



COMPLAINTS POLICY

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1. PURPOSE

This policy establishes the principles and procedures SPCHG will adhere to in managing complaints.

2. SCOPE

This policy applies to complaints and appeals made to SPCHG by:

- tenants of SPCHG in respect of rental housing;
- people seeking tenancy in social housing managed by SPCHG;
- people whom SPCHG has assisted to make an application for social housing under the Victorian Housing Register (VHR);
- clients who utilise the Youth Housing Support Program;
- A neighbour or member of the community;
- An advocate or representative of a tenant, client or other person accessing our service.

3. PRINCIPLES

All tenants, clients and applicants have the right to:

- complain about the way that SPCHG has gone about delivering housing or related services; and
 - appeal a decision made by SPCHG in relation to their housing, application or services.
- SPCHG views complaints as: an important source of feedback to assist SPCHG to review and improve its policies and practices;
- a basic right of all citizens.

SPCHG will:

- provide tenants, clients and applicants with clear information about
 - how they can make a complaint or lodge an appeal with SPCHG and
 - how to contact external complaint-handling bodies that are relevant (such as DHHS or the Housing Registrar);
- support tenants, clients and applicants to make a complaint or appeal in a way that is accessible to them;
- advise tenants, clients and applicants of their right to use an advocate to represent or support them in the process;
- respond to complaints and appeals fairly and transparently;



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- respond to complaints and appeals promptly (within 30 days);
- respect the privacy and confidentiality of tenants, clients and applicants who make a complaint or lodge an appeal;
- keep records of complaints made and appeals lodged.
- ensure that processes are thorough, consistent and timely, all staff are trained, and that all complaints are dealt with.
- ensure that all complaints, where possible and appropriate, are fully resolved to the satisfaction of the person making the complaint.
- ensure effective communication throughout the complaints process.
- ensure that complaints data is used to inform review of SPCHG policies and practices.
- ensure that all complainants are made aware that they may appeal to 'higher' authorities or other complaints resolution bodies.

4. DEFINITIONS

4.1. FEEDBACK

Feedback is a general term for any communication back to SPCHG on any issue. It can be positive or negative. Not all feedback, even negative feedback, meets the definition of a Complaint.

4.2. COMPLAINTS

A Complaint is a particular type of negative feedback that also meets the following criteria.

1. It is an expression of dissatisfaction with any action, decision or lack of action on the part of SPCHG staff or contractors.
2. It is related to an issue for which SPCHG has some level of responsibility.
3. The person providing the feedback wants their negative feedback to be formally registered as a Complaint and to be handled through the SPCHG complaints process.

A Complaint can be made in person, through a phone call or in writing.

A Complaint can be made by a client, a tenant, a neighbour or a member of the community.

A Complaint can be made directly by the complainant or by an advocate or representative.

Examples:

A complaint is not: *"the hot water service in our house is not working"*. This is a maintenance notification.

A complaint is: *"I reported the faulty hot water service last week and nothing has been done"*

A complaint is not: *"My neighbour, Julie, always has her music on too loudly"*.



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This is a request for SPCHG to take some initial action.

A complaint is: *“I have been telling you about Julie’s loud music for 3 months and nothing has been done.”*

A complaint is not: *“my neighbour was rude to me.”*

A complaint is: *“my worker spoke nastily to me.” Or “my worker refused to help me.”*

5. POLICY GUIDELINES

5.1. COMPLAINTS BY TENANTS, OR PROSPECTIVE TENANTS ABOUT RENTAL HOUSING

Tenants or prospective tenants of SPCHG who are affected by decisions of SPCHG on matters relating to rental housing may ask for their complaint to be dealt with under the complaints procedure.

Under this procedure, SPCHG must take all reasonable steps to resolve such complaints within 30 days after the complaint is made to SPCHG.

An individual who is a tenant or prospective tenant of SPCHG and who has made a complaint to SPCHG may refer the complaint to the Housing Registrar for investigation if the complaint is not resolved within 30 days after it is made.

5.2. COMPLAINTS BY CLIENTS REGARDING A SERVICE PROVIDED

Clients of SPCHG who are affected by decisions relating to case management as part of the service provided may ask for their complaint to be dealt with under the complaints procedure.

Under this procedure, SPCHG must take all reasonable steps to resolve such complaints within 30 days after the complaint is made to SPCHG.

