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Complaint Management Procedure

Version 4, February 2025

Version Control

Version	Date	Change description
1.0	November 2021	-
2	August 2023	Review of procedures to bring into alignment with the purpose of the document after the separation of the investigation guidelines from the complaint handling procedure.
3	February 2024	Inclusion about using Translation Service when requested by complainant and update to links no longer working
4	February 2025	Clarification around contacting joint complainants when requesting permission and direct referrals to agencies

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1 Background

This Complaint Handling Procedure (CHP) is to be used in conjunction with the *Aircraft Noise Ombudsman (ANO) Investigative Guidelines* and *ANO Complaints System (ANOCS) manual*.

The CHP provides guidance on managing both single complaints (most common) and those which become part of a multi-complaint review (MCR). It follows the complaint handling management and decision-making process from beginning to end and includes a section on management of complaints which fall outside the ANO's jurisdiction. Importantly, this manual addresses the management of difficult, aggressive, or abusive complainants, with a focus on staff welfare. All complaint correspondence is recorded in the ANO's complaint management system (ANOCS). Please refer to the ANOCS manual for the relevant procedures.

As with all the ANO manuals, it is considered a living document and will be updated as necessary. Examples of standard wording used throughout this document should be used as guidance only. It is important to ensure that communication to individual complainants responds appropriately to their correspondence.

2 Incoming Complaints

Incoming complaints can be received via email (most common), telephone or post. Complaints which are lodged via the form available on the ANO website are also received via email. All complaints received by the ANO are recorded in ANOCS.

2.1 Single Complaints

When a single complaint is received by the ANO it is assessed to see if it is within the ANO's jurisdiction, as established by the ANO Charter. For further information on the ANO's jurisdiction, please see the *ANO Investigative Guidelines*. The following table provides advice on actions required for a range of scenarios in this *assessment process*.

Please note that this table provides general guidance, and each contact should be considered on its own merit.

Complaint Consideration	Action
Does the complaint relate to the handling of Airservices Australia's (Airservices) or a Department of Defence (Defence) aircraft noise complaint, community engagement processes, or the presentation and distribution of civil or Defence aircraft noise related information?	<p>If no, the matter is outside the ANO's jurisdiction, and the complainant can be provided advice on the relevant agency contact. If the matter relates to environmental concerns or matters such as curfews, please see annexure A to assist the complainant with additional information. All incoming complaints are recorded in ANOCS.</p> <p>If yes see below.</p>
Has the concern been raised or investigated by Airservices or Defence in the first instance?	<p>Concern not yet raised with Airservices or Defence:</p> <p>If the complainant has not yet raised the complaint to either Airservices or Defence, the complaint should be registered into the ANOCS system, and the complainant referred to Airservices or Defence to lodge their complaint and wait for the agency to respond.</p> <p>Complaint has been investigated by Airservices or Defence and closed (no longer an active case) or if Airservices or Defence advise they are not going to respond (complainant may be on a management plan or no new issue has been raised).</p> <p>If the matter has been investigated and is closed, see below.</p>
Is there still an open case with Airservices or Defence?	Airservices or Defence should be contacted to request confirmation the matter is now closed, or that they will not be responding to the complainant. Additionally, a request for all or

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<p>If a complaint has been raised with Airservices or Defence, have the agencies completed their investigation and is the case now closed? (Note as per the Charter, the ANO cannot investigate when the agency has an open case with the complainant.</p>	<p>relevant correspondence/ complaint data (sometimes date limited since last ANO review) should be requested. The complaint or a summary should be included in this request.</p>
<p>If a complaint has been previously considered in full by the ANO office, and substantively new information has not been raised since the last contact, the ANO Charter prevents the ANO from reviewing that complaint (Clause 32(d)). Complainant has not been advised that the ANO will not correspond further on the matter.</p>	<p>In the first instance, consider whether the complainant is clear regarding a previously provided ANO outcome. If the complainant is unclear about the previous outcome, clarify these details with the complainant.</p> <p>If the complainant has made contact multiple times and received clarification on those occasions: provide a summary of the outcome, notification that the ANO office has no additional information to offer, and advice that the ANO will consider, but not respond to further correspondence on the same matter.</p> <p>Care should be taken to ensure the complainant is not raising a new issue or complaint not previously dealt with. If a new issue or complaint is being raised, a new case should be opened, and the new issue dealt with as a new complaint.</p> <p>If the issue or complaint has been previously dealt with, the complaint(s) and ANO response should be filed under the existing case in ANOCS, as it is an extension of that case. This must also be tagged in ANOCS (as either COMPLAINT, or COMPLAINT RESPONDED).</p>
<p>If a complaint has been raised by an existing complainant and any of the below apply:</p> <ul style="list-style-type: none"> • The complaint is not directly addressed to the ANO, who is either listed as a CC or in the 'To line' but with the actual message identifying the target audience (often an agency, airport, or a politician). • The complainant has received correspondence addressing the specific concerns raised in their correspondence from the ANO office, that case has been closed and the complainant was advised that we would no longer respond on that matter. • Periods of mass mailing have occurred or continue to occur, without any change in 	<p>If there is additional information that the ANO office can offer (for example on an Agency PIR's progress since the last correspondence), that is relevant to the complainant, a response should be provided (excluding where the complaint is abusive). When a response is provided, the incoming complaint and response should be saved in ANOCs under the most recent case that relates to the complaint. For example, if there are two cases related to 2 airports, file against the case with the correct airport for the new correspondence. The incoming complaint is tagged as "Complaint Responded".</p> <p>If no new information exists since previous ANO response, this correspondence should be filed against the most relevant previous case (see</p>

<p>subject and the complainant was advised that we would no longer respond on that matter unless substantively new information is raised.</p> <ul style="list-style-type: none"> The complaint is abusive, and the complainant has been advised that the ANO office will not respond to further correspondence of an abusive nature. 	<p>ANOCs manual) and tagged as a “Complaint”. No response or further action required.</p> <p>Please see ANOCs Manual for additional information on tagging complaints*.</p>
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In all cases, a complaint (and client details if not existing) should be added to ANOCS (see *ANOCs Manual* for further instructions).

