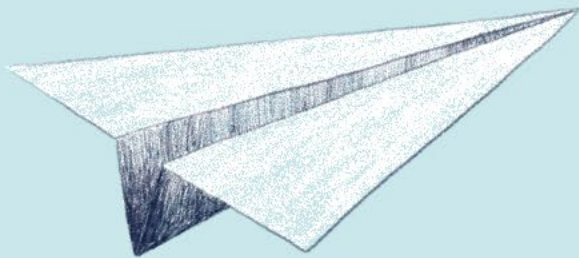


GUIDE TO COMPLAINT HANDLING FOR B.C. LOCAL GOVERNMENTS

School of Public Administration

UNIVERSITY OF VICTORIA
2023



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Message from Drs. Tara Ney and Emmanuel Brunet Jailley

The University of Victoria is proud to be working with the European Union through a Jean Monnet funded project under the Erasmus+ Program of the European Commission to bring Human Centered Design in local government complaint systems to British Columbia.¹ While some aspects of complaint systems in certain public sectors are regulated in the EU, in BC local government there exists no regulatory framework. We wanted to learn from the work our EU partners have advanced, to develop complaint systems in local government that will innovate service design and increase access to justice in local government.

This project was first sponsored by a Partnerships Grant from the Social Science and Humanities Council (SSHRC) in 2018 where Drs. Tara Ney, Emmanuel Brunet Jailley, Chris Gill, and Carol Brennan convened 21 international academics and experts with local BC stakeholders to explore how to bring human-centered design methodologies to complaint systems design.² Wanting to build on this initial project, in 2020 Drs. Ney and Brunet Jailley were awarded a grant by the EU Jean Monnet Erasmus+ Program Fund to continue this work, and specifically develop and implement a complaints guide for local government in BC. This grant was developed and awarded in partnership with our European partners from University of Glasgow, Queen Margaret University, and Herzog University³, and local BC public sector experts⁴.

The Guide to Complaint Handling for BC Local Governments is the beginning of this project and to develop it, we enlisted the expertise of BC local government consultants, Allison Habkirk,

Brenda Gibson, Linda Adams, and Elizabeth Brennan. They took an iterative approach involving interviews with BC local government administrators to learn about complaint handling in a BC context, a scan of complaint handling approaches in other jurisdictions, consultation with our European partners, and then feedback from local governments whether the proposed content would be practical and relevant to them. As local governments begin to implement these complaint handling systems, we will continue to consult and iterate to improve readability, relevance, and effectiveness of the guide which we regard as a living document.

We wish to acknowledge the valuable contributions made to this guide by those with whom we consulted during its development. We thank those who shared their experience and perspectives, including the B.C. Office of the Ombudsperson, The Province of BC Ministry of Municipal Affairs, The Local Government Management Association, the Union of BC Municipalities, CivicInfoBC, and the following BC Local governments:

Municipalities:

Bowen Island Municipality	City of Grand Forks
Village of Canal Flats	City of Kelowna
City of Castlegar	Village of Lumby
District of Clearwater	City of Nanaimo
Village of Cumberland	District of Sechelt
City of Fort St. John	City of West Kelowna
	City of Vancouver

Regional Districts:

Regional District of Kitimat-Stikine
Alberni-Clayoquot Regional District

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¹ The European Commission's support for the production of this publication does not constitute an endorsement of the contents, which reflect the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein.

² SSHRC recipients were Tara Ney and Emmanuel Brunet Jailley (PIs, and award recipients), and participants included Lisa Amsler, Jane Williams, Chris Gill, Carol Brennan, Debra Gillan, Christian Gill, Mariana Hernandez Crespo Gonstead, Michelle Le Baron, Darin Thompson, Jerry McHale, Aaron Leakey, Richard Simmons.

³ Chris Gill, Jane Williams, and Sabine Junginger, respectively

⁴ Allison Habkirk, Robert Lapper



Orienting

To support you to improve the way your organization handles complaints, we will first orient you to some key ideas about complaints and complaints systems. In this section you will learn what a complaint is, how complaint systems can be of value to your organization, and how an effective complaint system is aligned with responsive government.

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Is this guide for you?

This guide is intended for BC local government practitioners. The materials provide practical advice applicable to all local governments but tailored primarily to the needs and capacity of those that are small to medium sized. It was informed by consultation with a number of BC local government practitioners, and it shares tips and useful practices from them.

Complaints provide an opportunity for increased public participation in local governance, and positive dialogue and improved relations with community members; they can also help align services with community needs, improving public trust and confidence. The guide sets out a user-focused and accessible complaint handling system that can deliver fair and prompt resolution of complaints and allows for learning from complaints to drive service improvements. The guide describes how to go about making complaint handling changes and aligns complaint handling with other elements of a public service focus, where views of community members are valued inputs supporting continuous improvement.

The guide is for you if you want:

- tips from other BC local governments on how to use community engagement and service requests to understand and respond to community needs;
- ideas about how to handle complaints, turn them into positive engagements with community members and opportunities for improved services, while potentially saving staff time and resources over the long run;
- details about how to set up a fair and effective complaint handling system, a key feature of which will be a complaint handling policy; and/or
- a model complaint handling policy and related procedures and sample user-oriented materials explaining your complaint handling processes.

Why complaints matter

A complaint is a declaration that someone is dissatisfied with something and expects a response. An innovative way of seeing complaints is as a free form of community engagement that can provide valuable feedback to local governments about issues that matter to community members. They provide an opportunity for the local government to respond to those issues within its mandate, contributing to access to justice and demonstrating local government actions aligning with community interests.

**COMPLAINTS CAN
SHOW A LOCAL
GOVERNMENT
HOW IT CAN
BETTER SERVE THE
COMMUNITY**

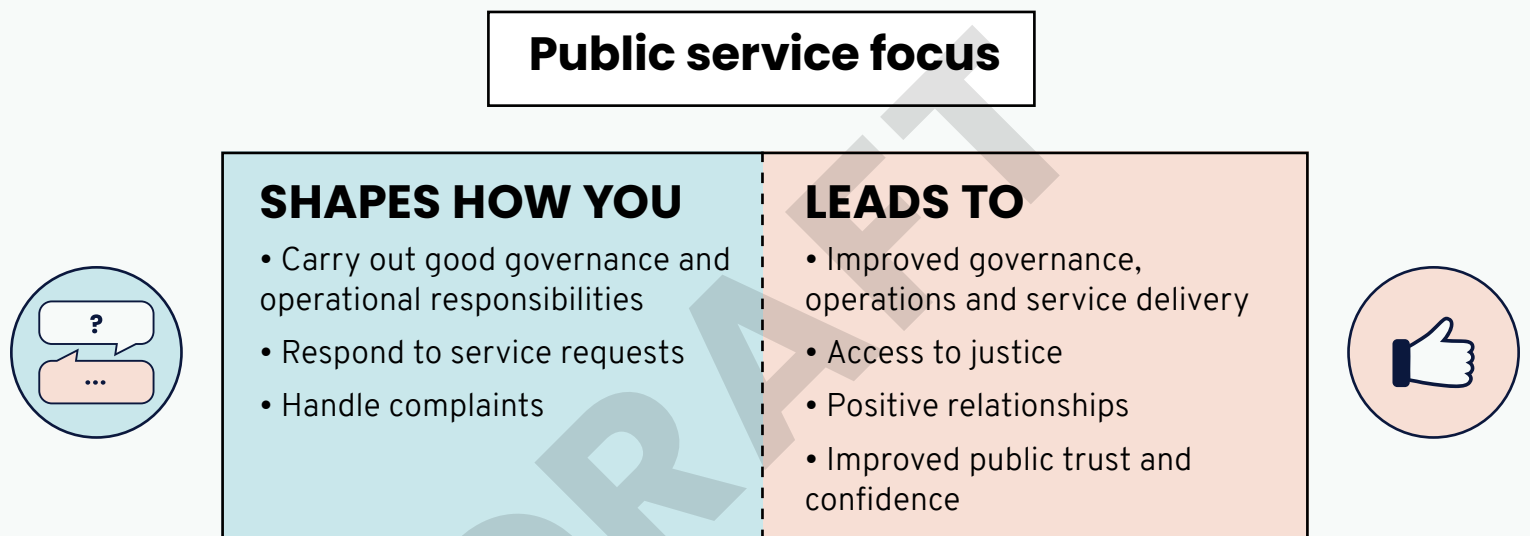
Handled well, complaints can help build positive relationships with community members, drive service improvements, and build public trust and confidence in the local government. Complaint handling that aims for early resolution where possible can also be cost effective as compared to the cost of dealing with escalating complaints not initially dealt with fairly, promptly and effectively.



Public service focus

A public service focus shapes everything from governance and operations to complaint handling. This focus respects community members, encourages community engagement and treats people and their concerns fairly. It also helps the local government better understand community needs and position itself to respond to those needs. Complaints are just one of many ways to obtain information about what the community needs.

Being proactive about getting community feedback can be cost effective compared to relying on complaints to inform service improvements. Consequently, while this guide focuses on complaint handling, it also provides tips for proactive community engagement. You will come to see that as you engage with, and respond to feedback from the community, you will likely mitigate complaints.



A public service focus supports a comprehensive approach to facilitating proactive engagement. Two features of a public service focus are 1) responsive governance, and 2) responsive service delivery handling, and are explained below. We suggest using a public service focus which allows local government to be more responsive to community needs.

Responsive governance

Carrying out good governance and operational responsibilities with a public service focus helps inform decisions and avoid public dissatisfaction. Community engagement before decisions are made and proactive two-way communication on an ongoing basis are key, as these help the community understand how you are working for them, and helps you understand what's important to the community.

Tips for responsive governance⁵

- be proactive about including community members in decision-making; make sure all voices are heard, and let them shape what you're doing and how you do it (e.g. 'Have your Say' or other feedback options on your website for special initiatives; planning how to engage vulnerable people and/or demographic groups who may otherwise be underrepresented in engagement processes);
- apply an equity lens to service delivery to help remove barriers and support fair and equitable access to services for everyone (e.g. provide program information about services in more than one language);
- complaints are sometimes less about what you're doing than how you're doing it (e.g., talk with businesses fronting a planned road upgrade to get their ideas about better ways to design it for better results, and undertake it with fewer disruptions);
- think about communications not just as a way to get your message out, but also a way to get the public's message in (e.g., What is being said on social media that tells you how you could do a better job?; 'feedback' options on your website);
- find approaches to communicate with the public in ways that suit them (e.g., email subscription services for items of particular interest that people can sign up for; plain language 'council highlights' posts on your website after every meeting);
- rumours and accusations can often thrive in a communications void, so consider proactive communications and/or find ways to correct misinformation, including providing responses to concerns expressed via social media posts where appropriate;
- be proactive about communications for things that are likely to raise public concerns (e.g., flyer distribution in utility bills with budget and tax rate information, social media posts, mainstream media engagement, open houses, community newsletter articles, front page Qs & As on your website for the new municipal hall project, highway signage/ social media posts about upcoming road closures);
- consider communications when you are starting, stopping, or changing something;
- find opportunities to talk about what you do and what's outside your jurisdiction to manage expectations about what you can deal with (e.g., regular updates in a community newsletter, website highlights for specific services or works).

