Complaint Handling Guideline

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Introduction

The City accepts that complaint handling is a predictable and necessary part of service, program and project delivery.

Errors, misunderstandings, customer dissatisfaction and unexpected problems occur in all organisations. Complaint handling, when conducted correctly, can be an effective process in resolving a problem before it worsens or escalates.

Complaints also provide the City with information about weaknesses in processes and service delivery. An effective complaint handling process is not only about following complaint handling procedures, but incorporates regular review of existing business planning, programs and projects to enable improvements to be made.

The *Complaint Handling Guideline* builds on the complaint handling protocol and procedures by defining the essential principles for effective complaint handling.

The purpose of this guideline is to emphasise the importance of complaint handling as a means of improving the City’s responsiveness to the community and provides a guideline to employees on how to handle complaints received by the City.

It is also important that employees familiarise themselves with the service standards stated in the City’s *Customer Service Charter* and associated processes in respect of complaints handling.
The five key elements of complaint handling

Effective complaint handling consists of the following five key elements:

- **Culture**
  - The City values complaints as a means of strengthening it’s administration and improving it’s relations with the community.

- **Principles**
  - An effective complaint handling system is modelled on the principles of:
    - fairness
    - accessibility
    - responsiveness
    - efficiency
    - communication.

- **People**
  - Employees must be skilled, professional and acceptable to taking ownership of complaints and to deal with them effectively and efficiently.

- **Process**
  - The core stages of complaint handling incorporates:
    - Acknowledgement – acknowledge the complaint promptly.
    - Assessment – assess and assign priority to the investigation.
    - Planning how to investigate – investigations should be planned in their approach.
    - Investigation – the investigation needs to resolve factual issues and consider options for complaint resolution.
    - Response – any response should be polite, clear and informative.
    - Review – Internal review mechanisms are available and offered where a complainant is unsatisfied with the response as well as access to external review agencies.

- **Analysis**
  - The complaints handling system should enable analysis of complaints to identify potential systemic issues and areas of improvement.
Complaints and how they improve our organisation

The City promotes the standards of service that customers can expect through the City's Customer Service Charter. The Customer Service Charter has direct alignment to the Joondalup 2022 strategy document and so provides the standards by which the City will meet the growing need and expectations of our community. While the City will always aim to achieve these standards, the City will not always meet the expectations of our customers on all occasions. It is therefore important to ensure that complaints are handled appropriately with clear procedures and a documented process in accordance with the Australian Standard on complaint handling (AS ISO 10002-2006), and in doing so, also meet the requirements of the Ombudsman of Western Australia.

One component of the Standard is using complaint information for the benefit of improving processes, procedures, and the level of customer service provided.

When dealing with customer complaints we should always ask ourselves:

- Does this happen regularly?
- Is it likely to happen again? If so, could we do something better or different?
- Is there an opportunity for improvement?

Therefore, registering a complaint should not be seen as a bad reflection on the work of the City, or an individual, but as an opportunity to improve. With this positive approach organisations are able to openly review business planning, programs, policies, projects and services to identify inefficiencies and issues to better serve the community.

Note: All complaints should be entered in the Customer Request Module (CRM) Tech 1. This system is used to register, action, track and report on requests, complaints and compliments received by the City.

What is a request and what is a complaint?

The definition of a complaint can, at times, be a little unclear.

The difference between a request for service and a complaint doesn’t need to be difficult to interpret, however, the following examples may help:

Request for service

The City receives many requests for service everyday. A request serves to advise the City of a need to improve a situation

Scenario 1 – a customer contacts the City and states “I want to make a complaint about the noise from my neighbour's property. I cannot sleep and I am fed up. I want the City of Joondalup to do something about this”
The scenario above is not a complaint against the City. Albeit, the customer may be upset about a situation and possibly state that they wish to make a complaint; the situation itself has not presented itself as a result of the City’s action, standard of service or lack of action.

**A complaint**

Based on scenario 1, if, after the matter has been reported to the City i.e. a request for service has been made, the City fails to follow up on the matter and the customer contacts the City again advising that the issue is not being actioned, this is a complaint.

**Scenario 2** - a customer contacts the City to advise that their domestic or recycle rubbish was not collected in the normal scheduled operation. As this is a standard service provided to the community and published for specific days of the week (unless varied and advised), the City has failed to meet the standard of service and therefore the customer's report is to be handled as a complaint.

