

# COMPLAINTS MANAGEMENT POLICY



## 1. Purpose

To outline how Evolve Housing will manage complaints made by external persons or organisations.

## 2. Scope

This policy refers to complaints which are defined as:

- Decisions which can be appealed, for example, a social housing tenancy decision
  - These are covered by Evolve Housing's Appeals Policy
- Complaints between an Evolve Housing resident and an external contractor not engaged by Evolve Housing
  - In certain cases, Evolve Housing may adopt a support role to facilitate a resolution
  - Evolve Housing reserves the right to determine if it is appropriate to support the resident and the extent of that support
- Complaints related to neighbour disputes, nuisance and annoyance
  - These are covered by Evolve Housing's Neighbour Disputes and Nuisance Policy
- Internal complaints between employees of Evolve Housing
- Service requests such as:
  - requests for approval
  - requests for action
  - inquiries about Evolve Housing's business
  - requests for explanations of policies
- Feedback including opinions and comments which do not require a response
- Issues that fall outside the jurisdiction of Evolve Housing such as:
  - Centrelink fraud
  - Child abuse

- Drug dealing
  - the person is to be referred to the appropriate body to lodge a complaint, such as: Centrelink, Child Protection Agency, Ombudsman and NSW Police

## 3. Policy statement

It is the policy of Evolve Housing to aim to resolve complaints as effectively and efficiently as possible by ensuring the process is: visible, accessible, responsive, objective, and evidenced based. This includes addressing any cultural, linguistic, physical or intellectual needs of the complainant or their advocate. We value complaints as they assist us to improve our services.

## 4. Guiding principles

The following guiding principles are to be used to manage complaints.

### Visibility

The complaints management process is to be highly visible and promoted through a range of mediums.

### Accessibility

Information on the complaints process is to be:

- easily available
- easy to find
- easy to understand
- easy to use; and
- available in different formats

### Responsiveness

Complaints are to be acknowledged, and complainants are to be kept informed of progress within policy

timeframes. However, if for any reason this is not possible, complainants are to be notified of any delay by telephone and/or in writing.

Our responsiveness is dependent on:

- the health, safety and security of our staff, and
- our ability to allocate our resources fairly across at the complaints we receive

When a complainant behaves unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. We will endeavour to be proactive and decisive in managing any conduct that negatively and unreasonably affects us and will support our employees in doing the same.

## Objectivity

Complaints are to be dealt with in an unbiased manner by ensuring:

- openness – the process must be clear
- impartiality – the process must be fair, treated as legitimate and investigated without prejudice
- equitability – equal access and treatment are to be given to all people involved
- sensitivity – due care is to be given to individual differences and needs.

## Evidence based

Facts and data are to be used to establish the relevant details of the situation. Decisions and recommendations regarding a resolution to a complaint must be based on sound evidence collected from a thorough investigation of the complaint.

## Confidentiality

A complainant's identity and personal details should be protected, for example, by using a unique identification number (ID) for each complaint.

A complainant's identity and personal details are only to be disclosed to the extent necessary to undertake an investigation.

For further information refer to Evolve Housing's Complaints Management Procedure and Privacy Policy.

## 5. Complaints officer role

The Complaints Officer is designated by Evolve Housing to oversee the complaints management system. All complaints should be forwarded to this person and they are responsible for the accurate recording of each complaint and the management of the Complaints Register. The Complaints Officer is to remain at arm's length of the complaints and is to ensure that the process for addressing the complaint complies with this policy. The Complaints Officer should not be seen as the person whose job it is to 'fix' the complaint. All staff are responsible for ensuring the complaints management system is supported with the overall aim being to educate everyone on how to improve customer service and business outcomes.

## 6. Complaints management stages

### Initial Assessment

Once a complaint has been received, either verbally or in writing, the complaint is to be assessed against, for example:

- urgency / seriousness
- severity
- safety implications – immediate and longer term
- complexity
- potential impact on the individual, Evolve Housing or broader housing community.

In circumstances where a matter requires immediate action to mitigate serious, or potentially serious risk factors, then the matter may be referred immediately to the relevant Evolve Housing employee. Once the seriousness of the complaint has been addressed, the complaint is to be referred to the Complaints Officer for processing.

For all other circumstances, complaints should be forwarded to the Complaints Officer who will further assess the matter. If it is assessed as requiring further investigation, the Complaints Officer will delegate the investigation to an appropriate Evolve Housing

employee or representative – the Investigating Officer. A representative could include a third party engaged by Evolve Housing specifically to investigate the complaint.

