

# Complaints Handling Procedure

The complaint handling procedure is intended to enable the CIT Water Exchange to respond to issues raised by customers making complaints in a timely and cost-effective way.

## 1 Scope

This procedure applies to all staff receiving or managing complaints from customers made to or about the CIT Water Exchange, regarding products, services, staff, and complaint handling.

Staff grievances, code of conduct complaints and public interest disclosures are dealt with through separate mechanisms.

This procedure applies to complaints received from current clients and proposed clients regarding water market intermediary services provided by CIT Water Exchange, including complaints relating to marketing, brokerage services, water market transactions, client communications, conflicts of interest, fees and charges, and compliance with regulatory obligations.

## 2 Organisational commitment

CIT Water Exchange expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

CIT Water Exchange will deal with complaints in good faith and make a genuine attempt to resolve complaints within 20 business days of receiving the complaint. Where resolution is not possible within this timeframe, the complainant will be informed of the reasons for the delay and kept updated regarding progress and expected timeframes.

### 3 Responsibilities

| Role                    | Responsibility                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Chief Executive Officer | <ul style="list-style-type: none"> <li>Promote a culture that values complaints and their effective resolution.</li> <li>Ensure adequate resources are provided for the complaint handling system compliance and reporting.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Managers                | <ul style="list-style-type: none"> <li>Actively ensure employees are implementing the Complaint Handling procedure.</li> <li>Regularly review reports about complaint trends and issues arising from complaints.</li> <li>Ensure recommendations arising out of complaint data analysis are canvassed with Management and implemented where appropriate.</li> <li>Train and empower staff to resolve complaints promptly and in accordance with this procedure.</li> <li>Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.</li> <li>Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li> <li>Recognise and reward good complaint handling by staff.</li> </ul> |
| All staff               | <ul style="list-style-type: none"> <li>Day to day implementation of CIT Water Exchange's complaint handling policies and procedures.</li> <li>Treat all people with respect, including people who make complaints.</li> <li>Assist people who wish to make complaints access CIT Water Exchange's complaints process.</li> <li>Be alert to complaints and assist staff handling complaints resolve matters promptly.</li> <li>Provide feedback to management on issues arising from complaints.</li> <li>Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</li> </ul>                                                                                                                                                              |

### 4 Definitions

| Term      | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Complaint | <ul style="list-style-type: none"> <li>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.</li> <li>A complaint covered by this Procedure can be distinguished from: <ul style="list-style-type: none"> <li>staff grievances [see our Grievance Policy]</li> <li>code of conduct breaches [see our Code of Conduct]</li> <li>responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]</li> </ul> </li> </ul> |

|                             |                                                                                                                                                                                                                                                                                                                         |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                             | <ul style="list-style-type: none"> <li>- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of ‘feedback’]</li> </ul>                                                                                                                 |
| Complaint Management System | <ul style="list-style-type: none"> <li>• All policies, procedures, practices, staff, hardware and software used by CIT Water Exchange in the management of complaints.</li> </ul>                                                                                                                                       |
| Feedback                    | <ul style="list-style-type: none"> <li>• 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.</li> </ul> |

## 5 Guiding principles



### 5.1 Assessing a complaint

CIT Water Exchange is 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 multiple and accessible ways to make complaints,
- listened to and treated with respect by staff,
- advised of the specific process and expected timeframe to be followed for their case and kept informed at each step of the process,
- provided with reasons for our decision/s and any options for redress or review.

#### 5.1.1 No detriment to people making complaints

CIT Water Exchange 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.

#### 5.1.2 Anonymous complaints

CIT Water Exchange accepts anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

### 5.1.3 Accessibility

CIT Water Exchange will ensure that information about how and where complaints may be made to or about us is well publicised. CIT Water Exchange 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, CIT Water Exchange 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).

## 5.2 Responding to complaints

### 5.2.1 Early resolution

Where possible, complaints will be resolved at the first point of contact with CIT Water Exchange.

### 5.2.2 Responsiveness

CIT Water Exchange will promptly acknowledge receipt of complaints. CIT Water Exchange will assess and prioritise complaints in accordance with the urgency, risks and/or seriousness of the issues raised.

CIT Water Exchange is committed to managing people's expectations, and will inform them within two business days of receiving a complaint, 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
- the possible or likely outcome of their complaint.

CIT Water Exchange 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). CIT Water Exchange 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.

### 5.2.3 Objectivity and fairness

CIT Water Exchange will address each complaint with integrity and in an equitable, objective, and unbiased manner.

CIT Water Exchange will ensure that the person handling a complaint is different from any staff member or team 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.

#### 5.2.4 Good Faith

CIT Water Exchange will deal with all complaints in good faith. This includes acting honestly, fairly, reasonably and without improper purpose, and seeking to resolve complaints through open and constructive engagement with complainants. Staff involved in handling complaints must ensure that complainants are treated fairly throughout the process.

#### 5.2.5 Responding flexibly

CIT Water Exchange staff are empowered to resolve complaints promptly and with as little formality as possible. CIT Water Exchange 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.

#### 5.2.6 Confidentiality

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

### 5.3 Managing the parties to a complaint

#### 5.3.1 Complaints involving multiple agencies

Where a complaint involves multiple organisations, CIT Water Exchange 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.

