

Review of CP-101 Complaints Management Policy

Dear Mayor, deputy Mayor and Councillors,

This is an important opportunity for Council to make systemic improvements to its complaint handling, investigation, and resolution policies to reflect the various learnings and improvement recommendation from past investigations into the City Administration's conduct and performance, inclusive of complaints against the Chief Executive Officer.

It is a matter of public knowledge that there has been longstanding discontent with the way the City and Council has dealt with complaints in relation to its performance. For example:

- **The 2017-19 Authorised Inquiry into the City of Melville** found deficiencies with the City's complaints management, and the June 27, 2019 report recommend, amongst other things, *"That consideration be given by the Council to engage an independent person to review and act on complaints about City processes and decisions for a period of 3 months from the date of this report."*
- **That Final Complaints Review report, undertaken by Customer Science, was finalised on January 10, 2020**, as attached below, also found fault with the City's complaint management. It made several recommendations.
- **The 2021 Bronwyn Weir Investigation** into a small sample of longstanding complaints, that was initiated by Council, found that the City Administration's conduct in dealing with several complaints was unacceptable, unreasonable and resolution has taken far too long, if at all.
- **Electors overwhelmingly passed a motion** at the February 6, 2023 Annual General Meeting calling on Council to improve its complaint investigation and resolution policies.
- **The Department of Local Government** has expressed its concerns with the City's governance in its February 28 letter to CEO Marten Tieleman.
- Mayor George Gear and the CEO could not or would not answer our questions put to the April 18 OMC about complaint statistics, post Mayor George Gears March 25 statements published in the Fremantle Herald. The Mayor and CEO stated:
"In accordance with clause 6.10(h) of the City of Melville Meeting Procedures Local Law 2022, the Presiding Member ruled an answer to this question would not be given, as the research involved would divert a substantial and unreasonable portion of the City's resources away from its other functions."

There are still issues and a lack of transparency of the City's complaints management, investigations, and resolution. This continues to adversely impact the community's confidence in Council's oversight and governance of the City's administration and resources.

Governance is at the heart of Council's roles; and good governance requires from time to time the governing bodies to oversee, investigate and resolve complaints about their organisations. This is good practice.

Council's Governance and FMARC committee Charters have been delegated duties that would benefit for greater transparency of complaints as a mechanism to identify risks and systemic compliance and governance problems.

We recommend Council amend its Customer Complaints Policy along the following lines.

1. Consistent with the Customer Science January 10, 2020 report and recommendations (page 5 and 20 below):
 - 1.1. Add a definition for a category of complaints called “Executive Complaints”. That is, complaints that have been directed to Council, the CEO or known to be referred to external bodies.
 - 1.2. Add a requirement for the CEO to complete a root cause analysis on all complaints. A more detailed bespoke root cause analysis is to be undertaken for Executive Complaints.
 - 1.3. Add the requirement for the CEO to maintain a centralised complaint registers, inclusive of Executive Complaints, and make that available to Elected Members in real time.
 - 1.4. Add the requirement for the CEO to maintain a centralised continuous improvement register for all improvement activities that are generated from complaint, with clear ownership and timeframes, and make that available to Elected Members in real time. We recognise that such a register may be a subset of a register the City keeps for all its continuous improvement initiatives.
 - 1.5. Add the requirement for the CEO to formally review the complaints and continuous improvements register, in relation to Executive Complaints, with Council, every 3 months. The review should include a summary of complaints for the period, exceptions in the data, root cause findings, lessons learnt, improvement opportunities and resolutions proposed to or accepted by the complainant(s).
 - 1.6. Add the requirements for the CEO to track all complaints in Pathway, or equivalent system.
 - 1.7. Add a requirement for the CEO to automate service level agreement performance and reporting.
2. Elected Members should be provided a mechanism to ‘Call-up’ any Executive Complaint to Council consistent with the “calling-up” development applications to Council. This approach enables a critical escalation path (page 21) for long standing or problematic complaints so that Council can make decisions to further investigate, dismiss and/or resolve the complaint.
3. Council should direct the CEO to include a section in the annual report on complaints, investigations, and resolution performance over the preceding year. Such a report should spell out, at a minimum, the general complaints statistics, a summary of the root causes, key lessons learnt, and improvement opportunities pursued.

Finally, we strongly urge you all to look for ways to improve Council’s governance of the City’s administration. Improving Council’s oversight, investigation, resolution and governance of complaints against the City’s administration will help improve the community’s confidence in Council.

Yours sincerely,

City of Melville Residents and Ratepayers Association



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Science

We bring service transformation to life.



City of Melville Final Complaints Review

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Customer Science

Version: v.3

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Revision

Version	Description	Author	Release Date
V1	Initial draft – internal only		8 January 2020
V2	Draft for review		9 January 2020
V3	Final for distribution		10 January 2020

Executive Summary

The City of Melville has established a very solid complaints management framework and, in the main, handles its complaints highly effectively. Its policy and procedures have been certified under the Customer Service Institute of Australia's Customer Complaints Framework in March 2019.

The City of Melville was however the subject of a review by the Western Australian Department of Local Government, Sport and Cultural Industries in 2018/19 and as a result of the authorised inquiry, a report with recommendations was released in June 2019 (Inquiry Report). In part, key recommendations from the report were that the City of Melville:

- Independently review the City of Melville's complaints management processes
- Review decision resolution for complaints from 27 June for a period of three months in accordance with recommendation two (2) of the Inquiry Report.

Customer Science was selected to undertake the independent review. An initial report was completed and provided on 19 December 2019 and this report constitutes the final report inclusive of a detailed review of confidential complaints which for the purpose of this report are called **Executive Complaints**.

