

MOORABOOL Wind Farm



Moorabool Wind Farm Enquiries and Complaints Handling Plan

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Terms and Definitions

Term	Definition
Community	Interested members of the general public, community members, community groups, near neighbours and host landowners. Excludes staff members of MWF or Goldwind Australia.
Complainant	Person, organisation or their representative (including clients, consumers, service users, customers etc.) making a complaint.
Complaint	Expression of dissatisfaction made to or about GWA and / or MWF, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
Complaint and Enquiry Management System	Encompasses all aspects of the policies, procedures, practices, staff, hardware and software used by an organisation for the management of complaints.
Disputes	Unresolved complaints escalated internally or externally, or both.
Enquiry or Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly to or about GWA, its projects, the MWF Project, its products, services, staff, contractors and or their handling of complaints. NOTE: Where appropriate, clarification can be sought from the representative on whether feedback is intended to be handled as a complaint.
Unreasonable behaviour	Unreasonable behaviour by a complainant may be behaviour, which by its nature or frequency, raises substantial health, safety, resource or equity issues for GWA, its staff, other service users and complainants, or the complainants themselves. Examples include unreasonable persistence, demands, lack of cooperation, arguments or behaviour.
MWF	Moorabool Wind Farm Pty Ltd and associated wind farm project.

1 Introduction

This document describes Goldwind Australia's (GWA) process for effective management of enquiries and complaints lodged by interested parties in relation to Moorabool Wind Farm (MWF) and in accordance with the GWA Handling Enquiries and Complaints Policy.

Condition J of the Planning Permit for MWF requires a Complaints Management System. The Policy and this Procedure fully meet the intent and expectations of the Planning Permit condition and together form the Complaints Management System.

The Enquiries and Complaints Management System has been designed and established in accordance with the Australian Standard AS 4269:1995 Complaints Handling, superseded and updated by AS/NZS 10002:2014 – Guidelines for Complaint Management in Organisations.

Consistent with the GWA Handling Enquiries and Complaints Policy all staff and contractors involved with the Project are obligated to properly handle enquiries and complaints to enhance GWA reputation, professionalism and citizenship.

This document will be made publicly available on the MWF Project website and at the site office.

2 Scope and Coverage

This Plan is applicable to all persons and interested parties associated with the MWF while GWA is engaged on the project as Construction Manager, Asset Manager or other relevant role.

The Plan covers processes for dealing with all enquiries and complaints from stakeholders in relation to the project.

It is the intent that the systems outlined in this Plan will be maintained for the life of the project, to the degree deemed necessary and in accordance with expectations and needs of all interested parties.

3 Purpose and Intended Outcomes

The purpose of the Plan is to provide a system and process for the management of all enquiries and complaints in relation to the project. All complaints will be addressed in accordance with the Enquiries and Complaints Management System.

This Plan supports the GWA Handling Enquiries and Complaints Policy and is based on guiding principles set out in AS/NZ 10002:2014 Standard and summarised by:

- Enabling lodgement of enquiries and complaints (section 5);
- Managing enquiries and complaints (section 6);
- Coordinating and managing the parties (section 7); and
- Accountability, prevention of ongoing disputes and continuous improvement (section 8).