#### 5.3.2 Complaints involving multiple parties

When similar complaints are made by related parties CIT Water Exchange will, by agreement, try to arrange to communicate with a single representative of the group.

#### 5.3.3 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.

#### 5.3.4 Managing unreasonable conduct of people making complaints

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

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

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, CIT Water Exchange will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same.

## 6 Complaint management system

When responding to complaints, staff should act in accordance with this Complaint Handling Procedure 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. For example, the Water Market Intermediaries Code.

The six key stages in our complaint management system are set out below.



### 6.1 Receipt of complaints

CIT Water Exchange will keep a record of all complaints and any supporting information.

CIT Water Exchange will also assign a unique identifier to the complaint file. The record of the complaint will document:

- the contact information of the person making a complaint,
- issues raised by the person making a complaint and the outcome/s they want,
- any other relevant information
- whether the complaint was received verbally or in writing and
- any additional support the person making a complaint requires.

Complaints may be received verbally, by telephone, email, letter, website form, social media message or any other reasonable means of communication.

Where a complaint is not received in writing, CIT Water Exchange will create a written record of the complaint. The record will accurately document the issues raised, the outcome sought by the complainant and any other relevant information provided.

## 6.2 Acknowledgement of complaints

CIT Water Exchange will acknowledge receipt of each complaint in writing within two (2) business days of receiving the complaint.

The acknowledgement will include:

- confirmation that the complaint has been received;
- the complaint reference number;
- a summary of the complaint;
- information about the complaint handling process;
- expected timeframes for handling the complaint; and
- contact details for the person responsible for managing the complaint.

Where a complaint was not received in writing, a copy of the written complaint record will be provided to the complainant with the acknowledgement.

### 6.2.1 Initial assessment

After acknowledging receipt of the complaint, CIT Water Exchange will confirm whether the issue/s raised in the complaint are within our control.

CIT Water Exchange 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, CIT Water Exchange 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.

### 6.2.2 Management and investigation of complaints

Following assessment of the complaint, CIT Water Exchange will determine the most appropriate method for resolving the matter and will make a genuine attempt to resolve the complaint within 20 business days of receiving it.

Within ten (10) business days of receiving the complaint, CIT Water Exchange will provide the complainant with a written response specifying the actions proposed to resolve the complaint.

All complaints will be assessed against policy, legislation, and service level. 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.

CIT Water Exchange will keep the person making the complaint up to date on our progress, particularly if there are any delays. CIT Water Exchange will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and consider any statutory requirements.

### 6.3 Providing reasons for decision

Within five (5) business days of completing the complaint process, CIT Water Exchange will provide written notice of the outcome to the complainant and advise them of:

- the outcome of the complaint and any action taken,
- the reason/s for our decision
- the remedy or resolution/s that Cit Water Exchange 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.

If, during investigation, CIT Water Exchange make any adverse findings about a particular individual, CIT Water Exchange will consider any applicable privacy obligations and any applicable exemptions in or made pursuant to that Act, before sharing our findings with the person making the complaint.

### 6.4 Closing the complaint

A complaint will not be considered closed until:

- the complainant has been notified in writing of the outcome;
- any agreed actions have been implemented or scheduled for implementation; and
- all relevant records have been completed and retained in accordance with CIT Water Exchange's record keeping requirements.

### 6.5 Options for redress

#### 6.5.1 Internal Review

If a complainant is dissatisfied with the outcome of a complaint, they may request an internal review.

Internal review requests will be considered by a person who was not involved in the original complaint decision and who has an appropriate level of authority.

Internal reviews will be conducted as follows:

- Level 1 – Manager responsible for the area of complaint
- Level 2 – Chief Executive Officer
- Level 3 – Board Chairperson

#### 6.5.2 External Escalation

If a complainant remains dissatisfied after the internal review process has been completed, CIT Water Exchange will provide information on available external avenues.

Depending on the nature of the complaint, this may include referral to:

- the Australian Competition and Consumer Commission (ACCC);
- an independent legal adviser;
- a court or tribunal with relevant jurisdiction; or
- any other appropriate external dispute resolution or regulatory body.

## 7 Water Markets Intermediaries Code Compliance Section

### 7.1 Compliance with the Water Markets Intermediaries Code

CIT Water Exchange maintains this documented complaint handling procedure to satisfy its obligations under the Water Markets Intermediaries Code.

In accordance with those obligations, CIT Water Exchange will:

- deal with complaints in good faith;
- maintain a documented complaints process;
- create written records of complaints received verbally;
- acknowledge complaints in writing within two (2) business days;
- provide complainants with information about the complaints process;
- provide a written response outlining proposed actions within ten (10) business days;
- make a genuine attempt to resolve complaints within twenty (20) business days; and
- provide written notice of the outcome within five (5) business days of completing the complaint process.

## 8 Reporting and improvement

### 8.1 Analysis and evaluation of complaints

CIT Water Exchange will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis. Regular reports will be run on:

- the number of complaints received,
- the outcome of complaints, including matters resolved at the frontline,
- issues arising from complaints,
- systemic issues identified, and
- the number of requests (disputes) received for internal and/or external review of our complaint handling.

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

## 8.2 Monitoring of the complaint management system

CIT Water Exchange will periodically monitor our complaint management system to

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

## 8.3 Continuous improvement

CIT Water Exchange 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
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.