

# **Noise Complaints and Information Service (NCIS) - Managing Aircraft Noise Complaints and Enquiries**

## **Procedure**

**C-PROC0336**

**Version 6**

**Effective 22 December 2023**

Endorsed: NCIS Manager

Approved: Donna Marshall  
Head of Community Engagement

## Change summary

Version	Date	Change description
6	22 December 2023	<ul style="list-style-type: none"><li>• Various updates and restructuring of document content to reflect recent process improvements including greater integration of Community Engagement interface</li><li>• Removed content more appropriate for NCIS training manual</li><li>• No change bars applied due to the extent of the changes</li></ul>

This document was created using Generic Document Template C-TEMP0047 Version 9.

## Table of contents

<b>1</b>	<b>Purpose</b> .....	<b>4</b>
<b>2</b>	<b>Overview</b> .....	<b>4</b>
2.1	Complaint Management System .....	4
2.2	Alignment .....	4
<b>3</b>	<b>The Complaint Process</b> .....	<b>5</b>
3.1	Intake .....	5
3.2	Analysis of contacts .....	9
3.3	Response .....	100
<b>4</b>	<b>Investigations</b> .....	<b>122</b>
4.1	Investigations .....	122
4.2	Complex investigations .....	122
4.3	Noise improvement investigations .....	122
4.4	Investigations into actions or decisions taken by Airservices .....	133
4.5	Investigations into complaints about staff members .....	133
4.6	Community Engagement complaints .....	13
<b>5</b>	<b>Managing unreasonable conduct</b> .....	<b>144</b>
5.1	Unreasonable persistence .....	144
5.2	Management plans.....	155
<b>6</b>	<b>Documenting actions or decisions</b> .....	<b>16</b>
6.1	Escalation and review requests .....	16
6.2	Managing high volume .....	17
<b>7</b>	<b>Aircraft Noise Ombudsman (ANO)</b> .....	<b>18</b>
7.1	Acceptance of direct referrals from ANO .....	18
7.2	Management of ANO requests for NCMS data .....	18
7.3	Review of transcripts and recordings by the ANO .....	19
<b>8</b>	<b>Other</b> .....	<b>20</b>
8.1	Privacy .....	20
8.2	Analysis, evaluation and reporting of contacts .....	20
8.3	Monitoring of the complaint management system .....	20
8.4	Continuous improvement .....	20
8.5	Voice recordings and transcripts.....	21
<b>9</b>	<b>Definitions</b> .....	<b>22</b>
<b>10</b>	<b>References</b> .....	<b>22</b>

# 1 Purpose

This document describes the procedures for the Noise Complaints and Investigation Service (NCIS) in responding to complainants and their aircraft noise complaints about aircraft operations, including flight path changes.

## 2 Overview

### 2.1 Complaint Management System

The Airservices Complaint Management System consists of the policies, procedures, practices, staff, hardware and software used by the NCIS in the management of complaints. The purpose of the Complaint Management System is to:

- enable NCIS to respond to relevant issues in a timely and cost-effective way
- provide reporting and information on relevant issues
- provide public reporting regarding summaries of complainants and relevant issues
- identify opportunities for aircraft noise improvements
- identify the need for educational information to improve community understanding of relevant issues.

This Complaint Management System is for individuals. It does not cater for petitions or representative complaints.

### 2.2 Alignment

The procedures in this document are aligned to the:

- Commonwealth Ombudsman's [Better Practice Guide to Complaint Handling](#)
- NSW Ombudsman's [Managing Unreasonable Complainant Conduct Practice Manual](#).

When responding to contacts, staff should also act in accordance with any other internal documents providing guidance on the management of contacts.

## 3 The Complaint Process

### 3.1 Intake

Our system is set up to receive submissions from individuals.

Generally, we require a complaint to be made by the complainants personally, in their own words.

However, complaints will be accepted from third parties if they are made on behalf of complainants who:

- have a disability or infirmity
- are aged or under-aged
- require an interpreter, and/or
- have literacy or other accessibility issues.

Where submissions are in writing and signed with the names of more than one person we may:

- create a complainant profile for the first named person, or
- if one party already has a profile in the database, process the submission under that name.

A petition or any other form of representative complaint will be processed under the name of the person who submitted it and it will be treated as an individual complaint from that person.

#### 3.1.1 Submission

Contacts may be submitted to the NCIS using:

- the online [Noise Complaints and Information Service Contact Form](#)
- [WebTrak](#)
- telephone
- letter.

Incoming contacts will be assessed by a Complaint Specialist who will determine:

- whether it raises a new, relevant issue
- whether a response is required, and
- if so, who it should be assigned to.

#### 3.1.2 Case creation

We will create a case for each primary relevant issue raised by a complainant. The contact is recorded in the case, along with any subsequent contacts on the same relevant issue.

#### 3.1.3 Online and WebTrak submissions

Contacts lodged via the online form will receive an immediate on-screen acknowledgement of receipt. An automatic email acknowledgement will also be sent to the nominated email address.

Both acknowledgements explain the next steps in the process, timeframes, and include a copy of the complainant's submitted comment. Complainants are also advised to retain a copy as copies will not be issued separately.

### 3.1.4 Phone submissions

#### 3.1.4.1 New contacts

A complainant has the option of contacting us by telephone. For new phone contacts we will ask questions that allow us to make a clear and comprehensive record of the relevant issues we need to respond to.

Due to the complexity of some aviation issues, we may ask the complainant to put those concerns in writing to ensure clarity and comprehensiveness and/or to enable us to refer the matter.

We will advise the complainant that our preference is to respond to their relevant issues in writing. In order to respond in writing we will require an email or postal address. If a complainant declines to provide an email or postal address, we will explain that we are able to provide greater detail and clarity by responding in writing and that we are limited in the response we can provide if a call back from one of our Complaint Specialists is requested. For example, a written response can include images to support the explanation.

**Note:** If a written response is not appropriate for the complainant, for example for accessibility or language reasons, we will work with the complainant to identify the most appropriate means of communication.

Prior to the completion of the call, we will:

- clarify the relevant issues to be answered
- record the information and contact details into our database
- state the expected timeframes

#### 3.1.4.2 Escalation of calls

All complainants may have a telephone call escalated to a more senior team member.

If a complainant has had a call escalated once, and on a subsequent call asks for escalation again, a senior team member will review their request and determine whether this is warranted, having regard to the circumstances and the need to allocate resources fairly. The reasons for the decision will be documented on the complainant's case.

#### 3.1.4.3 No transfer of calls

We will not "warm transfer" calls internally.

If a complainant requests to speak to a more senior team member, we will firstly attempt to assist and answer any matters without having to involve a senior team member. If we are not able to assist and the request is necessary, we will advise the complainant that they will be called back, giving a timeframe wherever possible.

This is to allow time to properly prepare for the call, including reading the history of the case, so that the complainant does not need to repeat themselves.

#### **3.1.4.4 Insults or abuse**

If a caller is insulting or abusive, (including racist, sexist and homophobic abuse) we will warn them that the behaviour is unacceptable and that if it continues we will terminate the call.

If the behaviour continues, we will immediately and politely terminate the call. We will document the termination in the record of the conversation and advise the Senior Complaint Specialist of the occurrence.

Where a caller remains anonymous and repeatedly calls to insult or abuse a staff member, and then hangs up the call, management will consider terminating all calls to protect staff. The duration will be determined on a case-by-case basis.

#### **3.1.4.5 Unproductive calls**

A call is deemed to be unproductive where a complainant repeatedly:

- continues to ask the same question or make the same point, despite being advised we will provide an answer or explanation or having been advised a previous response answers the question or point
- refuses to listen to an explanation, or interrupts, disagrees with or argues about an explanation
- prolongs the conversation when the call is being brought to a close
- will not let the NCIS staff member speak
- raises matters outside Airservices remit or unrelated to aircraft noise.

When a call has become unproductive, we will advise the complainant of this, the reasons why, and that if we cannot progress further we will have to terminate the call. If the call continues to be unproductive, we will politely terminate the call.

We will document the termination of the conversation and advise a Senior Complaint Specialist of the occurrence so it can be documented in the database.

#### **3.1.4.6 Recording of call by complainants**

If a complainant tells us they are recording the call, we will advise them that:

- under our procedures we are not required to continue the call
- they can still communicate with us via our online form or post
- if they refuse to end the recording, we will politely terminate the call.

#### **3.1.4.7 Review of terminated calls**

A Senior Complaint Specialist or other senior NCIS team members may review the recording of terminated calls for quality and training purposes.

When reviewing, a file note in the database will be created by the reviewer containing the findings of the review. This will be saved on the complainant's case.

If the review finds that the caller's behaviour was inappropriate, a senior team member will write to the caller describing the inappropriate behaviour. The letter may warn of the consequences of further such behaviour, or where warranted, it may impose immediate sanctions on the caller.

Consequences may include placement on a management plan, restrictions or exclusions from contacting the NCIS by phone, or other sanctions considered appropriate in the circumstances of the case.

If the review finds that a call was improperly terminated, the occurrence will be escalated to the NCIS Manager for decisions on appropriate action.

Appropriate action may include measures such as a training plan and the provision of apologies to the complainant.

#### **3.1.4.8 Security threats**

Examples of security threats include:

- threats to aircraft
- threats to airports
- threats to Airservices personnel
- bomb threats.

If a caller makes a bomb threat, keep the caller on the phone and complete a Bomb Threat Checklist.

For all threats, including bomb threats, follow the *NCIS Security Incident Guidelines*.

#### **3.1.4.9 Threats of self-harm or suicide**

If a caller says something that indicates they may be thinking of harming themselves, you may provide the contact details for 24-hour telephone support services, including:

- Lifeline 24 hr Counselling Service: **13 11 14**
- Beyond Blue: **1300 224 636**
- Suicide Call Back Service: **1300 659 467**

You should consider getting help from colleagues to manage people who pose a risk of harm to themselves or someone else. This could include signalling to another person to alert them to the nature of the call or interaction and that assistance is required.

We will document the conversation and advise a Senior Complaint Specialist of the occurrence so it can be documented in our database. The senior team member will notify Security so that police in the relevant area can be contacted.

For all self-harm or suicide threats, follow the *NCIS Security Incident Guidelines*.

### **3.1.5 Letter submissions**

Letters can be sent by post to the NCIS. Our postal address is:

**Noise Complaints and Information Service**

**PO Box 211**

**Mascot NSW 1460**

Letters received by the NCIS through the NCIS postal address will be processed by a Complaint Specialist. The letter will be scanned and the electronic copy attached to a file in the complaints management database.



## **3.2 Analysis of contacts**

### **3.2.1 Initial assessment of contact**

A Complaint Specialist will make an initial assessment of the contact to identify the primary relevant issue being raised.

If this is a new relevant issue, it will be considered a new contact, and a new case will be created for that relevant issue.

If the complainant already has a case on that relevant issue, the submission will not be considered to be a new contact, and it will be added to the existing case.

#### **3.2.1.1 Is a response required?**

The Complaint Specialist will then make an assessment of whether or not the contact requires a response.

A complainant who has provided contact details and raises a new relevant issue will receive a response.

If the submission lacks detail, (for example, "Loud noise"), the response may be restricted to a general response or asking the complainant for additional information.

Submissions consisting of comments or feedback will not be responded to by NCIS if the comment or feedback relates to an open engagement activity.

In these cases, the NCIS will send the complainant an acknowledgement email advising the comment or feedback has been provided to Community Engagement for consideration and response, as appropriate.

Decisions about whether to respond or not will be clearly documented within the complainant's record either on the complainant's profile or within the complainant's relevant case.

### **3.2.2 Repeat contacts**

If a complainant's contact raises a matter currently open for response, and where the further contacts don't raise a new issue, we will inform the complainant we do not require further information at this time and ask them not continue to contact us until we have responded.

If we have already provided this advice and there is no new issue or question raised, we will not respond, however the matter will be brought to the attention of the Senior Complaints Specialist who will review that procedure has been correctly applied and to determine how to manage these future contacts. In these cases, we will advise the complainant that as we have already provided information on the issue and there is no further information we can provide, that we will not provide any further responses on this issue.

### **3.2.3 Anonymous contacts**

Complainants may choose to remain anonymous, however we will be unable to respond to their contact.

We encourage all complainants to provide their full contact details. This is to ensure we have all the information needed to properly investigate and respond to the complaint. Complainants may wish to provide pseudonyms.

### 3.2.4 Assignment of cases

Most cases will be handled by the Complaint Specialists.

Cases will be assigned to senior team members according to the following table. The senior team member may either refer it elsewhere in Airservices, respond to it personally, or advise the Complaint Specialist how to respond.

Type of case	Assign to
The Complaint Specialist is unsure whether the issue is one for NCIS	Senior Complaints Specialist or Manager
Enquiries from members of Parliament or their offices, local government	Senior Complaints Specialist or Manager who will refer to Government Relations
Enquiries from the media	Senior Complaints Specialist or Manager who will refer to the Media Officer
A complainant exhibiting unreasonable behaviour	Senior Complaints Specialist or Manager
If investigation involving internal and/or external liaison is required, or if an investigation of a more complex, technical nature is required – see Section 4 Investigations.	Consult Senior Complaints Specialist or Investigator
Complainants who have been advised that we will respond to new issues only – if a new issue has been raised or if not sure	Senior Complaints Specialist
If an escalation or review is requested – see Section 6.1 Escalation and Review	Senior Complaints Specialist or Manager

## 3.3 Response

Contacts are dealt with on a case-by-case basis and actions taken in relation to each will differ according to specific circumstances.

Due to the complexity of aviation operations, the preferred method of response to contacts is in writing.

In deciding how to respond, we will take into account the need to allocate our resources fairly across all the contacts we receive. Therefore, we may:

- provide information or an explanation
- investigate the matter
- decline to investigate or further investigate the matter
- ask for further information or clarification
- request the complainant to reframe the contact into a clear statement of the relevant issues being raised and the outcome being sought.

In responding to contacts, we may advise the complainant making the contact of:

- relevant information and explanations, including imagery
- whether any noise improvement opportunities have been identified
- any action we took or propose to take, or why no actions can be taken
- the solution that we have proposed or put in place, or why no solution can be identified
- the reason for any decisions made.

### **3.3.1 Timeframe for response**

If a response is required, the target timeframe for response is 21 days. If we are receiving a high volume of contacts and a response is not able to be provided within 21 days, we will provide advice of the delay on our NCIS webpage, contact form and auto acknowledgement emails.

We will provide the response at the earliest opportunity following that 21 day period.

If the complexity of the enquiry requires detailed investigation or if other matters are preventing the completion of the response, we will endeavour to keep the complainant updated with the progress of their complaint response.

### **3.3.2 Aviation-related matters outside Airservices remit**

When reviewing a contact, if we determine the contact is within the remit of the Civil Aviation Safety Authority (CASA) or the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department), we will refer the complainant to the relevant organisation, or with the complainant's permission we will seek agreement from that organisation to transfer the matter to them.

Examples of issues within the remit of other federal agencies include safety (CASA), curfew, drones (the Department) and military (the Department of Defence).

If a contact is about an issue that is outside the remit of Airservices and other federal agencies with aviation responsibilities, we will provide information where possible and explain where responsibility lies. Examples of such issues include odours, emissions and health issues.

If a contact is about ground running at airports or another environmental issue within the responsibility of airports, we will refer the complainant to the airport or airport operator or seek to transfer the complainant to that organisation with the permission of the complainant.

### **3.3.3 Emergency services**

We are unable to provide any information to the public about ambulance, rescue, police air wing or covert activities, including track displays that show flight numbers or other means of identifying these movements. We will refer to these movements as "emergency services".

## 4 Investigations

### 4.1 Investigations

Aircraft noise investigations will be conducted by the Complaint Specialists. These investigations will consist of searches and queries using tools and documents such as:

- ANOMS
- WebTrak
- Airservices reports
- [Aeronautical Information Package \(AIP\)](#), e.g. Departure and Approach Procedures (DAP), En Route Supplement Australia (ERSA), and Visual Terminal Charts (VTC).

### 4.2 Complex investigations

Complex investigations will be conducted by the Investigations team and/or senior team members. Complex investigations may include those that require:

- liaison with other areas of Airservices
- external liaison including with other agencies, aviation operators, airports, airport operators
- complex matters raised
- analysis of the potential for change in flight paths or other procedures.

The manner in which a complex investigation is conducted will be informed by the specific circumstances of the case and the need to allocate our resources fairly.

At the conclusion of the investigation, the complainant will be advised of the outcome in writing.

### 4.3 Noise improvement investigations

An initial noise improvement investigation may be conducted for reasons including:

- to progress findings of a complex investigation
- after a complaint trend analysis has indicated a potential opportunity for improvement
- at the suggestion of a complainant or the Aircraft Noise Ombudsman (ANO).

Noise improvement investigations will be conducted by the Investigations team and/or senior team members.

In investigating potential noise improvements, consideration will be given to:

- safety
- air traffic management efficiency
- whether a better noise outcome can be achieved overall.

Proposals that compromise safety will not be progressed.

Moving noise from one part of the community to another generally will not be considered a better noise outcome overall.

Internal and external consultation will occur as required, for example, with air traffic control, operators, airports and airport operators.

If the investigation finds that the proposal is feasible, it will then be progressed through to Community Engagement for further analysis.

## **4.4 Investigations into actions or decisions taken by Airservices**

The investigation of actions or decisions taken by Airservices in relation to flight path change processes, including community engagement, environmental assessment and flight path design processes, or the release of related information, is not within the remit of the NCIS. Enquiries of this nature are forwarded to the relevant area of Airservices, recorded and tracked in the NCIS database.

## **4.5 Investigations into complaints about staff members**

The investigation of complaints about Airservices staff members is outside the remit of the NCIS.

### **4.5.1 NCIS and Community Engagement staff members**

Complaints about individual NCIS or Community Engagement staff members must be made in writing to the relevant manager, clearly setting out the nature of the complaint.

For complaints about NCIS or Community Engagement staff, the relevant manager is the Head of Community Engagement. If the complaint is about the Head of Community Engagement, the relevant manager is the relevant Executive Officer.

If the grounds for the complaint are unclear, the relevant manager may request clarification from the complainant or may decline to proceed with the complaint. The reasons for this decision will be provided to the complainant in writing.

If the complaint proceeds, the relevant manager will investigate the allegations and respond in writing to the complainant.

### **4.5.2 Other staff members**

Complaints about staff members outside of the NCIS and Community Engagement will be referred to the relevant manager who will decide whether the matter requires investigation and if so, how to proceed.

## **4.6 Community Engagement Complaints**

Complaints received by the NCIS in relation to Community Engagement will be forwarded to the Community Engagement team for review and action as appropriate. The complaint will be recorded in the NCIS database noting it has been forwarded to Community Engagement. The NCIS will send the complainant an acknowledgement email advising the complaint has been provided to Community Engagement for consideration and response, as appropriate.

## 5 Managing unreasonable conduct

We are committed to being accessible and responsive to all people who contact us. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our staff
- our ability to allocate our resources fairly across all the contacts we receive.

At times complainant's may exhibit behaviour that is considered unreasonable. This may include persistent contact, abusive or threatening language, demanding outcomes that are not reasonable, and threatening harm to themselves or others.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take action to manage any conduct that negatively and unreasonably affecting our people and will support our staff to do the same in accordance with these procedures. We do this in line with the Commonwealth and NSW Ombudsman guide to managing unreasonable conduct by a complainant. Unreasonable conduct may include:

- unreasonable persistence
- unreasonable demands
- unreasonable lack of cooperation
- unreasonable arguments
- unreasonable behaviours

### 5.1 Unreasonable Persistence

Unreasonable persistence most commonly involves a complainant continuing to raise the same issue. If not managed, this type of behaviour can lead to using a disproportionate amount of time and resources addressing this persistence, impacting on the resources available for other work, and inadvertently dealing with the same matter multiple times.

We will inform individuals who contact us repetitively in a short period of time that we do not require multiple contacts about the same matter.

Where this continues to occur after giving the above advice, we may process these contacts into our database in bulk without reading them individually.

If a complainant has already received one or more responses from us, a senior complaint specialist will review the correspondence and may write to the complainant to:

- explain that they need not lodge more than one contact in order to have their matter taken seriously and a response provided.
- explain that decisions to investigate noise improvements are based on the number of complainants raising the same issue, not the same issue being raised multiple times by a single complainant.
- advise that we may place them on a management plan if they continue to lodge multiple contacts about the same issue.

## 5.2 Management plans

A management plan may assist us to limit and actively manage unreasonable conduct on the part of the complainant. A management plan may be used for complainants who are displaying unreasonable conduct in accordance with Section 5.0 Managing unreasonable conduct and 5.1 Unreasonable Persistence.

A management plan to manage unreasonable conduct may include:

- only responding to new relevant issues not previously responded to, or questions not previously answered in earlier responses.
- placing restrictions on contacting us by phone including time limits on calls, specified times when calls will be accepted, or not allowing contact via phone in extreme cases.
- placing restrictions on the volume of online contacts, including only reading the first contact submitted in the month and recording any others into the existing case.
- other measures considered appropriate by the NCIS Manager having regard to the specific circumstances.

The decision to approve and implement a management plan will be made by the Senior Complaints Specialist and NCIS Manager. The complainant will be notified of the decision. We will review each management plan on an ongoing basis.

## 6 Documenting actions or decisions

We will document in the Noise Complaints Management System (NCMS) database all steps taken to respond to contacts including:

- all interactions with complainants
- any investigations conducted
- any decisions made
- all correspondence.

When documenting phone conversations, we will add as much detail as needed to enable anyone reading the account to understand what the complainant raised, what advice or information they were given and any undertakings given about providing further information, including timeframes.

### 6.1 Escalation and review requests

If a complainant is dissatisfied with the way their contact was handled, they may ask for their contact to be escalated for review. NCIS team members may also initiate a review.

Internal reviews of how a contact was managed will be conducted by a person other than the original complaint handler.

Initially this will be conducted by peer review by another Complaints Specialist or the Senior Complaints Specialist. Reviews may also be conducted by the Investigator or the NCIS Manager, as appropriate.

A review may consist of:

- reviewing contacts, conversations, notes, correspondence, decisions and outcomes
- conducting further investigations and/or seeking further advice
- identifying aspects that could have been handled differently
- identifying training needs.

Which actions we decide to take, and who the review is assigned to, will be tailored to each case and will take into account the need to allocate our resources fairly across all the contacts we receive.

If a complainant initiated the review, we will provide the complainant with the outcome of the review in writing.

After a matter has been reviewed once, if a complainant requests further review we will ask the complainant to submit in writing their reasons for requesting a further review. After consideration of the reasons, we may decline to undertake a further escalation or review. If so, the complainant will be advised of this decision in writing.

If the review is escalated, it will be completed by the NCIS Manager. The complainant will be advised in writing of this action and the subsequent decision.

We will inform complainants about the external review option available from the Aircraft Noise Ombudsman.



## 6.2 Managing high volume

From time-to-time the volume of incoming submissions that require a response may exceed our ability to respond in accordance with these procedures in a timely manner.

This may occur due to one or more factors including:

- community campaigns encouraging submissions to be made
- staff vacancies pending recruitment or absences on leave
- media attention
- sustained adverse weather events
- new flight paths including new runways, new landing systems and new airports.

If this occurs, the NCIS Manager will implement a High Volume Management Plan. This may include temporary amendment of regular procedures for the purposes of increasing the volume of submissions that can be responded to while incoming submissions and/or submissions awaiting response remain high.

The plan will be in writing and may set out:

- the reasons the plan is required
- the elements of these procedures that will be amended or suspended for the duration of the plan
- the nature of any amendments to these procedures or any new measures introduced
- an initial timeframe for operation of the plan
- a provision for review of the plan at the end of this time period.

The review may result in an extension of the plan if it determines that the circumstances that required it continue to apply. The plan may be extended in its original form or amended as considered appropriate.

## 7 Aircraft Noise Ombudsman (ANO)

### 7.1 Acceptance of direct referrals from ANO

If a complainant contacts the Aircraft Noise Ombudsman (ANO) regarding a relevant issue and they have not previously contacted NCIS, the complainant should be referred to contact the NCIS directly.

Direct referrals from the ANO may be accepted only if the contact has been received in writing. If a complainant has contacted the ANO by telephone, the ANO should refer them to contact the NCIS directly.

This is to ensure that the contact received is in the complainant's own words. The NCIS will not generally accept referrals consisting of summaries or synopses of a conversation unless there are accessibility reasons for doing so.

Direct referrals from the ANO will not be accepted where the complainant has contacted the NCIS previously and we consider this would circumvent the complaint management process.

### 7.2 Management of ANO requests for NCMS data

Requests are categorised as follows:

**Standard requests** - These are typical requests for information that may include copies of complaints made to the NCIS, responses to complaints and associated material.

These requests will be handled by the NCIS and the response time should generally be within one week. There may be occasions where a request is more complex, for example, where there is an extensive history with the specific complainant with multiple complaints, notes and correspondence which may take longer to action. These would be identified in the initial search and may take one to two weeks to action with early advice to the ANO notifying of the extended timeframe.

**Other requests** - These requests for information and timeframes would be negotiated with the ANO on a case-by-case basis. For example, they may be related to a review the ANO may be undertaking where information requests could be thematic, for example, may require a range of material over a specific time period to be provided or a category of complaints.

If the ANO seeks records of complainants containing personal information where those complainants have not requested reviews from the ANO, for privacy reasons the NCIS may need to liaise with complainants to request permission to release their records (see next section).

However, this would be as a last resort if alternative means such as redacting or de-identifying personal information are unavailable.

Organisational documentation will be requested from the relevant business unit and the response prepared by them.

### 7.2.1 Management of privacy issues

The Airservices Privacy Statement ensures if a complainant requests a review of the handling of their complaint by the ANO, Airservices may provide the ANO with complainant personal information relevant to that review if requested by the ANO.

If the ANO seeks to undertake a systemic review and requests that data containing personal information be provided for complainants who have not requested a review by the ANO, Airservices will not provide personal information without permission from the relevant complainant(s). In addition, the ANO may request statistical and / or depersonalised data for the purposes of systemic reviews.

## 7.3 Review of transcripts and recordings by the ANO

Transcripts must only be prepared in response to a Request for Information from the ANO and must be accompanied by a Management Review. The Management Review must be prepared by the NCIS Manager for submission to the ANO and must include the following factors:

- 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.

All transcripts, which will be prepared by the NCIS Manager or by an external agency with appropriate privacy policies and procedures, must be de-identified. Transcripts are to be verbatim and to include appropriate nuances of the conversation, e.g. expressions of tone. The staff member on the recording may review the transcript against the voice recording to ensure that the transcript is a true and correct record of the call. If the staff member believes the transcript is incorrect, they may submit revised wording to the NCIS Manager.

Transcripts prepared in response to an ANO Request for Information will not 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 to this effect must be received from the ANO.

The ANO may listen to a recording subject to these conditions:

- Both the NCIS Manager and the Head of Community Engagement must be consulted on the request. The staff member on the recording must also be consulted.
- A copy of the recording will not be released. The recording must be listened to at an Airservices location.

