

Prepared for Gaw Maoneng Renewables

Complaint Investigation and Response Procedure Mornington Battery Energy Storage System (BESS)

August 2023

Project Number: 23-040

PLANNING and ENVIRONMENT ACT
MORNINGTON PENINSULA PLANNING
SCHEME

PERMIT NO. PA2001067

Condition 48

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Sheet 1 of 23

A. Greenfield

Signed: for
MINISTER FOR PLANNING

Date: 6 September 2024

Document verification

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Acronyms and abbreviations

BESS	Battery Energy Storage System
CBD	Central business district
CEO	Chief Executive Officer
CIRP	Complaint Investigation and Response Procedure
Council	Mornington Peninsula Shire Council
CMS	Complaints Management System
CRC	Community Relations Coordinator
EMP	Environmental Management Plan
EPC	Engineering, Procurement and Construction
GMR	Gaw Maoneng Renewables
LEP	Local Environment Plan
LGA	Local government area
MW	Megawatt
VIC	Victoria



1. Introduction

1.1. Background

Gaw Maoneng Renewables (GMR) received development approval for the use and development of a utility installation (Battery Energy Storage System (BESS)) and the removal of native vegetation (the Project) on 10 January 2022. The Project, located on the Mornington Peninsula, approximately 67 kilometres (km) from the Melbourne central business district (CBD), would occupy an area of approximately 6.6 hectares (ha) and will have a power rating of 240 megawatts (MW).

Australia's energy market is undergoing significant changes and utility scale batteries are pivotal to enabling the shift from a fossil fuel energy baseload to renewable energy. The Project would connect to the electricity network via the existing AusNet Services Limited (AusNet) Tyabb substation.

In order to comply with Planning Permit PA2001067, a Complaint Investigation and Response Procedure (CIRP) is required.

1.2. Scope

This CIRP applies to GMR staff and all contractors associated with the Project. This CIRP will be implemented throughout the construction and operation of the Project and applies to the following aspects:

- Noise
- Construction impacts, e.g. waste and litter
- Traffic impacts, e.g. dust
- Environmental impacts
- Safety
- Compliance.

1.3. Application

GMR, the proponent and permit holder for the Project, is responsible for the effective implementation and management of this CIRP, including all internal and external reporting requirements, in accordance with Planning Permit PA2001067, as issued by the Minister for Planning.

It is the intent that the systems outlined in this CIRP will be maintained by the owner throughout the construction and operational phases of the Project.

This Project must also meet the requirements of applicable GMR policies, in relation to the handling and management of enquiries and complaints received in relation to GMR projects. NGH Pty Ltd (NGH) has prepared this document on behalf of GMR.

This document is not applicable to disputes referred outside the organisation for resolution or for employment related disputes including grievances.

1.4. Referenced documents

This CIRP has been developed to satisfy the following applicable legal and corporate requirements:

- Conditions 48 – 52 of Planning Permit PA2001067
- *The Privacy Act 1998*



- AS/NZ 10002:2022 Guidelines for complaint management in organisations (formerly AS/NZ 10002:2014).

Condition 49 of the Permit stipulates that once endorsed, the CIRP will be made publicly available via the BESS facility project website:

<https://morningtonbess.com.au/>

1.5. Definitions

Definitions applicable to the CIRP are provided in Table 1-1.

Table 1-1 Definitions applicable to the CIRP

Term	Definition
GMR	Gaw Maoneng Renewables, the company responsible for the construction and operation of the Project.
The Project	The use and development of a utility installation (Battery Energy Storage System (BESS)) and the removal of native vegetation.
Community Relations Coordinator	The employee of the company (GMR) responsible for the construction / operation of the Project, who is responsible for engaging with members of the public and managing the Complaint investigation and response process.
Complainant	Person, organisation or their representative (including clients, consumers, service users, customers, etc.) making a complaint.
Complaint	Expression of dissatisfaction made to or about GMR, relating to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
Complaint management system	Encompasses all aspects of the policies, procedures, practices, staff, hardware and software used by an organisation for the management of complaints.
Disputes	Unresolved complaints escalated internally, externally, or both.
Unreasonable conduct	By complainants – any behaviour by a person which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the people involved in the complaint process.

1.6. Document structure

As per Condition 48(b) of the planning permit, this CIRP has been prepared in accordance with AS/NZ 10002:2022 *Guidelines for complaints handling in organisations* (formerly AS/NZ 10002:2014). This CIRP has been structured to reflect these standards, as can be shown in Table 1-2 below.

