
1. PURPOSE

This Policy outlines how Venture Housing Company (Venture) will handle dissatisfaction with our service. Venture recognises that customers have the right to complain and will not be disadvantaged or penalised for doing so.

This Policy will:

- Make it easy for customers to exercise that right
- Help Venture review what is and what is not working well within our organisation

2. SCOPE

This Policy and its related procedures apply to:

- All customers, current and past
- All customers attempting to access services
- Someone who is responsible for the customer, for example a guardian
- Someone who is the support person or advocate of the customer, as long as written consent has been provided.
- Members of the community who have a direct or indirect legitimate relationship to Venture's services and operations
- Agencies and entities interacting with Venture

3. POLICY STATEMENT

Venture acknowledges that errors, misunderstandings and client dissatisfaction and unexpected problems occurs in all systems and services.

Effective complaint and appeal handling enables organisations to intervene before a problem becomes worse, provide a review process for complaints and appeals by customers who have been disadvantaged by a Venture action or decision and nurture relationships between Venture and our customers. Similarly Venture welcomes positive feedback that compliments its staff on the way they deliver a service as it can be used to promote excellence within the organisation.

Any Venture customer or someone acting on their behalf has the right to lodge a complaint or appeal about services or how they are delivered. Venture is committed to managing complaints and appeals fairly, consistently and efficiently. It will also monitor specific areas of its service delivery by providing opportunities for service users to provide feedback.

4. DEFINITIONS

What is a compliment?

Venture defines a compliment as *an expression of satisfaction with one of its services or with the way the service has been delivered by one or more staff or contractors.*

Examples of a time when you may wish to compliment Venture are:

- Sensitivity in dealing with a change in circumstances
- Prompt handling of correspondence and phone calls
- Efficient processing of responsive repairs
- Approachable and responsive services

What is a complaint?

Venture defines a complaint as *an expression of dissatisfaction with a specific aspect of its services where the complainant is unhappy with the standard or type of service and requests a changed outcome.*

Examples of complaints include:

- Failing to provide a service such as not completing a repair or not conducting a tenant visit
- Rude or inappropriate behaviour such as not returning a phone call
- Poor administration of a service such as not recording changes in circumstances or sending out inappropriate forms
- Providing inconsistent or inaccurate service such as responding differently in different circumstances or providing incorrect advice on Venture policy.

What is an appeal?

Venture defines an appeal as *an expression of dissatisfaction with a decision Venture has made.*

The appeals process provides the opportunity to review the decision and to reflect on whether a decision has been made based on full and accurate information and in accordance with legislation and/or policies and procedures.

5. ROLES AND RESPONSIBILITIES

Venture encourages customers to raise any concerns with the relevant staff member to which it relates before submitting a complaint in writing.

Complaints may be made either verbally or in writing. Venture will attempt to resolve verbal complaints at the time it is made. If the customer is unable to resolve their complaint formally or is not satisfied with the result or response, the complaint should be lodged formally in writing. They should provide detail of their complaint and include any relevant evidence. Once a written complaint is received, Venture will acknowledge the complaint within 7 days.

There are two stages for written complaints:

Stage 1: Manager Review

Once a complaint has been received, the complaint will be passed to the relevant departmental manager to investigate and issue a response. Where it was the relevant departmental manager that made the original decision, the complaint will be referred to another manager or escalated to the next stage.

The investigations and resolution process will take no longer than 28 days. If there is any reason this timeframe cannot be met, Venture will contact the complainant and provide an update.

Stage 2: Chief Executive Officer

If the complainant is not satisfied with the outcome of stage 1, they can escalate their complaint for further review. Details on how to do this will be provided at the time of escalation.

The Chief Executive Officer will initiate a further review and make a determination on the matter. Stage 2 complaints will be turned around within 28 days.

Both stage 1 and stage 2 complaint outcomes will be provided in writing outlining either:

- Complaint Upheld
- Complaint Not Upheld
- Complaint Partially Upheld

The response may include one or more of the following:

- An apology
- An explanation
- An assurance about further and future actions
- Information on proposed changes on operational process

Appeal

If the complainant is dissatisfied with the outcome of their complaint they may request an internal review of the complaint process and/or the decision made.

The request for an appeal of decision is referred by the Chief Executive Officer to the Chair of the Board of Directors.

