

Complaint Handling that ‘Works Here’:

The Drivers and Barriers of Effective Complaint Handling in the BC Local Government Context

By

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B.A., University of Waterloo, 2017

M.A., University of Victoria, 2018

A Thesis Submitted in Partial Fulfillment of the
Requirements for the Degree of

MASTER OF PUBLIC ADMINISTRATION

in the School of Public Administration

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University of Victoria

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Abstract

Complaint handling is an effective tool for public sector governance. Effective complaint handling improves relationships between organizations and citizens by fostering trust and accountability, helps address gaps in public service delivery, and supports innovation in public service design. Despite these benefits, complaint handling practices at the local government level in British Columbia (BC) is often ad hoc, poorly designed, or non-existent. This thesis asks: what are the drivers and barriers for effectively handling complaints at the local government level in BC? The thesis argues that complaint handling occurs within a context of limited resources, which informs the drivers and barriers for effectively handling complaints. The thesis explores the drivers and barriers of complaint handling through a reflexive thematic analysis of interviews with senior-level local government administrators. The analysis revealed that operating in a context of limited resources led to the emergence of creative practices for handling complaints, including preventing complaints before they arise and handling complaints informally. Additionally, complaint handling is characterized by a tension between its private sector roots and public sector values like equality and fairness. The thesis concludes by making recommendations to improve complaint handling at the BC local government level.

Keywords: complaint handling; local government; reflexive thematic analysis

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Acknowledgments

This thesis would not have been possible without the support and guidance of my supervisor, Dr. Tara Ney. Thank you for your constant inspiration and encouragement throughout the process of writing this thesis. I would also like to thank Allison Habkirk, Brenda Gibson, Linda Adams, and Elizabeth Brennan for including me in your project and sharing your wealth of experience.

I am incredibly grateful to have been a part of such a great cohort. Specifically, I would like to thank the Spotted Owls, Julia Bilinski, and Scott Wilson. Thank you for all the laughs along the way.

I would also like to thank my mom, Karen, and my sister, Kandi. You both mean the world to me. I could not have completed this without your love and support and our 2–3-hour long Facetime calls.

Of course, I would like to thank my cat, Topaz, for your calming purrs when I was stressed and for always reminding me that it is okay to take a nap.

Lastly, I would like to thank my fiancée, Lauren Yawney. Your support, willingness to listen to my (often incomprehensible) ideas and constant encouragement was the inspiration I needed to see this project through to the end. I am so grateful to have you in my life.

Dedication

This thesis is dedicated to those who passed away while I was completing this project: Reinhardt Lutzer, Dawna Prosser, and Pouncer Yawney-Prosser.

Introduction

Recently, there has been a growing academic and governmental interest in improving administrative justice and access to justice in response to increased expectations of public services (Amsler et al., 2020; Sossin, 2017). While most of this literature has focused on tribunals (Sossin, 2017) and Ombuds institutions (Kirkham & Gill, 2020), less attention has been given to internal complaint handling despite the benefits that have been identified with such practices. Effective complaint systems and complaint handling practices strengthen the long-standing relationships between public sector organizations and their service users (Creutzfeldt, 2016) and help foster trust and accountability (Brewer, 2007; Christensen & Laegreid, 2005; Christensen et al., 2020; van de Walle, 2018). Complaints are also recognized as an effective mechanism for continuously improving and addressing gaps in public service delivery (Simmons, 2016; Simmons & Brennan, 2013, 2017). Complaint systems also reduce the amount of resources required to address complaints (Dunleavy et al., 2010; Gill, 2015) and limit more challenging complainant conduct, which can negatively impact staff (Brennan et al., 2017; Mullen et al., 2006). Notably, the themes of redesigning service delivery to be more effective and accessible and fostering trust in institutions are more pressing within the context of the COVID-19 pandemic (Brouselle et al., 2020).

Despite the benefits of effectively handling complaints, the British Columbia (BC) Office of the Ombudsperson reported their second-highest number of complaints and enquiries ever received about public sector organizations in their 2020//2021 Annual Report (n = 7,714), with 12% of these being about BC local governments (2021a). To explain the prevalence of complaints about local government, Ombuds institutions in BC and Ontario emphasize that there are no federal or provincial regulations that require local governments to have complaint redress

systems (BC Office of the Ombudsperson, 2020; Ontario Ombudsman, 2018). Beyond this, Leakey (2018) found that only 6% of local governments in BC have complaint systems that comply with best practices¹. He concluded that local government complaint mechanisms are ad hoc, poorly designed, or non-existent (Leakey, 2018).

Research Question and Significance of Contribution

While there are significant benefits to effectively handling complaints, local governments in BC have not developed complaint handling practices aligned with emerging research and developments. Taking this as a point of departure, this study investigates the following research question: *what are the drivers and barriers for effectively handling complaints at the local government level in BC?* I argue that complaint handling at the local government level occurs within a context of limited resources, which informs the barriers and strategies for effectively handling complaints. While administrators identified having limited capacity to handle complaints due to resource constraints, the resource limitations led to the emergence of creative practices for handling complaints, including preventing complaints before they arise and informally handling complaints. Lastly, complaint handling at the local government level is characterized by the tensions between private sector values (e.g., efficiency, choice) and public sector values (e.g., equality, justice) and between individual interests and the public good. These findings illuminate new directions that can support local government administrators to improve their complaint handling practices.

¹ In Leakey's study, 'best practices' refer to those within the Dispute System Design (DSD) body of literature, most notably Gill et al. (2016). DSD will be referred to throughout this study. DSD is the "purposeful" creation of a system for managing and resolving disputes in the expectation that the system will be used more than once" (p. 446-447). This approach focuses on the *design* choices that are made when creating a complaint system. Leakey investigated whether BC local governments *designed* their complaint systems in accordance with best practices.

While there has been a proliferation of interest in complaint systems for public services, particularly in the European context, there has, until recently (Amsler et al., 2020), been a lack of theoretical and empirical engagement about public sector complaint systems within the North American context, and the Canadian context in particular. My research will respond to this lack of engagement by examining barriers and drivers to implementing effective complaint handling practices in the Canadian context. Beyond this, my study complements and informs several bodies of literature within the public administration discipline, most notably the challenges associated with New Public Management (NPM) (Gill et al., 2020), the complexity of public sector service users (Simmons, 2009), and the realities faced by local governments when delivering services (Kim & Warner, 2021).

Working Definitions

This study seeks to identify the drivers and barriers to implementing *effective internal complaint handling practices at the local government level*. Before proceeding, it is worthwhile providing working definitions for these terms.

Complaints

A complaint is “an expression of dissatisfaction made to or about a public organization about some aspect of its programs, services or people where a response is explicitly or implicitly expected” (NSW Ombudsman 2017, p. vi). This definition reflects a growing consensus within academic, government, and grey literature that complaints should be defined broadly so that all expressions of dissatisfaction are accepted (see BC Ombudsperson, 2020; Daskal & Kampf, 2015; Simmons & Brennan, 2013, 2017).

Internal

‘Internal’ complaint handling refers to the practices and mechanisms organizations employ to manage and respond to complaints. Complaints are managed by members of the organization, and redress for complaints is granted by the organization itself. In contrast, ‘external’ complaint handling is conducted by institutions separate from the organizations the complaints are about. Examples of external complaint handling mechanisms are Ombuds institutions (for public organizations only), tribunals, and courts.

Complaint Handling Practices

Complaint handling can range from informal to formal practices, including point-of-service complaint resolution (Gulland, 2011) to more sophisticated, multi-tier complaint systems that include elements of alternative dispute resolution (ADR) (Amsler et al., 2020).

Effective

While different approaches to complaint management have been advocated for in academic and grey literature (see, for example, the literature on DSD: Gill et al., 2016; Amsler et al., 2020), this study does not prescribe an ideal type as a necessity for effective complaint handling. Instead, it is important to recognize the diversity of forms that complaint handling practices can take and that institutional and political contexts shape the form and content of complaint handling. This recognition emerges from DSD literature, which argues that complaint systems and complaint handling practices are products of the cultures in which they are produced and that complaint systems need to ‘make sense’ to those who handle complaints (Amsler et al., 2015; Amsler et al., 2020; Amsler & Sherrod, 2017; Bendersky, 1998; Brett, 2011). Culture, in this sense, is defined broadly and includes multiple levels (national, regional, local, organizational, professional). The goals of complaint systems, including measures/indicators of effectiveness, are culturally dependent. In the BC context, indicators of effectiveness for

complaint systems include efficiency, increasing citizen trust, achieving meaningful complaint resolution, managing a high complaint volume, reducing the costs of complaint handling, and improving local government services (Leakey, 2018).

Local Government

Definitional and conceptual issues related to local government will be explored in more depth in Chapter 3. For this study, local government is “a government, other than the federal or provincial government, which:

- has jurisdiction over a defined territory,
- is governed by a body of locally elected public officials,
- and has the power under provincial legislation to impose property taxes either directly, indirectly, or conditionally” (Bish & Clemens, 2008, p. 5).

Outline of Thesis

This study is informed by the *interpretive* framework developed by Wagenaar (2011).² Interpretive inquiry approaches context as a wide-ranging analytic concept that contains macro-, meso-, and micro-levels of analysis (LeGreco & Tracy, 2009; Wagenaar, 2011). Understanding context along these analytic dimensions will help explore how effective complaint handling is constrained or facilitated by micro-, macro-, and meso-level factors. In this way, the following chapters aim to outline the macro- (broader public sector management values and trends), meso- (BC local government institutional context), and micro-level (local government administrator’s perceptions of effective complaint handling) factors that act as drivers and barriers of effective complaint handling practices.

² For a more in-depth discussion of the interpretive approach, see Chapter 3.

In Chapter 1, I develop a framework of the importance of complaint handling within public services for the purposes of service improvement and citizen participation. Then, I trace the historical development of complaint systems as a public sector management strategy from its roots in NPM to make explicit the values and assumptions that undergird complaint systems. I conclude this chapter by providing a literature review of the drivers and barriers to effective complaint handling that have been identified in the health services, public service innovation, and co-creation literature.

Chapter 2 explores the complaint handling and administrative justice landscape in Canada and BC and notes the absence of regulatory requirements for complaint handling in Canada. I also provide an overview of the institutional structure of local governments in BC and the various governance challenges they face.

In Chapter 3, I provide the findings of my Reflexive Thematic Analysis of semi-structured interviews of senior local government officers in BC. To do this, I develop an interpretive methodology and share the findings of my qualitative analysis, specifically the drivers and barriers of effective complaint handling at the local government level. For the data collection component of my study, I was fortunate to collaborate with a research team for a project funded by the Jean Monnet Erasmus+ Program Fund. The nature of this collaboration will be explored in more detail in Chapter 3.

In Chapter 4, I discuss the implications of my findings by situating it within the theoretical context described in Chapters 1 and 2. Specifically, I explore what my study illustrates about public sector complaint handling as a complex practice. Lastly, I draw on these insights to provide recommendations for improving complaint handling at the local government level in BC.

Chapter 1: Literature Review

This chapter will proceed in four main sections. First, I review the importance of service user/citizen voice in public services and the different mechanisms for expressing voice. Second, I describe the historical trajectory of complaint procedures to make explicit the underlying values and assumptions of complaint handling mechanisms. Third, I provide an overview of the literature on public sector complaint handling at the local government level. Lastly, I conclude with a typology of the drivers and barriers of effective complaint handling and public sector innovation to contextualize my later findings.

The Importance of Voice in the Public Sector

Exit and Voice in Public Services

Recently, there has been an increased focus on how citizens interact with the public services they consume (Farrell, 2010). Undergirding this interest is a growing recognition in public sector management that citizen engagement and input is necessary to adequately gauge expectations, improve responsiveness, and better operate within increasingly complex social and political contexts (Lindquist, 2013). While there is disagreement in the academic literature about the degree to which citizens can influence public service design and delivery, the literature points to the importance of citizen voice in improving public service delivery. Albert Hirschman's (1970) exit, voice, and loyalty model (EVL) is frequently used to investigate these dynamics of public service delivery. Hirschman was interested in how customers respond to service failures or declines in public and private sector organizations. He argues that there are two main responses to dissatisfaction: exit and voice. Exit refers to escaping from organizational decline by leaving an organization or ceasing to purchase its products (Hirschman, 1970; Shinohara, 2018). Voice, by contrast, is "interest articulation...to alert the management to shortcomings or

to make managerial action more responsive to the stakeholders' needs and demands" (Haarmann et al., 2010, p. 214). Voice is "multiform and complex" (Dowding & John, 2012, p. 9) and refers to both individual and collective acts.

The academic literature that draws on the EVL framework is largely concerned with assessing the "exit-voice trade-off." Hirschman (1970) argued that there is a negative trade-off between exit and voice, meaning that "fewer exit opportunities generate voice because individuals do not have any low-cost options to deal with their dissatisfaction" (John, 2017, p. 513). This trade-off is particularly relevant in the context of public services since opportunities for exit may be much more limited than in the private sector, where consumers can choose among competitive goods or services offered in the market if they are dissatisfied with their current goods or services. The practicality of exit in public services is more limited as there may be no or limited choice of alternative services, or exit may be too costly for public service users (PASC, 2004; Simmons et al., 2011).³ As such, the inaccessibility of exit as a response to public service failure points towards the importance of ensuring citizens can express their dissatisfaction through voice.

Citizen Expectations of Voice and Voice Mechanisms

Citizen expectations of voice vary widely and are often tied to service users' understanding of their relationship with public services. According to Simmons (2009), the complexity relating to why people express voice is tied to Hoggett's (2003) position that the public sector is "the site for the contestation of public purposes and...an essential means of

³ For a review of the literature about the exit-voice trade-off in the public sector, see James & John (2021). As an example, Devereux & Weisbrod (2006) study geographic mobility as a form of exit in response to dissatisfaction with local public services. The researchers found that while citizens considered moving from one municipality to another due to dissatisfaction with services, there are significant financial and social costs with doing so (see also Pierre and Roiseland, 2016).

containing social anxieties” (p. 2). In other words, citizens articulate their perspectives and interests through voice based on the ‘public purposes’ and ‘social anxieties’ that people value (Simmons, 2009). The complexity of voice is also related to the different identities that are ascribed to users of public services. A significant body of public administration literature has attempted to grasp the role and identity citizens have towards the services they use. For example, citizens have been conceptualized as “citizens,” “consumers,” “clients,” “citizen-consumers,” “partners,” “customers,” and other metaphors (Monrad, 2020; Nordensvard & Ketola, 2019). This discourse within public administration reflects the complexity of individual identity within an increasingly fragmented and complex world. To capture this complexity, Simmons (2009) proposes the concept of a ‘differentiated consumer,’ which seeks to illustrate how individuals hold multiple and, at times, conflicting identities that inform how they interact with public services. Differentiated consumers hold both individual (e.g., as a self-interested consumer) and collective (e.g., as a member of a political community) identities and expressions of voice can speak to either or both identities. Given this, Simmons (2009) found that people may use voice to seek individual redress for a service failing, attempt to expand the choices available to consumers, expressing a “depth of feeling on an issue,” or a sense of membership and solidarity (p. 59). Citizens can use voice to express a range of perspectives for a variety of purposes, and can express different identities through voice (i.e., citizens can express their identity as a public service *consumer* or as a member of the political collective).

Given the complex and multifaceted nature of voice, approaches to citizen voice that only see citizens as one-dimensional consumers are ineffective in meeting the demands of contemporary service users. As such, researchers have analyzed how different types of voice can

be best channelled, or what institutional frameworks are more appropriate for different expressions of voice. Simmons et al. (2011) describe three main channels for voice:

- Hierarchical channels (e.g., contacting elected officials, Ombuds institutions),
- Individualistic channels (e.g., complaints procedures, personal communications), and
- Group-based channels (e.g., user groups, user forums, consultative committees) (p. 8).

This framework aligns with Dowding and John's (2008) identification of "individual voice," where an individual complains to a service provider and expects redress, and "collective voice," such as voting, campaigning, and pressure groups (p. 292).

In their study, Simmons et al. (2011) found that public service leaders perceive different channels as being more effective at achieving different outcomes and as being more responsive to certain kinds of voice. Specifically, individualistic mechanisms are most appropriate for "discussing one-off problems, on-going problems, and getting recompense" (Simmons et al., 2011, p. 12). Hierarchical channels are most effective for campaigning against major changes and developments in addition to discussing ongoing problems. Lastly, group-based channels were found to be most appropriate for "gaining a better understanding of the service" and developing new ideas (Simmons et al., 2011, p. 12). As such, different mechanisms for expressing voice exist for different reasons, and all mechanisms play a role in making public services more responsive to service users. Indeed, Clark argues that internal complaint procedures can act as a complement to more external forms of complaint resolution (1999). While this thesis focuses on individualistic mechanisms of voice, it is important to remember that individualistic mechanisms operate in a broader ecosystem of citizen expressions of voice.

In short, providing opportunities for citizens to express their dissatisfaction with public services is necessary given the inability of citizens to effectively 'exit' from public services.

Citizens should be able to express voice through a range of mechanisms to reflect the complexity of identity and citizen perceptions of their relationship to public services.

Public Sector Complaint Systems: Historical and Theoretical Context

New Public Management and Charter Reforms

Having established the importance of voice in the public sector, we can now turn to discussing one voice mechanism: complaints procedures. Before the 1990s, the predominant mechanism for expressing dissatisfaction with administrative decisions and actions was through external procedures, which had a legal or administrative focus (Gill et al., 2020). Examples of these mechanisms are tribunals and Ombuds institutions. By the 1990s, the emphasis on complaint handling shifted to developing internal procedures under the broader New Public Management (NPM) reforms (Brewer, 2007). NPM is a public sector reform agenda that argues for “a more managerial and market-oriented framework for public service delivery” (Osborne, 2021, p. 5) and to recast the relationship between citizens and administrators. Since an expansive review of the NPM literature is beyond the scope of this study, the following are the key points regarding NPM.

