

# COC WORKPLACE CONDUCT POLICY

June 2021



Review date	Comes into effect on	Scope of Application	Location
June 30, 2021	July 1, 2021	COC Workplace	COC WEBSITE <a href="https://olympic.ca/canadian-olympic-committee/governance/policies/">https://olympic.ca/canadian-olympic-committee/governance/policies/</a>



## 1 PURPOSE

The Canadian Olympic Committee and the Canadian Olympic Foundation (collectively hereinafter referred to as the “COC”) are committed to building and preserving a safe, productive and healthy Workplace that is free from Discrimination, Harassment and Violence. The COC will not tolerate, ignore, or condone Discrimination, Harassment or Violence by or against any Worker (as defined in **Section 3**). The purpose of this Policy is:

- a) To promote, establish, and maintain a positive work environment that is free from Discrimination, Harassment and Violence and that treats every individual with dignity and respect;
- b) To the extent that Discrimination, Harassment and Violence does occur, to outline a clear reporting process and a mechanism for investigating and resolving any such incidents; and
- c) To meet the COC’s ethical and legal obligations to provide a Workplace that is free of Discrimination, Harassment and Violence under applicable provincial legislation.

## 2 SCOPE OF APPLICATION

This COC Workplace Conduct Policy (the “**Policy**”) applies to Discrimination, Harassment or Violence in the Workplace (as defined in **Section 3**) by or against a Worker.

This Policy also applies to behaviour occurring outside of the Workplace, when the behaviour is initiated by or directed at a Worker and when the behaviour adversely affects the Worker, the Workplace, the Worker’s working relationships or is detrimental to the image and reputation of the COC and may also include behaviour that is conducted online, on social media or through other communication platforms. Such applicability will be determined by the COC in its sole discretion.

### **Important note**

This Policy is intended to help the COC meet its workplace Violence and Harassment legal responsibilities under applicable provincial employment and occupational health and safety legislation.

The COC recognizes that some of the behaviours prohibited in this Policy are also prohibited in the *COC Code to Address Maltreatment in Sport* (the “**Code**”). Any Complaint that falls under the scope of application of this Policy but that is erroneously reported under the processes set out in the Code will be addressed in accordance with the process set out in this Policy, as the COC may in its absolute discretion decide. Where an allegation of misconduct involving a Worker is substantiated under this Policy and where such misconduct would also result in a violation of the Code, the COC may impose additional sanctions on the Respondent in accordance with the process set out in the Code. In seeking to determine whether a breach of the Code has



occurred and/or when seeking the appropriate sanction to impose, the COC may consult with or refer the matter to the Case Resolution Officer in accordance with the process set out in **Section 8** of the Code.

### **3 DEFINITIONS**

**“CEO”** means the Chief Executive Officer and Secretary General of the COC.

**“COC”** means the Canadian Olympic Committee and the Canadian Olympic Foundation. All references to decisions made by, or notifications made to, the COC shall be executed through the CEO or any other person designated by the CEO, unless they are involved in some way with the Complaint, in which case any decision made by, or notifications made to, the COC shall be through the President. Similarly, if the President is involved in some way with the Complaint, all references to decisions made by, or notifications made to, shall be executed by the Vice-President of the COC Board of Directors or another person designated by the Vice-President of the COC Board of Directors.

**“Code”** means the *COC Code to Address Maltreatment in Sport*.

**“Complaint”** A verbal or written Report of actual or suspected incident(s) of Discrimination, Harassment or Violence.

**“Complainant”** An individual who has made a Complaint about another individual who they believe committed an act of Discrimination, Harassment or Violence.

**“CPO”** means the Chief People Officer of the COC.

**“Discrimination”** Any action, behaviour or attitude, whether intentional or not, that results in differential treatment of one or more Workers, that affects working conditions, employment decisions or the work environment, and that is related to one or more of any grounds of Discrimination prohibited by human rights legislation, including but not limited to race or perceived race; ancestry; ethnic origin; citizenship; colour; religion or creed or religious belief, association or activity; disability; language (except where a language is a qualification for employment or office); marital/family status (defined to include common law relationships, and to not preclude anti-nepotism policies); political opinion; sex (defined to include pregnancy); age, record of offences (has the same definition as under the applicable human rights legislation); gender identity and gender expression; and sexual orientation.

