



THE CORPORATION OF THE CITY OF
BRANTFORD
POLICY MANUAL

POLICY NUMBER: CORPORATE-053

SUBJECT: CUSTOMER CODE OF CONDUCT

POLICY STATEMENT:

(Purpose/Objective)

The City of Brantford is dedicated to providing an accessible, welcoming and comfortable environment that respects all customers, visitors and staff. In order to clearly communicate the expectations of members of the public when interacting or engaging with City staff/representatives, we have established this Customer Code of Conduct Policy to help ensure that environment is maintained and that it aligns with our values:

[City of Brantford Values](#)

Furthermore, this policy applies to unacceptable customer behaviour and unreasonably persistent customers. This policy is designed to identify behaviours that are unacceptable and which may result in the City imposing limitations and restrictions on a customer's interactions with City staff/representatives and access to services.

RELATED POLICY PROCEDURES/GUIDELINES:

Definitions:

“Staff/Representatives” means all of the City's employees, contractors, volunteers, students, Task Force or Committee members and all members of City Council.

“Customer” includes residents, visitors, businesses, not-for-profit organizations, stakeholders, community and corporate organizations that interact with City employees/representatives and/or are provided services from the City of Brantford.

GUIDELINES:

Expectations of our customers

All customers of the City are entitled to be treated in a fair and respectful manner. In turn customers are required to treat City staff/representatives and other customers in a courteous, respectful and civil manner. This Policy is consistent with and complements the following City Policies and Standards:

- [Employee Code of Conduct.](#)
- [Council Code of Conduct.](#)
- [City of Brantford Respectful Workplace Policy.](#)
- [Customer Complaints Handling Policy.](#)
- [Ontario Human Rights Code.](#)
- [Ontario Health and Safety Act.](#)

The City of Brantford requires civil and mutually respectful interactions in an effort to explore and understand our customer’s requests and inquiries with the objective of providing responses/resolutions in a timely manner.

Behavioural Expectations of Customers

Customers are expected to interact with City staff/representatives as follows:

- Posing questions/concerns to staff in a calm and respectful manner.
- Using courteous language in each interaction with staff.
- Clearly explaining the nature of a concern or inquiry.
- Accepting the City’s response and/or resolution of the matter if new materials/information is not provided to alter the City’s response.

The list of examples set out above is not exhaustive. It is meant to be instructive and should serve as a reference to types of behaviour which foster civil and mutually respectful interactions.

Examples of Unreasonable Behaviour

Consistent with the [Ontario Human Rights Code](#), the City strictly forbids discrimination or harassment of any kind, whether based on race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status or disability.

In addition to the above, harassment may include but is not limited to, unsolicited or unwelcome remarks, gestures or physical contact, as well as the display or circulation of inappropriate or derogatory written materials or pictures.

Unreasonable behaviours that will not be tolerated include, but are not limited to:

- Verbally or physically intimidating, harassing, or threatening others
- Utilizing hostile, loud, abusive, obscene, offensive, rude, explicit, or vulgar language.
- Repeatedly challenging or confronting staff.
- Touching, or inflicting unwanted physical contact upon another person.
- Malicious or harmful statements about others.
- Public disclosure of another's private information.
- Possession of dangerous or unauthorized material.
- Interacting with City staff/representatives while intoxicated or while in possession of drugs or alcohol.
- Solicitation, purchase or selling of illegal substances.
- Engaging in any behaviour that is designed to intimidate City staff/representatives.
- Damage to any City property or assets.
- Harassing the Corporation. This could include a high volume/frequency of correspondence or constant accusations accompanying frequent complaints that have already been dealt with.
- Disobeying or disregarding lawful instructions from City staff/representatives.
- Making derogatory or insulting statements regarding staff.
- Frequently or repeatedly questioning the morality, decency or ethics of City staff/representatives.
- Sharing with others, or circulating derogatory or insulting statements regarding City staff/representatives.
- Demanding services that are of a nature or scale that cannot be provided by the City.
- Persistently contacting the City about the same matter when it has been considered and dealt with.
- Repeatedly sending phone calls, voicemail messages, visits, letters, emails after being asked not to do so.
- Repeatedly contacting different staff seeking a different outcome or

response.

- Any behaviour that poses a health or safety risk to staff.

City staff/representatives, who feel an immediate threat to their person or property should call 911 in the event of an emergency.

Immediate Consequences of Violation

The decision to classify someone's behaviour as unreasonable, could have serious consequences for the offending customer, including restricting their access to municipal services. The decision to classify a customer's behaviour as unreasonable may be made by any City staff/representative that is engaged with a customer or by the staff/representatives' immediate supervisor. If such a determination is made City staff/representatives will be permitted to immediately terminate any interaction with a customer and the customer may be temporarily removed from City facilities or the City staff/representative can end communication with the customer. Where any City staff/representatives determine that a customer has engaged in unreasonable behaviour they will be required to inform their manager/supervisor, who in turn will be required to advise the Director or General Manager responsible for the City staff/representative that was subjected to the unreasonable behaviour.

Of paramount importance to the City is the health, safety and security of its staff/representatives and customers. This policy is strictly enforced and non-compliance will result in corrective measures being taken.

Additional Consequences of Violation

In addition to the immediate consequences identified above, customers may be subject to additional restrictions which are designed to correct a customer's unreasonable behaviour, protect City staff/representatives and foster an environment of civility and mutual respect.

Restrictions will be adapted to deal with the individual circumstances and may include one or more of the following:

- Placing limits on the number and duration of contacts with staff per week or month.
- Offering a restricted time slot for necessary calls.
- Limiting the customer to one method of contact (telephone, letter, email, etc.)
- Requiring the customer to communicate only with one named member of staff.
- Requiring any personal contacts to take place in the presence of a witness and in a suitable location.
- Requiring the customer to make contact by telephone only through a third party e.g. solicitor/counsellor/friend acting on their behalf.

- Limiting or regulating the customer's use of municipal services i.e. Access to programming and/or technology systems.
- Cancelling a customer's membership or temporarily suspending membership.
- Refusing the customer access to any City building except by appointment.
- Informing the customer that further contact on the matter of the complaint/request will not be acknowledged or replied to.
- Pursuing Legal actions i.e. issuance of Notice of Trespass.
- Where efforts to resolve matters with the customer have not been successful the case or request may be closed without further action.
- Other actions as deemed appropriate.

Suspension

In the event a customer contravenes this policy and engages in unreasonable behaviours the customer may be suspended from a City facility or program for a defined period of time, before being readmitted following a declaration of willingness to comply with this policy. If a suspension includes a no trespass order, said order will be issued pursuant to [HSS-061-Workplace Security](#).

Termination

An offending customer may be removed from a City program or facility if their unreasonable behaviour results in extreme disruption, or harm to self, others, or property.

Each case will be considered on an individual basis.

Identifying a Policy Violation

Prior to imposing any of the consequences identified under the headings "Additional Consequences of Violation", "Suspension" or "Termination" there must be a determination by the applicable Director, General Manager or the City's Chief Administrative Officer (CAO) that a customer did in fact engage in unreasonable behaviour. In cases where the unreasonable behaviour is directed at a member of City Council or a member of a City Task Force or Committee, said determination will be made by the City's CAO.

Before deciding to apply any restrictions, the Director, General Manager or CAO that is responsible for determining if a customer has engaged in unreasonable behaviour should consider whether:

- The customer's concerns and/or requests have been dealt with properly and in-line with any relevant procedures and statutory guidelines
- City staff/representatives have made reasonable efforts to satisfy or

- resolve the request or respond to the inquiry
- The customer is not presenting new and relevant material or information about the situation or that the customer is advancing a new and good faith request in compliance with the City's standards of behaviour.

Notification Process Roles and Responsibilities

If any City staff/representative believes that a request/complaint or customer interaction is unreasonable, the individual should consult with their immediate manager or supervisor to provide any supporting materials and explain steps that have been taken to resolve the matter, including as appropriate:

- The length of time that staff have been in contact with the customer, history of the interactions and the amount of correspondence that has been exchanged with the customer
- The number of requests/complaints that the customer has brought forward and the status of each open case (if applicable)
- The nature of the customer's behaviour
- Impact on the employee/City representative

Managers/Supervisors

Managers/Supervisors who have been notified by City staff/representatives are responsible for briefing the Director or General Manager responsible for the staff/representative regarding details of the situation.

General Manager/CAO

The relevant Commission General Manager or the CAO in the case of departments that report directly to the CAO, is responsible for reviewing the information provided by City staff/representatives in a timely manner and confirming whether or not this Policy should be applied. Specifically, the GM/CAO will:

- Review the information provided by staff and determine if the customer's behaviour warrants the application of restrictions/consequences of violating this policy.
- Work with the staff/representative to determine appropriate restrictions, how to inform the customer of the restrictions and determine a review date for removing, modifying or continuing restrictions.
- Consult with Health and Safety staff prior to making a decision.
- Provide a recommendation to the CAO, where appropriate, including proposed restrictions, how to inform the customer of the restrictions and determine a review date for removing, modifying or continuing restrictions.
- Ensuring that relevant staff are aware of this Policy and any

accompanying guidelines and protocols.

If the CAO's input is required to determine that a customer's behaviour is unreasonable, the CAO should be satisfied that:

- The request has been properly investigated;
- Communication with the customer has been adequate; and
- The customer is not attempting to make a new and good faith request in compliance with the City's standards of behaviour.

If a Director, General Manager or the CAO determines that a customer has engaged in unacceptable behaviour and any of the consequences identified under the headings "Additional Consequences of Violation", "Suspension" or "Termination" have been imposed, the customer will receive written notification that:

- Details what decision/action has been taken and why.
- Explain what it means for the customer's contacts with the City.
- Advise how long the restrictions will last and when the decision will be reviewed.

Upon determination of an "unreasonable" interaction with City staff, the offending customer will be provided with a copy of this Customer Code of Conduct Policy and a verbal warning of the consequences of violating this Policy, in addition to any other consequences that may be imposed. Customers who appear to be under the influence of alcohol or drugs may be asked to leave the premises without additional warnings.

Appeal

Customers have the right to appeal a decision related to this Policy. Procedures for appealing an outcome can be found in the City's Complaint Policy:

[Customer Complaint Policy](#)

In the event requests/complaints cannot be resolved through the City's Complaint Process and/or this Policy, the complainant may choose to submit to the Provincial Ombudsman's office in accordance with the provisions of Bill 8.

Policy Communications

Upon approval of this Policy, an education and awareness campaign will be implemented so the community is well aware of expectations and violation consequences.

Date of Enactment:	Related By-law Number/Staff Report Number: 2022-645 (Combined Committee of the Whole Report #2022-09-27)
Review and Amendment Dates:	Department Responsible for Review: Communications, Customer Engagement and Customer Service
Date of Next Review: 2024	Applicable Legislation/Legislative Authority: