

COMPLAINTS MANAGEMENT POLICY

OBJECTIVE

To establish a process for resolving complaints about the administrative actions of Council in accordance with section 268 of the *Local Government Act 2009*.

POLICY STATEMENT

Croydon Shire Council acknowledges the right of customers to provide feedback, both positive and negative, on the services it provides and the decisions it makes. It also understands that there are occasions when people may wish to lodge a complaint. Council will deal with complaints fairly, promptly and professionally and is committed to building the capacity of staff to effectively manage complaints in an environment of continuous improvement.

SCOPE

The complaints management process has been established for resolving complaints by affected persons about administrative actions of Council. The complaints process is for resolution of a complaint about the way in which an administrative action was carried out, not about the decision itself.

The complaints management process does not apply to a complaint:

1. disagreeing with a lawful decision of an employee or Council;
2. that could be made under Chapter 3 of the Act about competitive neutrality issues;
3. about official misconduct that should be directed to the Crime and Misconduct Commission;
4. about misconduct that should be directed to the Department of Local Government's Chief Executive Officer;
5. made under the *Public Interest Disclosure Act 2010*;
6. about a staff or Councillor's conduct matter. Complaints about Councillor's conduct will be dealt with under the relevant Act provisions;
7. about a development decision made under the *Sustainable Planning Act 2009* or other statutory instruments and legislation;
8. about a court decision.

OBJECTIVES

The complaints management process is established with the following objectives:

1. The fair, efficient and consistent treatment of complaints about decisions and other administrative actions of Council;
2. A complaints management process that is easy to understand and is readily accessible to all;
3. Detection and rectification, where appropriate, of administrative errors;
4. Identification of areas for improvement in the Council's administrative practices;
5. Increase in awareness of the complaints management process for the Council's staff and the community;
6. Enhancement of the community's confidence in the complaints management process and of the reputation of the Council as being accountable and transparent;
7. Building the capacity of staff to effectively manage complaints and receive feedback within an environment of continuous improvement;
8. Complaints will be acknowledged and resolved in a timely manner;
9. Council will manage complaints confidentially and ensure that complainants do not suffer any form of reprisal for making a complaint;
10. Council will abide by the principles of natural justice/procedural fairness when dealing with complaints.

POLICY COMMITMENT

Council intends to provide a level of customer service that does not attract complaints, but acknowledges the right of persons to provide feedback, both positive and negative, on its services and/or to lodge a complaint about the administrative actions of Council.

The complaints process has been instituted to ensure that, to the greatest practical extent, any complaint is dealt with fairly, promptly, professionally, in confidence (subject to any legal requirements) and in a manner respectful to the complainant.

The Council commits to providing adequate resources and officers to deal with complaints and to record and analyse complaints data. Complaints will be dealt with in accordance with the Complaints Handling Framework (Appendix A).

Council will endeavour to ensure that:

- Anyone who is dissatisfied with an action of the Council or a Council officer can easily and simply lodge a complaint;
- Complainants are provided with information on the complaints management process and, if necessary, assistance to make their complaint;
- Each complaint is initially assessed in terms of its seriousness, safety implications, complexity and degree of urgency;
- Council officers will receive complaints in a professional manner and welcome valid feedback as an opportunity for improvement of the Council's administrative practices;
- Complaints are responded to as quickly as possible and in accordance with the timeframes set out in the complaints process;
- Complainants will not suffer any reprisal from Council or its officers for making a complaint;
- Complaints are properly monitored with a view to continuous improvement of the Council's business processes; and
- If a complainant is not satisfied that a complaint has been satisfactorily resolved, he/she will be informed of any statutory right of review and, if they request, be provided with details of any further review mechanism that is available.

DEFINITIONS

Terms used in the complaints management process have the following meanings:

Administrative action complaint – an administrative action complaint that:

- a) Is about an administrative action of a local government, including the following,
 - a decision, or a failure to make a decision, including a failure to provide a written statement of reasons for a decision;
 - an act, or a failure to do an act;
 - the formulation of a proposal or intention;
 - the making of a recommendation; and
- b) Is made by an affected person.

Affected person – a person who is apparently directly affected by an administrative action of a local government.

CEO – the Chief Executive Officer of the Council.

Complainant – the affected person or organisation making a complaint.

Complaint – an expression of dissatisfaction by an affected person regarding a decision or other action of the Council.

