Sydney Metro
Construction complaints management system
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<th>Status</th>
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<th>Name/Position/Company</th>
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<td>Update to report name – SCL-05 replaces SCR-05 Addition of review requirements table Table 1 - Update to TfNSW group name; update to NWRL role ‘Manage call centre’; update to contractor team removed ‘reasonable’ – 2 instances Table 2 – New table with MCoA 2 – New section ‘Receiving complaints’ Table 4 - Update to position tiles 4.3 – Update to process – advise DPD prior to updating database 5.1.1 – Role of the mediator expanded 5.2 - Update to escalation process incorporating more detail on the role of the mediator 6.2 - Update to actions required 7.1 - Table 3 - removed and replaced with text 7.2 – Additions to reporting requirements Appendix A - Deleted (incorporated into 5.1.1 and 5.2)</td>
<td>Rebecca Raap</td>
<td>Author</td>
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<td>2.0</td>
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<td>References to SCR changed to SCL ‘Stakeholder and Community Liaison 1.1 – Correction to review time, changed to 6 months Table 1 – Updated for consistency with SCL-02 and updates to reflect TSC, SVC and OTS contractual requirements</td>
<td>Rebecca Raap</td>
<td>Author</td>
<td></td>
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1.3 - MCoA not relevant to SCL-05 deleted  
6.2 – Additional ‘Action’ added for completeness  
Appendix A - Updated complaint form

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<td>Rebecca Raap</td>
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<td>New section 7 to cover satisfaction surveys</td>
<td>Rebecca Raap</td>
<td>Author</td>
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<tr>
<td>5.1</td>
<td>30/8/16</td>
<td>Draft</td>
<td>Updated to reflect new Sydney Metro organisational structure; new program communications teams; department/team and role names; update to contractor responsibilities based on new contracts.</td>
<td>Rebecca Raap</td>
<td>Author</td>
</tr>
<tr>
<td>6.0</td>
<td>5/9/16</td>
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<td>Approved for distribution to contractors and Department of Planning and Environment</td>
<td>Danielle Smalley</td>
<td>Approver</td>
</tr>
<tr>
<td>6.1</td>
<td>20/2/17</td>
<td>Draft</td>
<td>Updated to reflect new terminology: Independent Mediator is now known as Community Complaints Commissioner 6.2 updates to data entry process; deleted screen shots from the database</td>
<td>Rebecca Raap</td>
<td>Author</td>
</tr>
<tr>
<td>6.2</td>
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<td>Updated to reflect ER comments and compliance with Planning Approval for C&amp;SW Table 1 – update to include role of ER, AA and CCC 5.1.1 – Addition of ER and AA; and limitations of the CCC</td>
<td>Rebecca Raap</td>
<td>Author</td>
</tr>
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</tr>
</tbody>
</table>
| 5.2 – Addition of ER/AA to resolution process  
7.1 – Addition of AA to daily complaint report list  
App A – Addition of endorsement letter |   |   |
| 6.2 | 15/3/17 | Final  
Approved for distribution to contractors and Department of Planning and Environment | Anne Purcell | Approver |
Review Requirements

This procedure should be reviewed and reissued annually, or as required.

<table>
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<tr>
<th>Review due</th>
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<th>Additional Review Date</th>
</tr>
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<tbody>
<tr>
<td>30 July 2013</td>
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<td>30 January 2014</td>
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<td>30 July 2014</td>
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<td>30 July 2017</td>
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<tr>
<td>30 July 2020</td>
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</table>
# Contents

1. **Construction complaints management system**
   - 1.1 Document purpose  
   - 1.2 Responsibilities  
   - 1.3 Conditions of Approval  
   - 1.4 Australian Standard for Complaints Handling  

2. **Receiving complaints**  
   - 6

3. **Classification of complaints**  
   - 3.1 Unavoidable complaints  
   - 3.2 Avoidable complaints  
   - 3.3 Determining a unavoidable complaint  
   - 3.4 Resolving classification  

4. **Responding to complaints**  
   - 4.1 Receiving a complaint  
   - 4.2 Referring complaints  
   - 4.3 Responding to complaints (not related to construction)  
   - 4.4 Responding to construction complaints  

