



16 December 2022

By EMAIL

[REDACTED]

Dear [REDACTED]

Freedom of Information Application – Decision

I refer to your application under section 30 of the *Freedom of Information Act 2016 (Act)* received by Icon Water on 25 November 2022, in which you sought access to the following information:

In reference to the Utilities (Consumer Protection Code) Determination 2020 (Code):

- *Icon Water's standard operating procedures in regards to Schedule 1 and outlined in Table 1.1 of the Code; and*
- *Icon Water's reports, as provided under section 4.1 of the Code since 2018.*

I am the Information Officer appointed under section 18 of the Act to deal with access applications made under Part 5 of the Act.

Icon Water is required to provide a decision on your access application by **23 December 2022**.

Decision on Access

1. Standard Operating Procedures

Icon Water did not identify any standard operating procedures for Schedule 1, Table 1.1 of the Code. However, I have interpreted your application as seeking access to policies or procedures that address the thresholds for the Guaranteed Service Levels (GSL-W1 to GSL-W6) in the Code. The following policies and procedures were identified as relevant:

- Policy PO6: Customer Management;
- Icon Water Complaint Policy;
- Icon Water Customer Charter;
- Procedure PR06.03: Customer Service and Complaints.

Icon Water's Customer Management Policy, Complaint Policy and Customer Charter are published at www.iconwater.com.au – I have included the hyperlink to these documents above.

2. ICRC Compliance Reports

Icon Water publishes reports made to the Independent Competition and Regulatory Commission (**ICRC**) under clause 4.1 of the Code at <https://www.iconwater.com.au/About-Us/Our-pricing/Reports-submissions.aspx>. Relevant reports for the period 2018 to 2022 are publicly available at www.iconwater.com.au.

Online publishing – disclosure log

Under section 28 of the Act, Icon Water maintains an online record of access applications called a disclosure log. Your original access application, my decision and documents released to you in response to your access application will be published in the Icon Water disclosure log after **11 January 2023**.

You may view the Icon Water's disclosure log at <http://www.iconwater.com.au/About/Contact-Us/Freedom-of-Information.aspx>.

Ombudsman review

My decision on your access request is a reviewable decision as identified in Schedule 3 of the Act. You have the right to seek Ombudsman review of this outcome under section 73 of the Act within 20 working days from the day that my decision is published in Icon Water's disclosure log, or a longer period allowed by the Ombudsman.

If you wish to request a review of my decision you may write to the Ombudsman at:

The ACT Ombudsman
GPO Box 442
CANBERRA ACT 2601
Via email: ombudsman@ombudsman.gov.au

ACT Civil and Administrative Tribunal (ACAT) review

Under section 84 of the Act, if a decision is made under section 82(1) on an Ombudsman review, you may apply to the ACAT for review of the Ombudsman decision.

Further information may be obtained from the ACAT at:

ACT Civil and Administrative Tribunal
Level 4, 1 Moore St
GPO Box 370
Canberra City ACT 2601
Telephone: (02) 6207 1740
<http://www.acat.act.gov.au/>

If you have any queries concerning the processing of your request, or would like further information, please contact me iconwater.secretariat@iconwater.com.au.

Yours faithfully

Alison Pratt

Alison Pratt
Information Officer

Customer service and complaints



Responsible Executive: General Manager Customer Engagement

Version date: 23 November 2021 **Version:** 2 **Next review date:** 23 November 2024

1. Background

- 1.1.1 Icon Water and its personnel are committed and required to further Icon Water’s commitment to:
 - a. providing prompt, friendly, courteous and efficient customer service
 - b. welcoming feedback on our service, our processes and our people
 - c. providing information about our products and services to enable customers to make informed decisions that best suit their needs
 - d. providing customers with guidance on the efficient use of water.
- 1.1.2 Complaints to Icon Water may be made either:
 - a. via Icon Water’s main contact number, in which case such complaints may be handled by ActewAGL Retail and Faults & Emergencies on Icon Water’s behalf, or referred to Icon Water
 - b. directly to Icon Water.

2. Scope

- 2.1.1 This procedure applies to all Icon Water personnel undertaking customer service and complaints activities.

3. Purpose

3.1 Purpose of this procedure

- 3.1.1 This procedure describes the steps relating to complaints made directly to Icon Water.

3.2 Business risk identification

- 3.2.1 (RSK – 1717) Failure to provide a timely and consistent response to customer or other complaints or enquiries means that Icon Water does not meet consumer protection code obligations, Australian Standards for customer satisfaction, and/or internal performance targets, resulting in a moderate legal/compliance breach.

