Solar Accreditation Australia

Complaints Management Policy

Version: 2.0

Approval Date: 12 October 2026

Board Meeting Number: BM2610

Review cycle: 2 years

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1. Purpose

This Policy establishes how Solar Accreditation Australia Limited (SAA) receives, assesses, resolves and learns from complaints.

It supports fair, accessible and timely complaint handling and helps SAA identify opportunities to improve its services, systems, processes and administration of the Accreditation Scheme.

This Policy has been developed with reference to AS 10002:2022, Guidelines for complaint management in organisations.

2. Scope

2.1 Matters within the scope of this Policy

This Policy applies to complaints about:

2.1.1 SAA's services and administration

SAA's services and administration including:

(a) delays or errors in processing applications, renewals, CPD records, payments or other matters;
(b) customer service, communications or information provided by SAA;
(c) SAA's systems, website, portal or forms;
(d) payments or refunds;
(e) the conduct of an SAA employee, contractor or representative pertaining to matters that are within scope of this policy; and
(f) the way SAA has handled an enquiry, complaint or other process.

2.1.2 An SAA-accredited individual

An SAA accredited individual including:

(a) the quality or safety of design or installation work;
(b) compliance with applicable technical requirements;
(c) professional conduct or behaviour;
(d) dealings with a consumer, including the handling of a consumer complaint;
(e) the use or representation of SAA accreditation; and
(f) a possible breach of the Accreditation Agreement or Scheme Rules.

2.1.3 A registered CPD provider or recognised learning activity

A registered CPD provider or recognised learning activity including:

(a) the quality, accuracy, currency or relevance of learning content;
(b) the delivery, accessibility or administration of a learning activity;
(c) assessments, completion requirements or learning outcomes;
(d) the conduct of a provider, trainer, facilitator or assessor;

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(e) participant support or information provided by a CPD provider; and
(f) a possible failure to comply with SAA's CPD provider or learning activity requirements.

2.2 Matters outside the scope of this Policy

This Policy does not apply to:

2.2.1 Review or appeal of a compliance decision

This Policy does not apply where an accredited individual seeks review or appeal of a compliance or enforcement decision made by SAA in relation to their accreditation. Any review or appeal must be made under the process set out in the Compliance and Enforcement Rules.

2.2.2 Matters outside SAA's authority

This Policy does not apply to complaints concerning individuals, organisations, products, services or activities that are not subject to SAA's accreditation such as complaints about equipment or products. Where reasonably practicable, SAA will direct the complainant to an appropriate organisation, regulator or dispute resolution pathway.

2.2.3 Retailer, sales or marketing complaints

SAA does not investigate consumer complaints about solar retailers, companies, sales practices or marketing. SAA only investigates consumer complaints concerning the installation practices or conduct of an identifiable SAA-accredited installer or designer.

Where a consumer complaint falls outside SAA's scope, SAA will endeavour to identify an appropriate organisation or complaint pathway that may assist the consumer. SAA's website provides additional information on organisations that may be able to assist where SAA is unable to manage a complaint.

2.2.4 Whistleblower disclosures

Reports of suspected misconduct, fraud, corruption, breaches of law or other matters that meet the definition of a protected disclosure under the Whistleblower Policy. These should be managed under the Whistleblower Policy rather than the Complaints Policy.

2.2.5 Employment and workplace grievances

Complaints from SAA employees, contractors or job applicants relating to employment matters, recruitment, bullying, harassment, discrimination, disciplinary action, remuneration or workplace conditions. These should be managed under the relevant HR or workplace policies rather than the Complaints Policy.

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3. Distinguishing complaints from feedback

A complaint is an expression of dissatisfaction about a specific matter within the scope of this Policy where the person expects SAA to respond, resolve the matter or take action.

Feedback is a comment, compliment, observation or suggestion provided for SAA's consideration where the person does not expect SAA to resolve a specific matter or provide an individual outcome.

When a submission is received, SAA will determine whether it is a complaint or feedback based on the substance of the submission and whether a response, resolution or action is reasonably expected.

Complaints must be submitted using the relevant online complaint form (refer to section on lodging a complaint). Where SAA receives a submission through another channel and determines that it is a complaint, the complainant will be directed to complete the online complaint form before the complaint is assessed or managed under this Policy, unless SAA determines that an alternative arrangement is reasonably required due to accessibility needs or other exceptional circumstances.

Complaints will be managed in accordance with the complaint management process set out in this Policy.

