

	<b>POLICY</b>	
<b>COMPLAINTS MANAGEMENT AND PROCEDURES POLICY</b>		
<b>CONTROLLER: GC&amp; CS</b>		<b>OWNER: CEO</b>
<b>REVIEWED: MARCH 2020</b>		<b>SCHEDULED REVIEW: MARCH 2023</b>

## 1. **PURPOSE**

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

This Complaints Management and Procedures Policy (**policy**) sets out Tasracing's key principles and concepts of an effective and efficient complaint management system and provides guidance to our employees on how to respond to and prioritise complaints.

## 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.

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 for Complaints Handling (January 2013)*.

## 3. **DEFINITIONS**

### **DEFINITIONS**

<b>complainant</b>	Person, organisation or their representative making a complaint.
<b>complaint</b>	Expression of dissatisfaction made by a member of the public 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.
<b>complaint/feedback form</b>	Can be found on Tasracing's intranet, Tasracing's Corporate website and annexed to this policy ( <b>Annexure C</b> )
<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 (including health and safety concerns), made directly or indirectly, explicitly or implicitly to or about Tasracing, its products, employees or its handling of complaints from a member of the public.
<b>Formal Complaints Report (internal use)</b>	To be completed by an employee when a complaint/feedback could not be resolved at first point of contact or it needs to be escalated to the Complaints Manager ( <b>Annexure B</b> )

#### 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.

##### 4.1 **INFORMAL COMPLAINTS & FEEDBACKS PROCEDURE**

**Enable complaints** Complaints can be lodged in variety of ways, including in person, over the phone and in writing via email and letter.

**Frontline complaints handling – early resolution** Employees are empowered to resolve complaints and feedbacks as relevant to their roles and responsibilities, and with as little formality as possible to encourage early resolution.

Complaints/feedbacks should be managed well from the beginning to minimise unnecessary delays, misunderstandings and unrealistic expectations.

Our aim is to resolve the complaint at first contact where possible.

##### **Respond to complaints**

**Initial assessment** To minimise unnecessary delays employees should:

- acknowledge complaints/feedback promptly;
- address the respond to complaint/feedback in accordance to urgency;
- assess whether the matter requires escalation to the Complaints Manager due to severity, health and safety implications or unreasonable

complainant conduct;

- keep the complainant informed throughout the process; and
- inform the complainant of the outcome, including decisions relating to remedies.

If the matter cannot be resolved at the first point of contact:

- direct the complainant to Tasracing's complaints handling process located on Tasracing's Corporate website under the "**Corporate – Complaints and feedback**" section to complete the Complaint/Feedback Form; and
- Complete the Formal Complaint Report (internal use) and refer the matter to the Complaints Manager as soon as possible. The matter will then be registered in a central Complaints Register.

Keep a record of the complaints you receive, the action taken, decisions made and the outcome.

**Objectivity, fairness and confidentiality**

All complaints must be addressed with integrity and in an equitable, objective and unbiased manner.

The person handling a complaint must be different from any employee member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, must 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 who is not in a position of conflict.

The identity of the person making the complaints must be protected in accordance to Tasracing's privacy policy and should only be used for the purposes of addressing the complaint and any follow up actions.

**4.2 FORMAL COMPLAINTS & FEEDBACKS PROCEDURE**

**Formal  
complaint/feedback**

A complainant may:

- elect to submit a formal complaint by lodging a completed Complaints/Feedback Form to the Complaints Manager via email or post:
  - [enquiries@tasracing.com.au](mailto:enquiries@tasracing.com.au);
  - PO Box 730 Glenorchy TAS 7010; or
- request that the informal complaint/feedback be referred to more senior staff for investigation and resolution.

In addition to the above circumstances, if a complaint cannot be resolved at first contact the matter should be referred to the Complaints Manager.

**Information Required**

To empower the Complaints Manager to resolve the complaint/feedback, complete the Formal Complaints Report (**Annexure B**) and provide the necessary information to the Complaints Manager as soon as possible.

**Complaints Manager's  
role**

The Complaints Manager will send an acknowledgement to the complainant within 3 business days on receipt of a formal complaint being lodged.

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

If the matter is unable to be resolved within this timeframe, the Complaints Manager will explain the reason for the delay and advise the Complainant of a new timeframe and keep them informed of the progress.

Following consideration of the complaint and any investigation into the issues raised, the Complaints Manager will contact the person making the complaint and advise them of:

- the outcome of the complaint and any action

taken;

- the reason/s for the decision;
- the remedy or resolution/s that Tasracing has proposed or put in place, and
- options for review that may be available to the complainant, such as an external review by the Tasmanian Ombudsman if Tasracing was unable to resolve the complaint to the complainant's satisfaction.

### **4.3 ACCOUNTABILITY AND CONTINUOUS IMPROVEMENT**

Employees are required to follow up on the implementation of remedies and proposed improvement practices and report them to the Complaints Manager.

Tasracing is 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 has a right to lodge the complaint with the Tasmanian Ombudsman. Further information can be found at - [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**

Tasracing expects employees at all levels to be committed to fair, effective and efficient complaint handling.

### **CEO**

- Promote a culture that values complaints and their effective resolution.
- Establish a complaints management policy and procedures.
- Promote awareness of the complaints management policy and procedures and encourage all employees to make

recommendations for system improvement.

- Promote a culture that values complaints and their effective resolution.
- Provide adequate support and direction to key employees responsible for handling complaints.
- Ensure that information about the complaints management policy is easily accessible to the members of the public and is communicated in an easy to understand manner.
- Recognise and reward good complaint handling by employees.
- Ensure there is a process for regular reporting on complaints management.

