

# Customer Feedback and Complaints Management Policy

## Policy administration

<b>Dates</b>	Policy approved 24 July 2023 Policy takes effect upon its approval. Policy is due for review in July 2025
<b>Approved by</b>	Executive on 19 July 2022 Council Meeting 24 July 2023 Council Resolution CCL061-23
<b>Policy Type</b>	<input type="checkbox"/> Executive Policy <input checked="" type="checkbox"/> Council Policy
<b>Exhibition Period</b>	7 June 2023 to 5 July 2023
<b>Policy Owner</b>	Manager City Life
<b>Related Documents</b>	Customer Experience Strategy 2022-2027 Customer Experience Charter Interactions with Children and Young People Policy
<b>Appendices</b>	Appendix A - Complaints covered by legislation or other Council policies
<b>References &amp; Legislation</b>	<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>Children's Guardian Act 2019</i> <i>NSW Children and Young Persons (Care and Protection) Act 1998</i> NSW Ombudsman's Effective Complaint Handling Guidelines, 3 <sup>rd</sup> Edition, February 2017 NSW Ombudsman 'Managing unreasonable conduct by complainants' Model policy – July 2022
<b>Document Identifier</b>	Policy #: Pol-016.06 Doc #: D23/189317
<b>Breaches of Policy</b>	Breaches of any policy will be dealt with and responded to in accordance with adopted codes and/or relevant legislation.
<b>Record Keeping</b>	All documents and information obtained in relation to the implementation of this policy will be kept in accordance with the NSW State Records Act 1998, Georges River Council's Corporate Records Policy and adopted internal procedures.

## Purpose

The Customer Feedback and Complaints Management Policy (the Policy) establishes a framework to enable the handling of all forms of feedback in a consistent, fair, and professional manner whereby:

- 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; and
- Council undertakes continuous improvement with regard to customer interaction.

## Scope

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

When managing a complaint, if a complaint involves issues covered under legislation, then legislation will prevail over the Policy to the extent of any inconsistency with the Policy. A complete list of complaints covered under legislation or other Council policies is attached in **Appendix A**.

## Definition of Terms

Term	Meaning
Complaint	<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"><li>• a Service Request</li><li>• a request for Council to exercise a regulatory function</li><li>• 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)</li><li>• a request for documentation, information or explanation of policies or procedures</li><li>• a response provided in relation to specific requests for feedback about the standard or quality of Council service provision</li><li>• an appeal against fines or penalties issued by Council Officers or agents</li><li>• a claim for compensation, or about legal matters (i.e., appeals)</li><li>• a report about a third party (e.g., a neighbour dispute).</li></ul> <p><b>Note:</b> 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>
Customer Advocate	<p>For the purpose of this Policy, the Customer Advocate is an appointed Council officer responsible for actioning, monitoring and coordinating customer feedback.</p>
Feedback	<p>Opinions, comments or expressions of interest or concern, made directly or indirectly to Council about, our services, our staff, policies, or procedures where a response by Council is required.</p> <p>Feedback will be accepted in person, writing or via social media channels.</p> <p>Once feedback is received by Council, it will be assessed and categorised by the Customer Experience Advocate. Feedback can be categorised as either positive feedback, a complaint (meeting our complaints criteria) or general feedback. Feedback may be in the form of a compliment, suggestion, comment, or complaint.</p>

Public Interest Disclosure	The reporting of allegations of corrupt conduct, maladministration, serious and substantial waste of public money or government information contravention.
Receiving Officer	For the purpose of this Policy, the receiving officer is the Council officer who receives and lodges the customer feedback in the first instance.
Service Request	<p>Service Requests include:</p> <ul style="list-style-type: none"> <li>• requests for approvals</li> <li>• requests for action</li> <li>• requests for investigation</li> <li>• routine inquiries about Council business</li> <li>• requests for the provision of services and assistance</li> <li>• requests for explanation of policies, procedures and decisions</li> </ul> <p>Reporting issues requiring maintenance</p>
Unreasonable customer conduct	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.
Child	A person who is under the age of 16 years.
Young person	A young person can be defined in a variety of ways depending on the context. For the purpose of this policy a young person is a person who is over the age of 16 years but under the age of 18 years.

