



NatHERS Complaint Management Policy

Version 1.0

OFFICIAL
Complaint Management Policy

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Cataloguing data

This publication (and any material sourced from it) should be attributed as: NatHERS Complaint Management Policy version 1.0, Department of Climate Change, Energy, the Environment and Water, Canberra, March 2025. CC BY 4.0.

This publication is available at nathers.gov.au/publications.

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Acknowledgement of Country

We acknowledge the Traditional Owners of Country throughout Australia and recognise their continuing connection to land, waters and culture. We pay our respects to their Elders past and present.

At a glance: Making a complaint

Everyone has the right to raise complaints about NatHERS accredited assessors or delivery partners, and/or the NatHERS Administrator. NatHERS delivery partners are the first point of contact for all complaints about the assessors they accredit and the services they provide.

When making complaints, you can:

- remain anonymous, although this may limit how your complaint can be addressed
- ask questions about the complaint process, including how your privacy will be protected
- be supported by a friend or family member, an advocate, an interpreter, or a community Elder
- request how you prefer to be contacted, e.g. phone, email

Send complaints about NatHERS accredited assessors to the assessor's accreditation service provider:

Include the main facts such as your contact information, a description of the problem and the outcome you want, relevant dates and times, and attach relevant supporting information. Your complaint will be registered and assessed to work out how it should be handled. It will be acknowledged within **5 business days** of the date it is received.

Provider	Email	Phone	Website	Post
Australian Building Sustainability Association	admin@absa.net.au	Not available	www.absa.net.au	PO Box 856, North Sydney NSW 2029
Design Matters National	info@designmatters.org.au	03 9416 0227	www.designmatters.org.au	PO Box 429, Elwood VIC 3184
House Energy Raters Association	www.hera.asn.au	0447 099 392	Not available	96A Trudy Crescent, Cornubia QLD 4130
NatHERS Administrator	admin@nathers.gov.au	1800 920 528	www.nathers.gov.au	GPO Box 3090, Canberra ACT 2601

If the matter is straight forward and likely to be easily resolved

The assessor accreditation service provider will work out how to resolve your complaint, take any necessary actions, and inform you of the outcome at the earliest possible opportunity. They will try to resolve your complaint within 30 business days. If they are unable to do so, they will tell you this and the reasons for the delay.

If the matter is complex, or unlikely to be easily resolved

Your complaint will be allocated to a staff member who is responsible for reviewing and resolving your complaint, and who will collect relevant information and evidence and make a complete record of the matter.

As part of the process, they will assess if your complaint raises matters that may require referral to a regulatory authority or law enforcement. If there are matters in your complaint that need to be referred to a regulatory authority or law enforcement, the person handling your complaint will refer it directly if they are able to do so. If not, they will assist you to find the correct agency to deal with it.

The time to resolve complex complaints varies based on a range of factors. If your complaint cannot be resolved within 30 business days, you will be provided with regular progress updates every 20 business days.

When investigations are completed, the assessor accreditation service provider will decide how your complaint should be resolved and advise you of the outcome. They will explain the steps they took and the reasons for their decisions.

If you are unhappy with the outcome of your complaint you can request an internal review. Your request must be sent to the assessor accreditation service provider within **30 days of the date they notified you of the outcome** of your complaint. You should tell them why you believe they have made an error and include any supporting information.

The review will be undertaken by someone who was not the original decision maker. They will consider all relevant information and may decide to confirm, vary, or revoke the decision. If revoked, a fresh decision will be made.

The reviewer will tell you what the review decided, what steps were taken, and the reasons for the decision. You will also be advised of any external review options available to you following the review.

Complaints about NatHERS delivery partners should be made to the delivery partner in the first instance. If your complaint is not satisfactorily resolved by them, you can send your complaint to the NatHERS Administrator.

Complaints about assessors not accredited by NatHERS cannot be resolved by the NatHERS Administrator or our assessor accreditation service providers. However, if you contact the NatHERS Administrator or any of our approved assessor accreditation service providers, we may be able to assist you to identify where to direct your complaint.