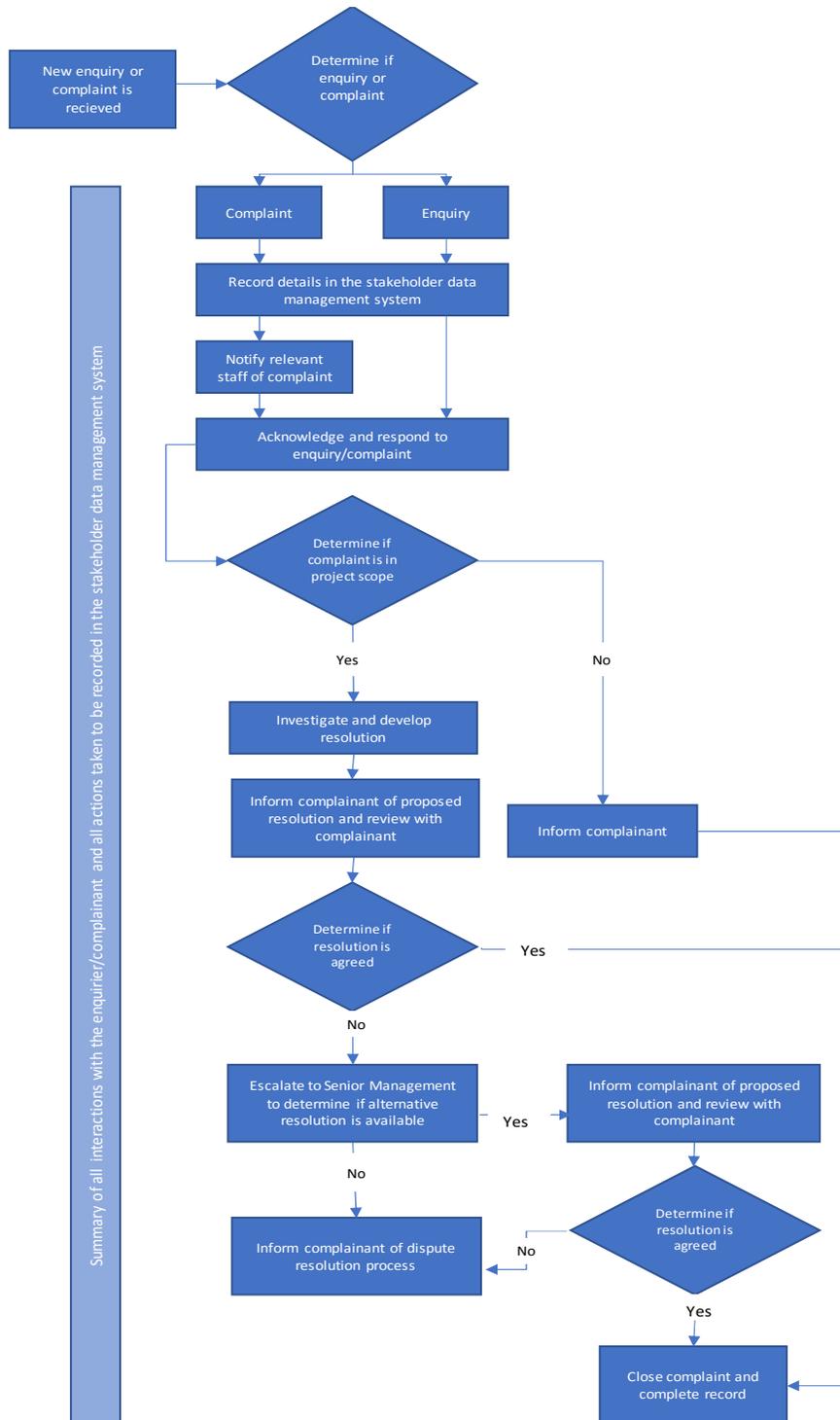
In accordance with the Project Approval, the Enquiries and Complaints Management System outlines processes for:

- Registration of information on all enquiries and complaints received;
- Addressing complaints and reaching resolution; and
- Mediation steps where required.

Information on the above shall be retained in an Enquiries and Complaints Register, included in compliance reports and made available to the Regulator and other interested parties on request.

4 Process Flow Diagram

A diagram outlining the process for handling enquiries and complaints is provided below, including GWA internal allocation of responsibilities.



5 Enabling Lodgement of Enquiries and Complaints

5.1 Principles

In supporting the lodgment of enquiries and complaints, this Plan will be based on the following principles:

- People focused – GWA recognises everyone has a right to complain and complainants should be treated with respect;
- GWA will aim to ensure no detriment to complainant occurs because of a complaint made;
- GWA will aim for visibility and transparency of how and where a complaint can be made; and
- GWA will aim to ensure accessibility of the Enquiries and Complaint Management System.