To clarify between a request for service and a complaint, it is important to remember:

“**A complaint is an expression of dissatisfaction about the standard of service, actions or lack of action by the City.**”

In addition, if the matter reported to the City does not comply with commitments made in the Customer Service Charter, be it in one or more of the criteria, it constitutes a complaint and should be handled as such.

**Handling complaints**

**How are complaints made?**

Complaints to the City are made using various means, such as:

- in writing
  - Letter, e-mail, social media i.e: Facebook and Twitter, online forms, customer comment forms, surveys and fax
- face to face
- over the phone
- via Elected Members
- via a local member of parliament
- via other government agencies e.g: Ombudsman WA and Department of Local Government and Communities
- via a solicitor
Who receives complaints?

In most instances the City’s Switchboard Operators will direct customers who wish to make a formal complaint against the City to the Customer Relations Advocate. Record Services will also direct written complaints to the Customer Relations Advocate.

However, employees of the City will also receive complaints directly or within their Business Unit and therefore are required to record complaint information within the CRM module in the Tech 1 system and action accordingly.

Who can handle complaints?

All employees are empowered to deal with complaints and are to take responsibility for ensuring customer concerns are registered and dealt with appropriately and in accordance with the Complaint Management Protocol and related procedures. Employees may refer a complaint to a supervisor, coordinator, business unit manager or director, as required.

Who can assist with recording complaints?

The Customer Relations Advocate is available to provide advice and guidance to employees in the handling of complaints. The Customer Relations Advocate will also assist customers wishing to make a complaint and facilitate resolving their concerns.

What happens when a written complaint (including e-mails) is made?

The following is a guide to how written complaints are to be handled:

- Complaints in writing are actioned by Record Services to the Customer Relations Advocate who will record the complaint as an Action Request in the CRM system, and either:
  - delegate the Action Request to the appropriate employee for investigation and a response,
  - may elect to deal with the complaint depending upon the nature of the complaint.
- Complaints direct to employees are to be handled within their Business Unit. In these instances, the employee should TRIM the complaint and create an Action Request and record it in the CRM system.
- There are occasions when the Customer Relations Advocate may be involved in the investigation or in responding to the customer, particularly if the issue relates to more than one business unit.
- Following the investigation, a response is to be provided to the customer by phone or letter.
- The Action Request will be updated with final comments and actions, and closed.
Do all complaints have to be in writing?

No, it is not a requirement that service complaints must be made in writing.

Requiring a customer to put a complaint in writing could be seen as a barrier that deters people from providing feedback or registering their concerns.

Customers making serious allegations, however, may be requested to put the complaint in writing, for example, code of conduct complaints.

Written responses to complaints

Written responses to complaints should be comprehensive and deal with all issues raised in the complaint.

An incomplete or inaccurate response may be seen as dissmissive and may well prompt a second or further complaint. Some complaints arise from poor communication, use of technical ‘jargon’ or inadequate information in the first instance. Therefore care should be taken to communicate as effectively as possible.

A written response should contain an acknowledgement of the issue, irrespective of whether you think the customer is right or wrong. Do not be defensive or try to apportion blame.

For example:

“Thank you for your letter of ..... in which you express concern regarding ..... I note your comments relating to ..... ”

A factual response with appropriate clear explanations is usually sufficient.

For example:

“Following investigation, I can advise that ..... the City has reviewed this matter and advises ..... ”

If the customer is objecting to a decision that has been made, ensure the response is provided in clear terms that the recipient will understand. It may well be that the objection is due to a misunderstanding of guidelines or process and a clear explanation should assist the customer to gain an understanding of the reasons for that decision.

For example:

“The City’s decisions on proposed developments are governed by the Residential Design Codes. The City does have the discretion to approve ..... The application was assessed against ..... (legislation). In this case the ..... did not comply with ..... ”
Provide an apology, where appropriate, for any inconvenience or misunderstanding caused, regardless of the rights and wrongs of the matter, and advise the customer that his/her comments will be noted for further service improvements.

For example:

“Thank you for bringing this matter to our attention. All comments provided by customers are noted in order to minimise the recurrence of similar issues and to enable the City to continuously improve... ”

“Thank you for taking the time to provide your comments and I apologise again for any inconvenience caused.”

The Customer Relations Advocate will assist with the response to a complaint, for example you may provide a draft letter of response to the Customer Relations Advocate to seek feedback as to whether the response is suitable and addresses the concern/s raised.

Letters responding to the Ombudsman Western Australia, members of parliament or ministers should be signed by the Chief Executive Officer.