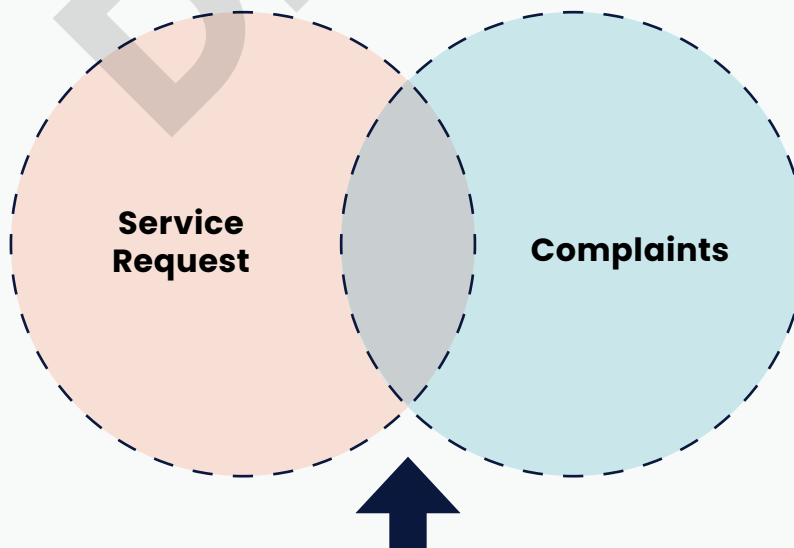
⁵ See Resources for links to a range of BC Local Government examples

Responsive service request handling

This guide uses 'service requests' to mean things like:

- a first-time notification of a repair or maintenance issue related to the local government's services or facilities (e.g., streetlight out);
- a first-time request for service (e.g., water connection, business licence);
- requesting an explanation, asking for information, asking a question.

Community members expect their local government to respond to their service requests promptly and fairly. Doing so not only shows the public your commitment to quality service delivery, but also prevents the request from escalating into a complaint.



If not handled well, service requests can lead to complaints.

Tips for responsive service request handling⁶

- develop service standards (e.g., road maintenance priorities and schedules), and document procedures (e.g., user-friendly materials to explain complex approval processes) to let people know what to expect when they make a service request: staff become accountable for meeting standards and the public gain an understanding of process and constraints;
- think about how your approach to service requests is perceived by community members, ask them about this if you can, and consider ways to make it easier for them (e.g., make it clear how a service request is made and to whom; consider a single point of contact for service requests, so that the public don't need to figure out which department to deal with); consider a webpage easily accessible from your main page that explains how to make service requests and allows for on-line requests, but make sure there are other ways to submit a request for those that may prefer these (e.g., by phone, in person);
- develop systems to support internal collaboration on complex service requests involving multiple departments, to make the service request handling 'seamless' from a user's perspective, improve service delivery, and reduce response times;
- track requests to help make sure things get done (e.g., spreadsheets, calendar reminders, databases, apps for community members to enter requests directly into a tracking database, like CivicInfo's 'Tell the Town' app, or other commercial software designed to track service requests);
- to build public trust and confidence, treat people fairly and with respect, and ensure processes and decisions are fair⁷;
- where appropriate, let people know how you responded to their service request, either individually where a request relates directly to the person, or through websites, social media or other communications, if the request is more widespread (e.g., streetlight out);
- emphasize service excellence: empower staff to solve problems and support them in doing that.

⁶ See Resources for links to a range of BC local government examples

⁷ See Resources for BC Ombudsperson's fairness resources, and their Complaint Handling Guide, which also provide information on fairness

Case example – public service focus

One BC municipality takes a multi-pronged proactive approach to governance and service improvement based on a strong public service focus.

‘It’s not just about getting the job done – it’s about thinking how we can do things better, in ways that take the public’s needs into consideration and that make more sense’.

A public service focus runs throughout the organization including a communications department with responsibility to help line departments understand how their work affects community members, and systems and tools to help maintain focus, such as project planning templates that take public input into consideration.

Their approach seeks community input, from asking for feedback about service request responses (e.g., how was your experience? what could we do better?) to finding those who have strong opinions on social media and

talking with them to find out more about their concerns and what the municipality could do better.

Service improvements made sense when public input was considered. For example,

‘concerns about detours when folks are trying to get their kids to school made us rethink starting paving crews at 8 am. A change to 9 am didn’t cost a thing’.

They also take a proactive approach to communications, including producing a quarterly report that lets the public know what the municipality has been doing, and speaking at every community association AGM.

‘We’ve found that communicating honestly and openly in these types of forums helps build trust, and community members will spread the word for us’.



How to Start

Setting up a new system can be overwhelming—where do I start? In this section we lay out a practical framework for local governments and some concrete steps to consider as you plan your system. You will also find many references that will assist you to deepen your knowledge and skills in building your system.

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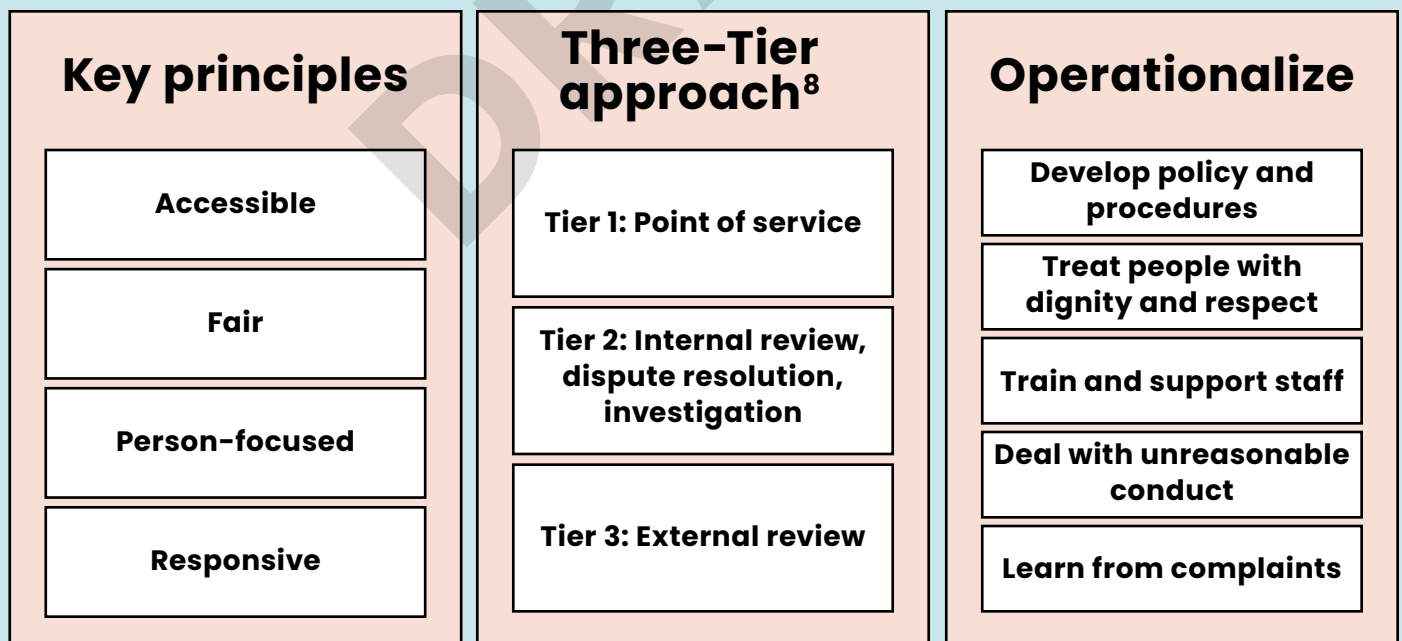
Making complaint handling systems more effective

Ideally, how you handle complaints will be an extension of your public service focus, and complaints will be seen as opportunities to engage positively with community members and respond to their concerns. Being systematic about how complaints are handled, including having written policies and procedures, helps to build clear expectations, among both those handling complaints and users of the system.

There is no one universal ‘right way’ to handle complaints, and each local government will need to develop a system that works in their unique circumstances; however, there is a growing consensus internationally about the underpinnings of an effective complaint handling system. The approach set out in the [BC Ombudsperson \(BCO\) Complaint Handling Guide: Setting up Effective Complaint Resolution Systems in Public Organizations](#) is consistent with that consensus.

This guide takes the approach outlined in the BCO complaint handling guide and tailors it specifically to local governments. Key themes from the BCO Guide are represented in the graphic below, and the full guide is recommended reading for all local governments wanting to change the way they handle complaints.

Key themes for a complaint handling system



⁸ The BCO Guide describes a Three-Tier Approach, with Tier 3 being an External Review. In this Guide the Model Local Government Complaint Handling Policy, and the Procedures, as well as the Sample Complaint System User Guide can be used as part of the one and two-tier systems since these are steps of the process under the local government control. This does not affect the availability of external reviews to users of the local government system. Local governments will want to ensure they make dissatisfied persons aware of external review or appeal processes that may be available to them, at the time the complaint is made, as well as during and/or at the conclusion of the local government complaint handling process.

COMMUNITY MEMBERS NEED A PLACE TO RAISE THEIR CONCERNS AND COMPLAINTS AND HAVE THEM DEALT WITH FAIRLY. COMPLAINT HANDLING PROCESSES WILL HELP TO MEET THESE NEEDS IF THEY:

Are easily understood and accessible to all;

Keep people informed and treat them, and their concerns, with respect;

Provide for learning gained from complaints to drive service improvements;

Aim for early resolution of complaints whenever possible; and

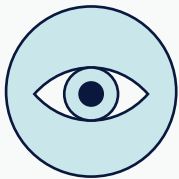
When early resolution is not possible, provide for information gathering to determine what action (if any) is appropriate.

