

Reapit Payment Solutions Pty Ltd

TrustIQ Complaint Handling Policy

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These materials have been adapted for use by Reapit Payment Solutions Pty Ltd in the context of its business operations.

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1. POLICY STATEMENT

Reapit Payment Solutions Pty Ltd is committed to maintaining a fair, transparent and accessible complaints management process for customers using its services, including TrustIQ.

We welcome feedback from our customers and the community and recognise the importance of resolving complaints promptly, fairly and efficiently. Customers have the right to lodge a complaint or appeal a decision, without fear of disadvantage, and to have their concerns considered impartially and respectfully.

Reapit Payment Solutions Pty Ltd is committed to handling complaints in accordance with applicable legal and regulatory requirements, including the [Centrepay policy, terms and guides](#). Complaints will be managed confidentially and in a manner that protects the privacy of all parties involved.

The intent of this policy is to communicate and document a complaints and appeals management process that:

- provides a means for receiving complaints or feedback
- provides accessible and straightforward channels for customers to make complaints
- is easily accessed and practical
- is understood by our customers and other stakeholders
- ensures complaints are acknowledged, assessed, and resolved in a timely and consistent manner
- supports fair and impartial investigation and decision-making
- keeps customers informed throughout the complaints process
- enables escalation to Services Australia or other relevant external bodies where required
- supports continuous improvement by monitoring complaints and identifying trends or systemic issues
- provides for a fair, equitable and timely response
- complies with regulatory and legislative requirements.

2. DEFINITIONS

"Complaint" - an expression of dissatisfaction made to or about our business regarding our staff, services or products that warrants response or resolution, including any concerns relating to the use of Centrepay services.

"Complainant" - the person or entity that makes a complaint.

"Escalation" - the process of referring complaints to other persons for additional management action, including referral to senior management or external bodies where appropriate.

3. PRINCIPLES

The following principles will guide our organisation and commitment for managing customer complaints. We will:

- ensure our customers are encouraged to raise concerns about the service or product they are provided
- accept all complaints from customers, suppliers, other stakeholders and members of our community
- recognise the importance of complaints that are submitted to us
- ensure confidentiality of all parties is maintained throughout the process
- provide support to employee complainants
- commit to the resolution of complaints in a way that satisfies all parties
- endeavour to manage complaints in a timely manner, including aiming to resolve complaints within 20 business days where practicable
- maintain communications with all parties during the process
- provide employees with training on this policy and procedure
- provide awareness of escalation options if required, including the option to escalate complaints to Services Australia or other relevant external bodies where appropriate

- ensure complainants are not disadvantaged by submitting a complaint under this process, and that complaints are handled fairly, impartially, and without discrimination or detriment
- ensure management reviews include complaints data to identify improvement opportunities
- continually monitor and improve the complaints management system, including maintaining appropriate records of complaints in accordance with regulatory requirements.

4. PROCESS

4.1. Information for customers

The complaints and appeals process for services provided by Reapit Payment Solutions Pty Ltd, including TrustIQ, will be documented in a publicly available policy on our website, and will be made available to customers upon request and when providing our services.

All customers will be informed of our complaints management process as required under applicable regulatory and operational requirements, including at the time of onboarding or when entering into a Centrepay arrangement.

We will advise potential complainants:

- how to submit a complaint
- who the contact person is at our organisation
- how we will deal with a complaint
- how we will communicate the outcome of a complaint
- how they can access a copy of this policy (including via our website or upon request)
- what information they should provide to assist us in investigating and resolving a complaint
- the expected timeframes for acknowledging and resolving a complaint.

4.2. Training procedures

Employees will receive training on complaints management processes during their induction and as part of ongoing training to ensure awareness of their obligations under this policy and relevant regulatory requirements (including Centrepay requirements).

Managers will receive training in complaints management and resolution to: support customers and others through the complaints process; respond to complaints appropriately and empathetically; and ensure complaints are handled fairly, consistently and in accordance with this policy.

4.3. Making a complaint

Complaints may be made in writing or verbally to:

- the employee dealt with at the time
- a manager or supervisor of that employee
- the senior manager of that department/area
- a director
- or an external body such as the Office of Fair Trading QLD, the Administrative Appeals Tribunal, or Services Australia in relation to Centrepay matters.

Complaints may be made through the following channels:

- submitting a completed Complaints and Appeals Form (available as **Annexure A** to this policy or on request) – via email, by post, by hand, or by providing equivalent information in writing. The Complaints and Appeals Form is also available in hard copy at our office and on our website, or it can be provided upon request

- sending written complaints to Sales Support Team, Reapit Payment Solutions Pty Ltd, North Tower, Level 4/339 Coronation Drive, Milton QLD 4064 and / or trustiqsupportanz@reapit.com A director or nominated senior manager will be responsible for receiving this correspondence and directing it to the appropriate person
- calling 1300 131 311
- submitting a complaint via our website at www.reapit.com.au

When making a complaint, customers should provide sufficient information to assist us in investigating and resolving the matter, including (where available):

- their name and contact details
- the date or dates of the relevant issue
- details of the complaint, including any relevant amounts, transactions or interactions
- any supporting documentation or reference numbers

Customers may appoint an authorised representative to lodge a complaint on their behalf. Where this occurs, we may require confirmation of the representative's authority to act.

If the complaint is about an employee, the complaint will normally be dealt with by a director or HR Manager.

4.4. Lodging an appeal

Complainants may lodge an appeal if they disagree with a decision made by the organisation, or by an employee.

An appeal should be made in writing using the Complaints and Appeals Form (available as Annexure A to this policy on our website or on request), or by providing equivalent information in writing and submitted to a director or a nominated senior manager.

