

Complaints Management - Australian Development Projects



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Acronyms and Abbreviations

Name	Description
AEIC	Australian Energy Infrastructure Commissioner
CMS	Complaint Management Procedure
CRM	Customer Relationship Management software
GW	Gigawatt
IAP2	International Association for Public Participation
LGA	Local Government Authority
PPA	Power Purchase Agreement
RES	RES Australia Pty Ltd

Definitions

Name	Description
Landholders	Landholders are defined as owners of land that RES has an interest in, or is pursuing an interest in, for the purposes of development, access, transmission etc.
Neighbours	For the purpose of RES Projects, neighbours are considered to be: <ul style="list-style-type: none"> Landholders with property immediately adjacent to the project site Users of local roads and infrastructure near/adjacent to the project site Any other stakeholders living, working, or who are regularly within 5km of the project.
Community	For RES projects, the community is defined as any person, group, or business who lives/is based within, or has a connection to the geographic area surrounding the proposed project site, within an approximate radius of 20 km or as defined by the social area of influence for the project.
Special Interest Group	A group of people who work together to achieve something that they are particularly interested in. This could include conservation and environment groups; lobby groups, or local activist group wanting to have input into or influence a decision.
Complaint (general)	Any expression of dissatisfaction made to or about RES, any Australian RES site, staff working on RES projects or the complaints handling process itself where a response or resolution is explicitly or implicitly expected or legally required.
Complainant	Person, organisation or their representative making a complaint
Complaint (development phase)	An expression of dissatisfaction or report of present impact made directly to RES or referred from another agency e.g. AEIC or LGA, about the immediate and short term material impacts (prior to construction commencement) of the development process that requires a response. This could include staff or contractor conduct; immediate or short-term material impacts on a person, their livelihood or possessions, or the environment; or development and engagement procedures. A development phase complaint may also result from protracted discussion about potential project impacts on neighbours, that have not moved to resolution.
Development Phase	Project development activities including options analysis, feasibility, design, planning & approval leading up to the commencement of construction. A specific Complaint Investigation and Response Plan will be developed for the Construction and Operation phases of RES projects.
Project Feedback	A general (rather than specific) expression of concern about potential impacts of a project's construction or operation that need to be considered during development. General feedback about engagement and planning processes. Feedback and submissions during the planning application notification process. Feedback about project improvements; business and community opportunities or benefit sharing.
Enquiry	External communications that express an interest in the project, request information, seek assistance (e.g., sponsorship) or provide information relevant to the project.
Unreasonable behaviour	Conduct that involves behaviour which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for RES, its staff, other members of the public or complainants.

1 About RES

RES entered the Australian market in 2004 and now employs over 150 people and has offices in Sydney, Melbourne, Brisbane and multiple regional locations. RES is engaged in all technologies: wind, solar and storage and offers development, construction, and asset management services across Australia.

RES manages a portfolio of 2.05GW of renewable assets in Australia. This includes some of the largest wind farms in the southern hemisphere: Murra Warra Wind Farm and Dulacca Wind Farm, as well as Emerald Solar Park; one of the first solar farms commissioned in Australia.

With an industry-wide reputation for identifying innovative solutions to problems that reduce risk, cost and allow projects to progress, RES' exceptional work was recently acknowledged with the Clean Energy Council's Innovation Award 2022 and Diversity & Inclusion Award 2023, as well as the Asset Management Award 2022 at the Wind Investment Awards.

RES is the world's largest independent renewable energy company and is active in onshore and offshore wind, solar, energy storage, green hydrogen, transmission and distribution. As an industry innovator for over 40 years, RES has delivered more than 23GW of renewable energy projects across the globe and supports an operational asset portfolio exceeding 12GW worldwide for a large client base. Understanding the unique needs of corporate clients, RES has secured over 1.5GW of corporate power purchase agreements (PPAs) enabling access to energy at the lowest cost. RES employs over 2,500 passionate people and is active in 14 countries.

2 Policy Statement

RES is committed to providing excellent community and stakeholder engagement including accessible and transparent complaint management processes. We are committed to resolving complaints and have a culture that recognises an individual's rights to complain. This is vital to achieve and maintain social licence to operate for our projects. Community and stakeholder feedback is encouraged as complaints provide an opportunity to learn and improve the delivery of high-quality projects.

Complaints processes will be:

- Managed in a timely, people focused and proactive manner.
- Accessible and culturally responsible.

Information about the complaint management process will:

- Be readily available to the public.
- Clearly outline a number of different ways to make a complaint.
- Clearly outline what to expect once you have made a complaint.