Based on our review, Customer Science believes that there are robust and quality policies, procedures and systems in place to manage the complaints made to the City. It has also found that:

- complaints that are registered through the workflow and system of record, **Pathways**, were consistent in volume and nature to the volume of services, service requests and residents and not inconsistent with our experience in dealing with other councils and entities.
- in the main, Pathways complaints were adequately dealt with in line with the documented policy and procedures delivering appropriate actions, consistent resolution and satisfaction to the complainants.
- Opportunities were identified for further improvement specifically around consistency of terminology and improvements in documentation and procedure, all of which are considered normal given the detailed scrutiny, independence and benchmarking Customer Science has applied.
- Executive Complaints are being treated outside of the City's standard complaint management process and Pathways system. While it is appreciated that this is due to the confidential nature and volume of issues, it is believed to be a more complicated and inferior process and system to ensure that "complaints" are tracked, responded to and adherence to policy and process is validated.

This report sets out detailed findings and the key theme of the recommendations is to build upon the existing very strong framework in place but create clarity, ownership, consistency and discipline to the management of all complaints. No single solution will address this, and all recommendations are co-dependent and interrelated.

Background

As a result of the recommendations of the Department of Local Government, Sport and Cultural Industries Authorised Inquiry into the City of Melville released in June 2019 (Inquiry Report), Customer Science was selected to undertake a review to deliver the following outcomes:

- Independently review the City of Melville's complaints management processes
- Review decision resolution for complaints from 27 June for a period of three months in accordance with recommendation two (2) of the Inquiry Report.

The agreed scope of the review was:

- Review all the Relevant Documents as shown below in order to understand the current documented processes that are in place and verify that the practice of handling complaints and achieving resolution thereof at all levels of the organisation, is in accordance with those documented processes.
- Review complaint resolution, decisions and actions and associated applied processes for complaints received for a period of three months from 27 June, noting any opportunities for process improvement.
- Recommend improvements to current processes and documentation.
- The internal review process includes a conformity scan covering health and safety, environmental, regulatory, legal and other policies, as per recommendation from CSIA report.
- Preparation of a report to summarize the work conducted, including the methodology applied to the review conducted and offer further recommendations that help ensure the findings and recommendations of the Inquiry Report are addressed and will further support the City's goal of working together with its residents to achieve community wellbeing and achieve customer satisfaction.

The following documents were provided as part of the scoping phase:

1. CP-101 Complaints Management Policy
2. CP-107 Managing Unreasonable Conduct by Customers
3. OP- 022 Customer Feedback Policy
4. Customer Feedback Complaints Procedure
5. CSIA Complaints Handling Framework (CHF) Assessment report completed in March 2019
6. Department of Local Government, Sport and Culture Report of the Inquiry into the City of Melville dated June 2019

Review Process

Customer Science reviewed all provided documents and undertook an onsite assessment including interviews, observations and viewing of systems and documentation.

The review process included:

- 12 interviews with City of Melville leaders including the CEO
- 8 hours of side by side observation of service staff in customer contact (phone, email, chat, front counter) and systems use
- Detailed review of 8 policy & procedure documents relating to complaints
- Detailed review of 124 Pathways complaints
- Detailed review of 561 documents in ECM

Following an initial assessment, it was agreed that the original approach of the review be altered based on the volume and access to all complaints requiring assessment, specifically those documents in ECM. It was also agreed that rather than completing a report prior to the in-depth analysis of all complaints, that an initial review be completed, followed by the in-depth review of all ECM documents and then follow with a detailed report.

The initial review was completed on 19 December and provided to the City of Melville. For the purpose of the review, the initial report and this final report, correspondence/complaints that have been directed to the CEO and Council, placed onto ECM and were subject to findings of the Audit Report, will be referred to as **Executive Complaints**. This term is common in complaint management procedures of benchmark organisations and identifies those complaints which are often managed separately and/or receive special handling.

This report, therefore, forms the basis of the detailed review specifically:

- Findings & observations on the complaints documentation
- Detailed review of Pathways complaints
- Detailed review of Executive Complaints
- Recommendations for improvement

Framework

The Initial Review and the Detailed Review are structured into three categories to assist with the assessment and also to clearly identify the findings and recommendations. The table below illustrates at a high level our approach and activities under each step.

	Complaints Documentation & Processes	Pathways Complaints	Executive Complaints
Initial Review	<ul style="list-style-type: none"> Detailed review of all documents Report on findings & observations Report on recommendations 	<ul style="list-style-type: none"> Detailed review all complaints for the 3-month review period Assessment of reasonable outcomes Report on findings Report on recommendations 	<ul style="list-style-type: none"> Understand the special handling process Understand the volume and complexity of Executive Complaints for the 3-month review period Map process and time to review
Detailed Review	<ul style="list-style-type: none"> Final report on findings and recommendations 	<ul style="list-style-type: none"> Final report on findings and recommendations 	<ul style="list-style-type: none"> Detailed review of complaints & findings Develop detailed recommendations Final report on findings and recommendations

Analysis & Findings

As context to the recommendations that will be provided, the following key findings were identified:

Complaints Documentation and Processes

Definition of Complaint, Feedback & Service Request

- The Customer Feedback Policy, Complaints Policy and other documents use the words 'feedback' and 'complaint' interchangeably which makes these documents unclear. This also flows onto the City's website where a resident selects to log a complaint but ends up with a Customer Feedback form.
- Given the importance of these policies and their application, clearer definitions and greater precision in their use is required.
- When a complaint is received via the telephone or in person and resolved immediately, the complaint is not always logged. This means that the city is not capturing the exact number of complaints that are received from its residents, the nature of those complaints and their resolution. This will in turn hinder the identification of root cause and continual improvement initiatives.

Complaints Management Policy

The Complaints Management Policy is of high quality and has been certified by the Customer Service Institute of Australia (March 2019). There were however a number of further opportunities identified:

- While a definition of “complaint” is in place and represents a broad view of compliant to incorporate feedback, given the nature of the Audit Report & the complaints received by the City, this definition needs to be updated and a clearer definition with no ambiguity.
- The Policy does not clearly outline the steps that will be taken to investigate and resolve a complaint. Where the customer is provided with a copy of the Policy and no other supporting documentation, they would not have a clear understanding of what happens next.
- Currently the owner of the complaints policy and process resides in one of the Directorates and should be elevated to the CEO.

