Policy: Complaint Management		
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Policy Context:		
National Regulatory System for Community Housing (National Regulatory Code)	Performance Outcomes One - Tenant and Housing Service Two - Housing Assets Four - Governance Five - Probity Six - Management	
Guidelines and reference documents NSW Ombudsman Commonwealth Ombudsman	• AS 10002:2022 Guidelines for complaint management in organisations. • NSW Ombudsman — Effective Complaint Management Guidelines, 4th edition, 2024 • Commonwealth Ombudsman — Better Practice Complaint Handling Guide, 2023 • National Regulatory System for Community Housing — Complaints Management Framework for Community Housing Providers, 2022	
Other guidelines and legislation	• Child Safe Standards (2022)	

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1. Cultural Inclusion Statement

Homes North recognises that complaints may be experienced differently by Aboriginal people, people from culturally and linguistically diverse backgrounds, older people, people with disability, young people, and people who have experienced trauma, discrimination or disadvantage.

We are committed to providing complaint pathways that are culturally safe, accessible, respectful and free from discrimination. This includes listening without judgement, recognising the importance of family, kinship, community and cultural identity, and supporting people to make complaints in the way that is most comfortable and appropriate for them.

Where requested or appropriate, Homes North will support complainants to involve an advocate, support person, interpreter, Aboriginal-specific advocacy service, tenant advice service or other trusted representative. Homes North will take reasonable steps to reduce barriers to making a complaint, including barriers related to language, literacy, disability, age, digital access, fear of reprisal, mistrust of services, or previous negative experiences with systems.

Complaint information will be handled sensitively and confidentially, with personal information shared only where necessary, authorised or required by law. Homes North will seek to ensure that cultural identity, family circumstances, trauma history or support needs are not treated as barriers to being heard but are considered respectfully when deciding how best to communicate, respond and resolve concerns.

2. Purpose and Objectives

This policy explains how Homes North receives, manages and learns from complaints. The policy reflects NSW and Commonwealth Ombudsman better-practice guidance and is tailored to Homes North as a medium-sized, regional, not-for-profit community housing provider with a significant Aboriginal tenant, client and staff community.

3. Scope

This policy applies to service complaints from housing applicants/clients, temporary accommodation clients (current and former), tenants (current and former), neighbours, contractors, partner agencies and other stakeholders about our services, decisions, actions or conduct (including delays, inaction, or how we handled a previous complaint).

This policy does not cover employee employment grievances. These are managed under the following policies:

- Personal Grievance Policy
- Anti-Discrimination and Harassment Policy
- Equal Employment Opportunity Policy (EEO)

4. Policy Statement

We value complaints because they help us improve services and strengthen governance.

Homes North is committed to resolving complaints effectively, efficiently and fairly. We do this by:

- Implementing and maintaining this policy
- Training staff with specific roles to review, investigate and manage Category 2 and 3 complaints
- Training all staff and representatives in complaint handling
- Providing accessible and culturally safe complaint pathways
- Maintaining our complaints management system
- Using reporting and oversight to support timely handling and monitoring
- Analysing complaints and acting on systemic issues
- Regularly reviewing our complaints processes
- Ensuring people are treated respectfully, fairly and without fear of reprisal.
- Ensuring procedural fairness – complaints are assessed impartially and objectively.

5. Guiding Principles

We commit to the NSW Ombudsman's six principles and have aligned our guiding principles with the Commonwealth Ombudsman's person-centred approach as follows:

Principle	Our Commitment
1. Treating people with respect	We treat everyone respectfully, fairly and without bias. People raising concerns are listened to, taken seriously, and treated courteously at all times, regardless of the nature of the complaint or how it is expressed. We recognise that making a complaint can be stressful and aim to engage in a calm, professional and considerate way.
2. Clear information that's easy to access	We make it easy for people to understand how to make a complaint and what to expect from the process. Information about our complaint handling process is clear, accessible and available in appropriate formats, so that people are not discouraged or disadvantaged when raising concerns.
3. Communicating clearly	We keep people informed throughout the complaint process. This includes explaining the process, confirming receipt of complaints, providing updates where appropriate, and clearly communicating outcomes and reasons for decisions in a way that is easy to understand.
4. Taking responsibility	We take responsibility for managing complaints and ensure they are handled by appropriately trained staff. The relevant person or team takes ownership of each complaint, so people know who is managing their matter and do not have to repeat their concerns unnecessarily.