Table 1-2 Alignment of CIRP with AS/NZ 10002:2022

AS/NZ 10002:2022 reference	Where addressed in Project CIRP
1 – Scope	Section 1.2
2 – Application	Section 1.3
3 – Normative references	Section 1.4
4 – Terms and definitions	Section 1.5
5.1 – Enabling complaints	Section 2
5.2 – Managing complaints	Section 3
5.3 – Managing the parties	Section 3.3 and Section 3.4
5.4 – Accountability, learning and prevention	Section 4
6 – Complaint management framework	This CIRP and referenced GMR policies
7 – Planning and design	This CIRP
7.1 – System	Section 3.3 and Section 3.4
7.2 – Review process	Section 3.5 and Section 3.6
7.3 – Procedures	Section 3.5 and Section 3.6
7.4 – Resources	Section 6
7.5 – Integration with public relations / media	Section 2.3
7.6 – Training	Section 3.2

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AS/NZ 10002:2022 reference	Where addressed in Project CIRP
8 – Operation of the complaint handling system	Section 2 through to Section 6
9 – Maintenance and improvement	Section 8

1.7. Satisfaction of the permit conditions

Conditions relevant to the CIRP, as provided in Planning Permit PA2001067, are provided in Table 1-3, along with a reference as to where they have been addressed in this document.

Table 1-3 Relevant planning permit conditions

No.	Condition	Reference
48	Before development commences, a Complaint Investigation and Response Plan (CIRP) must be submitted to, approved and endorsed by the responsible authority. Once endorsed, the CIRP will form part of the permit. The CIRP must: - Respond to all aspects of the construction and operation of the BESS facility. - Be prepared in accordance with Australian/New Zealand Standard AS/NZS 10002:2014 – Guidelines for Complaint Management in Organisations. - Include a process to investigate and resolve complaints (different processes may be required for different types of complaints). The endorsed CIRP must be implemented to the satisfaction of the responsible authority.	This Plan
49	Before development commences, the following information must be made publicly available and readily accessible from the BESS facility project website, or another publicly available resource to the satisfaction of the responsible authority: - A copy of the endorsed CIRP. - A toll-free telephone number and email contact for complaints and queries to the BESS facility operator.	Section 2.4
50	Before development commences, a Complaints Register must be established	Appendix B

No.	Condition	Reference
	which records: a) The complainant's name and address (if provided). b) A receipt number for each complaint, which must be communicated to the complainant. c) The time and date of the incident, and operational conditions at the time of the incident. d) A description of the complainant's concerns. e) The process for investigating the complaint, and the outcome of the investigation, including the actions taken to resolve the complaint.	
51	All complaints received must be recorded in the Complaints Register.	Appendix B
52	The complete copy of the Complaints Register must be provided, along with a reference map of complaint locations, to the responsible authority on each anniversary of the date of this permit and at other times on request.	Section 6.2.2 Appendix B



2. Lodgement of enquiries and complaints

2.1. Guiding principles

GMR will comply with the following guiding principles:

- Everyone has a right to complain
- Complainants will be treated with respect
- No detriment to a complainant will result from a complaint being lodged.

In addition to this, GMR will:

- Provide transparency with regard to how and where a complaint can be made
- Seek clarification on whether feedback or general concern is to be handled as a complaint
- Retain the anonymity of the complainant, where relevant
- Ensure accessibility to the Enquiries and Complaint Management System.

2.2. Accessibility

GMR will ensure that the complaints system is accessible to everyone. In addition to this, support will be provided to people seeking to make an enquiry or complaint, as required.

Under no circumstances will GMR charge a fee or levy for receiving and/or processing complaints.

GMR will aim to ensure that the Complaints and Enquiries Management System is well publicised. Information detailing the complaints process will be made publicly available via the methods described in Section 2.3 below.

2.3. Communication

Information concerning the complaints handling process will be provided:

- Via the Project website (refer to section 1.4 of this CIRP)
- At the site office
- In the form of newsletters and leaflets, distributed by GMR.

This information will be made readily available to stakeholders, complainants and other interested parties.

Information will be provided in plain English and in accessible formats, and will include:

- How and where a complaint can be made
- Information to be provided by the complainant
- The complaint handling process, including:
 - The expected timeframes for each stage of the complaints process
 - The complainant's involvement in the process (e.g. the complainant may be able to provide alternative options, which may resolve the issue)
 - The possible or likely outcome of their complaint
 - How the complainant can obtain updates on the progress of their complaint.



2.4. Contact information

Contact details for public enquiries or complaints relating to the Project are provided in Table 2-1.

