

# Community Complaints Management Process

## SQE-08-PRC-011

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## Related documents

Type	Title
Policy	Whistleblower Policy
Process	Retail Complaints Management Procedure

# 1 Introduction

## 1.1 Purpose

The purpose of this Community Complaints Management Process (CMP) is to ensure Squadron Energy (SQE) is responsive to complaints from stakeholders, and where possible, resolve them in a timely manner. This process provides a framework for managing complaints, including access, response times, resolution and escalation and is aligned with *ISO 10002:2014 Guidelines for complaints handling in organizations*.

## 1.2 Scope

This CMP describes SQE's approach to handling complaints received by stakeholders related to its renewable energy projects and SQE's broader operations.

The CMP addresses complaints in relation to the three phases of a project: development, delivery (including construction) and operations, as well as those complaints which are of a corporate nature.

Where there are specific statutory conditions of consent for handling complaints for a particular project, the consent condition overrides this process.

# 2 Definitions

<b>Complaint</b>	An expression of dissatisfaction made to an organisation, related to its products, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.
<b>Enquiry</b>	An interaction with a person who is seeking information or clarification.
<b>Stakeholder</b>	Any person to whom SQE interact with in the course of conducting business, such as landowners, community members, purchaser.

# 3 Roles and Responsibilities

Role(s)	Responsibilities
<b>Project Stakeholder Engagement and Community Relations Advisors</b>	<ul style="list-style-type: none"> <li>Receiving and managing the resolution of complaints</li> <li>Response times adhered to</li> <li>Escalating relevant complaints</li> <li>Consultation Manager entries</li> <li>Collation of monthly complaints reports</li> </ul>
<b>Project Managers – Development</b>	<ul style="list-style-type: none"> <li>Resolving complaints</li> <li>Response times adhered to</li> <li>Escalating relevant complaints</li> <li>Consultation Manager entries</li> </ul>
<b>Project Managers – delivery (including construction)</b>	<ul style="list-style-type: none"> <li>Resolving complaints</li> <li>Taking remedial actions</li> </ul>

<b>Operations Managers – Operations</b>	<ul style="list-style-type: none"> <li>Resolving complaints</li> <li>Taking remedial actions</li> <li>Reporting to regulators</li> </ul>
<b>Stakeholder Engagement Manager</b>	<ul style="list-style-type: none"> <li>Monthly review of development complaint statistics</li> <li>Corporate complaints Consultation Manager entries</li> </ul>
<b>Head of Stakeholder Engagement and Community Relations</b>	<ul style="list-style-type: none"> <li>Resolve escalated complaints</li> <li>Review all complaint statistics across SQE and identify trends</li> <li>Refer to EMT</li> <li>Implement mitigation measures to reduce complaints</li> <li>Reporting</li> </ul>
<b>EGM Corporate Affairs</b>	<ul style="list-style-type: none"> <li>Address escalated complaints</li> </ul>
<b>Executive Management Team</b>	<ul style="list-style-type: none"> <li>Analysis of trends and structural change to improve performance and reduce complaint frequency</li> </ul>
<b>Environmental Representative (Delivery/Operations)</b>	<ul style="list-style-type: none"> <li>Where there is a condition of approval for an environmental representative, they will be responsible for monitoring environmental performance including complaints management against the relevant management plan</li> </ul>
<b>Australian Energy Infrastructure Commissioner</b>	<ul style="list-style-type: none"> <li>Participate with SQE in resolving complaints that have been unable to be resolved by SQE</li> </ul>

## 4 Approach and Process

This section outlines the approach to managing complaints received during the **development, delivery, and commissioning of a project and then into the operational phase.**

A ‘complaint’ is defined as an interaction with a stakeholder, or community member who expresses dissatisfaction with the company or project activities, staff members and contractors’ actions, or proposed actions.

