

Pristine Solar's Complaints Handling Procedure

1. Introduction

1.1 Purpose

This policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- Enable us to respond to issues raised by clients making complaints in a timely and cost-effective way
- Boost public confidence in our administrative process, and
- Provide information that can be used by us to deliver quality improvements in our products, services, staff and complaint handling.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

1.2 Scope

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

Staff grievances, code of conduct complaints (for local councils) and public interest disclosures are dealt with through separate mechanisms.

1.3 Organisational Commitment

This organisation expects staff at all levels to be committed to fair, effective and efficient at complaint handling.

Head of Pristine Solar:

- 1.) Promote a culture that values complaints and their effective resolution.
- 2.) Provide adequate support and direction to key staff responsible for handling complaints.
- 3.) Encourage all staff to be alert to complaints and make recommendations for system improvements.
- 4.) Recognise and reward good complaint handling by staff.

Staff whose duties include complaint handling:

- 1.) Treat all people with respect, including people who make complaints.
- 2.) Assist people make a complaint, if needed.
- 3.) Comply with this policy and its associated procedures.
- 4.) Keep informed about best practice in complaint handling.
- 5.) Provide feedback to management on issues arising from complaints.
- 6.) Provide suggestions to management on ways to improve the organisation's complaints management system.

All Staff:

- 1.) Understand and comply with Pristine Solar's complaint handling practices.

2. Terms and Definitions

Complaint

Expression of dissatisfaction made to or about us, our products, services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- Staff grievances
- Code of conduct complaints
- Responses to requests for feedback about the standard of our service provision [see the definition of ‘feedback’ below]
- Reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of ‘feedback’]
- Requests for information.

Complaint Management System

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

Dispute

An unresolved complaint escalated either within or outside of our organisation.

Feedback

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our products, services or complaint handling where a response is not explicitly or implicitly expected or legally required.

Staff Grievances

A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

Policy

A statement of instruction that sets out how we should fulfil our vision, mission and goals.

Procedure

A statement or instruction that sets out how our policies will be implemented and by whom.

3. Guiding principles

3.1 Facilitate complaints

People Focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

People making complaints will be:

- Provided with information about our complaint handling process
- Provided with accessible ways to make complaints
- Listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- Provided with reasons for our decision/s and any options for redress or review.

No detriment to people making complaints

We 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.

Anonymous Complaints

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

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

No Charge

Complaining to us is free.

Raising a Complaint

If you have a complaint relating to our products, services, staff, an agreement or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required, you can make a complaint to us by:

- a) Calling us on our telephone number as set out in the quote, agreement and website; or
- b) Giving us written notice of this, by post or email in the quote, agreement and website.

The more information provided by the complainant, the more diligent we can be in executing our complaints handling procedure.

Our contact details shall always be available on our website. Customers will be appropriately updated on relevant contact changes.

3.2 Respond to complaints

Early Resolution

Every complaint will be logged and investigated within a reasonable time frame. Where possible, complaints will be resolved at first contact with Pristine Solar. The complainant will be informed as soon as possible that an investigation regarding their complaint has begun.

Responsiveness

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- The complaints process
- The expected time frames for our actions
- The progress of the complaint and reasons for any delay
- Their likely involvement in the process, and

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate). We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

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 staff 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.

Responding Flexibly

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives. We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

Confidentiality

We will protect the identity of people making complaints where it is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by Pristine Solar as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

3.3 Manage the parties to a complaint

Complaints involving multiple agencies

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety and security of our staff, and
- Our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work.

4. Complaint Management System

4.1 Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

4.2 Receipt of Complaints

We will record the complaint in a Complaint Register along with all supporting information. We will also assign a unique identifier to the complaint.

The Register will document:

- The contact information of the person making a complaint (name and contact details)
- Nature of complaint raised by complainant and the outcome/s they want
- Any other relevant information provided
- Actions taken and outcome (Added upon completion)
- Company changes to take place as a result of the Outcome (Added upon completion)

4.3 Acknowledgement of Complaints

We will acknowledge receipt of each complaint promptly, and preferably within 5 business days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

4.4 Initial Assessment and Addressing of Complaints

Initial Assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

Addressing Complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint, we may:

- Give the person making a complaint information or an explanation
- Gather information from the product, person or area that the complaint is about, or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays.

We will communicate (using the most appropriate medium) the outcome of the complaint within 21 days of receipt. Where additional time is required:

- 1.) Complainant will be informed of the need for more time to complete investigation.
- 2.) The investigation will be completed within 45 days of receipt of the complaint.

Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

4.5 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:

- The outcome of the complaint and any action we took
- 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 internal review, external review or appeal.

4.6 Appeal against Decision

When consumers are dissatisfied with the outcome of a complaint, the complaint should be referred to with the relevant Fair Trading or Consumer Affairs office in your state or territory, as follows:

ACT: Office of Regulatory Services
Phone: (02) 6207 3000

SA: Consumer and Business Services
Phone: 13 18 82

NSW: Fair Trading
Phone: 13 32 20

Tas: Consumer Affairs and Fair Trading
Phone: 1300 654 499

NT: Consumer Affairs
Phone: 1800 019 319

Vic: Consumer Affairs
Phone: 1300 558 181

Qld: Office of Fair Trading
Phone: 13 74 68

WA: Consumer Protection
Phone: 1300 304 05

4.7 Closing the complaint, Record keeping and Review

We will keep comprehensive records about:

- How we managed the complaint
- The 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.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

4.8 Externally raised complaints

We will inform people who make complaints about us to any energy ombudsman or consumer affairs body. Along with this, we will inform Code Administrators (Clean Energy Council) of these specific complaints.

5. Accountability and Learning

5.1 Analysis and Evaluation of Complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Reports will be run on:

- The number of complaints received
- The type of complaints received
- The number of resolved complaints
- the outcome of complaints, including matters resolved at the frontline

This data will be provided to the Code Administrator (Clean Energy Council) on an annual basis.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to Pristine Solar's CEO and senior management for review.

5.2 Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data, and

Acknowledgements

The development of this policy has been informed by the following:

- Australian and New Zealand Standard Guidelines for complaint handling in organizations AS/NZS 10002:2014
- NSW Ombudsman Effective complaint handling guidelines, 2nd Edition, December 2010
- Victorian Ombudsman Councils and complaints - a good practice guide, February 2015
- Joint publication of the NSW Ombudsman and Department of Local Government Complaints Management in Councils Practice note no. 9, revised July 2009
- Ombudsman Western Australia Guidelines on complaint handling, November 2010
- Commonwealth Ombudsman Better Practice Guide to Complaint handling 1, April 2009
- NESTA Grumbles Gripes and Grievances The Role of Complaints in Transforming Public Services, April 2013
- Scottish Public Services Ombudsman SPSO Statement of Complaint handling Principles, 2011
- The British and Irish Ombudsman Association Guide to Principles of good complaint handling, 2007
- NSW Ombudsman Managing Unreasonable Complaint Conduct – a Model Policy and Procedure 2012
- Victorian Ombudsman Good Practice Guide, November 2007
- Disability Services Commissioner Victoria Good Practice Guide and Self Audit Tool, 2nd Ed. 2013.