

SAINT IGNATIUS' COLLEGE RIVERVIEW REDEVELOPMENT STAGE 2

Community Consultation and Complaints Handling Strategy

Prepared for:

EPM Projects

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BASIS OF REPORT

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1 Introduction

1.1 Background

Saint Ignatius' College Riverview Redevelopment Stage 2 sought approval for the development of Stage 2 of an approved Concept Proposal for the Saint Ignatius' College site, involving the construction of a new five-storey building (new Ignis Building) with learning areas, canteen and multi-purpose hall, refurbishment of the existing O'Neil Building, new landscaped areas, and an upgraded courtyard. The proposal would not result in an increase to student numbers (see **Figure 1**). The Proponent, Saint Ignatius' College Riverview Limited, obtained State Significant Development approval for Saint Ignatius' College Riverview Redevelopment Stage 2 (SSD-10424) in October 2021.

This Community Consultation and Complaints Handling Strategy (CCCHS) has been prepared to specifically address Stage 2 works and details how contractors and subcontractors engaged to construct Stage 2 of the Saint Ignatius' College Riverview Redevelopment will engage and interact with relevant stakeholders and the community. The CCCHS integrates with the Construction Environmental Management Plan (CEMP) and associated suite of documents to provide a comprehensive guide and benchmark for the construction process that aligns with the Development Consent conditions applicable to Saint Ignatius' College Riverview Redevelopment Stage 2.

1.2 Purpose

The CCCHS includes the following key aspects:

- Identification of consultation triggers and methods with adjacent landowners and residents, key stakeholders, relevant agencies, and the wider community;
- The tools and actions to be undertaken throughout the construction program to disseminate information through notification of relevant stakeholders;
- Enquiry and Complaint management protocols; and
- Monitoring and feedback mechanisms.

The CCCHS will be updated as the Project progresses to account for variations in the construction program and methodology and modifications to SSD-10424 which materially modify the scope or requirements of the development relevant to communications, engagement, notification, or complaints. The CCCHS will also be updated, if needed, should significant change occur to identified stakeholders and/or stakeholder interests with these articulated through the feedback mechanisms.

SSD-10424 contains the following conditions of relevance to this CCCHS used to benchmark the contents:

- A25 – Access to Information;
- C6 – Community Communication Strategy;
- C9 – Construction Environmental Management Plan.

The details of these conditions are identified within **Table 1** below, along with a cross reference to the relevant section of this CCCHS.

Table 1 Relevant Conditions of Consent

Condition Number	Condition Detail	Report Reference
A25	<p>At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must:</p> <ul style="list-style-type: none"> (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (vii) contact details to enquire about the development or to make a complaint; (viii) a complaints register, updated monthly; 	
C6	<p>No later than two weeks before the commencement of any construction, a Community Communication Strategy must be submitted to the Planning Secretary for approval and approved by the Planning Secretary prior to the commencement of construction or within another timeframe agreed with the Planning Secretary. The Community Communication Strategy must provide mechanisms to facilitate communication between the Applicant, the relevant Council, and the community (including adjoining affected landowners and businesses, and others directly impacted by the development), during the construction of the development and for a minimum of 6 months following the completion of construction.</p> <p>The Community Communication Strategy must:</p> <ul style="list-style-type: none"> (a) identify people to be consulted during the construction phase; (b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the development; (c) provide for the formation of community-based forums, if required, that focus on key environmental management issues for the development; (d) set out procedures and mechanisms: <ul style="list-style-type: none"> (i) through which the community can discuss or provide feedback to the Applicant; (ii) through which the Applicant will respond to enquiries or feedback from the community; and (iii) to resolve any issues and mediate any disputes that may arise in relation to construction and operation of the development, including disputes regarding rectification or compensation. 	This Report
C9	<p>C9. Prior to the commencement of any construction (including internal demolition works), the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary. The CEMP must include, but not be limited to, the following:</p> <ul style="list-style-type: none"> (a) Details of: <ul style="list-style-type: none"> (vii) community consultation and complaints handling as set out in the Community Communication Strategy required by condition C6; 	This Report

1.3 Community Communications and Complaints Handling Strategy Scope

The CCCHS applies to works undertaken by the engaged contractor and all sub-contractors engaged in construction activities for Saint Ignatius' College Riverview Redevelopment Stage 2. This CCCHS outlines the method, triggers and timing of consultation, notification and complaints and queries handling required during the construction of the development and arising from the requirements of the relevant consent conditions outlined in **Table 1**.

1.4 Project Description

SSD-10424 was approved on 25 October 2021, granting approval for Saint Ignatius' College Riverview Limited comprising demolition works, removal of services and construction of new five storey building (Ignis building), internal demolition works and refurbishment of the O'Neil Building, redevelopment of the courtyard area and inclusion of a covered outdoor learning area and associated landscaping upgrade works.

