



COMMUNITY HOUSING
Industry Association Victoria

A guide to managing and responding to complaints for
Community Housing Organisations

Complaints Practice Guidance



OFFICIAL

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1. The Purpose of the Guidance

Complaint management is a critical part of community housing, ensuring renters have access to a fair, accessible and transparent process for raising concerns, while supporting accountability, continuous improvement and positive outcomes for renters.

This guide draws from the Australian and New Zealand Standard Guidelines for Complaint Management in Organisations (AS/NZS10002:2014) and aims to help community housing organisations (CHOs) to review and improve practice.

This guidance is intended to be used to by CHOs in managing complaints from renters, applicants or other people in relation to their housing services. It does not apply to staff grievances with their employer or whistle-blowers.



2. Principles

Good practice complaint management is underpinned by a set of principles which guide each organisation's approach. The following principles have been developed to guide the recommendations included in this framework, and to highlight key issues for organisations to consider in developing or reviewing their approach. CHOs differ in the scale and complexity and have varying external reporting requirements. The following principles of good practice complaint management apply to all organisations, and should be implemented through different systems, policies and procedures.

- **Complaints provide an opportunity for continuous organisational improvement.**
Organisations should treat complaints as a strategic opportunity for organisational learning and continuous improvement. Complaints, and particularly trends in complaints, may indicate wider concerns or issues in an organisation's policy and practice. Welcoming complaints provides an opportunity to identify and resolve issues as they arise, and to prevent future complaints by changing organisational practice.
- **People have a right to complain.**
A good complaint management approach is focused on people. Organisations should recognise that people have a right to complain, and to have their complaint addressed appropriately. The policy and procedure should ensure that complainants are treated with fairness and respect, as should the organisation's culture.
- **A good complaints policy focuses on resolution.**
An organisation's policy, procedures and practice should drive a genuine attempt to resolve the issue where possible, rather than simply providing a response.
- **All complaints are treated promptly and fairly.**
A complaint policy should include target timeframes for responding to and resolving complaints. The organisation should consider any actual or perceived conflicts of interest in the matter by any staff member involved in managing a complaint. All sides involved in a complaint should be listened to and their viewpoint taken into account. Where a complaint is about a specific person, they should be given opportunity to respond.
- **The procedure provides opportunities for escalation and review.**
A good complaint management framework provides opportunities for escalation of a complaint. This should include a process for internal escalation of a complaint, as well as linking complainants to external review mechanisms, advocacy and support services where they are available.
- **Key stakeholders are consulted in developing the approach.**
Developing a meaningful, appropriate and effective approach to complaint management relies on the involvement of key stakeholders in the process. Key stakeholders can include operational and management staff, renters, applicants, neighbours, partner agencies, contractors and others.
- **Information and processes are visible and accessible.**
An organisation's policy and procedures for managing complaints should be open, visible and readily available to complainants and potential complainants. Information and processes should be accessible to all, with implications for methods and means of communication, availability of forms, assistance and support options, and promotion of complaints processes. Accessibility is particularly important for complainants who might face significant barriers to making a complaint, such as cultural, language, literacy or disability-related barriers.



- **Roles and responsibilities are clearly defined.**

Organisations need to clearly define roles and responsibilities for managing complaints. It is also important to ensure responsibility for complaint management is adequately resourced to allow complaints to be addressed in a responsive and timely manner.

- **Staff members are properly trained to identify, diagnose and handle complaints.**

Complaint management training should be provided for all relevant staff, including training tailored to the specific responsibilities held for managing and/or reporting on complaints. Using case studies in training can be helpful.

- **Clear communication is maintained throughout the process.**

Organisations should keep complainants informed of the status of their complaint and should clearly communicate the results of the complaint. Clearly specified timeframes should be communicated to complainants. Early communication can also be used to set realistic expectations around what the organisation can and cannot influence.



3. Defining key terms

When discussing policies, procedures and practice related to the handling of feedback, complaints and appeals in community housing, it is useful to distinguish between key terms, to ensure a shared understanding on what constitutes as a 'service request', 'feedback', a 'complaint', an 'appeal', and a 'neighbourhood dispute'.

General enquiries and service requests

A general enquiry or service request is a request for information or a service, for example, a maintenance request or an enquiry on the timeline for completing that request.

Feedback

Feedback refers to opinions or comments, positive or negative, given to an organisation about its services. Feedback may be useful to inform policy or process improvements but will not always require a response.

Complaints

A complaint is an expression of dissatisfaction with a housing service which requires resolution or response. The Standard (AS/NZS10002:2014) defines complaints as "expressions of dissatisfaction made to or about an organisation related to its products, services, staff, or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required."

Appeals

An appeal is a request for a review of a decision. This could include, amongst other things, a decision relating to eligibility, offers, rent assessments, transfers or maintenance charges. It can also include a decision related to the outcome of a complaint.

Management of an appeal requires a person conducting the review to put themselves in the position of the original decision maker and consider all the relevant circumstances alongside any new information provided. The person conducting the review will then decide whether the original decision should stand, whether an alternative decision should be made, and if there are any other options to reach a suitable outcome.

Neighbourhood disputes

Neighbourhood disputes are conflicts that arise between household members of homes in close proximity due to behaviour that is disruptive, causes a nuisance or impacts the quiet enjoyment of renters. Such behaviour can include but is not limited to; noise disturbances; incursion onto private property; abusive language; and inappropriate use of common areas.

A neighbourhood dispute is not in itself a complaint, but it may become one if one party is dissatisfied with how the matter has been handled by the agency. Agencies should have a process in place to identify when this transition occurs and ensure the matter is managed in accordance with agency complaint handling procedures.

Examples

Illustrative examples for key terms	
General enquiry	A renter queries what the expected timeframe will be for attending to requested maintenance.
Service request	A renter requests that a damaged wall be repaired.
Feedback	A renter advises that they are pleased with the expected timeline.
Complaint	A renter advises that a maintenance person attended their home but was rude and did not adequately rectify the issue.



Appeal	A renter is unhappy with the response to their complaint and asks for the decision to be reviewed.
Neighbourhood dispute	Conflict arises due to the noise from one renter's home causing a disturbance to a renter in a neighbouring property.



4. Regulatory requirements

In line with the Housing Act 1983 (Vic), registered agencies must have an effective procedure in place to deal with complaints from tenants and prospective tenants. They must also take all reasonable steps to resolve complaints within 30 days of receipt.

The Performance Standards set clear expectations for how registered agencies deliver services. The Performance Standards and requirements relevant for complaints management are:

Performance Standard 1 – Tenant and housing services

- Provide responsive and accessible customer service, with clear service standards and multiple contact options

Performance Standard 3 - Engagement and community cohesion

- Provide accurate, accessible information on rights, services, standards and how to engage or complain
- Provide effective processes for complaints, appeals, and feedback that are easy to use, timely, and fair, and that drive improvement

Performance Standard 6 – Management, risk and oversight

- Use tenant feedback, complaints and performance data to drive continuous improvement in housing services and outcomes.

The Housing Registrar's complaint's role is focused on complaints about registered community housing agencies in Victoria.

The Registrar will review complaints from people affected by decisions of a registered agency about housing where the matter has not been satisfactorily resolved through the agency's complaints process. The Registrar's stated focus is to help facilitate local resolution where possible and to check whether the agency has acted in accordance with its own policies and procedures.

Under the regulatory framework, registered agencies are responsible for managing and resolving complaints in the first instance. The agency should take all reasonable steps to resolve the matter and provide a written response within 30 days. The written response should make clear the outcome of the complaint and the reasons for any decisions made. If it may take longer than 30 days, this should be discussed with the complainant. If the complainant remains dissatisfied, they should be able to ask the agency to review its decision through the agency's internal appeals or review process.

Where the complaint is still unresolved, or the agency has not resolved it within 30 days, the complainant can refer the matter to the Housing Registrar. The Registrar will assess whether the agency has met its obligations under the Housing Act and Performance Standards and, where appropriate, assist the complainant and agency to resolve the issue. If the Registrar finds that the agency has not met its obligations, it may take regulatory action.

A compliant complaints system should include:

- clear, accessible and promoted information about how to complain;
- multiple ways for renters, applicants and other stakeholders to make a complaint;



- timely acknowledgement, investigation and written response;
- an internal review or appeal pathway;
- clear information about external escalation options;
- accurate complaint records
- a complaints register which records complaints from all sources, including tenants and prospective tenants. At a minimum, the register should record: complaint source; property type; date complaint received; focus of complaint; date complaint resolved; complaint outcome;
- regular review of complaint themes, outcomes and timeframes; and
- use of complaint data to improve services, systems and practice.

This is consistent with the CHIA Vic complaints policy template (*appendix A*), which provides for clear complaint pathways, accessibility supports, written outcomes, internal review and escalation to external bodies including the Housing Registrar, Victorian Ombudsman and VCAT where appropriate



5. Three Levels of Complaint Management

The Complaint Management Standard (AS/NZS10002:2014) proposes that an effective complaint management system contains two internal levels and one external level of review. The aim is to resolve the majority of complaints at the frontline level but to have systems in place for matters to be escalated where necessary.

