



Policy Title	Customer Feedback Policy
Related Documentation	<p>NSW Ombudsman <i>Effective complaint handling guidelines</i>, 2nd Edition, December 2010 Joint publication of the NSW Ombudsman and Department of Local Government Complaints Management in Councils Practice note no. 9, revised July 2009 NSW Ombudsman <i>Managing Unreasonable Complaint Conduct – a Model Policy and Procedure</i> 2012 Workplace Investigations Authorised statement Customer Feedback Authorised statement Grievance handling Authorised statement Grievance handling Procedure Child Protection Policy Code of Conduct Internal reporting Policy – Public Interest disclosures Access to Information Policy Councillor Protocol Policy Privacy Management Policy</p>
Relevant Legislation	<p>Privacy and Personal Information Protection Act 1998 Government Information (Public Access) Act 2009 Australian Standard ISO 10002-2018 Guidelines for complaints management in organisations NSW Ombudsman Good Conduct and Administrative Practice – Guidelines for state and local Guidelines NSW Ombudsman Enforcement Guidelines for Councils NSW Ombudsman Unreasonable conduct by Complainant Model policy NSW Ombudsman Unreasonable conduct by a Complainant NSW Ombudsman Effective complaint handling guidelines NSW Ombudsman Complaint management framework and model policy NSW Ombudsman Apologises – A practical guide</p>
Responsible Officer	Manager Customer Experience

Policy details may change prior to review date due to legislative changes, therefore this document is uncontrolled when printed.

DATA AND DOCUMENT CONTROL – GOVERNANCE USE ONLY

Directorate: City Governance Section: Customer Service Record No: CDO-24/712	Adopted Date: 29/10/2024 Revised Date: 29/10/2024 Minute Number: 314 Review Date: 30/09/2028	Page: 1 of 12
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Policy Statement

This Policy ensures Council has an approach to investigate complaints and encourage feedback from customers.

We are committed to seeking and receiving feedback about our services, program delivery, processes, performance and conduct of Council staff and Councillors.

Objectives

This Policy will provide customers the opportunity to provide feedback to Council and to ensure feedback is handled consistently, fairly, efficiently and effectively and in line with best practice as set out in this Policy.

Our customers will:

- Be treated with respect, integrity and honesty
- Have their feedback passed onto the responsible/nominated officer(s)
- Receive no charge for providing feedback
- Have their feedback handled in accordance with this Policy
- Have their personal details kept secure
- Not be adversely affected because they have made a complaint

Scope

This Policy applies to all Councillors, Council staff and persons carrying out work on behalf of the Council, for example contractors and workplace students.

Council staff are responsible for encouraging feedback, and assisting to lodge feedback, from our internal and external customers.

Definitions

Complaint	Defined as an expression of dissatisfaction made to or about Council, services, procedures, staff or the handling of a complaint.
Compliments	Defined as an expression of when we have met or exceeded the needs or expectations of the customer.
Dispute	An unresolved complaint escalated either within or outside of Council.
General Feedback	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Council, about our services, performance or complaint handling where a response is not explicitly or implicitly expected or legally required.
Grievance	A clear, formal written statement by an individual staff member about another staff member or a work related problem. (Refer to Council's Grievance Policy).
Public interest disclosure	A report about wrongdoing made by a public official in New South Wales that meets the requirements of the <i>Public Interest Disclosures Act 1994</i> . (Refer to Council's Internal Reporting Policy)

Campbelltown City Council

Service Coordinator	Defined as the responsible subject matter or service lead.
Service request	Service requests will be recorded in Council's Request Management System. It is defined as a request for a service or action by a customer and will include: <ul style="list-style-type: none"> • requests for approval • requests for action • routine inquiries about Council business • requests for the provision of services and assistance • reports of failure to comply with laws regulated by Council • request for explanation of policies, procedures and decisions.