The development as approved under SSD-10424 is outlined in **Table 2** below:

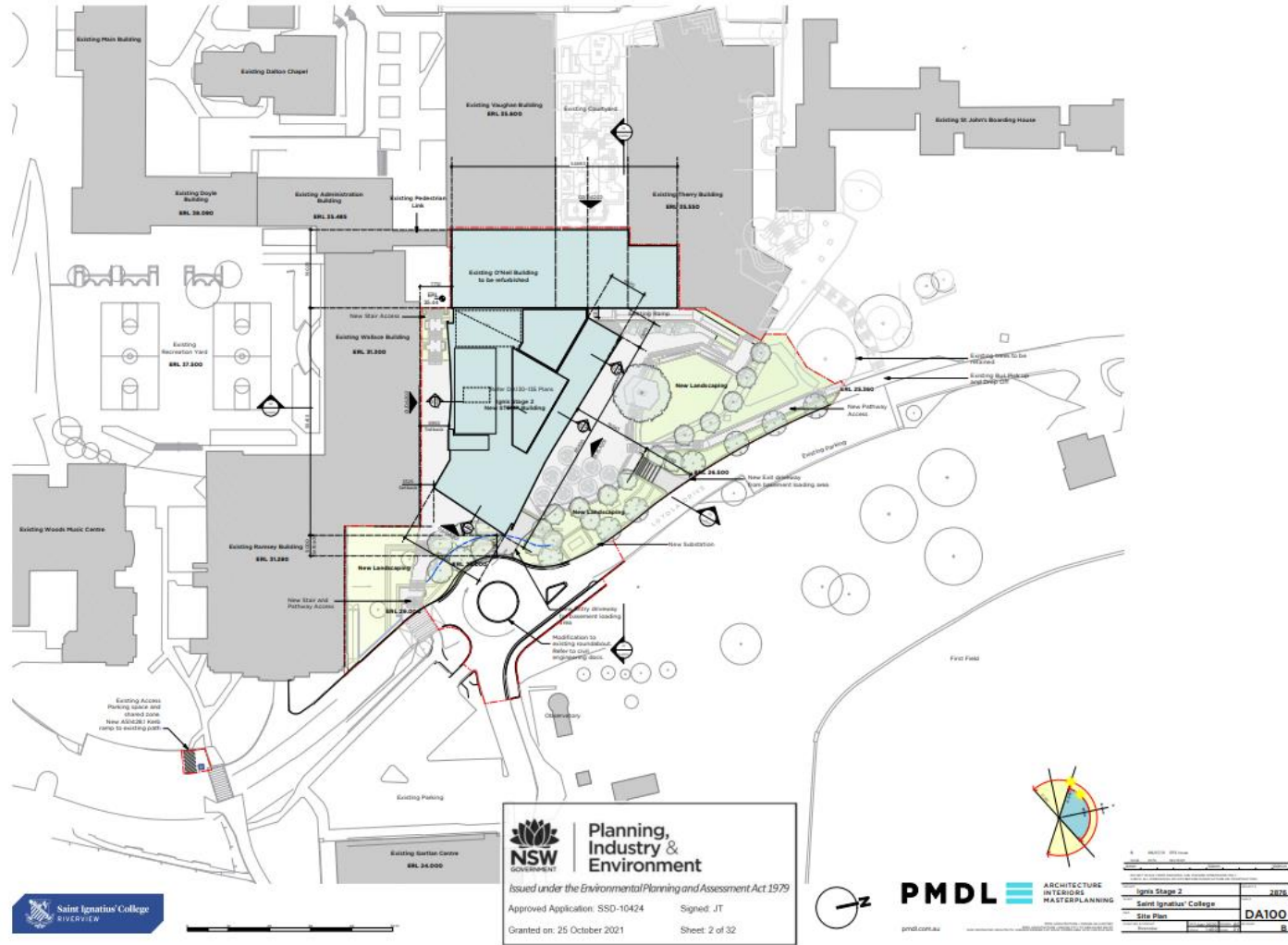
Table 2 Approved Development

Application Number	Development Description
SSD-10424	<p>Stage 2 of the of Saint Ignatius' College Riverview development comprising:</p> <ul style="list-style-type: none">• demolition works, removal of services and construction of new five storey building (Ignis building) to accommodate flexible teaching and learning facilities, six pastoral care areas, staff rooms, multipurpose hall, canteen and basement service level;• internal demolition works and refurbishment of the O'Neil Building• to integrate with the new building;• redevelopment of the courtyard area and inclusion of a covered outdoor learning area; and• associated landscaping upgrade works.

This CCCHS has been prepared to address all works approved under SSD 10424 relevant to Saint Ignatius' College Riverview Redevelopment Stage 2 including site preparation, infrastructure, and built form. All contractors and sub-contractors involved in delivering the Project will be required to comply with the approved CCCHS.

Figure 1 below identifies the Ignis Stage 2 Saint Ignatius College site plan.

