



DURHAM DISTRICT SCHOOL BOARD

NOTICE OF MEETING

**GOVERNANCE AND POLICY COMMITTEE
PUBLIC SESSION**

Chair: Emma Cunningham
Vice Chair: Kelly Miller

DATE: Wednesday, October 30, 2024
TIME: 6:00 p.m.
LOCATION: Hybrid
ATTACHMENTS: Agenda

Copies to:
All Trustees and Student Trustees
Director of Education
All Superintendents

REVISED AGENDA - GOVERNANCE AND POLICY COMMITTEE MEETING
Wednesday, October 30, 2024
7:00 p.m.

	PAGE
1. <u>Call to Order</u>	Verbal
2. <u>Land Acknowledgement</u>	Verbal
<p>The Durham District School Board acknowledges that many Indigenous Nations have longstanding relationships, both historic and modern, with the territories upon which our school board and schools are located. Today, this area is home to many Indigenous peoples from across Turtle Island. We acknowledge that the Durham Region forms a part of the traditional and treaty territory of the Mississaugas of Scugog Island First Nation, the Mississauga Peoples and the treaty territory of the Chippewas of Georgina Island First Nation. It is on these ancestral and treaty lands that we teach, learn and live.</p>	
3. <u>Declarations of Interest</u>	Verbal
4. <u>Motion to Approve Agenda</u>	Verbal
5. <u>Minutes</u>	
(a) DRAFT minutes of the Governance and Policy Committee meeting of September 25, 2024	1 – 3
6. <u>Recommended Actions</u>	
(a) Revised Director of Education Performance Appraisal Policy (General Counsel Patrick Cotter)	4 – 12
(b) Revised Complaints Protocol (General Counsel Patrick Cotter)	13 – 30
7. <u>Information Items</u>	
8. <u>Other Business</u>	Verbal
9. <u>Adjournment</u>	Verbal



**DRAFT Minutes – Governance and Policy Committee Meeting
Wednesday, September 25, 2024 6:00 p.m., Hybrid**

1. Call to Order

Trustee Emma Cunningham, Committee Chair, called the meeting to order at 6:02 p.m.

Members Present: Trustees Michelle Arseneault, Tracy Brown, Donna Edwards, Mark Jacula, Stephen Linton (virtual, arrived 6:20 p.m.), Kelly Miller, Carolyn Morton, Deb Oldfield, Shailene Panylo (virtual), Student Trustee Nitishan Poopalasundaram (virtual)

Regrets: Trustee Christine Thatcher, Student Trustees Kayla Hoare, Shampavi Vijayakumar

Staff Present: Director of Education Camille Williams-Taylor, Associate Director Jim Markovski, General Counsel Patrick Cotter, Senior Manager Dervla Kelly

Recording Secretary: Gillian Venning

2. Land Acknowledgment

Trustee Emma Cunningham gave the Land Acknowledgement: the Durham District School Board acknowledges that many Indigenous Nations have longstanding relationships, both historic and modern, with home to many Indigenous peoples from across Turtle Island (North America). We acknowledge that the Durham Region forms a part of the traditional and treaty territory of the Mississaugas of Scugog Island First Nation, the Mississauga Peoples and the treaty territory of the Chippewas of Georgina Island First Nation. It is on these ancestral and treaty lands that we teach, learn and live.

3. Declarations of Interest

There were no declarations of interest.

4. Approval of Agenda

MOVED by Trustee Mark Jacula
SECONDED by Trustee Carolyn Morton

THAT THE AGENDA BE APPROVED.

CARRIED

5. Minutes

(a) Draft minutes of the Governance and Policy Committee meeting of May 29, 2024

MOVED by Trustee Donna Edwards
SECONDED by Trustee Tracy Brown

THAT THE DRAFT MINUTES OF THE MAY 29, 2024 GOVERNANCE AND POLICY COMMITTEE MEETING BE APPROVED.

CARRIED

6. Information Items

There were no information items discussed.

7. Recommended Actions

(a) Bylaws – Public Question Period

General Counsel Patrick Cotter provided an overview of the report, which follows up on the Governance and Policy Committee meeting of April 24, 2024, where a motion to eliminate public question period was deferred. A summary of the ways in which members of the community can engage with the DDSB was provided.

