

COMPLAINTS & FEEDBACK POLICY

COMPLAINTS & FEEDBACK POLICY

Policy Category	Tenant and Housing Services	Group Application	BHC Group
Drafted by	Operations Manager	Version	V4
Delegated updates	PMO	Last approved	September 2020
Responsible person	CEO	Scheduled review date	June 2022

Purpose

The purpose of this policy is to ensure that BHC Group and its related entities (BHC) have a consistent, systematic approach to managing and monitoring feedback on its services and decisions.

Complaints and feedback provide valuable information to allow us to continually improve and monitor our customer service and relationships. This policy outlines the way BHC manages complaints about its service delivery, reviews the decisions it has made and manages compliments about service delivery.

The nature of Tenancy Management likely results in grievances/issues/concerns (matter) being raised on a day to day basis. This forms a part of our normal operations, and it is expected that the Housing Manager/Property Managers (Manager) will work to resolve these on a case by case basis in accordance with the Standard Operating Procedure (SOP) Grievances/Issues/Concerns. If the matter is not initially received by the relevant Manager then these should be referred to the relevant Manager in the first instance.

If the Manager is unable to resolve the matter or the complainant is dissatisfied with the outcome/service then the complainant can make a formal complaint per this Policy.

The dispute resolution processes conducted through the Residential Tenancies Authority or QCAT is considered to be an independent process and is not considered as lodging a formal complaint with BHC.

Application

This policy is applicable to all BHC staff, contractors, owners/investors, tenants and applicants for tenancies of BHC, excluding Elevate.

Those residents who are housed through BHC's Retirement Villages program can refer to the relevant Complaints and Feedback Policy available on BHC's website which complies with the Retirement Villages Act 1999 (Qld).

Principles

BHC recognises that errors, misunderstandings, dissatisfaction and unexpected problems occur in all systems and services. Complaints may occur when a complainant feels decisions, behaviour or actions interfere with their rights or are unreasonable and inconsistent with the policies of BHC. In line with BHC's values, BHC encourages a positive approach to Complaints handling and sees it as an opportunity to learn and continuously improve.

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Equally, BHC welcomes positive feedback that compliments staff on the way they deliver a service as it can be used to promote excellence within the organisation.

Each complainant will be addressed in an equitable, objective and unbiased manner through the complaints management process. The principles of objectivity include:

- Openness; to ensure both parties understand the complaints management process.
- Impartiality; to ensure an unbiased balanced consideration of all information/evidence is undertaken before a complaint can be resolved without fear or favor.

This policy is made available on BHC's website.

Policy

What is a complaint?

A complaint is an expression of dissatisfaction with a specific aspect of an interaction or service provided by BHC when the complainant is unhappy with a decision or with the behaviour, standard or type of service provided and requests a review or a changed outcome. This policy covers complaints from external parties to BHC including tenants and family members of tenants. Complaints received through ministerial avenues will be dealt with in line with this Policy.

What is not a complaint?

This policy does not cover the following;

- Complaints about illegal activity – These should be reported to Queensland Police
- Complaints about dog barking or dangerous dogs – These should be reported to the respective local council
- Complaints about violent or threatening behaviour – These should be reported to Queensland Police; or in an emergency 000
- Disputes between tenants or complaints about a tenant's behaviour – These should be reported and will be assessed by the relevant Housing Manager/Property Manager
- Complaints between a BHC tenant and an external contractor not engaged by BHC
- Anti-social behaviour investigations, except where there is a perceived deficiency in the management of anti-social behaviour
- Internal BHC staff issues which are addressed through the Work Related Grievances and Concerns Policy
- Matters that have already been escalated to another forum such as a Court or QCAT
- Concerns about fraud, misconduct or illegal activity are covered by BHC's Whistleblowing Policy

Right of complainants

BHC affirms the right of complainants to make complaints. All complaints will be seriously considered, valued and addressed through a process that is thorough, unbiased, systematic and accessible to all.

BHC may consider providing assistance to make a complaint. This may include arranging an appropriate service provider or interpreter if needed. Where a complainant is unable to

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submit a complaint in writing, BHC supports lodgment to be made by a family member or advocate. Responses to complaints made by a tenant or family member will respect the privacy of tenants.

BHC also affirms that during the process of dealing with a complaint, the complainant will be treated with dignity and afforded all rights, including security of housing for tenants.

Anonymous complaints will be investigated as with any other complaint, though we may be limited in our ability to investigate or advise the complainant of any outcome.

Privacy and Confidentiality

BHC will maintain strict confidentiality about any discussions, matter, content, and process relating to a complaint. BHC complies with the Australian Privacy Principles as outlined in BHC's Privacy Policy.

If an individual or organisation has a complaint about any privacy matters with BHC, the complaint will be dealt with through this Policy.

