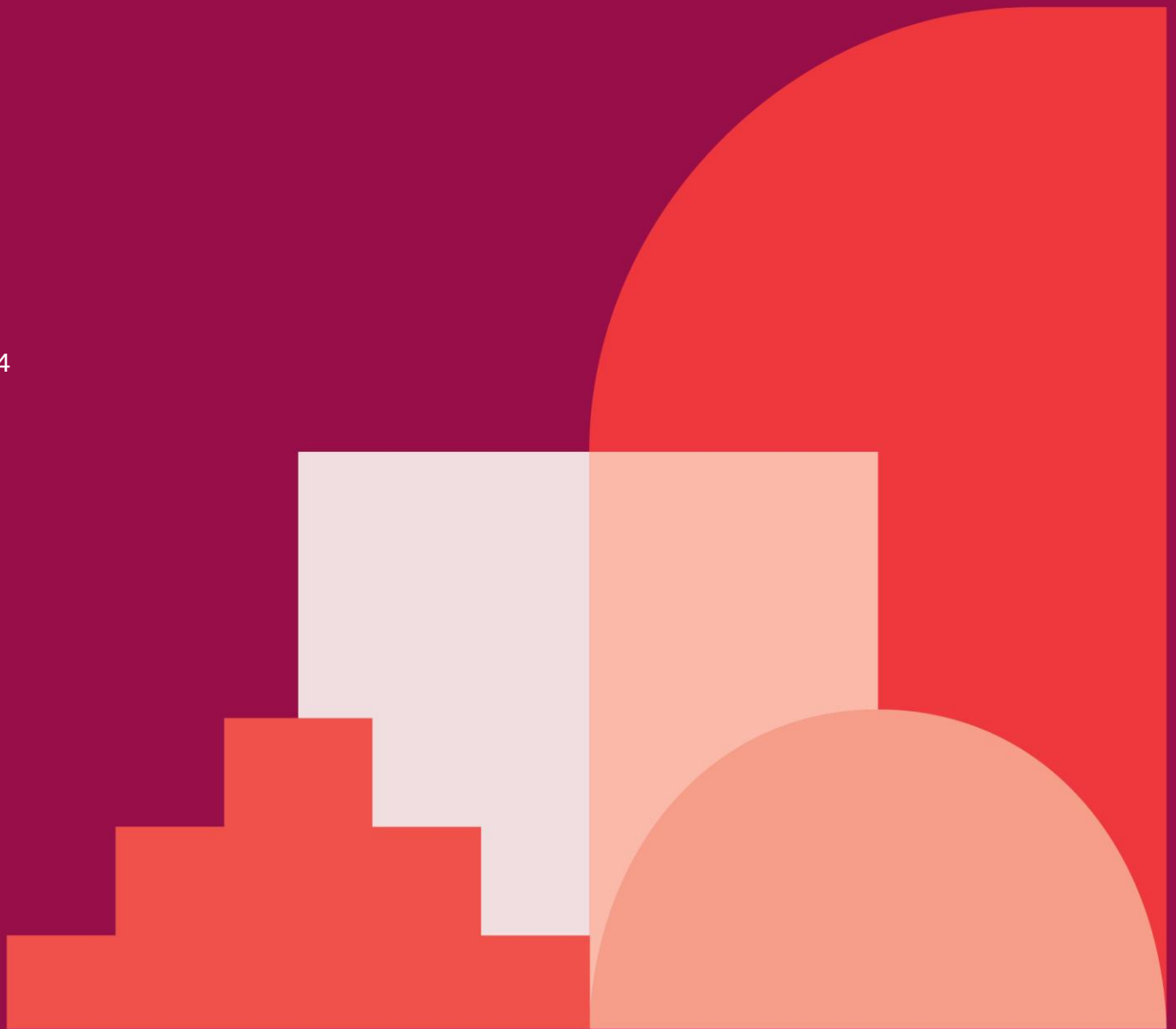


Complaints Handling Policy

V4



Title	Complaints Handling Policy
Summary	This policy sets out how Inner West Council manages complaints in a consistent, proactive and measurable way. It aligns with the NSW Ombudsman's Complaint Management System model and supports fair, transparent and accountable handling of complaints. The policy also helps Council use complaint outcomes to continuously improve services and staff conduct.
Document Type	Policy
Relevant Strategic Plan Objective	Strategic Direction 5: Progressive responsive and effective civic leadership.
Legislative Reference	• <i>Local Government Act 1993</i> • <i>Effective Complaints Management Guidelines, NSW Ombudsman (2024).</i> • <i>Complaints Management Framework, Ombudsman New South Wales (June 2015).</i> • <i>Managing Unreasonable Conduct by a Complainant Manual – NSW Ombudsman (2021)</i> • <i>Managing Unreasonable Conduct by Complainants, NSW Ombudsman Model Policy (July 2022)</i>
Related Council Documents	• Code of Conduct Inner West Council and the procedures for Administration of the Code of Conduct • Customer Service Charter • Councillor and Staff Interaction Policy • Code of Meeting Practice • Internal Ombudsman Shared Service Governance Charter • Public Interest Disclosures Policy • Public Access to Information Policy • Statement of Business Ethics
Version Control	See last page

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1 Purpose

The purpose of this policy is to:

- Provide a clear and transparent process for making and managing complaints
- Help staff respond to complaints fairly, effectively and on time
- Strengthen community confidence in Council's processes
- Guide Council in managing complex complainant behaviour
- Identify external agencies to refer serious matters to
- Support continuous improvement in Council's services, staff conduct and complaint handling.

2 Scope

This policy applies to all Council staff, elected councillors, community members and service delivery partners.

Complaints about staff grievances, breaches of the Code of Conduct, or public interest disclosures are handled through separate processes. For further information, see the 'Related Council Documents' on page two.

3 Definitions

The Complaint Handling Policy uses the following definitions:

Councillor	An elected representative of Inner West Council.
Council Officer	A member of Inner West Council staff. This includes full-time, part-time, casual and contracted staff.
