

## OP8061 - Complaints Management Policy

Policy Owner	Executive Manager Customer Experience
Policy Author	Senior Lawyer Governance and Compliance
Supporting Legislation and Documents	<p>Australian Standard (AS ISO 10002-2006 Customer Satisfaction – Guidelines for complaints handling in organisations)</p> <p><a href="#">Crime and Corruption Act 2001 (Qld)</a> – (CAC Act)</p> <p><a href="#">Public Interest Disclosure Act 2010 (Qld)</a> – (PID Act)</p> <p><a href="#">Energy and Water Ombudsman Act 2006 (Qld)</a></p> <p><a href="#">Public Records Act 2023 (Qld)</a></p> <p><a href="#">Human Rights Act 2019 (Qld)</a></p>
Documents Directly Related	<p><a href="#">OP10971</a> - Unitywater’s Customer Charter</p> <p><a href="#">BP8043</a> - Public Interest Disclosure Policy</p> <p><a href="#">OP10733</a> - Human Rights Policy</p> <p><a href="#">Pr8159</a> - Manage Complaints Procedure</p> <p><a href="#">Pr8021</a> - Complaints of Corrupt Conduct Against the CEO Procedure</p> <p><a href="#">Pr9671</a> - Public Interest Disclosure Procedure</p> <p><a href="#">Pr10751</a> - Grievance Procedure</p>

## 1. Policy Statement

Unitywater is committed to maintaining a robust complaints management process that is accessible, transparent, and fair, valuing feedback as an opportunity for continuous improvement.

Complaints will be handled in a timely, confidential, and objective manner, treating complainants with respect while adhering to principles of natural justice and legislative requirements.

## 2. Purpose and Objectives

The purpose of this Policy is to outline the principles and responsibilities for the management of complaints.

Unitywater will resolve complaints through various branches depending on the particular matter. The management of the various types of complaint are detailed below. Where team members are unsure where to direct a complaint then they are to consult the Customer Relationships Section who will categorise it and ensure it is managed through the correct complaint management channel.

A summary of the complaint management channels is at Attachment 1. The complaint procedures indicated in the references can be found on the intranet.

### 2.1 Complaint types and their management channel

- a) If a complaint is of a disclosure nature, or has the potential to be so, then it must be directed to the Senior Lawyer Governance and Compliance unless implicated in which case it must be directed to General Counsel Company Secretary. Refer to Public Interest Disclosure Policy and Procedure for guidance.
- b) If a complaint is made against an Executive Manager, it must be directed in the first instance to the CEO. The CEO will then refer management of the complaint to the Executive Manager People, Culture and Safety (EM PCS) unless the EM PCS is implicated in which case it must be directed to the General Counsel Company Secretary.

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If the complaint is of a disclosure nature, the Senior Lawyer Governance and Compliance and General Counsel Company Secretary shall be notified on referral of the complaint to the Executive Manager managing the complaint.

- c) Any complaints against the Unitywater Chairman or a Board member (including complaints that may be referred to the Crime and Corruption Commission (CCC)), are directed in the first instance to the CEO. The CEO will then refer management of the complaint to the General Counsel Company Secretary or any other suitably qualified person (refer Pr8021 - Complaints of Corrupt Conduct Against the CEO Procedure).
- d) Any complaints against the CEO (including complaints that may be referred to the CCC), are directed in the first instance to the Unitywater Chairman. The Chairman will then refer management of the complaint to the Executive Manager People, Culture and Safety or any other suitably qualified person.
- e) Any complaints against a Unitywater team member excluding the above, should first be sent to the Head of Customer Service who will gather relevant information. The complaint will then be passed directly to Head of People Capability and Shared Services for management.
- f) If a complainant is seeking compensation or re-imburement for damages suffered to their property or person relevant to a Unitywater insurance policy, then Head of Risk & Business Resilience is to be notified.
- g) If a complaint is about a procurement matter, e.g. a tender, then it must be directed to the Head of Procurement, unless this manager is implicated in the complaint in which case it should be referred to the Chief Financial Officer.
- h) If a complaint relates to a team member's personal grievance, then the complaint must be managed through the internal processes by the relevant manager or the manager once removed from the complainant, in accordance with Unitywater's Grievance Procedure.
- i) If a complaint relates to Privacy, i.e. a complaint lodged by an individual in relation to Unitywater's management of their personal information. A privacy complaint must be received in writing and will be managed by the Unitywater Privacy Officer. The Privacy Officer will respond to the complaint in writing and within 45 business days after the privacy complaint is received by Unitywater.
- j) All customer complaints will be managed by the Customer Relationships Section within the Customer Experience Business Unit in accordance with the Manage Complaints Procedure (Pr8159).

