

Aquacell Pty Ltd

Complaints Handling and Dispute Resolution Policy

Aquacell Pty Ltd

Head office: Suite 602/6A Milsons Point NSW 2061, Australia

P: +61 2 4721 0545

www.aquacell.com.au

ABN 79 072 487 015



Contents

Document Creation and Review	3
Document Control.....	3
Complaints Handling and Dispute Resolution Policy	4
1. Background.....	4
2. Purpose.....	4
3. Introduction.....	4
4. Definitions.....	4
5. Guiding Principles	5
6. Responsibilities	5
7. Procedure	6
8. Training.....	8
Attachment A – Complaint Report.....	9
Attachment B – Documented Performance Standards	10



Document Creation and Review

Revision No	Author	Reviewed By	Approved By	Date
1	Colin Fisher			20 August 2009
2	Colin Fisher		Colin Fisher	20 March 2011
CS030-3	Annabelle Caspersz			5 December 2011
CS030-4	Justin Taylor		Colin Fisher	6 th March 2017
CS030-5	Hugh Fisher		Hugh Fisher	3 rd August, 2018
CS030-6	Hugh Fisher		Hugh Fisher	15 th August, 2018

Document Control

Revision No	Status	Issued To		Date
		Name	Organisation	



Complaints Handling and Dispute Resolution Policy

1. BACKGROUND

Aquacell designs, builds and operates recycled water schemes. It currently holds Network Operator Licenses and Retailer Licence under the Water Industry Competition Act (2006) (“**WICA Licence**”).

2. PURPOSE

The purpose of this Policy is to set out how Aquacell deals with complaints from customers and resolves disputes. While it is hoped that there will be few complaints received from customers, it is recognised that complaints may arise and this Policy assists staff with the process involved for handling complaints and resolving disputes.

This policy and the principles it embodies, applies to all Aquacell customers, not just the customers who fall under the Retail Operator’s License.

When necessary or appropriate, Aquacell may make use of an approved ombudsman scheme such as EWON (Electricity and Water Ombudsman NSW).

3. INTRODUCTION

Aquacell is committed to dealing with complaints and resolving disputes efficiently and fairly. Handling complaints well gives Aquacell an opportunity to better understand its customers, improve service and minimise disputes.

This policy has been written based on the guidelines outlines in AS10002:2014 Guidelines for Complaint Management in Organisations. Staff are required to follow this policy.

If you have any queries about this Policy, you should contact Aquacell’s Complaints Handling Officer by phone on (02) 4721 0545

4. DEFINITIONS

For the purpose of this procedure, the following definitions apply:

- Complainant – person, organisation or their representative (including clients, consumers, service users, customers, etc.) making a complaint.
- Complaint – Expression of dissatisfaction made to or about an organisation, 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 Management System – encompasses all aspects of the policies, procedures and practices, staff, hardware and software used by an organisation for the management of complaints.
- Disputes – unresolved complaints escalated, internally or externally, or both.
- Feedback – Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly to or about the organisation, its products, services staff or its handling of a complaint



5. GUIDING PRINCIPLES

Aquacell are committed to the guiding principles outlined in AS1002:2014 Guidelines for Complaint Management in Organisations, namely:

- People focus – Aquacell acknowledges that everybody has the right to complain and that complaint resolution will have a proactive, people focussed approach;
- Ensuring no detriment to complainant – complainants will not be disadvantaged or adversely affected because they have made a complaint;
- Visibility and transparency – Aquacell will ensure that all complaints handling activities are transparent and activities communicated to all relevant parties, including, where appropriate, the public. Complaints Handling Code of Practice will be made available publically;
- Accessibility – all customers or parties affected by Aquacell’s activities will have access to the complaint handling mechanism outlined in this document;
- No charges – Aquacell does not charge a fee to complain.

In addition to the guiding principles outlines in the standard, Aquacell also commit to:

- Investigate all complaints in a timely and objective manner;
- The efficient and fair resolution of complaints;
- Allocating adequate resources to handle and resolve complaints;
- Where appropriate and a complainant requests, provide assistance to the complainant in the formulation and lodgement of complaints;
- Dealing with complaints quickly and courteously;
- Documenting all complaints;
- Reviewing and analysing complaints data;
- Identifying and taking actions to correct systemic complaints;
- Statutory reporting of complaint data where required;
- Reviewing complaint handling procedures and related documentation periodically;

6. RESPONSIBILITIES

Aquacell CEO:

- Ensuring that a Complaint Handling and Dispute Resolution Procedure is maintained;
- Ensuring that a concise Complaint Handling Code of Practice is established, documented and made available to customers;
- Ensure all documentation is reviewed periodically;
- Appoint a Complaints Handling Officer.