Act	The Local Government Act 1993
Complaint	Any expression of dissatisfaction about the level or quality of Council service. This may include dissatisfaction with: • Not meeting expected service standards • Delays in response or acting • Behaviour or attitude of Council staff • Council's administrative actions including decision or policy • Withdrawal or reduction of a service.
Complainant	The person or group making a complaint.

What is not a Complaint	Contact with Council as part of normal business is not a complaint. This includes: • Service Requests • Requests for information • Clarification of policies, procedures, or decisions • Dissatisfaction with policies or procedures that Council must follow under law • Formal objections made through standard Council processes, including: ○ Notification of a Development Application ○ Public exhibition of projects, policies and other initiatives.
Service Request	A 'service request' is a request for Council to provide a service or take action. Examples include: • Waste collection, park maintenance or tree trimming • Fixing hazards such as fallen trees or potholes • Seeking approvals, including development approvals or tree permits • Accessing information about Council operations • Asking for clarification of policies, procedures, or decisions • Reporting concerns about neighbours or their properties.
Feedback	Feedback includes positive or negative comments, opinions or reactions. It may include: • Compliments about good service • Suggestions for improvements • Complaints about the quality of a Council service.
Review of Complaints	An independent review of complaint outcomes: • Examines how a complaint was handled and resolved • Is conducted by a person or body not involved in the original decision • Assesses whether the process was fair • Assesses whether the outcome was appropriate
Internal Ombudsman Shared Service	An independent service providing an alternative way to review complaints about Council's: • Administrative conduct • Unethical behaviour • Misconduct, or corrupt conduct • Maladministration.

4 Statement

Inner West Council is committed to handling complaints fairly, respectfully, accessibly and promptly. We see complaints as valuable feedback and a way to improve decision-making, services and accountability.

Complaints will be managed impartially, without disadvantaging the person making the complaint, and in a way that promotes transparency, fairness and ongoing improvement across Council services and conduct.