There were no trustee questions.

MOVED by Trustee Donna Edwards

THE GOVERNANCE AND POLICY COMMITTEE RECOMMENDS TO THE BOARD OF TRUSTEES THAT SECTIONS 5.12.13 THROUGH TO 5.12.16 OF THE DDSB BYLAWS BE DELETED IN ORDER TO REMOVE PUBLIC QUESTION PERIOD FROM THE BOARD AGENDA AND THAT THE MATTER PROCEED TO THE NEXT MEETING OF THE BOARD OF TRUSTEES.

CARRIED

(b) Bylaws – Filling Trustee Vacancies

General Counsel Patrick Cotter provided an overview of the report, summarizing the proposed amendments to the sections of the bylaws applicable to filling trustee vacancies, which are intended to streamline the process in future should the need for a vacancy process arise.

Discussion took place and trustee questions were answered.

3

MOVED by Trustee Carolyn Morton

THAT THE GOVERNANCE AND POLICY COMMITTEE RECOMMEND TO THE BOARD OF TRUSTEES THAT SECTION 6.2 OF THE BYLAWS BE AMENDED AS NOTED IN APPENDIX A OF THIS REPORT AND THAT THE MATTER PROCEED TO THE NEXT MEETING OF THE BOARD OF TRUSTEES.

Further discussion took place and the following motion was moved, which took precedence:

MOVED by Trustee Donna Edwards

THAT REVISIONS TO THE BYLAWS – FILLING TRUSTEE VACANCIES BE DEFERRED TO A FUTURE MEETING OF THE GOVERNANCE AND POLICY COMMITTEE SO THAT THE COMMITTEE CAN ADDRESS CONCERNS BROUGHT FORWARD AROUND THE VETTING, CANDIDATE POOL AND SELECTION PROCESS.

CARRIED

(c) Electing Members to OPSBA

Trustee Donna Edwards provided an overview of the matter, intended to clarify expectations around the annual election and term of office of DDSB trustees elected to the Ontario Public School Board Association as the term of office is June to June while the typical cycle of elections takes place each year in November.

Trustee questions were answered. Discussion took place and it was confirmed that the OPSBA voting member and alternate voting member will be elected at the annual Organizational Meeting, with a note to indicate the term of office of those who are elected will not begin until the following June.

8. Other Business

There was no other business discussed.

9. Adjournment

MOVED by Trustee Deb Oldfield
SECONDED by Trustee Kelly Miller

THAT THE MEETING DOES NOW ADJOURN.

CARRIED

The meeting adjourned at 6:38 p.m.

DURHAM DISTRICT SCHOOL BOARD ADMINISTRATIVE REPORT

REPORT TO: Governance and Policy Committee

DATE: October 30, 2024

SUBJECT: Revised Director of Education Performance
Appraisal Policy

PAGE: 1 of 2

ORIGIN: Patrick Cotter, General Counsel

The Durham District School Board recognizes Indigenous rights are distinct. In the exercise of those rights, Indigenous staff and students shall not be subjected to actions with the aim or effect of depriving these distinct rights.

The Durham District School Board is committed to providing learning and working environments that centre human rights and equity and are safe, welcoming, respectful, equitable, accessible, inclusive, and free from all forms of discrimination, oppression, harassment, and harm.

1.0 **Abstract**

The Director of Education Performance Appraisal Policy (the Policy) establishes the process through which the Board of Trustees reviews the performance of the Director of Education on an annual basis in accordance with the terms of the Education Act and the Regulations thereunder. A minor revision is proposed to more expressly align the language the policy with the regulations. It is recommended that the Governance and Policy Committee approve the revised policy and recommend that it be adopted by the Board of Trustees at its next meeting.

2.0 **Purpose**

The purpose of this report is to present revisions to the Director of Education Performance Appraisal Policy for consideration by the Governance and Policy Committee.

3.0 **Background & Analysis**

The Policy has been in force since 2020. Provincial Regulations under the Education Act required revisions to the Policy in May 2024. Since then, it is noted that a minor amendment could be made to make the language in the policy better align with the Regulations.