The internal levels are:

Level 1: Early resolution

The aim of Level 1 is to resolve complaints as early as possible, preferably at the first point of contact. This requires frontline staff to be able to identify when a person is making a complaint, understand what outcome the person is seeking, and either resolve the issue directly or escalate it to the appropriate person.

Early resolution may include:

- acknowledging the issue and apologising where appropriate
- explaining a decision, process or timeframe
- correcting an error
- arranging a service response
- referring the issue to the relevant team, or
- agreeing on the next steps with the complainant

Not every issue raised by a renter or applicant will be a complaint. Staff should be supported to distinguish between a complaint, a request for service, a tenancy issue, an appeal or review request, and general feedback. However, where a person is expressing dissatisfaction and expects a response or resolution, the matter should generally be treated as a complaint and recorded accordingly.

Level 2: Internal review or appeal

Where a complaint cannot be resolved at Level 1, or where the complainant is dissatisfied with the response, the matter should be escalated for internal review.

In the Victorian community housing context, an internal review or appeal generally means a request for the CHO to reconsider a complaint outcome or decision. Wherever possible, the review should be undertaken by a person who was not directly involved in the original decision or handling of the complaint.

The internal review should consider:

- the original complaint and outcome sought
- the information relied on by the original decision-maker
- whether relevant policies, procedures and legal obligations were followed
- whether the complainant was treated fairly and respectfully
- whether the outcome was reasonable and proportionate, and
- whether any further action, remedy or service improvement is required

The complainant should be advised of the review outcome in writing, including reasons for the decision and information about any further external review options.



Level 3: External Review

Where a complaint remains unresolved after the CHO's internal process, or where the CHO has not resolved the complaint within 30 days, the complainant may seek assistance from an external body.

The main external escalation pathways for Victorian community housing complaints are:

- **Housing Registrar**

The Housing Registrar is the first external pathway for unresolved complaints about registered community housing agencies.

- **Victorian Ombudsman**

The Victorian Ombudsman may be an option where the complainant remains dissatisfied after raising the issue with the CHO and the Housing Registrar.

- **Victorian Civil and Administrative Tribunal or Rental Dispute Resolution Victoria**

VCAT or RDRV may be the appropriate pathway where the issue relates to tenancy rights under the Residential Tenancies Act 1997, such as repairs, rent, compensation, breaches or possession matters.



6. External escalation Pathways

Where a complaint cannot be resolved through the organisation's internal complaint management process, complainants should be informed of available external review mechanisms. External review provides an independent assessment of the complaint and helps ensure accountability and transparency in the delivery of housing services.

Community housing organisations should clearly communicate to complainants when they have reached the end of the internal complaints process and provide information about appropriate external bodies that may review the matter.

Housing Registrar (Victoria)

The Registrar of Housing Agencies, supported by the Office of the Housing Registrar, is established and authorised under the *Housing Act 1983* (Vic) and sits within the Department of Treasury and Finance.

In addition to the Housing Registrar's responsibilities for registering and regulating CHOs, the Housing Registrar is empowered to investigate complaints about CHOs.

When investigating complaints, the Housing Registrar may request that CHOs produce relevant documents and provide responses to questions to assist in their investigation. In certain circumstances, they may inspect properties or offices, which may include taking statements and obtaining further evidence from renters, staff and other parties. A CHO must co-operate with an investigation conducted in relation to it by the Housing Registrar.³

Following an investigation, the Registrar will determine based on the available evidence if further regulatory action is required.

The Housing Registrar has broad intervention powers available under the *Housing Act* to remedy non-compliance with Performance Standards, including giving directions to a CHO where it is unwilling or unable to resolve the non-compliance. CHOs are required to comply with directions given by the Housing Registrar following an investigation.⁴

Victorian Ombudsman

The Victorian Ombudsman investigates complaints about the administrative actions of public sector organisations, and organisations funded by government to provide public function, including community housing.

The Ombudsman may investigate issues such as:

- unfair or unreasonable administrative decisions
- failure to follow proper processes
- delays in responding to complaints
- systemic issues in complaint handling
- failure to provide appropriate services.

The Ombudsman generally expects that complainants have first attempted to resolve their complaint directly with the organisation and/or the Housing Registrar before seeking external review.



Further information is available at: <https://www.ombudsman.vic.gov.au/>

Victorian Civil and Administrative Tribunal (VCAT) and Rental Dispute Resolution Victoria (RDRV)

VCAT and RDRV provides all renters (public, community and private) an independent and cost-effective avenue for resolving disputes where a landlord has breached the *Residential Tenancies Act 1997* (RTA) or their residential tenancy agreement.

Some rental disputes are now managed through RDRV, a free dispute resolution and case management service provided by VCAT. RDRV can assist renters to resolve common disputes, including bond, compensation, repairs and excessive rent matters, before they proceed to a formal hearing. If a matter cannot be resolved through RDRV, it may continue to a hearing.

VCAT remains the appropriate pathway for many tenancy disputes, including those about breaches of duty, notices to vacate, rent arrears, possession and other matters that arise under the Residential Tenancies Act

Where a complaint raises issues that are more appropriately dealt with as a tenancy dispute, the complainant should be referred to the relevant VCAT or RDRV pathway rather than managed only through the CHO's complaints process.



7. Promoting Access

Barriers to making a complaint

Renters, applicants and others may face significant barriers to raising issues or making a complaint. It can be difficult and intimidating for anyone to make a complaint, and this is particularly so where a dissatisfied client may feel disempowered. Barriers to making a complaint might include:

- Renters may be afraid or feel intimidated about complaining to their rental provider as they may fear they could be evicted. Applicants may also be concerned that their place on the waiting list will be affected if they make a complaint.
- Renters and applicants may not want to sound as though they are criticising the organisation by making complaints.
- Renters and applicants may face language or cultural barriers, or be living with disability, making it harder to fill out forms, raise an issue over the phone or have the confidence to complain.
- Online forms can be too complicated for some people to use; online forms also rely on literacy and computer skills as well as internet access. CHOs should ensure that alternate ways to make a complaint are available.
- Staff may fail to identify an issue as a complaint and manage it appropriately, and/or the CHO's systems for identifying and diagnosing complaints may need improvement.

Lowering Barriers

There are a number of actions that CHOs can take to lower barriers for renters, applicants and other stakeholders to make a complaint. It is important for CHOs to ensure they allow for and encourage complaints to be made through multiple channels, minimising the potential for cultural, linguistic or technology literacy barriers.

It is also important to take steps to reduce the potential for intimidation, for instance by ensuring that people can make their complaint to anyone in the organisation. This relies on staff training to ensure that everyone in the organisation has the capacity and capability to receive a complaint.

CHOs can help lower barriers for complainants by promoting access to advocates who can assist the complainant with the complaint process. Relevant advocacy organisations include:

- [Tenancy Assistance and Advocacy Program \(TAAP\)](#)
- [Disability Advocacy Victoria](#)

Providers should consider the following elements of an accessible complaints system:

Does your organisation's approach to complaint management:	✓
Encourage feedback from renters and applicants, whether positive or negative?	
Allow complaints to be made over the phone?	
Allow complaints to be made in writing?	
Provide access to a translating and interpreting service for non-English speakers?	



Allow complaints to be made online, through your website and social media pages?	
Ensure that anyone in the organisation has the capacity to receive a complaint?	
Allow people to make a complaint anonymously if they wish?	
Enable people to use an advocate to help or represent them in the complaint process?	

Using social media for complaints

Customers in a range of sectors, including community housing, are increasingly turning to social media as a method to interact with organisations. The most important thing to remember is that comments and responses may be visible to other users, potentially creating a reputational risk if online complaints are not managed well.

Some tips for responding to complaints on social media and using social media to handle complaints include:

- Ensure staff are prepared and aware of procedures for responding to feedback received through social media.
- Promptly acknowledge the complaint and then move the complainant to direct messages or the formal complaints process.
- Do not discuss personal, tenancy or sensitive information publicly.
- Develop Community Guidelines for social media and hide or delete comments which do not meet these guidelines.

Promoting your complaints policy

Promoting your complaints policy is important to ensure renters, applicants and other community members are aware of the process for making a complaint. This assists in lowering real or perceived barriers to making a complaint.

Promoting the complaints policy and procedure also allows an organisation to set expectations around what complainants can reasonably expect you to address, and issues that should be referred elsewhere.

Renters and applicants should be informed of their right to complain about their housing services, and the process for doing so, during the application process, at the start of their tenancy and throughout a tenancy. Applicants should be referred to Tenant Advice and Advocacy Program for support where necessary.

The Housing Registrar monitors how CHOs make information on complaints and appeals readily available and promoted to renters.

You might consider:

- Including information about complaints in regular newsletters
- Providing brochures or information booklets on complaint management
- Displaying posters in your offices
- Ensuring information about your complaints policy and how to make a complaint or appeal is readily available and well promoted on your website



- Making information on your complaints policy available in multiple languages.

In some cases, organisations may prefer to promote their complaints policy as “feedback” or “complaints and compliments” to show that they are willing to receive feedback of all types.

The following checklist identifies some of the key issues and processes that should be promoted to renters, applicants and other stakeholders.

Do your renters and applicants know	✓
How they can make a complaint and provide feedback?	
Where they can get information, paperwork and forms to make or support their complaint?	
What supports are available to assist them in making a complaint?	
The information they need to provide when making a complaint?	
How their complaint will be handled?	
Who will be responsible for handling their complaint?	
When they should expect a response?	
How they can obtain feedback about the status of their complaint?	
Where else they can take their complaint if they aren't satisfied with the outcome?	
How they can provide feedback on their experience of your complaint management processes?	

Communicating with Complainants

Organisations should regularly report to complainants on the status of their complaint and should clearly communicate the outcome of the complaint. This is important to ensure complainants understand the organisation's procedures and have reasonable expectations around the timeframe and nature of resolution they will likely receive.

Organisations should indicate to complainants the timeframe within which they can expect a response. It is important to keep this commitment, and to communicate the status of the complaint within the timeframe even if the complaint is not yet resolved.

Ensuring complainants are informed about the progress of their complaint can also provide assurance that their complaint is being managed seriously and effectively.



8. Stakeholder Engagement

CHOs should consult with key stakeholders in the development and review of policies, procedures and systems for managing complaints. Key stakeholders include operational and management staff, renters, applicants and neighbours. This is also a regulatory requirement. Under Performance Standard 3 – Engagement and community cohesion, registered agencies are required to engage tenants meaningfully in decisions that affect them.

Approaches to engagement

Approaches to consultation should be designed to foster clear communication channels and engagement with stakeholders. Best practice and widely recognised principles and values for stakeholder engagement have been developed by the International Association for Public Participation (IAP2).

A widely used tool for considering appropriate engagement approaches is IAP2's Public Participation Spectrum, an internationally recognised standard for approaches to engagement. The spectrum outlines five levels of engagement: inform, consult, involve, collaborate and empower. A good practice approach to complaint management will engage stakeholders on the first three levels of the spectrum.

The spectrum can be used to define the role of stakeholders in the consultation, and to clearly define the level of influence that stakeholders will have on the outcomes.

Level	Inform	Consult	Involve
Participation objective	To provide stakeholders with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and solutions.	To obtain stakeholder feedback on analysis, alternatives and decisions.	To work directly with stakeholders throughout the process to ensure that stakeholder concerns and aspirations are understood and considered.
Stakeholder Groups	Renters, applicants and neighbours	Renters, potentially through renter advisory group or renter committee	Operational and management staff Renters, potentially through renter advisory group or renter committee



Engagement principles

The following principles have been developed as a guide to help inform approaches to stakeholder engagement. A good practice approach to engagement will consider the following:

- There should be agreement in advance about the purpose, expectations and intended outcomes of the engagement.
- Participants should be aware of what they can and cannot influence.
- Information should be provided to inform participants' inputs. The quality of participation is highly dependent on the quality and timing of information provided.
- Targeted communications should provide information and promote participation.
- A variety of engagement techniques should be used to maximise visibility, accessibility and opportunities to participate.
- Engagement mechanisms should maximise people's ability to participate. Whenever possible, stakeholders should be engaged early in the process, rather than just to comment on a finalised policy.
- Adequate time, team support and resources should be made available to support the engagement process.
- Participants should be aware of how their inputs will be used and given feedback on the outcomes.

Involving renters

CHOs should work directly with renters, including through their renter advisory group or renter committee, to involve them in the development, review and improvement of their complaint handling policy and procedures. Consider also involving bodies that represent other CHO clients, such as applicants. Renter advice and input can also be sought on monitoring and reporting processes. For example, a renter advice group can guide the establishment of key performance indicators and benchmarks. In addition, the CHO should report regularly to renters on its performance in managing complaints.



9. Resolution

A good complaints policy will focus on resolution of the issue raised, rather than simply following procedure. This means that staff need clear guidance around the type of complaints that they should escalate to senior staff, complaints which they can deal with directly, including the resolution options available to them, and the process for recording complaints consistent with the reporting requirements of the Housing Registrar.

It is important to note that while a CHO will aim to address and resolve the vast majority of complaints raised with them, and that most complainants will behave responsibly, there will be some complainants who persist in making complaints beyond the CHO's ability to respond. This is known as serial or unreasonable complainant conduct. These complaints still require resolution, but managing these complaints will require specific strategies. Tips for managing unreasonable complainant conduct are included in the procedures section.

Timeliness and managing expectations are critical aspects of complaint resolution. It is important that complainants are made aware of your organisation's expected response timeframes. Where a response or resolution is taking longer than anticipated, communicate this with the complainant, explain the reasons, and provide a revised timeframe.

Appendix J of the Standard (AS/NZS10002:2014) categorises complaint redress into the following options:

Communication with the complainant, either verbally or in writing, which may include:

- Explaining why the problem occurred
- Giving reasons for decisions
- Apologising
- Providing information about their further options
- Reaching agreements with the complainant through mediation or other resolution approaches.

Rectification of the problem, which could include:

- Stopping an action that should not have been started or cancelling an intended action
- Changes to processes or services to ensure the problem does not happen again
- Ensuring compliance with obligations
- Correcting records.

Mitigation to reduce adverse consequences, which could include:

- Providing assistance and support
- Refunding fees or charges
- Waiving fees or debts.

Satisfaction of the concerns of the complainant, such as by:

- Publicly acknowledging the mistake
- Committing to improving systems, procedures or practices
- Taking disciplinary action.

Compensation, including reimbursement of funds or a goodwill gift for the worry or distress caused to the complainant.



10. Planning and reporting

Strategic planning

CHOs should consider their complaint management systems in the context of their strategic and risk management planning. Where a situation that may increase complaints is foreseen, strategies to mitigate this should be considered. Good communication with renters and stakeholders – before and/or during the event – about their rights and the CHO's obligations can be valuable in this regard. Acting to reduce the likelihood of complaints in advance of a known event can save valuable resources.

Examples of situations that may give rise to an increase in the number of complaints include:

- Renters moving into newly constructed properties with defects that involve maintenance issues
- Renters being relocated to make way for a redevelopment
- The CHO is growing rapidly or diversifying its business, which may lead to frontline and management resources being stretched temporarily
- New renter services are introduced by the provider
- Internal restructure and/or staff turnover.

Good complaint management practices should support the organisation's risk management planning, and vice versa. The following risk management resource for CHOs may be useful:

- [The Risk Management Challenge for Community Housing Providers \(Complispace, 2011\)](#)

Continuous improvement

It is essential for organisations to collect, analyse and report on complaints to ensure that complaints are used to inform organisational learning and continuous improvement. Complaints data should be regularly reviewed to identify potential service improvements and areas for staff training. This may include ongoing regular reviews and an annual review of complaint data, including:

- the number of complaints and appeals
- the issues complained or appealed about
- the time taken to resolve complaints
- the outcomes of complaints and appeals
- feedback from renters/applicants who have used the system
- feedback from staff to ensure that the process is effective and user friendly.

Some organisations use integrated risk, assurance and complaint management software to monitor trends in complaints and response times.

Data collection and analysis should be accompanied by regular internal reporting. For instance, some organisations report monthly to their Board to identify trends, ongoing issues and opportunities for service improvement. Internal reporting also ensures there is oversight of the complaint management process from within the organisation. This may be a senior staff member, the Board or a subcommittee of the Board, such as a Risk and Audit Committee. In addition, it is important to report regularly to renters, including via any renter advisory group or committee.

Regular reviews should be undertaken of the policies, procedures and performance outcomes of the complaint management system. This could be part of a broader rolling internal audit program.

Measurable and reportable benefits of a well-run complaints management system can include:



- Learnings from complaints are used to improve service and reputation
- Plans for organisational change take the impact on complaint management into account
- Staff skill gaps and training needs are identified.

Performance indicators

Organisations should evaluate their policy and procedures against relevant performance indicators that are able to drive organisational review and improvement.

Treating a decrease in complaints as a positive indicator may lead to a reluctance to identify or receive complaints. Alternative indicators should be developed which focus instead on the resolution of complaints and which provide opportunities for organisational improvement.

Renter satisfaction surveys provide a key opportunity for quality assurance by testing client experience of your complaint management process.

Potential performance indicators include:

- Proportion of complaints resolved within identified timeframes
- Proportion of complaints satisfactorily resolved
- Average length of time to resolve complaints
- Length of time for initial response
- Trends in the number of complaints in relation to a specific issue, to test effectiveness of resolution
- Level of renter satisfaction with complaints procedures
- Level of renter awareness of complaints procedures.