Getting started

Making improvements to the way you handle complaints needn't be an onerous exercise. Key steps in the process are: consider what you want to change, develop a policy and procedures to accomplish that, and prepare staff for any new roles they will be taking on. Depending on your circumstances, changes can be made all at once or incrementally.⁹

IMPROVING YOUR COMPLAINT HANDLING

How to get from where you are to where you want to go



PREPARE

Look at current approaches; consider users' experience; is there a better way?; plan improvements



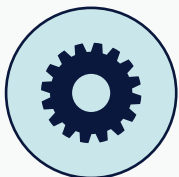
DEVELOP POLICY AND PROCEDURES

Decide what complaints you'll handle under your policy; develop policy and procedures for these; Council/Board adoption of policy and management adoption of procedures



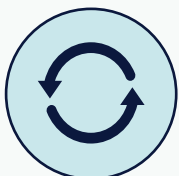
TRAIN AND SUPPORT

Prepare everyone for their roles; training and skill development; create a safe environment to make mistakes and learn; set up support structures like team meetings and debriefing opportunities



IMPLEMENT

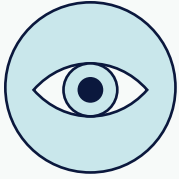
Start using the system; treat people fairly and with respect; aim for early resolution whenever possible



LEARN AND IMPROVE

Use complaint input to improve servicing; periodically evaluate complaint handling to improve system

⁹ If you wish to drill deeper into each of these steps an excellent resource is "The Nuts and Bolts of Setting Up an Ombuds Office Course" available through the International Ombuds Association (IOA). Here you will learn about code of ethics, intake processes, data management protocols, and how to plan outreach strategies and training maps. <https://www.ombudsassociation.org/nuts-bolts-of-setting-up-an-ombuds-office-course>



Prepare: Look at what you're doing now and evaluate how that's working

Start by looking at how you are handling complaints now. Aim to understand how well this is meeting your needs and the needs of the community.

Ask

- Can we draw on a Human Centered Design approach?¹⁰
- What kinds of complaints do we get?
- How do we respond?
- Are users satisfied?
- What's working and what isn't?
- How well are we serving people, including vulnerable people, and those who may be reluctant or unable to complain?

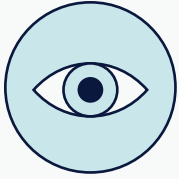
Consider

- Internal discussions with everyone involved from front-line staff through to the Council or Board and users
- Asking community members for their perspectives, through things like:
 - a post-complaint survey;
 - creating a diverse community member focus group including people who may typically be underrepresented in design processes

Tools / Resources

- [BCO Complaint Handling Guide](#) self-assessment checklist
- [SPSO 'Why do Complaints Matter to Board Members'](#) (while specific to a Scottish system, some content (e.g., Setting the Right Culture) is applicable to BC local governments)

¹⁰ Williams, J., Gill, C., & Hirst, C. (2022) Towards therapeutic complaints resolution; In: M. Groves and A. Stuhmcke The Ombudsman in the Modern State (eds.) London, UK: Hart Publishing (pp. 265-286).



Prepare: Consider what your complaint handling could look like for users

Think about an ideal system from both an organizational perspective and a user's perspective, because whatever you come up with needs to work for both.

Ask

- Do we see complaints as threats or opportunities?
- Are public service providers trauma-informed?¹¹
- Are we able to learn from complaints?
- Do complaints drive service improvements?
- Are users satisfied?
- What kinds of outcomes are community members looking for when they complain?
- How can the user experience be improved?

Consider

- Involving community members on an ongoing basis during design, implementation and evaluation of the complaint system changes (e.g., a series of workshops or an ongoing committee)
- Developing design and evaluation criteria based on outcomes that are relevant and important to users. Ask users directly what they want. Reports such as the 'My Expectations' summarized below may be a useful starting point for framing those discussions.

Tools / Resources

- [BCO Complaint Handling Guide](#)
- [UK 'My Expectations' report](#), the results of which are summarized in the graphic below. While this relates to health and social care in the UK, the vision established through extensive consultation with the users of the complaint systems may well be in keeping with what your community members want: a system that is easy for users to use, where they feel listened to and understood, and that provides outcomes that address their complaint.

¹¹ Gill, C. Sapouna, M., Hirst, C., and Williams, J. (2019) Dysfunctional accountability in complaint systems: The effects of complaints on public service employees. Public Law, Oct, 644-664.

My Expectations: A user-led vision for raising concerns and complaints¹²

1



Considering a complaint

» I felt confident to speak up. «

- I knew I had a right to complain
- I was made aware of how to complain (when I first started to receive the service)
- I understood that I could be supported to make a complaint
- I knew for certain that my care would not be compromised by making a complaint

2



Making a complaint

» I felt that making my complaint was simple. «

- I felt that I could have raised my concerns with any of the members of staff I dealt with
- I was offered support to help me make my complaint
- I was able to communicate my concerns in the way that I wanted
- I knew that my concerns were taken seriously the very first time I raised them
- I was able to make a complaint at a time that suited me

3



Staying informed

» I felt listened to and understood. «

- I always knew what was happening in my case
- I felt that responses were personal to me and the specific nature of my complaint
- I was offered the choice to keep the details of my complaint anonymous and confidential
- I felt that the staff handling my complaint were also empowered to resolve it

4



Receiving outcomes

» I felt that my complaint made a difference. «

- I received a resolution in a time period that was relevant to my particular case and complaint
- I was told the outcome of my complaint in an appropriate manner, in an appropriate place, by an appropriate person
- I felt that the outcome I received directly addressed my complaint(s)
- I feel that my views on the appropriate outcome had been taken into account

5



Reflecting on the experience

» I would feel confident making a complaint in the future. «

- I would complain again, if I felt I needed to
- I felt that my complaint had been handled fairly
- I would happily advise and encourage others to make a complaint if they felt they needed to
- I understand how complaints help to improve services



Develop Policy and Procedures; Train and Support

Plan what changes will be needed to improve complaint handling, including how and when you will make them. Key activities at this stage include developing a policy and related procedures, sorting out who will be responsible for what and preparing everyone for their roles, and, developing tools and processes to support the system.



Ask

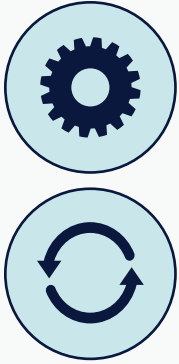
- Do we have several processes that we could combine to provide more consistent service to users?
- Do community members know how to make a complaint and what to expect when they do?
- Do we have a policy in place, or do we need to develop one?
- Who will be involved in complaint handling and what training and support do they need?
- What tools would support review, resolution and investigation of complaints (e.g., guidelines, templates, forms)?
- How will we manage data on complaints and their outcomes so we can learn from them (e.g., data management systems, evaluation tools)?

Consider

- If significant changes are wanted but capacity is an issue, consider starting small and expanding over time, building success and capacity as you go (e.g., limit the number of complaint types and/or start with less robust data management so input and analysis aren't overwhelming while you learn what's important to track and how to do that).

Tools / Resources

- [BCO Complaint Handling Guide](#)
- [Model Local Government Complaint Handling Policy](#)
- [Model Local Government Complaint Handling Procedures](#)
- [BCO Fairness and Complaint Handling webinars](#) – quick tips and other training and resources
- [SPSO various templates and tools](#) – specific to a Scottish context, but may provide a starting place to adapt to meet local governments needs – under 'Guidance and resource materials for organisations' tab



Implement; Learn and Improve

Your policy and procedures set out what you will do to address complaints, but not necessarily the specifics of how you will implement the new system and learn from complaints. Ideally, before you adopt a new complaint handling policy, everyone involved will be able to develop and practice some key skills, and you'll have set up structures to support the team's continued learning. Skills and approaches will evolve over time as the team gains experience and confidence.

Ask

- Are issues coming up after we implement that we need to address?
- What on-going training and skills development is needed?
- Are we being user-focused?
- Are we adequately supporting staff? Have we asked them what they need?

Consider

- Ongoing team meetings where staff can support each other and learn together;
- Post-implementation enhancements (i.e., consider what further changes, tools or training are needed once you've handled some complaints under the new system).

Tools / Resources

- [Being Complained About](#) – guidelines on avoiding potentially negative effects of complaints on employees

Tips for setting up a complaint handling system

- ensure the systems you put in place to address, document, and evaluate complaints are easy to use and appropriate to your needs and capacity; a simple fair system that is easily understood and consistently applied is what's needed (e.g., one small local government keeps a running list of complaints handled at the front counter and talks about them every few weeks to see what service improvements might be needed);
- consider who does what in the complaint handling process, how decisions about whether a complaint is dealt with at Tier 1, elevated to Tier 2, or dismissed are made, what complaints will be considered urgent or serious and how they will be handled, and who makes decisions about what Tier 2 processes will be offered;
- consider deadlines for various activities in the process, which can demonstrate your commitment to timely resolution of complaints, provide some certainty to dissatisfied persons, and help to ensure things don't 'fall through the cracks';
- think in advance about how you will deal with a dissatisfied person's unreasonable conduct¹³; you do not need to tolerate unreasonable behaviour, but need to plan for how you will deal with it and include that in your policy;
- create an environment where it's safe to learn and make mistakes and where teams support each other; remember both staff handling complaints and those that are the subject of a complaint will need support¹⁴; ask staff what they need;
- aim for initial complaint handling as close to the service being complained about as possible (including by the person who originally delivered the service); but where early resolution isn't successful, assign the complaint to someone not involved in either the service or initial complaint handling;
- provide training and opportunities for staff to develop and practice their skills in areas like customer service, active listening, having difficult conversations, problem solving and dispute resolution;
- consider building internal structures (e.g., team meetings to work out the bugs, support each other and learn from complaints);
- develop plain language materials/handouts to explain the complaint handling system to both users and staff; consider integrating complaint handling information with public information about how to make a service request, report a problem, or provide feedback, and simplifying the process for each so that people don't need to figure out whether their concern falls within the complaint handling policy;
- above all, stay user-focused.

¹³ BCO describes unreasonable conduct as 'any behaviour that, because of its nature or frequency, raises substantial health, safety, resource or equity issues for an organization' See Resources for links to their Quick Tips Dealing with Unreasonable Conduct and Complaint Handling Guide for more information.

¹⁴ see Resources for links to SPSO Making Complaints Work for Everyone and University of Glasgow's Being Complained About Guidelines to help mitigate the potential for complaints to negatively affect individual employees and organisational performance.

