



POLICY MANUAL

POLICY NUMBER: CORPORATE-043

SUBJECT: CUSTOMER COMPLAINTS HANDLING POLICY

Purpose/Objective:

This Policy is intended to enable the City of Brantford to promptly and effectively address formal program and service delivery complaints raised by members of the general public that were not satisfactorily handled via regular customer service channels or by frontline staff. The Policy will assist the municipality in providing excellent service to the public and contribute to continuous improvement of operations. The municipality continuously strives to enhance customer satisfaction by:

- Providing timely and accurate response to complaints, and
- Using complaints as an opportunity to improve program and service delivery issues

Policy Statement:

The City of Brantford is committed to a consistent and uniform process to respond to complaints received from members of the public regarding City programs, facilities, City services, staff or operational procedures in a timely manner. The Corporation of the City of Brantford will use reasonable efforts to ensure that its external facing policies, practices and procedures promote customer service and reflect the guiding principles of customer service excellence.

Definitions:

Formal Customer Complaint – any expression of dissatisfaction about the action or lack of action taken regarding operations, facilities or services provided by the City of Brantford or by a person or body acting on behalf of the City of Brantford. The term “dissatisfaction” is key to the definition of a complaint. Feedback of a positive or general nature, comments on a service or facility that do not require a response, or requests for service, are not complaints. Complaints imply that the complainant is unhappy with the service received and that they require a follow-up response in regards to an expressed issue and/or concern.

For the purposes of this Policy, a formal customer complaint is distinct from:

- a request for service made on behalf of a citizen for a specific service, or to notify the municipality that a scheduled service was not provided on time
- a general enquiry or specific request for information regarding municipal service
- an opinion or feedback, comment and expression of interest in a program or service
- an expression of approval or compliment for municipal staff member, program, product or process.
- a suggestion or idea submitted by a customer with the aim of improving services, programs, products or processes.

Complainant – the person who is dissatisfied and filing the complaint. Anyone who uses or is affected by City services may make a complaint including: residents, people who work in or visit the city, local businesses or community groups.

Compliment – an expression of appreciation for satisfactory or above-satisfactory service.

Feedback – Input from a resident/customer that is neither positive, nor negative, but provides input or ideas.

Service Request – a request for a specific service provided by the City of Brantford as defined in the City's Customer Relationship Management System (CRM) and/or via online service request forms on a City of Brantford website.

Responsibilities:

- Any member of the public can make a formal complaint.
- Brantford City Council is responsible for considering and endorsing the content and implementation of this Policy and subsequent updates.
- The CAO, City Commissioners and Directors are responsible for taking measures to help their staff act in compliance with this Policy.
- Managers and Supervisors must ensure that their staff are aware of and understand the Policy. Managers and Supervisors are also responsible for facilitating a prompt response to all complaints received by their staff to ensure that service standards are achieved.
- Commissioners and Directors are responsible for the receipt and resolution of all complaints according to the service standards set out herein. Commissioners and Directors hold responsibility for departmental compliance to the Complaints Handling Policy.
- All City employees are required to comply with the Policy requirements and share responsibility for execution. All employees are expected to have knowledge and awareness of the City's requirement to receive complaints, the process through which a complaint can be made and the service standards that apply to complaints.

Application of the Policy:

This Policy is applicable to customer complaints as defined above. This Policy applies to formal complaints that customers provide by email, phone or using the [City's online Complaint Form](#) with respect to any expression of dissatisfaction about the action or lack of action taken regarding City operations, facilities or services provided by the City of Brantford or by a person or body acting on behalf of the City of Brantford, where a response or resolution is explicitly expected. All formal

complaints against any member of City staff filed necessitates a response unless considered to be frivolous or vexatious in nature.

"Frivolous" typically refers to something that is lacking in seriousness or merit. In this context, it suggests that if the request or situation is trivial, pointless, or lacks validity, it doesn't require a response.

"Vexatious" refers to something that is intended to annoy, harass, or burden the recipient without any legitimate reason. If a complaint is vexatious, it also doesn't necessitate a response.

Furthermore, the Policy does not apply to complaints of the following nature:

- Negative commentary regarding staff members that are employed by a service provider contracted by the municipality, (those employees shall be subject to the policies of that service provider);
- Issues addressed by legislation, or an existing municipal bylaw, policy or procedure;
- A decision of Council or a decision of a Committee of Council; or,
- Internal employee complaints; or,
- Matters that are handled by a tribunal, court of law, quasi-judicial board, or other administrative or judicial body with authority to hear the complaint.

Complaints that are received that are considered to be frivolous or vexatious in nature upon review by the Director of the related department shall be responded to by advising the Complainant that their complaint has been deemed frivolous and/or vexatious. If the Director is uncertain about the nature of the complaint, judgment will be sought from the Commissioner and the Commissioner may confer with the Executive Leadership Team before determining if the complaint is frivolous and/or vexatious.