External reporting

Reporting externally on how complaints are managed provides an important opportunity to promote your complaints policy and procedure, encourage feedback from renters and applicants and other users, and celebrate positive outcomes of complaints.

Celebrating positive outcomes of complaints can foster a positive complaints culture, where complaints are seen as opportunities for service improvement and renters and applicants are confident in exercising their right to complain.

You might consider reporting on complaint management:

- Online through your website
- In your annual report
- In regular newsletters or letters to renters, applicants and neighbours
- By providing formal feedback to your renter advisory group
- By acknowledging positive complaints resolution or good customer service through staff awards.



11. Complaints Policies and Procedures

The complaints policy is an important document that will guide and drive the organisation's approach to managing complaints. It should be made publicly available, and it is important that staff are supported to be familiar with the document.

A template policy is attached as Appendix A and a guide to developing a complaints procedure is attached as Appendix B.



12. Professional Development

Complaints management in social housing is a complex, challenging, time consuming, and at times confronting task. It is therefore critical that staff responsible for this task receive adequate training and that the culture of the organisation supports good complaint management.

Section 6.4.5 of the Standard (AS/NZS10002:2014) states that all staff who handle complaints should be appropriately trained in complaint management and the implementation of complaint management procedures relevant to their role, including specific training on receiving and resolving complaints from disadvantaged and vulnerable people.

Dedicating appropriately trained staff to this area of a CHO's business can significantly save time and reduce staff stress. Training in best practice decision making can improve decision making procedures and overall housing management practices, improving services generally and reducing the need for complaints to be made. A level of training in complaints management is desirable for all staff, since complaints can be received through many channels.

Training Approach

Complaint management training should build both a positive complaints culture and practical complaint handling skills. Two levels of training should be covered:

- **Welcoming complaints**
Training should reinforce complaints as an opportunity to improve services, strengthen accountability and increase renter satisfaction. Management should be involved so this approach is embedded across the organisation.
- **Practical complaint handling**
Staff who receive, identify, manage or escalate complaints should be trained to recognise complaints, understand the complainant's expectations, follow the correct pathway and know when to escalate.

Staff, and contractors where relevant, should regularly refresh their knowledge of the organisation's complaint management policy and procedure.

Skills

All staff members who may receive a complaint need to be well trained in dealing with clients, identifying issues, and following procedures. To effectively manage complaints, the following attributes are desirable:

- Empathy
- Respect and courtesy
- Resilience
- Patience and tolerance
- Listening skills
- Good judgement and common sense
- Assertiveness and confidence
- Willingness to assist
- Interpersonal skills
- Understanding of the CHO's systems and processes
- Rapport building skills
- Strong verbal and written skills.



Appendix F of the Standard states that staff also need to be empowered with correct level of authority to determine and implement the best course of action.

Knowledge

Knowledge in the following areas is recommended for staff involved in complaint management:

- Negotiation techniques
- Procedural fairness
- Language and cultural differences which may affect the complaint process
- Mental distress and its effect on behaviour
- Power imbalance and its effect on negotiations
- Referral options, pathways and process alternatives

Professional development checklist

Has your organisation:	✓
Included training on your organisation's complaint management policy and procedure in induction training for all staff?	
Provided training on your organisation's complaint management policy and procedure to the staff who undertake complaint management activities, including clarifying which issues can be handled at the frontline, which need to be escalated to senior staff, and what authority staff have in resolving complaints?	
Provided training to relevant staff on complaint management and resolving complaints from disadvantaged clients?	
Provided training to staff on "de-escalating" appropriate issues so they can be resolved at the frontline?	
Developed a customer relations charter and provided training on customer relations to relevant staff?	
Recognised the importance of complaints management to your business by adequately resourcing it?	
Provided training in best practice decision making to housing management, rent review, property management and other relevant staff to proactively improve housing management services?	
Set up a system for identifying training needs among staff who undertake complaint management activities?	
Educated your maintenance and other relevant contractors about your organisation's complaint management policy and procedure?	



13. Self-assessment

This high-level self-assessment checklist provides an opportunity for CHOs to evaluate their complaint management policy, procedure and practice against the key elements of a good practice approach.

Does your organisation's approach to complaint management:	✓
Treat complaints as an opportunity for organisational learning and improvement?	
Encourage renters, applicants and community members to exercise their right to complain?	
Focus on resolution of the issue rather than simply providing a response?	
Ensure key stakeholders are consulted in developing and reviewing the policy and procedure?	
Clearly define roles and responsibilities for handling complaints?	
Ensure information and processes are visible and accessible?	
Provide multiple channels for renters, applicants and community members to make complaints?	
Ensure ongoing communication is maintained with complainants throughout the process?	
Ensure that anyone in the organisation has the capacity to receive a complaint?	
Ensure all staff members are properly trained to identify, diagnose and handle complaints?	
Encourage external reporting on complaint management outcomes?	
Ensure evaluation against performance indicators that drive organisational improvement?	



15. Resources and Further Information

The following resources informed the development of this guide and were used to identify good practice approaches to complaint management. Readers may find them useful for further information and guidance.

CHIA NSW Complaint Management Framework for Community Housing Providers

Australian / New Zealand Standard AS/ANZ 10002:2014. Guidelines for complaint management in organisations - guidelines to help with complaints handling practices can be purchased from the Standards Australia Website: www.standards.org.au

Australian Competency and Ethical Framework For Complaint Professionals www.socap.org.au

Housing Appeals Committee n.d., Appealable Issues, viewed 27 June 2016, <http://www.hac.nsw.gov.au/what-is-an-appeal/what-can-be-appealed/appealable-issue-for-for-applicants-and-tenants-of-a-social-housing-provider> Independent Housing Ombudsman, UK, September 2002. *(How) are you being served? A good practice guide on complaints handling in Housing Associations.*

National Community Housing Standards Manual 2010, Third Edition

NCAT (NSW Civil and Administrative Tribunal) 2016, Social Housing, viewed 27 June 2016, http://www.ncat.nsw.gov.au/Pages/cc/Divisions/Social_housing/Social_housing.page.aspx

NRSCH (National Regulatory System for Community Housing) 2014, Evidence Guidelines - Performance outcome 1f Managing and addressing complaints and appeals relating to providing housing services, pp 14-16

NSW Ombudsman, 2012. Managing Unreasonable Complainant Conduct Practice Manual, 2nd Edition

NSW Ombudsman, 2013. Complaint handling toolkit for community service organisations

NSW Ombudsman, 2015. Complaint management framework

NSW Treasury 2015. Benchmarks for Industry-based Customer Dispute Resolution www.treasury.gov.au

Society for Consumer Affairs Professionals Australia (SOCAP) and the Australian Centre for Justice Innovation (ACJI) Monash University 2016. Small business complaints toolkit: building better relationships through complaints

The Benchmarks for Industry-based Customer Dispute Resolution - standards for industry-based dispute resolution in Australia and New Zealand. www.treasury.gov.au

UK Housing Quality Network (HQN) Complaints Toolkit

Victorian Housing Registrar Complaints Handling Practice Note

Victorian Ombudsman, 2007. Good Practice Guide. *Victorian Ombudsman's Guide to complaint handling for Victorian Public Sector Agencies*



Appendix A

[CHO logo]

CHIA Vic Template: Complaints Policy

[Note: This is a template policy for community housing organisations that is intended to help meet the obligation to have a complaints procedure as required by section 97 of the Housing Act 1983. It should be tailored to the specific needs of the organisation and linked to appropriate policies and procedures.]

Complaints Policy

Date created	
Review date	
Reviewed by	

Purpose

The aim of this policy is to ensure that complaints handling responsibilities and pathways are clear and that procedures and approaches are fair, equitable, consistently managed and properly documented.

Scope

This policy applies to complaints and appeals made to [CHO] by:

- Renters and prospective renters, their advocates, and other stakeholders; and
- People whom [CHO] has assisted to make an application for social housing through the Victorian Housing Register (VHR).

This policy does not apply to complaints or feedback received from people who are not renters, prospective renters, or applicants for social housing. This includes:

- Complaints or grievances by employees of [CHO];
- Complaints by contractors of [CHO]; or
- Complaints relating to the behaviour of neighbours (see [CHOs Good Neighbour Behaviour Policy / Anti-social, Destructive or Dangerous Behaviour Policy]).

[CHO] recognises that where complaints and/or feedback fall outside of the scope of this policy, it will be handled in accordance with the 'no wrong door' principle and will be resolved by referring the complainant to the correct complaint and/or feedback pathway.

Overview



[CHO] welcomes and values complaints and feedback and is committed to responding to this feedback to improve service delivery.

For the purposes of this policy, feedback can be:

- A complaint about the way [CHO] have gone about delivering housing or related services; and
- An application for an internal review of a decision made by [CHO] in relation to housing, application or services.

[CHO] will handle every complaint through a clear and consistent process and are committed to finding a quick and effective resolution. There is also a commitment to learning from complaints to improve services.

