakeholders.

For NDIS participants, HOME in PLACE will ensure that supports are not withdrawn, reduced or altered because of making a complaint. NDIS supports will continue to be provided during the complaint process unless there is a legitimate and immediate safety risk requiring alternative arrangements.

3.5.2 ASSESS AND PRIORITISE.

On raising a Complaint Service Request, a Complaint Priority Level 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.

NOTE: HOME in PLACE immediately escalates complex and/or High Priority complaints to our Group Chief Executive Officer (GCEO) or his/her delegate.

Where a complaint relates to an NDIS participant, consideration must be given to:

- Participant safety and wellbeing;
- Potential safeguarding concerns;
- Impact on the participant's current supports;
- Whether the complaint constitutes a reportable incident under NDIS requirements.

High-risk NDIS complaints must be escalated in accordance with HOME in PLACE safeguarding and incident management processes.

3.5.3 INVESTIGATE, DOCUMENT, ACTION

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.

All complaints relating to NDIS supports and services, including actions taken and outcomes, must be documented and retained for a minimum of seven (7) years in accordance with the NDIS (Complaints Management and Resolution) Rules 2018.

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;
- Interviewing neighbours and/ or other individuals affected by the incident being alleged;
- Reviewing relevant policies, procedures and/or legislation; and
- Reviewing previous complaints about the same issue.

When investigating complaints from NDIS participants, HOME in PLACE will ensure:

- Procedural fairness;
- That the participant is supported to understand the process;
- That reasonable adjustments are made to accommodate communication or decision-making needs;
- That participants are kept informed of progress and outcomes in an accessible format.

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 the SharePoint folder. As GreenTree is not able to navigate to a Cloud based folder, a copy of this folder will need to be Synced to your local computer. If you are unsure how to sync folder, reach out to helpdesk for assistance.

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

Complaint Type	Response Time
General Complaints	Complaints will be investigated as quickly as possible. Complaints that relate to a simple matter should be finalised within 21 days .
Centrelink Related Complaints	Complaints relating to Centrelink administered programs should be resolved, where practicable, within 20 business days, in accordance with Centrepay Terms of Use . Any risk of not meeting this timeframe must be escalated to the Governance Unit immediately.
Complex Complaints	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 (no more than 42 days). In these circumstances, the extended time for resolving the complaint will be communicated to the complainant.
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.
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.

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 the actions taken to resolve the complaint.

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 the complainant 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.
- The NDIS Quality and Safeguards Commission (for complaints related to NDIS supports and services, including 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 (GEMG) 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.

3.5.4 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;
- Worker training;
- Other professional development activity as recommended.

Examples of remedial action that may be appropriate and reasonable to remedy errors and deficiencies in service include:

- An explanation;
- A change in decision;
- Formal or informal dispute resolution;
- An apology;
- Written warning letter or notice to remedy breach; and
- Correction of any misleading or incorrect record

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.

3.5.5 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.

In accordance with HOME in PLACE reporting requirements, the Governance Administration Officer prepares a report based on analysis of complaints data for the reporting period, including:

- 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;
- Identified issues and trends for the period; and
- Recommendations for continuous improvement opportunities.

Complaints from NDIS participants are analysed to identify trends and opportunities to improve participant safety, quality of supports, choice and control, and service delivery outcomes.

Insights from NDIS complaints inform management review, staff training and continuous improvement activities.

3.6 Receiving Compliments

Positive feedback (a compliment) is received by clients as a way of showing their appreciation for the services they have received. Receiving positive feedback and recognising individuals for their work has proven to have a positive impact in the workplace by motivating people, boosting self-esteem and improving self-confidence.

It is important to recognise team members for a job well done. Compliments may be received by a variety of methods including:

- In person
- By email
- Written letter
- Post on Social Media

The Compliments Register is managed through HOME in PLACE's online Incident, Compliance and Risk Management Software (Folio) and administered by the Governance Unit.

The process for registering a compliment is as follows:

1. Raise a Compliment record in Folio
2. A certificate of recognition will be issued to the team member receiving the compliment
3. A record of the compliment will be included on the team members' employment record.
4. A post on the HOME in PLACE Message Board on SharePoint.

Refer to NG 119-1 Receiving a Compliment for details on the compliment process.

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.'