As specified by Clause 30 of the Charter, under ‘exceptional circumstances’ the ANO may open a review into a matter prior to the complaint being brought to the relevant agencies. Examples of times when this may occur includes where there are allegations of targeting or where the agency cannot practicably remedy a situation. Further information on this is provided within the *ANO Investigative Guidelines* document. For the ANO office to accept a complaint for review without it first being considered by the relevant agency, the Ombudsman must provide approval.

2.2 Complainant referral to Airservices or Defence

It is common for complainants to be confused as to the role and responsibility of the ANO and make complaints to the ANO prior to raising them with the relevant agency. In such circumstances, the complainant should be provided with info about the role of the ANO and referred to the appropriate agency. A standardised draft email has been developed to ensure clear and concise information is provided to the complainant in the first instance where it is not clear a complaint has been made to Airservices or Defence.

Please note that the ANO office addresses complainants by their first name and surname, rather than their title and surname. In instances where complainants do not provide a first name, and only provide a title and surname, then they will be addressed by their title and surname.

Example 1 below (For a first-time complainant) provides guidance on a referral to Airservices. Please see current email drafts for Defence and Airservices, under the ‘Drafts’ section of the ANO Inbox for further guidance.

Dear XXXXX,

Thank you for contacting the Aircraft Noise Ombudsman (ANO) office, with respect to your concerns relating to XXXXX. I acknowledge the impact of aircraft noise in XXXXX.

* The decision to tag a complaint in ANOCS, rather than open a new case, relates to the substance of the complaint. A substantively new complaint which raises different issues to previous correspondence warrants opening a new case, whereas a complaint which raises concerns which have previously been raised would generally be filed as a complaint. Tagging a complaint enables a complaint to be recorded and reported on while being more efficient than opening a new case in ANOCS.

It appears that this may be your first correspondence with the ANO office. As such, I would like to take this opportunity to highlight the role of the ANO, and how we may assist you. The role and powers of the ANO are established under the [ANO Charter](#), which prescribes that the ANO may review the handling of complaints or enquiries made to Airservices Australia (Airservices) about aircraft noise, including in respect of community engagement and the presentation and distribution of information concerning aircraft noise. The ANO makes recommendations to Airservices for improvements relating to these matters. Please note that the ANO has no power to change flight paths, suspend flights, or recommend curfews, with the primary function relevant to your complaint being to review administrative actions relating to the handling of aircraft noise complaints by Airservices that you have made.

Under the Charter, the ANO can only investigate the substance of a complaint if Airservices has first had the opportunity to respond to it. If you are seeking to make an aircraft noise complaint, please contact Airservices through one of the following processes:

- Making an online submission, through the form accessible [here](#).
- Via telephone on 1800 802 584 (free call). Please note that this number is operated on weekdays between 10am and 4pm Australian Eastern Standard Time.
- By post to: Noise Complaints and Information Service, PO Box 211, Mascot NSW 1460

Once you submit your complaint or enquiry to Airservices, you will need to wait for them to respond. However, if you do not hear from Airservices within 21 days of making your complaint, or if upon receiving a response you remain unsatisfied with how Airservices have managed your complaint, please contact the ANO office with the specific concerns you have relating to Airservices' management of your complaint, and we may consider this matter further.

At this time, we will not take any further action unless we hear from you again.

Kind regards

If the complainant has been to either Airservices or Defence in relation to their noise complaint and are not satisfied with the response, the ANO may have jurisdiction to conduct a review of the agency's handling of the complaint. It is a common misconception amongst complainants that the ANO's role is to reinvestigate the initial complaint the complainant submitted to Defence or Airservices and compel the agency to act. Consequently, ANO staff will often be required to request that complainants clarify their specific concerns relating to the handling of their complaint. To ensure that complainant's organisational expectations of the ANO are properly managed, ANO staff must clearly communicate the role and powers of the ANO to complainants at the earliest possible opportunity.

The below is an example of the advice that can be provided – the advice should be tailored to the organisation that is being reviewed.

I would like to clarify that the Aircraft Noise Ombudsman (ANO) is an independent administrative office that (as per the ANO [Charter](#)):

- Reviews the handling of complaints or enquiries made to Airservices or Defence about aircraft noise, including in respect of community engagement and presentation and distribution of information concerning aircraft noise.
- Monitors and reports on the effectiveness of community engagement processes relating to aircraft noise undertaken by Airservices and Defence.
- Monitors and reports on the effectiveness of the presentation and distribution of aircraft noise-related information by Airservices and Defence.
- Undertakes systemic issue reviews of aircraft noise management by Airservices and Defence.

The ANO makes recommendations to Airservices and Defence for improvements relating to these matters. The ANO acts with independence, integrity, and impartiality in performing their functions and exercising their powers, and is not an advocate for any organisation, special interest group or person.

Please note, the ANO has no power to change flight paths, or suspend flights.

2.3 Direct Referral to Agency

On occasion, the ANO may request that either Airservices or Defence accept a complaint as a direct referral. This is a discretionary process and determining whether to directly refer a complaint to an agency should account for the specific context of the case. For a direct referral to be made to an agency, the complaint must be within the agency's remit and their contact details must have been provided. Situations in which a complaint may be directly referred to the relevant agency could include where the complainant is a first-time complainant and their complaint is sufficiently detailed to sustain an investigation by the relevant agency or where the complainant has raised accessibility concerns.

