



City & Southwest

Construction Complaints Management System – Sydney Metro City & Southwest

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1 Construction complaints management system

1.1 Document purpose

This document forms part of the Sydney Metro Communication and Engagement Management System. Its purpose is to outline the procedure for managing complaints across Sydney Metro. This includes:

- Receiving complaints
- Classifying complaints
- Responding to complaints
- Escalation
- Mediation
- Recording complaints
- Reporting

This construction complaints management system will be reviewed as required. This would occur where a change to this plan is necessary due to any of the following:

- A major change in project scope
- A change to the planning approval condition B1
- Triggered by preventative actions identified as a result of a non-compliance, incident or audit finding.

1.2 Responsibilities

Complaints handling is the responsibility of all team members who come into contact with the community and stakeholders. The Director, Project Communications is the designated complaints handling management representative for the escalation of complaints.

Table 1 Responsibilities for complaints

Source: Sydney Metro Overarching Community Communication Strategy – May 2022

Role/Organisation	Responsibility
Environmental Representative	<ul style="list-style-type: none"> Assist in resolving complaints in accordance with this Strategy.
Acoustic Advisor	<ul style="list-style-type: none"> Assist in resolving complaints in accordance with this Strategy in relation to SSI 7400 Chatswood to Sydenham only.
Community Complaints Mediator	<ul style="list-style-type: none"> Follow-up, Investigate, Review and provide mediation services deemed relevant to any complaint escalated by the Director, Project Communications where a member of the public is not satisfied with the response. Request advice from the Environmental Representative, Acoustic Advisor (SSI 7400 only) or the Retail Advisory/Support Panel, or any other subject matter expert as required to assist in the resolution of an escalated complaint.
Retail Advisory/Support Panel	<ul style="list-style-type: none"> Administer the Small Business Owners Support Program Provide recommendations to assist in the resolution of escalated cases from small business operators.

Sydney Metro Project
Communications team

- Manage Sydney Metro 24-hour call centre.
 - Implement the Construction Complaints Management System (this document).
 - Treat all people with respect
 - Assist people make a complaint where required
 - Provide feedback and suggestions on ways to improve complaint management
 - Implement changes arising from complaints and from analysis and evaluation of complaint data as advised by senior managers.
 - Forward relevant complaints to contractors or Sydney Trains immediately.
 - Investigate and determine the source of a complaint **immediately**, including an **initial** call to the complainant (when received by phone or where a telephone number was provided or available on Consultation Manager).
 - Provide an initial response to all complaints **within two hours** (where a phone number is provided or available on Consultation Manager) from the time of the complaint unless the enquirer agrees otherwise.
 - Provide a written response to emails, letters/faxes within **24 hours** (or verbally **within two hours** if a phone number is provided or available on Consultation Manager).
 - Keep the complainant informed of the process until the complaint is resolved.
 - Close out complaints within agreed timeframe (with complainant).
 - Provide advice and guidance on complaint management to contractors and ensure due diligence applied by contractor(s) to implement recommendations made to mitigate reoccurrence and/or address complaint.
 - Ensure internal avenues of escalation and review have been exhausted by the relevant contractor(s) and all opportunities have been explored **PRIOR** to escalation to the Proponent
 - Ensure all avenues of internal escalation are utilised and considered by Sydney Metro.
 - Escalate complaints in accordance with Construction Complaints Management System (this document).
 - Record all complaints on Consultation Manager in accordance with Consultation Manager data entry procedure **within 24 hours**. Details should include how it was managed and closed out.
-

Contractor delivery
communication teams

- Answer **all phone calls** transferred by the call centre from the community information line (calls to be answered by a team member 24/7, not an answering machine while construction activities are occurring).
- Develop and implement procedures for managing and resolving stakeholder and community complaints directed to the contractor in accordance with the Construction Complaints Management System (this document) and the relevant projects' Conditions of Approval.
Refer complaints not associated with contractor activities to the Sydney Metro Project Communications team **immediately**.
- Investigate and determine the source of a complaint **immediately**, including an **initial** call to the complainant (when received by phone or where a telephone number was provided or available on Consultation Manager).
- Provide an initial verbal response to all complaints **within two hours** (where a phone number is provided or available on Consultation Manager) from the time of the complaint unless the enquirer agrees otherwise.
- Provide a written response to emails, letters/faxes within **24 hours** (or verbally **within two hours** if a phone number is provided or available on Consultation Manager).
- Keep the complainant informed of the process until the complaint is resolved.
- Provide feedback to requests for information from the Sydney Metro Project Communications team or the Community Complaints Mediator **within two hours**.
- Comply with advice, guidance and processes as suggested from the Sydney Metro Project Communications team and/or the Community Complaints Mediator in relation to the resolution of a complaint prior to the escalation of a complaint, at all stages of complaint management, inclusive of when a complaint has been escalated.
- Take all actions and implement all measures inclusive of those recommendations made during any escalation or review process to prevent the reoccurrence of a complaint.
- Close out complaints within agreed timeframe (with complainant).
- Escalate complaints in accordance with the Construction Complaints Management System (this document).
- Report to the Sydney Metro Project Communications team and the Environmental Representative on a **daily basis**. Record all complaints on Consultation Manager in accordance with Consultation Manager data entry procedure **within 24 hours**. Details should include how it was managed and closed out.

