



Lumea

# Snowy 2.0 TCP Complaints Management System

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## Contents

<b>1. Complaints Management System (CMS)</b> .....	<b>3</b>
1.1 Background .....	3
1.2 Purpose.....	3
<b>2. Complaints management</b> .....	<b>4</b>
2.1 Facilities for receiving complaints.....	4
2.2 Registration of Complaints.....	4
2.2.1 Register reporting. ....	5
2.2.2 Register review. ....	5
2.3 Responding to complaints .....	5
2.4 Complaint escalation procedure .....	6
2.4.1 Mediation .....	6
2.4.2 Unreasonable or habitual complaints.....	6
<b>3. Appendix</b> .....	<b>7</b>
3.1 Sample complaints register.....	7

# 1. Complaints Management System (CMS)

## 1.1 Background

This Complaints Management System (CMS) has been prepared for the Snowy 2.0 Transmission Connection Project (**the Project**). The document outlines the approach adopted to handling complaints related to the Project.

This document should be read in conjunction with the Community and Stakeholder Management Plan, which outlined the process to be used in responding to complaints.

## 1.2 Purpose

The purpose of this CMS is to address the requirements of Condition of Approval (CoA) C11 as it relates to complaints management.

Table 1-1: Condition applicable to the Complaints Management System

CoA	Requirement
C 11. Access to Information	<p>The Proponent must:</p> <ul style="list-style-type: none"> <li>a. make the following information and documents publicly available on its website as relevant to the stage of the development. <ul style="list-style-type: none"> <li>i. how complaints about the development can be made; and</li> </ul> </li> <li>b. keep such information up to date.</li> </ul>

The Complaints Management System:

- details the process for receiving, managing and resolving the various forms of complaints and feedback from the community,
- outlines the communication process for addressing and resolving complaints and minimising the chance of recurrence, and
- outlines the process of escalation and mediation.

This CMS applies to all complaints directed to Transgrid Group staff, UGL and subcontractors relating to the Project. The CMS will be implemented and maintained for the duration of the Project and for a minimum of 12 months following completion of construction.

## 2. Complaints management

The following section outlines the approach to managing complaints received during the Project and for 12 months following completion of the project.

A 'complaint' is defined as an interaction with a community member or stakeholder who expresses dissatisfaction with construction activities, staff members, actions or proposed actions.

### 2.1 Facilities for receiving complaints.

Table 2-1 summarises the facilities established by Lumea for receiving complaints relating to the Project.

Table 2-1: Facilities for receiving enquiries and complaints.

Facility	Purpose	Detail
Community information line	The 1800 telephone number for the registration of complaints about the works 24 hours a day, 7 days a week	1800 674 022 (toll free)
Email address	The email address allows stakeholders and the community to transmit electronic complaints about the works	<a href="mailto:community@lumea.com.au">community@lumea.com.au</a>
Postal Address - Project	The postal address allows stakeholders and the community to send written complaints about the works	Snowy 2.0 TCP Lumea 180 Thomas St Sydney NSW 2000
Direct verbal or written referral from Transgrid or UGL	Complaints directed to Transgrid, UGL or subcontractors can be escalated to Lumea for resolution where appropriate	Direct to Lumea Community Manager

The telephone number, postal address and email address will be published in the Tumut and Adelong Times and the Tumbarumba Times prior to the project starting. Information is provided on the Project webpage (<https://www.lumea.com.au/projects/snowy-2-0-tcp>) and will also be made available via social media platforms where appropriate. These contact facilities will be available for the duration of the project and for one year following completion of construction.

### 2.2 Registration of Complaints

All community complaints relating to the Project are recorded in the Consultation Manager (CM) database system. CM is used to track the recording, investigation and handling of all community and stakeholder complaints relating to the project works.

The following details are recorded:

- date and time of complaint.
- type of communication (telephone, letter, email etc),

- name, address, contact telephone number of contact or, if no details were provided, a note to that effect.
- nature of the complaint and issues raised.
- record of operational and meteorological conditions contributing to the comment or complaint as relevant.
- the number of people affected in relation to the complaint.
- actions taken in response including follow up contact.
- details of whether resolution was reached.
- any monitoring to confirm that the complaint was satisfactorily resolved.