2.4 Multi-Complaint Review (MCR)

The ANO may review multiple complaints as part of a single investigation. This can be where the complaints relate to similar issues and are otherwise within the jurisdiction of the ANO. The multiple complaints may come from a single complainant or from separate individuals. The decision to conduct a multi-complaint review is at the discretion of the ANO. Further information on multi-complaint reviews is provided in the *ANO Investigative Guidelines*.

If the ANO office has received several complaints on the same concern either from the same complaint or multi-complaints where there appears to be serious concerns as to the complaint handling or community engagement processes, the matter should be escalated to the ANO for consideration. Once the ANO has decided to manage the reviews under a multi-complaint review, the complainants should be advised of this.

Guidance on a response to a MCR submission is provided in the sample letter below:

Thank you for raising your concerns with the Aircraft Noise Ombudsman (ANO) regarding the Department of Defence's (Defence's) handling of your aircraft noise complaint. This submission was in relation to xxxx.

I note that this is your first contact with the ANO office and as such, want to take this opportunity to provide some information about the role of the ANO and how we can assist you. Under the [ANO Charter](#), the role and powers of the ANO are to review the handling of complaints or enquiries made to Defence about aircraft noise, including in respect of community engagement and presentation and distribution of information concerning aircraft noise. The ANO makes recommendations to Defence for improvements relating to these matters. The ANO has no power to change flight paths or suspend flights with the primary function relevant to your complaint being to review administrative actions relating to the handling of aircraft noise complaints by Defence' that you have made.

As the ANO has received several complaints which raised these same issues, the ANO will review these single complaints as part of a multi complaint review (MCR) pursuant to Clause 47 of the ANO Charter.

As part of this MCR, the ANO office will obtain copies of all correspondence between Defence and each complainant, as well as documentation relating to Defence's community engagement activities, as relevant to your concerns, and be in contact with you in due course.

3 Investigation Process – Administrative Review

Once a matter has been accepted following the above initial complaint considerations, the staff member managing the process to date, will accept the review in ANOCS and assign the case to 'awaiting assignment'. When a staff member is ready to take on a new review, the oldest 'awaiting assignment' case should be considered first. The Office Manager has the final decision regarding appropriateness of allocation of a case to a particular staff member.

To commence a review, data must be requested and received from Airservices or Defence. If data has not already been requested as part of the initial consideration process, data should be requested from Airservices (NCIS – requests should be addressed to the NCIS Line Leader with a CC to

[REDACTED], or Community Engagement - [REDACTED]) or Defence (through the identified Staff Officer for Aircraft Noise Management and cc. the Defence noise email [REDACTED]). Any request for data should have the complaint or substance of the complaint attached to allow for an understanding of what information is required. Upon receipt, confirmation that the data has been received from Airservices or Defence is required and recorded in ANOCS.

Where a new review is commenced for a complainant who has had previous ANO reviews, it is important that the new review does not consider issues which have previously been reviewed unless substantively new information is raised. Additionally, any request to the Agency for correspondence should only be from the date of the most recent data received by the ANO office.

Airservices and Defence should then provide the relevant complaint history and correspondence between themselves and the complainants.

Once the information is received and added to ANOCS, a further review can now be completed. In most single complaint reviews, the complaint information and correspondence along with the information from the complainant in the originating complaint to the ANO should be sufficient to provide a detailed outcome. If, however, further information is required the reviewer can make further inquiries through the NCIS Line Leader, NCIS Senior Complaint Specialists, Community Engagement team or Defence Staff Officer to clarify a matter or receive additional data or information to assist in the review.

3.1 Obtaining phone recording/transcript Data – Airservices

The ANO may request telephone transcripts from Airservices, Noise Complaint and Information Service (NCIS) to assist with a review of complaint handling. NCIS policy dictates that a management review will be prepared for submission to the ANO with following information.

- complainant's complaint history
- demeanour and behaviour of the complainant in their contact(s) with NCIS
- summary of the tone of the conversation(s)
- Manager's conclusions about the conduct of the conversation
- context, such as complaint volume and the daily environment.

The NCIS will then provide a deidentified transcript verbatim.

Any comments made by the ANO about the handling of a phone call based on the review of a transcript will not be used to review NCIS staff performances. Transcripts, prepared in response to an ANO request cannot be released to any other organisation, agency or individual, including the complainant who is party to the call.

If, after consideration of the transcript and the Management Review, the ANO considers that review of the voice recording is warranted, a further Request for Information should be submitted to NCIS.

NCIS have stipulated that the ANO may listen to a recording subject to these conditions:

- Both the NCIS Manager and the Community Engagement Manager must agree that this would benefit the ANO's investigation. The staff member on the recording must be consulted before agreement is given and their view must be considered.
- A copy of the recording will not be released. The recording must be listened to at an Airservices' location.

If the NCIS Manager and/or the Community Engagement Manager do not agree that listening to the recording would benefit the ANO's investigation, the reasons for this decision will be provided in writing to the ANO.

3.2 Obtaining phone recording/transcript Data – Defence

When a complainant has used the recommended procedure of telephoning their closest Military base to complain, there is no recording option on these phone lines. However, if calls to the switchboard are considered pertinent to a complaint, these can be requested from the Defence Liaison Officer. The Defence Liaison Officer would need to meet with an ANO representative to listen to the recordings. Due to the security classification level of recordings, the recordings are unable to be released by Defence.

