

Council Policy No.:	CP2026-022
Council Policy Name:	Corporate Complaints Handling Policy
Date Approved by Council:	March 24, 2026 CW2026-039/CR2026-082
Date revision approved by Council:	
Related SOP, Management Directive, Council Policy, Forms	Employee Code of Conduct and Ethics Code of Conduct and Ethics – Members of Council and Local Boards Accessibility Council Policy Whistleblower Council Policy Customer Experience Commitment Council Policy Customer Experience Strategy MD2017-021 Corporate Customer Service Standards Management Directive MD2018-002: Social Media Management Directive MD2024-003: Customer Conduct Management Directive

Policy Statement and Rationale:

The City of Kawartha Lakes is committed to transparent, fair, and accountable municipal service delivery. A clear and consistent approach to complaint handling supports public trust, service improvement, and accountability by ensuring that formal complaints are addressed in a structured, consistent, and timely manner.

This Corporate Complaints Handling Council Policy is established in alignment with the Customer Experience Commitment Council Policy and supports the implementation of the Customer Experience Strategy (CES), which together establish the City’s corporate approach to customer experience, accountability, and service transparency.

This Policy complements the Corporate Customer Service Standards (CSS) by establishing a formal complaints process for the intake, review, escalation, and resolution of complaints once service delivery processes have been completed, or where dissatisfaction relates to service outcomes, decisions, or conduct.

This Policy has been developed using best practices for municipal complaint handling, including guidance published by the Ontario Ombudsman for municipal complaint

resolution policies. These best practices emphasize clarity of process, fairness, transparency, accessibility, and timely resolution, and are reflected throughout this policy, as outlined in Appendix A.

This policy establishes:

- A formal complaints handling process
- Clear distinction between service requests, informal resolution, and formal complaints
- Defined escalation and review pathways, and process accountabilities
- Consistent expectations for timeliness, confidentiality, and fair treatment
- Corporate oversight and accountability for complaints handling practices
- Direction for identifying out-of-scope complaints and referring them to the appropriate policies, processes, or authorities

By implementing this Policy, the City strengthens consistency, transparency, and accountability in the handling of complaints and supports public trust in municipal service delivery through a clearly documented and consistently applied complaints handling process.

Scope:

This Policy applies to all City of Kawartha Lakes employees, members of Council and local boards or committees, volunteers, contractors, and agents acting on behalf of the City. It also establishes expectations and requirements for those responsible for receiving, reviewing, responding to, or managing formal complaints from customers.

This Policy applies to formal complaints related to:

- City programs
- City facilities
- City services
- City procedures
- City policies
- Employee conduct

This Policy applies only after applicable service delivery and service request processes have been followed and completed in accordance with the CSS.

This Policy does not apply to:

- Requests for service, unresolved service requests, or inquiries
- General feedback, suggestions, or compliments
- Anonymous complaints
- Claims for monetary compensation or damages, including matters that may be referred to the City's insurer
- Complaints regarding the conduct of the Chief Administrative Officer (CAO)
- Complaints regarding the conduct of members of Council or local boards
- Matters subject to legislated or regulatory appeal processes
- External agencies, boards, or corporations

Complaints regarding the conduct of members of council or local boards are addressed through the Code of Conduct and Ethics – Members of Council and Local Boards, including any referral process to the Integrity Commissioner, where applicable.

Complaints that are determined to be frivolous, vexatious, or associated with unacceptable customer conduct may be addressed in accordance with MD2024-003 Customer Conduct Management Directive.

It is recognized that additional notification, reporting, or procedural requirements may apply to certain complaints based on other Council policies, Management Directives, Standard Operating Procedures, or legislated requirements. Where such requirements exist, those prescribed processes will continue to be followed, even where they are not explicitly outlined in this policy.

Definitions:

For the purposes of this policy:

- **Accessibility** refers to the provision of services, information, and processes in a manner consistent with the Accessibility Policy and applicable accessibility legislation.
- **Acknowledgement** refers to confirmation that a complaint has been received by the City, including confirmation of next steps and applicable timelines.
- **Appeal** refers to a request for further administrative review of the outcome of a complaint, in accordance with the appeal process outlined in this policy.
- **City Facilities** refers to buildings, structures, and physical spaces owned, leased, or operated by the City and made available for public use or service delivery.
- **City Policies** refers to Council-approved policies that establish governance direction, principles, and requirements for the City of Kawartha Lakes.
- **City Procedures** refers to approved administrative or operational processes that guide how City services, programs, or policies are implemented.

