



NAHC

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Complaints and suggestions policy

SP_TRP004

This document is controlled.

Introduction

Effectively managing Complaints and Suggestions helps National Affordable Housing Consortium Ltd and its subsidiaries (“NAHC Group”) ensure the resolution of Complainant issues while also providing opportunities for improving service delivery. The Complaints and Suggestions process gives Complainants the opportunity to raise issues with the NAHC Group and to have their concerns dealt with quickly and effectively.

Purpose / Scope

This policy is intended to apply to any complaints or suggestions about the NAHC Group regardless of the source, including (but not limited to) complaints/suggestions regarding:

- service delivery
- staff behavior, words and actions
- inconsistently applied policies or procedures
- procedural unfairness

A complaint or suggestion can be made by:

- a person to whom we deliver services,
- a person who is affected by our services,
- a business partner,
- a local organisation with which we work, or
- a member of the public.

This policy and the Complaints and Suggestions Procedure address the management of disputes, complaints and suggestions including the process for receiving, investigating, resolving and reporting issues.

The Appeals process is dealt with in a separate policy. Refer also to the NAHC Group’s Whistleblower Policy.

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P. 07 319 2500

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P. 07 3128 2080

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The NAHC Group is committed to having transparent and accessible processes for managing complaints and suggestions which are ethical, consistent and systematic. This includes ensuring that people who approach the NAHC Group about our service will not suffer any retribution, loss of service or reduction in the quality of the service they receive, and they will continue to be treated professionally and respectfully in their dealings with the organisation.

Complaints by staff and/or Directors are dealt with separately under the Human Resource Management – Internal Grievance and Dispute Resolution policy.

General Principles

- A.** Each complaint or suggestion will be considered in its own right and not disregarded because of any past complaints or actions of the person making the complaint or suggestion.
- B.** If the Managing Director or a Director is the subject of any complaint, the matter must be forwarded to the Chair of the Board of NAHC immediately. Complaints involving the Chair of the NAHC Board are to be forwarded to the Chair of the Audit and Risk Committee.
- C.** All staff members must ensure that the confidentiality and privacy of all parties is maintained in respect to any complaint or suggestion that they receive.

Definitions

- Appeal:** an appeal is a request to have a decision reviewed. An appeal involves a fresh look at the appellant's case or issue to see if the outcome should be changed in full or in part. The appeal will address the merits of the case and examine what the fairest outcome should be in line with relevant policies and procedures. An appeal is different to a complaint.
- Complaint:** complaint is an expression of dissatisfaction with, or concern about, the standard of service provided by the NAHC Group or the conduct or performance of the NAHC Group personnel whether justified or not, together with a request/demand for a different outcome in service delivery or treatment.
- Suggestion:** a suggestion is a recommendation for improvement in the standard of service provided by the NAHC Group or the conduct of NAHC personnel (whether justified or not), not associated with a request/demand for a different outcome in service delivery or treatment.

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Working Days: working days means business days excluding weekends and public holidays.

Related Documents / templates

- Complaints and Suggestions Procedure SP_TRP004-01
- Appeals Policy SP_TRP006
- Feedback, Complaints and Appeals Form
- 'Lodging a Complaint' Factsheet
- General Response to Complaint / Letter Templates
- Closing a Complaint / Appeal Letter Template
- Complaints and Appeals Flowchart
- Complaint Register Template
- Whistleblower Policy CG_COM001-0105
- Privacy Policy

This policy/procedure will be reviewed at least every three years, but may be reviewed at any time if a need for review is identified by the Board or Management (for example, to respond to material changes in relevant legislation or to governance or operational considerations).

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Complaints and suggestions policy

SP_TRP004-01

1. Publicising the Complaints and Suggestions Policy and Procedure

The National Affordable Housing Consortium Ltd and subsidiaries (“NAHC Group”) will ensure that all Complainants have access to this Policy/Procedure, including information about how to make a complaint by:

- Providing a Complaints, Suggestions and Appeals fact sheet in the tenant sign-up pack;
- Publishing this Policy and Procedure on the organisation’s website; and
- Providing copies of the Complaints, Appeals and Suggestions Factsheet and lodgment forms in the reception area.