An individual does not have to intend to discriminate for the behaviour to be Discrimination. It is enough if the individual knew or ought reasonably to have known that their behaviour would be inappropriate or unwelcome.

Examples of conduct that may be considered Discrimination include but are not limited to the following:



- derogatory comments and other vocal activity;
- stereotyping (assuming a Worker has certain traits, qualities or beliefs);
- racial, ethnic, or religious jokes, slurs, nicknames, or mimicry;
- practical jokes that cause awkwardness or embarrassment;
- persisting with comments or jokes after becoming aware that the behaviour is unwelcome;
- offering or withholding favours or employment benefits such as promotions, favourable evaluations, favourable assigned duties or shifts, conditioned on or related to a characteristic protected under any prohibited ground of Discrimination; and any unwanted physical touching, blocking, or impeding movements.

“**Employees**” means all Employees (full-time, part-time, permanent, fixed-term, casual or student) of the COC. For the avoidance of any doubt, consultants, contractors and other service providers are not considered Employees. For the purpose of this Policy, Employees shall also be considered as Workers (as defined hereunder).

“**Harassment**” means engaging in a course of repetitive vexatious conduct or comment that is known or ought reasonably to be known to be unwelcome that may affect a Worker’s dignity, psychological or physical integrity and that results in a harmful work environment for the Worker. A single serious conduct or comment can also constitute Harassment if it causes such harm for the Worker. **Reasonable action taken by an employer or manager relating to the management and direction of Workers or the Workplace is not Harassment.**

Examples of conduct that may be considered Harassment include but are not limited to the following:

- Bullying;
- Pranks, vandalism, bullying or hazing;
- Repeated offensive or intimidating phone calls or emails;
- Inappropriate sexual touching, advances, suggestions or requests;
- Displaying or circulating offensive pictures, photographs or materials in printed or electronic form;
- Psychological abuse;
- Excluding or ignoring someone, including persistent exclusion of a person from work-related social gatherings;
- Deliberately withholding information that would enable a person to do his or her job, perform or train;
- Sabotaging someone else’s work or performance;
- Gossiping or spreading malicious rumours;
- Intimidating words or conduct (offensive jokes or innuendos); and
- Words or actions which are known or should reasonably be known to be offensive, embarrassing, humiliating, or demeaning



**“Investigator”** has the meaning set forth in **Section 7**. This Investigator must be an unbiased internal party or an outside third party depending on the circumstances of the Complaint.

**“Person in Leadership”** means any of the following individuals: (i) any member of the COC Board of Directors, (ii) any member of the COC Senior Leadership Team, (iii) any individual in the COC’s Human Resources department or (iv) a Worker’s immediate supervisor and/or manager.

**“Policy”** has the meaning set forth in **Section 2**.

**“Report”** A Complaint of Discrimination, Harassment and/or Violence. A Report can be made verbally or in writing by a person in accordance with the process set out in this Policy.

**“Respondent”** An individual who is alleged to have committed an act of Discrimination, Harassment and/or Violence.

**“Sexual Harassment”** Engaging in a course of vexatious comment or conduct against a Worker in the Workplace because of sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the Worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Examples of conduct that may be considered Sexual Harassment include but are not limited to the following:

- Sexist jokes;
- Threats, punishment, or denial of a benefit for refusing a sexual advance;
- Offering a benefit in exchange for a sexual favour;
- Demanding hugs;
- Bragging about sexual ability;
- Leering (persistent sexual staring);
- Sexual assault;
- Display of sexually offensive material;
- Distributing sexually explicit messages or attachments such as pictures or video files;
- Sexually degrading words used to describe an individual;
- Unwelcome inquiries into or comments about an individual’s gender identity or physical appearance;
- Inquiries or comments about an individual’s sex life;
- Persistent, unwanted attention after a consensual relationship ends;
- Persistent unwelcome sexual flirtations, advances, or propositions; and
- Persistent unwanted contact.



**“Worker(s)”** means any of the following individuals: (i) Employees (as defined above) and (ii) any individual who performs work or supplies services to the COC for monetary compensation (including but not limited to: consultants, contractors, secondees and other service providers of the COC).

**“Workplace”** includes any land, premises, location or thing at, upon, in or near which a Worker performs their work. For the purposes of this Policy, “Workplace” includes any place where the business of the COC is being carried out, and other locations and situations such as during business travel, work-related social gatherings or other locations (including online, social media and other communication platforms) where the prohibited behaviour might have a subsequent impact on the work relationship, environment or performance.