Complaint Process:

Where appropriate, it is the responsibility of the complainant to attempt to resolve issues with respect to City services with City employee(s) directly involved with the issue. It is the responsibility of City employees to attempt to resolve issues or concerns before they become formal complaints. The employee can direct customers to complete a formal complaint using the City's online form if they are not satisfied with the resolution the employee has attempted to provide.

1. Filing the complaint

Where a frontline resolution cannot be achieved, customers should be directed by staff to complete a formal complaint by completing the [City's online Complaint Form](#). The Form automatically directs to the Supervisor of Customer Service and the Director of Communications, Community Engagement and Customer Service. Should it be required, Customer Service staff will engage the relevant department Director to investigate the concern/issue and develop an appropriate response. Where possible, responses to formal complaints will be provided by the Supervisor of Customer Service or the Director, Communications, Community Engagement and Customer Service. In cases where additional subject expert information is required, the complaint will be forwarded to the Director of the department to respond and/or assign a delegate to respond.

Should the customer wish to provide a verbal complaint or send an email, contact information to reach the Customer Service Supervisor or Director, Communications, Community Engagement and Customer Service may be provided by staff.

2. Receipt and Acknowledgement

When complaints are received by Customer Service staff directly, the Supervisor of Customer Service, or designate, shall forward a copy to the Director of the Department the complaint is regarding, or designate. Within three (3) business days of receipt of the complaint, the Customer Service Supervisor or department designate shall acknowledge to the complainant, if contact information is provided, in writing that the complaint has been received, and provide a status of the investigation and when an additional response can be expected.

3. Investigation

A Director, or designate, may not delegate the authority to investigate a formal public complaint to an employee who is or may be named in the complaint. If a complaint is made against a Director, or Commissioner, the Chief Administrative Officer or designate shall conduct the investigation.

If a formal complaint is made against the Chief Administrative Officer (CAO), the Director of Human Resources and the Commissioner of Corporate Services may determine whether or not the complaint is frivolous and/or vexatious and if determined so, a response indicating such will be sent to the Complainant. If considered a legitimate complaint, the Director of Human Resources and the Commissioner of Corporate Services may consult with the Mayor to determine if designating to another qualified individual at arms-length from the municipality, to investigate is warranted.

In warranted cases, a designated investigator shall review the issues identified by the Complainant and in doing so may:

- Review relevant municipal and provincial legislation;
- Review the municipality's relevant policies and procedures and service levels approved by City Council;
- Review any existing related documents;
- Interview employees or member(s) of the public involved in the issue;
- Identify actions that may be taken to address the complaint or improve municipal operations

4. Notify

Any complaints that should be forwarded to another department should be emailed, with a copy to the Supervisor, Customer Service.

5. Decision

Within thirty (30) business days of receipt of a complaint, the Director, or designate, shall provide a response in writing, if contact information is provided, to the complainant.

The response shall include:

- Whether the complaint was substantiated,

- If the complaint is not substantiated, provide reason(s) for the decision; and,
- Any actions the municipality has or will take to improve services as a result of the complaint.

If the Designated staff member is unable to provide a response within thirty (30) calendar days, they shall notify the Complainant of the delay and provide an estimate of when a response is expected to be provided.

6. Record

The Director or designate shall retain a file on all communication with the complainant including the resolution in accordance with the municipality’s records retention bylaw. If a municipal employee was the subject of the complaint, a copy of the record may be retained in their personnel file, notwithstanding any procedures outlined in existing collective agreements.

7. Reporting

Directors are responsible for advising the Supervisor, Customer Service when the complaint has been resolved. The Director, Communications, Community Engagement and Customer Service shall provide a Summary Report to the Senior Leadership Team outlining the complaints received and outcomes on an annual basis.

8. Compliance

Commissioners and Directors are responsible for implementation and ongoing compliance with the Corporate Complaints Handling Policy. Quarterly reports will be provided to Commissioners and Directors indicating the number of complaints received during a specified timeframe, the number of complaints to date, and the number of complaints currently outstanding.

9. Monitoring/Contraventions

The Director, Communications, Community Engagement and Customer Service, and the Supervisor, Customer Service will monitor corporate compliance with this Policy and will follow up with appropriate Commissioners for further action as required.

10. Appeal

In the event complaints cannot be resolved through the City’s Complaint Handling Policy, the Complainant may choose to submit to the [Provincial Ombudsman’s office in accordance with the provisions of Bill 8.](#)

<p>Date of Enactment: May 22, 1984</p>	<p>Related By-law Number/Staff Report Number: 162-91, 88-2001 Chapter 155 of City of Brantford Municipal Code</p>
<p>Review and Amendment Dates: December 31, 1991 May 22, 2001</p>	<p>Department Responsible for Review: Corporate Services</p>

March 2009 (Review) August 24, 2015 (Review)	
Review and Amendment Date: October 24, 2023	Department Responsible for Review: Communications, Community Engagement and Customer Service