



## BOARD REPORT

REPORT No.: 2024-04

MEETING DATE: FEBRUARY 15, 2024

SUBJECT: CORPORATE COMPLAINTS POLICY - UPDATE

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### RECOMMENDATION

THAT with respect to Report No. 2024-04 (Chief Administrative Officer Division) we, The District of Thunder Bay Social Services Administration Board, approve revisions to Policy BRD 01:119 – Corporate Complaints as presented;

AND THAT we authorize the Chief Administrative Officer to amend the policy with housekeeping changes, as may be required from time to time.

### REPORT SUMMARY

To present the Board with proposed revisions to the Corporate Complaints Policy for approval.

### BACKGROUND

A process review was undertaken beginning in 2023 to streamline the process for handling complaints and to enhance the 'contact us' form on the website to redirect to a shared email inbox. This inbox includes an auto-response with information about immediately available resources, including but not limited to after-hours Maintenance services and Intake. The team was also tasked with coordinating responses, specifically for corporate complaints, and tracking incoming correspondence.

The inbox presented challenges such as high volume, limited information, and being one of several points of contact with TBDSSAB. A mitigation plan was implemented, including a new auto-response with more information, a webform to collect a minimum amount of information, and a new tracking tool. These measures were piloted between August and November 2023, with limited use of the webform (10% of items entered into the tracking tool were from the webform). However, the new procedure and tracking tool provided clearer insight into the 80+ received.

Simultaneously, the team engaged with organizations of similar scope and size to discuss complaint handling policies, resulting in the revised Complaints Policy, Corporate Complaints Handling Procedure, and a recommendation for a general Complaints Procedure.

## COMMENTS

While there is an existing Corporate Complaints policy, it was deemed too broad by the team. Therefore, proposed revisions, as outlined in Attachment 1, include changing the policy title from Corporate Complaints to Complaints. Additionally, the operational content from the policy is moved to the procedure, ensuring that the policy remains overarching and operational items are reflected in the procedure. A new Corporate Complaints Handling procedure is provided in Attachment 2 for information purposes only, as much of the content from the previous policy has been transferred to the procedure. This Procedure is subject to approval of the Chief Administrative Officer, dependent on the Board's decision regarding approval of the revised Policy. Administration will also explore the development of a General Complaints procedure for handling complaints before they escalate to the Corporate Complaints process.

## STRATEGIC PLAN IMPACT

Revisions to the Complaints Policy related to the Strategy – Strengthen responsive internal/external communication under the 2020-23 Strategic Plan.

## FINANCIAL IMPLICATIONS



There are no direct financial implications resulting from this Report.

## CONCLUSION

It is concluded that the revised Complaints Policy be approved by the Board as presented.

## REFERENCE MATERIALS

- Attachment #1      [POL BRD 01:119 – Complaints \(draft revisions\)](#)
- Attachment #2      [PRO BRD-01:119-01 – Corporate Complaints Handling \(draft revisions\)](#)
- Attachment #3:      [POL BRD 01:119 – Complaints \(clean\)](#)
- Attachment #4:      [POL BRD 01-119-01 – Corporate Complaints \(clean\)](#)

PREPARED BY:	Carole Lem, Communications and Engagement Officer Katherine Bruneau, Process Review Lead
SIGNATURE	
APPROVED BY	William (Bill) Bradica, Chief Administrative Officer
SIGNATURE	
SUBMITTED BY:	William (Bill) Bradica, Chief Administrative Officer

<b>POLICY</b>	CATEGORY/SECTION <b>BOARD - GENERAL</b>
	SUBJECT <b>CORPORATE COMPLAINTS</b>

**AUTHORITY**

Governance and Procedural By-law 03-2021

**INTENT OF POLICY**

- To define types of complaints and set out a framework for management and resolution that preserves organizational relationships, where possible
- To establish a framework for receiving and handling complaints in a clear, consistent and effective manner
- To ensure TBDSSAB Board and staff members are aware of what to do if a complaint is received
- To ensure all complaints are handled fairly and in a timely manner.
- To ensure complaints are, wherever possible, resolved and that relationships are maintained

**DEFINITIONS**

A **Complaint** is an expression of dissatisfaction by an identified individual (self or representative, with appropriate consent) related to a TBDSSAB program, service, or staff member, where a person believes that TBDSSAB or its staff has not provided a service experience to the individual's satisfaction at the point of service delivery and a response or resolution is expected.