Figure 1 Ignis Stage 2 Saint Ignatius College Site Plan



2 Key Stakeholders and Potential Issues

2.1 Key Stakeholders

The key stakeholders likely to require consultation, notification and or likely to raise comment or complaint in the course of the construction of the Project include (but are not limited to):

- Attendees of Saint Ignatius College;
- Adjacent or nearby property owners or occupiers;
- Lane Cove Council (Council);
- NSW Government Architect (GA);
- State Government departments, offices, or agencies, including:
- Environment Protection Authority (EPA)
- Transport for NSW (TfNSW)
- Department of Planning and Environment (DPE), specifically the:
 - Environment, Energy and Science Group (EESG);
 - Heritage Division of the Department of Premier and Cabinet (Heritage NSW);
 - Heritage NSW – Aboriginal Cultural Heritage (ACH);
- Utility and Services Providers, including:
 - Telstra
 - Ausgrid
 - Sydney Water; and
- Other Interested Parties.

2.2 Previous Consultation

The Proponent and their representatives have previously undertaken consultation with agencies, the community, and stakeholders during the development of the Project EIS for SSD-10424.

In response to public notification of SSD-10448, a total of nine (9) submissions were received, eight (8) were from government or public authorities and one (1) was from the general public. In response to the issues raised, the Proponent provided further information relating to the concept approval, building design, amenity impact, visual impact, and traffic management to inform the Response to Submissions Report (Willowtree Planning, 2021).

For more information, refer to the Major Project's webpage at: <https://www.planningportal.nsw.gov.au/major-projects/projects/saint-ignatius-college-riverview-redevelopment-stage-2>.

Consultation has also been undertaken to date with relevant stakeholders to the Project to satisfy Consent Conditions of SSD-10424 and to inform the preparation of required management plans.

2.3 Potential Issues and Strategies

The engaged contractor is committed to ongoing proactive consultation with the community and stakeholders while understanding the importance of addressing potential issues and minimising construction related impacts. **Table 3** outlines potential Project issues that are likely or known to be of interest or concern to the community and stakeholders, as specified in Consent Condition C6(e). The table also details communications related measures and strategies that the Engaged Contractor or Proponent will undertake to manage and mitigate impacts.

Where an incident or non-compliance arises relating to environmental management and beyond the scope of matters relating to consultation, the Saint Ignatius' College Riverview Redevelopment Stage 2 CEMP identifies management and mitigation measures to address those matters, with reference to be made to Section 4.5 outlining Incident and Non-Compliance Response and Handling Procedure.

Saint Ignatius' College will appoint a Contractor for the construction of the Saint Ignatius' College Riverview Redevelopment Stage 2 in November, with the CEMP prepared at this time anticipated to be reviewed and integrated within this CCCHS as required following this appointment to integrate Contractor recommendations.

Table 3 Issue Identification and Mitigation

Potential Issue	Potential Key Impacts	Mitigation Strategy
Traffic	A temporary increase in traffic movements may be experienced associated with the import of fill material, the movement of construction machinery to and from the site, and the movement of workers light vehicles.	The Project CEMP and supporting Construction Traffic and Pedestrian Management Sub-Plan (Condition C11) identify specific mechanisms to manage and mitigate these impacts including the development and implementation of a Driver Code of Conduct to be adhered to by all vehicle operators undertaking works in relation to the Site.
Noise and vibration	Truck, machinery, and light vehicle movements within, to and from the site, along with civil works have potential to result in negative impacts associated with noise, vibration, and dust.	Sensitive receivers and affected stakeholders will be consulted prior to actions likely to generate high levels of noise or vibration in accordance with Section 4 of this CCCHS. Up to date information on current works will be accessible to stakeholders and the wider public on the Project web page. Additionally, should any works be likely to generate impacts beyond those identified within the approval's documentation consultation would be undertaken with the applicable managing agency.

Potential Issue	Potential Key Impacts	Mitigation Strategy
		The Project CEMP, along with the supporting Construction Noise and Vibration Management Sub-Plan (Condition C12) contain specific measures to manage these impacts. These management plans have been informed by commitments contained within the SSD approvals package, EPA standards, and guidelines.
Visual impact and amenity	Visual impacts of earthwork and construction activities, along with potential impacts on the privacy of adjacent sensitive receivers.	Potentially affected receivers would be advised of works with the potential for impact via letter box drop and phone contact (if appropriate) and with these items discussed as they arise via the construction phonenumber, in accordance with Section 4 of this CCCHS. The Project CEMP and supporting Landscape Plan (Condition B5) identifies specific mechanisms to manage and mitigate these impacts.
Flora and Fauna	The Project approval requires minimal impact to native and exotic flora and fauna to facilitate the development, with the associated potential for impacts on safety of immediately adjacent receivers, along with biodiversity and visual amenity.	Potentially affected receivers would be advised of works with the potential for impact via letter box drop and phone contact (if appropriate) and with these items discussed as they arise via the construction phonenumber, in accordance with Section 4 of this CCCHS. The Project CEMP and supporting Landscape Plan (Condition B5) identifies specific mechanisms to manage and mitigate these impacts.
Soil and water	High rainfall events could result in localised flooding. Construction could result in impacts to local water quality, associated with sediment laden runoff.	Surrounding sensitive receivers will be consulted in relation to adjacent works regarding flooding and water quality issues, with these items discussed as they arise via the construction phonenumber, in accordance with Section 4 of this CCCHS. The Project CEMP, along with the supporting Construction Soil and Water Management Sub-Plan (Condition C13) identify specific mechanisms to manage and mitigate these impacts in accordance with relevant Council standards and commitments within the SSD approvals package.
Contamination	There is the potential for encountering contamination during ground disturbance works.	The Project CEMP and supporting unexpected contamination procedure identify specific mechanisms to manage and mitigate these impacts.
Heritage	There is the potential for encountering items of Aboriginal heritage during excavation.	Monitoring of works by appropriately qualified personnel, along with the implementation of an unexpected finds protocol in consultation with Aboriginal stakeholders and Heritage Division of DPE.

