

CUSTOMER FEEDBACK, APPEALS AND COMPLAINTS POLICY

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1 Purpose and Objective

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

2 Scope

- a. This policy applies to all Housing Plus and its subsidiaries Employees, Management and Other Stakeholders including Volunteers.
- b. This policy applies to feedback, appeals and complaints from tenants, applicants and stakeholders (customers) about the standard or type of service Housing Plus provides.
- c. This policy does not apply to employee feedback and complaints management or whistleblower action.

3 References

3.1 Legislation

- Australian Privacy Principles under the Privacy Act 1988 (Commonwealth)
- Ombudsman Act 1974
- Housing Act 2001
- NSW Residential Tenancies Act 2010
- Health Records and Information Privacy Act 2002

3.2 Policies

- Housing Plus Grievance Resolution Policy
- Housing Plus Anti-Social Behaviour Policy
- Housing Plus Code of Conduct
- Housing Plus Privacy Policy
- Housing Plus Unreasonable Complainant Conduct Policy
- Housing Plus Whistleblower Policy
- Housing Plus Feedback and Complaints Form
- Housing Plus Feedback and Complaints Form (Easy English)
- Housing Plus Feedback and Complaints Form (Accessible)
- Housing Plus Feedback Poster
- Community Housing Complaints, Issues and Appeals Management Framework

4 Definitions

Term: Company

Definition: Housing Plus, ABN 83 147 459 461, and all of its related and associated entities

Term: Employee

Definition: An individual who is directly engaged and paid by the Company as an Employee

Term: Manager

Definition: An Employee who has direct reports (includes Executive, Senior Management and Team Leaders). In situations involving volunteers, 'Manager' refers to the Volunteer Supervisor

Term: Executive

Definition: A member of the Executive team

Term: Volunteer or Other Stakeholders

Definition: Collectively refers to any individual(s) who is not an Employee but who carries out work (whether paid or unpaid) for the Company, including (but not limited to) work as a volunteer, contractor, secondee, consultant or subcontractor, labour hire company, an apprentice or trainee, and a student gaining work experience.

Term: Work Environment

Definition: Includes but is not limited to:

- During and outside normal working hours.
- All functions, events and places which are work related (e.g. Including working from home under the flexible work policy, work lunches, conferences, Christmas parties and client functions).
- During the recruitment process, any environment which has sufficient connection to employment; decisions about promotions and other career opportunities, or in the termination of employment.
- In the course of providing goods and services.

Term: Appeal

Definition: A request for a review of a decision that impacts on a customer's housing.

Term: Complaint

Definition: 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.

Term: Complaints Investigator

Definition: An employee who has been allocated to investigate an appeal or complaint.

Term: Customer

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

Term: Feedback

Definition: Information from customers about any action, policy, or employee within Housing Plus; includes compliments, complaints, and comments.

Term: Unreasonable complainant conduct

Definition: 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.

5 Responsibilities

5.1 Chief Executive Officer

- a. Encourage an environment where customer feedback, appeals and complaints are handled seriously and thoroughly with support from Executive and Management.
- b. Ensure an effective customer feedback, appeals and complaints management system is developed and in place for the organisation.
- c. Report to the Housing Plus Board of Directors in accordance with the governance provisions.

5.2 Executive

- a. Ensure adequate resources are provided to implement and support this policy.
- b. Manage the implementation of and adherence to this policy.
- c. Model appropriate standards of behaviour.

5.3 Management

- a. Ensure that all Employees and Other Stakeholders are aware this policy and understand their obligations.
- b. Ensure effective implementation of and adherence to this policy.
- c. Model appropriate standards of behaviour.

5.4 Employees, Volunteers and other Stakeholders

- a. Understand and comply with this policy.
- b. Model appropriate standards of behaviour.

6 Policy

Housing Plus is committed to the highest standards for good governance and ethical behaviour. This policy sets out how Housing Plus maintains an environment where feedback,

appeals and complaints about our organisational services can be received, managed, and reported in a transparent and efficient manner.

Housing Plus complies with the National Law and National Regulatory Code as well as the Evidence Guidelines issued by the Registrar of Community Housing when responding to and resolving feedback, appeals and complaints. Under the Evidence Guidelines, Housing Plus is required to implement policies and procedures that provide mechanisms for customer complaints and appeals. The Evidence Guidelines can be found here: www.nrsch.gov.au/providers/performance-standards-and-evidence.

6.1 Feedback

Housing Plus defines feedback as opinions or comments, positive or negative, given to us about our services. Feedback is an informal process that has no investigation element. If a person chooses to give feedback on our services, they can still make a complaint if our service doesn't improve. Customers do not need to give feedback before they can make a complaint or an appeal.

Housing Plus welcomes feedback on all our services. There is no time limit to provide feedback. Feedback can be made to any Housing Plus employee, or by email, letter, telephone, in person or by completing the form on our website available here: www.housingplus.com.au/contact-us/feedback

6.2 Appeals and complaints

A complaint is an expression of dissatisfaction made to or about Housing Plus, related to our products, services, employees or handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. We understand that complaining can be difficult and will support customers to make their issue known and work to resolve it in a way that is comfortable for the person complaining.