Role	Responsibility
Sydney Trains/TfNSW/SLR	<ul style="list-style-type: none"> Refer complaints received directly in relation to Sydney Metro work back to Sydney Metro for investigation and resolution. Assist in resolving complaints where work may overlap in the rail corridor.
Department of Planning & Environment and NSW Environment Protection Authority and local Councils	<ul style="list-style-type: none"> Refer complaints received directly in relation to Sydney Metro work back to Sydney Metro for investigation and resolution in the first instance.

1.3 Conditions of Approval

Each Project's approval has requirements around complaints handling including the creation of a Construction Complaints Management System. This document fulfils this requirement for both Sydney Metro City & Southwest Planning Approvals:

- Chatswood to Sydenham (SSI 7400)
- Sydenham to Bankstown (SSI 8256).

Table 2 Conditions of Approval relevant to complaint management

Ref	Requirement	C2S	S2B	Section
B5 B6	A Complaints Management System must be prepared and implemented before the commencement of any work and maintained for the duration of works/construction and for a minimum for 12 months following completion of Construction of the CSSI.	●●	●●	This document
B6 B9	The following facilities/ information must be available to facilitate community enquiries and manage complaints one (1) month from the date of this approval/before the commencement of work and for 12 months following the completion of construction and appropriately broadcast to collect community enquiries and complaints: (a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) place-based community manager for each of the station locations available to meet with community members on request.	●●	●●	(a, b, c) - Section 2 (d) – Contract specific Community Communications Strategy (d) –Section 5
B10	The telephone number, postal address, website URL and email address required under Condition B6/B9 of this approval must be published in a newspaper circulating in the relevant local area and on site hoarding at each Construction site before the commencement of Construction and published in the same way again before the commencement of Operation. This information must also be provided on the website required under Condition B14/B15 of this approval.	●●	●●	Overarching Community Communications Strategy
B8 B7	The Complaints Management System must include/A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of Work and for a minimum of 12 months following the completion of Construction. The Complaints Register must record the:	●●	●●	Section 6

Ref	Requirement	C2S	S2B	Section
	(a) number of complaints received; (b) number of people affected in relation to a complaint; and (c) means by which the/nature of the complaint was addressed and whether resolution was reached, with or without mediation.			
B9 B8	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	●●	●●	Section 6
B10 B11	A Community Complaints Mediator that is independent of the design and construction personnel must be nominated by the Proponent, approved by the Planning Secretary and engaged during Work associated with the CSSI. The request nominating the Community Complaints Mediator must be submitted to the Planning Secretary for approval within one (1) month of the date of this approval or within another timeframe agreed with the Secretary.	●●	●●	Section 5
B11 B12	The role of the Community Complaints Mediator must address any complaint where a member of the public is not satisfied by the Proponent's response. Any member of the public that has lodged a complaint which is registered in and executed through the Complaints Management System identified in Condition B5/B6 may ask the Community Complaints Mediator to review the Proponent's response. The application must be submitted in writing and the Community Complaints Mediator must respond within 28 days of the request being made or other specified timeframe agreed between the Community Complaints Commissioner/Mediator and the member of the public.	●●	●●	Section 5
B12 B13	The Community Complaints Mediator will: (a) review the Proponents unresolved disputes between the project and members of the public if the procedures and mechanisms under Condition B5 or Condition B2 ((g) (iii) do not satisfactorily address the complaints and (b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes.	●●	●●	Section 5

Ref	Requirement	C2S	S2B	Section
B14	The Community Complaints Mediator will not act before the Complaints Management System required by Condition B5, including any internal escalation process, has been executed for/the proponent has provided an initial response to a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in this approval or clear government policy and resolution processes are available, or matters which are not within the scope of the CSSI.	●●	●●	Section 5

1.4 Complaints Handling

Sydney Metro's approach to managing complaints is based on the following guiding principles:

1.4.1 Accessibility

All Sydney Metro public materials will direct stakeholders wishing to make a complaint to use our:

- Community information line
- Community email address
- Project postal address.