Tips for internal review and resolving complaints

- treat people with respect and dignity, listen to them with an open mind, put yourself in their shoes, and work at understanding their perspective;
- people want to feel listened to – that their views matter – and that you understand;
- ask yourself: What exactly is the dissatisfied person’s complaint(s)? What is the root cause of the complaint? What do they want to achieve by complaining? Can I achieve this, or explain why not? If I cannot respond, who can help?¹⁵;
- try to manage expectations early-on: tell people how their complaint will be handled and articulate the range of possible solutions;
- take time to explain why a decision was made and the process to come to it; people may disagree with the decision, but if they understand what was considered and feel they have been treated fairly, they may be more willing to accept it;
- an apology, sincerely given, can go a long way to resolving a complaint¹⁶;
- for managers: empower and support staff, give them freedom to problem solve, make it clear it’s ok to make a mistake, and help them learn from the experience.

Tips for dispute resolution and investigations

- consider dispute resolution, led by an independent person, if people have become entrenched in their positions, or if there is a lack of trust between the dissatisfied person and the local government;
- investigations are simply objective fact-finding processes to determine what happened and what should have happened, and if there is a difference between the two; investigations can determine whether this is the local government’s responsibility¹⁷;
- investigations need to: be planned in advance¹⁸, conducted fairly, and make sure the decision maker is impartial¹⁹;
- consider impacts on staff who are the subject of the complaint, make sure they are treated fairly and kept informed, and provide support and debriefing opportunities²⁰.

¹⁵ see Resources for a link to SPSO Local Authority Model Complaints Handling Procedure Part 3

¹⁶ see Resources for a link to BCO’s Quick Tips on Apologies

¹⁷ See Resources for a link to SPSO’s Local Authority Model Complaint Handling Procedures Part 3

¹⁸ See Resources for a link to BCO’s Complaint Handling Guide for details

¹⁹ See Resources for a link to BCO’s Quick Tips: Essentials of Procedural Fairness

²⁰ See Resources for a link to BCO’s Complaint Handling Guide for details, along with University of Glasgow/Hirstworks Being Complained About, which provides guidelines for avoiding potentially negative effects of complaints on employees

Tips for learning from complaints and evaluating your complaint handling system

- consider process and outcomes for individual complaints: start with self-reflection by those handling the complaint, and if applicable those that were the subject of it;
- support staff by providing opportunities to debrief; boost learning by creating a safe environment to talk about complaints and service improvements as a group;
- when something has gone wrong, or an error made, think about how to avoid it in the future by considering: people (e.g., staff reminders, training); policies (e.g., are policies lacking or need to be amended?) and systems (e.g., do processes need updating?; is there a need for automation?; should old forms be replaced?);
- look at trends over time. If you are getting a high volume of complaints about a particular service or process, do you need to deliver it in a different way? Is there a need to provide new procedures or enhance communications around it?;
- when evaluating the system, try and think beyond how many complaints and how quick the response. Instead develop indicators around the quality of the outcome too (see [My Expectations graphic](#) on page 16 for some ideas for indicators);
- follow-up with complainants afterwards to ask about their experience, and what you could do better; consider user surveys to better understand the user experience;
- consider how you will keep your Council or Board and community members informed about complaints and their outcomes (e.g., annual complaint report);
- don't forget to document service improvements made as a result of complaints, and celebrate those successes.

Case Example: Using complaints to think outside the box

Solid waste can generate a high volume of complaints, which can be a catalyst for meaningful service improvements.

- If you report a missed collection to one BC municipality, they send someone around for it later that day. The problem is solved with no fuss: the community member feels like the municipality went out of its way to provide great service, and there was no need for the municipality to figure out if the customer had their bin out in time or check the truck's GPS to see if it was where it was supposed to be. The municipality weighed the financial cost of sending a little truck to pick up the missed garbage, against the relationship cost of investigating what happened, assigning blame, not fixing the problem, and losing the opportunity to build trust.
- A community member in one BC regional district complained that the high minimum charge at the landfill for drywall that might contain asbestos was acting as a disincentive to properly dispose of it. The pricing was a Board decision, and as is the case in many BC local governments, the complaint about the merits of that decision was directed to the Board. While the price was intended to reflect the additional cost of dealing with a contaminated product, the Board learned from the complaint that a change in its pricing structure to reduce the minimum charge could better serve community needs. Reducing the minimum charge wasn't significant financially, but it did have significant environmental and community trust benefits.

Not all BC local governments could afford that solution, but other lower-cost solutions may go a long way to resolving the problem (e.g., email subscriptions that remind people when it's waste collection day).





Model Complaint Handling Documents

In this section we provide three model documents to support you in the design and implementation of your complaint handling system. These documents include: a model policy, model procedures, and a sample complaint system user guide. All of these are intended to be adapted to suit your local government needs.

DRAFT




Introduction and key choices

Introduction

The Model Policy (beginning on page 30) and the Model Procedures (beginning on page 36) set out the various elements of an effective complaint handling system, with sample text that could be used by local governments in BC. The text is intended to be adapted to meet your particular needs and your format for policies and procedures. The grey square-bracketed text shows where information must be filled in and text in grey boxes indicate optional content. Sidebar Information and Tips boxes are informational only and not intended to be included in your policy and procedures.

Key choices in developing a complaint handling policy and procedures

There is currently no legislated requirement for BC local governments to handle complaints in a particular way, although as with all actions and decisions, complaint handling must ensure fair process. When developing your policy and procedures, there are three key choices that you will need to address:

-  who can make a complaint and how;
-  what types of complaints will be dealt with under the policy; and
-  who will carry out the complaint handling functions.

This section provides details about each of these choices. **Provisions in the models that follow (see pp. 30-40) may need to be changed to accommodate the choices you make in these areas, as well as choices relating to other topics discussed in the annotations within both models.**

Who can make a complaint and how (*policy s.5; procedures s.2*)

Leading practice: Provide easy access to the complaint system to a broad range of people through multiple channels; provide support and/or other mechanisms to ensure the complaint process is accessible to vulnerable persons or those who may be reluctant or unable to complain.

The model policy takes a broad approach to who may complain (i.e., any individual, business, organization or group, except for staff and elected officials). Local governments may also wish to consider ways to improve access where a dissatisfied person is reluctant or unable to make a complaint. The model policy and procedures provide the following for your consideration:

- **complaints may be made by a representative of a dissatisfied person:** (e.g., friend, relative or advisor). If you provide this, also think about how you will ensure the representative is authorized to act on the dissatisfied person's behalf, and whether there are alternatives you would consider if written authorization is a barrier;

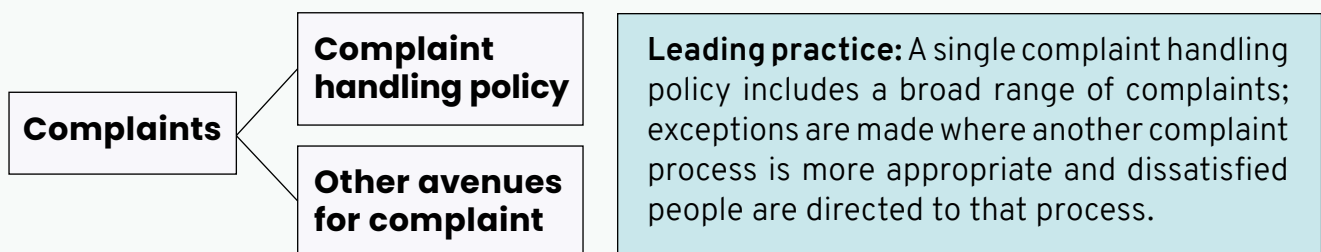
- **anonymous complaints are accepted, so long as they contain enough information to allow them to be reviewed:** Doing so may raise concerns that this encourages people to make unsubstantiated allegations and that this will increase complaint volume. In addition to limiting anonymous complaints to those that can be reviewed, the models provide for dismissal of complaints that make allegations that lack substantive evidence. These measures should ease administrative burden while allowing better access for people who may not wish to leave their name, perhaps out of fear of retaliation and/or because they lack trust in the local government’s ability to maintain confidentiality (e.g., a trans-gender individual wanting to complain about the lack of universal washrooms at the recreation facility);

- **staff will help to record a complaint if needed:** Think about providing this, as well as other ways to offer support (e.g., translation services). Also consider complaint forms, which can be a good way to ensure all relevant information is captured, but may be a barrier for some. The models provide for non-mandatory complaint forms.

The model procedures include a place to insert information about how complaints will be received (e.g., by telephone, in person, online). Community members will have different preferences, so consider providing as many access points as are manageable.

Given the prevalent use of media, and especially social media to express dissatisfaction, it is worthwhile considering how you will deal with complaints expressed there. It can be difficult to determine if a post is a complaint or an expression of an opinion; and if you do decide a post is a complaint, responding to it via social media could be challenging given the complaint confidentiality requirements. If you include social media as a way you will receive complaints, consider including specific procedures related to their response (e.g., that you will follow-up on the complaint offline). If you are not including social media as a way you will receive complaints, consider the model procedures’ section 2 optional content to provide some clarity around how you will deal with these complaints. You may also want to consider alternative means to address complaints or concerns expressed via social media, such as correcting misinformation, providing responses, or seeking out those expressing dissatisfaction to get further information about their concerns jump to [tips for responsive governance](#) for more information.

? What complaints will be dealt with under the policy and what will be excluded (policy s.6)



From a community member's perspective one policy that applies to all complaints is best, as it avoids confusion about which policy, if any, applies to their complaint. However, there will likely be some types of complaints that are more appropriately dealt with through other avenues. If so, consider excluding the complaint type from the general complaint handling policy and directing community members to the more appropriate complaint process.

The model policy broadly defines complaint (i.e., dissatisfaction with any of our programs, service or people where a response is implicitly or explicitly expected) and then specifically excludes both service requests (which are stated not to be complaints) and certain types of complaints for which other avenues of complaint are more appropriate (e.g., policing). Everything else falling within the broad definition would be included. Two categories of complaints that warrant consideration for exclusion from your complaint handling policy are:

Complaints about the decisions or conduct of elected officials²¹

- **The merits of a council or board decision:** Elected officials are responsible for governing and are held accountable for the merits of their decisions through the electoral process. Many complaint handling systems include complaints about the process to come to a decision (e.g., were all the statutory rules followed, was the process fair, etc.), but exclude the merits of the decision itself. Those who wish to complain about the merits of the decision could instead be referred to ways they can communicate with their elected officials.

