

	<b>POLICY</b>	
<b>COMPLAINTS MANAGEMENT AND PROCEDURES POLICY</b>		
<b>CONTROLLER: GENERAL COUNSEL</b>		<b>OWNER: COMPLIANCE ADMINISTRATOR</b>
<b>REVIEWED: AUGUST 2018</b>		<b>SCHEDULED REVIEW: AUGUST 2021</b>

## 1. **PURPOSE**

Tasracing is committed to managing complaints and feedbacks in an effective, confidential and timely manner.

This policy sets out Tasracing's key principles and concepts of an effective and efficient complaint management system and provides guidance to the public who wish to make a complaint or provide feedback.

## 2. **SCOPE**

This policy applies to all Tasracing employees receiving or managing complaints and feedback from the public made to or about us, regarding our services, employees or complaint handling.

Employee grievances, code of conduct complaints, public interest disclosures and request for information are dealt with through separate mechanisms.

This policy is based on Australian and New Zealand Standard – Guidelines for complaint management in organisations (AS/NZS 10002:2014) and the Tasmanian Ombudsman's – Guidelines to Complaints Handling.

## 3. **DEFINITIONS**

### **DEFINITIONS**

<b>complainant</b>	Person, organisation or their representative making a complaint.
<b>complaint</b>	<p>Expression of dissatisfaction made to or about Tasracing, related to its products, services, employees or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.</p> <p>Complaints not included in this policy:</p> <ul style="list-style-type: none"> <li>• Employee grievances (see Workplace Bullying, Discrimination &amp; Harassment policy);</li> <li>• Public interest disclosures (see Whistleblower</li> </ul>

	<p>policy);</p> <ul style="list-style-type: none"> <li>• Code of Conduct complaints (see Tasracing's Code of Conduct); and</li> <li>• Request for information (see Right to information policy).</li> </ul>
<b>complaint management system</b>	Encompasses all aspects of the policies, procedures, practices, employees, hardware and software used by Tasracing for the management of complaints.
<b>feedback</b>	Opinion, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly to or about Tasracing, its products, employees or its handling of complaints

#### 4. **EFFECTIVE COMPLAINTS HANDLING PRINCIPLES**

Tasracing has adopted the 10 principles of effective complaints handling as set out in the Tasmanian Ombudsman's Guidelines for Complaint Handling. The adopted principles are outlined in Annexure A.

Tasracing's complaint management handling procedures are intended to:

##### **A. Enable complaints**

**Frontline complaints handling – early resolution** Our complaints handling process can be accessed via Tasracing's Corporate website under the '**Contact Us**' section.

Where possible we will resolve the complaint at first contact. Our employees are empowered to resolve complaints as relevant to their roles and responsibilities, and with as little formality as possible. We will protect the identity of people making complaints in accordance to Tasracing's privacy policy.

**Formal complaint** If a complaint cannot be resolved at first contact, the complainant will be directed to Tasracing's Corporate website to lodge a formal complaint.

To lodge a formal complaint, the complainant can complete the Complaints/Feedback Form online or email or post the completed form to the Compliance Administrator:

- [enquiries@tasracing.com.au](mailto:enquiries@tasracing.com.au); or
- PO Box 730 Glenorchy TAS 7010

## **B. Respond to complaints**

**Initial assessment** We will send an acknowledgement to the complainant within 3 business days if a formal complaint is lodged.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. We aim to address and resolve the complaint within 10 business days.

If we are not able to resolve the complaint within this timeframe, we will explain the reason for the delay and advise them of a new timeframe and keep them informed of the progress.

**Objectivity and fairness** We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any employee member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

**Providing reasons for decisions** Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them of:

- the outcome of the complaint and any action taken;
- the reason/s for our decision;
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant, such as an external review by the Tasmanian Ombudsman if we were unable to resolve the complaints to their satisfaction.

**C. Accountable and promote organisation learning**

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling officer and/or senior management. We are committed to improving effectiveness and efficiency of our complaint management system and will regularly review the complaints management system and complaint data.

**5. EXTERNAL REVIEW**

Where a complainant does not accept a resolution offered by Tasracing and wishes to pursue the matter, that person will be advised that they will have a right and lodge a complaint with the Tasmanian Ombudsman [https://www.ombudsman.tas.gov.au/making\\_a\\_complaint](https://www.ombudsman.tas.gov.au/making_a_complaint). However the Tasmanian Ombudsman cannot investigate a complaint until the complainant has attempted to resolve the issue with Tasracing in the first instance.