Customer Feedback Policy

The Customer Feedback Policy is of high quality and the City is commended for having such policies in place. There were however a number of further opportunities identified:

- The policy refers to identifying problems or strengths with service provision and improvement but should be broader to incorporate identifying problems or strengths about people and contractors.
- A definition of a complaint sits within the Customer Feedback Policy and potentially creates confusion. For consistency and ease it is best to make reference to the Complaints Policy rather than restating in the Customer Feedback Policy. In this way any changes do not have to be made and removes any possible discrepancies.

Customer Feedback Complaints Procedure

The Customer Feedback Complaints Procedure is of high quality and the City is commended for having such documents in place. There were however a number of further opportunities identified:

- The naming of this procedure creates ambiguity in its purpose.
- Scope of the document refers to staff and representatives which is different from the wording in the policy which outlines ‘elected members, staff and contractors’ and there should be alignment and consistency.
- Complaints about elected members are not covered under the scope and needs to be clarified. If they are not covered, then there needs to be an alternative policy and procedures created for the handling of such complaints. If they are covered it needs to clearly be identified in the procedure.
- The sentence “Achieving resolution in any complaints received to further improve the City of Melville’s product and customer services” is unclear and should be clarified to remove any ambiguity.

- The sentences “Auditing the customer feedback process” and ‘Reviewing the effectiveness of the customer feedback process’ should both be removed from this procedure document and they relate to Customer Feedback.
- The process flows and procedures do not adequately outline a validation step for complaints as they come in. There are questions that should be answered: Does this complaint already exist in the system? Who should the complaint be allocated to? Is that person in the office or on leave? Is the complaint categorised correctly?
- Quality Assurance and root cause analysis are not included as part of this document. These steps are critical to continual improvement and should be referenced even if they are conducted as part of a separate process.
- In the Complaint Handling Process – About a City of Melville Staff Member has a step to ‘Advise customer / complainant of investigation and action taken’ without providing any corresponding guidelines, templates or parameters.
- The terms “CSTO” and “Toolbox” are referenced within the document but no explanation of what they mean. A glossary of terms may assist.
- The procedure refers to residents being able to log a complaint in person to ‘any city of Melville employee’ however at present not all staff are following the same complaints process / procedure.
- Under section 5 Recording and Resolving, reference is made to “All **feedback** received by” which should be removed from this procedure document.
- Emphasis on the recording of all notes and action is not prominent enough across the policy, process or procedure.
- The document does not outline the importance of sharing with the customer the process or the set expectations of the process.
- The document refers to a confidential complaint but does not outline what makes a confidential complaint.
- Under the section Investigation of a Complaint it refers to a ‘Service Recovery Matrix’ however this is not included as part of the document.
- Under Response to a Complaint reference is made to ‘Actioning officer is to identify and implement documents to prevent reoccurrence’. It is unclear what “documents” is referring to.
- Under the section Maintenance and Improvements reference is made to ‘The Customer Relations Coordinator will review customer **feedback** and analyse and implement opportunities for improvement’. Again, reference is made to feedback and should either read **complaints** or be removed.
- Under section 6 Employee Well Being and Safety reference is made to storing information about unreasonable complaints being recorded in a memo field needs to be clarified if this is the correct and most appropriate location.
- Under section 7 Employee Responsibilities reference is again made to customer feedback rather than complaints.
- The Customer Relations Improvement Officer only reviews complaints when they are first logged and again when they are closed. Complaints need to be actively managed throughout their lifecycle and monitored for SLA adherence etc.
- Unless a resident is logging a complaint from the website there is little information provided to the resident on the complaints process – what happens next, timeframes etc.

Managing Unreasonable Conduct by Customers

While it is not unusual for organisations to have a policy in place for the protection and instruction of staff where they are being abused or intimidated, the Managing Unreasonable Conduct by Customers is potentially unnecessary. There were however a number of further opportunities identified:

- The policy appears quite specific in its nature and could benefit from being pitched at a higher level and align with the Customer Charter which is already in place and focussed on the protection of employees.
- The policy statement refers to 'legitimate and important' concerns but does not define what and who determines what is 'legitimate and important'.
- There does not appear to be any procedures developed to assist with the operationalisation of the policy.

Customer Charter

The Customer Charter was reviewed and is a high-quality charter which includes commitments to customers and equally sets out standards of behaviour expected from customers. This charter in effect acts as a policy statement around customer behaviour and may be able to be leveraged in certain circumstances. The Melville Way sets out procedures for staff to operationalise this policy including scripts for staff.

Actions/update since Report of Inquiry

- The Report of Inquiry made no mention to the Complaints Handling Framework assessment by the Customer Service Institute of Australia and the subsequent certification that was presented to the City in March 2019 which attests that the Council's compliant management is at a high standard.
- The Report highlighted a need to brief residents on the content of the Complaints Policy when they record a complaint, so expectations are set up front. Process and procedure documents need to be updated to reflect this.
- The report referenced that delays in correspondence with residents due to waiting on legal advice. There should be an initial step within the process to include an initial correspondence to residents with their Complaint ref number in all circumstances and to clearly set expectations up front and throughout the complaints process.
- The Report recommends a more robust complaints handling policy and escalation processes both within the City and externally. This review incorporates those recommendations.
- The Report recommends Senior staff training on complaint management and unreasonable complainants. Internal training has been provided and further training should be considered.

Pathways & ECM system

The City's workflow management system "Pathways" is the key system of record for customer data, service requests and complaints, provides tracking, notes and reporting. An additional system, "ECM", is used as the document storage system and does not provide workflow and tracking at the same standard as Pathways and only allows for limited notes and reporting.