Potential Issue	Potential Key Impacts	Mitigation Strategy
		The Project CEMP identifies specific mechanisms to manage and mitigate these impacts.
Misinformation and Misunderstanding	<p>Lack of Project awareness within the wider community may result in complaints being raised by those unaware of the extent of the approval, with these complaints not directed through the appropriate project hotline.</p> <p>Unauthorised release of Project information by the Project team to the media, stakeholders or the community has potential to impact on Project perception in the community.</p>	<p>The CCCHS includes measures at Section 4.3 to provide regular updates in plain language, supported by imagery to stakeholders and the wider community through public and private media.</p> <p>Contact details will be provided on site, the Project web page and in all information issued. Information on Project works, reporting and compliance is to be maintained and updated on the Project website.</p>
Emergency Event	Unforeseen emergency with the potential to impact on the community either directly, or indirectly through out of hours activities that may generate additional traffic or noise.	The CCCHS includes measures at Section 4.4 to provide updates in emergency events, with the Project CEMP identifying specific mechanisms to manage and mitigate these impacts from an environmental management perspective.

3 Communications and Community Liaison Representative

The Proponent for Saint Ignatius' College Riverview Redevelopment Stage 2 has nominated a Communications and Community Liaison Representative (CCLR) for the Project who provides the community and stakeholders with a single point of contact for all aspects of the Project and is responsible for receiving and disseminating information requests and complaints, along with addressing any interface issues. The CCLR will also facilitate property access should it be required.

For the purposes of continuity and the provision of a centralised point of contact, the Saint Ignatius' College Riverview Redevelopment Stage 2 CCLR will cover the Project in its entirety, inclusive of the construction of the Project.

The CCLR is available for contact by local residents and the community at all reasonable times to answer any questions and address any concerns relating to the project. The CCLR will have up-to-date information on:

- Emerging stakeholders;
- Planned construction activities;
- Planned traffic arrangements;
- Current landowner discussions with members of staff;
- Planned community and stakeholder consultation;
- Complaints or enquiries received;
- Duties and accountabilities of staff; and
- Commitments to stakeholders made by the Proponent.

The CCLR is responsible for recording, actioning and providing response to comments, queries or complaints received with relation to the construction of the project and maintains the Complaints Register, including provision of periodic summary reports to the Environmental Representative in accordance with **Section 5.2** of this strategy.

At the time of writing, the contact details for the Saint Ignatius' College Riverview Redevelopment Stage 2 CCLR are as follows:

- Damian Lorenzutta, Capital Works Manager; and
- Peter Ibrahim, EPM Projects.

4 Community and Stakeholder Engagement

4.1 Objectives

The key objectives of the strategy are to meet the requirements of Condition C6 of SSD-10424 and:

- Keep the local community and key stakeholders informed of the progress of works relating to Saint Ignatius' College Riverview Redevelopment Stage 2;
- Ensure that enquires and complaints received from the community or key stakeholders are addressed and responded to in a timely and effective manner;
- Inform relevant parties in advance of potential disturbances and events likely to cause impact;
- Be good students, neighbours, and members of the local community throughout the duration of the Project's lifespan;
- Providing an open two communications channel to allow ongoing, iterative engagement; and
- Seek opportunities for improvement throughout the construction of the Project.

4.2 Conduct

In their communications and consultation with the community and key stakeholders, the Engaged Contractor and their representatives/sub-contractors will comply at all times with the requirements of the *Privacy and Personal Information Protection Act 1998 (NSW)* and the *Privacy Act 1988 (Cth)*.

4.3 Communication, Management and Mitigation Tools

A range of tools and techniques will be used to inform and engage with the community and stakeholders regarding the construction of Saint Ignatius' College Riverview Redevelopment Stage 2. **Table 4** below provides an overview of the mechanisms to be utilised to notify and consult with local community and key stakeholders and measures to mitigate potential issues throughout the development.