3.3 Key considerations regarding jurisdiction

Complaints received by the ANO office often contain a range of concerns. At times, a single complaint may raise some concerns that are within the remit of the ANO, and others that rest outside the ANO's remit. Where concerns are raised that are outside the remit of the ANO Charter, the reviewer should clearly explain to the complainant that this is the case. Please refer to the *ANO Investigative Guidelines* for further information with respect to the ANO's jurisdiction. If possible, the complainant should be referred to an agency with jurisdiction over the issue.

Examples of concerns frequently raised that are outside the jurisdiction of the ANO include:

- Requests for curfews.
- Concerns regarding health.
- Environmental concerns.
- Conflict of interests between the ANO and Airservices.

Table A provides a number of examples for matters that are outside of the ANO's remit.

Table A – Live document – Key quotes/responses

It is essential to note that the below examples provide guidance on key information which may be relevant when particular concerns are raised. Each complaint must be treated on its own merit, and the below wording should be tailored to ensure that concerns are appropriately addressed and provided relevant information.

Curfew inquiries	<p><u>Matters outside of the ANO Charter</u></p> <p>The introduction of a curfew at the Brisbane Airport is a matter of Government policy and would require a legislative process at the federal level. The responsibility for curfews is held by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts. More information, including how to submit correspondence to the Department can be found at: https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aircraft-noise/airport-curfews</p>
Environmental concerns	<p><u>Aircraft emissions</u></p> <p>The Department of Infrastructure, Transport, Regional Development Communications, and the Arts advises the federal government on the policy and regulatory framework for Australian airports and the aviation industry and provides policy advice to the Minister on Australian airspace, aircraft noise and emissions. Information can be found on their website here: https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-emissions</p> <p><u>Aircraft Noise</u></p> <p>The Department of Infrastructure, Transport, Regional Development, Communications and the Arts advises the federal government on the policy and regulatory framework for Australian airports and the aviation industry and provides policy advice to the Minister on Australian airspace, aircraft noise and emissions. Information can be found on their website here: https://www.infrastructure.gov.au/aviation/environmental/aircraft-noise/index.aspx</p> <p>Aircraft noise is regulated through the <i>Air Navigation (Aircraft Noise) Regulations 2018</i> that can be found here: https://www.legislation.gov.au/Details/F2022C00046. These relate to the level of noise created by aircraft rather than the impact of noise on residents under flight paths.</p> <p><u>Placement of Aircservices noise monitors in your area</u></p> <p>Aircservices hold responsibility for the placement and management of Aircraft Noise Monitors through their Noise and Flight Path Monitoring System (NFPMS). Further information can be obtained on their website which also answers some frequently asked questions.</p>

	https://www.airservicesaustralia.com/community/environment/aircraft-noise/monitoring-aircraft-noise/
Health Concerns	I note that you have raised concerns about the impact of aircraft noise on the community's health. Please be aware that the staff within the ANO office are not public health experts and in no position to make findings or recommendations in relation to public health matters. A body such as your state or the federal Department of Health and Aged Care may be better suited to considering and addressing your concerns related to the potential health impact of aircraft flying above your home.
Safety Concerns	<p>The Civil Aviation Safety Authority (CASA) sets rules for aircraft rules and regulations. Whilst I encourage you to review the CASA website at www.casa.gov.au, I can confirm flight crew and aircraft must comply with the rules and regulations including those for altitude, which in most circumstances means aircraft must remain above 1000 feet over suburban and 500 feet over any other areas, unless in the process of taking-off or landing. CASA is also responsible for designating classes of airspace, and information on regulations for low flying is accessible through their webpage.</p> <p>If you wish to raise a concern about the safety of an aircraft operation, please use the following CASA form.</p> <p>https://www.casa.gov.au/about-us/contact-us/report-concerns-about-aviation-safety</p>
Commonwealth Ombudsman	<p>I understand that you may be disappointed with the outcome of your complaint and as such, wish to highlight the options available to you in this case. If you are not satisfied with the handling of your complaint by the ANO office, you are able to seek a review by the Commonwealth Ombudsman. The Commonwealth Ombudsman's review would likely consider:</p> <ul style="list-style-type: none"> • the process adopted by our office and whether it was fair and adequate to address the complaint issues you raised; and • the merit of our conclusions and whether they were properly explained to you. <p>The Commonwealth Ombudsman can be contacted through one of the methods at: https://www.ombudsman.gov.au/contact-us.</p>
Compensation requests	As far as I am aware there are no current programs in Australia for the government compensating, reimbursing, or subsidising individuals for the costs associated with the impact of flight paths including costs incurred soundproofing their homes against aircraft noise. There was a limited Government-funded Sydney Airport noise insulation program established in 1995 to ameliorate the impact of aircraft noise following the opening of the third runway at that airport. Residential properties within the Australian Noise Exposure Index (ANEI) 30 contour and public buildings (schools, churches, day care centres and hospitals) in the ANEI 25 contour were eligible for assistance under the program. In 2000, an

	<p>equivalent program was established for Adelaide Airport, with similar eligibility criteria. Unfortunately, the introduction of a compensation program is also outside the scope of Airservices or this office to pursue.</p>
Mental Health Concerns	<p>I understand that this response will not resolve your ongoing concern regarding aircraft noise, and I acknowledge that you have shared how negatively aircraft noise is impacting your mental health. I would encourage you to seek assistance from a trusted medical professional you know, or one of the following organisations, whenever needed. Please note that the below services are free to access and available 24/7.</p> <ul style="list-style-type: none">• Lifeline:<ul style="list-style-type: none">○ Phone: 13 11 14○ Website: https://www.lifeline.org.au/• Beyond Blue:<ul style="list-style-type: none">○ Phone: 1300 22 4636○ https://www.beyondblue.org.au/• Sane Australia:<ul style="list-style-type: none">○ Phone: 1800 18 7263○ Website: https://sane.org

