

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

Procedure

C-PROC0336

Version 7

Effective 11 March 2024

Endorsed: NCIS Manager

Approved: Donna Marshall
Head of Community Engagement

Change summary

Version	Date	Change description
7	11 March 2024	<ul style="list-style-type: none">• Various updates and restructuring of document content to reflect recent process improvements including greater integration of Community Engagement interface and Aircraft Noise Ombudsman feedback and recommendations.• Removed content more appropriate for NCIS training manual• No change bars applied due to the extent of the changes

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

Table of contents

1	Purpose	4
2	Overview	4
2.1	Complaint Management System	4
2.2	Alignment	4
3	The Complaint Process	5
3.1	Intake	5
3.2	Analysis of contacts	8
3.3	Response	9
4	Investigations	11
4.1	Complex investigations	11
4.2	Noise improvement investigations	11
4.3	Investigations into actions or decisions taken by Airservices	12
4.4	Investigations into complaints about staff members	12
4.5	Community Engagement complaints	12
5	Managing Unreasonable Conduct	14
5.1	Unreasonable persistence	14
5.2	Unreasonable behaviour by telephone	15
5.3	Unreasonable behaviour in writing.....	16
5.4	Security threats	16
5.5	Management plans.....	16
6	Documenting Actions or Decisions	18
6.1	Escalation and review requests	18
6.2	Managing high volume	19
7	Aircraft Noise Ombudsman (ANO)	20
7.1	Acceptance of direct referrals from ANO	20
7.2	Management of ANO requests for NCMS data	20
7.3	Review of transcripts and recordings by the ANO	21
8	Other	22
8.1	Privacy	22
8.2	Analysis, evaluation and reporting of contacts	22
8.3	Monitoring of the complaint management system	22
8.4	Continuous improvement	22
8.5	Voice recordings and transcripts.....	22
9	Definitions	24
10	References	24

1 Purpose

This document describes the procedures for the Noise Complaints and Information Service (NCIS) in responding to enquiries and complainants in relation to aircraft noise and 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.

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

Airservices' Complaints Management System is set up to receive submissions (enquiries or complaints) from individuals.

Generally, a complaint should be made by the complainant 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:

- a complainant profile may be created for the first named person, or
- if one party already has a profile in the database, the submission may be processed 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
- or whether it should be referred to another agency.

3.1.2 Case creation

A case is created 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 Phone Service

A complainant has the option of contacting the NCIS by telephone. The phone number is:

1800 802 584 (free call)

10am – 4pm (Sydney time)

Monday – Friday (excluding public holidays)

3.1.4.2 New contacts

For new phone contacts, questions will be asked that allow a clear and comprehensive record of the complainant details and relevant issues to be made.

Due to the complexity of some aviation issues, the complainant may be asked to put those concerns in writing to ensure clarity and/or to enable referral of the matter where required.

In keeping with past Aircraft Noise Ombudsman recommendations, responses in writing are preferred. To respond in writing an email or postal address will be requested.

If a complainant declines to provide an email or postal address, it will be explained that greater detail and clarity is able to be provided by responding in writing and that the response provided if a call back is requested will be less comprehensive. 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, the Complaints Specialist will work with the complainant to identify the most appropriate means of communication. If a complainant requires interpreter assistance, the **Translating and Interpreting Service (TIS)** can be contacted on **131 450**.

Prior to the completion of the call, the Complaint Specialist will seek to:

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

3.1.4.3 Escalation of calls

Complainant calls may be escalated to a more senior team member.

If a complainant requests to speak to a more senior team member, the Complaint Specialist will firstly attempt to assist and answer any matters without having to involve a senior team member. If the Complaint Specialist is not able to assist and the request is necessary, they 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. Calls cannot be “warm transferred” internally.

If a complainant has had a call escalated previously, and on a subsequent call asks for escalation again, a senior team member will review the request and determine if this is warranted, giving regard to the circumstances and the need to allocate resources equitably across all contacts.

The reasons for the decision to escalate or reject this request will be documented on the complainant’s case and advised to the complainant.

3.1.4.4 Threats of self-harm

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

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

Assistance should be sought from colleagues to respond to people who pose a risk of harm to themselves or someone else. This could include signalling to another team member to alert them to the nature of the call or interaction, and that assistance is required.

The conversation will be documented and a senior team member advised of the occurrence. The senior team member will notify Airservices’ Security so police in the relevant area can be contacted and a welfare check completed.

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

3.1.5 Letter submissions

Letters can be sent by post to the NCIS. The 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 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, it does not state the location or nature of the operation being questioned), the response may be restricted to general information or the complainant may be contacted to request additional information to enable a more detailed response.

