



**GEORGES
RIVER
COUNCIL**

**CUSTOMER FEEDBACK
AND COMPLAINTS
MANAGEMENT POLICY**

July 2019

POLICY ADMINISTRATION

Dates	Policy approved 19/07/2019 (Version 4) Policy takes effect upon its approval. Policy is due for review December 2021.
Approved by	Executive on 19/07/2019 (Version 4)
Exhibition Period	N/A
Policy Owner	Manager Customer Experience and Events, Community and Culture
Related Documents	Customer Feedback and Complaints Management Procedures (in progress)
Appendices	Appendix A - Complaints covered by legislation or other Council policies
References & Legislation	<ul style="list-style-type: none"> • <i>Government Information Public Access (GIPA) Act 2009</i> • <i>Privacy and Personal Information Protection Act (PPIPA) 1998</i> • <i>NSW State Records Act 1998</i> • <i>NSW Local Government Act 1993</i> • <i>NSW Ombudsman's Office Three Tier Approach to Complaint Handling</i> • <i>NSW Ombudsman's Model Policy and Procedures on Managing Unreasonable Complainant Conduct</i> • <i>NSW Ombudsman's Effective complaint handling guidelines, 3rd Edition, February 2017</i>
Document Identifier	Policy #: Pol-016.004 Doc #: D17/117801
Breaches of Policy	Breaches of any policy will be dealt with and responded to as per adopted code and/or relevant legislations and regulations.
Privacy	All documents and information obtained in relation to the implementation of this policy will be kept in accordance with the <i>NSW State Records Act 1998</i> , <i>Georges River Council's Records and Information Management Policy</i> and the <i>Privacy and Personal Information Protection Act 1998</i> .

PURPOSE

This policy establishes a focused Customer Feedback and Complaints Management Framework to enable the handling of all forms of feedback in a consistent, fair and professional manner.

Georges River Council (Council) is committed to providing excellent customer service and maintaining a healthy relationship with our customers. Acknowledging and actioning feedback provides an opportunity for Council to support its mission to become a leading, people-focused organisation delivering outstanding results for our community and city.

SCOPE

This Policy applies to all customer feedback including compliments, suggestions, comments and complaints lodged with Council.

When managing a complaint, if it becomes apparent that the complaint involves issues covered under legislation or another Council policy, then the procedures or statutory requirements for the management of that type of issue prevail. A complete list of complaints covered under legislation or other Council policies is attached in Appendix A.

DEFINITION OF TERMS

Term	Meaning
<i>Complaint</i>	<p>A complaint is a form of feedback that expresses dissatisfaction towards Council, its policies, procedures, fees and charges, Council officers, Councillors, agents or quality of service affecting an individual or group of customers.</p> <p>A complaint is not:</p> <ul style="list-style-type: none">• A Service Request• A request for Council to exercise a regulatory function• An appeal or objection regarding a statutory process, standard procedure or policy (unless this is recorded as a complaint about the process of Council's decision making)• A request for documentation, information or explanation of policies or procedures• A response provided in relation to specific requests for feedback about the standard or quality of Council service provision• An appeal against fines or penalties issued by Council Officers or agents• A claim for compensation, or about legal matters (i.e. appeals)• A report about a third party (e.g. a neighbour dispute) <p>Note: Service Requests must not be registered as a complaint unless Council has failed to respond appropriately the first time the service request was made, or if the customer specifically complains about the process, Council officer or quality of service provided.</p>
<i>Customer</i>	For the purpose of this Policy, the Customer Advocate is an appointed

Term	Meaning
<i>Advocate</i>	Council officer responsible for actioning, monitoring and coordinating customer feedback.
<i>Feedback</i>	Feedback may be in the form of a compliment, suggestion, comment or complaint.
<i>Public Interest Disclosure</i>	The reporting of allegations of corrupt conduct, maladministration, serious and substantial waste of public money or government information contravention.
<i>Receiving officer</i>	For the purpose of this Policy, the receiving officer is the Council officer who receives and lodges the customer feedback in the first instance.
<i>Service Request</i>	Service Requests include: <ul style="list-style-type: none"> • Requests for approvals • Requests for action • Requests for investigation • Routine inquiries about Council business • Requests for the provision of services and assistance • Requests for explanation of policies, procedures and decisions • Reporting issues requiring maintenance.
<i>Unreasonable customer conduct</i>	Any behaviour by a current or former customer which, because of its nature or frequency raises substantial health, safety, resource or equity issues for Council, its Officers, its service users or customers, and includes the customer themselves.

POLICY STATEMENT

Council is committed to upholding our Mission and Values through a customer focused Feedback and Complaints Management Framework.