5. **Complaint escalation procedure**  
   - 5.1 When to escalate a complaint  
   - 5.2 How to escalate a complaint  

6. **Complaints Register**  
   - 6.1 Complaint identification number  
   - 6.2 Consultation Manager  

7. **Reporting on complaints**  
   - 7.1 Daily reporting to Transport for NSW  
   - 7.2 Daily complaint reporting to the EPA  
   - 7.3 Monthly reporting to Transport for NSW  

Appendix A  
**Environmental Representative endorsement letter**
1 Construction complaints management system

1.1 Document purpose
This document forms part of the Sydney Metro Communication and Engagement Management System. Its purpose is to outline the procedure for managing complaints across Sydney Metro. This includes:

- Receiving complaints
- Classifying complaints
- Responding to complaints
- Escalation
- Mediation
- Recording complaints
- Reporting.

This construction complaints management system will be reviewed annually and reissued or as required.

1.2 Responsibilities
Complaints handling is the responsibility of all team members who come into contact with the community and stakeholders.

The Principal Manager, Project Communications is the designated complaints handling management representative for their respective project.

Table 1 Responsibilities for complaints

Source: Sydney Metro Overarching Community Communication Strategy – March 2017

<table>
<thead>
<tr>
<th>Role</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>TfNSW Public Affairs and Engagement</td>
<td>• Manage TfNSW call centre.</td>
</tr>
<tr>
<td></td>
<td>• Forward any complaints regarding Sydney Metro to the relevant Sydney Metro</td>
</tr>
<tr>
<td></td>
<td>Project Communications team or relevant contractor.</td>
</tr>
<tr>
<td>Sydney Metro Communication</td>
<td>• Manage Sydney Metro 24-hour call centre.</td>
</tr>
<tr>
<td>and Engagement team</td>
<td>• Develop procedures for managing and resolving stakeholder and community</td>
</tr>
<tr>
<td></td>
<td>complaints directed to Sydney Metro (this document).</td>
</tr>
<tr>
<td>Environmental Representative</td>
<td>• City &amp; Southwest</td>
</tr>
<tr>
<td></td>
<td>– Assist in resolving complaints in accordance with this Strategy.</td>
</tr>
<tr>
<td></td>
<td>– Notify the Secretary if a complaint cannot be resolved.</td>
</tr>
<tr>
<td>Acoustic Advisor</td>
<td>• City &amp; Southwest</td>
</tr>
<tr>
<td></td>
<td>– Assist in resolving complaints in accordance with this</td>
</tr>
<tr>
<td>Role</td>
<td>Responsibility</td>
</tr>
<tr>
<td>---------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Strategy.</td>
<td>– Notify the Secretary if a complaint cannot be resolved.</td>
</tr>
<tr>
<td>Community Complaints Commissioner (known as the Independent Mediator on Sydney Metro Northwest)</td>
<td>• Follow-up on any complaint where a member of the public is not satisfied with the response.</td>
</tr>
<tr>
<td>Sydney Metro Project Communications team</td>
<td>• Implement the Construction Complaints Management System (this document).</td>
</tr>
<tr>
<td></td>
<td>• Forward relevant complaints to contractors immediately.</td>
</tr>
<tr>
<td></td>
<td>• Investigate and determine the source of a complaint immediately, including an initial call to the complainant (when received by phone or where a telephone number was provided or available on Consultation Manager).</td>
</tr>
<tr>
<td></td>
<td>• Provide an initial response to all complaints within two hours (where a phone number is provided or available on Consultation Manager) from the time of the complaint unless the enquirer agrees otherwise.</td>
</tr>
<tr>
<td></td>
<td>• Provide a written response to emails within 24 hours (or verbally within two hours if a phone number is provided or available on Consultation Manager).</td>
</tr>
<tr>
<td></td>
<td>• Provide a written response to letters/faxes within 24 hours (or verbally within two hours if a phone number is provided or available on Consultation Manager).</td>
</tr>
<tr>
<td></td>
<td>• Keep the complainant informed of the process until the complaint is resolved.</td>
</tr>
<tr>
<td></td>
<td>• Close out complaints within agreed timeframe (with complainant).</td>
</tr>
<tr>
<td></td>
<td>• Escalate complaints in accordance with Construction Complaints Management System (this document).</td>
</tr>
<tr>
<td></td>
<td>• Record all complaints on Consultation Manager in accordance with Consultation Manager data entry procedure within 24 hours. Details should include how it was managed and closed out.</td>
</tr>
<tr>
<td>Contractor delivery communication teams</td>
<td>• Answer all phone calls transferred by the call centre from the community information line (calls to be answered by a team member 24/7, not an answering machine while construction activities are occurring).</td>
</tr>
<tr>
<td></td>
<td>• Develop and implement procedures for managing and resolving stakeholder and community complaints directed to the contractor in accordance with the Construction Complaints Management System (this document). and the relevant projects’ Conditions of Approval.</td>
</tr>
<tr>
<td></td>
<td>• Refer complaints not associated with contractor activities to the Sydney Metro Project Communications team immediately.</td>
</tr>
<tr>
<td></td>
<td>• Investigate and determine the source of a complaint</td>
</tr>
<tr>
<td>Role</td>
<td>Responsibility</td>
</tr>
<tr>
<td>------</td>
<td>----------------</td>
</tr>
<tr>
<td></td>
<td>immediately, including an initial call to the complainant (when received by phone or where a telephone number was provided or available on Consultation Manager).</td>
</tr>
<tr>
<td></td>
<td>• Provide an initial verbal response to all complaints within two hours (where a phone number is provided or available on Consultation Manager) from the time of the complaint unless the enquirer agrees otherwise.</td>
</tr>
<tr>
<td></td>
<td>• Provide a written response to emails within 24 hours (or verbally within two hours if a phone number is provided or available on Consultation Manager).</td>
</tr>
<tr>
<td></td>
<td>• Provide a written response to letters/faxes within 24 hours (or verbally within two hours if a phone number is provided or available on Consultation Manager).</td>
</tr>
<tr>
<td></td>
<td>• Keep the complainant informed of the process until the complaint is resolved.</td>
</tr>
<tr>
<td></td>
<td>• Provide feedback to requests for information from the Sydney Metro Project Communications team or the Community Complaints Commissioner within two hours.</td>
</tr>
<tr>
<td></td>
<td>• Comply with all directions from the Sydney Metro Project Communications team or the Community Complaints Commissioner in relation to the resolution of an escalated complaint.</td>
</tr>
<tr>
<td></td>
<td>• Take all actions and implement all measures to prevent the reoccurrence of the complaint.</td>
</tr>
<tr>
<td></td>
<td>• Close out complaints within agreed timeframe (with complainant).</td>
</tr>
<tr>
<td></td>
<td>• Escalate complaints in accordance with the Construction Complaints Management System (this document).</td>
</tr>
<tr>
<td></td>
<td>• Report to the Sydney Metro Project Communications team and the Environmental Representative on a daily basis. Record all complaints on Consultation Manager in accordance with Consultation Manager data entry procedure within 24 hours. Details should include how it was managed and closed out.</td>
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</tbody>
</table>