**An enquiry is not a complaint, rather an approach for clarification or information.**

The CMP:

- outlines the principles recommended for effective managing of complaints;
- details the process for receiving, managing, and resolving the various forms of complaints and feedback from the stakeholders and the community;
- outlines the communication process for addressing and resolving complaints and minimising the chance of recurrence;
- outlines the process of escalation and mediation.

This CMP applies to all complaints directed to SQE staff, contractors and subcontractors relating to the company and its projects.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame, as described in Section 4 of this CMP. People making complaints will be:

- provided with information about our complaints handling process, including, if relevant, any specific procedures for a particular Project;
- provided with multiple accessible ways to make complaints;

- listened to, treated with respect by staff and contactors, actively involved in the complaint process where possible and appropriate;
- provided with reasons for our decision/s and any options for redress or review.

SQE will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

## **4.1 Guiding principles**

SQE applies the following guiding principles when handling complaints:

- **Visibility** – Information about how and where to complain is well publicised.
- **Accessibility** – The process should be easily accessible and understood to all complainants, outlining details of making and resolving complaints. Access to the process is free of charge.
- **Responsiveness** – Complaints are acknowledged to the complainant immediately and addressed promptly in accordance with their urgency.
- **Objectivity** – Complaint should be addressed in an equitable, objective, and unbiased manner through the complaints-handling process.
- **Confidentiality** – Personally identifiable information is only collected where required for the purposes of addressing the complaint and is actively protected from disclosure unless expressly consented to.
- **Customer-focused** – A customer-focused approach is adopted where process is open for feedback and compliant, showing a commitment to resolving complaints by its actions.
- **Accountability** – Clear accountability for and reporting on the actions and decisions with respect to complaints is clearly established.
- **Continual improvement** – The continual improvement of the process and the quality of products should be a permanent objective.

## 5 Receiving Complaints

### 5.1 Channels for receiving project complaints

This section applies to complaints received during the **development, delivery, commissioning** and **operational** phases of our projects.

Each project has a specific telephone number, postal address and email address, which is published on the relevant project webpage and will also be made available via social media platforms where appropriate. These contact channels will be available for the life of a project. Where a project received planning approval and moves into delivery (i.e. construction) and then operations, the relevant project environmental management document or web page will have a statutory complaint management process. Where this is not present, this CMP applies.

**Table 1:** Channels for receiving **project** complaints

Channel	Purpose
<b>Community information line</b>	The telephone number for the registration of complaints about the project
<b>Email address</b>	The email address allows stakeholders and the community to transmit electronic complaints about the project.
<b>Postal address</b>	The postal address allows stakeholders and the community to send written complaints about the project.
<b>Direct contact in meeting</b>	Meetings with stakeholders can elicit complaints in person