### **Complaints Manager**

(GC&CS has been appointed as the Complaints Manager)

- Establish a process of performance monitoring, evaluation and reporting.
- Provide regular reports to the CEO on issues arising from complaint handling work, complaints data and improvements implemented where appropriate.
- Train and empower employees to resolve complaints promptly in accordance with this policy.
- Encourage employees that manage complaints to provide suggestions on ways to improve Tasracing's complaint management system.
- Encourage all staff to be alert of complaints and assist those responsible for handling complaints to resolve them promptly.
- Analyse the complaints data to identify systemic, recurring and single incident problems and trends.
- Continuously improve the effectiveness and efficiency of the complaints management system.
- Keep records of complaints on a Complaints Register.

### **Business Managers**

- Ensure that staff are aware of Tasracing's complaints management system, including this Policy.
- Liaise with the Complaints Manager on complaints/feedback

matters.

- Ensure that the monitoring of the complaints management system is undertaken and recorded, and any corrective action is taken to prevent a problem from reoccurring.
- Provide feedback to the CEO and Complaints Manager on issues arising from complaints and ways to improve Tasracing's complaints management system.

### **All Tasracing Employees**

- Understand and comply with this policy and associated complaint handling practices.
- Treat all people with respect, including people who make complaints.
- Assist people to make a formal complaint, if needed.
- Employees must keep comprehensive records about:
  - how the complaint was managed;
  - 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
  - any outstanding actions that need to be followed up.
- The employee handling the complaint must advise the complainant of:
  - the outcome of the complaint and any action taken;
  - the reason/s for the decision;
  - the remedy or resolution/s that has been 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 where the complaint was unable to resolved to the complainant's satisfaction.
- If the complaint/feedback cannot be resolved at the first point of contact, the employee should assist the complainant to

make a formal complaint/feedback by referring them to the complaints and feedback section on Tasracing's website or requesting them to complete the complaints and feedback form, and complete the Formal Complaints Form and provide the necessary information to the Complaints Manager.

- Provide suggestions to Management on ways to improve the organisation's complaints management system.

**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. COMPLAINTS NOT INCLUDED IN THIS POLICY**

Complaints not included in this policy are:

- (a) Employee grievances (see Workplace Bullying, Discrimination & Harassment policy and Code of Conduct);
- (b) Public interest disclosures (see Public Interest Disclosure Policy & Whistleblower policy);
- (c) Employee's identification of work, health and safety matters (see Work Health and Safety Issue Resolution Procedure); and
- (d) Request for information (see Right to information policy).

## 11. **NON-COMPLIANCE**

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

## 12. **POLICY REVIEW CYCLE**

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

## 13. **REFERENCES**

- *AS/NZS 10002:2014 – Guidelines for complaint management in organisations*
- Ombudsman Tasmania – Guidelines to Complaints Handling (version January 2013)
- Privacy policy
- Workplace Bullying, Discrimination & Harassment policy
- Code of Conduct
- Public Interest Disclosure Policy and Whistleblower Policy
- Right to Information Policy
- Work Health and Safety Issue resolution Procedure

## 14. **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
10 March 2020	2	General Counsel & Company Secretary (GC&CS)	CEO

## 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.

# Formal Complaints Report

Employees are empowered to resolve complaints at first point of contact to encourage early resolution. If you feel that the complaint cannot be resolved due to unreasonable complainant conduct or the matter requires escalation due to severity and health and safety implications, please refer the matter to the Complaints Manager for investigation, resolution and any other appropriate action.

To assist with the handling of the complaint please complete and return this form to the Complaints Manager.

<b>First point of contact</b> (Name and title)	
<b>Frontline Employee</b> (Name and title) (if different from first point of contact)	
<b>Name of Complainant</b>  <b>Contact details:</b> Email Phone Number Address	

**Description of Complaint**

<b>Details of Complaint</b>	
<b>Issues raised by complaint</b>	
<b>Date of the complaint</b>	

Steps taken to address the complaint	
Outcome sought by the complainant	
Any other information required for the Complaints Manager to properly respond to the matter	

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**To be completed by the Complaints Manager**

Date of the formal complaint report was referred to the Complaints Manager			
Investigation			
Resolution			
Any undertaking or follow up action required, if <u>so</u> has the relevant actions been completed?			
Date Complainant notified of outcome		Was the Complainant satisfied with the outcome?	
		<i>Was the complainant advised of their right to escalate the complaint to the Tasmanian Ombudsman</i>	
Has the matter been referred to the Ombudsman? If so, what were his recommendations			
Complaint No:		Close date of matter	
Reviewed By		Date	

## Annexure C

(External Use)

### COMPLAINTS AND FEEDBACK FORM

Thank you for taking your time to fill in this form. We value your feedback and will use it to improve our services.

**Please fill in all fields for us to process the complaint/feedback**

First name		Last name						
Address		State		Post code				
Email								
Phone No								
Does the matter relate to a health and safety issue?	YES		NO					
Are you associated with the racing industry in Tasmania? If YES, what is your involvement?								
Have you contacted a person at Tasracing in relation to the matter? If so, who and what was the outcome?								

#### Complaints / Feedback Details

Please describe in detail the issue that is subject of the complaint/ feedback, a statement of facts giving rise to the complaint and what outcome or actions you are seeking. Attach

(Type text here)
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any information required to properly respond to the matter.

**Privacy Statement:** By submitting this form you acknowledge and understand the way Tasracing uses and discloses your personal information as set out in our [Privacy Statement](#).