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COMPLAINTS, REVIEWS AND APPEALS POLICY

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1 Purpose

The purpose of this policy is to establish a clear and consistent framework for managing customer feedback and appeals at Bethanie Housing Limited (BHL). It outlines BHL's approach to addressing concerns related to the quality and standard of services provided.

Bethanie Housing must ensure that:

- all tenants have the right and opportunity to complain either verbally or in writing, directly or through a third person...
- complaints will be acknowledged, reviewed or investigated and responded to in a timely manner. Feedback is an integral component of the Bethanie Quality Improvement System...
- all tenants are provided with the necessary information to request a review or appeal a decision made by Bethanie Housing, using internal or external review and appeal mechanisms as appropriate.

2 Scope and Applicability

Who must use this policy:	This policy applies to all staff undertaking duties on behalf of Bethanie Housing Limited
Why this policy is important:	Monitor and improve service standards.
When this policy applies:	When tenants, family members or the general public wish to raise issues related to service standards and processes carried out by BHL.
Who to ask for more information:	Your manager Manager of Housing.

3 Definitions

Term	Definition
Appeals	Appeals may only be made in relation to the decision to terminate a tenancy. Appeals will be considered by the CEO or other person duly appointed by the CEO.
Complainant	A client or an advocate acting on behalf of the client or in own capacity in connection with a complaint
Complaint	A formalised expression of dissatisfaction of a client or recognised advocate with the services delivered by Bethanie Housing staff members, residents, contractors, or other third parties working for Bethanie Housing or residents, whether in a specific instance or in general
Recognised advocate	A family member, friend, associate, or representative of a client, complaining on his or her behalf
Resolution	The conclusion of the process of managing a complaint or review, which may be contested, depending on its nature, either at a higher level at Bethanie Housing or at an external authority
Review	A re-assessment of a decision carried out to ensure that the resolution was fair or to correct it if found unfair. A review may relate to a complaint or a tenancy termination decision.



4 Policy

4.1 Objectives

This policy covers all employees of Bethanie Housing dealing with or referred to in a review, complaint or appeal.

4.2 Principles

Principle 1	Bethanie Housing will scrupulously observe its legal and contractual obligations towards tenants.
Principle 2	Bethanie Housing regards the right to complain, request a review or appeal as a fundamental consumer right and welcomes opportunities to improve services.
Principle 3	Bethanie Housing has a zero tolerance for victimisation based on complaints or appeals – all tenants will continue to receive respectful service regardless of any complaints, review requests or appeals lodged.

4.3 Complaints

Preparing and lodging a complaint or review request – Bethanie Housing standards

4.3.1 Accessibility standard

Complaints-related documentation, including the pamphlet in Appendix 2 to this policy, the Bethanie Housing Ethics and Conduct Charter, relevant policies and procedures must be made available to tenants and recognised advocates in paper and electronic format. While the pamphlet (Appendix 2) form is preferred, complaints must be accepted in other forms should the complainant so desire.

4.3.2 Assistance standard

Employees must be prepared to aid any client or advocate wishing to assemble and lodge a complaint, with particular attention given to complainants with a disability and / or limited English language capabilities.

4.3.3 Flexibility of lodgement standard

Complaints must be accepted for submission:

- In person to a Bethanie Housing Manager.
- Dropped in a Suggestion Box available at all Bethanie Sites.
- By fax, post or email sent to the Housing Manager.
- If the complaint relates to a Housing Manager, sent to the Manager of Housing by post or email.
- If the complaint relates to the Manager of Housing, sent to the CEO Bethanie Housing by post or email.
- If the complaint relates to the CEO Bethanie Housing, to the concerned external authority, e.g. Department of Energy, Mines, Industry Regulation and Safety (DEMIRS) and, by way of appeal to the Magistrates Court in case of termination of residential tenancy agreement etc.

4.3.4 Confidentiality standard

As far as possible, the details of any complaint or review must remain confidential amongst staff directly concerned with its resolution. Permission should be



obtained prior to any information being given to other parties which may be desirable to be involved in order to satisfactorily resolve the complaint.