- Pathways is an adequate and appropriate system for logging, recording, tracking and reporting for complaints.
- ECM appears adequate as a secure document storage system but is not effective as a logging, recording, tracking and reporting system for complaints.
- The naming of documents in ECM is inconsistent, meaning that documents associated with a complaint are not always flagged accordingly making them difficult to track.
- This is especially the case with any complaints that are not logged in Pathways and the documents just stored in ECM.
- Executive Complaints, directly to the CEO and Council, are not all tracked in Pathways but are placed in ECM with the intention that they are treated confidentially.
- Documents associated with an Executive Complaint are placed directly in ECM but are not always linked to each other making it difficult to follow the trail of communication or associated actions for any one complaint.
- The auditing of complaints to monitor compliance against both policy and procedure is clear and easy within Pathways however incredibly limited and time consuming within ECM.
- Pathways should be the single and only source of truth for all complaints.

Reporting

Complaint Reporting is adequate for Pathways complaints and inadequate for ECM/Executive Complaints.

- Newly created quarterly Pathways complaint reporting is in place showing volume of complaints, directorate and primary reason and would benefit from being expanded to include root cause analysis, lessons learnt and continual improvement opportunities.
- There are currently categories of complaint cause in Pathways; People, Process and Systems which is enough for high level reporting. However, there would be benefit in rescoping the subcategories to drill down more into the root cause of the complaints.
- Management reporting is accurately extracted from Pathways and presented through Excel & PowerPoint. There is an opportunity for this process to be streamlined with the use of macros and extraction tools, saving time and potential errors.

Follow up & action planning

The intention of the Complaint Management framework is to collate all information related to complaints and analyse data for common issues, root cause and develop improvement plans to improve service and reduce complaints. However, improvement initiatives are managed by each different directorate and there is no centralised improvement register to track ownership, actions, commitments and progress.

Mental Health issues/Report of suicide

It has been observed that there are residents within the City who declare that they have mental health issues throughout the complaints process. In one instance a resident declared that she was suicidal. This is not uncommon across government departments, councils and service providers and is unfortunately increasing. The City has a duty of care to both residents and staff and it does not appear there is adequate coverage of action or escalation in the existing policies to address this.

Escalation process

It is common within complaints policies and procedures to document an escalation trigger and process to address complainants concerns that issues have not been adequately addressed. There does not appear adequate coverage of action or escalation in the existing policies to address this.

Treatment of staff and “elected member” complaints

Currently complaints related to “staff” and “elected member” are recorded through Pathways but are segregated for tracking, auditing and reporting purposes. While it is acknowledged that these complaints can be seen as confidential it is normal procedure that these complaints are managed as part of the normal process and procedure ensuring that right level of tracking, reporting and improvement. It is also observed that these complaints are, at times, only recorded in ECM.

Roles and responsibilities

There are high levels of experience, capability and professionalism evident with the Customer Relations Improvement Officer and the Coordinator Customer Relations which could be leveraged further. Opportunities identified:

- Currently the Customer Relations Improvement Officer only has access to Pathways:
 - COMP03 – Complaints about a Melville Service
 - COMP06 – Complaints about a Non-City of Melville Service
 - COMP01 - Complaint about a Staff Member
- Currently not all complaints are being overseen by the Customer Relations Improvement Officer and the following was noted:
 - complaints being routed to the wrong manager resulting in delays
 - duplicate complaints being recorded
 - complaints classified incorrectly
 - urgent complaints are not flagged for immediate attention
- To ensure consistency in the way complaints are handled, the Customer Relations Improvement Officer should be granted access to all complaints regardless of type.
- The current process does not clearly define all the roles and responsibilities for all staff involved in managing a complaint.

Independence of training

It is noted that training has been provided by the Customer Relations Improvement Officer and it certainly appears to be making a difference to the way in which complaints are managed. Managers have acknowledged the quality and benefits of the training. For Senior Managers however they may benefit from additional complaints leadership training which are commonly provided by external providers.

Pathways Complaints

A review was undertaken of complaints registered in Pathways for the period set by the Audit report being 3 months from 27 June 2019. The following observations were made:

Volume & trending

- 124 complaints were registered, averaging 39 per month over the three-month period.

Types of complaints

- 103 (83%) of complaints were about a service.
- 76 (61%) of complaints are in relation to Technical services with 53 (70%) of those were regarding Resource Recovery & Waste.
- 78 (66%) of complaint causes were Process related.
- Of the 124 complaints, the categories with 10 or more complaints were:
 - 17% related to parking.
 - 13% related to bins.
 - 12% related to perceived poor staff conduct.
 - 8% related to negligence.

Service Level adherence

- Of the 124 complaints recorded, 3 remain open.
- 80% of complaints were resolved within the 10-day SLA.
- 36% of customers were satisfied with the resolution.
- 47% unknown if the customer was satisfied.
- Assessed that 86% of complaints could have been avoided.

Compliance to documented policy/procedure

- 80% of complaints logged (100/124) were compliant with the complaints policy.
- Of the 20% that were not, delays in response to the customer and lack of notes were the primary reasons

Adequacy of complaint resolution/decisions and actions

The majority of Pathway complaints were managed well with both prompt action taken and within the complaints framework.

- 45% of complaints were resolved with an explanation from the council.
- 26% were resolved with an apology and having the corrective action applied.
- A basic audit process is in place for reviewing complaints once they are closed however this audit could be more detailed.
- Currently, customer satisfaction at the conclusion of a complaint is only achieved by asking the resident if they are satisfied. This is only carried out if the resident is contacted by telephone. In many cases it is unknown whether the customer is satisfied or ready for their complaint to be closed.
- Quality of notes was the primary reason for non-conformance of the complaint policy / procedure. In these instances, City staff are not ensuring that detailed notes are recorded at each step of the complaint or that any associated documentation is attached / recorded.
- At times, there is a tendency to quote 'technical' terms to residents on why something cannot / needs to be done.
- The spelling in both the notes of the Pathway cases and the correspondence that goes out to customers can at times be poor.
- A few complaints are raised about the conduct / behaviour of the City of Melville contractors.
- The highest number of complaints received by the city have a root cause of Process / Communication. It is felt that many of these complaints could have been avoided had the engagement with the residents impacted by these changes been improved.
- When complaints are referred to a third party, the complaint is closed out within Pathways however there is no follow up to ensure that the third party closes out the complaint with the resident.
- There were minimal complaints about the IVR however those that did come through complained of lengthy wait times.