### 2.2 Complaint Management

The examination of all complaints will be undertaken on a formal basis and within any applicable statutory timeframes, this will commence with an assessment and the purpose of the assessment is:

- a) to confirm there is a basis for the complaint
- b) to confirm the nature (type) of the complaint
- c) to determine if the complaint requires referral to another section or greater investigation than provided in the initial assessment.

An investigation may be undertaken for more serious and/or complex complaints, particularly those of a 'disclosure' nature (refer BP8043 - Public Interest Disclosure Policy and Pr9671 - Public Interest Disclosure Procedure for more information).

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### 3. Policy Scope/Coverage

This Policy covers both internal and external complaints made to Unitywater and is applicable to all Unitywater team members.

### 4. Roles and Responsibility

#### 4.1 Board

The Board is responsible for ensuring that an appropriate mechanism is in place to encourage and manage all types of complaints in a professional, timely and effective manner.

#### 4.2 Chief Executive Officer

The Chief Executive Officer has principal responsibility for:

- a) Ensuring complaints are managed in accordance with this Policy which reflects relevant regulations and standards.
- b) Ensuring the Complaints Management Policy and supporting procedures are communicated to all relevant team members throughout the organisation.

#### 4.3 Executive Manager Customer Experience as Document Owner is responsible for:

- a) Conducting and/or delegating regular reviews to ensure this policy and related resources (e.g. procedures, forms, website content) remain fit for purpose, consistent and current.
- b) Approving this policy for publication (and/or seeking Board approval where required).
- c) Ensuring all relevant stakeholders and team members have been consulted and feedback is captured and actioned (where applicable).
- d) Ensuring appropriate communication and/or training is provided to relevant team members when implementing a new, amended or obsolete document (where applicable).
- e) Monitoring compliance with internal/external requirements (e.g. monitor legislation changes and assess/update this policy when required).

#### 4.4 Level 2, 3 and 4 Managers

Managers have responsibility for:

- a) Ensuring all complaints received within their area of responsibility are identified and managed in an unbiased and timely manner.
- b) Providing guidance and/or instructions to team members on complaints management.

#### 4.5 General Counsel Company Secretary

The General Counsel Company Secretary is responsible for:

- a) The role of Unitywater Crime and Corruption Commission Liaison Officer.
- b) The role of Public Interest Disclosure Coordinator (joint appointment with Senior Lawyer Governance and Compliance).
- c) The establishment and maintenance of Unitywater's panel of investigators.

#### 4.6 Senior Lawyer Governance and Compliance

The Senior Lawyer Governance and Compliance is responsible for the role of Public Interest Disclosure Coordinator (joint appointment with General Counsel Company Secretary).

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### 4.7 Privacy Officer

The Privacy Officer has responsibility for:

- a) Ensuring all referred privacy related complaints are managed in an unbiased manner to meet statutory timeframes.
- b) Providing guidance and advice to team members regarding privacy complaints management.

### 4.8 Team members

All team members are responsible for:

