



COMPLAINTS MANAGEMENT POLICY

1. Purpose

This Policy establishes a structured and compliant framework for the management of complaints made by members, employers, beneficiaries and other stakeholders of the Contracting Industry Redundancy Trust ("the Trust").

The Policy ensures compliance with:

- Corporations Act 2001 (Cth)
 - Australian Financial Services (AFS) licence obligations (including s912A)
 - ASIC Regulatory Guide 271 – Internal Dispute Resolution
 - Employee entitlement scheme regulatory requirements
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2. Scope

This Policy applies to:

- All complaints relating to:
 - Membership entitlements
 - Employer contributions
 - Benefit claims
 - Administration of the Trust
 - Investments (if applicable)
 - All trustees, officers, employees and service providers
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3. Definition of Complaint

A complaint is defined as:

An expression of dissatisfaction made to or about the Trust, its services, staff or handling of a complaint, where a response or resolution is explicitly or implicitly expected.

4. Guiding Principles

The Trust will manage complaints in accordance with the following principles:

- Fairness and objectivity
 - Accessibility (free and easy to lodge)
 - Timeliness
 - Transparency
 - Accountability
 - Continuous improvement
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5. Internal Dispute Resolution (IDR)

The Trust maintains an Internal Dispute Resolution (IDR) framework that:

- Complies with ASIC RG 271
 - Is free of charge
 - Is accessible to all complainants
 - Is documented and consistently applied
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6. Lodgement of Complaints

If unsatisfied with the services provided by CIRT or there is disagreement with a decision of that has been made, please contact CIRT Administration.

Complaints may be lodged via:

- Email – enquiries@cirt.com.au
- Telephone – CIRT Administration on 1300 200 123
- Member or Employer Portal
- Mail – GPO Box 701 Brisbane Qld 4001

The Trust will provide reasonable assistance to complainants where required.

7. Acknowledgement

- Complaints will be acknowledged within one (1) business day or as soon as practicable
 - Acknowledgement will include:
 - Reference number
 - Expected timeframes
 - Contact details
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8. Assessment and Investigation

At CIRT we take your complaints seriously. We also see them as a way to make our services better.

The assessment and investigation process will involve:

- Assessing complaints objectively on their merits
- Allocating appropriately trained personnel
- Investigating in a fair, unbiased and timely manner
- Considering all relevant information

Conflicts of interest will be identified and managed appropriately.

We'll look into your complaint carefully. This might mean:

- Gathering any important documents
- Talking to staff who know what happened
- Reviewing information we've shared with you
- Looking at the rules and laws that apply.

When we've finished our investigation, we'll send you a letter explaining what we found and what we've decided.

9. Timeframes

The Trust will comply with the following maximum timeframes:

- Standard complaints: 30 calendar days
- Complex matters (if applicable): up to 45 calendar days
- Where delays occur, complainants will be informed of:
 - Reasons for delay
 - Their right to escalate externally

If we can't fix the problem straight away, we'll contact you within 5 business days, either by phone or in writing.



10. IDR Response

The final response will include:

- Outcome of the complaint
- Reasons for the decision
- Details of any remedy
- Information on escalation options

11. External Dispute Resolution

If a complaint is not resolved or the complainant remains unsatisfied with CIRT's response, the complainant may escalate to the Australian Financial Complaints Authority (AFCA).

AFCA provides free, fair and independent financial services complaint resolution assistance to complainants.

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001.

12. Complaints Register

The Trust will maintain a complaints register capturing:

- Complaint details
- Dates and timeframes
- Outcomes
- Actions taken

Records will be retained in accordance with legal and regulatory requirements.

13. Systemic Issues

The Trust will:

- Monitor complaint trends
- Identify systemic issues
- Escalate material issues to senior management and the Board
- Implement corrective actions

14. Governance

14.1 Board Responsibilities

The Board of Trustees is responsible for:

- Oversight of complaints management
- Ensuring adequate systems and resources
- Reviewing complaint reports and trends



14.2 Complaints Officer

The Complaints Officer is responsible for:

- Managing the IDR process
 - Maintaining the complaints register
 - Reporting to the Board
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15. Training

All relevant personnel will receive training on:

- Complaints handling procedures
 - Regulatory obligations
 - Fair treatment of members
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16. Accessibility

The Trust will ensure:

- The complaints process is easy to understand
 - Information is publicly available
 - Assistance is provided where needed
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17. Continuous Improvement

The Trust will:

- Regularly review complaint data
 - Improve systems and processes
 - Update this Policy as required
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18. Breach Reporting

Where complaints identify a reportable situation, the Trust will:

- Comply with Australian Securities and Investment Commission (ASIC) breach reporting requirements
 - Take appropriate remedial action
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19. Policy Review

This Policy will be:

- Reviewed annually
 - Updated for regulatory changes
 - Approved by the Board of Trustees
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