**“Violence”** means any of the following: (i) the exercise of physical force by a person against a Worker, in the Workplace, that causes or could cause physical injury to the Worker; (ii) an attempt to exercise physical force against a Worker, in the Workplace, that could cause physical injury to the Worker; or (iii) a statement or behaviour that is reasonable for a Worker to interpret as a threat to exercise physical force against the Worker, in the Workplace, that could cause physical injury to the Worker.

Examples of conduct that would be considered Violence in the Workplace include but are not limited to the following:

- Prolonged staring in a hostile manner, shouting, blocking or impeding movement, or other aggressive behaviour;
- Verbally threatening to attack a Worker;
- Threatening gestures (e.g. shaking fists, throat-slitting or shooting gestures);
- Leaving threatening notes at or sending threatening emails to the Workplace;
- Hitting or trying to hit a Worker, including acts such as slapping, poking, kicking, pinching, grabbing and pushing a Worker;
- Throwing an object at a Worker;
- Destroying COC’s or another Worker’s property in the Workplace;
- Violence or threat of Violence against a Worker by a domestic or intimate partner that is not a Worker;
- Sexual Violence against a Worker; and
- Communications that endorse the use of any kind of weapons or Violence.

## **4 ROLES AND RESPONSIBILITIES**

### **4.1 Workers have a responsibility to:**

- a) Act respectfully toward other Workers while conducting work-related activities;
- b) Adhere to and attend all training related to this Policy;
- c) Report concerns, incidents and/or knowledge of Discrimination, Harassment or Violence (including threats) to a Person in Leadership; and



- d) Follow the measures and procedures set out in this Policy.

**4.2 In addition to the responsibilities described in 4.1 Managers have a responsibility to:**

- a) Promote a Discrimination, Harassment and Violence-free Workplace;
- b) Ensure that measures and procedures set out in this Policy are followed by Workers;
- c) Report any instances of Discrimination, Harassment or Violence to the CEO and CPO in accordance with the process set out in **Section 6.2**; and
- d) Ensure Workers are provided with the necessary information and instructions to protect themselves from risks of Discrimination, Harassment or Violence.

**4.3 In addition to the responsibilities described in 4.1 and 4.2, members of the Senior Leadership Team and individuals in the Human Resources department have the responsibility to:**

- a) Review this Policy and other related procedures at least once annually, or as often as is necessary to address any gaps or deficiencies identified as a result of an investigation; and
- b) Investigate and address all concerns, Complaints, or incidents of Discrimination, Harassment or Violence in a fair and timely manner while respecting Workers' privacy as much as possible.

## **5 WORKPLACE VIOLENCE**

### **5.1 Assessing Perceived Risk of Violence**

The COC will conduct a periodic review of working conditions to determine if and where Workers may be at risk of Violence in the Workplace. This will be conducted annually or more often on an as-needed basis, in conjunction with the COC's Joint Health & Safety Committee.

The COC Joint Health & Safety Committee will conduct a risk assessment of the work environment to identify potential risks that could affect the COC and the health and safety of Workers and will institute measures to eliminate or control any identified risks to Worker safety.

The following factors, among others, will be considered during the assessment:

- Past incidents of Violence;
- Violence that is known to occur in similar workplaces;
- The circumstances in which work takes place, including the type of work and conditions of work;
- The interactions that occur in the course of performing work; and
- The physical location and layout of the Workplace.

The risk assessment may include reviews of records, security reports, incident reports, staff perception surveys, health and safety inspection reports, first aid records, or other related records. Areas that will be



considered and may contribute to risk of Violence include but are not limited to contact with the public, exchange of money, and working alone or at night.

### **Risk of domestic violence**

The COC disapproves of violence against anybody in any form, whether as an act of Violence in the Workplace or in any Worker's personal life. The COC recognizes that domestic violence may have a significant impact on the Worker's personal life and that it may also have an impact in the Workplace.

An Employee who is a victim of domestic violence may access counseling services available through the COC's Employee Family Assistance Program ("EFAP") (see **Section 7.7** for details on how to contact EFAP) and may seek accommodations by raising the issue with a Person in Leadership.