- **Elected official conduct:** A council or board is responsible for managing its own behavior and conduct. Where standards of conduct for elected officials are in place (e.g., Code of Conduct) and these provide for complaints from the public, dissatisfied people would be directed to the code of conduct complaint process. Where either the code of conduct does not allow for public complaints or no code of conduct is in place, dissatisfied people could be directed to the council or board.

Complaints for which there is an established customized complaint handling process, that is fair, accessible and effective

Some types of complaints are already dealt with through a well-established process designed for the specific complaint type. Local governments may want to exclude those complaints from their general complaint handling policy, and direct dissatisfied people to the existing process. Specifically, you may wish to consider excluding:

- **Complaints raised by employees and recruitment complaints:** Unless employees are complaining as a member of the public about a local government service they receive, their complaints are typically excluded from complaint handling policies. Employee complaints are better suited to customized processes in employment contracts, union agreements, human resource policies, or whistleblower policies that can provide specialized protection for those who raise concerns.

- **Policing matters:** Policing concerns are more appropriately dealt with through established independent police oversight bodies, and dissatisfied persons should be directed to these complaint processes.

²¹ For practical strategies to prevent conduct issues with elected officials in local government, and ways to deal with them should they arise, see a 2022 document [Forging the Path to Responsible Conduct in Your Local Government](#) as well as the Government of BC web page [Responsible conduct of locally elected officials](#)

- **Bylaw enforcement complaints or concerns:** [BCO's Bylaw Enforcement: Best Practices Guide](#) sets out best practices for dealing with complaints about possible bylaw violations, including developing a complaint policy for these. It also sets out best practices for investigations and taking enforcement action, including setting up review and appeal processes for enforcement actions. If you have established bylaw enforcement policies and review and appeal processes, consider excluding bylaw enforcement matters from your general complaint handling policy. Also consider whether your bylaw enforcement policy provides for complaints about how the bylaw service is provided, including inadequate quality or standard of service, and/or the conduct of staff delivering the service, and if it doesn't, include these types of complaints under your complaint handling policy.

- **Services provided on behalf of the local government and/or governed by an external agency (e.g., contracted services, P3, business enterprises, boards and commissions):** Where services are governed or delivered by entities outside of core local government, consider whether related complaints will be addressed by the local government or the entity delivering/governing the service. Consider collaborating with the contractor/agency to agree on an approach in keeping with the principles you establish in your complaint handling policy (e.g., accessible, fair, person-focused and responsive). If complaints will be addressed by the outside organization, you may also wish to consider whether or not to build in an appeal or review of the complaint by the local government if the dissatisfied person remains dissatisfied at the conclusion of the outside agency's complaint process.



Who will carry out what complaint handling functions (*policy s.7; procedures s.3-5*)

The models provide a two-tier system with complaints dealt with by 'point of service staff' at Tier 1 and by 'management staff or third parties' at Tier 2. If you choose to provide a two-tier system, these generic terms could be replaced by naming specific positions that will undertake those functions.

The intention of the approach in the models is for most complaints to be dealt with in Tier 1 as soon as possible and as close to the original service that brought about the complaint as possible, including by the same person who provided the service or made the decision that is the subject of the complaint. Tier 2 serves as an internal appeal process, and as such, independence from the original service/decision is expected. At Tier 2, the review, investigation or dispute resolution should be undertaken by an unbiased person, ideally someone who was not involved in the original service/decision or the Tier 1 process. The inclusion of 'third parties' in the sample wording is intended to cover off rare circumstances, most likely to occur in very small local governments, where all staff would be seen as biased.

The models show only one internal review of staff actions/decisions: Tier 1 decisions are reviewed when the complaint is elevated to Tier 2. Depending on your circumstances you may wish to provide additional oversight steps (e.g. prior to making dismissal decisions at Tier 1 and/or after a Tier 2 review of the complaint).

Model local government complaint handling policy

(1) Purpose

The purpose of this policy is to ensure we provide fair, effective and transparent responses to concerns raised by the public, which will help us provide better services, improve relationships with our community members and enhance public perception of [municipality or regional district].

This policy describes our broad approach to responding to complaints, and the related procedures set out in more detail how we will receive, review, record and respond to complaints, keeping community members at the heart of the process, while enabling us to improve our services by learning from complaints.

(2) Guiding principles

[Insert LG name] is committed to high standards of practice in our work. We value community engagement and welcome concerns and complaints from community members, as this supports our efforts toward continuous improvement of our service delivery and operations. Our complaints handling process is guided by the following principles:

- **Accessible:** We provide information about our complaints process on our website and in print, and accept complaints in a variety of ways.
- **Fair:** complaints will be considered on their merits and handled in a manner that is impartial and fair. We are committed to fair process and keeping people informed of the progress of their complaint.
- **Person-Focused:** We commit to listen to the dissatisfied person's concerns, treat them with dignity and respect, and maintain appropriate confidentiality throughout the complaints process.
- **Responsive:** Complaints will be acknowledged, responded to quickly and, where possible, resolved without the need for a formal investigation. Where a complaint cannot be resolved at first contact, we will forward it for further review or investigation promptly, and work towards a final determination as quickly as possible.

(3) Our commitment to community members

Unless action is undertaken immediately to resolve the complaint, we will strive to acknowledge a complaint falling within the scope of this policy within [xx] business days of its receipt. Where possible, an initial assessment of the complaint will be undertaken within that same period and assessment decisions communicated to the dissatisfied person at the same time as receipt of the complaint is acknowledged.

Tip: As the Complaint Handling Policy is a commitment of the local government to the community it should be adopted by resolution of the council or board. You may wish to include a clause that specifically authorizes the CAO (or other staff position) to create, maintain and amend related procedures in accordance with the policy. This enables staff to create appropriate procedures and to keep them current without requiring repeated adoptions at the council or board level.

Information about Purpose and Guiding principles: Describe the purpose of the policy and the principles that underpin it. The principles stated here are consistent with those proposed by BC Ombudsperson (BCO) in their complaint handling guide. They may be modified to suit your needs.

Information about Our commitment to community members: Provide a clear statement of what community members can expect in response to their complaints. It is good practice to commit to timelines within which complaints will be handled. The sample wording suggests one timeline – acknowledgement of the complaint – and provides a space to set out the number of days. This would ideally be a short time frame (e.g., 2 or 3 business days). Additional timeframes could also be included, such as deadlines for: assessments, early resolution, acknowledgement at Tier 2, review,

We will try to reach agreement with the dissatisfied person about what action (if any) will be taken to resolve the complaint, although we acknowledge that this will not be possible in all cases. If we are unable to achieve early resolution of the complaint, we will keep the dissatisfied person informed of the process we will use to make a final determination on the complaint, including the timeline anticipated for its conclusion.

If we have made an error in providing our services we will take steps to fix the problem, which may include things like: acknowledgement and apology for the error, error correction where this is possible, reconsideration of a previous decision where appropriate, expediting an action, waiving a fee or penalty, issuing a refund, or changing our policies and procedures to prevent re-occurrence.

(4) Definitions

Complaint: An expression of dissatisfaction with any aspect of our programs, services or people where a response is explicitly or implicitly expected, which will be addressed in keeping with this policy unless specifically excluded under section 6.

Dissatisfied person: Someone who has made a complaint under section 5, and includes the representative of that person.

Anonymous complaint: An expression of dissatisfaction meeting the definition of complaint that does not identify the name and/or contact information of the dissatisfied person.

(5) Who can make a complaint, and how?

Any individual, business, organization or group may make a complaint under this policy, except for our employees and [council or board members]. For clarity, where an employee also receives a service from the [municipality or regional district] as a member of the public, they may complain about that service.

We also accept complaints:

- from a representative (e.g., friend, relative, advocate, advisor) of a dissatisfied person, so long as we are assured that the dissatisfied person has authorized the representative to act on their behalf; and
- that are anonymous complaints, providing they include sufficient information to allow us to make further inquiries.

If a complaint is submitted to a member of council or board the complaint will be delivered to [insert either 'staff', or name a specific staff position, such as Corporate Officer or Chief Administrative Officer] and addressed in the same way, with the same priority, and in same timeframes as other complaints received.

alternate dispute resolution, investigations, final communications. If considering these deadlines, keep in mind that it will be important to be able to consistently meet them. You may also want to provide some ability to extend timelines in certain circumstances (e.g., where a complaint is particularly complex; for cases where dispute resolution is offered).

Tip: This provides examples of the types of remedies that may be available to resolve a complaint. They are intended to help manage public expectations around potential remedies, and could be modified to meet your needs or to provide examples that you feel would particularly resonate with community members. Alternatively, you may wish to remove them entirely if you feel they serve to raise expectations rather than manage them.

Information about Definitions: Definitions can be gathered together in one place for convenience, and you may wish to add your own

Information about who can make a complaint and how: Define who can make a complaint, if there are any restrictions on that and address any other special circumstances. See [Key Choices](#) for more information.

Tip: These allow avenues of complaint for those who may be reluctant or unable to complain; See [Key Choices](#) for more information. If you choose to accept anonymous complaints you can still operationally encourage people to leave their names and contact information so that you can discuss details of the complaint further with them and keep them informed of progress on the complaint, but if they are reluctant to do so, you would accept the complaint anonymously and assess it to determine if you had enough information with which to follow-up.

Tip: This provides assurance that all complaints will be dealt with fairly, and that those going to elected officials will not be given preferential or priority treatment

(6) Complaints

Complaints submitted by those identified under section 5 and in keeping with the Complaint Handling Procedures will be addressed consistent with this policy, except where they are specifically excluded in this section.

Examples of the types of complaints that will be addressed are:

- failure, refusal or unreasonable delay in providing a service provided by the local government;
- concerns about how a service was provided, including inadequate quality or standard of service;
- an error we have made;
- failure to follow appropriate process in delivering a service or making a decision;
- concerns about the conduct of a member of our staff.

Service requests not considered complaints

Service requests include:

- a first-time notification of a repair or maintenance issue related to our services or facilities (e.g., streetlight out, washrooms need cleaning, pothole to be filled)
- a first-time request for service (e.g., requesting a water connection, requesting a business licence, registering for a recreation program);
- asking questions, requesting explanations or information, including information requests under the *Freedom of Information and Protection of Privacy Act*.

We will address these through our regular service request processes.