1.3 Conditions of Approval

Each Project’s approval has requirements around complaints handling including the creation of a Construction Complaints Management System. This document fulfils this requirement.

1.4 Australian Standard for Complaints Handling


The standard requires the following guiding principles:
1.4.1 Visibility
‘Information about how and where to complain should be well publicised to stakeholders’.

All Sydney Metro public materials will direct stakeholders wishing to make a complaint to use our:

- Community information line
- Community email address
- Community information centre and mobile displays
- Project postal address.

1.4.2 Accessibility
‘A complaints-handling process should be easily accessible to all complainants’.

All construction complaints management systems will be available on the Sydney Metro website. Information and assistance in making complaints will be made available if required. Complaints can be made by phone, email, post, fax or in person to a member of any member of the project or contractor teams.

1.4.3 Responsiveness
‘Receipt of each complaint should be acknowledged to the complaint immediately. The complainants should be treated courteously and kept informed of the progress of their complaint through the complaint-handling process’.

Our responsibilities for complaint handling include:

- Investigate and determine the source of a complaint immediately, including an immediate call to the complainant (when received by phone).
- Provide an initial response to all complaints within two hours (where a phone number is provided or available on Consultation Manager) from the time of the complaint unless the enquirer agrees otherwise.
- Keep the complainant informed of the process until the complaint is resolved.