Table 2-1 Contact details for the Project

Method	Process
In person	By arrangement at the Site Office, Head Office, or another agreed location.
Telephone	1800 476 706
Email	feedback@gmr.energy
Website	www.morningtonbess.com.au/#contact

2.5. Complaints enquiry process

The complaints enquiry process has been detailed in Figure 2-1 below.

2.6. Complaints made to Mornington Peninsula Shire Council

Mornington Peninsula Shire Council (Council) may receive enquiries or complaints relating to the Project. It is also possible that enquiries / complaints lodged with GMR, do not relate to the Project and would be more appropriately handled by Council or another regulator.



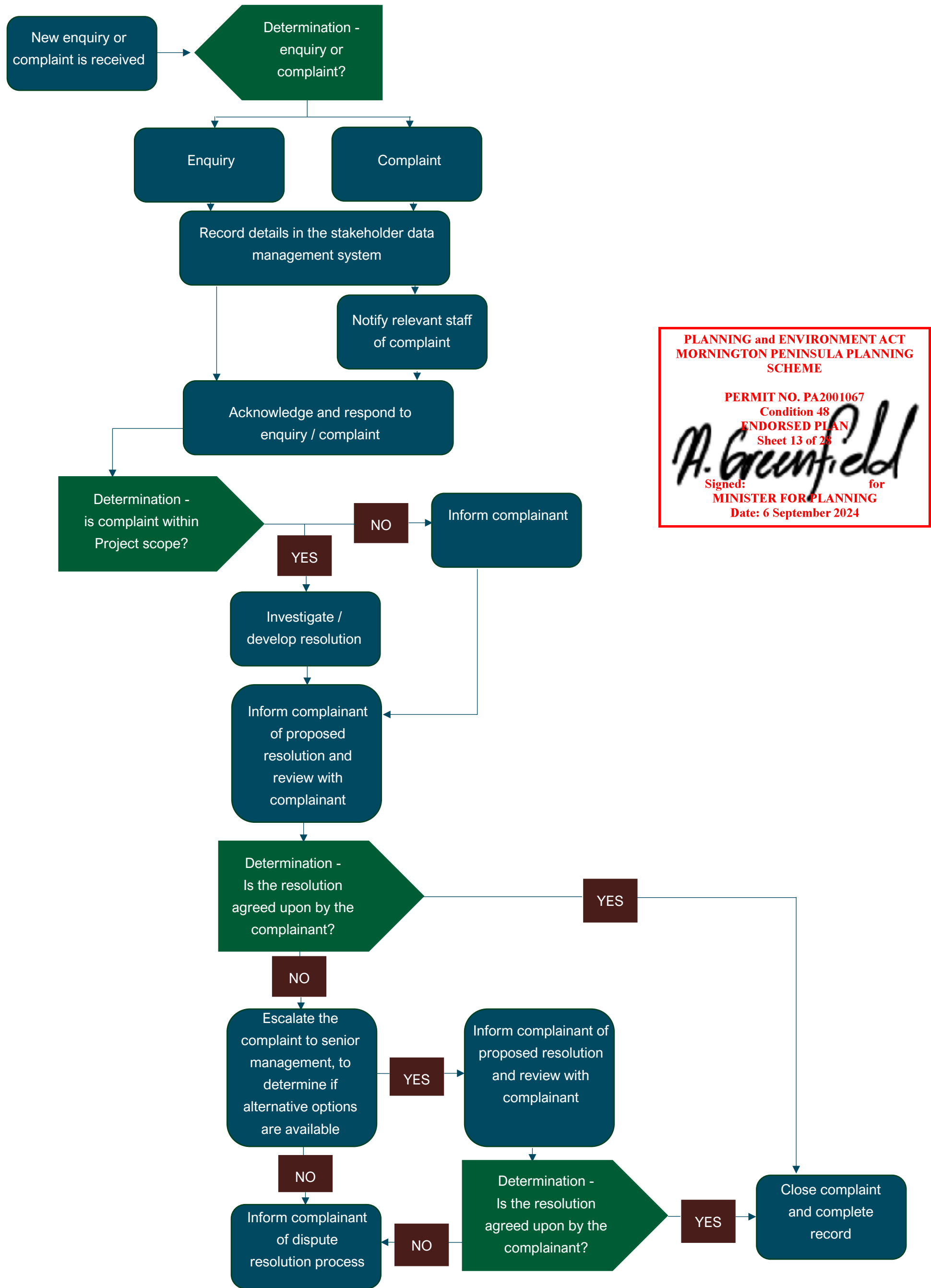


Figure 2-1 Enquiry and complaints process

3. Managing enquiries and complaints

3.1. Guiding principles

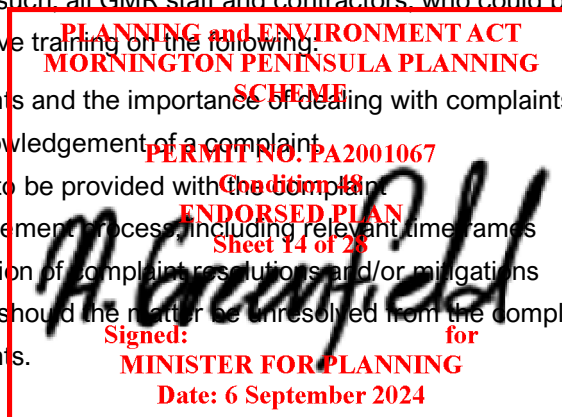
GMR will:

- Acknowledge each enquiry / complaint as soon as is reasonably practicable
- Appropriately distinguish enquiries from complaints, in order to determine the best methods for resolution and closure
- Manage each enquiry / complaint in an objective, unbiased and equitable manner
- Abide by privacy laws and ethical obligations when handling personal information
- Communicate policies, procedures and decisions with relevant complainants and staff.

3.2. Training and awareness

GMR aims to establish and maintain a positive complaint management environment, that encourages both feedback and complaints. As such, all GMR staff and contractors, who could be reasonably expected to receive a complaint, will receive training on the following:

- The value of complaints and the importance of dealing with complaints effectively
- How to provide acknowledgement of a complaint
- Relevant information to be provided with the complaint
- The complaint management process, including relevant time frames
- Effective communication of complaint resolutions and/or mitigations
- Escalation pathways, should the matter be unresolved from the complainants perspective
- Reporting requirements.



3.3. Confidentiality, privacy and fairness

GMR will manage enquiries and complaints in accordance with the following:

- Enquiry / complaint information will be kept confidential
- In the event that information is required to be released to a third party (e.g. Council), appropriate authorisation will be provided by the Community Relations Coordinator (CRC)