- Participation was reconceptualized as ‘consumerism.’ Under this model, citizens are understood as self-interested consumers (Hirschman, 1970; Osborne, 2021).
- By understanding citizens as consumers, public services were seen as needing to be more responsive and inclusive by encouraging service providers to understand citizen preferences (Clark, 1999; Gill et al., 2020; Jones & Needham, 2008).
- To achieve the goals of improved responsiveness and customer service, public sector organizations turned to private sector management techniques (Brewer, 2007).

In short, the shift towards NPM recasts citizens as ‘consumers’ of public services, resulting in public services needing to be responsive to citizens’ needs and expectations and more closely reflect private sector values (e.g., efficiency, cost-effectiveness, etc.). Under this shift, the practices and structures of public sector organizations were informed by the goals of NPM, including public sector organizations’ strategic objectives, organizational structures, performance management systems, management, and corporate culture (Diefenbach, 2009).

Before turning to a discussion of complaint handling practices, it is important to review one of the central critiques of NPM, namely that by privileging private sector, consumerist values, other values that were traditionally upheld in the public sector, such as equality, justice, and fairness, were neglected. To this point, Aberdach and Christensen (2005) argue that reconceptualizing citizenship as a consumerist relationship between the citizen and the state focuses on individual preferences and rights and de-emphasizes common goods and collective action. Because of this, several issues emerge regarding political equality. Regarding levels of service, Aberdach and Christensen (2005) state that in the private sector, organizations can respond differently to different customers to meet their expectations. However, public services responding to citizens in this way “flies in the face of the notion that citizens are entitled to equal treatment...in a democratic society” (p. 236). Fountain (2001) describes this tension as a ‘paradox of public sector customer service’: enhancing “customer service is likely to exacerbate political equalities even as it improves some aspects of service production and delivery” (p. 56). Fountain argues that customer service can threaten the pursuit of political equality due to the private sector roots of customer service strategies. Lastly, Diefenbach (2009) argues that NPM challenges more communitarian conceptions of justice based on collective ties and the common good, specifically distributive justice and social justice.

One of the key private sector management techniques to emerge under NPM are formalized complaint handling practices, policies, and procedures. While complaint procedures were originally developed for private sector business in the United States, they quickly influenced public sector reforms in the United Kingdom (UK) during the 1990s (Allsop & Jones, 2008; Birkinshaw, 2010; van de Walle, 2018). The proliferation of complaints procedures can be traced to the introduction of Citizen Charter initiatives in the 1990s. Charter reforms were a response to many of the demands of NPM described previously (Drewry, 2005; Duggett, 1998; Falconer & Ross, 1999; James et al. 2005). Citizen Charter initiatives served to reinforce the reconceptualization of citizens as ‘consumers.’ Specifically, Charter Initiatives’ aim was “to empower the individual as consumer, informing choice through knowledge of various providers and products, rather than enhancing [their] rights as a citizen through new legal and political rights or social entitlements” (Taylor, 1999, p. 30). Because of this, ‘participation’ under Charter Initiatives involves the individual exercising rational choice in deciding which services to consume by gathering information on service options, making demands on service providers, and, importantly for this study, requesting an explanation when service providers did not meet expectations. From this view, Deakin and Walsh (1996) state that approaching service delivery in this way “reduces welfare to a commodity and delivery of services to shopping at a supermarket” (p. 34). As such, Citizen Charter Initiatives served to reinforce the developments of NPM by privileging consumerist values and understanding the citizen as a consumer over other public service user needs, including collective identification and additional legal and social rights (e.g., values of justice and equality described above). Having made explicit the connection between Citizen Charter initiatives and NPM, I now turn to provide a historical overview of complaint handling within Citizen Charter initiatives.

In 1991, the UK Government published a white paper entitled *The Citizen's Charter: Raising the Standard*. *The Citizen's Charter* articulates six principles that public service providers were expected to adhere to, one of which was *putting things right*, or “well publicized and easy-to-use complaints procedures with independent review” (Clark, 2000). The Charter Unit's Complaints Task Force furthered the development of public sector complaints procedures based on private sector consumerist values. Indeed, Blackmore (1997) notes that one third of the Task Force members were from the private sector and that the findings of the Task Force have “a distinctly individualistic orientation, as opposed to a collective one, both at the micro and macro levels” (p. 39). Additionally, in their critical appraisal of Charter reforms, Falconer and Ross (1999) argue that the Charter reforms recasted the citizen as a consumer and that “it is the citizen as consumer whose interests and values the Charter address” (p. 341). This complaint handling model, called the ‘managerial model’ by Allsop & Jones (2008), was seen to “increase user participation, increase ‘satisfaction’ with services and to provide a mechanism for feedback to managers on problem areas” (Gulland, 2010, p. 483; Gill et al., 2019).

As described by McGuire (2001), Charter reforms throughout what Common (1998) calls the ‘core’ NPM policy community: Australia, the United States, Canada, and New Zealand. Specifically in Canada, the trend towards service charters is illustrated by *Quality Services*, a series of guides on various topics related to public sector customer service published by the Treasury Board Secretariat of Canada (TBS) during the 1990s (TBS, 1995). One of these guides was about effective complaint management. The guide defines complaints, includes a self-assessment guide of complaint management systems, and provides guidance related to setting up a complaint management system aligned with best practice (TBS, 1996). As such, the Charter

reforms informed public service developments in Canada, albeit to a lesser degree than the developments in the UK (Aucoin, 1995; Glor, 2001).

Since the Charter reforms, “internal complaints procedures have become universal in the public sector” (Gill et al., 2020, p. 802; see also Gulland, 2010). Despite this, Gill et al. (2019) identify common criticisms of this model, including that the lack of prescription/regulation in the Charter reforms produced a system that is confusing, complex, and costly. In short, complaints procedures “were neither providing customer satisfaction nor were they used to provide better public services” (Gill et al., 2019, p. 5). This finding is supported in the Canadian context as well (Sossin, 2017).

According to Gill et al. (2020), the managerial model of complaint handling has recently evolved to include more holistic considerations. Specifically, the ‘managerial-systemic’ approach to complaint handling is centred around improving the design and effectiveness of complaint systems and characterized by significant reviews that have attempted to rationalize and simplify the complaint handling landscape. Central to this development is the evolution of Ombuds institutions beyond just a complaint resolution function to including a ‘lesson-learning’ function and to take act as a ‘one-stop-shop’ (Creutzfeldt, 2016; Gill et al., 2020). To illustrate how these dynamics have played out in the local government context, I will provide a brief account of the MCHP regime in Scotland.

Case Study: The Model Complaint Handling Procedure Regime in Scotland

Contemporary local government complaint handling in Scotland has its roots in the historical process of devolution. Scotland was granted a greater level of self-government through a process of devolution, with the Scottish Parliament being established in 1999 (Cairney, 2011). There are two important points to discuss relating to Scottish devolution. First, is the relationship

between Scottish local government and the devolved national government, or central-local relations. Central-local relations in post-devolution Scotland is characterized by interdependence and relying more on personal relationships and less on impersonal regulations (Cairney, 2011; Jeffery, 2006). Indeed, local authorities in Scotland advocated for devolution between 1979 and 1997 because the policies of the UK Conservative government throughout the 1980s and 1990s impacted local authorities the most (Cairney, 2011; Jeffery, 2006). Because of this, while the Scottish Executive is recognized as having considerable influence over local authorities, the relationship is often framed as a ‘partnership.’ As such, local governments implement, deliver, and advise on much of devolved public services and policies and enjoy good relationships with the Executive (Alexander, 1997; Cairney, 2011; Jeffery, 2006; McAteer & Bennett, 2005).

The second key development is the renewed focus on administrative justice and Ombuds institutions following devolution. Prior to devolution, there were several different Ombuds schemes in the UK due to the “historical ad hoc manner in which [Ombuds] schemes were introduced” (Kirkham, 2010, p. 326; see also Zbiral, 2007). Because of this, devolution provided an opportunity to address system-level issues in the design of Ombuds and complaint-handling schemes (Hirst & Gill, 2020). Under the *Scotland Act, 1998*, Scotland was required to establish processes to investigate complaints of maladministration made about Scottish government agencies (s. 91(1)). To accomplish this, Scotland passed the *Scottish Public Services Ombudsman (SPSO) Act, 2002* (Act). The Act established the SPSO to deal with complaints that had been addressed by Scotland’s pre-existing Scottish Ombuds schemes. By unifying the previous Ombuds schemes, Scotland used devolution as an opportunity to create a fully integrated, one-stop-shop Ombuds institution (Hirst & Gill, 2020).

From this context, it is now possible to explore the development of the current regulatory framework for complaint handling in Scotland. Beginning in 2007, Scotland underwent an overall review of complaints handling in relation to all services within the Scottish administration's remit, including local governments (Gulland, 2010). The first in this series was the Crerar Review into regulation and complaint handling (2007). The review found that there was "considerable variation in complaint procedures across the public sector and existing arrangements were overly complex" for service users (Mullen et al., 2017). To promote consistency, simplicity, and transparency, the review recommended the introduction of standardized complaint systems across the public sector. (Mullen et al., 2017). Next, the Fit for Purpose Complaint System Action Group (Action Group) was established to action the recommendations of the Crerar Review. The Action Group advocated for "a standardised complaints handling process for each public service sector" (Sinclair, 2008, p. 2) that is based on the principles of consumer focus and simplification. The standardised process was to be developed in partnership between the SPSO and service providers (Mullen et al., 2017).

Following these reviews, the *Public Services Reform (Scotland) Act 2010* gave the SPSO the authority to lead the development of these standardised processes. Specifically, the SPSO was given the authority to publish a statement of principles and MCHPs (see. S. 16A and 16B of the *Scottish Public Services Ombudsman Act 2002*). The SPSO was also given the authority to "monitor complaint handling practice, identify any trends, promote best practice and encourage co-operation and sharing of best practice among listed authorities" (Mullen et al., 2017, p. 6).

To implement its new duties under the Act, the SPSO established the Complaint Standards Authority (CSA), an internal unit that worked with public service sectors to develop MCHPs and timelines for the implementation of MCHPs. The local authorities MCHP was

published in 2012 following consultation with a working group of local authority complaints experts (2020). According to Mullen et al. (2017), the MCHP:

- Introduced a uniform two stage procedure for dealing with complaints, with timescales for each stage;
- Encouraged the use of early resolution methods wherever feasible;
- Allocated responsibility for complaint handling in organizations;
- Included requirements for recording complaints and publishing complaint data and for reporting on complaint performance;
- Provided a definition of ‘complaint’; and
- Encouraged learning from complaints (p. 7).

All local authorities in Scotland were required to implement the MCHP by 2013.

While there is sparse academic literature on the impact MCHPs have had across the public sector, Mullen et al. (2017)’s study found that there has been full compliance among local authorities to implement MCHPs and that the MCHPs were beneficial. The researchers also found that MCHPs led to cultural change within local authority organizations, including a view that complaints were a valuable source of information that could be used to drive service improvements. This may be linked to the collaborative process through which the MCHPs were developed. As such, the MCHPs have been effective in improving complaint handling practices among local authorities in Scotland. Central to the success of the program is engagement with local governments in developing the MCHPs and the transformations in the role of the SPSO. As a result of these reforms, the SPSO now has both an investigative/complaint handling function and a quasi-regulatory function (Kirkham & Gill, 2020).

The MCHP regime case study illustrates key points about the historical development of complaint procedures. First, internal complaints procedures emerged from a consumerist orientation and continue to reflect such values as customer service, responsiveness, and providing redress at the level closest to the consumer. Second, internal complaints procedures exist in the broader administrative justice landscape of their context and are often strengthened or hindered by the capacity of other complaint handling institutions (e.g., Ombuds institutions). Lastly, calls for effective complaint handling can be voluntary for public sector organizations or required by regulation. While there have been some examples where voluntary regimes have led to adopting complaint handling practices, regulatory requirements and political impetus can be key drivers in implementing effective complaint handling practices. Without broader systemic reforms, the administrative justice landscape is ad hoc and can be confusing for service users.

Purpose of Complaint Systems

While the previous section discusses what the purpose of complaint systems were historically (e.g., consumer responsiveness, etc.), this section will build on this historical framing and provide an overview of the literature about the uses of complaints procedures. According to Gill (2018), complaint systems are fundamentally for learning. However, the extent and impact of learning and what input is considered for learning is determined by the ‘underlying philosophies’ of complaint systems. Gill (2018) identifies two such philosophies: the ‘consumerist-managerial’ approach and the ‘relational-democratic’ approach. Gill argues that the consumerist-managerial paradigm is the predominant philosophy within contemporary public services and reflects the assumptions of NPM, specifically conceptualizing citizens as consumers and understanding complaint handling as a private sector management tool to gather consumer feedback. Under this paradigm, complaints concern “individual, atomised issues rather than

matters of public interest” and are “a performance management tool for managers” (Gill, 2018, n.p.). Complaint systems, under this paradigm, are systems of control established for the purpose of “policing and ensuring compliance with existing rules and values in public-service delivery” (Gill, 2018, n.p.). In other words, complaint systems ensure established rules are being followed, but do not provide any mechanisms to challenge those rules.

By contrast, the relational-democratic paradigm sees complaints as “opportunities to restore relationships, share experience, and co-create value between citizens and state institutions” (Gill 2018, n.p.). Under this paradigm, complaint systems are systems for disruptive innovation, designed for the purpose of disrupting the status quo and identifying new and innovative practices beyond the current consensus (Gill, 2018). To this point, Simmons and Brennan (2013, 2017) argue that being receptive to user complaints and viewing complaints as a tool for innovation can help public service organizations respond to the challenges of increased expectations and pressures to reduce costs. This orientation to complaints represents a shift from a 'delivery' to a 'relational' model of public service (Simmons and Brennan, 2013, p. 6). Under a 'relational' model, complaints are conceptualized as a form of knowledge that can drive innovation (Simmons & Brennan, 2013).

Undergirding these philosophies are administrative justice “orthodoxies” (Doyle & O’Brien, 2020). For the consumerist-managerial paradigm, the three orthodoxies are “the priority of ‘the user’, the desirability of ‘system’, and the inevitability of ‘closure’” (Doyle & O’Brien, 2020, p. 5). The ‘user’ has become the central referent point for designing administrative justice systems, typified through a focus on ‘user friendliness’ and ‘user satisfaction’. However, this emphasis on the individual ‘user’ is complicated by the reality that individuals are never divorced from social and shared need. Second, designing administrative justice as a ‘system’ has

been informed by goals of making the process more uniform and structured. However, Doyle and O'Brien (2020) caution that too much emphasis on 'system' can lead to uniformity and inflexibility, which administrative justice originally sought to overcome. Lastly, the goal of administrative justice has been to achieve 'closure' for individual complaints. However, such a goal of maintaining 'business as usual' takes away opportunities to iteratively improve practices.

In contrast to the consumerist-managerial paradigm, Doyle and O'Brien (2020) advocate for a relational-democratic 'imaginary' or 'vision' (O'Brien 2015a, 2015b) based around the values of 'community' (as opposed to individual user), 'network' (as opposed to system), and 'openness' (instead of closure). Under these values, the researchers emphasize the importance of social and collective ties of the individual in making complaints, the importance of flexibility and adapting "reflexive regulation" that is reflective of "a more nuanced and agile social environment" (p. 68), valuing innovation to emerge from uncertainty rather than requiring closure. It is important to note that Doyle and O'Brien view this model as an imaginary or as a model to work towards rather than as something existing currently. Indeed, while academic literature has pointed to the democratic potential of complaint systems (Chen et al. 2003; O'Brien 2015a), it is less developed in practice (Gill et al. 2020). Rather, the consumerist-managerial paradigm continues to prevail, with Gulland (2011) observing that public organization's complaint handling has emphasized resolving complaints, rather than using them to learn and innovate (see also Allsop & Jones, 2008).

This discussion of the purpose of complaints procedures illustrates the importance of the underlying philosophies of complaint handling in determining the extent of influence and how complaints influence public services. Under the consumerist-managerial paradigm, complaints are understood solely as an extension of service delivery and to ensure organizational practices

are in line with existing policies, practices, and procedures. By contrast, the relational-democratic paradigm views complaints as tools to disruptive and innovate existing practices and improve relationships. As will be illustrated in this study, these philosophies often coexist in practice and reflect the underlying values of public administrators. The next section turns to review the literature on complaint handling specifically at the local government level.

Academic Literature on Complaint Handling at the Local Government Level

The academic literature on complaint handling at the local government level is sparse, particularly in the Canadian context. The literature is sparse before the 1990s, as prior to this time the focus of effective complaint handling was on external institutions (e.g., Ombuds institutions) (Gill et al., 2020). The earliest study on local government complaints analyzes why citizens complain to their Members of Parliament (MP) rather than local councillors and how this impacts complaint handling practice (Cohen, 1973). The researcher found that citizens perceived local councillors as unable to effectively respond to complaints or that they are biased and ‘too close to the issue.’ The consequent complaint handling practice is ad hoc and disjointed. Both MPs and local councillors advocated for the establishment of a “local Ombudsman system” to deal with local grievances (Cohen, 1973, p. 182).

Literature on internal local government complaint procedures began to emerge in the 1990s, which reflects the historical trajectory outlined earlier. For example, Atkins (1992) describes the complaint system employed by a UK local authority and describes effective complaint handling as an aspect of the organization’s “quality culture” (p. 165). Additionally, complaints are viewed through a customer service lens and are viewed as useful tools to improve services. Lastly, Atkins points to the importance of implementing a complaint system that is appropriate for a particular local government in its specific context. Similarly, Dalrymple &

Donnelly (1997) connect complaints handling to quality assurance and improvement. The researchers developed a self-assessment instrument to help local governments assess the quality of their complaint systems against best practices.

