

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 considerate of 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 10002:2022
- 3.3. NSW Ombudsman Effective complaint handling guidelines, 3rd Edition, February 2017

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, Environmental and Social Responsibility Policy Statements set out how LHHT should fulfill its vision, mission, and goals.

4.7. **Complainant;**

- a) A person, organisation, or their representative making a complaint.

5. PROCEDURE

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

- a) If a complainant is dissatisfied with any aspect of the LHHT site or a service provided, contact should be made with the workplace participant that is the complainant’s usual direct contact.
- b) If a complainant has not been dealing with a workplace participant or is uncomfortable with the workplace participant or consider the workplace participant unable to address concerns, contact can be made 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 LHHT receive the complaint verbally and it is considered appropriate, LHHT may ask the complainant to put the complaint in writing.
- d) LHHT 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 LHHT;

- e) When LHHT are investigating the complaint, LHHT will be relying on information provided by the complainant and information LHHT may already have on hand.
- f) LHHT may need to contact the complainant to clarify details or request additional information where necessary.
- g) To help LHHT investigate the complaint quickly and efficiently LHHT will ask the complainant for the following information:
 - i. Name and contact details,
 - ii. The nature of the complaint,
 - iii. Any previous history to the complaint.
 - iv. Copies of any documentation which supports the complaint.

5.3. Help when making a complaint;

- h) The workplace participant receiving or managing your complaint should provide you with the necessary assistance.
- i) However, in the event the complainant consider that 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;

- j) When receiving a complaint, LHHT will record the name and contact details.
- k) LHHT will record all details of the complaint including the facts and the cause/s, the outcome and any actions taken following the investigation of the complaint.
- l) LHHT will record all dates and times relating to actions taken to resolve the complaint and communications between both parties.
- m) 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.
- n) If the complainant lodges a complaint, LHHT will record the personal information solely for the purposes of addressing the complaint. The personal details will actively be protected from disclosure unless the complainant expressly consent to it otherwise.
- o) Where a third party requests the details of the complaint if LHHT is legally obligated to provide those details, the complaint details and resulting investigation will be provided to that authority.
- p) All complaints will be held on file for a minimum of 4 years.

5.5. Feedback;

- a) LHHT is committed to resolving the 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 the complaint within 48 hours. Once the complaint has been received, LHHT will undertake an initial review of the complaint.
- c) There may be circumstances during the initial review or investigation of the complaint where LHHT may need to clarify certain aspects of the complaint or request additional documentation from the complainant. In such circumstances LHHT will explain the purpose of seeking clarification or additional documentation and provide the complainant with feedback on the status of the complaint at that time.
- d) LHHT are committed to resolving complaints within 10 business days of the lodging of complaint, however, this may not always be possible on every occasion. Where LHHT have been unable to resolve a complaint within 10 business days, LHHT will inform the complainant of the reason for the delay and specify a date when LHHT will be in a position to finalise the complaint.
- e) Once LHHT have finalised a complaint, LHHT will advise the complainant of the findings and any action taken. This shall be communicated in writing unless it has been mutually agreed that LHHT can provide it verbally.
- f) The complainant has the right to make enquiries about the current status of a complaint at any time by contacting LHHT.

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

NO	PROCESS	
1	Acknowledge	Within 48 Hours of receiving the complaint LHHT will acknowledge receipt of the complaint.
2	Review	LHHT undertake an initial review of the complaint and determine what if any additional information or documentation may be required to complete an investigation. LHHT may need to contact the complainant to clarify details or request additional information where necessary.
3	Investigate	Within 10 business days of receiving the complaint LHHT will investigate the complaint objectively and impartially, by considering the information the complainant has provided LHHT, LHHT actions in relation to the dealings with LHHT and any other information which may be available, that could assist LHHT in investigating the complaint.
4	Respond	Following LHHT investigation, LHHT will notify the complainant of LHHT findings and any actions LHHT may have taken in regard to the complaint.
5	Act	Where appropriate LHHT amend LHHT business practices or policies.
6	Record	LHHT will record and retain the details of the complaint for a period of 4 years the personal information will be recorded in accordance with relevant privacy legislation.
7	Evaluate	Where a corrective action has been implemented, LHHT 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 a complaint is received about a workplace participant, LHHT will treat the complaint confidentially, impartially, and equally (giving equal treatment to all parties involved).
- b) LHHT will investigate the 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 the complaint is currently being investigated by the relevant federal, state or territory consumer protection regulator or law enforcement agency LHHT may cease to take further action in relation to the complaint pending finalisation of their investigation.
- b) LHHT will assist any agency with their investigations.

5.9. LHHT complaint escalation process;

- a) Where possible, LHHT will attempt to resolve the complaint at the first point of contact.
- b) If LHHT is unable to resolve the complaint at this stage, LHHT will undertake an investigation of the complaint and provide the complainant with the findings.
- c) If the complainant is not satisfied with how the complaint has been handled, or the resolution provided by LHHT, the complainant can request LHHT to escalate the complaint to the General Manager.
- d) If again the complainant is not satisfied with the outcome the 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	Fairwork Ombudsman	13 14 50
4	Safework NSW	13 10 50

6. MONITORING OF THE COMPLAINT MANAGEMENT SYSTEM

6.1. LHHT will continually monitor LHHT 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. LHHT are committed to improving the effectiveness and efficiency of LHHT complaint management system. To this end, LHHT 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 LHHT 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.

8. REFERENCES

- 8.1. PS03 - Environmental Policy Statement
- 8.2. PS06 - Quality Assurance Policy Statement
- 8.3. PS11 - WHS Policy Statement
- 8.4. P22 - WHS Policy
- 8.5. ER1.2 - Pollution and Odour Complaints Register
- 8.6. EF02 – Pollution and Odour Complaints Form
- 8.7. IF08 - Non-Conformance Report
- 8.8. IF14 – Incident and Investigation Report Form
- 8.9. Environmental Protection License 12765

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
Ver 2	23 Nov 23	Scheduled review, updated all wording to included complainant, added additional authorities, updated referencing,	