

## Introduction

The National Regulatory System for Community Housing (NRSCH) requires that a Community Housing Provider (CHP) be *'fair, transparent and responsive'* in managing and addressing compliments, complaints and appeals relating to the provision of housing services.

As a Community Housing Provider, Common Equity Housing SA Ltd (CEHSA) recognises the importance of transparency, and that it must take reasonable steps to be accountable to its members/tenants, with compliment, complaint and appeal policies and guidelines in place that provide its members/tenants adequate opportunity to raise concerns about how the organisation is governed.

CEHSA also acknowledges that both compliments and complaints provide valuable feedback about the level of satisfaction and/or effectiveness of services, the aspects of a service that are most meaningful to people, examples of good practice, employee efforts, and an opportunity to improve the delivery of services.

## Purpose

This Compliments and Complaints Management Policy is intended to ensure that we handle compliments and complaints fairly, efficiently and effectively, and covers complaints brought by individuals and/or CEHSA Member Organisations (MOs) against services provided by CEHSA, or against persons acting on behalf of CEHSA. This policy sets out how we will listen and respond to compliments and complaints, and aims to promote a consistent approach across CEHSA for responding to, managing, processing and recording compliments and complaints:

- to ensure procedural justice and transparency to all people who are involved with complaints or concerns for which CEHSA has responsibility.
- to clarify the persons responsible for addressing compliments and complaints, and the procedures and principles they are to use to manage and resolve complaints
- to provide the principles, structures, systems and processes to be used by CEHSA to improve its operations to reduce the likelihood of a recurring complaint

This policy provides direction to our employees and people who wish to make a complaint on the key principles and concepts of our compliments and complaint management system, but does not apply to complaints brought by members/tenants of MOs against their specific organisation (i.e. their Volunteer Member-Tenant Managed Housing Provider). These complaints are to be handled by the MOs in line with their own approved policies and procedures for complaints and appeals.

## Guiding principles

CEHSA is committed to ensuring opportunities for individuals and MOs to provide feedback on all aspects of its services in various ways, and to resolving complaints at the earliest opportunity, in a way that respects and values feedback. The five fundamental principles of fairness, accessibility, responsiveness, efficiency and integration guide the compliments and complaints management system:

- complaints must be handled effectively and promptly, and recorded for coordination, analysis and reporting
- all comments on the standards of services are considered and where appropriate acted upon, with feedback as required to the person making the complaint

- all complaints are dealt with within the published timescales and to the satisfaction of both the complainant and ourselves
- any improvements to our policies and procedures identified as a result of a comment or complaint are implemented

## Terms and definitions

### Complaint

A complaint can be described as, “Expression of dissatisfaction made to or about us, our services, products and/or complaint-handling, where a response or resolution is explicitly or implicitly expected, or legally required.”

There will be no distinction made for degrees of severity of complaint. The word “complaint” will be used and will include e.g. formal complaint, expression of dissatisfaction, adverse comment or any other terminology to indicate disappointment with CEHSA.

A complaint covered by this Policy can be distinguished from:

- bullying, harassment & discrimination issues (see our Bullying, Harassment & Discrimination Policy and Procedure)
- public interest disclosures made by our staff (see our media relations policy)
- code of conduct complaints (see our code of conduct & ethics policy)
- requests for feedback about the standard of our service provision (see the definition of ‘feedback’ below)
- service requests (see definition of ‘service request’ below), and
- requests for information (see our access to information policy).

### Complainant

The party making the complaint.

### Complaint management system

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

### Compliment

A compliment can be described as polite and/or positive expression of praise or admiration to or for someone, or something.

### Dispute

An unresolved complaint escalated either within or outside of our organisation.

### Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services, products and/or complaint-handling where a response is not explicitly or implicitly expected or legally required.

### Service request

- requests for approval
- requests for action
- routine inquiries about the company’s business
- requests for the provision of services and assistance
- reports of failure to comply with laws regulated by the organisation
- requests for explanation of policies, procedures and decisions

## Key Elements

CEHSA's compliment and complaint management process is based on the following elements:

### Visibility and accessibility

The management system will be visible and accessible to individuals and:

- explain how and where to make a compliment or complaint, including an anonymous complaint
- consider specific needs of the individual or barriers they may experience
- explain alternative complaint resolution pathways when the complaint is first lodged and when it is closed
- explain how CEHSA will manage a complaint and the expected timeframe for resolution
- support individuals so that they can identify and seek their preferred outcome

### Responsiveness

The management system will be responsive and provide mechanisms and strategies to:

- promote client rights, particularly those with special support needs, so they can actively participate in the compliments and complaints process
- inform and train employees to use the compliment and complaint management system
- support the complainant to seek the most appropriate resolution
- ensure there is clarity about the requested outcome
- provide a respectful, valuing and informative acknowledgement
- actively listen, empathising and acknowledging when the service was not the best it could have been
- monitor timeframes for resolution
- communicate with all relevant parties about the progress to resolve the complaint

### Assessment and investigation

The management system will have mechanisms and strategies to:

- assess complaints for severity, safety, complexity, impact and the need for immediate action
- collect adequate and appropriate information to inform systemic improvement
- protect the privacy and confidentiality of the information people have provided
- determine by whom and at what level the complaint should be dealt with
- enable complaints to be considered independently, fairly and objectively

### Feedback

The management system will provide mechanisms and strategies to:

- explain what happened and why, what will be done to fix the issue, who will do it, how we will communicate our progress and how we will check things are on track
- explain the reasons for the decision
- provide information on appeals processes should the complainant want to appeal the decision
- provide an apology – where an apology is provided, ensure it is sincere, and accepts responsibility for what occurred and the impact
- explain the circumstances without making excuses, and summarise the key actions that will be taken
- provide regular updates to the complainant if the resolution is delayed
- notify the complainant of alternative complaint resolution pathways and review mechanisms
- follow up with complainants to determine the effectiveness of the outcome, where appropriate

### Improvement focussed

The management system will provide mechanisms and strategies to gather and record feedback and other information to:

- meet any statutory, policy or procedural reporting requirements
- improve the training and capabilities of complaint management employees

- analyse the complaint data and identify complaint trends for performance improvement
- monitor the time taken to resolve complaints
- notify service providers of any changes necessary arising from a complaint as part of a continuous quality improvement approach
- any improvements to our policies and procedures identified as a result of a comment or complaint are implemented

### Authority

CEHSA's authority for managing Complaints is based in its Constitution.

### Other compliment and complaint avenues

- [Office for Housing Regulation](#)
- [South Australian Civil and Administrative Tribunal](#) (SACAT)
- [Renewal SA](#)
- [State Ombudsman](#)

### Associated CEHSA documents

- CEHSA Code of Conduct & Ethics Policy
- CEHSA Risk Management Policy
- CEHSA Compliments and Complaints Management Procedure Flow Chart
- Compliment and Complaints Register (Chintaro)

### Additional Information

- Additional Information in the form of [NRSCH fact sheets](#) can be obtained from the NRSCH website.
- [Ombudsman complaint management framework](#)
- [Public and Community Housing Appeal Unit](#) (PCHAU)
- [NRSCH Evidence Guidelines, Performance Outcomes](#)

Document History	
Version 3	14 December 2017
Version 2	14 August 2014
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