

Compliments, Complaints and Appeals Policy

1. Introduction

1.1 Purpose

The National Affordable Housing, National Affordable Housing Victoria and related entities (“NAH Group”) is committed to having transparent and accessible processes for managing compliments, complaints and appeals which are fair, respectful, ethical, and consistent.

This policy is intended to apply to any compliments, complaints or appeals about the NAH Group regardless of the source, regarding (but not limited to):

- quality, accessibility and standard of service delivery
- employee, or contractor, behaviour, words, actions, decisions, and performance
- inconsistently applied policies or procedures
- procedural unfairness

This policy area ensures that the NAH Group:

- Recognises the rights of others to make a compliment, complaint, or appeal.
- Is effectively managing Complaints and Appeals so they are resolved promptly and respectfully.
- Where possible resolve complaints to the satisfaction of both the complainant and the organisation.
- Empowers employees to resolve issues fairly and efficiently.
- Learns from complaints and appeals to update and improve service delivery.

In deciding what action to take, the NAH Group employees must consider the relevant human rights in accordance with the Human Rights Act 2019 (QLD) and the Human Rights and Responsibilities Charter Act 2006 (VIC) to respect, protect and promote human rights.

1.2 Scope

This policy applies to all NAH Group employee, contractors, and Board of Directors receiving or managing compliments, complaints or appeals from tenants and the public made to or about us, regarding our products, services and employee, or our complaints and appeals handling process.

The NAH Group expects employee at all levels to be committed to fair, effective, and efficient complaint and appeals handling.

1.3 Informing documents

- National Regulatory System for Community Housing Standards
- Victorian Community Housing Regulatory Framework
- Residential Tenancies Rooming Accommodation Act (RTAA) QLD
- Residential Tenancies Act (RTA) VIC
- Human Rights Act 2019 (QLD)
- The Human Rights and Responsibilities Charter Act 2006 (VIC)
- Commonwealth Ombudsman – Better Practice Complaint Handling Guide

2. Terms and Definitions

Appeal: An appeal is a request to have a decision made by NAH Group 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.

Complaint A complaint is an implied or expressed statement where a response is sought, reasonable to expect or legally required.

This definition is broader than, but consistent with, the definition in AS/NZS 10002:2014. It includes dissatisfaction with NAH's:

- Customer services
- Actions or decisions
- Inaction or delay
- Policy or processes

It recognises that complaints that are outside of NAH's area of responsibility should be treated as complaints and should be resolved by referring the person to the correct complaint pathway.

Complaints handling/ management system All policies, procedures, and practices used by the NAH Group in the management of complaints.

Complainant: The person making a complaint. A complaint can be made by:

- a person to whom we deliver services,
- immediate family member, guardian, support person of a person affected on behalf of that person
- a person who is affected by our services,
- a business partner,
- a local organisation with which we work

Compliment A positive statement or praise on any aspect of our service, employee performance or experience the person has had.

Disputes Disputes relate to wider neighbourhood issues such as difficulties with neighbours or accusations of antisocial behaviour.

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

3. NAH Complaints Policy Steps



3.1 Step 1: Receive and facilitate compliments, complaints, or appeals statement.

The NAH Group is committed to:

- Promoting and providing easily understood information about our compliments, complaints and appeals handling process and how to access it.
- Transparency in our dealings with and handlings of complaints
- Ensuring that people who approach the NAH Group about our service will not suffer any retribution, loss of service or reduction in the quality of the service they receive.
- Considering each complaint or appeal in its own right and not be disregarded because of any past complaints, appeals or actions of the person making the complaint or appeal.
- Ensuring that the confidentiality and privacy of all parties is maintained in respect to any complaint or appeal received.
- Accepting anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.
- Communicating with an assistant or representative of the complainant.
- Provide support to the complainant to make a complaint or appeal to ensure the process is accessible.
- Make referrals to appropriate advocacy and legal services to assist complainants.

3.2 Step 2: Acknowledge and investigate complaints or appeals.

The NAH Group is committed to:

- Responding to complaints or appeals within specified timeframes and following due process
- Encouraging a preventative approach by addressing issues that arise at the point of service, professionally and informally, before they become a formal complaint or appeal.
- Assessing and prioritising complaints or appeals in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.
- Ensuring that the person handling a complaint or appeal is different from any employee whose conduct or service is being complained about or decision being disagreed with.
- Assessing each complaint or appeal on its merits and involve people making the complaint or appeal and/or their representative in the process as far as possible.

3.3 Step 3: Manage, resolve, and report complaints or appeals.

The NAH Group is committed to:

- Managing people's expectations, and will inform them as soon as possible, of the following:
 - the complaints or appeals process
 - the expected time frames for our actions
 - the progress of the complaint or appeal and reasons for any delay
 - their likely involvement in the process, and
 - the possible or likely outcome of their complaint or appeal.
- Working with other organisation/s where possible, if a complaint or appeal involves multiple organisations to ensure that communication with the person making a complaint or appeal and/or their representative is clear and coordinated.
- Privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint or appeal.
- Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our employees but also the actions of our service providers.
- Taking proactive and decisive action to manage any conduct that negatively and unreasonably affects NAH or our employees.

4. Analysis and monitoring of complaints

The NAH Group will ensure that compliments, complaints, and appeals are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management.

The NAH Group will run regular reports on:

- The number of complaints or appeals received.
- The time taken to resolve complaints or appeals.
- Issues arising from complaints or appeals.
- Systemic issues identified.
- The outcome of complaints or appeals, including matters resolved at the frontline.
- The number of requests received for internal and/or external review of our complaint or appeal handling.
- The details of external bodies applied for external appeals review.
- The results of the external appeals review

The NAH Group will regularly review the complaints and appeals management system and complaints and appeals data to improve our services to customers.

5. List of Procedures

1. Publicising the Complaints and Suggestions Policy and Procedure
2. Types of Complaints
3. Making and Receiving a Complaint
4. Investigating Complaints
5. Types of remedies
6. Closing Complaints
7. Recording and Tracking Complaint Data
8. Governance Reporting Requirements
9. Feedback on Complaints process
10. Corruption
11. Independent Assessments
12. Analysis of Complaints Management System
13. Supporting documents, templates, forms