The Sydney Metro website includes information about how to make a complaint and the role of the Community Complaints Mediator.

1.4.2 Responsiveness

Our responsibilities for complaint handling include:

- Investigate and determine the source of a complaint **immediately**, including an **immediate** call to the complainant (when received by phone).
- Provide an initial response to all complaints **within two hours** (where a phone number is provided or available on Consultation Manager) from the time of the complaint unless the enquirer agrees otherwise.
- Keep the complainant informed of the process until Sydney Metro believes the complaint has been responded to completely.

1.4.3 Confidentiality

Personal information that identifies individuals will only be disclosed or used by Sydney Metro as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

A stakeholder's contact information along with their complaint will be recorded for the purposes of addressing their complaint. Should they wish to remain anonymous, the complaint will be registered under an 'Anonymous' stakeholder for recording keeping and reporting purposes.

Any process undertaken by the independent mediator will be subject to confidentiality provisions. These provisions will be explained to all parties involved.

1.4.4 Continual improvement

This construction complaints management system will be reviewed and reissued annually, or as required.

Continual review of processes and customer feedback will be incorporated to ensure improvement.

2 Receiving complaints

Sydney Metro has established the following tools for receiving complaints from the community. At a minimum, the telephone number, the postal address and the email address shall be published in newspaper(s) circulating in the local area prior to the start of construction for each project. This information will also be provided on the Sydney Metro website.

Contractors will be encouraged to develop other innovative ways to distribute these tools to the community.

Table 3 Community contact tools

Tools	Explanation and purpose
Community information line	<p>This allows stakeholders and the community to have access to the project teams 24 hours a day during construction. All communication materials and the website will include the community information line number.</p> <p>During construction, calls will be redirected to relevant contractors as required.</p> <ul style="list-style-type: none"> Sydney Metro City & Southwest – 1800 171 386
Community email address	<p>This allows stakeholders and the community to have access to the project teams. All communication materials and the website will include the community email address.</p> <p>During construction, emails will be redirected to relevant contractors as required.</p> <ul style="list-style-type: none"> Sydney Metro City & Southwest – sydneymetro@transport.nsw.gov.au
Community post box	<p>This central postal address allows stakeholders and the community to have access to the project teams.</p> <p>The website will include a central Sydney Metro community postal address. Correspondence will be redirected to relevant project teams and contractors as required.</p> <ul style="list-style-type: none"> Sydney Metro City & Southwest - PO Box K659, Haymarket, NSW 1240
Sydney Metro website	<p>Information about the project will be available on the Sydney Metro website. The website will be referenced in all communication materials as a source of</p>

Tools**Explanation and purpose**

Information and will be updated on a regular basis. Information will include:

- Project information including:
 - Description of the project, current status and timing
 - Newsletters
 - Notifications
 - Up-to-date project information
 - Graphics and images on the project background and progress
 - Copies of relevant reports
 - Photos, images and maps
 - Links to documents as required under the relevant projects Conditions of Approval
 - A link to Sydney Metro contractor webpages
- Contact information
- <https://www.sydneymetro.info>

3 Classification of complaints

The Australian and New Zealand Standard Guidelines for complaint management in organisations AS/NZS 10002:2014 (AS/NZS Complaint Management Standard) defines complaints as an:

Expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

Based upon this standard a complaint includes:

- A complaint about conduct, service or product
- An internal review of a complaint – request a review of the merits of a decision
- An internal review about how a complaint was handled
- An external review of a complaint or how the complaint was handled

Sydney Metro classifies complaints into two categories for reporting purposes:

- Unavoidable complaints
- Avoidable complaints.

The main aim of these complaint categories is to record complaints received, but not unfairly penalise our contractors for complaints received about works they have approval to do.

3.1 Unavoidable complaints

Unavoidable complaints include a stakeholder's opposition to the project or government policy or complaints about issues that are within project planning approvals.

For example:

- A complaint about noise generated at night when planning approval has been granted for night works and noise generated is within approved criteria.
- A complaint about how traffic is being controlled when the approved Traffic Management Plan is being implemented.