### 5.2 Channels for receiving corporate complaints

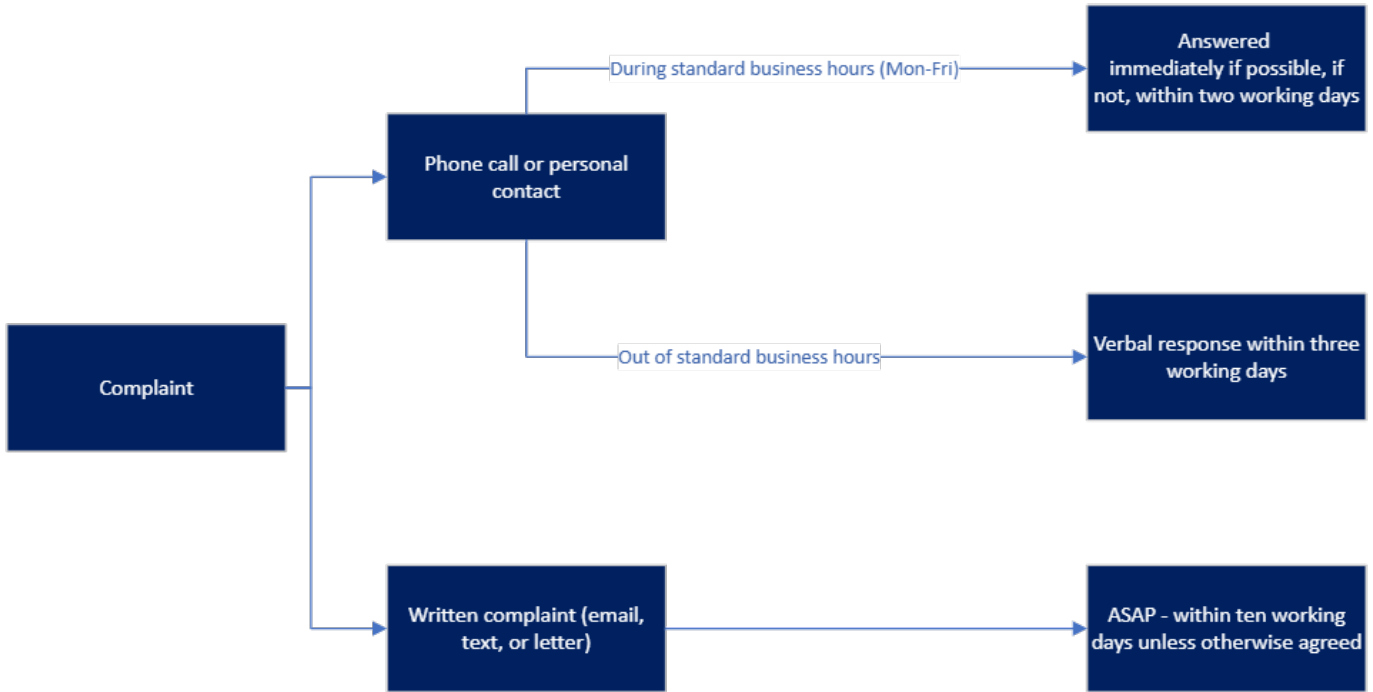
For complaints of a corporate nature, there will be a readily accessible complaints section on the SQE website which will include the telephone number, postal address and email address. This will also be included on social media platforms where appropriate.