Policy Responsibilities

Role	Key Responsibilities
Mayor and Councillors	<ul style="list-style-type: none"> • Responsible for adhering to this Policy • Refer customer feedback to Council for appropriate action in compliance with the Councillor Protocol Policy. • Input into the proposed strategies and policies in relation to feedback.
Chief Executive Officer (CEO)	<ul style="list-style-type: none"> • Responsible for adhering to this Policy • Ensure staff awareness and compliance with the Policy • Investigate sensitive and serious complaints or nominate an Investigating Officer • Regularly review reports on feedback, complaints and compliments on arising trends and support recommendations for improvement • Develop a culture of customer centricity and continuous improvement by taking on customer feedback and integrating it into Operational Plan actions to be undertaken within divisions or departments • Encourage staff to make recommendations for improvements. • Recognise and reward good feedback, complaint and compliment handling by staff.
Supervisors	<ul style="list-style-type: none"> • Responsible for adhering to this Policy • Ensure staff awareness and compliance with the Policy • Investigate complaints or nominate an Investigating Officer • Regularly review reports on feedback, complaints and compliments on arising trends and support recommendations for improvement • Assist and support staff to lodge customer feedback requests and attempt to resolve at first contact • Develop a culture of customer focus and continuous improvement by taking on customer feedback and integrating it into Operational Plan actions to be undertaken within their department • Recognise and reward good feedback, complaint and compliment handling by staff.
Supervisors	<ul style="list-style-type: none"> • Ensure team related processes, guidelines and directives are given in line with this policy, Council Values and Code of Conduct. • Encourage staff to make recommendations for improvements.
Staff	<ul style="list-style-type: none"> • Responsible for adhering to this Policy • Lodge requests, notes on interactions and all associated communication documents in our corporate systems. If its existing, look up the original request and add interaction notes

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	<ul style="list-style-type: none"> • Attempt to resolve issues or concerns before they escalate to a formal complaint in line with this Policy • Escalate any concerns or issues in meeting established Standards within this policy with your direct supervisor.
Manager Customer Experience	<ul style="list-style-type: none"> • Responsible for the review of this Policy • Assist and support Council employees in relation to administering the Policy.
Public Officer	<ul style="list-style-type: none"> • Manage and allocate Tier 2 Internal Review complaints • Manage, assess and investigate serious sensitive complaints. • Investigate non-compliance in-line with this Policy, Customer Service Experience Policy and Charter, Council Values and Code of Conduct.
Investigating Officer	<ul style="list-style-type: none"> • Investigate the complaint in line with this Policy.

1. Types of feedback

a) Compliments

Compliments are received when we have met or exceeded the needs or expectations of the customer. The receipt of compliments assists us in:

- Understanding what aspects of our service customers value
- Understanding how our service impacts on our customers
- The ability to share and reinforce examples of best practice
- Building morale and provide recognition to our staff.

b) General Feedback

Feedback about our program delivery, services, processes and performance assists us in understanding:

- What services our customers require
- How our service impacts on our customers
- What information we could provide to the community.

c) Complaints

A complaint is an expression of dissatisfaction with our services, staff or procedures. General complaints are managed in accordance with Council's three-tier Complaints Handling Model (explained in Section 3 of this Policy). A service request is not classified as a complaint (unless the feedback is related to Council's response times to a service request). Comments of a harassing nature with no identifiable purpose are not classified as complaints and will not be investigated further.

A complaint is an expression of concern about:

- Delivery of a Council service
- Customer service experience
- Failure to provide information
- Competence or conduct of staff
- Errors of judgement or misinterpretation of information
- Decisions being unfair, unreasonable, inconsistent or lacking in merit

- Poor administrative processes.

A complaint is not:

- Feedback relating to a Council resolution
- Feedback relating to the determination outcome of a development application
- Feedback relating to the information provided as requested in an access to information application (GIPA)
- A matter that has already been reviewed by an external agency
- Feedback relating to a particular Councillor outside their role as a Councillor
- Any work-related grievance from a Council employee
- A request for services – unless it is a second request where there has been no response to the first
- A request for information or an explanation of policies or procedures
- Making an expression of opinion – where a response or resolution is not expected (for example, a submission or feedback on a service).

d) Types of complaints that will not be investigated

The CEO and/or the Public Officer may determine that a complaint will not be investigated where that complaint:

