BSP Bureau de la Sécurité privée

Dissatisfaction Management Framework

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OBJECT

The primary mission of the Bureau de la sécurité privée (hereinafter the ‘’BSP’’) is to ensure the protection of the public. In fulfilling this mission, it wishes to provide accessible, professional and respectful services, while remaining attentive to the individuals with whom it interacts.

This framework establishes the approach and principles that guide the BSP in the reception, analysis and treatment of the dissatisfactions that it is receives. It aims to ensure a process that is accessible, impartial, consistent and diligent, while enabling the BSP to benefit from the situations brought to its attention to improve its services and processes.

DISSATISFACTION MANAGEMENT

1. Objectives

The objectives of this framework are to:

- Simplify the expression of a dissatisfaction regarding the BSP's services, tools or personnel;
- Ensure effective, impartial and consistent processing of dissatisfactions;
- Inform the persons involved of the main processing steps and applicable timeframes;
- Ensure confidentiality of the information collected and integrity of the process;
- Encourage the rectification of situations when required and the continuous improvement of the BSP's services and processes.

2. Field of application

This framework applies to any dissatisfaction expressed by an individual concerning a service rendered by the BSP, a tool it makes available to the public, or the conduct of a staff member whether it is a department manager, the executive director, the Board of directors itself or one of its members.

It applies to all BSP's staff members as well as any person taking part in the processing of a dissatisfaction.

3. Framework scope and other specific remedies

The dissatisfaction management process does not replace other specific remedies, requests or mechanisms provided for by law or by another BSP process. Namely, it does not allow for the review or cancelation of a decision rendered by the BSP nor the suspension of a time limit to seek a remedy.

The appropriate specific process must be used when matters involve, namely:

- A complaint regarding the activities or conduct of a licence holder or carrying on a private security activity without a licence;
- A request for access to a document, access to personal information or for its correction;
- A complaint pertaining to the protection of personal information;
- The contestation or review of a decision rendered by the BSP, where a specific remedy is provided;
- A situation involving labour relations or another specialized internal mechanism.

Should an approach clearly fall under a different process, the BSP shall, to the extent possible, inform the individual of the correct mechanism. If a communication addresses multiple issues, each may be directed toward its applicable process.

4. Definitions

Term	Definition
Dissatisfaction	An expression of disagreement or dissatisfaction regarding a service, a tool or an interaction with the BSP, submitted to obtain an appropriate response, to rectify a situation or to contribute to service improvements.
Person involved	An individual expressing dissatisfaction, or on whose behalf dissatisfaction is presented with the necessary authorization.
Person responsible for the processing	An individual designated by the BSP to analyze a dissatisfaction, establish the facts, determine the appropriate follow-up, and communicate with the person involved.
Frivolous or vexatious communication	Communications that include namely hateful, threatening, excessive, incoherent or harassing comments, or whose repetitive nature without new information compromises the well-being of staff or the BSP's normal operations.
Unreasonable person	Any individual who has issued frivolous or vexatious communications on more than three occasions within a 12-month period or who has directed hateful or threatening comments towards staff or any other individual in their communications with the BSP.

5. Guiding Principles

Accessibility

The BSP ensures that the process remains simple and accessible. A form is provided on its website. Assistance is available to help individuals complete it, if needed.

Respect

Every individual is treated with courtesy and consideration. The BSP also expects all exchanges to be conducted with respect towards its staff and all other parties involved.

Impartiality
A dissatisfaction is assigned to an individual who possesses the necessary authority and impartiality to conduct an objective review. The person directly involve does not hold sole discretion over the outcome of the review.

Confidentiality
The information collected is accessible only to those required to receive, analyze or process the dissatisfaction, to ensure necessary follow-up, or fulfill a legal obligation.

Diligence
The BSP acknowledges receipt of dissatisfactions and conducts follow-ups within the announced timeframes. Should a review require additional time, the person involved will be notified.

Transparency
The BSP outlines the main stages of the process and communicates, to the extent permitted by law, the results of the review as well as measures taken, where appropriate.

Continuous improvement
The BSP uses the findings that arise from dissatisfactions to improve its services, tools, procedures and staff knowledge.

6. Steps in managing the dissatisfaction

6.1 Presentation of the dissatisfaction

6.1.1 Submitting a dissatisfaction

A dissatisfaction can be submitted by using the form available in the *Contact Us/Dissatisfaction* section of the BSP's website. Individuals experiencing difficulties while completing the form may receive assistance from a staff member by contacting us by phone or by visiting our offices in person.

To facilitate a proper review, the dissatisfied person is invited to provide their contact information, a clear description of the situation, any steps already taken, the individuals or services involved, relevant documentation and, if applicable, the desired outcome.

The BSP may request additional information should it be necessary to process the dissatisfaction. Insufficient information may limit the BSP's ability to examine the situation or to provide follow-up.

6.1.2 Dissatisfaction filed by another person

An individual may express a dissatisfaction on behalf of another person. However, the BSP will require a written authorization if confidential or personal information regarding that person must be disclosed.

6.2 Processing of the dissatisfaction

6.2.1 Acknowledgement and preliminary analysis

The BSP will issue a receipt acknowledgement within a maximum of two business days following the receipt of the dissatisfaction. It will then verify whether the matter falls within the current framework, whether the information provided is sufficient and to whom the processing should be assigned.

6.2.2 Assignment of the handling

To ensure the impartiality of the process, the processing of a dissatisfaction is assigned based on its subject matter:

Object of the dissatisfaction	Responsible party for the processing
Board of Directors or one of its members	Ministry responsible for the BSP, subject to validation of this mechanism.
Executive management	Presidency of the Board of Directors.
Staff members, managers, service, process, form or another BSP's tool	Executive management, with the cooperation of the directors concerned, when necessary.