## **8 Other**

### **8.1 Privacy**

Personal information that identifies individuals, including complainants and private aircraft operators or private owners, will only be disclosed or used by Airservices as permitted under the relevant privacy laws.

### **8.2 Analysis, evaluation and reporting of contacts**

We will ensure that contacts are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- the number of complainants and contacts per associated airport
- the number of complainants per suburb
- the issues raised by complainants.

Regular analysis of reports will be undertaken to monitor trends and identify emerging complaint hotspots. This information will be shared with Community Engagement for further investigation.

### **8.3 Monitoring of the complaint management system**

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and managing complaints
- identify and implement opportunities for further efficiencies in the operation of the system.

Monitoring may include the use of quality assurance audits, internal reviews and complainant and ANO feedback.

### **8.4 Continuous improvement**

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complainant data
- implement appropriate system changes arising out of our analysis of data and continual monitoring of the system.

### **8.5 Voice recordings and transcripts**

Procedures related to NCIS voice recordings apply to **all** Airservices staff.

### **8.5.1 Purpose of recording calls**

Phone calls will be recorded for security, quality assurance and training purposes. Callers will be advised of this during the introductory message. Recordings, wherever they are held, are deleted after 30 days. This does not apply to recordings of calls deemed to be a potential or actual security threat.

### **8.5.2 Release of voice recordings**

Recordings will not be provided to any agency, organisation or individual except:

- The police or relevant security agency including Airservices Security & Resilience when appropriate
- If the Airservices Legal Counsel deems it necessary under the Freedom of Information legislation
- For internal audit and review purposes, subject to the approval of the Head of Community Engagement
- The Aircraft Noise Ombudsman may listen to a recording subject to the conditions set out in section [7.3 Review of transcripts and recordings by the ANO](#).

#### **8.5.2.1 Release of recordings for security purposes**

If a staff member identifies potential security incidents, including threats of self-harm, a copy of the recording may be provided to Airservices Security & Resilience with the Security Incident Report if requested.

Voice recordings provided to Security must be stored in accordance with security procedures.

#### **8.5.2.2 Review of recordings for quality assurance and training purposes**

Recordings may be used internally for quality assurance and training purposes, with the express permission of the staff member on the recording. Recordings are to be deleted once training is completed.

The only staff members who will be permitted to listen to recordings are:

- NCIS Manager
- Senior Complaints Specialist
- the staff member on the recording

Recordings may also be used for the training of new staff members and continuous improvement of all staff, subject to the NCIS Manager discretion.

A transcript must not be made of the call.

Recordings may only be retrieved by:

- NCIS Manager
- Senior Complaint Specialist

### **8.5.3 Release of transcripts**

Transcripts will not be prepared or released for any reason other than in accordance with section [8.5.2 Release of voice recordings](#).

## 9 Definitions

Within this document, the following definitions apply:

Term	Definition
Aircraft noise improvement	A change to a flight path, procedure or document that provides an overall reduction in noise for the community when considered holistically.
Complaint	An expression of dissatisfaction made to the NCIS by an individual about a relevant issue.
Complainant	A person who makes a complaint, or lodges an enquiry.
Contact	The collective term for complaints and enquiries raising relevant issues made to the NCIS via phone, online form or post.
Complaint management system	All policies, procedures, practices, staff, hardware and software used by the NCIS in the management of complaints. The Noise Complaints Management System (NCMS) is the specific name of the database software used to manage complaints.
Enquiry	A question or request for information about a relevant issue, or following up on the progress of a previous contact.
Relevant Issue	A relevant issue may include one or more of the following: aircraft noise, aircraft movements, flight paths, other aviation activities and operations, the flight path change process and associated community engagement activities, and/or Airservices actions or decisions in regard to these matters.

## 10 References

Title	Number
Commonwealth Ombudsman, <a href="#">Better Practice Guide to Complaint Handling</a>	
NSW Ombudsman, <a href="#">Managing Unreasonable Complainant Conduct Practice Manual</a>	