4.3.5 Timeliness standard

The following deadlines must be observed by Bethanie Housing with respect to complaints and reviews management:

Type of Action	Acknowledgment	Time to Solution
Complaint	72 hrs	4 weeks, or 8 weeks with update after 4 weeks*
Review of a Complaint	72 hrs	4 weeks
Review of a Notice of Termination Decision	24 hrs	7 days

If the issue is not resolved in 8 weeks, the complaint or appeal is automatically escalated to CEO level.

4.4 Resolving of a Complaint and Resolution Reviews

- Bethanie Housing will receive, assess and, if required, undertake corrective actions in response to every complaint lodged, in accordance with the standards outlined in Clause 4.3.5.
- Authorities dealing with complaints are the following, depending on the person at the centre of the complaint:

Type of Action	Acknowledgment	Time to Solution	
Staff member or contractor at a Bethanie site	Relevant Housing Manager	Manager of Housing	Court, oversight agency or another external authority
A Housing Manager	Manager of Housing	CEO Bethanie or person appointed by the CEO	Court, oversight agency or another external authority
Manager of Housing	CEO Bethanie or person appointed by the CEO	Court, oversight agency or another external authority	
CEO Bethanie for Bethanie Housing	Court, oversight agency or another external authority		

3. When assessing a complaint, the authority dealing with the complaint will endeavour, in accordance with the Bethanie Group approach to complaints management, to:
 1. Allow time to understand the full extent of the complaint.
 2. Demonstrate understanding of the complaint.
 3. Focus on the issue being raised, not the personality of the individual(s) concerned.
 4. Talk through potential ways of seeking a resolution.
 5. Encourage the complainant to offer suggestions to form a resolution/outline an expected outcome.
 6. Make necessary arrangements to resolve the complaint to the satisfaction of the client/family/others.
4. When reviewing a decision made on a complaint, in accordance with public housing practice the reviewer must establish:
 1. What are the facts of the case.



2. What policy was applied.
3. Was the policy relevant.
4. Was policy correctly applied to the facts.
5. Was the customer situation given comprehensive consideration.
6. Was Bethanie Housing's discretion fairly exercised, having regard to the facts of the case and policy?
5. The form in Appendix 1 must be completed once a complaint has been dealt with.

4.5 Management of Complaints Data

- Once the complaint is closed out, in accordance with the Bethanie Group approach to complaints management, the complainant's level of satisfaction with the complaint's resolution must be evaluated and recorded using the following criteria:
 - Very satisfied with resolution
 - Satisfied with resolution
 - Partly satisfied with resolution
 - Dissatisfied with resolution
 - Very dissatisfied with resolution
 - Not wanting to comment
- Record the complaint resolution satisfaction in Quality Connect with complaints documentation, including the suggestion for resolution captured under Clause 4.4.4(5).
- For the purposes of Bethanie Housing's annual complaints management review, a report will be prepared under coordination by the Manager Housing:
 - Specifying the number and classification of all complaints received during that reporting cycle.
 - listing the results of an in-depth analysis of the systematic, recurring and single incident problems and trends and potentially the identification of underlying causes of complaints.
 - Containing quality indicators such as random sampling of complainants to gauge the level of tenants' satisfaction with the management of complaints.
 - Providing the results of audits of the complaints management function, including recommendations to management regarding the adequacy of the complaints management system and potential improvements to be considered.
 - Recommending a set of complaints-related data and information to be included in the annual report.
 - Analysing internal and external factors likely to impact on the complaints management process (changes in legislation, government policy or community expectations).
 - Submitting to management any other information which may help identify opportunities to improve the efficiency and effectiveness of the Bethanie Housing's complaints handling processes and procedures.

4.6 Reviewing Termination Notices

4.6.1 Notice of Termination of Residential Tenancy Agreement

1. Bethanie Housing may issue a client with a Notice of Termination of the residential tenancy agreement for:



1. A breach of the criteria for assessing eligibility of tenants for social housing premises as established by the Minister for Housing under Division 3 of the Residential Tenancies Act 1987 and published from time to time by the Housing Authority (Department of Communities).. or

2. A breach of the residential tenancy agreement not related to matters identified in Clause 4.6.1.1(1).

2. Consistent with Public Housing practice, every decision leading to a Notice of Termination must be:

- o Issued by the Bethanie Housing Manager.
- o Reviewed by the Manager of Housing before being communicated to the client.

