



Review of Complaints Handling –
Airservices Australia
February 2011

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I. Executive summary

The Aircraft Noise Ombudsman (ANO) would like to acknowledge the considerable support provided by Airservices, particularly those in the Noise Enquiry Unit (NEU), and those responsible for the NEU, in the preparation of this review.

This review assesses the performance of Airservices Australia (Airservices) in the handling and management of noise complaints by using the Commonwealth Ombudsman's *Better Practice Guide to Complaint Handling* as a benchmark.

Significantly, the ANO found that Airservices has established a comprehensive Noise Enquiry Unit (NEU) resourced by highly capable and committed staff. The unit is supported by systems and processes which meet the current objectives of the NEU. Commendably, Airservices has established a diverse range of accessibility methods for the public to register noise complaints, including WebTrak¹, an example of world best practice in delivering dynamic information regarding aircraft operations around major Australian airports.

Through analysis of complaint data, consideration of unsolicited public submissions to the ANO, and other information inputs, the ANO has been able to identify a number of opportunities to enhance Airservices complaint management processes. Primarily, this review recommends a shift in the organisational emphasis from information provision about aircraft noise, to active investigation and resolution of complaints. A cultural shift from being an enquiry unit (providing information and data) to one of a complaints unit (seeking a suitable remedy for the complainant) which will enable complaint information to feed into improvements to aviation programs and services, and ultimately provide better noise outcomes for the Australian public.

It is important to emphasise that improved complaint handling can improve aircraft noise outcomes. Historically an assumption that has directed the response to noise complaints has been that, because Airservices endeavours to deliver the best possible outcomes on aircraft noise, there will be little that can be done to improve those outcomes in response to complaints. In practice there are both short and long term possibilities for improving outcomes through improved responses. In some cases (albeit not many) a change can be made in the short term, such as where a minor change to procedures can lessen the impact of aircraft noise. In the longer term the use of complaint data to inform planning and implementation of aircraft flight paths and procedures will deliver better outcomes.

Cultural reform requires supporting systems, procedures and tools as well as training and education. Data collection, analysis and information provision will all require enhancement. As such, this review incorporates a total of 18 recommendations (**Attachment 1**) to assist Airservices to enhance the effectiveness of its complaint handling.

Finally, the review has also highlighted a number of issues relating to aircraft noise that cross organisational and agency boundaries. These issues will be pursued separately by the ANO, with the aim of improving aircraft noise management nationally.

¹ WebTrak is an innovative web based system that provides the community dynamic and almost real time information on aircraft operations around major airports

II. Introduction

On 16 December 2009 the Australian government released the Aviation White Paper 'Flight Path to the Future', which proposed the establishment of an Aircraft Noise Ombudsman (ANO) to:

- oversee the handling of aircraft noise enquiries and complaints
- conduct independent reviews of noise complaints handling
- make recommendations for improvements where necessary.

The *Aircraft Noise Ombudsman Charter*² was published in September 2010 followed by the appointment of Mr Ron Brent as the first Aircraft Noise Ombudsman. One of the purposes in establishing the ANO as stated in the charter is to 'review the handling of complaints or enquiries made to Airservices about aircraft noise'. Early correspondence to the ANO has revealed a number of opportunities for improving complaint handling and has provided a significant input into this review, in accordance with the terms of reference included at **Attachment 2**.

In summary, this review is based around the Commonwealth Ombudsman's *Better Practice Guide to Complaint Handling*³ (*Better Practice Guide*).

The *Better Practice Guide* identifies five elements of effective complaint handling: **Culture, Principles, People, Process and Analysis**. This review benchmarks Airservices' handling of noise complaints against these five elements, particularly in relation to the Airservices' Noise Enquiry Unit (NEU). The structure of the review is therefore based on the elements and sub-headings as set out in the *Better Practice Guide*.

III. Review methodology

In conducting this review, the ANO has drawn upon the following sources of information:

- ANO complainant case files
- Observation of, and discussions with, NEU staff in Sydney
- Discussions with staff and management in complaint-related roles within Airservices
- Discussions with aviation stakeholders, including Airport owners and operators, airport community forums and industry noise management specialists
- Airservices' procedures relating to *Aircraft Noise Enquiries and Complaints*.

² Available at <http://www.ano.gov.au/>

³ Available at <http://www.ombudsman.gov.au/>

Sufficient data has been considered to conclude that the issues raised in this review are, at least to some degree, systemic. Adequate sampling has been undertaken to support the findings and recommendations of this review. Nevertheless, over time there will be further information and learning to be gained from continued engagement with complainants and this is likely to result in further suggestions for improvement. These will be provided to Airservices on an ongoing basis in response to particular complaint reviews.

This review did not call for public submissions as there was already a large amount of material available that reflected the views of complainants and other stakeholders. It was not considered appropriate to incur the substantial delay that public consultation would have imposed. It is important in this regard to note that the role of the Aircraft Noise Ombudsman is ongoing, and the reform of aircraft noise complaint handling will continue in response to further engagement with the public and other stakeholders.

Some approaches from the public through the ANO complaints handling system reflect frustration and anger, which can inhibit effective complaint handling. However, in the overwhelming majority of complaints received by the ANO, the tone and nature of the complaints are supportive and constructive, and have provided useful input into how the complainant experience could be enhanced. Furthermore, the open and willing participation of Airservices staff and other aviation stakeholders in their dealings with the ANO has provided valuable insight into the significant complexities that surround aircraft noise issues. These contributions have assisted greatly in developing a constructive set of recommendations.

IV. Airservices Australia's Response to this Review

Airservices has welcomed and strongly supported the review. The organisation has provided access to data and personnel without hesitation. This reflects the strong commitment in Airservices to improve responses to, and management of, noise complaints and to effectively manage those complaints to improve outcomes on aircraft noise.

Many of the recommendations in this review are matters either suggested or supported by staff and management within Airservices. Those most closely involved with complaints are committed to reform and have made an important contribution in shaping this review.

1 Culture

The *Better Practice Guide* states that an agency that cares about their clients and reputation will be committed to best practice complaint handling. Ideally, such an agency will have a culture that recognises the value of complaints as well as requiring all staff to be committed to effective complaint resolution. The *Better Practice Guide* sets out four elements of an agency's response to complaints that should be considered, and these are addressed under the four sub-headings below.

1.1 The value of complaints

The culture of an organisation affects how it uses and responds to complaints. The *Better Practice Guide* recommends that agencies should use complaint information to:

1. Provide a suitable remedy to a complainant
2. Maintain good relations with the public and build client loyalty
3. Evaluate and improve programs and services
4. Inform decision making about future service delivery.

The first of these elements is key to the effective and proper handling of complaints. To assess Airservices' complaint culture the review began by looking at the *Aircraft Noise Enquiries and Complaints Procedures* (NEU procedures) that guide the NEU. Included in the NEU procedures is a statement that the NEU 'provides information rather than resolution'. This suggests that the NEU (and indeed Airservices) does not seek to 'provide a suitable remedy to a complainant' as described in point 1 above. A footnote in the NEU procedures does state that 'where the complaint requires some form of resolution this will be conducted at the 3rd or 4th level management' (sic). While the levels of management are not explained in the procedures, the implication is that the issue would be raised by the NEU Team Leader to higher levels within Airservices' organisational structure.

