

## 1. PURPOSE

- 1.1. The purpose of this procedure is to outline the responsibilities and objectives for managing the complaints handling and reporting processes associated with Loris H Hassall Trading Pty Ltd – Forbes ('LHHT') operations.
- 1.2. LHHT is committed to being consistent, fair and impartial when handling any complaint. The objective of this procedure is to ensure:
  - a) Awareness of LHHT's complaint lodgement and handling processes,
  - b) A clear understanding of the complaints handling process,
  - c) Complaints are investigated impartially with a balanced view of all information or evidence,
  - d) Reasonable steps are taken to actively protect personal information,
  - e) All complaints are considered on its merits taking into account individual circumstances and needs,
  - f) Build Public confidence and accountability.

## 2. SCOPE

- 2.1. This procedure is applicable to all LHHT employees including labour-hire, contractors and visitors, collectively known as "**workplace participants**", managing complaints on site.
- 2.2. This procedure also provides guidance for the general Public and relevant authorities for lodging a complaint.

## 3. STANDARDS AND LEGISLATION

- 3.1. Protection of the Environment Operations Act 1997
- 3.2. Australian and New Zealand Standard Guidelines for complaint handling in organizations AS/NZS 10002:2014
- 3.3. NSW Ombudsman Effective complaint handling guidelines, 2nd Edition, December 2010

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## 4. DEFINITIONS

### 4.1. Complaint;

- a) A complaint means an expression of dissatisfaction made to or about us, our site, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.
- b) A complaint covered by this procedure can be distinguished from:
  - i. Workplace participant grievances;
  - ii. Public interest disclosures made by LHHT workplace participants;
  - iii. Code of conduct complaints;
  - iv. Responses to requests for feedback about the standard of our service provision, see point 4.4 and 5.5 'feedback'.
  - v. Reports of problems or wrongdoing merely intended to bring a problem to LHHT's notice with no expectation of a response, see point 4.4 and 5.5 'feedback';
  - vi. Requests for information.

### 4.2. Complaint management system;

- a) All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

### 4.3. Dispute;

- a) An unresolved complaint escalated either within or outside of our organisation.

### 4.4. Feedback;

- a) Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about LHHT, about our site, services or complaint handling where a response is not explicitly or implicitly expected or legally required.

### 4.5. Grievance;

- a) A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

4.6. **Policy;**

- a) The Quality, Safety and Environmental Statements set out how we should fulfill our vision, mission and goals.

4.7. **Public interest disclosure;**

- a) A report about wrongdoing made by a Public official in New South Wales that meets the requirements of the Public Interest Disclosures Act 1994.

**5. PROCEDURE**

5.1. **How a complaint can be made;**

- a) If you are dissatisfied with any aspect of the LHHT site or a service provided, you should in the first instance consider speaking directly with the workplace participant you have been dealing with.
- b) If you have not been dealing with a workplace participant or you are uncomfortable with the workplace participant or consider the workplace participant unable to address your concerns, please make contact by one of the following methods;

NO	METHOD	CONTACT
1	Telephoning	(02) 6853 3185 (After Hours) 0492 963 040
2	Writing	PO Box 270, Forbes 2871
3	Emailing	Forbes@lorishassall.com.au
4	In person by speaking to any of LHHT office staff	812 Parkes Road, Forbes, NSW 2871

- c) If we receive your complaint verbally and we consider it appropriate, we may ask you to put your complaint in writing.
- d) We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

5.2. **The information you need to tell us;**

- a) When we are investigating your complaint, we will be relying on information provided by you and information we may already have on hand.
- b) We may need to contact you to clarify details or request additional information where necessary.

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- c) To help us investigate your complaint quickly and efficiently we will ask you for the following information:
    - i. Your name and contact details,
    - ii. The nature of the complaint,
    - iii. Any previous history to the complaint.
    - iv. Copies of any documentation which supports your complaint.

**5.3. Help when making a complaint;**

- a) The workplace participant receiving or managing your complaint should provide you with the necessary assistance.
- b) However, in the event you consider you require further assistance please contact the LHHT Office Administrator on (02) 6853 3185 who can direct you to the appropriate Senior Manager if required.

**5.4. Recording of complaints;**

- a) When receiving a complaint, LHHT will record your name and contact details.
- b) LHHT will record all details of your complaint including the facts and the cause/s, the outcome and any actions taken following the investigation of your complaint.
- c) LHHT will record all dates and times relating to actions taken to resolve the complaint and communications between both parties.
- d) As part of LHHT's continual improvement plan, complaints will be monitored to identify trends for rectification and/or remedial actions required to mitigate any identified issues.
- e) If you lodge a complaint, we will record your personal information solely for the purposes of addressing your complaint. Your personal details will actively be protected from disclosure unless you expressly consent to it otherwise.
- f) Where a third party requests the details of the complaint and we are legally obligated to provide those details, the complaint details and resulting investigation will be provided to that authority.
- g) All complaints will be held on file for a minimum of 4 years.

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5.5. **Feedback;**

- a) LHHT is committed to resolving your issues at the first point of contact, however, this will not be possible in all circumstances, in which case a more formal complaints process will be followed.
- b) LHHT will acknowledge receipt of your complaint within 48 hours. Once your complaint has been received, we will undertake an initial review of your complaint.
- c) There may be circumstances during the initial review or investigation of your complaint where we may need to clarify certain aspects of your complaint or request additional documentation from you. In such circumstances we will explain the purpose of seeking clarification or additional documentation and provide you with feedback on the status of your complaint at that time.
- d) We are committed to resolving your complaint within 10 business days of you lodging your complaint, however, this may not always be possible on every occasion. Where we have been unable to resolve your complaint within 10 business days, we will inform you of the reason for the delay and specify a date when we will be in a position to finalise your complaint.
- e) Once we have finalised your complaint, we will advise you of our findings and any action we have taken. We will do this in writing, unless it has been mutually agreed that we can provide it to you verbally.
- f) You have the right to make enquiries about the current status of your complaint at any time by contacting us.

5.6. **LHHT 7-Point complaint handling process;**

NO	PROCESS	
1	<b>We Acknowledge</b>	Within 48 Hours of receiving your complaint we will acknowledge receipt of your complaint.
2	<b>We Review</b>	We undertake an initial review of your complaint and determine what if any additional information or documentation may be required to complete an investigation. We may need to contact you to clarify details or request additional information where necessary.
3	<b>We Investigate</b>	Within 10 business days of receiving your complaint we will investigate your complaint objectively and impartially, by considering the information you have provided us, our actions in relation to your dealings with us and any other information which may be available, that could assist us in investigating your complaint.
4	<b>We Respond</b>	Following our investigation, we will notify you of our findings and any actions we may have taken in regard to your complaint.
5	<b>We Take Action</b>	Where appropriate we amend our business practices or policies.
6	<b>We Record</b>	We will record and retain the details of your complaint for a period of 4 years your personal information will be recorded in accordance with relevant privacy legislation.
7	<b>We Evaluate</b>	Where a corrective action has been implemented, we will set a review date in order to evaluate the effectiveness of the corrective action and implement further controls if required.

5.7. **When you complain about one of our workplace participants;**

- a) If you complain about a workplace participant, we will treat your complaint confidentially, impartially, and equally (giving equal treatment to all parties involved).
- b) LHHT will investigate your complaint thoroughly by finding out the relevant facts, speaking with the relevant people and verifying explanations where possible.
- c) LHHT will treat the workplace participant objectively by:
  - i. Informing them of any complaint about their performance,
  - ii. Providing them with an opportunity to explain the circumstances,
  - iii. Providing them with appropriate support,
  - iv. Updating them on the complaint investigation and the result.

5.8. **Complaints under investigation by a regulator or law enforcement agency;**

- a) If your complaint is currently being investigated by the relevant federal, state or territory consumer protection regulator or law enforcement agency we may cease to take further action in relation to your complaint pending finalisation of their investigation.
- b) We will assist any agency with their investigations.

**5.9. Our complaint escalation process;**

- a) Where possible, LHHT will attempt to resolve your complaint at the first point of contact.
- b) If LHHT is unable to resolve your complaint at this stage, we will undertake an investigation of your complaint and provide you with the findings.
- c) If you are not satisfied with how your complaint has been handled, or the resolution provided by LHHT, you can request LHHT to escalate your complaint to the Plant Manager.
- d) If again you are not satisfied with the outcome your complaint, it can then be referred to the following appropriate government authority:

NO	APPROPRIATE AUTHORITY	CONTACT
1	Forbes Shire Council	(02) 6850 2300
2	EPA	13 15 55
3	Australian Competition and Consumer Commission (ACCC)	1300 302 502

**6. MONITORING OF THE COMPLAINT MANAGEMENT SYSTEM**

6.1. We will continually monitor our complaint management system to:

- a) Ensure its effectiveness in responding to and resolving complaints, and
- b) Identify and correct deficiencies in the operation of the system.
- c) Monitoring may include the use of audits and complaint satisfaction surveys.

6.2. We are committed to improving the effectiveness and efficiency of our complaint management system.

To this end, we will:

- a) Support the making and appropriate resolution of complaints
- b) Implement best practices in complaint handling
- c) Recognise and reward exemplary complaint handling by workplace participants
- d) Regularly review the complaints management system and complaint data, and
- e) Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

**7. VARIATIONS**

7.1. LHHT reserves the right to vary, replace or terminate this Procedure if legislation or other references change or, as a minimum, 3 years from last review date.

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**8. REFERENCES**

- 8.1. Environmental Policy
- 8.2. Quality Assurance Policy
- 8.3. Work Health and Safety Policy
- 8.4. EF02 – Pollution and Odour Complaints Form
- 8.5. IF14 – Incident and Investigation Report Form
- 8.6. EPL 12765



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**9. DOCUMENT HISTORY**

VERSION	DATE	SUMMARY OF CHANGES	TRAINING REQUIRED
Ver 1	30 Sep 2020	Initial	Y
Ver 1.1	17 Jun. 21	Changed to LHHT	Y