

Customer Complaints and Disputes Resolution Policy

1 Purpose

The Corporation is required to implement and maintain a customer dispute resolution process as per Division 4, 110a of the Water Act 1989. The Essential Services Commission Customer Service Code further outlines obligations with respect to customer complaints. Lastly, effective management of customer complaints provides a valuable source of feedback to an organisation to enable continuous improvement in delivery of services from the customer perspective.

This policy outlines the principles and parameters that position South Gippsland Water (SGW) to meet regulatory obligations and manage customer complaint data as an input to continuous improvement in service delivery.

2 Definitions

For the purposes of this policy only, the following shall mean:

Customer: A natural person or legal entity holding an account with the Corporation for water or wastewater services, including trade waste, or their authorised representative.

Complaint: Expression of dissatisfaction made to or about an organization, 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. This does not include a notification made to the business of a reticulation network leak, burst, blockage or spill resolved through reactive maintenance where no other issues are raised but may relate to these where a customer is impacted by these events including an expression of dissatisfaction relating to water quality and supply (including pressure) and sewer odour. When a customer reports a sewer blockage or spill this is not counted as a complaint unless the customer expresses dissatisfaction with the interruption.

Dispute: Unresolved complaints escalated internally or externally, or both.

ESC: Essential Services Commission.

EWOV: The Energy and Water Ombudsman Victoria.

SGW: South Gippsland Water.

Feedback: Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly to or about the organization, its products, services, staff or its handling of a complaint.

Resolution: Any one of the following:

- Agreement reached between the customer and SGW including the complaint being withdrawn by customer;
- Binding decision by external dispute resolution forum, including dismissal or closing the complaint;

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- SGW making a final decision and communicating such to the customer, including a decision that does not support the outcome sought through the complaint.

Response: In the form requested (in writing or verbal), information that:

- Deals with the substance of the complaint, or advises the customer when they will receive such a reply if the complaint is complex;
- Explains the reasons for the decision including details of the legislative or policy basis for the reasons if appropriate;
- Details a complaint escalation process to a senior manager or, if already escalated to that level and the customer remains dissatisfied, information about referral to EWOV and any other relevant external dispute resolution forum;
- Where a matter is being investigated through an external dispute resolution forum, confirms the water business will not recover any monies in dispute until the dispute has been resolved.

Unreasonable Conduct: Focusing on the behaviour and not the person, examples include excessive volumes of contact episodes, unreasonable demands, failing or refusing to identify the issue of complaint despite being capable of doing so, expressing irrational claims and beliefs, conspiracy theories or vexatious complaints, or making threats of harm to self, SGW employees or others, making baseless attacks on intentions ethics or conduct of SGW employees, using abusive language, expressing unreasonable anger, aggression or violence, or lying or being intentionally misleading.

3 Policy

3.1 Policy Statement

This policy is aimed at ensuring a complaint management system operates within SGW to support organisational reputation and the ability to meet service delivery standards through a consistent, fair complaint handling process, and application of complaint data analysis to continuously improve organisational performance.

3.2 Principles

- a) SGW will always aim to resolve customer concerns at the earliest point they become known and prevent them becoming a source of dissatisfaction requiring management of a complaint.
- b) In working to resolve complaints SGW will be transparent, work in good faith and as much as possible communicate directly with customers and other affected parties.
- c) The Corporation will respond to all complaints within 10 working days.
- d) Appropriate front-line staff will usually be responsible for responding to complaints in the first instance, and SGW will ensure all staff receive training in complaint management consistent with AS/NZA 10002:2014 and regulatory requirements.

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- e) A two-level internal escalation process will be in place for customers who request a further internal review of the initial decision, whereby the complaint will be investigated by the Managing Director as a final point of SGW response.
- f) Where a customer has exhausted the SGW escalation process and remains dissatisfied with the response, information about appropriate external dispute resolution forums will be provided, including EWOV.
- g) The Corporation will not attempt to recover any monies which are in dispute, until the dispute has been resolved and upon resolution a minimum of 10 days has lapsed since communication of such.
- h) Disputes relating to technical or economic aspects associated with Trade Waste Agreements, for which efforts to resolve have exhausted the parameters outlined in this policy, are eligible for further dispute resolution treatments and these are outlined in SGW Trade Waste Procedure compliant with the ESC Trade Waste Customer Service Code 2012 and the SGW Trade Waste Customer Charter.
- i) Where any customers or their representatives engage in unreasonable conduct strategies will be implemented to protect the health and safety of SGW employees and ensure equitable levels of time and other resources are expended in responding to the complaint. Strategies may include allocation of a single defined channel for further communication, issuing of conduct guidelines that describe mutual roles and responsibilities and requiring compliance, a decision not to further investigate the complaint (depending on the nature of the matter), or referral to Victoria Police (in the instance of most serious levels of threat or violence).
- j) A Complaint Management System will be in operation consistent with AS/NZS 10002:2014.
- k) Complaint data will be recorded, analysed and reported for the purpose of informing continuous improvement in SGW service delivery.

4 Responsibilities

SGW Employees are responsible for investigating and responding to complaints assigned to them for action and operating consistent with this policy.

General Manager People, Culture and Customer is responsible for:

- Maintaining a Complaint Management Policy; and
- Ensuring SGW employees receive training in obligations associated with the Policy

Managing Director: is responsible for investigating customer complaints as per the Internal Escalation Process where resolution cannot be achieved by the first actioning employee/s.

5 References

South Gippsland Water Customer Charter

South Gippsland Water Trade Waste Customer Charter

Water Act 1989

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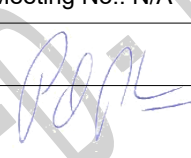
ESC Customer Service Code – Urban Water Businesses August 2020

ESC Trade Waste Customer Service Code – Metropolitan Retail and Regional Water Businesses 2012

SCS-002 Complaints and Dispute Resolution Procedure

STW-001 Trade Waste Procedure

This document is to be reviewed in **January 2024** or earlier as required.
 This document must not be released to external parties without approval by the
 Managing Director.

DOCUMENT APPROVAL		
Board Approval:	Meeting No.: 310	Date: 24/02/2022
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Managing Director Signature:		

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