Brennan and Douglas (2002) later found that while Scottish local governments typically encouraged complaints and had a complaints process, the complaints processes typically did not prioritize redress options and were unlikely to provide explanations of decisions. Additionally, there was significant variation in the quality of complaint systems across local governments. In another study, Brennan, Galloway and Thompson (2002) evaluated young people's perceptions of local government complaint procedures. They found that young people are generally unaware of local government complaint systems and found them to be inaccessible. The barriers young people experience in this area are the lack of information available about complaint processes, a perception of local government staff as unfriendly and bureaucratic, and a lack of confidence and social capital to navigate the complaint system.

The only study of local government complaint handling in the Canadian context is a recent study conducted by Leakey (2018). Leakey conducted a survey of local governments in BC to determine whether their complaint systems were aligned with best practices, conceptualized as aligning with the principles of DSD. Leakey found that only 6% of local governments had complaint systems aligned with best practices.

Lastly, Minelli and Ruffini (2018) focus their study on how well local government use administrators to improve services, particularly through the planning process and the barriers that prevent administrators from leveraging complaints more effectively. The researchers found that complaints were rarely used to inform planning processes, and in the cases that they were used, engagement with complaints was limited. The researchers argue public managers' attention

towards complaints was focused on “technical components” rather than on relationships between citizens and administrators (i.e., poor services received by local government employees) (p. 57). This may be a result of a lack of funds for training, scarce use of relational capital, or a recurring necessity to provide equal services to citizens. The researchers conclude by stating that while complaining is a powerful tool, there is no automatic mechanism to translate complaints into service improvement inputs.

To summarize, the literature around local government complaint handling is sparse and restricted largely to the UK context. Early studies looked at what effective complaint handling practice looks like, while later studies evaluated how well local government complaint systems align with best practices. This study will build on the orientation of Minelli and Ruffini’s (2018) research to identify the drivers and barriers of effective complaint handling practice in the BC context. Additionally, this study is unique as it will be only the second study on local government complaint handling in BC that the researcher could locate.

Drivers and Barriers

To explore the drivers and barriers public sector organizations face when handling complaints, this section will adapt the ‘typology of barriers’ framework developed by Cinar, Trott and Simms (2019, 2021) and Mergel (2018) to the complaint handling context. Additionally, the drivers and barriers identified will be supplemented by relevant literature from the public service innovation and organizational learning fields. Lastly, while literature on complaints in local government, or indeed in public sector organizations broadly, is limited, there has been a growing focus on complaint handling in health services. A summary of the drivers and barriers can be found in Table 1.

Drivers for Effective Complaint Handling

Intra-organizational Drivers

One of the most frequently cited drivers for effective complaint handling and related practices (i.e., public sector innovation; organizational learning) is leadership buy-in and support (Barette et al., 2012). For example, writing specifically about innovation, Mergel (2018) argues that while there may be willingness among front-line staff, the adoption of innovation processes is not “an emergent bottom-up, experimental process” (p. 733). Rather, the adoption of innovation processes is driven by policy initiatives and strategic alignment.

Similarly, Mergel (2018) and de Vries et al. (2015) point to the importance of organizational culture in enabling and driving effective complaint handling practice and learning. Specifically, organizational culture that values openness, transparency, and flexibility is associated with positive innovation outcomes. In their analysis of healthcare complaints, Desai (2010) argued that complaints can be an important source of information to improve services if the organization is receptive to and values feedback from distributed sources. Associated with this is the degree to which employees are empowered to innovate and resolve disputes as they arise (de Vries et al. 2015), which occurs most commonly in organizations with less rigid structures. Further to this point, Ombuds publications point to the importance of having an organizational learning culture to effectively handle complaints. For example, the BC Ombudsperson (2020) states that “complaint processes must be supported by a strong organizational culture that views complaints as a key way to receive feedback from the people using the organization’s services” (p. 5). As such, effectively handling complaints is supported by a broader organizational culture that encourages learning.

Literature from health services (Beaupert et al., 2014) and public services (Gill et al., 2019) emphasizes that organizational support for those who are complained about can drive

more effective employee engagement with complaint handling. One approach advocated to support this is ‘therapeutic jurisprudence,’ which draws attention to how policies, procedures, and practices in dispute resolution negatively impact complainants, complaint handling staff, and those being complained about and aims to minimize these negative impacts (Gill et al., 2019).

Lastly, having systems in place to acquire, interpret, and implement knowledge has been shown to drive effective complaint handling practice (Barette et al., 2012). This has also been found to mitigate the negative impacts complaints have on individuals within an organization (Scott et al., 2018).

Inter-organizational Drivers

There are also drivers for effective complaint handling practice between organizations. Specifically, the organizational learning (OL) literature points to how public sector organizations can draw on the experiences and practices of other organizations to change their practices (Barette et al., 2012; Rashman et al., 2009). To this point, organizations will often draw on the experiences of similar organizations that operate in the same context as it is perceived that there is less risk in introducing practices that have already been shown to be effective (Barette et al., 2012; Mergel, 2018; Rashman et al., 2009). Mergel (2018) also points to the availability of ‘best practices’ or standardized systems aligned with best practices as a significant driver.

Extra-organizational Drivers

There are drivers that exist for complaint handling at a societal/contextual level. First, broader technological/behavioural trends, such as the emergence of social media as a platform for engagement, and private sector practices can help improve current practices (Mergel, 2018; Simmons & Brennan, 2017). Similarly, cultural shifts towards responsiveness/customer service have been shown to significantly impact public services and the proliferation of mechanisms

through which to participate (Simmons et al., 2012). Changes in public sector management values, including viewing citizens as ‘co-producers’/’co-creators’ can also drive effective complaint handling practice. Lastly, some jurisdictions have opted to institute regulatory requirements for organizations to have complaints procedures (Allsop & Jones, 2008; Mullen et al., 2017). However, this has been particularly pronounced in contexts where service users are considerably vulnerable (e.g., health and social services) and less frequently occurs in less vulnerable contexts.

Barriers

Intra-organizational Barriers

Like drivers, most barriers to effective complaint handling emerge and are informed by factors within the organization. First, Mergel (2018), Cinar et al. (2019, 2021), Davis & Cleary (2005) and de Vos et al. (2018) identify organizational culture that does not value openness or diverse forms of input as a barrier. Organizational culture can be shaped by the type of organizations and its internal structure. Specifically, Mergel (2018) found that organizations that deal in more technical matters are less likely to accept external input into their services. Davies and Cleary (2005) also identify a lack of quality improvement infrastructure as a barrier to effective complaint handling and learning from complaints. Additionally, in organizations with more rigid organizational structure, individuals may have difficulty reconciling their role definition with the types of skills and responsibilities required for effective complaint handling. Torfing et al. (2019) further this point by arguing that public sector organizations have failed at developing new role definitions that align with current expectations and requirements of co-creation and innovation processes. Alkadry (2003) illustrates this point in the context of citizen engagement, where administrators may be hesitant to listen to citizens because the perceived

technical authority of public sector organizations compared to citizen knowledge. As with drivers, organizational culture is also significantly shaped by the degree to which management supports complaint handling. Lastly, Beaupart et al. (2014) and de Vos et al. (2018) identify a lack of resources, a lack of skills and expertise for effectively handling complaints, and a lack of systems, policies, and procedures as barriers.

Inter-organizational Barriers

As mentioned above, inter-organizational relationships and knowledge-sharing can be a driver for effective complaint handling practices. Barriers in this area relate to what negatively impacts the ability of organizations to share knowledge. Specifically, Dorado and Vaz (2003) and Cinar et al. (2019, 2021) identify a general lack of infrastructure for knowledge sharing across public sector organizations. Additionally, Cinar et al. (2019, 2021) identify the lack of involvement by essential organizations as a barrier. For complaint handling, this could include Ombuds institutions, who have increasingly taken on the role of sharing best practices and encouraging public sector organizations to learn from complaints (Gill et al., 2020).

Additionally, critical approaches to OL have cautioned against seeing OL as a perfect learning process. Specifically, these approaches point to the assumptions that undergird how OL takes place, the sources of knowledge that are deemed to be authoritative, and the extent to which OL impacts material organizational practices (Gherardi, 1999). For example, Gherardi argues that ‘learning in the face of problems,’ which assumes learning to be voluntaristic, functional, and tied to organizational change is undergirded by rationality and pragmatism. Gherardi contrasts this to ‘learning in the face of mystery,’ which, she argues, is a relational approach to OL that emphasizes distributed knowledge generation. In short, OL often occurs in

response to specific situations and the degree to which OL shapes practices outside of the immediate context may be limited.

Extra-organizational Barriers

There are also barriers on an extra-organizational scale to effective complaint handling. Specifically, researchers have pointed to how learning from complaints may challenge the legitimacy of public sector organizations in the eyes of the public (Cinar et al., 2019, 2021). Additionally, in environments where there is a lack of standardization or regulatory requirements for effectively managing complaints or implementing innovation processes, organizations may struggle to implement effective practices or may not view doing so as a priority (Mergel, 2018).

Interaction-Specific Barriers

Interaction-specific barriers are factors that hinder effective complaint handling that arise from the uniqueness of complaints as a form of information and input. There are three main barriers related to complaints. First, complaints can be difficult to interpret and generate value from since they are communicated in an unstandardized format and are often combined with affective elements (Beaupert et al., 2014; de Vos et al., 2018; Finney Lamb & Phelan, 2008). Second, administrators often harbour negative stereotypes about complainants, particularly in environments where complaints are made directly about employees (Beaupert et al., 2014; Scott et al., 2014). These negative stereotypes have been shown to affect the long-term relationship between complainants and the services they consume (Beaupert et al., 2014). Additionally, employees often do not view complainants as ‘normal’ service users (de Vos et al., 2018). Lastly, researchers have identified that many public sector organizations and employees do not view complaints as a useful form of knowledge, especially in situations where employees perceive complaints to be illegitimate/unfounded (Beaupert et al., 2014; Scott et al., 2018; de

Vos et al., 2018; van Dael et al., 2020). Further, Torfing et al. (2019) point to a general skepticism towards using experiential knowledge to inform policy.

Conclusion

In this chapter, I reviewed four bodies of literature. First, I described the complexity of public service users by introducing the concept of the ‘differentiated consumer’ and illustrated how the different expectations of differentiated consumers require different mechanisms for expressing voice. Second, I described the historical trajectory of complaint procedures, in particular its emergence within the overall NPM framework. The assumptions of NPM persist in the underlying assumptions of complaint systems, which result in tensions between private and public sector values. It is also important to note that a more recent relational-democratic approach has been proposed to view complaints as tools for innovation and disruption, and complaint handling practices as tools to restore public sector relationships. Next, I reviewed the sparse literature on complaint handling at the local government level and concluded by developing a typology of drivers and barriers for complaint handling and innovation in the public sector. In the next chapter, I explore the local government context in BC to understand the context in which local government administrators operate and manage complaints.

Table 1		
<i>Drivers and Barriers for Effectively Handling Complaints</i>		
Drivers		
<u>Locus of Drivers</u>	<u>Drivers</u>	<u>Sources</u>
Intra-organizational	Leadership willingness to handle complaints Organizational culture/structure that encourages transparency Employee empowerment Supporting those complained about (e.g., therapeutic jurisprudence) Systems in place to handle complaints	Barette et al., 2012; Beaupart et al., 2014; Gill et al., 2019; Mergel, 2018; de Vries et al., 2015; Scott et al., 2018; Desai, 2010; Rashman et al., 2009;
Inter-organizational	Organizational learning from other organizations' experiences/practices Availability of 'best practices'	Barette et al., 2012; Mergel, 2018
Extra-organizational	Broader technological/behavioural trends that could help improve current practices Broader cultural shifts towards customer service Legislative requirements for complaint handling	Mergel, 2018
Interaction-Specific	Viewing citizens as 'co-producers'/'co-creators'	Cinar et al., 2019, 2021; Osborne, 2006
Barriers		
<u>Locus of Barriers</u>	<u>Barriers</u>	<u>Sources</u>
Intra-organizational	Organizational culture (i.e., if organization's culture doesn't value openness, it may not effectively manage complaints, negative attitude towards complainants) Uncertainty about outcomes Lack of top-down management buy-in Lack of available resources Lack of skills to effectively handle complaints Lack of policies, procedures, and systems	Davies & Cleary, 2005; Mergel, 2018; Cinar et al., 2019, 2021; Beaupart et al., 2014; de Vos et al., 2018
Inter-organizational	Inadequate knowledge sharing across organizations Lack of involvement by essential organizations (e.g., Ombuds institutions)	Cinar et al., 2019, 2021; Dorado & Vaz, 2003;
Extra-organizational	Public perception of publishing complaints may challenge legitimacy of institutions Lack of standardization	Cinar et al., 2019, 2021; Mergel, 2018
Interaction-Specific	Complaints can be difficult to interpret and generate value from (e.g., not standardized; emotional) Complaints negatively impact those complained about View that complaints are illegitimate/not useful for learning 'Complainants' viewed as not 'normal' service users/negative stereotypes Complaints are imperfect data Conflicts around what knowledge is viewed as authoritative (e.g., in technical organizations, experiential knowledge is not valued) Inadequate role perceptions of administrators	Cinar et al., 2019, 2021; Beaupart et al., 2014; de Vos et al, 2018; Gill et al., 2019; Scott et al., 2018; Torfing et al., 2019; van Dael et al., 2020

Chapter 2: BC's Local Governance Framework: Establishing the Institutional Context

This chapter supplements the literature review by providing an overview of the local government system in BC and broader influences related to local governments and administrative justice that shape how local government administrators understand complaint handling. As a point of departure, it is necessary to specify what local government is. This thesis will use Bish & Clemens' (2008) definition of local government as "a government, other than the federal or provincial government, which:

- has jurisdiction over a defined territory,
- is governed by a body of locally elected public officials, and
- has the power under provincial legislation to impose property taxes either directly, indirectly, or conditionally" (p. 5; formatting in original).

There are nine types of local government in BC that fit this definition. This thesis will focus specifically on two types of local government: municipalities and regional districts.

Municipalities "provide a wide range of services and regulate a variety of activities" (Bish & Clemens, 2008, p. 5). There are 162 municipalities in BC, and 89% of BC's population lives in a municipality. Municipalities can be incorporated as towns, villages, districts, or cities, depending on their population size. Municipalities are governed by municipal councils, which are democratically elected to set policies, adopt bylaws, and establish direction for their communities. Councils consist of mayors and councillors and are often referred to as the political and public-facing arm of municipalities (Bish & Clemens, 2008; Government of BC, 2021a). Additionally, municipalities have administrative staff who advise the council and implement policies (Fenn & Siegel, 2017; Siegel, 2010).

Regional districts are general-purpose local governments “for the unincorporated areas of the province” (Bish & Clemens, 2008, p. 5). They provide a framework for inter-municipal cooperation where “any combination of municipalities and unincorporated areas may regulate activities, undertake service provision together and recover the costs from beneficiaries” (p. 5). Regional districts are governed by a board of directors composed of elected members from each electoral area and the elected council of each municipality within the regional district. The board of directors is supported by administrative staff as with municipal councils.

Governance Landscape of Local Governments in BC

There are three key elements to local governance in BC: education, advice, and training; legislation; and statutory offices. First, BC has a tradition of “close collaboration among ‘partner’ organizations that support the local government system...to provide advice, education and training” for local governments (UBCM, 2017, p. 10). The Union of BC Municipalities (UBCM), the Local Government Management Association (LGMA), and CivicInfo BC are three central partner organizations. The UBCM is an association that was established by the *Union of British Columbia Municipalities Act* and whose membership is comprised of BC municipalities. The UBCM develops policies in consultation with members at an annual convention and advocates on behalf of BC municipalities to various levels of government (King Plant, 2009; UBCM, 2012). The LGMA aims to support local governments by providing training and resources, encouraging the development of professional networks, and communicating best practices among members (LGMA, 2019). The LGMA has published resources on a range of topics, such as Responsible Conduct, conflict of interest, and electronic meetings. Lastly, CivicInfo BC, which is described as BC’s “local government information hub,” provides information and research tools to support local governments and practitioners (2021). CivicInfo

BC was established in 2000 in response to a UBCM needs assessment for a comprehensive and online local government information resource.

Second, local governments are often referred to as “creatures of the province,” meaning that they are positioned under provincial jurisdiction in the Canadian constitution (Tindal et al., 2016). As such, local governments are regulated under the *Community Charter* (CC) and the *Local Government Act* (LGA). The LGA sets out the core authority of local governments and includes the dominant legislation for local government land use planning, while the CC establishes the core areas of local government authorities, specifically broad powers (service and regulatory powers), property taxes, financial management, and bylaw enforcement powers (Buholzer, 2013). It is important to note that the City of Vancouver has its own enacting legislation, the *Vancouver Charter*. There are separate regulations and provisions for complaint handling and dispute resolution identified in legislation for local government bylaw enforcement, intergovernmental disputes, and Regional District service arrangements. Specifically, under the *Local Government Bylaw Notice Enforcement Act* (LGBNEA), local governments can voluntarily enroll in a bylaw notice dispute adjudication system to resolve minor bylaw disputes with citizens. Second, the CC and LGA establish a framework for resolving disputes between municipalities and other local governments, municipalities and the provincial government, and municipalities and crown corporations.⁴ Lastly, the LGA proposes a framework for disputes that may arise between Regional Districts and their service providers, specifically within the context of service reviews.⁵ It is beyond the scope of this study to provide a complete overview of these

⁴ Part 9, Division 3 of the CC sets out provisions related to interjurisdictional dispute resolution. Specifically, if a dispute arises between jurisdictions that cannot be resolved, the parties may apply to a dispute resolution officer for help in resolving the dispute. Matters that are heard through this process can be resolved by voluntary or mandatory arbitration, depending on the issues that make up the dispute. The *Dispute Resolution Regulation*, enabled by the CC, sets out more details around the interjurisdictional dispute resolution process: https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/42_2006.

