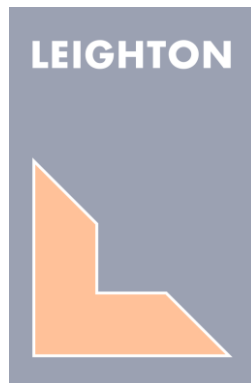




Appendix A to the Community Involvement Plan (CIP)



Complaints Management Protocol

Rev	Date	Prepared	Reviewed	Approved	Comments
A	7 Nov 2010	RL	KG		Draft for RTA and DoP review
B	22 Dec 2010	RL	KG		Draft incorporating DoP comments
C	28 Jun 2011	SM			Reviewed as part of periodic CIP review



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Glossary of terms

CEMP	Construction Environmental Management Plan
CIP	Community Involvement Plan
CNIS	Construction Noise Impact Statement
CNVMP	Construction Noise and Vibration Management Plan
Complaint	Expression of dissatisfaction made to an organisation, related to its products, or its processes, where a response or resolution is explicitly or implicitly expected
Complainant	Person, organisation or its representative, making a complaint
OEH	Office of Environment and Heritage (formerly DECCW)
DoPI	Department of Planning and Infrastructure
EPL	Environment Protection Licence
ICNG	<i>Interim Construction Noise Guidelines</i> (DECC, 2009)
ICNVF	Independent Community Noise and Vibration Facilitator
MCoA	Minister's Conditions of Approval
NCA	Noise Catchment Area
NML	Noise Management Level
OOHW	Out of Hours Work

1 Complaints Management Protocol

1.1 Introduction

A principal objective of the construction strategy for the M2 Upgrade Project is to carry out the works in a safe, timely and efficient manner, ensuring impacts are minimised through the provision of appropriate management measures. Due to the complex nature of the project significant construction activity is required over a two year period. This involves multiple construction sites operating concurrently and a considerable amount of work outside standard construction hours. Potential impacts on stakeholders, including motorway users and the corridor community, are likely to result in complaints.

This protocol describes the procedure for recording, responding to and reporting on complaints. It is an attachment to the Hills M2 Upgrade Project Community Involvement Plan and supplements the information contained within that plan.

1.2 Complaints Management Protocol Requirements

This Complaints Management Protocol is an Appendix to the Hills M2 Upgrade Community Involvement Plan and should be read in conjunction with that document. It has been developed in accordance with Condition 5.3 of the Minister's Conditions of Approval (MCoA) and the Australian Standard for complaints handling in organisations, AS 4269, now updated to ISO 10002:2006.

This protocol will be reviewed and updated if necessary in order to comply with the requirements of the Environment Protection Licence that has been applied for under the Protection of the Environment Operations Act 1997 (POEO Act).

Periodic reviews will also be conducted in order to capture any improvements in process that may emerge from the internal auditing and continual improvement process.

1.3 Objectives

The objectives of the Hills M2 Upgrade Project's approach to complaints management align with ISO 10002:2006. They are to:

- provide a complainant with access to an open and responsive complaints handling process;
- enhance the ability of the project team to resolve complaints in a consistent, systematic and responsive manner, to the satisfaction of the complainant and the project team;
- enhance the project team's ability to identify trends and eliminate causes of complaints;
- help the project team create a community-focused approach to resolving complaints, and encourage personnel to improve their skills in working with the community; and
- provide a basis for continual review and analysis of the complaints-handling process, the resolution of complaints and process improvements made.

1.3 Mechanisms for making complaints

A number of mechanisms have been established to facilitate the receipt of complaints. These include:

1.3.1 Telephone complaints line

The project team has established a telephone complaints/enquiries line. This free call service has been well publicised in the project area and it will be responded to by a project team member during the hours that construction activity is taking place.

The information/complaints free call telephone number is **1800 196 266 (option 2)**.

1.3.2 Postal address

A postal address has been publicised where complaints and enquiries may be sent.