Types of complaints that will not be addressed under this policy

Optional content

The following types of complaints will not be addressed under this policy, as they are dealt with by separate processes, as identified:

Complaint type	Complaints may be made
The merits of a decision of council or board or a committee of council or board	In writing to the [Mayor and Council or Chair and Board]
The conduct of a member of council or board or a committee of council or board	[Choose which applies; either 'in accordance with our Code of Conduct' [or equivalent policy] OR 'in writing to the council or board']

Information about Complaints:

Define what is considered a complaint and set out which complaints will be dealt with under the policy. The sample wording describes service requests and states that these are not considered complaints as they are dealt with through regular service request processes. This is proposed because it may be more efficient to address these outside of the complaint handling policy. If you wish to handle these as complaints, you could remove that clause. Go to [Key Choices](#) for further information on the types of complaints you may wish to consider excluding from your complaints handling policy. Where a complaint type is excluded, provide information about alternative complaints processes.

Tip: This shows examples of the types of complaints that would fall under the policy, and it can be included in the policy to show community members some concrete examples of the kinds of things that are dealt with. The list may be modified to meet your needs or to provide examples which you feel would particularly resonate with community members.

Tip: Service requests are often not considered complaints because they can be dealt with more efficiently outside the complaint handling system. If you are excluding them from your complaint handling, ensure you let community members know what process you do use for these types of requests (e.g., how they can make a service request and how that will be dealt with).

Tip: This sets out complaint types that are excluded from your complaint handling process because there is another avenue for complaint more appropriate for that complaint type. You will likely have specific complaint types you need to exclude (e.g., policing) as well as those you wish to exclude and refer community members to other ways they may complain about these matters. See [Key Choices](#) for more information. The types of complaints to exclude will depend on your circumstances. Optional content shows those referred to in Key Choices; the choice of whether or not to exclude these is yours. You may also choose to exclude others that are not mentioned.

Complaint type (continued)	Complaints may be made (cont.)
Complaints or concerns raised internally by a member of staff, or staff recruitment complaints	[Name the process within your organization that deals with these matters (e.g., human resource and /or union agreements or employment contracts)]
Complaints about police services	[Name the process through which complaints may be made (this will depend on whether the service is delivered by a municipal police force or RCMP)]
Bylaw enforcement complaints or concerns	In accordance with [specify the bylaw/policy name]
Complaints in relation to [name the service] which is operated or governed on behalf of the local government by [name the entity]	In accordance with [name the other entity's policy, if applicable; or provide contact information]
[Any others you consider appropriate to exclude]	[Identify alternative complaint handling mechanism for each]

Leading practice: where a complaint is to be excluded, identify where dissatisfied people can complain.

Specific circumstances where a complaint will not be addressed under this policy

Unless we think there are significant extenuating circumstances, we will not address complaints under this policy if the complaint is:

- received more than [xx] months after the incident cited in the complaint occurred or more than [xx] months after the dissatisfied person became aware of it;
- an attempt to reopen a previously concluded complaint, where no new information has been provided;
- about a matter:
 - that is before a court, tribunal or statutory decision-making body,
 - that has already been heard and determined by one of these, or
 - if notice has been received that the matter has been referred to one of these;
- regarding a subject matter for which we have provided notice to the dissatisfied person under section 11 (dealing with unreasonable conduct) that we will not respond; or
- delivered in such a way that it violates [our respectful workplace policy; or insert the appropriate policy name].

Tip: This sets out specific circumstances in which a complaint will not be addressed unless the local government considers there are extenuating circumstances which would make consideration of the complaint appropriate.

Tip: It is typical to put some timelimit on when complaints may be made. In setting the date, consider both that complaints get more difficult to review/ investigate the longer the person waits to complain, and that people sometimes need to take time to consider whether or not to complain. Complaint policies will vary; appropriate deadlines are likely in the 6 months to 1-year range. You can state the deadline as either of both of those indicated; if using both, they should be the same.

(7) How we will address complaints we receive

We commit to maintaining confidentiality and protecting privacy throughout the complaints process in accordance with the Freedom of Information and Protection of Privacy Act. Where possible, complaints will be addressed when we first learn of the issue, and where appropriate we will take immediate action to resolve the problem, and let the dissatisfied person know that we have done that.

Where immediate action is not possible, the complaint will be addressed internally through the following two-tier process:

- **Tier 1 (*Point of Service*):** Complaints are recorded, acknowledged and assessed to determine if they are suitable for attempts at early resolution, should proceed directly to Tier 2, or be dismissed and closed in accordance with criteria established under the Procedures. Where suitable, point of service staff will work with the dissatisfied person to try and reach agreement on what (if any) actions will be taken to reach an appropriate resolution. If resolution is not reached, the dissatisfied person may request the complaint be dealt with at Tier 2. Complaints are closed when early resolution is reached, or where early resolution is not reached and the dissatisfied person does not request the complaint be dealt with at Tier 2; and

- **Tier 2 (*Internal review, dispute resolution or investigation*):** More serious, complex or sensitive issues, or at the request of the dissatisfied person, complaints not resolved at Tier 1, will be dealt with by management staff or third parties through one or more of:

- an internal review of the Tier 1 decisions/actions;
- dispute resolution, including facilitated discussions and/or mediation;
- an investigation to explore the complaint in more depth and establish all the relevant facts. Complaint investigations will be guided by the principles of administrative fairness and will be conducted in a fair, timely and impartial manner. The aim is to resolve the complaint where possible or to give the dissatisfied person a full, objective and proportionate response that represents our final position. Complaints are closed when they are dismissed, resolved, or a final determination on the complaint at the conclusion of the Tier 2 process is made.

In addition to providing information to the dissatisfied person about our complaint handling process and the actions and decisions we make, we will, where possible, advise them of available external review or appeal process.

Information about how we will address complaints we receive:

Provide a confidentiality statement to indicate to dissatisfied people that their complaint will be handled confidentially.

If you plan to deal with complaints that can be resolved immediately differently than other complaints, you may provide for this here. The sample wording provides that where a complaint can be handled right away, it can be managed in the same way as service requests (i.e., if the problem is fixed on the spot, it doesn't move into the two-tier complaint process with various notifications, reviews, etc. This could be a reasonable approach for smaller jurisdictions concerned about the practicalities of tracking and evaluating what could be a high volume of concerns that they have already dealt with.

Describe at a high-level the objectives, actions and possible results of each of the two-tiers in your process. Sample wording focuses Tier 1 on attempts at early resolution and Tier 2 on a review of Tier 1 decisions, further attempts at resolution (including facilitated discussions and investigations).

Tip: Available external review or appeal processes will vary depending on the nature of the complaint, and you will want to identify all avenues that you are aware of that are applicable to the complaint (e.g., BC Office of the Ombudsperson; Office of the Information and Privacy Commissioner of BC; BC Human Rights Tribunal; Judicial Review). Note that these external reviews are cited in the BCO Complaint Handling Guide as 'Tier 3 – Complaints Needing External Review'. Since this model policy is written from a local government perspective (e.g., 'the complaint will be addressed internally through the following two-step process...' it does not label external reviews as 'tier 3'; this is not meant to diminish the importance of communicating with dissatisfied persons about the availability of external reviews, and local governments will want to ensure that they take all reasonable measures to communicate with dissatisfied persons about what other review or appeal mechanisms are available to them for their complaint. See also the [Sample Complaint System User Guide](#) in which some of the key external reviews are identified and web-links to each provided.

(8) Continuous quality improvement

We will monitor complaint trends and conduct regular reviews to identify any systemic service issues and make necessary improvements to our organization. We are committed to learning from the complaints we review.

(9) Dealing with unreasonable conduct

We commit to respond fairly to complaints and treat people with dignity and respect throughout the complaint handling process. We expect that people making complaints will treat our staff reasonably. In cases where a dissatisfied person becomes unreasonable in their interactions with our staff that creates health, safety, resource or equity issues for our organization, we will take steps to address the behaviour.

We have a responsibility to keep our employees safe at work. We will not tolerate the threat or use of physical violence. We will take steps to address behaviour that is argumentative, aggressive, abusive or offensive, or that contravenes our policies, such as [insert name of applicable policy e.g., respectful workplace policy] or any legislated health and safety standard, such as those set by WorkSafe BC.

We have a responsibility to use the resources we have fairly. Where dealing with complaints from a dissatisfied person becomes a disproportionate use of staff resources, and impacts our ability to provide services or deal with other people's complaints, we will take steps to reduce the resources allocated to those complaints to a level that is proportionate and fair. For example, we consider the following to be unreasonable:

- persistent and unreasonable demands being placed on staff (e.g., repetitive submissions of large or irrelevant volumes of paperwork and communications);
- lack of cooperation with staff's efforts to resolve a complaint (e.g., not responding to our requests for further information); and
- use of the complaints system such that the effect of repeated complaints is to harass, or prevent us from pursuing a legitimate aim or implementing a legitimate decision.

We will advise what action we are taking and why, and whenever possible we will give the dissatisfied person the opportunity to change their behaviour before a decision is taken. We will advise how long the restriction is in place, how to request a review of the restriction and what is required for the restriction to be lifted.

Information about continuous quality improvement: Learning from complaints and making servicing and operational improvements as a result of complaints is a key element of an effective complaint handling system. Sample language is taken directly from BCO complaints handling guide, you may wish to expand on that to demonstrate your commitment to learning from complaints.

Information about dealing with unreasonable conduct: Set out how you will deal with situations in which a dissatisfied person becomes unreasonable in their interactions with staff. Unreasonable conduct has two dimensions:

- health and safety issues (e.g., violence, abusive or offensive behaviour, bullying and harassment); and
- resource or equity issues (e.g., complaints from one individual are a disproportionate use of staff resources)

Tip: BCO and Scottish Public Service Ombudsman resources for how to deal with unreasonable conduct will be useful as you develop this section of your policy. See [Resources](#) section for links to these resources.

Model local government complaint handling procedures

(1) Authorization to amend and definitions

This Complaint Handling Procedures outlines the procedures – steps, methods, timing and personnel – that [LG Name] staff will use for implementing the [LG Name] Complaint Handling Policy (the Policy). The [LG Name] Chief Administrative Officer is authorized to maintain and amend these procedures from time to time in accordance with the Policy, to ensure they remain current and effective.

For the purposes of these procedures, a complaint is an expression of dissatisfaction with any aspect of our programs, services or people where a response is explicitly or implicitly expected, that is submitted in keeping with section 5 of the Policy and section 2 of these procedures, and that is within the scope of complaints that will be dealt with consistent with the Policy, as described by section 6 of the Policy.