5.2 Avenues for Public Contact

GWA will aim to ensure visibility and transparency of the Complaints and Enquiries Management System including information about how and where a complaint may be made.

The following avenues are provided for community enquiries and complaints during entire life of the MWF project:

Method	Process
In person	By arrangement at the Site Office, Operations & Maintenance Facility, head office or other appropriate location.
Telephone	1800 019 660 (24 hours)
Email	info@mooraboolwindfarm.com
Post	Moorabool Wind Farm Level 7, 31 Queen Street, Melbourne, VIC 3000
Website	www.mooraboolwindfarm.com The website provides: <ul style="list-style-type: none"> • Details of other forms of contact (email, post and phone).

5.3 Advertising of contact details

The telephone number, website, postal and email addresses will be published prior to the commencement of construction and prior to the commencement of operations. Advertisements/contact details will be placed as follows:

- Local newspapers (Moorabool News);
- Moorabool Shire Council offices;
- Visible signage at the main entrance to the project from the public road;
- Project website.

The timing of newspaper advertisements will be as follows:

- At least one month prior to the start of construction, for a one-week period;
- At a minimum, every six months during construction, for a one-week period;
- Annually during operations, for a one-week period.

5.4 Accessibility

GWA will aim to ensure the System is accessible to everyone and will provide support to people to make an enquiry or complaint as required. Under no circumstances will GWA charge a fee or levy for receiving and processing enquiries and complaints.

Refer to section 5.2 for methods of making a complaint.

5.5 Training

All persons likely to receive a complaint shall receive training in:

- Identifying if extra assistance is required to accurately convey the complaint;
- How to provide acknowledgment of a complaint;
- The complaint management process;
- Communicating resolutions and/or mitigation;
- Escalation paths; and
- Reporting requirements.

6 Managing Enquiries and Complaints

6.1 General Principles

GWA will aim to manage enquiries and complaints in line with the following general principles:

- to acknowledge each complaint and enquiry promptly and as soon as is reasonably practical;
- to manage each complaint or enquiry in an objective, unbiased and equitable manner;
- To treat any personally identifiable information in line with relevant privacy laws and ethical obligations; and
- To ensure communication of policies, procedures and decisions with relevant complainants and staff.

It is important to distinguish at the outset between an **enquiry** and **complaint** as there are different paths to resolution and closure. It may be necessary for Project staff to seek clarification from the complainant / enquirer in order to determine the correct path to follow.

Consistent with GWA Handling Enquiries and Complaints Policy, senior management shall expeditiously address and seek timely resolution of all complaints and claims, directed against the Project or any other related matters.

Where there are mitigation circumstances and the timescales set out below are not met, such cases shall be analysed in depth and reported to the GWA senior management.

6.2 Enquiries and Complaints Register

In accordance with the Planning Permit it is a requirement to establish and maintain a Complaints Register (Condition 15. J)). Prior to commencement of construction, the Enquiries and Complaints Register will be established and managed by the Community Engagement Officer.

The Enquiries and Complaints Register will provide a structure for the lodgement of all information in relation to enquiries and complaints. It will assist in the management of all enquiries and complaints.

The Enquiries and Complaints Register will be set up and maintained using a secure stakeholder management system.

6.3 Process for Receiving and Resolving Enquiries

The following process for receiving **enquiries** would be carried out on receipt of an enquiry:

1. The person receiving the enquiry provides details of the enquiry to the Community Engagement Officer.
2. Enquiry is received and all details logged in Stakeholder Management Database by the Community Engagement Officer or directly by the staff member who has received the enquiry.
3. The Community Engagement Officer shall aim to acknowledge receipt of the enquiry within **three working days**, or as soon as reasonably practical.
4. The enquiry will be resolved at first point of contact wherever possible.
5. Depending on the nature of the enquiry, in some cases it may not be possible to respond within this timeframe. In such cases shall be analysed in depth and reported to the GWA senior management in order to minimise the impact on affected parties.
6. In all instances, enquiries should be responded to, and successfully resolved where possible, within **five working days**.
7. All correspondence will be documented in the Stakeholder Management Database.