Proposed revised language is set out in section 4.6.11 of Appendix “A”.

4.0 Communication/Implementation Plan

If adopted by the Board of Trustees, the revised policy will be circulated to relevant staff and to the Board of Trustees.

5.0 Conclusion/Recommended Action

That the Governance and Policy Committee approve the revisions to the Director of Education Performance Appraisal Policy as noted in Appendix A, and that the matter proceeds to the Board of Trustees for consideration at its next meeting.

6.0 Appendices

Appendix A – Revised Director of Education Performance Appraisal Policy (tracked changes)

Report reviewed and submitted by:



Patrick Cotter, General Counsel

Director of Education Performance Appraisal

1.0 Rationale

- 1.1 The Director of Education is responsible for implementing the elected Board of Trustees's Multi-Year Strategic Plan and Policies, and has overall responsibility for staff, operations, and programs at the Durham District School Board ("DDSB").
- 1.2 One of the key responsibilities of the Board of Trustees is to monitor and evaluate the performance of the Director of Education in meeting the obligations of the position under the *Education Act*, the Board's Policies and Procedures and the Board's Multi-Year Strategic Plan.
- 1.3 The Board of Trustees is committed to ethical leadership, a healthy workplace culture and to fostering public confidence in our system. This policy supports these commitments.
- 1.4 Ontario Regulations 83/24 under the Education Act (the "Appraisal Regulations") stipulates certain minimum requirements for the Director of Education's performance appraisal. This policy incorporates the requirements of the Appraisal Regulations.

2.0 Policy Objective

- 2.1 The objective of the Director's Performance Appraisal Policy is to establish a transparent and objective process for the Board of Trustees to appraise the Director of Education's performance, to ensure compliance with the Appraisal Regulations, and to set a proactive framework to support the Director of Education in achieving the performance expectations of the position.
- 2.2 This policy is to be interpreted and applied in accordance with the DDSB's commitment to promoting and upholding Indigenous rights, human rights, and the Safe and Respectful Workplace and Harassment Prevention Policy in all of its learning and working environments. To align with this commitment, all performance appraisal assessment tools, meetings and processes will be accessible and will uphold rights and responsibilities under these policies and procedures.

3.0 Application

- 3.1 The performance of the Director of Education is appraised annually in accordance with the terms of this policy and the Appraisal Regulations. The employment contract of the Director of Education shall be subject to this policy regarding the Director's performance appraisal.
- 3.2 The Director of Education performance appraisal is confidential and will be conducted in private, in accordance with the provisions of Section 207(2)(b) of the *Education Act*. Therefore, any reference in this policy to the Board of Trustees includes reference to the Committee of the Whole Board, as appropriate.
- 3.3 The Board of Trustees will keep the public informed as to when the annual appraisal has been completed by annually posting written confirmation that the performance appraisal has been completed together with the list of the parties under section 4.3.2 (i) that provided input into the appraisal.

4.0 Process

4.1 Director of Education Performance Appraisal Committee

4.1.1 There shall be a Director of Education Performance Appraisal Committee (“Committee”), the terms of reference of which are to:

- (i) In consultation with the Director of Education, oversee the selection of, or renewal of the engagement of, an external consultant with at least five years of experience conducting multi-source executive performance assessments;
- (ii) Work with the external consultant to implement the Director of Education’s Performance Appraisal in accordance with this policy and the Appraisal Regulations and to carry out any other activities specified in this policy; and
- (iii) Work with the external consultant to develop and implement the self-assessment performance evaluation tools for the Director of Education.

4.1.2 There shall be a minimum of three Trustees and a maximum of seven Trustees on the Committee. The membership of the Committee shall be established by the Board annually at the Organizational Meeting.

4.1.3 The members approved at the annual Organization Meeting shall constitute the Committee effective as of the following May 15 with responsibility for the period commencing on July 1 and ending on June 30 of the following year.

4.1.4 If the Committee is reduced to less than three members, then additional members shall be placed on the Committee by the Board of Trustees.