Executive Complaints

A review was undertaken of Executive Complaints in ECM for the period set by the Audit report being 3 months from 27 June 2019. The following observations were made:

- From over 500 "complaint" documents in ECM, 341 have been identified as unique documents
- Not all correspondence to the Council executive are complaints/Executive Complaints but rather requests, copies of documents, comments and feedback
- Executive Complaints, complaints direct to Elected Members and those received by field staff (rec centres, libraries etc) are not all logged in Pathways. Most Executive Complaint documents are stored within ECM only which makes tracking, reporting, auditing difficult.
- In addition, visibility of historical complaints and / or current open complaints is extremely difficult when they are not tracked within a single system. This can result in a duplication of effort / a poor experience for the customer when multiple people are managing the same or different issues for a single customer.
- Executive Complaints are largely managed outside of the Complaints Policy and the Pathway system.

- Due to the lack of notes within the ECM system and the lack of structure around the organisation of the documents, it is difficult to determine if in fact there are complaints and if they had been resolved. Certainly, it was observed that actions and correspondence from the City was occurring, but the tracking and auditability of the system is poor.
- Documents stored in ECM are given a document ID and an internal ID reference. Where documents were part of an ongoing issue, the internal ID in many instances did not reference the original case meaning that it is very difficult to easily identify what documents are linked and form part of the same complaint / request.
- A large number of the documents stored within ECM do not have notes against them, or even where there are notes, it cannot be determined what the outcomes were or if the matter had been resolved.
- The naming convention of documents within ECM is highly inconsistent which makes searching for 'Complaints' and achieving accurate data challenging.
- 90 of the documents reviewed in the three-month period were forwarded documents from elected members and City staff, some of which were in relation to matters that were 5+ years old.
- It was observed that there are several historical complaints within ECM that have been ongoing for several years.
- Ongoing noise complaints from one resident were being recorded every few days. Each time these complaints were raised as a new Pathway case and a new set of records were created in ECM with each case being treated as a separate matter.
- It was identified that there were a number of duplicated documents within ECM where different people had forwarded the same document into the system, but a different ID was used creating duplication and confusion.
- Only 40 of the 341 documents identified in ECM had an associated Pathway Case. 45% of those were related to noise disturbance and 25% were complaints about a City of Melville service.

Scope of Executive Complaints

The precise nature of Executive Complaints is not easily determined as they not tracked through the Pathways system. There were 341 unique documents in ECM that were reviewed to determine the exact nature of Executive Complaints.

It was determined that during the 3-month review period there were **47 "new"** Executive Complaints.

Document Types

The detailed review identified and categorised the 341 documents as:

Complaint	213	63%
Request	90	26%
Information	32	9%
Feedback	6	2%

Residents	195	57%
Resident Association	99	29%
Third Party	28	8%
Elected Member /Internal	19	6%

Volume & Trending

- 165 documents (48%) of the 341 documents entered into ECM during the review window, were entered in July 2019.
- 55% of the documents entered in July 2019 were forwarded emails from elected members and City staff containing historical correspondence from residents over a number of years.
- 95 documents were entered in August 2019 and reduced to 70 in September 2019.
- 47% of the documents from the review period were inbound correspondence from residents, residents' associations and third parties.
- 53% of the documents from the review period were outbound or internal correspondence from the City / Elected Members.

Volume of Executive Complaints

- 213 (63%) of all ECM documents were identified as being in relation to a complaint, as per the City's current definition of a complaint.
- 47 (22%) of the Complaint documents were identified as a 'New' complaint
- 94 (44%) of the Complaint documents were 'Historical' (for the purpose of this review, historical related to complaints that were raised prior to the review period. In some instances, many years prior.
- 70 (33%) of the Complaint documents were identified as 'Existing'. These documents related to a complaint that had already been raised during the review period. Typically, they were correspondence between the City and the Resident as they worked through a complaint.

Understanding of the special handling process

The specific handling procedure of Executive Complaints is not easily determined as they not tracked through the Pathways system, workflow and notes. Consequently, we are unable to endorse the existing special handling process for Executive Complaints.

- 254 (74%) of the documents in ECM for the review period had no notes.
- 154 of the documents were linked to either a Pathway Case or another document in ECM. It was noted that many additional documents were linked to others, but the internal ID reference had not been updated to reflect this.

Service Level adherence

Due to the lack of notes, tracking and reporting in ECM it is not possible to determine the achievement to SLA's of the 47 new Executive Complaints. Additionally, due to the complexity, volume and duplicative nature of material presented by the complainants it would be extremely difficult to address within the 10-day window. Based on the detailed review observations, most items are managed outside of the 10-day SLA. There is a greater likelihood to ensure adherence to the SLA should all Executive Complaints be managed through the Pathways system.

Compliance to documented policy/procedure

Due to the lack of notes, tracking and reporting in ECM it is not possible to determine, at high confidence level, that there is compliance with the documented policy & procedure. Issues are recorded and retained, issues investigated, and responses provided. Additionally, due to the complexity, volume and duplicative and repetitive nature of material presented by the complainants it is extremely difficult to decipher and address the issues. There is a greater likelihood to ensure compliance to policy and procedure should all Executive Complaints be managed through the Pathways system.

