

Feedback and Complaints Management Policy

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Feedback and Complaints Management Policy		
Owner: Customer Advocate	Area: City Engagement & Experience	POL No: 216
Date of Commencement: 2005	Approval Authority: Council	Date Approved:
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1. Scope

This Policy applies to all Council staff, elected Councillors, our community and service partners. This Policy forms part of Council's Code of Conduct framework and ensures the appropriate mechanisms are in place to protect the integrity, security and reputation of Council.

This policy does not apply to complaints regarding decisions or processes that have separate statutory or other legislative appeals processes. For example, objections relating to a planning application or appeals subject to parking infringements.

2. Purpose

The City of Parramatta is committed to the delivery of high-quality services and experiences. Council values feedback and recognises the right of customers to make a complaint.

This Policy will facilitate the consistent, fair, transparent and equitable management of feedback and complaints provided by customers to Council.

This Policy:

- supports transparency and provides awareness to the community regarding Council's feedback and complaints management processes;
- provides a framework for managing feedback and complaints from the public in a fair and consistent manner;
- ensures that issues which are the subject of feedback and complaints are addressed promptly;
- ensures that all feedback is reviewed carefully;
- ensures all complaints are investigated thoroughly; and
- supports the use of feedback and complaints in continuous improvement of service delivery.

3. Guiding principles

Council's handling of feedback and complaints is guided by the following principles:

Respectful treatment	Council treats all people with courtesy and respect, including those providing feedback or making a complaint.
Accessibility	Council encourages feedback and complaints, works to identify and remove barriers and supports customers

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	through the process.
Communication	Council acknowledges all feedback, keeps complainants informed of the status of their complaint and clearly communicates decisions and the basis upon which these decisions have been made.
Ownership	Council ensures feedback and complaints are delegated to an appropriate level and that staff managing feedback and investigating complaints are suitably trained, take ownership, conduct fair and objective reviews and maintain a solutions- focused approach.
Timeliness	All complaints are acknowledged, responded to and resolved in a timely and effective manner. All feedback is acknowledged and reviewed in a timely manner.
Transparency	Council monitors and reports on feedback and complaint information and uses data collected to drive continuous improvement of its services, procedures and processes.

4. Feedback and complaints

4.1 What is a complaint?

A complaint is an expression of dissatisfaction made to Council or about Council related to Council services, performance, decisions, policies, procedures, conduct of Council officials or management of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

For example, a complaint may be made in relation to dissatisfaction with:

- the quality or accessibility of a service;
- inaction or delays in service delivery;
- policy or processes;
- the behaviour of a Council official;
- the handling of a complaint.

4.2 What is not a complaint?

A complaint covered by this Policy can be distinguished from:

- an initial request for service or action;
- feedback;
- a request for an explanation, information or progress update;
- a request to access information;

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- an appeal or representation against a decision by Council, other than that made as the result of a complaint;
- reports of failure to comply with laws regulated by Council;
- Code of Conduct complaints;
- Public Interest Disclosures;
- staff grievances;
- a matter where the subject matter is beyond Council's area of responsibility, or the subject matter is the responsibility of another authority or service provider;
- an objection of dissatisfaction in relation to a development application or determination;
- lodgement of an appeal or objection in accordance with a statutory process, procedure or policy.

4.3 What is feedback?

As outlined in Council's Customer Service Policy and Customer Service Charter, Council values and encourages customer feedback.

By telling us about their experiences, positive or negative, our customers help us to understand what we are doing well and where we need to improve.

For the purposes of this policy, feedback is defined as opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about Council, our services or complaint handling where a response is not explicitly or implicitly expected or legally required. It includes compliments, suggestions and other feedback.

4.4 How to provide feedback, a compliment or make a complaint

Council is committed to providing choice and opportunity to submit feedback, a compliment or make a complaint. Feedback, compliments and complaints can be provided to Council via the following channels:

- Website: Online feedback, compliment or complaint form
- Post: City of Parramatta, PO Box 32, Parramatta NSW 2124
- Email: council@cityofparramatta.nsw.gov.au
- Phone: 1300 617 058, Monday to Friday, 8.30am to 4.30pm
- In person: PHIVE, 5 Parramatta Square, Parramatta

5. Complaint management approach

Council has followed the NSW Ombudsman's Guidelines and model approach to implementing a complaint management system. The main components of the complaints management system are:

- Receipt of a complaint
- Acknowledgement of a complaint

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- Assess and address a complaint
- Communicate outcome and reason
- Record keeping and closure of a complaint
- 3-tier model for escalation of a complaint

5.1 Receipt of a complaint

All complaints will be acknowledged regardless of how they are received. However, due to the complexity of some matters, it is recommended that complaints be provided in writing, preferably via Council's online complaints form.

Where possible, complaints will be resolved at the first point of contact with Council. Council officers may contact the complainant to request additional information, or make arrangements, to support management of the complaint, subject to confidentiality and privacy obligations.