2. Types of Complaints

The NAHC Group categorises complaints into the following groupings:

- **Negligible** – minimal impact or risk to the organisation or personnel
- **Minor** – resolvable at the point of service
- **Moderate** – issues that may require more comprehensive assessment or investigation
- **Major** – significant issues or issues causing lasting detriment that require investigation
- **Extreme** – issues about serious adverse events, long-term damage or death that requires investigation

3. Making and Receiving a Complaint

A. Making a Complaint:

- i. Complainants can raise concerns in person, by telephone, by email or by post.
- ii. The Formal Complaint Form can be accessed on the NAHC website. If requested by a Complainant, the attending staff member will email or post the Formal Complaint Form to the Complainant.

B. Receiving a Complaint

- i. Any staff member, Manager, Director or Officer may receive a Complaint.
- ii. The recipient of a complaint must immediately pass the details of the Complaint and the Complainant to the staff member or manager responsible for the activities that are the subject of the Complaint.

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C. Informal Complaint and Resolution

In certain circumstances, a Negligible or Minor Complaint may be dealt with promptly through discussions with the relevant staff member or manager. In these circumstances, no Complaint Form is required and the Complaint does not need to be added to the Complaints Register.

D. Formal Complaint

- i. Negligible, Minor or Moderate Complaints: if a Complainant is not satisfied with the resolution proposed by the attending or relevant staff member or if the Complaint is classified as Moderate, then the following steps must be followed:
 1. The relevant or attending staff member asks the Complainant to complete a Complaint Form.
 2. Once the staff member receives the completed Complaint Form, the staff member must log the Complaint on the Complaint Register, notify their Division Manager of the Complaint, and provide a written acknowledgement of receipt to the Complainant.
 3. The Division Manager commences an investigation of the Complaint.
 4. Within 20 working days, the Division Manager must provide a written statement to the Complainant, outlining the results of the investigation and NAHC's proposed resolution.*
- ii. Major and Extreme Complaints: the following steps must be followed in cases of Major and Extreme Complaints:
 1. The relevant or attending staff member asks the Complainant to complete a Complaint Form.
 2. Even before receiving the completed Complaint Form, the attending staff member must notify their Division Manager of the Complaint and log the Complaint in the Complaint Register.
 3. For Major Complaints, within 2 calendar days of receiving the Complaint (or sooner depending on urgency of the issue), the Division Manager must conduct an initial investigation of the Complaint and provide a preliminary report to the Managing Director for review. In a case of an Extreme Complaint, the Division Manager must immediately alert the Managing Director and provide whatever details of the Complaint and the Complainant that the Manager has available.
 4. Once the completed Complaint Form is received, the Division Manager will provide the Complaint Form to the Managing Director, update the Complaint Register (where necessary), and send a written acknowledgement of receipt to the Complainant.

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Complaints and suggestions policy

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5. If the Managing Director agrees that the Complaint is a Major or Extreme Complaint, the Managing Director shall instruct the Division Manager to conduct an investigation.
6. Upon completion of the investigation and within 20 working days, the Managing Director and the Division Manager shall prepare a written statement to the Complainant, outlining the results of the investigation, NAHC's conclusions and NAHC's proposed resolution.*

*(Where it is not possible due to the nature of the issue to respond to the Complainant within 20 working days, the complainant will be notified of progress, in writing, within 20 working days and every 14 days thereafter until the complaint is resolved or the internal review process has been exhausted.)

4. Investigating Complaints

The methods used for the investigation and resolution of a Complaint will vary according to the type and nature of each Complaint. However, the following key steps in the process must be followed in every case:

- A. Identify factual issues for investigation and possible sources of information;
- B. Properly recording relevant information obtained during any investigation; paying due regard to confidentiality and privacy issues;
- C. Assessing information and sources impartially, including avoiding any possible conflicts of interest;
- D. Giving people an opportunity to comment on information that may be adverse to their interests (natural justice);
- E. Ensuring findings are soundly based and properly recorded.

5. Types of remedies

Where a dispute or complaint is upheld, one or more of the following remedies may be applied:

- A written apology
- A written explanation
- Correction of incorrect or misleading records or information
- Review of policy, procedure and/or practice
- Compensation for an actual loss
- Commence disciplinary procedure

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Where the complaint is not substantiated, the client will be notified in writing. Information on the appeals policy and procedure will also be included.

6. Closing Complaints

Once the investigation is completed the Complainant will be formally advised. The response will explain the reason(s) for any decision.

If the Complainant is still not satisfied with the NAHC Group's response, they have the option of lodging an appeal or referring the matter to an external body. In this case, please refer the Complainant to the Appeals Policy and Procedure.