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1 Purpose

Where errors, misunderstandings or unexpected problems occur, we encourage people to let us know so we can act quickly to take any necessary corrective action and identify ways to improve outcomes.

This policy described how complaints about NatHERS can be made and how they are managed. Changes to this NatHERS Complaint Management Policy document are communicated are published on www.nathers.gov.au

2 Principles

All members of the public have the right to make complaints. Complaints provide us valuable feedback that helps to improve NatHERS programs and services, ensuring we meet your expectations of high quality and timely services and make fair and transparent decisions. Our approach to complaints management is:

Make it easy:

Information about how and where to complain is readily available and easy to understand, and methods for making complaints are accessible to diverse groups of people. There are no costs for making a complaint.

Make it responsive:

Complaints are acknowledged and dealt with in a timely way, and people are kept informed of the progress of their complaint. Where a commitment to action is made by us, it is followed through.

Make it fair:

Privacy of information is protected as much as possible, and all parties are treated with respect. Complaints are dealt with reasonably and fairly, regardless of cultural identity, national origin, religion, linguistic background, sex, gender expression, sexual orientation, physical or intellectual ability, socioeconomic status, or other cultural or personal factors. Decisions are transparent, objective, and accountable.

Confidence in the integrity of our complaints processes is our priority. People have a right to make a complaint without fear. Reprisal action against a person who makes a complaint is not tolerated and if proven, is treated as serious misconduct.

3 Who you can complain about

NatHERS accredited assessors: Energy performance assessors accredited under NatHERS to produce NatHERS ratings and certificates.	Approved NatHERS delivery partners: Third party organisations approved by the NatHERS Administrator to provide services to assessors. <ul style="list-style-type: none">• Assessor accreditation service providers accredit assessors and oversee assessor compliance with the obligations of accreditation.• Software Providers provide and maintain software tools accredited by NatHERS, which collect and process data and information to produce a NatHERS energy rating and certificate.	The NatHERS Administrator: Sets the rules for NatHERS and ensures approved NatHERS delivery partners are compliant with their obligations to the scheme. Complaints about the NatHERS Administrator Complaints about the decisions, acts (or failure to act) and behaviour of the NatHERS Administrator and NatHERS staff are managed under Department of Climate Change, Energy, the Environment, and Water (DCCEEW) processes. Complaints can be made via client feedback
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4 What is a complaint

A complaint is an expression of dissatisfaction about the services or actions of a NatHERS **accredited assessor** or a **NatHERS delivery partner**, and where a response or resolution is explicitly or implicitly expected. Examples of when a complaint might reasonably be made include:

- Poor accessibility or quality of services.
- Inadequate knowledge/training of an assessor or approved NatHERS delivery partner staff.
- Poor treatment by an assessor or approved NatHERS delivery partner such as rude behaviour or language, discrimination, or harassment.
- Incorrect or unfair decisions, or reasons for decisions not properly explained.
- Fraud and compliance issues.
- Not responding to requests or applications, delays providing services, and/or no explanation for inaction or delays.
- Disagreement with policy or process, flawed or deficient policy and process, or policy and process that has not been properly explained.

4.1 What is not a complaint

An initial request for a service or action, or requests for information, explanations or updates are not considered complaints.

Feedback may be compliments, criticisms, comments, overall statements of opinion, or suggestions. Criticism is not treated as a complaint if the person providing the criticism is not seeking a response to their feedback.

When making complaints, you:

- can ask a friend, a family member, an advocate, an interpreter, or a community Elder to support you to make your complaint, understand information provided to you about your complaint to respond to any requests for further information, or to request an internal review.
- can tell us how we should communicate with you.
- can remain anonymous, although this may limit how your complaint can be resolved.
- can ask questions about the complaints process, including how we protect your privacy when you make a complaint.
- will be provided with information about how your complaint will be managed, including what you can do if you are unhappy with the result.

5 Making complaints

5.1 Complaints about NatHERS accredited assessors

Complaints about accredited assessors are dealt with by the relevant assessor accreditation service provider. There are currently three organisations approved to accredit NatHERS assessors to provide NatHERS ratings for new homes. The NatHERS Administrator accredits assessors to provide NatHERS ratings for existing homes.