If Airservices assumes that resolution of aircraft noise complaints relies on reducing or eliminating that noise, or relocating it elsewhere, then the overwhelming majority of complaints are not able to be resolved. On the other hand, for those limited cases where the noise can be dealt with, it is important that the procedures acknowledge and accommodate this outcome. An example might be where aircraft are able to fly outside an agreed flight path, and doing so has operational advantages, without compromising safety. However a better noise outcome may be achieved by having the aircraft remain on the prescribed flight path. In such cases the resolution of the complaint may require no more than bringing to the attention of the relevant air traffic controllers the need to apply flight paths more stringently to avoid inadvertent noise consequences.

Recommendation 1: Airservices should amend its systems and procedures to support the NEU seeking a suitable remedy for those complaints where it may be possible to improve the noise outcome, and ensure follow-up on such opportunities. It is acknowledged that an improved noise outcome may only be feasible for a small minority of the total noise complaints received.

Even where the cause of the complaint, the aircraft noise itself, cannot be reduced or eliminated, it still may be possible to provide a suitable remedy to a complainant. The experience in ombudsman offices is that the most common single method of complaint resolution is through the provision of better, clearer and/or more detailed explanations. This method of resolution is most effective where the complaint arises under a complex set of circumstances that are otherwise difficult to explain, a context that often applies to aircraft noise complaints.

Given that the majority of complainants understand that aircraft noise is unavoidable, a common issue is whether a particular flight path is necessary or whether a simple alternative is available. The NEU does conduct a first level investigation of flight paths, where possible, and in these cases provides an explanation to complainants. The WebTrak tool helps facilitate the provision of information to the public and is an excellent enhancement to the noise management system.

Some flight activity that generates public concern has simple explanations, such as emergency medical flights operating during a curfew, aircraft with different ascent rates due to fuel or passenger loads, or flight paths varying according to weather patterns on a particular day. While this may not satisfy the complainant, they may at least accept that the result is noise that cannot be avoided given the need for aircraft to fly.

Some flight activity is more difficult to explain, involving complex technical concepts and a combination of factors that can be difficult for a complainant to understand or accept. Despite this difficulty, it is important that a reasonable explanation is provided to respond to a complainant's concerns. In this regard, the NEU has the opportunity to improve its systems and resources to improve the prospects of resolution for this form of complaint by:

1. Deliberately targeting a better, and more specific, explanation, given the nature of the complaint
2. Enhancing the tools available to the NEU that support the information provided to complainants.

Both of these actions are predicated on the capability and expertise of the staff within, and those supporting, the NEU.

The NEU staff are highly knowledgeable, and possess high level communications skills. Often this leads to an explanation being provided that satisfies the complainant of the need for the noise. Nevertheless the clear statement in the procedures that the NEU is not a resolution service leads to two concerns:

- Failure to recognise as resolved those cases where an explanation has satisfied the complainant. This leads to misleading data about the expectations of complainants, some of whom are seeking simply to understand the issues, while others are seeking change. It may also limit the value of the complaint data in guiding future policy and operational decisions
- The absence of a clear objective to resolve complaints through better explanation may lead to opportunities being missed, such as obtaining information about the complaint that can feed into future air traffic planning and information strategies. In particular less emphasis is placed on the development of material and aids to support the provision of clear and meaningful explanations. This also limits the opportunity for complaints to inform Airservices' communication strategies.

Recommendation 2: Airservices should amend the objectives of the NEU, as stated in the NEU procedures, to include ‘complaint resolution through the provision of more targeted information’. In addition, Airservices should develop and implement systems and tools to assist with this new objective.

The second benefit of a culture that values complaints (maintaining good public relations and client loyalty) has limited application to Airservices when considering the client loyalty component, given the nature of its role and responsibilities. On the other hand, the need to maintain good relations with the community is just as important to Airservices as it is to any other government agency that is required to engage with the public.

Airservices has correctly focussed on safety as the preeminent concern in air traffic management. Historically this has led to aircraft noise being given less attention than it deserves and has meant that the existing complaint systems are focussed on the provision of information. They are therefore limited in their ability to identify opportunities for improving services and stakeholder relationships.

It is a credit to the small NEU team and their immediate team leader that they have remained highly committed to their work despite the limited role they can play. It is also clear that the current management and leadership team in Airservices is strongly committed to a different approach to complaint management, in accordance with best practice. This will achieve better outcomes for complainants and the Australian community, while supporting improvements to aviation management.

Turning to the third and fourth benefits of a complaints valuing culture, Airservices would benefit from the implementation of processes, procedures and tools that allow greater analysis of complaints to evaluate and improve service delivery, as well as to inform policy development. This requires the capacity to identify and act on those complaints that point to a better way to manage aircraft noise. This is addressed specifically in section 1.3 ‘Management Responsibility’, but should also be reflected in the ongoing work of the organisation’s leadership, to embed a culture that views complaints as a core part of Airservices’ work and a significant opportunity to improve its services.

1.2 Commitment

Airservices has made a commitment to provide high quality technical and professional information to those making complaints or enquiries about aircraft noise. The NEU’s responsibilities include the provision of information to complainants, recording and collating data, and ultimately providing feedback on that data within Airservices. This mandate is enunciated in the NEU Procedures.

From the Board and CEO down, Airservices has made a commitment to best practice complaint handling, and has backed this commitment with support to the ANO in both the development of this review and the ANO’s broader role. At the same time, past practices, lack of expertise in some aspects of complaint handling and lack of time and opportunity for reform, have resulted in an approach to complaints handling focused on

information provision and collection of simple statistical data rather than the comprehensive approach recommended by this review.

A clear commitment to resolving complaints, especially those aspects that might lead to improvement in the management of aircraft noise, will assist Airservices to develop as a 'world's best practice' organisation in the management of aircraft noise.

1.3 Management Responsibilities

In reviewing NEU procedures, as well as the duty statements for NEU staff and management, it is unclear where ownership of the opportunities that arise from noise complaints lies. To benefit from these opportunities, in particular to 'evaluate and improve programs and services' and to 'inform decision making about future service delivery', there needs to be managerial ownership to capture, record and track opportunities to improve noise management. Such opportunities should be pursued, wherever possible, with clear accountability for the outcome.

Recommendation 3: Airservices should make a senior manager accountable for capturing, recording and tracking through to implementation, noise improvement opportunities arising from complaints.

1.4 Resources

The *Better Practice Guide* states that a 'complaint handling system must be properly staffed and resourced'. Airservices has spent considerable effort in establishing the NEU, recruiting suitably qualified staff, providing training and designing and developing software systems to meet the current objectives as stated in the NEU procedures.

While the NEU appears to be suitably resourced in human terms to meet the current requirements, the implementation of the recommendations within this review may require additional resources. Staff of the NEU are, at least at peak times, under significant pressure to respond in accordance with the current procedures, noting that this is primarily limited to the 'provision of information and recording of data'. A broader role for the unit, to pursue possible resolution of complaints and record more comprehensive data, may result in a demand for further resources, at least in the short term. In the long term, more effective complaint management may result in a reduction in complaint numbers and workload.