3 Purpose

The purpose of this Complaint Management System is to ensure that RES:

- Promptly acknowledges complaints and keeps the complainant informed of any progress, findings and outcomes.
- Deals with the complaints respectfully and in a co-operative manner.
- Keeps accurate records of the complaint and subsequent investigation process in order to respond to regulatory requirements.
- Maintains positive relationships and encourages constructive, two-way communication with the community and external parties.
- Learns from complaints in order to deliver quality improvements.

4 Scope and Application

This procedure applies to all RES projects in the development phase, including options analysis, feasibility, design, planning & approval, up to the beginning of construction. Complaint management during construction and operation of a renewable energy facility is governed by a specifically developed CMP required as a condition of the development approval.

All RES employees communicating with members of the public and conducting business on behalf of RES development projects are bound by this complaint management policy and procedures.

The procedures will be applied to all incoming communication from project landholders, neighbours, the community, special interest groups and other stakeholders to determine whether the communication is an enquiry, general project feedback or a complaint (see definitions). Enquiries and general feedback on projects will be handled using standard communication and community engagement protocols. Interactions deemed to be potential complaints will be handled using the procedure outlined in Sections 8 to 10.

5 Complaint Management Standards and Frameworks

This procedure has also been informed by:

- AS/NZS 10002:2014 Guidelines for complaint management in organisations
- Best Practice Charter for Renewable Energy Projects (Clean Energy Council)
- Better Practice Guide to Complaint Handling (Commonwealth Ombudsman 2021)
- Community Engagement Guidelines for the Australian Wind Industry (Clean Energy Council, June 2018)

- Australian Energy Infrastructure Commissioner Complaint Handling Policy 2023.

6 Guiding Principles

RES' commitment to best practice stakeholder engagement aligns with our company values of passion, accountability, collaboration and excellence and our vision to be a Power for Good - creating a future where everyone has access to affordable zero carbon energy.

As a founding signatory of the Clean Energy Council's (CEC) Best Practice Charter for Renewable Energy Development 2018, we believe in effective, clear and transparent community engagement. Our engagement principles follow the IAP2 spectrum and reflect our experience implementing various engagement guidelines related to significant projects across various States.

RES is committed to the following:



Figure 1: Engagement principles

RES has a dedicated and experienced team which can draw on its learnings from other projects in Australia to establish respectful relationships with local communities. In this way, RES aims to foster social licence to plan, construct and operate projects, striving for best practice, and early engagement with communities to develop an understanding of the community and the project's stakeholders. We understand that no two communities are the same and our investment in early engagement allows us to tailor our communications approach to the community we are working in. In turn, this supports the ability for communities and local stakeholders to participate in and inform project planning and development. RES acknowledges that a robust community and stakeholder engagement process can further inform the assessment process and project technical studies to bring about positive project and community outcomes.

RES's engagement approach is based on the following commitments:

- Keeping the community informed throughout the pre-planning development phase of the Project. Providing clear and timely information on how and when they can participate in decision making and the level of influence their feedback has on the project.
- Allowing the views of local stakeholders to inform project planning and design (as far as practicable) and listening and responding to any concerns raised.
- Providing access to up-to-date information on project progress and demonstrate (where applicable) how the design of the Project has been adapted to take account of community participation and the findings of feasibility studies.
- Use learnings from all projects to inform future engagement activities as part of our commitment to continuous improvement.

Other key documents that will guide RES' approach include:

- CEC's Best Practice Charter (CEC, August 2021)
- CEC Community Engagement Guidelines for the Australian Wind Industry (CEC, June 2018)
- RES's Power for Good Report (RES, May 2023)
- Relevant State based guidelines

In addition to these engagement principles RES will manage complaints relating to our projects ensuring we are customer focused; timely and fair; transparent and clear in our communications; accountable; and use complaints to improve our future approaches. Our commitments are outlined in Table 1.

Table 1: Complaint Management Commitments

Principle	Commitment
Customer focused and accessible	A clear and accessible complaint management system where complaints can be made in a number of ways. Complainant will be treated with respect and responses will address all issues raised with honesty and transparency. People with a range of needs can easily complain and staff actively assist them to navigate the complaints process.

