

Appendix 6 Code of Practice for Complaints Handling

Note

The Codes of Practice are generally applied in relation to small retail customers. For Darling Quarter, VWS does not have any small retail customers; only one large customer (JLL). Notwithstanding, VWS codes of practice developed for all existing and proposed sewerage services and recycle water project will be generally applied as a matter of good business practice and governance

PURPOSE

This code of practice provides a guideline for complaints handling (including the preparation of related procedures) by management and employees of Veolia Water Solutions & Technologies (Australia) Pty Ltd (VWS) in relation to its Recycled Water Services as Recycled Water Network Operator and Retail Supplier Licences for the Darling Quarters Development pursuant to the Water Industry Competition (General) Regulation 2008, Schedule 2, Part 1, Cl 4.

This code of practice is for VWS internal use only; a short version has been made available to its sole Customer (JLL).

BACKGROUND

VWS has been contracted by JLL to supply recycle water services for the Darling Quarters Development.

VWS commits to provide these services in accordance with the code of practice described in this appendix prepared by VWS as licence holder. VWS will be responsible for customer communication, complaints handling and debt recovery. The split of responsibility is as follows:

- ☐ VWS - All operational related customer interface matters
- ☐ JLL - All financial related customer interface matters including tariff setting and debt recovery (knowing that JLL is the customer and also asset owner representative and as such it will need to deal with itself in relation to any financial related customer interface matter)

LICENCE HOLDER OBLIGATION

Pursuant to the above Regulation, VWS shall:

- (a) establish and comply with a code of practice for customer complaints, whether in relation to:
 - i. the supply of water, or the provision of sewerage services, by the licensee, or
 - ii. the operation of the water or sewerage infrastructure from which that water is supplied or those services provided, and
 - iii. establishment of a procedure for notifying NSW Health during the development of (and any amendment of) a procedure for notifying NSW Health of Health related complaints, agreed to by NSW Health, in the Retail Supply Management Plan, if and as applicable and
- (b) provide copies of that code of practice to the Minister, IPART and to the ombudsman (EWON), if and as applicable and
- (c) keep its customers informed as to:
 - i. the provisions of that code of practice, and
 - ii. the existence of the ombudsman, and the procedure for referring complaints or disputes to the ombudsman, and
- (d) furnish periodic reports to the Minister and IPART, in relation to the complaints it receives, in such form, and containing such information, as the Minister or IPART requires.

REFERENCE STANDARD

This code of practice conforms to and takes from AS/ISO 10002—2014 Customer Satisfaction; Guidelines for complaints handling in organisations, as published by Standards Australia.

DEFINITIONS

The reference standard definitions follow, edited specifically to this Plan and Licence

Complainant

JLL as sole customer

Complaint

Expression of dissatisfaction made to VWS, related to its products (namely recycled water supply), or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected

Customer

JLL as sole customer

GUIDING PRINCIPLES

Visibility

Information about how and where to complain shall be well publicised to the sole customer (JLL).

Accessibility

VWS complaints handling process shall be easily known to the sole complainant (JLL). Information shall be made available on the details of making and resolving complaints. The complaints handling process and supporting information shall be easy to understand and use.

Responsiveness

Receipt of each complaint shall be acknowledged to the complainant immediately. Complaints shall be addressed promptly in accordance with their urgency. For example, significant health and safety issues shall be processed immediately. The complainants shall be treated courteously and be kept informed of the progress of their complaint through the complaints handling process.

Objectivity

Each complaint shall be addressed in an equitable, objective and unbiased manner through the complaints handling process.

Charges

Access to the complaints handling process shall be free of charge to the complainant.

Confidentiality

Personally identifiable information concerning the complainant shall be available where needed, but only for the purposes of addressing the complaint within VWS and shall be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure.

Customer-focused approach

VWS shall adopt a customer-focused approach, shall be open to feedback including complaints, and shall show commitment to resolving complaints by its actions.

Accountability

VWS shall ensure that accountability for and reporting on the actions and decisions of VWS with respect to complaints handling is clearly established.