Recommendation 4: Airservices should review the resource requirement for the NEU when implementing the changes recommended in this review.

Further, in terms of culture, there is a subtle but significant aspect of the nomenclature used to identify the group (Noise **Enquiry** Unit as opposed to a **complaints** unit), which can limit the effectiveness and cultural positioning of complaint handling (and historically has done so). This is demonstrated in the case study following.

Case Study 1 – We will explain the noise, but we can't help you

Mrs M from Western Australia has submitted numerous complaints, including requests for changes to flight paths, introduction of a curfew, requests for noise monitoring equipment and attendance at noise forums. In particular, one suggestion she has put is that planes could be spread over a wider flight path so that not all the noise was directly over her house. While the complaint has generated a significant number of responses from Airservices, they are limited to the provision of information, as opposed to identifying any action that could possibly be undertaken to address Mrs M's concerns. None of the responses suggests that the proposal to widen the flight path has been considered, and none explains why this is not possible. While information may be sufficient in response to a noise **enquiry**, it does not satisfy the requirements, or expectations, of those submitting a noise **complaint**. It may not be possible to make any changes at all to improve Mrs M's situation, but it is important to address the suggestions and proposals that Mrs M has put forward to determine whether or not any improvement is possible.

Reference: ANO008

The NEU procedures clearly state that the term 'complaint' refers to complaints as well as enquiries and comments. This therefore seems inconsistent with the naming of the unit as an enquiry unit. The naming of a unit has a significant effect on the culture within the group as well as how its role is perceived by the organisation. If the intent is to transition from provision of advice to resolution, then such a change will be supported by a coincident change in the name of the unit to Noise Complaints Unit or similar and is not inconsistent with the Ministerial Direction that a 'noise enquiry service' be provided.

Recommendation 5: Airservices, in adopting the other recommendations included within this review, should amend the name of the NEU to Noise Complaints Unit (NCU) or similar to reflect the unit's role in resolving complaints.

2 Principles

There are many models for effective complaint handling according to the *Better Practice Guide*, and the choice of model must be suited to the work, structure and size of an organisation. Whatever the model, five fundamental principles must be observed: fairness, accessibility, responsiveness, efficiency and integration. The NEU Procedures explicitly incorporate these five principles.

2.1 Fairness

The staff of the NEU rate as very fair when assessed against the detail in the *Better Practice Guide*. NEU staff are highly skilled, efficient, professional, courteous and patient when dealing with complainants.

At the same time, it could be perceived as unfair for complainants to be denied the answer to the difficult questions they often pose, on the basis that it is not within the current role of the NEU to seek such resolution of complaints. When a complainant asked why a flight path could not be moved from over a residential area in which she lived to the rural area three kilometres to the east, the response given was that the flight paths in the area were decided in response to a complex mix of safety issues, and through a consultation process, so the flight paths would not be changed in the immediate future. This response does not answer the question of why the flight path could not be moved.

A fairer response should address the specific question asked. While the answer may be that such a move would require linked moves of numerous other flight paths and is therefore too expensive and not possible until another major route review is implemented, this should be explained clearly.

2.2 Accessibility

Airservices has established an efficient and accessible noise enquiry service. The internet based 'WebTrak' service is an example of world's best practice in delivering dynamic and almost real time information about aircraft noise, as well as a dynamic opportunity to lodge complaints. At the same time the organisation has ensured that other avenues for complaint remain for those without access to the internet, or for those with a preference for personal interchange. Further, information about flight paths, aircraft movements, noise levels and complaints is widely distributed, for example, through the preparation and distribution of aircraft track plot diagrams, monthly and quarterly reports, property information packs for certain locations, general information on the website, fact sheets for some locations and through the assistance provided by the NEU in relation to WebTrak.

There is always room to improve the accessibility of services, especially with the rapid development of information and communication technologies. Future developments in this area could include a more sophisticated complaints form (along the lines of that now in use by the Commonwealth Ombudsman), enhancements to WebTrak, and additional tools to illustrate the impact of aircraft noise. Enhancement of the current information systems form the focus of a future ANO review on the provision of information relating to aircraft noise.

Given the cost and ongoing nature of improvements in complaints systems, this review has not made specific recommendations in this area. Airservices is already committed to best practice accessibility for noise complaint handling.

2.3 Responsiveness

Analysis of the NEU database reveals a timely response to complainants. Turnaround times are short and generally the NEU has responded to those complainants seeking a formal response in a timely manner. With the current focus being information provision, rather than complaint resolution, the NEU's systems and procedures are not conducive to complaint investigation to a level that ensures responses are always well tailored to the specific questions asked. Similarly, the language and tools used to convey information and provide responses to complainants will be better targeted when the NEU objective is more explicitly focussed on resolving complaints. This is reflected in the discussion above and in the recommendations of this review.

The *Better Practice Guide* also uses the responsiveness heading to deal with the issue of difficult complainant behaviour. This is a subject that occupies an entire better practice guide, issued under the auspices of all the state and Australian Parliamentary Ombudsman offices. There is a significant incidence of difficult complainant behaviours evident in the field of aircraft noise complaints, ranging from undue and unreasonable persistence to inappropriate conduct and threatening behaviours. It is therefore important that the NEU develop clear and explicit strategies for managing such behaviours, including ending correspondence with complainants when there is nothing further that can be achieved by prolonged discussions, terminating calls when complainants become abusive, and referring credible threats of violence to the appropriate authorities. The ANO is well positioned to assist in the development of such strategies if desired.

Recommendation 6: Airservices should review and expand their written procedures and protocols for responding to unreasonable complainant behaviours.

2.4 Efficiency

The efficiency of the NEU is to some degree hampered by the software and database tools available and the inability to readily access generic data for individual airports. While location specific information has been acquired over time, and is used in response to public enquiries, it is not packaged in a standard format or available in a form that provides the most accessible information for members of the public. Sections of the Airservices noise information website are dated and do not address the known key concerns at each airport.

Recommendation 7: Airservices should update and enhance their suite of fact sheets to cover all major airports in Australia and the key aircraft noise issues of interest to the general public. Airservices should publish these on their website, as well as disseminate them to specific complainants as appropriate. In addition, the remainder of the Airservices noise information website should be reviewed and updated where appropriate.

2.5 Integration

Currently not all noise complaints are handled by the NEU. In some cases, a tower manager may deal directly with complainants, and complaints received in other parts of Airservices (such as those addressed to the CEO or Chairman) are not necessarily passed onto the NEU.

While making non-NEU staff accessible to the public is commendable, an uncoordinated approach to complaints can result in inconsistent responses, and complaint information being lost to the organisation as a whole. It can also result in duplicated effort.

For effective and consistent complaint handling, all complaints should be coordinated through the NEU. This is the only way of ensuring effective collection of data and to assure consistent quality of complaint handling.

Case Study 2 – Tower Manager takes over complaint handling

Mr M from Queensland first submitted his complaint to Airservices in 1995. Some 15 years later, the matter is still unresolved. In 2006 the matter was handed over to the local Tower Manager and the NEU recorded ‘close this job’ in their database. Subsequently, there was an ongoing exchange of emails between the Tower Manager and Mr M. While acknowledging the significant efforts of the Tower Manager, the issue was not resolved, and if anything the information provided only exacerbated the complainant’s concerns.