What should I do if I get a verbal complaint? (in person or over the phone)

If an employee receives a verbal complaint from a customer about the City’s service, decisions, policy or procedures, the employee should:

- find out the full details of the complaint and facts around the issue
- advise the customer that the complaint will be followed up by the relevant employee, or provide an explanation, if appropriate. Ensure the contact details of the employee are provided to the customer
- determine what action the customer would like to happen, i.e. How would they like the matter resolved; what outcome is the customer seeking? Sometimes a customer may wish to simply ‘let the City know’
- advise the customer what the next step will be, e.g. explain the complaints process
- complete registration of the complaint in CRM. Provide details of the CRM Action Request registration number to the customer
- investigate the complaint, or refer to the appropriate employee, ensuring ongoing comments relevant to the investigation are updated in CRM
- ensure the customer is kept up to date with progress of the complaint, particularly if the investigation exceeds 7 business days (as per the City’s Customer Service Charter)
- provide a response to the customer by phone, letter, email, or, if appropriate, in person
- update and close the Action Request only after the final actions and responses are completed.
If a complaint is resolved over the phone, the complaint must still be registered as an Action Request in CRM (Tech 1), and closed with all relevant comments and actions taken to resolve the issue also registered. This information is important for recording and reporting purposes and is an essential as part of the City’s continual improvement process and may be important for future reference.

Alternatively, the employee may offer to send out a Customer Feedback Form or direct the caller to the online Customer Feedback Form page on the City’s Website.

For further information, please refer to the Complaints Management Protocol on the intranet.

The do’s and don’ts when dealing with a verbal complaint

All customers deserve to be treated courteously and professionally. The following steps will assist in dealing with customers verbally.

Do:

- Listen and understand the issue from the customer perspective.
- Empathise with and acknowledge their feelings.
- Ask questions, and paraphrase and read back. ie. summarise what has been said and your understanding of the issue.
- Provide explanations if and when appropriate.
- Apologise for any inconvenience caused, where appropriate.
- Determine what outcome the customer would like to see happen. You may save a lot of time simply by asking this question.
- Agree on a course of action.
- Ensure that the agreed action takes place – be responsible for the action being dealt with.

Do not:

- Get angry yourself or take the issue personally.
- Tell the customer to calm down.
- Defend yourself or the City.
- Interrupt the customer.
- Make inappropriate or sarcastic comments.
What happens if the customer is not happy with the response to a complaint?

Whilst trying to provide the best service at all times, there are occasions when the customer will not be satisfied with our response. For example:

- the customer’s expectations may be unrealistic
- some customers are unhappy with a decision made in accordance with guidelines, procedures or legislation
- some issues are outside the City’s legislative powers.

Depending upon the situation, the customer may be advised, for example:

“Whilst we note your comments regarding ... this matter has been dealt with in accordance with ... (procedures, relevant legislation) and the City on this occasion is unable to assist any further.”

or

“The City will respond to all concerns for which we have powers to act under local government and statutory legislation; however, the City can take no action on some of the matters you raise ... [or] ... the City does not have the legislative powers to act in these situations.”

or

“You may wish to address your concerns to ... (appropriate external agency) which has powers to deal with this matter.”

Should the customer remain unhappy, please refer to the section ‘Levels of appeal’ in these guidelines.
Levels of appeal

The City’s complaints management process has a tier approach to an appeal process. It must also be noted that some of the City’s actions or decisions may have access to a formal appeals/objection process and employees must therefore make themselves aware of such processes.

If a customer is unhappy with a response provided and does not replace a formal appeal or objection process, the matter may be reviewed at Tier 2 and onwards as follows:

<table>
<thead>
<tr>
<th>Tier</th>
<th>Description</th>
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| Tier 1 | Frontline complaint handling  
Employees are empowered to resolve complaints wherever possible. If the customer wishes to appeal a decision, employees are to refer the issue to their Supervisor or Coordinator. Employees are required to record complaints in the Customer Request Module (CRM). |
| Tier 2 | Internal review or further investigation  
Refer to the Customer Service Coordinator, Business Unit Manager or Director responsible for the area where the issue resides and who reviews/investigates unresolved complaints. |
| Tier 3 | Internal review at a more senior level  
Refer to the appropriate Director or CEO. |
| Tier 4 | External review  
Referral to Ombudsman Western Australia or Department of Local Government and communities, or customer informed of appeal procedure, mediation or other legal remedy. |

Please note: At any stage in the levels of appeal, the customer complaint may be deemed as suitably dealt with, whether this is determined by the City, or the customer. Should the customer not be agreeable, they should be provided with the contact details of the Ombudsman Western Australia. Please refer to the section ‘Referral to Ombudsman Western Australia’.

