

Onshore Gas Non-compliance Hotline Operational Protocol

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1. Introduction

1.1. What is the Onshore Gas Non-Compliance Hotline

The Onshore Gas Non-Compliance Hotline is a service which allows concerned citizens to report on any non-compliance issues in relation to the Northern Territory (NT) onshore gas industry and provides for the ability to make a report anonymously.

1.2. Who manages the hotline

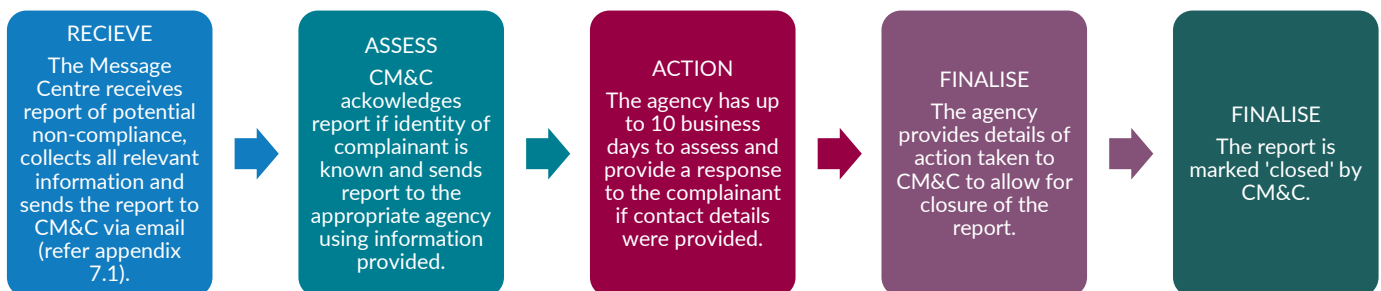
The Message Centre takes all calls for the hotline, with a call centre format. The Message Centre is based in Melbourne, Victoria, and has a contract with the NT Government. Upon taking a call reporting a potential non-compliance issue, an operator asks appropriate questions so that the NT Government can act on the report. The operator logs the call in the system and an email is then sent to the NT Government Hydraulic Fracturing email address and a text to the Executive Director – Strategic Policy in the Department of the Chief Minister and Cabinet (CM&C) alerting to the non-compliance report being made. Refer to appendix 7.1 – NT Onshore Gas Non-Compliance Hotline script.

1.3. How are calls directed for action

When a report of potential non-compliance is received by the Message Centre and then passed on to CM&C, it is assessed based on its subject matter and then forwarded on to the appropriate NT Government agency or relevant regulator for action. If the identity of the concerned citizen is known, an acknowledgement email is also sent confirming the matter is being dealt with.

1.4. What is the process for a report of non-compliance

The flowchart below and further detail outlined in section 5.4 provides a simple explanation of management of a report of potential non-compliance.



2. Objectives of the hotline

The hotline has been established following the NT Government lifting the moratorium no hydraulic fracturing in the NT after accepting all 135 recommendations of the final report of the *Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*.

The establishment of the hotline fulfils the requirements of one of these recommendations (recommendation 14.27).

The hotline provides one central location for anyone wishing to report potential non-compliance of the NT onshore gas industry, with the assurance that the report will be dealt with appropriately and anonymously.

3. What types of reports does the hotline deal with

There are a number of different types of reports the Hotline deals with. It's important to identify the type of report your agency receives as this will allow for improved performance reviews of the hotline.

3.1. Enquiries

The hotline does not take general enquiries and callers will be directed to the Hydraulic Fracturing email address and the implementation website as per the hotline script in appendix 7.1.

3.2. Reported incident

A reported incident occurs when the Message Centre is advised that there is an alleged or reported non-compliance and will be directed to the relevant agency and/or regulator by CM&C as outlined in sections 1.3 and 1.4.

4. How do we do our business

4.1. Good recording keeping

Records tell us what, where and when something was done and how and why a decision was made. Records also tell us who was involved and under what authority. Records provide evidence of communication and actions taken and promote accountability and transparency.

The Message Centre is responsible for making and keeping accurate records for all reported incidents received, and communicating reports immediately to CM&C and on a weekly basis through a Call Activity Report. Records of reported incidents must be maintained in the NT Government's approved electronic database and recording systems.

At present CM&C will maintain records of reports through a spreadsheet. CM&C should email the relevant agency with the report within 1 business day for investigation. Agencies should email CM&C within 10 business days with action taken to investigate the incident. When closing off a report, the agency should provide:

- whether the report was found to be compliant or non-compliant
- the type of report received (nuisance complaint, notification or incident)
- what the risk level of the report was
- if the reporter was contacted at the resolution of the report, and details of interaction if they were contacted
- date the report was finalised and closed.