- The identity of GMR staff and contractors managing enquiries / complaints will be protected, e.g. the first name of the staff member will be withheld during all correspondence with the complainant
- Personal information relating to complaints will be protected. This includes, but is not limited to the following information:
 - Dates of birth
 - Physical / mental health
 - Financial information
 - Contact information (phone numbers, emails, addresses)
- In the event that multiple parties are involved in an enquiry or complaint, then one representative from each will be identified. A suitable communication strategy will be agreed upon with all parties, where practicable.

3.4. Code of conduct

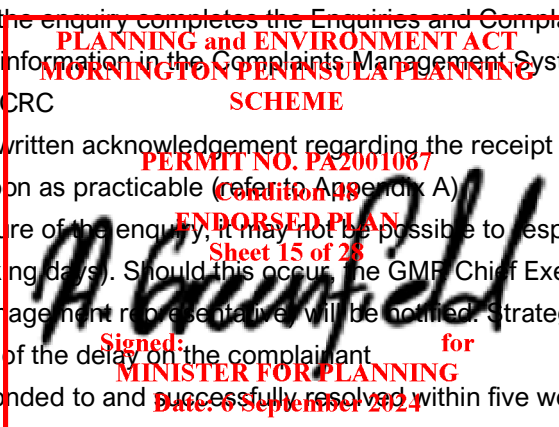
GMR staff and contractors will abide by the following code of conduct:

- Be polite and courteous at all times
- Maintain discretion and confidentiality, as required
- Where the complainants conduct is deemed unacceptable, staff will inform the individual of potential consequences of their behaviour, including:
 - Alternative arrangements being made to handle the complaint
 - Restricting the complaints service provided to the complainant
 - Termination of the complaints process, should the misconduct continue.

3.5. Process for receiving and resolving enquiries

Where possible, the staff member receiving the enquiry will attempt to resolve it immediately. If the enquiry is resolved at the time it is made, no further action is required (refer to 3.6.1 below). If the enquiry cannot be resolved at the time it is made, the following process will be implemented:

1. The person receiving the enquiry completes the Enquiries and Complaints Register (refer to Appendix B), logs the information in the Complaints Management System (CMS) and provides all relevant details to the CRC
2. The CRC will provide written acknowledgement regarding the receipt of the enquiry, within three working days, or as soon as practicable (refer to Appendix A). Depending on the nature of the enquiry, it may not be possible to respond within the expected timeframe (three working days). Should this occur, the GMR Chief Executive Officer (CEO) (or nominated Senior Management representative) will be notified. Strategies will be developed, to minimise any impacts of the delay on the complainant
3. Enquiries will be responded to and successfully resolved within five working days of submission
4. All correspondence will be documented in the Stakeholder Data Management System.