Adequacy of complaint resolution, decisions and actions

Due to the lack of notes, tracking and reporting in ECM it is not possible to determine, at high confidence level, the adequacy of resolution, decision and actions. Information is provided and actions are taken however there is a lack of clarity as to an exact resolution or outcome. This is particularly the case when information/answers are provided which the complainant does not agree with or accept.

While issue “resolution” would ideally seek to achieve “complainant satisfaction” it is not uncommon in complaint management and industry generally that the parties do not agree on the outcome. It is therefore critical that the policy and procedure is clear on escalation steps, clear on when complaints can be “closed” and procedures in place to include where “no further action” can or will be taken. It is also critical that this procedure and communication is transparent to the complainant.

Recommendations Summary

Aligned to the framework, high level recommendations are in the table below. Particular emphasis will be placed on the Priority opportunities.

Improvement Opportunities	Priority	Future State
Complaints Documentation & Processes	<ol style="list-style-type: none"> 1. Clarify and consistently align the definition of a complaint 2. Update the Complaints Policy, Customer Feedback Policy and Complaints Procedure <i>(as outlined in the detailed recommendations)</i> 3. Establish customer facing supporting documentation, escalation matrix / website / guidelines 4. Extend system access & delegated authorities for staff dealing with complaints 5. Undertake external Executive Complaint Handling Training and City-wide briefing, including contractors, on the changes 	<ol style="list-style-type: none"> 1. Review and update process for conducting root cause analysis and driving continual improvement 2. Expand the scope of Complaints reporting to increase visibility, awareness and action 3. Establish guidelines in relation to duty of care in mental health 4. Review Managing Unreasonable Behavior Policy
Pathways Complaints	<ol style="list-style-type: none"> 6. Log all complaints, even those resolved over the phone and counter service 7. Implement an extended audit process on an ongoing basis 	<ol style="list-style-type: none"> 5. Investigate automated SLA tracking and reporting 6. Review Customer Survey options for email complaints
Executive Complaints	<ol style="list-style-type: none"> 8. Commence recording 'Executive Complaints', defined by the Complaints Policy, in Pathways 9. Manage all 'Executive Complaints' as per the standard Complaints Policy & Complaints Procedure 10. Review and develop an escalation and "No Further Action" sections in the Complaints Policy & Procedure. 	<ol style="list-style-type: none"> 7. Review the benefit to creating Pathway records for historical and existing Executive Complaints

N.B. Recommendations in bold represent quick wins

Recommendations - Priority

The key theme of the Priority recommendations is to build upon the existing very strong framework in place but create clarity, ownership, consistency and discipline to the management of all complaints. No single solution will address this, and all recommendations are co-dependent and interrelated.

Complaints Documentation and Process Opportunities

1. The City's **definition of "complaint"** needs to be reviewed and updated to ensure that City staff and residents are clear on the difference between a customer service request, customer feedback and a complaint and what constitutes a complaint. While some organisations take a "broad view" on the definition of complaint to capture and document customer insights, The City of Melville would benefit from a clearer, more defined view specifically as the processes and procedures for each is quite precise. It is felt that a clearer definition would greatly assist staff and residents.
2. **The Complaints Policy, Customer Feedback Policy and the Complaints Procedure should be revised** and clearly separated from each other. The detailed recommended changes in each document are contained in Appendix A. The changes would therefore incorporate and align on the definitions and ensure each document is fit for its purpose. This clarity and specificity will assist with reporting and ensuring appropriate actions.
3. Provide a **customer facing and staff guide** to complaints which outlines the Complaints framework including steps taken to resolve, escalate and close a complaint with appropriate templates. This document can also outline key milestones so that the resident's expectations are set from the outset.
4. Extend **system access & delegated authorities** for staff dealing with complaints, specifically the Customer Relations Improvement Officer. This would include access to:
 - COMP02 - Complaint about an Elected Member
 - COMP07 - Complaint about a Contractor
 - COMP09 - Complaint about a Supplier
 - Executive Complaints

This access would allow monitoring, auditing (quality assurance and adherence to policy) and reporting of complaints. Also, it would provide a holistic view of complaints and necessary improvement initiatives.

5. It is strongly recommended that tailored external **executive/leadership Complaints Handling & Customer Service Training** such as through the Customer Service Institute of Australia (CSIA), be considered. This independent leadership training will provide further skills and insights into complaint management, demonstrating the City's ongoing commitment to complaints. It is also recommended that all staff, including contractors, undergo some dedicated briefing on the final recommendations and changes to ensure they are operationalized effectively.

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Pathway Complaints Opportunities

6. **Log all complaints** even those that are resolved on the phone and in person into Pathways for accurate tracking, reporting and insight purposes.
7. Establish a comprehensive **audit process** for all complaints on an ongoing basis.
 - what is the appropriate close out for a complaint? If the resident has been emailed to answer a complaint, consider that the resident be contacted within 5 days of that email being sent to confirm that their complaint has been resolved?
 - where customer satisfaction has not been able to be determined, consider a customer satisfaction survey that can be emailed to the resident.

Executive Complaints Opportunities

8. Commence **recording all 'Executive Complaints', as defined by the Complaints Policy, in Pathways** rather than ECM, and that Pathways is relied upon as the single source of truth for complaints providing a single and reliable system for tracking, reporting and audit purposes. It will need to be validated that documents loaded through Pathways are stored automatically through to ECM. In other words, ECM is used only for storage not for workflow nor management of Executive Complaints.
9. **Manage all 'Executive Complaints' as per the standard Complaints Policy & Complaints Procedure**
10. The Complaints Policy and Procedures be updated to include **definitions and actions for escalation** when a matter is deemed as **resolved or closed** (including but not restricted to an Ombudsman or State Body decision/ruling) and that there is a fair and reasonable **'no further action'** policy and procedure included.

Recommendations – Future State

The following recommendations relate to longer term initiatives to deliver improved complaints handling and management but would require the delivery and stabilisation of the priority items before embarking on further initiatives.