Accordingly, [CHO] will:

- Provide clear information about how to lodge a complaint or apply for an internal review and how to escalate a complaint to the Housing Registrar;
- Provide support to the complainant to make a complaint or appeal to ensure the process is accessible;
- Make referrals to appropriate advocacy and legal services to assist complainants (renters can also refer to the renter support information sheet);
- Respond to the complaint and/or appeal promptly, fairly and transparently;
- Respect the complainant's privacy and confidentiality when making a complaint or applying for an internal review;
- Treat the complainant in a way that is objective, respectful, and fair including consideration of human rights;
- Be accountable for decisions as a service provider;
- Not take any adverse action against the complainant simply because a complaint or lodgement of an appeal; and
- Use the outcome of complaints and appeals to improve service delivery.

What is a complaint?

An expression of dissatisfaction made to or about an organisation (either written or verbal), related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected. The subject of the complaint may include:

- A policy or decision made by [CHO] staff about a rental housing matter;
- The quality of an action, decision or service provided by [CHO] staff;
- A delay by [CHO] staff in taking an action, making a decision or delivering a service.

Who can make a complaint?

A renter or a prospective renter may make a complaint to [CHO] about its products, services, staff, or the handling of a complaint. A representative of a renter or a prospective renter (such as an advocate or a family member) may also make a complaint on a complainant's behalf. The term 'complainant' is used to refer to the individual or organisation that makes a complaint.

[CHO] is committed to being accessible and responsive to all complainants regardless of ethnic identity, national origin, religion, linguistic background, sex, gender expression, sexual orientation, physical ability or other cultural or personal factors.

Please see [\[CHOs Renter Support Services Information Sheet\]](#) that lists advocates and supports that may be able to assist a complainant with the complaints process.



How to make a complaint

A complainant who is affected by decisions of [CHO] on matters relating to rental housing, can ask for the complaint to be dealt with under the complaints and appeals procedure.

Complaints can be made by:

- Telephone: [Insert telephone number];
- Online: [Insert web address. If CHO has an online complaint form, include instructions on how to access it from the home page];
- Email: [Insert email address];
- Post: [Insert contact name and postal address];
- In person: [Insert address].

[CHO] is committed to ensuring a navigable and culturally safe complaints process that is accessible to everyone. If a complainant has specific communication needs or barriers, the complainant can communicate this to [CHO] so assistance can be provided by:

- Using an assistance service, such an interpreter or TTY (for free);
- Assistance with reading or writing; and
- Communicating with another person acting on the complainant's behalf.

How a complaint will be handled

[CHO] will acknowledge a complaint within 3 business days of receiving the complaint.

[Insert relevant person] will contact the complainant to discuss the complaint within [insert number] business days. [Insert relevant person] will also take whatever steps are necessary to try to resolve the complaint. This may include:

- Taking direct action to resolve the complaint; and
- Referring the complaint to the relevant team or manager for investigation

[CHO] will try to resolve the complaint as quickly as possible. Where this is not possible, [CHO] will inform the complainant of the outcome of the complaint and provide reasons in writing within 30 calendar days of receiving the complaint. If there is any reason for a delay, [CHO] will contact the complainant and advise when a response can be expected, and the reason for the delay.

A complainant can check the status of the complaint by contacting [insert relevant person].

Complaint conduct

The success of the complaints process depends on:

- [CHOs] ability to work effectively and efficiently;
- The health, safety, and security of [CHO] staff;
- [CHOs] ability to allocate resources fairly across all complaints received.

[CHO] requires staff to be respectful and responsive in all of their communications. Where a complainant's behaviour or conduct raises health, safety, resource, or equity issues, this may significantly affect the complaint handling process. [CHO] will act proactively and decisively to manage unreasonable complainant conduct and will support staff to do the same in accordance with this policy. [CHO] may adjust its communication method/s to minimise any adverse impacts for staff and complainants.



The outcome of a complaint

[CHO] will contact the complainant to advise the outcome of the complaint and provide details of:

- Actions taken in response to the complaint;
- The reasons for the decision made;
- Where [CHO] has made an error, the steps that will be taken to redress the situation; and
- Information on options for internal or external review if the complainant is not satisfied with the decision.

A complaint outcome will be made in writing with written reasons to the complainant. Once a decision is made in relation to the complaint, the details of the complaint will be recorded on the [CHOs] Complaints Register and closed.

It is a regulatory requirement for [CHO] to record the complaint on a Complaints Register and provide it to the Housing Registrar on an annual basis for regulatory purposes.

Requesting an internal review of the outcome of the complaint

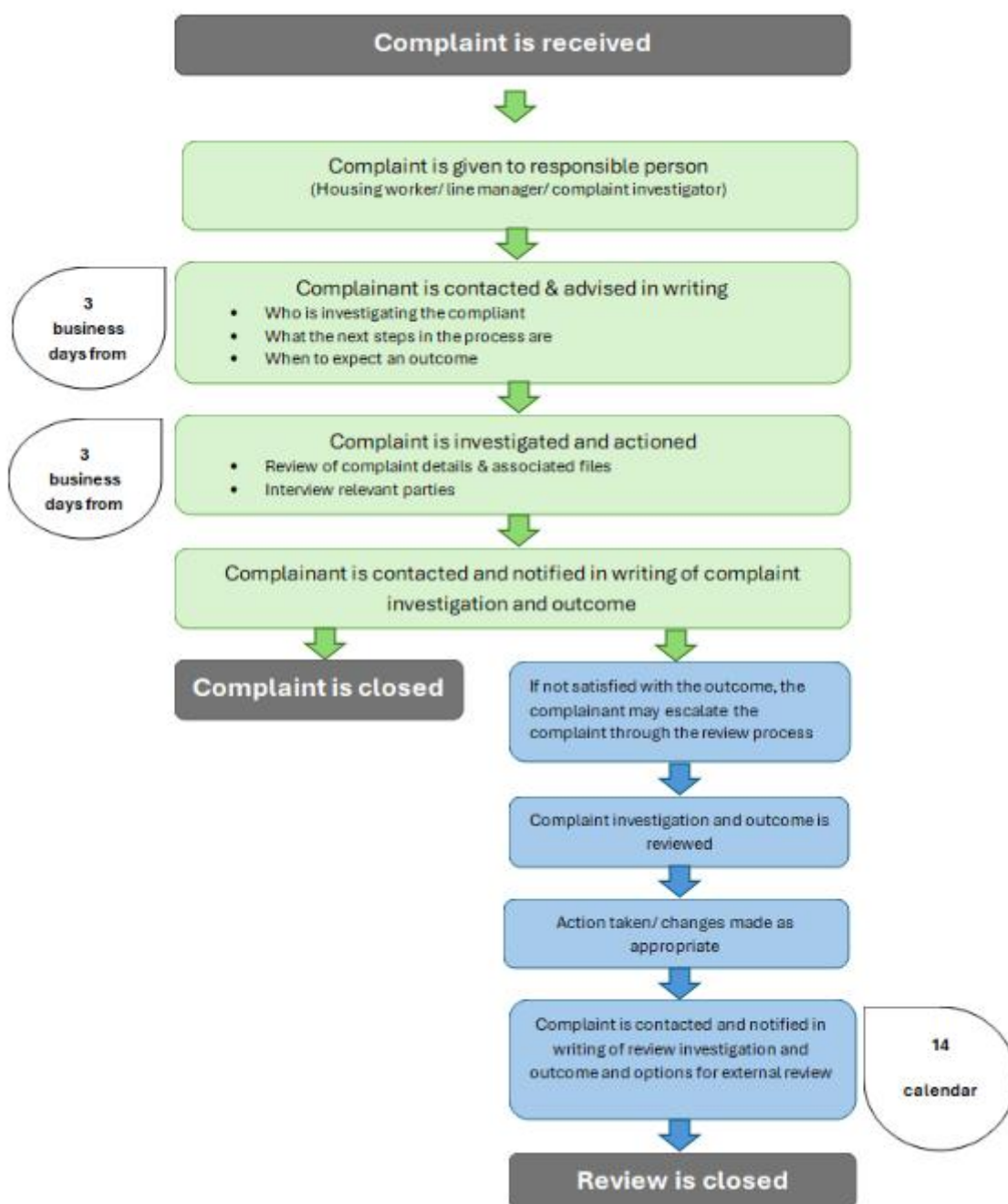
The complainant can request that a decision or outcome of the complaint be reviewed by [CHO] where the complainant believes it to be incorrect.

The review will be conducted by [insert relevant person] who has not had any prior involvement with the complaint. [CHO] will inform the complainant of the outcome of the internal review and provide reasons in writing within 14 calendar days of the request.

A complainant can request copies of documentation related to their tenancy or complaint as well as copies of relevant policies. [CHO] will respond to a request for documentation related to the complaint with copies of documents or clear reasons why any documents have not been provided (e.g. documents belong to a third party, or documents that contain another person's private/sensitive information). Please refer to [CHOs Privacy Policy].