5.3. COMPLAINTS OR APPEALS ABOUT APPLICATIONS FOR SOCIAL HOUSING UNDER THE VICTORIAN HOUSING REGISTER (VHR)

SPCHG participates in the VHR by:

- providing applicants with information about applying for social housing under the VHR;
- assisting applicants to make an application for social housing;
- submitting applications to DHHS with a recommended outcome based on the VHR’s eligibility criteria.

Where an applicant wishes to:

- make a complaint about the way in which SPCHG has provided service to them in making an application for social housing; or
- appeal a decision made by SPCHG in relation to the person’s application for social housing to:
 - recommend or not recommend an application for approval;
 - approve or not approve an application;
 - remove an application from the register; and
 - determine if an offer of social housing is a reasonable offer,

then such applicants should first should ask that the complaint be reviewed or decision be reconsidered by SPCHG under the complaints and appeals procedure.



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Applicants for social housing who are unhappy with the resolution of a complaint under the complaints and appeals procedure may refer the complaint to the DHHS Housing Appeals Office.

6. COMPLAINTS PROCEDURE

The following procedures apply in all cases where a tenant, client, neighbour or other community member gives negative feedback or expresses their dissatisfaction with a service that SPCHG has provided.

Steps 1-4 will be the responsibility of the staff member who initially responds to the person expressing their dissatisfaction. This may be the housing worker, support worker, person taking the call or the person at reception.

STEP 1. DECIDING WHETHER THE FEEDBACK IS A COMPLAINT.

The first step is to decide whether the negative feedback meets the definition of a complaint. The staff member taking the complaint needs to make this decision by answering the following three questions.

1. Is this feedback an expression of dissatisfaction with any action, decision or lack of action on the part of SPCHG staff or contractors?

If **YES**. Ask question 2.

If **NO**. Listen to the feedback and decide on the appropriate response. This may include asking the person to complete a **Feedback Form** [spchg feedback form pcsm draft 17jul17.doc](#) or making a referral to another agency.

2. It is related to an issue for which SPCHG has some level of responsibility?

If **YES**. Ask question 3.

If **NO**. Listen to the feedback and decide on an appropriate response. This may include asking the person to complete the **Feedback Form** or referring the person to the organisation who has responsibility for the particular issue.

3. Does the person providing the feedback want their feedback to be formally registered as a Complaint and handled through the SPCHG complaints process?

In the context of asking this question the staff member provides the following explanations.

- SPCHG encourages people to make complaints and that there will be no negative consequences for the person if they register a formal complaint.
- Registering a complaint means that there will be a formal process to attempt to resolve the issue over the next 30 days.

If **YES**. The feedback is formally registered as a complaint and handled through the SPCHG complaints process.



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If **NO**. Listen to the feedback and decide on an appropriate response. If the issue is serious this may include the following actions.

- noting the issue on Chintaro or SHIP.
- referring the issue to a Manager or the CEO.

STEP 2. REFERRING ANY COMPLAINTS ABOUT STAFF OR CONTRACTOR MISCONDUCT TO THE CEO.

If the complaint includes any allegations of misconduct by a particular staff member, or contractor, the complaint must be referred to the CEO. If the allegations include any allegations of misconduct by the CEO the complaint will be referred to the Chairperson.

STEP 3. RECORDING A FORMAL COMPLAINT ON THE COMPLAINTS FORM

In all other cases the next step will be to complete the **Complaints Form**. [spchg complaint form pcsdm draft 1 14jul17.doc](#) This may be completed by the person making the complaint or completed by the staff member. The person may be invited to come to the office to complete the form or a copy of the form may be mailed or emailed. Copies of the form will be available at the Office front desk. The form will be available on the website. If completed by the person making the complaint the form needs to be checked by the staff member to ensure the information is clear and complete.

STEP 4. ALLOCATING RESPONSIBILITY FOR RESOLVING THE COMPLAINT

All completed Complaint Forms must be scanned and filed in a secure folder on the server. All completed Complaint Forms will be given to the following SPCHG staff members depending on the service area. Once the complaint is resolved these senior staff members must pass all completed Complaints Forms to the MCS. The MCS will store the Complaints Forms in the Finance /Admin Filing Cabinet.

SPCHG Service Area	Staff Position
Community Housing	Manager Housing Operations
Youth Support Program	Team Leader
Organisational Admin.	Manager Corporate Services

The responsible senior staff member in each area will then take responsibility for completing the next steps. If one of those people is on leave, the complaint may be managed by any of the others or the CEO.