1.4.4 Objectivity
‘Each complainant should be addressed in an equitable, objective and unbiased manner through the complaint-handling process’.

Our contractors develop and manage their own construction complaints management systems. Complaints unable to be resolved within the agreed timeframe are referred to the Principal Manager, Project Communications, who may assist with resolving the complaint. If the complaint is still unable to be resolved in the agreed timeframe, the complaint will be referred to an Community Complaints Commissioner for equitable, objective and unbiased advice, to assist with a resolution in a timely manner.

1.4.5 Charges
‘Access to the complaint-handling process should be free of charge to the complainant’.

All Construction Complaints Management Systems will be available free of charge on the Sydney Metro website.
1.4.6 Confidentiality

‘Personally identifiable information concerning the complainant should be available where needed, but only for the purposes of addressing the complaint within the organisation and should be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure’.

A stakeholder’s contact information along with their complaint record will be recorded for the purposes of resolving their complaint. Should they wish to remain anonymous, the complaint will be registered under an ‘Anonymous’ stakeholder record for recording keeping and reporting purposes.

1.4.7 Customer focussed approach

‘The organisation should adopt a customer-focused approach, should be open to feedback including complaints, and should show commitment to resolving complaints by its actions’.

Stakeholders will be informed of all works likely to cause an impact and of mitigation measures to reduce those impacts. Should this be unsatisfactory, complaints can be made by phone, email, post, fax or in person to a member of the project team.

Our contractors develop and manage their own construction complaints management systems. Complaints unable to be resolved within the agreed timeframe are referred the Principal Manager, Project Communications, who may assist with resolving the complaint. If the complaint is still unable to be resolved in the agreed timeframe, the complaint will be referred to an Community Complaints Commissioner for equitable, objective and unbiased advice, to assist with a resolution in a timely manner.

1.4.8 Accountability

‘The organisation should ensure that accountability for and reporting on the actions and decisions of the organisation with respect to complaints handling is clearly established’.

The accountability for and reporting on the actions and decisions with respect to complaints handling are outlined in this document.

1.4.9 Continual improvement

‘The continual improvement of the complaints-handling process and the quality of products should be a permanent objective of the organisation’.

This construction complaints management system will be reviewed and reissued annually, or as required.
2 Receiving complaints

Sydney Metro has established the following tools for receiving complaints from the community. At a minimum, the telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the start of construction for each project. This information will also be provided on the Sydney Metro website.

 Contractors will be encouraged to develop other innovative ways to distribute these tools to the community.

Table 2 Community contact tools

<table>
<thead>
<tr>
<th>Tools</th>
<th>Explanation and purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community information line</td>
<td>This allows stakeholders and the community to have access to the project teams 24 hours a day during construction. All communication materials and the website will include the community information line number. During construction, calls will be redirected to relevant contractors as required.</td>
</tr>
<tr>
<td>Community email address</td>
<td>This allows stakeholders and the community to have access to the project teams. All communication materials and the website will include the community email address. During construction, emails will be redirected to relevant contractors as required.</td>
</tr>
<tr>
<td>Community post box</td>
<td>This central postal address allows stakeholders and the community to have access to the project teams. The website will include a central Sydney Metro community postal address. Correspondence will be redirected to relevant project teams and contractors as required.</td>
</tr>
</tbody>
</table>
| Sydney Metro website      | Information about the project will be uploaded to Sydney Metro website. The website will be referenced in all communication materials as a source of information and will be updated on a regular basis. Information will include:  
  - Project information including:  
    - Description of the project, current status and timing  
    - Newsletters  
    - Notifications  
    - Up-to-date project information  
    - Graphics and images on the project background and progress  
    - Copies of relevant reports  
    - Photos, images and maps  
    - Links to documents as required under the relevant projects Conditions of Approval  
    - A link to Sydney Metro contractor webpages  
  - Contact information |
3 Classification of complaints

Complaints may include any interaction with a community member or stakeholder who expresses dissatisfaction with the project, policies, contractor’s services, staff members, actions or proposed actions of Sydney Metro.

Sydney Metro classifies complaints into two categories for reporting purposes:

- Unavoidable complaints
- Avoidable complaints.

