

Customer Feedback and Complaints Policy

1 Purpose

This policy outlines Housing Plus's commitment to responding to and resolving customer feedback and complaints, including:

- The guiding principles of the customer feedback and complaints system.
- Types of customer feedback and complaints.
- Assistance available to customers to provide feedback or make a complaint.
- Housing Plus's responsibilities for receiving, acknowledging, investigating, and resolving customer feedback requests and complaints.
- Avenues for internal and external review or appeal.
- Housing Plus's responsibilities for analysing complaints, implementing changes, and reporting on complaints.

2 Scope

This policy applies to compliments, criticisms, complaints, comments or suggestions from tenants, applicants, clients, key partners, referral agencies, advocates, or members of the community about the standard or type of service Housing Plus provides.

- a. This policy applies to all Housing Plus employees, management, contractors, and volunteers.
- b. It describes the organisation's policy regarding customer feedback and complaints management. This policy does not include employee feedback and complaints management. Internal suggestions, complaints or grievances are managed through Housing Plus's Complaints Management Page (SharePoint), Grievance Resolution and/or Bullying, Harassment & Discrimination Prevention Policy, and Whistleblower Policy.

3 References

- a) Customer Feedback and Complaints Policy (Easy English)
- b) Grievance Resolution Policy
- c) Anti-Social Behaviour Policy
- d) Code of Conduct
- e) Privacy Policy
- f) Unreasonable Complainant Conduct Policy
- g) Whistleblower Policy
- h) Customer Feedback and Complaints Procedure
- i) Customer Feedback and Complaints Form
- j) Customer Feedback and Complaints Fact Sheet

4 Definitions

Acknowledgment: Acceptance of a customer's right to provide feedback or make a complaint.

Actions: What will be done, by whom and by when.

Appeal: An appeal is made against a policy decision.

Complainant: A person who makes a complaint.

Complaint: An expression of dissatisfaction made to or about Housing Plus, our services, employees, or the handling of a complaint where a response is sought, reasonable to expect or legally required.

Complaints Manager: The employee who is responsible for managing the complaint. All employees are expected to be able to manage complaints.

Compliment: Expression of praise, encouragement or gratitude about services provided by Housing Plus.

Customer: A tenant, applicant, client, key partner, referral agency, advocate, supplier, or member of the community.

Customer feedback and complaints system: The system for recording customer feedback and complaints i.e. the Customer Feedback and Complaints Register in SharePoint or Greentree.

Feedback: Information from customers about any service, action, policy, or employee within Housing Plus where a response is not sought, or not reasonable to expect; includes compliments, criticisms, comments, and suggestions.

Unreasonable complainant conduct (UCC): Behaviour by a current or former complainant which, because of its nature or frequency, raises substantial health, safety, resource, or equity issues for Housing Plus, our employees, other customers, or the complainant.

Working days: Means days our offices are open (e.g. Monday to Friday). It doesn't include weekends and public holidays.

5 Responsibilities

Effective management of customer feedback and complaints requires a whole-of-organisation approach with clear points of accountability for reporting and feedback, as follows:

5.1 Chief Executive Officer (CEO)

- Encourage an environment where customer feedback and complaints are handled seriously and thoroughly with support from Executive and Management.
- Ensure an effective customer feedback and complaints management system is developed and in place for the organisation.
- Encourage employees to make recommendations for system improvements.

- Ensure appropriate resources are available and utilised for effective customer feedback and complaints management.
- Report to the Housing Plus Board of Directors in accordance with the governance provisions.
- Recognise and reward good customer feedback and complaints handling by employees.
- Nominate an employee within the organisation who is responsible for:
 - Ensuring monitoring and risk rating of all customer feedback and complaints.
 - Ensuring actions are implemented to eliminate or minimise similar problems from occurring.
 - Reporting trended customer feedback and complaints data at least every quarter and annually to the Housing Plus Board of Directors.
 - Implementing training on customer feedback and complaints management.
 - Reporting publicly on Housing Plus's customer feedback and complaints handling.

5.2 Executive

- Ensuring adoption and implementation of Customer Feedback and Complaints Policy within their team and providing assurance of compliance.
- Oversee training for their employees.
- Encourage employees to make recommendations for system improvements.
- Recognise and reward good customer feedback and complaints handling by employees.
- Implement changes arising from feedback and from the analysis and evaluation of complaints data.

5.3 Governance Manager

- Ensure dissemination and regular review of Customer Feedback and Complaints Policy and provide assurance of compliance.

5.4 Management

- Ensure adoption and implementation of Customer Feedback and Complaints Policy within their team and provide assurance of compliance.
- Oversee training for their employees.
- Act as Complaints Manager, including:
 - Investigating and escalating complaints
 - Liaising with complainants
 - Maintaining accurate records
 - Management reporting; and
 - Referring unresolved complaints for external review.
- Implement changes arising from customer feedback and from the analysis and evaluation of complaints data.

5.5 Employees

- Understand and comply with the Customer Feedback and Complaints Policy.
- Treat customers in a courteous manner.
- Demonstrate good interpersonal and communication skills.
- Provide suggestions on ways to improve the customer feedback and complaints system.