1.3.3 Email address

The project team has established an email address to receive complaints/enquiries. This address has been well publicised in the project area and emails received will be responded to within the required timeframe. The email address is **enquiries@hillsm2upgrade.com.au**

1.4 Communicating complaints receiving mechanisms

The mechanisms for receiving complaints have been widely advertised on all project information tools throughout and following the environmental impact assessment process. They include:

1.4.1 Project information materials

Project contact details for making complaints and enquiries are provided on all project related printed materials including:

- Works notifications
- Community updates
- Site signage
- Project information posters

1.4.2 Newspaper Advertising

Project contact details for making complaints and enquiries are included in all the public advertisement placed in local newspapers that are regularly circulated within the project area. These include:

- Hills Shire Times
- Rouse Hill Times
- North Shore Times
- Northern District Times
- Parramatta Advertiser
- Hornsby Advertiser

Project contact details were also placed in public notices in Sydney metropolitan daily newspapers during the environmental assessment process, including:

- Sydney Morning Herald
- Daily Telegraph
- Koori Mail and the National Indigenous Times

1.4.3 Project Website

Information about making complaints and enquiries is provided on the home page of the project web site. A specific menu tab give ready access to information about how members of the public can make a complaint on the telephone complaints line, and how complaints made by members of the public will be processed. The project website address is www.hillsm2upgrade.com.au

1.5 Responding to complaints

In the first instance, all complaints and enquiries are to be directed to the Community Relations team who will respond to the complainant and co-ordinate required actions in liaison with the appropriate project team members.

1.5.1 Investigating and responding to complaints

The project team led by the Community Relations Manager will:

- investigate the relevant circumstances and information surrounding a complaint
- explain the results of this investigation to the complainant
- identify if there are any reasonable and feasible actions that could correct the problem and prevent future reoccurrences
- convey the decision or any action taken to the complainant

1.5.2 Tracking of complaints

The Community Relations team will enter details into the Consultation Manager Database to ensure that a record of the complaint can be tracked from its initial receipt through the entire process until the complainant is satisfied or a final decision is made.

1.5.3 Response time frames

Receipt of each complaint by telephone is acknowledged immediately or not later than two hours from the time of the call. Notification of receipt of email/written correspondence will be provided to the complainant within one working day. People making contact will be advised of the process for following up their enquiry and/or investigating and seeking to resolve their complaint, as per the following:

- A detailed written and/or emailed response will be provided no later than five working days.
- A detailed response to a complaint received by telephone will be provided no later than two working days.

1.6 Training and support of complaints management personnel

The community relations team will take the lead in receiving complaints and responding to complainants. These personnel are experienced in complaint management and their performance is regularly reviewed by the Community Relations Manager. The Community Relations Manager will also identify and resource any training needs within the community relations team and amongst the wider project team who may have contact with complainants. Regular meetings of the community relations team provide a forum for peer review and a basis for continual improvement in complaint management response.

1.7 Recording of complaints

The community relations team maintain the complaint register. An electronic record of all community and stakeholder interactions, including complaints received and follow up actions, is maintained on the Consultation Manager Database. A complaints record form has also

been developed for managing complaints that may be received in person, such as on site or at public consultation events.

Complaint records will include details of the following:

- the date and time of the complaint;
- the method by which the complaint was made;
- any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- the nature of the complaint;
- the action taken by the project team in relation to the complaint, including any follow-up contact with the complainant;
- if no action was taken by the project team, the reasons why no action was taken;
- whether resolution was reached; and
- whether mediation was required or used.

Details of complaint records that relate to pollution arising from any activity to which the Environment Protection Licence applies will be maintained for at least 4 years after the complaint was made. These records will be provided to any authorised officer of the OEHL who asks to see them.

1.7.1 Protection of Privacy

The Project will comply with the requirements of the *Privacy and Personal Information Act 1998* and relevant NSW Government and RTA guidelines and policies including *RTA Fact Sheet: Your privacy and RTA projects*. Complainants will be asked for permission to record their personal details. They will only be noted with their consent. The complaints register is an electronic database that will be used to record, track and manage complaints. It is a password secured system. Regular update reports from the complaints register do not include personal details. Confidentiality will also be preserved in the event of complaints against personnel. The personal details of such complaints will only be provided to those directly concerned. The complaints register will only be provided to the project's regulators, as requested.

1.8 Reporting requirements

1.8.1 Pollution complaints

The project team will, by 2.00 pm each day, provide a report to OEHL that provides details of all complaints received on the telephone complaints line.

The report must -

- be submitted to the email address nominated from time to time by the EPA
- include a unique identifier number for each complaint together with the details required by condition M4.,
- include the date and time, as reported by the complainant, of the event the subject of the complaint, and
- include the complaints received between 12.00 pm on that day and 12.00 pm on the previous day.