⁵ Sections 357 and 361 of the LGA set out the service review and service withdrawal process.

frameworks, as they do not directly apply to how citizens can express their complaints to local governments. Rather, these dispute resolution processes exist to resolve disputes efficiently and effectively between governmental bodies and do not make specific provisions for citizen participation in the dispute resolution processes.⁶ From this review, it is important to note that there is no regulatory requirement for local governments in BC to have complaint handling practices aligned with best practices for resolving administrative or procedural issues articulated by citizens.

The final element of local government governance is statutory offices that perform various oversight functions. While there are several statutory offices in BC, the key office regarding local government complaint handling is the BC Office of the Ombudsperson (“the Ombudsperson”). The Ombudsperson is “an independent office of the Legislature with oversight jurisdiction over more than 1,000 provincial and local public bodies in British Columbia” (Office of the Ombudsperson, 2021a, p. 5). The Ombudsperson’s founding legislation, the *Ombudsman Act*, was established in 1979 and gave the Ombudsperson the ability to receive and investigate complaints from the public about public sector organizations, including local governments, to protect citizens from maladministration. The *Ombudsman Act* was later replaced by the *Ombudsperson Act, 1996*. The mandate of the Ombudsperson is to ensure and promote administrative fairness in public service delivery and design by responding to enquiries and complaints from the public, educating citizens and organizations, conducting impartial investigations, making recommendations to improve policies, procedures, and practices, and reporting out to the public (2021b). In 2019, the Ombudsperson was also given the responsibility

⁶ For a review of the Bylaw Notice Dispute Adjudication System and intergovernmental dispute system, see Leakey (2018). Additionally, the Government of BC has published resources describing these provisions. For more information, see Government of BC (2021b).

to investigate complaints made under the new *Public Interest Disclosure Act* (PIDA). Under PIDA, the Ombudsperson can investigate concerns made by current and former provincial government employees about wrongdoing in their workplace and can protect whistle-blowers from reprisal.

In addition to its conventional role as a complaint handling body, the Ombudsperson has also recently introduced a focus on education and continuous improvement by establishing the Public Authority Consultation and Training (PACT) team. The PACT team was initially created as a pilot project but was made a permanent program of the office in 2020. PACT “works proactively with BC public organizations, offering education, *voluntary* consultation and sharing of complaint data to enhance fairness and continuous improvement across the public sector” (2021c). To accomplish this, PACT offers online courses, webinars, organizational consultations, and training. However, it is important to note that the Ombudsperson’s role in this capacity is limited since the Ombudsperson cannot require that local governments implement complaint systems and can only assist local governments in an educative capacity.

The emergence of an educative/consultative function in the Ombudsperson office aligns with Gill et al.’s (2020) discussion of the shifting “domain perception” of Ombuds institutions. ‘Lesson-learning,’ or “learning from mistakes,” which is a common practice of private sector organizational learning, has become a common Ombuds and public sector practice (p. 807). Traditionally, there was a central tension within Ombuds institutions about whether they should focus on providing individual redress (‘fire-fighting’) or playing a more systemic function (‘fire-watching’). According to these researchers, ‘lesson-learning’ helps bridge the gap between “retrospective accountability and prospective regulation” and relieves the tension between its ‘fire-watching’ and ‘fire-fighting’ functions (Gill et al. 2020).

As such, the local government framework in BC regarding complaint handling is non-regulatory and relies on local governments voluntarily adopting complaint handling practices aligned with best practices. This supports Leakey's (2018) findings that only a small minority of local governments have complaint handling practices aligned with best practices, and the systems in place are poorly designed or ad hoc. However, the BC system is well-equipped to support collaboration, education, consultation, and knowledge sharing due to local government organizations like UBCM and LGMA and statutory offices like the Ombudsperson. Therefore, in contrast to the Scottish example described in the previous chapter where local government complaint systems are a regulatory requirement under the MCHP regime, these dynamics illustrate how promoting complaint handling at the local government level in BC could play out voluntarily and through education and sharing best practices.

Local Government: Theoretical Considerations

In addition to the institutional context of local government in BC, local government administrators' understanding of complaint handling is also informed by broader theoretical concerns related to the purposes of and challenges faced by local governments. The following section describes some of these theoretical issues.

According to Sancton (2015), local governments are established for two main reasons: efficiency and participation. Regarding efficiency, Sancton (2015) argues that local governments are better able to deliver certain services in a more cost-effective manner than higher levels of government and ensure that the services provided by a local government match as closely as possible to what people want (see also McAllister, 2004). The primary function of local government, then, is to efficiently deliver services in a manner that ensures the bundle of services that are offered aligns with the interests of local citizens.

The second purpose of local governments, participation, is more contested (Flynn & Spicer, 2017). Sancton (2015) argues that the literature on local government tends to overstate the importance of citizen participation and the ability of citizens to shape local government policies meaningfully. Indeed, while there have been increasing calls for more opportunities for citizen participation, local government officials have been less enthusiastic about providing such opportunities (Pierre & Roiseland, 2016). Additionally, when those opportunities are provided, through mechanisms ranging from electoral systems to focus groups, citizen turnout has been mixed (Tindal et al., 2016; Turnbull & Aucoin, 2006). To this point, Graham (2015) posits that there is a paradox of public participation: while demands for citizen engagement in the period between municipal elections have increased, voter turnout in municipal elections is low.

Quinlivan (2017) draws on Dahl's (1994) framework of democratic legitimacy to illustrate the two purposes of local government. There are two fundamental elements of democratic legitimacy: 'input legitimacy,' or the degree of citizen participation, and 'output legitimacy,' or the ability of local government to deliver services efficiently and effectively. Quinlivan argues that there is often a trade-off between input and output legitimacy. For example, a focus on output can lead to a democratic deficit, while a focus on input can reduce the effectiveness of policymaking. In short, there is a tension between efficiency and participation, the two key functions of local government. As shown in the thematic analysis in the following chapter, local government administrators encounter this tension in complaint handling and must navigate these dynamics in practice.

It is important to contextualize this tension within the broader context of socioeconomic changes, particularly in the aftermath of the 2008 Great Recession. Specifically, many local government scholars argue that the recession impacted the institutional context in which local

governments operate due to the emergence of austerity measures at the national level. Austerity measures have led to an emergence of the ethos of ‘doing more with less,’ which, as Lowndes and Gardner (2016) note, is “essentially a restatement of the [NPM] mantra introduced” in the 1980s (p. 365). At the local level, these dynamics have played out in the emergence of privatization and public-private partnership schemes and staff and budget cuts (Kim & Warner, 2021). In contrast to this view of local government as being primarily concerned with ‘doing more with less,’ scholars have promoted the concept of ‘pragmatic municipalism’ to explain local government resilience in the context of austerity. ‘Pragmatic municipalism’ refers to an approach to local government service delivery “that balances community needs and defends traditional local government services within the limits of fiscal stress” (Kim & Warner, 2016, p. 789). In addition to recognizing the context of fiscal stress and how this informs service delivery, pragmatic municipalism emphasizes the ‘publicness’ of local government. As noted by Kim and Warner (2021), the publicness of local governments constrains their responses to fiscal stress and creates unique challenges, including how to maintain legislatively mandated services with constrained budgets, and how to balance citizen engagement and support for services with constrained resources. Pragmatic municipalism scholars argue that it is a more realistic view of local government: “only a few governments focus just on cuts...while the majority employ a balanced approach” (Kim & Warner, 2021, p. 241).

To meet community needs with limited resources, scholars have found that local governments have modified existing and developed new practices (Denis et al., 2007; Lowndes & McCaughie, 2013). However, introducing and improving practices has occurred incrementally. Because of this, scholars propose that local governments often focus more on a ‘politics of the present,’ wherein administrators work to respond to the immediate challenges and

demands made by citizens pragmatically, rather than redesigning government to reflect broader ideological shifts (Clark, 2012; Lowndes & McCaughie, 2013). The strategies and practices employed to respond to the politics of the present are developed so that they “work here” (Coaffee & Headlam, 2008, p. 1587). According to Barnett et al. (2020), “working here is “an empirical...judgment resting on how any solution enables communities to ‘cope with the messiness of everyday life’” (pp. 517-518, see also Wood & Smith, 2008). In short, rather than reduces services, local governments have responded to citizen demands in the context of limited resources by adapting and improving their practices creatively.

While much of the literature of pragmatic municipalism is based in the US and UK context, the dynamics that inform the rise of pragmatic municipalism, specifically austerity politics, exist in the Canadian context (see, for example, Hamel & Keil, 2020; Lowndes & Gardner, 2016). In short, pragmatic municipalism accounts for local government’s functions as a service provider and as a democratic institution. In practice, local governments aim to strike a balance between providing services efficiently and equitably, and ensuring citizens have opportunities to participate in the design and provision of the services that impact them. As described later, this tension is central to how local government administrators understand and approach complaint handling.

Administrative Justice in Canada

While not being central to the present study, administrative justice is integral to discussions of complaint handling. Adler (2003) defines administrative justice broadly as “the principles that can be used to evaluate the justice inherent in *administrative decision-making*” (p. 323-324; emphasis my own), including procedural fairness (e.g., fair treatment) and substantive justice (e.g., outcomes). Under this framing, effective complaint handling can be seen as a

mechanism to promote administrative justice by ensuring fair outcomes and correcting administrative processes and procedures when citizens do not feel that they have been treated fairly. Put succinctly, the goal of effective complaint handling is “to deliver justice” (Amsler et al. 2020, p. 14). As described in the Scottish example in the previous chapter, concerns about administrative justice, system design, and user experience were central to the Scottish government’s public sector redress reforms. In contrast, administrative justice in Canada is considerably less developed. According to Sossin (2017), the administrative justice landscape in Canada at all levels of government “is generally fragmented, poorly coordinated, and under-resourced in relation to the needs of its users and has multiple barriers of entry” (p. 88). Further, Sossin found that Canada has lagged behind other jurisdictions in developing standardized frameworks for administrative justice institutions. Sossin points to examples in New Zealand, the UK, and Australia, where governments have developed evaluative standards and design principles for tribunals. Ellis (2013) and Taillon (2017) also point to the fragmented and poorly constructed nature of Canada’s administrative justice landscape. Given the limited state of administrative justice in Canada, it may be unsurprising that there are no regulatory requirements for local governments to implement complaint systems. Additionally, in contrast to the Scottish MCHP regime described in the previous chapter, complaint handling practices in the Canadian context are likely to be ad hoc and to emerge in response to particular needs, rather than being intentionally designed.⁷

Conclusion

In short, the local government framework in BC is characterized by relying on voluntarism rather than regulation and a tradition of collaboration with partner organizations.

⁷ This observation, in part, justifies this study’s focus on complaint handling *practices* rather than *formal complaint systems*. This will be discussed more in the following chapter.

These partner organizations, specifically LGMA and UBCM, advise local governments, share best practices, and provide educational and training resources on various topics. Recent developments with the Ombudsperson towards a more consultative and educative role continue in this tradition. It is also important to note that local government administrators face tensions within the role of local governments as having both a service delivery and participatory function. As explored previously, these two functions can conflict, with an emphasis on either function negatively impacting the other. Lastly, the administrative justice landscape in Canada is underdeveloped and lags behind that in other Commonwealth countries. These dynamics will be apparent in how local government administrators negotiate the meaning of complaint handling, which will be the subject of the next chapter.

Chapter 3: Understanding the Drivers and Barriers of Effective Complaint Handling at the BC Local Government Level: A Reflexive Thematic Analysis

By this point, I have described the broader context in which local government administrators in BC operate. In this chapter, I employ a Reflexive Thematic Analysis (RTA) to analyze how local government administrators make sense of complaint handling. Through this analysis, I answer this study's central research question: *what are the drivers and barriers for effectively handling complaints at the local government level in BC?* In what follows, I develop an interpretive methodology, describe my methods, and present my findings, specifically the drivers and barriers of effective complaint handling at the local government level in BC.

Methodology

I use an interpretive approach (Schwartz-Shea & Yanow, 2012; Wagenaar, 2011) to explore how actors make sense of complaining and how broader contextual factors shape perceptions and attitudes towards complaining. Schwartz-Shea and Yanow (2012) describe interpretive inquiry as being “focused on meaning-making in context” (p. 53). Interpretive inquiry approaches context as a wide-ranging analytic concept that contain macro-, meso-, and micro-levels of analysis (LeGreco & Tracy, 2009; Wagenaar, 2011). Such an approach points researchers towards analyzing how individuals (de)construct their political and social environment, including the institutions with which they interact. Simultaneously, these social and political environments frame actors' possibilities for ideas, discourse, and action. In short, understanding context along these analytic dimensions helps researchers explore how practices and understandings are shaped by micro-, macro-, and meso-level factors. Exploring how administrators ‘make meaning’ about complaining along these analytic dimensions will provide an in-depth understanding to respond to this study's research question.

As this study will focus on complaint handling *practices* in addition to administrators' understandings of complaint handling, it is important to define what I mean by 'practices.' Drawing on practice-driven studies within interpretive inquiry (Bartels, 2013; Cook & Wagenaar, 2012; Wagenaar, 2004), Bartels (2018) defines practices as "the ongoing routinized and improvised practical activities of actors engaged in concrete tasks and situated in a wider social and historical context" (p. 73). This definition is useful as it connects the everyday practices of public administrators to the broader context in which they are enacted.

A final ramification of the centrality of context within interpretive inquiry is that research is understood as an iterative process wherein "researchers' initial conjectures are assessed and reassessed in the field" (Schwartz-Shea & Yanow, 2012, p. 53). The research design described below reflects the interconnectedness of the various stages of the research process and how research findings shape the following stages and, in some cases, shape previous stages and elements of the study. These dynamics are explored in greater detail in the following section.

Research Design, Methods, and Procedure

Research Design

Next, I will briefly describe the development of this research project as it illustrates Schwartz-Shea and Yanow's (2012) observation of how researchers' initial conjectures are reassessed throughout the research process. To answer my research question, I sought to interview Chief Administrative Officers (CAOs) and Corporate Officers (COs) working in BC local governments. I originally intended to recruit participants through purposeful sampling based on geographic region, constituent population size and demographics, and the number of complaints received by the BC Ombudsperson about the organization annually (Creswell & Poth, 2018). I also intended to collect and analyze the interview data deductively. Specifically, I

would develop the interview questions based on general categories and concepts that emerged from this study's literature review. For example, the original purpose of Table 1 was to see how the drivers and barriers for effectively handling complaints identified by the participants aligned with the drivers and barriers identified in other related bodies of literature. Beyond informing the research questions, I also intended to use the findings outlined in Table 1 to develop a codebook to code the dataset. In short, there was previously a more linear connection between the literature review and the data collection and analysis processes.

However, during the ethics approval process, my supervisor informed me about a similar research project she was involved in and was funded by the European Union (EU) Jean Monnet Erasmus+ Program Fund. This project was conducted by a team of researchers consisting of consultants and practitioners with extensive experience working in and with local governments in BC.⁸ The final output of this project was the *Guide to Complaint Handling for BC Local Governments*, which is a guide to support local governments in BC to implement complaint systems based on best practices.⁹ Like my study, the CGRT planned on interviewing CAOs about their experiences with and understanding of complaints and complaint handling. Given the significant overlap between the CGRT's project and my project, my supervisor suggested that we work together to develop the interview questions and data collection methods and draw on the same interview data for both research projects.¹⁰

As a result of this collaboration, I was required to adjust my overall approach to my data collection and analysis methods, described in the next section. However, it is also important to

⁸ The research team for this project will be referred to as the Complaints Guide Research Team (CGRT).

⁹ When this thesis was published, the *Guide to Complaint Handling for BC Local Governments* was not yet published.

¹⁰ This research project and the CGRT's project were approved separately by the University of Victoria Human Research Ethics Board.

note that by working with the CGRT, I was able to respond to a significant barrier with my original research design: the challenges associated with “accessing” participants. Schwartz-Shea and Yanow (2012) point out that recruiting participants for research is often a complex process that can be limited by a researcher’s lack of connections with the participants and time limitations. Due to the CGRT’s professional experiences and connections with the sample population, many participants were willing to take part in the interview process.

With this context around the development of the present study, I will now explore the key methods and data collection tools used. Fourteen CAOs and COs working in BC local governments were interviewed for this project. To protect the anonymity of participants in the study, the local governments that the participants are representative of will not be specified. The study includes local governments with populations under 5,000 people to over 100,000. However, the study is limited in its geographical representation. Specifically, while Vancouver Island/Coast and Mainland/Southwest are overrepresented in the study, other regions, specifically those in northern BC, are underrepresented. As such, the findings of this study are not generalizable to every local government in BC. However, the findings still reflect recurring qualitative trends in how local government administrators understand complaint handling.

In contrast to my previous research design, the sample of local government administrators who participated in the study were recruited and selected by the CGRT based on team members’ professional experiences with the selected local governments and their employees. The CGRT identified potential participants through CivicInfo BC and local government websites. In particular, the team identified CAOs and COs from local governments with populations less than 15,000. Additionally, given that the members of the CGRT had decades of professional experience working with local governments in BC, the CGRT identified

participants based on their knowledge of local governments that may be valuable candidates to include in the study. After receiving ethics approval, the CGRT emailed a recruitment letter informing potential participants of their study and what they could expect if they decided to take part in the study. From this process, the CGRT was able to identify 14 CAOs or COs from various local governments that would be valuable for the study. I developed the recruitment tools (e.g., emails and letters) collaboratively with the CGRT.

