

COMPLAINTS AND FEEDBACK POLICY

Policy category	Tenant & Housing Services	Group Application	BHC
Drafted by	Operations Manager	Version	V5.0
Delegated updates	COO	Last approved	September 2023
Responsible person	CEO	Scheduled review date	September 2026

Purpose

The purpose of this policy is to ensure Brisbane Housing Company Limited and each of its related entities (each **BHC**) has a consistent, systematic approach to managing and monitoring complaints and feedback on its services and decisions.

Application

This policy is applicable to:

- All workers and directors of BHC;
- All BHC applicants and tenants/residents (and their representatives, i.e. family members, carers or advocates);
- All owners/investors of properties managed by BHC;
- All suppliers, independent contractors, associates and partners (**relevant stakeholders**);
- Visitors and members of the general public; and
- All tenancies across the BHC portfolio.

For clarity, this policy does not apply to properties managed under the *Retirement Villages Act 1999* or Elevate¹.

Principles

BHC encourages a positive approach to complaints handling and feedback and sees it as an opportunity for learning and continuous improvement.

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.

BHC will maintain a Complaints and Feedback Management System that is tenant-focused and provides for continual review and monitoring.

All complaints will be addressed in a prompt, equitable and objective manner based on the principles of cooperation, respect, accessibility, open disclosure (where appropriate) and impartiality.

BHC will act and make decisions in a way that is compatible with human rights.

Roles and Responsibilities

Role	Responsibility
Directors and Chief Executive Officer (CEO)	<p>The directors and CEO have an obligation to:</p> <ul style="list-style-type: none"> • Ensure BHC's complaints and feedback management processes are fair, consistent, accessible and transparent; and • Monitor the implementation, outcomes and review of this policy.

¹ The business conducted by Catalyst Affordable Housing Limited under the name Elevate.

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Role	Responsibility
Chief Operations Officer (COO)	<p>The COO has an obligation to:</p> <ul style="list-style-type: none"> • Ensure BHC's complaints and feedback management processes are fair, consistent, accessible and transparent; • Provide support and guidance to Senior Managers in relation to managing complaints and feedback; • Receive and manage complaints that have been escalated or appealed in accordance with this policy (including any complaints in relation to senior staff); • Assign adequate resources to the maintenance and custodianship of the Complaints and Feedback Management System; • Oversee the collection and analysis of complaints and feedback data and identify opportunities for service improvements; • Provide regular reports to the Tenancy Management Committee on issues arising from complaints; and • Monitor the implementation, outcomes and review of this policy.
Senior Managers	<p>Senior Managers have an obligation to:</p> <ul style="list-style-type: none"> • Administer the policy and provide direction and clarification on its interpretation and application; • Manage and monitor the complaints and feedback process (as relevant to their area of responsibility); • Receive and manage complaints that have been escalated or appealed in accordance with this policy (including any complaints in relation to staff and contractor caretakers); • Where appropriate, bring complaints and feedback to the attention of and seek advice from the COO in a timely manner; • Ensure that their respective teams have access to and are familiar with the requirements of this policy; and • Provide training, support and timely advice to staff who are managing complaints and feedback.
Responsible Officers	<p>Responsible Officers have an obligation to:</p> <ul style="list-style-type: none"> • Assist complainants with their queries, requests or concerns (wherever possible); • Receive and manage complaints and feedback in accordance with this policy; and • Ensure complaints and feedback are appropriately recorded in the BHC Tenancy Database and/or relevant register.
Directors and Staff	<p>All directors and staff have a duty to:</p> <ul style="list-style-type: none"> • Promote a culture that values complaints and feedback and is committed to effective resolution and continuous improvement; • Make decisions and take actions that are fair, transparent and compatible with human rights; and • Ensure all relevant regulatory, safety and contractual requirements are met.

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Definitions

In this policy, the following words have the following meanings:

A **complaint** is an expression of dissatisfaction made to or about BHC (from individuals accessing its services or others who interact with BHC) about a specific aspect of its services or operations, an interaction, a decision or handling of a complaint where a response is sought, reasonably expected or legally required.

A **compliment** is an expression of praise, encouragement or gratitude about an interaction, service or decision.

Contractor Caretaker means all persons who carry out caretaker activities for one or more BHC properties on behalf of BHC. It does not include an employee of BHC or consultants, other service providers, suppliers or labour hire workers.

Feedback may consist of any positive or negative opinion, comment/suggestion or expression of interest/concern made directly or indirectly by an individual where a response is not explicitly or implicitly expected or legally required.

Responsible Officer means the main individual responsible for managing and responding to a complaint or feedback.

Staff member or **Staff** means an employee or a volunteer of BHC.

Unreasonable Complainant Conduct is any conduct by a current or former complainant which because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to the complaint. For the purposes of this policy, unreasonable conduct includes (but is not limited to) the following:

- Threatening harm or violence towards workers or third parties;
- Engaging in aggressive or verbally abusive conduct towards workers, including making derogatory, racist or demeaning remarks or sending threatening correspondence;
- Persistently calling, writing to and/or emailing BHC and/or making complaints about matters that have already been dealt with by BHC; and
- Making unwarranted demands to have matters dealt with in a particular way.

Worker means an employee, a volunteer, a labour hire worker or a contractor caretaker of BHC.

Policy

BHC recognises that errors, misunderstandings, dissatisfaction and unexpected problems occur in all systems and services. Complaints may occur when a complainant feels BHC's decisions, behaviours or actions interfere with their rights or are unreasonable and inconsistent with the policies of BHC.

As part of normal operations, it is expected that the Responsible Officer will work to resolve these on a case-by-case basis in accordance with the Standard Operating Procedure (**SOP**) Grievances/Issues/Concerns. Note: tenant/resident complaints will generally be managed by the relevant Housing Manager or Property Manager.

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This policy is made available on the BHC website at www.bhcl.com.au/contact-us/feedback/.

1. Complaints Covered by this Policy

Types of complaints covered by this policy include:

- Service issues such as accessibility and quality of services;
- Competence or conduct of BHC workers and relevant stakeholders (including allegations of suspected fraud, misconduct or illegal activity). Note: if an individual fears reporting the matter may result in repercussions, they may use the confidential or whistleblowing* reporting channels (refer to the BHC Whistleblower Policy). **This channel is only open to eligible disclosers;*
- BHC actions or decisions that directly impact a tenant/resident's experience or where a tenant/resident feels they have not been properly explained;
- Privacy and confidentiality matters;
- Inaction or unexplained delays in responding to requests or providing services; and
- Disagreement with or inconsistent application of BHC policy or procedure.

2. Complaints not Covered by this Policy

This policy does not cover the following:

- Complaints about suspected illegal or criminal activity – these should be reported to the Queensland Police Service (**QPS**) except for allegations involving BHC workers, relevant stakeholders or tenants/residents who may be engaging in illegal or criminal activity within a BHC premises, which should be reported to both QPS and BHC;
- 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 QPS (phone 000 if an emergency);
- Disputes between tenants/residents;
- Complaints between a tenant/resident and an external contractor not engaged by BHC;
- Anti-social behaviour investigations, except where there is a perceived deficiency in BHC's management of the anti-social behaviour;
- Internal staff or management issues which are addressed through the BHC Work Related Grievances and Concerns Policy; and
- Matters that have already been escalated to another forum such as a Court or the Queensland Civil and Administrative Tribunal (**QCAT**).

3. 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, fair and accessible to all.

BHC may consider providing assistance to enable complainants to make a complaint. This may include arranging an appropriate service provider or interpreter if needed. Where a complainant is unable to submit a complaint in writing, BHC supports lodgement to be made by a representative.

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4. Anonymous Complaints

Anonymous complaints will be accepted and investigated where there is enough information provided. Please note: insufficient information may limit BHC's ability to investigate or advise the complainant of an outcome.

5. 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 and Confidentiality Policy.