The report will -

- be submitted to the email addresses nominated, and
- include a unique identifier number for each complaint together with all details including the date and time, as reported by the complainant, of the event the subject of the complaint, and subsequent follow up actions.

The report will be copied to the Environmental Representative, Independent Community Noise and Vibration Facilitator, RTA, Hills M2 Upgrade Project and Transurban nominated representatives.

The project team will not submit a report for any reporting period during which there were no complaints.

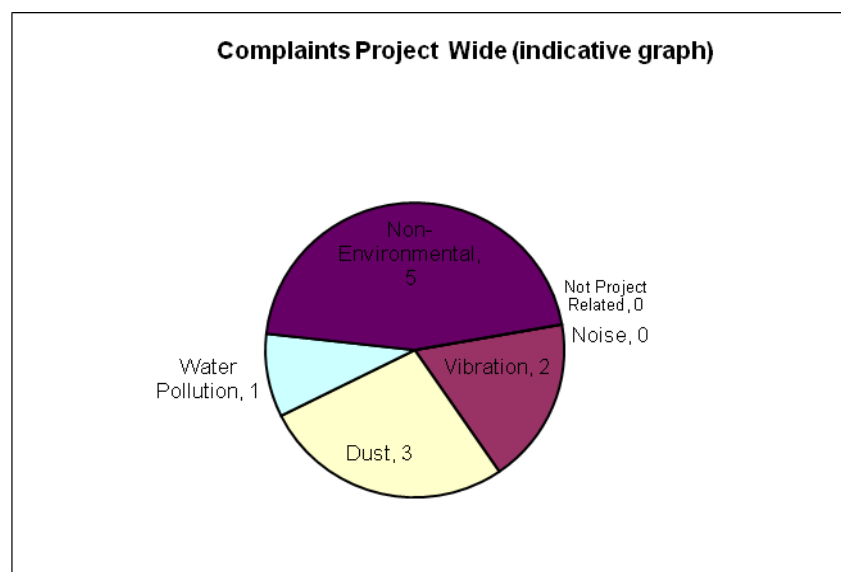
Complaints received over weekends and public holidays will be submitted by no later than 9am on the next working day.

1.8.2 Monthly Complaint Reports

The project team will provide monthly complaints statistics reports that provide a break-down of the complaints into the following categories:

- noise
- vibration
- dust
- water pollution
- air quality
- flora and fauna
- traffic impacts
- public transport
- not project related; and
- property damage.

Figure 2: Indicative graph provided as an example



1.9 Audits

The Hills M2 Upgrade quality team, who are independent of the complaints management function, will perform 6 monthly audits to assess:

- The extent to which this complaints handling procedure is being followed;
- the ability of the existing complaints management processes to achieve the objectives outlined in this procedure;
- the strengths and weaknesses of the complaints-handling procedure; and

- opportunities for improvement in the complaints management process and its outcomes.

The results of these audits will be considered by the Hills M2 Upgrade senior management team in their six monthly management review of the complaints management process.

1.10 Continual Improvement

The senior management team of the Hills M2 Upgrade project will conduct six monthly management reviews of the complaints management process. They are the most equipped members of the Hills M2 Upgrade project management team to assess the efficiency and effectiveness of the complaints management system and to take corrective action if necessary. They will assess and monitor the performance of the complaints management process with a view to identifying opportunities for improvement.

Monitoring data considered by the senior management team will include, but not be limited to the number of:

- complaints received
- complaints resolved
- repeat complaints
- complaints acknowledged before and after the stipulated time
- the results of internal 6 monthly audits
- improvements in procedures due to complaints.

1.10.1 Performance-monitoring criteria

In addition to the monitoring data outlined above, the senior management team will apply the following pre-determined criteria to assess the performance of complaints management:

- whether responsibilities for complaints handling have been appropriately assigned;
- time taken to implement recommendations from complaints-handling audits and previous management reviews;
- the efficiency and effectiveness of any complaints handling training;
- attitude of personnel to complaints handling; and
- the number of suggestions from personnel to improve complaints handling.

1.10.2 Surveys of Complainants

In addition to the regular internal management reviews, feedback will also be sought from complainants in order to determine their level of satisfaction with the complaints management process. This will take the form of surveying a random sample of complainants every six months. Information from this survey process will be fed back to the community relations team along with the project senior management team in order to facilitate the process of continual improvement.