4.2 Performance Plan

4.2.1 The Chair of the Committee shall, together with the other members of the Committee and the external consultant, work in collaboration with the Director of Education to annually prepare a Performance Plan document for the upcoming evaluation cycle. The Performance Plan shall be finalized by July 31. The Chair of the Committee will thereafter, and by no later than August 15: share a copy of the Performance Plan with members of the Board of Trustees; post on the Board’s website confirmation of finalization of the Performance Plan; and provide the requisite written notice to the Minister.

4.2.2 The Performance Plan shall include the following:

- 1) A list of the actions that the Director of Education will implement during the evaluation cycle to achieve each of the following goals:
 - i. Advance the provincial priorities in education in the area of student achievement set out in Ontario Regulation 224/23 (Provincial Priorities in Education - Student Achievement).
 - ii. Manage human, capital and fiscal resources to achieve the goals identified in the Board’s multi-year plan developed under clause 169.1(1) (f) of the Education Act.
 - iii. Promote a healthy and inclusive workplace with effective systems for staff selection and oversight.

- iv. Create and maintain respectful and collaborative relationships with students, parents/guardians, staff, school board communities, community partners and stakeholders, Ministry staff and the Minister.
 - v. Demonstrate leadership that maintains or improves the reputation of and public confidence in the board.
 - vi. Ensure compliance with, and uphold responsibilities under, applicable laws, Ministry policies and guidelines, and Board mandates, in a manner consistent with section 2.2.
- 2) Identification of leadership competencies and practices needed to achieve the goals set out in paragraph 1 and actions that the Director of Education shall implement during the evaluation cycle to improve at least one of those competencies or practices.
- 3) One or more methods of:
- i. Determining whether the Director of Education successfully implemented the actions set out in the Performance Plan during the evaluation cycle, and
 - ii. Measuring, qualitatively or quantitatively, the degree to which the actions achieved the goals set out in paragraph 1.
- 4) Any additional appraisal elements determined by the Committee, in consultation with the external consultant and with input from the Director of Education. If the additional appraisal elements include additional goals, a list of the actions that the Director of Education will implement during the evaluation cycle to achieve those goals.
- 4.2.3 The actions listed under paragraph 1 of section 4.2.2 shall include professional development activities that the Director of Education will undertake during the evaluation cycle.
- 4.2.4 The leadership competencies and practices identified under paragraph 2 of 4.2.2 shall be described in accordance with any guideline issued by the Minister under subsection 287.6 (1) of the Education Act.
- 4.2.5 Near the end of the evaluation cycle, and by no later than June 10, the Director of Education shall update the Performance Plan to include the following:
- 1) Confirmation of which of the actions listed for the purposes of paragraphs 1, 2 and 4 of section 4.2.2 have been implemented by the Director of Education during the evaluation cycle;
 - 2) A description of how each action that was implemented assisted in achieving the goals set out in paragraphs 1 and 4 of section 4.2.2, as applicable; and
 - 3) For each action that was not implemented by the Director of Education, a rationale for why the action was not implemented.
- 4.2.6 The Director of Education and the Chair of the Committee shall each sign the Performance Plan and each of them shall retain a copy for at least six years. The Committee Chair's copy shall be held in a secure cabinet in the office of the General Counsel.

4.3 Annual Performance Appraisal

- 4.3.1 The Committee will facilitate the annual appraisal which shall culminate in the *Performance Appraisal Report*, a complete and concise confidential report on the results of a performance appraisal, which shall be submitted to the Board for approval.
- 4.3.2 Each full evaluation cycle shall commence on July 1. The performance appraisal in a full evaluation cycle shall consist of the following:
- (i) In the first full evaluation cycle and every second full evaluation cycle thereafter, a *performance appraisal questionnaire*, to be completed anonymously, to collect feedback and data on the performance of the Director of Education. The following parties are to be asked to complete a *performance appraisal questionnaire*:
 - (a) All members of the Administrative Council and any other person that reports directly to the Director of Education.
 - (b) All Trustees.
 - (c) Student Trustees.
 - (d) Each member of every statutory, ad hoc or other committee of the Board.
 - (e) Members of any Advisory Committees established by the Board.
 - (f) Each parent/guardian member of the school community council at each school of the Board.
 - (g) One representative nominated by and from each of the Board's local unions, federations and the Ontario Principals' Council local representative.
 - (h) Parent Council Chair.
 - (i) A representative sample of community groups and partners, as identified by the Committee with input from the Director of Education, and
 - (j) If required under the terms of the Appraisal Regulations, the Minister of Education (which feedback may be provided using a performance appraisal questionnaire or such other manner as the Minister may deem appropriate).
 - (ii) The completion of a self-assessment performance evaluation tool by the Director of Education in order to facilitate the update of the Performance Plan by the Director of Education as called for in section 4.2.5 above.
 - (iii) The *performance appraisal questionnaire(s)* and the self-assessment performance evaluation tool shall be prepared by the external consultant based on the objectives of this policy and the Performance Plan utilizing their independent professional judgment and in consultation with the Committee and the Director of Education.