Referral to Ombudsman Western Australia

Referring a customer to the Ombudsman Western Australia should always take place when a matter has been fully investigated and reviewed by the City and the customer is still dissatisfied with the response at Tier 3 as per the ‘Levels of Appeal’ in these guidelines.

However, it is a customer’s right to access the services of the Ombudsman Western Australia at any stage of the proceedings, and customers should be made aware that they can refer a matter to the Ombudsman Western Australia for investigation. Customers expressing dissatisfaction should be advised verbally or by letter that:
The City endeavours to resolve all complaints to the satisfaction of all parties and in compliance with relevant legislation. An internal review can be undertaken if you are not satisfied with the outcome of your concern. If you wish the matter to be reviewed externally, you may contact the Ombudsman Western Australia at:

Ombudsman Western Australia  
PO Box Z5386  
St Georges Terrace  
Perth WA 6831.

Responses to the Ombudsman Western Australia

If the Ombudsman receives a complaint from a customer, they will telephone the City and request information on behalf of the customer. The conversations should be documented in an Action Request and the Customer Relations Advocate advised of the details.

On occasion, the Ombudsman writes to the City to request further information and details of actions taken by the City. The issue will be investigated by business unit staff and/or the Customer Relations Advocate. The response letter is to be signed by the Chief Executive Officer.

Please refer to the process map ‘Ombudsman WA Complaints’ via the intranet for further information.

Mediation

Some complaints about the lack of action, or dissatisfaction with action taken by the City may result from a neighbourhood dispute. When it appears that issues stem from grievances between parties, the City can offer a mediation service as provided by the Citizens Advice Bureau.

Such examples are:

- neighbourly disputes/problems, i.e. general harassment
- dividing fence issues, i.e. damage and repair of dividing fences, claims for an erected fence
- issues relating to overhanging branches and encroaching roots
- dog control, i.e. persistent barking dogs
- public nuisance disputes, i.e. high noise levels, cars/parking.

Mediation is free of charge to residents and rate payers of the City of Joondalup.

All referrals for mediation are to be directed to the Customer Relations Advocate on ext. 4942, who will coordinate the process.
Difficult complaints / complainants

Complaints, and indeed complainants, can at times be particularly challenging and unnerving. There are occasions where a customer’s behaviour may be deemed as inappropriate or unreasonable. The following situations identify these situations and the appropriate action or information to follow.

Dealing with offensive customers

Employees of the City are expected to maintain the highest standards of behaviour and conduct when delivering customer service. Politeness, patience, empathy and respect for customers must be shown at all times, as well as ensuring the provision of a quality service. Listening to customers, acknowledging how they feel (if appropriate) and attempting to assist them, may help customers appreciate the helpful manner of employees; major problems, therefore, can often be avoided.

Whilst aiming for the highest standards in customer service, it is accepted that occasionally a few customers may become abusive or use inappropriate language on the telephone, or in person. This behaviour is not acceptable and the employee should not be expected to listen to offensive language.

The corporate procedure Dealing with Offensive Customers details your rights and obligations when dealing with offensive customers.

When ending a call or meeting with a customer, and after first requesting the customer to cease the offensive behaviour, the Termination of Customer Call/Meeting form is to be completed. The form can be located on the intranet.

Please refer to the corporate procedure: Dealing with Offensive Customers on the intranet for further information.

Dealing with difficult and vexatious customers / behaviour

Whilst high standards of customer service are expected at all times, it is recognised that the actions of a minority of customers can consume an unreasonable and disproportionate amount of employees’ time. Certain instances may call for specific handling to ensure the best use of the City’s resources, avoid compromising the service to other customers and minimise distress to staff and any third party involved.

Please refer to the corporate procedure: Dealing with Difficult and Vexatious Customers on the intranet for further information.
Repetitive complaints

Similar to dealing with difficult and vexatious customers or behaviour, repetitive complaints from the same complainant and/or complaints registered about the same or similar issue require careful handling.

Please refer to the Dealing with Difficult and Vexatious Customers procedure on the intranet for further information.

Assistance after dealing with a difficult complaint/complainant

Receiving a complaint can sometimes be stressful or upsetting, particularly if the customer is especially unhappy or challenging.

If this is the case, don’t take it personally. The person is most likely angry with the situation not with you. Talk the matter over with a supervisor, coordinator or manager to help release any frustration or anger, and to help put the incident into perspective. Seeking relief from your workstation to get some fresh air, even for a few minutes, will also assist you.