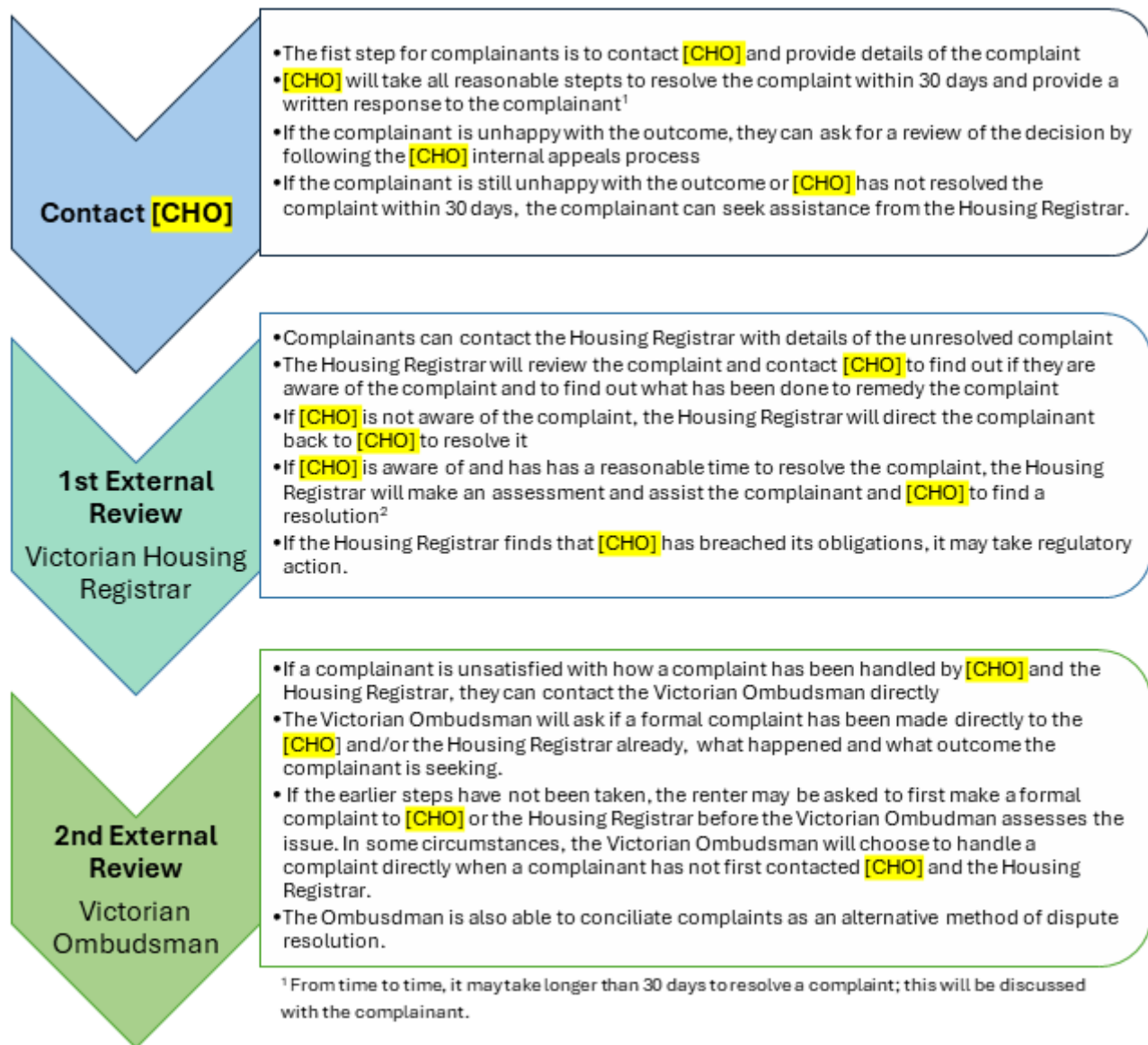


Below is a flow chart that provides a graphic overview of [CHOs] complaints process.



External Complaint Bodies

There may be times where a complainant is dissatisfied with the outcome of their complaint after an internal review by [CHO]. In these circumstances, there are external bodies that can deal with different types of complaints about [CHO]. The following infographic shows how a complainant can escalate a complaint where they are not satisfied with the process provided by [CHO].



¹ From time to time, it may take longer than 30 days to resolve a complaint; this will be discussed with the complainant.

² In some circumstances it may not be possible to resolve the complaint to the complainant's satisfaction however the reasons for this will be communicated.



Housing Registrar Details

If [CHO] has not resolved the complaint within 30 days, or the complainant is unsatisfied by the decision made about the complaint, the complainant may contact the Victorian Housing Registrar:

- Telephone: 03 7005 8984
- Online: <https://www.vic.gov.au/making-complaint-about-community-housing>
- Post: Housing Registrar, GPO Box 4379, Melbourne, Victoria 3001

Victorian Ombudsman Details

If a complainant continues to be dissatisfied after discussing an issue with [CHO] and the Housing Registrar, they can contact the Victorian Ombudsman:

- Telephone: 1800 806 314
- Online: <https://www.ombudsman.vic.gov.au/complaints/make-complaint/>
- Post: Level 2, 570 Bourke Street Melbourne VIC 3000

Victorian Civil and Administrative Tribunal

A complainant may also have statutory rights of appeal which should be directed to the Victorian Civil and Administrative Tribunal:

- Telephone: 1300 01 8228
- Online: <https://www.vcat.vic.gov.au/>
- Email: renting@vcat.vic.gov.au

Confidentiality

All complaints and appeals are confidential and no identifying information will be shared without permission. When a complaint or appeal is made, [CHO] will record:

- Name and contact details;
- Whether the complainant has communication, cultural or assistance needs;
- Details of the complaint or appeal; and
- What outcome the complainant is seeking.

[CHO] uses this information to respond to a complaint and to improve the services that relate to a complaint. All personal and sensitive information collected in the complaints process will be kept secure and managed in accordance with the Privacy and Data Protection Act 2015.

[CHO] may share information to promote the wellbeing or safety of a child or group of children, or to prevent family violence, with other approved information sharing entities as legislated by the Victorian Government.



Related policies

[Insert a description of relevant policies, for example those relating to privacy and confidentiality, renter voice, good neighbour behaviour, and other complaint handling policies outside the scope of this policy].

Legislation and standards

This policy meets the legislative requirements of section 97 of the Housing Act 1983 and the regulatory requirements of the Performance Standards established under section 93 of the Housing Act 1983.

This policy also implements [CHO's] obligations under the DFFH Victorian Housing Register Operational Guidelines.

Transparency and accessibility

This policy is made available on the [CHO] website [www.cho.org.au/policy].

Definitions

In this policy:

Applicant	A person who [CHO] assists to apply for social housing.
Complainant	The individual or organisation that makes a complaint.
Complaint	An expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.
Complaint outcome or decision	The response provided by the [CHO] about a complaint.
Review of a complaint outcome or decision	A request by a complainant for review of a complaint outcome or decision.
VHR	The Victorian Housing Register, the state-wide common application for people seeking social housing, which can be accessed via [CHO], Homes Vic, the myGov portal or designated support providers.



Appendix B

The following headings are sample headings for your organisation's complaints management procedure. Beneath the headings are points and resources which can guide you in developing your organisation's procedure.

1. Receiving Complaints

- 1.1 Clarify who in your organisation has the responsibility for receiving and recording complaints, and how staff should keep records of complaints received.
- 1.2 Record verbal as well as written complaints.
- 1.3 Determine how you will record and respond to complaints received anonymously.
- 1.4 For verbal complaints, listen to the complainant and give them the opportunity to finish what they have to say and explain what they are seeking. Do not offer solutions before the complainant has had the opportunity to finish explaining.
- 1.5 Consider whether there is any aspect of the complaint where an apology is owed. A sincere and timely apology can de-escalate some situations. Further tips on receiving complaints are provided in the [Victorian Ombudsman's Good Practice Guide](#)
- 1.6 Appendix L of the Standard (AS/NZS10002:2014) recommends that to effectively manage complaints, relevant information must be recorded, including: the date the complaint was lodged, the complainant's contact details, any special assistance required by the complainant to interact with the CHO (such as an interpreter), the product or service the complaint relates to, whether the issue has been raised previously and whether they received a response, and the outcome sought.
- 1.7 Offer the services of a renter advocate and the opportunity to have an advocate present at meetings such as through [Tenant Advice and Advocacy Programs](#).
- 1.8 Consider assigning a unique number to each complaint to make it easier to track for both complainants and staff.
- 1.9 Identify unreasonable complainant conduct and manage accordingly.