- **City Programs** refers to organized activities, initiatives, or offerings delivered or administered by the City to meet community needs or Council-approved objectives.
- **City Services** refers to services delivered or administered by the City to residents, businesses, visitors, or stakeholders, including both direct and delegated service delivery.
- **Complaint** refers to a formal expression of dissatisfaction submitted by an identifiable individual regarding a City service, program, facility, procedure, policy, decision, service outcome, or employee conduct, that is accepted and managed in accordance with this policy.
- **Complainant** refers to an identifiable individual who submits a complaint under this policy.
- **Compliments** refer to expressions of praise or positive feedback regarding City services, programs, facilities, employees, or interactions, and do not require review under the complaints handling process.
- **Customer** refers to any resident, business, visitor, or stakeholder who interacts with the City of Kawartha Lakes.
- **Customer Experience** refers to the overall perception formed through all interactions a customer has with the City, across any service channel.
- **Customer Experience Strategy** refers to the administrative strategy developed and maintained under the Customer Experience Commitment Council Policy that guides how the City delivers on Council's customer experience commitment.
- **Employee Conduct Complaint** refers to a complaint where dissatisfaction relates to the behaviour, actions, or conduct of a City employee in the course of their duties.
- **Escalation** refers to the formal progression of a service request or complaint for additional review when established timelines are not met or further oversight is required.
- **Feedback** refers to input, comments, or observations provided by a customer regarding City services, programs, facilities, or processes that do not constitute a complaint and do not require a formal review under this policy.
- **Informal Resolution** refers to the resolution of a concern through routine service delivery, discussion, clarification, or corrective action, without initiating the complaints handling process under this policy.
- **Inquiry** refers to a request for information or clarification that does not require service action and is addressed through standard service delivery channels.
- **Service Channel** refers to the means by which customers interact with the City, including in-person, by telephone, email, digital platforms, and other approved communication methods, subject to any limitations set out in this policy.
- **Service Request** refers to a customer-reported issue requiring action by the City that cannot be resolved at the first point of contact and is tracked and managed in accordance with the Corporate Customer Service Standards.

- **Service-Related Complaint** refers to a complaint where dissatisfaction relates to a completed City service, service outcome, program, facility, procedure, policy, or decision.
- **Suggestions** refer to ideas or recommendations provided by a customer to improve City services, programs, facilities, or processes, and do not require review under the complaints handling process.
- **Unacceptable Customer Conduct** refers to behaviour or actions by a customer that are inconsistent with the principles of respectful conduct set out in the Customer Conduct Management Directive, including conduct that is abusive, threatening, discriminatory, frivolous, vexatious, or unreasonably persistent.

Policy

Formal Nature of the Complaints Process

The complaints handling process established under this Policy is a formal administrative process. It is distinct from routine service delivery, informal resolution, and general feedback, and is governed by defined timelines, escalation pathways, and review requirements.

Complaints are distinct from inquiries, feedback, suggestions, and compliments, which are addressed through standard service delivery and customer service channels.

Purpose of the Complaints Handling Process

The purpose of the complaints handling process is to provide customers with a fair, transparent, and consistent mechanism to raise concerns regarding City services, programs, facilities, procedures, policies, or employee conduct.

Through this process, the City seeks to review concerns objectively, explain decisions or outcomes, identify opportunities for service improvement where appropriate, and ensure accountability in municipal service delivery.

Complainants will receive a written response outlining the outcome of the review and any available next steps under this policy.

Accountability and Escalation

Responsibility for managing and resolving complaints under this Policy is assigned to City staff at appropriate levels based on the nature of the complaint.

Employees, Managers, Directors, and the CAO each have defined responsibilities within the complaints handling process. Under this Policy, staff are authorized to address complaints within the scope of their role and responsibilities. Complaints are escalated where resolution cannot be achieved or where the nature of the complaint requires additional oversight.

Relationship to Service Requests

Formal complaints are not a substitute for service requests.

Service-related concerns must first be addressed through the service request process established under the CSS, including applicable Division Service Targets and escalation pathways.

Formal complaints will not generally be accepted while a related service request remains open or is actively progressing through the escalation pathway outlined in the CSS.

Where a service request has been addressed and subsequently reoccurs, a new service request will generally be initiated prior to consideration as a formal complaint, unless the concern relates to how the service was handled or communicated.