4. Procedure

4.1 Entry criteria

- 4.1.1 Primary conditions or requirements, which must be met before initiating the process are:
 - a. complaint is received from customer
 - b. acknowledgement is required
 - c. meaningful response is required

Table 1: Detailed procedure

Step/description	Responsibility	Timing
4.2 First contact		

Step/description	Responsibility	Timing
4.2.1 Receive complaints regarding Icon Water: <ol style="list-style-type: none"> a. in person (either to Field Services staff or to any other Icon Water staff member) b. via telephone c. via mail d. some other means. 	Customer Services Liaison	When a complaint is received
4.2.2 Clearly distinguish between a service request, an inquiry and a complaint. <ol style="list-style-type: none"> a. If the consumer identifies their comment as a complaint, it is a complaint. b. If the consumer has not made it clear whether their comment is a complaint, ask (if the comment is made in person or by telephone) or use your judgment (if it is in writing). 	Customer Services Liaison	When a complaint is received
4.2.3 Refer the complaint to the appropriate complaints officer if a caller wishes to lodge a complaint, or Icon Water receives correspondence which contains a complaint. Details of complaints officers can be obtained from: <ol style="list-style-type: none"> a. Team Leader Customer Services – ext. 6081 b. Corporate – Company Secretary ext. 6145 	Customer Services Liaison	When a complaint is received
4.3 Recording the complaint		
4.3.1 Complaints must be recorded accurately in the customer management system (Satisfy) and promptly in accordance with: <ol style="list-style-type: none"> a. branch or group procedures b. triage guide, and c. any applicable laws. 	Customer Services Liaison	When a complaint is received
4.4 Responding to complaints		
4.4.1 Acknowledge the complaint immediately or as soon as practicably possible within 48 hours: <ol style="list-style-type: none"> a. by telephone or b. in writing. <p>Where a complaint is received via a telephone conversation or in personal discussion, it should be recorded as having been acknowledged immediately. Water Quality complaints emailed via Faults can be deemed as acknowledged.</p>	Customer Services Liaison	When a complaint is received
4.4.2 Provide a meaningful response within 20 business days. A meaningful response ideally will be action that resolves the complaint. However, it may also be a response that:	Customer Services Liaison	When a complaint is received

Step/description	Responsibility	Timing
<ul style="list-style-type: none"> a. confirms the cause of the issue/s if known and b. advises what corrective action is being taken to rectify the issue/s and c. indicates the likely time by which the issue/s will be finalised. 		
<p>4.4.3 Give the meaningful response in writing, either via email or paper mail. If the complainant indicates that a telephoned response is sufficient without a letter from Icon Water, then no letter needs to be written.</p> <p>Note: A vague statement that Icon Water will review a problem at some time in the future does not qualify as a meaningful response.</p>	Customer Services Liaison	When a complaint is received
4.5 Difficult complainants		
<p>4.5.1 Do not endure insulting, aggressive, vulgar or abusive telephone calls or meetings with persons wishing to complain. Likewise, do not insult, be aggressive, vulgar or abusive when receiving or responding to complaints.</p>	Customer Services Liaison	When a complaint is received
<p>4.5.2 Never write defamatory, insulting or offensive comments about a complainant. Written records may be subpoenaed by a court or possibly accessed under <i>Freedom of Information</i> legislation or <i>Privacy</i> legislation. Conversations may become the subject of cross-examination in a court. An inappropriate comment in Icon Water's possession could make both the writer of the comment, and Icon Water, financially liable or injure Icon Water's reputation.</p>	Customer Services Liaison	When a complaint is received
4.6 Defamatory material and allegations of fraud		
<p>4.6.1 Refer any complaint that:</p> <ul style="list-style-type: none"> a. alleges fraud or wrongful behaviour b. is abusive, defamatory, insulting of Icon Water staff or c. is otherwise of a sensitive nature <p>to the relevant Executive Member and the Office of the Company Secretary.</p>	Customer Services Liaison	When a complaint is received
4.7 Privacy		
<p>4.7.1 Icon Water and Icon Water personnel must:</p> <ul style="list-style-type: none"> a. Respect customers' privacy and treat all personal information in strict confidence and in accordance with Icon Water's Privacy policies and procedures and all relevant legislation b. Protect customer information from misuse, loss and unauthorised access and c. Not use customer details for purposes other 	All Icon Water employees	At all times

Step/description	Responsibility	Timing
than Icon Water business-related activities.		

4.8 Exit criteria

4.8.1 Primary conditions or requirements, which must be met before completing the process are:

- a. complaint is acknowledged within 48 hours and a meaningful response provided within 20 business days.

4.9 Resulting records and storage

Name of the record	Location of the record
Complaint	Satisfy

4.10 Procedure monitoring

4.10.1 The effectiveness of this procedure will be monitored by the Customer Services team through an annual review of:

- a. the extent to which the purpose (at 3.1.1) is achieved
- b. whether the related risk (at 3.2) is adequately controlled
- c. user feedback.

5. References

5.1 IMS policy

5.1.1 [PO6 Customer management](#)

5.2 IMS work instruction

5.2.1 [WI06.03.11 Complaint handling general](#)

5.3 Other references

Consumer Protection Code 2012

[Icon Water Privacy Policy](#)

6. Definitions and abbreviations

Term	Definition
Worker	(As defined in the ACT Work Health and Safety Act 2011.) A person/s who carries out work in any capacity including an employee, contractor, employees of sub-contractors, labour hire workers, apprentices, students or volunteers.