**Table 2:** Channels for receiving **corporate** complaints

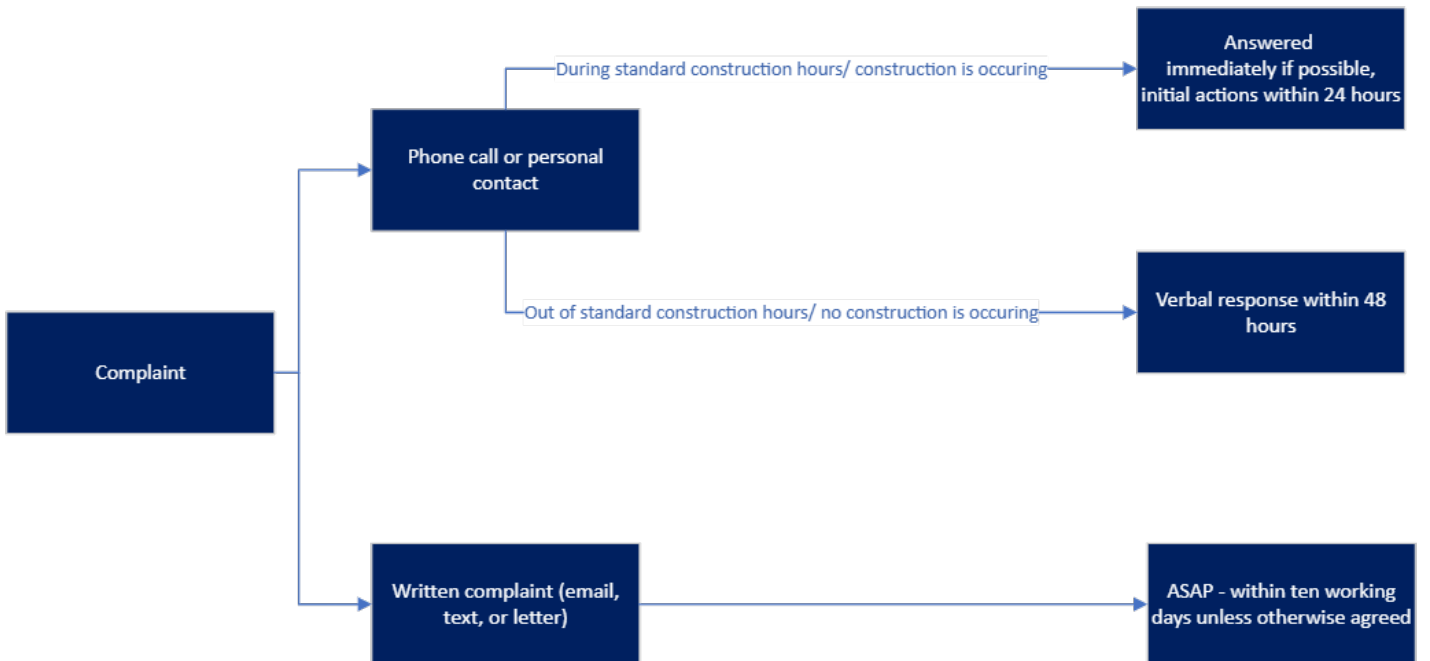
Channel	Purpose
<b>Corporate complaints line</b>	The telephone number for the registration of complaints about SQE not related to a project.
<b>Email address</b>	The email address allows stakeholders and the community to transmit electronic complaints about SQE not related to a project.
<b>Postal address</b>	The postal address allows stakeholders and the community to send written complaints about SQE.
<b>Direct contact in meeting</b>	Meetings with stakeholders can elicit complaints in person
<b>Whistle-blowing (Section 5)</b>	<a href="https://www.yourcall.com.au/report">https://www.yourcall.com.au/report</a> .