Complaints process

How to make a complaint?

BHC encourages complainants to first attempt to resolve any issues directly with the relevant BHC staff member, which in most cases will be either the Housing Manager or Property Manager, where possible.

Further specific information relating to tenants can be found in the Complaints Section of the Tenant's Handbook.

If this process does not resolve the issue then a formal complaint can be lodged in writing via any of the following options;

Online Form	Available at www.bhcl.com.au
Post	Attention: Feedback GPO BOX 544 Brisbane QLD 4001
Email	feedback@bhcl.com.au
Telephone	(07) 3307 3000 – member of staff to direct complainant through options for submitting in writing

What happens when a complaint is received?

- BHC logs all complaints to the complaints register
- BHC will acknowledge the complaint within 3 business days of receipt.
- Acknowledgement will include an advised date of response. This timeframe should be no longer than 30 days, unless the person reviewing the matter is unable to speak to the parties involved. In this case, BHC will contact the complainant and advise of any delays.
- An investigation will be conducted by the appropriate manager

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- Complainants will be notified in writing of the outcome of their formal complaint by BHC and reasons for decisions relating to them where appropriate
- Responses will include details of what to do next if the complainant is unhappy with the outcome and any rights to review a determination (if applicable).

Review of a Complaint

If a complainant is dissatisfied with the decision, a review may be requested. A review of a complaint will be undertaken by someone who was not the original decision maker and is a senior member of staff.

Reporting of Complaints

BHC will regularly review information from complaints and reviews to identify ways in which its services and their delivery can be improved. It will regularly report to its Board on the numbers and types of complaints and reviews and on their outcomes.

It will also provide information on its complaints and appeals to comply with the reporting requirements of the National Regulatory System for Community Housing (NRSCH).

External Complaints

At any time a complainant can utilise an external Complaints process, e.g. RTA conciliation.

Additionally, if a complainant is still unhappy with the outcome once a review has been completed by BHC under this process there are a number of external avenues that can be followed.

External avenues are listed below;

- National Regulatory System for Community Housing (NRSCH)
- Queensland Ombudsman
- Residential Tenancies Authority (RTA)
- Queensland Civil and Administrative Tribunal (QCAT)
- The NDIS Commission will manage complaints about NDIS supports and services. For further information and a list of Disability Support Advocate's refer to www.ndiscommission.gov.au or call them on 1800 035 544.

If external complaints are pursued BHC will, to the extent possible, work to resolve issues through these avenues.

Unreasonable conduct by a complainant

The majority of people who are dissatisfied with a service or an outcome interact with BHC reasonably and responsibly, even when they are experiencing high levels of distress, frustration or anger about their complaint. However, should any complainant behave unreasonably or in an abusive, aggressive or threatening manner, a staff member may escalate the matter to a manager for further support.

BHC may respond to unreasonable conduct by limiting or adapting the ways that we interact with and/or deliver services to such a complainant by restricting:

- **Who they have contact with** – e.g. limiting a complainant to a sole contact person within BHC

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- **When they may have contact** – e.g. limiting a complainant's contact with BHC staff to a particular time, day, or length of time, or curbing the frequency of their contact
- **How they may make contact** – e.g. limiting or modifying the form of contact that the complainant has with BHC. This can include modifying or limiting telephone and written communications, prohibiting access to BHC offices, or stipulating contact through a support representative only.

What is a compliment?

In line with our value of celebrating success, BHC values its staff and believes that compliments are an important mechanism to identify where we have performed well or delivered successful programs and events.

Compliments Process

BHC welcomes positive feedback and compliments and will follow the below process to ensure the member of staff identified receives the appropriate recognition;

- All Compliments will be registered in the Compliments Register
- Compliments will be acknowledged in writing
- Compliments will be forwarded to the relevant member of staff and their manager for appropriate recognition and noting in their personnel file

Review

The Complaints Policy and its related documents are reviewed periodically.

Related Documents, Policies & Procedures

- SOP Grievances/Issues/Concerns
- Retirement Villages Complaints & Feedback Policy
- Specialist Disability Accommodation Policy
- National Rental Affordability Scheme Amendment (Investor Protection) Regulations 2019
- Privacy Policy
- Whistleblowing Policy
- Work Related Grievances & Concerns Policy
- Anti-Social Behaviour Policy (in development)
- NDIS Incident Management System
- Tenant Handbook

DOCUMENT CHANGE HISTORY

Version Number	Approved by	Date	Description of Change
1.0	Board	Nov 2007	New Policy
2.0	Board	May 2012	Updated
3.0	Board	April 2016	Updated
4.0	Board	September 2020	Extended definition to include applicants. Inclusion of additional external parties including, Owners/Investors and Family/carers.

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