

City Housing
Noho whare, noho whānau

**Complaints &
Compliments
Procedure (Draft)**

February 2022

Table of Contents

1. Purpose	2
2. Definitions	2
3. Tenant Support	2
4. Privacy and Confidentiality	3
5. Receipt.....	3
6. Logging, Assigning and Acknowledging	3
7. Concerns and Complaints Involving Contractors or Service Providers	3
8. Involvement of Police	3
9. LGOIMA Request.....	3
10. Informal Complaint Process	4
11. Formal Complaints Process	5
12. Appeals – Formal Complaint Decisions	6
13. Delays in Meeting Response Times (Service Levels)	6
14. Post-Investigation Actions	6
15. Storing of Relevant Documentation	6
16. Service Levels, Monitoring and Reporting	7
17. Relevant Documents/Legislation	7

1. Purpose

The purpose of this procedure is to enhance our service as a good landlord to our tenants by responding consistently and in a timely manner to complaints (informal and formal) and compliments raised by tenants. This procedure will:

- ensure that there is a clear process enabling City Housing tenants to make complaints and offer compliments;
- ensure that complaints are investigated, addressed and resolved within expected timelines;
- ensure that City Housing identifies and implements learnings from complaints into systems and operations;
- Ensure that compliments are shared with relevant staff and/or teams, recorded in systems and incorporated into best practice where appropriate.

This procedure does not replace the system of logging day to day maintenance and other issues via the Contact Centre in the first instance.

2. Definitions

- **Informal complaint** – any informal notification received from a tenant about unsatisfactory service that does not require a formal process. It may be received in any format by any staff member.
- **Complaint** – any formal, written notification escalated to the Manager City Housing by a tenant or via a staff member regarding an informal complaint raised by them that was not addressed or not resolved to their satisfaction, or that is considered serious enough to require urgent attention.
- **Compliment** – a positive comment received in any format from a tenant.
- **Tenant Advocacy** – advice and guidance provided to tenants by City Housing staff to familiarise them with this procedure and/or assist with links to external support services for tenants who require assistance with raising a concern or making a formal complaint in line with this procedure.
- **Complaints and Compliments Register (Register)** – register maintained by City Housing to capture complaints and compliments received, monitor service levels and inform improvements.
- **Manager** – City Housing staff member in charge of operational functions within City Housing.
- **Senior Manager** – member of the Senior Leadership Team that has oversight of teams within City Housing.
- **LGOIMA** – request under the Local Government Official Information and Meetings Act for access to official information from local authorities.
- **Privacy Act** – legislation that relates to maintaining the privacy rights of all New Zealanders
- **RTA** – The Residential Tenancies Act 1986.
- **SLT** – Senior Leadership Team at City Housing.
- **WCC** – Wellington City Council.

3. Tenant Support

Tenants are welcome to seek support from a City Housing Tenancy Advisor or external support service or person to raise concerns and complaints. This tenant support should:

- ensure the tenant understands their right to raise complaints through this procedure;
- guide and assist the tenant to follow this procedure, including assistance with raising their complaint via the correct pathway as outlined within it;
- remain unbiased and professional in their support service.

4. Privacy and Confidentiality

Private details of all parties will be kept confidential and only shared with the permission of relevant parties, or where an emergency that threatens the safety of people or property prompts the instigation by City Housing of intervention by relevant external parties.

5. Receipt

All complaints and compliments received will be forwarded by the recipient within two working days of receipt (as indicated by date email, phone call or letter is received) to the Senior Administrator in City Housing for coordination.

6. Logging, Assigning and Acknowledging

Unless a complaint is considered urgent in that the safety of people or property is at immediate risk, in which case it will be referred to a senior management for urgent action, the Senior Administrator (or delegate as required) will, within 3 working days of receipt of a complaint or compliment:

- log it in the Complaints and Compliments Register (Register) and allocate a complaint or compliment number; assign informal complaints to the relevant City Housing staff member (with a copy to their manager) to investigate, determine actions and respond with outcome to affected parties;
- forward formal complaints to the Manager City Housing for assigning to a manager or senior manager;
- report compliments to Senior Manager for sharing with staff;
- acknowledge in writing (mail or email) receipt, including where relevant an indicative timeline of investigation and the staff member assigned to investigate (Appendix 1);
- record any subsequent enquiries about an ongoing case and forward to the relevant staff member to respond to.