### 5.3 Procedure flow diagram

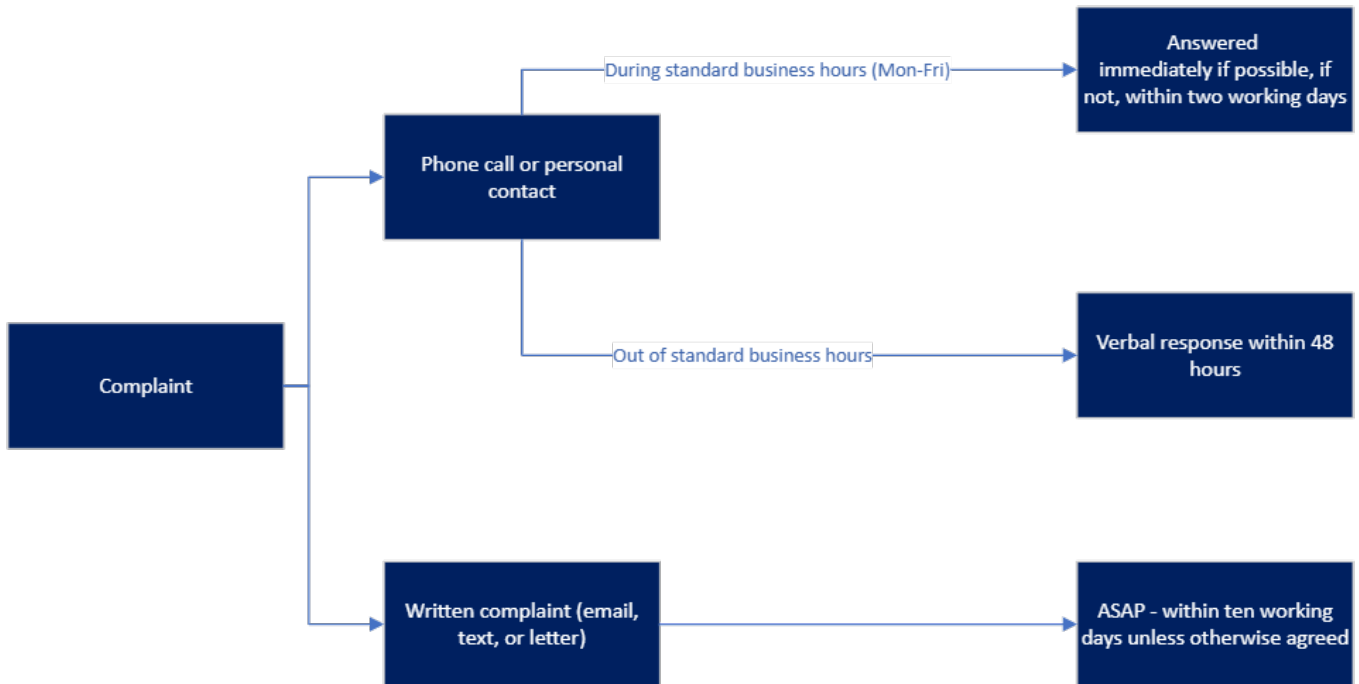
#### 5.3.1 Development phase



#### 5.3.2 Delivery and commissioning phase



### 5.3.3 Operational phase



## 5.4 Registration of complaints

All community complaints are recorded in Squadron Energy's Consultation Manager (CM) database. CM, in its role as SQE's central stakeholder relationship management system, is also used to track the recording, investigation and handling of all community and stakeholder complaints, including those relating to a specific project.

The following details are recorded:

- date and time of complaint;
- whether it is a corporate complaint or related to a project;
- type of communication (telephone, letter, email etc.);
- name, address, contact telephone number of contact or, if no details were provided, a note to that effect;
- an allocated number to the person making complaint, which will remain with them for all their complaints, if any;
- nature of the complaint and issues raised;
- record of operational and meteorological conditions contributing to the comment or complaint;
- the number of people affected in relation to the complaint;
- actions taken in response including follow up contact;
- details of whether resolution was reached;
- any monitoring to confirm that the complaint was satisfactorily resolved.



The Project Manager/Operations Manager is responsible for ensuring the maintenance of CM for each project or operating site. Training will be provided to Project Managers/Operations Managers on how to correctly identify, register, handle and escalate complaints.

The Stakeholder Engagement Manager is responsible for maintaining CM for corporate complaints.

## 5.5 Register reporting

Information contained in Consultation Manager, including the number of complaints received, will be summarised in a monthly report by the Stakeholder Engagement Manager for review by Squadron Energy's EGM Corporate Affairs. During delivery of a project, the project monthly report may also be made available to the Environmental Representative (ER)/Manager, if required. Squadron Energy will protect and maintain the privacy of individuals and follow relevant privacy laws as per our Privacy Policy (<https://www.squadronenergy.com/privacy>).

## 5.6 Register review

Complaints recorded in Consultation Manager will also be reviewed by the Head of Stakeholder Engagement and Community Relations on a monthly basis to:

- ensure records are complete and actioned on a timely basis;
- identify trends and initiate preventive action and proactive strategies.

## 5.7 Publication of complaints registers

Construction projects will publish their complaints register on the project's website if required by regulatory conditions of approval.

Operational projects will publish their complaints register on the asset's website.

A corporate complaints register will be published on the Squadron Energy website.

Complaints will be de-identified to protect the privacy of individuals/complainants.

## 5.8 Responding to complaints

All project complaints will be reviewed by the project or site manager, and if relevant, by the construction contractor before being allocated to the appropriate personnel, responded to and corrective or preventative action initiated. Complaints linked to Approval Conditions will be escalated to subject matter experts who will assess further action and reporting obligations.