3.6. Process for receiving and responding to complaints

Where possible, the staff member receiving the complaint will attempt to resolve it immediately. If the complaint is resolved at the time it is made, no further action is required (refer to 3.6.1 below). If the complaint cannot be resolved at the time that it is made, the following process will be implemented:

1. The person receiving the enquiry completes the Enquiries and Complaints Register (refer to Appendix B), logs the information in the CMS and provides all relevant details to the CRC.
2. Relevant staff will be notified of the complaint, including but not limited to:
 - GMR Project Manager
 - Engineering, Procurement and Construction (EPC) Project Manager
 - Construction Site Manager
 - Site Environmental Advisor

Once operational, the CRC will handle all complaints relating to the Project.

3. The CRC (or another nominated person, relevant to the complaint) shall acknowledge and provide an initial response to the complaint. Initial response timeframes include:

- Where a complaint is received in person, an initial acknowledgement / response will be provided immediately
 - Where a complaint is received by email / telephone, an initial acknowledgement / response will be provided within 24 hours of the complaint being received
 - Where a complaint is received by mail and no email / phone contact is provided, an initial written response will be issued within three working days
4. The initial response to a complainant should:
- Acknowledge that the complaint has been received
 - Request additional information, as required
 - Explain the complaint handling process.

The initial response does not need to include a resolution to the complaint if it is not available at the time. In this instance, a proposed resolution, or an update on the status of the complaint, will be provided no later than five working days after the provision of the initial response.

3.6.1. Situations where an enquiry / complaint does not need to be recorded

A complaint does not need to be recorded:

- If the complaint is appropriately addressed through immediate discussion
- The staff member provides the complainant with the appropriate contact information (refer to Section 2.4) for making a complaint about the Project

Where a complaint has been made and the above does not apply, the complaint receipt process provided in Section 3.6 will be followed.

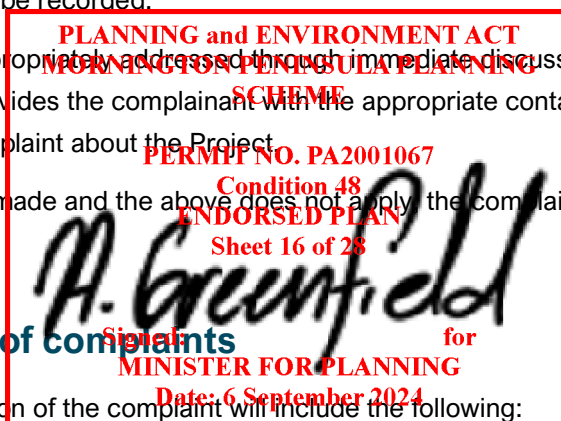
3.7. Investigation of complaints

Once received, the investigation of the complaint will include the following:

1. The CRC and GMR Project Manager (or other nominated person) will assess whether:
 - The complaint is within the Projects scope
 - If more than one issue was raised, whether each issue needs to be separately addressed.

Should any complaint be deemed outside of the Projects scope, the complainant will be notified as soon as possible, and the complaint closed. Notification will include appropriate reasoning as to why the complaint was not within the Project scope.

2. Where a complaint is found to be within the Project scope, the CRC and/or Project Manager may request additional information from the complainant, as required.
3. Other members of the Project team may be asked to investigate the complaint and provide mitigation or resolution measures.
 - If deemed necessary by the Project team, the complaint may be escalated internally to the CEO (or nominated Senior Management representative), for review and resolution.
4. An update on the investigation and any proposed resolutions will be provided to the complainant, no later than five working days of the initial response.
5. Additional updates will be provided to the complainant, as required, until the complaint is closed.



3.8. Resolution of complaints, follow-up, and closure

Once a complaint has been investigated, proposed resolution measures will be communicated to the complainant. When communicating the resolution/s to the complainant, the following information will be included:

- What actions were taken in response to the complaint
- The outcome(s) of these actions, including the resolution/s offered
- The reason/s why the resolution/s were chosen
- A request for feedback from the complainant on whether the resolution/s provided has resolved the complaint
- Information on other reviews, appeals or avenues available to the complainant.

A complaint will be considered closed once a complainant has advised that they consider the complaint to be resolved. Alternatively, if no response has been provided within ten working days, the complaint will be considered closed.

If a complaint is not resolved within thirty (30) working days of receipt, the dispute resolution process detailed in Section 4 of this CIRP will be adopted.

