

Corporate Policy

Subject: Frivolous, Vexatious or Unreasonable Requests or Complaints Policy

Council Approval Date: August 11, 2026

1. Purpose

The Town of Caledon recognizes the importance of public input and values Complaints as a source of Feedback. At the same time, Frivolous, Vexatious, or Unreasonable Complaints or Feedback can consume a disproportionate amount of time and resources, and impede Town Employees from addressing other essential issues. This Policy establishes a consistent process for Town Employees to follow when responding to such Complaints or Requests related to Town By-laws, programs, facilities, or services.

2. Definitions

Term	Definition
Complaint	An expression of dissatisfaction or concern about the action or lack of action regarding operations, facilities, services, or programs provided by the Town or a person or body acting on behalf of the Town. A Complaint can be spoken, written, or submitted by any other method of communication.
Complainant	A person submitting a Complaint. Any individual who uses or is affected by Town services, including residents, visitors, businesses, and community groups, may be a Complainant.
Council	The Town of Caledon Council as a whole.
Council Member	An individual member of Council, including the Mayor.
Cyberbullying	Intentional harmful behaviour carried out through digital platforms, including social media, messaging services, blogs, or websites, aimed at harassing, threatening, slandering or demeaning an individual.
Detrimental Effect	Any impact that negatively affects the ability of the Town, its Employees, or other members of the public to perform their roles or access services effectively, including exposure to Harassment, intimidation, or disruption of operations.
Employee	All full-time, part-time, temporary, seasonal, or contract employees of the Town of Caledon.
Feedback	An opinion or comment about a program, facility, or service.
Frivolous	Relating to Complaint or Request that has no serious purpose or value, may be trivial, or forms part of a pattern of conduct that amounts to an abuse of access, interferes with Town operations, or is made in bad faith or for purposes other than obtaining access.
Harassment	Conduct, in or outside the workplace, that is or should reasonably be known to be unwelcome. It includes actions or comments that offend, intimidate, or humiliate someone based on race, sex, age, disability, religion, sexual

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	orientation, or other grounds enumerated in the Human Rights Code. It can also include bullying, ridicule, or other demeaning conduct.
Request	The act of asking for something to be given or done.
Town	Means The Corporation of the Town of Caledon.
Unreasonable	Relating to a Complaint or Request likely to cause distress or disruption to the Town, its Employees, or other members of the public without proper or justified cause. Includes behaviour that, because of the nature or frequency of contact, negatively affects the ability to address Complaints.
Vexatious	Relating to a Complaint or Request without merit, pursued in a manner that is malicious, intended to inconvenience, embarrass, or harass, or forming a pattern of conduct amounting to a misuse of the Complaint process.

3. Scope

This Policy applies to all Town of Caledon Employees, volunteers, students, and contracted service providers. It governs the handling of Frivolous, Vexatious, or Unreasonable Complaints or Requests related to Town By-laws, policies, procedures, programs, facilities, and services, regardless of the avenue through which the Complaint is submitted.

This Policy does not apply to:

- Complaints about Members of Council, who are governed by the Council Code of Conduct for Members and Designated Boards, and subject to investigation by the Integrity Commissioner.
- Members of advisory committees, quasi-judicial committees, and local boards.
- Matters where a statutory or prescribed process for review exists, or where a specific piece of legislation governs the process.
- Complaints from Employees about other Employees or workplace conditions.
- Complaints from members of the public regarding Town Employees. Such complaints should be directed to People Services at peopleservices@caledon.ca.
- Allegations of violations under the *Criminal Code* of Canada.
- Situations where legal action against the Town or a Town official has been threatened or commenced.

4. Policy Statement

The Town of Caledon is committed to providing high-quality, timely, and responsive service to all members of the public. This Policy ensures that municipal resources are used effectively and efficiently while maintaining a work environment that is safe, respectful, and free from discrimination, Harassment, bullying, Cyberbullying, and violence. By following this Policy, Town Employees will handle Frivolous, Vexatious, or Unreasonable Complaints consistently, and in a manner that upholds the Town's values of trust, accountability, and customer service excellence.

5. Roles

Employees



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Employees are expected to understand the purpose of receiving Complaints or Requests, the process for submitting a Complaint, and the service standards that apply. They must be aware of this Policy and any associated guidelines or protocols.

People Leaders

People Leaders are responsible for ensuring that relevant Employees are aware of and trained on this Policy and any associated guidelines or protocols.

Commissioners

Commissioners are responsible for ensuring this Policy is applied consistently across the Town and adhered to by all Employees. They are also responsible for clarifying or resolving any ambiguity within the Policy.

Complainants

Complainants and members of the public are expected to recognize that the Town must balance the needs of the whole community. They should provide honest, respectful, and constructive communication to assist in improving services.