Feedback may be provided through any channel made available by SAA, including surveys, correspondence, stakeholder engagement activities or website feedback mechanisms. Feedback will be recorded and considered as part of SAA's monitoring, reporting and continuous improvement activities. Feedback does not follow the complaint management process or timeframes set out in this Policy, and SAA may not respond individually to every item of feedback.

Where the distinction between a complaint and feedback is unclear, SAA may contact the person to clarify their expectations.

4. Guiding principles

SAA is committed to the following principles in managing complaints:

Visibility: Information about how to make a complaint will be clearly communicated and publicly available.

Accessibility: The complaint process will be accessible and assistance will be provided where reasonably required.

Responsiveness: Complaints will be acknowledged and progressed promptly and within the timeframes set out in this Policy.

Objectivity and fairness: Complaints will be assessed impartially, having regard to the information provided by the complainant and other relevant parties.

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Procedural fairness: A person or organisation that is the subject of a complaint will be given a reasonable opportunity to respond to relevant matters before an adverse finding is made.

Confidentiality: Complaint information and the privacy of all parties will be protected, subject to any disclosure reasonably required to assess, investigate or resolve the complaint, or otherwise authorised or required by law.

Accountability: Roles and responsibilities for assessing, resolving, escalating, recording and reporting complaints will be clearly assigned.

Continuous improvement: Complaint information will be used to identify improvements to SAA's services, systems, processes, communications, CPD Program and administration of the Accreditation Scheme.

5. Complaint management process

5.1 Lodging a complaint

Complaints must be made in writing using the relevant online complaint form available on SAA's website.

The complaint should clearly identify:

(a) the person, service, process, learning activity or other matter the complaint concerns;
(b) what occurred and when;
(c) why the complainant is dissatisfied;
(d) the outcome the complainant is seeking; and
(e) any supporting information reasonably available to the complainant.

Where a complaint concerns an accredited individual, the complainant should provide sufficient information to identify the individual and the work or conduct concerned.

Where a complaint concerns a registered CPD provider or recognised learning activity, the complainant should identify the provider, course or learning activity and provide relevant dates and supporting information.

SAA may request further information where it is reasonably required to assess or progress the complaint. A delay in providing requested information may affect SAA's ability to resolve the complaint.

An SAA employee who receives a complaint through another channel must direct the complainant to the relevant online form or otherwise ensure the complaint is recorded through SAA's approved process.

5.1.1 Complaint submission by a representative

A complaint may be submitted by the person directly affected or by a representative. Where a representative submits the complaint, the person directly affected must provide written authority confirming that the representative is authorised to submit and discuss the complaint on their behalf.

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5.1.2 Complaint eligibility limit

SAA may apply complaint eligibility or assessment limits established under the Accreditation Scheme, applicable Scheme Rules or published complaint processes. This includes time limits.

Where a complaint falls outside an applicable limit, SAA will explain why it cannot be assessed and, where appropriate, identify another available pathway.

SAA currently applies a one-year complaint eligibility limit. SAA will not generally assess complaints relating to conduct, decisions, actions or events that occurred more than one year before the complaint was lodged.

5.1.3 Minimum information and evidence requirements

Some complaint types have minimum information or evidence requirements. These may include identifying the relevant SAA accredited person, providing supporting evidence or obtaining an independent inspection report. SAA is unable to examine complaints that do not provide the minimum required information or evidence.

SAA may request further information where it is reasonably required to assess or progress a complaint. The complainant will be given a reasonable timeframe to provide it. If the information is not provided within three months of the request, SAA may close the complaint and advise the complainant in writing, unless an extension has been agreed due to exceptional circumstances.

5.2 Professional communication

SAA expects complainants and other parties involved in a complaint to communicate respectfully and cooperate with reasonable requests for information.

SAA may require offensive, abusive, threatening or discriminatory communication to be resubmitted in appropriate terms. SAA may also place reasonable limits on the manner and frequency of communication where necessary to protect its employees, contractors or other parties.

Where the complainant is an accredited individual and their conduct may breach the Code of Conduct for Accredited Persons, the conduct may be referred to SAA's Compliance Team for assessment and compliance action where appropriate. The Code requires accredited individuals to behave courteously and respectfully towards SAA and its employees and prohibits threatening, abusive, discriminatory, harassing, intimidating, retaliatory or otherwise inappropriate conduct.

Any concerns about the accredited individual's conduct will be assessed separately by SAA's Compliance Team. This will not prevent SAA from continuing to assess the complaint on its merits.

5.3 Receipt, recording and acknowledgement

Accreditation Officers will receive complaints and ensure they are recorded in SAA's system.

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The complaint record must include the date received, complaint category, relevant parties, supporting information, actions taken, applicable timeframes and outcome.

SAA will acknowledge a complaint within five (5) business days of receipt. The acknowledgement will confirm receipt and advise the complainant if further information is required.

Initial assessment and resolution

An Accreditation Officer will undertake an initial assessment to determine:

(a) whether the complaint falls within the scope of this Policy;
(b) whether the complaint can be resolved without investigation;
(c) whether any immediate action is required; and
(d) whether the information indicates a possible breach requiring separate compliance assessment.

Where a complaint can be resolved without investigation, the Accreditation Officer will determine the appropriate outcome, advise the complainant and close the complaint in SAA's systems.

5.3.1 Resolution timeframes

SAA will resolve complaints that do not require investigation within ten (10) business days after receiving the information reasonably required for the complaint to progress.

5.3.2 Out of scope complaints

Where a complaint falls outside SAA's scope, SAA will advise the complainant and, where reasonably practicable, identify an appropriate organisation or complaint pathway.

5.4 Complaints requiring investigation

Where a complaint requires investigation or further enquiries, it will be referred to the relevant business unit:

(a) Scheme Operations, where the complaint concerns an accredited individual;
(b) Standards and Development, where the complaint concerns a registered CPD provider or recognised learning activity; or
(c) Communications and Engagement, where the complaint concerns SAA's services, systems, processes, communications or general administration.

Where a complaint involves more than one business unit, SAA will nominate a lead business unit to coordinate the investigation.

The relevant business unit will assign the complaint to an officer with the appropriate knowledge and authority to investigate the matter. An officer who is the subject of the complaint, whose conduct is being questioned or who was directly responsible for the matter complained about must not investigate or decide the complaint.

The investigating officer will gather and consider the information reasonably required to determine the complaint. This may include information provided by the complainant, relevant

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SAA records, information from the person or organisation concerned, technical or specialist advice, and information available from a regulator or another relevant party.

5.4.1 Opportunity to respond

The person or organisation concerned will be given a reasonable opportunity to respond to relevant matters before an adverse finding is made.

5.4.2 Confidentiality and privacy

Complaint information will be collected, used, stored and disclosed in accordance with SAA's Privacy Policy and applicable privacy requirements. The Privacy Policy permits disclosure for stated Scheme purposes, to authorised service providers and accreditation partners, where authorised by the individual, and where required, authorised or permitted by law.Disclosure with consent

SAA will handle complaints sensitively and limit access to complaint information to those who need it to assess, investigate, resolve or oversee the complaint.

SAA cannot guarantee that a complaint will remain confidential. In some cases, relevant information must be provided to the person or organisation concerned so that they understand the matters raised and have a reasonable opportunity to respond. This is also consistent with the procedural fairness requirements applying to complaints against accredited individuals.

Before disclosing complaint information to the person or organisation concerned, SAA will:

(a) explain what information it proposes to disclose and why;
(b) seek the complainant's written consent; and
(c) limit the disclosure to information reasonably necessary to manage the complaint.

Where a complainant does not consent to the disclosure of information reasonably required to assess or investigate the complaint, SAA may be unable to progress the complaint. SAA will explain this to the complainant before deciding whether to close the matter.

5.4.2.1 Disclosure without consent

SAA may disclose complaint information without the complainant's consent where the disclosure is required or authorised by law, necessary to address a serious safety or Scheme-integrity risk, or where the disclosure is made to a regulator, government body, law-enforcement body or professional adviser in accordance with SAA's legal and regulatory obligations.

Where reasonably practicable, SAA will remove or withhold information that is not relevant to the disclosure, including the complainant's identity where the complaint can be fairly managed without disclosing it.

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5.4.3 Resolution timeframes

SAA will use its best endeavours to complete its assessment and communicate the complaint outcome within twenty (20) business days after receiving the information reasonably required for the complaint to progress.

An exception applies to complaints involving technical assessment, detailed investigations, alleged breaches of the Code of Conduct for Accredited Persons, rectification activities or related compliance action. These complaints may not be capable of resolution within the timeframes set out in this Policy due to the time required to undertake technical assessment, gather and assess evidence, obtain information from relevant parties, complete rectification activities, determine appropriate compliance action or verify that required actions have been completed.