All complaints shall be treated as confidential, unless otherwise required by legislation or Court Process or Court Order to be disclosed (eg.GIPA). Personal information that identifies individuals will only be disclosed or used by Council as permitted under Council's Privacy Management Plan, with an individual's consent or under any other relevant legislative requirement.

5.1.1 Assistance making a complaint

Where a person prefers or needs another person, agent or organisation to assist or represent them in the making of and/or resolution of their complaint, Council will communicate with the complainant through their nominated representative if consent is provided.

Where a person requires the assistance of a translator, they may contact the Translating and Interpreting Service (TIS) on 131 450 and request the interpreter contact City of Parramatta's Customer Service Centre on 1300 617 058.

Where a person has communication support needs, they may visit www.accesshub.gov.au to connect with the National Relay Service. After expressing their preferred method of support, the person may then request the National Relay service contact the City of Parramatta's Customer Service Centre on 1300 617 058.

Where a person has other support needs, Council will facilitate access with sensitivity and understanding, supporting them in ways that meet their individual requirements and is appropriate to their age, abilities, culture and linguistic background.

5.1.2 Complaints provided to Councillors

Where a complaint has been provided to a Councillor, the complaint is to be forwarded to the Office of the Chief Executive Officer to be managed in accordance with this Policy and procedures.

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5.1.3 Complaints made via social media

Complaints made via social media often do not contain sufficient information to support investigation. Where a matter is significant in nature and sufficient information has been provided it will be treated as a complaint.

5.1.4 Anonymous complaints

Where appropriate, Council will record anonymous complaints and act on them where the matter is of a serious nature, or where there is sufficient information provided at the time the complaint is lodged.

5.1.5 Complaints involving multiple parties

Where complaints relating to a singular issue are made by related parties, Council will arrange communication with a single representative of the group with the consent of all related parties.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas, Departments or Directorates within Council, communication with the complainant and/or their representative will be coordinated and where possible a singular point of contact will be provided.

5.2 Acknowledgment of a complaint

Council will acknowledge receipt of the complaint with the complainant within three (3) business days and advise of the following:

- the complaint has been received by Council;
- the complaint reference number;
- the complainant will be contacted within ten (10) business days with a resolution, or for more complex issues, an estimated timeframe for resolution.

5.3 Assess and address a complaint

Each complaint will be assessed on its merits with integrity and in a fair, objective, equitable and unbiased manner. The following factors will also be taken into consideration during the assessment process:

- the seriousness, complexity and urgency of the complaint;
- whether the complaint raises concerns related to health and/or safety;
- how the complainant is being impacted or affected;
- potential risks associated with any delay in resolution of the complaint;
- whether resolution of the complaint requires the involvement of other parties.

Where a matter raises awareness of a risk to safety or security the response will be escalated appropriately.

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Council will ensure the complaint is allocated to the appropriate officer for investigation. The appropriate officer will not be a staff member whose conduct or service is the subject of the complaint.

After the initial assessment the Council officer will consider the best approach to managing the complaint and may:

- provide an explanation to the complainant;
- gather further information from the person or area the complaint is about;
- request information from the complainant as to their desired outcome;
- investigate the claims made in the complaint; or
- refer the complaint to an appropriate external agency

5.4 Communicate outcome and reason

The complainant will be provided with an outcome within ten (10) business days, or for more complex issues, an appropriate timeframe. Actions taken will be tailored to each case and take into account any statutory requirements.

Upon reaching an outcome for the complaint the Council officer will communicate to the complainant:

- the outcome or actions to be taken;
- the reasons for any decisions made;
- the options for review.

5.5 Record keeping and closure of complaint

Throughout the complaint management process detailed records will be maintained by Council. Information gathered, including all correspondence, investigation notes, actions taken and resolution provided, will be recorded within the confidential complaint file within Council's secure corporate record management system.

Upon completion of the complaints management process, after the final resolution has been provided to the complainant, the complaint will be formally closed.

5.6 Three-tier model for escalation of a complaint

Council has adopted the NSW Ombudsman's three-tier model for the escalation of complaints. The model has been adapted to reflect the role of the Internal Ombudsman Shared Service (IOSS) in the City of Parramatta's complaint's management process.

Tier 1 (initial)	Where a complainant is not satisfied with the management or outcome of a complaint made to Council, they may request an internal review of the decision by a more senior officer within Council.
Tier 2	Where a complainant is not satisfied with the management or outcome of a complaint made to Council, they may choose to contact Council's Internal Ombudsman Shared Service (IOSS).
Tier 3	If the complainant is dissatisfied with the outcome of Council's review

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	of their complaint and/or the review conducted by the IOSS, the complainant may seek a review of the decision through an external agency.
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6. Internal Ombudsman Shared Service (IOSS)

Council's Internal Ombudsman Shared Service (IOSS) assesses complaints in line with its [Governance Charter](#) to determine whether it is a matter it will investigate. The complaint may then be investigated by the IOSS, or by an external investigator appointed by the Internal Ombudsman.

In some circumstances, in which the complaint is serious in nature, the IOSS may commence its enquiries in relation to a complaint prior to it being investigated by Council. The Chief Executive Officer may also refer a complaint directly to the IOSS without or prior to the complaint being investigated by Council.