Submissions consisting of comments or feedback on an open engagement activity will not be responded to by the NCIS. Instead, an acknowledgement email will be sent advising that the comment or feedback has been provided to Airservices Community Engagement for consideration and response, as appropriate.

Where a decision is made not to respond, this will be clearly documented within the complainant's record, either on the complainant's profile or within the complainant's relevant case. Decisions not to respond will generally be due to repeat contacts (see section 3.2.2) or due to unreasonable behaviour (see section 5).

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, the complainant will be informed that a response is being prepared and that further contact on this matter is not required to progress the response. Complainants will also be advised that while they may wish to continue to raise the matter as a complaint, that it will be responded to in a single response.

Once a response has been provided, if a complainant continues to raise the same matter, and there is no new issue or question raised, a response will be sent to the complainant advising that no further information is available and a response to future contacts about the same matter may not be provided.

A senior team member will be advised if the complainant becomes unreasonably persistent (see section 5.1).

3.2.3 Anonymous contacts

Complainants may choose to remain anonymous, however a response will not be able to be provided. Complainants may wish to provide pseudonyms.

Anonymous contacts are not reported in NCIS complainant and complaints reporting for each airport, due to the location of the complainant not being able to be established or their identity to know if these complaints are from single or multiple complainants.

3.2.4 Assignment of cases

Most cases will be handled by a Complaint Specialist.

Cases will be assigned to senior team members according to the following case requirements. 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, or from 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.	Senior Complaints Specialist or Investigator
Repeat complainants who have been advised that a response to new issues only will be provided – if unsure if a new issue has been raised	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 managed 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, the need to allocate resources fairly across all contacts received is considered. Actions may include:

- providing information or an explanation
- investigating the matter
- declining to investigate or further investigate the matter

- asking for further information or clarification
- requesting the complainant to reframe the contact into a clear statement of the relevant issues being raised and the outcome being sought.

The response provided may include:

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

3.3.1 Timeframe for response

The NCIS target timeframe for response is 21 days.

If the NCIS is receiving a high volume of contacts and a response is not able to be provided within 21 days, advice of the delay will be posted on our NCIS webpage, contact form and included in auto-acknowledgement emails.

A response will be provided at the earliest opportunity following the 21 day period.

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

3.3.2 Aviation-related matters outside Airservices remit

When reviewing a contact, if an issue is determined to be within the remit of the Civil Aviation Safety Authority (CASA) or the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department), the complainant will be referred to the relevant organisation, or with the complainant's permission, agreement will be sought from the relevant organisation to transfer the matter to them.

Examples of issues within the remit of other federal agencies include safety (CASA), curfew, movement caps, drones (the Department) and military operations (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, information will be provided where possible, along with an explanation of the organisation that carries the responsibility. Examples of such issues include odours, emissions, health issues, and airline schedules.

If a contact is about operations at airports, the complainant will be referred to the airport or airport operator, or with the complainant's permission, agreement will be sought to transfer the complaint to the airport.

3.3.3 Emergency services

The NCIS is 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.

In responses to complaints about these operations, these movements will be referred to as "emergency services" operations.

4 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).

4.1 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 across all investigations.

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

4.2 Noise improvement investigations

A noise improvement investigation may be conducted for a variety of 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).

Initial assessment of the opportunity for a noise improvement investigation will be conducted by senior team members.

In investigating potential noise improvement opportunities, 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.

Where an opportunity for an improvement is identified outside of controlled airspace, for example a rural location helicopter operation, the senior team member will contact the operator to discuss the opportunity for a noise improvement.

Where an opportunity for an improvement requires investigation of changes to operations inside existing controlled airspace, the senior team member will refer the opportunity to Airservices' Community Engagement for investigation.

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

4.3 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 are forwarded to the relevant area of Airservices for response.

These contacts are recorded and tracked in the NCIS database.

4.4 Investigations into complaints about staff members

The investigation of complaints about Airservices staff members will be referred to the relevant manager who will decide whether the matter requires investigation and if so, how to proceed.

4.4.1 NCIS staff members

Complaints about individual NCIS staff members must be made in writing to the relevant manager, clearly setting out the nature of the complaint. Where accessibility requirements mean a complaint cannot be made in writing, a Complaints Specialist can assist the complainant to submit the complaint.

For complaints about NCIS staff, the relevant manager is the Head of Community Engagement. If the complaint is not satisfied with the response received from the Head of Community Engagement, the matter can be further escalated to 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.

The relevant manager will investigate the allegations and respond in writing to the complainant.

4.5 Community Engagement complaints

Complaints received by the NCIS in relation to Community Engagement practice will be forwarded to Airservices' Community Engagement 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

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

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

At times complainants 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 our people.

When people behave unreasonably, their conduct can significantly affect the progress and efficiency of the NCIS in responding to other enquiries or complaints.

Action will be taken in response to any conduct that negatively and unreasonably affects our people or service, and will support our staff in accordance with these procedures.

This is managed in line with the Commonwealth and NSW Ombudsman guide to managing unreasonable conduct by a complainant, which defines unreasonable conduct as:

- 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 result in a disproportionate amount of time and resources being spent addressing this persistence, impacting on the resources available to respond to other complaints and enquiries.

The NCIS will inform individuals who make repeated contact in a short period of time that multiple contacts about the same matter are not required to enable a response.

Where this continues to occur after giving the above advice, these contacts may be processed into the NCIS database in bulk without being read individually. Each contact will be recorded and reported on in NCIS complaints reporting.

If a complainant has already received one or more responses on the same matter, a senior team member 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 a management plan may be put in place if they continue to lodge multiple contacts about the same issue.

If further contacts about the same matter are received, a response will not be provided to that issue. A senior team member will review the matter to ensure the procedure has been correctly applied and to determine how future contacts should be managed.

5.2 Unreasonable behaviour by telephone

5.2.1 Insults or abuse

If a caller is insulting or abusive, (including racist, sexist and homophobic abuse) they will be warned that the behaviour is unacceptable and that if it continues the call will be terminated.

If the behaviour continues, the call will be immediately and politely terminated. The termination will be documented in the record of the conversation and a Senior Complaint Specialist advised of the occurrence.

Where a caller repeatedly calls to insult or abuse a staff member, management will consider terminating all calls for a period to protect staff. The duration will be determined on a case-by-case basis.

5.2.2 Unproductive calls

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

- asks the same question or makes the same point, despite being provided with 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, the Complaints Specialist will advise the complainant of this, the reasons why, and that if the discussion remains unproductive that the call will be terminated. If the call continues to be unproductive, it will be politely terminated.

The termination of the conversation will be documented and a Senior Complaint Specialist advised of the occurrence.

5.2.3 Recording of calls by complainants

Recording of NCIS staff without their permission is not permitted.

If a Complaints Specialist becomes aware that a call is being recorded without their permission, they will advise the complainant that:

- under NCIS procedures they are not required to continue the call
- they can continue to contact the NCIS via the online form, WebTrak or post
- if they refuse to end the recording, the call will be terminated.

5.2.4 Review of terminated calls

A senior team member may review the recording of terminated calls for quality and training purposes.

When reviewing, a file note 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.

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 a decision on appropriate action.

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

5.3 Unreasonable behaviour in writing

Threatening or abusive complaints received in writing will not be responded to. The submission will be filed on the complainant's case or profile as appropriate.

All contacts of a threatening or abusive nature will be advised to a senior team member who may put a management plan in place in instances of repeated unreasonable behaviour.

5.4 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, the caller should be kept on the phone where possible and a *Bomb Threat Checklist* completed.

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

5.5 Management plans

A management plan assists the NCIS to limit and actively manage unreasonable conduct on the part of a complainant and to ensure the ability to resource responses to reasonable contacts.

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 the NCIS 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, having consulted the Head of Community Engagement. The complainant will be notified of the decision. Each management plan will be reviewed on an ongoing basis.

6 Documenting Actions or Decisions

The Noise Complaints Management System (NCMS) database will be used to document all steps taken to respond to contacts including:

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

Phone conversations will be recorded with 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 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.

Reviews will be tailored to each case.

If a complainant initiated the review, the outcome of the review will be provided in writing.

After a matter has been reviewed, and a complainant requests further review, they will be asked to submit in writing their reasons for requesting a further review. After consideration of the reasons, a decision will be made on whether further review is warranted and how this should occur. The complainant will be advised of the 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.

Complainants will also be advised 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 staff capacity to respond in accordance with these procedures within the 21 day target response timeframe.

This may occur due to one or more factors including:

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

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 the incoming submissions and/or submissions awaiting response remains 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
- additional resourcing options to increase response capacity
- 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 about that issue, 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 it is considered 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, they may require a range of material over a specific time period to be provided or a specific 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 section 7.2.1).

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 that area to the ANO.

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

All 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 Airservices' Community Engagement for further investigation.

8.3 Monitoring of the complaint management system

The NCIS complaints management system is continually monitored 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
- regularly review staff training requirements and learning opportunities
- 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 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/Submission	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, Better Practice Guide to Complaint Handling	
NSW Ombudsman, Managing Unreasonable Complainant Conduct Practice Manual	