



## EXTERNAL COMPLAINT HANDLING POLICY

(SEPTEMBER 2007)

### BACKGROUND, FUNCTIONS AND POWERS OF THE GHRRA

The NSW Greyhound and Harness Racing Regulatory Authority ("the GHRRA") is a statutory body established under the *Greyhound and Harness Racing Administration Act 2004* (NSW). The primary functions of the GHRRA relate to the regulation of Greyhound and Harness Racing in New South Wales. The GHRRA's powers include:

- In accordance with the rules made in relation to greyhound racing, to register, or refuse to register any greyhound, or any owner, trainer or bookmaker or other person associated with greyhound racing.
- In accordance with the rules made in relation to harness racing, to register, or refuse to register any harness racing horse, or any owner, trainer or driver or bookmaker or other person associated with harness racing.
- In accordance with the rules made in relation to greyhound racing:
  - to cancel the registration of any greyhound racing club, trial track, greyhound or any owner, trainer or bookmaker or other person associated with greyhound racing;
  - to disqualify any owner, trainer or bookmaker or other person associated with greyhound racing;
  - to impose fines on any greyhound racing club, or on any owner, trainer or bookmaker or other person associated with greyhound racing.
- In accordance with the rules made in relation to harness racing:
  - to cancel the registration of any harness racing club, trial track, harness racing horse or any owner, trainer or driver of harness racing horses , or bookmaker or other person associated with harness racing;

- to disqualify any owner, trainer or driver of harness racing horses or bookmaker or other person associated with harness racing;
- to impose fines on any harness racing club, or on any owner, trainer or driver of harness horses or bookmaker or other person associated with harness racing.

### **PURPOSE OF THIS POLICY**

The purpose of this policy is to affirm and support the right of members of the public to lodge a complaint with the GHRRA and have the complaint dealt with fairly, consistently and confidentially.

### **WHAT IS A COMPLAINT?**

A complaint is defined as an expression of dissatisfaction with the GHRRA's policies, procedures, fees, employees or quality of service provided.

Complaints can be lodged in person, by phone, email or in writing. All complaints will be given equal priority.

Anonymous complaints will only be investigated if the severity of the complaint warrants it and if sufficient information has been provided to warrant an investigation.

### **WHAT DOES NOT CONSTITUTE A COMPLAINT?**

It is also important to define what does not constitute a complaint. The following will not be considered complaints:

- Requests for services (unless the request is a second request as there was no satisfactory response to the first)
- Requests for information or explanation of policies or procedures
- Lodging of Appeals to the Greyhound and Harness Racing Appeals Tribunal.

**COMPLAINT HANDLING PROCEDURES**

The GHRRA’s Complaint Handling Procedures comprise three stages:

<b>Frontline Complaint Handling</b>	<b>Internal Review</b>	<b>External Review</b>
<p>The Employee who receives the complaint is to deal with it at the first instance.</p> <p>The Employee may receive the complaint in person, by telephone, by email or be referred a written complaint by their Reporting Manager.</p> <p>Complaints that cannot be resolved by Frontline Employees and, including those raising more serious concerns, are to be automatically referred to the next stage.</p>	<p>A Reporting Manager is to:</p> <ul style="list-style-type: none"><li>• review any complaints that could not be resolved at the Frontline stage, and</li><li>• refer any serious complaints to the Complaint Handling Officer</li></ul> <p>The Complaint Handling Officer will deal directly with serious complaints and where appropriate, with approval from the Complainant, refer the complaint for External Review</p>	<p>The Complaint Handling Officer may advise the complainant to complain to another agency or to seek resolution of their concerns using other avenues of appeal or review (eg legal system).</p>

All complaints received by the GHRRA will be dealt with according to these Complaint Handling Procedures.

**STAGE 1 - Frontline Complaint Handling**

GHRRA Frontline Customer Service Employees will attempt to resolve a customer complaint in the first instance.

A complaint should be acknowledged either verbally or in writing depending on the delivery of the complaint. Where a complaint is received and acknowledged in writing, a copy of the documentation will be provided to the Complaint Handling Officer.

All complaints will be recorded in the Complaints Register maintained by the Complaint Handling Officer.

Should the employee be unable to resolve the complaint or if the complainant is still dissatisfied, the complaint will be referred to the Divisional Manager.