6. Identifying a Frivolous, Vexatious, or Unreasonable Complaint or Request

A Complaint or Request may be considered Frivolous, Vexatious, or Unreasonable when its nature or manner of pursuit has a Detrimental Effect on the Town or its Employees. This includes Complaints or Requests that are without merit, made in bad faith, intended to harass or intimidate, or submitted for purposes other than to resolve a legitimate issue. These types of Complaints or Requests may occur as isolated incidents or as repeated actions over time, creating a pattern that disrupts service delivery, consumes disproportionate Town resources, or causes undue stress to Employees or others involved.

The following list provides examples of actions, behaviours, or patterns of conduct that may be considered Frivolous, Vexatious, or Unreasonable. This list is not exhaustive and is intended to guide Employees:

Complaints Already Addressed

- Raising issues that have already been investigated or resolved.
- Repeatedly attempting to reopen concluded matters or resubmit substantially similar Complaints without new information.
- Making repeated Requests for information already provided.

Unreasonable or Excessive Demands

- Seeking outcomes that are impossible, outside Town policy, or beyond the Town's capacity.
- Making excessive or repetitive contact (e.g., calls, emails, visits, or letters), especially with an expectation of an immediate response.
- Refusing to clarify the grounds of a Complaint despite offers of assistance.
- Submitting Requests intended to cause disruption, inconvenience, or annoyance, or that lack any serious purpose.

Harassment, Intimidation, or Abusive Behaviour

- Using hostile, offensive, or abusive language toward Town Employees or others involved.
- Making Complaints with the intent to embarrass, retaliate, or harass.
- Fixating unreasonably on an individual Employee, including unjustified Complaints or threats affecting their employment.
- Cyberbullying or repeated hostile engagement through social media or other platforms targeting the Town or its Employees.

Misuse of Processes and Resources

- Contacting multiple Employees in search of different outcomes or refusing to cooperate with the investigation process.
- Using the Complaint process as a tool in personal disputes.
- Submitting Complaints or Requests that place an unreasonable burden on Employee time and resources or disrupt the Town's ability to serve the community.

7. Complaint Procedure

The Town recognizes that classifying a Complaint or Request as Frivolous, Vexatious, or Unreasonable is a serious action. This classification will only be applied in circumstances where it is clearly warranted, and never in situations where a Complainant is acting reasonably or seeking legitimate resolution. All Town Employees must exercise caution and ensure all other avenues of communication, investigation, and resolution have been appropriately considered before taking any action under this Policy.

Classifying Complaints or Requests

To determine whether a Complaint or Request falls within the scope of this Policy, all relevant facts must be considered. Each Complaint will be assessed on a case-by-case basis, using the definitions, principles, and examples outlined in this Policy.

The following stages outline the process that may be followed where concerns arise regarding a potentially Frivolous, Vexatious, or Unreasonable Complaint or Request. Depending on the circumstances, the process may conclude at any stage without proceeding further.

Stage 1 – Initial Review By Employee

If an Employee believes that a Complaint or Request is Frivolous, Vexatious, or Unreasonable, they must consult with their People Leader and provide all relevant supporting materials (e.g., emails, letters, voicemails, notes of telephone conversations, or records of in-person discussions). The Employee should also summarize the steps that have been taken to address the issue, including:

- The length of time the Employee has been in contact with the Complainant and the volume of correspondence exchanged.
- The number of Complaints submitted by the Complainant and the status of each Complaint.
- The nature of the Complainant's behaviour.

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- A list of other departments or Employees the Complainant has contacted regarding the same issue or a similar issue.

Employees are encouraged to seek guidance from their People Leader even before a pattern of conduct has been formally established, particularly if the Complainant's behaviour raises concerns about Harassment, intimidation, or other unacceptable conduct.

Stage 2 – Employee Consultation and Review with People Leader

People Leaders are responsible for reviewing the information provided by Employees and determining whether further escalation is warranted.

Before escalating, the People Leader must ensure that:

- Ensure the Complaint has been handled according to Town procedures and any relevant laws.
- Employees have made reasonable efforts to resolve the Complaint, and communication with the Complainant has been adequate.
- The Complainant is not attempting to provide any significant new information when contacting Employees.

Where escalation is deemed appropriate, the People Leader will:

- Refer the matter to their respective Commissioner for awareness and initial review; and
- In consultation with that Commissioner, forward the matter to the Commissioner of Corporate Services and the Chief Legal Officer for further review and direction on whether this Policy should be applied.

Stage 3 – Commissioner Review

The Commissioner of the originating division is responsible for reviewing the information provided by the People Leader in a timely manner and ensuring the matter is appropriate for further consideration under this Policy.

After reviewing the Complaint, the originating division Commissioner forwards the matter to the Commissioner of Corporate Services and Chief Legal Officer, who have the final authority to determine application of this Policy. As part of this process, additional information may be requested, including consultation with Employees from other departments to verify the extent of the Complainant's contact with the Town.

The Commissioner of Corporate Services and Chief Legal Officer will determine whether the Complaint or Request falls within the scope of this Policy. Where it is determined that the Policy applies, the process will proceed to Stage 4 – Issuance of Written Warning.