5. Operation of the hotline

5.1. How customers contact us

The hotline can be contacted on 1800 413 889. This is a free-to-call number. When a call to lodge a report is received, the caller is asked a series of questions so that the report can be adequately investigated. Callers can remain anonymous but will be asked for their contact details in case further information is

required to adequately investigate the report. Appendix 7.1 provides detail on the script used by the Message Centre in taking all calls.

5.2. Normal hours of operation

The hotline is operational 24 hours a day, 7 days a week.

5.3. Resources required

To ensure a service that can be accessed conveniently is provided, the Hotline is managed by a Message Centre, who answers all incoming reports of potential non-compliance. At present, the Message Centre is contracted to answer all calls live and an employee talks the report through with the caller, asking necessary questions to obtain information required for agencies to act on reports. At present, calls are not recorded. The Message Centre sends all reports to CM&C immediately after the report has been made, and provides a weekly Call Activity Report documenting each call received.

5.4. Processing reports

Reported incidents are processed by the Message Centre, CM&C and agencies via a 4-step process: - 1. Receive, 2. Assess, 3. Action and 4. Finalise (RAAF).

The RAAF process is presented in figure 2 below as a workflow and in detail in the following sections.

5.4.1. Receive

When receiving a report, it's important to gather as much information as possible from the person making the complaint, notification or reporting the incident. The following is the information that is generally required for a reported incident to ensure it is able to be properly assessed, actioned and finalised.

5.4.1.1. Complainant details (noting anonymous reporting is permitted)

1. Name, address, phone number and email address.
2. Time and date complaint made.

5.4.1.2. Situation

1. Who is the alleged source/cause of the problem:
 - name, address, phone number/s, email address
 - government entity
 - company name.
2. What is the current situation:
 - alleged or potential non-compliance
 - suspected/alleged degree of harm including details of what has occurred
 - measures in place to mitigate or reduce harm (is site isolated, is incident contained, what is plan for reducing further incidences)
 - evidence that currently exists that is likely to disappear.
3. When did incident occur:

- time and date
 - is it occurring now, is it ongoing, is it intermittent and has/when did it stop.
4. Where did the incident occur:
- location of incident (address and/or lot and plan details and/or tenure number)
 - for nuisance - where is the complainant affected.
5. How did the situation occur:
- what was the cause of the release
 - is the situation wilful.
6. Why does the person believe there is a problem:
- evidence of harm
 - evidence to link harm to alleged source.

A good method of receiving information is to use the TEDS system - Tell Me, Explain to Me, Describe to Me and Show Me. Using TEDS promotes the asking of open-ended questions and will elicit responses that are more extensive and are more likely to be accurate.

Tell me

In the first instance, the person reporting the incident is encouraged to tell the operator the details of the report eg. "tell me what the issue is".

Explain to me

If more detail is required of specific details of one element of what has been told, the person reporting can be asked to explain those elements in more detail - eg. "explain to me how the contaminants were released".

Describe to me

More details of equipment, contaminants, locations/environments, effects involved can be gained by asking the person reporting to describe certain aspects of the event - eg. "describe to me the colour of the water and extent of the pollution".

Show me

Often a request to show what occurred can produce physical evidence. Evidence may include photos or videos taken - eg. "show me the photographs you took of the sludge by emailing to the hotline".

5.4.2. Assessment of calls

After receiving a report, the Message Centre staff will document the report and provide this to CM&C, who will then send the report to the relevant agency for assessment.

If CM&C receives a report during business hours, 8am to 4:30pm Monday to Friday, excluding public holidays, CM&C will forward the report onto the relevant agency as soon as possible.

All reports will be forwarded to the relevant agency within 24 hours of receipt, including outside of business hours. Agencies can nominate a separate contact for reports to be sent to outside of business hours.

It's expected that agencies confirm the receipt of a report within 24 hours of it being sent. If the report has not gone to the appropriate agency, the agency must communicate this to CM&C within 48 hours, and include any recommendation of which agency the report should go to if known. CM&C will then send the report on to the appropriate agency.

CM&C will send the report to multiple agencies if it's unclear who is responsible for the subject matter. If this occurs, all of these agencies should respond to indicate the email has been received and state whether or not they can act on the matter. If there is agency cross over in managing the report, agencies will work together to appropriately assess the report within 5 business days.

If CM&C receives a report which it deems should be assessed immediately, it will call the relevant agency contact if it's received during business hours, or send a text message to the relevant agency contact if it's received outside of business hours.

5.4.3. Actions

The agency which receives a report will have its own processes in place for dealing with the report appropriately. This document is a whole-of-government operational protocol for the Onshore Gas Non-compliance Hotline and does not seek to give agencies guidance on how they respond to individual reports.

It's expected that agencies contact CM&C with the outcome of the report within no more than 10 business days.

5.4.4. Finalise

All reports will be finalised by agencies providing CM&C with information on the outcome of the report. This should include whether the report was found to be compliant or non-compliant, the type of report (non-compliance report, nuisance complaint or incident), if the reporter was contacted regarding the outcome of the report and when the report was finalised or closed.