Australian Building Sustainability Association

e: admin@absa.net.au
w: www.absa.net.au
p: PO Box 856, Nth Sydney NSW 2059

Design Matters National

t: 03 9416 0227
e: info@designmatters.org.au
w: www.designmatters.org.au
p: PO Box 429, Elwood VIC 3184

House Energy Raters Association

t: 0447 099 392
w: www.hera.asn.au
p: 96A Trudy Cres, Cornubia QLD 4130

NatHERS Administrator

t: 1800 920 528 (DCCEEW General Enquiries)
e: admin@nathers.gov.au
w: www.nathers.gov.au
p: GPO Box 3090, Canberra ACT 2601

5.2 Complaints about NatHERS energy rating tools

Complaints about NatHERS energy rating tools are dealt with by the relevant software provider. There are currently four NatHERS energy ratings tools.

AccuRate* w: www.csiro.au/en/contact/complaints	FirstRate5 e: frstrate_admin@fr5.com.au & copy to support@fr5.com.au
BERS Pro w: www.energyinspection.com.au/contact-us	HERO e: admin@hero-software.com.au

** The AccuRate tool is provided by the Commonwealth Scientific and Industrial Research Organisation (CSIRO). Complaints that relate to the AccuRate software or CSIRO's obligations under the NatHERS should specify this and be marked to the attention of the Energy Systems Research Program.*

5.3 Complaints about NatHERS delivery partners

NatHERS expects its delivery partners to act with professionalism and to high standards of accountability. Complaints about approved NatHERS delivery partners should be made to the delivery partner in the first instance. If the complaint is not satisfactorily resolved by the delivery partner, you can send your complaint to the NatHERS Administrator.

e: admin@nathers.gov.au
t: 1800 920 528 (DCCEEW General Enquiries)
w: www.nathers.gov.au
p: NatHERS Administrator,
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090, Canberra ACT 2601

5.4 What happens to your complaint

Whether you make a complaint about an assessor to one of the assessor accreditation service providers, or your complaint is ultimately managed by the NatHERS Administrator, it will be handled the same.

Your complaint will be acknowledged, registered, and assessed to determine how it should be managed. If the complaint can be resolved straight away, it will be. If the matter is complex or unlikely to be easily resolved, your complaint will be allocated to a responsible officer for further investigation. You will be advised of the outcome of your complaint, including steps taken to arrive at the outcome, and reasons for decisions.

5.5 NatHERS response times for complaints

Complaints are **acknowledged and registered within 5 business days of receipt**.

The time it takes to resolve complaints can vary depending on a range of factors including the complexity of the complaint. Where possible, complaints will be resolved within 30 business days (not including time in which the person handling your complaint is waiting on more information from you). If your matter cannot be resolved within the 30 business day timeframe, you will be told why and provided an update every 20 business days.

6 Responsibilities in complaints

6.1 Your responsibilities

When making a complaint, you are responsible for:

- Providing a clear description of the problem and what you would like to happen.
- Providing as much relevant information and supporting evidence as available at the time of making the complaint. This assists your complaint to be resolved much more quickly.
- Promptly advising of changes that affect your complaint, including if you no longer wish to progress your complaint.
- Understanding that decisions are based on the information and evidence that were available at the time the decision was made. This means some decisions and outcomes cannot be overturned or varied.
- Engaging respectfully with the person handling your complaint.

6.1.1 Unreasonable conduct

NatHERS is committed to ensuring complaints processes and other services are accessible, timely and fair for everyone, and support the wellbeing of the people involved in handling the complaint. Complaints are managed based on the merits of the complaint, rather than a person's demands or conduct.

People who behave unreasonably in their dealings with NatHERS or NatHERS delivery partners can adversely impact the accessibility and responsiveness of services to other people, as well as the wellbeing of staff.

Unreasonable conduct is any behaviour by a person which, because of its nature or frequency, raises substantial wellbeing, health, safety, resource or equity issues for NatHERS staff, NatHERS delivery partners, other NatHERS users, or the complainant themselves.

