

## 1.0 Client / Tenant Complaints and Appeals Policy

### 2.0 Identification Grid

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<b>Policy Owner:</b> GM People, Planning, Performance and Technology	<b>Portfolio:</b> Client Services & Housing
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### 3.0 Purpose

The purpose of this policy is to ensure that all Launch Housing clients and prospective clients are aware of their right to make a complaint about Launch Housing's delivery of housing and/or support services, and to appeal any decisions made. Launch Housing will meet its responsibility to address all complaints transparently, fully, fairly, and within a reasonable time frame, as set out in its contractual arrangements with government agencies and programs.

### 4.0 Definitions

<b>Advocate</b>	A person who may assist the client/tenant making a complaint against Launch Housing. The advocate can be a friend, independent person, Launch Housing employee or person from an external advocacy service.
<b>Complaint</b>	A registered expression of dissatisfaction by a current or previous recipient of Launch Housing's services: <ul style="list-style-type: none"> <li>• lodged by a complainant or a complainant's representative;</li> <li>• made verbally, in writing, by social media or anonymously;</li> <li>• related to a specific risk, episode, occurrence or failure in the provision of a service that has resulted in an impact on an individual.</li> </ul> A complaint may be made about any worker, volunteer or student at Launch Housing.
<b>Complainant</b>	Client / Tenant or prospective tenant making the complaint.
<b>Complaint Register</b>	A document that contains the details of all complaints raised including those made anonymously. Managers will lodge details on the Register when they receive a new complaint and will update the entry when the matter is resolved/closed.  The Client/Tenant Complaint Register will be accessed six-monthly to review compliance.
<b>Complaint Resolved</b>	A complaint is resolved when the complainant signs the relevant section of the Complaints Action & Resolution form or as agreed and

	recorded in another communication record. Or, the complaints is deemed resolved to the fullest extent by the GM Keeping Housing.
<b>CEO or nominee</b>	Oversee complaints that relate to other legislative requirements such as Child Safe and Reportable Conduct.
<b>Staff member concerned</b>	The staff member about whom the complaint has been made.
<b>Receiving staff member</b>	The staff member who receives the complaint from the client/tenant or their representative. This person responds as described in Section 6: Responsibilities.
<b>The investigating line manager/s</b>	These staff members are the line managers responsible for investigating the complaint. They may delegate or co-opt other staff members as appropriate.
<b>VHR</b>	The Victorian Housing Registrar, the state-wide common application for people seeking public and social housing.
<b>DHHS</b>	The Victorian Department of Health and Human Services.
<b>Appeal</b>	When a person asks for a review of a decision of Launch Housing to which this policy applies.

## 5.0 Policy Details

### 5.1 Scope

This policy does not apply to:

- Complaints or grievances by employees or contractors of Launch Housing; or
- To disputes between clients/tenants of Launch Housing;
- Complaints which must by law be referred to the police or a government agency.

### 5.2 Policy Principles

Launch Housing's complaints and appeals policy is guided by the following principles:

#### 5.2.1 Accessibility

- i. Launch Housing clients/tenants are encouraged to raise concerns or complaints at any time, about Launch Housing decision-making or service delivery, that directly affects them.
- ii. Information about the complaints process is visible and accessible, and well promoted in display areas within Launch Housing premises and facilities.
- iii. The information will be provided in plain English and a number of community languages, and a range of formats to meet different communication needs. The material will include the following information:
  - a. how to make a complaint information sheet;
  - b. the complaints and appeals process;
  - c. the right of the client/tenant to an advocate, and
  - d. options to make complaints using external agencies.
- iv. In the case of a complaint the receiving staff member will ensure the client/tenant has this information or provide it to them.

### 5.2.2 **Advocacy**

At any stage in the complaint process, a complainant may choose to have advocacy support and/or take up external assistance.

### 5.2.3 **Responsiveness**

Complaints are considered to be a source of constructive feedback and are consistently and systematically recorded in Launch Housing's *Client/Tenant Complaint Register* in order to ensure that the complaint process is responsive to client/tenant needs.

### 5.2.4 **Fairness and Natural Justice**

- i. Launch Housing will operate according to the rules of natural justice, which require that an allegation against someone be put explicitly to that person, and they be provided the opportunity to respond to that allegation. This is subject to the provisions contained in the *Duty of Care Policy*.
- ii. Complainants will be assisted with their communication needs, including the provision of an interpreter, so that they can participate effectively in the resolution process.

### 5.2.5 **Confidentiality**

The regulatory standards of privacy and confidentiality apply. Clients/tenants are informed about confidentiality as it relates to a complaint in the written information they receive.

