

Compass Complaint Management Procedure

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1. Introduction

Compass Housing Services Co. Limited (“Compass”) management of complaints including the gathering of information related to complaints and the way in which we store and log such data are important requirements in meeting our standards under Compass Client Service Charter and our responsibilities under Compass policies.

Compass is committed to providing fair and just review of its services and decisions to tenants, applicants, residents, families, carers, Partners, Workers and other Stakeholders. By ensuring that complaints are addressed effectively, promptly and fairly.

Compass Complaints Management Procedure outlines how we manage, record and resolve complaints.

2. Purpose

The purpose of this procedure is to:

- provide Workers with the framework for the processing and resolution of complaints in a timely, efficient and standardised manner,
- provide Workers with a framework for processing reviews on decisions,
- ensure procedural fairness in the management of complaints and review of decisions,
- identify how Compass track the number and type of complaints received,
- show how we use complaints to learn what we need to do to improve our work and help prevent the recurrence of similar complaint issues through the continuous improvement of Compass’ services.

3. Scope

This procedure is intended to apply to any complaint, regardless of who makes it with the following exceptions which have separate procedures:

- Neighbourhood disputes and difficulties, including accusations of anti-social behaviour, are covered by **Compass Anti-Social Behaviour Policy (POL-025-03)**, **Compass Dealing with Anti-Social Behaviour Procedure (PROC-025-03)**, **Compass Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Policy (POL-025-34)** and **Compass Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Procedures (PROC-025-34)**.
- Complaints and grievances by Compass’ Workers against other Compass Workers are dealt with in **Compass Workplace Relations Policy Manual Complaints and Grievance Policy (POL-028-06)**.
- Complaints involving allegations of fraud, corruption, misconduct and financial wrongdoing are managed in accordance with **Compass Fraud and Corruption Policy (POL-005-04)**,

Compass Financial Wrongdoing Policy (POL-005-06) and Compass Investigation Procedures (PROC-033).

- Complaints received from the Registrar for Community Housing are managed in accordance with **Compass Registrar for Community Housing Complaints Procedure (PROC-012-04)** and recorded in Tickit Compass online system for compliance, incident and risk management.
- Appeals about decisions made by Compass are dealt with in **Compass Internal Review and Appeal Policy and Procedure (POL-001)**.

Anonymous complaints can be lodged, recorded and investigated, but obviously our ability to investigate and act on them may be limited because of this.

The process for handling child complaints may be generally managed in accordance with this procedure however refer to **Compass Child Safeguarding Policy (POL-003-02)**, **Compass Child Friendly Complaint Handling Guidelines (PROC-012-02)** and **Compass Child Abuse Reporting Procedure (PROC-012-04)** for additional requirements for managing child complaints.

The process for handling complaints from people with disability, families, carers, service providers may be generally managed in accordance with this procedure however refer to **Compass Safeguarding People with A Disability Policy (POL-003-03)** and **Compass Safeguarding People with A Disability Complaint Handling Guidelines (PROC-012-03)** for additional requirements for managing child complaints.

4. Context

4.1. Complaint

A complaint is where a tenant, applicant, resident, Partner, member of the community or other stakeholder expresses dissatisfaction with an area of service delivery, over which Compass has direct control.

A complaint may be made by a person to whom we deliver services or who is affected by our services which relates to our Workers, Partners, Associates and anyone else acting on behalf of a member of the Compass Group.

4.2. Neighbourhood Disputes and Anti-Social Behaviour

This procedure does not apply to areas that Compass does not have direct control over, including but not restricted to:

- Neighbour disputes
- Accusations of disruptive behaviour
- Reports of criminal behaviour
- Noise and nuisance

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- Domestic violence

Refer to **Compass Anti-Social Behaviour Policy (POL-025-03)** and **Compass Dealing with Anti-Social Behaviour Procedure (PROC-025-03)** for information about managing anti-social behaviour.

Refer to **Compass Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Policy (POL-025-34)** and **Compass Neighbour Disputes & Nuisance and Annoyance, Pets & Cleanliness Procedures (PROC-025-34)**.

4.3. Ministerial Complaint

Complaints which are made directly to Compass by way of Ministerial correspondence or contact are dealt with in the same way as other complaints covered by these procedures. However, these complaints are responded to and appropriately actioned within 24 hours from the time a request for information by the Minister is received by Compass. A ministerial complaint would be received, acknowledged and recorded in Greentree using a **Complaint Service Request / Problem Code: LocalMP**.

4.4. Registrar for Community Housing Complaint

From time to time the Registrar may receive complaints and allegations relating to dissatisfaction with Compass compliance with the Community Housing Providers National Law and National Regulatory Code.

These complaints are acknowledged, investigated and responded to by the Group Chief Governance Officer as delegated by the Group Managing Director. When a complaint from the Registrar is received it is lodged in Tickit Compass online system for compliance, incident and risk management.

Refer to **Compass Registrar for Community Housing Complaints Handling Procedure (PROC-012-05)**.

4.5. Privacy Complaint

A person may make a complaint if they feel their personal information has been handled inappropriately by Compass, refer **Compass Privacy Policy (POL-019)**. Privacy complaints are managed in accordance with Compass Complaints Management and this procedure. If a complainant is not satisfied with Compass response or the way Compass has dealt with the complaint, the individual may make a formal written complaint to the Office of the Australian Information Commissioner (OAIC).

Where there has been a notifiable data breach an incident report will be lodged via Tickit Compass online compliance, incident and risk management system in accordance with **Compass Privacy or Notifiable Data Breach Procedure (PROC-019-01)**.

4.6. Complaints including allegations of fraud, corruption or misconduct

The Group Chief Governance Officer is appointed as the Compass Fraud Officer.

Complaints including allegations of fraud, corruption or misconduct are required to be lodged via an incident form in Tickit and referred to the Group Chief Governance Officer for triage and action in accordance with **Compass Fraud and Corruption Policy (POL-005-04)**, **Investigation Procedures (PROC-033)**. The person responsible for managing the complaint is responsible for lodging the incident form.

If the complaint is from an Eligible Whistleblower refer to **Compass Whistleblower Policy (POL-005-03)** for whistleblower protections and provisions that apply to the complaint investigation.

4.7. Complaint regarding breach of ACFID Code of Conduct

Compass is committed to adhering to the ACFID Code of Conduct. If a person has reasonable grounds to believe there has been a breach of the Code, they may make a complaint about to ACFID. Complaints against a member may be initiated by any member of the public, other ACFID members, and any other body. The independent Code of Conduct Committee (the Committee) is responsible for investigating complaints. The process through which complaints are investigated and findings determined is outlined in ACFID Code of Conduct Complaints Handling. Click on the following link for further information <https://acfid.asn.au/content/complaints>.

4.8. Contact for complaints

Any person in Australia or from countries where work is being conducted by Compass representative, may raise concerns or complaints about Compass discretely and confidentially.

Complaints about Compass workers, associates and partners carrying out business on behalf of Compass should be marked confidential and can be made by email to the Complaints and Customer Service Officer, complaints@compasshousing.org

or posted to Compass Complaints and Customer Service Officer, P O Box 976, Hamilton NSW 2303.

The complainant will receive an acknowledgement letter. If you have any queries or would like information about your complaint progress or Compass complaints process may contact Compass by telephone on 1300 333 733 and request to speak to the Compass Complaints and Customer Service Officer.

5. Procedure

Compass is committed to tenants', applicants', members of the community or other stakeholders' rights and will provide an effective complaints procedure that benefits the tenant, applicant, member of the community or other stakeholder and Compass in the long term, by providing a process for feedback and

review that informs effective decision making for service improvement. Compass has written documentation that demonstrates a clear commitment to:

- the rights of tenants to respectful, fair and non-discriminatory treatment
- the provision of safe and secure housing
- privacy
- protecting personal information, and
- providing access to complaints and appeals processes

The following information outlines the procedure to guide Compass Worker's in managing a complaint.

There are five phases involved in managing a complaint:

1. Receive and Document / Record
2. Assess and Prioritise
3. Investigate and Action
4. Outcomes and System Improvement
5. Monitoring Effectiveness and Reporting

5.1. Receive and Document / Record

The primary function of receiving and documenting / recording a complaint is to ensure that the complainant receives acknowledgement that their complaint is being addressed and it is recorded in Greentree for further action.

Greentree is the primary tool for the electronic collection of data in relation to complaints. Employees are required to record complaint details within Greentree in accordance with the Greentree Procedures Manual – Complaint Service Requests. The record created is a **Complaint Service Request (SR)**.