3.2 Avoidable complaints

Complaints about issues outside planning approval, or a commitment that has been given to the community or stakeholders. These commitments may be contained in staff inductions or written notifications.

For example:

- A complaint about noise at night where work is being performed outside of approved criteria. For example: work outside of approved (or notified) construction hours or approved noise levels.
- A complaint about how traffic is being controlled. Only applies when the approved Traffic Management Plan is not being implemented.
- A complaint about poor worker behaviour, for example: littering, swearing, poor driving behaviour, when an induction has specified that behaviour is not acceptable.

3.3 Determining an unavoidable complaint

When categorising a complaint as 'unavoidable' evidence should be referred to in the complaint notes about why the complaint has been categorised this way.

Sydney Metro can provide Contractors, with advice and guidance on the types of evidence required to be recorded within Consultation Manager.

3.4 Resolving classification

If the Sydney Metro Project Communications team and the contractor cannot agree on a classification of unavoidable, the Independent Environment Representative maybe able to assist in classifying the complaint as it relates to the planning approval or commitments given to the community.

4 Responding to complaints

4.1 Receiving a complaint

Upon receipt of a complaint, details of the complaint will be recorded within Consultation Manager. Accurate records will be maintained regarding receipt, handling and outcomes of complaints received.

All complainants should be informed in general terms of:

- The complaints processes and procedures that the organisation will follow in relation to the complaint
- The likely timeframes for completing tasks relating to the complaint
- The responsibility of the organisation in relation to the complaint and the person making the complaint.

It is important to outline what is expected from complainants. Complainants have responsibility to:

- Clearly identify their issues of complaints
- Provide all relevant information about their complaint
- Cooperate with any requests for information or inquiries
- Act honestly
- Treat the people handling their complaint with courtesy and respect.

4.2 Managing unreasonable complainant conduct.

Unreasonable conduct by a complainant can be defined as any behaviour by a current or former complainant that due to its nature or frequency raises health, safety, resource or equity issues for relevant parties. The parties that may be detrimentally affected include the organisation responsible for handling the complaint, the person managing the complaint, the person dealing directly with the complainant, the person making the complaint and other complainants and services.

Unreasonable conduct may take the form of unreasonable persistence, unreasonable demands, and unreasonable lack of cooperation, unreasonable arguments and unreasonable behaviour inclusive of but not limited to aggressive, abusive and threatening behaviour.

Unreasonable conduct by complainants will result in referral to senior management for the recommendation of strategies being implemented to manage the behaviour. Complainants will be advised of the strategy that will establish limits and conditions regarding acceptable and unacceptable conduct and how their complaints will be managed.

The recording and response to complaints received by unreasonable complainants will also be the subject of modification.