4.4 Mid-Year Review

- 4.4.1 There shall also be a mid-year review in which the Chair of the Committee shall, through the external consultant, solicit and collect feedback from members of the Board of Trustees using a *performance appraisal questionnaire*. The questionnaire shall be provided to members of the Board by no later than January 11 and shall be completed and returned to the external consultant by no later than January 21. The external consultant shall summarize the results in a report and shall facilitate a meeting between members of the Committee and the Director of Education to review progress toward implementing the actions and achieving the goals set out in the Performance Plan and to discuss other matters relevant to the Performance Plan.

4.5 Interim Evaluation

- 4.5.1 Any newly hired Director of Education may be subject to an initial interim evaluation before starting a full evaluation cycle (which always commences on July 1). The steps and timing of an interim evaluation are as set out in the Appraisal Regulations.

4.6 Performance Appraisal Report

- 4.6.1 The Committee shall, through the external consultant, prepare a draft performance appraisal report summarizing the performance appraisal, setting out a performance rating and providing an explanation for the rating. In this regard, the Committee shall assign one of the following performance ratings to the Director of Education:

- 1) Meets all expectations.
- 2) Meets most expectations.
- 3) Meets some expectations.
- 4) Does not meet expectations.

- 4.6.2 In preparing the report and determining which performance rating to assign to the Director of Education, the Committee shall consider the following factors:

- 1) The extent to which the Director of Education worked diligently and consistently toward the implementation of the actions identified in the Performance Plan.
- 2) The efforts made by the Director of Education to engage Board staff, community partners and stakeholders, and others in the development of the goals and implementation of the actions identified in the Performance Plan.
- 3) The degree of success the Director of Education had in achieving the goals set out in the Performance Plan, as informed by data available to the Board including the feedback and information set out in any report under section 4.3 of this policy and the information collected by any school climate surveys (under section 269.1(2.1) of the *Education Act* in respect of the evaluation cycle, if applicable.
- 4) The rationale provided by the Director of Education for the actions that were not implemented and the goals that were not achieved.
- 5) The effectiveness of efforts made to overcome challenges faced by the Director of Education in implementing the actions identified in the Performance Plan.
- 6) The demonstrated ability and willingness of the Director of Education to address, in the future, the actions that were not implemented and goals that were not achieved.

- 4.6.3 The Chair of the Committee shall by no later than June 20, through the external consultant, provide a draft of the *Director's Appraisal Report* to every member of the Board of Trustees for review and comment. Comments are to be provided by no later than June 30.

- 4.6.4 The draft report is also to be provided to the Director of Education by no later than July 7.

- 4.6.5 Thereafter, and by no later than July 31, the Chair of the Committee and the other members of the Committee shall, together with the external consultant, meet with the Director of Education to

obtain comments from the Director of Education as to the contents of the draft Director's Appraisal Report, including the performance rating and explanation for the rating.