5 Organisational Commitment

Council expects staff to follow this policy and manage complaints fairly, effectively and transparently.

All Council Staff	Staff must respond to complaints in line with Council's Service Charter by: • Taking ownership of complaints allocated to them • Providing timely feedback on issues raised, in line with this policy • Keeping accurate records of complaint handling • Suggesting ways to improve Council's processes and services • Learning from complaints to support continuous improvement
General Manager	The General Manager fosters a culture that values complaints and supports effective resolution. This includes guiding staff in how to respond to appropriately, reviewing complaint trends, using feedback to improve quality management and encouraging staff to suggest service improvements.
Councillors	When residents raise complaints directly with Councillors, Councillors must refer the complaint to the relevant Director, Manager or the General Manager in line with the Councillor and Staff Interaction Policy.
Internal Ombudsman (IOSS)	The IOSS reviews and investigates complaints in line with the Internal Ombudsman Shared Service Governance Charter. The IOSS also: • Helps develop a fair, consistent and transparent complaints-handling framework • Provides regular reports on issues and identifies potential systemic problems • Educates and supports staff involved in complaint management and explains the role of the IOSS.

Customer Complaints Specialist	The Customer Complaints Specialist coordinates, monitors and supports the resolution of complaints to ensure best outcomes for customers. They also promote feedback, support continuous improvement across Council services and manage complex complaints that span multiple Council areas or involve multiple complainants.
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6 Guiding Principles

Council is committed to delivering high quality services to the community. Complaints will be handled courteously, investigated thoroughly and resolved efficiently and appropriately, in line with Council's Customer Service Charter.

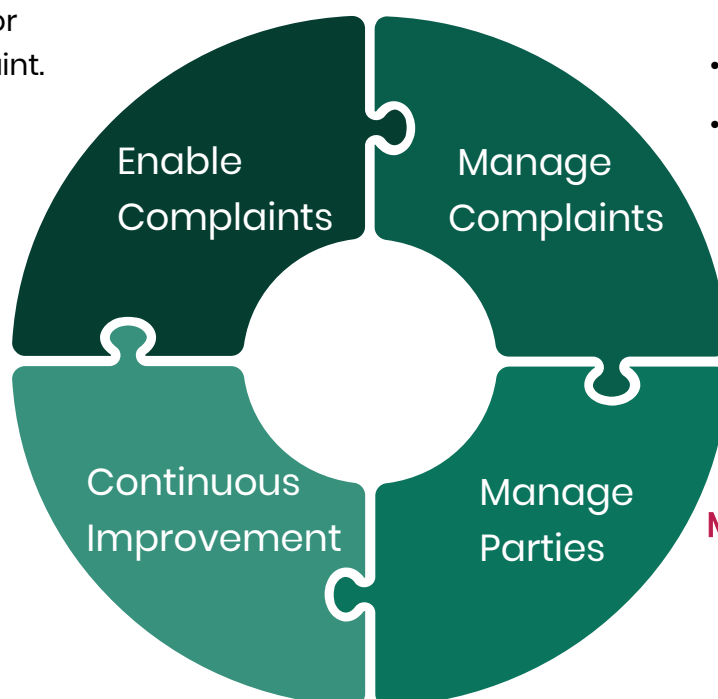
Council has based its complaint handling practices on the NSW Ombudsman's Guiding Principles and model approach.

Enable Complaints

- Keep focus on people
- Make sure no one is disadvantaged for making a complaint.
- Allow complaints to be made anonymously
- Make the process accessible to everyone

Continuous Improvement

- Identify common issues or trends.
- Look for opportunities to learn, improve services and make the customer experience better.



Manage Complaints

- Resolve complaints quickly and respond within timeframes.
- Be fair and impartial.
- Protect privacy and keep information confidential.

Manage Parties

Complaints involving:

- Multiple Council service areas.
- More than one person.
- Complex customer behaviours.