The outcome of a complaint, including any resolutions, mitigations and relevant conversations, will be recorded in the Stakeholder Data Management System and the CMS.



4. Dispute resolution, accountability, learning and prevention

4.1. Guiding principles

GMR will:

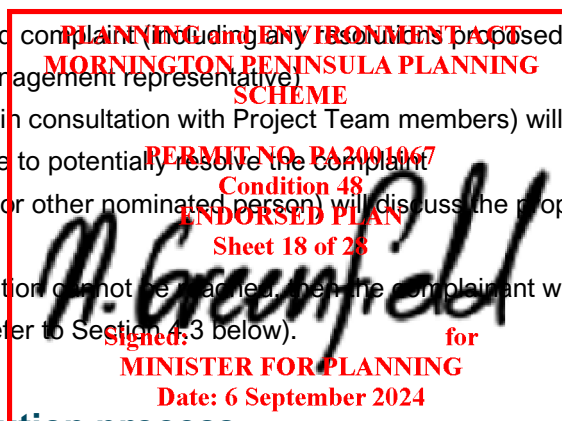
- Be accountable for the operation of its complaint management system
- Seek to minimise the potential for complaints to escalate into ongoing disputes.

GMR will aim to obtain the satisfactory resolution of a complaint / dispute within thirty (30) working days.

4.2. Internal escalation options

If GMR staff are unable to provide a satisfactory resolution for a complainant, internal escalation options may be required. This will include:

- Raising the unresolved complaint (including any resolutions proposed to date) with the CEO (or nominated Senior Management representative)
- Senior Management (in consultation with Project Team members) will determine if another resolution / mitigation is available to potentially resolve the complaint
- Senior Management (or other nominated person) will discuss the proposed resolution / mitigation with the complainant
- If a satisfactory resolution cannot be reached, then the complainant will be advised of the Dispute resolution process (refer to Section 4.3 below).



4.3. Dispute resolution process

Where a satisfactory resolution cannot be made between GMR and a complainant, it may be necessary to involve an independent, impartial third party to facilitate mediation of the dispute.

External mediation requirements will be triggered if a complaint cannot be satisfactorily resolved within thirty (30) days of receipt of the complaint.

Details of the external mediation and facilitator will depend on the:

- Scope of the complaint
- Issues involved in the complaint
- Appropriateness of the facilitator with regard to the matter being resolved.

GMR will constructively participate in any required remediation processes.

The external dispute resolution process will include the following:

1. The CRC will contact the complainant and instigate the external mediation process
2. The CRC will compile all relevant details of the complaint, including investigations conducted and correspondence with the complainant

3. The appointed mediator (external) will organise the time and place for the mediation to occur. Mediation will normally occur within ten (10) days of both parties agreeing to the appointed mediator
4. The complainant and responder (GMR) may need to outline their positions with regard to the complaint, including reasons why any proposed resolutions / mitigations were deemed unsuitable. Other information, relevant to the complaint, may be required by the mediator.
5. At the conclusion of the mediation session, the complainant and responder (GMR) will prepare a written summary of any resolution/s. Both parties must agree on the proposed resolution/s.
6. If external mediation is not successful, the mediator will report this to the CRC. The complainant will be advised of their rights to pursue the matter further.



5. Data collection and record keeping

5.1. Stakeholder Data Management System

All interactions with stakeholders in relation to enquiries and complaints is to be recorded in the Stakeholder Data Management System.

The Stakeholder Data Management System is a secure database that is used for all GMR projects. This system will act as the Complaints Register during the construction and operation of the Project. This system enables the generation of a variety of reports for the review, presenting and auditing of enquiries / complaints throughout the life of the Project.

Information to be recorded in the system includes:

- The complainant's name
- The complainant's address
- Complainant's contact information
- Receipt number of the enquiry / complaint, which is to be provided to the complainant
- Time
- Prevailing conditions at the time of the complaint
- A description of the complainant's concerns
- The process of investigation that will be followed to resolve the complaint
- The resolution sought by the complainant
- Any support requirements required by the enquirer / complainant
- Any other information, relevant to the enquiry / complaint.