Principle	Our Commitment
5. Responding in a timely way	We respond to complaints as quickly as possible, while ensuring they are thoroughly assessed. Clear timeframes are provided, and we keep people informed if delays occur. Timely handling helps ensure issues are addressed early and fairly.
6. Being open and honest	We are open about how complaints are handled and how decisions are made, while ensuring we maintain privacy obligations to all parties involved. Complaints are recorded in a consistent way and used to identify improvements to services and systems. Where appropriate, information about complaints and outcomes is reported internally to support transparency and accountability.

6. Definitions

Appeal: A request to review a decision affecting an application, tenancy, rent assessment or charges. A second-tier appeal may be available for appeal applicants (appellants) via the NSW Housing Appeals Committee (HAC) for eligible decisions after the initial appeal to Homes North (a first-tier appeal).

Community issues and concerns: Tenancy or Temporary Accommodation matters raised by tenants, clients or community members (e.g., noise, vandalism, pets, anti-social behaviour involving clients or tenants). Managed by the Tenancy, Housing Options and Programs teams.

Complaint: Dissatisfaction with Homes North's services, staff, decisions/actions or delays where a response is expected. Also termed a service complaint.

Feedback: Compliments, comments or suggestions where no response is needed.

Service request: A request for help or a service (e.g., maintenance, application or transfer form).

Disputes: Matters that are legislative in nature, have a financial impact for Homes North, or challenge a complaint review outcome or decision (see Dispute Policy).

Unreasonable Complainant Conduct (UCC): Conduct (not the person) that creates health/safety risks or unreasonable impacts on staff time, resources or equitable service delivery (e.g., aggression/abuse, excessive contact or unreasonable demands). Homes North manages unreasonable complainant conduct in alignment with NSW Ombudsman guidance (see the Homes North Unreasonable Complainant Conduct Policy).

7. Complaint Service Standards

- We will acknowledge complaints within 3 business days via our online system automatic notification, or via email, text or phone.
- We aim to review and resolve straightforward complaints within 10 business days; complex/sensitive matters may take up to 30 business days.
- If it is not possible for us to finalise our review in this timeframe, we will update at least every 10 business days, explain why and provide an updated timeframe.
- Outcomes provided to the person making the complaint always include clear reasons within our privacy obligations and review options.
- Anonymous complaints may not receive acknowledgement or a response if no contact details are provided or the complainant selects that they wish to remain anonymous.

8. Process

Homes North's Complaints Handling Procedure (for staff) explains the process in detail. A summary for complainants is below.

For tenants, clients and community members, see also our factsheet: "How we manage your complaint".

8.1. How to make a complaint – No Wrong Door Approach

Homes North uses a **"no wrong door"** approach: this means we accept complaints in a variety of ways to help people reach the right pathway without repeating their story.

You can lodge a complaint:

- In person at any Homes North office by talking to a staff member.
- Request and complete a paper form at any Homes North office.
- Phone any Homes North office and talk to a staff member who can lodge your complaint.
- Complete our online feedback form via the **Have Your Say** tab on the Homes North website, which can be completed anonymously.
- Via letter addressed to our Armidale or Tamworth office.
- Via email to: haveyoursay@homesnorth.org.au.
- Through an authorised representative (e.g., advocate or legal representative).
- Tell us if you need support (e.g., interpreter, National Relay Service, alternative formats) so we can make reasonable adjustments.