- Is considered frivolous (not having purpose or value), vexatious (to cause annoyance or frustration) or not made in good faith or concerns a trivial matter
- Involves a matter where an adequate remedy or right of appeal already exists, whether or not the complainant uses the remedy or right of appeal
- Relates to conduct before a court, coroner or tribunal
- Relates to matters under investigation by the Minister for Local Government, ICAC, the NSW Ombudsman's Office, a Minister of the Crown or government department or the NSW Police
- Relates to the appointment or dismissal of any employee or an industrial or disciplinary issue
- Relates to a decision, recommendation, act or omission which is more than one year old
- Relates to a matter the subject of a current report to Council that has not been considered and/or determined
- Relates to a resolution of Council or a decision dealing with a matter of policy or the adoption of a policy
- Relates to the actions or conduct of private individuals
- Relates to a matter where there is insufficient information available
- Involves a matter where the complainant declines or refuses to provide further information and/or there are threats made against Council, Councillors and/or Council staff.

Complaints relating to alleged breaches of Council's adopted Code of Conduct and procedures by a Councillor, Council staff or delegate of Council will be dealt with in accordance with the procedures prescribed under the Code rather than under Council's normal complaint handling procedures.

e) Anonymous complaints

We accept anonymous complaints, where there is enough information to be able to investigate the issues raised. We encourage complainants to provide their contact details, as we may not be able to investigate the matter thoroughly without obtaining additional information.

f) Sensitive complaints

Complaints received naming particular employees are distributed securely to the appropriate department manager for investigation to ensure, as far as practical, the privacy and confidentiality of all parties involved.

Under the principle of natural justice, named employees are entitled to be provided with details of any complaint against them which is investigated. Assistance and support will be provided to both the complainant and the employee (where required) during any investigation.

Complaints received naming Councillors, the Mayor or CEO will be distributed securely to the Public Officer or CEO (as appropriate) for assessment, investigation and possible resolution.

Complaints relating to alleged breaches of Council's adopted Code of Conduct and procedures by a Councillor, Council staff or delegate of Council will be dealt with in accordance with the procedures prescribed under the Code rather than under Council's normal complaint handling procedures.

2. Policy Principles

a) How we handle your feedback

For Compliments, we will:

- Record the details of your compliment in Council systems
- Acknowledge your compliment within ten business days
- Distribute the compliment.

For General Feedback, we will:

- Consultation, public exhibition and survey feedback will be processed as part of the project and in line with community engagement policy
- For all other general feedback, record the details of your feedback in Council systems and distribute to the relevant service Coordinator
- Simple feedback requests or queries will be responded to within 10 business days. For complex or longer-term feedback requests, it will take time to investigate and get the right response to you. In these cases, we will acknowledge your correspondence with 10 business days and keep you informed with progress updates.

For Complaints, we will:

- Record the details of your complaint in Council systems
- Use a three-tier complaint-handling model as outlined below to distribute general complaint
- Assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised.
- Regularly monitor the feedback we receive and use this information to improve our services, program delivery, processes, performance and conduct of Council staff and Councillors.

b) Complaint Principles

i) Objectivity and fairness

Council will address each complaint with integrity and in an equitable, objective and unbiased manner.

The person handling the complaint will be different from any staff member whose service or conduct is being complained about. Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

ii) Confidentiality and Privacy

Council will not disclose the identity of a person who has made a complaint. However, Council may be compelled to disclose this information under a Court order.

Personal information that identifies individuals will be collected, retained, disclosed and/or used by Campbelltown City Council as permitted by the Information Protection Principles under the relevant privacy law and as provided in our Privacy Management Policy.

Requests for access to Council information will be considered in accordance with our Access to Information Policy, the relevant access legislation, individual privacy rights as legislated, and any relevant confidentiality and statutory obligations.

iii) Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance. If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

c) Managing the parties responding to a complaint

i) Complaints involving multiple agencies

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated. Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

ii) Complaints involving multiple areas

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated. We take complaints not only about the actions of our staff but also the actions

of service providers. Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system.

iii) Complaints involving multiple parties

When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

d) Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our staff, and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy. Examples of unreasonable behaviour includes:

- Unreasonable persistence
- Unreasonable demands
- Unreasonable absence of cooperation
- Unreasonable arguments
- Unreasonable behaviours

e) Limitations on service or communication

We encourage customers to lodge complaints in an appropriate manner. Council expects that the behaviour of customers and the community will stay within reasonable limits. If behaviour strays beyond these limits, we are entitled to place and enforce limits on contact between Council and the person displaying inappropriate behaviour.