Table 4 Communication Management and Mitigation Tools

Tool/ Technique	Description	Person Responsible	Audience	Frequency/timing	Specifications
Consultation Meetings	Meetings held to notify, discuss or consult on matters arising of relevance to community and or key stakeholders. Meetings to be held either face to face or on virtual platform(s)	CCLR and the Proponent	The wider community and key stakeholders.	Meetings to be held on an as needs basis dependant on matters to be discussed and appropriate timing of discussions	Details and matters to be discussed to be tailored to the purpose and aims of the meeting. Record of conversation (informal) or minutes of meeting (formal) to be recorded, retained by the CCLR and provided to all attendees following the meetings. A record of the discussion shall be included in the Complaints Register and actioned as required.
Complaints Register	Recording community and stakeholder interactions (including notification, consultation, queries, comments and complaints), along with associated remedial actions as required.	CCLR	The wider community and key stakeholders.	Project duration	The maintenance of the Complaints Register is required to satisfy the requirements of Condition A25 (a)(viii) of SSD-10448. The register will be continually updated to record community engagement, including information provided by the Proponent, feedback received, and remedial action undertaken where required.
Agency Meetings	Meetings with agencies to discuss matters relevant to their agency	CCLR and/or the Proponent	Relevant Agency	As required.	Meetings will be held as required to address matters relevant to specific agencies including the satisfaction of conditions of consent. These shall be undertaken either directly by the proponent or facilitated by the CCLR at the Proponent's discretion.

Tool/ Technique	Description	Person Responsible	Audience	Frequency/timing	Specifications
Notification Letterbox Drop	Letters would be provided to specific receivers identified as being potentially affected by construction. This may be undertaken in tandem with door knocking.	CCLR	Landowners and occupiers of the immediate area.	As required for the project duration.	Letterbox drop details to be recorded in the Complaints Register. Timing of construction activity to be identified along with relevant contact details.
Email and phone	Where agreed to by the stakeholder and contact details provided, contact is made via email, phone and/or text message to notify or respond to query or complaint	CCLR	The wider community and key stakeholders.	As required for the project duration.	With the stakeholders consent, contact details shall be utilised to provide notification or further contact to respond to query or complaint. Recorded contact details are to kept private and used exclusively for the purpose of consultation on the Project.
On Site Signage	Project information details.	CCLR	Visitors to the site and residents of the immediate area.	Project duration.	Contain key Project contact details including the hotline and web page, along with relevant project and safety information.
Project Information and Complaints Number	Phone number to be contacted should information on the project be required or complaint lodged.	CCLR	The wider community and key stakeholders.	Project duration.	Phone number to be included on site signage, the web page and all project information material. Feedback provided to be incorporated into the Complaints Register and actioned as required.
Staff and Visitor Induction and Training	Project information details.	Site Forman and Management Staff	Staff and visitors to the site.	Project duration.	Key Project safety information, contact details, emergency procedures and site information.

Tool/ Technique	Description	Person Responsible	Audience	Frequency/timing	Specifications
Toolbox and Prestart Meetings	Project information details.	Site Forman and Management Staff	Staff and visitors to the site.	Project duration.	Task specific safety information, emergency procedures and relevant Project updates. All staff and subcontractors to be made aware of external and internal communications procedures
Website	A web page shall be established for the project	The Proponent	The wider community and key stakeholders.	Project duration.	Website address and phone number located on site signage and all Project information material. Web page to provide all details outlined in Section 4.3.1 below.

4.3.1 Project Website

The Proponent will establish a website to be accessible from at least 48 hours prior to commencement of construction until the completion of all works approved under SSD-10424. The following information will be made available on the website and updated monthly or more frequently when necessary and as required by SSD-10424 Condition A25:

- The documents referred to in condition A2 of the consent;
- All current statutory approvals for the development;
- All approved strategies, plans and programs required under the conditions of this consent;
- Regular reporting on the environmental performance of the development in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent;
- A comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
- A summary of the current stage and progress of the development;
- Contact details to enquire about the development or to make a complaint;
- A complaints register, updated monthly;
- Audit reports prepared as part of any independent audit of the development and the Applicant's response to the recommendations in any audit report; and
- Any other matter required by the Planning Secretary.

4.4 Notification Procedure

Where notification is required pursuant to Condition(s) of SSD-10424, notification shall be undertaken within the timeframes outlined within the Consent. Where notification is required due to a potential impact or issue, notification shall be undertaken in accordance with **Table 5** below.

Saint Ignatius' College will appoint a Contractor for the construction of the Saint Ignatius' College Riverview Redevelopment Stage 2 in November, with the CEMP prepared at this time anticipated to be reviewed and integrated within this CCCHS as required following this appointment to integrate Contractor recommendations.

Table 5 Notification of Potential Impact or Issue

Potential Impact or Issue	Method of Contact/Consultation	Timeframe
Outside of hours work	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours	Before undertaking the activities or as soon as is practical afterwards
High noise generating work	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours	No less than 24 hours prior to the activity
Vibration intensive activity	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours	No less than 24 hours prior to the activity
Traffic management disruption	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours Variable Message Signs	No less than 24 hours prior to the activity

Potential Impact or Issue	Method of Contact/Consultation	Timeframe
Respite offerings	Email or phone calls will be undertaken to determine whether respite is required and appropriate scheduling and duration for respite periods	No less than 24 hours prior to the activity
Emergency Event	Email, Text Message or Letterbox drop – notifying of expected commencement, duration and affected hours	As soon as possible

4.5 Complaints Procedure

The Engaged Contractor is committed to the timely and effective management of enquiries and complaints relating to construction activities for the Project. To this end, the following complaints procedure will be adhered to, enabling the receipt and recording of enquiries and complaints, along with the methods of response and resolution of issues raised.

