



# Public Complaints Handling

## Procedure

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# Definitions

Term/Abbreviation	Definition
<b>HSEQ</b>	Health, Safety, Environment and Quality
<b>Manager</b>	The Manager is the employee in charge, be it the Project Manager, Site Manager, Wind Farm Supervisor, General Manager etc.
<b>Complaint</b>	Any expression of dissatisfaction made to or about Pacific Blue, any Pacific Blue site, Pacific Blue staff or the complaints handling process itself where a response or resolution is explicitly or implicitly expected or legally required.
<b>Complainant</b>	Person, organisation or their representative making a complaint.
<b>Respondent</b>	The person responsible for responding.
<b>Dispute</b>	An unresolved complaint escalated internally/externally/both.
<b>Incident</b>	Any unplanned event that caused or had the potential to cause personal injury, illness, damage to property, environmental harm, a non-conformance or other loss.
<b>Unreasonable Behaviour</b>	Conduct that involves behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for Pacific Blue, its staff, other members of the public or complainants.



## 1. Purpose

The purpose of this procedure is to ensure that Pacific Hydro Australia, trading as Pacific Blue Australia:

- Promptly acknowledges public complaints and keeps the complainant informed of any progress, findings and outcomes
- Deals with the complaints respectfully and in a co-operative manner
- Keeps accurate records of the complaint and subsequent investigation process in order to respond to regulatory requirements
- Maintains positive relationships and encourages constructive, two-way communication with the community and external parties
- Learns from complaints in order to deliver quality improvements

To ensure that Pacific Blue achieves this purpose, we follow the guiding principles outlined in **Table 1**.

**Table 1 Guiding principles to complaint management**

Guiding Principles	Details
<b>Commitment</b>	We are committed to resolving complaints and have a culture that recognises an individual's right to complain. We value complaints and recognise them as being part of improving our business and serving our communities.
<b>Accessibility</b>	People with a range of needs can easily make a complaint and staff actively assist them to navigate the complaints process.
<b>Transparency</b>	We make it clear how to complain, where to complain and how the complaint will be handled. The steps taken to respond to a complaint are recorded and will stand up to scrutiny.
<b>Objectivity and fairness</b>	Complaints are dealt with courteously, impartially, within established timeframes and are assessed on merit.
<b>Privacy</b>	Complaint information is handled according to privacy laws and other relevant legislation. We provide clear information about how we handle personal information. Complaint data is de-identified if reported on more widely.
<b>Accountability</b>	We are accountable internally and externally for our decision making and complaint handling performance. We provide explanations and reasons for decisions and ensure that our decisions are subject to appropriate review processes.
<b>Continuous improvement</b>	Acting on, learning from and using complaint data helps us identify problems and improve.

## 2. Scope

This procedure applies to all Pacific Blue development, construction and operating sites. All Pacific Blue employees communicating with members of the public and conducting business on behalf of Pacific Blue are bound by the company policies and procedures. Employee complaints will be managed in accordance with the Pacific Blue Grievance and Complaints policy.

Pacific Blue's retail business has separate procedures and processes relating to complaints management that are not captured within the scope of this document.



### 3. References

References throughout the procedure to other Pacific Blue documents are detailed below:

[Redacted references]

### 4. Responsibilities

**Table 2** below outlines roles within the company and their duties in relation to complaint handling.

**Table 2 Roles and responsibilities in relation to complaint handling**

Role	Responsibilities
Chief Executive Officer	<ul style="list-style-type: none"> <li>Ensuring that complaints are managed effectively, including allocating the resources needed for an effective and efficient complaint management system.</li> <li>Ensuring the appropriate policies and procedures are in place to effectively manage complaints and updated in.</li> <li>Ensuring that information about this procedure is easily accessible to stakeholders and the community.</li> <li>Monitoring complaints management performance and driving continuous improvement.</li> </ul>
Engagement and External Affairs Manager	<ul style="list-style-type: none"> <li>Ensuring all staff and contractors are aware of this procedure.</li> <li>Implementing and maintaining the complaint management system, including the complaints register.</li> <li>Establishing a process of performance monitoring, evaluation and reporting.</li> <li>Reporting to senior management on the operation of the complaint management system and systemic issues or trends identified through the receipt of complaints, with recommendations for improvement where appropriate.</li> <li>Implementing internal and external escalation procedures for unresolved complaints/disputes.</li> <li>Arranging appropriate training for staff responsible for managing complaints.</li> </ul>
Engagement and External Affairs Team	<ul style="list-style-type: none"> <li>Providing first point of contact for complainants.</li> <li>Accurately recording the complaint and maintaining records of the investigation process in the complaints register.</li> <li>Managing the investigation process.</li> <li>Meeting with complainants together with other relevant Managers.</li> <li>Liaising with any relevant government bodies (i.e. Government departments, EPA, councils).</li> </ul>