Examples of conduct that could, either in isolation or taken together, constitute unreasonable conduct includes the following:

- **Unreasonable persistence** — This includes refusal to accept a final decision and persisting with issues despite advice that the issue has been fully considered and that no further action will be taken. For example, if a person makes excessive telephone calls, sends excessive emails or letters, or supplies excessive volumes of paperwork in support of their complaint.

- **Unreasonable demands** — This includes insisting on outcomes that are unattainable or demanding to have a matter dealt with in a particular way that is not reasonable. For example, if a person demands more reviews than provided for in this policy or demands a different outcome without demonstrating how the original decision was wrong.
- **Unreasonable lack of cooperation** — This includes providing unreasonably disorganised, excessive or irrelevant information, an unwillingness to consider other viewpoints, or a refusal to define issues of concern.
- **Unreasonable arguments** — This includes unreasonably irrational cause and effect arguments, raising conspiracy theories unsupported by evidence, or illogically interpreting facts or laws.

Unreasonable conduct is not tolerated and may result in all further complaint processes and communication from NatHERS in relation to the complaint, being terminated. Prior to terminating a complaint, we will provide you with a written warning that your conduct is unreasonable. Should we decide to terminate a complaint, we will inform you in writing of the decision and on what basis, and your options to seek a review of the decision.

6.2 NatHERS responsibilities

The NatHERS Administrator and approved NatHERS delivery partners are responsible for:

- Fostering a culture that is receptive to complaints, and ensuring staff who deal with complaints can resolve them at the earliest opportunity.
- Ensuring that all matters are followed through to conclusion in a timely manner, and keeping you informed on the progress of your matter.
- Engaging with you respectfully when handling your complaint, ensuring decisions are fair and objective, and ensuring actions taken are proportionate to the matter.
- Ensuring the ways that people can make a complaint, and related information, are accessible and fit for purpose.
- Ensuring accurate records are kept about complaints and are used to make improvements where required.

7 Resolving complaints

Where a complaint is substantiated, you can expect accountability, and that appropriate action will be taken. Resolutions to complaints will be fair, practical, and proportionate to the seriousness of the matter. Resolving complaints may involve:

- Acknowledging the matter and apologising
- Providing better explanations for policies, decisions, or actions.
- Explaining what is being done to prevent an issue from happening again.
- Reversing or varying an earlier outcome.
- Requiring remediation of an error.
- Taking performance improvement action against an accredited assessor.

- Taking performance improvement or enforcement action against an approved NatHERS delivery partner.
- Other appropriate means of redress.

Decisions about complaints, including the appropriateness and proportionality of resolutions, will be made with consideration of the [NatHERS Compliance and Enforcement Framework](#) (Ratings for new homes) and NatHERS for existing homes Assurance Strategy.

7.1 Internal review

If you are not satisfied with the outcome of your complaint, you can request an internal review.

Internal reviews are conducted by experienced staff who have not previously been involved in your matter.

A request for internal review must **be received within 30 business days of the date you were notified of the outcome of your complaint**. Your request should explain why you believe the initial outcome is incorrect or unreasonable, and any supporting information or evidence.

You will be advised of the outcome of any internal review process, and any external review options available to you.

Where possible, internal reviews are completed within 60 business days of the request date (not including time in which the person managing your complaint is waiting on more information from you).

7.2 External review

7.2.1 Complaints managed by delivery partners

If you are not satisfied with the outcome or handling of your complaint by a delivery partner, such as an assessor accreditation service provider or software provider, you can request an external review by the NatHERS Administrator.

The NatHERS Administrator will generally not consider conducting a review if the delivery partner has not been given an opportunity to review their original decision.

Where possible, external reviews are completed within 60 business days of the request date (not including time in which we are waiting on more information from you).

7.2.2 Complaints managed by the NatHERS Administrator

If you are not satisfied with an outcome of the NatHERS Administrator's handling of your complaint, you can raise your concerns with the [Commonwealth Ombudsman](#).

8 Complaints NatHERS cannot deal with

Some complaints may be beyond the NatHERS Administrator and delivery partner's authority to resolve. Wherever possible, you will be assisted to identify alternative avenues you can take to resolve your complaint.