The complaints handling procedure outlined below and illustrated in **Figure 2**.

4.5.1 Receiving and Recording Enquiries and Complaints

The Proponent will establish a Project email address and nominate a phone number for the receipt of enquiries and complaints relating to the development. The email account will be regularly monitored to receive and respond to customer feedback and enquiries. The phone number will be available for contact from the commencement of works. The CCLR will manage the phonenumber from the commencement of the project until the completion of works. Where calls are received during hours of construction work (including out of hours works) all calls will be answered by the CCLR. Where calls are received outside of hours of construction works the caller will be invited to leave a message. All approaches from the community and stakeholders will be registered in the project's Complaints Register. The facilities established for receiving enquiries and complaints about the project during construction are shown in **Table 6**.

Table 6 Enquires and Complaints Facilities

Facility	Purpose	Detail
Phone number	A contact phone number and associated contact name (the CCLR) for questions/enquiries and the lodgement of complaints relating to the development.	Damian Lorenzutta - +61 2 9882 8175 Peter Ibrahim - +61 2 9452 8300
Email Address	An email address for questions/enquiries and the lodgement of complaints relating to the development.	Damian Lorenzutta - dlorenzutta@riverview.nsw.edu.au Peter Ibrahim - pibrahim@epmprojects.com.au
In person verbal	Verbal enquiries and complaints can be made formally during meetings or may be made informally where staff interact with members of the public in informal settings.	Where enquiry or complaint is made face to face to persons other than the CCLR, staff will immediately notify the Contractor's Project Manager who will then contact the CCLR. Record of the conversation (including the recording of contact details with consent) will be made by the staff member and provided to the CCLR immediately

The Proponent has established a Complaints Register to record all complaints and enquiries received by the above means. The Complaints Register will be maintained on a regular basis. The Complaints Register shall include the following details for all complaints or enquiries received:

- Date and time of complaint or enquiry;
- Method by which the complaint or enquiry was made;
- Name, address, contact telephone number of complainant (if no such details were provided, a note to that effect);
- Nature of complaint or enquiry;
- Action taken in response including follow up contact with the complainant;
- Any monitoring to confirm that the complaint or enquiry has been satisfactorily resolved; and
- If no action was taken, the reasons why no action was taken by you.

An example of the Complaints Register is included at **Appendix A**.

4.5.2 Responding to and Resolving Enquiries and Complaints

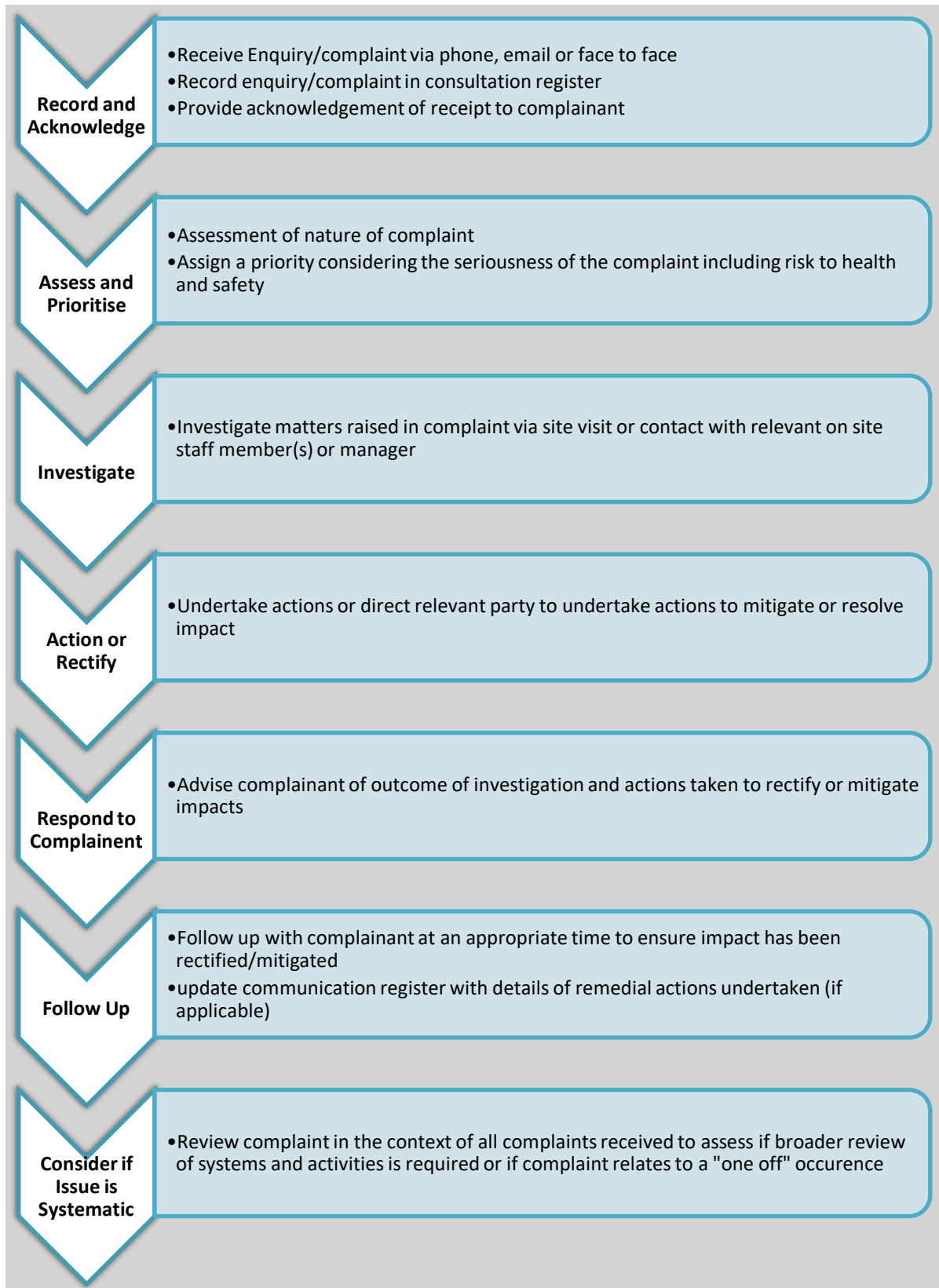
Where a complaint or enquiry is received the CCLR will attempt to provide an immediate response, if possible, via phone or email. Where a complaint or enquiry cannot be responded to immediately the CCLR will assess and prioritise the submission and provide the complainant or enquirer with a follow up verbal response on what action is proposed within two hours during construction works (including night and weekend works) and 24 hours at other times. Where a complaint or enquiry cannot be resolved by the initial or follow-up verbal response, a written response will be provided to the complainant or enquirer within ten days.