4.3 Referring complaints

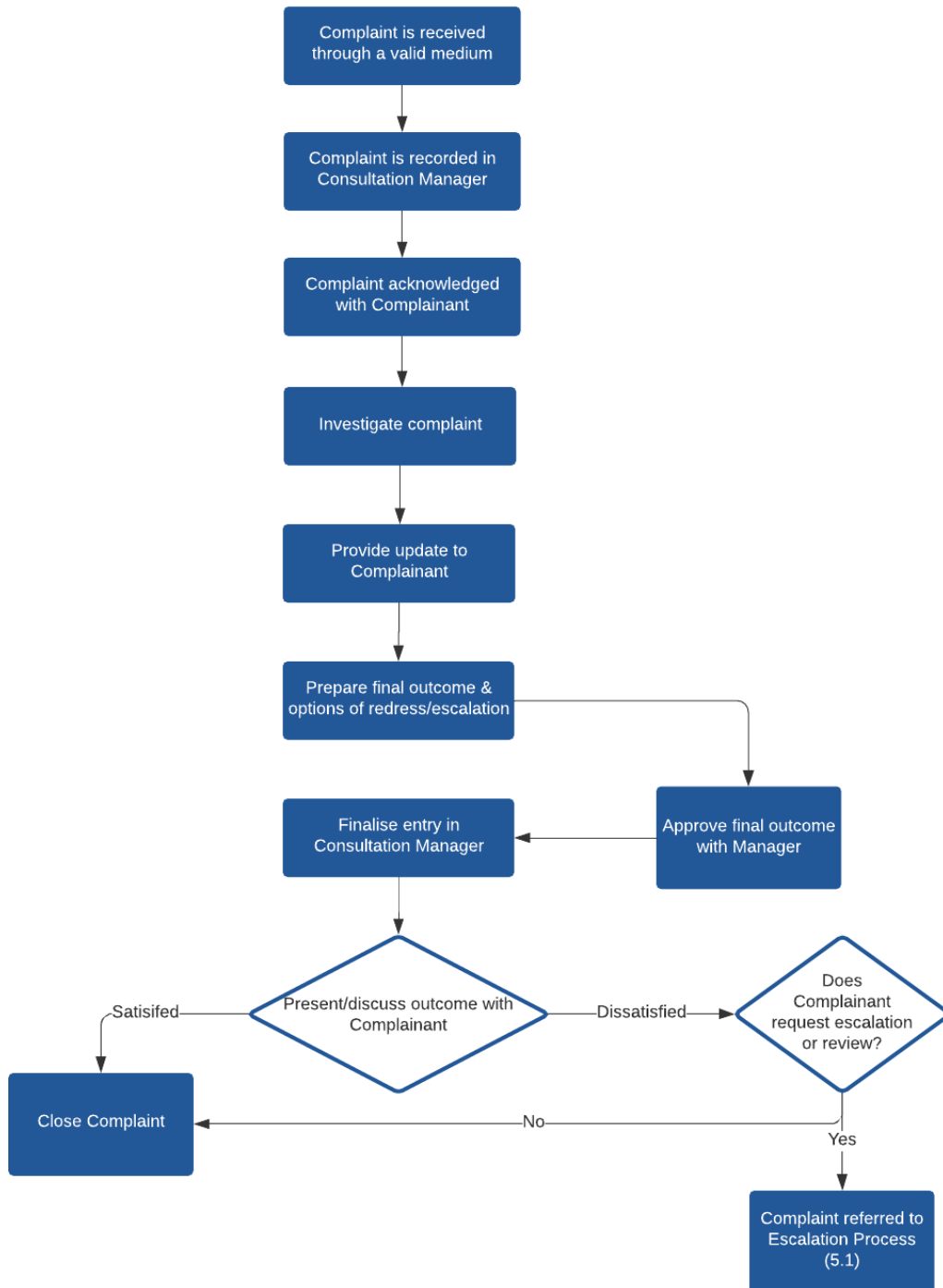
Regardless of how a complaint is received, it must be referred to the most appropriate agency as soon as they are received. The following table outlines the referral process.

Table 5 Guideline for referring complaints

Type of complaint	Description	Referred to
Early construction works	Complaint is about early works activities or the early works contractor	Place Manager, Early Works or contractor representative
Construction site specific	Complaint is about construction work, behaviour or activities at/or around a Sydney Metro construction site (except early construction works)	Relevant construction contractor representative
Overall project or government policy	Complaint about the need for the project, the projects procedures or processes the approval process, or TfNSW policy position	Sydney Metro Director, Project Communications
Media	Complaint has come via a member of a media organisation	Sydney Metro Director, Project Communications
Government or ministerial enquiry	Complaint has come via a member of a local, state or federal government body, government department or ministerial department	Sydney Metro Director, Project Communications
Unrelated to Sydney Metro	Complaint is unrelated to Sydney Metro	Sydney Metro Communications Manager
Precinct Planning	Complaint related to precinct planning around Sydney Metro station sites	Sydney Metro Senior Communications Manager
Relates to other TfNSW projects	Complaint is unrelated to Sydney Metro but relates to other areas of TfNSW	Relevant area of TfNSW
Relates to SLR	Complaint is received by Sydney Metro that relates to SLR	Transdev and/or ALTRAC
Relates to Sydney Trains	A complaint received by Sydney Metro that relates to work being done by Sydney Trains in the same vicinity during a possession	Relevant area of Sydney Trains