(2) How complaints can be made *(Complaints Handling Policy, section 5)*

Complaints may be made verbally or in writing, and submitted to us in the following ways: [insert what methods you will use (e.g., online, email, in-person, telephone, mail, and provides applicable addresses, phone numbers, web links etc. for each]

Optional content

We are unable to accept or respond to a complaint issue raised on a third-party media platform, including social media, such as Twitter or Facebook.

However, where a complaint issue is raised on a media platform which we manage and control, we will make best efforts to use that platform to explain that we don't take complaints via media and tell the person how they can complain.

We provide a complaint form [insert where they will be available e.g., 'on our website and in print form'], which we encourage a dissatisfied person to use to ensure all details of the complaint are documented. However, there is no requirement for the dissatisfied person to submit their complaint in that form.

Where needed, our staff can assist in recording a complaint, and if a complaint is made verbally, we will make a record of the key points of the complaint raised.

Information about How complaints can be made:

Describe how a person may complain, including information about where that complaint may be sent. See [Key Choices](#) for more information.

Tip: Given the prevalent use of social media to express dissatisfaction, you may wish to provide a statement that you do not consider these to be complaints under your policy. The statement that you will make best efforts to explain how people can complain shows the public that you are open to receiving their complaints; in considering whether or not to include this, consider whether you have the capacity to respond in this way consistently. See [Key Choices](#) for more information.

Tip: This provides better access to the complaint system for those who may be unable or unwilling to complete the form. Where forms are not used, you may need to clarify what information is needed in order to allow you to follow-up on the complaint.

(3) Tier 1 Process: Point of Service (*Complaints Handling Policy section 7*)

Recording complaints: The details of the complaint, including the contact information of the dissatisfied person (where available), will be recorded in a confidential information management system. Those records will be updated throughout the process to document details of how the complaint was dealt with and its outcomes.

Acknowledging complaints: Except if the complaint is an anonymous complaint, we will strive to acknowledge it within [xx] business days through the dissatisfied person's preferred method of communication, if they have indicated this. That communication will include the name and contact information of the staff person who has primary responsibility for handling the complaint, as well as information about our complaints process and anticipated timeframes, and where possible, information about available external review or appeal processes.

Where it is evident that a complaint is part of an organized campaign (e.g., where all complaints have identical content or are in a 'form' letter), we may acknowledge the complaints using a single 'form' letter, and if the organizer of the campaign is known to us, we may ask them to nominate a single person to make a single complaint on behalf of the group so that any follow-up on the complaint will be through this individual.

Assessing complaints: Point of service staff will conduct a preliminary assessment to determine if the complaint is suitable for attempts at Early Resolution, if it should proceed directly to Tier 2, or if it should be dismissed.

Dismissing complaints: Point of service staff may dismiss a complaint under the following circumstances:

- the complaint is anonymous and does not provide sufficient information for us to make further inquiries;
- the complaint is excluded under section 6 of the Policy unless there are significant extenuating circumstances, and we don't consider the circumstances warrant addressing the complaint;
- the complaint appears vexatious, is abusive to staff, or contains allegations that lack substantive evidence; or
- the complaint is about a matter for which there is a statutory right of appeal, review or reconsideration.

If a complaint is dismissed, the dissatisfied person will be notified and provided with the reasons for the dismissal and, where possible, they will be advised of available external review or appeal processes. This notice may be combined with notice acknowledging receipt of the complaint. This procedure does not apply to anonymous complaints.

Information about Tier 1: Point of Service: Describe how you will record, acknowledge, assess and attempt to resolve complaints. Initial assessment of complaints is a way of 'triaging' them to determine which are suitable for early resolution, which should be elevated immediately to Tier 2, and which should be dismissed without further consideration. For clarity, describe the reasons a complaint may be dismissed.

Tip: Provisions relating to dismissing complaints is written as a discretionary authority, so staff can look at the specific circumstances of individual complaints under each of these categories and decide whether or not to address or dismiss the complaint.

Tip: Some statutory rights of appeal or review may be inaccessible to some (e.g., Court-based process), so you may wish to consider addressing these through your complaints process where it makes sense to do so. There may be advantages to both the local government and the dissatisfied person to attempt to resolve these issues through your complaint system, particularly if there is the potential to avoid lengthy, and potentially costly, Court actions. The ability to dismiss these complaints is provided for in both Tier 1 and Tier 2 processes. Given this, you may wish to consider including these types of complaints at Tier 1 and should that prove ineffective reassessing the matter at the beginning of Tier 2 to see if further attempts at resolution could be fruitful or whether it is more appropriate at that point to dismiss the complaint and direct the dissatisfied person to the statutory process.

Early resolution: The [point of service staff] member who has primary responsibility for handling the complaint will work with the dissatisfied person to try to reach agreement on what action (if any) will be taken to reach an appropriate resolution. Where early resolution is reached, the complaint is closed. Where early resolution is not reached, the complaint may, at the request of the dissatisfied person, be dealt with in Tier 2. If that is not requested, the complaint is closed.

(4) Tier 2 Process: Internal review, dispute resolution or investigation (*Complaint Handling Policy section 7*)

Acknowledging complaints: We will acknowledge our receipt of a complaint at Tier 2 through the dissatisfied person's preferred method of communication, and that acknowledgement will include the name and contact information of the person responsible for conducting the review, and information about the tier 2 process including the timeline anticipated for its completion.

Review of complaint and/or tier 1 decision: The person responsible for conducting the tier 2 process for the complaint will review the complaint and, if the complaint had been considered for early resolution in tier 1, the process and outcomes of that, and will work with the dissatisfied person to:

- ensure both the [municipality or regional district] and the dissatisfied person have a shared understanding of the points of the complaint and the outcome sought;
- determine if there is agreement on some elements of the complaint and relevant facts, and determine what elements and/or relevant facts are in dispute;
- establish a clear understanding of the range of possible outcomes, and
- try and reach agreement on what action (if any) will be taken to reach an appropriate resolution.

The dissatisfied person will have an opportunity to be heard, to provide more information, and to see and respond to other information being considered during the review process and/or before a review decision is made.

Possible outcomes of a review include:

- the complaint is dismissed (under the same criteria as set out in Tier 1) and closed;
- the complaint is resolved and closed;
- further opportunities for resolution are offered and if these are successful the complaint is closed;
- if there is agreement on all relevant facts, and the complaint is not resolved, a final determination on the complaint is made and the complaint is closed; or

Information about Tier 2: Internal review, dispute resolution or investigation: Describe your process for how complaints will be dealt with in tier 2, including under what circumstances investigations will occur and how they will be conducted, and whether or not you will offer dispute resolution and if so, under what circumstances. The sample model policy wording indicates that tier 2 is applicable for 'more serious, complex or sensitive issues', and the procedures could expand on that to provide greater specificity, or examples of the types of matters this would include. The sample wording provides details of how investigations will be conducted and specific requirements for communications with the dissatisfied person, which you may want to modify to meet your particular needs.

Tip: This provides the ability to dismiss a complaint on the same basis as are available at tier 1. See notes alongside the tier 1 dismissal clause for more information.

- the complaint is investigated and a final determination on the complaint is made and the complaint closed.

Notifying staff members involved: If the complaint is about the actions of a staff member(s) we will notify those involved and will share the complaint information with them (unless there are compelling reasons not to), advise them of how the complaint will be handled, provide them with an opportunity to respond to the complaint, advise them of how they will be kept updated and how we will share the complaint response with them. We will also discuss their willingness to engage in dispute resolution approaches where applicable, and provide them with information about who can provide support and information on what to expect from the complaint process.

Further opportunities for resolution

We may offer a dispute resolution approach such as facilitated discussions, conciliation or mediation to try and resolve some or all of the complaint, or for any other reason we think appropriate (e.g., if we are unable to come to a shared understanding of the points of the complaint or the outcomes sought). Dispute resolution approaches may help both us and the dissatisfied person understand the cause of the complaint and will be undertaken only if all affected parties agree, including the dissatisfied person and, if the complaint is about the actions of a particular staff member, that person.

Investigation

The person investigating will plan the investigation before beginning, and will consider what information they have and what they need about:

- what happened;
- what should have happened; and
- whether there a difference between what happened and what should have happened, and if it is the local government's responsibility.

Where information is not readily available, we will balance the need for the information against the resources required to obtain it, considering the seriousness of the issue.

We will keep the dissatisfied person informed during the investigation, and provide an opportunity for them to be heard and comment on any preliminary findings prior to concluding the complaint.

Final determination on the complaint

Unless a complaint is dismissed or resolved, there must be a final determination on it before it is closed. The final determination is communicated in clear and accessible language to the dissatisfied person, and will include:

- information about the issues raised and the agreed facts or findings of the investigation in relation to those issues;

- information about what decision has been reached, an apology where appropriate, information about any action taken, or to be taken, in response to the complaint, and information about any areas of disagreement and an explanation of why no further action can be taken;
- the name of a member of staff that is available to clarify any aspect of the communication; and
- where possible, information about relevant review or appeal options.

(5) Actions to deal with unreasonable conduct (*Complaints Handling Policy section 9*)

We will try to ensure that action we take is the minimum required to solve the problem, considering relevant personal circumstances including the seriousness of the complaint and the needs of the individual. The types of action we may take include:

- Staff are authorized to end in-person or telephone discussions if they consider the person aggressive, abusive or offensive if the behaviour continues after they tell the person their behaviour is unacceptable;
- If there is a threat or use of physical violence we will disengage immediately and may refer the matter to the police;
- We will not respond to correspondence that contains statements that are abusive to staff or contain allegations that lack substantive evidence;
- As a last resort, we may restrict access to our staff, facilities and services, including such things as: limiting contact to telephone calls at set times on set days or by appointment; restricting contact to a nominated member of our staff; limiting the subject matter we will respond to; returning irrelevant documents without review; when we consider continued correspondence on a wide range of issues to be excessive, we may tell the dissatisfied person that only a certain number of issues will be considered in a given period and ask them to limit or focus their requests accordingly.

Tip: Keep your council or board informed about how you are dealing with unreasonable conduct, especially if you are considering restricting access to services.

User-oriented information

Good complaint handling keeps the needs of users of the complaint system at the forefront and ensures that the system is easily understood and accessible to all community members. Providing plain language information on complaint handling can help explain those systems to community members and make it easier for them to use the system.