6. Monitoring and reporting

6.1. Monitoring

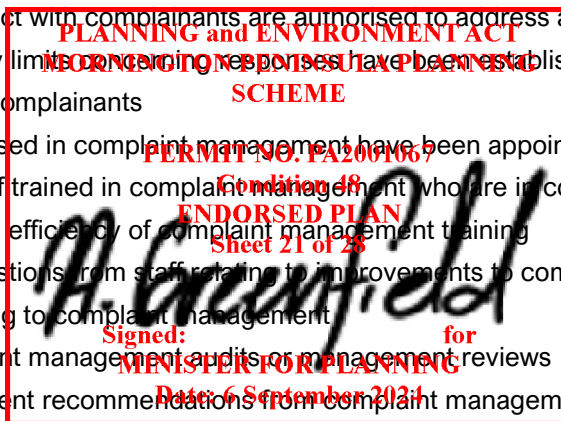
Continual monitoring of the CIRP, including any resources needed and the data to be collected, will be undertaken by GMR.

The performance of the CIRP will be measured against predetermined criteria and monitoring data.

6.1.1. Performance-monitoring criteria

When monitoring the performance of the CIRP, the following criteria will be considered:

- Whether a complaint management policy and objectives have been established, maintained and made appropriately available
- Staff perception of GMRs commitment to complaint management
- Whether responsibilities for complaint management have been appropriately assigned
- Whether staff in contact with complainants are authorised to address a complaint on the spot
- Whether discretionary limits concerning responses have been established for staff when communicating with complainants
- Whether staff specialised in complaint management have been appointed
- The proportion of staff trained in complaint management who are in contact with complainants
- The effectiveness and efficiency of complaint management training
- The number of suggestions from staff relating to improvements to complaint management
- Attitude to staff relating to complaint management
- Frequency of complaint management audits or management reviews
- Time taken to implement recommendations from complaint management audits or management reviews
- Time taken to respond to complainants
- Degree of complainant satisfaction
- Effectiveness and efficiency of the corrective and preventative action processes, where appropriate.



6.1.2. Monitoring data

Monitoring data relating to complaints management is an important indicator of complaint management performance. Monitoring data can include the number of proportions of:

- Complaints received
- Complaints addressed at the point at which they are made
- Complaints incorrectly prioritised
- Complaints acknowledged after agreed timeframes
- Complaints finalised after the specified timeframes
- Complaints referred to external dispute resolution agencies
- Repeat complaints or recurrent problems that have been complained about
- Improvements in procedures due to a complaint.

6.2. Reporting

6.2.1. Internal reporting

Internal reports will be prepared each quarter by the CRC and reviewed by the CEO (and Senior Management). These reports will include:

- Internal and external dispute resolution complaint volumes
- Average response timeframes
- Number of open complaints, in total and by status, with reference to the life cycle of the complaint
- Percentage of open complaints that are within the stated timeframes
- Identification and rectification of systemic issues
- Media associated with any individual complaint or systemic issue.

GMR will ensure that adequate funding and resourcing has been allocated to manage complaints and address systemic issues.

6.2.2. Reporting for the Minister for Planning

Once a year, or on request, a report will be provided to the Minister for Planning, which will include:

- A copy of the Complaints Register (Appendix B)
- A summary of complaints received. Complaints will be grouped according to complaint type and location. Any personal information (e.g. names, addresses) will be removed
- A map detailing the location of where the complaints originated
- A summary of the investigations and any resolutions / mitigations provided
- The outcome of each complaint received.



7. Compliance management

7.1. Roles and responsibilities

Roles and responsibilities relevant to the CIRP are provided in Table 7-1.

Table 7-1 Roles and responsibilities relevant to the CIRP

Role	Responsibilities
Chief Executive Officer (CEO) / Senior Management	- Ensure that a governing body approved CIRP, supported by procedures and objectives, is provided for the Project - Promote awareness of the CIRP - Cultivate a people-focus throughout the company - Ensure that information regarding the complaint management process is easily accessible to members of the public and is communicated in a manner that is easy to understand - Appoint a DRC with clearly defined responsibilities and authority - Ensure there is a process in place for timely and appropriate notification to senior management of any significant complaints - Ensure there is a process for regular internal and external reporting. This includes reporting for the Planning Authority - Ensuring that complaints are managed effectively.
Community Relations Coordinator (CRC)	- Ensure the CIRP is easily accessible to staff / the public - Ensure that complaints are recorded and corrective action is taken to prevent the issue from reoccurring - Establish a process for performance monitoring, evaluation and reporting for the CIRP - Report to CEO (or nominated Senior Management representative) on the operation of the CIRP - Report to CEO (or nominated Senior Management representative) on significant complaints, issues or trends identified - Identify and allocate resources needed for an effective and efficient complaint management system - Implement internal / external escalation procedures for unresolved complaints / disputes - Implement and maintain the CIRP, including: - Recruiting / training appropriate staff - Implementation of appropriate technology - Provision of adequately documented complain management guidance - Setting / meeting key performance indicators for complaint