- 4.6.6 The feedback from the members of the Board and from the Director of Education shall be considered by the Committee, in consultation with the external consultant.
- 4.6.7 The Committee shall, through the external consultant, advise the Director by no later than August 1st whether and how it proposes to address any Feedback from the Director of Education in the final report.
- 4.6.8 In the event that the Director of Education does not agree with the Committee's proposal as to the final report, the Director may advise the external consultant of the objection, following which the external consultant shall coordinate a dispute resolution panel. The deadline for the Director doing so is August 2nd. The panel shall consist of the following:
- (a) One panel member selected by the Director of Education
 - (b) A second panel member selected by the Chair of the Committee and
 - (c) A third panel member of the panel with expertise in mediation, suitable to the two other panel members.
- 4.6.9 The panel members may not be employees of the DDSB. The panel shall control its procedure with a view to a fair but informal and expeditious proceeding that must be concluded by no later than August 8th. This is not a proceeding to which the *Statutory Powers Procedures Act* applies. The panel shall consider all relevant information presented by the Committee, the Director of Education. The panel may request submissions from the external consultant. The conclusion of this process will be a non-binding recommendation(s) from the panel to the Committee as to the form and content of the final report.
- 4.6.10 The final report shall be completed by the Committee and provided to the Board of Trustees and the Director of Education by August 10. The Board of Trustees shall adopt the final report by way of resolution (the contents of the report shall remain confidential) by no later than August 15.
- 4.6.11 By August 15, the Chair of the Board shall post and deliver the requisite notices and confirmations as called for in the Appraisal Regulations regarding the completion of the appraisal.

5.0 Evaluation

- 5.1 This policy may be reviewed and updated as may be deemed necessary or appropriate, but it shall be reviewed at least every 5 years.

6.0 Reference Documents

- 6.1 The Education Act
- 6.2 [Indigenous Education Policy](#)
- 6.3 [Human Rights, Anti-Discrimination and Anti-Racism Policy](#)
- 6.4 Safe and Respectful Workplace and Harassment Prevention Policy

Appendix:
None

Effective Date:
2020-07-09

Reviewed and Amended:
2024-05-21
2024 -xx-xx

DURHAM DISTRICT SCHOOL BOARD ADMINISTRATIVE REPORT

REPORT TO: Governance and Policy Committee

DATE: October 30, 2024

SUBJECT: Revised Complaints Protocol

PAGE: 1 of 2

ORIGIN: Patrick Cotter, General Counsel

The Durham District School Board recognizes Indigenous rights are distinct. In the exercise of those rights, Indigenous staff and students shall not be subjected to actions with the aim or effect of depriving these distinct rights.

The Durham District School Board is committed to providing learning and working environments that centre human rights and equity and are safe, welcoming, respectful, equitable, accessible, inclusive, and free from all forms of discrimination, oppression, harassment, and harm.

1.0 **Abstract**

This report provides proposed amendments to the Complaints Protocol of the Board Member Code of Conduct in response to recent legislative changes, which will come into force on January 1, 2025. It is recommended that the Governance and Policy Committee approve the proposed revisions and recommend that they be adopted by the Board of Trustees at its next meeting.

2.0 **Purpose**

The purpose of this report is to recommend amendments to the Complaints Protocol of the Board Member Code of Conduct, to ensure that it aligns with new legislative requirements that come into force on January 1, 2025.

3.0 **Background & Analysis**

In July 2024, significant changes were made regarding the legislated requirements for Code of Conduct issues involving trustees. There are three significant changes:

- The changes require that all school boards make use of an experienced Integrity Commissioner to investigate complaints. Of course, this was something that this Board has had in place for many years;
- The changes also removed the power of school boards to impose sanctions. Instead, the Integrity Commissioner will impose the sanction (with a right of appeal); and
- Finally, the changes increased the number and severity of sanctions that may be imposed for violations of the Code of Conduct.

Proposed revised language for the Complaints Protocol is attached as Appendix A.

4.0 Communication/Implementation Plan

Once adopted, updates to the Code of Conduct will be communicated to all trustees and relevant staff and will be posted on the DDSB website.

5.0 Conclusion/Recommended Action

It is recommended that the Governance and Policy Committee approve the revisions to the Complaints Protocol as noted in Appendix A to ensure alignment with the new legislative framework which takes effect on January 1, 2025, and that the matter proceed to the Board of Trustees for consideration at its next meeting.

6.0 Appendices

Appendix A - Proposed Revised Complaints Protocol (clean copy)

Appendix B - Current Complaints Protocol

Appendix C - Current and Proposed Complaints Protocol Flowcharts

Report reviewed and submitted by:



Patrick Cotter, General Counsel

Appendix 2 – Complaints Protocol – Integrity Commissioner

1.0 RATIONALE

The Board has established a Board Member Code of Conduct (“Code of Conduct or “Code”) to govern the conduct of Trustees and to provide transparency, accountability, and public confidence in its governance. This Complaints Protocol supports the implementation of the Code of Conduct, particularly as related to the complaints process, including the reporting, investigation and resolution of complaints.