Informal Resolution

Where reasonably possible, employees are encouraged to resolve concerns informally at the point of contact or through routine service delivery within their assigned responsibilities and within the prescribed policies, management directives, and processes.

Informal resolution is encouraged where appropriate but is not required as a condition of submitting a formal complaint under this Policy.

Complaint Intake and Classification

Formal complaints may be received in writing through corporate service channels as defined in the CSS, including email, web submission, in-person, or written correspondence. Telephone contact may be used to provide guidance and support with the complaints process, including assistance with completing a written submission, but formal complaints will not be accepted by telephone.

The City will provide reasonable assistance and accommodations, in accordance with CP2021-030 Accessibility Policy and the Ontario Human Rights Code, to individuals who require support in submitting a formal complaint, including assistance related to accessibility needs, communication barriers, or other circumstances that may affect their ability to access the complaints process.

Complaints are reviewed in a fair, consistent, and objective manner, with consideration given to the information available and the applicable policies and standards. Complaint reviews consider all relevant information available at the time of review. Staff are expected to cooperate with complaint resolution efforts, and complainants may be invited to provide additional information where appropriate prior to a final decision.

To be accepted as a formal complaint under this Policy, a submission must:

- Be made by an identifiable individual
- Be submitted in writing
- Relate to a City service, program, facility, procedure, policy, or interaction that has occurred
- Clearly express dissatisfaction and a request for review or resolution beyond standard service delivery
- Include sufficient supporting information to allow the complaint to be reviewed, such as relevant dates, times, locations, photographs, correspondence, or other documentation
- Identify the requested or recommended resolution
- Where the complaint relates to employee conduct, include details of the alleged misconduct sufficient to support review under Code of Conduct and Ethics – Employees

Complaints are classified as:

- Service-related complaints, where dissatisfaction relates to a completed service, program, facility, procedure, policy, or service outcome
- Employee conduct complaints, where dissatisfaction relates to the behaviour or actions of an employee

The classification of the complaint will dictate the prescribed process for reviewing and as needed escalating the complaint as noted below.

Where a submission is more appropriately addressed as a service request or financial claim, the individual will be advised of the appropriate process.

Complaint Acknowledgement, Review, and Escalation

Acknowledgement

All formal complaints will be acknowledged by the City within three business days of receipt. Acknowledgement will confirm receipt, contact information for the staff responsible for managing the complaint, and next steps in the review process.

Service-Related Complaints

Step 1: Division Head (Manager) – Initial Division Review

Following acknowledgement, service-related complaints are referred to the Division Head responsible for oversight of the service, program, facility, procedure, or policy.

Division Heads have two weeks to review and respond to the complaint, including:

- confirming the relevant facts and context, including whether the complaint meets the criteria of a formal complaint under this Policy or should be addressed through another appropriate process
- determining whether the complaint can be resolved by the Division Head
- communicating the outcome of the review and any actions to be taken to the complainant

Where additional time is required to complete a review, the complainant will be informed of the reason for the delay and provided with an updated timeframe for response.

Where a service-related complaint is resolved by the Division Head, the complaints handling process concludes for service-related complaints, subject to the appeal provisions of this Policy.

Where a complaint is not resolved within the review and response timeframe, and a revised response timeline has not been communicated by the Division Head, or where the nature of the complaint warrants additional oversight, the complaint will be escalated to the Department Head for review.

Step 2: Department Head (Director) – Final Division Review

Department Head review occurs where:

- a complaint is escalated following the Division Head review
- a complaint is not resolved within the timeframe established for the Division Head review

The Department Head responsible for oversight of the service, program, facility, procedure, or policy will review the complaint, including consideration of the information available to date, any actions taken by the Manager, and any additional information provided by the complainant.

Department Heads have two weeks to complete their review and either provide a response or clearly outline the outcome of the review and any actions to be taken.

Where additional time is required to complete a review, the complainant will be informed of the reason for the delay and provided with an updated timeframe.

Completion of Department Head Review represents the conclusion of the complaints handling process for service-related complaints under this Policy. At this stage, the complainant will be advised of the outcome of the review and informed of the option to request an appeal in accordance with the Appeal Process outlined in this policy.