## Policy Statement

### 1. Feedback Management Framework

- 1.1 This Policy represents framework for managing all feedback received by Council. All feedback lodged with Council will be managed consistently and in accordance with this framework.
- 1.2 The Feedback Management Framework outlines Council's approach to managing customer feedback with respect to:
- Customer feedback service standards;
  - Feedback channels and timeframes;

- Complaint handling;
- Handling other types of feedback;
- Managing unreasonable customer conduct;
- Records management;
- Confidentiality and privacy; and
- Continuous improvement.

1.3 Child protection related complaints and allegations are managed in accordance with Council's Interactions with Children and Young People Policy, Child Safe Code of Conduct - Council Officials, Child Safe Code of Conduct - Service Users and Community, and underlying procedures.

## 2. Customer Feedback Service Standards

2.1 Customer feedback will be managed in accordance with the following timeframes (as also reflected under Council's Customer Experience Charter):

Feedback type	Acknowledgement of Receipt	Resolution
<b>Positive Feedback</b>		
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 – including social media channels) via provision of 'customer request tracking number'.	10 business days
<b>Complaints</b>		
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
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### 3. Feedback Channels and Timeframes

- 3.1 Council will accept feedback lodged by telephone, in person, in writing and electronically. This includes feedback provided by Council’s social media channels.
- 3.2 All feedback lodged with Council will be acknowledged within 2 business days by the provision of a Customer Request Tracking number.
- 3.3 Anonymous feedback will be accepted; however, investigations into complaints will only be undertaken where there is sufficient information provided to conduct an investigation.

### 4. Complaint Handling

- 4.1 As stated under the NSW Ombudsman’s ‘*Effective complaint handling guidelines*’, complaints lodged with Council will be managed according to the NSW Ombudsman’s ‘*Three level approach to complaint handling*’ which has been adapted slightly to reflect the role of Council’s Customer Advocate staff in handling complaints (see Diagram 1 and a) to c)).

Diagram 1: Three tier approach to complaint handling for Georges River Council



- a) Early resolution (first tier) – Council staff will attempt to resolve complaints at the first point of contact in being empowered to resolve complaints quickly and without escalation whenever possible.
- b) Further investigation (second tier) – In instances where early resolution (first tier) is not possible e.g. due to the complexity of the complaint, or when a customer expresses dissatisfaction with the outcome from first tier resolution and wishes to escalate their complaint, the matter will be referred to an identified Customer Advocate staff member, who was not involved in first tier, for further investigation (second tier).

- c) Review (third tier) – Where a customer expresses dissatisfaction with the outcome from second tier, the customer may request an internal review, and subsequently if required, lodge their complaint to an external agency.
- *Internal review* – requests for an internal review must be lodged with Council within ten business days of the date of the original determination. Requests for an internal review must explain the reasons why an internal review is being sought and the specific aspects of the complaint response within which the customer is dissatisfied. Depending upon the reasons provided, the General Manager (or their delegate) will assess the request to determine if the complaint will proceed to third tier. Where a complaint proceeds to third tier, 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 customer remains dissatisfied after all review processes have been undertaken by Council, the customer may decide to lodge their complaint with an agency external to Council, such as the NSW Ombudsman, NSW Office of Local Government or the NSW Independent Commission Against Corruption (ICAC).