Senior Environment and Development Planner	<ul style="list-style-type: none"> <li>Assess environmental complaints when engaged by the Engagement and External Affairs team – noise or vibration, flora or fauna, birds and bats etc.</li> </ul>
Health, Safety and Wellness Team	<ul style="list-style-type: none"> <li>Facilitating and coordinating the reporting, recording and investigation of HSEQ incidents.</li> </ul>
Managers	<ul style="list-style-type: none"> <li>Liaising with the Engagement and External Affairs team and following up any required actions or controls that may result following the complaint investigation.</li> <li>Meeting with complainants together with members of the Engagement and External Affairs team.</li> <li>Ensuring that corrective action is taken to prevent a problem from reoccurring.</li> <li>Communicating with and managing Suppliers or Contractors as required.</li> </ul>
Legal Team	<ul style="list-style-type: none"> <li>Providing legal advice where required to Pacific Blue's response to a complaint or issue</li> </ul>
Employees/Contractors	<ul style="list-style-type: none"> <li>Notifying the Engagement and External Affairs Team or senior Pacific Blue manager on site of any complaints received.</li> <li>Adhering to any controls or actions put in place by Pacific Blue to manage or mitigate the complaint.</li> </ul>

## 5. Accessibility

A person can make a complaint via:

1. Mail
  - Pacific Blue Melbourne Office  
Level 13, 700 Collins Street  
Docklands, 3008, Vic
2. Telephone
  - 1800 731 734  
9:00 am – 5:00 pm (AET) Monday to Friday, excluding national public holidays
3. Email
  - [enquiries@pacificblue.com.au](mailto:enquiries@pacificblue.com.au)
4. In person

### 5.1 Information about complaints management

Pacific Blue will ensure that information about this complaints management process is readily available and proactively communicated to stakeholders and community members of its project sites. In accordance with AS/NZS 10002:2014, information about this procedure will, at a minimum, be accessible at our operational sites, on the Pacific Blue website and in leaflets, newsletters or other relevant publications related to Projects in development or operation.

Information through the above means will include information about:

- Where complaints can be made
- How complaints can be made
- When complaints can be made
- When acknowledgement of complaints can be expected



- What information should be provided by the complainant
- The process for handling complaints
- Time periods associated with various stages in the process
- The complainant's options for review
- How the complainant can obtain feedback on the status of their complaint

## 6. Managing complaints

Pacific Blue manages complaints following the process outlined in Figure X and in detail below.



**Figure 1 Pacific Blue complaint handling process**

### 6.1 Recording a complaint

Any Pacific Blue employee or contractor who receives a complaint should refer it immediately to the engagement and external affairs team. A complaint should be acknowledged as soon as reasonably practicable (usually within 24 hours), and the complainant should be provided with the information set out in **Section 5.1**.

The following information must be recorded within Pacific Blue's complaints register:

1. A unique identifier for the complaint
2. Name and address of the complainant and, where possible, any applicable property reference number
3. Means by which the complaint was made
4. Person who recorded the complaint
5. Location, time and date of the incident
6. A description of the complainant's concerns (including selecting the categories of complaint this relates to within the relevant database)
7. What outcome the complainant is seeking

### 6.2 Notification

The following persons should be notified of complaints ranked serious or complex:

- Relevant Regional Services Manager, Site Manager or Construction Site Manager
- Production Manager/Project Manager
- General Manager Operations/General Manager Development and Delivery
- CEO
- Legal team
- Site Operator or construction contractor (**external**)

If the complaint involves an incident (defined as causing or having the potential to cause personal injury, illness, damage to property, environmental harm, a non-conformance or other loss) it should be reported to the Health, Safety and Wellness Manager (or their delegated team member) who will register the complaint within the appropriate Incident Register.



Any complaints related to noise or vibration & flora or fauna will be referred to the environment team.

The relevant planning conditions and site-specific planning management plans should be referred to in order to determine whether a government department or authority should be notified.

### 6.3 Assessment

If the complaint cannot be resolved immediately, the respondent should assess whether there is more than one issue raised in the complaint and, if so, whether each issue needs to be separately addressed. Issues should be assessed and ranked according to **Table 3** below.

The ranking should be recorded in the complaints register.

**Table 3 Complaint assessment matrix**

Level	Colour	Timeframe for response
<b>Serious</b> (likely to cause or threaten harm to life or property)	Red	Within 24 hours
<b>Complex</b> (potential to develop into negative media issue)	Orange	Within 3 business days
<b>Easily resolved</b> (not likely to escalate or involve external parties)	Yellow	Within 10 business days

### 6.4 Investigation

The respondent should work with the relevant Manager and the complainant to resolve the complaint. For more complex complaints (including complaints related to noise and TV reception), a short, written plan should be prepared and noted in the complaints register. The plan should:

- Define what is to be investigated
- List the steps involved and whether any additional information is required
- Provide an estimate of time it will take to resolve the complaint
- Identify the remedy the complainant is seeking, whether the complainant's expectations are realistic or need to be managed, and other possible remedies;
- Note any special considerations that apply to the complaint – for example, if the complainant has asked for their identity to be withheld from others or if there is sensitive or confidential information that needs to be safeguarded

Any identified actions or controls will be recorded in the complaints register until closure. Monthly complaint reports will be published to track ongoing complaints.