4.4 Responding to complaints

Responding to Complaints



5 Complaint escalation procedure

5.1 When to escalate a complaint

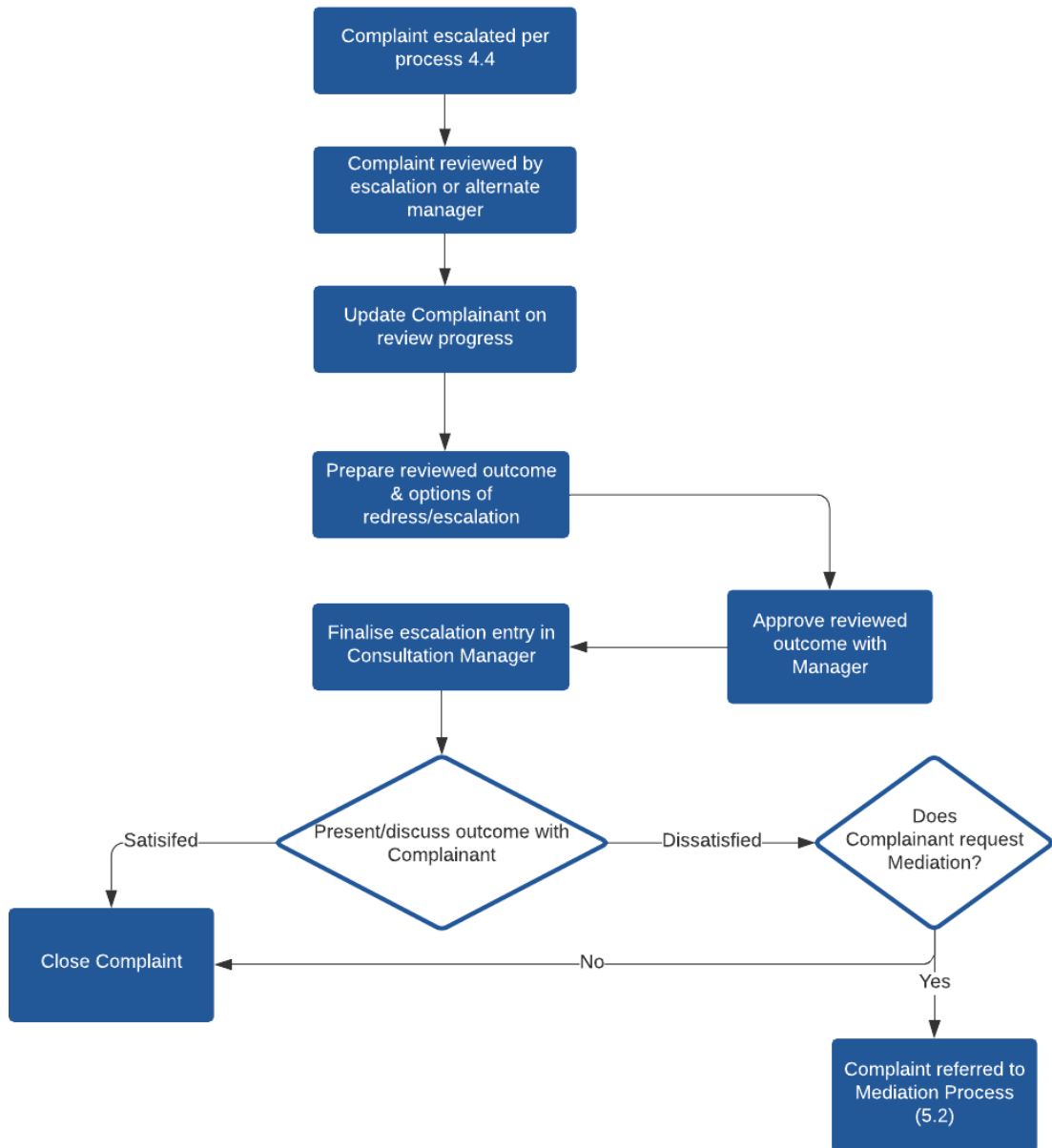
Complaints may be subject to an internal escalation process in circumstances when;

- The complaint cannot be resolved using the procedure in section 4, within a reasonable timeframe agreed to by the complainant.
- The nature of the complaint falls into one of the following categories:
 - An activity generates three complaints within a 24-hour period (separate complainants).
 - Any construction site receives three different complaints within a 24-hour period.
 - A single complainant reports three or more complaints within a three day period.
 - A complainant threatens to escalate their issue to the media or government representative.
 - The complaint was avoidable
 - The complaint relates to a compliance matter.

Complaints will be escalated internally to Sydney Metro's complaint management team. At the outset, contractors will be required to work with Sydney Metro management representatives with the view of resolving the complaint. The contractor will be required to satisfy Sydney Metro representatives that considerations and recommendations have been implemented and all avenues available to them have been exhausted prior to seeking further escalation. Complainants will work with Sydney Metro management representatives and any other internal or external subject matter experts with the view to working together to resolve their complaint.

5.1.1 How to Escalate a Complaint

Complaint Escalation Process



5.2 Role of the Community Complaints Mediator

In some circumstances where the complaints handling management representative for the project is unable to resolve the complaint, the complaint may be escalated to the project Community Complaints Mediator.