The CGRT conducted the semi-structured interviews. Three to four members of the CGRT attended each interview and took turns asking questions to the participant. The interviews lasted between 30 and 90 minutes. Issues around confidentiality and anonymity were discussed with each participant at the start of the interview. The interviews were audio-recorded using Zoom, and I transcribed them manually.

As mentioned previously, due to how my study deviated from its original research design, I was required to adapt my approach to ensure the data collected was useful for both the CGRT's project and my project. Because of this, the CGRT and I worked collaboratively to develop the interview questions, ensuring that the data would be meaningful for both projects. The questions covered professional knowledge and understandings of complaints and the drivers and barriers of effective complaint handling.¹¹ However, I could not use the specific categories and concepts I identified through my literature review since the responses to these questions may not have been useful for the CGRT's research project. I adapted my approach to employ an inductive approach, which will be described in more detail in the following section.

Method

¹¹ For a script of the semi-structured interview questions, please see Appendix A.

Next, I will describe the data collection and analysis method I used for this study. The interview transcript data were analyzed thematically, drawing extensively on the RTA approach developed by Braun & Clarke (2006). RTA is “a method for identifying, analysing, and reporting patterns (themes) within data” (Braun & Clarke 2006, p. 79). There are two key concepts within RTA: codes and themes. A code is a word or phrase that “symbolically assigns a summative, salient, essence-capturing, and/or evocative attribute for a portion of language-based...data” (Saldana, 2016, p. 4). Codes are the researcher’s “interpretations of patterns of meaning across the dataset” (Byrne, 2021, p. 4). A theme refers to a specific pattern “that captures some crucial information about the data in relation to the research questions and features patterned meanings across the data set” (Xu & Zammit 2020, p. 2). Codes inform the development of themes: after identifying and developing codes in the dataset, the researcher produces themes by “organizing codes around a relative core commonality, or ‘central organizing concept’, that the researcher interprets from the data,” or, in other words, a theme (Byrne, 2021, p. 4). Proponents of RTA have pointed to its flexibility, meaning it can be mapped onto a range of theoretical and conceptual underpinnings (Braun & Clarke 2006; Braun et al. 2016; Fereday & Muir-Cochrane 2006; Xu & Zammit 2020).

As mentioned briefly in the previous section, I analyzed the data inductively, meaning that I generated codes and themes following close engagement with the dataset (Braun et al., 2016). Simultaneously, it is important to recognize that themes are generated by the researcher “through data engagement mediated by all that they bring to this process,” which includes prior knowledge in the field (Braun & Clarke, 2021). Reflexivity within RTA helps connect my data analysis to the literature discussed in the previous chapters: my reading of the dataset, including what was deemed relevant and meaningful, was shaped by concepts and categories that emerged

during my engagement with the literature. As such, recognizing the researcher's position with RTA connects data analysis to the academic literature while "allowing for themes to emerge from the data" (Fereday & Muir-Cochrane 2006; Xu & Zammit 2020). More crucially for this study, while my previous research design employed a deductive approach that had a more linear connection to the literature review, the inductive approach I employed is still informed by and connected to the categories and concepts I explored in the previous chapters.

This study followed the six-step approach outlined by Braun and Clarke (2006, p. 87):

1. Familiarizing yourself with the data
2. Generating initial codes
3. Searching for themes
4. Reviewing themes
5. Defining and naming themes
6. Producing the report

While this approach is presented as a linear process, the analysis was iterative, involving rereading previous stages of analysis to ensure themes were grounded in the original dataset (Fereday & Muir-Cochrane 2006). These steps will be described in the next subsection.

It is also important to note that I initially engaged in a process of systematic data coding, including identifying features of the data relevant to this thesis, based on an original research question of "what are the drivers and barriers for implementing just *complaint systems* at the local government level in BC?" Through the initial coding and theme development processes, it became clear that the participants understood effective complaint handling as less of a system and more of a collection of informal and formal practices that can be more or less systematized. As such, the research question was refined to "what are the drivers and barriers for effectively

handling complaints at the local government level in BC?” Next, I will describe the RTA procedure in detail.

Procedure

Next, I will provide an overview of how I conducted my RTA analysis. First, after receiving the audio recordings of the interviews from the research team, I manually transcribed the interviews while being sure to anonymize the dataset where necessary.¹³ After transcribing 4-5 interviews, I started to take notes about common concepts that occurred across the interviews for future reference (Step 1). After transcribing all interviews in full, I reread all the transcripts to generate initial codes (Step 2). To move from generating initial codes to searching for themes, I connected codes that shared a common element or concept and reviewed the text in the transcript to ensure codes were considered within their appropriate context. These constellations of codes are the themes that have emerged from the dataset (Step 3). I then reviewed the themes for accuracy and consistency, noting where contradictions within the dataset occurred (Step 4). Lastly, I named and defined the themes as close to the dataset as possible to not impose academic meanings and concepts onto the dataset (Step 5). It is also important to note that while these themes are described as self-contained concepts, they are fluid, and there is considerable overlap across themes.

Findings

Participants were asked a range of questions about how they understood the drivers and barriers for complaint handling and the usefulness of complaints as a method for improving services. While some participants indicated that their local governments do not receive many

¹³ For example, if the interviewers or participants mentioned the name of a municipality, the text entered into the transcript was [Municipality]. Similarly, any individuals’ names that were mentioned during the interviews were anonymized and represented by their occupation (e.g., [Participant], [Mayor], or [Council Member 1]).

complaints or were unsure what constitutes a ‘complaint,’ the resultant dataset is valuable for understanding how local government administrators make sense of complaint handling. The responses consist of a mix of semantic and latent codes, ranging from pragmatic concerns (e.g., lack of resources or knowledge) to more philosophical concerns about the function of complaint handling in contemporary local government practice (e.g., the relationship between citizens and local government, negotiating the public interest, etc.). Unless otherwise indicated, phrases in quotes are direct quotes from the participants. six main themes were identified, from which drivers and barriers of effective complaint handling were derived.¹⁴

Theme 1: The Utility and Importance of Effective Complaint Handling

As a point of departure, participants expressed an interest in better managing complaints and identified complaints as helpful in improving local government services and constituent trust in local government. First, participants argued that complaints could reveal instances in which local government services fell short of organizational expectations. For example, participants understand complaints as a tool to “maintain service levels. Interestingly, participants distinguished between ‘complaints’ and ‘service requests,’ with the latter often being used to refer to instances where local government services did not align with established policy and procedures (e.g., a citizen did not get their garbage picked up at the appropriate time). Beyond this, while some participants noted that complaints do not drive improvements, most participants recognized the future value in using complaints to improve services as complaints were perceived as containing useful information. For example, one participant stated:

I believe that when somebody is complaining about something, maybe even if it’s just a 10% sliver of truth to it, there’s probably something that’s broken...and *maybe something can be improved*. We always review [complaints] – what can we do differently? What worked well? What didn’t work well?

¹⁴ For a summary of these drivers and barriers, see Table 2.

In this vein, participants noted that while complaint handling is resource-intensive¹⁵, they appreciated the opportunity to respond to complaints since it allows them to correct an issue, and possibly improve service delivery.

In addition to an instrumental understanding of complaints as useful for maintaining services, participants also connected effective complaint handling to broader organizational values and goals. For example, one participant connected complaint handling to equity and inclusion in local government processes. Specifically, when referring to a new Equity, Diversity, and Inclusion program being developed by their local government, the participant stated,

Equity, Diversity, and Inclusion (EDI) and complaints handling are quite linked and to get better equity you have to have a clear, transparent, and open complaints process... If we can be open to diverse perspectives and ensure that all voices, especially the marginalized voices, are being heard, we are more likely to achieve equity. In that, you have to have pathways [through which] those marginalized voices can be heard because, more often than not, the marginalized voice doesn't want to speak up because of the negative connotations or negative outcomes of speaking up. So having a proper complaints process that is clear, transparent, and accessible without ramifications for speaking up will really help ensure you're getting equity in place.

Making this link between accessibility to complaints processes and EDI initiatives within the organization highlights the possibility that effective and standardized complaint handling may contribute to responsible, democratic governance, more generally, by ensuring all citizens have opportunities to participate in local government. Given these observations, drivers of effective complaint handling at the local government level are *viewing complaints as valuable ways to operationalize EDI policy issues, improve service delivery, and contribute to good democratic governance*.

Despite perceiving complaints as a valuable source of information, participants described difficulties when determining which complaints are useful for improving services. Participants

¹⁵ See the following section for a more in-depth discussion of this theme.

indicated that a key challenge of managing complaints is identifying which complaints are “rational,” “legitimate,” or “logical,” or, conversely, which complaints were matters of ‘individual interest’ or the ‘public interest.’ Wagenaar’s (2004) and Bartels’ (2018) understanding of ‘practical judgments’ is useful here. Wagenaar (2004) argues that “the problem that administrators face is to arrive at reasonable, acceptable, and feasible [judgements] under conditions of high uncertainty” (p. 650). In other words, the everyday work and practices of administrators involves exercising ‘practical judgments’ to respond to uncertainty in a reasonable manner. Bartels (2018) furthers this observation by arguing that ‘practical judgments’ are informed both by pre-held, formal knowledge as well as emergent understandings of ‘the situation at hand’. In the BC local government context, exercising practical judgments about complaints is central to determining how useful a complaint is for improving services.

Whether a complaint was valuable as a driver for improvement was determined through various methods, including the volume of complaints received about an issue and how ‘obvious’ or ‘common sense’ the issue is. As mentioned above, participants employed the term ‘service requests,’ rather than ‘complaints’ to refer to situations requiring an ‘individual’ response, such as ensuring garbage is collected after a complaint that a citizen’s garbage was not collected. ‘Service requests’ were not treated as valuable inputs for service improvement since, for the participants, service requests indicated situations where local government services did not meet expectations, not that there is a fundamental issue with the organization’s policies or procedures. However, participants also indicated that ‘service requests’ could become matters of public interest if enough ‘service requests’ arose about a particular issue. To this point, one participant indicated that they would like to track the volume of complaints raised about particular issues as follows: “What I would like to find is very similar to injury management where you find that

group that keeps slipping and falling... Is there a way we could actually track and make sure we're covering off these *regular things that are coming up?*” In this example, complaints were viewed as legitimate when they were raised multiple times. Similarly, participants pointed to complaints raised by organizations, such as Neighbourhood Associations, as being more legitimate because they speak on behalf of multiple people.

In contrast, other participants argued that they did not require receiving multiple complaints to improve services. Instead, complaints were valued for how ‘obvious’ the issue was. One participant described their experience of using complaints to drive improvements:

We had one complaint about somebody saying your minimum charge on drywall [which could have asbestos in it] is too high. We recently made changes for that because we really want people to bring that stuff to the landfill so we can bury it properly... If the minimum charge is driving people to take one sheet away and dump it in the forest, that's not what we want. *In that way, we don't need a whole bunch of complaints to make a policy change.* We can say, ‘this circumstance highlighted something that in retrospect is quite clear.’

As such, a challenge within effective complaint handling is making practical judgments to determine which complaints are ‘valid’ and the extent to which complaints will be used to improve services. As such, a barrier to effective complaint handling is *viewing complaints as having limited utility for improvements, and the uncertainty of practices associated with determining the utility of complaints (e.g., determining whether complaints are ‘rational’ or ‘obvious’)*.

Theme 2: Doing More with Less, or “We try to cut corners where we can.”

The central overarching theme across the dataset is that complaint handling occurs within a context of limited resources. As will be explored, complaint handling at the local government level in BC occurs within a context of limited resources and a concern for best managing resources to meet the needs of citizens. In this way, many of the concerns raised by scholars of

pragmatic municipalism described in the previous chapter is shared by the participants in this study. Specifically, the participants illustrate that “local governments operate within the boundaries of community need and capacity” (Kim & Warner, 2016, p. 793) and work to balance these two concerns. As such, participants’ understandings of effective complaint handling were constrained by their available resources. In practical terms, while the (un)availability of resources was perceived as a driver or barrier of effective complaint handling in the literature review for this study (see Table 1), the resource-limited context in which local governments operate informs administrators’ approaches to complaint handling and constrains the mechanisms available to these organizations. As such, the drivers and barriers described in this chapter are premised on and respond to resource scarcity.

Concerns around limited resources were expressed through several different areas. First, participants noted that, particularly in smaller local government organizations, communications and complaint handling work is often completed “off the side of the desk” by senior leadership roles, such as CAOs. “Off the side of my desk” is an often-used phrase that refers to work tasks that need to be completed but are not understood as core work priorities, typically due to resourcing constraints. In this context, participants noted that while larger organizations have hired dedicated communications and complaint handling staff, smaller organizations do not have the resources to do so. As such, complaint handling is often conducted by CAOs “off the side of their desk” in addition to their other work priorities.

Second, in response to limited resources, participants needed assurance that the actual mechanisms of complaint handling are not more resource-intensive than necessary. When discussing the sophistication and practicality of their complaint tracking spreadsheet, one participant stated,

At this point in time, I don't know if the energy needs to be spent on some big fancy tracking system... It's not the right amount of energy I should be spending on just having some sort of spreadsheet. That may not be the best value of my time or staff time.

As an alternative, the participant noted that they “just take it right down to the bare bones” by employing a complaint handling system that is less sophisticated and detailed and, as such, less resource-intensive and easier to operate. The participants identified a trade-off in that the resource limitations they face limit their ability to employ more advanced complaint handling functions, such as reporting out and robust data analysis.

Subtheme 2.1: Managing the Unusually Persistent Complainant

A central challenge identified by each participant was achieving resolution with “unusually persistent complainants” (UPCs) and equitably allocating resources, so such complainants do not monopolize local government resources.¹⁶ There is a considerable body of academic and grey literature on UPCs in legal and administrative processes (Commonwealth Ombudsman, 2009; Lester et al., 2004; Mullen & Lester, 2006; New South Wales Ombudsman, 2012; Skilling et al., 2013; Sourdin & Wallace, 2014; Wheeler, 2014). It is estimated that UPCs made up “a fraction of one per cent” of those who raised complaints but consumed between 15-30% of all resources allocated for responding to complaints in UK health services in the early 2000s (Mullen & Lester, 2006, p. 335). Because of this, dealing with UPCs significantly impacts the services available to other complainants and constrains available resources (Skilling et al., 2013). As described previously, Fountain (2001) connects this issue to a ‘paradox of public

¹⁶ The academic literature distinguishes between ‘persistent complainants’ and the often-used term ‘vexatious complainant.’ “Vexatious” has “traditionally been applied to the troublesome client who makes dubious but oft-repeated complaints or desires to institute litigation which in fact is groundless” (Freckelton, 1988, p. 127). In contrast, unusually persistent complainants pursue justice through “[sending] voluminous and repeated communications setting out their case and pleading for, or demanding, help” (Mullen & Lester, 2006, p. 335). Vexatious complainants and persistent complainants are often framed as existing along a spectrum of ‘querulous behaviour,’ but are mainly distinguished by the former’s reliance on pursuing their grievance predominantly through courts and tribunals.

sector customer service’: enhancing “customer service is likely to exacerbate political inequalities even as it improves some aspects of service production and delivery” (p. 56). Fountain argues that customer service can threaten the pursuit of political equality due to the private sector roots of customer service strategies. While private sector organizations are more likely to provide higher levels of service to their vocal customers, doing so in the public sector would be antithetical to democratic values. As illustrated below, the participants negotiate this paradox in practice when balancing customer service with serving the broader public interest.

Historically, academic literature has referred to UPCs in medical terms, arguing that UPC behaviours are associated with “querulousness,” a psychiatric diagnosis (Wheeler, 2014). Querulousness describes a pattern of behaviour involving the “unusually persistent pursuit of a personal grievance in a manner seriously damaging to the individual’s...interests, and disruptive to the functioning” of the organizations attempting to resolve the claims (Mullen & Lester, 2006, p. 334). Approaches have been articulated to mitigate the impacts of UPCs, including “better process explanations, early triage into specialized complaint handling approaches, having clear policies and frameworks and specialized skills to support those that may have ‘obsessive and unreasonable’ behaviours” (Brennan et al., 2017, p. 644). As such, while complaints can be an effective form of input to inform and improve local government practices, the extent of influence complaints can have is limited by the value judgments of local government administrators.

Participants in this study used a variety of terms to refer to UPCs, including ‘frequent flyers,’ ‘STPs (meaning ‘the Same Three People’), ‘Squeaky Wheels,’ and ‘Repeat Offenders.’ Two main themes recur across the dataset. First, participants discussed the importance of effectively managing complaint handling resources so that UPCs do not take away from other citizens’ quality or quantity of services. UPCs were viewed as being onerous and resource-

intensive to deal with for several reasons, including the volume of communications they send, the range of channels they use to communicate (i.e., rather than using one channel, like email, UPCs communicate through multiple channels), the perspective that it is impossible to resolve their complaints¹⁷, and that they behave inappropriately. Regarding the impossibility of resolution, one CAO stated, “sometimes...you’re never going to be able to make that person happy, especially in a small municipality... We have limited resources too.” In addition, one participant noted that “the thing that surprises me the most about this job is the amount of times I have to talk to a member of the public about...how inappropriate their behaviour is.” Another participant notes that while it is important to recognize that some UPCs suffer from mental illness, these complaints are often the most resource-intensive and challenging to manage. Because of this, participants emphasize that, as public servants, they are responsible for the broader collective interest. This perspective was typically articulated as follows:

In the last year, we responded to more than 75 requests from you alone, whereas we still have many first-time service requests. We’ve answered your questions. We have other people waiting... I have [50,000] residents in this community that all deserve an equal opportunity to access services.

Participants connected this concern with democratic values by arguing that “it’s inconsistent with living in a democracy that public officials are able to determine what quality of service you’ll get based on your attitude.” In short, the participants described ensuring UPCs do not “take up more than their fair share of resources” as essential to serving the public interest and upholding democratic values.