The complaint was that planes were perceived to be deviating from approved flight paths. The tower manager made a considerable effort to explain the situation, and indeed invited the complainant to visit the control tower. Nevertheless, it was still not clear to Mr M why planes were passing directly over his house and away from the approved flight path. Additionally, there was no evidence to suggest that the matter was escalated to more senior management as was appropriate for such a long running complaint.

Reference: ANO021

Ownership of complaint issues needs to reside with the NEU. Handing the complaint over to local Air Traffic Controllers (ATCs) would only be appropriate if the NEU had oversight and control of communication exchanges between the complainant and ATC.

Recommendation 8: Airservices should amend NEU procedures and other relevant instructions to ensure that ownership of all noise complaints remains with the NEU (or those responsible for the NEU). Where complainants are put in direct contact with ATCs, the ATCs should be advised of the requirement for all communication to be reported to and managed by the NEU. Where complaints are handled by higher levels of management or other parts of Airservices (such as the Government and International Relations branch for approaches via the Minister’s Office or the Department of Infrastructure and Transport) the feedback

loop must be closed so that the NEU can ensure consistency in their responses to complainants.

It is important to use a central complaint team when dealing with large numbers of complaints. At the same time it is equally important to ensure that this team is fully integrated into the organisation as a whole. Complaints that are addressed through the NEU tend to be handled to finality without any investigation or reference back to that part of Airservices responsible for the activity at the centre of the complaint. While not all complaints require the involvement of other parts of Airservices, particularly given the information available to the NEU, there will be cases where some form of investigation or inquiry is necessary to comprehensively address the complaint. However the procedures suggest that it is not until a complaint has been closed, and the complainant has refused to accept the explanation and requested a review, that NEU staff should refer the matter to Air Traffic Control and/or the Corporate and International Affairs group of Airservices for investigation. It is also only at this stage that the procedures refer to possible systemic problems.

Proper integration of complaint handling requires the NEU to be able to conduct investigations, and consider possible systemic issues for all complainants.

Recommendation 9: Airservices should amend NEU procedures, and other relevant organisational instructions, to:

- a) have all complaints logged and managed by the NEU, even where the NEU judges that the matter can best be handled by direct dealings between the complainant and staff from another part of Airservices, and
- b) allow the NEU to instigate an investigation of any complaint or consider systemic issues arising from any complaint, where this is appropriate.

The second aspect of integration critical to effective complaint management, is the integration with other noise complaint agencies. Many complaints received by the ANO have identified the difficulty members of the public face in interpreting where they should go to have their complaint resolved, and indeed there seems to be circumstances where the strict reading of responsibilities suggests that no agency is accountable for certain categories of aircraft noise complaints.

Improved cross-agency coordination and enhancing relationships with airport and aircraft operators for the transfer of complaints that fall outside the role of the NEU (or have elements outside the NEU's control) will significantly improve the experience of the complainant. This includes employing a 'warm transfer' approach, as appropriate, where the complainant is not simply given alternative contact details but is in fact actively transferred to a real person in the other organisation.

Recommendation 10: Airservices should engage actively with other agencies with cross-over accountabilities in aircraft noise issues, and also with airports and aircraft operators as required, to ensure an improved and integrated response is provided to complainants.

3 People

The *Better Practice Guide* identifies the selection, training and management of staff as a key factor in effective complaint management. These people issues are discussed under the four subheadings below.

3.1 Recruitment

The current position descriptions for the NEU Specialists and the NEU Team Leader state a desire for ‘aviation-related qualifications/experience’. Under knowledge and experience, the criteria specify that candidates should have ‘exceptional customer service skills including dealing professionally with complaints and complainants.’ It is important that the complaints team has the expertise to understand and explain aircraft noise issues. It is also critical that the team has high levels of ‘people and communication skills’ required to deal with members of the public, who may be stressed and upset. The selection criteria for NEU staff needs to continue to reflect these vital skills.

3.2 Continuing Training and Learning

While the NEU has a dedicated training structure, there would be value in participation by at least some non-NEU Airservices’ staff with complaint management accountabilities in one of the public sector complaint handling forums will provide ongoing learning opportunities through shared experiences and information about best practice.

As mentioned elsewhere in this review, the ability of NEU staff to deal effectively with difficult complainant behaviour is a key skill requirement. While training may have previously been provided, there is a need for ongoing training and learning. The NEU may wish to consider the training opportunities available from subject matter experts on difficult complaint behaviour (such as those in the NSW Ombudsman’s office) as well as accessing the expertise from the ANO office.

3.3 Review and Feedback

The Commonwealth Ombudsman’s office recently implemented a new quality assurance system that may provide useful reference points for the development of a more formal process of quality assurance for complaint handling in the NEU. In designing such a quality assurance system it is appropriate to incorporate the role of the ANO.

The key features of the system adopted in the Commonwealth Ombudsman’s office are checking of all correspondence before dispatch, sample review of phone conversations, and sample file reviews of completed cases. While it is easy to over-engineer quality assurance processes, it would be useful to institute a process of having all correspondence checked before it is dispatched. This does not necessarily need to be by a supervisor. In the Commonwealth Ombudsman’s office this often involves no more than asking a colleague to read through a letter before it is finalised. This allows many ‘typos’ to be picked up, allows a ‘reality check’ to see if the tone is appropriate and a quick review to see if the content makes sense. Critically, it also allows an opportunity to ensure that the response actually answers all of the questions or queries raised by the complainant.

Where complainants are dissatisfied with the handling of their complaint by Airservices, the role of the ANO will ensure an opportunity for review. The ANO will then be able to provide feedback to the NEU, where appropriate, and there may be value in formalising this feedback process. This is a matter that the ANO will take up directly with Airservices' management. At the same time, however, there will be dissatisfied complainants who do not pursue their case with the ANO and a system of random checking by the NEU of a sample of closed cases, may prove valuable as a basis for review and feedback to NEU staff.

Similarly, a supervisor could occasionally monitor phone conversations (subject to technological capacity and privacy warnings) to provide feedback to NEU staff. To some degree this already occurs on an informal basis. This may be sufficient for the time being, however, the degree of monitoring should be reviewed after changes to procedures or protocols.

The key issue in relation to supervision, as identified in the *Better Practice Guide*, relates to specific acknowledgement concerning difficult and challenging behaviour exhibited by some complainants. Such behaviours can be very stressful for complaint handlers. It is therefore vital to ensure that adequate support is provided for the consequences of dealing with such cases. This may include, but is not limited to, debriefing sessions, support counselling, the capacity to transfer complainants, and training in difficult complainant handling.