- Implement changes arising from feedback and from the analysis and evaluation of complaints data.

6 Policy

6.1 Our Obligation

Housing Plus must comply with the National Law and National Regulatory Code as well as the Evidence Guidelines issued by the Registrar of Community Housing. Under the Evidence Guidelines, all community housing providers are required to implement policies and procedures that provide mechanisms for customer complaints and appeals.

Housing Plus is also contractually obligated to implement policies and procedures for obtaining feedback and complaints from customers under individual funding agreements.

6.2 Types of Customer Complaints

Types of customer complaints covered under this policy include:

Services

- Accessibility of Housing Plus services
- Quality of Housing Plus services
- Competence or conduct of Housing Plus employees, including contractors

Actions or decisions

- Incorrect or unfair
- Reasons not properly explained

Inaction or delay

- Not responding to requests
- Delay providing services
- Inaction or delays not explained

Policy and procedure

- Disagreement with Housing Plus policy or procedure
- Not properly explained

Examples of matters that are not covered under this policy include:

- An initial request for a service or action
- Requests for information or explanations
- Requests for updates
- A complaint by an employee about the behaviour of another employee

6.3 Ministerial Complaints

A Ministerial Complaint and/or any request for information in relation to a Ministerial Complaint must be flagged as high priority and referred to the CEO or delegated nominee for action.

6.4 Complaints Involving the CEO

A complaint involving the CEO must be reported to the Chair of the Housing Plus Board of Directors.

6.5 Unreasonable Complainant Conduct

Unreasonable complainant conduct must be flagged as high priority and referred to the CEO or delegated nominee. Action must be taken in accordance with Housing Plus's Unreasonable Complainant Conduct Policy.

6.6 Anonymous Feedback and Complaints

Housing Plus accepts anonymous customer feedback and complaints and will carry out an investigation of the issues raised where there is enough information provided.

6.7 Facilitating Customer Feedback and Complaints

All customers will be:

- Given information about how to provide feedback and complaints during the initial intake and assessment process or lease sign-up. This includes explaining the Customer Feedback and Complaints Policy and providing customers with a fact sheet.
- Provided with multiple ways to provide feedback and complaints, including in person, over the phone, in writing, via email or online.
- Listened to, treated with respect by employees and actively involved in the complaints process where possible and appropriate; and
- Provided with reasons for our decision(s) and any options for redress, review, or appeal.

6.8 Accessibility

The process for providing feedback and complaints must be accessible for all customers, particularly those who require assistance. Where appropriate, this includes:

- Providing the right for a support person to attend any interviews or meetings with the customer.
- Helping a customer to express their feedback or complaint in writing where a customer has limited literacy skills or impaired vision.
- Organising an Auslan interpreter.
- Using the Telephone Interpreter Service (TIS).
- Organising National Relay Service (NRS) assistance.
- Accepting feedback or complaints from a carer or third party (e.g. family member or friend) with written permission from the customer.
- Suggesting and referring to an advocate. Some examples include:
 - Local Tenants' Advice and Advocacy Services – www.tenants.org.au
 - Community Legal Centres – www.clcnsw.org.au
 - NSW Fair Trading – 133 220 or www.fairtrading.nsw.gov.au
 - Disability Advocacy NSW – 1300 365 085 or www.da.org.au
- Providing the easy English Customer Feedback and Complaints Policy.
- Being responsive to a customer's cultural needs e.g. Aboriginal and/or Torres Strait Islander customers should be asked if they would like a Housing Plus Aboriginal and/or Torres Strait Islander employee to manage their feedback or complaint.

Training in disability awareness and complex communication needs will be provided to employees.

6.9 Receiving Customer Feedback

We will record all customer feedback in the customer feedback and complaints system. The record of the customer feedback or complaint will document:

- The name, contact number, and email of the customer providing the feedback.
- Issues raised by the customer providing the feedback.

6.10 Receiving Customer Complaints

We will record all customer complaints in the customer feedback and complaints system. The record of the customer complaint will document:

- The name, contact number, email, and preferred method of contact for the customer providing the complaint.
- Issues raised by the customer providing the complaint and the outcome(s) they want.

All customer complaints must be recorded in the customer feedback and complaints system, even issues that are resolved immediately with the customer. This helps Housing Plus to identify recurring issues and implement changes.

Issues that are resolved immediately must be closed and the outcome(s) recorded (refer 6.14).

6.11 Acknowledging Customer Complaints

We will acknowledge receipt of customer complaints promptly and preferably within **seven (7) working days**.

We will respond to customer complaints 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.

Consideration will be given to the most appropriate medium for communicating with the customer (e.g. email, letter, telephone call) based on their needs.

Our acknowledgement will include:

- Information about the customer complaints process
- The expected timeframes for our actions
- Their likely involvement in the process
- The possible or likely outcome.
- Where issues and/or complaints may be directed if we are unable to deal with any part of it.

6.12 Investigating Customer Complaints

We will resolve customer complaints within **21 working days**. Actions to investigate the issue must be recorded in the customer feedback and complaints system.