A complaint is not the same as a request for service, a request for information or an enquiry seeking clarification of an issue. Examples of communications not classified as complaints under this policy include:

- an inquiry to seek clarification or further information about the amount of a rates bill
- a request to Council to take action on a barking dog, a leaking water pipe or any other services.
- An inquiry made to Council on a particular development or compliance matter that is processed in accordance with statutory or administrative timeframes established by Council,
- Petitions to Council.

Complaints Handling Framework – procedural steps adopted by the Council to deal with complaints under this policy.

Council – Croydon Shire Council.

Council officer – includes a permanent, temporary, casual or contract member on the Council's staff.

Business Unit Manager – a Council Manager who is generally responsible for various functions of the Council

Leadership Team (LT) – the CEO, Deputy CEO, Director Engineering Services, Manager Finance Services and Manager Business Services

Complaints Management Process (CMP) – is a process for resolving complaints about administrative actions of the local government.

Request for service – a request for the Council to take action to satisfy the needs of a customer or ratepayer. This may be of a physical nature, such as a request to fill a pothole or to collect a stray dog, or a request for information.

The Act – *Local Government Act 2009*

System of recording complaints – the nominated Council system for recording of complaints.

RESPONSIBILITY OF OFFICERS

Leadership Team

The Leadership Team will:

- encourage excellence in customer service by Council officers;
- ensure that all Council officers are aware of and implement the complaints process in the manner intended by the Council;
- foster an environment where complaints management is the responsibility of all Council officers; and
- ensure any necessary staff training is provided, e.g. on the complaints process, conducting an investigation of a complaint, conflict management, customer service skills.

Business Unit Managers

Each Manager will ensure that:

- a) all Council officers under their management and control are aware of their role in customer service and responsibility for complaint management; and
- b) service standards are met.

Council Officers

All Council Officers:

- a) are required to observe the complaints process; and
- b) wherever appropriate, attempt to resolve a complaint before it is referred for attention under the complaints process.

RELATED POLICIES OR PROCEDURES

All Council policies and procedures must be taken into consideration when considering or investigating a complaint under the complaints management process.

EVALUATION AND REVIEW OF THE COMPLAINTS MANAGEMENT PROCESS

Every two (2) years Council will conduct a review audit of the complaints management process.

The review audit will evaluate the performance of the complaints management process and will consider the following aspects, where necessary:

- Accessibility – whether the complaint process is readily available to members of the community and is user-friendly.
- Timeliness – whether timelines for responding to complaints have been met and, if not, remedial action proposed:
- Satisfaction – as evidenced by any complaint about the complaints process.
- Compliance – by considering reports on the operation of the complaints process.

The complaints process will be amended in terms of any adopted recommendation arising from the review.

COMMUNICATION

Council will take appropriate steps to publicise the complaints management process. For example, the Council will place this document on its website and include training on the complaints management process in the induction process for new employees and in other appropriate staff training forums.

SYSTEM OF RECORDING COMPLAINTS

The CEO will ensure that the necessary documentation and processes for the nominated system of recording complaints is kept updated and held as an appendix to this policy.

APPENDIX A

COMPLAINTS HANDLING FRAMEWORK

The following framework describes the model adopted by Council for handling complaints.

STAGE 1 Preliminary Procedures Review of complaint in Council service area where administrative action occurred - see sections of the complaints process.	Stage 2 Complaint Process Internal review by Council officer; External review by a person who is not a Council officer ; Further review by Council, if deemed necessary.	Stage 3 Complainant informed of other review options if not satisfied with Council decision on complaint, e.g. complaints agency such as the Queensland Ombudsman, other avenues of appeal or review or alternative dispute resolution.
---	--	---

STAGE 1 – PRELIMINARY PROCEDURES

1. Preliminary procedures before a complainant can make a complaint

This section applies if a person makes a complaint about an administrative action of the Council.

When a person makes a complaint without having contacted the relevant service area of the Council, the LT or CEO to try to resolve the complaint, the person may be required to take this initial step before the complaint will be registered and dealt with under the complaints process.

If the complaint is not resolved by the relevant service area, LT or CEO, the complaint will be dealt with in accordance with the complaints process.

Compliance with this section is not a pre-requisite to the submission of a formal written complaint under the complaints process where it is clear on the face of the document that a complaint has been made. In those circumstances the complaint will be dealt with under the complaints process, unless it is earlier resolved to the complainant's satisfaction or is withdrawn by the complainant.