The role of the Community Complaints Mediator (CCM) is to facilitate communication between parties in conflict with the view to guiding/assisting these parties to reach a voluntary mutually agreeable outcome to the dispute. It is acknowledged that the role of the community complaints mediator is to mediate and not arbitrate. The mediator can actively encourage and facilitate discussion to move toward an outcome, however, cannot order or decide an outcome for the parties.

The Community Complaints Mediator will provide information as to the mediation process during initial consultation, these actions will be dependent upon the complaint escalated, however may include:

- *Through facilitation or other process(es) provide guidance, skills transfer and other services that aim to assist with any internal escalation mechanism*
- *Meet with aggrieved parties to understand concerns and suggest/implement methods as appropriate with the view to provide an opportunity to resolve and/or work through issues*
- *Seek involvement of various internal and external subject matter experts such as, but not limited to the Environmental Representative and/or the acoustic advisor (in relation to SSI_7400 projects only).*
- *Provide a proposal, developed by the parties which is facilitated by the mediator that clearly reflects a narrative that all parties agree upon in regard to the complaint mediation with due consideration to confidentiality requirements.*

In instances where a complainant remains unsatisfied, the Secretary will be advised.

The CCM will not act before:

- Sydney Metro has provided an initial response to an escalated complaint. The CCM will not consider issues such as:
 - Property acquisition where other dispute processes are provided for
 - Where clear Government policy and associated resolution processes are available
 - Where matters are not within the scope of the CSSI Project.

If the complainant states that the Department of Planning and Environment, NSW Environment Protection Authority, other TfNSW agencies and/or a local council have contributed to, or have a role in a particular complaint, the CCM may refer back to Sydney Metro for guidance and utilise their established interface pathways to liaise with either party.

5.2.1 Complaints related to compliance

Where a complaint relates to an actual or potential non-compliance with the planning approvals, the CCM will not be required to assess the compliance status. Sydney Metro will undertake its own investigation into the non-compliance, in accordance with program-wide procedures and this may involve the CCM. Should a non-compliance be identified, this would be communicated to Department of Planning Environment.

Additionally:

- Where there is a dispute between the CCM, Sydney Metro and third parties that a non-compliance is not being appropriately investigated or managed, Sydney Metro will communicate this to DPE
- Where there is contention that the running of the CCM process itself is non-compliant, Sydney Metro will also investigate this and advise DPE accordingly.

DPE may undertake its own investigation at its discretion on the above. Where DPE receive notice from a third party of a potential non-compliance, DPE may communicate this to Sydney Metro for its investigation.