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Signed: for
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Date: 6 September 2024

Role	Responsibilities
	- management ○ System reviews.
Operational Managers	• Ensure the complaint management system is implemented • Liaise with the CRC • Ensure staff awareness of CIRP and the benefits of receiving complaints • Ensure appropriate staff training is provided (for staff handling complaints) • Report actions / decisions made by staff relating to complaint management to the CRC and/or CEO (or Senior Management)
Staff handling complaints	• Be appropriately trained in complaint management procedures, including specific training on the following: ○ Receiving complaints from people experiencing vulnerability, who may need assistance ○ Cultural awareness • Be able to identify and effectively respond to people's support and communication needs and preferences • Treat complainants in a respectful and courteous manner • Follow all complaint management reporting requirements, as determined by GMR • Follow GMR's complaint management policies and procedures (this CIRP).

7.2. Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, as well as compliancy with this Plan. Audit requirements are detailed in Section 11.1 of the Environmental Management Plan (EMP).

Audits relevant to the CIRP will provide information on:

- Conformity to complaint management procedures
- Suitability to achieve complaint management procedures.

Audit results will be reviewed by management to identify problems and introduce improvements to the CIRP.

8. Review and improvement

8.1. Document review

This CIRP will be reviewed annually, at a minimum. During review of the CIRP, GMR will consider:

- The suitability, adequacy, effectiveness and efficiency of the CIRP
- Identify and address instances of nonconformity with regard to health, safety, environmental, regulatory and other legal requirements
- Identify and correct deficiencies in the CIRP (e.g. as a result of audits)
- Determine the status of corrective and preventative actions
- Assess opportunities for improvement and the need for changes to the complaint management system and the organisations general operations
- Evaluate potential changes to the complaint management policy and procedures
- Assess whether GMR has appropriately identified and addressed the known vulnerabilities of its complainants
- Address recommendations for improvement.

The document review should result in:

- Decisions and actions being made, that relate to the improvement and efficiency of this CIRP
- Decisions relating to identified resource needs (e.g. staff training)

8.2. Continuous improvement

Continuous improvement of this CIRP will be achieved through ongoing evaluations of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity (e.g. via staff feedback, enquiries) for improvement of the CIRP
- Explore, identify and apply best practices in complaint management
- Encourage innovation in complaint management development
- Recognise exemplary complaint management behaviour

The processes described above may result in the need to update or revise this Plan. This will occur as needed.

Only the Site Environmental Advisor, or delegate, has the authority to change any of the environmental management documentation.

A copy of the updated plan and changes will be distributed to all relevant stakeholders.

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A. Greenfield

Signed:

MINISTER FOR PLANNING

Date: 6 September 2024

Appendix A Template - initial response to a complaint

The sample text below should be used as a basis for any written initial response to a complaint. GMR letter headed paper should be used for any printed correspondence.

Dear [name of complainant],

Thank you for your [letter/email] dated [xxx]. We thank you for your correspondence and acknowledge your complaint in relation to [e.g. dust/noise/traffic].

A unique reference number has been allocated to your complaint within our internal Complaint Management System. It is [Stakeholder data management system auto created reference].

GMR takes compliance and community relations very seriously. We are committed to working with the community to ensure the Mornington Battery Energy Storage System is meeting the compliance requirements of the Project Approval and limiting any adverse impacts arising from the project.

We understand the specifics of the complaint relate to [include summary of complaint].

In order to assist us in investigating the circumstances at the time of the complaint and seek a resolution, we would be grateful if you could provide further information. In particular:

- e.g. specific time / location of complaint
- e.g. description of issue

We will pass the details of the complaint to our Project Manager and Construction Site Manager. We will investigate the circumstance at the time of the complaint. Should any evidence of non-compliance with the Project Approval, Health and Safety legislation or other relevant legislation be found, GMR will act accordingly to rectify the situation.

I will provide an update on our investigations within a week and a proposed resolution. If investigations continue beyond a week, I will provide subsequent updates as necessary.

Please don't hesitate to contact me to discuss further.

Kind regards,

[name]

[Position]

On behalf of GMR

[contact detail]



Appendix B Enquiries and complaints register

Ref no.	Complainant details						
	Name	Address	Contact Number	Date/time received	Type of communication (letter, email, etc)	Details of complaint	Outcome of the complaint (resolutions / mitigations)

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A. Greenfield
Signed: for
MINISTER FOR PLANNING
Date: 6 September 2024

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A. Greenfield

**Signed: for
MINISTER FOR PLANNING**

Date: 6 September 2024

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