All complaints received in writing are to be acknowledged within two (2) business days of being received.

### **Investigation of complaint**

The Investigating Officer is to ensure that all relevant information surrounding the circumstances of the complaint is collected and recorded. The level of investigation undertaken should be commensurate with the seriousness, frequency of occurrence, and severity of the complaint. This process may require contacting the complainant to discuss the complaint in more detail. The Investigating Officer will need to use sound judgement in determining the extent of the investigation and should liaise with the Complaints Officer to discuss their intentions and actions.

An investigation and written response is to be completed by the Investigating Officer within twenty (20) business days and provided to the Complaints Officer. The Complaints Officer will review the investigation and response to ensure the appropriate steps were taken.

### **Outcome of investigation**

The Complaints Officer and Investigation Officer, in conjunction with relevant Evolve Housing employees, will determine an appropriate action/s to resolve the complaint. The Complaints Officer will inform the complainant verbally and/or in writing of the outcome and actions taken by Evolve Housing. It is important to reassure the complainant that Evolve Housing has done a thorough investigation, whilst at the same time informing them that this is our final decision on the matter.

If the complainant is dissatisfied with the outcome and has new evidence/information in relation to their complaint, the complainant can seek a review. The matter will be referred back to the original investigating officer for review and the investigation will follow the same procedure as the original complaint.

If the complainant is dissatisfied with the outcome but does not present any new evidence, the complainant is to be advised that they may wish to seek an external review of the complaint. The complainant is to be referred to relevant services which they may choose to contact. For example:

- the Tenant Advice Advocacy Service – NSW Fair Trading
- the Community and Private Market Housing directorate (CAMPH)
- NSW Ombudsman

Evolve Housing reserves the right to implement any recommendations and actions that come from the investigation or review of a complaint, regardless of whether the complainant considers them to be satisfactory to their individual case.

## **7. Anonymous complaints**

There will be times when a complainant may wish to remain anonymous. It can be difficult for an organisation to address complaints from an anonymous complainant and the complainant is to be advised of this, where possible, at the time of making the complaint. It is though, good practice to record anonymous complaints in order to assess whether any patterns or systemic issues emerge over time that could be addressed more generally, for example, through training. Any anonymous verbal complaints should be recorded by completing a Complaints Form and forwarded to the Complaints Officer. Any anonymous written complaints are to be forwarded to the Complaints Officer.

## **8. Complaints about Evolve Housing employees or volunteers**

A complaint can refer to an Evolve Housing employee or volunteer that relates to, for example, a Code of Conduct matter or other alleged misconduct. For these complaints, a complainant can only be advised as to the status of the complaint. That is, they are not to be given sensitive or personal information about the employee/volunteer or specific details about the nature of the investigation.

## 9. Authority, education and training

Staff who are required to resolve or investigate complaints are to be adequately equipped to respond to complaints, including having the appropriate authority, training, and supervision.

## 10. Recording - complaints management register

Records of each complaint and any actions taken are to be formally recorded and managed in an appropriate complaints management register. Each complaint is to record a summary of the complaint, the finding and action taken. The complaints management register is to support the ability of Evolve Housing to, for example, monitor categories of complaints, number of complaints, range of outcomes, and ability to assess the impact of any recommendations implemented over time.

## 11. Review and audit of complaints management

Evolve Housing will regularly review and audit complaints management against, for example:

- the policy and procedures – including the guiding principles
- performance
- outcomes; and
- feedback about the complaints process itself.

Outcomes of a review or audit will be used to improve complaints management.

## 12. Definitions

- **Complaint** - A complaint is an expression of dissatisfaction relating to Evolve Housing actions, decisions, services or alleged misconduct by staff members made by external persons or organisations, where a response or resolution is explicitly or implicitly expected
- **Complainant** - The person who makes the complaint – this person may be representing another person
- **Complaints Officer** - The person authorised

by Evolve Housing to manage the complaints management system

- **Investigating Officer** - The person authorised by the Complaints Officer to undertake an investigation of a complaint

## 13. Related documentation

- Complaints Management Procedure
- Feedback Form
- Complaints Fact Sheet

### More information?

For more information about your tenancy go to [www.evolvehousing.com.au](http://www.evolvehousing.com.au)