Enable Complaints

People First	Council wants feedback on our services, systems, practices, procedures, and how we handle complaints. Complainants will be: • Listened to and be treated with respect • Told how the complaint will be handled and the ways to make complaints • Advised of timeframes for resolution • Kept updated throughout the process • Given clear reasons for decisions • Advised of options for review if they are dissatisfied.
No Negative Consequences to Making Complaints	Council will take every reasonable measure to make sure complainants are not penalised, whether they complain for themselves or for someone else.
Anonymous Complaints	Council will accept and investigate anonymous complaints, if enough information is provided. • Council cannot provide updates, follow-ups or outcomes for anonymous complaints • Providing contact details is preferred to allow Council to share information and communicate results.
Accessibility	Council will make sure information on how to complain is: • Easy to find • Clear and easy to understand • Accessible to everyone. Complaints can be made through: • A third party representing the complainant • The National Relay Service (NRS) • Translating and Interpreting services (TIS International) • Multiple channels to accommodate community needs, including phone, in person and in writing. Refer to section '8. How to Lodge a Complaint' for further details.

Manage Complaints

Early Resolution and Responsiveness	Council aims to resolve complaints at first contact whenever possible or within timeframes set out in section 9.
Fairness and Objectivity	• All complaints will be handled fairly and without bias • Complaints about staff behaviour or service will be reviewed by someone independent of the staff member involved. Constructive feedback may be given • Reviews of how a complaint was handled will be done by a different decision maker and may be referred to the Internal Ombudsman for independent oversight.
Confidentiality And Privacy	Council will protect a complainant's identity whenever practical. Any information collected will only be used to investigate the complaint.
National Disability Insurance Scheme (NDIS)	Council will take reasonable steps to report complaints involving people with disability to the NDIS Commissioner. This includes complaints about: • Death or serious injury • Abuse or neglect • Unauthorised restrictive practice • Unlawful sexual or physical contact, or assault • Sexual misconduct, including grooming.
Public Interest Disclosure	A Public Interest Disclosure is a report of wrongdoing made by a New South Wales public official under the Public Interest Disclosures Act 2022. For more information please see Council's Public Interest Disclosures Policy on the Policies register - Inner West Council (nsw.gov.au) or contact the Internal Ombudsman, Council's Public Interest Disclosure Coordinator.
Child Protection Complaints	Child safety is everybody's responsibility. Council is committed to a child-safe community for children (under 16) and young people (16–18). This includes following child protection laws and standards, such as: • Allegations against staff – Children's Guardian Act 2019

	• Mandatory reporting of risk of significant harm – Children and Young Persons (Care and Protection) Act 1998 • Selection and recruitment standards –Child Protection (Working with Children) Act 2012 • Child-safe organisation standards– Principles for Child-Safe Organisations and the Royal Commission Recommendations Report (2017). If safety and welfare of children or young people are at risk, follow the Child Protection Protocol and Procedures. • Report concerns to the Child Protection Helpline: 13 21 11.
Penalty Notices	For assistance on how to manage or review a fine, refer to Service NSW .

Managing Complaints Involving Multiple Organisations and Multiple Parties

- Council will, where possible, work collaboratively with other organisations, when needed, to make sure communication with the complainant is clear, coordinated and timely.
- The Customer Complaints Specialist will coordinate complaints involving more than one area of Council.
- If similar complaints come from more than one person, Council will, where possible, speak with a single representative.
- If a single representative is not possible, Council will take steps to make sure everyone is given the same information and advice.

Complex Complainant Behaviour

Council understands some complainants may behave in ways that make resolving complaints challenging. This may include persistent, demanding, aggressive, or disruptive behaviour that affects staff wellbeing.

Council will manage such behaviour fairly, while keeping staff and the community safe and respected.

The categories below describe types of complex complainant behaviour and support a consistent and fair approach to managing such behaviour.