We will only apply this part of the policy in exceptional cases, where it is necessary to ensure the health, safety and wellbeing of Council staff or equity in the use of Council resources. These limits can apply to an individual customer or a group. This Policy does not limit legislative access and service rights.

The Public Officer may limit service or communication with a customer if there is evidence that they are an unreasonable complainant. The Public Officer will first consider whether:

- The complaints procedure has been implemented correctly so far as practical to this point and no material element of the complaint has been overlooked or inadequately addressed
- The behaviour of the complainant has become intimidating, threatening, offensive or so habitual or obsessive that it constitutes an unreasonable demand on Council's resources.

Depending on the circumstances, the limitations could include one or more of the following:

- Whom a customer may contact within Council
- The number of opportunities we will give to a customer to address the same or similar issues
- The number of issues we will address in any given period
- The types of issues we will address (e.g. we will only address significant and serious issues)
- The times and days telephone calls will be accepted by Council
- The termination of phone calls or meetings when appropriate, e.g. we may terminate phone calls or meetings if the customer is abusive or threatening or has been instructed to correspond only with a specific staff member who is not available at that time. Staff members may terminate calls or meetings after an initial warning to any customer who is abusive or threatening
- The requirement that the customer must only communicate with Council in writing
- The number of responses to complaints, correspondence, or enquiries on the same or similar issues where he or she does not provide new information
- Correspondence will be received, read, and recorded, but only acknowledged or otherwise responded to if he or she provides new information.

Limitations on the provision of information will not occur if we are under a statutory responsibility to provide the information.

The Public Officer will document the limits on service or communication and inform the customer of the reasons for taking such steps.

f) Review or appeal of limits on service or communication

Requests to remove a limitation of service or communication must be made in writing to the CEO by the person to whom the limits apply. The CEO will only consider one written request per year. On completion of the review, the CEO will advise the person of any subsequent review dates. If the customer is dissatisfied with the review, he or she may contact the NSW Ombudsman's Office, depending on the circumstances, or the Office of Local Government.

3. Three tiers of complaint handling

a) Tier 1 – Frontline Complaint Handling

Staff are empowered to resolve complaints promptly and with as little formality as possible. Council will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

- Where a written complaint is received, acknowledge receipt within ten working days
- Where a simple or non-contentious complaint is received, staff will attempt to resolve complaint at first point of contact or refer the complaint to a staff member who may be able to resolve the complaint
- Where a complaint is unable to be resolved at first point of contact, the staff member will escalate to the appropriate Service Coordinator, who will nominate an investigating officer
- If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.
- The investigating officer will investigate and will attempt resolution within ten working days. For complex complaints, it will take time to investigate and get the right response to you. In these cases, we will let you know we need more time to investigate and keep you informed with progress updates.

b) Tier 2- Internal Review

An internal review is not to determine a different response, but to check that all involved in determining the original decision have taken all the required steps in the procedure.

- A request for internal review must be in writing and lodged by email, letter or in person.
- Record the details of request in Council systems and acknowledge receipt within 10 working days.
- The Public Officer will nominate a Senior Officer. Where possible staff involved in the original request will not be involved in internal review. The Public Officer will advise the complainant that the matter has been referred for internal review within 10 working days.
- The Senior Officer will complete the internal review and document recommendations to maintain, amend or rescind the previous decision and propose additional corrective actions or remedies as considered necessary to Public Officer within 15 working days
- The Public Officer will refer the information to the Deputy General Manager/CEO to authorise the proposed response together with any additional actions or remedies to be implemented within 10 working days. If we require more time to investigate, we will let you know.

c) Tier 3 – External Review

Where a complaint continues to remain unresolved, the complaint will be referred to the Deputy General Manager who may refer the unresolved complaint for external review or, alternately, advise the complainant of the avenues available to them should they wish to pursue the matter further. The Deputy General Manager will provide such advice to the complainant in writing. Complaints, dependent on their nature, can be referred to the following external agencies for external review: [NSW Ombudsman](#), [Independent Commission Against Corruption \(ICAC\)](#), [the Office of Local Government](#), [Anti-Discrimination NSW](#) and the [NSW Information and Privacy Commission](#).