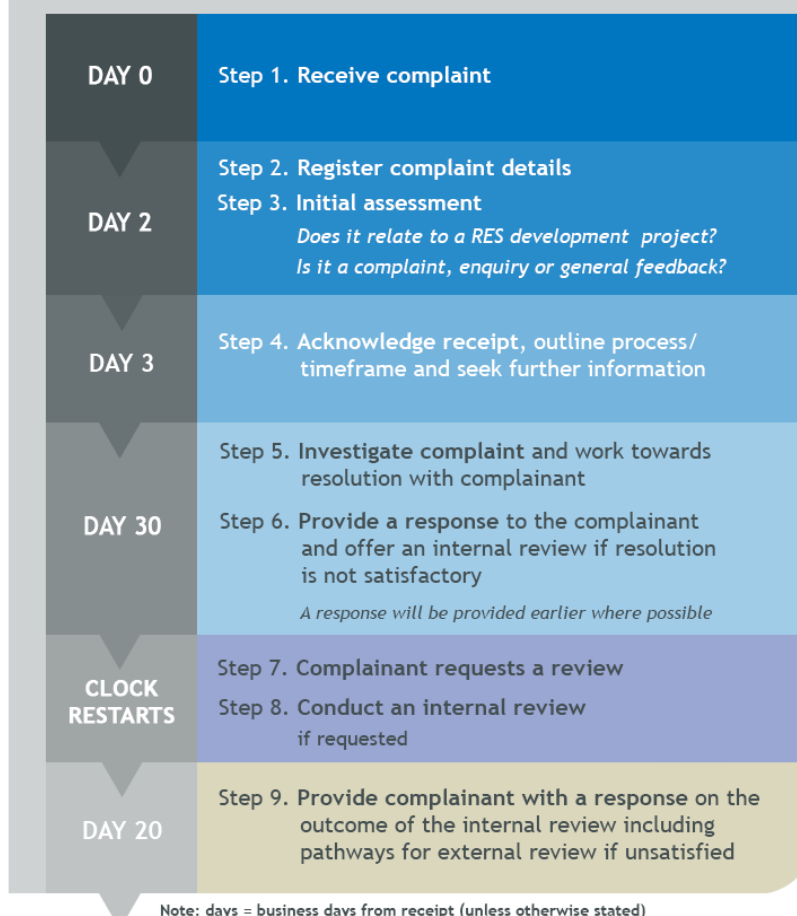
Timely and fair	Complainants will receive timely acknowledgements and responses. Complaint handling processes will be clear, dealings will be confidential and provide detailed information in plain English where possible.
Transparency and clear communication	We will make it clear how to complain, where to complain and how the complaint will be handled. The steps taken to respond to a complaint are recorded and will stand up to scrutiny. Expectations and standards for all parties involved will be communicated clearly.
Accountable	Our complaint management processes including roles, responsibilities and time frames will be clear, publicly available and adhered to.
Improving service	We will regularly analyse complaints and review the complaints management system. This will inform improvements in complaint management processes, broader community engagement and project development approaches.

7 Complaint Handling Procedures

RES's procedure for complaint handling consists of a three-tiered system: initial complaint handling; internal review and external review. The steps in the procedure are outlined in Figure 2.

Figure 2: RES Complaints Handling Procedure

Complaints Procedure



Note: days = business days from receipt (unless otherwise stated)

7.1 Initial complaint handling

It is expected that most complaints received will be handled and resolved at this stage within 30 business days. Where the complaint is not resolved initially, complainants will be offered an internal review. Complainants will be advised that they have 20 business days from receipt of the RES's complaint response to seek an internal review.

7.2 Internal review

An internal review offers the complainant a merits-based review of the decision made based on the information and facts available at the time. This includes whether the actions and decisions made were lawful, reasonable, fair and not discriminatory. An internal review is also an opportunity to review and improve the complaints handling process. RES will aim to provide an internal review response within 20 business days of receipt and proactively advise the complainant if this timeframe will not be met. As a part of the internal review response complaints will be advised of their external review pathways.

7.3 External review

An external review is a process available to complainants where an oversight agency, such as the Australian Energy Infrastructure Commissioner, investigates RES's handling of a complaint. More information about external complaints handling processes can be found here: [Making a complaint | aeic](#)

8 Initial Complaint Handling

8.1 Receipt

RES provides multiple avenues for lodging complaints including:

- Online complaint form
- Email address
- Phone number
- In person meeting
- Mailing address

Information about how to lodge a complaint and the complaint management system will be readily available on each project website.

RES will accept anonymous complaints but cannot ensure the complaint can be fully investigated if contact information is not provided.

Any RES employee or contractor who receives a complaint relating to a development project should refer it immediately to the RES Community Engagement Manager.

Complaints will be registered in the project specific complaint management register within 2 business days of receipt.