- i. **Available mediums to lodge a complaint:** A complaint can be lodged with Compass via any mode of communication, such as in person, telephone, writing, fax, email or via the website. If the complainant requires assistance to lodge a complaint, every possible effort should be made to organise an interpreter, translator, advocate or support service to assist.
- ii. **Receiving a complaint:** When receiving a complaint, it is important that the complainant feels heard and their complaint is acknowledged and not trivialised. Effective management of a complaint in the initial stages may prevent a complaint escalating.
- iii. **Acknowledging a complaint:** Should a complaint be received via writing, fax, email or website, the complainant should be contacted, and their complaint acknowledged in writing (when there is an address provided). Should the complaint be received in person or over the phone, immediate acknowledgement will be provided. The complaint will be lodged and documented in Greentree and a receipt number will be generated. This

- number is to be issued as an acknowledgement and to reassure the complainant that investigation and appropriate action will be taken.
- iv. **Documenting a complaint:** All complaints are to be documented in Compass' Greentree system via a Service Request. It is important to inform the complainant that information will be recorded and documented so the complaint can be dealt with in the most effective way.
 - v. **Privacy and personal information:** When collecting personal information, an employee must provide the Privacy Notice to the complainant and any other person that may be requested to provide personal information while investigating the complaint. The privacy notice must be given to the complainant if practicable, before the collection of the personal information, or as soon as practicable after the collection. Complainants may access, change or update any personal information Compass holds about them, subject to the Privacy Act 1988 (Cth).
 - vi. **Confidentiality:** Confidentiality will always be respected and maintained within the constraints of the need to fully investigate a complaint, subject to any legal authorisation or requirements for disclosure and consistent with the principles of natural justice.

Compass will accept anonymous complaints and investigate these as practically possible. They may be lodged in writing or accepted as an oral statement. Complainants will be encouraged to provide as much information as possible. Anonymous complaints will be treated with the same priority as other complaints.

When communicating with a complainant, it is important to collect as much information as possible, including:

- the complainant's name, address and best contact number
- identifying whether they are a Compass tenant, resident, applicant or a member of the community
- the basis of their complaint; ask for dates, time and place of any associated events
- if the complaint is about a Worker, ask for the Worker's name; if they are not able to provide this information, ask for a description of the Worker and what service was being provided at the time
- the name and, if possible, contact details of any witnesses
- how the incident has affected the person
- any further information or evidence that supports the complaint and will assist in the assessment and resolution process, and
- any relevant documentation relating to the complaint should be scanned and attached to the Complaint Service Request.

5.2. Assess and Prioritise

On raising a Complaint Service Request, a priority status needs to be applied to the complaint for it to be processed appropriately. Determination of this status is based on what level of management is required

to resolve the complaint. Compass Workers are empowered to resolve issues where possible at first point of contact.

Priority definitions and examples are provided in the table below:

Low priority Complaint	Moderate priority Complaint	High priority Complaint
<ul style="list-style-type: none"> • May relate to a single issue; • Involves minimal risk to the complainant, department or engaged service provider; • Will require a formal investigation; and • Will be suitable for local resolution. <p>Low priority complaints would usually be handled by an Executive Manager, or delegate. The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</p>	<ul style="list-style-type: none"> • May relate to one or more issues; • Involves a reasonable degree of risk to the complainant, organisation or engaged service provider; • Will involve a more detailed investigation; and, • Should involve consultation as to whether it will be suitable for local resolution. <p>Moderate priority complaints would usually be handled by an Executive Manager, or delegate. The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</p>	<ul style="list-style-type: none"> • May involve a serious or significant risk to the complainant, organisation or engaged service provider; • Will involve a formal investigation; and, • Is not suitable for local resolution. <p>High priority complaints must be handled by an Executive Manager, or delegate. The senior officer may assign the investigation to an appropriate officer; however, the senior officer must sign off on the outcome of the complaint.</p>

5.3. Investigate and action

5.3.1. Investigating

Compass may undertake various methods to gather information to substantiate a complaint.

The investigation process must be objective, reasonable and conducted in good faith. Decisions must be made on the weight of evidence and on the balance of probabilities. Investigating a complaint may include:

- clarifying the details provided in a complaint
- identifying actions taken to resolve the issue before the complaint was lodged
- gathering and analysing information from relevant file notes, correspondence and/or other sources
- reviewing applications submitted by the complainant
- reviewing documentation submitted by the complainant
- reviewing previous administrative decisions or actions
- interviewing complainants, Workers and/or other individuals involved in the complaint
- reviewing relevant policies, procedures and/or legislation, and
- reviewing previous complaints about the same issue.