An appeal is a request for a review of a service delivery decision made by Housing Plus. This includes decisions relating to eligibility, offers of housing, rent assessment, transfers, pets or tenant charges.

The timeframe to appeal a decision or make a complaint is generally limited to **ninety (90) days** from the date of the decision or the service received.

6.2.1 Types of appeals and complaints

Examples of types of appeals and complaints covered under this policy are set out in the table below:

Table 1: Types of Appeals and Complaints

Type of feedback, appeal or complaint	Example
Services	<ul style="list-style-type: none"> • Accessibility of Housing Plus services • Quality of Housing Plus services

	<ul style="list-style-type: none"> • Competence or conduct of Housing Plus employees, including contractors
Actions or decisions	<ul style="list-style-type: none"> • Inadequate consideration was given to individual circumstances • Incorrect or unfair • Reasons not properly explained
Inaction or delay	<ul style="list-style-type: none"> • Not responding to requests • Delay providing services • Inaction or delays not explained
Policy and procedure	<ul style="list-style-type: none"> • Policy or procedure not followed • Poor interpretation of a policy was followed • The procedure used to reach the decision was not fair or correct • The policy or procedure was not properly explained or accessible

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

- An initial request for a service or action
- Requests for information, updates or explanations that are in the process of being addressed
- Tenancy matters under the *NSW Residential Tenancies Act 2010* that fall under the jurisdiction of the NSW Civil and Administrative Tribunal (NCAT)
- Waiting times for housing assistance.

6.2.2 Facilitating appeals and complaints

All Housing Plus customers will be:

- Provided with information about how to make an appeal or complaint during the assessment process. This includes explaining the *Customer Feedback, Appeals and Complaints Policy* and fact sheet.
- Provided with multiple ways to make an appeal or complaint, including in person, over the phone, in writing, via email or online.
- Listened to, treated with respect by employees and actively involved in the appeals or complaints process where possible and appropriate; and
- Provided with reasons for our decision(s) and any options for redress, review or appeal.

6.3 How to appeal a decision or make a complaint

Housing Plus encourages customers to raise any concerns or issues as they arise with a Housing Plus employee who will work with the customer to resolve the matters raised. If

customers are unhappy with how their issue was dealt with, they can lodge a formal appeal or complaint.

A formal appeal or complaint can be made by email, letter, telephone, in person or by completing the form on the Housing Plus website found here:

www.housingplus.com.au/contact-us/compliments-complaints-feedback/customer-feedback-and-complaints-form

The appeal or complaint should detail:

- The problem or issue
- Any action taken that has already been taken to resolve the problem or issue
- Any responses or communication that has been received
- The action or outcome that is sought.

6.3.1 Accessibility

Housing Plus provides accessible ways for customers, particularly those who require assistance, to provide feedback or make a complaint. 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: Eg.
 - Disability Information and Advocacy service
 - Tenants Advice and Advocacy service
- Providing easy English or accessible feedback and complaints forms.
- Being responsive to a customer's cultural needs e.g. instructing a Housing Plus Identified employee to act as Complaints Investigator on behalf of an Identified customer.

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

6.3.2 Anonymous appeals and complaints

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

6.4 Receiving customer feedback, appeals and complaints

Housing Plus records all customer feedback, appeals and complaints in the Customer Feedback, Appeals and Complaints Register. Feedback and complaints will be assigned to a Complaint Investigator who is responsible for managing the feedback and complaints process.

Internal appeals are reviewed by the Executive Management. This can then be escalated to the Chief Executive Officer. The Chief Executive Officer will determine the decision of the appeal.

The record of the customer feedback, appeal or complaint documents:

- The name and contact information of the customer providing the feedback, appeal or complaint
- The service the feedback, appeal or complaint relates to
- Issues raised by the customer providing the feedback, appeal or complaint and the outcome(s) they want
- If they require an employee to contact them regarding their feedback, appeal or complaint
- Customer demographics e.g. Aboriginal or Torres Strait Islander, culturally or linguistically diverse, young person (18-24), older person (55+) or person with disability
- The assigned Complaints Investigator.

All customer feedback appeals and complaints must be recorded, 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.

6.4.1 Ministerial complaints

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

6.4.2 Complaints involving the Chief Executive Officer

A complaint involving the Chief Executive Officer must be reported to the Chair of the Housing Plus Board of Directors to action.

6.4.3 Unreasonable complainant conduct

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

6.4.4 Acknowledging customer feedback, appeals and complaints

Housing Plus acknowledges customer feedback, appeals and complaints within **seven (7) working days**.

Housing Plus responds to customer feedback, appeals and 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 way of communicating (e.g. email, letter, telephone call) with the customer based on their needs.

Our acknowledgement will include:

- Information about the customer feedback or 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.

6.4.5 Investigating customer feedback, appeals and complaints

If the customer feedback, appeal or complaint requires a formal response, Housing Plus will resolve the issue within **twenty one (21) working days** and provide a response. Actions to investigate the issue must be recorded in the Customer Feedback, Appeals and Complaints Register.