## 5. Handling Other Feedback

- 5.1 Compliments received that relate to a Council officer will be forwarded by the Customer Advocate to the relevant Council officer and their manager for inclusion in the Council officer's next performance appraisal.
- 5.2 Compliments received that relate to a Council service or function will be forwarded by the Customer Advocate to the relevant manager at Council.
- 5.3 Comments and/or suggestions received about Council services will be forwarded by the Customer Advocate to the relevant manager at Council.
- 5.4 Customers will be contacted by the Customer Experience Advocate, in accordance with the customer's preferred method of contact, to acknowledge the receipt of their feedback and the outcome of their feedback to Council.

## 6. Unreasonable Customer Conduct

- 6.1 Council will manage unreasonable customer conduct in accordance with the NSW Ombudsman's *'Managing unreasonable conduct by complainants' model policy* including (but not limited to) unreasonable persistence, demands, lack of cooperation, arguments, and behaviours.
- 6.2 Where a customer's conduct is considered unreasonable, the Customer Advocate should first issue a warning letter to the customer requesting such behaviour to cease. If such behaviour however continues, the Customer Advocate can request



an 'Unreasonable Customer Conduct Declaration' to be issued by the General Manager.

6.3 Where there are extenuating circumstances, including (but not limited to), customer conduct giving rise to Council officer/s forming a reasonable apprehension for the immediate or ongoing safety of Council officer/s and/or others being endangered, the General Manager may issue an 'Unreasonable Customer Conduct Declaration' without a warning letter first being issued.

6.4 Following the issuing of an 'Unreasonable Customer Conduct Declaration', the General Manager may also 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.

6.5 Where the General Manager authorises limitations or adaptations to how a customer may interact with Council as a 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; and/or
- Where the customer is able to make contact with Council and/or how they make contact with Council.

6.6 An 'Unreasonable Customer Conduct Declaration' can only be authorised or revoked by the General Manager.

## **7. Records Management**

7.1 The Customer Advocate is deemed to be the 'receiving officer' and is responsible for ensuring:

- Complaints are to be lodged in Council's Corporate Property & Rating system – Application Wizard; and
- All feedback is logged in their category in Council's CI Anywhere system.

## **8. Confidentiality and Privacy**

8.1 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.

- 8.2 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.
- 8.3 [Georges River Council Privacy Management Plan](#) outlines how Council manages personal information.

## **9. Continuous Improvement**

- 9.1 Council Officers will analyse complaint data, monitor trends and quality of customer experience in relation to managing customer feedback. Information from these reports will be used to inform improvement in Council services and customer experience.
- 9.2 Customers will be actively encouraged to provide feedback about their overall experience and specific interactions with Council.

## Responsibilities

Position	Responsibility
<b>Mayor and Councillors</b>	<ul style="list-style-type: none"> <li>• Support a culture that values feedback including the recognition of compliments and the effective resolution of complaints.</li> <li>• 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.</li> <li>• 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)</li> <li>• Encourage customers to discuss or lodge their complaint with Council in the first instance</li> </ul>
<b>General Manager</b>	<ul style="list-style-type: none"> <li>• Promote and support a culture that values feedback including the recognition of compliments and the effective resolution of complaints.</li> <li>• Recognise occasions where Council officers have exceeded both the customer and Council's expectations.</li> <li>• Investigate complaints about the Mayor, Councillors and Directors as appropriate.</li> <li>• Actively resolve complaints at first contact whenever possible.</li> <li>• Publicly report on complaints.</li> <li>• Consider, authorise and/or revoke Declarations for Unreasonable Customer Conduct.</li> </ul>
<b>Executive Team</b>	<ul style="list-style-type: none"> <li>• Promote and support a culture that values feedback including the recognition of compliments and the effective resolution of complaints.</li> <li>• Recognise Council officers who have received compliments for exceeding both customer and Council expectations.</li> <li>• Review data on feedback provided by the Customer Advocate and endorse suggested organisational improvements to avoid reoccurrence of complaints in the future.</li> <li>• 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.</li> </ul>

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**Executive Assistants,  
Administration Officers**

- Explain Council’s customer feedback framework to customers who enquire about lodging customer feedback.
- Register complaints received in Council’s Property and Rating System – Application Wizard 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

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**Directors, Managers,  
Coordinators & Team  
Leaders**

- Investigate feedback referred by the Customer Advocates within agreed service standard timeframes.
- Provide Council officers 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.