Types of complaints include but are not limited to:

- General Complaint – This feedback includes an issue that may be resolved by front line staff. It may include but is not limited to service provision, a change in entitlement, condition, or **goings on in activities in housing properties.**
- Corporate Complaint – A complaint that is not resolvable by a front-line staff person that has been escalated or was originally directed to a Manager, Director, CAO and/or Board Member.

A complaint is distinct from:

- Request for a service: A general or specific request for **program offering service or request for information regarding TBDSSAB** made by an individual that **can be resolved** is resolved at the point of service delivery (i.e.e.g., **Tenant calling Housing Maintenance or emailing Contact Us to report a problem**). Although a complaint could be made if TBDSSAB fails to deal with these effectively.

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- Feedback: An opinion or, comment shared regarding TBDSSAB and expression of interest in a TBDSSAB program of service by an individual.
- Compliment: An expression of approval for a ~~TBDSSAB~~ service, staff member, program, product or process.
- Suggestion: An idea submitted to TBDSSAB by an individual with the aim of improving services, programs, products or processes.
- Request for Internal Review – these are administered by various programs in compliance with their governing legislation.
- Fraud Allegation.
- ~~Ontario Works (OW) Review Process: OW clients have the opportunity to request an Internal Review and a further review by the Social Assistance Benefit Tribunal under the OW regulations~~
- Complaints by employees – these should be handled within their respective policy and/or procedure.
- Litigation – this is handled outside the complaints policy and procedure.
- Freedom of Information (FOI) or File Requests – this is handled outside the complaints policy and procedure.
- Ombudsman Inquiry – any inquiry and/or investigation by the ombudsman requires notification and potential work from various departments.

~~Some complaints are exempt, including:~~

- ~~Anonymous complaints: Anonymous complaints are difficult, if not impossible, to assess or investigate and will not be dealt with through the complaint handling process~~
- ~~Complaints by employees: Alternative procedures are available to employees to initiate complaints within the organization~~
- ~~Complaints about services (i.e. Tenants cannot use the formal complaints procedure to complain about rent increases or rent levels)~~
- ~~Complaints involving any form of litigation~~

### **Formal Complaint Process**

~~In order for a complaint to enter the formal documentation, investigation and resolution process, it must meet one of the following criteria:~~

- ~~The complaint could not be resolved at the front-line staff level~~
- ~~The complaint was initially addressed or directed to a Management level or above~~

### **POLICY**

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CATEGORY/SECTION

**BOARD – GENERAL**

SUBJECT

**CORPORATE COMPLAINTS**

~~To enable the timely consideration of a complaint, specific details of the incident, conduct, or behaviour giving rise to the complaint should be provided.~~

~~Complaints can be made:~~

- ~~• In person~~
- ~~• Over the phone~~
- ~~• Online (Via Contact Us email address on website)~~
- ~~• In writing (Via letter or email)~~

~~TBDSSAB encourages complaints, where possible, to be submitted in writing (online, email or letter).~~

~~All complaints will be dealt with promptly, fairly and sensitively. The complaint resolution process is a part of a quality culture where complaints are an opportunity for improvement.~~

**Complaint Service Response Standards:**

- ~~• We maintain a positive attitude and respond respectfullyPositive attitude toward dealing with feedback, compliments and complaints and respect for the complainant~~
- ~~• Reinforce the commitment of TBDSSAB to quality service delivery and encouragement for provision of feedback on what is and what can be improvedWe invite feedback and/or suggestions for improvement~~
- ~~•~~

~~The initial complaint will be acknowledged as received within 2 business days. If the complaint does not provide enough information for assessment and investigation, the complainant may be contacted for more details.~~

~~If enough details are provided, a complaint will be assessed, investigated and a response will be provided in writing within 14 days. More complicated complaints may require more time to investigate. TBDSSAB will communicate its expectations where a longer period is required.~~

**Complaints on Social Media**

~~As social media influences others, it is important TBDSSAB treats a complaint on Twitter, Instagram and Facebook as seriously as a face-to-face complaint. The target time to acknowledge a social media complaint is 24-48 hours. Complaints on social media are distinct from an opinion or comment and must include an identifying name.~~

**STANDARDS OF APPLICATION**

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**Roles and Responsibilities**

**General Complaints:** Any staff person may receive a complaint. If within their scope of work, they may also resolve the complaint (without any required reporting). Escalation follows the organizational structure of TBDSSAB.

**Corporate Complaints** are managed and documented by Communications and may require participation from other departments. See BRD 01 119 01 Corporate Complaints Handling.

