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COMPLAINTS MANAGEMENT POLICY

POLICY TYPE	Group Governance Policy
APPLICABILITY	**Company** EchoRealty NSW & ACT Limited
POLICY REFERENCE	GRC001 ER
POLICY OWNER	Group General Manager Growth, Governance, Legal & CoSec
APPROVED BY	EchoRealty NSW & ACT Limited Board of Directors
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TABLE OF CONTENTS

1. Purpose **3**

2. SCOPE **3**

3. POLICY STATEMENT **3**

4. GUIDING PRINCIPLES **3**

5. COMPLAINTS OFFICER ROLE **4**

6. COMPLAINTS MANAGEMENT STAGES **5**

6.1 Receipt of Complaint 5

6.2 Frontline Staff Complaint Handling 5

6.3 Formal Complaints Management 5

6.4 Assessment of Complaint 5

6.5 Response to Complaint 6

6.6 Complaints Management Process Map 6

7. EXTERNAL COMPLAINT BODIES **7**

8. ANONYMOUS COMPLAINTS **8**

9. SOCIAL MEDIA COMPLAINTS **8**

10. AUTHORITY, EDUCATION AND TRAINING **8**

11. RECORDING – COMPLAINTS MANAGEMENT REGISTER **8**

12. CONFIDENTIALITY **8**

13. REVIEW AND AUDIT OF COMPLAINTS MANAGEMENT **9**

14. REPORTING OF COMPLAINTS **9**

15. Defined Terms **9**

COMPLAINTS MANAGEMENT POLICY

1. PURPOSE

This Policy outlines the approach of EchoRealty NSW & ACT Limited ("EchoRealty") to the management of formal Complaints and ensures a consistent and systematic methodology to managing and monitoring Complaints received by the Complaints Officer. It further serves to highlight the importance of client satisfaction to our organisation.

2. SCOPE

This Policy applies to EchoRealty.

For the purpose of this Policy, Complaints are defined as:

An expression of dissatisfaction with the standard or type of service provided by EchoRealty, which is made by an external person or organisation (complainant), and where the complainant had expected or is requesting a different outcome or result.

This Policy DOES NOT apply to the following:

- Complaints received and handled by Frontline Staff that have not been escalated (by either the Complainant or Frontline Staff) to the Complaints Officer;
- Decisions covered by the Appeals Policy;
- Complaints relating to a Neighbour Dispute;
- Standard service enquiries or requests to EchoRealty for information, approval or action;
- Feedback including opinions and comments which do not require a response;
- Issues that fall outside the jurisdiction of EchoRealty such as matters for other agencies including Centrelink, Child Protection Agency and NSW Police;
- Complaints between an EchoRealty resident and external contractor not engaged by EchoRealty; and
- Matters which have already been escalated to another forum such as a Court or NSW Civil and Administrative Tribunal (NCAT).

3. POLICY STATEMENT

EchoRealty aims to resolve Complaints as effectively and efficiently as possible, by ensuring the process is visible, accessible, responsive, objective, and evidence based. This includes addressing any cultural, linguistic, physical or intellectual needs of the Complainant or their advocate. We value Complaints as they assist us to improve our services.

4. GUIDING PRINCIPLES

The following guiding principles are to be used to manage Complaints.

Visibility and Accessibility

The Complaints Management Process is to be highly visible and promoted through a range of mediums. Information on the Complaints process is to be:

- easily available;
- easy to find;
- easy to understand;

- easy to use; and
- available in different formats.

Responsiveness

Complaints are to be acknowledged and Complainants kept informed of progress within Policy timeframes. If, for any reason, this is not possible Complainants are to be notified of any delay by telephone and/or in writing.

Our responsiveness is dependent on:

- the health, safety and security of our staff, and
- our ability to allocate our resources fairly across all the Complaints we receive.

When a Complainant behaves unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. We will endeavour to be proactive and decisive in managing any conduct that negatively and unreasonably affects us and will support our employees in doing the same.

Objectivity

Complaints are to be dealt with in an unbiased manner by ensuring:

- openness – the process must be clear;
- impartiality – the process must be fair, treated as legitimate and investigated without prejudice;
- equitability – equal access and treatment are to be given to all people involved; and
- sensitivity – due care is to be given to individual differences and needs.

Evidence based

Facts and data are to be used to establish the relevant details of the situation. Decisions and recommendations regarding a resolution to a Complaint must be based on sound evidence collected from a thorough investigation of the Complaint.

5. COMPLAINTS OFFICER ROLE

The Complaints Officer is designated by EchoRealty to oversee the Complaints Management Process. The Complaints Officer does not investigate or resolve the Complaint; they will however conduct an initial assessment of the Complaint and appoint an Investigating Officer.