The main aim of these complaint categories is to record complaints received, but not unfairly penalise our contractors for complaints received about works they have approval to do.

3.1 Unavoidable complaints

Unavoidable complaints include a stakeholder’s opposition to the project or government policy or complaints about issues that are within project planning approvals.

For example:

- A complaint about noise generated at night when planning approval has been granted for night works and noise generated is within approved criteria.
- A complaint about how traffic is being controlled when the approved Traffic Management Plan is being implemented.

3.2 Avoidable complaints

Complaints about issues outside planning approval, or a commitment that has been given to the community or stakeholders. These commitments may be contained in staff inductions or written notifications.

For example:

- A complaint about noise at night where work is being performed outside of approved criteria. For example: work outside of approved (or notified) construction hours or approved noise levels.
- A complaint about how traffic is being controlled. Only applies when the approved Traffic Management Plan is not being implemented.
- A complaint about cars parking in parklands when the notification has stated we would not park cars in the parklands.
- A complaint about poor worker behaviour, for example: littering, swearing, poor driving behaviour, when an induction has specified that behaviour is not acceptable.

3.3 Determining a unavoidable complaint

When categorising a complaint as ‘unavoidable’ evidence should be referred to in the complaint notes about why the complaint has been categorised this way. The following types of evidence could be referred to in the complaint notes entered on Consultation Manager.
3.3.1 Evidence required to determine an unavoidable complaint

### Table 3 Evidence required

<table>
<thead>
<tr>
<th>Issues</th>
<th>Evidence required</th>
</tr>
</thead>
</table>
| **Air Quality**                 | • Construction Air Quality Management Plan implementation.  
• Control measures in place.  
• Implementation of all feasible and reasonable dust mitigation measures.                                                                                                                                 |
| **Biodiversity (plants and animals)** | • Construction Flora and Fauna Management Plan implementation.  
• Nest Box Plan implementation.  
• Surveys and relocation of threatened species and habitat features.  
• Consultation undertaken with Councils and relevant stakeholders (Bushcare etc) prior to clearing next to bushland restoration works.  
• Re-routing of walking tracks and signage.                                                                                                           |
| **Community Liaison/Notifications** | • Community Liaison Plan implementation.  
• Business Management Plan implementation.  
• Notifications and delivery times.  
• Appropriate response times.                                                                                                                                                                 |
| **Construction hours**          | • See ‘Noise and vibration’.                                                                                                                                                                                          |
| **Construction site**           | • Construction Compound and Ancillary Facilities Management Plan implementation.                                                                                                                                   |
| **Geotech/Surveys**             | • See 'Noise and vibration’.  
• See 'Property and business impacts'.                                                                                                                                                                              |
| **Heritage**                    | • Construction Heritage Management Plan implementation.  
• Archival recording of affected heritage items.                                                                                                                                                                       |
| **Land use and community facilities** | • Consultation with key stakeholders to address impacts and agree on mitigation and management measures.                                                                                                           |
| **Noise and vibration**         | • Construction Noise and Vibration Management Plan implementation.  
• Confirm work was being undertaken within construction hours.  
• Noise monitoring results.  
• Vibration monitoring results.  
• Offer made for attended noise monitoring and results  
• In the case of work outside standard construction hours or impulsive or tonal noise, evidence of respite periods provided.  
• A negotiated agreement with affected receivers where noise and vibration levels cannot be achieved.  
• Consultation with sensitive receivers.                                                                                                      |
| **Out of hours work**           | • Evidence of the Construction Noise Impact Statement implementation.  
• Evidence of noise levels within 'noise goals' for the specific out of hours work activity.                                                                                                                    |
<table>
<thead>
<tr>
<th>Issues</th>
<th>Evidence required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property and business impacts</td>
<td>• Details of protection measures in place.</td>
</tr>
<tr>
<td></td>
<td>• Business Management Plan implementation.</td>
</tr>
<tr>
<td></td>
<td>• Referral to the Independent Property Impact Assessment Panel if required.</td>
</tr>
<tr>
<td>Transport, traffic and access</td>
<td>• Construction Traffic Management Plan implementation.</td>
</tr>
<tr>
<td></td>
<td>• Maintenance of private property access unless otherwise agreed.</td>
</tr>
<tr>
<td></td>
<td>• Reinstatement of landowner access to equivalent standard.</td>
</tr>
<tr>
<td></td>
<td>• Alternative parking arrangements implemented where impacts to on and off street parking exceed four weeks.</td>
</tr>
<tr>
<td></td>
<td>• Alternative pedestrian routes provided and signposted.</td>
</tr>
<tr>
<td>Utilities and services</td>
<td>• Residents and businesses advised of disruptions.</td>
</tr>
<tr>
<td>Visual amenity</td>
<td>• Visual Amenity Plan implementation</td>
</tr>
<tr>
<td></td>
<td>• Implementation of all feasible and reasonable measures ie: retaining existing vegetation, temporary landscaping, minimising light spill, architectural treatments in temporary structures.</td>
</tr>
<tr>
<td>Waste management and spoil</td>
<td>• Construction Environmental Management Plan implementation.</td>
</tr>
<tr>
<td></td>
<td>• See ‘Worker behaviour’.</td>
</tr>
<tr>
<td>Water quality</td>
<td>• Construction Soil and Water Management Plan implementation.</td>
</tr>
<tr>
<td></td>
<td>• Sediment control measures in place.</td>
</tr>
<tr>
<td></td>
<td>• Water monitoring results within required parameters.</td>
</tr>
<tr>
<td>Worker behaviour</td>
<td>• Induction processes or toolbox information followed.</td>
</tr>
</tbody>
</table>