An appeal involves reviewing the process used to investigate the complaint, and/or the merits of any decision or action taken. As well as considering the overall fairness of the remedy, (to both the complainant and Venture), the standard of performance in the following key areas will be reviewed:

- Accessibility – the availability of the complaint management and investigation process;
- Timeliness - of response, considering the degree of complexity or seriousness of the issue;
- Satisfaction – with the complaint investigation process and the outcomes of the resolution;

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- Effectiveness – of the investigation, response and redress offered, and
 - Compliance – with the complaint management policy and procedures, legislation and funding requirements.

An outcome of a complaint

- Examine all materials in relation to the complaint and investigation;
- Overturn any decision that led to the request for review;
- Compile data about the internal review process for analysis Management.

Vexatious and Unreasonable Complaint Conduct

In a very small number of cases, some complainants behave in ways that are inappropriate and unacceptable, despite our best efforts to resolve the complaint amicably. These complaints may be considered vexatious or unreasonable at any time by Venture staff. Complaints of this nature raise issues relating to health, safety, resource and equity for Venture, our staff, other service providers and the complainant.

These types of complaints can be divided into five categories:

1. Unreasonable persistence – continuous, incessant and relentless conduct often associated with disproportionate views.
2. Unreasonable demands – expressed or implied demands that are considered unreasonable or unable to be met ethically and/or legally.
3. Unreasonable lack of cooperation – unwillingness and/or inability by a complainant to cooperate with Venture, staff and/or our complaints policy and procedure.
4. Unreasonable arguments – arguments that are not based on reason or logic. They are often incomprehensible, false or inflammatory.
5. Unreasonable behaviours – behaviour that is considered unreasonable regardless of how stressed or frustrated the complainant may be.

Once a Venture staff member has established grounds for a vexatious or unreasonable complaint, a formal warning letter will be issued to the complainant. If the vexatious or unreasonable behaviour continues despite the formal warning letter being issued, Venture may limit how we interact with the complainant.

This may include but, is not limited to:

- Limiting contact to a sole contact person/staff member within Venture;
- Restricting the subject matters of complaints that we will consider and/or to which we will respond;
- Limiting the complainant's contact with our office to a particular day, time, length of time or frequency in which they can contact us;
- Limiting the locations where we will meet face to face;
- Limiting the contact that a complainant may have with us.
 - This includes but is not limited to, limiting face to face contact, telephone calls, written communications, and access to our premises as well as contact only through mutually recognised representative only.

COMPLAINTS, COMPLIMENTS AND APPEALS POLICY

POLICY



In very rare cases, and where all other strategies have been exhausted, the Chief Executive Officer may decide to restrict the complainant's access to our services and contact with our organisation. This is an extreme measure and will only be implemented if it becomes apparent that the complainant is not likely to adjust their behaviours and conduct.

Behaviours which may cause restriction of contact and/or services to include but are not limited to:

- Aggressive actions including physical or verbal abuse, threats, intimidation and harassment;
- Malicious damage to property while in office;
- Threats made with a weapon;
- Entrapping a staff member and preventing them from freely moving either in office or off-site;
- Unlawful conduct.

Complaints outside this policy

The NT Civil and Appeals Tribunal (NTCAT) deals with tenants issues arising from Venture's obligations under the Residential Tenancies Act NT and can be contacted on 1800 604 622.

The National Regulatory System for Community Housing (NRSCH) investigates complaints that raise concerns about a registered community housing provider's compliance with the Regulatory Code including the way it is governed and how it manages its assets. A complaint can be made using the online complaint form found at http://www.nrsch.gov.au/complaint_form

Tenant who are NDIS participants and living in Specialist Disability Accommodation (SDA) can make complaint to Venture about their accommodation services provided by Venture or about the services and supports provided by their Supported Independent Living (SIL) provider. Tenants who are not satisfied with Venture response or do not feel comfortable raising the issue, can make a complaint to the NDIS Commission by called 1800 035 544 or via an online form at <https://www.ndiscommission.gov.au/about/complaints>

6. REFERENCES

- Residential Tenancies Act NT 1999
- Community Housing (National Uniform Legislation) Act 2013 (NT)
- National Disability Insurance Scheme Act 2013

7. VERSION CONTROL

Approved by	CEO
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AND APPEALS POLICY
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Version	Date	Author	Changes Made
1.0	27 MAY 2021	EMGR	NEW