Resolution of enquiries should aim to provide as much information as possible to the satisfaction of the enquirer.

6.4 Process for Receiving Complaints

The following process would be carried out on receipt of a complaint:

1. Complaint is received and all details logged in the Stakeholder Management Database.
2. Relevant team members shall be notified of the complaint, including but not limited to:
 - a. Community Engagement Officer
 - b. Owners Project Manager
 - c. EPC Project Manager
 - d. Construction Site Manager
 - e. HSE Manager (as required)
3. The Community Engagement Officer (or other nominated person relevant to the complaint) shall acknowledge and provide an initial response to the complaint.
4. Initial response timescales for complaints shall be:
 - a. Where complaints are received in person, an acknowledgement and initial response will be provided **immediately** if possible, or if circumstances do not allow, within **24 hours** (or next working day).
 - b. Where complaints are received by telephone or email an acknowledgement and initial response will be provided within **24 hours** (or next working day) of the complaint being received.
 - c. Where complaints are received by post, and no email or phone contact is provided, a written response will be made within **two working days**.

The initial response to an enquirer / complainant should:

- acknowledge the enquiry / complaint has been received;
- ask for further information, if thought necessary to help resolve it; and
- explain the process and commit to provide a proposed resolution or an update within **five working days**.

The initial response does not necessarily need to include a resolution to the complaint if it is not available at the time.

Complaints should be handled in a manner intended to lead to an effective resolution as quickly as possible.

6.5 Assessment and Investigation of Complaints

The Community Engagement Manager and Project Manager (or other nominated person) shall assess whether the complaint is within the Project's scope. They will also assess if more than one issue is raised and if so, whether each issue needs to be separately addressed. Should any issue be deemed outside of the Project's scope, the complainant will be informed as soon as practicable, provided with an explanation as to why it is considered out with the Project's scope and the complaint closed.

The Community Engagement Manager may request the Project Manager or delegate to collect further information from the complainant if required. Relevant members of the Project Team may be asked to further investigate the complaint and seek mitigation or resolution measures.

If deemed necessary by the Project Team, the complaint will be escalated internally to Senior Management for review and resolution.

An update on investigations and proposed resolution (if available) will be provided within **five working days** of receipt to the complainant by the Community Engagement Officer or delegate, or sooner if possible.

Further updates will be provided to the complainant as required until the complaint is closed.

6.6 Resolution of Complaint, Follow Up and Closing Complaints

Results of investigations and proposed resolution measures will be communicated to the complainant. GWA will work with the complainant to develop a solution to the issue. This may be by telephone or email.

The Community Engagement Officer or delegate will prepare a written statement of the complaint resolution and provide it to the complainant.

Communication of the resolution should include:

- What actions were taken in response to the complaint;
- The outcome(s) of the complaint;
- The reasons for any decisions made;
- Any remedy or resolution offered; and
- Request for feedback from the complainant as whether the information provided has resolved their complaint
- Information on other reviews, appeals or avenues available to the complainant.

A Complaint will be considered closed when a complainant advises that they consider the complaint resolved. Alternatively, if no response is received from the complainant within **ten working days**, the complaint will be considered closed.

The outcome of a complaint, any rectification measures or undertakings and relevant conversations are to be recorded in the Stakeholder Management Database.

If a complaint is not resolved with **30 working days** of receipt, the dispute resolution process defined below shall be used.