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Records of each investigation should contain all correspondence; including file notes of telephone conversations, interviews, and findings from investigations, recommendations and internal approvals. The file should also contain evidence of the steps taken to investigate the complaint including a summary of actions in respect of recommendations (if any) made.

All information will be gathered and recorded in Greentree against the Complaint Service Request. Any relevant documentation / evidence that has been gathered should be scanned and attached to the Complaint Service Request. This process will assist should the complaint need to undergo an Internal Review.

It should be recognised that complex matters may require a more detailed, structured investigation to be conducted and this should be communicated to the relevant parties.

5.3.2. Actions Taken to Address a Complaint

Following completion of the investigation into the complaint, the investigation findings are to be recorded and a written response to the complainant forwarded by the assigned user (in Greentree), including the reason/s for the decision and the steps taken to investigate the complaint should always be included.

The resolution of a complaint should include:

- Acknowledgement – of how the complainant has been affected and their expectations of a quality service
- Apology – for some people, a genuine apology may be all or part of what is sought
- Answers – an explanation of what happened or the provision of information that may be needed to address the complainant's concerns
- Action – agreements on steps to address the concern and improve services.

If the complaint has been found to be substantiated or partially substantiated, details of remedial actions to be taken should be provided to the complainant in the written response. If the complaint is unsubstantiated, the reason for this decision must be provided to the complainant in writing.

The response letter must be generated by the Assigned User from Greentree using the letter templates provided. The response letter needs to be attached to the Complaints Service Request. The Complaint Service Request status can now be changed to *Closing of Complaint*.

Where possible the complainant should also be advised of the resolution via telephone. Telephone contact however does not eliminate the requirement to provide a written response (via post or email).

5.3.3. Response Times

Complaints will be investigated as quickly as possible. Complaints that relate to a simple matter should be finalised within seven days and a maximum of 30 days.

Compass acknowledges that some complaints may require a more detailed investigation and, therefore, will result in more extended time for resolving the complaint. In these circumstances, the extended time for resolving the complaint will be communicated to the complainant.

Ministerial Complaints - Complaints which are made directly to Compass by way of Ministerial correspondence or contact must be responded to and appropriately actioned within **24 hours** from the time a request for information by the Minister is received by Compass. A ministerial complaint coming from the Minister will be deemed received on the date the Minister forwards the complaint to Compass.

Privacy and Confidentiality - Any complaint that is made about a privacy issue will be completed within 60 days.

5.3.4. Finalisation

The Executive Manager will review the outcome of the complaint before changing the status of the Complaint Service Request to c5. Closing of Complaint File. They will then select a Closure Reason and attach a draft Closure Letter. During the review process, consideration should be given to what remedy and systems improvement may be required.

Complainants must receive written acknowledgement and advice about the resolution of their complaint within required timeframes (see Response Times above).

The response must include information about further steps they can take if they are dissatisfied with the resolution of a complaint such as referral to the:

Consumer and Commercial Division of the NSW Civil and Administrative Tribunal (NCAT) for disputes relating to Residential Tenancy Agreements

NSW Family and Community Services Housing Appeals Committee (HAC) where the matter is an appealable decision as defined by HAC.

Registrar for Community Housing where the complaint is in relation to compliance as a registered community housing provider

Ombudsman for complaints about Privacy complaints

Quality and Safeguarding Commission for complaints related to NDIS and SDA

5.3.5. Outcomes and System Improvement

When developing system improvement recommendations, consideration should be given to the extent the action will:

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- prevent the recurrence of similar complaints
- improve service delivery

System improvements can include:

- policy and procedure change
- practice review, and
- Worker training and other professional development activity may also be recommended.

Remedial action that may be appropriate and reasonable to remedy errors and deficiencies in service include (for example):

- an explanation
- a change in decision
- formal or informal dispute resolution
- an apology, and/or
- written warning letter or notice to remedy breach, and
- correction of any misleading or incorrect records.

Executive Managers are to take into consideration the complaint monitoring reports and are responsible for investigating the validity and applicability of the recommendations made by the Complaints Officer in informing corrective actions or continuous improvement strategies.

5.3.6. Monitoring Effectiveness and Reporting

Recording of complaints information allows identification of any trends or system issues to inform improvements to the services we provide.

The reporting function is performed by the Complaints Officer, Corporate Services.

Quarterly analysis of complaints data to identify and address any systemic issues, including improvements to products and services, policies and procedures and Worker training needs, will be undertaken by the Complaints Team Corporate Services.