8.2. Recording of personal information

When a person makes a complaint, they may provide sensitive or personal information which includes contact details. This information is kept within our system and details of complaints are not discussed with staff not involved with reviewing, investigating or responding to the complaint. Sensitive personal information is redacted from complaint files wherever possible.

8.3. Emailing complaints to individual staff or teams

Complaints sent to individual staff members or team email addresses are not prioritised or responded to more quickly because they have been sent directly to a person or team. Due to the high volume of emails received by Homes North, complaints received by email are referred for lodgement through our online complaint system. Once lodged, they are recorded, assessed and prioritised in the same way as all other complaints received.

8.4. Complaints via an authorised representative

Homes North will accept complaints from advocates and legal representatives on behalf of current and former tenants and clients. We need written authorisation (consent) to share information, which should be provided when the complaint is lodged.

The authorised representative will need to use one of the ways to make a complaint outlined under “No wrong door approach”.

If a representative is disputing a Homes North decision, see our Appeals and Dispute Policies.

8.5. When service requests and community concerns become complaints

A service request or community issue may become a complaint if the person is dissatisfied with how it was handled. We initially record service requests in our tenant and client systems, and the relevant teams provide a response.

However, if the person raising the request or concern is not satisfied with the response, the matter can be referred to our complaint management process by the complainant or a staff member as a complaint.

8.6. Access and support

Homes North is committed to ensuring that barriers to making a complaint are recognised and, where possible, removed.

Homes North provides multiple channels for complaints to be made as outlined in this policy.

Advocacy services are also available for tenants and clients who wish to seek advice around complaint lodgement.

These services include:

Aboriginal Tenants Advice and Advocacy Service

New England: Free call: **1800 248 913**

Central West, North West, Far West NSW

Free call: **1800 810 233**

New England and Western Tenant Advice and Advocacy Service

Free call: 1800 836 268

(See also our factsheet – "How we manage your complaint") and our website for more information.

Homes North Temporary Accommodation clients can access support from Specialist Homelessness Services in their area.

Tenant and client support service agencies can also assist in making a complaint.

8.7. Recording complaints

Homes North records all complaints in our complaint system, no matter how they are received.

Staff who receive a complaint by phone or email must lodge it in the online complaint form (via the staff portal). If the complaint is about them, they must refer it to Operations Support via haveyoursay@homesnorth.org.au.

8.8. Acknowledging complaints

Online complaints lodged by any person will receive an automated confirmation (if an email is provided) and a reference complaint number.

Complaints lodged by other methods are acknowledged within three (3) business days via phone, text or email.

8.9. Complainants who are young adults, children or people with a disability

Complaints involving young adults, children or people with disability may require external referral where the complainant does not have an authorised representative, to ensure they are supported during the complaint process.

Staff are required to refer any such complaint to their manager for review and escalation to the Risk and Compliance Analyst for assessment.

8.10. Classification of complaints

Complaints received are classified by assigned staff as follows:

Category	Explanation
1 - Early resolution	Early resolution at first contact (explanation, apology, quick fix, assisted referral). This includes issues lodged in the complaint system that are classified as service requests and referred back to the relevant team for response and action. These issues may not be lodged in the complaint system by staff if they are resolved at first contact but must be recorded in the tenant management system (Zavanti) in feedback or HOMES for TA clients. This must be verified by the Team Leader or Manager.
2 - Internal review	Internal review or facilitated resolution by a Team Leader, Manager or Specialist role when unresolved, complex or outside delegation.
2 - External referral	Complex or sensitive matters may include complaints where the complainant remains dissatisfied following an internal review and the matter has been formally referred by an external agency, such as the Community Housing Registrar, the NSW Minister for Housing's Office, a local Member of Parliament's office, or another relevant authority. This category also includes complaints that require referral to an external party for review, such as matters

Category	Explanation
	involving children, young people, people with disability, or other vulnerable individuals. These matters are reviewed/coordinated by the Compliance and Risk Analyst or external specialist as determined by the CEO.
Other external	These relate to dispute matters referred from Homes NSW, the Housing Appeals Committee or NCAT (tenancy matters), other regulators or via formal legal dispute. These matters are managed under our Appeal and Dispute processes.