If Housing Plus is unable to resolve the issue within 21 days, the Complaints Investigator will:

- Seek approval in writing from the Executive Management to extend the timeframe for our actions
- Contact the customer by telephone if possible, or otherwise in writing
- Advise them of the reasons for the delay; and
- Advise them of a new target resolution date.

6.4.6 Proposing and implementing a resolution

Once a decision has made by the Complaints Investigator, it will be actioned.

6.5 Closing customer feedback, appeals or complaints

Once the feedback, appeal or complaint is actioned, the Complaints Investigator will update the *Customer Feedback, Appeals and Complaints Register* 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.

6.5.1 Providing a reason for a decision

The Complaints Investigator or Executive Management will contact the customer and advise them of:

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

If it appears that the outcome of an internal appeal will not be in the customer's favour, Housing Plus will offer a phone or face to face interview before the review is completed. This gives the customer an opportunity to explain the reasons they think the decision should be changed, to understand Housing Plus's decision-making process and to provide any relevant, further information.

In all cases, consideration will be given to the most appropriate way of communicating (e.g. email, letter, telephone call) with the customer based on their needs.

6.5.2 Further action and other avenues

If a customer is not satisfied with Housing Plus’s response, they have the option to escalate to Executive Management for investigation. A response will be provided by Housing Plus within **ten (10) working days**.

If a customer is not satisfied with the outcome of their appeal, they can lodge an external appeal with the Housing Appeals Committee (HAC). The HAC is an independent agency which hears appeals that relate to certain decisions made by community housing providers. Housing Plus will provide customers with information regarding the HAC process.

There are a variety of external avenues available if a customer is not happy with the outcome of their complaint. Avenues for external review are included in the table below:

Table 2: Available External Avenues for Unsatisfactory outcomes of Their Complaint

External agency	Contact details/ further information
Housing Appeals Committee	www.nsw.gov.au/departments-and-agencies/housing-appeals-committee
Local Member of Parliament	https://www.parliament.nsw.gov.au/members/pages/all-members.aspx
NSW Civil and Administrative Tribunal (NCAT)	www.ncat.nsw.gov.au
Australian Investment and Securities Commission (ASIC)	www.asic.gov.au
NSW Ombudsman	www.ombo.nsw.gov.au
Anti-Discrimination NSW	www.antidiscrimination.nsw.gov.au
Australian Human Rights Commission	www.humanrights.gov.au
Registrar of Community Housing	www.rch.nsw.gov.au/enquiries-and-complaints
CHIA NSW	www.communityhousing.org.au
NSW Department of Communities and Justice	www.dcj.nsw.gov.au
Tenants Advice and Advocacy Service	www.tenants.org.au/get-advice

6.6 Record keeping

Customer feedback, appeals and complaints are treated as confidential. If information relating to customer feedback, appeals or complaints is requested by an external party (e.g. Housing Regulator, HAC or complainant), we will consider the circumstances of the request and, if necessary, seek legal advice before sharing the information.

Records of customer feedback, appeals and complaints are maintained for a minimum of **seven (7) years**.

6.7 Reporting

Housing Plus undertakes reviews of customer feedback, appeals and complaints to inform ongoing organisational learning and continuous improvement. Regular analysis of customer feedback, appeals and complaints is undertaken by Housing Plus to monitor trends, measure the quality of our service delivery and make improvements.

Housing Plus reports on customer complaints, appeals and feedback internally once per month. We also report to external agencies as required by contractual, legal, or regulatory requirements. Details included in the reporting may include:

- The number of feedback, appeals and complaints received
- Details of feedback, appeals and complaints received including:
 - Date received
 - Description of feedback, appeal or complaint
 - Complaint, appeal or feedback type
 - Nature of appeal, feedback or complaint
 - Appeal, complaint or feedback outcome
- The number of requests we receive for internal and external review
- Customer demographics e.g. Aboriginal or Torres Strait Islander, culturally or linguistically diverse, young person (18-24 years), older person (55+) or person with disability.

Housing Plus publicises de-identified customer feedback, appeals and complaints record data.

6.7.1 Reporting to the Board of Directors

The Board of Directors, executive 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 Chief Executive Officer.

Annually, the Chief Executive Officer will provide the Board of Directors with an analysis of the previous year's appeals and 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.

6.7.2 Reporting to the Registrar

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 Investigator identifies a complaint of this nature, they must advise Executive Management immediately. The Executive Management will determine whether to notify the Registrar.

7 Appeals and Reviews of Decisions

Decisions made under this policy can be reviewed or appealed. For more information, refer to the *Customer Feedback, Appeals and Complaints Policy*.

8 Document Control

8.1 Document History

Action	Responsible Person	Date
Created draft	Therese Short Liz Stamatelos Lena Jenson Harmony Meath Chris Maybin	August 2024
Reviewed by	Liz Stamatelos	December 2024
Approved by	Justin Cantelo	February 2025