Based on the quarterly analysis, the Complaints Officer, Corporate Services prepares a report which includes:

- the number, level, category and outcomes of complaints received,
- the time taken to resolve complaints and the number of complaints that were not resolved within the required timeframe, and
- complaint issues and trends for continuous improvement opportunities

6. Complaint Management Responsibilities

Role	Responsibilities
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<p>Group Executive and Executive Management</p>	<p>Group Executive and Executive Management are responsible for the following;</p> <ul style="list-style-type: none"> • Ensuring that the complaints management process and objectives are established within Compass; • Ensuring that the complaints management process is planned, designed, implemented, maintained and continually improved in accordance with the complaints management policy of the organisation; • Identifying and allocating the management resources needed for an effective and efficient complaints management process; • Ensuring the promotion of awareness of the complaint’s management process and the need for a customer focus through Compass; • Ensuring that information about the complaint’s management process is communicated to customers, complainants, and, where applicable, other parties directly concerned in an easily accessible manner; • Appointing a complaints management representative and clearly defining his or her responsibilities and authority in addition to the responsibilities and authority set out below; • Ensuring that there is a process for rapid and effective notification to top management of any significant complaints; • Periodically reviewing the complaints management process to ensure that it is effectively and efficiently maintained and continually improved.
<p>Complaints Officer Corporate Services</p>	<p>The complaints officer is responsible for the following:</p> <ul style="list-style-type: none"> • Establishing a process of performance monitoring, evaluation and reporting; • Reporting to top management on the complaint’s management process, with recommendations for improvement; • Maintaining the effective and efficient operation of the complaint’s management process, including the training of appropriate personnel, technology requirements, documentation, setting and meeting target time limits and other requirements, and process reviews.
<p>Other managers</p>	<p>Other managers involved in the complaint’s management process should, as applicable within their area of responsibility, be responsible for the following:</p> <ul style="list-style-type: none"> • Ensuring that the complaints management process is implemented; • Liaising with the complaint’s management representative; • Ensuring the promotion of awareness of the complaint’s management process and of the need for a customer focus; • Ensuring that information about the complaint’s management process is easily accessible; • Reporting on actions and decisions with respect to complaints handling; • Ensuring that monitoring of the complaint’s management process is undertaken and recorded; • Ensuring that action is taken to correct a problem, prevent it happening in the future, and that the event is recorded; • Ensuring that complaints management data are available for the executive management review.

<p>Frontline Workers</p>	<p>All Workers in contact with clients and complainants are to:</p> <ul style="list-style-type: none"> • Be able to take a client or stakeholder complaint; • Comply with any complaints management reporting requirements determined by Compass; • Treat clients and stakeholders in a courteous manner and promptly respond to their complaints or direct them to the appropriate individual, and; • Show good interpersonal and good communication skills.
<p>All Workers</p>	<p>Be aware of their roles, responsibilities and authorities in respect of complaints;</p> <ul style="list-style-type: none"> • Be able to record a complaint or enquiry in accordance with Compass policies and procedures; • Be aware of what procedures to follow and what information to give to complainants, and; • Report complaints which have a significant impact on the organisation.

7. Responsibilities

All Compass workers have an obligation to:

- familiarise themselves with and ensure they have a clear understanding of Compass policies and procedures,
- observe and implement such policies, and associated procedures in delivering services to Compass clients,
- inform Compass clients of the impact of this procedure on them and assist them to understand their rights and obligations, as required,
- identify issues that require amendment to this procedure document and complete the relevant documentation to propose any amendments, and
- report breaches of Compass policies or procedures.

The relevant Group Executive Manager is ultimately responsible to:

- ensure all stakeholders within their area of responsibility are informed about Compass Policies and Procedures,
- ensure appropriate processes and controls are implemented to enable the correct application of and adherence to relevant policies and procedures, and
- ensure appropriate processes and controls are implemented to enable breaches of approved Compass Policy and Procedures to be reported and managed.

8. Document Control

This procedure is part of Compass approved policies and procedures register.

Policies and procedures on the register are reviewed regularly and revised where warranted.

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The Group Chief Governance officer is ultimately responsible for the control and review of policy and procedure documents in accordance with **Compass' Group Documentation Structure and Quality Assurance ("QA") Management Guidelines (GUI-018)**.

Refer to **Compass Policy and Procedure Development Approval and Review Procedure (PROC-011)** for information on the document review process.

9. Records

All records relevant to these procedures are to be maintained in a recognised Compass recordkeeping system in accordance with Compass Records Management Policy.

10. Definitions

Term	Definition
Associate	An "associate" of a regulated entity includes directors and company secretaries of the regulated entity and its related bodies corporate and may also include a range of individuals within whom the regulated entity acts in concert or is otherwise associated in a formal or informal way. These include visitors to our programs (including media), advisory group members, interns, supporters (donors, sponsors, advocates, ambassadors), trustees, members, staff in consulting and partnership agencies, and any other individuals or groups that have been brought in contact with children (including their personal information and images) while working with and / or supporting Compass.
Antisocial Behaviour	Is when a person's behaviour affects another person's peace, comfort or privacy. It can encompass a range of activities or actions such as intoxication, loitering and general nuisance behaviour that interferes with other people/person.
Client	A customer, tenant or applicant. A person or group that uses the professional advice or services of a lawyer, accountant, advertising agency, architect, etc. A person who is receiving the benefits, services, etc., of a social welfare agency, a government bureau, etc.
Compass	Compass Housing Services Co. Ltd
Compass Group	The corporate structure that includes Compass (as the Parent Company) and the boards of Subsidiary Companies, Governance Committees and advisory groups as created from time to time.
Complaint	An expression of dissatisfaction made to Compass about the quality of our services or decisions made in delivering these services or the complaints management process itself, where a response or resolution is explicitly or implicitly expected.

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Enquiry	An enquiry refers to a client’s request for information related to the services or the request for assistance of services which Compass provides. An enquiry can be received by phone, postal mail, fax or other electronic transmission.
Neighbour Dispute	Involves 2 or more neighbours that disagree on issues such as behaviour of tenants, noise, fences, trees, car parking, visitors or pets.
Partners	individuals, groups of people or organisations that collaborate with ACFID Members to achieve mutually agreed objectives in development and humanitarian initiatives. This may include affiliates. ¹
Partnership	An ongoing working relationship where risks and benefits are shared (Partnership Brokers Association) ¹
Risk	Involves the probability of minimal / reasonable / serious or significant damage or liability to the complainant, department or engaged service provider.
Service Request (SR)	A <u>service request</u> is a service ‘ticket’ that enables a request for service to be reliably submitted, processed, approved, monitored and delivered.
Service Request Management (SRM)	Is the process of managing a service request through its lifecycle from submission through delivery and follow-up. As set up in Greentree, a user contacts a help desk to request a service and help desk personnel create a service ticket to assign the service request to the appropriate team. These systems also typically enable users to track the status of their service requests, and management to monitor service delivery levels for quality control purposes.
Worker (Compass)	has the same meaning as defined in the NSW Work Health and Safety Act 2011 No 10 Subdivision 2 Part 7 Meaning of ‘worker’ (1) A person is a worker if the person carries out work in any capacity for a person conducting a business or undertaking, including work as: <ul style="list-style-type: none"> • an employee, or • a contractor or subcontractor, or • an employee of a contractor or subcontractor, or • an employee of a labour hire company who has been assigned to work in the person’s business or undertaking, or • an outworker, or • an apprentice or trainee, or • a student gaining work experience, or • a volunteer, or • a person of a prescribed class.
Worker (Compass QLD)	is 'a person who works under a contract and, in relation to the work, is an employee for the purpose of assessment for PAYG withholding under the Taxation Administration Act 1953 (Cwlth), schedule 1, part 2-5'. This applies to a person for whom PAYG tax instalments are required or would be required to be withheld by their employer.

¹ Definition adopted from ACFID general definitions provided to clarify the use of key terms with reference to the ACFID Code of Conduct, June 2019, <https://acfid.asn.au/content/general-definitions>

11. Document Information

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Last reviewed date:	27/06/2019
Current version approval date:	27/06/2019
Next review no later than	30/06/2022

12. Resources and related documents

The following related documents are referenced this procedure:

- Compass Internal Review and Appeal Policy (POL-001)
- Compass Child Safeguarding Policy (POL-003-02)
- Compass Safeguarding People with Disability Policy (POL-003-03)
- Compass Whistleblower Policy (POL-005-03)
- Compass Fraud and Corruption Policy (POL-005-04)
- Compass Complaints Policy (POL-012)
- Compass Privacy Policy (POL-019)
- Compass Anti-Social Behaviour Policy (POL-025-03)
- Compass Neighbour Disputes and Annoyance, Pets & Cleanliness Policy (POL-025-34)
- Compass Workplace Relations Manual Complaint and Grievance Policy (POL-028-06)
- Records Management Policy (POL-035)
- Records Management Policy Schedule (POL-035-01)
- Internal Review and Appeal Management Procedures (PROC-001)
- Compass Safeguarding People with Disability Procedure (PROC-003-03)
- Compass Policy and Procedure Development Approval and Review Procedure (PROC-011)
- Compass Child Friendly Complaint Handling Guidelines (PROC-012-02)
- Safeguarding People with A Disability Complaint Handling Guidelines (PROC-012-03)
- Compass Child Abuse Reporting Procedure (PROC-012-04)
- Compass Registrar for Community Housing Complaints Handling Procedure (PROC-012-05)
- Compass Privacy or Notifiable Data Breach Procedure (PROC-019-1).

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- Compass Dealing with Anti-Social Behaviour Procedure (PROC-025-03)
- Compass Neighbour Disputes and Annoyance, Pets & Cleanliness Policy (PROC-025-34)
- Compass Investigation Procedures (PROC-033)
- Compass' Group Documentation Structure and Quality Assurance ("QA") Management Guidelines (GUI-018)
- Complaint form / Online complaint enquiry form

13. Version Administration

Version	Date	Status and Changes	Author
1.0 Working Draft	2014-03-27	Approved as Working Draft by CEO and released	L. Balcombe
V1.0	2014-06-03	Adopted and distributed	L. Balcombe
V2.0	2015-06-30	Review	L. Balcombe
V3.0	2017-06-30	Review	M Faithfull
V4.0	2018-06-30	Review	C Phoenix
V5.0	28/03/2019	Review for consistency with ACFID membership requirements and NDIS / SDA requirements	C Phoenix, Quality and Compliance Administrator J Barnett, Group Chief Governance Officer J McLain, Complaints Officer
	12/05/2019	Approved and distributed	Greg Budworth, Group Managing Director
V6.0	27/06/2019	Further review to include identified gap from ACFID feedback	J Barnett, Group Chief Governance Officer
		Approved for distribution	Greg Budworth, Group Managing Director

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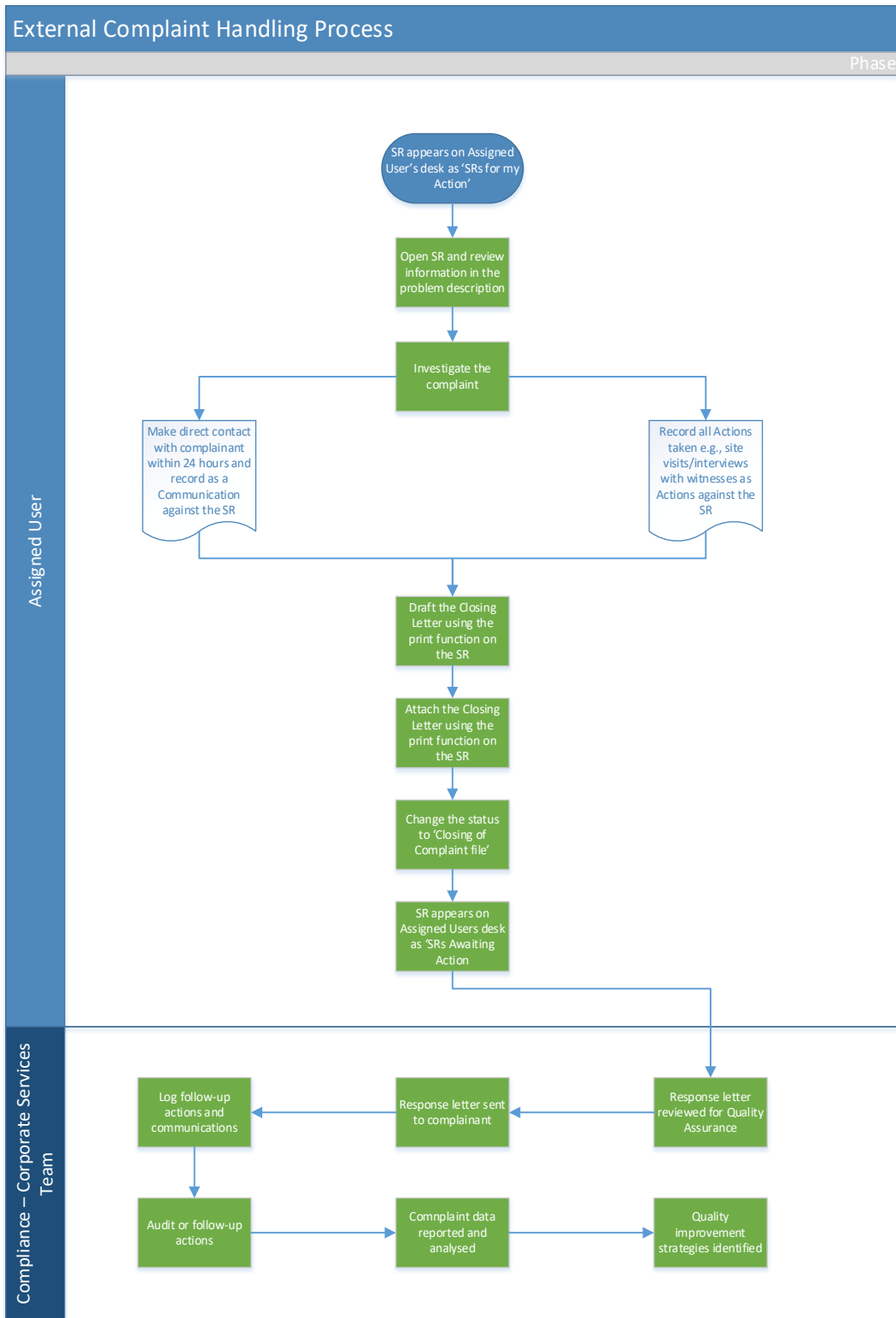
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Appendix 1: Complaint Types

Category	Complaints	Not classified as complaints
3 RD Party	<p>Correspondences received from an external third-party body or organisation regarding representations on behalf of a tenant, applicant or landlord e.g.,</p> <p>Registrar of Community Housing Tenancy Advocacy Groups Anti-Discrimination Board Solicitors</p> <p>*Only when Compass has received written authority from the tenant for a 3rd Party to act on their behalf will the details of their tenancy be disclosed. A standard receipt letter is issued where no authority has been given.</p>	
Contractors	<p>Complaints specific to external contractors and their interaction with Compass tenants regarding:</p> <ul style="list-style-type: none"> • Quoting • Conduct • Behaviour • Incomplete or substandard work • 	<ul style="list-style-type: none"> • Requests to do work in non-common areas
Anti-Social Behaviour / Neighbour Disputes	<p>Antisocial behaviour/ neighbour disputes are recorded in Greentree under Complaints Service Requests. As these are often areas that Compass does not have direct control over, they are also covered under the Dealing with Anti-Social Behaviour Policy. See Antisocial Behaviour Policy/Procedure.</p> <p>Antisocial behaviour/ neighbour disputes include:</p> <ul style="list-style-type: none"> • Excessive and persistent noise i.e. loud music, constant banging or loud noise. (not one-off incidents) • Persistent loud or unruly behaviour <p>Loitering</p>	<ul style="list-style-type: none"> • Continual neighbour disputes (these should be referred to CJC) • Vandalism (police) • Verbal abuse (police) • Illegal activity i.e. drug use or distribution (police) • Serious harassment / stalking (police) • Threats (police), or • Physical assaults or acts of violence (police)
Local MP	Letters from local MPs on behalf of tenants	

Category	Complaints	Not classified as complaints
	<p>*Third party consent is automatically granted by the tenant by engaging representation of the local MP on his/her behalf to share information relating to the tenancy.</p> <p>Complaints which are made via ministerial correspondence will be dealt with in the same way as other complaints.</p>	
Maintenance	Complaints regarding the service delivery specific to maintenance of assets and quality of repairs undertaken. Timeframe to complete lodged service request (must be already logged but not communicated or actioned)	Maintenance that has not been completed where there is no previous SR raised.
Marketing, Comms, Events	<p>Includes:</p> <ul style="list-style-type: none"> • Any correspondence including tenant newsletters (must be a legitimate complaint about offensive content) • Dissatisfaction with the type of events held, • Inclusion or exclusion from Compass held events, • Photos or articles of tenants used or published without prior permission • Political bias 	Personal feeling or opinions about the content of correspondence
Privacy/Confidentiality	Where a tenant feels we have breached their privacy and disclosed confidential information or accessed their confidential information without permission	Complaints regarding authorised access to information or requests for a specific Worker to access information due to a personal grudge.
Service Delivery	An expression of dissatisfaction made to Compass related to its products or services (including those delivered by contracted providers), where a response is expected	Personal grudges against a Worker.

Appendix 2: Complaint Handling Process



End of document

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