Corporate complaints will be referred by the Stakeholder Engagement Manager before being allocated to the appropriate personnel, responded to and corrective or preventative action initiated.

Complaints will be responded to within the nominated timeframes depending on the project stage. Where there are specific project planning approval conditions or management plans relating to complaints, these will override the response times in this document.

**Table 3:** In the development phase – **target** response times for addressing complaints from receipt

Complaint classification	Summary	Timing
Phone call or personal contact	• During standard business hours Monday to Friday	• Verbal response immediately (if possible) to determine the nature of the complaint and at least within two working days.
	• Out of standard business hours	• Verbal response within three (3) working days (if possible)

Complaint classification	Summary	Timing
Written complaint (email, text, or letter)	<ul style="list-style-type: none"> <li>Any written complaint from the community or a stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>Written response as soon as possible but within ten (10) working days unless otherwise agreed with Squadron Energy and the stakeholder.</li> </ul>

**Table 4:** In the delivery and commissioning phase – **target** response times for addressing complaints from receipt

Complaint classification	Summary	Timing
Phone call or personal contact	<ul style="list-style-type: none"> <li>During standard construction hours and during out of construction hours (when construction work is occurring)</li> </ul>	<ul style="list-style-type: none"> <li>Verbal response immediately (if possible) to determine the nature of the complaint and acknowledgement of complaint and initial actions within 24 hours</li> </ul>
	<ul style="list-style-type: none"> <li>Out of standard construction hours (when no construction is occurring)</li> </ul>	<ul style="list-style-type: none"> <li>Verbal response within 48 hours (if possible)</li> </ul>
Written complaint (email, text, or letter)	<ul style="list-style-type: none"> <li>Any written complaint from the community or a stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>Written response as soon as possible but within ten working days unless otherwise agreed with Squadron Energy and the stakeholder.</li> </ul>

**Table 5:** In the operational phase – **target** response times for addressing complaints from receipt

Complaint classification	Summary	Timing
Phone call or personal contact	<ul style="list-style-type: none"> <li>During standard business hours Monday to Friday</li> </ul>	<ul style="list-style-type: none"> <li>Verbal response immediately (if possible) to determine the nature of the complaint and at least within two working days.</li> </ul>
	<ul style="list-style-type: none"> <li>Out of standard business hours</li> </ul>	<ul style="list-style-type: none"> <li>Verbal response within 48 hours (if possible)</li> </ul>
Written complaint (email, text, or letter)	<ul style="list-style-type: none"> <li>Any written complaint from the community or a stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>Written response as soon as possible but within ten working days unless otherwise agreed with Squadron Energy and the stakeholder.</li> </ul>

Note that where there is an approval condition in place for a project, **the response times in that approval condition will override the response time in this CMP**. Where there are no response times noted in an approval condition, the response times in this CMP apply. All telephone complaints received during standard construction hours and during scheduled out of work hours will be answered by Squadron Energy's nominated representative.

Outside of standard construction hours (when no construction work is occurring), callers to the project phone number will be directed to leave a message for a return call from the representative during business hours on the next working day. During construction, the relevant contractor will notify Squadron Energy of any complaints that are anticipated to require longer than five days to resolve. The Squadron Energy Project Manager will document all complaints and ensure that all required follow up action is completed. Squadron

Energy 'Head of Stakeholder Engagement and Community Relations will be advised of any complaint that needs to be escalated or is related to SQE corporate matters not related to the specific project.