Following receipt of advice from the Investigating Officer, and any other interested parties, the Complaints Officer will prepare a response to the Complainant on behalf of EchoRealty.

The Complaints Officer is also responsible for the accurate recording of each Complaint and for the management of the Complaints Register. The Complaints Officer will undertake their work on an arm's length basis and ensure the process for addressing the Complaint complies with this Policy.

All staff are responsible for ensuring the Complaints Management Process is supported, with the overall aim being to educate everyone on how to improve customer service and business outcomes.

6. COMPLAINTS MANAGEMENT STAGES

6.1 Receipt of Complaint

EchoRealty recognises that formal Complaints to the Complaints Officer under this Policy can come through many channels. A Complaint can be made through the following channels, addressed to the 'Complaints Officer':

COMPLAINT SUBMISSION TYPE	COMPLAINT SUBMISSION CHANNEL
Complaint Form	Website or hard copy
Letter	Via post to: Henry Dodd House 9-13 Argyle Street Parramatta NSW 2150; or
Email	ihear.echorealty@evolvehousing.com.au
Telephone	1800 MYEVOLVE (1800 693 865)
To an EchoRealty employee	In person

6.2 Frontline Staff Complaint Handling

EchoRealty is committed to providing timely customer service and will endeavour to provide a resolution to all Complaints at the time of receipt.

EchoRealty encourages Complainants to raise any concerns with their Housing Manager, Contact Officer, Technical Officer or other Frontline Staff in the first instance. Complainants may also ask to speak with a Team Leader, if they remain unsatisfied (or are uncomfortable raising directly with their Housing Manager or other EchoRealty officer).

Frontline Staff Complaint Handling is not governed by this Policy.

6.3 Formal Complaints Management

Should a Complainant be dissatisfied with the resolution proposed by the Frontline Staff, they are welcome to submit a formal Complaint to the Complaints Officer through one of the above channels.

EchoRealty recognises that a Complainant may not be able to personally submit a Complaint in writing. A Complainant may provide consent for a third party to submit a Complaint on their behalf. The consent must be expressly documented and presented at the time of submission.

6.4 Assessment of Complaint

Upon receipt, a Complaint will be assessed for urgency and severity, to ensure any actions required to mitigate serious, or potentially serious risk factors, are implemented immediately. All Complaints are to be acknowledged within two (2) business days of being received.

