



## Procedure 9.02 – Complaint Handling

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### 1. Application

This Procedure applies to NQBP Personnel.

### 2. Policy

Under Policy 9 – Stakeholder Engagement and Corporate Communications, all directors, employees and contractors of NQBP have an obligation to consult with External Affairs at the inception of all projects and business activities requiring media contact, social media interaction, public relations, marketing, graphic design, community consultation, photography, video production and external websites.

This ensures consistency in communication and in assessing requests for community support, protects NQBPs reputation, recognises the role of NQBP's shareholders and protects information which is commercially sensitive.

Only NQBP employees and contractors with clear corporate responsibility for engaging with community, government, and other external stakeholders are authorised to represent the Corporation via public statement or presentation of material.

NQBP builds trust with our internal and external stakeholders by communicating consistently, openly and honestly.

The most important factor in managing our reputation is the experiences individuals have with NQBP people. The NQBP Values and Code of Conduct provides a guideline for meeting the expectations of stakeholders.

NQBP takes complaints seriously. We believe complaints should be easy to report, they should be acknowledged, and dealt with quickly, fairly and sensitively. The following procedure, which has been developed in accordance with our organisational values, has been developed to give effect to this policy position.

### Scope

NQBP defines complaints as expressions of dissatisfaction about an action or actions by NQBP that have been made by an external party (anonymous or otherwise) and which requests or requires a response.

This procedure applies to all complaints received from an external party relating to one or more of NQBP's sites, or are directly or indirectly related to one or more of NQBP's business activities.

The procedure does not apply to:

- Environmental complaints (incidents) are handled via the Environment Management Manual and are not in scope;
- Internal complaints are handled via NQBP's Grievance Resolution Procedure and Whistleblower Protection and are not in scope;
- Customer complaints – if a customer is not satisfied with the service/product offered or provided this should be dealt with by the Commerce and Trade team and are not in scope
- Day-to-day or routine activities (for example, routine maintenance work that is managed by site maintenance management systems or issues such as broken lights in an office) are not complaints. Similarly, conversations or interactions with others to gain an understanding of a work situation and to discuss aspects of that activity for opportunities for improvement are not complaints.

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### Unreasonable complainant conduct (UCC) and vexatious or frivolous complaints

If a complaint is made alleging unethical or illegal behavior by an NQBP employee or contractor, complaints can also be reported according to Procedure 3.08 – Grievance Resolution or Procedure 2.06 – Whistleblower and Public Interest Disclosure depending on the nature of the complaint.

NQBP has a zero tolerance policy towards any harm, abuse or threats directed towards employees and contractors. Most complainants will act reasonably and responsibly even when they are experiencing high levels of distress, frustration and anger about their complaint. However, in a very small number of cases, some complainants may behave in ways that are inappropriate and unacceptable, such as threaten violence or become verbally abusive.

Any unreasonable conduct such as this, or vexatious and frivolous complaints will be brought to the attention of the Chief Executive Officer (CEO), who may authorise a variation from this procedure in responding to a complainant.

### Receiving Complains

A complaint can be lodged with NQBP in a number of ways such as:

- verbally, for example at a public forum or by telephone;
- via email – to [info@nqbp.com.au](mailto:info@nqbp.com.au) or to any other NQBP email account;
- by completing the online form on NQBP’s website: [www.nqbp.com.au](http://www.nqbp.com.au); or
- by mail or a similar form of written communication posted or hand delivered to an NQBP office or representative.

Depending on the nature of the complaint reference should be made to Procedure 3.08 – Grievance Resolution or Procedure or Procedure 2.06 – Whistleblower and Public Interest Disclosure.

If a complaint is made verbally, the NQBP officer will ask for as much detail as possible in order for complaints to be dealt with appropriately and thoroughly. For example, the officer should ask the complainant for:

- relevant dates;
- the specific nature of the complaint;
- names of NQBP representatives they have dealt with previously (if relevant); and
- the location (where the complaint relates to).

### Responsiveness

When a complaint is received, the NQBP officer who has received the complaint will forward a written notification to the Regional Stakeholder Engagement Officer and the Media and Community Engagement Officer in the External Affairs team to record on NQBP’s Complaints Register. The Register entry will include the following details:

- date of contact;
- relevant port;
- stakeholder issue / category
- stakeholders name and affiliation;
- summary of complaint;
- action planned to resolve complaint; and
- status of complaint.

Issues or categories include:

- Property
- Maintenance
- Commercial
- Engineering
- Operations
- External Affairs
- Community

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If the complaint is received in writing, the External Affairs team will send an acknowledgement to the complainant within seven days outlining the details of the complaints procedure and when they can expect to hear the outcome of their complaint.

It is essential that complaints are dealt with professionally, efficiently and impartially. It is equally important that complaints are dealt with as quickly as possible with the complainant being treated with courtesy and respect.

A complainant can expect their complaint to be dealt with within 28 days of lodging a complaint. The final resolution will include:

- a summary of the complaint;
- steps taken to reach the resolution (including any engagement with the complainant that seeks to understand their preferences for resolution, as well as consideration of relevant legislation or policies);
- sources of information (maintaining privacy of individuals and commercial contracts where appropriate); and
- how the outcome will be recorded.

The relevant manager is responsible for ensuring the complaint is dealt with according to the timelines outlined to the complainant.

Remedies for resolving the complaint will take into consideration relevant legislation and policy and involve recording all relevant information obtained during the investigation. All information will be considered with sound reasons provided for decisions made and offering remedies.

A number of strategies can be used to manage complaints and, in particular, those considered as 'Unreasonable Complainant conduct', frivolous or vexatious. These may include:

- alternative dispute resolution strategies to deal with conflicts involving complainants and members of our organisation;
- escalation of complaints to the CEO for consideration if the matter remains unsatisfactorily resolved;
- legal instruments such as trespass laws or legislation to prevent a complainant from coming onto NQBP premises, as well as orders to protect specific employees or contractors from any actual or perceived threats.

### 3. Stakeholder Engagement and Corporate Communications Policy, Procedure, Standard and Legislative Framework

NQBP is a Government Owned Corporation and a port authority and is required to comply with its own policies, prescribed applicable legislation and State Government policies and procedures. This policy should be read in conjunction with:

- a. Policy 9 - Stakeholder Engagement and Corporate Communications
- b. Procedure 2.05 – Whistleblower Protection
- c. Procedure 2.06 – Whistleblower and Public Interest Disclosure
- d. Procedure 3.08 – Grievance Resolution
- e. Procedure 9.05 – Stakeholder Management
- f. Procedure 9.02 – Complaint Handling
- g. Procedure 9.04 – Corporate Identity
- h. Procedure 9.02 – Media Enquiries
- i. Standard 2.01 - Code of Conduct
- j. Standards – AA1000 Stakeholder Engagement Standard
- k. *Privacy Act 1988* and the National Privacy Principles (NPPs)

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**4. Procedure Review Date**

This procedure should be reviewed by 31 January 2019.

**5. Definitions**

**Contractors:** means contractors or consultants engaged by NQBP under a personal services consultancy agreement or other similar arrangements.

**NQBP:** means North Queensland Bulk Ports Corporation Limited ACN 136 880 128.

**NQBP Employee:** means employees and Contractors of NQBP but does not include NQBP directors.

**NQBP Personnel:** means NQBP officers (for example NQBP directors) and NQBP Employees.

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