2. The way a complainant may make a complaint

A complainant may make a complaint in any of the following ways:

- Orally, either by telephone or in person to a council officer;
- By email to admin@croydon.qld.gov.au; or
- In writing (by letter, fax, or by completing the Council's complaint form) addressed to the CEO.

All written and electronic complaints should be addressed to the CEO. The complainant's contact details should be identified so the Council can contact the complainant as required by the Act.

Anonymous complaints will be dealt with under the complaints process. Although, where the complaint cannot be actioned without further information from the complainant it will not be processed. Therefore depending on the subject matter, anonymous complaints will be assessed by the relevant area to see if any action is possible or required.

If an oral complaint is received, the CEO, or delegate, may request that the complaint be put in writing if it is of a complex nature or contains complex material.

The Council officer who receives an oral complaint will record details via an email/file note in the records management system and if the complaint is not resolved to the complainant's satisfaction, will refer the complaint for action under the complaints management process.

All written complaints will be referred to the CEO, or delegate, who will arrange for the complaint details to be recorded in the Customer Request Program.

If necessary, assistance may be provided by a Council officer to a complainant on how to make a complaint, including how it should be documented. The aim is to clarify the matter of concern to the complainant and the outcome/s sought.

If a complainant requires interpreter services, or has special needs, the complainant will be referred to the appropriate Council officer who will provide advice or arrange for the giving of assistance, to the extent practicable.

Complaints by agents

If a complaint is lodged on behalf of a person by a professional advisor, e.g. a solicitor or accountant, the Council will respond direct to that advisor.

A complaint lodged by a person as agent for an affected person will be responded to direct to the affected person and not to the agent, unless a letter of authority is provided indicating the agent is acting on behalf of the affected person and the Council considers that the appointment as agent has been validly made.

STAGE 2 – COMPLAINT PROCESS

3. Process for selecting and appointing a complaints officer to investigate complaints

The Council has by resolution delegated to the CEO the power to select and appoint a person or persons to be a complaints officer to investigate complaints.

The CEO may delegate his/her powers under the above to another employee of the Council under the Act.

The investigation is to be undertaken either by way of internal review or external review. Relevant criteria to be applied in making the decision about the method of review are:

Internal review

An internal review of a complaint will be conducted if it is deemed that an internal complaints officer is available that has not been involved in the administrative action. The review will be conducted by the CEO, or an officer appointed by the CEO or the CEO's delegate.

External review

External review of a complaint will only be undertaken after the complainant has undertaken the preliminary procedure via the relevant service area.

An external review of a complaint can also occur where deemed appropriate by the CEO or delegated officer.

Complaints will generally be entitled to an external review if the complaint concerns an administrative action undertaken by one of the persons described below following an investigation by the complaints officer:

- a) the Council at a Meeting;
- b) the Mayor acting under statutory or delegated authority;
- c) the CEO.

Appointment of reviewer

The CEO, or delegate, will:

- a) assess the nature of the complaint and determine whether the complaint is to be investigated by means of internal review or external review;
- b) delegate to a complaints officer under a delegation of authority or based on the review criteria, appoint a suitable person as the Complaints Officer for that purpose; and
- c) give the person appointed as the Complaints Officer an instrument of appointment or other instruction that also stipulates the date by which the Complaints Officer must complete the report on the investigation if the complaint is not earlier resolved to the complainant's satisfaction or is withdrawn by the complainant.

The person appointed as a Complaints Officer for a complaint must have the appropriate knowledge, qualifications, skill and experience, including the relevant investigative, analytical and correspondence skills, to conduct an investigation into the complaint, make findings, formulate recommendations (where appropriate) and prepare an appropriate report on the outcome of the investigation for consideration by the Council or its delegate.

The Complaints Officer appointed to investigate a complaint by way of internal or external review must not have been involved with the administrative action or alleged minor breach in question.

4. Sending complaints to, and their investigation by, the Complaints Officer

The CEO, or officer authorised by the CEO ("authorised officer"), after the complaint has been recorded, will arrange for the complaint and other materials, including relevant documents from the Council's records, to be forwarded to the Complaints Officer for assessment of the complaint as soon as practicable after the officer's appointment.