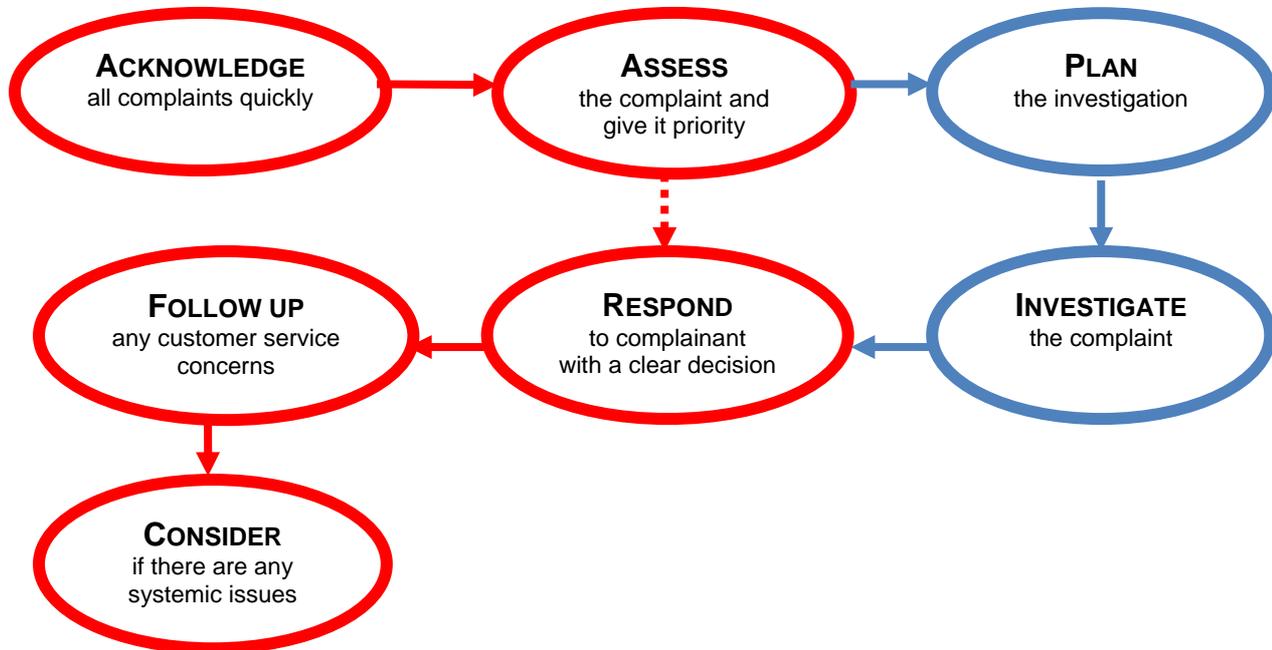
3.4 Other Agency Staff

The *Better Practice Guide* recommends agencies use complaints to evaluate and improve programs and services as well as inform decision making on future service delivery. To achieve this objective, key staff and managers in other parts of the organisation require training and knowledge on the value of complaints and how to use complaints effectively as an input to strategic planning. While it may not be necessary for all staff to receive such training, there is no doubt that Airservices will benefit from a more broadly and deeply embedded culture of being responsive to complaints. This is an area where Airservices may be able to draw on the ANO, and indeed the ANO has already provided briefings to senior staff of the organisation at the CEO's request.

Recommendation 11: Airservices should establish a training package, and relevant supporting material, to assist managers and key decision makers in recognising the value of complaints and the manner in which they can contribute to system and service improvements.

4 Process

The *Better Practice Guide* suggests a five or seven step process for handling complaints, depending on complexity. This process is set out as follows:



4.1 Acknowledgement

Airservices' procedures detail how to manage complaints 'where no response is required', however there is no detail provided to identify which complaints are responded to and which are considered not to require a response. In practice it appears that the NEU responds only to complaints in which a complainant explicitly requests a call-back or asks a specific question that requires a response. This may explain why some complaints referred to the ANO are critical of the lack of response from Airservices.

Case Study 3 – Airservices don't respond

Mrs R from WA has been submitting complaints using the WebTrak system since early 2010. When asked by the ANO if Airservices had responded, she advised:

"NEVER! They just take your complaint and that's it!"

While Mrs R has not explicitly asked for a response, neither has she been advised that she will not be provided with one unless she specifically asks.

Reference: ANO039

The current 'online' complaint form has an explicit question about whether the complainant would like to be contacted. The question on the WebTrak form asks if the complainant would 'like to be contacted by one of our staff?' This is a different question from 'do you want acknowledgement' or 'do you want further information about this matter'?

It is not clear if NEU responses to other approaches (by phone, email, or postal mail) address this question explicitly. This issue is in part covered under the discussion of multiple complaints (see section 4.5 'Response') but should also be addressed through ensuring that each complainant receives a clear acknowledgement of their complaint with advice as to whether they should expect a further response and what the NEU will do to progress their complaint. This response can also be used to make clear that repeated contacts about the same issue may not receive individual or repeated responses.

4.2 Assessment and Assigning Priority

There appears to be no formal assessment or priority assignment process in the NEU Procedures, although certain complainants and/or issues that have become organisationally sensitive will be referred as a matter of course to the Government and International Relations group for action.

Given the responsiveness to complaints, and the strong record on timely responses to complainants, there has been limited need for assigning priorities. On the other hand this might become more of an issue if all the recommendations of this review are accepted and more complaints are investigated. In this case a formal assessment and priority process may be required.

4.3 Planning

Of the complaints assessed as part of this limited review, there was no evidence of formal planning for investigations of specific noise complaints. This is closely linked to the role of the NEU, which is currently focussed on providing information rather than resolving complaints.

Notwithstanding the above, it is worth noting that the provision of information specifically relevant to particular complainants can involve some form of investigation. This is frequently the case, for example, where a complainant is concerned about flights over a particular house and the NEU provides aircraft track plots for relevant flights. Nevertheless, in the current paradigm there is limited need for formal investigation plans.

On the other hand, should the focus of the NEU shift towards resolution of complaints there is likely to be a need to conduct substantial investigations. Examples could include the case where a complainant queried why a flight path could not be moved three kilometres to the east. To answer this question adequately will necessarily involve some investigation. In such situations a formal investigation plan, albeit very short, will ensure that the proposed work is proportionate to the issue, realistic and targeted appropriately. For situations such as these, the NEU should institute the development of investigation plans, to be checked by the NEU Team Leader, whenever substantial investigation work is anticipated.

4.4 Investigation

The NEU conducts a first level track investigation for many complaints. This is to understand, and be in a position to describe, the operations referred to by the complainant. They may also investigate what weather or special circumstances were in place to try to explain to the complainant their particular experience. All of this investigation is useful for informing complainants and the Noise and Flight Path Monitoring System (NFPMS) is an excellent tool for supporting this work.

The emphasis on informing rather than on resolving complaints sees the investigation processes end once information on what occurred is provided to the complainant. The NEU Team Leader advised that on occasions he may contact small operators, when it seems that there may be a benefit in letting them know they are affecting residents. This can be highly effective, although it is not part of the formal role of the NEU, nor a documented or standard practice.

There is generally no referral of issues for analysis, where improvements to noise outcomes could be made, except to the extent that summary reports are provided to Airservices' management, airport stakeholders and some other interested stakeholders (such as Members of Parliament). While advice of emerging issues is raised by the NEU Team Leader to the immediate Manager, who may advise Corporate and International Affairs group, this seems to be for the purpose of forewarning, rather than analysis of whether or not the issues can be resolved. It is possible that opportunities to improve noise outcomes are currently missed as a result of this limited investigation process.