Complaints Handling Officer:

- Facilitate the handling of customer complaint in line with this procedure
- Maintain customer complaint data for future reference and analysis

All Other Staff



- Listen courteously and speak politely to a person who is making a complaint;
- Where practical, and authorised to do so, resolve the complaints on the spot;
- Ensure complaints that cannot be resolved on the spot are passed onto the Customer Complaint Officer ;
- Respond in a timely manner to customers who have complained;

7. PROCEDURE

Complaint Procedure

If a customer submits a complaint to Aquacell, Aquacell:

- a) must, if the complaint is oral, either resolve it “on the spot” to the customer’s satisfaction, or if that is not done, request the customer to submit a written complaint (however, there is no requirement that the complaint be in writing before it can be dealt with according to these procedures) and refer the complaint to the Complaints Handling Officer;
- b) must, if the complaint is in writing, acknowledge in writing receipt of the complaint as soon as practicable and in any event within 14 days from receipt, and enclose a copy of this Policy for the customer’s information;
- c) must ensure that the complaint receives proper consideration resulting in a determination by the Complaints Handling Officer as the person designated by Aquacell as appropriate to handle complaints;
- d) must act in good faith in dealing with and resolving the complaint;
- e) must investigate the complaint including by:
 - a. seeking all relevant information from the complainant;
 - b. obtaining all relevant information from Aquacell staff,
- f) may in its discretion give any appropriate remedy to the complainant, including any of the following:
 - a. information and explanation regarding the circumstances giving rise to the complaint;
 - b. an apology; or
 - c. compensation for loss incurred by the complainant,
- g) must communicate to the complainant in relation to the complaint as soon as practicable and in any event not more than 45 days after receipt by Aquacell of the complaint:
 - a. the determination in relation to the complaint;
 - b. the remedies (if any) available to the member; and
 - c. information regarding any further avenue for complaint.

All oral complaints not resolved “on the spot” and all written complaints must be referred to the Complaints Handling Officer on receipt. The Complaints Handling Officer must ensure the steps listed in 6.1(b)-(g) are carried out. In doing this, the Complaints Handling Officer must consider and act consistently with the Key Principles set out in 5.1 of this above. The Complaints Handling Officer must liaise with all appropriate parties when dealing with and resolving complaints.

Written complaints can be treated as resolved to the satisfaction of the customer where a customer has been notified in writing of a decision about a complaint, and no response has been received from the complainant.

Oral complaints can be treated as “resolved to the satisfaction of the customer” where:



- a) the complaint has been resolved to the customer's satisfaction "on the spot"; or
- b) the customer has been notified of a decision about a complaint, and no response has been received from the customer, the complaint can be treated as "resolved to the satisfaction of the customer".

If a complainant asks for information about Aquacell's complaints handling methods, staff must refer that request to the Complaints Handling Officer as soon as possible. The Complaints Handling Officer must ensure the customer is provided with a copy of this Policy within 7 business days of the request.

If a complainant asks for assistance in the formulation and lodgement of his/her complaint, staff must refer that request to the Complaints Handling Officer as soon as possible. The Complaints Handling Officer must ensure reasonable assistance is provided to the customer.

Aquacell has determined that the Company Secretary is the Complaints Handling Officer.

Complainant rights for further review

If the Complainant is not satisfied with the outcome of the investigation or the proposed resolution, the Complainant can request that the complaint is investigated by more senior Aquacell representatives.

External dispute resolution – Ombudsman

The Energy and Water Ombudsman is a free and independent service that can provide information, advice and assistance to customers. If a Complainant is not satisfied with Aquacell's response or investigation about a lodged complaint, or wishes to seek independent advice about it, the Complainant may contact the relevant state Energy and Water Ombudsman for assistance or review of the outcome of the complaint.

All our customers in NSW have the right to contact the Energy & Water Ombudsman NSW at any time for independent advice and information. However, we do hope you will contact us directly to allow us the opportunity to rectify any issue. The contact details for the Energy and Water Ombudsman NSW are below:

Energy & Water Ombudsman NSW (EWON)

Freecall: 1800 246 545

Freefax: 1800 812 291

Online: <https://www.ewon.com.au/>

Email: complaints@ewon.com.au

Mail: Reply Paid 86550, Sydney South NSW 1234

The Complaints and Disputes Register

The Complaints Handling Officer must ensure that a Complaints and Disputes Register is established, maintained and kept up to date. The Register is comprised of a copy of each Complaint Report (refer Attachment A).