### 3.4 Resolving classification

If the Sydney Metro Project Communications team and the contractor cannot agree on a classification of unavoidable, the Independent Environment Representative maybe able to assist in classifying the complaint as it relates to the planning approval or commitments given to the community.
4 Responding to complaints

4.1 Receiving a complaint
As outlined in Table 4, telephone contact should be made with a complainant where a phone number is provided or available on Consultation Manager. All team members should exercise the following telephone techniques, to establish the nature of the complaint and the needs of the complainant.

This includes:
- Active listening
- Reducing barriers
- Open and closed questioning
- Summarising the call
- Confirming level of satisfaction with the actions and timeframes.

4.2 Referring complaints
Regardless of how a complaint is received, it must be referred to the most appropriate person as soon as they are received. The following table outlines the referral process.

Table 4 Guideline for referring complaints

<table>
<thead>
<tr>
<th>Type of complaint</th>
<th>Description</th>
<th>Referred to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Early construction works</td>
<td>Complaint is about early works activities or the early works contractor</td>
<td>Place Manager, Early Works or contractor representative</td>
</tr>
<tr>
<td>Construction site specific</td>
<td>Complaint is about construction work, behaviour or activities at/or around a Sydney Metro construction site (except early construction works)</td>
<td>Relevant construction contractor representative</td>
</tr>
<tr>
<td>Overall project or government policy</td>
<td>Complaint about the need for the project, the projects procedures or processes the approval process, or TfNSW policy position</td>
<td>Sydney Metro Principal Manager, Project Communications</td>
</tr>
<tr>
<td>Media</td>
<td>Complaint has come via a member of a media organisation</td>
<td>Sydney Metro Principal Manager, Public Affairs</td>
</tr>
<tr>
<td>Government or ministerial enquiry</td>
<td>Complaint has come via a member of a local, state or federal government body, government department or ministerial department</td>
<td>Sydney Metro Principal Manager, Stakeholder Management</td>
</tr>
<tr>
<td>Unrelated to Sydney Metro</td>
<td>Complaint is unrelated to Sydney Metro</td>
<td>Sydney Metro Principal Manager, Project Communications</td>
</tr>
</tbody>
</table>
### Type of complaint

<table>
<thead>
<tr>
<th>Description</th>
<th>Referred to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complaint related to precinct planning around Sydney Metro station sites</td>
<td>Sydney Metro Principal Manager, Project Communications</td>
</tr>
<tr>
<td>Complaint is unrelated to Sydney Metro but relates to other areas of TfNSW</td>
<td>Relevant area of TfNSW</td>
</tr>
</tbody>
</table>

### 4.3 Responding to complaints (not related to construction)

1. **Stakeholder complaint received**
2. Complaint referred to Sydney Metro Principal Manager, Project Communications
3. **Complaint can be resolved within agreed timeframe**
   - **YES**
     - Record complaint in Consultation Manager within 24-hours
     - Finalise complaint record in Consultation Manager
4. **NO**
   - **YES**
     - Advise Executive Director, Communication and Engagement
     - Record complaint in Consultation Manager within 24-hours
     - Complaint can be resolved within agreed timeframe
     - **YES**
       - Escalate complaint according to Section 5
     - **NO**
       - Update complaint record in Consultation Manager
4.4 Responding to construction complaints

Stakeholder complaint received

Complaint referred according to Table 4

Manage complaint and resolve within agreed timeframe according to the relevant approved contractor complaints management procedure.