**6. RESPONSIBILITIES**

<b>Audit &amp; Risk Committee (ARC)</b>	<ul style="list-style-type: none"><li>• Promote a culture that values complaints and their effective resolution.</li></ul>
<b>Executives (CEO &amp; CFO)</b>	<ul style="list-style-type: none"><li>• Provide adequate support and direction to key employees responsible for handling complaints.</li><li>• Encourage all employees to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li><li>• Encourage employees to make recommendations for system improvements.</li><li>• Recognise and reward good complaint handling by employees.</li></ul>
<b>Manager responsible for complaint handling (GC &amp; Compliance Administrator)</b>	<ul style="list-style-type: none"><li>• Establish and manage the complaint management system.</li><li>• Provide quarterly reports to the ARC on issues arising from complaint handling work, complaints data and improvements implemented where appropriate.</li><li>• Train and empower employees to resolve complaints promptly in accordance with this policy.</li><li>• Encourage employees that manage complaints to provide suggestions on ways to improve Tasracing's complaint management system.</li><li>• Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li><li>• Assist the employee dealing with the complaint to ensure timeframes and processes are met in accordance with this policy.</li><li>• Keep records of complaints on a Complaints Register.</li></ul>

<p><b>All Tasracing Employees</b></p> <p><b>(including employees whose duties include complaint handling)</b></p>	<ul style="list-style-type: none"> <li>• Understand and comply with this policy and associated complaint handling practices.</li> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Assist people to make a formal complaint, if needed.</li> <li>• Unless the complaint was resolved at first point of contact, employees must keep record of the complaint and its supporting information.</li> <li>• Employees must keep comprehensive records about: <ul style="list-style-type: none"> <li>- how the complaint was managed;</li> <li>- outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and</li> <li>- any outstanding actions that need to be followed up.</li> </ul> </li> <li>• Ensure that outcomes are properly implemented, monitored and reported to the Compliance Administrator.</li> <li>• The employee handling the complaint must advise the complainant of: <ul style="list-style-type: none"> <li>- the outcome of the complaint and any action taken;</li> <li>- the reason/s for the decision;</li> <li>- the remedy or resolution/s that has been proposed or put in place, and</li> <li>- any options for review that may be available to the complainant, such as an external review by the Tasmanian Ombudsman where the complaint was unable to resolved to the complainant's satisfaction.</li> </ul> </li> </ul> <p>Provide suggestions to Management on ways to improve the organisation's complaints management system.</p>
---	---

**7. ANONYMOUS COMPLAINTS**

Tasracing accepts anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

**8. VEXATIOUS COMPLAINTS**

Vexatious complaints, such as complaints made or pursued without reasonable grounds or initiated to harass or annoy or cause delay or detriment, containing inappropriate or offensive language or for other wrongful purpose will not be considered.

Tasracing reserves the right to decline or discontinue dealing with a complaint if the complainant's arguments are unreasonable.

**9. NO FEE**

There is no fee to lodge a complaint/feedback form.

**10. NON-COMPLIANCE**

Incidents of wilful non-compliance with this policy are considered to be serious and will be dealt in accordance with Tasracing's performance management process.

**11. POLICY REVIEW CYCLE**

The ARC is responsible for approving this policy. This policy is to be reviewed and endorsed by the ARC every 3 years, or when there is a significant change to the external environment or internal organisational structure.

**12. REFERENCES**

- AS/NZS 10002:2014 – Guidelines for complaint management in organisations
- Ombudsman Tasmania – Guidelines to Complaints Handling (version January 2013)
- Privacy policy

**13. DOCUMENT CONTROL**

<b>Date</b>	<b>Version</b>	<b>Author</b>	<b>Approved by</b>
August 18	1	Compliance Administrator & General Counsel	Acting CEO
29 August 18	1	Compliance Administrator & General Counsel	ARC



## Annexure A

### 10 principles of effective complaints handling

1. **Customer focus** – Tasracing is committed to the effective complaint handling and values feedback through complaints.
2. **Visibility** – information about how and where to complain is well publicised on our Tasracing Corporate website under the 'CONTACT US' section.
3. **Accessibility** – Tasracing will make the complaints process easy and accessible for any person wishing to make complaint.
4. **Responsiveness** – Tasracing will acknowledge complaints promptly, assess and prioritise complaints in accordance to the urgency, and keep the complainant informed throughout the process.
5. **Objectivity and fairness** – Tasracing will ensure that all complaints are dealt in an equitable, objective and unbiased manner.
6. **Confidentiality** – Tasracing will keep personal information relating to the complaint confidential.
7. **Remedy** – if a complaint is upheld, Tasracing will provide a remedy.
8. **Review** – Tasracing will provide the complainant with information on how the complaint is reviewed internally or how it can be reviewed externally.
9. **Accountability** – Tasracing's complaints handling process is clearly established and Tasracing's appointed complaints officer (being the Compliance Administrator) will report all complaints to relevant managers and executives.
10. **Continuous Improvement** – Tasracing will review each complaint and use it as an opportunity to improve.