At a minimum, the Register must include the following information about every complaint and/or dispute that is received:

- Date complaint made/dispute notified;
- Nature of complaint/issue;
- Date resolved;



- How resolved;
- Was dispute referred to Ombudsman or arbitrator;
- Does complaint/dispute indicate a recurring or systemic issue;
- If yes, action taken to ensure issue does not recur/that systemic issue addressed.

The Complaints Handling Officer must periodically review the Register amongst other things, to check that:

- complaints are being handled appropriately, including in accordance with this policy, and within the required timeframes;
- systemic or recurring complaints are being identified, and that the cause of those complaints is being identified and remedied.

Review against Documented Performance Standards

The Complaints Handling Officer must establish documented performance standards against which adherence to this policy can be tested. Those standards must be based on the requirements of this policy. The Complaints Handling Officer must review the adequacy and appropriateness of those standards, and amend them as necessary from time to time.

Periodically (at least annually), the Complaints Handling Officer must review the operation of the policy against the documented performance standards and report the outcome of this review to

Performance Standards

Aquacell is committed to resolving customer complaints in an efficient and timely manner. Minimum performance standards are documented in Appendix B.

8. TRAINING

All staff, regardless of their role in Aquacell, may have direct contact with customers. For this reason, all staff are made aware of this complaints procedure.

Aquacell values customer service highly, and customer service experience is typically taken into account when recruiting new employees. Where a new employee has limited experience in liaising with customers, they are coached and mentored by a more experienced staff member. This mentoring is designed to ensure that all interactions with customers, inclusive of complaints, are conducted in a courteous and professional manner.

Aquacell may also use external training resources where a specific need is identified.



Attachment A – Complaint Report

1.	<i>Date of this Report</i>	
2.	<i>Date complaint made / dispute notified</i>	
3.	<i>Date resolved</i>	
4.	<i>How resolved</i>	
5.	<i>Was complaint / dispute referred to arbitration or the Ombudsman Service</i>	
6.	<i>Does complaint / dispute indicate a recurring or systemic issue</i>	
7.	<i>If yes, what action was taken to ensure the issue does not recur / that systemic issue has been addressed</i>	
8.	<i>Date by which remedial action must be completed</i>	
9.	<i>Date remedial action completed</i>	
10.	<i>Who is responsible for ensuring this action is carried out</i>	
11.	<i>Date by which this action must be completed</i>	
12.	<i>Date action completed</i>	
13.	<i>Is complaint / dispute significant?</i>	
14.	<i>If yes – date notified to APL Board</i>	
15.	<i>If yes – date notified to Operations Group Meeting</i>	



Attachment B – Documented Performance Standards

The following table documents Aquacell’s complaint handling performance standards

No.	Action required	Timeframe
1.	<p>Acknowledge any customer correspondence within 2 working days. Where a resolution cannot be provided in the response, an indication of actions and timeframes must be given.</p> <p>Email or telephone responses will be received by the customer immediately. Responses sent to a postal address may take up to 10 days to arrive, however the response must be sent within 2 working days.</p>	Within 2 working days
2.	Send copy of Aquacell’s Complaints Handling Policy to any Customer who asks for information about its complaints or disputes handling methods	Within 7 business days
3.	Oral complaints not resolved “on the spot” and written complaints to be referred to Complaints Handling Officer	Immediately
4.	Where customer requests assistance in formulation/lodgement of complaint – refer matter to Complaints Handling Officer	As soon as possible
5.	Complaints Handling Officer to write to complainant acknowledging receipt of complaint, and forwarding copy of Aquacell’s Complaints Handling Policy	Within 14 days of receiving complaint
6.	Complaints Handling Officer to advise complainant in writing of outcome and (if complaint not resolved to complainant’s satisfaction) advise complainant in writing of availability of external dispute resolution mechanism, Ombudsman Service (or designated equivalent); and how Ombudsman Service may be accessed.	Within 45 days of receiving complaint
7.	<p>Complaints and Disputes Register – Complaints Handling Officer to:</p> <p>(a) record complaint on Register; and</p> <p>(b) keep Register updated about the complaint</p>	<p>(a) Within 7 days of receipt</p> <p>(b) Within 45 days of receipt</p>