A second concern under this subtheme was how to effectively deal with UPCs to mitigate the number of resources they take up. The administrators pointed to strategies ranging from harmful tactics like ignoring the UPC to more proactive strategies of implementing Respectful

¹⁷ A participant referred to the impossibility of resolution or closure as a “black hole of issues.”

Workplace or Unreasonable Complainant Conduct policies. These policies set out the threshold at which UPC conduct becomes ‘unreasonable’ or ‘abusive’ and staff responsibilities towards these individuals once that threshold has been reached. Some techniques used to respond to unreasonable behaviour are service/communication restrictions and bans, escalating the UPC to managerial staff, or ending the communication immediately without instituting a ban (e.g., ending the phone call, asking the individual to leave the building).

A third theme articulated by the participants relates to the quality of complaints made by UPCs as inputs for making improvements to policies and procedures. Again, the concept of ‘practical judgments’ is useful here. UPCs were often described as irrational, illogical, or obnoxious. Further, UPCs are conceptualized as holding polarized positions or being intractable. In these ways, the complaints of UPCs are often represented as overly particularistic to be valuable inputs for public sector decision-making. In some cases, the interests of UPCs are viewed as antithetical to the public interest. Because of this, complaints made by UPCs were less likely to be understood as useful inputs for service improvements. Participants identified some reasons for this, including that the complaint is about an issue outside of the local government’s jurisdiction, the complaint is based on an incorrect understanding of the organization’s policies or procedures, or that the complaint is not based on facts or suffers from logical failings (e.g., conspiracy theories, etc.). It is important to note that administrators’ practical judgments about the usefulness of complaints is informed by both pre-held knowledge (e.g., knowledge of organizational policies, legislation, etc.), previous experiences in complaint handling (in general and specifically with the individual complainant), and an emergent understanding of ‘the situation at hand.’

In short, participants identified limited resources as a central challenge in effectively handling complaints, particularly in smaller organizations. Specifically, the challenges of resource limitations are expressed by complaint handling being performed “off the side of one’s desk,” having a “bare bones” complaint system, and difficulties associated with dealing with UPCs. In response to these challenges and following the ethos of pragmatic municipalism, participants identified several strategies to support effective complaint handling to meet the needs of their citizens.

As such, UPCs pose three barriers to effective complaint handling:

- *UPCs consume a disproportionate amount of complaint handling resources, negatively impacting administrators’ ability to equitably distribute complaint handling resources.*
- *Complaints made by UPCs can be viewed as being too individualistic to be valuable.*
- *UPCs can exacerbate political inequality as they often demand a higher level of service compared to other citizens.*

Subtheme 2.2: Managing High Service Expectations with Limited Resources

All participants pointed to managing their constituents’ expectations of service and identifying an appropriate level of service as a key challenge of complaint handling with limited resources. When speaking about service expectations, one CAO stated:

[Constituents] want their taxes extremely low, but the level of service to be really high, and they look at the number of staff and they think, “you have way too many staff in your bloated organization. Why do we have so many staff for such a small community?” The reality is that when you look at it on a per capita basis, we have half the amount of staff per capita as [larger municipalities]. When you start to do the analysis, you realize we’re actually dramatically under-resourced.

To deal with high expectations, CAOs described the importance of establishing a level of responsiveness to citizen inquiries that balances responding within a reasonable amount of time and establishing a sustainable level of service. This challenge often presented itself in

discussions of the speed at which local government staff should respond to citizen complaints and inquiries. One illustrative example of this is the following: “We’ve hired a Communications Manager...but I’m really cautioning them about how quickly we’re responding on Facebook, because once you establish that level of service, you can’t go back.” Another participant noted that “sometimes instant information is not enough, so we have to back off a little bit because the expectations are just outrageous.” Participants pointed to how private sector service experiences have inflated citizens’ service expectations for the private sector. For example, one participant recounted recent conversations their Council has had around response times:

The public is expecting [immediate responses], so we’re having conversations on how we communicate and engage with the community and how responsive we want to be. How responsive are people expecting us to be when you can go on Telus’ website at 10:00 pm, and the little chatbot pops up... Almost any website you [go to has a chat bot].

As such, citizens’ high expectations of local government services and responsiveness have posed challenges how local government administrators can meet these expectations with limited resources. These findings reflect an additional barrier to effective complaint handling: *private sector customer service experiences heighten service expectations for local governments, which poses a challenge to local governments’ ability to satisfy citizen expectations.*

Subtheme 2.3: Lack of Knowledge about Best Practices in Complaint Handling

Participants identified a lack of knowledge about best practices or the complaints policies and procedures of other BC local governments as barriers to improving their complaint handling practices. Given resource limitations, participants noted that they did not have the capacity to research and develop complaint handling procedures and policies “from the ground up.” In addition, the participants noted that many of the resources available that were published to assist public sector organizations in developing evidence-based complaints procedures and policies

(e.g., recent BC Ombudsperson guide) were too general and did not reflect the realities and challenges experienced by local governments. Specifically, the participants noted that these resources and the solutions they recommend are often not “scalable” to the resource capacity of smaller local governments. For example, when asked what would be useful for the complaint handling guide being developed by the Research Team, one CAO shared:

I would like to see that a [complaint handling] guide be somehow scalable, making sure you recognize that there are communities that have only 25 to 50 staff. I live in that world right now, being in a small organization, and I recognize that some of these guides that we see are not attainable for a smaller organization to do it well or even to roll it out.

In response, some participants noted that having access to other local governments’ complaints policies could help inform their policies. In addition to enabling administrators to implement complaint handling policies and procedures with limited resources, best practices and solutions generated by other local governments are valued as they are understood as solutions that “work here” (Coaffee & Headlam, 2008, p. 1587; see p. XXX). As such, the best practices of other local governments are seen as valuable because they are grounded in the realities and context of local government in BC and are adapted to the citizens’ expectations and material constraints inherent to the BC local government system. As such, *sharing complaint handling knowledge and best practices between local governments* is a driver of effective complaint handling. Additionally, a barrier to effective complaint handling is *the current involvement (or lack thereof) of local government partner organizations, which have not published resources to improve complaint handling practices that reflect the particular realities faced by local governments in BC.*

Theme 3: Customer Service-Oriented Organizational Culture

The participants described at length the connection between complaint handling practices and organizational culture informed by customer service values. As explored below, having a customer service-oriented organizational culture lead to two dominant modes of effectively managing complaints with limited resources: prevention, or mitigating complaints before they arise, and handling complaints informally at the frontline level. Organizational culture is often identified as an antecedent to effective complaint handling in grey literature. For example, in their recent report, the BC Ombudsperson (2020) states, “complaint processes must be supported by a strong organizational culture that views complaints as a key way to receive feedback from the people using the organization’s services” (p. 5). Such an organizational culture embeds using complaints to inform and improve an organization’s practices (Ombudsperson, 2020).

Academic literature, particularly the field of ‘the learning organization’, has emphasized how an open organizational culture can enable innovation (Daher, 2016). Scholars have argued that organizational cultures that value learning allows organizations to “not only maintain and share its knowledge, but also learn new insights related to responding to diverse demands” (Choi, 2020, p. 724; Joo & Shim, 2010). Organizational learning culture is essential to fostering an environment that supports development and innovation to improve services and performance. Additionally, scholars have pointed to importance of organizations recognizing and assuming risk when cultivating a learning environment (Glennon et al., 2019; Olejarski et al., 2019; van Breda-Verduijn & Heijboer, 2016). Risk in learning organizations emerges from diversifying the sources of knowledge from which the organization draws to improve its services, practices, and procedures. Specifically, Joo and Shim (2010) emphasize increasing employee empowerment as a key aspect to cultivating a learning organization, but also opens the organization to risk. In the complaint handling context, organizational cultures that value learning enables organizations to

receive, respond to, and learn from citizen complaints, *as well as improve their complaint handling practices in response to citizens' demands and expectations.*

Across the dataset, three dominant modes of organizational culture were identified: open, defensive, and closed. Defensive and closed organizational cultures and behaviours were viewed as antithetical to effective complaint handling practice. For example, one participant stated that “it can make our staff a little bit defensive [when they are the subject of a complaint]. There isn’t a lot of willingness to take a look at complaints when staff get defensive.” While no participants identified their organizational culture as being closed, some described the challenges of changing their corporate culture when the organization had been closed historically: “The municipality had a culture of ‘you can talk until you’re blue in the face, but they won’t listen, or they don’t care.’ So, I’m trying to build a culture of listening and understanding and being responsive.”

In contrast, every participant recognized that having an open and customer service-oriented organizational culture as central to effective complaint handling practice. Participants emphasized the importance of leadership when developing and sustaining such a culture:

It has to come from the top. If your CEO (Corporate Executive Officer) isn’t buying into it or isn’t doing it and being an example for it, it’ll never work... A whole shift in the overall culture for the organization needs to come from the top.

Participants argued that while frontline staff may not be initially enthusiastic about complaint handling, leadership support and open communication will create buy-in. An open organizational culture was identified as key to understanding complaints as helpful information to improve local government services and processes. Participants contrasted this to more closed organizational cultures that prioritized the expertise of local government staff above citizen input. One participant captured this sentiment by indicating, “we know what we need to do.”

Having an open organizational culture was often articulated as having a customer service orientation. Scholars have argued that a customer service orientation in public sector organizations better enable organizations to account for and understand the needs, requirements, and expectations of customers, often while better managing resources (Ludwiczak, 2014; Thomas, 2013; Wagenheim & Reurink, 1991). In the present study, one participant characterized the relationship between local governments and their constituents as a “customer service relationship.” The participants emphasized that a customer service orientation is integral to effective complaint handling in various ways. First, participants indicated that customer service should be ingrained in local governments’ organizational culture to respond to the pressures of meeting increased demands and expectations with limited resources. One participant noted that customer service is more central to local government than other levels of government:

I don’t think you go into municipal government...if you don’t understand you’re on the front lines and that you’re pretty much the first place that any citizen comes to when they have a government complaint. We get complaints about all sorts of things that have nothing to do with municipal government and that we have no control over, but we tend to try and move people along to where they need to go.

Another participant described the broader shifts in public services from more bureaucratic, technocratic decision-making to customer service-oriented and responsive decision-making and service provision: “It’s a different world from when I started... Now, we need to be customer focused.”¹⁸ Another participant reflected this transition by emphasizing that they have worked with staff to be more customer service-focused and less “bureaucratic or unreasonable.”

Second, participants acknowledged the importance of screening for customer service skills when hiring new employees and ensuring existing employees receive training to improve their customer service skills. Regarding the former point, participants pointed to the difficulties

¹⁸ While not articulated in these terms, these observations reflect the broader shifts encompassed under NPM.

of training staff, especially frontline staff, to “think the right way” after they have worked in government previously. Instead, participants describe shifting their hiring tactics to screen for employees with a customer service skillset. These hiring practices begin for leadership positions:

We didn’t hire somebody that has a local government background as our Director of Human Resources (HR)... We want to get the right people because you can train people to do just about anything, but if you can’t get them thinking the right way, especially the front-facing staff, it is very difficult to change that. The [Director of HR] was hired and she came from the customer service industry as a bank lead HR Director there.

Additionally, there is a focus on these hiring practices when recruiting employees for frontline positions or roles that frequently interact with the public. For example, one CAO stated that “most of my staff already had that [customer service training] when I hired them. I think it’s in my interview notes. It is one of the criteria we hire for because we are such frontline folks.”

Beyond hiring practices, participants also emphasized the importance of ongoing training for staff, specifically regarding customer service skills, conflict de-escalation, and active/empathetic listening. Staff from one participant’s organization stated that resources and training to support staff to be more comfortable in high-conflict situations can help them “turn a complaint into a positive solution or a positive outcome.” However, the frequency and quality of training required for local government employees vary across contexts. Some organizations require quarterly training using a mix of online and in-person mechanisms, while others granted employees access to online training webinars but did not require staff to undergo training. Lastly, some participants pointed to informal review and coaching practices, where management provides feedback to frontline staff on how complaints were managed and how they can improve when responding to future complaints. Given this, a central driver for effective complaint handling is *an open organizational culture based on a customer service lens, which is reflected*

and supported by organizational leadership and informs all aspects of the organization, including training, recruiting, and empowering staff.

Participants often referred to examples from the private sector as goals for how they would like their organizations to function when providing effective customer service. For example, when discussing the importance of directing citizens to the correct points of contact and providing accurate information, one CAO said, “It goes back to 101 in customer service... like when you go into [a grocery store] and ask, ‘where is the sugar?’ They say ‘Okay, I’m going to walk you over and make sure it’s there... Oh, we’re out of it right now? Let me check on it.’ So, it’s the same as any complaint.” Another CAO, when commenting on promoting a customer service orientation throughout the organization’s culture, stated succinctly, “We’re going to be the Google of local government.” As such, another driver of effective complaint handling are *broader shifts in public sector governance towards a customer service framework that is informed by private sector practices.*

Theme 4: Prevention: Proactive Communication, Citizen Engagement, and Public Education

As noted previously, participants indicated that handling complaints can be resource-intensive, and it can be challenging to achieve meaningful resolution with complainants. Because of this, the participants identified several ‘upstream’ strategies to prevent complaints before they arise. These strategies are comprised of three broad categories: proactive communication, citizen engagement, and public education. First, many participants discussed the importance of proactively communicating with their constituents before any changes came into effect or informing constituents of policies and procedures around particular issues. In addition to

providing information to constituents, this strategy also allowed local governments to “tell the story.” One example of this strategy is as follows:

We try to deescalate snow clearing complaints by having a robust communication strategy before winter snow on our website, on Facebook, in our newsletter, through our Council President. All of it's geared to managing the complaints that we're going to get. To me, this piece is about being proactive and saying, 'let's tell the story,' and managing it that way.

Within the context of contracting out services to private organizations, one participant noted that the communication expectations of contractors should be delineated in service agreements.

Participants also pointed to the role open data initiatives can play in proactively communicating with the public and promoting transparency. In short, proactive communication is seen as a strategy to ‘get out in front of’ and prevent citizen complaints by providing information, managing expectations, and controlling the narrative.

Participants also noted the importance of engaging meaningfully with citizens to increase satisfaction with local government services and, thus, reduce complaints. Some CAOs mentioned the necessity of “getting in front of the public and listening to the public, rather than having us tell the public our story” to understand the public’s needs and expectations. To accomplish this, some organizations created mechanisms for citizens to share feedback, typically through a website or citizen engagement app. Related to this point, one CAO indicated that the conventional local government techniques of engaging the public might be no longer effective or meaningful in some contexts:

We had a couple of open houses that were very poorly attended, and we realized we needed to go back and rethink how we engage the public. We received complaints about people feeling like we're not listening because they didn't engage in the process we put together.

Participants also recognized engaging with Neighbourhood Associations as a strategy to gather information, manage expectations, and create buy-in among their constituents. Neighbourhood

Associations were also connected to proactive communication since they were often tasked with communicating messages to their constituents. Citizen engagement, for the participants, fulfills a variety of purposes, ranging from gathering information about citizens' ideas and expectations to proactively communicating changes in local government services.

Lastly, participants shared that public education is a central aspect of preventing complaints before they arise. Some CAOs stated that citizen complaints often emerged, in part, because of citizens' lack of knowledge about the responsibilities and authority of local government. Specifically, participants argued that citizens are often unfamiliar with municipal processes and responsibilities until citizens need to interact with their local government. For example, one CAO stated, "99% of the time, [we receive complaints] because people just aren't educated or they're new to the community, or they just don't understand what local government is." Because of citizens' ignorance about the role of local government, participants indicated that they often receive complaints about services that they do not have jurisdiction over, such as hydro and utility issues, and broader systemic policy issues, like homelessness and housing. To mitigate these complaints, some local governments have prioritized educating the public about local government responsibilities and processes informally (e.g., on the phone in response to citizen inquiries) and formally (e.g., through online publications). Some participants connected public education to citizen engagement by stating that they often respond to questions from the public garnered through citizen feedback mechanisms on their public webpages.

As illustrated in the previous references to apps and webpages, new technologies have enabled local governments to efficiently and effectively interact with citizens to support the goals of preventing complaints. To this point, Mergel (2013) introduces the categories of 'push' and 'pull' to describe how public sector organizations commonly use social media. 'Push' refers

to promoting transparency, by developing a “unidirectional communication, with the purpose of sending public information to increase transparency and to improve trust and accountability” (Criado & Villodre, 2021, p. 258). ‘Pull’ refers to the engagement capacity of social media, where the purpose of social media is to “generate engagement with citizens, improving decision-making and getting feedback from them” (p. 258). While there are risks associated with using social media (see Theme 6 below), scholars generally recognize that public sector organizations can use social media productively to provide information and engage with the public (Criado & Villodre, 2021; Hisham et al., 2015; Khan et al., 2014; Lovari & Materassi, 2021).

These findings illustrate a key driver and strategy for effectively handling complaints: *emphasizing upstream strategies to prevent complaints, specifically public education, citizen engagement initiatives, and proactive communication.* A further driver apparent in these findings is *the emergence of technological improvements that enable local governments to better communicate with citizens.*

Subtheme 4.1: Handling Complaints Informally

Some participants indicated that limited resources have led to a focus on informal methods of complaint handling. I understand handling complaints informally as a preventative strategy as it is focused on resolving complaints before they are dealt with through an organization’s formal complaint process. In her study, Gulland (2011) notes that most documents on best practices in complaint handling include an early ‘informal’ stage in model complaint handling procedures and processes (for a recent example, see BC Ombudsperson, 2020). While much of the scholarly literature on informality has focused on informal practices in the Global South, recent studies have emphasized the importance of informal practices as a method of governance in the Global North (Schoon & Altröck, 2014). Further, more recent studies have

challenged the dichotomy of ‘formal’ and ‘informal’ practices to argue that “informal practices and arrangements do not only take place outside of officially sanctioned procedures” but can also “form an inseparable part of these procedures” (Jaffe & Koster, 2019, p. 564). Informality has been identified as an emergent strategy in local governance to manage complexity with limited resources (Pill & Guarneros-Meza, 2020). Specifically, in the complaint handling context, Gulland (2011) found that informal complaint handling was viewed as a cost-effective method to respond to complaints, noting that participants in her study “agreed that it was desirable that issues should be dealt with as informally as possible” (Gulland, 2011, p. 486). However, it is important to note that there are drawbacks to informal complaint handling, specifically that informal complaints are often not recorded and that there is a lack of consistency in how complaints are responded to (Gulland, 2011).