Where a complaint falls within this exception, SAA will advise the complainant and provide reasonable progress updates at appropriate intervals.

If, following assessment of the complaint, SAA determines that rectification, corrective action or other compliance action is required, the complaint will generally be taken to have been resolved on the date SAA communicates the outcome of the complaint and issues or communicates the relevant compliance requirements to the accredited individual [or registered provider].

Any rectification, corrective action, monitoring or enforcement activity arising from the complaint will thereafter be managed in accordance with the Compliance and Enforcement of Continuing Professional Development Rules.

SAA may keep the complaint administratively open in its systems while the relevant compliance process is undertaken and the required actions are completed and verified. This administrative status does not affect the date on which the complaint is taken to have been resolved for the purposes of SAA's service standards.

The complainant will be advised where a matter has been transferred for management under the Compliance and Enforcement Rules and will be provided with an appropriate contact point for future enquiries. SAA will generally continue to provide reasonable updates on the progress of the matter until the relevant compliance process has concluded.

5.4.4 Referral for compliance assessment

A complaint does not automatically result in compliance action.

Where information obtained through a complaint indicates a possible breach of an applicable scheme requirement, SAA may refer the matter for separate compliance assessment:

(a) possible breaches by an accredited individual will be referred to Scheme Operations; and
(b) possible breaches by a registered CPD provider or relating to a recognised learning activity will be referred to Standards and Development.

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The relevant business unit will determine whether compliance, corrective or other action is required under the applicable Scheme Rules, framework or agreement.

5.4.5 Consumer complaints about accredited individuals

Accredited individuals must address consumer complaints in a timely, professional and courteous manner and consider reasonable options for resolving them.

With the consumer's consent, SAA may give the accredited individual relevant details of the complaint, and an opportunity to respond to and address the consumer's concerns. SAA may take this step even where the available information is insufficient to determine whether there is a technical defect or breach of the Scheme Rules.

Under the Accreditation Agreement, the accredited individual must cooperate with SAA's reasonable requests for information or assistance and comply with any determination SAA makes about the complaint.

The complaint will remain open while the accredited individual is given a reasonable opportunity to respond and complete any agreed or required action. SAA will consider the response and any action taken before determining the outcome of the complaint.

If the accredited individual does not cooperate with SAA, respond within the required timeframe or make a reasonable attempt to address the complaint, SAA may refer the matter for compliance action under the Compliance and Enforcement Rules. Any compliance decision, and any review or appeal of that decision, will be managed under those Rules.

5.5 Outcome and closure

SAA will advise the complainant of the outcome in writing.

The written outcome will, where appropriate:

(a) identify the matters considered;
(b) explain the outcome and the reasons for it;
(c) outline any complaint-resolution action taken or proposed by SAA;
(d) identify any part of the matter referred to another SAA process or external organisation; and
(e) explain how the complainant may request an internal review of the complaint outcome (refer to section on process for requesting an internal review of a complaint outcome).

Where the complaint concerns another person or organisation, privacy, confidentiality, procedural fairness or legal requirements may limit the information SAA can provide about any action taken.

A complaint will be closed in SAA's system once the outcome has been communicated, any complaint-resolution actions have been completed, and the complaint record is complete, or where SAA determines that no further action can reasonably be taken.

Notwithstanding the above, where a complaint involves technical non-compliance, the complaint will generally remain open until SAA is satisfied that the required rectification has been completed or the rectification process has otherwise ended. The Technical Compliance

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Officer responsible for the matter will close the complaint once satisfactory evidence of rectification has been received.

6. Internal review of complaint outcomes

A complainant may request an internal review of a complaint outcome within twenty-one (21) calendar days of receiving the outcome notification.

An internal review under this Policy is limited to the manner in which the complaint was assessed, investigated or determined under this Policy. It does not replace, extend or create any right to review or appeal a compliance, enforcement, accreditation or other decision made under the Accreditation Scheme, Compliance and Enforcement Rules, Accreditation Agreement or any other Scheme requirement.

A request for internal review must be submitted in writing and must:

(a) identify the complaint outcome being reviewed;

(b) clearly explain the reasons the complainant considers the outcome should be reviewed;

(c) identify the grounds for review; and

(d) include any supporting information or evidence the complainant wishes SAA to consider.

SAA may request further information where the review request does not contain sufficient detail to enable assessment. SAA is not required to accept or commence a review until it has received the information reasonably required to assess the request.

SAA will only accept a review request where the complainant identifies:

(i) a material error in the original complaint assessment;

(ii) a failure to follow the requirements of this Policy; or

(iii) new information that was not reasonably available during the original complaint process.

SAA may decline a review request that does not identify a valid ground for review, does not contain sufficient information to support the request, repeats matters that have already been considered, or seeks review or appeal of a compliance, enforcement or accreditation decision that is outside the scope of this Policy.

Where an internal review request is accepted, the review will be conducted by a business unit that was not involved in the original assessment or determination and can act impartially.

The review outcome must be approved by the Chief Executive Officer before being communicated to the complainant. Where the complaint concerns the Chief Executive Officer, the review outcome must be approved by the Chair of the Board.

SAA will use its best endeavours to determine an internal review within twenty-eight (28) business days of receiving a fully compliant review request complete with all relevant information.

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The original complaint outcome remains in effect while the internal review is being undertaken unless SAA determines otherwise.

The internal review outcome is final and is not subject to any further review under this Policy.

7. Responsibilities

This policy applies to all SAA employees, contractors, managers, executives and directors who have responsibilities under this Policy or who are otherwise involved in receiving, assessing, investigating, reviewing, overseeing or resolving complaints.

7.1 Role Responsibilities

The following roles have specific responsibilities under this policy:

7.1.1 Accreditation Officers

Responsible for receiving, acknowledging, recording and initially assessing complaints. They may resolve complaints that do not require investigation and must refer complaints requiring investigation to the relevant business unit.

7.1.2 The relevant business unit

Responsible for investigating complaints referred to it, communicating the outcome and maintaining complete records in SAA's system.

7.1.3 Technical compliance officers

Responsible for investigating complaints involving technical non-compliance, overseeing any required rectification process, and closing the complaint once satisfied that rectification has been completed or the rectification process has otherwise ended.

7.1.4 The relevant Executive Manager

Responsible for overseeing complaints investigated by their business unit and undertaking or assigning any internal review.

7.1.5 The Executive Manager, Communications and Engagement

Responsible for oversight of complaint processes, timeframes, monitoring, reporting and continuous improvement of SAA services.

7.1.6 The Chief Executive Officer

Responsible for the overall management of SAA's complaints framework and considering complaints escalated under this Policy.

A complaint, that falls within the scope of this policy, about the Chief Executive Officer must be referred firstly to the Executive Manager Communications and Engagement who will work directly with the Chair of the SAA Board on the resolution process.

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7.2 Objectivity and impartiality

Anyone involved in receiving, managing, investigating, reviewing or overseeing a complaint must act fairly, impartially and professionally.

A person must disclose any actual, potential or perceived conflict of interest and must not manage or decide a complaint where their impartiality could reasonably be questioned. The complaint must be reassigned or appropriate independent oversight put in place.

No SAA employee, contractor, executive or director may improperly influence or interfere with the management, investigation, review or outcome of a complaint, regardless of their role, position, authority or responsibilities within SAA.

Improper influence or interference with a complaint process is a serious breach of this Policy. Any person found to have influenced, attempted to influence, obstructed or interfered with a complaint process may be removed from involvement in the matter and may be subject to disciplinary action or other action considered appropriate by SAA.

8. Documentation

All records related to the complaint, decisions, and communications should be documented at each stage by each responsible party.

Follow-up actions or systemic improvements should be considered to prevent recurrence.

9. Policy communication

This policy will be published on SAA's website.

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10. Related policies and other documents

- Accreditation Agreement
- Code of Conduct for Accredited Persons
- Compliance and Enforcement Rules
- Continuing Professional Development (CPD) Framework
- SAA CPD Provider Agreement
- Privacy Policy
- Conflict of Interest Policy (Employees)
- Code of Conduct (Employees)
- Delegations of Authority Policy and Delegations Matrix
- Information Security Policy

11. Revisions and version history

This policy will be reviewed at a minimum every 2 years, or when our approach to managing complaints changes.

Version no.	Description of changes	Pages affected	Approved by / Effective date	Implementation actions	Next Revision Due
0.1	Initial	All	Board 15 May 2025		May 2027
2.0	Major update to reflect new operating model and compliance and enforcement rules	All	BM2610 15 October 2026	Employee training. Publish to Policy Register Publish to SAA website	October 2028

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