Departmental responsibilities	<p>As noted above:</p> <p>The Department of Infrastructure, Transport, Regional Development, Communications, and the Arts (the Department), advises the federal government on the policy and regulatory framework for Australian airports and the aviation industry and provides policy advice to the Minister on Australian airspace, aircraft noise and emissions. Information can be found on their website here:</p> <p>Aircraft noise:</p> <p>https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aircraft-noise</p> <p>Aircraft emissions:</p> <p>https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-emissions</p> <p>The Department also provides information on airport planning and regulation which you may find helpful. This webpage can be found here:</p> <p>https://www.infrastructure.gov.au/aviation/airport/planning/index.aspx</p>
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3.4 Provision of Outcomes

Once a review has been conducted, it will be provided to the complainant. Depending on the length of the review, it may be provided in the body of an email or attached as a PDF to an email. The body of such an email should advise the complainant that a review has been conducted, and that the outcome is attached. In cases where the outcome is provided as a PDF, the ANO letterhead template stored in Content Manager under 'Administration – Stationary – Standard Letters' should be used, and the PDF should be password locked from editing. The outcome should also be forwarded to the relevant agency subject to the review. In cases where the complainant is seeking anonymity from the agency (See Section 5.2 for further details), the provision of the outcome should be tailored in such a way so as to maintain this anonymity.

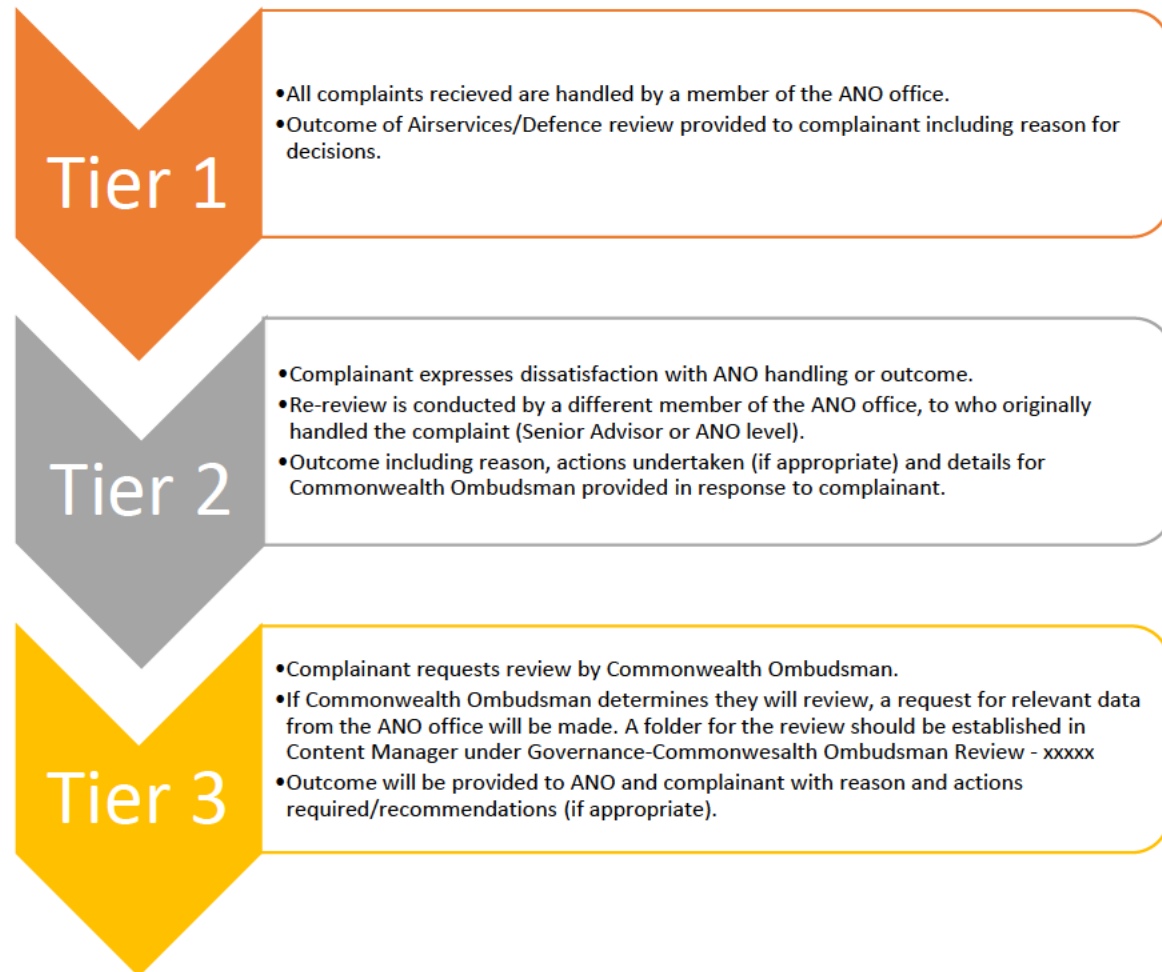
Where the review results in an assessment that, in the opinion of the ANO, the conduct of the relevant agency has been unfair or unreasonable the ANO prepares an assessment to be provided to the relevant agency. The agency will then be given a reasonable opportunity, to respond to the assessment. If, in the opinion of the ANO, the agency does not take reasonable steps to resolve the matter the ANO will issue a report to the Airservices Board or Chief of Airforce, as appropriate. Further information on this process is outlined in the *ANO Investigative Guidelines*.

3.5 Closure Actions

At the completion of a review, the assigned staff member should review the files / information saved in the N: drive for relevance to the case. All relevant files / documents should be transferred logically into Content Manager (CM). The information should be grouped clearly and logically for subsequent staff members to access for historical reference. Check that file names are in line with preferred procedures (see Office Procedures – filing). All non-relevant documents or duplicates should be deleted from the N: drive.

4 Complaints related to ANO staff or complaint handling processes.

The ANO has a three-tier complaint system, in line with *AS/NZS 10002:2022 - Guidelines for complaint management in organisations*. Complainants are not required to request an ANO internal review (Tier 2), prior to progressing to the Commonwealth Ombudsman (Tier 3). Please note that once a review has been conducted by the Commonwealth Ombudsman, the complainant is unable to request an internal review of the same matter by the ANO.



5 Complaint protocols

5.1 Group complaints and individual complaints

People have the right to raise a complaint as individuals or as a group. This frequently includes couples and families, although it may also extend to community and other groups. Some complainants may also have two different individual records, one for their personal complaints and another for complaints raised on behalf of a group.

In the above examples, each version of the individual will have a separate client/complainant record. If a generic “family” or “and others” is included in a complainants sign off – only include named individuals in the complainant record creation. It is also good housekeeping to include a note in all applicable client records, cross-referencing the different complainant records.

At times complainants who are in a relationship or part of a household, family, or other group, may wish to combine their complaint and be considered as one entity for a review. For this to occur, all members of the group must confirm that they give permission (sample letter below) for their complaints to be combined and considered as one for the purpose of a review. All permissions received should be recorded in ANOCS to reflect the group names. It can also be helpful to confirm which email address (or addresses) is/are preferred for communication with the ANO. This should also be updated in ANOCS. A sample permission request is provided below. This should be sent to the complainant from whom permission is being sought, with the original complainant CC'd.

Sample Permission letter:

Dear xxxx xxxxx

As I anticipate you are aware, the ANO has received a complaint from your wife, in relation to Airservices Australia’s (Airservices) handling of complaints made by you and herself.

For you to be included as a joint complainant with xxxx xxxxx for case ANOxxxx, I am seeking your agreement in this regard. If so, I will request all correspondence between yourself and Airservices as part of the joint review. If you have any additional concerns, you would like raised as part of this review could you please provide the specific details by return email.

Regards

5.2 Anonymous complainants and pseudonyms

In accordance with the Australian Privacy Principles, people may be anonymous or use pseudonyms when interacting with the ANO office. The ANO Charter explicitly identifies that anonymous complaints can be accepted, but that this may limit the office’s ability to investigate a complaint.

A pseudonym is where the complainant has shared a piece of information, which in principle could lead to the person to being identified. The ANO office does not seek to identify the individual using this information, but it is important to note that if the individual provides an email or a phone number, for example, they are not anonymous and could in theory be identified. For example, should someone use the same email address under their own name and for their pseudonym, this would identify them. If a pseudonym is used by the complainant with both the Agency and the ANO office, the ANO will be able to investigate any concerns raised.

An anonymous complaint is where the person provides limited, or no information, and the information provided could not be used to identify them, such as a first name and suburb, or only the state they are calling from.

In some cases, the complainant may only be seeking anonymity from the Agency i.e., “don’t tell them I complained to you”. In such cases, if the concern is about targeting for example, the ANO office can investigate this while not providing the complainants exact details to the Agency. It would be important to note that the ANO office cannot guarantee anonymity in a case where a complainant is the only individual raising a complaint about a specific airport or issue. Any requests by the ANO office to an agency would need to be framed to reduce the risk of identification *i.e., asking for all departures for an airport, rather than just one runway, in one direction.*

Individuals have a right to raise a complaint to the ANO office anonymously or under a pseudonym. In both cases the ANO will record and report on the complaint, though this may restrict the ANO office’s ability to review or respond to their concern. If in a call with a complainant seeking to be anonymous or use a pseudonym, it is important to confirm that they do not have to identify themselves, but to review a complaint handled by an agency, the ANO office would need their details and their permission to share that information with the agency, to request the complaint records.

Please see the *ANOCs Manual* for guidance on recording correspondence made by anonymous complaints, or complainants using pseudonyms, or locating an existing “matching” client record.

5.3 Accessibility

Our complaint system must be accessible to everyone, including persons who may require assistance. The Standard ISO 10002:201 provides guidance on this. Support should be provided to people to make a complaint if needed. A person or organisation can request that another person or organization assist or represent them to make and progress their complaint.[†] Complainants who require assistance may also speak to the ANO office using a free interpreter service, by phoning the Australian Government translating and interpreting service on 131 450 to arrange a translator.

The ANO office also endeavours to communicate with complainants through their preferred contact methods. For instance, if the ANO office conducts a review on behalf of someone who does not use email, then an outcome would be provided via either post or telephone. The ANO website and all ANO public reporting is designed to meet accessibility standards in line with Australian federal government requirements.

5.4 Arranging Translation on a Complainant’s Behalf

The Australian government’s translating service is Translating and Interpreting Services National (TIS National). If a complainant calls the ANO office and requests that the ANO arrange a translator service on their behalf, the staff member should confirm with the complainant if they will be free for at least the next half hour as it takes around 15 minutes for a translator and call coordinator to be arrange. If not, a follow-up time should be scheduled with the complainant. A staff member’s capacity to do this may be influenced by the complainant’s comprehension of the information. Once this occurs, the current call should be ended.

The ANO staff member should proceed to call TIS National on 131 450. A series of prompts will be provided by an automated voice call service. The staff member will be asked to advise the language which translating is required for, and will need to navigate through a further series of prompts. After

[†] This accords with Section 5.1.4 of Standard ISO 10002:201

doing so, the staff member will be asked to provide the ANO’s client code which is [REDACTED]. The staff member will then need to confirm what organisation they are from; provide their name and phone number; and provide the complainant’s name and phone number, to a call coordinator, as well as the complainant’s case number (if applicable). They will provide a job number, add a translator to the call, and then call the complainant.