Lumea Community Engagement Manager (CEM) and UGL Site Administrator are responsible for maintaining a Complaints Register for the Project.

### 2.2.1 Register reporting.

Information contained in Consultation Manager, including the number of complaints received, will be summarised in a monthly report. The report will be made available to the Environmental Representative (ER) and Project Manager at the end of each calendar month or as required.

### 2.2.2 Register review.

Complaints recorded in Consultation Manager will be reviewed and summarised in a monthly report to:

- ensure records are complete and actioned on a timely basis
- identify trends and initiate preventive action and proactive strategies.

## 2.3 Responding to complaints

All complaints will be reviewed by Lumea and UGL, allocated to the appropriate personnel, responded to, and corrective or preventative action will be initiated. The target response times are summarised in Table 2-2.

Table 2-2: Target response times for addressing complaints.

Complaint classification	Summary	Timing
Phone call or personal contact	During standard construction hours and during out of construction hours (when construction work is occurring)	Verbal response immediately (if possible) to determine the nature of the complaint and at least within two hours if possible.
	Out of standard construction hours (when no construction is occurring)	Verbal response within 24 hours (if possible).
Written complaint (email, text or letter)	Any written complaint from the community or a stakeholder	Written response as soon as possible but within five working days unless otherwise agreed with Lumea and the stakeholder.

All telephone complaints received during standard construction hours and during out of hours work will be answered by Lumea's nominated representative.

Outside of these hours (when no construction work is occurring), callers to the 1800 number will be directed to leave a message for a return call from the Lumea representative during business hours on the next

workday. During construction, UGL will notify Lumea of any complaints that are anticipated to require longer than five days to resolve. Lumea will be notified at least within two hours of any complaint or issue that has the potential to attract media or political attention. The CEM will document all complaints and ensure that all required follow up action is completed. Lumea will be advised of any complaint that needs to be escalated or is related to Lumea or Transgrid matters not related to the Project.

## **2.4 Complaint escalation procedure**

Lumea and UGL will endeavour to achieve prompt resolution of matters with fairness, care and understanding. Should there be a failure to come to a satisfactory resolution of a complaint, a response will be provided to the complainant in writing within five business days of receipt of the complaint. If deemed to be required by the CEM and the Environmental Representative (ER), the issue will be escalated to the Project Manager for further advice.

If the complaint is not resolved by the Project Manager, an external review option is available by escalating the complaint to the Lumea GM Corporate Affairs and Lumea Risk Manager.

Where a complaint still cannot be resolved to the satisfaction of the complainant, an assessment will be conducted in consultation with the ER to determine whether the complaint is deemed reasonable or unreasonable.

Complaints confirmed by the ER as being reasonable will be subject to mediation. If mediation is required, an independent mediator will be engaged (refer Section 2.4.1).

Complaints determined by the ER to be unreasonable will be subject to the guidelines in Managing Unreasonable Complainant Conduct (NSW Ombudsman 2012) - (refer Section 2.4.2).

### **2.4.1 Mediation**

Mediation is a formal process through which an independent person, referred to as a mediator, is engaged to facilitate a negotiation between two parties and come to an equitable solution agreeable to both parties. If a complaint is not resolved in the normal process, the complainant will be advised of the opportunity to seek mediation. Lumea and/or UGL representatives will attend the mediation as required.

### **2.4.2 Unreasonable or habitual complaints**

According to the NSW Ombudsman's guidelines, unreasonable complaint conduct is defined as any conduct which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to the complaint. Lumea does not anticipate that there will be a significant number of complainants who exhibit this type of behaviour. However, any that do arise have the potential to negatively impact on the project team's resources and efficiency, as well as on the safety and wellbeing of individual team members and the complainants themselves. To manage unreasonable complaint conduct, Lumea will follow the process and procedures as outlined in Managing Unreasonable Complaint Conduct (NSW Ombudsman, 2012).

## Appendix

### Sample complaints register.

Sample of reporting template that can be generated from the Consultation Manager system.

ID Number	Contact Date	Stakeholder name	Location	Issue Type	Response	Monitoring required yes/no