

## Complaints Handling Policy

### 1. Scope

Homes North's Complaints Handling Policy applies to all complaints received from applicants, tenants, contractors and other stakeholders of Homes North.

The Policy outlines the framework we use to identify, manage and promptly resolve complaints received from parties external to Homes North and is a key part of our Corporate Governance Policy. This framework is aligned with the Australian and New Zealand Standard Guidelines for Complaint Management in Organisations (AS/NZS 10002-2014).

The scope of this Policy does not manage internal employment related matters which are managed through our:

**Personal Grievance Policy** and **Equal Employment Opportunity Policy (EEO)** and; **Anti-Discrimination and Harassment Policy**.

### 2. Purpose

This policy ensures tenants, applicants, contractors, stakeholders and other community members are able to exercise their right to complain.

The policy outlines how Homes North will deal with complaints. Accompanying this policy are clear procedures on managing the complaints process, and enabling the resolution of complaints and ensure continual improvement of the organisation.

### 3. Policy Statement

We value complaints as they assist us to improve our services.

Homes North is committed to resolving complaints effectively and efficiently. This commitment is demonstrated through:

- The establishment, implementation and maintenance of this policy
- Appointment and training of senior managers to act as **Complaints Managers**
- Training of all staff and representatives with respect to our complaints handling procedures
- Ensuring our complaints handling procedures are accessible to all customers and other external parties
- The maintenance of our on-line complaints management system
- The implementation of management systems and reporting procedures to ensure timely and effective complaints handling and monitoring
- Regular analysis of complaints received and the implementation of rectification action where deficiencies in our internal systems and procedures are identified.

- Regular internal review of our complaints management processes with the use of the Complaints Handling Tool Kit.

#### 4. Guiding Principles

The principles guiding Homes North's Complaints Handling Policy include:

- **Complaints provide an opportunity for continuous organisational improvement**

Homes North treat complaints as a strategic opportunity for learning and continuous improvement. Complaints, and particularly trends in complaints, may indicate wider concerns or issues in our policy and practice. In welcoming complaints Homes North provides an opportunity to identify and resolve issues as they arise, and prevent future complaints by changing our organisational practice.

- **People have a right to complain**

Homes North recognises that a good complaint management approach is focused on people. We recognise that people have a right to complain, and to have their complaint addressed appropriately. The policy and procedure ensure that complainants are treated with fairness and respect.

- **A good complaints policy focuses on resolution**

Homes North's policy, procedures and practice drive a genuine attempt to resolve the issues where possible; rather than simply providing a response.

- **All complaints are treated promptly and fairly.**

Homes North's Complaint Handling Policy includes target timeframes for responding to and resolving complaints. Our process considers any actual or perceived conflicts of interest in matters by any staff member involved in managing a complaint. All sides involved in a complaint will be listened to and their viewpoint taken into account. Where a complaint is about a specific person the person will be given opportunity to respond.

- **The procedure provides opportunities for escalation and review**

Homes North's Complaint Handling Policy provides opportunities for escalation of a complaint, including a process for internal escalation as well as linking complainants to external review mechanisms.

Our process is a three stage escalation process, with two internal levels and one external level.

- **Key stakeholders are consulted in complaints handling**

Homes North employs a meaningful, appropriate and effective approach to complaint

management which relies on the involvement of key stakeholders (operational and management staff, tenants, applicants, neighbours, partner agencies, contractors and others).

- **Information and processes are visible and accessible**

Homes North ensures that our policy and procedures for managing complaints is open, visible and readily available to complainants and potential complainants. Accessibility is particularly important for complainants who might face significant barriers to making a complaint, such as cultural, language, disability or literacy barriers.

- **Roles and responsibilities are clearly defined**

Homes North has clearly defined roles and responsibilities for managing complaints and ensure responsibility for complaint management is adequately resourced to allow complaints to be addressed in a responsive and timely manner.

- **Staff members are properly trained to identify, diagnose and handle complaints**

Diagnosing an issue as a genuine complaint and understanding the complainant's expectations are critical early steps. Ensuring that staff members – and contractors, where relevant – are able to identify a complaint and are aware of the appropriate response is essential to ensure that Homes North's policies and procedures are being properly implemented. Staff members will continually refresh their knowledge of complaint management policies and procedures.

Complaint management training is provided for all relevant staff likely to be involved in the complaints handling process.

The two levels of complaint handling training are:

- Organisational culture and welcoming complaints as a way to improve services and client satisfaction. Training in this area involves management staff to ensure the culture is embedded throughout the organisation.
- Tailored training on diagnosing the concerns raised by stakeholders at the front counter and triaging of complaints to appropriate level.

- **Clear communication is maintained throughout the process**

Homes North will ensure complainants are informed of the status of their complaint, and will clearly communicate the results of the complaint. Clearly specified timeframes will also be communicated to complainants. Early communication is used to set realistic expectations around what Homes North can and cannot influence.