Stage 4 – Issuance of Written Warning

If, after review, the Commissioner of Corporate Services and Chief Legal Officer determines that the Complaint or Request is Frivolous, Vexatious, or Unreasonable, a Written Warning will be issued to the Complainant.

The Written Warning will:



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- Describe the actions, communications, or patterns of conduct determined to be Frivolous, Vexatious, or Unreasonable;
- Clearly explain the consequences, including any restrictions or actions that may be implemented if such conduct continues;
- Provide the Complainant an opportunity to adjust their behaviour; and
- Be circulated internally to the Leadership Team and Town Clerk to ensure all appropriate parties are informed.

The Written Warning is to be formally issued by the Commissioner of Corporate Services and Chief Legal Officer, reflecting their authority to apply this Policy.

Stage 5 – Applying Restrictions After Written Warning

If a Complainant disregards a Written Warning and continues to act in a manner deemed Frivolous, Vexatious, or Unreasonable, the Commissioner of Corporate Services and Chief Legal Officer may implement one or more of the following restrictions to mitigate the impact on Employees and Town resources:

- Limiting the Complainant's correspondence with Employees to a particular format (e.g., email only), frequency, time, or duration.
- Restricting the Complainant to a single point of contact (with other Employees directed to refer them to that contact).
- Requiring any in-person meetings to occur with an appropriate witness and in a suitable location.
- Requiring the Complainant to communicate only through a third party (e.g., a lawyer or representative).
- Requiring the Complainant to provide full disclosure of relevant documentation or information before Town Employees will consider further Complaints.
- Instructing Employees not to respond to correspondence or investigate Complaints that are substantially similar to matters already addressed.
- Limiting or regulating the Complainant's access to Town services or facilities or issuing a Trespass Notice where appropriate.
- Reducing or ceasing further contact and responses from Employees in extreme circumstances, including blocking or filtering the Complainant's email address(es) from Town systems.
- Taking any other action deemed reasonable and proportionate to the circumstances.

Restrictions are serious measures and will only be applied when a Complainant's behaviour clearly and persistently has a Detrimental Effect on the Town, its Employees, or resources. This includes situations where Employees' ability to perform their duties is disrupted or where they experience Harassment, intimidation, or undue stress.

Each restriction will be:

- Tailored to the specific circumstances; and
- Implemented at the minimum level necessary to reduce the impact.

The Commissioner of Corporate Services and Chief Legal Officer will determine and implement appropriate restrictions. The Complainant will be notified in writing, clearly outlining:



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- The actions or behaviours that have led to the Restrictions being applied;
- The specific restrictions or measures being imposed; and
- The date when the restrictions will be reviewed.

The Commissioner of Corporate Services and Chief Legal Officer will also inform the Leadership Team and the Town Clerk of the action(s) taken.

If the Complainant's behaviour threatens Employee safety or security, or otherwise constitutes Harassment, appropriate measures under the Town's workplace health and safety policies will be implemented.

Stage 6 – Review of Restrictions

The Commissioner of Corporate Services and Chief Legal Officer will monitor upcoming review dates and ensure a review occurs at least four (4) weeks before any Restrictions are set to expire. In consultation with the Leadership Team as appropriate, the Commissioner will determine whether the restrictions should continue or be lifted.

The Complainant will be notified in writing of the outcome, including a new review date if the Restrictions remain in place.

8. New Complaints from Complainants Under Restrictions

Complaints about a separate or new issue from a Complainant who is currently subject to restrictions will be considered on their own merits. The Commissioner of Corporate Services and Chief Legal Officer, in consultation with the relevant People Leader, will determine whether any existing restrictions remain appropriate for the new Complaint.

Any decision to maintain or modify restrictions will be based on the nature, scope, and potential Detrimental Effect of the new Complaint, rather than being automatically applied due to the Complainant's previous interactions with the Town.

9. Maintaining Detailed Records

To ensure accountability and fairness, Employees must keep detailed records of all interactions with Complainants (e.g., emails, letters, notes of telephone conversations, and notes of in-person discussions). These records provide justification for any restrictions placed on a Complainant's access to Town Employees and must be retained in accordance with the Town's Records Retention By-law and Schedule.

10. Reference and Related Documents

- Council Code of Conduct for Members and Designated Boards – Corporate Policy
- Employee Code of Conduct – Corporate Policy
- Harassment, Sexual Harassment and/or Discrimination in the Workplace – Corporate Procedure
- *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56, as amended.
- Notice Prohibiting Entry – Corporate Policy
- *Occupational Health and Safety Act*, R.S.O. 1990, c 0.1

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- Public Code of Conduct – Parks and Recreation Procedure
- Service Excellence Guidelines – Corporate Procedure
- *Trespass to Property Act*, R.S.O. 1990, c. T.21
- Records Retention Schedule – Corporate Procedure
- Workplace Violence – Corporate Procedure

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR