

Complaints, Feedback & Appeals

Policy

1 Purpose

At Southern Cross Housing Ltd. individuals have the right to expect quality service delivery. If we fail to meet the expectations of our tenants and the wider community, they, along with their representatives, have the right to provide and have their feedback, complaint, suggestion, or appeal handled in a prompt, effective, respectful, and courteous manner.

2 Scope

This policy applies to all staff, tenants, contractors, and volunteers working in or for Southern Cross Housing Ltd.

3 Policy Statement

Feedback in the form of complaints, suggestions, or compliments provide us with an opportunity to examine how we can improve the quality, safety, and efficiency of our service delivery. SCH encourages and supports the community we care for and our workforce to report complaints and feedback.

SCH will be fair, transparent, and responsive in handling of complaints, feedback and appeals.

Complaints

All Complaints and Feedback should be recorded in the Complaints, Feedback and Appeals register within SCH, and be managed promptly by the relevant Housing Officer.

Complaints must be received in writing, where possible, for SCH to action and follow up on them.

Where the complaint cannot be resolved by, or is about, the Housing Officer, the complaint should be escalated to the Housing Team Leader. Where the complaint cannot be resolved by, or is about, the Housing Team Leader, the complaint should be escalated to the Chief Property Officer to manage.

Where the issue is highly sensitive or High Risk, it is acceptable to receive the complaint verbally and/or second hand to begin an investigation. Where a complaint of this nature is received verbally it is important to record it immediately in writing so that the details are accurate and fresh. Highly sensitive and high-risk complaints must be escalated immediately to the Chief Property Officer.

It is the responsibility of all staff to help resolve issues as quickly and effectively as possible. It is important when managing a complaint to ensure that everyone is working within SCH and SCCWA policies and procedures, as well as following relevant legislative requirements.

Complaints should be acknowledged on receipt, or within 3 days. Where an investigation into a complaint is required, this should be completed within 21 days and a written response to the complaint provided as soon as it is resolved, or at the end of the 21 days. If the investigation is prolonged, written notification of the delay in a resolution should be provided to the complainant.

The Community Housing Registrar has the power to investigate complaints regarding the compliance of SCH with legislation and around registration requirements. There is mandatory notification of complaints and incidents to the registrar that directly relate to systematic or serious business failures, non-compliance with legal obligations, fraud, corruption, criminal conduct, misallocation of government funding, systemic maintenance issues with asset management, tenancy issues that indicate systemic failure to deliver fair, transparent, and responsive housing, issues which can cause reputational damage. Complaints of this nature should be reported immediately to the Chief Property Officer so that they can report it to the Registrar, as required.

Feedback

Feedback is always welcome and encouraged from tenants, their family, support networks and friends, and the wider community in which we operate.

Feedback is welcome in writing, over the phone or in person. Feedback should then be recorded in the complaints, feedback and appeals register, and brought to the regular team meeting for discussion about whether it needs to be included in our continuous improvement register.

Any constructive complaints or feedback relating to current policies and procedures should be added to the SCH continuous improvement register to be reviewed in greater detail, to ensure that there is sufficient scrutiny of the issue and practical, positive revision during the review process of the affected policies and procedures.

As SCH is a subsidiary of SCCWA, SCH is to manage feedback in line with SCCWA's guiding principles of complaints management being:

1. quality and continuous improvement
2. open disclosure
3. commitment
4. accessibility
5. responsiveness
6. transparency and accountability
7. privacy and confidentiality, and
8. objectivity and procedural fairness

Appeals

Appeals refers to a request from a tenant to review a decision made by the Housing Officer, or Team Leader, Housing directly in relation to a decision made about a tenant's property, tenancy, breach, or termination. All appeals should be logged in the Complaints, Feedback and Appeals Register and escalated to the relevant team member as soon as is practicable.

All appeals should be reviewed and acknowledged within 3 business days of receiving the appeal.

If a decision has been made by a team member, a different team member should handle the initial appeal assessment to ensure that the case is reviewed by a fresh perspective, free of preconceived opinions and biases.

For full transparency, all appeals of serious and sensitive nature, or appeals about persistent and challenging behaviours should be reviewed and discussed between Housing Team Leader and the Chief Property Officer to ensure equity, fairness, and due consideration of the appeal process. Where the appeal is around a decision made regarding the conduct of the Housing Team Leader, the review and outcome of the appeal will sit solely with the Chief Property Officer.

Before communicating an outcome to the appellant, staff should receive confirmation of the outcome in writing from Housing Team Leader or the Chief Property Officer.