## 5. Three Levels of Complaint Management

Homes North's Complaint Handling process contains two internal levels and one external level of review. Our aim is to resolve the majority of complaints at the frontline level and have systems in place for matters to be escalated where necessary.

Homes North's internal levels are:

- **Level 1: frontline complaint handling – early resolution**

In order to adequately respond to complaints frontline staff will have the appropriate authority, training and supervision. Frontline staff will have clear guidance around the types of complaints that they should escalate to senior staff, and complaints which they can deal with directly, including the resolution options available to them.

Level 1 early resolutions are documented, reportable and are received by management. If unsure, escalate to level 2.

- **Level 2: internal assessment, investigation, facilitated resolution or review**

Homes North's second level of complaint handling deals with complaints of a level of seriousness that requires attention at a more senior level. Level two complaints require internal assessment of the nature of the matter; the complainant's desired outcome, and the options available for redress. This

process will then be followed by internal investigation, review, and facilitated resolution.

- **Level 3: External resolution**

Where internal levels of review do not result in the resolution of a complaint Homes North may elect to employ an external level of review.

## 6. Definitions and Diagnosis

It is important that Homes North staff are able to spot the difference between the concerns people raise be it a **complaint**, an **appeal**, a **request for service**, a **tenancy issue** or providing **feedback**. Collectively, Homes North refer to these as concerns. It is important to note that the difference is not always clear to the person making the complaint, lodging the appeal, requesting a service, or providing feedback. Staff receiving these concerns, have an important role in categorising them, responding to those that can be resolved on the spot or by forwarding the others to the appropriate Homes North team.

For example:

- Homes North may receive a call from a tenant who says they wish to make a complaint about their rent charge. In actual fact what they are asking is to **appeal** the amount of rent Homes North have calculated and charged.
- A tenant may present at the counter complaining about a plumbing problem in their property and may not be aware that they need to lodge a **request for service**.
- Homes North may receive a call from a neighbour complaining about the loud music of a tenant, which also raises a **tenancy (management) issue**.

While this Policy has been designed to manage complaints only, it is important to be able to distinguish between complaints and other concerns. The definitions below draw on the Standard (AS/ANZ 10002:2014) and NSW Ombudsman definitions, and are used to help staff categorise concerns raised by tenants, applicants and community members so they can determine the best response.

### General enquiry

A general enquiry is a request for information. Enquiries may come from tenants or applicants for housing assistance, or guardians or advocates on their behalf. Enquiries may also come from other community members or stakeholders.

### Request for service

A request for service is where an applicant, tenant, or guardian/advocate contacts Homes North or related contractor, such as a maintenance contractor, to ask for something. This could range from a request for maintenance work or to request a transfer application form. Staff receiving requests for service, have an important role in categorising them and forwarding them to the appropriate Homes North team.

### Complaint

A complaint is an expression of dissatisfaction with a housing service which requires resolution or response. The Standard (AS/NZS10002:2014) defines complaints as “expressions of dissatisfaction made to or about an organisation related to its products, services, staff, or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.”

The NSW Ombudsman also uses the Standard’s definition in its complaint management materials.

### Unreasonable complainant conduct

At times, a small number of people making complaints may behave unreasonably when making a complaint. This may include aggressive, threatening, or verbally abusive behaviour towards staff; contacting the organisation excessively; making inappropriate demands on the time and resources of the organisation; or refusing to accept the organisation’s decisions and recommendations about the complaint. The Standard notes that it is the behaviour, not the complainant, which is considered

unreasonable. Principles for dealing with unreasonable complainant conduct are included in the procedures associated with this policy. In continued or serious instances of *Unreasonable Compliant Conduct* Homes North adopts the NSW Ombudsman's Managing Unreasonable Complainant Conduct practice manual which contains further guidance and tools on managing unreasonable complainant behaviour.

### Tenancy issue

Tenancy issues are complaints or issues raised by tenants or other community members about their neighbours or neighbourhoods. This includes issues such as noise, vandalism, or anti-social behaviour. These are not considered to be complaints as they do not relate to dissatisfaction with the Homes North's services; however they can become complaints when tenants are not satisfied with how Homes North has handled the issue. Therefore, Homes North keeps records of these issues on the Tenancy Issues register as they are raised, and respond to them through tenancy management processes. See Homes North's Antisocial Behaviour Management Policy.

### Appeal

A Homes North applicant, tenant or ex-tenant has the right to lodge an appeal if they disagree with a decision we have made that they believe may affect their application, housing, or tenancy. This includes decisions relating to eligibility, offers of accommodation, rent assessment, transfers, pets or tenant charges. See Homes

North's Appeals Policy

### Feedback

Feedback refers to opinions or comments, positive or negative, given to an organisation about its services. Feedback generally does not require a response. According to Section 4 of the Standard, some organisations choose to manage negative feedback as a complaint.