Domestic violence must be promptly reported to a Person in Leadership if there is a potential risk of Violence in the Workplace. If the COC becomes aware that domestic violence is likely to expose Worker to Violence in the Workplace, the COC will take every precaution reasonable in the circumstances to protect the Worker.

### **5.2 Procedures in Violent Situations**

Where any person believes that Violence is imminent or is experiencing Violence, they are to:

- Avoid putting themselves or others in further risk
- Withdraw from the situation, if possible;
- Inform Workers or others nearby of the situation, if possible;
- Call 9-1-1 immediately if the risk cannot be avoided or if the situation requires immediate attention; and
- Report the incident by following procedures outlined below.

### **5.3 The Right to Refuse Unsafe Work**

Workers have the right to refuse work if they have a reason to believe that Violence is likely to endanger them. Upon refusing to work, the Worker must report the circumstance of the refusal to their manager/supervisor, a member of the Human Resources department or a member of the Senior Leadership Team. An investigation will follow in the presence of a Joint Workplace Health & Safety Committee Representative.

## **6 REPORTING PROCEDURES**

The following section outlines the procedures that apply to address and/or Report incidents of Discrimination, Harassment or Violence in the Workplace. Although the informal resolution process outlined



in **Section 6.1** is an option, Workers may proceed directly to reporting the Complaint under the process outlined in **Section 6.2**.

Each Worker should Report any instance of Discrimination, Harassment or Violence as soon as reasonably possible by following the process set out in this **Section 6**.

The COC reserves the right to modify any such procedures, as it deems appropriate, in order to achieve the goals of this Policy and comply with applicable legislation.

### **6.1 Informal Resolution**

**Workers who have been subjected to or have witnessed Discrimination, Harassment or Violence in the Workplace may wish to pursue informal resolution of the issue by following the steps described hereunder but are not required to do so. For greater certainty, informal resolution is not a pre-condition for reporting a Complaint.** At any time, a Worker can contact a Person in Leadership for advice and/or to Report a Complaint in accordance with **Section 6.2** below. If a Worker wishes to pursue an informal resolution, the following steps are recommended:

- a) Any Worker who is experiencing Discrimination, Harassment or Violence should not wait until a situation becomes intolerable or worsens. Sometimes, the person engaging in such conduct may not realize that their behaviour is offensive or unwanted and, in such cases, the misunderstanding can be cleared up quickly.
- b) In many cases, drawing early and informal attention to the matter giving rise to Discrimination, Harassment or Violence can fully resolve the situation. Wherever possible, Workers may try to resolve the matter themselves and may seek support from someone else if they consider that they need it.
- c) Workers may communicate with the person engaging in Discrimination, Harassment or Violence verbally or in writing. They should detail the unwelcome behaviour and request that it stop immediately. If the behaviour persists after speaking directly with the person engaging in such behaviour, the Worker should consider writing to the person in the same terms and keeping a copy of the correspondence. They can also Report the incident by following the process set out in **Section 6.2**.
- d) Whenever possible, it is also recommended that the Worker document the following information:
  - date and time of incident(s);
  - place;



- name of person alleged to have committed the Workplace Discrimination, Harassment or Violence;
  - details of what happened/was said;
  - names of any witnesses;
  - how they felt;
  - action taken (if any); and
  - copies of any documents that may be relevant, e.g., a letter or a note, copy of an email.
- e) If informal resolution fails to resolve the issue or if the circumstances are such that informal resolution is not possible or appropriate, the reporting process outlined in **Section 6.2** below should be followed.

## **6.2 Reporting Procedure**

Complaints of Discrimination, Harassment or Violence should be reported to a Person in Leadership as soon as reasonably possible.

The report can be made verbally or in writing and should include the following information (if possible):

- The date, time and place of the incident;
- The name of any persons involved in the incident;
- The name of any persons who witnessed the incident (if applicable);
- A description of what occurred;
- Actions taken (if any); and
- Copies of any documents that may be relevant, e.g., a letter or a note, copy of an email.

Once a Complaint has been Reported, the Person in Leadership to whom the Complaint was made, shall inform the CEO and CPO of the Complaint, unless one or more of them is the subject of the Complaint (in which case only the other shall be informed). No Person in Leadership who is the subject of the Complaint, or who has a material personal interest in the matter, shall participate in the complaint resolution process (except as may be required for the implementation of this Policy).