6.2.3 Review of the situation

The person responsible for the processing reviews the information provided, collects any additional details necessary and, when required, obtains the statements of the persons involved. This review focuses on the relevant facts,

the applicable rules and the reasonable means to rectify the situation or prevent its recurrence.

The cooperation of the individual who expressed the dissatisfaction may be requested. The BSP may conclude the review when it becomes impossible to proceed due to insufficient information or a prolonged lack of cooperation, following an attempt to inform the individual.

6.2.4 Communication and follow-up

The BSP shall follow up with the person involved within a maximum of 30 business days following the receipt of the dissatisfaction. Once the review is complete, this follow-up will present the outcome of the processing and, to the extent permitted by law, the measures taken or contemplated.

If the review cannot be completed within this timeframe, the BSP will inform the individual of the status of the processing and, where possible, the additional time required. The confidentiality of information pertaining to third parties, staff members or decision-making processes may limit the level of detail provided.

6.2.5 Closure

A dissatisfaction is closed when the review and the necessary follow-ups are completed, when it is withdrawn, when it is referred to another process or when it is not possible to continue its processing. The closing of the file does not deprive the person of exercising a recourse provided for by law, subject to the applicable statutory deadlines.

7. Frivolous or vexatious communications and unreasonable individuals

The BSP addresses the substance of any dissatisfaction with an open mind, even when an individual expresses their discontent quite strongly. However, hateful, threatening or harassing comments, as well as excessive, incoherent or repetitive communications that does not offer any new elements, may jeopardize the staff safety or the normal operation of services.

7.1 Applicable criteria

An individual may be deemed unreasonable by the BSP if they meet one of the following criteria:

- They have engaged in frivolous or vexatious communications on more than three occasions during the last 12 months;
- They have employed hateful or threatening language in their communications with the BSP.

Decisions are based upon observed behaviours and communications, rather than the mere fact that an individual offers a critique, challenges a response, insists upon a follow-up or pursues a remedy. Each situation is evaluated according to its context, frequency and severity.

7.2 Notice and duration of registration

The name of an individual considered unreasonable is entered on an administrative list maintained by the Executive management office. When the BSP has their contact information, it informs them in writing of their registration, the reasons justifying it, the terms and conditions now governing their communications and the applicable duration. Otherwise, they will be informed on their next contact with the BSP.

The registration is withdrawn after a 12-month period without any further frivolous or vexatious communication, nor hate or threatening comments. The BSP may also reassess the registration earlier when circumstances warrant it.

7.3 Effects of registration

Individuals included on this list are requested to submit any further dissatisfaction via the online form. Depending on the circumstances, the BSP may designate a single point of contact, require that all communication be made in writing, restrict the frequency of its responses, or terminate any interaction involving unacceptable language.

These measures are intended to allow the BSP to address relevant requests while ensuring the protection of its staff and the continuity of its services. Being listed does not preclude an individual from presenting new relevant information, exercising a legal recourse, or using any other mechanism to which they are entitled. Any subsequent dissatisfaction will be reviewed in accordance with this framework, subject to the communication protocols previously communicated to them.

8. Organizational monitoring and continuous improvement

The BSP records dissatisfactions and their subsequent processing within an administrative register. The information contained therein is used to monitor files, identify recurring situations, evaluate processing times and determine necessary improvements.

Aggregated results are presented periodically to the board of directors' Ethics and Governance Committee. This report contains only the information necessary to conduct its mandate.

When dissatisfaction reveals an opportunity for improvement, the BSP may revise a tool or procedure, clarify the information disseminated, raise awareness or train its staff, strengthen control or conduct additional follow-ups.

9. Protection of personal information

The BSP solely collects the information necessary for the receipt, analysis and treatment of the dissatisfactions as well as for the subsequent organizational follow-up. This information is protected in accordance with the *Act respecting access to documents held by public bodies and the protection of personal information* and the BSP's governance rules regarding personal information.

The information may be disclosed to individuals or bodies required to know it for the purposes of addressing the situation or when permitted by law. They shall be retained and destroyed in accordance with the applicable retention rules.

10. Roles and responsibilities

10.1 Executive Management Office

- Receives dissatisfaction and collects the information necessary to process them;
- Conducts an impartial analysis of dissatisfactions, in cooperation with the departments concerned when necessary;
- Determines the actions to be taken in response to dissatisfaction and coordinates the measures adopted;
- Communicates with individuals who have expressed dissatisfaction and informs them of the results of their processing;
- Ensures compliance with timeframes and process consistency;
- Maintains the administrative register of dissatisfaction and produces accountability reports;
- Monitors the implementation of corrective measures and identified opportunities for improvement.

10.2 Managers

- Cooperate in the analysis of dissatisfaction related to their activities, including the identification of causes and appropriate corrective measures;
- Ensure the implementation of the measures selected in their department;
- Report to the Executive Management Office on the measures implemented and their results.

10.3 Staff members

- Inform individuals on how to submit a dissatisfaction and offer them the required assistance;
- Cooperate in addressing dissatisfactions when necessary;
- Maintain the confidentiality of the information to which they have access;
- Contribute to the implementation of selected improvements.

11.Effective date

This framework comes into effect on the date of its adoption by the BSP's Board of Directors. It is published on the BSP's website and is subject to revision as required by changes in the legal framework, services or practices of the BSP.

To address your questions related to the Dissatisfaction Management Framework:

By email:

insatisfactions@bspquebec.ca

In person or by mail:

Bureau de la sécurité privée
1611 Crémazie Boulevard East, Suite 500
Montréal (Québec) H2M 2P2

To the attention of: Bureau de la direction générale

By telephone:

Toll free: 1 877 748-7483