This Policy will ensure:

- Customers have choice and flexibility in how they wish to provide feedback
- All feedback (including complaints) received is accepted courteously, and with a view to improving services and customer experiences
- Feedback is managed in an objective, fair and transparent manner
- Council officers are equipped with the knowledge, tools, techniques and skills to resolve complaints in a timely manner
- Customers dissatisfied with the outcome of a complaint are provided with clear review options
- Council undertakes continuous improvement with regard to customer interaction.

1. Customer Feedback and Complaints Management Guiding Principles

1.1. Feedback Management Framework

1.1.1. Council has developed a focused Feedback Management Framework. All feedback lodged with Council will be managed consistently and in accordance with this framework.

1.1.2. The Feedback Management Framework outlines Council's approach to managing customer feedback incorporating:

- Customer feedback service standards
- Receiving feedback
- Managing customer feedback and notification of outcomes Dealing with unreasonable customer conduct
- Records Management
- Confidentiality and Privacy
- Continuous improvement.

1.2. Customer feedback service standards

1.2.1. Customer feedback will be managed in accordance with the following timeframes:

Feedback type	Acknowledgement of Receipt	Resolution
Positive feedback		
Compliment	Immediately (where lodged verbally) or within 2 business days (where lodged in writing, via email or online) via provision of Customer Request Tracking Number	10 Business days
Suggestion/comment	Immediately (where lodged verbally) or within 2 business days (where lodged in writing, via email or online) via provision of Customer Request Tracking Number	10 Business days
Complaints		
Early Resolution	Immediately (where lodged verbally) or within 2 business days (where lodged in writing, via email or online) via provision of Customer Request Tracking Number	Immediately or maximum of 5 business days
Further Investigation	2 business days in writing (via letter or email)	10 business days
Internal Review	2 business days in writing (via letter or email)	10 business days
External Review	Subject to reviewing body	Subject to reviewing body

2. Receiving feedback

2.1. Accepting feedback

2.1.1. Council will accept feedback lodged by telephone, in person, in writing and electronically.

2.2. Acknowledging feedback

2.2.1. All feedback lodged with Council in will be acknowledged within 2 days by the provision of a Customer Request Tracking number.

2.3. Monitoring feedback

2.3.1. All feedback will be regularly monitored.

2.4. Anonymous feedback

2.4.1. Anonymous feedback will be accepted; however investigations into complaints will only be carried out where there is sufficient information provided to conduct the investigation or review.

3. Managing customer feedback and notification of outcomes

3.1. Handling positive feedback (compliments, suggestions and comments)

3.1.1. Compliments received by Council that relate to a Council officer will be forwarded by the receiving officer to the relevant Council officer and their manager for inclusion in the Council officer's next performance appraisal.

3.1.2. Compliments received by Council that relate to a Council service or function will be forwarded by the receiving officer to the manager of the relevant business area and relayed to their team members.

3.1.3. Comments and/or suggestions received by Council will be forwarded by the receiving officer to the manager of the relevant business unit for consideration.

3.1.4. Customers will be provided with details of the outcome of their feedback by the manager of the relevant business area, in accordance with the customer's preferred method of contact.

3.2. Three Tier Approach to Complaint Handling

3.2.1. Complaints lodged with Council will be managed according to the NSW Ombudsman's Office *Three Tier Approach to Complaint Handling* (refer to Diagram 1).

Diagram 1: Three Tier Complaint Framework for Georges River Council



- a) Early Resolution (first tier) – Our staff will attempt to resolve complaints at the first point of contact. They will be adequately empowered to resolve complaints quickly and without escalation whenever possible.
- b) Further Investigation (second tier) – When complaints cannot be resolved early or the customer is not satisfied with the outcome of an ‘Early Resolution’ complaint, the matter will be referred to an identified Customer Advocate for further investigation.
- c) Review (third tier) – customers who are not satisfied with the outcome of a complaint dealt with under ‘Early Resolution’ (Tier 1) or ‘Further Investigation’ (Tier 2), may request an internal review or refer their complaint to an external agency for review.
 - *Internal review* – requests for an internal review must be lodged with Council within ten business days of the date of the original determination. The General Manager (or their delegate) will investigate the matter and notify the customer in writing of the outcome of the internal review within ten business days of receiving the request.
 - *External review* – if a complaint cannot be resolved through internal processes, the customer may refer their complaint to an external agency where it will be handled in accordance with that agency’s policies and processes.