Complaint can be resolved within agreed timeframe

YES

Contractor to record complaint in Consultation Manager within 24-hours

NO

Complaint could result in media or ministerial interest or community protest

Record complaint in Consultation Manager within 24-hours

Advise Sydney Metro Principal Manager, Project Communications who may assist with resolving the complaint

Complaint can be resolved within agreed timeframe

YES

Finalise complaint record in Consultation Manager

NO

Update complaint record in Consultation Manager

Escalate complaint according to Section 5
5 Complaint escalation procedure

5.1 When to escalate a complaint

Complaints should be escalated when:

- The complaint cannot be resolved using the procedure in section 4, within a timeframe agreed to by the complainant.
- The nature of the complaint falls into one of the following categories:
  - An activity generates three complaints within a 24-hour period (separate complainants).
  - Any construction site receives three different complaints within a 24-hour period.
  - A single complainant reports three or more complaints within a three day period.
  - A complainant threatens to escalate their issue to the media or government representative.
  - The complaint was avoidable.

Complaints would first be escalated to the Sydney Metro Principal Manager, Project Communications as the designated complaints handling management representative for the relevant project.

5.1.1 Role of the Community Complaints Commissioner

If the complaints handling management representative for the project is unable to resolve the complaint, it would be escalated to the project Community Complaints Commissioner (known as the Independent Mediator on Sydney Metro Northwest).

The role of the Community Complaints Commissioner will be to:

- Provide a neutral third party to help resolve complaints;
- Assist in negotiating a mutually acceptable agreement between the complainant, the Sydney Metro Project Communications team and the relevant contractor team;
- Make recommendations about the resolution of individual complaints;
- Ensure the recommendations have been implemented by the project team once they have been approved;
- Keep a record of all complaints which have been referred to them and the actions taken to manage those complaints;
- Refer to the Acoustics Advisor and the Environmental Representative as required by the specific project approval; and
- Provide reports of these actions to the Secretary on request.

The Community Complaints Commissioner will not act before Sydney Metro has provided an initial response to a complaint and will not consider issues such as property acquisition where other dispute processes are provided for, or clear government policy and resolution processes are available, or matters which are not within the scope of the Project.
5.2 How to escalate a complaint

*DPE – Department of Planning and Environment (formerly Department of Planning and Infrastructure – DoPI)*
6 Complaints Register

In accordance with project planning approvals, all complaints are recorded on a complaint register. For the purposes of Sydney Metro, complaints are recorded on the Consultation Manager database.

6.1 Complaint identification number

A unique identification number should be assigned to each new complaint to help track the complaint in Consultation Manager. The complaint identification number is created using the date (Year/Month/Day) and first four letters of the complainant’s surname (or ‘ANON’ where the stakeholder does not want their contact details recorded).

For example, this is the complaint identification number for a complaint from ‘Smith’ on the 22 October 2016.

| 1 | 6 | 1 | 0 | 2 | 2 | S | M | I | T |

6.2 Consultation Manager

All complaints must be recorded in Consultation Manager in accordance with Consultation Manager data entry procedure. This is necessary to enable management of the complaint and monitoring of response times.