2. Categorising complaints and assigning responsibility

- 2.1 Conduct "triage" on the complaint: first determine whether it is a complaint, an appeal, a request for service, feedback, a tenancy issue, or a mixture. Do parts of the complaint need to be dealt with separately? Delegate it to the appropriate staff.
- 2.2 Consider whether your organisation has responsibility for addressing the complaint or whether it, or an aspect of it, is a matter for another agency such as Council or Police.
- 2.3 Assess the seriousness of the complaint to determine who is best placed to manage it. For example, is it an issue about day to day service delivery which can be solved at Level 1, or does it allege serious breaches or potentially risk reputational harm to the organisation and therefore could be escalated immediately to Level 2.
- 2.4 Consider the circumstances of the person making the complaint (level of vulnerability or need, literacy and English language skills, levels of family support or networks, health, etc) and how this could affect the urgency and resolution of the complaint.



- 2.5 Make sure that the complaint is assigned to a staff member for management. This person may be a dedicated Complaints Manager, a Team Leader, or the manager of the team which is the subject of the complaint.
- 2.6 Identify unreasonable complainant conduct and determine how you will respond.

3. Acknowledging complaints

- 3.1 Acknowledge receipt of complaints promptly. Generally, CHOs do this between 48 hours and 3 days after the complaint is received.
- 3.2 Consider the best way to respond to the complaint – face-to-face, by telephone, email, letter, social media.
- 3.3 Letters will include an acknowledgement of receipt, a brief summary of the complainant's issue, the steps you plan to take (including what has been done already), and when they will hear from you again.
- 3.4 Ensure language used is clear and polite.

4. Investigating Complaints

Level 1 – frontline response

- 4.1 Discuss the issue with the complainant and, depending on the nature of the complaint, make an effort to address their concerns at this stage. This may involve asking the complainant to explain the problem and their desired outcome or arranging a time to meet with them or discuss their concerns by phone.
- 4.2 Consult policies and procedures relevant to the complaint.
- 4.3 If the complainant is not satisfied, or if the nature of the complaint is more serious, escalate the complaint to your Level 2 complaints management process.
- 4.4 Ensure that the complaint management process is recorded until finalised.

Level 2 – internal review

- 4.5 Investigate the issue thoroughly using information available to determine the facts relating to the complaint and to determine whether a policy has been breached. Consider how to address the issues raised.
- 4.6 An internal complaint management form will ensure that you do not miss important steps and that complaints are managed time efficiently.
- 4.7 Treat all complaints equitably, objectively, and in accordance with your complaints management policy, even where complainants are acting unreasonably.
- 4.8 Identify any (actual or perceived) conflict of interest early and follow your organisation's policy on managing conflict of interest.
- 4.9 Follow your organisation's privacy and confidentiality policies and procedures to ensure that the privacy of complainants is respected and protected.
- 4.10 Ensure that the complaint is recorded until finalised.



5. Addressing unreasonable conduct by complainants

- 5.1 Ensure equity and fairness – the focus of complaint handling should be on the content of the complaint, not on the person.
- 5.2 Allocate enough time and resources to maintain efficiency when dealing with unreasonable complainant conduct, which can be a significant drain on resources.
- 5.3 Ensure the health and safety of staff involved in dealing with unreasonable complainant conduct.
- 5.4 Manage complainant expectations from the beginning of the complaints process, to avoid triggering unreasonable complainant conduct.
- 5.5 Insist on respect and cooperation between complainants and staff as being a prerequisite for further contact and communication.
- 5.6 Implement policies and procedures for managing unreasonable complainant conduct and ensure staff are trained in them.
- 5.7 Focus on the specific conduct of the complainant and content of the complaint, not the person. Avoid labelling the complainant as “difficult” or “high maintenance”. Instead use the term “unreasonable conduct” which labels the behaviour, not the person.
- 5.8 Respond appropriately and consistently to complaints and complainants.
- 5.9 Monitor and review management approaches.
- 5.10 Ensure you hold debriefing sessions with staff who deal with complaints, and unreasonable complainant behaviour in particular.
- 5.11 The [Victorian Ombudsman's Good Practice Guide: Managing Complex Complainant Behaviour](#) contains further guidance and tools on managing unreasonable complainant behaviour.

6. Informing complainants of the outcome, reasons and further options

- 6.1 Once the complaint has been considered or resolved, write to the complainant to inform them about:
 - An apology
 - The outcome(s) of the complaint
 - Recognition of the wrongdoing or omission where applicable
 - The action that was taken by your organisation
 - The reasons for the action taken and the decisions made
 - What you are offering them (for example, compensation, an apology)
 - Whether corrective action has been taken
 - Information about what else they can do if they are not happy with this outcome and/or resolution
 - Where a complainant has behaved unreasonably in their dealings with your organisation, this letter can also identify the nature and/or number of interactions between them and your organisation and any formal warnings which have been given to them about their conduct.
- 6.2 Letters should be signed by a senior staff member such as the CEO to make it clear that the decision has the support of the organisation.



- 6.3 A template for a complaint handling letter is given on p. 20 of the Small Business Complaints Toolkit [Small Business Complaints Toolkit](#)

7. Record keeping

- 7.1. Your organisation's record keeping system should allow an up to date status to be made available on request by the complainant or someone in your organisation.
- 7.2. Establish criteria for responding to requests for client records.
- 7.3. Maintain a record of staff training undertaken.
- 7.4. Ensure the complaints register is complete and up-to-date.



Appendix C

[CHO logo]

CHIA Vic Template: Complaints Fact Sheet for Renters

[Note: This is a template for community housing organisations and should be tailored to the specific needs of the organisation and linked to appropriate policies and procedures.]



How do I make a complaint?

If you are a renter, household member, or applicant, and you have a complaint, you can ask for your complaint to be dealt with under [CHOs] complaints and appeals procedure [\[link to Complaints Policy\]](#).

Complaints can be made by:

- Telephone: [\[phone number\]](#)
- Online: [\[web address. If CHO has an online complaint form, include instructions on how to access it from the home page\]](#)
- Email: [\[email address\]](#)
- Post: [\[contact name and postal address\]](#)
- In person: [\[office address\]](#).

[CHO] is committed to ensuring the complaints process is accessible to everyone. If you have specific communication needs or barriers, please let us know so assistance can be provided by:

- Using an assistance service, such as an interpreter or TTY (for free);
- Assistance with reading or writing; and
- Communicating with a support worker or family member on your behalf.

How will I know the outcome of my complaint?

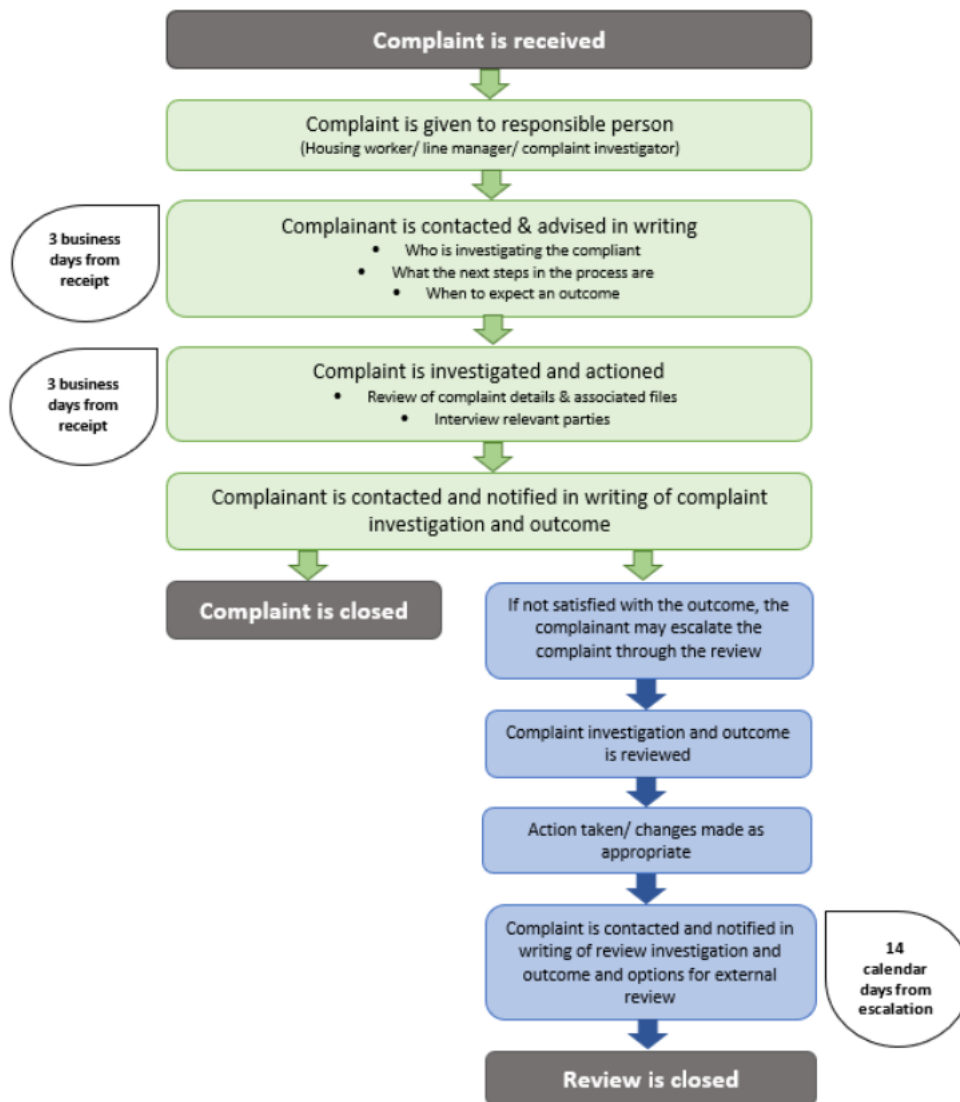
[CHO] will contact you to advise the outcome of your complaint and provide details of:

- Actions taken in response to your complaint;
- The reasons for the decision made;
- Where [CHO] has made an error, the steps that will be taken to fix the situation; and
- Information on options for internal or external review if you are not satisfied with the decision.