1. Quality Assurance and root cause analysis is critical to developing a mature complaints framework, providing resolution to issues and preventing them reoccur. Creation of a centralised Continual Improvement register for all improvement activities that are generated from complaints with clear ownership and timeframes.
2. Establish a regular meeting with all Directorate leads with a formalised agenda to cover:
 - Summary of complaints for the period
 - Exceptions in the data
 - Root cause findings
 - Lessons Learnt
 - Improvement opportunities
3. It is recommended to have a process in place on how to support residents and staff, where to get support, how to organise and what actions are to be taken in the case of mental health issues.
4. It is recommended that the Managing Unreasonable Behaviour Policy be reviewed, and consideration given to a 'Code of Conduct' Policy / Framework for residents or leverage the existing Customer Charter on how to manage unreasonable behaviour with all escalation options defined.
5. Investigate automated SLA tracking and reporting.
6. Review Customer Survey options for email complaints.
7. Review the benefit to creating Pathway records for historical and existing Executive Complaints.

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Next Steps & Actions

Customer Science recommends the next steps and actions as follows:

1	Present Final Report to Executive	Customer Science	10 Jan
2	Workshop report findings and recommendations with Executive	Sponsor & Customer Science	By 17 Jan
3	Final Report and Recommendations	Customer Science	20 Jan
4	Commence embedding recommendations (as required)	Customer Science	20 Jan
5	Follow up & review progress	Customer Science	30 Mar

Customer Science also recommends that the available time and resources allocated to this review be leveraged to complete the following actions, naturally should they be endorsed by the City:

1. **Clarify and consistently align the definition of a complaint**
2. **Update the Complaints Policy, Customer Feedback Policy and Complaints Procedure**
10. **Review and development of escalation and a “No Further Action” section in the Complaints Policy & Procedure.**

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Appendix A: Detailed recommendations & considerations

Complaints Documentation and Process Opportunities

1. The Customer Feedback Policy and Complaints Policy should be revised and clearly separated from each other. The website should also be updated so it is clear for a resident that there is a difference between feedback, compliments and logging a complaint. [Priority Recommendation 1]

Complaints policy

2. The City's definition of complaint needs to be reviewed and updated to ensure that City staff and resident are clear on the difference between customer feedback and a complaint and what constitutes a complaint. [Priority Recommendation 1]
3. Provide a customer facing and staff guide to complaints which outlines the Complaints framework including steps taken to resolve. This document can also outline key milestones so that the resident's expectations are set from the outset. [Priority Recommendation 3]

Customer Feedback Policy

4. Update the policy to reflect that people and contractors could be a problem area / receive a compliment etc. This includes updating the list of areas a customer could provide feedback on to include Contractors. [Priority Recommendation 2]
5. It is recommended that the Definition of a Complaint and the associated Policy Statement are removed from the feedback policy [Priority Recommendation 2]
6. Item 7 'Investigation of Complaints' should be removed from this policy and only be in the Complaints policy [Priority Recommendation 2]

Complaints procedure

7. Provide templates for staff to use to gather all relevant information for complaint [Priority Recommendation 3]
8. Align wording from Complaints Policy and replace "staff and representatives" with "elected members, staff and contractors" [Priority Recommendation 2]
9. It is recommended that all Complaints regardless of the nature follow the same complaints policy and procedures but may have a slightly different handling process as per 'executive complaints. [Priority Recommendation 2]
10. Consider a revision to this 'Achieving resolution in any complaints received to further improve the City of Melville's product and customer services' sentence as it is not clear. Suggest separating out why the City wants to achieve a resolution and the benefits of this. [Priority Recommendation 2]
11. Both line items should be removed 'Auditing the customer feedback process' and 'Reviewing the effectiveness of the customer feedback process' from this document as they are in relation to Customer Feedback. [Priority Recommendation 2]

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12. Both process / procedures are rewritten to clearly define everyone's responsibilities when managing a complaint and the steps needing to be taken in more detail. A RACI outline each role and each step would assist with this. [Priority Recommendation 2]
13. Quality Assurance / root cause analysis are not included as part of the process / procedures. These items should be included as next step even if they are not covered as part of this process. [Priority Recommendation 2]
14. Guidelines should be put into place around the confidential nature of certain actions that should not be shared with the resident e.g. About a City of Melville Staff Member has a step to 'Advise customer / complainant of investigation and action taken'. [Priority Recommendation 2]
15. Ensure that a glossary of terms included. [Priority Recommendation 2]
16. Alignment across the whole of the City of Melville, using a single complaints framework and system is required. [Priority Recommendation 5]
17. The document is in relation to complaints and should be updated to not keep referring to the term 'feedback'. [Priority Recommendation 2]
18. Update the documents to ensure that record keeping is a key success factor and a non-conformance if not complied with. [Priority Recommendation 2]
19. Procedure be updated to include expectation customer setting as a step in the process. [Priority Recommendation 2]
20. Ensure that the document gives a clear explanation on what constitutes a 'confidential complaint'. [Priority Recommendation 2]
21. Update the procedure to include the Service Recovery Matrix or refer to where this can be located [Priority Recommendation 2]
22. Update the procedure to be clear what documents are being referred to, 'Actioning officer is to identify and implement documents to prevent reoccurrence'. [Priority Recommendation 2]
23. Update the document under Maintenance and Improvements to replace the word feedback with "complaints". Provide steps of analysis to be carried out or refer to a separate process. Also, at present auditing is restricted only to complaints about a service so either the process needs to be updated or as recommended allow the coordinator access to all complaints. [Priority Recommendation 2]
24. Review Employee Well Being and Safety reference to storing information about unreasonable complaints and these being recorded in a memo field. [Priority Recommendation 2]
25. Update Employee Responsibilities to amend the reference to customer feedback. [Priority Recommendation 2]
26. Include a RACI for the Complaints process, so all staff are clear on their roles and responsibilities. [Priority Recommendation 2]
27. Investigate opportunity in Pathway to build in SLA's / SLA breach warnings-to enable a more effective manner of overseeing and tracking complaints. Alternatively, this could be achieved through daily reporting on the number of days complaints have been open.