Information relating to complaints is securely stored and only accessible by those staff members whose duties require them to deal with the information (refer to BHC Privacy and Information Management Procedure).

6. Complaints Process

How to make a complaint

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

Further specific information relating to tenants/residents can be found in the Complaints Section of the Tenant 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 formal complaint is received?

- BHC logs all formal complaints in the Complaints and Compliments Register.
- BHC will acknowledge the complaint within three (3) business days of receipt.
- Acknowledgement will include an advised date of response. Complaints will be resolved as quickly as possible. BHC's target timeframe for resolution is 15 business days, but in most cases will take less time than this. For complex cases, additional time may be required and the complainant will be informed of the expected timeframe for resolution and any reasons for the delay.
- An investigation will be conducted by an appropriate manager. To maintain impartiality and fairness, BHC will ensure the manager appointed to investigate the complaint is not the subject of the complaint.
- Complainants will be notified in writing of the outcome of their formal complaint by BHC and

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reasons for decisions relating to them where appropriate.

- Responses will include details of what to do next if the complainant is dissatisfied 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.

If a complainant is dissatisfied with the review outcome, the matter can be pursued externally (refer below).

External Complaints

At any time, a complainant can utilise an external complaints process, e.g. Residential Tenancies Authority (**RTA**) conciliation.

Additionally, if a complainant is still dissatisfied with the outcome once BHC has completed a review, they may initiate an external review or seek independent mediation through one or more of the channels outlined below:

- National Regulatory System for Community Housing (**NRSCH**);
- Queensland Ombudsman;
- QCAT; and/or
- The NDIS² Commission (complaints about NDIS supports and services). For further information and a list of Disability Support Advocates 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 any 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, the matter will be escalated to a Manager or Senior Manager for further support.

BHC may respond to **unreasonable complainant conduct** by limiting or adapting the ways it interacts 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;
- **What they can discuss** – e.g. applying boundaries to what can and can't be discussed with BHC staff;
- **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; and/or
- **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.

² National Disability Insurance Scheme.

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Note: all complaints are to be considered on their merits. Unreasonable complainant conduct does not mean that the issues raised will be invalid or lacking substance.

Compliments Process

BHC welcomes positive feedback and compliments and will follow the below process to ensure the recipient identified receives the appropriate recognition:

- All compliments will be registered in the Complaints and Compliments Register;
- Compliments will be acknowledged in writing; and
- Compliments will be forwarded to the recipient and their supervising manager for appropriate recognition.

Feedback Process

Not all feedback requires a response. Any feedback that requires investigation and a response will be recorded in the BHC Tenancy Database and/or Continuous Improvement Register. Feedback will be considered and used to inform BHC's continuous improvement process.

Continuous Improvement

Some complaints and feedback may result in required change to practices and policies. When this occurs, the Responsible Officer will initiate the proposed change(s) in consultation with the COO and other relevant 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 through the delegated Tenancy Management Committee on the numbers, types and outcomes of complaints and reviews.

BHC will also provide information on its complaints and appeals to the Queensland Registrar to comply with the NRSCH reporting requirements.

Review

The Complaints and Feedback Policy and its related documents are reviewed periodically.

Related Documents

- Anti-Discrimination Policy
- Child and Young Person Protection Policy
- Code of Conduct
- Complaints and Compliments Register
- Continuous Improvement Register
- Housing Manager Procedures Manual
- *National Disability Insurance Scheme Act 2013* (Cth)
- Privacy and Confidentiality Policy
- Privacy and Information Management Procedure
- *Residential Tenancies and Rooming Accommodation Act 2008* (Qld)
- SDA Incident Management Policy
- SOP Grievances/Issues/Concerns
- Specialist Disability Accommodation Policy
- Tenant Handbook
- Whistleblowing Policy

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DOCUMENT CHANGE HISTORY

Version Number	Approved by	Date	Description of Change
1.0	Board	November 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.
5.0	CEO	September 2023	Significant update. Added roles and responsibilities, expanded definitions and principles and clarified policy coverage.