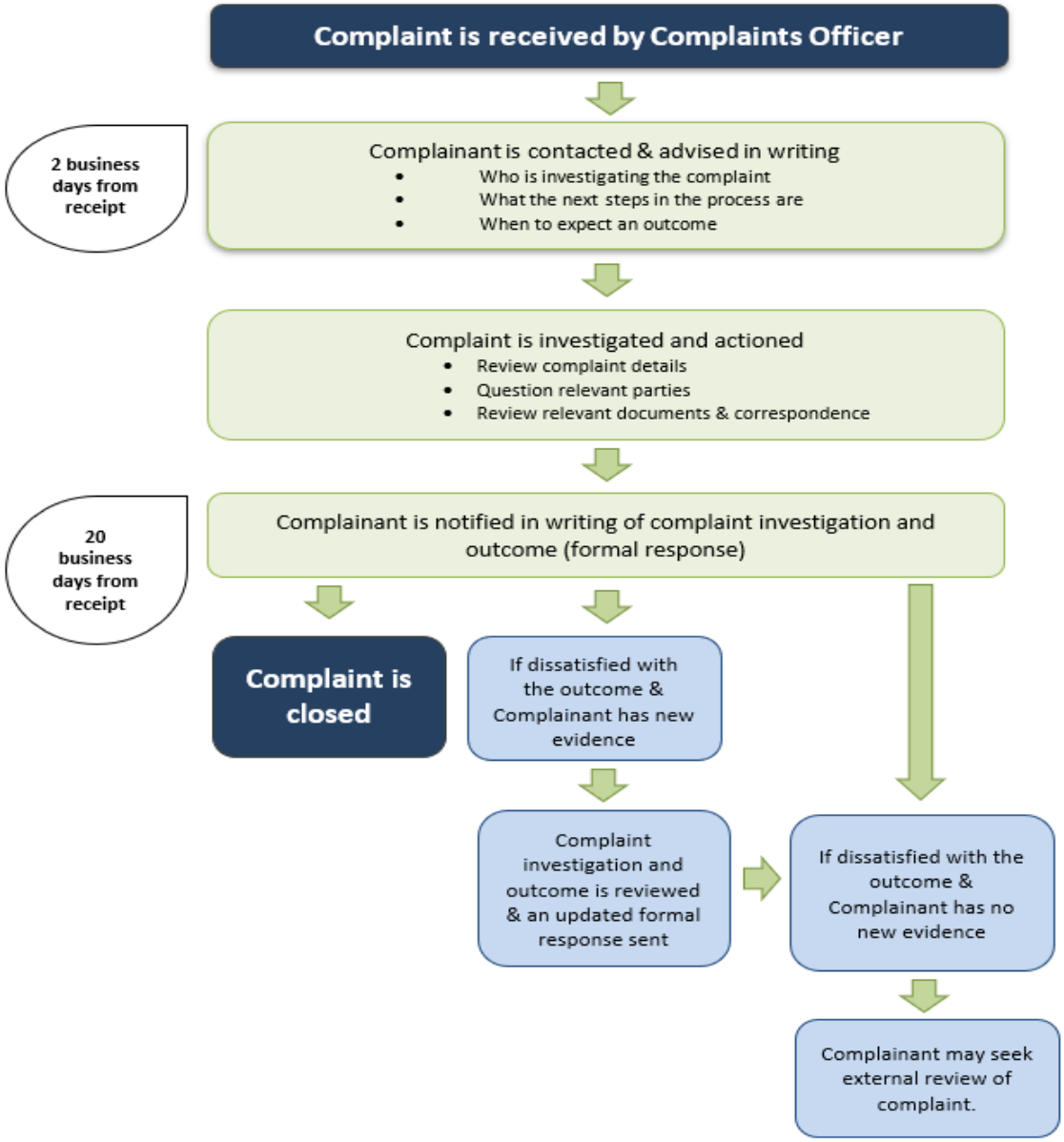
6.5 Response to Complaint

The Complaints Officer will inform the Complainant in writing of the outcome and actions taken by EchoRealty within twenty (20) business days.

If the Complainant is dissatisfied with the outcome and has new evidence/information in relation to their Complaint, the Complainant can seek a review.

EchoRealty reserves the right to implement any recommendations and actions that come from the investigation or review of a Complaint, regardless of whether the Complainant considers them to be satisfactory to their individual case.

6.6 Complaints Management Process Map



7. EXTERNAL COMPLAINT BODIES

If the Complainant is dissatisfied with the outcome, but does not present any new evidence, the Complainant is to be advised that they may wish to seek an external review of the Complaint. The Complainant is to be referred to relevant services which they may choose to contact.

External bodies that the Complainant may wish to consider include:

- NSW Housing Registrar (handles Complaints about community housing providers);
- NSW Ombudsman (where you are unhappy with the way the NSW Housing Registrar has handled your Complaint);
- NSW Civil and Administrative Tribunal (NCAT) (which has jurisdiction over residential disputes between renters and rental providers under the Residential Tenancies Act 2010 (NSW);
- the Tenants Advice and Advocacy Services (which provides free information, advice, and advocacy to NSW renters);
- Community Justice Centres (which provide free mediation to help people resolve disputes without going to court, and offer other alternative dispute resolution services);
- NSW Legal Aid (provides information, legal advice and education with a focus on the early resolution of legal problems to people who qualify for legal aid); and
- NDIS Quality & Safeguards Commissioner (handles complaints about any issue connected with supports or services provided by an NDIS provider, including complaints about how an NDIS provider has dealt with your Complaint).

Housing Registrar Details

Telephone: 1800 330 940
Email: registrar@homes.nsw.gov.au
Post: Registrar of Community Housing, PO Box 2236, Burwood North, NSW 2134

NSW Ombudsman Details

Telephone: 1800 451 524
Online: https://www.ombo.nsw.gov.au/Making-a-Complaint/Complaints-form
Post: Level 24, 580 George Street, Sydney NSW 2000

NSW Civil and Administrative Tribunal

Telephone: 1300 006 228
Online: https://ncat.nsw.gov.au

NDIS Quality & Safeguards Commissioner[AJ1.1]

Telephone: 1800 035 544
Online: https://www.ndiscommission.gov.au/complaints/make-complaint-about-provider-or-worker/complaints-form/question-1-risk

8. ANONYMOUS COMPLAINTS

There will be times when a Complainant may wish to remain anonymous. It can be difficult for an organisation to address Complaints from an anonymous Complainant, and the Complainant is to be advised of this, where possible, at the time of making the Complaint.

9. SOCIAL MEDIA COMPLAINTS

EchoRealty is active on many social media platforms where comments or messages are allowed, and Complaints are potentially made. In these instances, our Marketing and Engagement team, who monitors all our social media accounts, will leave a reply to inform the users on how to lodge their Complaint through our prescribed channels of receiving formal Complaints.
Only when we receive it through those channels, will the matter be considered a formal Complaint and handled in accordance with this Policy.