A complaint outcome will be made in writing with written reasons.



Below is a flowchart of how complaints are typically handled:

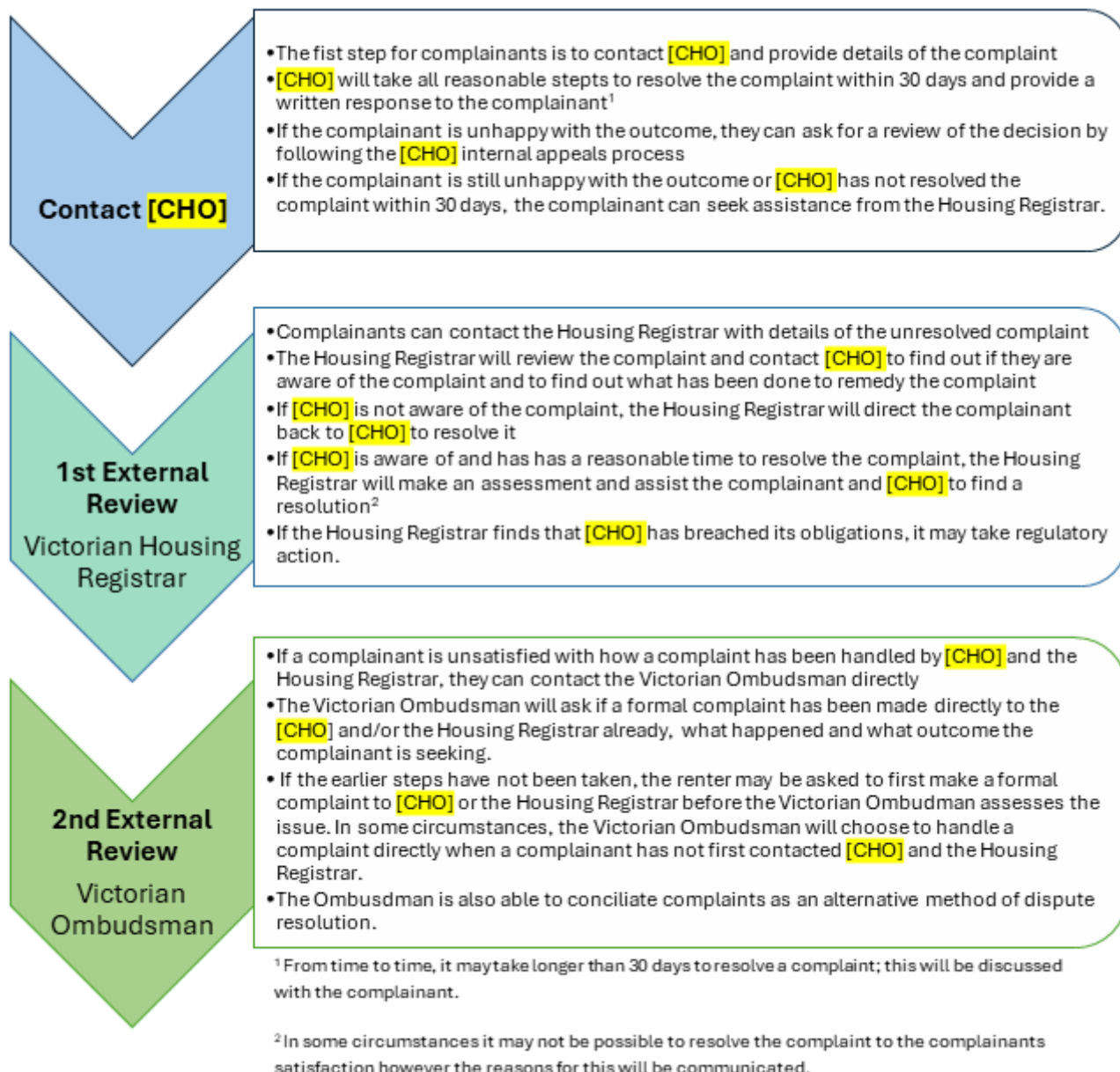


What can I do if I am dissatisfied with the outcome of my complaint?

There may be times where you are dissatisfied with the outcome of your complaint, even after an internal review by [CHO].

The following infographic shows the process for escalating a complaint where you are not satisfied with the process provided by [CHO].





Contact details for dispute bodies

Housing Registrar

If [CHO] has not resolved the complaint within 30 days, or the complainant is unsatisfied by the decision made about the complaint, the complainant may contact the Victorian Housing Registrar:

- Telephone: 03 7005 8984
- Online: [Making a complaint about community housing](#)
- Post: Housing Registrar, GPO Box 4379, Melbourne VIC 3001

Victorian Ombudsman

If a complainant continues to be dissatisfied after discussing an issue with [CHO] and the Housing Registrar, they can contact the Victorian Ombudsman:

- Telephone: 1800 806 314
- Online: [Victorian Ombudsman Complaint form](#)
- Post: Level 2, 570 Bourke Street, Melbourne VIC 3000



Victorian Civil & Administrative Tribunal (VCAT)

A complainant may also have statutory rights of appeal which should be directed to the Victorian Civil and Administrative Tribunal:

- Telephone: 1300 018 228
- Online: [Victorian Civil & Administrative Tribunal](#)
- Email: renting@vcat.vic.gov.au



Appendix D

[CHO logo]

CHIA Vic Template: Feedback & Complaints Form

[Note: This is a template form for community housing organisations that is intended to help meet the obligation to have a complaints procedure as required by section 97 of the Housing Act 1983. It should be tailored to the specific needs of the organisation and linked to your complaints policy. The content of this form can be adapted for online feedback & complaints forms].

Feedback & Complaints Form

Your complaints, comments, suggestions, and compliments are important to us. Please complete this form as fully as possible, explaining why you are dissatisfied or pleased with the service or response you have received. If it's a complaint, please tell us what you would like us to do to put it right. You can view our complaints policy on our website.

Please return this completed form to:

CHO Name

Address

Address

Email

Your details

Date	
Title (Mr/Mrs/Miss etc.)	
First name(s)	
Last name	
Street Address	
Suburb	
Postcode	
Telephone number	
Email address	



Why are you contacting us?

Do you wish to make a:

☐ Complaint	☐ Compliment
☐ Suggestion	☐ Comment

Would you like a reply? ☐Yes ☐No

Which service are you contacting us about?

Please provide your feedback in the box below:

If your feedback is a complaint, what would you like us to do to put things right?



Have you contacted us about this before? ☐ Yes ☐ No

If yes, how did you contact us?

☐ Online	☐ Phone
☐ Email	☐ Letter
☐ Other (please specify):	

Who did you contact (if known)?

--

Demographic Information & Equal Opportunity

We want to make sure that everyone is treated fairly and has equal access to our complaints procedure.

We monitor our complaints to ensure that this is happening. You do not have to fill in this part of the form, but it may help us to improve our services.

If you do not fill in this part of the form, **it will not affect the way we deal with your complaint**. The information you give us is strictly confidential and we will use it for monitoring and statistical purposes only.

Your personal details

Do you identify as:

☐ Male	☐ Female
☐ Another term (please specify):	
☐ Prefer not to say	

Your age?

☐ Under 16	☐ 17-24	☐ 25-44	☐ 45-59
☐ 60-74	☐ 75+	☐ Prefer not to say	



Do you identify as Aboriginal or Torres Strait Islander?

☐ Yes	☐ No	☐ Prefer not to say
------------------------------	-----------------------------	--

I would describe my ethnic origin as:

Please specify:	☐ Prefer not to say
-----------------	--

Language spoken:

Please specify:	☐ Prefer not to say
-----------------	--

Do you require an interpreter?

☐ Yes	☐ No	☐ Prefer not to say
------------------------------	-----------------------------	--

Do you consider yourself to have a disability?

☐ Yes	☐ No	☐ Prefer not to say
------------------------------	-----------------------------	--

If Yes, what type of disability?

Please specify:	☐ Prefer not to say
-----------------	--