The appeal will be reviewed by an appropriately authorised person who, where practicable, was not directly involved in the original decision.

4.5. Process for complaints and appeals management

Where a complaint (no matter what format) is made, the employee who first receives that complaint is responsible for:

1. Receiving the complaint by:

- listening to the complainant, acknowledging the concern, and advising of our complaints management process
- depending on the type and severity of the complaint, either discussing with the complainant an agreed upon resolution (for smaller matters) or referring the complaint to a manager/supervisor for further investigation and action

Where a complaint cannot be resolved at step 1, the complaints manager becomes responsible for all further steps:

2. Processing the complaint by:

- updating the complaints register
- communicating with the complainant, including acknowledging receipt of the complaint within a reasonable timeframe

3. Investigating the complaint or appeal by:

- examining information relevant to the complaint
- investigating the complaint and determining a response
- communicating with the complainant about the determination and outcome of the complaint and next steps for resolution
- resolving the complaint in a timely manner and, if delays occur, advising the complainant accordingly

4. Responding to and resolving the complaint by:

- Making a decision, or referring the complaint to the appropriate person(s) for a decision, within a reasonable timeframe, and aiming to resolve the complaint within 20 business days where practicable
- informing the complainant of the outcome and the reasons for any decisions made (and if one was made, what will be done to resolve the complaint)
- resolving the complaint and communicating to the complainant how the complaint has been resolved; or, if no further action can be taken, the reasons for this
- informing the complainant of any options for further action if required
- if an apology is in order, ensuring that the appropriate person makes the apology and informs the complainant what the organisation intends to do to avoid further grievance

5. Reviewing the complaint:

- If the complainant is not satisfied with the investigation and proposed resolution of their complaint or appeal, they may request a further review. The complaint must then be referred to a director or a nominated senior manager for the review as requested.

6. Referring the complaint to an external procedure

- If a complaint is serious, repeated, or remains unresolved, Reapit Payment Solutions Pty Ltd may notify or refer the complaint to Services Australia, based on the nature and circumstances of the complaint. Where such notification or referral occurs, this will be completed within 5 business days
- If a director has reviewed the complaint and the complainant is still not satisfied, they may escalate the complaint to an external body, including Services Australia, the relevant ombudsman, or other applicable consumer protection agency

4.6. Complaints involving specific staff members

Responsibility for resolving complaints or disputes involving staff members is delegated to a director or the HR Manager, or another appropriately senior and independent manager, as determined by the nature of the complaint.

Internal complaints made by one staff member about another will be handled in accordance with the Reapit Australia Grievance Resolution Policy.

External complaints by customers or stakeholders about a staff member will be managed by a director or a nominated senior manager, who will:

- notify the staff member of the complaint and its nature
- investigate the complaint and interview persons involved
- take appropriate steps to resolve the matter in accordance with this policy
- take other appropriate action as necessary

Any disciplinary action arising from a complaint against a staff member will be taken in accordance with the procedures contained in the applicable Reapit disciplinary policies and procedures.

4.7. Cooperation in external investigations

If any person makes a complaint about Reapit Payment Solutions Pty Ltd to an external body (including police, Ombudsman, Office of Fair Trading or Civil Administrative Tribunal), or to Services Australia in relation to Centrepay matters, a director or a nominated senior manager will be responsible for liaising with the body responsible for investigating the issue.

Reapit Payment Solutions Pty Ltd will fully cooperate in any investigation which may take place. This includes participating in early resolution, conciliation, and/or reporting to the body about resolution and corrective actions if required.

4.8. Record keeping

After the complaint has been made, a complaints register will be maintained by the business and kept for a minimum of 7 years, in accordance with applicable regulatory requirements. The register will be maintained within our records management system and will record the following for each complaint or appeal:

- name and contact details of the complainant
- details of the complaint
- actions taken
- date submitted and date closed

All correspondence will be maintained in our records management system. Information will be treated as confidential and access restricted and handled in accordance with applicable privacy obligations.

4.9. Continuous improvement of the complaints management system

The complaints management policy and process will be reviewed and evaluated on a periodic basis, and at least annually, to ensure it remains effective and appropriate. This will include:

- review of the complaints management system
- analysis of complaints data to identify trends, risks and areas for improvement
- implementing corrective actions and other improvement measures identified through the complaints process
- forward plans to ensure continual improvement, where appropriate

5. ADMINISTRATION AND REVIEW

This policy is administered by Reapit Payment Solutions Pty Ltd and will be reviewed periodically, and at least annually or as required to ensure it remains effective and aligned with applicable regulatory requirements (including Centrepay requirements).

6. QUESTIONS

Any questions regarding this policy may be directed to Reapit Payment Solutions Pty Ltd using the contact details set out in this policy.

Annexure A – Complaints and Appeals Form
Reapit Payment Solutions Pty Ltd

TrustIQ Complaints and Appeals

We are committed to resolving complaints fairly and promptly. You may use this form to submit a complaint or appeal. Alternatively, you may provide the same information in any written format.

DATE OF PROVISION / RECEIPT	
Your details	
Full name:	
Contact number:	
E-mail address:	
Postal address (optional):	
Preferred method of contact: Phone / E-mail / Post	
Are you making this complaint on behalf of someone else?	
No ☐	Yes ☐
If yes, please provide details:	
Complaint or appeal details	
New complaint / appeal	Yes ☐ No ☐
Reference number (if known):	
Date(s) of issue:	
Description:	
Supporting information	
Attach any supporting documents (optional):	
Outcome sought	
Please describe the desired resolution:	
Declaration	
I confirm that the information provided is true and correct.	
Name:	
Signature:	
Date:	