The CEO or delegate will give the person appointed as the complaints officer an instrument of appointment that also stipulates the date by which the complaints officer must complete the report on the investigation if the complaint is not earlier resolved to the complainant's

satisfaction or is withdrawn by the complainant, or the times for completion is formally extended.

The timeframe for dealing with a complaint will depend on an assessment of the following factors by the CEO or authorised officer:

- the urgency of the situation in terms of loss or damage likely to be suffered if the complaint is not quickly resolved;
- the likelihood that the complaint can be quickly resolved;
- the complexity of the complaint issue/s;
- whether the complaint requires internal review or external review in accordance with the criteria for the selection of a Complaints Officer for the complaint as set out in the complaints management process.

In general terms, the Council will endeavour to meet to the following timeframes for dealing with a complaint:

- for *urgent* matters - within fourteen (14) days;
- for *non-urgent* complaints that are not considered to be complex or where the complaint is to be investigated under the internal review mechanism - within thirty (30) days; or
- for *complex* complaints or where the complaint is to be investigated under the external review mechanism - within sixty (60) days.

If the nominated timeframe for dealing with a complaint cannot be met for any reason, the CEO or delegate may, once only, extend the time for dealing with the complaint and notify the complainant in writing of the extension before the expiry of the initial timeframe. In determining any extension of time, the CEO or delegate, must consult with the Complaints Officer for the complaint and fix a date that is reasonable in all the circumstances, but in no case more than three (3) months from the date the complaint was received by the Council.

The Complaints Officer will acknowledge receipt of the complaint and any other material, indicating the date of receipt.

If a complaint is resolved to the complainant's satisfaction before it is sent to a Complaints Officer for investigation, notice that the complaint has been resolved may be given to the complainant in the same medium by which the complaint was initially made, e.g. an oral response may be given to a complaint that was made orally.

However, the Council may give a formal written response to a complaint irrespective of the medium by which the complaint was made. The Council will make a record of any oral advice given to a complainant that the complaint has been resolved.

As a condition of appointment, an external reviewer will be required, when forwarding his/her investigation report to the CEO, to return all records and documents relating to the investigation.

The timeframe for dealing with a complaint is measured from the date of receipt of a complaint to the date the complainant is informed of the outcome of the complaint.

5. Opportunity for complainant to provide further information about the complaint

The Complaints Officer may invite the complainant to provide further information after the initial assessment of the complaint material to assist in fully understanding the complainant's concerns, the issue/s to be investigated (if an investigation is to be undertaken) and the outcome or remedy sought by the complainant.

Seeking further information from the complainant at this stage of the complaints process may be undertaken by informal means such as telephone, e-mail or face-to-face discussion. The Complaints Officer will record a fair summary of any oral information received and will confirm with the complainant in an appropriate manner that the summary accurately reflects the information provided by the complainant.

6. Grounds for refusal to investigate complaint

In assessing a complaint (including any further information provided by the complainant) the Complaints Officer will consider whether there is a statutory ground on which the complaint may be refused. The Complaints Officer may refuse to investigate a complaint or, having started to investigate a complaint, refuse to continue the investigation if the officer and CEO reasonably considers that:

- a) the complaint is trivial; or
- b) the complaint concerns a frivolous matter or was made vexatiously; or
- c) the complainant does not have a sufficient direct interest in the administrative action or alleged minor breach the subject of the complaint; or
- d) both of the following apply -
 - i. the complainant has a right of appeal, reference or review, or another remedy, that the person has not exhausted;
 - ii. it would be reasonable in the circumstances to require the complainant to exhaust the right or remedy before the officer investigates, or continues to investigate, the complaint;
- e) in the circumstances, investigating the complaint is unnecessary or unjustifiable.

The Complaints Officer will give both the Council and the complainant written notice of a decision made by the officer to refuse to investigate the complaint, or to continue the investigation, and the reasons for the decision.

7. Investigating a complaint

The Complaints Officer will attempt to resolve the complaint informally, for example, by providing an explanation for the Council's action in the particular case. A complaint may be resolved or withdrawn by the complainant at any time during the complaints process. A complaint is taken to be resolved to the complainant's satisfaction, or is taken to be withdrawn, if the complainant gives a clear indication to that effect to the Complaints Officer. Written notice that the complaint has been resolved, and the general manner in which it was resolved, will be given to both the Council and the complainant.