8.11. Complaints excluded from the complaint management process

Complaints that include:

- Verbal threats or verbal aggression and/or offensive language directed at any person.
- Multiple complaints about the same issue within a 7-day period.

Will not be accepted for review and, if received via the online complaint form, will be rejected from the system.

Complainants may re-submit their complaint after removing any aggressive, threatening or offensive language directed at others.

If a complaint includes serious threats, Homes North may need to report the matter. This is because threats to people or property can be against the law.

8.12. Review of complaints

When reviewing complaints, Homes North will:

- Act impartially;
- Base decisions on relevant evidence;
- Provide the chance to respond to adverse information;
- Explain reasons for our decision within our privacy obligations to all parties.

Complainant privacy is protected. Information is shared on a need-to-know basis and de-identified for reporting wherever possible.

Homes North staff are directed to the procedure for handling complaints for more information.

8.13. Managing Unreasonable Complainant Conduct (UCC)

Homes North is responsible for prioritising the safety of our staff and managing the fair and equitable distribution of our resources. Making a complaint can be stressful for a person wishing to make a complaint; however:

- Verbal or physical acts of aggression, threats or intimidation towards Homes North staff at any time including during the receipt or review of a complaint will not be tolerated.
- Vexatious or multiple complaints received simultaneously about the same matter via various internal and external channels impact the resources we have available for the provision of services to tenants and clients.

When required, Homes North will apply proportionate communication strategies with complainants who we assess are demonstrating unreasonable complainant conduct and advise them of this decision, for example, adjusted or restricted communication channels and/or frequency.

Please refer to the Homes North Unreasonable Complainant Conduct Policy for more information.

Homes North will also support staff to manage the impact of unreasonable complainant conduct, including through debriefing, EAP and supervision.

8.14. Updating the complainant on complaint progress

The staff member assigned to review the complaint will provide progress updates approximately every 10 days following acknowledgement of the complaint. If Homes North is unable to complete the review within 30 days, the complainant will be advised and provided with an update on the expected timeframe.

Due to privacy obligations and security controls of the complaint management system, office and front-line staff are unable to advise of the progress of a complaint but can refer enquiries to the relevant staff member.

8.15. Advising the complainant of complaint outcome

The staff member assigned to review the complaint will communicate the outcome of the complaint review with the complainant, either verbally or in writing, which may include:

- Explaining why the problem occurred
- Giving reasons for decisions
- Overturning decisions or rectifying issues
- Apologising for impact on the person and for decisions where assessed as appropriate
- Providing further options for review if the complainant is dissatisfied with the outcome, such as the Appeals process and NCAT if the complainant is not satisfied with the outcome.

Where required, Homes North will also reach agreements with the complainant through mediation or other resolution approaches (see Dispute Policy).

8.16. Procedural fairness and privacy

Where a complaint involves allegations about a tenant or client, Homes North manages this information in accordance with its privacy and confidentiality obligations. Personal information will only be collected, used and disclosed for the purpose of assessing and responding to the complaint, and will be shared strictly on a need-to-know basis.

Where appropriate, the tenant or client may be advised of the substance of the complaint to ensure procedural fairness and to provide an opportunity to respond; however, identifying specific details of the complainant or other individuals will not be disclosed unless required or authorised.

Homes North cannot provide specific information about individual employees, internal employment processes, or any outcomes relating to employment matters. Information is managed sensitively and may be de-identified where possible.
This approach reflects Homes North's obligation to balance transparency with its responsibilities to protect personal information and ensure procedural fairness to all parties.

9. If a complainant is dissatisfied with the outcome of their complaint

If a complainant is dissatisfied with the outcome of their complaint, they can refer the matter as follows:
Noting that external agencies may only accept complaints that meet their jurisdiction and acceptance criteria.