TIS account information

TIS National client code	[REDACTED]
Name of organisation	[REDACTED]
Name of team/section (if any)	[REDACTED]
ATIS account number	[REDACTED]
ATIS access number	[REDACTED]

Record keeping for TIS services used

The ANO staff member must make a record of TIS usage, which includes the complainant, date and time as well as ANO complaint number. This can be recorded as a text file which is saved in Content Manager under the Office Management folder for the calendar year, in a divider "TIS usage yyyy". If TIS hasn’t been used in the current year, please create a divider under the relevant Office Management folder.

6 Key Performance Indicators

In July 2021 a Key Performance Indicators (KPIs) system was introduced as a reportable metric.

6.1 Single Complaints KPI

Complaints not part of multiple complaints investigations
Acknowledgement of complaint within 2 business days
Decision on whether complaint is within jurisdiction within 14 days
Updates every 28 days*
Close by 3 months (benchmark 25%)
Close by 6 months (benchmark 50%)
Close by 12 months (benchmark 25%)
Close later than 12 months (benchmark 0%)

*Between July 2021 and March 2023, the KPIs in ANOCS was automated to calculate 21 days, so a manual Follow-up was recorded a week after the actual date of the update provided.

The 2-day acknowledgement (any contact or attempted contact by ANO to complainant qualifies) is relatively easy in the case of ANO website submission forms and emails due to their automated responses. In the case of telephone calls – any attempt to make contact is logged as acknowledged. If no subsequent contact can be made, after a reasonable number of attempts the case is placed to outcome status for a 14-day period then if no further contact is made, it is closed back to the most recent contact or attempted contact date.

When a decision is made to review/ investigate a case, this becomes the ‘decision date’ and the status is moved to accepted. If a staff member is not available to accept the case, it is assigned to ‘awaiting assignment’. The next staff member who has availability should select the oldest case available unless the office manager advises otherwise.

If the decision is to refer to Airservices, Defence or another agency – then this becomes the decision made date for that case.

Once an ANO review has been completed and the outcome forwarded to the complainant, a copy of the outcome should be added to ANOCS under Case > Notes and the Status updated to Outcome.

A copy of the Outcome is to be forwarded to the NCIS or Defence with a summary of any ANO recommendations.

It is important to monitor due date of updates. ANOCS provides guidance for this with its ‘next follow up’ date. This information can also be obtained through the reporting tab – Open Cases.

Follow-up due dates must be carefully monitored as this is a reportable follow-up KPI.

When cases are closed, they are backdated to the outcome sent date unless there is ongoing relevant communication about the outcome in which case it backdates to the last relevant communication date.

6.2 Multi Complaints KPI

The process is similar to the single complaint KPI, with slightly different KPIs for acknowledgement and decision made.

Complaints that are part of multiple complaints investigations
Acknowledgement of complaint within 3 business days
Decision on whether complaint is within jurisdiction within 21 days
Updates every 28 days
Close by 6 months (benchmark 50%)
Close by 12 months (benchmark 50%)
Close later than 12 months (benchmark 0%)

7 Managing difficult complainants

7.1 Unreasonable Complainant Conduct

The AS/NZS 10002:2022 – Guidelines for complaint management in organisations (E2), provide examples of ‘Unreasonable Complainant Conduct’. It is important to understand that the ‘unreasonable conduct’ applies to the behaviour not to the person themselves. Just because a complainant may exhibit unreasonable behaviour on one or more occasions, they should not be viewed as an ‘unreasonable person’. It is important to always be fair and reasonable when interacting with them.

Examples of unreasonable complainant conduct may include:

- Unreasonable persistence (e.g., making excessive complaints on an identical issue or refusing to accept decisions)
- Unreasonable demands (e.g., demanding more reviews, demanding a different outcome)
- Unreasonable lack of cooperation (failing or refusing to identify the issue of complaint)
- Unreasonable arguments (including irrational claims/beliefs/conspiracy)
- Unreasonable behaviour (threats, abusive language etc)
- Aggressive or abusive complainants (may, but does not necessarily, include threats of harm or refusal to accept decisions).

The standard sets out a number of strategies including to:

- Manage expectations from the start (providing clear information about the role, responsibilities, and limitations of the ANO).
- Recognise and respond to cultural differences (cultural differences may inform communication styles. Complainants should be informed of the ANO’s policies, procedures, and mechanisms).
- Insist on respect and cooperation (complainants at times may need to be advised of the ANO office’s expectations for respectful behaviour).
- Exercise ownership and control over complaints.
- Communicate Effectively (complainants should be provided with clear, timely, culturally and personally appropriate communication. This includes providing regular updates about the status of their ANO case).
- Be flexible with modes of communication (for instance, if a complainant’s behaviour includes verbal abuse, it may be requested that further communication is in written form).

For further information on the behavioural expectations of ANO staff when dealing with complaints, please see the *ANO Investigative Guidelines: ANO Staff Investigative Principles and Conduct*.

7.2 Responding to distressed complainants

If the complainant threatens self-harm – see Section 7.6

For complainants who are ‘distressed’ but not threatening self-harm, the distress may be a result of:

Stress	Change	Physical risk
Mental illness	Traumatic events	

Depending on the form of communication (telephone, email, submission form etc) the response will vary a little. The most challenging situation is with a telephone caller, as your opportunity to craft a careful response is reduced. However, in all cases, remain mindful that we are neither counsellor nor therapist, so need to respond with a measured balance of careful listening /empathy but armed with a clear understanding of ANO policy and a plan of what information we can/ need to provide.