## **STAGE 2 – Internal Review**

Each GHRRA Divisional Manager has the responsibility for dealing with complaints which cannot be addressed by Frontline Employees.

The Divisional Manager will contact the complainant either by phone, email, or in writing to advise the complainant that they are acting on their complaint and to obtain further details if necessary.

Copies of any documentation relating to the complaint should be provided to the Complaint Handling Officer.

Should the complainant still remain dissatisfied of if the complaint is of a serious nature, the complaint should be referred to the Complaint Handling Officer.

The GHRRA Complaint Handling Officer is the Deputy Chief Executive.

The Complaint Handling Officer can be contacted as follows:

✉	Mail:	PO Box 358, Bankstown, NSW, 1885 (please place correspondence in sealed envelope marked ' <i>Private and Confidential</i> ')
✉	Email:	issues@ghrra.nsw.gov.au
☎	Telephone:	(02) 9722 6600
☎	Facsimile:	(02) 9722 6690

The Complaint Handling Officer will review or investigate the complaint. Results of the review or investigation will be communicated to the complainant.

Where the complaint is made against a GHRRA employee, the employee will be notified verbally of the complaint in a timely manner and details of the complaint provided in writing to the employee. Results of the review or investigation will be communicated to the employee.

An employee who is the subject of a complaint will not be involved in any investigation relating to the complaint.

The Complaint Handling Officer may decide, with agreement by the complainant, to refer to the complaint for External Review.

## **STAGE 3 – External Review**

Complaints of a serious nature or complaints that cannot be handled by the GHRRA internally may be referred to an external investigation agency.

Should the complainant not be satisfied with the handling of the complaint by the GHRRA, the complainant may refer the complaint to:

- **The Office of the Minister for Gaming and Racing**

- **NSW Ombudsman** – for matters of administration and FOI
- **Independent Commission Against Corruption** – for corrupt conduct
- **Anti-Discrimination Board (NSW)** – for matters of discrimination, harassment or bullying
- **Privacy NSW** – for breach of privacy matters
- **NSW Police** – for criminal matters

### **CONCILIATION**

Conciliation is voluntary and with the agreement of the parties concerned. The purpose of conciliation is to bring the parties together to promote discussion, negotiation and settlement of the complaint. In some instances, the complaint may be over a relatively minor matter but may have the potential to become serious if allowed to escalate. Conciliation, at an early stage, may prove successful in preventing such escalations.

Where Managers perceive this potential for escalation they should contact the Complaint Handling Officer who will ensure the parties to the complaint are aware that conciliation is voluntary and subject to their agreement.

The Complaint Handling Officer will normally act as the conciliator.

Conciliation should cease if the following occurs:

- disciplinary action is a possible outcome;
- the complaint becomes complex;
- if it becomes obvious that the outcome sought by the complainant cannot be provided by the conciliator;
- if the facts are in dispute and require investigation;
- if questions of precedent for the Authority become involved.

### **DIFFICULT COMPLAINANTS**

Should a complainant who lodges a complaint in person or by telephone become angry, aggressive or threatening in any way, the complainant should be referred to the Employee's Reporting Manager in the first instance. Where the Reporting Manager is unavailable, the complainant should be referred to the Complaint Handling Officer.

## **RECORDING OF COMPLAINTS**

All complaints received by the GHRRA will be recorded in the GHRRA's Complaints Register.

Details of complaints and actions taken to resolve the issues will be recorded in accordance with the Complaints Handling Procedures.

## **CONFIDENTIALITY**

The GHRRA has privacy obligations towards all parties to a complaint and requires that confidentiality is respected by all parties throughout the complaints handling process.

**The complainant, the respondent, and any third party to a complaint must observe strict confidentiality at all times.**

Any disciplinary action taken with respect to a GHRRA Employee which may result following investigation of a complaint will remain confidential within the GHRRA between the affected Employee and Senior Management.

## **COMPLAINTS ABOUT INDUSTRY PARTICIPANTS**

Any complaint lodged with respect to an Industry Participant will be investigated by GHRRA Stewards and may be subject to a Stewards' Inquiry.

**JOHN F COUGHLAN**  
Chief Executive Officer

September 2007