### 5.2.6 **No disadvantage**

No clients/tenants involved in the complaint will be disadvantaged or face discrimination from Launch Housing, either at the time of making a complaint or subsequently.

### 5.2.7 **Courtesy and respect**

All meetings conducted to respond to the complaint will be characterized by courtesy and respect for all parties.

### 5.2.8 **Timeliness of response**

- i. Launch Housing will respond to complaints in a timely manner from initial contact, through the resolution process to outcomes, with all complaints being investigated and finalised within 30 days where this is possible.
- ii. An individual who is a tenant or prospective tenant of Launch Housing and who has made a complaint to Launch Housing may refer the complaint to the Housing Register for investigation if the complaint is not resolved within 30 days after it is made.
- iii. Launch Housing will acknowledge receipt of a complaint by a client/tenant, prospective tenant or advocate within 3 working days by providing them with a copy of their completed Complaint Registration Form.
- iv. Launch Housing will monitor the effectiveness of the complaint handling procedures and where appropriate, make changes so they best meet the needs of clients and tenants.

### 5.2.9 **Victorian Housing Register**

Launch Housing participates in the VHR by:

- Providing applicants with information regarding social housing applications 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 delivery of a Launch Housing service that has been provided to them in making an application for social housing; or
- appeal a decision made by Launch Housing 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;
  - determine if an offer of social housing is a reasonable offer.

All complaint requests will be reviewed by Launch Housing under the complaints and appeals procedure.

If applicants are dissatisfied with the resolution of a complaint under the complaints and appeals procedure, they may refer the complaint to the DHHS Housing Appeals Office.

## 6.0 Responsibilities

<b>CEO</b> <b>Board Members</b>	<ul style="list-style-type: none"> <li>• May be involved in the resolution of any complaint.</li> <li>• May receive and pass on to the Executive, any complaints.</li> </ul>
<b>General Managers</b>	<ul style="list-style-type: none"> <li>• Forwarding complaints received by the CEO or Board Members to the manager of staff member concerned or other appropriate person.</li> </ul>
<b>Line Managers</b>	<ul style="list-style-type: none"> <li>• Record complaint and resolution/completion in <i>Complaint Register</i>.</li> <li>• Record details of the complaint and process in the client/tenant’s file.</li> <li>• Advise the staff member concerned of the receipt of the complaint.</li> <li>• Respond to the complaint following the established process.</li> <li>• Follow and complete the <i>Client/Tenant Complaint Action and Resolution Form</i>.</li> <li>• Support team members.</li> <li>• Resolve complaint where possible and record this in the <i>Client/Tenant Complaint Action and Resolution Form</i> and <i>Complaint Register</i>.</li> <li>• Escalate a complaint where resolution is not possible.</li> <li>• Delegate action as deemed appropriate.</li> <li>• Periodically review complaints for quality improvement purposes.</li> </ul>
<b>All staff</b>	<ul style="list-style-type: none"> <li>• Listen to and validate complaints raised by clients/tenants.</li> <li>• Provide clients/tenants with information about the complaints process.</li> </ul>

	<ul style="list-style-type: none"> <li>• Provide clients/tenants with information about their right to advocacy and external complaint options.</li> <li>• Assist clients to make their complaint by: <ul style="list-style-type: none"> <li>○ helping them to provide a written complaint;</li> <li>○ recording the details if they are making a verbal complaint;</li> <li>○ helping complete the <i>Client/Tenant Complaint Registration Form</i>;</li> </ul> </li> <li>• Pass the complaint on to the manager of the staff member concerned, in a timely way.</li> </ul>
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## 7.0 Relevant Legislation & External Documents

- Privacy Act 1988 (Commonwealth)
- Privacy and Data Protection Act 2014 (Vic)
- Charter of Human Rights and Responsibilities Act 2006 (Vic)
- DHHS Service Standards for Registered Agencies
- Housing Act 1983 (Vic)
- Victorian Housing Registrar Performance Standards for Registered Agencies
- DHHS Victorian Housing Register Policies and Operational Guidelines
- Privacy Act 1988 (Commonwealth)
- Privacy and Data Protection Act 2014 (Vic)

## 8.0 Supporting Documents and Implementation Tools

- LH Privacy Policy
- LH Duty of Care Policy
- LH Client / Tenant Complaints and Appeals Procedure
- LH Client / Tenant Complaints and Appeals Information Sheet
- LH Client / Tenant Complaint Registration Form
- LH Client / Tenant Complaint Action & Resolution Form
- LH Working Together Brochure