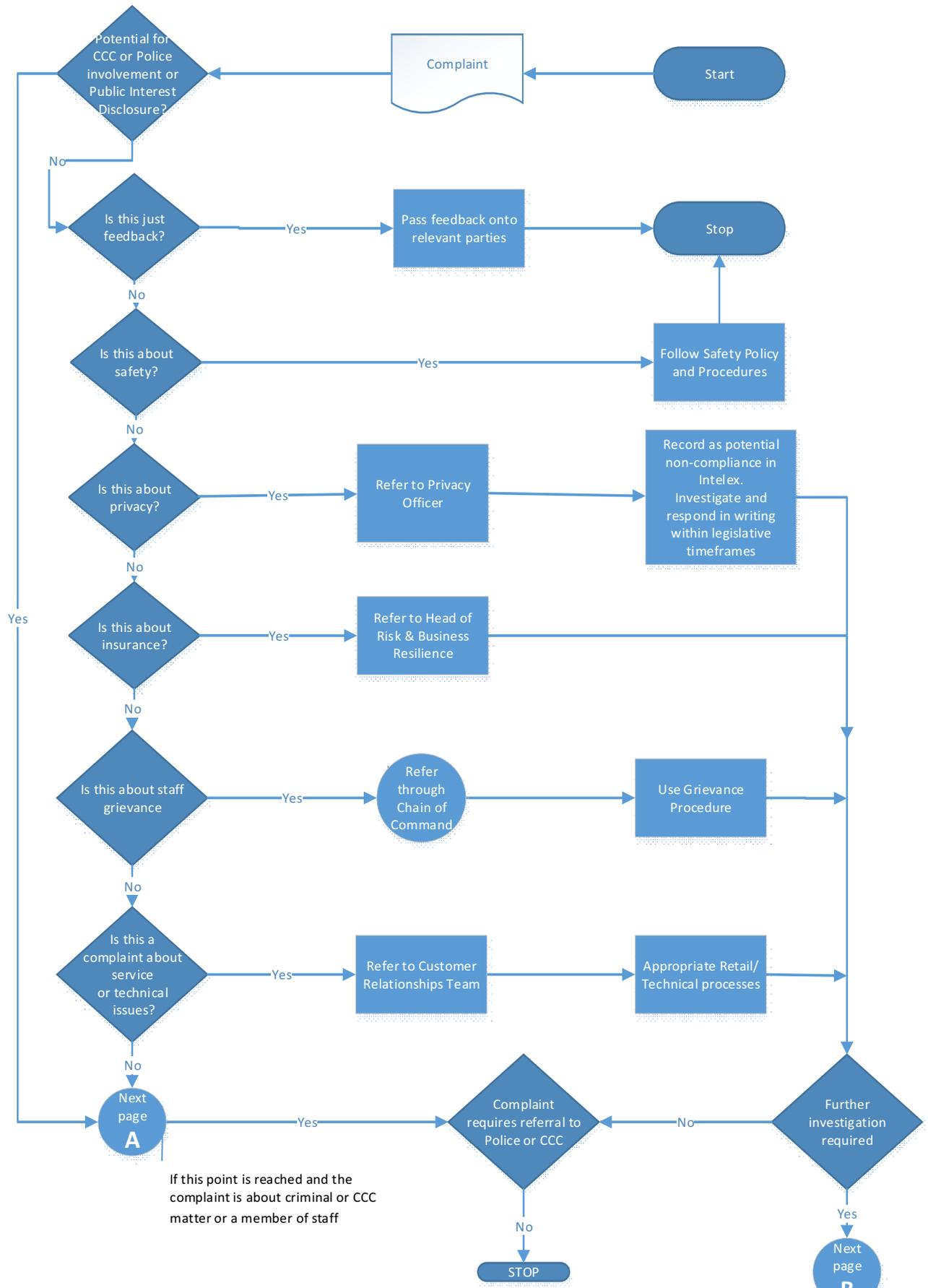
- a) Compliance with this Policy.
- b) Acting in a professional and unbiased manner when managing complaints.
- c) Advising the Document Owner if this policy is not consistent with current practices.
- d) Where possible, minimise printing and/or avoid creating duplicate copies of this policy. Ensuring current versions are sourced from the [Document Centre](#).

## 5. Definitions

Term	Meaning
Complaint	Expression of dissatisfaction made to an organisation where a response or resolution is explicitly or implicitly expected.
Complainant	A person aggrieved by a situation who then lodges a complaint.
Disclosure	A specific type of complaint – inferring unethical, unlawful or undesirable conduct, which may be classified as misconduct or corrupt conduct (refer to Public Interest Disclosure Policy).
Feedback	Opinions, comments and expressions of interest in the Unitywater’s services, products and processes.
Team member	Means a team member of Unitywater, whether employed on a permanent, temporary or casual basis and includes all Board Members, Executive Employees, Employees and Contractors.

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## Attachment 1 – Where to direct a complaint – Part1



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