Outcomes of the appeal should be issued in writing to the appellant within 10 business days of receiving the appeal request.

4 Roles and Responsibilities

Everyone at SCH has a role to play in the provision of quality property management, inclusive of the management of feedback. Safety and quality roles and responsibilities are outlined in employee position descriptions – management of consumer feedback. It is the role of all staff to support their colleagues to focus on the needs of the individual and work together to facilitate the timely closure of feedback. This is achieved by the positive actions of staff, supported by effective feedback management systems.

SCCWA has the following clearly defined roles and responsibilities for the governance and management of feedback. A comprehensive list of roles and responsibilities relating to quality and clinical governance is articulated in the Quality and Clinical Governance Policy. Staff are required to comply with SCCWA's Code of Conduct Policy in addition to legislative requirements listed.

Role	Responsible for:
Executive Management Committee	Endorse and ensures compliance with this policy Be familiar with legislative requirements of this policy

Role	Responsible for:
General Manager/Executive managers/Head of Department	<p>Oversee compliance with this policy</p> <p>Support staff competence and compliance with this policy and ensures staff receive appropriate training and supervision to comply with this policy</p> <p>Report on collated information regarding policy scope and key performance indicators, to ensure operational decision making is informed by outcomes and this policy</p> <ul style="list-style-type: none"> Support the review of this policy
Manager, Co-ordinators/Team Leaders	<p>Manage and monitor compliance with this policy and facilitate access for staff to receive appropriate training, and supervision to comply with this policy</p> <p>Collate and escalate reported information as required</p> <p>Ensure operational decision making is informed by this policy</p>
Staff	<p>Comply with this policy</p> <p>Maintain knowledge of the current practices in relation to the subject of this policy, as applicable to their role</p> <p>Report any incidents as per organisational policy</p> <ul style="list-style-type: none"> Participate in regular practice supervision

5 Legislation and Supporting Documents

5.1 Legislation and Standards

- Privacy Act 1988 (Cth)
- National Privacy Principles
- Residential Tenancies Act 1987 (WA)

5.2 Related SCCWA Policy and Procedures

- Southern Cross Care mission, values and service charter
- SCCWA Complaints and Feedback Policy

5.3 Related SCCWA Forms and Tools

- SCH Tenant Complaint Form
- SCH Continuous Improvement/Tenant Suggestion Form

5.4 Other related documents and links

- Renting Out Your Property – A Lessors Guide
- Community Housing Regulatory Framework
- www.nrsch.gov.au/tenants/making-a-complaint

6 Definitions

Term	Meaning for the purposes of this policy document
Appeal:	Is a request to review or reverse a decision made by SCH staff that directly affects a tenant, their property or tenancy.
Complaint:	Is an expression or statement of dissatisfaction made by, or on behalf of, an individual we house, their support person, carer or visitor, or a member of our community regarding any aspect of a service provided by SCH. A complaint may be written or verbal. Complaints can be grouped into the following three categories (1) informal complaints; (2) formal complaints that require investigation; and (3) external or unresolved complaints.
Complainant:	Is a person who makes a complaint or expression of concern regarding any aspect of a service provided by SCH. This can include tenants, relatives, clients, friends, carers, visitors, representatives, advocates, suppliers, and health professionals external to SCH.
Compliment:	Is an expression or statement of satisfaction made by or on behalf of an individual we house, their support person, carer or visitor, or a member of our community regarding any aspect of a service provided by SCCWA. A compliment may be written or verbal.
Feedback:	Written or verbal compliments, complaints, enquiries, and suggestions.
Feedback system:	Are the systems used across SCH and SCCWA for recording feedback: CarePage, Complaints Register, etc
High risk complaint:	A complaint that meets one or more of the below criteria: <ul style="list-style-type: none"> • complaints relating to a critical or serious incident • complainants who have engaged legal representation • complaints relating to a criminal act or serious misconduct • complaints relating to a breach of professional standards • complaints that threaten the physical safety or security of other tenants or the organisation or its employees • complaints that relate to the safety of children or vulnerable adults • complaints that pose a reputational or media threat to the organisation • complaints received from external agencies
Suggestion:	A recommendation to improve any aspect of a service.
Outcome:	The result of the complaint investigation and resolution may include a comment of; resolved, change in policy or procedure, referred to an external agency, lapsed or withdrawn or not upheld.

7 Document Control

Rev	Owner	Sections Modified	Date Reviewed	Next Review Date
1.0	Southern Cross Housing	First Draft	11/01/2024	31/01/2025
2.0	Southern Cross Housing	Review Only	23/01/2025	23/01.2028