4. Management of Sensitive Complaints

A sensitive complaint naming Council staff must be in writing and lodged by email, letter or in person. For Sensitive Complaints naming a Council staff member, we will:

- Record the details of request in Council systems and acknowledge receipt within 10 working days
- The Service Coordinator will advise the complainant when a response from Council is expected within 10 working days
- The Service Coordinator will be responsible for coordinating the investigation of the complaint. The Service Coordinator may delegate the investigation of the complaint, or parts of the complaint
- In investigating a complaint, the designated investigation officer will follow the rules of procedural fairness. The designated investigation officer must:
 - inform the staff member(s) of the content of any allegations or adverse comments made against them
 - ensure that any enquiries made under this part which might give rise to disciplinary action is done so in accordance with the relevant local government awards.
 - ensure that the person/s who is/are the subject of the complaint is/are aware of their right to be represented
 - provide the staff member(s) with a reasonable opportunity to put their case forward
 - review relevant documents and consider submissions
 - make reasonable enquiries before making a recommendation
 - ensure that no person is involved in enquiries in which they have a direct interest act fairly and without bias

- conduct the enquiries without undue delay.
- The designated investigation officer will complete the investigation and document recommendations
- The designated investigation officer will refer their recommendations to the relevant Service Coordinator and will then determine what action is to be taken.

5. Feedback

a) How to provide feedback

Visit us in person:	Council's Customer Service Centre: 91 Queen Street Campbelltown NSW 2560 Hours: Monday to Friday, 9am to 4pm excluding public holidays
Call Centre:	Phone: 02 4645 4000 Hours: Monday to Friday 8:30am – 4.30pm (excluding public holidays)
Write to us:	Use the council@campbelltown.nsw.gov.au Campbelltown City Council, PO Box 57, Campbelltown NSW 2560
Online form:	Use the online form available on the Council Webpage https://www.campbelltown.nsw.gov.au/Have-Your-Say/Feedback-And-Suggestions

- Sensitive complaints naming Council's staff must be in writing and lodged by email, letter or in person.
- A request for Tier 2 internal review must be in writing and lodged by email, letter or in person.

a) What we need to know and expect from customers

It is important to record information about your feedback. To help us understand your feedback, we ask that you:

- Treat us with respect
- Work with us to solve problems and reach resolution
- Provide us with information that is timely, accurate and complete
- A description of the issue or situation, including any dates, times, locations of incidents and if appropriate, supply supporting documents, photos or videos
- Quote reference numbers when contacting us about an existing matter
- Your contact details including name, address, contact phone numbers and email address.

Council has a zero-tolerance approach towards violent and abusive service interactions. Anyone found to be either violent or abusive may be refused service, asked to leave any one of our offices, buildings or sites or call terminated after an initial warning.

6. Accountability and learning

a) Analysis and evaluation of complaints

Council will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of customer service and make improvements. Both reports and their analysis will be provided to senior management for review.

b) Continuous improvement

Council is committed to improving the effectiveness and efficiency of feedback and complaint handling. Council will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints data, and
- implement appropriate changes arising out of analysis of complaints data and continual monitoring of the system.

c) Training and Competence

Council is committed to staff receiving training relevant to the tasks/activities identified in this Policy. Any training requirements will be reviewed annually and recorded in the training request system. All training regarding complaints handling will be evaluated to ensure continuous improvement.

d) Responsibility

The Manager Customer Experience is responsible for ensuring the principles detailed in the policy are adhered to.

e) Effectiveness of this Policy

The policy will be reviewed four-yearly, or at a date set by Council resolution, to ensure it is meeting legislative requirements and is operating effectively.