Local governments will want to consider multiple ways to provide information about their complaint handling system to users. Appendix A provides a [Sample Complaint System User Guide](#) intended to show one way that a local government could explain its complaint handling system to community members. It is based on the Model Policy and Procedures, and will need to be modified to suit your needs, particularly if you also modify the [Model Policy](#) or [Model Procedures](#). The User Guide can then become a useful resource to explain the process to both community members and staff, and it could form the basis of a useful handout and web-based resource, particularly if it is integrated with other plain language information about other complaint and service request processes.

You may already have information on your website and/or in print about how to make service requests or various types of complaints. As you are developing materials relating to a new complaint handling policy and procedures, consider developing plain language information about them, integrating that with the information you already provide to community members on making service requests and complaints under other complaint processes (e.g., bylaw enforcement, police services) and making that information easy to find/navigate for users (e.g., accessible from the front page of your web-site and by other means).



Conclusion

Encouraging complaints can initiate a meaningful dialogue between community members and the local government. We recommend a Human Centred Design approach that puts users at the centre of the design process, for optimal effectiveness. Ideally, complaint handling is an extension of a public service focus, where community members are respected and their views are valued inputs into what the community needs and how the local government can meet those needs within their mandate.

Complaints are welcomed because they provide an opportunity to show that people's concerns matter and that the local government is responsive, and because they

provide a learning opportunity and insight into how the local government can improve governance, operations, and service delivery. Handling complaints well demonstrates your commitment to service and helps you build positive relations with community members that can promote public confidence and trust in your local government.

Complaint handling systems that are fair, accessible, person-focused, trauma-informed, and responsive, that meet the needs of community members and that aim for early resolution wherever possible will be most effective in allowing local governments to make the most of the opportunities complaints present.

CAPITALIZING ON COMPLAINT OPPORTUNITIES

BUILD RESPONSIVE GOVERNANCE AND SERVICE REQUEST HANDLING

Meet community needs better and build public confidence by engaging the community before decisions are made, practicing proactive two-way communication, and providing timely, efficient and fair responses to service requests

BUILD A PUBLIC SERVICE FOCUS

Create a culture of public service and respect, welcome community engagement to understand and respond to community needs and enhance citizen-centred service

BUILD A FAIR, EFFECTIVE COMPLAINT HANDLING SYSTEM

Welcome complaints as opportunities to engage positively with community members. Develop a complaint handling policy and related procedures focused on the user that can respond to complaints fairly and promptly and that uses the input received to drive service improvements

Resources

BC Local Government

Responsive governance

[Bowen Island Municipality Equity, Diversity and Inclusion Policy](#)

[Village of Canal Flats, weekly communication in community newsletter](#)

[City of Grand Forks, plain language council meeting highlights](#)

[City of West Kelowna email subscriptions for various news and alerts](#)

[City of Nanaimo: Get Involved Nanaimo](#) (online community engagement platform)

[Fort St. John Communications Policy](#)

[Fort St. John Social Media Policy](#)

Responsive service request handling

[CivicInfoBC Tell the Town app](#)

[City of West Kelowna Customer Service Feedback](#)

[Regional District of Kitimat-Stikine Report an Issue Webpage](#)

[City of Kelowna Services and Requests Webpage](#)

[District of North Vancouver Report a Problem or Request a Service Webpage](#)

Complaint handling

[City of Castlegar Administrative Fairness Policy and Checklist](#)

[Islands Trust Administrative Fairness Complaints Policy](#)

[District of Clearwater Bylaw Enforcement Policy](#)

[Columbia Shuswap Regional District Bylaw Enforcement Policy](#)

[City of Coquitlam Bylaw Enforcement Policy](#)

Examples of local government complaint handling outside BC

[Town of Renfrew, Ontario](#)

[Glasgow City Council, Scotland](#)

[City of Gold Coast, Australia](#)

Complaint handling, bylaw enforcement and fairness resources from BC Ombudsperson (BCO)

[Complaint handling guide: Setting Up Effective Complaint Resolution Systems in Public Organizations](#)

[Bylaw Enforcement: Best Practices Guide for Local Governments](#)

[Fairness in Practice Guide](#)

[The Power of an Apology](#)

[Quick Tips webpage](#) (including tips on: complaint handling, dealing with unreasonable conduct, fairness, apologies and effective communication)

[Fairness Resources webpage](#) (including training and consultation services)

Complaint handling resources from Scottish Public Services Ombudsman (SPSO)

[Model Complaint Handling Procedures](#) (model procedures are presented by sector; scroll down to open the drop-down menu for the local authority model)

[Guidance and Resource Materials webpage](#) (including: alternative complaint resolution, investigation tools and templates, unacceptable actions policy, template letters, information/guidance for elected officials, tools and templates for learning from complaints and making service improvements)

[Making Complaints Work for Everyone](#)

[Why do complaints matter to board members](#)

[The Nuts and Bolts of Setting Up an Ombuds Office Course](#)

Other complaint handling resources

[My expectations for raising concerns and complaints](#) (UK Local Government Ombudsman, Healthwatch, Parliamentary and Health Service Ombudsman)

[Being Complained About](#) (University of Glasgow and Hirstworks), guidance for organisations to help them avoid potentially negative effects of complaints and support employees who have been complained about

[Transforming Complaint Resolution](#) (compiled by a team of researchers and former practitioners committed to improving the functioning of complaint handling systems)

[Design Research Methods](#) (a repository of research methods for design, including tools you can use to help learn what users of your complaint system want).

[Ombudsman New South Wales \(Australia\) webpage](#) (with links to several complaint handling resources for state and local governments)

[Ombudsman Ontario Tips for Municipal Complaint Resolution Policies](#)

Responsive governance resources from other BC agencies

[Small Town P.R. Playbook: Changing Times, Changing Tools](#) (Northern Development Initiative Trust)

[Healthy Community Engagement Action Guide](#) (BC Healthy Communities)

Appendix A: Sample Complaint System User Guide

Got a complaint about us? Let us know.

Here's how

This guide tells you how you can bring concerns and complaints to our attention and what you can expect from us when you do. We value complaints and use information from them to improve our services, so if you've got a concern, please tell us.

What is a complaint and how are they dealt with?

We consider a complaint to be any expression of dissatisfaction with any aspect of our programs, services or people where a response is expected. Complaints will either be dealt with under our Complaint Handling Policy or another process.

This guide is about complaints addressed under our Complaint Handling Policy, such as:

- failure, refusal or unreasonable delay in providing a service provided by the local government;
- how a service was provided, including inadequate quality or standard of service;
- an error we have made;
- failure to follow appropriate process in delivering a service or making a decision;
- concerns about the conduct of a member of our staff.

Other complaints are dealt with by different processes, so this guide does not apply to them. You can access information about these other processes as follows:

- bylaw enforcement complaints are handled under our Bylaw Enforcement Policy [insert contact information/web links]
- police services complaints can be made to [insert name of body, contact information/web links etc.]
- the merits of [council/board] decisions, for which you are invited to write directly to the [Mayor and Council or Chair and Board] at [insert mailing and/or email addresses as applicable]
- the conduct of a member of our Council/Board [name the process for this and include contact information/web links]
- [describe any others that are excluded from your complaint handling policy]

We also deal with the following service requests through a separate process:

- first-time notification of a repair or maintenance issue related to our services or facilities (e.g., streetlight out, washrooms need cleaning, pothole to be filled)
- a first-time request for service (e.g., requesting a water connection, requesting a business licence, registering for a recreation program);

- a question, or a request for explanation or information, including information requests under the *Freedom of Information and Protection of Privacy Act*.

[provide contact information and/or links to your service request process and/or forms]

You can either go directly to these processes, or our staff can assist you in getting your complaint to the right place. Please call us at xxx-xxx-xxxx so we can help.

Here's how our **Complaint Handling Policy** works. The full policy is available at [insert link]

Making a complaint

Anyone can make a complaint, including someone acting on your behalf. We also accept complaints from a business, organization, or group. You need to provide the details of the complaint, what has gone wrong, and what result you are looking for. If you provide your name and contact details, we can work with you to resolve your complaint. We can also accept anonymous complaints if they provide enough information for us to follow-up on them properly. While not required, you may find it convenient to use our Complaint Form [insert link].

Complaints may be made verbally or in writing through one of the following.

Telephone at xxx-xxx-xxxx

In person at [insert info]

Email to [insert info]

Mail to [insert info]

Website [insert link]

Our staff is able to assist you in making your complaint, so please let us know how we can help.

Are there any restrictions on your ability to complain?

Unless we think there are significant extenuating circumstances, we can't accept a complaint if it:

- is received more than [xx] months after the thing that is being complained about happened;
- is reopening a complaint that has already been concluded, and no new information is provided;
- is about a matter that is before the courts, has already been heard by a court, tribunal or statutory body, or where we have received a notice of a legal action; or
- violates our [respectful workplace or name appropriate policy]

How we deal with complaints

We will treat you with respect and handle the matters you bring to our attention fairly. We will maintain confidentiality and privacy throughout the complaints process. We strive to respond to complaints quickly and will keep you informed about the process and the anticipated timelines to handle your complaint. Our aim will be to address the matter to your satisfaction, but acknowledge that this will not always be possible. If we cannot take immediate action to resolve the problem, we will address the complaint internally through the following process.

Tier 1: Point of Service

Complaints are usually acknowledged within [xx] business days and assessed to ensure they can be dealt with under the policy. Where appropriate, staff will work with you to try and reach agreement on what action, if any, to take to reach an appropriate resolution. Where agreement is not reached, you can ask for the complaint to go to tier 2.

Tier 2: Review, dispute resolution and investigation

For serious or complex matters, or where Early Resolution was not successful, complaints are reviewed by senior staff who will work with you to try and reach an appropriate resolution. Where needed, we will conduct a fair, timely and impartial investigation to determine the facts and, after providing you with an opportunity to comment on this, we will make a final determination on your complaint.

External complaint, appeal or review processes

There is often an external review or appeal process that may be available for your complaint, and where possible, we will advise you of these processes. For example, you may wish to make a complaint to the BC Office of the Ombudsperson, Office of the Information and Privacy Commissioner for BC, or the BC Human Rights Tribunal.

What kinds of things can result from a complaint?

If we have made an error in providing our services we will take steps to fix the problem, which may include things like: acknowledgement and apology, error correction where possible, expediting an action, reconsidering a decision where appropriate, waiving a fee or penalty, or issuing a refund.

We also see complaints as an opportunity to improve our service delivery, so your complaint may help us know how our policies, procedures and communications need to change to better serve you and other community members in the future.