6.7 Management of unreasonable situations

At times, project staff may receive unreasonable complaints or the behaviour of the complainant may be deemed unreasonable. At all times project staff will deal with each complaint or enquiry in an objective, unbiased and equitable manner. The AS/NZ 10002:2014 Standard provides further guidelines.

GWA places priority on Health and Safety and aims to ensure all community, staff, contractors and complainants are protected from harm during the handling of enquiries and complaints.

7 Coordinating and Managing the Parties

7.1 General protocols

- Enquiry and complaint information must be kept confidential and not released to third parties without GWA Department Manager authorisation.
- The identity of persons dealing with enquiries should be protected, with regard to releasing minimal information (such as first name) to the complainant.
- Personal information relating to complaints must be protected and not shared publicly including but not limited to:
 - Dates of birth;
 - Physical or mental health or disability;
 - Financials;
 - Phone numbers; or
 - Addresses (email and physical).
- In the event of multiple parties being involved then representatives from each are to be identified and a suitable communication and consolation mechanism implemented.
- Project staff will follow a code of conduct:
 - Be polite and courteous at all times.
 - Maintain discretion and confidentiality where required.
 - Inform the complainant if their behaviour borders on unacceptable behaviour and of the consequences of a breach by the complainant (such as alternative arrangements to handle the complaint, restricting service or terminating service altogether).

8 Accountability, Prevention of Ongoing Disputes and Continual Improvement

8.1 General Principles

GWA will aim to manage enquiries and complaints in line with the following general principles:

- to ensure that accountability for the operation of its complaint management system is clear; and
- to seek to minimise the possibility of complaints escalating into ongoing disputes.

8.2 Internal Escalation Options

Should a satisfactory resolution or mitigation not be agreed with the complainant GWA internal escalation options should be considered. These include:

- Raise unresolved resolutions / mitigations with the Department Manager.

- Determine if a reasonably practical alternative resolution or mitigation can be offered.
- Discuss alternative resolution or mitigation with complainant.
- If no satisfactory resolution can be reached, the complainant should be advised of the Dispute Resolution process.

8.3 Dispute Resolution

The MWF Project Team has **30 working days** to attain satisfactory resolution of a complaint or dispute. If the dispute is not resolved within the time allowed for internal dispute resolution, the following mediation system shall be triggered:

- The Community Engagement Manager shall contact the Environmental Advisor (EA). Full details of the complaint, investigations and correspondence with the complainant will be provided to the EA.
- EA shall contact the complainant and instigate the appropriate mediation process.
- Mediation will normally occur within **10 working days** of both parties agreeing to the appointed mediator (EA or other).
- The EA or mutually agreed and appointed mediator shall organise the time and place for mediation to occur.
- The applicant and respondent may be required to provide the EA or mediator with a brief statement setting out their position with regard to the issues that need to be resolved in addition to other information requirements.
- At the conclusion of the mediation session the complainant and respondent, with the EA or mediator, will prepare a written statement of any resolution for agreement and signature by the affected parties.
- If mediation is not successful the EA or mediator will report this to the Community Engagement Officer and the complainant will be advised of their rights to pursue the matter further.

8.4 Approach to mediation, if required

In the event that agreement cannot be reached between the project team and complainant, as to resolution of a specific complaint, then it may be necessary to seek involvement of an independent impartial third party to facilitate mediation of the matter. The details of the process and facilitator will depend on the scope of the complaint, issues involved and appropriateness of the facilitator for the matter to be resolved. MWF will aim to constructively participate in any required mediation process.

8.5 Continual Improvement

The Enquiries and Complaints Management System shall subject to regular audits to ensure conformity to this plan and to continually improve effectiveness and efficiency.

The results from audits shall be reported to the GWA SMT and relevant stakeholders quarterly in the GWA HSEQ Quarterly Report.

Separate internal and external independent audits shall be conducted annually, commencing from the date of approval and in accordance with the [CO-PRC-0004 Audit and Inspection Procedure](#).