

26 June 2025

File Ref: OIAPR-1274023063-39875

By email: [REDACTED]

Tēnā koe [REDACTED]

### **Request for information 2025-190**

I refer to your request for information dated Monday 16 June 2025 which was received by Greater Wellington Regional Council (Greater Wellington) on Monday 16 June 2025. You have requested the following:

*"I have just been on your website looking for your Customer Complaints Policy and can't find it. Can you please let me know if you have one, and if so, where it can be found."*

### **Greater Wellington's response follows:**

Our complaints management policy is attached as requested.

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Local Government Official Information and Meetings Act 1987.

Please note that it is our policy to proactively release our responses to official information requests where appropriate. Our response to your request will be published shortly on Greater Wellington's website with your personal information removed.

Nāku iti noa, nā



Nicky Chilton

Kaiwhakahaere Matua Whakamāhorahora |Group Manager People and Culture

<b>Complaints Policy</b>	
<b>Purpose</b>	GW wants to ensure that it handles complaints from the public effectively.
<b>Vision</b>	We have timely response to and resolution of any complaints from the public in a way that promotes good relations and improves our services and public satisfaction.
<b>Rationale</b>	<p>People have a right to make comments or raise concerns and expect them to be heard by Greater Wellington.</p> <p>Greater Wellington believes that operating an effective complaints process will promote good relations with the public and reassure them that GW is both committed to resolving problems, and willing to improve public satisfaction with the services provided.</p>
<b>Policy Owner</b>	Group Manager People and Culture
<b>Responsibilities</b>	Group managers are responsible for managing complaints in consultation with the Group Manager People and Culture.
<b>Application</b>	This policy applies to those complaints received from the public.
<b>Related Policy and Legislation</b>	Ombudsman Act 1975
<b>Effective Date</b>	Provide the date that the policy is signed by the Chief Executive.
<b>Review Date</b>	This date should be three years subsequent to the policy's approval.

Approved: \_\_\_\_\_

Date: \_\_\_\_\_

Chief Executive

## Complaints Policy

### Purpose and Principles

The purpose of this policy is to enable an effective complaints process that will promote good relations with the public and reassure them that Greater Wellington is both committed to resolving problems, and willing to improve public satisfaction with the services provided.

Our process is modelled on the principles of:

- fairness
- accessibility
- responsiveness
- efficiency.

All complaints will be considered on their merits.

### Policies

Greater Wellington values feedback from complaints and recognises that effective complaint handling will benefit its reputation and operation.

Complaints can:

- highlight weaknesses in our policies, procedures, and service delivery; and
- stimulate us to improve the way we do things.

Good complaint handling will:

- reassure people that Greater Wellington is committed to resolving problems and improving relations with the public; and
- improve our accountability and transparency.

The aim of our process is to achieve:

- a user-friendly system for complainants;
- complainants are heard and understood;
- complainants are respected;
- explanations and apologies are provided where appropriate;
- action is taken as soon as possible;
- clear delegations and procedures for staff to deal with complaints and provide remedies;
- a recording system to capture complaints data;
- the use of complaint data to identify problems and trends; and an outcome of improved service delivery in identified areas

The 3 steps in managing complaints effectively are:

Step 1: Enabling complaints

The complaints process is client focused, visible, accessible, and valued and supported by management.

	<p>Step 2: Responding to complaints</p> <p>Complaints are responded to promptly and handled objectively, fairly and in confidence. Remedies are provided where appropriate.</p> <p>Step 3: Accountability and learning</p> <p>There are clear accountabilities for complaint handling and complaints are used to stimulate agency improvements.</p> <p>The staff member managing the complaint needs to ensure that:</p> <ol style="list-style-type: none"> <li>1. The complaint is acknowledged promptly.</li> <li>2. The complaint is assessed and assigned priority, with a decision made as to who will deal with the complaint and when it should be completed – Greater Wellington aims to reply within 20 days. It is important in assessing and assigning the complaint to ensure the relevant people are across it and a meeting at the outset to decide on what the correct approach is, is important</li> <li>3. Where the complaint potentially poses a substantive risk to Greater Wellington’s reputation, finances and/or legal position, the complaint is referred to the relevant manager and group manager.</li> <li>4. If the matter cannot be resolved immediately and a review is required, it should be planned, with consideration of what action needs to be taken to consider the complaint and who needs to be consulted.</li> <li>5. The review should resolve factual issues and consider options for complaint resolution.</li> <li>6. The response to the complainant should be clear and informative, as far as possible, explaining the outcome of the complaint and providing reasons for any decisions made or remedies offered.</li> <li>7. The response should include information about other possible remedies if the complainant is not satisfied.</li> <li>8. Any systemic issues that arise because of the complaint should be considered and acted on.</li> </ol> <p>8. Action should be taken to record the complaint and its outcome in He Kete, and to report to management as appropriate.</p>
<p><b>Guidelines</b></p>	<p>Staff members who receive a complaint about GW should ensure that their manager is aware of them.</p>

Complaints from members of the public can often include requests for official information or personal information. In the instance that a complaint is received that contains a request for official and/or personal information, the request must be dealt with through GW's LGOIMA or Privacy Act processes. If a staff member is in doubt as to whether a complaint includes a request for information please discuss the matter with Democratic Services as soon as possible.

#### **Complaints about staff**

Any complaints that relate to staff behaviour should be forwarded to the Head of Human Resources who will determine the people who need to be involved and the process to manage and deal with the complaint.

#### **For other complaints that could be serious or pose a risk to GW**

If the complaint is one that is serious or potentially poses a substantive risk to Greater Wellington's reputation, finances and/or legal position, the complaint should also be referred to the group manager.

In this case, the group manager will work in consultation with the Group Manager People and Customer, and with the relevant parties to determine who the complaint should be assigned to for action.

Including the Group Manager People and Customer is to ensure a consistent "whole of organisation" approach to the management of such complaints.

The relevant group manager and Group Manager People and Customer will also decide whether the complaint should be brought to the attention of the Chief Executive.

#### **For all complaints**

Complainants should be responded to within 20 working days. If this timeframe is unable to be achieved the complainant should be provided with an update on progress and an updated estimated timeframe for the provision of the substantive response.

Details of the complaint, investigation, response, and action taken need to be filed appropriately.

#### **When complaints may be viewed as unreasonable, frivolous, vexatious or malicious**

Staff safety and well-being are paramount when dealing with unreasonable complainant conduct or frivolous, vexatious, or malicious complaints.

Useful guidance to help in managing unreasonable complainant conduct can be found at

[managing\\_unreasonable\\_complainant\\_conduct\\_manual\\_october\\_2012.pdf \(ombudsman.parliament.nz\)](#)

<b>Definitions</b>	<p><b>Unreasonable complainant conduct (UCC)</b> can be defined as any behaviour by a current or former complainant which, because of its nature or frequency, raises substantial health, safety, resource, or equity issues for the parties to a complaint.</p> <p><b>A frivolous complaint</b> is one about a minor or trivial matter, or an issue so vague or poorly explained that we cannot consider it meaningfully. It might also be about a matter that we consider we have already resolved, or a matter that is of so little value that investigating it would be disproportionate in terms of time and cost.</p> <p><b>A vexatious complaint</b> is one that is made with the intention of, or has the effect of, being disruptive, and can show signs of escalating unreasonableness by the complainant. They might make contact on the same issue multiple times.</p> <p><b>A malicious complaint</b> is one that appears motivated by a purpose that is dishonest or is made with the intention of causing harm. The complainant may be unwilling to accept our response, deny receiving a response, or may become threatening in their attitude and behaviour.</p>