6.2.1 Template

A template complaint entry has been created in Consultation Manager to help with data entry. To open the template:

Follow (then delete) the instructions:
At a minimum, your entry should look like this:

- **Event Type**: [Select how the complaint was received ie: phone or email].
- **Event Date**: The date/time the complaint was received (not the date/time it was entered).
- **Event End Date**: The date/time the complaint was CLOSED.
- **Location**: Not required – leave blank.
- **Sentiment**: Select the type of complaint [Avoidable, Not related, TBD (to be determined) or Unavoidable]
- **Project phase**: [Select phase]
- **Summary**: [Insert complaint identification number] - [insert status – (Open/Closed)].
- **Stakeholder Comments**:
  - **Phone call** – record all details from the stakeholder complaint form (use sub-headings).
  - **Email** – Cut and paste the email including header details.
  - **Letter/fax** – Paraphrase main points and include Objective document reference number.
- **Team Response**: Details of any actions undertaken or proposed or investigations occurring.
- **Issues**: Select one or more issues from the list that were relevant to the complaint
- **Project**: [Select the relevant project/s].
- **Stakeholders**: Add all stakeholders involved in the complaint.
- **Team members**: Add all team members involved in handling the complaint.
- **Properties**: Add the stakeholder's property (if relevant ie: the stakeholder has a property linked to their profile).
- **Actions**: Use ‘actions’ to record tasks and follow-up correspondence, For example:
  - To notify the Sydney Metro Project Communications team including Place Managers (as required), Executive Director Communication and Engagement, the Environmental
Representative and the Principal Manager, Sustainability and Environmental Planning that the complaint has been received

- Follow-up phone calls or emails to the complainant to resolve the complaint
- Internal investigations to resolve the complaint
- The evidence required to support the classification of the complaint as unavoidable
- Complaint referrals to other contractors or team members
- Complaint escalation to Sydney Metro or the Community Complaints Commissioner.

Any new complaints made by the same stakeholder should be recorded separately and have their own complaint identification number.
7 Reporting on complaints

7.1 Daily reporting to Transport for NSW
Contractors are required to report daily on complaints received to the following project team members:

- Sydney Metro Principal Manager, Project Communications
- Environmental Representative
- Acoustic Advisor (C&SW only)
- Sydney Metro Principal Manager, Sustainability and Environmental Planning
- Sydney Metro Contract Officer, Project Communications.

The Daily Complaints Report must as a minimum address and detail: Information on complaints received

- Types of complaints (‘Avoidable’ or ‘Unavoidable’)  
- Response times  
- Details of any actions undertaken or proposed or investigations occurring.

Daily reports should be issued regardless of the number of complaints received. If no complaints are received contractors are still required to issue a ‘Nil complaints’ report.

7.2 Daily complaint reporting to the EPA
Contractors are required to report daily on complaints received to the Environmental Protection Authority. Details of reporting requirements are outline in the individual contractors Environmental Protection Licences.

7.3 Monthly reporting to Transport for NSW
All complaints should be reported on a monthly basis to the following project team members:

- Sydney Metro Principal Manager, Project Communications  
- Sydney Metro Contract Officer, Project Communications

The Monthly Complaints Report must as a minimum address and detail:

- Number of complaints received
- Types of complaints (‘Avoidable’ or ‘Unavoidable’)  
- Status of the complaints
- Issues raised
- Action taken to resolve or proposed actions
- Location of complainant
• Response times
• Investigations outstanding
• How lessons learnt are being applied across the project to avoid the complaint recurring.
Appendix A  Environmental Representative endorsement letter
Mr Stuart Hodgson
Principal Manager,
Program Sustainability Environment & Planning
Sydney Metro
Transport for NSW
PO Box 588
NORTH RYDE BC NSW 1670

Dear Stuart

RE: Endorsement of Sydney Metro Overarching Community Communications Strategy and Complaints Management System

Thank you for providing the following documents for Environmental Representative (ER) review and endorsement as required by the Condition of Approval A24 (d) of the Sydney Metro City & Southwest project (SSI – 15_7400 January 9 2017).

- Sydney Metro City & Southwest Overarching Community Communications Strategy (Rev 5.2, 15 March 2017); and

As an approved ER for the Sydney Metro City & Southwest project, I have reviewed and provided comment on these documents and now consider them appropriate for implementation as an overarching program for managing community information, consultation and involvement, and well as complaint management across the Sydney Metro City & Southwest project.

Note that the Overarching Community Communications Strategy requires Specific Community Communications Strategies to be developed and implemented for each works package. As each specific strategy is developed to meet the delivery program, these will also be reviewed, endorsed by the ER, and submitted to the Secretary for approval as required.

Yours sincerely

Jo Robertson

Leaders in Environmental Consulting