Five categories of complex behaviours are:

Excessive Persistence	Complainant is refusing to accept their complaint has been closed and is contacting Council repeatedly about the same issue.
Excessive Demands	Complainant is raising issues beyond Council's responsibility or is asking for solutions that are not practical or will impact services.
Disruptive Lack of Cooperation	Complainant is - Refusing to provide requested information - Giving false or misleading information - Being unclear about the complaint details - Changing details of the complaint with each contact.
Illogical Arguments	Complainant is raising issues that are: - Exaggerated - Not based on reason or logic - Confusing, false, inflammatory, or trivial - Irrational or focusing on conspiracy theories.
Unjustified Conduct	Complainant is rude, aggressive, threatening violence or abusive towards staff.

Managing Complex Complainant Behaviour

The General Manager will review cases of complex or disruptive behaviour and may approve measures to manage future interactions with Council.

To protect staff wellbeing, maintain service standards and use resources effectively, the General Manager may:

- Appoint a single point of contact for all future communications
- Limit communication channels, for example, contact Council only by phone or email
- Arrange alternative contact through a nominated representative

- Limit the issues the complainant can raise if they have already been fully reviewed
- Refuse service or require the customer to leave Council premises
- Involve law enforcement if necessary
- Introduce temporary or permanent bans from Council facilities.

Notifying Complainants and Reviewing Restrictions

Council will notify complainants in writing if their contact is changed or restricted.

- If the complex behaviour does not pose a health or safety risk, Council will issue a warning letter asking the complainant to stop the behaviour.
- Complainants can appeal to have any restrictions or changes reconsidered. The appeal will be reviewed by a senior staff member who was not involved in the original decision.

Council will review restrictions to decide whether they should continue, be changed or be removed. Reviews will be conducted:

- Within 12 months of the restrictions being imposed
- Every three or six months, depending on the service affected.

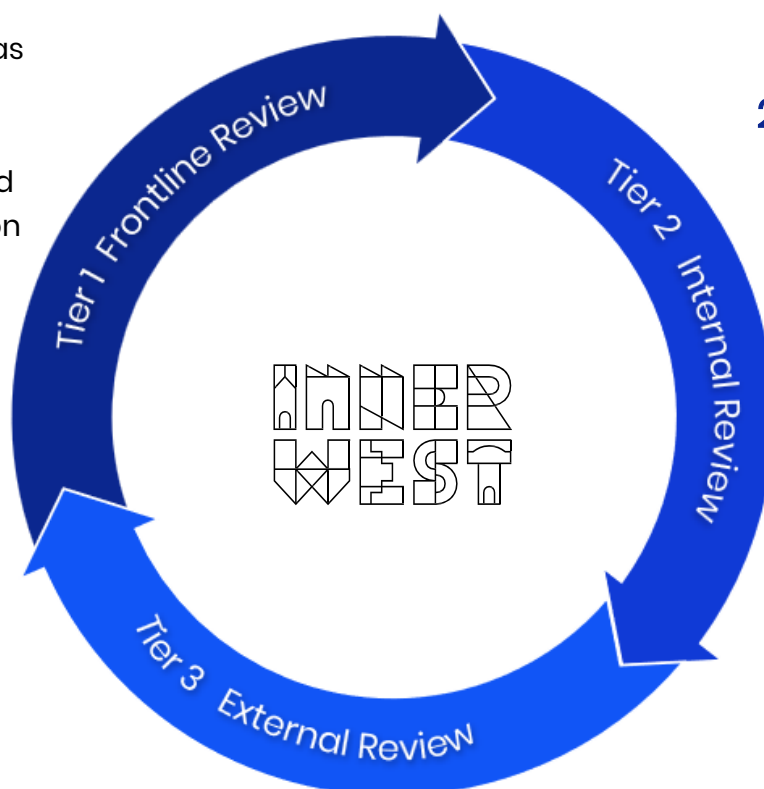
Council follows the 'NSW Ombudsman's Managing Unreasonable Conduct by Complainants Model Policy 2022' when issuing warnings, handling appeals or conducting periodic reviews.

7 Three Levels of Complaint Handling

Council uses a three-tier approach to handle complaints. This helps to respond to and resolve complaints quickly based on how serious they are and where they are in the process. This approach is based on the NSW Ombudsman's *Effective Complaint Handling Guidelines*.

1 Frontline Review

Service areas investigate, take action and respond to the person making the complaint.



2 Internal Review

Internal Ombudsman Shared Service (IOSS) conducts an independent review.

3 External Review

A relevant external body conducts an independent review.

Three levels of complaint handling:

Tier One Frontline Complaints Handling	Council aims to resolve complaints as quickly as possible at the first level. This involves the relevant service area investigating the issue, taking action, and responding. Tier One complaints can be handled by the: • Frontline Customer Service Officers • Staff responsible for providing the service • Immediate supervisor of the staff providing the service • Responsible service manager • Customer Complaints Specialist • Responsible Director • General Manager Staff can escalate a complaint to a higher-level officer for review if needed. The outcome of this review will be shared with the complainant.
Tier Two Internal Review Internal Ombudsman Shared Service (IOSS)	Where a complaint is not resolved at Tier One or the complaint raises serious or systemic issues, Council may refer the complaint to the IOSS for an independent review. The IOSS provide an independent way to review complaints about Council's: • Administrative conduct • Unethical behaviour • Misconduct • Maladministration.
Tier 3 External Review	If a complainant is not satisfied with Council's response to their complaint and the IOSS review, they may seek a further review from a relevant Government body or regulatory agency. External findings or recommendations may also highlight opportunities for Council to improve its systems.

The process for handling a complaint is the same at every level.

8 How to Lodge a Complaint

TIER 1 - Frontline Complaints Handling by Council Staff	
 Inner West Council  Let us know how we are doing.  council@innerwest.nsw.gov.au  (02) 9392 5000  Mobile Customer Service  Customer Service Centres – Monday to Friday 8:30 am to 5 pm Ashfield Customer Service Centre 260 Liverpool Road, Ashfield NSW 2131 Leichhardt Customer Service Centre 7-15 Wetherill Street, Leichhardt NSW 2040 Petersham Customer Service Centre 2-14 Fisher Street, Petersham NSW 2040  PO Box 14, Petersham NSW 2049	
 National Relay Service (NRS) Help for people with hearing or speech difficulties Contact the organisation you need through the NRS.  www.accesshub.gov.au/about-the-nrs  1800 555 660	
 Telephone Interpreter Service (TIS) We can organise an interpreter through TIS, or you can contact TIS yourself before speaking with us.  www.tisinternational.gov.au  131 4500	

TIER 2 - Internal Review	
Internal Ombudsman Shared Service	
	Internal Ombudsman
	(02) 8757 9044
	internalombudsman@innerwest.nsw.gov.au
	11 Northumberland Road Auburn NSW 2144

TIER 3 External Review	
NSW Ombudsman  www.ombo.nsw.gov.au  (02) 9286 1000 or 1800 451 524  nswombo@ombo.nsw.gov.au  Level 24,580 George Street SYDNEY NSW 2000	NSW Office of Local Government  www.olg.nsw.gov.au  (02) 4428 4100  olg@olg.nsw.gov.au  Locked Bag 3015 NOWRA NSW 2541
The Independent Commission Against Corruption (ICAC)  www.icac.nsw.gov.au  02 8281 5999  Complete an online form  Level 7, 255 Elizabeth Street SYDNEY NSW 2000	Information and Privacy Commission NSW  www.ipc.nsw.gov.au  1800 472 679  ipinfo@ipc.nsw.gov.au  GPO BOX 7011 SYDNEY NSW 2001

9 The Complaint Management System

When handling complaints, staff must follow this policy, relevant laws and regulations, and any internal guidance on managing complaints.

Good record-keeping practices must be followed for all complaints. Council will keep complaint records in an organised way so they can:

- Be easily accessed for analysis, reporting and monitoring trends
- Help assess the quality of customer service and overall customer experience
- Support improvements to services and make the customer experience better.