The City’s Employee Assistance Program (EAP) provides access to independent counselling for employees and their immediate families for personal and work related problems. Counselling is free and confidential. To seek further information about the EAP, contact Human Resources.

Other complaint types

There are a number of complaints and situations which may require more specific handling.

Complaints spanning more than one business unit

Complaints that span two or more business units may be coordinated by the Customer Relations Advocate. This coordination ensures that:

- duplication of work by employees in different business units is avoided
- the ability for the City to manage the issues at hand is improved
- a single response can be provided to the customer, as opposed to multiple responses being sent to the same customer.

Refer to the Customer Service Coordinator on ext. 4351 for guidance.

Unsubstantiated complaints

If a complaint is found, on investigation, to have no substance, the complaint can be noted as ‘unsubstantiated’ in CRM (Tech 1). It is better to record the complaint and refer to the Customer Relations Advocate who will assist make a determination on the issue. Registering the Action
Request as ‘unsubstantiated’ is better than not to record it, particularly if the customer decides to take the matter further.

Complaints about individual employees

If a complaint is made about an employee, it is not appropriate for the employee concerned to respond directly to the customer. The employees supervisor is to determine what action is to be taken and how the response should be made. The employee will usually be requested to provide information to a supervisor, coordinator or manager who will then respond to the customer.

When responding to the customer, it is not conducive to the process to specifically detail actions taken in regards to disciplinary measures taken; however, it may be appropriate to advise the customer that the issue has been raised with the employee and is being dealt with accordingly.

For information regarding conduct of employees, please refer to the City’s Code of Conduct.

Complaints about elected members

Any complaints regarding an individual Elected Member must be directed to the Office of the Chief Executive Officer who will investigate and deal with the matter as appropriate. There are certain processes that must be followed when complaints are made against Elected Members.

Public interest disclosure (PID)

As a public authority, the City must comply with the provisions of the Public Interest Disclosure Act 2003. The Act sets out the required action if a serious allegation is made about a public authority, employee or contractor involved in improper or unlawful conduct, mismanagement of public resources, or activities that endanger the environment and public health and safety.

All PIDs must be referred to the City’s Public Interest Disclosure Officer - being the Principal Legal Officer, on ext. 4399.

Action Requests (CRM – Tech 1)

The City’s CRM (Tech 1) system provides a central system to record all complaints, compliments and requests for service lodged at the City. All complaints must be recorded on the Customer Request Management Module.

Information recorded may be released under the provisions of Freedom of Information legislation; therefore, all details should be objective, factual and not our feelings or personal opinions.

The Action Request is to remain open until the matter has been resolved and follow-up action documented. Once all actions have been documented, the request can be closed.
Overdue Action Request reminders will appear on the *Overdue Action Request Report* sent to directors, managers and coordinators if the action is not completed within the scheduled date (target date). It is the responsibility of the employee dealing with the complaint to complete Action Requests within the given time frames. The deadline for responding to complaints is seven working days.

It is accepted that some complaints will take longer to resolve, an acknowledgement must be sent to the customer and the scheduled date on the Action Request updated.

**Reports on Action Requests**

Reviewing complaints can identify improvements required in processes, procedures or employee training needs. This is achieved by examining the complaint data in Customer Service reports and is provided via the CRM (Tech 1) system.

Reports are also available via the intranet under:

Corporate > Corporate Performance Reports (left hand side).

**Training on Action Requests in CRM (Tech 1)**

Training on the Customer Request Management Module is available for staff each month and can be booked via the online training calendar on the intranet. A training manual is also available by contacting the Customer Relations Advocate on ext. 4942.
Further information

Guideline Owner: Customer Service Coordinator. Please refer to the Customer Service Coordinator on ext. 4351 for further information.

Please refer to the Customer Relations Advocate on ext. 4942 for advice on complaint handling.

Alternatively, you may seek further information via the following documents and methods:

<table>
<thead>
<tr>
<th>Document Name</th>
<th>Internal / External Document</th>
<th>Intranet</th>
<th>Internet</th>
<th>Hard Copy</th>
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<tbody>
<tr>
<td>Customer Service Charter</td>
<td>Both</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Complaint Management Protocol</td>
<td>Internal</td>
<td>Yes</td>
<td>No</td>
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<tr>
<td>Complaint Handling Process Map</td>
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<td>WA Ombudsman Complaints Process Map</td>
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<td>Mediation Process Map</td>
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<td>Elected Member Requests Process Map</td>
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<td>Mayoral Letter Process Map</td>
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<td>Community Mediation Service Brochure</td>
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