## **6.3 COC Policy Statement on Whistleblowing**

A Worker may also Report any incidents of Discrimination, Harassment or Violence confidentially and/or anonymously through the process described in the *COC Policy Statement on Whistleblowing* without fear of Harassment or retaliation. If the Complainant wishes to remain anonymous, it may however not be possible for the COC to conduct an appropriate investigation and/or adequately address the situation.



## 7 INVESTIGATION PROCEDURES

### 7.1 Conducting the investigation

Once a Complaint has been Reported, the CEO and CPO shall decide whether to proceed with the Complaint, and if so, whether to conduct an internal investigation, or whether to appoint an external investigator (in each case, the “Investigator”). This Investigator must be an unbiased internal party or an outside third party depending on the circumstances of the Complaint. Whether internal or external, the Investigator must have no interest in the outcome of the investigation and the investigation shall be guided by recognized industry standards for investigations. The investigation will be conducted as quickly as possible, given the circumstances of the case, and will be completed as soon as practicable, but normally within 90 days.

Unless otherwise stated below, the CPO will have carriage of the matter and will keep the CEO informed as appropriate throughout the investigation and Complaint resolution process outlined below:

- If the CPO is the subject of the Complaint, the CEO shall have sole carriage of the matter and all future references to the CPO in this section shall be replaced by the CEO.
- If the CEO or a member of the COC Board of Directors is the subject of the Complaint, the President shall have sole carriage of the matter and all future references to the CPO in this section shall be replaced by the President.
- If the President is the subject of the Complaint, the Vice-President of the COC Board of Directors shall have sole carriage of the matter and all future references to the CPO in this section shall be replaced with the Vice-President of the COC Board of Directors.

Confidentiality will be maintained throughout the investigation to the greatest extent possible and circulation of information will be minimized to that which is necessary to ensure fair treatment of all parties. Information, including without limitation the identity of witnesses involved in the investigation, will only be disclosed strictly on a “need to know” basis, if necessary, for purposes of investigating or taking corrective action with respect to the Complaint, or as otherwise required by law.

The Investigator will separately interview the Complainant and the Respondent as soon as reasonably possible. Parties may be requested to sign their statement. The Investigator must give the Respondent an opportunity to explain their perception of events and to respond to the Complainant’s account of events. The Investigator will review the interviews and document any inconsistencies or other questions they may have. The Investigator may conduct further interviews of the parties if needed to clarify any information.

Pending the conclusion of the investigation, the COC also may take appropriate interim measures and corrective action against the Respondent (e.g., i.e: temporary changes to reporting relationships, asking a party to work from home, suspension or administrative leave with or without remuneration, temporary schedule changes or temporary re-assignment, re-training, relocation).



All individuals involved in the investigation are required to:

- a) Cooperate fully in the investigation and resolution of any concerns, incidents and Complaints;
- b) Respect the need for confidentiality. This means they must refrain from discussing the Report, the incident(s) or Complaint, or the existence of (or their involvement in) any investigation of a concern, incident or Complaint, except as strictly required for the purposes of any investigation and resolution, to obtain advice about their rights, or as otherwise compelled by law. **This is a critically important obligation and any breach of this confidentiality obligation will be treated as serious misconduct and a violation of this Policy, the COC Code of Ethics and/or the Code;** and
- c) Refrain from any form of reprisal against anyone involved in the investigation.

## 7.2 Results of Investigation

- a) Once the investigation is completed, the Investigator will:
  - Determine whether the acts complained of constitute Discrimination, Harassment or Violence; and
  - Produce a written report summarizing the investigation and forward it to the CPO for review and discussion.
- b) Once the investigation is completed, the COC will:
  - Where a concern, incident, or Complaint is substantiated, take appropriate disciplinary and corrective action against the Respondent. In appropriate situations, the COC may contact law enforcement officials and/or initiate legal action; and
  - Where a concern, incident or Complaint is not substantiated, as long as the Report was made in good faith, there will be no repercussions against the Complainant.
- c) Once the investigation is completed, the Complainant and Respondent will:
  - Be informed in writing of the results of the investigation; and
  - Be informed of any corrective action that has been taken or that will be taken as a result of the investigation.

## 7.3 Disciplinary and Correctives Measures

Whenever any individual is found to have engaged in conduct that constitutes a breach of this Policy, the COC will take appropriate disciplinary and corrective action to address the situation.