It is important to make a note of all feedback received, and pass it on to relevant staff. Feedback can highlight areas for policy or process improvements. Equally it is important for staff morale to acknowledge and share positive feedback. Feedback will be documented, reported and monitored.

## 7. Promoting Access

Homes North is committed to ensuring that any barriers to making a complaint by tenants, applicants and others stakeholders are recognised and where possible removed.

Homes North provides multiple channels for complaints to be made, including in writing, online via complaints drop-down menu, email, phone and in person at any of our offices. Complaints can also be lodged with any Homes North staff member.

New England and Western Tenants Advice and Advocacy Service is also available to tenants and applicants wishing to seek advice around complaint lodgement.

## 8. Resolution

The key aim of Homes North's Complaints Policy is to provide a framework to raise and resolve complaints.

Options for resolution may include:

- **Communication with the complainant**, either verbally or in writing, which may include:
  - Explaining why the problem occurred
  - Giving reasons for decisions
  - Apologising
  - Providing information about further options, such as the NSW Housing Appeals Committee or another agency
  - Reaching agreements with the complainant through mediation or other resolution approaches
- **Rectification of the problem**, which could include:
  - Stopping an action that should not have been started or cancelling an intended action
  - Changes to processes or services to ensure the problem does not happen again
  - Ensuring compliance with obligations
  - Correcting records
- **Mitigation to reduce adverse consequences**, which could include:
  - Providing assistance and support
  - Refunding fees or charges
  
  - Waiving fees or debts
- **Satisfaction of the concerns of the complainant**, such as by:
  - Publicly acknowledging the mistake
  - Committing to improving systems, procedures or practices
  - Taking disciplinary action
- **Compensation**, including reimbursement of funds or a goodwill gift for the worry or distress caused to the complainant.

## 9. Who Handles Complaints?

### All Staff

Complaints may be received by any member of staff, at any time, either over the telephone, or during face to face meetings. So that complaints can be handled

properly, it is important for all members of staff to be trained with respect to Homes North complaints handling procedures, and in particular be familiar with our policies for **Receiving and Logging Complaints**:

- Be aware of their roles, responsibilities and authorities with respect to complaints;
- Be aware of what procedures to follow and what information to give to complainants;
- Report all complaints they receive;
- Treat applicants, tenants and other complainants in a courteous manner; and
- Show good interpersonal and good communication skills.

### Complaints Managers

We have appointed a number of key staff members to act as Complaints Managers. These individuals are authorised to investigate and manage complaints once they have been logged. Complaints Managers are responsible for:

- Ensuring that all staff are educated as to our **Complaints Handling Procedures**;
- Investigating and where necessary escalating complaints;
- Liaising with complainants;
- Maintaining accurate records including the **Complaints Register**;
- Management reporting of complaints;
- Ensuring systemic complaints are identified and rectified;
- Monitoring the effectiveness and continually improving our Complaints Handling Procedures; and
- Referring unresolved complaints to external dispute resolution where desired by the complainant.

Individuals in our organisation who are authorised to handle complaints are:

| Name           | Position                    | Email:   | Phone:  |
|----------------|-----------------------------|--|---|
| Richard Innis  | Operations Manager          | <a href="mailto:richardi@homesnorth.org.au">richardi@homesnorth.org.au</a>   | 6772 5133<br>x 110 (Armidale)<br>x 208 (Tamworth) |
| Michele Saxby  | Operations Coordinator      | <a href="mailto:micheles@homesnorth.org.au">micheles@homesnorth.org.au</a>   | 6772 5133<br>x 123 (Armidale)                     |
| Maree McKenzie | CEO                         | <a href="mailto:mareem@homesnorth.org.au">mareem@homesnorth.org.au</a>       | 6772 5133<br>x 104 (Armidale)                     |
| Margaret Adam  | Risk and Compliance Manager | <a href="mailto:margareta@homesnorth.org.au">margareta@homesnorth.org.au</a> | 6772 5133<br>x 113 (Armidale)                     |

### Complaints Triage Officer

The Complaints Triage Officer is responsible for:

- Screening/triaging complaints;
- Tracking timeframes for resolution of complaints internally;
- Written acknowledgement of the complaint; and
- Maintaining accurate records including the Complaints Register.

The Executive Assistant position has been assigned the Complaints Triage Officer role.

### Line Managers

Managers are responsible for:

- Promoting awareness of our complaints handling procedures and encouraging a culture which is supportive of identifying and reporting complaints;
- Ensuring that staff are trained with respect to our complaints handling procedures
- Ensuring our complaints handling procedures are implemented effectively within their areas of responsibility
- Liaising with our Complaints Managers where the complaint relates to their areas of responsibility and
- Ensuring rectification action is taken, where possible, to prevent the subject of the complaint reoccurring.

### Policy information

Policy No: 3.6.1\2 v2.2

Approved: July 2018

Minor amendments: 24 April 2019

## **National Community Housing Standards**

Standard 3.6 Complaints & appeals

### **Legislation or other requirements**

AS/NZS 10002-2014