In the event of a complaint, the CCLR will assess whether the complaint is founded or unfounded and if necessary, delegate the resolution of the issue to the project manager for action or to the relevant project engineer. The CCLR will oversee the rectification of the issue and respond to the complainant once the issue has been resolved.

In the event of an enquiry, the CCLR will endeavour to provide an immediate response where they are in possession of the relevant information. Where more specific or detailed information is required, the CCLR will liaise with the project manager or relevant project engineer to obtain the information required to respond to the enquiry and provide this information to the enquiring party once in hand.

Where the above protocol is unsuccessful in resolving complaints, mediation may be undertaken at the discretion of the Proponent to facilitate negotiation between affected parties. This shall be performed with the assistance of the ER and potentially via an independent person (mediator) appointed by the Proponent as required. A summary of complaints and enquiries will be provided on a monthly basis with records made publicly available.

Figure 2 Complaints Handling Procedure



4.5.3 Unreasonable Complainant Conduct

The NSW Ombudsman provides guidelines which define unreasonable complaint conduct as:

“any behaviour by a current or former complainant which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to a complaint.”

Whilst it is not envisioned that the project will attract complainants that exhibit this behaviour, where a complainant is seen to potentially have a negative impact on the CCLR or Project team’s health, safety, resourcing, or equity of service, The Proponent shall adhere to the procedures and practices outlined within the NSW Ombudsman’s *“Managing Unreasonable Complainant Conduct Practice Manual 2nd Edition”*.

4.6 Contingency Management Plan

A contingency management plan has been developed to outline the management of unpredicted impacts and their consequences. Details of these events, their severity, and response are detailed in **Table 7** below:

Table 7 Contingency Management Plan

Key Element	Trigger/ Response	Condition Green	Condition Amber	Condition Red
Submission	Trigger	General feedback/comment (no complaint or query).	Enquiry made by formal or informal channels.	Complaint made by formal or informal channels.
	Response	Acknowledge receipt and record in Complaints Register. No further response required.	Acknowledge receipt and record in Complaints Register. Direct enquiry to relevant person for actioning and response within 5 days.	Acknowledge receipt and record in Complaints Register. Respond to complaint immediately, if possible, if not direct enquiry to relevant person for actioning and provide complainant with a follow up verbal response on what action is proposed within two hours during construction works (including night and weekend works) and 24 hours at other times.
Media	Trigger	Positive story in print, online, radio or television.	Neutral or advisory story in print, online, radio or television.	Negative story in print, online, radio or television.
	Response	Record in Complaints Register and advise the proponent media/marketing team. No further response required.	Record in Complaints Register and advise the proponent media/marketing team. No further response required.	Record in Complaints Register and advise the proponent Project Team for further action and response. Contact relevant person for actioning and response within 48 hours