The following information must be recorded in the complaints register:

- A unique identifier for the complaint;
- Name and address of the complainant and, where possible, any applicable property reference number;
- Means by which the complaint was made;
- Person who recorded the complaint;
- Location, time and date of incident;
- A description of the complainant's concerns (including selecting the category of complaints this relates to within the relevant database); and
- What outcome the complainant is seeking.

If a complaint is lodged with a third party, for example a local Council, AEIC, State Department or state owned organisation such as Clean Co in QLD, details of that complaint can be forwarded to RES.

RES will consult with the third party and with the complainant to determine if that complaint will be investigated and assessed in accordance with this complaints procedure or if the third party will retain responsibility for investigation of an escalated complaint.

8.1.1 Assistance of Complainants

RES will provide complainants with reasonable assistance to lodge a complaint. This will include where needed:

- Access to interpretation or translation services
- Access to National Relay Services and teletypewriter services
- Easy to read complaint policies and forms
- A contact number to discuss complaints processes prior to lodgement
- The option of their complaint to be record in writing for them.

8.1.2 Vulnerability

RES recognises that vulnerabilities such as such as age, disability or impairment, mental health issues, low income, sudden change in circumstances, rural/remote factors, homelessness, issues accessing digital services can impact on how people engage with the complaints handling process. RES will encourage and support people experiencing vulnerabilities to make complaints and throughout the complaint handling process.

8.2 Acknowledgement of Complaint

An acknowledgment of complaint will be sent within three (3) business days of the complaint being received. The acknowledgement will be sent to the complainant in the same format as it was received or

in the format requested by the complainant. If a complaint was received and responded to over the phone an interaction will be added to the project CRM (BOREALIS).

The acknowledgement communication will include:

- Acknowledgement of receipt of the complaint
- The proposed timeframe for response
- Information about the complaint management process
- RES case manager contact information.

8.3 Assessment of Complaint

The initial assessment of the complaint will consider:

- Whether the matters raised in the complaint relate to a RES project, staff member or contractor i.e., it is in scope.
- Whether the complaint falls within the definition of a complaint (see Definitions) or is deemed an enquiry or feedback about potential future impacts of the proposed project
- Whether the complaint requires immediate referral to Emergency Services, TSPs or other third parties.

If the complaint is not within scope or is designated as an enquiry or feedback the complainant will be provided with written advice about the decision. The enquiry will be addressed and the feedback recorded in RES's CRM (DARZIN/ BOREALIS).

8.4 Responding to Complaint

A final response to a complaint will be provided within 30 business days after the complaint was received, however earlier resolution of the complaint will be prioritised where possible. RES's case manager will work with the complainant during this time to gather information and work towards a resolution.

If it is determined that a timeframe for a response is not likely to be met, RES will proactively advise the complainant of this at the earliest opportunity and advise the new expected timeframe and case manager contact details should they require further information.

A complaint response should offer an internal review process in case the complainant is not satisfied with the response. Such as:

If you are not satisfied with our response, you may ask for an internal review. You should make this request in writing within 20 business days of receipt of this correspondence. Your request should outline why you are asking for an internal review. You may lodge your request for internal review at (contact details to be included). Please contact (officer name, position, phone number and email address) if you require any further information.

8.5 Reporting

Reporting on complaints can provide RES with useful information to assist with performance monitoring and business improvement. In addition to other agreed reporting requirements with third parties, RES will prepare an annual internal report on the number of complaints and include the following information:

- Number of complaints received per project in the year
- A breakdown of the nature of complaints per project.

8.6 Learning and Continual Improvement

Complaints provide valuable information that can help RES learn and improve our business and how we engage with the communities that host our projects. In addition to reporting and analysis of complaints, RES will seek feedback from complainants about the complaint process via a series of standard questions offered to the complainant.

At a minimum the following information should be recorded for each complaint receipt:

- contact information (where the complaint is anonymous, then 'Anonymous' can be recorded)
- issues raised
- outcome sought
- any other information required to respond to the complaint
- any support needed by the complainant.

Anonymous complaints may not have contact information or receive a response, but should be recorded as a complaint and captured as a record tagged as *Anonymous #* in the complaints register.

Any documents relating to a complaint, such as file notes, emails, supporting documents etc. should be recorded in the CRM (DARZIN/BOREALIS) during each stage of the complaint process.

9 Internal Review

An internal review is a merits review that involves a consideration of whether, based on the information/facts available at the time, a decision made relating to a complaint was correct. The review will not re-investigate the complaint, but will provide an impartial review of a decision made about a complaint undertaken by an appropriate officer (more senior than the original decision maker), who is independent from the original complaint handling process.