4. Unreasonable Customer Conduct

4.1. Managing unreasonable customer conduct

- 4.1.1. Council will take proactive and decisive action to manage any conduct that negatively or unreasonably affects Council officers, and will support all Council officers to do the same in accordance with this Policy.
- 4.1.2. Council will manage unreasonable customer conduct in accordance with Customer Feedback and Complaints Management Procedures and the NSW Ombudsman’s *Model Policy and Procedures on Managing Unreasonable Complainant Conduct*.
- 4.1.3. Council recognises the categories of unreasonable customer conduct listed in the NSW Ombudsman’s *Model Policy on Unreasonable Customer Conduct* to include:
 - Unreasonable persistence
 - Unreasonable demands
 - Unreasonable lack of cooperation
 - Unreasonable arguments
 - Unreasonable behaviours.
- 4.1.4. Where a customer’s conduct is considered unreasonable, Council officers should first issue a warning letter to the customer requesting the behaviours to cease. If the behaviours continue, Council officers can request an *Unreasonable Customer Conduct Declaration* to be issued by the General Manager.

** A warning letter may not be required in extenuating circumstances. Council officers may request the General Manager to consider an *Unreasonable Customer Conduct Declaration* without a warning letter being issued.

- 4.1.5. The General Manager may consider *Unreasonable Customer Conduct Declarations* made by Council officers and authorise limitations or adaptations to how a customer may interact with Council where the conduct of that customer has adversely affected:
- The health and safety of an employee of Council
 - The efficiency of service delivery and/or
 - The equity and fairness in the allocation of Council Resources.
- 4.1.6. Where the General Manager authorises limitations or adaptations to how a customer may interact with Council in result of an *Unreasonable Customer Conduct Declaration*, the limitations or adaptations may include:
- Who the customer can contact within Council
 - What issues they can raise with Council
 - When the customer can contact Council
 - Where the customer is able to make contact with Council and/or
 - How they make contact with Council.
- 4.1.7. An *Unreasonable Customer Conduct Declaration* can only be authorised or revoked by the General Manager and must be undertaken in accordance with the Customer Feedback and Complaints Management Procedures.

5. Records management

5.1. Recording and registering customer feedback

- 5.1.1. The Council officer who receives feedback lodged with Council is deemed to be the Receiving Officer and are responsible for ensuring:
- a) All feedback is logged in Council's Corporate Property & Rating system
 - b) That feedback received in writing, is registered in Council's Record Management System and
 - c) Records are maintained in in accordance with relevant work instructions or internal record keeping procedures.

6. Confidentiality and Privacy

6.1. Protection of privacy

- 6.1.1. Georges River Council will respect and protect the identity of people making complaints and persons subject of a complaint where this is practical and appropriate.

6.2. Access to information

- 6.2.1. It should be noted that members of the public can make an application to Council to access documents (including complaints) in accordance with the Government Information *Public Access (GIPA) Act 2009* and the *Privacy and Personal Information Protection Act (PPIPA) 1998*. Council may also be legally required to disclose information about complaints, for example, in response to a Court Order or Subpoena.

7. Continuous Improvement

7.1. Reporting and analysis

7.1.1. Regular reports will be run and analysis of data undertaken to monitor trends and quality of customer service in relation to managing customer feedback. Information from these reports will be used to inform improvement activities and will be escalated to the Executive Team by the Customer Advocate and/or the Manager of Communications and Customer Service.

7.1.2. Customers will be encouraged to provide feedback on their experiences and interactions with Council.

RESPONSIBILITIES

Position	Responsibility
Mayor and Councillors	<ul style="list-style-type: none">• Support a culture that values feedback including the recognition of compliments and the effective resolution of complaints.• The Mayor and Councillors can assist individuals who approach them with feedback about Council by referring them to Council's Customer Advocates so that their feedback can be logged and actioned.• The Mayor and Councillors are prohibited from getting involved in the day to day operations and management of feedback in accordance with this Policy and Feedback Procedures (unless the feedback relates specifically to the General Manager)• Encourage customers to discuss or lodge their complaint with Council in the first instance.
General Manager	<ul style="list-style-type: none">• Promote and support a culture that values feedback including the recognition of compliments and the effective resolution of complaints.• Recognise occasions where Council officers have exceeded both the customer and Council's expectations.• Investigate complaints about the Mayor, Councillors and Directors as appropriate.• Actively resolve complaints at first contact whenever possible.• Publicly report on complaints.• Consider, authorise and/or revoke <i>Declarations for Unreasonable Customer Conduct</i>.
Executive Team	<ul style="list-style-type: none">• Promote and support a culture that values feedback including the recognition of compliments and the effective resolution of complaints.• Recognise Council officers who have received compliments for exceeding both customer and Council expectations.• Review data on feedback provided by the Customer Advocate and

Position	Responsibility
	<p>endorse suggested organisational improvements to avoid reoccurrence of complaints in the future.</p> <ul style="list-style-type: none"> • Refer results of feedback data to appropriate Council Committees as required to assist in continuous improvement, reduce risk and/or improve the quality of customer service.
Executive Assistants, Administration Officers	<ul style="list-style-type: none"> • Explain Council's customer feedback framework to customers who enquire about lodging customer feedback. • Register complaints received in Council's Property and Rating System and Record Management System. • Resolve complaints at the first point of contact or where this is not possible; refer to the complaint to the Customer Advocate for review.
Directors, Managers, Coordinators & Team Leaders	<ul style="list-style-type: none"> • Investigate feedback referred by the Customer Advocates within agreed service standard timeframes. • Provide Council officer's with positive feedback where relevant. • In cases where a compliment is found to have exceeded both the customer and Council's expectations, escalate the feedback to the General Manager. • Work with Customer Advocates to resolve complaints as quickly as possible. • Actively resolve complaints at first contact whenever possible. • Implement suggested organisational improvement projects to avoid reoccurrence of complaints in the future. • Register feedback in Council's Property and Rating System and Record Management System.
Customer Advocate/s	<ul style="list-style-type: none"> • Establish, manage, coordinate and report on customer feedback. • Register customer feedback in Council's Property and Rating System and Record Management System. • Refer compliments to relevant Council officers and their Coordinators and Managers. • Issue acknowledgment and notification of outcome correspondence to customers. • Actively resolve complaints at first contact whenever possible. • Make decisions about complaints within the service standard timeframes. • Act as the customer's primary contact for the duration of a complaint until resolved with Council.
All Council officers	<ul style="list-style-type: none"> • Actively resolve complaints at first contact whenever possible or if not possible, refer to the Customer Advocate for review.

Position	Responsibility
	<ul style="list-style-type: none"> Log and register feedback in Council's Corporate Records and Property & Rating Systems Implement the Customer Feedback and Complaints Management Procedures

VERSION CONTROL AND CHANGE HISTORY

Version	Amendment Details	Policy Owner	Period Active
KCC	Former Kogarah Council Complaint Policy discontinued	Kogarah Governance	23/05/2016 – 02/07/2017
HCC	Former Hurstville Council Complaint Policy discontinued	Hurstville Governance	01/11/2013 – 02/07/2017
1.0	Complete new Georges River Council Complaints Policy (Council Resolution CCL137-17)	Manager Communications and Customer Service	03/07/2017 – 18/12/2017
2.0	Customer Feedback Management Policy – includes a change to the Policy title and content to enable a comprehensive approach to ensuring the efficient and consistent handling of all customer feedback, not just complaints.	Manager Communications and Customer Service	19/12/2017 – 11/03/2018
3.0	Minor administrative change following on from ET resolution on 19/12/17 - Additions of the word "Complaints" to the Policy Title and elsewhere in the policy to enable consistency with the amended title - to ensure customers can locate the policy on Council's website.	Manager Communications, Customer Service and Events	12/03/2018 - 19/7/2019
4.0	Minor change to clause	Manager Customer	19/7/2019

	4.1.4, allowing two options when dealing with difficult customers. Endorsed by ET as per email received from Rebekah Schulz on 19/7/19.	Experience and Events	
--	---	-----------------------	--

APPENDIX A: COMPLAINTS COVERED BY COUNCIL POLICIES OR LEGISLATION

Complaint/issue	Responsibly for investigation	Relevant Policy or Legislation
Councillor conduct/misconduct	<ul style="list-style-type: none"> • The General Manager 	<ul style="list-style-type: none"> • <i>Model Code of Conduct for Georges River Council 2017</i> • <i>Georges River Council's Councillor and Staff Interactions Policy 2017</i>
Staff conduct/misconduct	<ul style="list-style-type: none"> • The General Manager • Manager of People & Culture • The Mayor (if complaint is about the General Manager) 	<ul style="list-style-type: none"> • <i>Model Code of Conduct for Georges River Council 2017</i> • <i>Georges River Council's Councillor and Staff Interactions Policy 2017</i>
Public Interest Disclosures	<ul style="list-style-type: none"> • Internal Auditor and • The General Manager 	<ul style="list-style-type: none"> • <i>Public Interest Disclosures Act 1994</i>
Privacy breaches	<ul style="list-style-type: none"> • Manager Governance & Risk 	<ul style="list-style-type: none"> • <i>Privacy and Personal Information Protection Act 1998</i>
Alleged child abuse or breaches of child protection legislation	<ul style="list-style-type: none"> • The General Manager • Manager of People & Culture and • Manager of Children's Services 	<ul style="list-style-type: none"> • <i>NSW Children and Young Persons (Care and Protection) Act 1998 and associated legislation</i> • <i>Education and Care Services national Regulations 2011</i>
Competitive neutrality	<ul style="list-style-type: none"> • Chief Financial Officer and • Manager of Governance & Risk 	<ul style="list-style-type: none"> • <i>Various legislation and regulations</i>
Staff grievances	<ul style="list-style-type: none"> • Manager of People and Culture 	<ul style="list-style-type: none"> • <i>Grievance and Complaint Resolution Administration Policy 2016</i>