10. AUTHORITY, EDUCATION AND TRAINING

All EchoRealty staff, required to investigate or resolve Complaints, are to be adequately equipped to respond to Complaints, this includes having the appropriate authority, training, and supervision.
The type of training provided should be commensurate with each staff member's involvement in the Complaints Management Process.

11. RECORDING – COMPLAINTS MANAGEMENT REGISTER

All formal Complaints are to be documented in the Complaints Register. Each Complaint is to record a summary of the Complaint, the finding of the investigation and action taken, as well as any recommended improvements. The Complaints Register is to support the ability of EchoRealty to, for example, monitor categories of Complaints, number of Complaints, range of outcomes, and ability to assess the impact of any recommendations implemented over time.

12. CONFIDENTIALITY

All Complaints are confidential and no identifying information will be shared outside the business without permission.

When a Complaint is made, EchoRealty will record:

- name and contact details;
- details of the Complaint; and
- what outcome the Complainant is seeking.

EchoRealty uses this information to investigate and 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 Personal Information Protection Act 1998 (NSW).

EchoRealty 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 New South Wales Government.
For further information please refer to the *Privacy Policy*.

13. REVIEW AND AUDIT OF COMPLAINTS MANAGEMENT

EchoRealty will regularly review and audit Complaints management against, for example:

- the Policy and procedures;
- performance;
- outcomes; and
- feedback about the Complaints Management Process itself.

Outcomes of a review or audit will be used to improve the Complaints Management Process.

14. REPORTING OF COMPLAINTS

Regular analysis of Complaints will allow the organisation to monitor trends and systemic issues and provide information to formulate improvements to be made. It is also important to identify if there were any internal or external factors that could have affected the Complaints being analysed.

Board & Group Executive Team

The Complaints Officer is to provide de-identified reports, which will provide a summary of the types of Complaints received, an analysis of trends and any recommendations and/or improvements to be implemented. The report will be issued on a biannual basis to the Board.

15. DEFINED TERMS

TERM	DEFINITION
Business Day	a day that EchoRealty is open for business.
Complaint	an expression of dissatisfaction with the standard or type of service provided by EchoRealty, which is made by an external person or organisation (Complainant), and where the Complainant had expected or is requesting a different outcome or result.
Complainant	The person or organisation making the Complaint, or their representative.
Complaints Officer	The person authorised by EchoRealty to manage the formal Complaints Management Process.
Complaints Management Process	the process implemented by EchoRealty to acknowledge, assess, investigate, record and resolve all formal Complaints received by the Complaints Officer.
Frontline Staff	The person who a Complainant has direct contact with on a day-to-day basis such as a Housing Manager, Technical Officer etc.
Investigating Officer	The person authorised by the Complaints Officer to undertake an investigation of a Complaint.
Neighbour Dispute	a dispute with an EchoRealty Resident, which involves a possible breach by the Resident of their Residential Tenancy Agreement, and where an unsuccessful attempt has been made by the two parties to resolve the problem through either discussion or mediation.

Resident	a person who resides on a permanent basis in a property which is owned or managed by EchoRealty under a Residential Tenancy Agreement.

RELATED RESOURCES

RESOURCE
EchoRealty Feedback Form
EchoRealty Complaints Tenancy Information Brochure
Privacy Policy
Code of Conduct Policy

REVISION HISTORY

DATE REVIEWED	POLICY REVIEWER	KEY CHANGES
01.11.2016		Policy adopted
04.07.2022	Raylee Golding, GM GAL/ Co Sec	Application of policy extended to controlled entities (excluding EchoRealty Vic Limited)
22.05.2024	Andrea Jeffrey, Legal Manager, Asst. Co Sec	Update Complaints handling stages, external bodies details & include confidentiality terms
15.09.2025	Andrea Jeffrey, Legal Manager, Asst. Co Sec	Updated to include external complaint bodies for NDIS related complaints.
02.09.2026	Andrea Jeffrey, Senior Legal Manager, Asst. Co Sec	Updated to reflect EchoRealty specific applicability, terminology and supporting resources.

This Policy is subject to change from time to time at the discretion of EchoRealty. Any approvals required under this Policy will be granted in accordance with the Delegations of Authority Policy. Further information on this Policy and other topics, is available on the EchoRealty website www.echorealty.com.au. If you have any specific questions regarding this Policy, please contact EchoRealty on 1800 693 246 or email your enquiry to info@echorealty.com.au.