## 5.9 Corporate Complaints Response times

**Table 6:** Corporate complaints of a general nature – *target* response times from receipt of complaint

Complaint classification	Summary	Timing
<b>Phone call or personal contact</b>	<ul style="list-style-type: none"> <li>During standard business hours Monday to Friday</li> </ul>	<ul style="list-style-type: none"> <li>Verbal response immediately (if possible) to determine the nature of the complaint and at least within two working days.</li> </ul>
	<ul style="list-style-type: none"> <li>Out of standard business hours</li> </ul>	<ul style="list-style-type: none"> <li>Verbal response within 48 hours (if possible)</li> </ul>
<b>Written complaint (email, text, or letter)</b>	<ul style="list-style-type: none"> <li>Any written complaint from the community or a stakeholder</li> </ul>	<ul style="list-style-type: none"> <li>Written response as soon as possible but within ten working days unless otherwise agreed with Squadron Energy and the stakeholder.</li> </ul>

## 5.10 Complaint escalation process

Squadron Energy and its contractors will endeavour to achieve prompt resolution of matters with fairness, care and understanding. Should there be a failure to come to a satisfactory resolution of a complaint, a response will be provided to the complainant in writing. If the complaint is not resolved by the project team, an external review option is available by escalating the complaint to the Executive General Manager - Corporate Affairs.

Where a complaint still cannot be resolved to the satisfaction of the complainant, an assessment will be conducted in consultation with the Energy Infrastructure Commissioner.

The Commissioner may seek to undertake conciliation as outlined in the commissioner complaint handling process. <https://www.aeic.gov.au/making-a-complaint>

If a project is in construction, unresolved complaints can be referred the Environmental Representative (ER) for resolution. The ER is a statutory position required under a project development consent.

Complaints determined by the Commissioner or ER to be unreasonable will be subject to the guidelines in Managing Unreasonable Complainant Conduct (NSW Ombudsman 2012) - (refer Section 2.4.2).

## 5.11 Complaints related to compliance

Where a complaint relates to an actual or potential non-compliance with the project development approvals, SQE will undertake a detailed investigation. If a non-compliance is identified the details would be communicated to the relevant authorities (e.g. EPA, DCCEEW, DTP...etc) as required.

The relevant authorities may undertake their own investigations at their discretion. If the relevant authorities receive information from a third party about a potential non-compliance, they may communicate this to SQE for further investigation.

## 5.12 Unreasonable or habitual complaints

According to the NSW Ombudsman's guidelines, unreasonable complaint conduct is defined as any conduct which, because of its nature or frequency, raises substantial health, safety, resource, or equity issues for the parties to the complaint. Squadron Energy does not anticipate that there will be a significant number of stakeholders who exhibit this type of behaviour. However, any that do arise have the potential to negatively impact on project team resources and efficiency, as well as on the safety and wellbeing of individual team

members and the stakeholders themselves. To manage unreasonable conduct, Squadron Energy will follow the process and procedures as outlined in Managing Unreasonable Conduct (NSW Ombudsman, 2012). This procedure is followed by all ombudsman offices across Australia in a joint initiative.

<https://www.ombo.nsw.gov.au/guidance-for-agencies/managing-unreasonable-conduct-by-a-complainant>

## 6 Whistleblower policy

Whistleblowers play an important role in identifying and calling out misconduct and harm to consumers and the community. Stakeholders or the community can report any suspected or actual misconduct, or an improper set of affairs or circumstances in relation to Squadron Energy, according to the company's whistleblower policy.

## 7 Audit/Review

A review of this Process and its associated records is required within 24 months from the date it is approved.

## 8 Relevant legislation and standards

Type	Title
Standards	Managing Unreasonable Conduct by a Complainant (NSW Ombudsman, 2021).
Standards	ISO 10002:2014 Quality management – Customer satisfaction – Guidelines for complaints handling in organizations

Squadron Energy is Australia's leading renewable energy company. Proudly Australian owned, our mission is to be a driving force in Australia's transition to a clean energy future by providing green power to our customers.

We develop, operate and own renewable energy assets in Australia.

With proven experience and expertise across the project lifecycle, we work with local communities and our customers to lead the transition to Australia's clean energy future.

Squadron Energy acknowledges the Traditional Owners of Country throughout Australia. We pay our respects to Elders past, present, and emerging.