At a minimum the following requirements should be clearly communicated to a complainant who seeks a review:

- the timeframe for lodgement of a complainant's internal review request with the

- agency
- how the complainant's submission should be made, e.g. in writing, taking into account the complainant's known support needs
- that the complainant needs to outline why they are asking for an internal review
- what the complainant's responsibilities are as part of an internal review
- what outcomes are being sought by the complainant
- what supports are available to assist complainants to apply for an internal review.

When RES provides a response to an internal review request we will also advise complainants about their external review rights. An example paragraph follows:

If you are not satisfied with the outcome of your internal review, you may forward your complaint to the Australian Energy Infrastructure Commissioner at aeic@aeic.gov.au or PO Box 24434, Melbourne VIC 3001. The AEIC can be contacted by phone on 1800 656 395 or via the website

10 External Review

An external review of a complaint and subsequent response can be conducted by an independent agency such as the:

Australian Energy Infrastructure Commissioner

Email: aeic@aeic.gov.au

Post: PO Box 24434, Melbourne VIC 3001

Telephone 1800 656 395

Web: <https://www.aeic.gov.au/>

Or any relevant State based Ombudsman.

11 Record Keeping

RES will keep detailed and accurate records about complaints, beginning at initial receipt and including all interactions with the complainant during the complaint management process. These will be recorded RES's CRM against the relevant project as soon as possible after the interaction or response.

12 Privacy

Complaints information will be handled according to privacy laws and other relevant legislation. We will provide clear information about how we handle personal information to each complainant. Complaint data will be de-identified if reported more widely.

13 Roles and Responsibilities

Social Performance Manager

The Social Performance Manager is responsible for:

- Implementing and maintaining the complaint management system, including complaints register
- Establishing a process of performance monitoring, evaluation and reporting
- Reporting to senior management on the operation of the complaint management system and systemic issues or trends identified through the receipt of complaints, with recommendations for improvement where appropriate
- Initiate and track internal review procedures for unresolved complaints/disputes
- Arranging appropriate training for staff responsible for handling complaints
- Accurately recording the complaint and maintaining records of the investigation process in the complaints register
- Managing the investigation process
- Meeting with complainants together with other relevant Managers
- Liaising with any relevant regulatory bodies (i.e. Government departments, Councils etc)

Development Project Manager (DPM)

The DPM is responsible for:

- Liaising with the Community Engagement Manager and following up any required actions or controls that may result following the complaint investigation
- Providing a first point of contact for complainants
- Notifying the Community Engagement Manager or senior RES Manager of any complaints received
- Meeting with complainants together with the Community Engagement Manager and other relevant Managers
- Accurately recording complainant interactions in DARZIN/BOREALIS.

Community Engagement Manager

The nominated Community Engagement Manager is responsible for:

- Monitoring communications (email, web forms etc) for complaints
- Providing first point of contact for complainants
- Notifying the DPM and CE Manager when a complaint is received
- Initiating the complaint management procedure when a complaint is received
- Accurately recording the complaint and maintaining records of the investigation process in the complaints register
- Assisting the DPM and CE Manager to investigate and respond to complaints
- Meeting with complainants together with other relevant Managers, when required.

Head of Sustainability, Communications and Engagement

- Undertake internal review and engagement of other departments as required (Development, Legal, Land, Environment, Health & Safety)
- Liaise with CE Manager to provide outcome of internal review
- Report internally to RES Board and externally as required about escalated complaints.

14 Training

RES will ensure that all staff involved in complaint handling have been appropriately trained about complaint management procedures and relevant roles and responsibilities. This will include training about cultural awareness and receiving complaints from people experiencing vulnerabilities. General complaint awareness training will be provided to all new staff working in public facing roles on RES projects as part of their induction.

15 Managing Unreasonable Complaints

At times, staff may have to deal with the unreasonable conduct by a complainant. Unreasonable conduct by a complainant is any behaviour which, because of its nature or frequency, raises substantial health, safety or resource issues. This could include unreasonable persistence; unreasonable demands; unreasonable lack of cooperation; unreasonable arguments; and unreasonable behaviour.

RES is responsible for ensuring the health, safety and wellbeing of all employees. Staff should alert their Manager of any unreasonable conduct by a complainant. The Manager will work with staff to develop a clear and proactive approach for managing unreasonable behaviour, which ensures staff wellbeing while enabling the complaint to be productively resolved.

Managing complainant expectations from the beginning of the complaint process, and clear and regular communication with the complainant about the status of their matter is essential when dealing with all complainants and can help prevent escalation of unreasonable conduct.