If we are unable to resolve the issue within 21 days, the Complaints Manager will:

- Contact the customer by telephone if possible, or otherwise in writing

- Advise the customer of the reasons for the delay; and
- Advise the customer of a new target resolution date.

6.13 Proposing Resolutions

We will contact the customer and advise them of:

- The outcome of the investigation and the resolution(s) that we propose to put in place.
- The reason(s) for our decision; and
- Any options for review, such as internal review, external review, or appeal.

Consideration will be given to the most appropriate medium for communicating (e.g. email, letter, telephone call) with the customer based on their needs.

6.14 Implementing Resolutions

Our aim is to find a resolution that the customer is satisfied with and that resolves the complaint. Where possible, a proposed resolution should be accepted by the customer before we implement it.

If the proposed resolution is not accepted by the customer, the customer has the right to request an internal review.

6.15 Closing Customer Complaints

The customer feedback and complaints system must be updated to include:

- The outcome(s) of the investigation, including any recommendations to address the identified issues and any outstanding actions that require follow up.
- The date the response was provided.

6.16 Internal Review

If a customer is not satisfied with our response, they have the option to escalate to the CEO for investigation. A response must be provided within **10 working days**.

6.17 External Review

Housing Plus will inform customers about any external review options available to them.

Avenues for external review include, but are not limited to:

Housing Appeals Committee (HAC)	Apply online Free call: 1800 629 794 Phone: 02 8741 2555
NSW Civil and Administrative Tribunal (NCAT)	Apply online Phone: 1300 006 228
Registrar of Community Housing	Apply online Phone: 1800 330 940
NSW Ombudsman	Apply online Phone: 1800 451 524
South West Tenants' Advice Service (SWTAS)	Provides advocacy at the NSW Civil and Administrative Tribunal (NCAT) on behalf of tenants. Can also assist with Housing Appeals Committee applications.
Western Aboriginal Tenants Advice and Advocacy Service (WATAAS)	

6.18 Record Keeping

If information relating to customer feedback or complaints is requested by an external party (e.g., regulator or complainant), we will consider the circumstances of the request and, if necessary, seek legal advice.

Records of customer feedback and complaints will be maintained for a minimum of seven (7) years.

6.19 Internal Reporting

Data analysis and reporting on customer feedback and complaints is conducted monthly by management.

Key Performance Indicators on complaint performance are reported monthly to the Housing Plus Board of Directors and Executive.

6.20 External Reporting

Housing Plus will publicise our customer complaints record through the following medium:

- Website
- Annual report
- Tenant newsletters
- Tenant Advisory Groups

6.21 Reporting to the Board of Directors

The Board of Directors and senior management will be notified of serious complaints as soon as possible.

Serious complaints include those that are reported to the Registrar and any that relate to work health and safety, allegations of fraud or the behaviour and conduct of the CEO.

Annually, the CEO will provide the Board of Directors with an analysis of the previous year's complaints. This includes:

- The number of compliments, complaints, appeals, or comments received
- Details of the feedback and analysis of individual complaints
- Details of corrective action undertaken
- Statistical trends
- Qualitative trends and themes.

6.22 Reporting to the Registrar

Under the Evidence Guidelines, Housing Plus must notify the Registrar of Community Housing of any incident relating to its operations that damages or may damage the reputation of the community housing sector.

If the Complaints Manager identifies a complaint of this nature, they must advise the CEO immediately.

The CEO will determine whether to notify the Registrar.

6.23 Reporting to Funding Bodies

Customer feedback and complaints must be reported to funding bodies in accordance with individual funding agreements.

6.24 Monitoring of the Customer Feedback and Complaints System

Monitoring of the customer feedback and complaints system will be undertaken through customer satisfaction surveys and employee feedback.

6.25 Continuous Improvement

Regular analysis of customer feedback and complaints will be undertaken to monitor trends, measure the quality of our service delivery and make improvements.

7 Training

The Customer Feedback and Complaints Policy is applicable to all employees and is a component of mandatory training.

7.1 New Staff Training

All employees must satisfactorily complete the Customer Feedback and Complaints training module within three (3) weeks of commencing their role.

7.2 Recurrent Training

All employees must satisfactorily complete refresher training on a two-yearly basis.

7.3 Special Training

All employees will need to satisfactorily complete additional training where there are major changes in policy. Where there is a breach in policy, employees may also require additional refresher training. Additional training on disability awareness, complex communication needs, and other subjects may be required for employees who routinely handle customer feedback and complaints.

8 DOCUMENT CONTROL

8.1 Document History

Action	Responsible Person	Date	Approved By (if req'd)
Created Draft	James Gutherson	21/05/2016	
Updated Positions and Language	James Gutherson	21/11/2018	
Updated references to Complaint/Incident Management System. 5, 6.5, 6.6, 6.7, 8.2 and 10.2 revised	Temp Governance Mgr Liz Stamatelos	30/09/2019	
Updated to simplify	Carrie Drage	06/05/2022	David Fisher 12/05/22
Updated to include contact details for	Carrie Drage	29/08/2022	

external review bodies			
---------------------------	--	--	--

8.2 Attachments

Please list any attachments here