While a formal investigation process will not be warranted on every individual complaint, there would be benefit in maintaining a standard template for investigations, which would detail the purpose of the investigation, the processes to be followed, who retains accountability for the investigation outcome, and how individual, systemic or emerging issues might be identified and managed. By adopting a standard template, Airservices would be in a position to scale the level of the response according to the significance of the complaint and the potential noise benefit. The significance of a complaint needs to be assessed against a number of factors and not be determined purely by the number of complaints or complainants. In other words, a large number of complaints does not necessarily constitute a significant issue, nor does a single complaint suggest there is no need to consider the underlying circumstances.

Recommendation 12: Airservices should implement processes for the NEU that ensure investigations are conducted whenever there is a possibility of individual, systemic or emerging issues being identified that could feed into improved aircraft noise management.

4.5 Response

Many complainants to the ANO mention the courteous, professional, patient and sympathetic hearing that they have received from the NEU staff they deal with. Some have commented that the NEU information provided has been very informative and significantly aided their understanding of the aviation environment in their area. One common frustration, however, is that they do not receive answers to their specific questions about “why can’t it change?” This is perhaps understandable given that the NEU is not currently focussed on investigating or raising these issues for resolution.

As discussed earlier in this review, there is an emphasis on the NEU’s role to record complaints and not to resolve them. Complainants are correctly advised that statistical reports are provided to airports and other parties about the number of complaints on particular topics. As a result there is a misconception that logging more individual complaints and rallying neighbours to do the same may result in the complainants issues being addressed, that might otherwise be ignored, or in greater priority being given to the particular issue in question. The resource demand to respond to such complaints could be better directed to more serious investigations of the issues raised by complainants and improved reporting of the substance of the complaints.

It is a paradox of the current approach that when a single complainant lodges large numbers of complaints they tend to be more likely to be dismissed as a nuisance complainant, rather than being identified as having serious issues. At the same time it clearly benefits no-one when individuals lodge multiple complaints about the same issue. It is important at this point to be clear that complaints about different flights over a house are not necessarily separate issues.

It is essential to distil the real issues. Numerous complaints from a single person will generally reflect a single issue, such as a flight path that the complainant wants moved, concerns over regular breaches of a curfew, or planes straying off a flight path. Where the event recurs it may in some instances be appropriate for the complainant to advise Airservices (the NEU) of this. On the other hand, once the pattern is clear, further reminders add nothing, and indeed Airservices is in a better position to add detail on the file regarding the level of repetition than the complainant is likely to be. Multiple contacts on the one complaint issue should be recorded as that, not as multiple complaints.

At the same time it is important that the NEU should be alert to the fact that a single complaint may contain more than one issue, and that new contacts will sometimes raise new complaint issues. An example of a single complaint raising multiple issues might be where the complaint concerns flights during curfew hours. The complaint might raise two separate issues in a single call, such as concern about a breach of the curfew and concern about the separate issue that flights departing during curfew, whether through breach or legitimate exemption, should use an alternate flight path.

Where a complainant makes multiple calls, a careful assessment should be made to identify all issues raised. Once this has been done, the NEU should be clear with the complainant that the NEU can identify the number of occasions, flights or events that are covered by the issue, and can record those with the complaint (and therefore that the complainant does not need to continue to monitor and report to the NEU with this information). Where a complainant requests feedback on the number of events that occur in respect of an issue, or where the complainant persists in making multiple contacts on one issue in response to repeating events, it may be appropriate for the NEU to include in regular updates to the complainant some information on the level of repetition of the events.

An example of this approach might be where a complainant lodges a complaint every time there is a flight during curfew hours, or every time there is a flight over the complainant's house. In these circumstances it may be appropriate for the NEU to report back to the complainant on this information as recorded by Airservices (over a given period). Monitoring and feedback need only be for a short, but meaningful, sample period, unless there is a significant dispute over the number of events. Airservices would then be in a position to note, file, and record as contacts, but not otherwise action further, contacts from that complainant on that same issue.

Recommendation 13: Airservices should place greater focus on identifying, recording and reporting issues in addition to reporting the numbers of complaints and complainants. The key indicators that should inform an understanding of complaints should be the issues raised, and the number of persons who have complained about those issues, rather than the number of times individuals have contacted the NEU about a particular issue.

A further key component of the response to a complainant is to ensure that complainants' expectations for the outcome are realistic. This involves deliberate 'expectation management' by Airservices generally and by the NEU in particular. A future review by this office will consider information provision on the subject of aircraft noise and that will also address the issue of expectation management. In the current context, Airservices should respond to complaints in a way that avoids creating unrealistic expectations, and indeed that assists in leading complainants to realistic expectations.

Case Study 4 – Perhaps someone else can help you?

Mrs M from WA has been submitting complaints over an extended period, primarily relating to night time operations to and from Perth Airport. There is significant correspondence recorded between Mrs M and Airservices. During this time, Mrs M has asked specific questions relating to operations at Perth Airport with many responses either suggesting that Airservices is unable to assist her, or that she raise her complaint with others:

- “We are sympathetic to your issues, but **we do not make policy**” (text was in bold font in the response to Mrs M)
- “Our role is to receive and record”
- “As aviation is a federal matter you will have to lobby your Federal member to get him to start the change... such as a curfew”
- “Requests for attendance at [Consultative Committee meeting] should be directed to your local member”
- “Federal legislation is a matter best raised directly with the Minister”
- “Many of the complainants are also complaining to their local Federal MP”
- “I am not aware of any programme to review the flight paths, but you may wish to seek the support of your local Federal MP”

Reference: ANO008

In the above case study, writing to the Minister or the local Member is likely to be unsuccessful in introducing a curfew at Perth Airport as the government has been explicit in the Aviation White Paper that it “has no current intention to introduce additional airport curfews”. While the complaint database should record the desire of the complainant for a curfew, the complainant should not be encouraged to waste their time, and that of Ministers and departments, through further correspondence. Additionally, to continually suggest the issue be raised in such a manner may generate unrealistic expectations for the complainant. It would be appropriate to make clear to complainants that a decision for radical action, such as introducing a curfew or closing an airport, is one for the Government, not for Airservices, but that should not extend to suggesting a political course of action to address the issue. The complainant should be advised what the endorsed government position is and left to consider or develop any political approach on their own.

In the same vein it is important that all responses to complainants (especially early responses) should clearly establish realistic expectations about what is possible. This is not to say that a pre-emptory judgment should be made that aircraft noise cannot be managed better than is currently the case, but it is important to be clear that some things are not possible, some things would be very difficult to achieve and some things might be possible. This approach can be assisted with pre-cleared scripts and fact sheets for the NEU on key issues such as airport closures and other matters of Government policy.

Recommendation 14: Airservices should develop clear messages on key issues that provide a realistic picture of what is, and what is not, likely to be achievable. Matters of government policy should be cleared in advance with the Minister.

