

Purpose

This policy aims to ensure Key2 Realty Pty Ltd (Key2) has a consistent and systematic approach to managing complaints and appeals. It further serves to highlight the importance of client satisfaction to our organisation and ensures that the complaints and appeals process is clear and accessible and is managed fairly and promptly.

Scope

For the purposes of this policy:

- a **complaint** is an expression of dissatisfaction with the standard or type of service provided by Key2, which is made by an external person or organisation (complainant), and where the complainant had expected or is requesting a different outcome or result.
- an **appeal** is an expression of dissatisfaction with a decision it has made. The appeal 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 and Key2's mission and values.

This policy **DOES NOT** apply to:

- complaints by a tenant about another tenant or by or about a neighbour.
- complaints or disputes that are managed under contract specific resolution processes.
- standard service enquiries.
- issues that fall outside the jurisdiction of Key2 such as matters for Centrelink, Child Protection Agency and NSW Police.
- matters which have escalated to another forum such as Court or NCAT.
- complaints about external contractors not engaged via Key2.
- disputes and grievance of employees.
- concerns about fraud, misconduct or illegal activity by Key2 employees or its Board as are handled by the Fraud Officer and in accordance with the Fraud Policy and notified to the LIC as appropriate.
- non-appealable decisions.

Principles

1. Commitment

Key2 understands that unexpected problems occur 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 people who have been disadvantaged by a Key2 action or decision.
- make the complaint process simple and accessible.
- to improve our service delivery and assist us to review what is or is not working well in our organisation.

The following table outlines the nature of the commitment expected from employees and the way that commitment should be implemented:

Who	Commitment	How
Board Chair	Provide strategic oversight in relation to complaints.	Manage any complaints in relation to the Group CEO.
Group CEO and Licensee in Charge (LIC)	Promote a culture that values complaints and their effective resolution.	Report to the Board on our complaint handling. Provide adequate support and direction to employees responsible for handling complaints. Regularly review reports about complaint trends and issues arising from complaints. Support appropriate recommendations for service and complaint handling improvements arising from the analysis of complaint data or employee suggestions.
All employees	Understand and comply with our complaint handling practices.	Treat all people who make complaints with respect. Follow our complaint handling policies and procedures. Assist people who wish to make complaints access our complaints process. Be alert to complaints and assist staff handling complaints resolve matters promptly. Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.

2. What is an Appealable Decision?

Appealable decisions relate specifically to affordable housing applicants and tenancies only. Affordable housing appealable decisions include:

- eligibility for housing.
- rental subsidy issues and tenant charges.

- anti-social behaviour.

Issues that cannot be appealed include:

- decisions that are not directly related to the person or household.
- matters that are the responsibility of other bodies or tribunals (such as orders made by the NSW Civil and Administrative Tribunal (NCAT)).
- internal administrative and funding matters of the housing provider.
- complaints about the way a service is provided.
- programs not related to the provision of a service.

3. How to make a Complaint or Appeal

Key2 aims to make the process for making a complaint or appeal fair and accessible. There is no charge for making a complaint – it's free.

Any person involved in the complaint or appeal process can expect to be listened to and treated with respect and dignity at all times. Making a complaint or appeal will not result in any form of retaliation or discrimination, including any change in attitude or quality of service received from Key2 employees.

While complaints and appeals are managed differently, Key2 does not expect an individual to identify whether their matter is a complaint or an appeal. This will be identified and clearly communicated to an individual when a complaint or appeal is received.

We will protect the identity of people making complaints where this is practical and appropriate. We accept anonymous complaints if there is a compelling reason to do so and will carry out an investigation of the issues raised where there is enough information provided.

Complaints and appeals can be by:

- email to info@key2realty.com.au
- completing the [online form](#) on our website
- calling Key2 on (02) 4326 5566
- making an appointment for assistance in documenting the complaint at Key2's office at 280 Mann Street Gosford.

If you require help to make a complaint or appeal, you can ask someone to support you e.g. family member, friend, legal or community representative. External services that can assist with making complaints include:

- Local Tenants' Advice and Advocacy Services listed on www.tenants.org.au
- Community Legal Centres contactable through www.clcnsw.org.au
- NSW Fair Trading on 13 32 20 and at www.fairtrading.nsw.gov.au

- [NSW Registrar of Community Housing](#) – 1800 330 940 – registrar@homes.nsw.gov.au

4. Communication

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process.
- the expected time frames for our actions.
- the progress of the complaint and reasons for any delay.
- their likely involvement in the process.
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

5. Timeliness

Key2 will aim to acknowledge your complaint or appeal within two (2) business days and to resolve them within 21 business days of receipt.

In situations where resolution or an outcome will exceed 21 days, Key2 will advise the complainant or appellant of progress to date, the anticipated date of resolution and any reasons for the delay.

For an appeal to be considered, Key2 would expect to receive the desire to make an appeal within 3 months of the decision made. However, some timeframes may be shorter having regard to the decision that is being requested for appeal.

6. What happens if I disagree with the outcome of my complaint or appeal?

If you are unhappy with the outcome of your complaint or appeal you can request a review of the matter by the Group CEO (first review).

If you are unhappy with the decision of the CEO you may be able to appeal externally to the following bodies:

- [NSW Fair Trading](#) – 13 32 20.
- [NSW Registrar of Community Housing](#) – 1800 330 940 – registrar@homes.nsw.gov.au

- [Housing Appeals Committee](#) 1800 629 794 – hac@homes.nsw.gov.au or [online](#) (if appeal is regarding eligibility, allocation or rent-setting and the issue is subject to an independent review).

7. How Key2 uses information from Complaints and Appeals

Key2 will regularly review information from complaints and appeals to identify ways in which our services and their delivery can be improved and regularly review our complaint management system to ensure its effectiveness in responding to and resolving complaints.

We will also provide information on complaints and appeals received to comply with the reporting requirements of the National Regulatory System for Community Housing (NRSCH). Key2 will always use information from complaints and appeals in a way that does not identify the complainant or appellant where possible.

Version Control

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