5.2.2 Escalating to the Retail Advisory/Support Panel

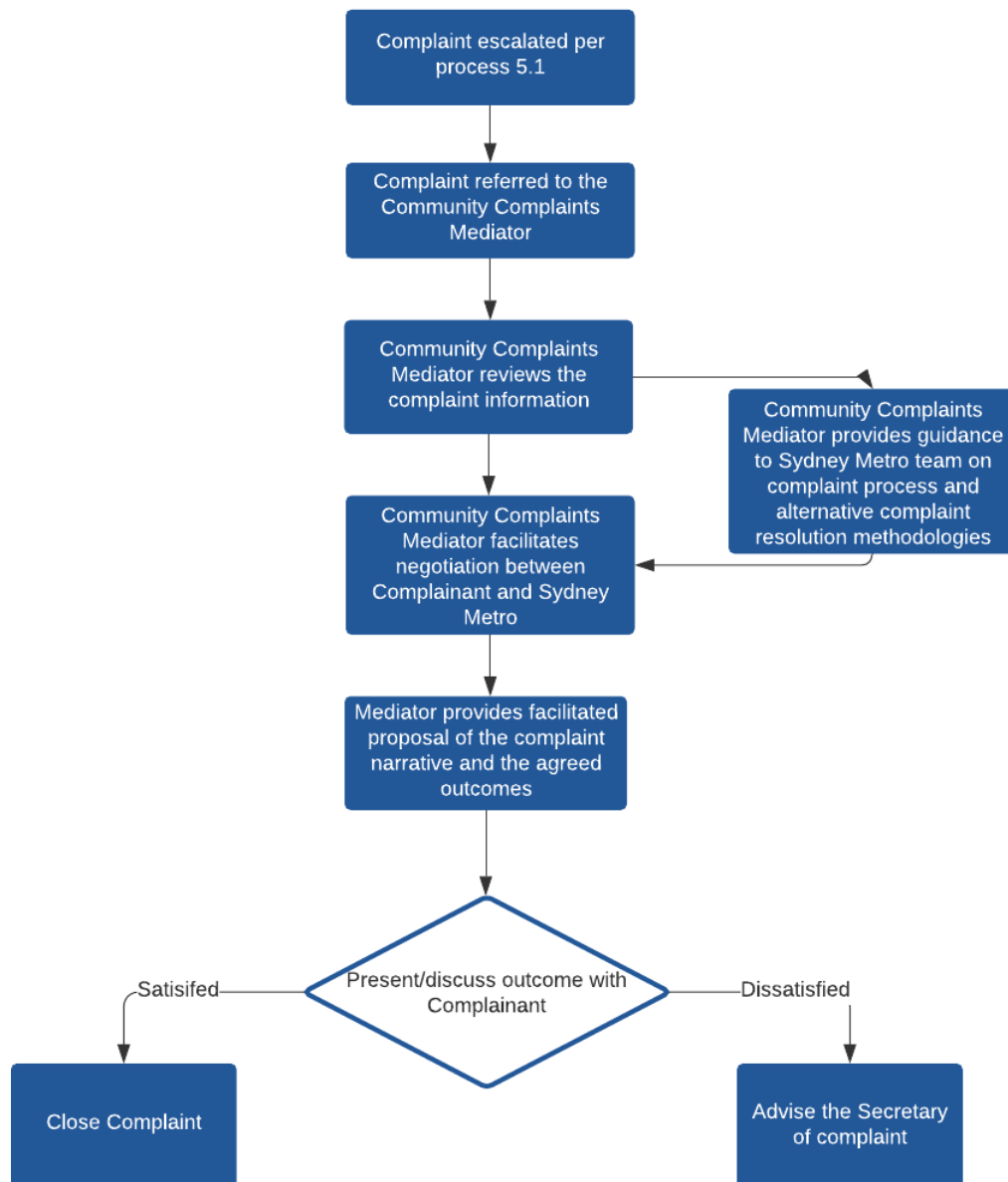
This Small Business Owners Support Program (SBOSP) describes the approach Sydney Metro will take to provide assistance to small business owners located within 50 metres of, and adversely impacted by, the construction of Sydney Metro City & Southwest.

Where a complaint has been received from a small business, Sydney Metro may request advice from the Retail Advisory/Support Panel to assist with the resolution of small business-related complaints.

This step precedes any involvement by the CCM.

5.2.3 How to refer a complaint to the Community Complaints Mediator

Community Complaints Mediator Escalation



6 Complaints Register

In accordance with project planning approvals, all complaints are recorded within a complaint register. For the purposes of Sydney Metro, complaints are recorded on the Consultation Manager database. The Complaints Register will be provided to the Secretary upon request, within the timeframe stated in the request.

6.1 Complaint identification number

A unique identification number should be assigned to each new complaint to help track the complaint in Consultation Manager. The complaint identification number is created using the date (Year/Month/Day) and first four letters of the complainant's surname (or 'ANON' where the stakeholder does not want their contact details recorded).

For example, this is the complaint identification number for a complaint from 'Smith' on the 22 October 2016.

1	6	1	0	2	2	S	M	I	T
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6.2 Consultation Manager

All complaints must be recorded in Consultation Manager in accordance with the Consultation Manager data entry procedure. This is necessary to enable management of the complaint and monitoring of response times. Contractors should use the template provided by Sydney Metro for data entry into Consultation Manager.

7 Reporting on complaints

7.1 Daily reporting to Sydney Metro

Contractors are required to report daily on complaints, providing complaint details for the 24hour period by 4pm weekdays. A daily complaint report will then be issued to a range of Government and Project related representatives. Sydney Metro will provide Contractors with advice and guidance as to the required content of daily reporting.

7.2 Reporting to the NSW EPA

Contractors are required to report daily on complaints received to the NSW Environment Protection Authority. Details of reporting requirements are outlined in the individual contractors Environment Protection Licences.

Sydney Trains will report annually to the NSW EPA and include any relevant Sydney Metro information of its contractors who have worked under the Sydney Trains Environment Protection Licence during the reporting period.

7.3 Monthly reporting to Sydney Metro

All complaints should be reported on a monthly basis to Sydney Metro. Sydney Metro will provide Contractors with details of the minimum reporting requirements.