7. Concerns and Complaints Involving Contractors or Service Providers

Issues involving external contractors or service providers will be referred to them by the assigned investigating manager and dealt with within timeframes agreed to within individual contracts for service and monitored by the investigating manager. An internal investigation may proceed in conjunction with one conducted separately by the contractor or service provider.

Response times of contractors will be reported on as part of performance monitoring and renewal/review of contracts.

8. Involvement of Police

If Police are involved in an issue raised by a tenant, City Housing will conduct their own internal investigation and determine the outcome in the best interests of all tenants.

If it is deemed that the immediate safety of people is at risk at any stage of an investigation process, City Housing will involve Police and/or issue breach notices in line with the RTA. Disclosing personal information to Police will be in accordance with IPP11 of the Privacy Act.

9. LGOIMA Request

Where a LGOIMA request is made as part of a concern or complaint, the WCC Information Request process will be followed and replaces this procedure.

10. Informal Complaint Process

The purpose of raising an issue as an informal complaint in the first instance is to resolve issues quickly and effectively, enhancing customer satisfaction and preventing the need for a formal complaints process. Informal complaints received will:

- be in any format to any Council staff member;
- be logged as outlined in Clause 5 of this procedure;
- identify as much specific detail as possible regarding the grounds for the informal complaint;
- identify the person raising the informal complaint;
- be dealt with for resolution through informal process of investigation.

10.1 Investigation of an Informal Complaint

The assigned staff member will investigate, determine actions and respond to affected parties within 15 working days of being assigned the informal complaint. If for whatever reason this time frame is unable to be met, the affected parties will be kept informed of new timelines and the reason for them.

10.2 Investigation Process

The investigating staff member will:

- Declare there is no conflict of interest;
- not have been involved in the circumstances leading to the informal complaint raised;
- remain unbiased, professional and open-minded throughout the investigation;
- speak separately to all parties relevant to the informal complaint, taking notes of responses;
- fully inform all parties connected to the informal complaint of the detail, the process and ensure they have the right to be heard in response to those informal complaints;
- make a decision in relation to the informal complaint, including actions to be taken, after considering all information obtained as a result the investigation.

10.3 Response to Affected Parties

The investigating staff member will relay their decision, verbally or in writing, to the affected parties within 15 working days of being assigned the informal complaint for investigation. A summary of this response will be provided to the Senior Administrator (or delegate as required), who will ensure the matter is logged in the Register as complete. Any verbal decision given will be followed up with a written version of the outcome.

10.4 Dissatisfaction with Outcome – Escalation

If the tenant who raised the informal complaint is not satisfied with the outcome, they can decide to lodge a formal complaint within 20 working days of receipt of response, as outlined section 10 of this procedure.

11. Formal Complaints Process

The purpose of raising a formal complaint is to escalate informal complaints previously raised that were not addressed or were not resolved to the tenant's satisfaction. Formal complaints received:

- must be in writing;
- should be addressed to the Manager City Housing or, if received by another staff member, referred immediately to the Manager City Housing;
- will identify as much specific detail regarding the grounds for the formal complaint;
- will identify the complainant;
- will be dealt with for resolution through formal process of investigation.

11.1 Investigation of Formal Complaint

The assigned manager or senior manager will investigate, determine actions and respond to affected parties within 15 working days of being assigned the formal complaint. If for whatever reason this time frame is unable to be met, the affected parties will be informed of delays and the reasons for them.

11.2 Investigation Process

The investigating manager will:

- have sufficient expertise to conduct formal investigations and will not have been involved in the circumstances leading to the formal complaint;
- remain unbiased, professional and open-minded throughout the investigation;
- refer to and complete a Complaint Process Checklist (refer to Appendix 2) throughout the process;
- consider all previous information pertaining to the original concern raised;
- formally contact affected parties by letter or email to attend separate meetings in response to the complaint (refer to Appendices 4). The letter will include:
 - outline of the complaint;
 - details of meeting;
 - encouragement for all parties involved to bring support;
 - confidentiality requirements;
 - copy of this procedure.
- interview separately all parties relevant to the complaint, with notes taken by note taker for transcription if required;
- where parties have allegations made against them, fully inform them of the allegations, respecting the privacy of the complainant as per the Privacy Act unless they consent to their details being provided or the situation is an emergency requiring the instigation of external intervention, and ensure they have the right to be heard in response to those allegations;
- take relevant advice and/or peer review as required throughout the process;
- make a decision in relation to the complaint, including actions to be taken, after considering all information obtained as a result of the investigation;
- complete a Complaint Summary Form (Appendix 3).