Where relevant, a complaint concerning a Council official will be reviewed by the IOSS in accordance with Council's [Code of Conduct](#) and the associated procedure.

The IOSS will be unable to investigate where:

- the complaint has not been previously lodged with Council (unless determined serious in nature);
- the complainant had knowledge of the matter for more than six months without taking action or reporting their concerns;
- insufficient information has been provided;
- the complaint does not relate to a Council function;
- the complaint requires referral to an external agency; or
- the complaint is determined to be frivolous, vexatious, not made in good faith or concerning a trivial matter.

Complaints may be submitted to the Internal Ombudsman Shared Service via:

- Website: [Online IOSS complaints form](#)
- Email: internalombudsman@cityofparramatta.nsw.gov.au

Further information about the role of IOSS is available on Council's website.

7. External agencies

Where a complaint is of a serious nature, or a complainant is dissatisfied with an outcome, the complainant may wish to refer the matter to one or more of the following external agencies:

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- [The Office of the NSW Ombudsman](#)
- [The Independent Commission Against Corruption \(ICAC\)](#)
- [The Office of Local Government \(OLG\)](#)
- [The Information Commissioner](#)
- [NSW Police](#)

8. Complaints involving a child or young person

Council upholds and promotes the safety and wellbeing of children and young people in our community and Council recognises that Child Protection is everyone's responsibility.

Complaints and allegations against Council officials, contractors, sub- contractors, work experience participants, volunteers, students on placement, facility hirers and lessees involving a child or young person will be handled by the IOSS in accordance with relevant legislation, specifically the Children's Guardian Act 2019 (NSW).

9. Unreasonable conduct by a complainant

Unreasonable conduct is defined as any behaviour by a person which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the people involved in the complaint process.

Council will utilise NSW Ombudsman's Managing Unreasonable Conduct by a Complainant Guidelines to assist in the identification of unreasonable conduct and to identify strategies to address that conduct.

Council has a zero-tolerance policy towards any harm, abuse or threats directed towards Council staff and Council officials.

10. Feedback management

All compliments and feedback received will be acknowledged:

- immediately, where lodged verbally;
- by the provision of a reference number, where provided in writing, by email or lodged via Council's online feedback or compliments forms.

All compliments and feedback will be reviewed and allocated to the relevant Council leader.

11. Accountability and learning

In order to improve Council's service delivery and enhance customer and community

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experience, feedback and complaints are regularly reviewed and reported. Review and analysis is an important part of the continuous improvement process. Potential improvements and systemic issues are identified, addressed and learnings applied.

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12. Definitions

Complaint	A complaint is an expression of dissatisfaction made to Council or about Council related to Council services, performance, decisions, policies, procedures, conduct of Council officials or management of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
Feedback	Opinions, compliments, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, our services or complaint handling where a response is not explicitly or implicitly expected or legally required.
Unreasonable conduct	Unreasonable conduct is defined as any behaviour by a person which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the people involved in the complaint process.
Service request	The definition of a service request includes: <ul style="list-style-type: none"> • requests for the provision of works or services; • routine inquiries about the organisation's business; • requests for the provision of services and assistance; • reports of failure to comply with laws regulated by the organisation; and • requests for information or explanation of policies, procedures and decisions.
Grievance	A clear, formally written statement by an individual staff member about another staff member or a work-related matter.
Public Interest Disclosure (PID)	A report alleging wrongdoing made by a public official in New South Wales that meets the requirements of the Public Interest Disclosures Act (2022)
Council official	Any person who performs official functions for or on behalf of Council. This includes: <ul style="list-style-type: none"> • Councillors; • the Chief Executive Officer (CEO); • Council staff and administrators; • delegates of Council, including members of Council committees; • any person to whom Council's Code of Conduct applies.
Child	A person who is under the age of 16 years.
Young person	A person who is over the age of 16 years abut under the age of 18 years.

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13. Supporting information

<p>City of Parramatta policies and documents</p>	<ul style="list-style-type: none"> • Code of Conduct incorporating the Procedures for the Administration of the Code of Conduct for Local Councils in NSW • Grievance and Dispute Handling Policy • Privacy Management Policy • Public Interest Disclosures Policy • Work Health and Safety Policy • Internal Ombudsman Shared Service Governance Charter • Councillor and Staff Interaction Policy
<p>Relevant external governing laws and guidelines</p>	<ul style="list-style-type: none"> • Local Government Act 1993 (NSW) • Effective Complaints Management Guidelines (2024), NSW Ombudsman • Public Interest Disclosure Act 2022 (NSW) • Managing unreasonable conduct by a complainant (2021), NSW Ombudsman • Privacy and Personal Information Protection Act 1998 (NSW) • Ombudsman Act 1974 (NSW) • Children’s Guardian Act 2019 (NSW) • Government Information (Public Access) Act 2009 (NSW) • Independent Commission Against Corruption Act 1998 (NSW) • State Records Act 1998 (NSW)

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