In the present study, participants identified empowering staff to resolve complaints on the frontline as an informal method to resolve complaints before proceeding through the formal complaint system. For example, one CAO said:

It’s my practice to empower staff to be able to handle that complaint right when they receive it. It doesn’t matter if it’s our summer parks staff out in the field. Empower them, making sure they have the information to be able to answer questions and be able to resolve it right there... I want to empower staff to be able to try and resolve that item right there and, if they can’t, walk them through [whom to direct it to]. If it means they’ve passed it on to [senior management], that’s fine.

While this CAO noted that resolving complaints informally can lead to inconsistency in outcomes, they indicated that “we can ultimately have better resolutions even if we have a few mistakes along the way,” and by ensuring staff receives training and accurate information to resolve complaints. For this CAO, informal complaint handling allowed the local government to respond to complaints with limited resources effectively:

We've empowered staff and they're dealing with 90% of [complaints] and only 10% are making it to me. That's great... It's probably not the right amount of energy that I should be spending on having some sort of [formalized tracking systems]. *That may not be the best value of my time or staff time.*

In short, informal complaint handling is understood as an effective method for responding and managing complaints, particularly in the context of limited resources. As such, *empowering staff to handling complaints informally* is a key driver of effective complaint handling and emerges from the earlier drivers of organizational culture and effectively training staff to develop their customer service skillset.

Theme 5: Structural Barriers to Effective Complaint Handling

Participants pointed to key areas in which local government structures acted as barriers to effective complaint handling. First, participants acknowledged that “organizational silos” impeded an organization’s ability to implement a uniform and consistent approach to complaint handling. Organizational silos are “insular divisions that [focus] on a particular industry or activity” (Boxelaar et al., 2006, p. 122). In local governments, silos often take the form of various departments that are dedicated to delivering and administering different services (e.g., Bylaw Enforcement, Planning, Engineering, Development and Licensing, Arts and Culture, etc.). Most participants identified “siloeing” as impeding complaint handling to varying degrees. For example, one participant noted that the willingness to engage with complaints varies across departments, with departments with fewer front-facing responsibilities being the least responsive. Participants also expressed discontent with the variation in how each department handles and responds to complaints. For example, one participant stated:

Across departments, they handle it well, but the message might be slightly different. I would like more consistency in the approach and that's where it gets hard because now, we're getting into personalities. I really think it's important to hear and acknowledge a complaint and to validate it, but some staff may not be as willing to listen or to validate it and so their approach might be a little more

hardline. I think if we can have that consistency of approach across departments that would be a lot better.

Another participant also indicated that, as a principle of customer service, citizens should expect a consistent response to their complaints. Lastly, participants expressed that the different legislative and professional requirements across the departments can limit an organization's ability to implement a uniform complaints process. For example, one participant noted that departments with employees with professional designations (e.g., Engineers, Planners) might have specific complaints procedures through their professional colleges. However, it is also important to note that the degree to which departmental divisions impacted effective complaint handling varied according to the organization's size, with smaller organizations experiencing fewer negative impacts from "siloing."

Another structural impediment to effective complaint handling is the elected/political side of local government, the Mayor and Council. Multiple participants shared experiences where Councillors, rather than directing constituents through the official complaints process, became involved in the complaint and advocated on behalf of the constituent to resolve the complaint.

One participant stated:

[Council] has been advised they are supposed to direct complaints to staff, but this particular Council is not very good at that, and they get in the mix. That has not been a good scenario because then you get a Councillor who wants it fixed and wants everybody to be happy. Our policy is to tell Council to direct them to staff.

Additionally, as implied in the previous quote, Councillors' tendency to bypass the standard complaint process is bolstered by their status as elected officials. Specifically, participants noted that Councillors sometimes act as advocates to resolve complaints to "make everybody happy" and gain political capital. Participants noted that responding to complaints that Councillors have raised on behalf of citizens is more resource-intensive than responding to complaints through the

typical process since they typically seek to “bypass several layers of management” in their attempt to resolve complaints. Lastly, it is important to note that, in contrast to the comments made about Councillors usurping the complaints process, multiple participants believed their Councils were succeeding in directing citizens to complain through the formal process: “One of the nice things about our Council is that they have a great deal of respect from where that delineation is between administration and their role.” In short, the political motivations of Council can act as a barrier to effective complaint handling. However, the degree to which this occurs varies depending on the specific Council. Given this, barriers to effective complaint handling are *structural/institutional realities, specifically organizational complaint handling and Council involvement in complaint handling*. Extrapolating from these barriers, an additional barrier is a *lack of standardization in complaint handling practice across local government organizations through processes, policies, and procedures*. This additional barrier is revealed by the participants comments that effective complaint requires a consistent response to complaints across the organization.

Theme 6: Social Media and Complaints: “Facebook can be an enemy and an asset.”

The final theme discussed was how social media enables and, more often, impedes effective complaint handling. Under the subtheme 3.1 on Prevention, I described the role of social media as a driver. In this theme, I will explore how social media is a significant barrier to effective complaint handling. Most participants noted that their local governments have an official presence on social media, typically by running a municipal Facebook page. Participants identified official Facebook pages as practical tools to communicate to their constituents, share information, and receive feedback if resourcing allows. For example, one of the functions of

many of the participants' communications teams is to monitor the official Facebook page for complaints and redirect them to the appropriate department.

However, participants raised concerns about 'community' Facebook groups (CFG). Facebook allows for creating "groups" organized around specific topics, which allows members to interact with each other. Academic literature has focused on how Facebook groups produce 'echo chambers' (Grömping, 2014) and how groups reinforce individual and collective identity within political contexts (Ekström & Sveningsson, 2019; Merrill & Åkerlund, 2018). CFGs are Facebook groups that members of a community create (e.g., Town, City, Neighbourhood, etc.) to discuss and share information related to matters that concern the community. While academic literature on CFGs is limited, some recent studies have argued that CLFGs, particularly in smaller communities, can be problematic and lead to bullying (Clifford et al., 2020).

The participants supported these findings in their discussions of CFGs. Specifically, participants describe CFGs as being "overwhelmingly negative," "toxic," "volatile," and "nasty." Participants expressed that the content in CFGs can often be hurtful for local government staff to view. Another participant questioned the value of the input that emerges from CFGs: "[Our community's CFG], which is presented to be some sort of expert group that can criticize [the Municipality], typically has no clue what they're talking about." Because of this, participants noted that they do not participate in CFGs and do not monitor them for complaints. Specifically, complaints articulated in CFGs are not understood as part of the formal complaint management system, thus leading to situations where citizens believe that complaints they make in the CFG will be responded to by the local government. However, as one participant notes:

People believe when they're posting a message on...any Facebook group, the City needs to monitor it. We have 40 staff. We don't have time to have a person sitting there monitoring 15 different Facebook groups about complaints. For some reason, Councillors are heavily involved in these Facebook groups, so they

assume that [administrative] staff know about all these things that are going on and expect us to deal with these things.

CFGs impede effective complaint handling because citizens are often unaware that complaints made to CFGs are not formal complaints. Specifically, participants note that citizens who have complained in CFGs often do not submit formal complaints when they are reminded to complain through the formal complaint process. As one participant noted, “139 comments [on Facebook], not one received at the Village office.” In short, while social media can be used as a tool for communication and engagement externally, due to the phenomenon of echo chambers, lack of organizational resources, and citizens making complaints in CFGs rather than through the formal process, the participants view social media as an impediment to effective complaint handling. *Social media, specifically the emergence of CFGs are barriers to effective complaint handling.*

This section described the main themes that occurred across the participants in the study. From these themes, I identified the drivers and barriers of effective complaint handling at the local government level in BC, which are summarized in Table 2. Participants identified a range of intra-organizational, inter-organizational, extra-organizational, and interaction-specific drivers and barriers, which reflects how participants’ understanding of complaint handling is informed by micro-, meso-, and macro-level influences.

Conclusion

This chapter shared six main themes that emerged from the interviews with the participants and connected these themes to the drivers and barriers for effectively handling complaints at the local government level in BC. As a result, the study found that local government complaint handling occurs in a context of limited resources and material constraints, which limits organizations’ overall capacity for complaint handling, but has also led to the generation of unique solutions to accommodate the realities of local government. The final

chapter will explore the inherent tensions in public sector complaint handling emerging from its roots in private sector management techniques, and how public administrators encounter, negotiate, and resolve these ambiguities and tensions in practice. Drawing on this framing and the drivers and barriers developed in this chapter, I will make recommendations about how to improve complaint handling practice at the local government level in BC.

Table 2	
<i>Drivers and Barriers for Effectively Handling Complaints in BC Local Government</i>	
Drivers	
<u>Locus of Drivers</u>	<u>Drivers</u>
Intra-organizational	Open organizational culture based on customer service lens, including leadership support and buy-in (informs training, recruiting, and empowering staff) Empowering staff to handle complaints informally Complaint prevention strategies (e.g., public education, engagement, proactive communication) Standardized approaches to complaint handling in place through policies, procedures, and systems
Inter-organizational	Sharing complaint handling knowledge and best practices between local governments Local government partner organizations sharing best practices
Extra-organizational	Public sector shift towards customer service framework Technological improvements to better communicate with citizens
Interaction-Specific	Viewing complaint handling as valuable for learning and improvements and as central to good democratic governance
Barriers	
<u>Locus of Barriers</u>	<u>Barriers</u>
Intra-organizational	Closed, defensive organizational culture, including lack of management support and staff resistance to complaint handling Structural deterrents to effective complaint handling (e.g., Council involvement in complaint handling, organizational siloing) Lack of standardization across organization
Inter-organizational	Inadequate knowledge sharing between local governments Lack of involvement by local government partner organizations
Extra-organizational	Private sector customer service heightens service expectations for local governments Social media and CFGs
Interaction-Specific	UPCs can consume a disproportionate amount of complaint handling resources Viewing complaints as having limited utility for decision-making and improvements (e.g., only useful as ‘service requests’) Complaint handling can lead to issues with maintaining political equality UPC complaints can be viewed as being too individualistic to be valuable

Chapter 4: Discussion and Recommendations: Complaint Handling that ‘Works Here’

In this final chapter, I investigate what the present study reveals about broader theoretical considerations regarding complaint handling. Specifically, I argue that complaint handling at the local government level in BC is characterized by a series of tensions that emerge from the interactions between many of the concepts introduced in Chapter 1, such as understanding complainants as ‘consumers’ or as ‘citizens,’ the underlying philosophies of complaint handling, and the contrast between private and public sector values. From this theoretical framing, I will draw on the drivers and barriers identified in the previous chapter to make recommendations about improving complaint handling at the local government level in BC.

As a point of departure, it is helpful to outline what a complaint system *should* be. According to the BC Ombudsperson (2020), an effective complaint system should be guided by the following principles. First, a complaint system should be *accessible*, meaning that it should be easy for a wide range of people to voice their concerns. Second, a complaint system should be *fair* and based on two principles of procedural fairness, “the right to an independent and *unbiased* hearing/decision maker” and “the right to be heard” (p. 8). Third, a complaint system should be *person-focused*, meaning that organizations should be receptive to citizen expectations and demands for their complaint system. A person-focused system should also be flexible enough to consider and respond to individual needs. Lastly, a complaint system should be responsive, meaning that organizations view complaints as opportunities to improve or maintain relationships and services. A responsive complaint system ensures that “staff are empowered to respond to complaints quickly and that they do so in a non-judgmental and respectful way” (p. 9). Organizations should also respond to and resolve complaints promptly. These principles reflect best practices articulated by other Ombuds organizations (BIOA, 2007; NSW

Ombudsman, 2017; SPSO, 2020) and in scholarly literature, specifically scholars of DSD (Amsler et al., 2017; Amsler et al., 2020; Gill et al., 2016; Nabatchi & Bingham, 2010).

However, as the present study shows, when operationalized, these guiding principles represent a series of tensions and ambiguities that emerge from the complexity of public sector complaint handling and its origins in the context of NPM. First, as explored in Chapter 1, a central critique of NPM is that it privileges consumerist values, such as efficiency and understanding the citizen as a ‘customer,’ over other values traditionally held in the public sector, such as equality, justice, and fairness. In the context of complaint handling, these tensions in values play out when administrators make practical judgments to determine the appropriate amount of resources to respond to an individual’s complaint. Administrators often negotiate between the individual’s interest in resolving their complaint and achieving satisfactory outcomes and the public interest of ensuring one complainant does not take up a disproportionate amount of resources. These tensions are also apparent between ‘responsiveness’ and ‘fairness,’ wherein more efficient strategies of resolving complaints (e.g., informal, frontline resolution) may not afford a complainant the level of fairness in process and outcome that could be expected at a more formal level of complaint resolution (e.g., formal reviews, ADR process, etc.).

To illustrate this point, I will draw on the tensions between informal complaint handling practices described in the dataset and standardization. A recurring view expressed in the dataset and academic and grey literature is that complaint handling should be more standardized, requiring establishing policies, procedures, and guidelines to ensure consistent complaint handling practices across the organization. This view emphasizes that standardization is connected to fairness, accountability, and equitable treatment by the local government organization. Regarding the latter point, a standardized approach ensures that citizens are treated

equally and that their complaints are adequately investigated and reviewed, regardless of their personal characteristics. At the same time, informality is understood as a central strategy for effective complaint handling, which, by its nature, is not standardized and can lead to different outcomes depending on the staff member handling the complaint, the nature of the complaint, and the interpersonal relationship between the staff member and the complainant (Gulland, 2011). Rather than viewing the ‘formal’ and ‘informal’ approaches from a normative perspective, with ‘formal’ approaches being more desirable than ‘informal’ ones, I take a pragmatic view to recognize that both standardization and informal complaint handling are essential to effective complaint handling practice. The importance of both informality and standardization is also recognized in grey literature as it often identifies informal complaint handling as the first stage in a complaint management system. Combining standardization while empowering staff to resolve complaints informally is a strategy that “works here,” and the tensions between these concepts are negotiated and managed in practice by administrators.

In short, public sector complaint handling practice is characterized by a series of tensions that emerge from the obligations of public sector service providers to treat citizens equally and fairly and the customer service demands that emerge from the practices’ roots in NPM. This tension distinguishes internal complaint procedures and processes from the previous dominant forms of public sector complaint handling, namely external mechanisms (tribunals and ombudsman) that emphasized the rule of law, due process, and independence (Gill et al., 2020). In contrast, contemporary internal complaint procedures seek to ensure citizens can access fair and just redress for their individual complaints while ensuring they can be resolved in a timely and responsive manner while equitably distributing resources. These tensions and ambiguities characterize contemporary complaint handling practices given the obligations public service

providers have to political and legal values (e.g., equality, procedural and distributive justice) and the inherently individualistic orientation of complaint handling that emerged from NPM and private sector management techniques. Removing the former would make complaint handling unacceptable within a public sector environment, whereas removing the focus on individual interests would eliminate an important form of redress for citizens. As the study reveals, while barriers arise from these tensions (e.g., dealing with UPCs, ensuring equal treatment), local governments have introduced several practices to resolve these tensions in practice.

Recommendations

Drawing on this discussion and the drivers and barriers identified in the previous chapter, I will conclude by making recommendations about improving local government complaint handling practices in BC. As noted previously, complaint handling often occurs with limited resources, and, as such, any solutions or recommendations should be interpreted by each organization to reflect their available resource levels. This observation aligns with one of the guiding principles of DSD: “match the design [of a complaint system] to the available resources, including training and support” (Amsler et al., 2020, p. 14). I present six recommendations organized into three broad categories: developing a customer service-oriented organizational culture, introducing strategies to prevent and mitigate complaints, and managing unreasonable complainant conduct.

Develop a Customer Service-Oriented Organizational Culture

Recommendation 1: Develop a customer service-oriented organizational culture by instilling customer service and learning values and modifying existing hiring and training practices.

Grey and academic literature and the present study have illustrated the centrality of organizational culture to effectively handling complaints. The participants acknowledged that

organizational culture extends from organizational leadership, where organizations with defensive leaders may be less likely to effectively handle complaints and view complaints as valuable sources of information to improve services. To this point, the NSW Ombudsman (2017) stated that “the head of the organization and senior management should champion effective complaint handling as a way of achieving the organization’s purpose as well as the Government’s commitment to good customer service” (p. 4). Given this, organizations should prioritize instilling customer service values amongst their senior leadership through training and modifying hiring practices to recruit customer service-oriented leadership staff. To this point, the BC Ombudsperson (2020) suggests that senior leadership in organizations that value complaints should convey that complaints are a valuable source of feedback, foster a culture of openness, disclosure, and apology when complaints are made, and use complaints to improve services, procedures, and practices (p. 5).