Managing Unreasonable Conduct by Customers

28. That this policy has a full review and rewrite. Fully leverage the existing Customer Charter or consider a 'Code of Conduct' Policy / Framework for residents and then a separate internal document on how to manage unreasonable behaviour with all escalation options defined. [Future Recommendation 4]

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29. Guidelines on what constitutes a complaint with some examples could assist residents.
[Priority Recommendation 3]

Reporting

30. Include root cause analysis, lessons learnt and continual improvement opportunities in complaint reporting. [Future recommendation 1]
31. Establish a regular meeting with all Directorate leads with a formalised agenda to cover:
- Summary of complaints for the period
 - Exceptions in the data
 - Root cause findings
 - Lessons Learnt
 - Improvement opportunities

[Future recommendation 2]

Review complaint types and categories for analysis with potentially more subcategories [Future recommendation 2]

Consider a reporting hierarchy and the appropriate audiences to increase visibility and awareness of complaints for the City, Elected Members and the Residents.
[Future recommendation 2]

Communication/access

Ensure that all residents are properly informed at the time of logging a complaint, including a complaint reference number and a timeframe. Suggest a 'what happens next?' image / document to be provided. [Priority recommendation 3]

Resources and capability

32. To ensure consistency in the way complaints are handled, the Customer Relations Improvement Officer should be granted access to all complaints regardless of type. This would include:
- COMP01 - Complaint about a Staff Member
 - COMP02 - Complaint about an Elected Member
 - COMP07 - Complaint about a Contractor
 - COMP09 - Complaint about a Supplier
 - Executive Complaints

This access would allow monitoring, auditing (quality assurance and adherence to policy) and reporting of complaints. Also, it would provide a holistic view of complaints and necessary improvement initiatives. [Priority recommendation 4]

33. A level of authority needs to be provided to the Customer Relations Improvement Officer role to enforce compliance to the complaints policy and associated process / procedures.
[Priority recommendation 4]
34. Update the procedure so that the Customer Relations Improvement Officer conducts validation for all incoming complaints. In addition, a process for reclassifying a complaint

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or complaint type should be in place with only limited staff that can carry out this action.
[Priority recommendation 4]

Follow up and action planning

35. Creation of a centralised Continual Improvement register for all improvement activities that are generated from complaints with clear ownership and timeframes. Monthly reporting. [Future recommendation 1]

Pathways and ECM system

36. ECM ceases to be used as a separate complaints system and all complaints are recorded and tracked through Pathways. [Priority recommendation 8]
37. A strict naming convention needs to be agreed and then made mandatory when storing documents in ECM. [Priority recommendation 8]

Mental Health issues/Report of suicide

38. It is recommended to have a process in place on how to support residents and staff, where to get support (agency?), how to organise, what actions are to be taken. [Future recommendation 3]
39. Coaching should be provided for staff on mental health awareness. [Future recommendation 3]
40. Investigate necessary options on providing residents with additional care. [Future recommendation 3]

Complaints Training

41. There may be benefit in some external Complaints Handling & Customer Service Training to further enforce not only why this is important but to help give staff the tools and support they need to feel comfortable in managing complaints. For the leaders, Service Leadership training should also be a consideration to align the leadership team and re-enforce the importance of leading by example. It is highly recommended that consideration being given for dedicated, independent and external Leadership Complaints training such as through the Customer Service Institute of Australia (CSIA) offering proven & certified training. [Priority recommendation 5]
42. It is recommended that ALL Contractors have mandatory induction training which includes the Melville Way to set expectations on how they must conduct themselves whilst they are representing the City. This should include follow up training refreshers at regular intervals. [Priority recommendation 5]

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Pathway Complaints Opportunities

43. Establish the use of local council language / acts and legislation in communications with residents. It needs to be used in a manner that is understandable to the resident. [Priority recommendation 3]
44. Investigate whether or not a spell check feature is available in Pathway
45. For Community impacting changes, review the Community Consultation / Communication process to ensure that all aspects are being covered dependant on the size and scope of the change. [Priority recommendation 3]
46. Review the complaints process and consider a follow up step within one week of the transfer to a 3rd party to ensure issue resolved. [Priority recommendation 2]
47. Consideration should be given to the IVR and what happens where there are long waits for residents.
48. Establish a comprehensive audit process for all complaints would be beneficial.
 - what is the appropriate close out for a complaint? If the resident has been emailed to answer a complaint, consider that the resident be contacted within 5 days of that email being sent to confirm that their complaint has been resolved?
 - where customer satisfaction has not been able to be determined, consider a customer satisfaction survey that can be emailed to the resident.

[Priority recommendation 4]
49. Log ALL complaints even those that are resolved on the phone / in person. [Priority recommendation 2]

Executive Complaints Opportunities

50. As not all correspondence to the Council executive is a Complaint/Executive Complaint in terms of the Complaints Policy, it is recommended that a triage of executive correspondence be undertaken on all executive correspondence as it arrives to ensure correct allocation of a complaint to then follow the complaints procedure. [Priority recommendation 9]
51. As Executive Complaints are identified and entered into Pathways, they need follow and adhere to the Complaints Policy in the same way as any other complaint however it is recommended that 'Executive Complaints' are handled by nominated individuals within the City. [Priority recommendation 9]
52. Where correspondence/feedback/requests are received by Elected Members or the City, but they are not actually 'Complaints, they should still be logged in a single feedback system for tracking, reporting and auditing purposes. [Priority recommendation 9]
53. Establish an appropriate **governance for document management** in ECM, to ensure document control, standardised naming conventions and document linkage. [Priority recommendation 8]

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