4.6.2 Right of Review of a Notice of Termination of Tenancy Agreement

- A client that has been issued with a Notice of Termination of the residential tenancy agreement has the right to request an internal review.
- The Bethanie Chief Executive Officer will undertake such reviews.
- A client wishing a review may request an opportunity to present his/her case to the reviewer, otherwise the review will be conducted without representation.
- The form in Appendix 1 must also be completed once a review has been undertaken.
- the decision of the Chief Executive Officer is final and open only to external appeal.

4.7 Protection of Whistle Blowers

- o Protections afforded under the Corporations Act 2001
 - Any person making a disclosure under the Corporations Act 2001 will benefit from protection from victimisation in accordance with that Act.
 - Any person making a disclosure under the Aged Care Act 1997 will benefit from protection from victimisation under that Act.
 - Protection against victimisation for whistle blowing will be provided in accordance with the Whistle Blower Policy as modified from time to time

5 Consequences of Policy Breach

- This policy is binding on Bethanie staff, as per Section 2: Scope and Applicability.
- Roles and Responsibilities in relation to this policy are set out in Section 6 below.
- Failure to comply with the policy may constitute a breach of the Bethanie Code of Conduct and business practices.

6 Roles and Responsibilities

Role	Responsibilities
Housing Managers	<ul style="list-style-type: none">• Apply this policy fairly and equitably.
Manager of Housing	<ul style="list-style-type: none">• Ensure this policy is adhered to by relevant staff

7 Related Documents

Legislation
<i>Residential Tenancies Act 1987</i>
Governance frameworks & policies
<i>Corporate Governance Manual</i>



Bethanie Housing Eligibility, Allocation and Rent Setting Policy
Notification Policy
Disruptive Behaviour Policy

8 Document Control

Approved by	Operational Leadership Team	Next Review	November 2025
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Previous Versions	Description of Changes	Position	Date
1.0	Introduced	Manager of Housing	Dec 2021

9 Appendices

Appendix 1:

CHECKLIST - COMPLETION OF A COMPLAINT ASSESSMENT OR REVIEW			
Assessment/review officer: _____			
Complaint number: _____			
STANDARD	COMPLIANCE QUESTION	Yes	No
Accessibility	Is there any evidence that the complainant encountered any difficulty in accessing information necessary to lodge the complaint?		
Assistance	Is there any evidence that the complainant required some assistance in lodging the complaint and did not receive it?		
Flexibility of lodgement	Was the complaint delayed or refused because of the way it was submitted?		
Confidentiality	Were the details of the complaint kept confidential or, if some were released, consent was obtained beforehand?		
Timeliness	Have the deadlines prescribed by the timeliness standard been observed?		
Right of review	Has information on avenues for redress been available, and have review requests facilitated and accepted?		
Procedural fairness	Has the person(s) at the centre of the complaint been provided natural justice rights?		
Representation	Has the complainant been offered the option of being represented by an associated person or advocate?		
Service quality improvement	Has the information related to this complaint been de-identified and made available for service quality improvement purposes?		
_____ Signature of complaint assessment or review officer		_____ Date	

Appendix 2:



ADM F 1.11
Feedback Form (Sep



Appendix 3:

APPEAL AGAINST DECISION TO TERMINATE TENANCY

SECTION 1: TO BE COMPLETED BY THE TENANT	
YOUR CONTACT DETAILS	
<p>Full name: _____</p> <p>Email address and/or daytime phone number: _____</p> <p>Tenancy address: _____</p>	
DECISION TO TERMINATE TENANCY	
<p>Issue date: _____ Issuing officer: _____</p> <p>Specified reason for the decision to terminate tenancy:</p> 	
GROUND(S) FOR APPEAL	

SECTION 2: TO BE COMPLETED BY THE CHIEF OPERATIONS OFFICER - COMMUNITY	
REVIEW OF TERMINATION DECISION AND ASSESSMENT OF PRESENTED GROUNDS FOR APPEAL	
FINAL DECISION	
APPEAL ACCEPTED AND DECISION TO TERMINATE TENANCY REVERTED	
APPEAL REJECTED AND DECISION TO TERMINATE TENANCY UPHELD	
NAME: _____, CHIEF OPERATIONS OFFICER – COMMUNITY	
_____	_____
SIGNATURE	DATE