8.1 Payment disputes with assessors

Assessors deliver NatHERS ratings as privately operated businesses. Payment disputes between you and your assessor may be able to be resolved through a local state and territory consumer protection agency. The Australian Consumer and Competition Commission maintains a list of state and territory agencies on its [website](#).

8.2 As-built compliance for new home ratings

Energy performance ratings for new homes are based on the design information provided by builders or architects. Matters where the construction of a new home is different to the design information that the NatHERS rating was based on may be able to be resolved by your state or territory building authority. The Australian Building Codes Board maintains a list of state and territory building authorities on its [website](#).

8.3 Regulatory or criminal matters

Complaints that involve actual or suspected unlawful behaviour must be referred to the relevant authority. If a complaint requires referral to other agencies or authorities, you will be assisted to identify the appropriate organisation to deal with your complaint.

8.4 Complaints about a Registered Training Organisation (RTO)

Registered Training Organisations (RTOs) are regulated by the Australian Skills Quality Association (ASQA). The NatHERS Administrator has no authority to resolve complaints about RTOs.

If you have a complaint about your training provider, the first step is to submit feedback through the training provider's complaint process. Information about your training provider's complaint process should be available in your student handbook or on their website.

For further information contact your RTO or refer to the [ASQA website](#).

9 Improving complaint management

NatHERS is committed to ensuring that Australians remain confident in the scheme. The NatHERS Administrator is accountable for ensuring complaints processes are user-friendly, accessible, responsive, and transparent.

To ensure people making a complaint are being treated fairly, approved NatHERS delivery partners may be audited periodically by the NatHERS Administrator for compliance with complaints handling processes.

Staff provide periodic reporting on complaints to senior management, who use this information to ensure our complaints processes are working well and to identify opportunities for improving NatHERS.

9.1 Feedback on NatHERS complaints policy

Your feedback about this publication and/or NatHERS approach to complaints can be sent to:

e: admin@nathers.gov.au
t: 1800 920 528 (DCCEEW General Enquiries)
w: www.nathers.gov.au
p: NatHERS Administrator
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090, Canberra ACT 2601

Related Information

- [NatHERS Privacy Policy](#)
- [NatHERS Information Collection, Storage and Dissemination Policy](#)
- [Protocol for Assessor Accrediting Organisations](#)
- [Software Accreditation Terms and Conditions](#)

Glossary

Term	Definition
Assessor accrediting organisation (AAO)	AAOs are the organisations, approved by the NatHERS Administrator, that in turn accredit NatHERS assessors for assessments of new homes.
AAO Protocol	The NatHERS Protocol for Assessor Accrediting Organisations (AAO Protocol) outlines the requirements suitably qualified organisations must meet and maintain to be approved under NatHERS to be AAOs, and to then accredit NatHERS assessors for new homes.
Accredited Assessor	A person accredited by an AAO or AASP to perform NatHERS for existing homes or NatHERS for new homes assessments.
Assessor accreditation service provider (AASP)	The assessor accreditation service provider (AASP) is the entity that manages the accreditation of NatHERS for existing homes assessors.
Energy rating tools	Software tools used to interpret design or dwelling data to produce NatHERS energy ratings and certificates. This includes both desktop and cloud-based tools and third-party accredited tools.
Delivery partners	Third-party organisations approved by the NatHERS Administrator to provide NatHERS energy rating tools or assessor accreditation services.
Complaint	An expression of dissatisfaction about the services or actions of a NatHERS accredited assessor or an NatHERS delivery partner, and where a response or resolution is explicitly or implicitly expected
NatHERS	Nationwide House Energy Rating Scheme
NatHERS Administrator	NatHERS is administered by the Australian Government on behalf of all states and territories. The role of NatHERS Administrator is a function of the Australian Government Department of Climate Change, Energy, the Environment and Water (DCCEEW), or any subsequent Australian Government department that assumes responsibility for residential energy efficiency.
Unreasonable Conduct	Behaviour by an individual which, because of its nature or frequency, raises substantial wellbeing, health, safety, resource or equity issues for NatHERS staff, NatHERS delivery partners, other NatHERS users, or the individual themselves