### 6.5 Communicate

The investigation approach and timeframe for resolution should be communicated to the complainant as soon as reasonably practicable. The complainant should be updated regularly as to the progress of the investigation. If the complaint cannot be resolved in the communicated timeframe, the complainant should be advised of the reason why and provided with an updated timeframe for resolution.

To accord natural justice, a complainant should be given an opportunity to comment on contrary information or claims from another source before a decision is made to dismiss the complaint.





## 7. Outcome

When the investigation is complete the complainant should be advised of the outcome. This should be communicated verbally in the first instance (where possible) and followed up in writing. The outcome letter should include:

- The steps taken to investigate or resolve the complaint
- The outcome and reasons for the decision
- Remedies being offered (if applicable)
- The name and telephone number of the person the complainant can contact to discuss the outcome
- Options for review

Records of telephone conversations, meetings and correspondence with the complainant should be recorded in the complaints register. If the complainant has not escalated their complaint within three months, the complaint should be considered closed.

### 7.1 Internal Review

If the complainant is unhappy with the outcome of the investigation the complaint should remain open.

Advice should be sought from the complainant about why they disagree with the findings and what they would like reviewed.

The CEO will appoint an internal reviewer who was not involved in managing the original complaint to review the investigation process and findings. The procedure set out at **Section 6.5** should be followed for internal reviews. In the case of a dispute Pacific Blue may consider appointing an independent mediator to assist in achieving a resolution.

### 7.2 External Review

In situations where the complainant is not satisfied with Pacific Blue's investigation findings, they should be directed to either the relevant states Environmental Protection Authority (EPA), the relevant council, relevant government departments, the Wind Farm Commissioner and/or their solicitor.

## 8. Noise complaints

All noise complaints will be handled in the manner outlined above, however the following additional procedures will apply.

### 8.1 Register and recording requirements

If the complaint is related to noise, the date, time, noise description and weather conditions at the receptor will be recorded and included in the complaints register. All complaints relating to operational noise will be referred to the Regional Services Manager no later than the next business day after receipt of the complaint.

### 8.2 Noise complaint investigations

Noise is a technically complex issue with different people responding differently to sound exposure of different frequencies and levels. When evaluating the complaint, both legal and planning compliance assessments may need to be undertaken in conjunction with the assessment of the



complainant's perception of the noise issue (i.e., what levels are personally acceptable and the complainant's understanding of compliance requirements).

The investigation plan will be completed in conjunction with the internal Environment team.

The following will be considered on a case by case as appropriate:

- Meteorological circumstances and the operational status of the turbine(s) at the time of the breach
- Did the house exist or was it approved before the wind farm was granted planning approval?
- Is there a pre-existing agreement between Pacific Hydro and the complainant?
- Preconstruction noise level predictions
- Post construction noise compliance data and reporting

If appropriate, the complainant should be asked to keep a diary, noting where and when the noise was observed, its frequency, weather conditions and wind speed and direction. The diary should preferably be kept for a minimum of two weeks. If permitted by the complainant, an acoustic expert may be engaged to conduct noise logging at the residence and review data.

### **8.2.1 Response protocol**

In the unlikely event that Pacific Hydro is made aware of a compliance breach the following protocol will apply:

- Pacific Blue will actively seek to mitigate noise levels at the source and at the complainant's location (being any non-host dwelling existing on land in the vicinity of the wind energy facility as at the date of issue of the planning permit) as an agreed outcome between the complainant and Pacific Blue
- Noise optimisation of the relevant wind turbine(s) under the same meteorological circumstances as occurred at the time of the breach will be implemented
- In the event of a further breach the selective shut down of the relevant wind turbine(s) or turbines in the same meteorological circumstances will be investigated. Where under the same meteorological conditions subsequent confirmed noise breaches occur, the decommissioning of the relevant turbine(s) will be investigated

### **8.3 Television & mobile reception complaints**

Complaints related to television or mobile reception may require a survey to be carried out at the location. The respondent should refer to the planning approval for the project to determine if this is relevant.

## **9. Accountability and improvement**

### **9.1 Reporting and auditing**

Complaints will be recorded in a systematic way so that information can be easily retrieved for reporting and analysis. Internal monthly reporting processes will be used to monitor trends, measure the quality of our process and make improvements. An audit of complaints will be undertaken at least annually, with audit results reported to relevant government bodies in accordance with permit requirements.

### **9.2 Continuous improvement**

Pacific Blue is committed to continuous improvement. We will:



- Monitor industry trends in order to implement best practices in complaint handling
- Regularly review the complaints management system and complaints data
- Implement appropriate system changes arising out of our analysis and complaints data and continual monitoring of the system



## 10. Document Control

The following table lists personnel who are responsible for authorising the document:

Title	Name	Signature	Date
[Redacted]			

## 11. Document History

The following table lists the changes made to this document:

Version	Date	Amended by	Comments
[Redacted]			