Key Element	Trigger/ Response	Condition Green	Condition Amber	Condition Red
Unscheduled Event	Trigger	Event occurring outside of plan or schedule without impact or potential impact.	Event occurring outside of plan or schedule with minor impact or potential impact.	Event occurring outside of plan or schedule with major impact or potential impact.
	Response	No response required. Identify opportunities for improvement to manage potential future events.	Contact relevant person for actioning and response within 48 hours. Acknowledge in Complaints Register. Identify opportunities for improvement to manage potential future events.	Contact relevant person for actioning and response immediately. Acknowledge in Complaints Register. Identify opportunities for improvement to manage potential future events.
Political Interest	Trigger	General or non-specific enquiry by Local, State or Federal political representative.	Enquiry or complaint relating to minor issue by Local, State or Federal political representative.	Enquiry or complaint relating to major issue by Local, State or Federal political representative.
	Response	CCLR in conjunction with The Proponent Project Team to prepare and provide response or assign response task to relevant staff member for comment. Record in Complaints Register.	CCLR in conjunction with the proponent Project Team to prepare and provide response within 48 hours. Record in Complaints Register.	CCLR in conjunction with the proponent Project Team to prepare and provide response within 24 hours. Record in Complaints Register.

5 Monitoring, Reporting and Evaluation

Monitoring, reporting, and evaluation will be undertaken to measure the effectiveness of community consultation, stakeholder engagement and responses to complaints and enquiries. Opportunities for improvement will be sought on a continuous basis, with an annual review of the CCCHS undertaken to formalise these incremental improvements.

5.1 Monitoring

The performance of this strategy will be monitored monthly based upon an assessment of the following data:

- Total number of monthly complaints;
- Review of number of monthly complaints relating to lack of consultation/misinformation/confusion;
- Review of number of monthly enquiries relating to information previously disseminated to the community through other channels;
- Monthly review of enquiries or complaints of a similar nature or theme indicative of underlying systematic issues with the project or communication strategy; and
- Response timeframes, including initial acknowledgement and the response to enquiries or remediation of issue(s).

The parameters of monitoring and performance criteria are outlined in **Table 8** below.

Table 8 Summary of Monitoring Data

Monitoring Parameter	Rationale	Performance Criteria	Monitoring Frequency
Total number of complaints	The number of complaints received in total is indicative of the community's satisfaction with the project.	A reduction in number of complaints, baseline determined by number of complaints received in preceding months.	Monthly
Number of complaints relating to lack of consultation/misinformation/confusion	Number of complaints relating to lack of consultation/ misinformation/ confusion is indicative of the effectiveness and clarity of communication tools utilized.	A reduction in number of complaints, baseline determined by number of complaints received in preceding month.	Monthly
Number of enquiries relating to information previously disseminated	Number of enquiries relating to information previously disseminated is indicative to the effectiveness of the delivery of information.	A reduction in number of enquiries, baseline determined by number of enquiries received in preceding month.	Monthly
Number of complaints/enquiries within defined categories based on theme or subject	A large number of complaints or enquiries relating to a single issue may be indicative of a systematic issue to be addressed as a priority.	A reduction in number of complaints, baseline determined by number of complaints received in preceding month.	Monthly

Monitoring Parameter	Rationale	Performance Criteria	Monitoring Frequency
Response timeframes	Response to enquiries and complaints should be timely to ensure effective responsiveness and rectification of issues and to encourage trust within the community.	Enquiries and complaints acknowledged within 48 hours. Urgent enquiries and complaints responded to within 48 hours of receipt, non-urgent enquiries and complaints responded to within 5 days.	Monthly

5.2 Reporting

As per Condition A25 of SSD-10424, at least 48 hours before the commencement of construction until the completion of all works under the consent, or such other time as agreed by the Planning Secretary, the Applicant must make the following information and documents (as they are obtained or approved) publicly available on its website and keep such information up to date, to the satisfaction of the Planning Secretary, and publicly available for 12 months after the commencement of operations:

- Contact details to enquire about the development or to make a complaint; and
- A complaints register, updated monthly.

5.3 Evaluation and Review

Review of this strategy shall be undertaken in accordance with the provisions of the Project CEMP.

Where performance criteria are not being satisfied, review of this strategy and its implementation will be undertaken by the CCLR and changes to the strategy may be made to rectify the short fall. Where systematic issues are identified associated with construction activities, the project manager will be advised and immediate rectification of the issue will be requested.

This strategy will be reviewed in accordance with Condition A32 of SSD-10424 and where necessary updated or revised in accordance with Condition A33 of SSD-10424.

6 References

NSW Ombudsman (2012) Managing Unreasonable Complainant Conduct Practice Manual 2nd Edition

Willowtree Planning (2020) Environmental Impact Statement New Ignis Stage 2 STEMP Building Project Development

Willowtree Planning (2021) Response to Submissions - SSDA 10424

Appendix A:

Complaints Register

Date	Time	Responsible Party	In/Out	Initial Communication Method/Tool	Contact Name/ Organisation	Contact Details	Documentation Location (if applicable)	Communication Type: Complaint/ Enquiry/ Communication	Summary of Issues/ Details	Action Taken	Further Action/ Monitoring to Confirm Resolution

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