Internal Mechanisms	External Mechanism
Homes North appeal process (see our Appeals Policy) Homes North dispute process (via tenant advocate or legal representative) (see our Disputes Policy)	Housing Appeals Committee (second-tier appeal) (1800 629 794) https://www.nsw.gov.au/housing-appeals-committee NSW Civil Administrative Tribunal 1300 006 228 NSW Registrar of Community Housing 1800 330 940

10. Roles and responsibilities in managing complaints

Role	Responsibility
All staff (employees)	Recognise and record complaints, resolve Category 1 complaints within delegation, and escalate when required for Category 2 and 3 complaints. Support complainants to make complaints by providing options, which may include recording the complaint in the complaint system.
Operations Support Team	Assists with triage of Category 1 and 2 complaints in complaint software, assistance with staff training in complaint system use, and coordination of Category 2 complaint responses if requested by the Chief Operating Officer. Coordinate and compile Ministerial and MP request responses for CEO/COO review as per delegation. Quality Assurance checks for Category 2 complaints.
Managers and Team Leaders	Implement procedures; build capability in teams to support early resolution to Category 1 and 2 complaints. Review and where necessary investigate for Category 2 complaints. Ensure complaints receive acknowledgement and response within service timeframes for category 1 and 2 complaints managed within their teams. Ensure service requests are managed by teams in accordance with customer service standards.

Role	Responsibility
Risk and Compliance Analyst	Complaint Management System owner and complaint management software administrator. Maintains procedures, training and quality assurance; assists with triage and Category 3 complaint reviews/investigations; oversees Ministerial response monthly reports for CEO approval and Member of Parliament requests when determined by the CEO; and supports reporting and continuous improvement. Quality Assurance of Category 3 complaints. Manages review and response of complaints notified to the Community Housing Registrar. Oversees mandatory referrals to external agencies as required.
Chief Operating Officer	Assign co-reviewer and approver to close Category 2-3 complaints. Reviews complaint management resolution timeframes via dashboards and reports. Approval of Category 2 Member of Parliament responses when required. Oversees Privacy related complaints.
Chief Executive Officer	Approves the policy, champions complaint culture, appoints a senior owner and ensures public accessibility. Assigns a co-reviewer and approver to close Category 2 and 3 complaints. Reviews complaint management resolution timeframes via weekly reports to Executive. Approves Ministerial responses. Approves Member of Parliament responses for Category 2 and above, where response is requested by the Member. Approval of mandatory referrals to external agencies arising from complaints.

Role	Responsibility
Homes North Board	Receives regular reports via the Audit and Risk Committee (volumes, timeliness, themes, systemic risks); ensures resourcing to effectively manage complaints. Reviews (via ARC) the de-identified complaint register at least annually.

11. Recording, reporting and learning

All complaints are recorded in Homes North's complaint system with a unique ID, and we capture issues, actions, decisions, outcomes, remedies and systemic themes. We produce regular reports for leadership and track improvements to processes and systems.

Training for employees (staff) is role-based with general training on complaint handling principles for all employees on induction.

Training for managers and team leaders and specialist roles occurs via external specialist courses.

12. External review and mandatory referrals

Depending on the matter contained within the complaint, external avenues/referrals Homes North may receive and employ include:

- Housing Appeals Committee (HAC) – independent second-tier housing appeals.
- NCAT – tenancy disputes under the Residential Tenancies Act.
- NSW Community Housing Registrar (for complaints impacting the reputation of the sector).
- NSW Police (criminal conduct).
- ICAC (corrupt conduct).

- NSW Ageing and Disability Commission (suspected abuse of older people or people with disability).
- NDIS Commission (suspected abuse of people with disability).
- Office of the Children's Guardian (reportable conduct).

Documents related to this policy	
Related policies	• Unreasonable Complainant Conduct (UCC) • Appeal • Dispute • Code of Conduct • Work Health and Safety
Forms or other organisational documents	• Complaint Handling procedure • Unreasonable Complainant Conduct procedure • How we handle complaints at Homes North factsheet