Staff may receive and resolve complaints. Staff should be aware of escalation criteria and pathway(s). Staff are responsible for informing the Communications and Engagement Officer if they receive inquiry from the Ombudsman.

~~**Corporate Complaints:** a Corporate Complaint. The Supervisor, Communications & Engagement is responsible for receiving, and directing formal complaints to the appropriate Division; monitoring the status of complaints; and ensuring a response in accordance with the service standards.~~

~~Managers and Directors are responsible for documenting, investigating and ensuring a response to complaints about services which fall within their Division. Complaints about staff are to be processed by that staff member's immediate supervisor unless otherwise requested.~~

~~**Ombudsman Complaints:** Staff are responsible for informing the Communications and Engagement Officer if they receive inquiry from the Ombudsman.~~

~~Staff may receive and resolve complaints. Staff should be aware of escalation criteria and pathway(s). Staff are responsible for informing the Communications and Engagement Officer if they receive inquiry from the Ombudsman.~~

~~is required to have knowledge and understanding of: the purpose of receiving complaints, the process through which a complaint can be made and the service standards that apply to complaints.~~

**RELATED POLICIES**

[POL BRD-01:103 – TBDSSAB Board Members, Non-Members of Board Committees and Advisory Tables Code of Conduct](#)

**RELATED PROCEDURES**

[PRO BRD-01:119-01-XXX Corporate Complaints Handling](#) Procedure

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## The District of Thunder Bay Social Services Administration Board

<b>PROCEDURE</b>	<b>PROCEDURE NAME</b>	<del>Complaints received by TBDSSAB Board of Directors</del> <u>Corporate Complaints Handling</u>
	<b>PROCEDURE NUMBER</b>	BRD-01:119-01
	<b>PROCEDURE SECTION</b>	Board
	<b>POLICY REFERENCE</b>	<del>Corporate</del> Complaints BRD-01:119
	<b>REVISION DATE</b>	<u>December 12, 2023</u>
	<b>SUPERSEDES</b>	
	<b>IMPLEMENTATION DATE</b>	September 18, 2020

### **PROCEDURE STATEMENT:**

To provide a process for the management of corporate complaints that includes response, investigation, resolution, ongoing tracking and reporting.  
~~To ensure a clear process exists by which members of the TBDSSAB Board of Directors may direct concerns or complaints received from members of the public to TBDSSAB Administration for investigation, and to be assured of a timely and appropriate response.~~

### **DEFINITION:**

Refer to Corporate Complaints Policy BRD-01:119

### **PROCEDURE:**

- ~~1.0 — Complaints regarding TBDSSAB operations or staff, received by Board members, will follow the TBDSSAB Corporate Complaint Policy.~~
- 1.0 Staff and/or Board who receive contact from the Ombudsman and/or MPP that are not service inquiries enter the contact in to the webform at www.placeholder.com. These are tracked by the CE.
- 2.0 Whenever a Corporate Complaint is ~~Board member(s) receives~~ an official or informal complaint from a member of the public, the complaint is referred to the Communications & Engagement Officer (CE) by entering it in to the webform found at https://www.tbdssab.ca/feedbackform/index.php. 'Corporate Complaint' is included in the summary information section.
- ~~2.1 — The Board member shall include a copy of complaint (e.g. email, letter, social media comment) or a brief description of the complaint if received verbally.~~
- ~~2.2 — The Board member ensures that contact information for the complainant is provided in order to ensure a prompt response. Anonymous complaints cannot be acted upon.~~
- 2.13 The identity confidentiality of the complainant and the nature of the complaint will be protected during the transfer of information ~~from the~~

~~Board member to the Communications & Engagement Officer CE. (i.e. no cc'ing unnecessary contacts in the process of resolving the complaint).~~

2.24 ~~The Communications & Engagement Officer~~ If not already complete by virtue of the escalation internally, CE acknowledges receipt of the complaint to the complainant Board member and advises the Chief Administrative Officer (CAO) of the complaint.

2.35 If internal escalation has not occurred and it is possible the complaint may be resolved by front line staff, The the CE Communications & Engagement Officer directs the complainant to the appropriate Division

~~for assessment, investigation and resolution.~~

3.0 Where possible, The the Communications & Engagement Officer CE will acknowledge the receipt of the corporate complaint to the complainant within five (5) 2 business days.

3.1 The CE will work with the program Manager/Director to determine the appropriate written response, and response and provide a written resolution (either by traditional mail or email) within 3044 business days of the investigation start date, where possible. More complicated complaints may require more time to investigate. TBDSSAB will communicate if a longer period is required.