Similarly, organizations should foster customer service values among organizational staff, particularly staff directly responsible for handling complaints. To accomplish this, organizations should provide ongoing training “to support staff with developing the skills needed to respond to concerns from service users” (Ombudsperson, 2020, p. 10). Organizational learning scholars have found that investments in building capacity and fostering an organizational culture geared towards learning positively impacted staff perceptions of organizational learning (Grealish & Henderson, 2016). There is a range of fields that staff could be trained in, including trauma-informed practice, dealing with unreasonable conflict, and conflict resolution. While participants in this study described contracting external practitioners to train their staff, others advocated for more informal training coordinated by senior organizational staff. Organizations should decide on what level of training to employ based on their available resources. Lastly,

organizations can also modify their hiring practices to hire staff with specific skills essential to effectively handling complaints. The BC Ombudsperson (2020) identifies such skills and qualities as empathic, non-defensive, analytical, creative, assertive, resilient, self-aware, and trauma-informed (p. 10). A best practice identified by participants in the present study is to consider hiring staff who have a background in customer service outside of the public sector.

Recommendation 2: Co-create a complaint handling policy with staff tailored to the organization's needs.

Another best practice for local governments to improve their complaint handling practice is to co-create a complaint handling policy between leadership and frontline staff. Complaint policies serve various purposes, including defining what complaints are, the role of different staff members in the complaints process, and is an effective tool for managing citizen expectations about complaint handling (BC Ombudsperson, 2020; NSW Ombudsman, 2017; Northern Territory Ombudsman, 2016). From an organizational culture perspective, developing a complaint policy allows organizations to identify the guiding principles of their complaints process (e.g., accessibility, fairness, learning, etc.) and how these principles impact the complaint handling work of individual staff members. For example, in their model complaints policy, the Northern Territory Ombudsman (2016) includes an “organisational commitment” section, which sets out “the nature of the commitment [to the guiding principles] expected from staff” (p. 2). Developing a complaint policy also helps address some of the concerns raised about inconsistency in complaint handling and outcomes that emerge from organizational siloing. In short, complaint policies connect the everyday work of organizational staff to broader guiding principles that reflect the organization’s commitment to complaint handling. To support organizational capacity to implement a complaint policy, local governments should utilize the

various complaint handling policies that Ombuds institutions have developed (see, for example, BC Ombudsperson, 2020; NSW Ombudsman, 2017). When doing so, organizations should adapt their policies to reflect their specific organizational commitments and guiding principles and that the expectations articulated for staff within the complaint process reflect available resources.

Preventing and Mitigating Complaints

Recommendation 3: Prevent and mitigate complaints by emphasizing upstream strategies, such as proactive communication, public education, and citizen engagement.

The participants indicated that most of the complaints their local governments receive are due to a lack of information about changes to existing services or upcoming events or service interruptions and a lack of knowledge about local governments and their jurisdiction and responsibilities. In response, participants have introduced preventative, ‘upstream’ strategies to share information and educate the public to resolve complaints before they arise. The participants noted that implementing these strategies takes up fewer resources than handling individual complaints through their pre-existing complaints process. Given this, local governments should harness the communication tools available to them (e.g., website, social media, community newsletters) to proactively share information with citizens about any upcoming changes to services and educate the public on issues that are important to them.

Citizen engagement was also identified as an effective tool to mitigate complaints before they arise. While the literature on citizen engagement is vast, it is important to note that scholars have found that citizen engagement strategies have typically led to increased trust and satisfaction in government services (Cegarra-Navarro et al., 2021; Pakhale et al., 2016; Siebers et al., 2019; Zarei & Nik-Bakht, 2021) and knowledge about government services (Barth et al., 2020; Smith & Tolbert, 2004). Participants found that when they intentionally engaged citizens

in the design and planning processes of implementing new policies or redesigning existing ones, it was less likely that the local government would receive complaints about these services after the fact. As such, local governments should engage citizens through available channels, which depend on the organization's resources (e.g., online or in-person engagement sessions, online feedback tools). Taken together, these two points (proactive communication and engagement) reflect the 'push' and 'pull' functions of social media discussed previously (see p. 68; Criado & Villodre, 2021; Mergel, 2013).

This recommendation has implications for DSD. Scholars operating under the DSD framework have emphasized the importance of preventing and managing conflict "at its formative stages" (Amsler et al., 2020, p. 12) by introducing structures to resolve any disputes that may arise. This finding extends our understanding of complaint prevention and mitigation beyond disputes that may arise to encompass information- and knowledge-sharing, thereby situating effective complaint management within the broader framework of citizen-state relationships. In addition, this finding connects to the discussion of the 'differentiated consumer' introduced in Chapter 1. Simmons (2009) found that citizens use voice to express a range of perspectives for a variety of purposes and can express different identities through voice (e.g., citizens as a public service consumer or as a member of a political collective). As such, local governments should ensure that they enable citizens to express voice through a variety of channels, including through individualistic complaints procedures and group-based citizen engagement initiatives.

Recommendation 4: Train and empower staff to resolve complaints informally to prevent complaints from being handled through the established complaints process.

Local government administrators identified empowering staff to resolve complaints informally as an effective strategy while accounting for limited resources. Given this, local governments should harness the individual capacities of their frontline staff to accept and resolve complaints at the point of service. However, as described previously, there is a tension between handling complaints informally and ensuring the organization's complaint handling is standardized and upholds the values of fairness and accountability. In response to this tension, administrators pointed towards pursuing standardization while empowering staff to resolve complaints informally as a strategy that "works here." Informal complaint handling can be managed and improved by "standardizing" complaints handling by tracking informal complaints (Gulland, 2011) and training staff on effectively handling complaints, including how to interact with complainants and achieve desirable outcomes from complaints. In this way, staff training, particularly approaches like trauma-informed practice, cultural sensitivity, and conflict management training is key. While local governments may not implement all these strategies depending on their available resources, organizations should discuss what resources are needed to ensure informal complaint handling can be standardized to improve the consistency of responses and outcomes.

The effectiveness of handling complaints informally also has implications for the design of local government complaint systems. The three-tiered complaint system has been recommended as a best practice by Ombuds organizations (see, for example, BC Ombudsperson, 2020, p. 12). Tier 1 refers to point-of-service, or informal, complaints, whereas Tier 2 refers to complaints requiring internal review (i.e., complaints that could not be resolved at the point-of-service). Lastly, Tier 3 refers to complaints that require external review, often through legal or ADR processes, or through avenues available through oversight offices (e.g., Ombuds

organizations). Given how resolving complaints informally at the point-of-service allows local governments to resolve complaints with less resources than resolving them through a formal system, local governments to focus on developing their ability to resolve complaints at Tier 1.

Dealing with Unreasonable Complainant Conduct

Recommendation 5: Implement an unreasonable complainant conduct policy and train staff to deal with vulnerable and challenging complainants.

As many participants identified UPCs as a challenge to effectively handling complaints with limited resources, local governments should consider implementing ‘unreasonable complainant conduct’ policies. Some Ombuds institutions have developed ‘model’ unreasonable conduct policies that define when a complainant is behaving unreasonably, the roles and responsibilities of staff members in the complaints process, and overall approaches the organization can take to manage the unreasonable behaviour and protect their staff (e.g., service restrictions, limitations on communication, etc.) (see, for example, NSW Ombudsman, 2021). In addition to implementing a formal policy, local governments should ensure they have “adequate training and support in place to prevent and respond to unreasonable conduct when it arises” (BC Ombudsperson, n.d., p. 1). As such, local governments should consider training related to conflict resolution, trauma-informed practice, and communication.

Recommendation 6: Implement social media policies defining the organization’s social media involvement, ensuring social media presence reflects available resources.

Social media occupies a complex position with the local governance framework. On the one hand, participants and academic literature point to the utility of social media as a tool for sharing information and educating the public. On the other hand, the participants expressed that social media was not an effective tool for complaint handling as interactions on social media can

be toxic and harmful and can lead to confusion about whether a complaint made on social media is a legitimate complaint. Despite this, academic and grey literature has pointed to accepting and responding to complaints on social media as essential to an accessible complaint system. For example, the NSW Ombudsman (2017) emphasizes “making it easy for people to make complaints,” which involves diversifying the channels by which citizens can raise complaints, including emergent technologies like social media. These channels are often seen as more accessible and efficient than conventional channels, like letters, emails, or an online complaint form. Additionally, academic and grey literature have argued that vulnerable complainants often feel more comfortable interacting with government agencies through social media, particularly in the context of emotionally charged situations like making a complaint (Brennan et al., 2017; Motor Ombudsman, 2021).

However, although social media can support sharing information and promoting accessibility, there are many drawbacks and challenges to engaging on social media, as was explored in the previous chapter. Specifically, participants indicated that monitoring social media for complaints and requests for information is resource-intensive and can often be a negative or harmful practice. To this point, the NSW Ombudsman (2017) states that “to be most effective, social media requires constant monitoring and may need more resources than other contact methods” (p. 7). Additionally, complaint handling through social media often places additional requirements on frontline staff (NSW Ombudsman, 2017). The added responsibilities given to frontline staff could also give rise to many of the challenges described earlier regarding informal complaint handling, where complaints are responded to more efficiently, but there may be a variation in the responses to and outcomes of complaints.

In short, social media is viewed as a practical, cost-effective tool for prevention, or mitigating complaints before they arise, by facilitating communication and education with the public. Additionally, some sources argue that accepting and managing complaints through social media is central to ensuring an organization's complaints process is accessible, as citizens may find complaining through social media to be more efficient and less confronting. However, to be done well, complaint handling on social media is resource-intensive and may not be reasonable for smaller local governments with limited frontline staff capacity. Given these observations, the NSW Ombudsman (2017) recommends that "organizations should consider the role that new technologies can play, but care should be taken that any new methods adopted to facilitate complaints are properly deployed and supported" (p. 7). I recommend that local governments develop and publish a social media policy outlining for what purposes the organization uses social media (e.g., sharing information, responding to inquiries, accepting and responding to complaints), ensuring that their stated involvement reflects the resources that can be allocated to social media. The social media policy should be publicly available on the local government's webpage and easily accessible from each of the organization's social media accounts (e.g., Facebook, Twitter). Understandably, these policies will reflect a varying range of involvement in social media, given the different levels of resources available to each local government.

Conclusion

In this chapter, I explored what my findings about the drivers and barriers of local government complaint handling in BC reveal about internal public sector complaint handling broadly. I argued that public sector complaint handling is a complex practice due to the competing tensions between its roots in NPM and the commitments public sector organizations have to values like equality, fairness, and distributive justice. These tensions reveal the

uniqueness and importance of internal public sector complaint handling within the contemporary redress landscape in contrast to external complaint handling mechanisms (e.g., Ombuds institutions). Drawing on this framing, I recommended six brief recommendations for local governments to improve their complaint handling practices. As mentioned previously, these recommendations should be adapted to each organization's particular context and needs and should be implemented collaboratively with complaint handling staff.

Chapter 5: Conclusion

In this thesis, I contributed to two main areas of research. First, I explored the drivers and barriers of effective complaint handling in the BC local government context to understand this context further and make recommendations to improve local governance. Second, I drew on the findings in the BC context to reflect on internal complaint handling as a complex public sector practice that is informed by both its roots in NPM and its obligations to uphold political values. For the remainder of this chapter, I will revisit these central arguments.

The Drivers and Barriers of Effective Complaint Handling in BC Local Government

A central finding of this thesis is that local government administrators' understanding of complaint handling in BC is informed by the context of limited resources in which they operate. In contrast to the drivers and barriers described in the literature broadly (see Table 1), in which lack of resources is understood as one barrier among others, the drivers and barriers of effective complaint handling identified in this study emerge from and respond to the local government context in BC. A range of intra-organizational, inter-organizational, extra-organizational, and interaction-specific drivers and barriers were identified (see Table 2). This section also connected the perspectives of administrators in the BC context to the findings of scholars of pragmatic municipalism. Rather than refusing to handle complaints or limiting complaint handling capacity, administrators emphasized responding creatively to having limited resources by finding solutions that 'work here' to manage complaints, such as focusing on mitigating and preventing complaints before they arise and developing an organizational culture that values learning. From these drivers and barriers, I identified made six recommendations to support local governments in improving their complaint handling practices:

1. Develop a customer service-oriented organizational culture by instilling customer service and learning values and modifying existing hiring and training practices.
2. Co-create a complaint handling policy with staff tailored to the organization's needs.
3. Prevent and mitigate complaints by emphasizing upstream strategies, such as proactive communication, public education, and citizen engagement.
4. Train and empower staff to resolve complaints informally to prevent complaints from being handled through the established complaints process.
5. Implement an unreasonable complainant conduct policy and train staff to deal with vulnerable and challenging complainants.
6. Implement social media policies defining the organization's social media involvement, ensuring social media presence reflects available resources.

These recommendations account for the centrality of the context of limited resources and can be scaled depending on the resourcing capacity of individual local governments.

The Complexity of Internal Public Sector Complaint Handling Practices

The present study also reveals broader theoretical considerations for the practice of internal public sector complaint handling. In this thesis, I developed the idea of internal public sector complaint handling as a complex practice characterized by the tension between complaint handling's roots in NPM, which privileges cost-efficiency and the conceptualization of the citizen as a 'customer,' and the obligations public sector organizations have to uphold political values (e.g., equality, fairness, etc.). There are two key dynamics relating to this tension. First, this tension illustrates the uniqueness of internal public sector complaint handling, where citizens can achieve redress in a timely manner when public services fail. These complaints, in turn, can support organizations in maintaining service levels and improving their policies and procedures.

Second, this tension often leads to tensions between the individual-oriented nature of complaint handling and the collective values public sector organizations must uphold. An example of this provided previously is around informal complaint handling. Handling complaints informally enables citizens to have their complaints responded to in a timely manner at the point of service. Informal complaint handling also enables organizations to respond to complaints while using fewer resources. However, simultaneously, there is a trade-off between efficiency and values like fairness and accountability, given the subjective nature of responding to complaints at the frontline and the fact that informal complaints are often not tracked. This tension also emerges in the context of managing complaints made by UPCs, where organizations often need to make a trade-off between the complainant's interest of having their complaints responded to and the broader public interest to ensure a minority of citizens do not take up a disproportionate amount of resources. Organizations should account for these tensions when making design decisions about their complaint systems.

Avenues for Future Research

To conclude, I would like to reflect on two areas of future research that would have significant theoretical and practical import. First, this study focused exclusively on the perspectives and understandings of local government *leadership* (CAOs and COs) regarding complaint handling. However, this study reveals that a main site for complaint handling is among frontline staff, as empowering these staff to handle complaints informally helps local governments manage their resources better. Given this, future research should study how frontline staff understand complaint handling, how they render practical judgments in response to complaints, and the relational experience of handling complaints. This recommendation aligns with recent work from Koen Bartels (2013, 2015; Bartels & Turnbull, 2020), which focuses on

the ‘public encounter,’ or the everyday interactions between government officials and the public. For Bartels, studying the public encounter *itself* turns the researcher’s focus towards the relational nature of the public encounter, revealing the dynamic nature of the relationship between the citizen and the state and how these parties communicate to solve problems. In the complaint handling context, focusing on the public encounters around complaint handling has practical importance in that local governments would be able to understand how frontline staff resolve complaints in practice. This can inform future strategies to train staff to inform more consistent and desirable outcomes. From a theoretical perspective, focusing on the public encounter reconceptualizes the conventional understanding of complaint handling as transactional to understand complaints within the relational paradigms described in Chapter 1.

To this point, another area of future research is to understand how more relational approaches to complaint handling could operate in practice. In Chapter 1, I introduced several relational approaches to complaint handling, specifically Gill’s (2018) ‘relational-democratic’ approach (in contrast to the ‘consumerist-managerial’ approach), Simmons and Brennan’s (2013, 2017) recommendation to shift from a ‘delivery’ to a ‘relational’ model of complaint handling by using complaints to meaningfully drive improvements, and Doyle and O’Brien’s (2020) advocacy for a relational-democratic ‘imaginary’ or ‘vision’ of administrative justice, based on the values of ‘community,’ ‘network,’ and ‘openness.’ These relational orientations to complaint handling can challenge many of the more adversarial aspects of internal complaint handling and can also lead to a commitment to meaningfully learn from and values complaints. However, the democratic approach to complaint handling is not well developed in practice (Gill et al., 2020).

Because of this, I will suggest two starting points for research in this area. First, Doyle and O’Brien (2020) suggest that a relational-democratic ‘imaginary’ would value innovation that

emerges from uncertainty rather than requiring closure. This relates to the literature on the ‘learning organization’ described in Chapter 3, which argues that organizations that value learning accept a certain amount of risk and uncertainty to draw on diverse sources of knowledge to inform their services. This suggests that organizations that value learning may be better equipped to move toward a more relational-democratic approach to complaint handling. Second, in their discussion of therapeutic jurisprudence, Gill et al. (2019) suggest some strategies to improve contemporary complaint handling to mitigate the negative impacts of complaints on the complainant and organizational staff. First, the researchers suggest shifting from the current “antagonistic” system and introducing a “non-adversarial paradigm, involving techniques such as mediation that are solution-focused and oriented towards positive future outcomes” (p. 32). In the absence of these systemic changes, the researchers also suggest “soften[ing] the edges” of current complaint systems by emphasizing procedural fairness and communication and supporting staff with complaint handling responsibilities to recognize their roles as “therapeutic actors.” Under this framework, complaint handling staff should approach complainants and staff being complained about “with an ethic of care for their wellbeing” and employ “emotionally intelligent and empathetic communication practices” (p. 34). Building off these suggestions reconceptualizes complaint systems as mechanisms to resolve complaints *and* as sites of relational experiences between the citizen and the state.

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Appendix A

Sample Questions for Semi-Structured Interviews

1. What types of complaints do you most frequently receive?
2. Can you estimate the number of complaints you receive?
3. How do you deal with complaints?
 - a. and how well is that working?
4. What challenges do you face in handling complaints?
5. What strategies do you use to prevent complaints or manage/de-escalate them early on?
6. Do you use complaints to drive improvements?
7. Is there anything that would help you handle complaints more effectively?
8. How would a guide to handling local government complaints be most helpful to you?