Service Standards for handling complaints:



Within 1 Business Day	
Record	As soon as the complaint is received, it will be recorded with the following details: • A unique identifier and the date the complaint is received • Contact details of the complainant • Details of the complaint as reported • Any correspondence generated to acknowledge the complaint has been received.
Acknowledgement	A Council officer or Customer Complaints Specialist will acknowledge the complaint and provide information about the complaint handling process and next steps.
Initial Assessment	The Council officer or Complaints Specialist will review the complaint and any relevant history to decide the appropriate course of action.
Allocation	Complaints will be assigned to the most suitable Manager or Senior Manager to take responsibility. Complaints from IOSS, external agencies, complex complaints, or those involving multiple services may be allocated to the Customer Complaints Specialist for coordinated case management.

Within 10 Business Days	
Assessment	Council will consider: • Whether the issue affects community health or safety risks • If urgent action is needed to prevent harm • Whether concerns and expected outcomes are within Council's control • How the complainant is impacted • Any previous related requests or complaints • Whether the complaint should be handled under other rules, such as the Code of Conduct or the Public Interest Disclosures.

Investigation	To manage a complaint, Council may: • Investigate the claims made • Collect information from the relevant service area or staff member • Contact the complainant for more information or to provide updates, explanations or clarifications.
Resolution	After assessment and investigation, the Service Manager or Customer Complaints Specialist will advise the complainant of: • The outcome or resolution of the complaint • Reasons for the decision • Any actions Council will take or proposed solutions to resolve the matter • Options to request a review if the complainant is unhappy with the response. All complaints will receive a response in writing.
Communication	The Service Manager or Customer Complaints Specialist will keep the complainant or agency informed about: • Progress or any reasons for delay • Expected timeframes for actions or resolution.
Record Keeping and Review	Council will maintain accurate records of all stages of the process, including: • How it was handled • Outcomes or resolution • Any outstanding actions to follow up. Council will make sure agreed outcomes and actions are implemented. Council will regularly review how complaints are handled, including feedback from complainants, to find ways to improve processes and make the experience better for both complainants and staff.

Beyond 10 Business Days	
Delays in Reaching a Resolution	Some complaints may be complex and take longer than 10 business days to resolve. The complainant will be kept informed of any changes in the expected timeframe.

Council will clearly explain when a complaint is considered closed and provide the complainant with information about relevant external agencies they can contact if they do not agree with the outcome.

10 Accountability and Learning

The Complaints Handling Policy and complaint management practices will be regularly monitored and reviewed to make sure they remain effective in responding to and resolving complaints and continuous service improvement.

Complaints will be subject to structured periodic review to identify trends, assess performance and inform learning and improvement opportunities across Council.

11 Breaches of this Policy

If Council officers do not follow this policy, an investigation may be conducted under relevant Council policies, including the Model Code of Conduct.

Any suspected criminal offence or corrupt behaviour will be referred to the appropriate external agency.

12 Administrative Changes

From time to time, minor administrative updates may be needed because of changing circumstances.

Changes that do not significantly affect the content, such as updates to branding, officer titles, departments, or the names of legislation, may be made without formal approval.

13 Version Control – Policy History

This policy will be formally reviewed every three years from the date of adoption or as required.

Governance use only:

Document	Complaints Handling Policy	Uncontrolled Copy When Printed	
Custodian	Customer Complaints Specialist	Version #	Version 4
Adopted By	Council	ECM Document #	35466042
Next Review Date	21 April 2029		

Amended by	Changes made	Date Adopted
Director Corporate	Simplify Language and Refine Process.	26 October 2021
Customer Complaints Specialist	Updated in line with current practice.	13 February 2024
Customer Complaints Specialist	Minor Updates approved by the General Manager.	22 August 2024
Customer Complaints Specialist	Minor administrative updates, presented in plain English, that do not affect the content of this policy.	21 April 2026