Continual improvement

The continual improvement of the complaints handling process and the quality of products shall be a permanent objective of VWS.

COMPLAINTS HANDLING FRAMEWORK

Commitment

VWS is actively committed to effective and efficient complaints handling.

Policy

VWS is committed to customer focused complaints handling practices.

Responsibility and authority

Top management shall be responsible for the following:

- ☐ ensuring that the complaints handling process and objectives are established;
- ☐ ensuring that the complaints handling process is planned, designed, implemented, maintained and continually improved;
- ☐ identifying and allocating the management resources needed for an effective and efficient complaints handling process;
- ☐ ensuring the promotion of awareness of the complaints handling process and the need for a customer focus throughout VWS;
- ☐ ensuring that information about the complaints handling process is communicated to the sole customer JLL in an easily accessible manner;
- ☐ establishing a resource as a complaints handling management representative and clearly defining his or her responsibilities and authority in addition to the responsibilities and authority set out below;
- ☐ ensuring that there is a process for rapid and effective notification to top management of any significant complaints;
- ☐ periodically reviewing the complaints handling process to ensure that it is effectively and efficiently maintained and continually improved.

The complaints handling management representative shall be responsible for the following:

- ☐ establishing a process of performance monitoring, evaluation and reporting;
- ☐ reporting to top management on the complaints handling process, with recommendations for improvement;
- ☐ maintaining the effective and efficient operation of the complaints handling process, including the recruitment and training of appropriate personnel, technology
- ☐ requirements, documentation, setting and meeting target time limits and other requirements, and process reviews.

Other managers involved in the complaints handling process shall, as applicable within their area of responsibility, be responsible for the following:

- ☐ ensuring that the complaints handling process is implemented;
- ☐ liaising with the complaints handling management representative;
- ☐ ensuring the promotion of awareness of the complaints handling process and of the need for a customer focus;
- ☐ ensuring that information about the complaints handling process is easily accessible;
- ☐ reporting on actions and decisions with respect to complaints handling;
- ☐ ensuring that monitoring of the complaints handling process is undertaken and recorded;
- ☐ ensuring that action is taken to correct a problem, prevent it happening in the future, and that the event is recorded;
- ☐ ensuring that complaints handling data are available for the top management review.

All personnel in contact with the customer and complainant (JLL) shall

- ☐ be trained in complaints handling,
- ☐ comply with any complaints handling reporting requirements determined by VWS,
- ☐ treat customer in a courteous manner and promptly respond to their complaints or direct them to the appropriate individual, and
- ☐ show good interpersonal and good communication skills.

All personnel shall

- ☐ be aware of their roles, responsibilities and authorities in respect of complaints,
- ☐ be aware of what procedures to follow and what information to give to complainants, and
- ☐ report complaints which may have a significant impact on VWS.

PLANNING AND DESIGN

Objectives

Top management shall ensure that the complaints handling objectives are established for relevant functions and levels within VWS. These objectives shall be measurable and consistent with the complaints handling policy. These objectives shall be set at regular intervals as detailed performance criteria.

Activities

Top management shall ensure that the planning of the complaints handling process is carried out in order to maintain and increase customer satisfaction.

Resources

In order to ensure that the complaints handling process operates effectively and efficiently, top management shall assess the needs for resources and provide them. These include resources such as personnel, training, procedures, documentation, specialist support, materials and equipment, computer hardware and software, and finances.

OPERATION OF COMPLAINTS-HANDLING PROCESS

Communication

Information concerning the complaints handling process shall be made readily available to customers, complainants and other interested parties including:

- ☐ where complaints can be made;
- ☐ how complaints can be made;
- ☐ information to be provided by the complainant;
- ☐ the process for handling complaints;
- ☐ time periods associated with various stages in the process;
- ☐ the complainant's options for remedy, including external means;
- ☐ how the complainant can obtain feedback on the status of the complaint.