4.6 Follow-up

Escalation of complaints is detailed in the NEU procedures, however the process is based on the provision of an explanation of the noise rather than resolution of the noise problem. The procedures also cater for further escalation to the next levels of management. In addition, since establishment of the ANO, Airservices has been highly responsive to requests from the ANO for further investigation of specific noise issues.

What is equally apparent is that there is a presumption that aircraft noise is inevitable and being managed as effectively as possible. This has in turn lead to an assumption that following up on noise complaints is about the provision of information, not about identifying systemic or individual opportunities for reform. While the inevitability of aircraft noise is undisputed, and while the presumption that nothing further can be done to manage that noise is potentially true in most cases, there should be a deliberate process to follow up complaints with the intention of identifying those cases where improved management is possible, cognisant of the cost/benefit equation involved in that improvement.

What has become clear already in the short history of the ANO's office is that there are cases where changes can be made to better manage aircraft noise, often involving only minor changes or merely ensuring information about aircraft noise is passed on to the appropriate operator.

Recommendation 15: Airservices should implement processes to ensure that issues identified through complaints are followed up, through the process of consideration, decision and where appropriate, implementation.

4.7 Considering Systemic Issues

The NEU procedures incorporate specific guidance to assist in determining when complaint issues should be referred to Air Traffic Control and/or the Corporate and International Affairs group within Airservices. These referrals, however, seem more centred on explanation of complaints that do not fall under ‘usual circumstances’ as opposed to identifying systemic issues that may necessitate changes to programs or services. Despite this, it is clear from discussions with NEU staff that they are often aware of systemic or emerging issues. On occasion these issues help raise new categories in the NEU database, to aid reporting. This is an excellent first step but needs to be backed up with the next layer of investigation and analysis, which is currently lacking. The combining of investigation and analysis, with the NEU knowledge and understanding of complaints, would contribute to more effective reporting to other areas within the organisation, and can effectively drive business improvements.

The NEU database needs to be improved to enable issues to be better managed. For example, being able to separate whether it is a once-off flight, a certain flight path or a particular operator that is creating concerns will significantly aid the ability of Airservices to find a resolution, or at least improve the information available to complainants. A specific example of this is the current recording of complaints by suburb or postcode but not by flight path. Airservices has already begun a process to upgrade its database to a system able to provide a much better level of analysis. That project should be given high priority within Airservices.

Recommendation 16: Airservices should give priority to the replacement of the NEU complaints database with a system capable of providing more sophisticated analysis of complaint data.

5 Analysis

5.1 Using complaint information to improve programs and services

The analysis of complaints has two key purposes: to improve programs and services and to improve complaint handling. This is only possible if good records are kept, the integrity of the data is sound and the data is regularly analysed. The previous section of this review has already identified the need for an improved complaints database, improved data recording, improved data analysis capacity and a commitment to using complaint data to identify opportunities for improvements to aircraft noise management.

In undertaking this review, it has also become apparent that there are issues surrounding how multiple contacts by individuals are recorded. Complaints by an individual, who elects to complain separately with each specific event, are recorded differently from a complaint from an individual who compiles the individual events and subsequently makes a single complaint. In other words, if Mr X rings and complains that 10 aircraft overflew his house yesterday, it would be recorded as one noise complaint, however if Mr X had called after each event, it would be recorded as 10 complaints.

Case Study 4 – Vote early, vote often

Mr W from Queensland submitted a report to the ANO regarding an anomaly in the statistical data provided by Airservices in relation to noise complaints.

Mr W, who belongs to a particular noise action group, was advised by the NEU that there had been 1,678 noise complaints for locations south of the Brisbane river for the 12 months 1/5/09 to 30/4/10. Mr W claimed that in the 7 months and 1 week period between 30/9/09 and 6/5/10 (albeit the final date is a week after the Airservices date), the secretary of the action group alone had lodged 1,881 complaints.

Airservices responded advising that it had a policy of 'one contact = one complaint'. An FOI application revealed that this policy was not formally included in written procedures, although it is a standard practice of the NEU. This highlights three concerns: the need for formalised procedures for recording complaint issues, the policy for recording of multiple contacts and events, and the need for careful consideration as to the implications of the procedures adopted.

Reference: ANO005

This case study brings into question the integrity of the statistical data, or at the very least, highlights the need to provide clarity and explanation when providing data both internally and externally. In the above case, Airservices' operational staff may have assumed that on average there were less than five reported incidents per day for operations south of the river (as defined by the existing procedures), as opposed to at least 10 reported incidents per day from one complainant alone. This in turn may have provided an inaccurate assumption into any traffic planning activities for the area and limited the opportunity to 'improve programs and services'.

The key point here is that there needs to be a consistent approach to data recording that provides a clear picture of community and individual concern. As discussed above, it is the view of the ANO that the clearest picture can be provided by focussing on complaint issues and the number of persons complaining, rather than the number of contacts from complainants or the number of incidents (repetitions) reported by a complainant.

Recommendation 17: Airservices should develop a formal, written and published instruction on recording relevant statistical details about issues, complaints, complainants and contacts.

5.2 Using complaint information to improve complaint handling

It is important to recognise that the use of data relies on data being appropriately recorded, easily retrievable and in a suitable format. As noted above, it should be a priority for Airservices to upgrade its complaints database. Any such upgrade must include both the capacity to record and retrieve all relevant data, but also the capacity to analyse data.

6 Other Issues

6.1 Active noise management

The *Better Practice Guide* provides a good template for the design of a complaint handling process that will maximise Airservices' capacity to exploit complaints to achieve best practice complaint handling, and best practice aircraft noise management. The recommendations in this review will go a long way to supporting Airservices in achieving these outcomes. At the same time, this review of complaint handling has highlighted a number of issues that are either at the fringe of Airservices' role or outside its role entirely. These issues are acknowledged with the intent that this will draw attention to them, and assist the ANO in pursuing these issues with other agencies that may have a role to play in learning from aircraft noise complaints.

An obvious strategy in reducing noise complaints is to adopt environmentally sound practices, including minimising the noise impacts of activities. For example, leases issued by airports to lessees (for example, aircraft operators based at the airport) may include a provision requesting the lessor to minimise the effect of noise on other stakeholders. A typical example is reflected in the case study below.

Case Study 5 – When the 'buck' should be passed

Tyagarah Airport is located on the east coast of Australia, just north of Byron Bay. It is maintained and administered by the Byron Shire Council. In January 2009, the Council established a sub-lease with the Byron Power Gliding Club Incorporated to allow the club to establish a hangar and to carry out associated activities. The lease includes a clause relating to noise which states: *'The Sublessee will take all reasonable measures to minimise ... noise disturbance to other Sublessee's [and] members of the public'*.

Reference: ANO029

The actions by the Byron Shire Council are commendable. While the clause lacks specifics, it at least identifies the intent of the Council and also the Council's expectations of the Gliding Club. The ANO is currently considering how to encourage the use of similar clauses by other councils and agencies managing airports.

Airservices may have a role to play in passing on obligations to minimise aircraft noise. Airservices enters into a range of agreements with operators, often referred to as Letters of Agreement, where inclusion of a provision to minimise aircraft noise may be appropriate. The inclusion of a clause similar to that employed by Byron Shire Council, would demonstrate the priority Airservices places on environmental management (in relation to noise) as well as ensuring that noise impacts are an explicit consideration in the establishment of the procedures contained in the Letters of Agreement.