The SOCAP information booklet “*De-Escalating the Agitated Caller June 2021*”[‡] stresses that safety is always the priority. The safety of your caller, your organisation, your team, and yourself. Never allow another person to violate your personal boundaries.

Once the complainant’s issue/s are understood (take notes), take control of the interaction, and when you consider the timing is suitable, consider giving a general overview of how the ‘system’ works (i.e., in the first instance complain to NCIS / Defence, ANO role etc).

If managing a distressed telephone caller discuss which medium of communication is going to be the most beneficial for the complainant (often email is useful, and a large amount of information can be provided for future reference). Email provides the added advantage of a hard copy of factual interactions.

For written responses, the ANO has several drafts to cover many scenarios.

7.3 Threats of self-harm by complainants

Any threats of self-harm must be treated as a serious threat and be escalated immediately for further assessment. Where a threat of self-harm is received, the steps will vary depending on the communication method *i.e., in conversation, a voicemail or in writing (including email or via post)*.

It is possible that a staff member may be working when no other staff are available, and a caller is advising they are intending to self-harm. To manage this situation, the ANO office has divided this section into two sections.

SELF HARM – PROBABLE (applicable to in the moment telephone calls) or

SELF HARM- POSSIBLE (written correspondence or suggested in passing during a telephone call.

A standalone copy of SELF-HARM PROBABLE is [available here](#). Section 7.3.3. is applicable.

The remainder of this section refers to SELF-HARM – POSSIBLE.

[‡] Accidental Counsellor Training provided through Society of Consumer Affairs Professionals by Accidental Counsellor Pty Ltd 2021.

7.3.1 By phone

Alert a colleague immediately about the situation, so you can gain support from a senior staff member as needed. If working outside of the office, a message via Teams can be fastest way.

Take as detailed notes as possible and ask the individual where they are if you can.

Offer to provide the Lifeline number **13 11 14** and/or encourage them to reach out to family, their GP, or a friend they trust.

Once the call ends, provide details (verbal) and a short-written summary of the call as it related to the self-harm threat, to the senior staff member. Please do this at the end of the call.

The senior staff member will escalate to Airservices' Security team for a Risk Assessment, as per **7.3.3 Referral to Airservices Security – by senior staff**.

After the call has been referred to a senior staff member, prior to recommencing your duties, it is important to step away and have a short break to process and collect yourself. If you feel the need to go for a walk outside the office, please ensure you advise a colleague prior to leaving.

Once the senior staff member has referred the matter to Security, they will check-in with you.

After difficult calls, it is common to second guess if you handled the call correctly or in the best way. Your direct manager will make a time with you, a few days later so you can talk about how you feel you handled the call and identify any development areas, etc to support you, for future difficult calls.

The call needs to be logged in ANOCs in full (as per normal) – this is in addition to the short summary provided for Security to assess. You do not need to log the full call immediately, but it is recommended to do the same day or early the next day at the latest.

7.3.2 Through email, post, or voicemail

Immediately contact a senior staff member (generally Unit Manager) to review the correspondence.

The senior staff member will determine if the correspondence should be escalated to Airservices' Security team for a Risk Assessment, as per **7.3.3 Referral to Airservices Security – by senior staff**.

7.3.3 Referral to Airservices Security – by senior staff

If an individual explicitly threatens to kill or injure themselves, this must be referred to Security for assessment. Please follow the procedure below.

Concerns without a clear threat

Where there are identified concerns for an individual's wellbeing regardless of whether threats are made, these should be referred to senior staff for further assessment in the first instance. Indicators of concern may include where an existing complainant's communication has changed significantly.

Evaluation by two staff is recommended, if possible, where there is no explicit threat made.

For written complaints, if appropriate, a senior staff member can call the complainant to clarify their complaint, as part of standard complaint handling process. Through this communication, it may be possible to gain further information to support the evaluation about whether there are self-harm risks.

This is not a welfare check and concerns of self-harm, etc should not be raised by the ANO staff member during the call.

If the two-person evaluation determines there is a reasonable suspicion of self-harm, this should be referred to Security using the below procedure.

Note: Please refer to Section 7.2 regarding advice on managing distressed individuals. A number of support options that can be offered to these individuals are listed under Section 3.3.

If a referral to Airservices Security is required, go to [Horizons](#) to identify staff from the Security Risk team.

Identify a staff member in the Security Risk team who is available via Teams and call them to advise situation and that a referral needs to be made. Request confirmation of the best email address to send information to, for prompt attention.

If no-one in the Security Risk team is available, contact any available member of the Security team.

Forward the correspondence details (summary of call or forward the email) including providing the individuals home address, to the email address advised by Security.

Complete the [Security Incidents Report form](#), including attaching the correspondence of concern.

A copy of the Security Incidents Report form will be emailed back to you. Once received, make sure to file this in ANOCs under the Client record.

7.4 Bomb threats or threats to others

Airservices' [Bomb Threat and Suspicious Items Guide \(C-GUIDE0161\)](#) is available in the Document Centre and should be utilised if any threats are received by phone, email or post.

Immediate actions if you receive a bomb threat by phone:

- Stay calm.
- Keep the caller talking and try to get details to fill out as much of the [Bomb Threat Checklist](#) as you can (there should a printed copy on your desk).
- Gain the attention of a colleague/supervisor immediately, if you can.
- When the caller disconnects – leave the phone off the hook. **DO NOT HANG UP!**

7.5 Employee Assistance and Support

The Employee Assistance Program is a free and confidential service available at any time, if you need support or someone to talk confidentially to:

1300 our EAP (1300 687 327)

For more information, please visit the [Horizons EAP page](#)