Receipt of complaint

Upon reporting of the initial complaint, the complaint shall be recorded with supporting information and a unique identifier code. The record of the initial complaint shall identify the remedy sought by the complainant and any other information necessary for the effective handling of the complaint including the following:

- ☐ a description of the complaint and relevant supporting data;
- ☐ the requested remedy;

- ☐ the products or practices complained about;
- ☐ the due date for a response;
- ☐ data on people, department, branch, organization and market segment;
- ☐ Immediate action taken (if any).

Tracking of complaint

The complaint shall be tracked from initial receipt through the entire process until the complainant is satisfied or the final decision is made. An up-to-date status shall be made available to the complainant upon request and at regular intervals, at least at the time of preset deadlines.

Acknowledgement of complaint

Receipt of each complaint shall be acknowledged to the complainant immediately (for example via post, phone or e-mail).

Initial assessment of complaint

After receipt, each complaint shall be initially assessed in terms of criteria such as severity, safety implication, complexity, impact, and the need and possibility of immediate action.

Investigation of complaints

Every reasonable effort shall be made to investigate all the relevant circumstances and information surrounding a complaint. The level of investigation shall be commensurate with the seriousness, frequency of occurrence and severity of the complaint.

Response to complaints

Following an appropriate investigation, VWS shall offer a response, for example correct the problem and prevent it happening in the future. If the complaint cannot be immediately resolved, then it shall be dealt with in a manner intended to lead to its effective resolution as soon as possible.

Communicating the decision

The decision or any action taken regarding the complaint, which is relevant to the complainant or to the personnel involved, shall be communicated to them as soon as the decision or action is taken.

Closing the complaint

If the complainant accepts the proposed decision or action, then the decision or action shall be carried out and recorded. If the complainant rejects the proposed decision or action, then the complaint shall remain open. This shall be recorded and the complainant shall be informed of alternative forms of internal and external recourse available. VWS shall continue to monitor the progress of the complaint until all reasonable internal and external options of recourse are exhausted or the complainant is satisfied.

MAINTENANCE AND IMPROVEMENT

Collection of information

VWS shall record the performance of its complaints handling process. VWS shall establish and implement procedures for recording complaints and responses and for using these records and managing them, while protecting any personal information and ensuring the confidentiality of complainant. This shall include the following:

- ☐ specifying steps for identifying, gathering, classifying, maintaining, storing and disposing of records;
- ☐ recording its handling of a complaint and maintaining these records, taking utmost care to preserve such items as electronic files;
- ☐ keeping records of the type of training and instruction that individuals involved in the complaints handling process have received; if and as necessary;
- ☐ specifying VWS's criteria for responding to requests for record presentation and record

submissions made by a complainant or his or her agent; this may include time limits, what kind of information will be provided, to whom, or in what format;

- ☐ specifying how and when statistical non-personally identifiable complaints data are disclosed to the public.

Analysis and evaluation of complaints

All complaints shall be classified and then analysed to identify systematic, recurring and single incident problems and trends, and to help eliminate the underlying causes of complaints.

Satisfaction with the complaints handling process

There shall be regular action taken to determine the levels of satisfaction of complainants with the complaints handling process. This may take the form of random surveys of complainants and other techniques.

Monitoring of the complaints handling process

Monitoring of the complaints handling process, the resources required (including personnel) and the data to be collected shall be undertaken.

Auditing of the complaints handling process

VWS shall regularly perform or provide internal audits in order to evaluate the performance of the complaints handling process. The audit shall provide information on

- ☐ process conformity to complaints handling procedures, and
- ☐ process suitability to achieve complaints handling objectives.

The complaints handling audit may be conducted as part of VWS quality management system audit. The audit results shall be taken into account in the management review to identify problems and introduce improvements in the complaints handling process. The audit shall be carried out by competent individuals independent of the activity being audited.

Management review of the complaints handling process

Top management of VWS shall review the complaints handling process on a regular basis (annually or as otherwise required) in order to:

- ☐ ensure its continuing suitability, adequacy, effectiveness and efficiency,
- ☐ identify and address instances of non-conformity with health, safety, environmental, customer, regulatory and other legal requirements,
- ☐ identify and correct product deficiencies,
- ☐ identify and correct process deficiencies,
- ☐ assess opportunities for improvement and the need for changes to the complaints handling process and products offered, and
- ☐ evaluate potential changes to the complaints handling policy and objectives.

The input to management review may include information on:

- ☐ internal factors such as changes in the policy, objectives, organizational structure, resources available, and products offered or provided,
- ☐ external factors such as changes in legislation, competitive practices or technological innovations,
- ☐ the overall performance of the complaints handling process, including customer satisfaction surveys and the results of the continual monitoring of the process,
- ☐ the results of audits,
- ☐ the status of corrective and preventive actions,
- ☐ follow up actions from previous management reviews, and
- ☐ recommendations for improvement.

The output from the management review may include

- ☐ decisions and actions related to improvement of the effectiveness and efficiency of the complaints handling process,

- ☐ proposals on product improvement, and decisions and actions related to identified resource needs.

Records from management review shall be maintained and used to identify opportunities for improvement.

Continual improvement

VWS shall continually improve the effectiveness and efficiency of the complaints handling process. As a result, VWS can continually improve the quality of its products and service. This can be achieved through corrective and preventive actions and innovative improvements. VWS shall take action to eliminate the causes of existing and potential problems leading to complaints in order to prevent recurrence and occurrence, respectively. VWS shall

- ☐ explore, identify and apply best practices in complaints handling,
- ☐ foster a customer-focused approach within VWS,
- ☐ encourage innovation in complaints handling development, and
- ☐ recognise exemplary complaints handling behaviour.

RECOURSE TO FURTHER ACTION

In the event a customer is not satisfied with the handling of their complaint by VWS, VWS shall direct the customer to the Energy and Water Ombudsman of NSW (EWON) should they wish to take further action.

REFERENCES

- ☐ VWS Corporate Complaints handling Policy
- ☐ (Note: CF04 is for VWS internal complaints; but is easily adaptable to external events)
- ☐ Complaints Handling Administration Procedure
 - Complaint Form – external use
 - Complaint Follow-up Form – internal use (to be prepared case to case)
- ☐ Performance Monitoring
- ☐ Training Program; if and as necessary
- ☐ Internal VWS Audit (as per BR14 Auditing Procedure)

TECHNICAL COMPLAINT PROCESS*

*** Current Call Toll Free No: 1300 726 678 (if 0407 867 157 is not answering)**

Email Address: info@myrecycledwater.com.au

Courteous receipt of call:

1. Call centre records time of call AEST
2. First of all we shall need to record your name, address and contact phone number and email:
 - a) Name
 - b) Address
 - c) Phone number at home and mobile
 - d) Email address
 - e) What is the most suitable number to call you back and at what time?
3. To help us understand your complaint for us to resolve the matter as efficiently as possible is your complaint in connection with one of the following:
 - a) Recycled Water Collection issues
 - b) Sewer (Feed to the plant)
 - c) Recycle Water Treatment Plant
 - d) None of the above
4. If your complaint refers to the Recycled Water, are you concerned about:
 - a) no recycle water available
 - b) low recycle water pressure
 - c) colour of the water
 - d) any odour
 - e) health Issues in relation to the recycled water
 - f) none of the above
5. If your complaint refers to the sewer, have you discussed this with Sydney Water, who (and now VWS) are responsible for supply of sewerage to the Plant:
 - a) Yes, but Sydney Water advised to contact VWS
 - b) Yes, Sydney Water is resolving the matter, but I want VWS also to get involved
 - c) health Issues in relation to the sewer network
 - d) don't know
6. If your complaint refers to the Recycle Water Treatment Plant, are you concerned about:
 - a) Security
 - b) noise
 - c) odour
 - d) Others such as H2S Alarm

FINANCIAL COMPLAINT PROCESS*

*** - Toll Free No: 1300 726 678 (if 0407 867 157 is not answering)**

Email: info@myrecycledwater.com.au

As JLL is the sole commercial customer for RWTP and also the asset owner's representative, and there is no financial transactions from JLL to any other customer (other than internal), other than fees to be payable by JLL to VWS in accordance with contract between VWS and JLL, financial complaint process is no applicable for this license.