4.0 Complaints received via social media are entered in to the webform by the CE or designate. If these are already escalated to corporate complaint status, the CE notifies the complainant and facilitates investigation.

5.0 Corporate complaints will be monitored via an approved tool that allows for regular reporting to the CAO and other stakeholders.

~~4.0—More complicated complaints may require more time to investigate. TBDSSAB will communicate if a longer period is required. Something about tracking and reporting?~~

## **AUTHORITY AND RESPONSIBILITY:**

### **Board of Directors**

Board members are responsible for forwarding complaints in accordance with the established process and will not comment on the complaint or advocate on behalf of a complainant.

### **Chief Administrative Officer (CAO)**

The CAO will ensure TBDSSAB has a process in place for the investigation, tracking and reporting of complaints.

### **Division Directors and Managers**

Responsible for forwarding complaints in accordance with the established process and working with CE and CAO toward a response/resolution.

### **Communications & Engagement Officer (CE)**

The Communications & Engagement Officer is responsible for the operational application of the corporate complaints policy.



**Board of Directors**

~~Board members are responsible for forwarding complaints in accordance with the established process and will not comment on the complaint or advocate on behalf of a complainant.~~

<b>POLICY</b>	CATEGORY/SECTION <b>BOARD - GENERAL</b>
	SUBJECT <b>COMPLAINTS</b>

**AUTHORITY**

Governance and Procedural By-law 03-2021

**POLICY**

- To define types of complaints and set out a framework for management and resolution that preserves organizational relationships, where possible

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- Feedback: An opinion or comment shared regarding TBDSSAB.
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- Ombudsman Inquiry – any inquiry and/or investigation by the ombudsman requires notification and potential work from various departments.

**Response Standards:**

- We maintain a positive attitude and respond respectfully
- We invite feedback and/or suggestions for improvement

**STANDARDS OF APPLICATION**

**Roles and Responsibilities**

**Complaints:** Any staff person may receive a complaint. If within their scope of work, they may also resolve the complaint (without any required reporting). Escalation follows the organizational structure of TBDSSAB.

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**RELATED POLICIES**

POL BRD-01:103 – TBDSSAB Board Members, Non-Members of Board Committees and Advisory Tables Code of Conduct

**RELATED PROCEDURES**

PRO BRD-01:119-01 Corporate Complaints Handling



## The District of Thunder Bay Social Services Administration Board

<b>PROCEDURE</b>	<b>PROCEDURE NAME</b>	Corporate Complaints Handling
	<b>PROCEDURE NUMBER</b>	BRD-01:119-01
	<b>PROCEDURE SECTION</b>	Board
	<b>POLICY REFERENCE</b>	Complaints BRD-01:119
	<b>REVISION DATE</b>	December 12, 2023
	<b>SUPERSEDES</b>	
	<b>IMPLEMENTATION DATE</b>	September 18, 2020

### **PROCEDURE STATEMENT:**

To provide a process for the management of corporate complaints that includes response, investigation, resolution, ongoing tracking and reporting.

### **DEFINITION:**

Refer to Complaints Policy BRD-01:119

### **PROCEDURE:**

- 1.0 Staff and/or Board who receive contact from the Ombudsman and/or MPP that are not service inquiries enter the contact in to the webform at <https://www.tbdssab.ca/feedbackform/index.php>. These are tracked by the CE.
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  - 2.1 The identity of the complainant and the nature of the complaint will be protected during the transfer of information to the CE.
  - 2.2 If not already complete by virtue of the escalation internally, CE acknowledges receipt of the complaint to the complainant and advises the Chief Administrative Officer (CAO) of the complaint.
  - 2.3 If internal escalation has not occurred and it is possible the complaint may be resolved by front line staff, the CE directs the complainant to the appropriate Division

- 3.0 Where possible, the CE will acknowledge the receipt of the complaint to the complainant within five (5) business days.
- 3.1 The CE will work with the program Manager/Director to determine the appropriate written response, and response (either by traditional mail or email) within 30 business days of the investigation start date, where possible. More complicated complaints may require more time to investigate. TBDSSAB will communicate if a longer period is required.
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#### **Chief Administrative Officer (CAO)**

The CAO will ensure TBDSSAB has a process in place for the investigation, tracking and reporting of complaints.

#### **Division Directors and Managers**

Responsible for forwarding complaints in accordance with the established process and working with CE and CAO toward a response/resolution.

#### **Communications & Engagement Officer (CE)**

The Communications & Engagement Officer is responsible for the operational application of the complaints policy.