Disciplinary steps range from informal (e.g. a verbal reprimand) to formal (e.g. a suspension without pay), and from less serious to more serious (e.g. a demotion, removal of privileges, suspension from certain activities), up to and including, in appropriate cases, termination for cause or cancellation of an engagement/contract.

Corrective steps range from unstructured (e.g. requiring an apology, rearranging the workspace) to more structured (e.g. rearranging reporting relationships, requiring attendance at Harassment/sensitivity/anger management training sessions).

If the Respondent is not an Employee, the COC will take available appropriate action (e.g. notification of the individual's employer, cancellation of a contract, or a ban from the Workplace).

The selection of the appropriate disciplinary and corrective action, or any action to be taken, will be in the COC's sole discretion. What is appropriate in any given situation will vary and will depend on a number of factors including (among other things) the nature and seriousness of the problem, and whether this is a new or recurrent problem.

### **Criminal Offences**

In appropriate situations, the COC may contact law enforcement officials or initiate legal action against a Respondent. Upon receiving a Complaint, or upon receiving a finding that a Worker has engaged in a criminal offence (including but not limited to those cited below), the COC may determine that the matter must be reported to a governmental entity or local police service.

- a) Any child pornography offences;
- b) Any sexual offences;
- c) Any offence of physical Violence;
- d) Any offence of assault; and
- e) Any offence involving trafficking of illegal drugs.

Such criminal offences may result in immediate disciplinary action up to and including termination of employment for just cause.

### **7.4 Interaction with the COC Code to Address Maltreatment in Sport**

Where a Complaint involving a Worker is substantiated under this Policy and where the conduct alleged in the Complaint would also result in a violation of the Code, the COC may impose additional sanctions on the Respondent in accordance with the process set out in the Code. In seeking to determine whether a breach of the Code has occurred and/or when seeking the appropriate sanction to impose, the COC may consult with or refer the matter to the Case Resolution Officer in accordance with the process set out in **Section 8** of the Code.



## 7.5 Recordkeeping

The COC will ensure that appropriate records of Complaints and investigations relating to incidents of Workplace Discrimination, Harassment and Violence are kept, including:

- A copy of the Report or details about the incident;
- Any records related to the investigation, including notes;
- A copy of the investigation report (if applicable);
- A copy of any corrective action taken to address the Complaint or incident.

## 7.6 Reprisal Prohibited

The COC will not tolerate any form of reprisal against a Worker for reporting possible incidents of Discrimination Harassment and Violence or participating in investigations of Complaints of any kind. Retaliation includes but is not limited to threatening, intimidating, harassing, coercing or any other conduct that would discourage a reasonable person from engaging or participating in the complaint resolution process.

Anyone who believes they, or someone they know have been subjected to unlawful reprisal must promptly report the concerns to a Person in Leadership.

## 7.7 Recommendations to victims

The COC will provide appropriate assistance to any Worker who is a victim or affected by Discrimination, Harassment or Violence in the Workplace. The COC recommends that any Worker who has been harmed as a result of an incident of Discrimination, Harassment or Violence consult their health care provider for treatment or referral for post-incident counselling, if appropriate.

An Employee may also use the COC's Employee Family Assistance Program (EFAP) with LifeWorks available at <https://www.workhealthlife.com> or 1-844-880-9142.

## 7.8 Fraudulent or Malicious Complaints

It is a violation of this policy for anyone to knowingly make a false Complaint, or to provide false information about a Complaint. Unfounded or frivolous allegations may cause both the Respondent and the COC significant damage. Any Worker who knowingly makes a false allegation related to Workplace Discrimination, Harassment or Violence will be subject to immediate disciplinary action, up to and including termination of employment.



### 7.9 Confidentiality

To the extent possible, the COC will not disclose the name of a Complainant or a Respondent or the circumstances related to the Complaint to any person except where disclosure is necessary to investigate the Complaint or take corrective action with respect to the Complaint, required by law, or required under the Code.

## **8 TRAINING AND POLICY REVIEW**

The COC will provide information and training sessions on a regular basis, and at least as soon as there are substantial changes to this Policy and each new person joining the organization.

In accordance with applicable provincial legislation, this policy will be posted in a conspicuous place in the Workplace and reviewed annually.