11.3 Response to Affected Parties

The investigating manager will relay the outcome to the affected parties, in writing using the communication channel in which the complaint was first raised, within 15 working days (refer to Appendix 5) of being assigned the formal complaint. A copy of this response will be provided to the Senior Administrator, who will ensure the matter is logged in the Register as complete.

12. Appeals – Formal Complaint Decisions

When a tenant complainant is dissatisfied with the outcome of their formal complaint, they may appeal to the Manager City Housing, in writing, within 20 working days of the date of the decision letter.

- Appeals received from tenants are forwarded by the recipient to the Senior Administrator for logging in the Register and referring to the Manager City Housing;
- The Manager City Housing will consider all relevant documentation from the original investigation and may consult the person who made the decision and/or re-interview any parties to the complaint;
- The Manager City Housing may uphold or dismiss the appeal in whole or in part and will communicate the outcome of the appeal to the tenant that lodged it, and all interested parties, within 15 working days of receiving the appeal application.
- Tenants that have lodged appeals will be directed to the Tenancy Tribunal website for information relating to pathways available to them should they wish to take the formal complaint further externally. If tenants require support to lodge an appeal with the Tenancy Tribunal, they can seek support as outlined in Clause 3.

13. Delays in Meeting Response Times (Service Levels)

Our expected response times to tenants throughout this process are captured and monitored in Complaints and Compliments Register. Assigned investigators are responsible for informing all parties of the reason for delays and updated timelines, and these are referred to the Senior Administrator for updating in the Register.

14. Post-Investigation Actions

Once the investigation is completed, the investigating manager will prompt appropriate action(s) to be implemented within a specified timeline as follows:

- If the issue involves a City Housing process or service that the manager decides has substance, the relevant process or service will be referred to the responsible senior manager for review to minimise risk and prevent recurrence;
- If the issue involves substantiated anti-social behaviour by a tenant, the matter will be referred to Operations Manager to instigate relevant warnings/breach notices (as outlined in the RTA);
- If the issue involves substantiated misconduct by an employee, the matter will be referred to the employee's manager for instigation of relevant Wellington City Council HR processes.

Decisions relating to actions and timelines will be recorded and monitored in the Register by the Senior Administrator (or delegate).

15. Storing of Relevant Documentation

All documentation pertaining to complaints and compliments are forwarded by the investigator to the Senior Administrator in City Housing for collation and archiving within relevant City Housing files, except matters pertaining to HR, which will be referred confidentially to the employee's Manager for action and personnel filing.

16. Service Levels, Monitoring and Reporting

Service Level	Monitoring Method	Monitoring Frequency	Report To	Report Frequency
Complaints and compliments will be referred to Senior Administrator by recipient within two working days of receipt	Tenant Complaints and Compliments Register	Monthly	SLT	Quarterly
Tenant sent acknowledgment of receipt by Senior Administrator within two working days of receipt	Tenant Concerns, Complaints and Compliments Register	Monthly	SLT	Quarterly
Tenants will receive outcome by investigator within 15 working days	Tenant Concerns, Complaints and Compliments Register	Monthly	SLT	Quarterly
Appeals are received within 20 days of date of complaint outcome letter	Tenant Concerns, Complaints and Compliments Register	Monthly	SLT	Quarterly
Appeals will be finalised within 15 working days of receipt	Tenant Concerns, Complaints and Compliments Register	Monthly	SLT	Quarterly
Recommended actions by investigator are closed off by due dates	Tenant Concerns, Complaints and Compliments Register	Monthly	SLT	Quarterly
Data reporting	Quarterly Report	Quarterly	Manager City Housing	Quarterly

17. Relevant Documents/Legislation

Output Title	Purpose of Output
WCC Information Request Procedure	Takes precedence over this procedure in instances of LGOIMA requests
WCC Information Management Standard	To guide staff to comply with relevant legislation
Residential Tenancy Act	Relevant legislation
Appendices to procedure: Complaints Process Checklist Complaint Summary Form Template Letters	To guide staff through a complaints investigation process Used to summarise details of complaint and actions To guide staff with appropriate communication throughout the stages of the process
Template Register	To be maintained for monitoring and reporting purposes