STEP 5. REGISTERING A COMPLAINT ON THE SPCHG COMPLAINTS REGISTER



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The details of the complaint, including the name of the senior staff member responsible for resolving the complaint, must then be entered into the Complaints Register. This is an excel spreadsheet contained in a folder on the Server. See the link below.

<\\SPCHGTS\Data\SPCHG Documents\COMPLAINTS\Complaints Register.xlsx>

STEP 6. COMMUNICATING WITH THE PERSON MAKING THE COMPLAINT

The person making the complaint must be contacted on a weekly basis, at a minimum, by the senior staff member during the complaints resolution process.



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STEP 7. INVESTIGATING THE COMPLAINT

The senior staff member must then undertake whatever reasonable actions are required to determine the facts surrounding the complaint and to propose a positive and reasonable solution that is consistent with SPCHG values and policy. This proposed solution will be discussed with other team members as required. If the solution requires any additional cost then the staff member will seek approval. A summary of the actions must be recorded in the Register.

STEP 8. COMMUNICATING A PROPOSED SOLUTION

The senior staff member taking responsibility for the complaint will:

- determine a proposed solution,
- communicate this in writing to the complainant,
- invite the complainant to a meeting to discuss (advising of the right to have a support person or advocate present) and attempt to reach an agreed position,
- record the discussion and resolution, if any, in the Complaints Register.

If agreement is reached the complainant will be required to sign off on the Complaints Form. The date of the meeting will be recorded as the complaint resolution date. A **FINAL LETTER** must be sent, including the following information.

- Date of Complaint.
- Summary of Complaint.
- Process to investigate the Complaint.
- Outcomes of the investigation.
- Proposed SPCHG Solution.
- Process to negotiate an agreed solution. Eg. Meetings and referral to CEO.
- Outcome of Complaints Process – agreement or no agreement.
- Date of Final Letter.

The proposed solution will then be implemented.

No further action will be taken.

If an agreed solution cannot be reached the complainant will be asked if they would like the matter to be referred to the CEO. If they agree for the matter to be referred to the CEO then this will be recorded on the Register. If they do not agree they will be given a copy of the **SPCHG COMPLAINTS BROCHURE** and encouraged to refer the complaint to an external agency. The date of the meeting will be recorded as the complaint resolution date. They will also be sent a **FINAL LETTER**.

STEP 9. REFERRAL TO THE CEO.

The CEO will be provided with all the relevant information relating to the Complaint. The CEO will make a decision to either uphold the proposed solution or to propose a new solution. The CEO may:

- Seek a meeting with the complainant, or
- Suggest that the matter be referred to an external regulator,



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- Suggest formal mediation. If the person is satisfied with the solution proposed by the CEO they will be asked to sign the Complaints Form. The date of the agreed solution will be recorded as the complaint resolution date. A **FINAL LETTER** will be sent to the person making the Complaint. The proposed solution will then be implemented. No further action will be taken.

STEP 10. REFERRAL TO AN EXTERNAL AGENCY

If the person is not satisfied with the solution proposed by the CEO they will be informed that the next step is to take their complaint to an external agency. In these cases the person will be given a copy of the SPCHG Complaints Brochure with the contact details of the following external agencies.

- Housing Registrar
- DHHS Housing Appeals
- VCAT
- Homelessness Advocacy Service
- TUV
- Human Rights and Equal Opportunity Commission

The date of the agreed solution will be recorded as the complaint resolution date.

A **FINAL LETTER** will be sent to the person making the Complaint.

STEP 11. COMPLETION OF COMPLAINTS REGISTER

The senior staff member initially responsible for resolving the complaint is responsible for fully completing all required details in the Complaints Register.

7. MONITORING AND REPORTING

The Complaints Register will be monitored on a quarterly basis by the PCSM.

Learning from complaints will be a standard agenda item at monthly staff meetings.

A report on Complaints will be provided by the CEO to the SPCHG Board on an annual basis.

8. POLICY FORMS

- BROCHURE [spchg complaints brochure draft 1. pcsm 23jun17.pub](#)
- FEEDBACK FORM [spchg feedback form pcsm draft 17jul17.doc](#)
- COMPLAINTS FORM [spchg complaint form pcsm draft 1 14jul17.doc](#)
- COMPLAINTS PROCESS FLOW CHART [complaints process final 20jul17.pdf](#)