If in the opinion of the Complaints Officer, resolution of a complaint about an administrative action merely involves rectification of an obvious error or a remedy of a similar nature, the Complaints officer will discuss the issue with the relevant Council officer with a view to resolving the complaint.

The investigation of a complaint will be undertaken by the Complaints Officer in an independent, impartial and objective manner. A Complaints officer may, if the Officer considers appropriate in the circumstances, undertake mediation between the parties with a view to resolving a complaint, but will not act as an advocate.

The investigation of a complaint will typically involve the following stages:

- 1) preparation of an action plan for conducting the investigation;

- 2) information gathering, including discussions and interview with the complainant, Council personnel and third parties (where relevant) and examining relevant laws and Council policies and procedures;
- 3) analysis of all relevant information obtained;
- 4) formulation of findings and any recommendations for the Council's consideration;
- 5) preparation of a report on the results of the investigation or the outcome of the complaint if it was resolved during the complaints process or was withdrawn by the complainant.

The Complaints Officer will adhere to the following principles when conducting an investigation of a complaint:

- Procedural fairness/natural justice;
- Establishment and maintenance of a complete document trail (to facilitate any subsequent review that may be undertaken of the investigation conducted by the Complaints Officer);
- Council and other policies are designed for administrative guidance only, and should not be rigidly applied irrespective of the merits of a particular case. An administrative policy may be departed from if the merits of a particular case warrant that course of action.
- Lawfulness of a particular action is not necessarily decisive of the issue in dispute. The Complaints Officer will also assess whether the action was unfair, unreasonable or wrong.
- The civil standard of proof applies for administrative investigations. This means that allegations have to be established on the balance of probabilities – that is, it must be more probable than not that the allegation is made out; and
- Confidentiality about the investigation must be maintained to the extent that it can reasonably be achieved, subject to other legal requirements about the disclosure of information.

8. Obligation of Complaints Officer on completion of investigation

If a complaint is not resolved during the investigation process to the satisfaction of the complainant or is not withdrawn by the complainant, the Complaints Officer will give the CEO (or Council if applicable) and the complainant a written report on the results of the investigation and any recommendations. The Complaints Officer must give the report to both the CEO (or Council if applicable) and the complainant within the time stipulated in the instrument of appointment, subject to any approved extension of time.

The report will typically address the following matters to the extent each matter is relevant in the particular case:

- the complaint issue/s;
- a concise summary of the material facts and circumstances of the matter;
- any relevant legislation;
- any relevant Council or other policy;
- persons interviewed and/or consulted and relevant information obtained during any interview and consultations;
- results of any relevant research;
- analysis of complaint issues to the extent necessary;
- findings on material questions of fact and law;
- whether the complaint is sustained and reasons for that finding;
- if the complaint is sustained, any recommendation/s to the CEO (or Council) to redress the complainant's grievance, whether by way of benefit to the complainant

and other affected persons (if any) and/or systemic improvements to the Council's administrative practice with a view to preventing a recurrence of similar complaints.

An internal complaints officer has fulfilled the reporting requirements by drafting a suitable response notice or report to Council.

The report will contain any recommendations that the Complaints Officer considers to be appropriate in the circumstances. In some cases, it will be appropriate to make a recommendation for procedural improvement even where the complaint has not been sustained. A recommendation may relate to:

- a specific remedy or remedies that is/are available to redress the complainant's grievance; and/or
- the proposed amendment of a relevant Council policy, procedure or practice to address any systemic issue raised by the complaint with a view to preventing similar complaints in the future.

9. Remedies

The Council has adopted a range of remedies for addressing administrative actions that it considers to be unfair or wrong. Remedies include, but are not limited to:

- an explanation for the action in question;
- an admission of fault;
- an apology;
- revocation or amendment of the decision;
- rectification, including repairing or replacing the matter in dispute;
- revision of relevant policy, procedure or practice;
- provision of technical assistance;
- reimbursement of costs incurred as a result of the action in question;
- financial compensation, including an *ex-gratia* payment; or
- waiver of debt.

More than one remedy may be applied in the particular case if the circumstances justify that course of action.

10. Consideration of report by Council

Report about an administrative action

A Complaints Officer's report prepared under the complaints process, including any recommendation(s), on a complaint about an administrative action will be considered:

- a) by the Council by resolution if the administrative action in question was taken by:
 - i. the Council at a meeting;
 - ii. the Mayor acting under statutory or delegated authority;
 - iii. the CEO; or
 - iv. another Council officer where the requirement that the Complaints Officer be no less senior than the officer who took the administrative action, cannot be met;
- b) by the CEO under delegated authority if the administrative action in question was taken by a senior officer who reports directly to the CEO; or
- c) by another Council officer under delegated authority if the administrative action in question was taken by a Council officer who is not more senior than the delegate.

A Council officer exercising delegated authority to deal with the complaint, by accepting or rejecting the findings of the Complaints Officer, has authority to provide any lawful remedy for the complaint that is available under the complaints process, irrespective of whether the remedy has been recommended by the Complaints Officer.

Where the Complaints Officer's report includes a recommendation that a suitable policy be made to address the complaint issue, or an existing policy be appropriately amended, the recommendation will be referred to the Council for consideration by resolution if deemed appropriate by the CEO.

11. Notice to complainant about outcome of complaint

Written notice of the outcome of a complaint will be given to the complainant following the Council's consideration of, and decision on, the Complaints Officer's report and recommendations (if any).

The notice to the complainant will generally include the following advice:

- a) whether the complaint is sustained;
- b) if the complaint is not sustained, the reasons for the decision;
- c) if the complaint is sustained
 - i. any remedy to be made available to the complainant;
 - ii. if applicable, the circumstances and timeframe in which the remedy will be made available; and/or
 - iii. whether the investigation identified the need to revise Council policy, procedure or practice to prevent similar complaints arising, details of the proposed revision and the timeframe for implementation.

12. Implementation of remedy

The Council, through the CEO or delegate, will take action in a timely manner to implement any remedy to be made available to a complainant and/or any revision of its policy, practice or procedure.

13. Council review if complainant dissatisfied with outcome of complaint

If a complainant is dissatisfied with the outcome of the consideration of the Complaints Officer's report and any recommendation, the complainant may request a review of the decision on the complaint. The complainant may submit new information with the request for review and seek reconsideration of the complaint on the basis of the new information or on any other basis.

The Council will –

- undertake the review as requested and advise the complainant accordingly; or
- decline the review on the basis that the complainant has not provided any reasonable basis for the review.

Any review undertaken will generally be in accordance with the complaints process. The reviewer will be independent of the original decision maker and the Complaints Officer.

STAGE 3 – REVIEW BY OMBUDSMAN OR OTHER COMPLAINTS ENTITIES

14. Review by other complaints entities

If the Council decides not to undertake a review, it will inform the complainant that a complaint may be lodged with the Queensland Ombudsman or other relevant complaint entity (providing contact details).

COMPLAINTS MANAGEMENT SYSTEM

15. Reporting on complaint trends

Annually, commencing from the date the complaints process commenced, the CEO or delegate will complete a report on all complaints (oral and written) received through the complaints process, being complaints about administrative actions of the Council.

The report will include details for the particular twelve (12) months and the financial year to date and, to the extent details are available, draw comparisons with corresponding periods for the (2) immediately preceding financial years.

Each report will set out:

- a) details of complaints received and resolved during the period;
- b) whether timeframes were met;
- c) how each complaint was dealt with (pre-complaint stage, by Complaints Officer, CEO decision or Council decision on Complaints Officer's report, or still not resolved to complainant's satisfaction);
- d) a brief description of the outcome, including any remedy given to a complainant;
- e) details of any service delivery or business improvements that have been effected as an outcome of the Council's consideration of complaints.

The report will also:

- contain details of any systematic issues that have been identified and/or whether there is any trend in the complaints received; and
- suggest whether any other action should be taken to change service delivery and/or improve business activities, services, systems and staff skills, etc.

The CEO will discuss the report with the LT and will thereafter submit it to the Council for consideration, together with any comments from the LT.

Details about complaints concerning administrative actions will be provided in the Council's annual report, as required by section 115 of the *Local Government (Finance, Plans and Reporting) Regulation 2010*.

REVIEW

This Policy is to be reviewed by Council for applicability and consistency with other related documents and legislative provisions at the earlier of any of the following:

- (a) Upon any documents related to this Policy being amended or replaced; or
- (b) Upon any legislative or regulatory documents relating to this Policy being amended or replaced; or
- (c) At any time Council deems appropriate; or
- (d) As a minimum, no later than 17/01/2014.