7. Recording and Tracking Complaint Data

The Complaints Register will be used to track the progress of complaints and appeals. The following non-identifying information will be recorded and used to track the progress of the complaint/appeal:

- A.** When the complaint was received, acknowledged and who is managing it
- B.** The nature of the complaint
- C.** Actions taken to resolve/investigate the complaint
- D.** The outcome of the complaint investigation and at what stage in the process
- E.** Any remedy offered
- F.** Information provided to the complainant
- G.** Date the complaint was resolved and/or file closed

A Complaints Register will be established to record non-identifying information about complaints and appeals. Reports will be periodically presented to the Audit & Risk Committee by the Legal Affairs & Quality Assurance manager to enable the Committee to monitor progress and trends in the resolution of complaints and appeals, and to take appropriate action where there are wider implications for the policies, procedures and operations of the organisation.

8. Governance Reporting Requirements

A. Regular Reports:

The Legal Affairs & Quality Assurance Manager shall provide a Complaints Report to the Audit & Risk Committee at each meeting of the Committee. The Complaints Report shall contain:

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- the number and types of complaints,
- status and outcomes of complaints,
- investigation processes and any apparent trends, and
- proposals for organisational improvement based on disputes and complaint data.

The Audit & Risk Committee may decide to refer the Complaint to the full Board as necessary.

B. Extreme Complaints:

The Managing Director (or in his absence the Legal Affairs & Quality Assurance Manager) will immediately report an Extreme Complaint to the Chair of the Audit & Risk Committee and the Chair of the Board of NAHC.

9. Feedback

Once the complaint process is complete, the Complainant may be requested to provide feedback on their experience of the complaints handling process. Any feedback received will be used to guide service improvement.

10. Corruption

If a complaint concerns corrupt conduct, the matter will be referred to the Managing Director. All such information will be treated in a confidential manner.

11. Independent Assessments

Lodging a complaint does not deny a complainant their right to follow any other avenues for complaint, which may include:

- Seeking support from their local Member of Parliament
- Contacting a tenants' advice service or community legal centre for advice and assistance.
- Making an application to the Queensland Civil Appeals Tribunal (QCAT).
- Making an application to the NSW Civil & Administrative Tribunal (NCAT).
- Making an application to the Victorian Civil and Administrative Tribunal (VCAT).
- Calling Consumer Affairs Victoria's Estate Agent Resolution Service (EARS) on 1300 73 70 30, who may be able to offer advice to the Complainant about the dispute before they lodge a complaint.
- Making a written complaint to Consumer Affairs Victoria online at www.consumer.vic.gov.au

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- If the Complainant is a tenant or prospective tenant through an NAHC Group company that is a registered agency in Victoria (“Agency”), a formal complaint has been lodged with the Agency and after 30 days the matter is not satisfactorily resolved, the Complainant can then contact the Victorian Housing Registrar in writing or via email at housingregistrarcomplaints@dtf.vic.gov.au to discuss their concerns.

12. Managing Suggestions

- A. A staff member that receives a Suggestion will report the Suggestion to their Divisional Manager.
- B. The Divisional Manager shall record each suggestion received in the Complaints Register, labelling the entry as a “suggestion”.
- C. Periodically, the Operations Committee shall review suggestions received and discuss whether amendments to practice/behavior are necessary.

13. Registrar for Community Housing (RCH) contact

To contact your local Housing Registrar’s office:

New South Wales

Registrar of Community Housing
Locked Bag 4001
ASHFIELD BC 1800
Phone: 1800 330 940
Fax: (02) 8741 2522
Email: registrar@facs.nsw.gov.au

Queensland

Regulatory Services
Level 19
41 George Street
BRISBANE QLD 4000
Phone: (07) 3008 3450
Email: NRS-Housing-Registrar-QLD@hpw.qld.gov.au

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Victoria

Housing Registrar
Department of Treasury and Finance
Level 5, 1 Treasury Place
MELBOURNE VIC 3001
Phone: (03) 9651 1402
Email: housingregistrarcomplaints@dtf.vic.gov.au

Related Documents / Templates

- Appeals Policy SP_TRP006
- Appeals Procedure SP_TRP006-01
- Complaints and Appeals Form
- 'Lodging a Complaint' Factsheet
- General Response to Complaint / Letter Templates
- Closing a Complaint / Appeal Letter Template
- Complaints and Appeals Flowchart
- Complaint Register Template
- Whistleblower Procedure CG_COM001-0106
- Privacy and Confidentiality Procedure CG_PC001-01

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