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**Customer Advocate/s**

- Establish, manage, coordinate and report on customer feedback.
- Register customer complaints and feedback into Council’s Property and Rating System – Application Wizard, Record Management System and CI Anywhere 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

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**All Council Officers**

- Actively resolve complaints at first contact whenever possible or if not possible, refer to the Customer Advocate for review.
  - Log and register feedback in Council’s Property and Rating System – Application Wizard, Record Management System and CI Anywhere System.
  - Implement the Customer Feedback and Complaints Management Procedures
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## Version Control and Change History

Version	Amendment Details	Policy Owner	Period Active
<b>KCC</b>	Former Kogarah Council Complaint Policy discontinued	Kogarah Governance	23/05/2016-02/07/2017
<b>HCC</b>	Former Hurstville Council Complaint Policy discontinued	Hurstville Governance	01/11/2013-02/07/2017
<b>1.0</b>	Complete new Georges River Council Complaints Policy (Council Resolution CCL137-17)	Manager Communications and Customer Service	03/07/2017 – 18/12/2017
<b>2.0</b>	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
<b>3.0</b>	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
<b>4.0</b>	Minor change to clause 4.1.4, allowing two options when dealing with difficult customers. Endorsed as per email	Manager City Life	19/7/2019 – 19/7/2022
<b>5.0</b>	Administrative amendments to the Policy as outlined in the Executive Team report on 19 July 2022	Manager City Life	19/07/2022 – 24/07/2023

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**6.0**

Administrative amendments under version 5.0 adopted by Council. Minor amendments following review for congruence with National Principles for Child Safe Organisations (as required under Council's ongoing Child Protection Action Plan).

Manager City Life

24/07/2023-  
24/07/2025

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## APPENDIX A: COMPLAINTS COVERED BY COUNCIL POLICIES OR LEGISLATION

Complaint/issue	Responsibly for investigation	Relevant Policy or Legislation
Councillor conduct/misconduct	The General Manager	<ul style="list-style-type: none"> <li>Georges River Council Model Code of Conduct 2022</li> <li>Georges River Council's Councillor and Staff Interactions Policy 2022</li> </ul>
Staff conduct/misconduct	The General Manager Manager of People & Culture The Mayor (if complaint is about the General Manager)	<ul style="list-style-type: none"> <li>Code of Conduct 2022</li> <li>Georges River Council's Councillor and Staff Interactions Policy 2022</li> </ul>
Public Interest Disclosures	Internal Auditor The General Manager	<ul style="list-style-type: none"> <li>Public Interest Disclosures act 1994</li> <li>Georges River Council Public Interest Disclosure Reporting Policy 2020</li> </ul>
Privacy breaches	Manager Governance & Risk	<ul style="list-style-type: none"> <li>Privacy and Personal Information Protection Act 1998</li> </ul>
Alleged child abuse or breaches of child protection legislation	The General Manager Manager of People & Culture and Manager Community and Early Learning Services	<ul style="list-style-type: none"> <li>NSW Children and Young Persons (Care and Protection) Act 1998 and associated legislation</li> <li>Children's Guardian Act 2019</li> <li>Education and Care Services National Regulations 2011</li> <li>Interactions with Children and Young People Policy</li> <li>Child Safe Code of Conduct - Council Officials</li> <li>Child Safe Code of Conduct - Service Users and Community</li> </ul>
Competitive neutrality	Chief Financial Officer and Manager of Governance & Risk	<ul style="list-style-type: none"> <li>Various legislation and regulations</li> </ul>

Staff grievances	Manager of People and Culture	<ul style="list-style-type: none"><li>Grievance and Complaint Resolution Administration Policy 2017</li></ul>
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