Possible Outcomes of a Complaint

The outcome of a complaint may vary depending on the nature of the concern and the information reviewed. Outcomes may include, but are not limited to:

- confirmation that service was delivered in accordance with applicable legislation, Council policies, standards, or approved procedures
- clarification or explanation of a decision, process, or outcome
- identification of service improvements or corrective actions, where appropriate
- determination that no further action is required

Appeal Process

Following completion of the Department Head review for a service-related complaint, a complainant may request an appeal to the CAO for final administrative review.

Director Review is required prior to any appeal to the CAO. Where a service-related complaint was resolved by the Division Head, and an appeal is requested, the complaint will first be referred for Department Head review before it may be considered by the CAO.

Requests for appeal must be submitted in writing within two weeks of receiving the Department Head's response.

The CAO represents the final level of internal review for service-related complaints under this Policy.

Employee conduct complaints are not subject to appeal under this Policy.

Employee Conduct Complaints

Complaints related to employee conduct are directed immediately to the Department Head responsible for the applicable Department.

Employee conduct complaints are managed in accordance with Code of Conduct and Ethics – Employees, applicable legislation, and labour relations practices.

Due to confidentiality and privacy obligations, complainants may receive limited information regarding the internal handling or outcome of employee-related complaints.

Completion of the review by the Department Head represents the conclusion of the complaints handling process for employee conduct complaints under this Policy. The Appeal Process does not apply to employee conduct complaints. Any remediation or corrective actions arising from the review will be documented and reported internally by the Department Head, in consultation with People Services, as appropriate.

Complaints regarding the conduct of the CAO are not addressed through this complaints process and are directed to the Mayor for review and response.

Confidentiality, Privacy, and Fair Treatment

All complaints will be handled respectfully, impartially, and without reprisal, and in accordance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and other applicable legislation governing privacy and confidentiality.

The identity of the complainant will be disclosed only to those who need to know in order to review and respond to the complaint.

All participants in the complaints handling process are expected to maintain confidentiality, except where disclosure is required by law.

Due to privacy, confidentiality, and employment-related obligations, the information shared with a complainant may be limited, particularly in matters involving employee conduct. While the City will confirm that a complaint has been reviewed and addressed, detailed information regarding internal discussions, findings, or actions may not be disclosed.

External Oversight

Following completion of the City's complaints process, a complainant may seek external review through the Ontario Ombudsman in accordance with the Ontario Ombudsman Act. Information about contacting the Ontario Ombudsman is available at www.ombudsman.on.ca or by calling 1-800-263-1830.

Governance, Oversight, and Continuous Improvement

Complaints addressed under this Policy relate to City services, programs, facilities, procedures, policies, and employee conduct. While Council establishes service levels through budgets and policies, the handling of individual complaints is an administrative function carried out under this Policy.

Council is not involved in the intake, review, escalation, or resolution of individual complaints. Complaints may relate to the administrative implementation or communication of decisions of Council, where applicable. Matters that are subject to statutory appeal or reconsideration processes continue to be addressed through separate Council-approved or legislated processes and are not part of this complaints process.

Formal complaints are recorded and monitored to support consistency, accountability, and continuous improvement in service delivery. Aggregate complaint information may be used to identify trends and opportunities to improve City services and processes.

The CAO is responsible for corporate oversight of the complaints handling process, including monitoring and enforcing compliance. The Customer Experience Division is responsible for identifying trends and supporting continuous improvement. Feedback on the complaints handling process may be provided to the Customer Experience Division to support future revisions of this Policy.

Operational procedures, tools, and record-keeping practices supporting this Policy are maintained separately through approved Standard Operating Procedures and Customer Experience Toolkits. Complaints and related interactions are recorded in accordance with approved corporate record-keeping practices.

A high-level overview of the complaints handling process is provided in Appendix B.

Review:

This policy will be reviewed once per term of Council in accordance with the Policy System Council Policy.

Revision History:

Proposed Date of Review:

Revision	Date	Description of changes	Requested By
0.0	November 22, 2016	Initial release	
1.0	January 20, 2021	Updated policy template	
2.0	April 20, 2021	Updated policy number	Council
3.0	March ##, 2026	Alignment with Corporate Customer Experience Program	Customer Experience Division

Appendix A – Ontario Ombudsman Best Practices for Municipal Complaint Resolution:

Appendix A provides the Ontario Ombudsman’s best practices for municipal complaint resolution, which informed the development of this Policy.



Tips for Municipal
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Appendix B – Corporate Complaints Handling Framework:

This appendix provides a high-level visual overview of the Corporate Complaints Handling process outlined in this Policy. In the event of any inconsistency, the Policy text prevails.