Recommendation 18: Airservices should develop a standard clause relating to the minimisation of noise, for inclusion in operational Letters of Agreement with aircraft operators, where appropriate.

A separate problem in managing aircraft noise is the assumption that those purchasing land near airports or under flight paths are or should be aware of aircraft noise. The reality is that information regarding aircraft noise is not generally provided as part of the process of land transfers. While lawyers will undertake numerous enquiries about land that a client wishes to purchase, enquiries about aircraft noise issues are not a standard part of the process. The ANO will be considering how to improve the information about aircraft noise and have it included as a key element in every land transaction.

This issue comes into sharp focus where there is a proposal to develop land that is in either an existing high aircraft noise zone or a zone in which there is expected to be a high level of aircraft noise in the future. In these situations it may be appropriate to consider a more explicit and rigorous process, such as including aircraft noise information on the land title itself, similar to caveats relating to easements, or other ground level intrusions that are recorded on the land title. Again, this is a matter that the ANO will pursue in other forums.

As issues such as these are revealed by complaint data it is important that there be an agency responsible for pursuing them. At this stage this is outside the role of Airservices. The ANO will pick up the role while it is not unduly onerous and within the office's limited resource capacity. In the future it may be necessary to reconsider how such issues will be addressed.

Attachment 1 – Recommendations

Review recommendations
<p>Recommendation 1: Airservices should amend its systems and procedures to support the NEU seeking a suitable remedy for those complaints where it may be possible to improve the noise outcome, and ensure follow-up on such opportunities. It is acknowledged that an improved noise outcome may only be feasible for a small minority of the total noise complaints received.</p>
<p>Recommendation 2: Airservices should amend the objectives of the NEU, as stated in the NEU procedures, to include ‘complaint resolution through the provision of more targeted information’. In addition, Airservices should develop and implement systems and tools to assist with this new objective.</p>
<p>Recommendation 3: Airservices should make a senior manager accountable for capturing, recording and tracking through to implementation, noise improvement opportunities arising from complaints.</p>
<p>Recommendation 4: Airservices should review the resource requirement for the NEU when implementing the changes recommended in this review.</p>
<p>Recommendation 5: Airservices, in adopting the other recommendations included within this review, should amend the name of the NEU to Noise Complaints Unit (NCU) or similar to reflect the unit’s role in resolving complaints.</p>
<p>Recommendation 6: Airservices should review and expand their written procedures and protocols for responding to unreasonable complainant behaviours.</p>
<p>Recommendation 7: Airservices should update and enhance their suite of fact sheets to cover all major airports in Australia and the key aircraft noise issues of interest to the general public. Airservices should publish these on their website, as well as disseminate them to specific complainants as appropriate. In addition, the remainder of the Airservices noise information website should be reviewed and updated where appropriate.</p>
<p>Recommendation 8: Airservices should amend NEU procedures and other relevant instructions to ensure that ownership of all noise complaints remains with the NEU (or those responsible for the NEU). Where complainants are put in direct contact with ATCs, the ATCs should be advised of the requirement for all communication to be reported to and managed by the NEU. Where complaints are handled by higher levels of management or other parts of Airservices (such as the Government and International Relations branch for approaches via the Minister’s Office or the Department of Infrastructure and Transport) the feedback loop must be closed so that the NEU can ensure consistency in their responses to complainants.</p>

Review recommendations
<p>Recommendation 9: Airservices should amend NEU procedures, and other relevant organisational instructions, to:</p> <p>a) have all complaints logged and managed by the NEU, even where the NEU judges that the matter can best be handled by direct dealings between the complainant and staff from another part of Airservices, and</p> <p>b) allow the NEU to instigate an investigation of any complaint or consider systemic issues arising from any complaint, where this is appropriate.</p>
<p>Recommendation 10: Airservices should engage actively with other agencies with cross-over accountabilities in aircraft noise issues, and also with airports and aircraft operators as required, to ensure an improved and integrated response is provided to complainants.</p>
<p>Recommendation 11: Airservices should establish a training package, and relevant supporting material, to assist managers and key decision makers in recognising the value of complaints and the manner in which they can contribute to system and service improvements.</p>
<p>Recommendation 12: Airservices should implement processes for the NEU that ensure investigations are conducted whenever there is a possibility of individual, systemic or emerging issues being identified that could feed into improved aircraft noise management.</p>
<p>Recommendation 13: Airservices should place greater focus on identifying, recording and reporting issues in addition to reporting the numbers of complaints and complainants. The key indicators that should inform an understanding of complaints should be the issues raised, and the number of persons who have complained about those issues, rather than the number of times individuals have contacted the NEU about a particular issue.</p>
<p>Recommendation 14: should develop clear messages on key issues that provide a realistic picture of what is, and what is not, likely to be achievable. Matters of government policy should be cleared in advance with the Minister.</p>
<p>Recommendation 15: Airservices should implement processes to ensure that issues identified through complaints are followed up, through the process of consideration, decision and where appropriate, implementation.</p>
<p>Recommendation 16: Airservices should give priority to the replacement of the NEU complaints database with a system capable of providing more sophisticated analysis of complaint data.</p>
<p>Recommendation 17: Airservices should develop a formal, written and published instruction on recording relevant statistical details about issues, complaints, complainants and contacts.</p>
<p>Recommendation 18: Airservices should develop a standard clause relating to the minimisation of noise, for inclusion in operational Letters of Agreement with aircraft operators, where appropriate.</p>

Attachment 2 – Terms of Reference

Review of Airservices Australia’s Handling of Noise Complaints

<p>Review Objectives</p>	<p>To review the effectiveness of Airservices Australia’s handling of complaints and enquiries relating to aircraft noise, and to recommend improvements where appropriate.</p> <p>This will include benchmarking against the five elements of effective complaint handling outlined in the Commonwealth Ombudsman’s publication <i>A Better Practice Guide to Complaint Handling</i> (April 2009):</p> <ul style="list-style-type: none"> • Culture: Agencies must value complaints as a means of strengthening their administration and improving their relations with the public. • Principles: An effective complaint handling system must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration. • People: Complaint handling staff must be skilled and professional. • Process: The seven stages of complaint handling—acknowledgment, assessment, planning, investigation, response, review, and consideration of systemic issues—should be clearly outlined. • Analysis: Information about complaints should be examined as part of a continuous process of organisational review and improvement. 	
<p>Review Scope</p>	<p>The review will examine:</p> <ul style="list-style-type: none"> • the policies, procedures, processes and systems in place relating to complaint handling. • Airservices’ complaint, enquiry, records of responses and performance statistics for a 12 month period (1 July 2009 to 30 Jun 2010) • A number of case studies of individual complaints identified by both Airservices Australia and the Aircraft Noise Ombudsman • Interviews with relevant staff. • Examination of responses provided to stakeholders with particular emphasis on complainants. • The level of resourcing applied to the complaint handling process. • International benchmarks for aircraft noise complaint management. 	
<p>Expected date of report issue</p>	<p>Draft: December 2010</p>	<p>Final: February 2011</p>