2.0 OBJECTIVE

To outline the processes for making, investigating, resolving and reporting on the outcomes of complaints made under the Code of Conduct.

3.0 DEFINITIONS

Terms are as defined in the Code of Conduct.

4.0 COMPLAINT PROTOCOL

This Complaint Protocol describes informal and formal ways for addressing allegations of breach of the Code of Conduct. The Complaint Protocol is intended to ensure that there is an opportunity to resolve complaints as fairly, expeditiously and meaningfully as possible.

4.1 Allegations of Breach made by Non-Members

- 4.1.1 A DDSB community member (i.e. DDSB staff member, a parent/guardian of a minor DDSB student, or a DDSB student that is at least 18 years of age) may bring forward an alleged breach of the Code of Conduct by submitting to the Integrity Commissioner a properly completed copy of an Inquiry Request Form located on the DDSB website.
- 4.1.2 All Inquiry Request Forms shall be completed and signed by an identifiable individual.
- 4.1.3 The Integrity Commissioner shall know the identity of the requestor but where the safety of the requestor is an issue, or the identity of the requestor could impact the functioning of the Board and/or professional working relationships, the Integrity Commissioner can maintain the anonymity of the requestor, provided that the Integrity Commissioner is satisfied that the failure to identify the requestor does not and will not have a material impact on the fairness of the process to the member(s) against whom the allegations are made. Further, where the identity of the requestor is not disclosed, Trustees may consider the fairness of the process to the member(s) against whom the allegations are made in considering the allegations.
- 4.1.4 All properly completed Requests for Inquiry shall be reviewed by the Integrity Commissioner. The review shall be undertaken as follows:

1. At the first stage, the Integrity Commissioner shall undertake a threshold assessment of the completed Inquiry Request Form to determine if it raises a timely and serious question regarding non-compliance with the Code of Conduct. If it does not, the Integrity Commissioner shall advise the requestor in writing of the determination and the matter shall be closed.
2. In the event that the Integrity Commissioner determines that the Request for Inquiry raises a timely and serious question regarding non-compliance with the Code of Conduct, then the Integrity Commissioner shall proceed to the second stage of the review. During this second stage of the review, the Integrity Commissioner may speak with the requestor and shall speak to the member about whom the allegations have been made. No further inquiry is to be made by the Integrity Commissioner at this stage.
3. If after the completion of stage two of the review, the Integrity Commissioner determines that the Request for Inquiry does not raise a timely and serious issue regarding non-compliance with the Code of Conduct, the Integrity Commissioner shall advise the requestor in writing of the determination and the matter shall be closed. The Integrity Commissioner, in consultation with the Chair of the Board, may report to the Board of Trustees that a specific Request for Inquiry has been closed but shall not disclose information that could identify the complainant.
4. If after the completion of stage two of the review, the Integrity Commissioner determines that the Request for Inquiry raises a serious issue regarding non-compliance with the Code of Conduct, the Integrity Commissioner shall report to the members during a closed-session meeting of the Committee of the Whole. The member against whom the allegations are made is entitled to be present. Any member may then choose whether to bring the matter forward in accordance with the standard process outlined in section 4.2 below. The Integrity Commissioner may advise the requestor of the status from time-to-time, as the Integrity Commissioner may deem appropriate.

4.2 Allegations of Breach Brought Forward by Members

- 4.2.1 A member who has reasonable grounds to believe that a member has breached the Code of Conduct may notify the following persons in writing of the alleged breach, together with any other notification that may be prescribed by regulation:
- i) The Director of Education and the vice-chair of the Board, if the notice relates to the conduct of the Chair of the Board;
 - ii) Another member of the Board who is neither the complainant nor the subject of the complaint, if the notice relates to the conduct of both the chair and vice-chair, with a copy to the Director of Education; and
 - iii) In all other situations, the Chair of the Board with a copy to the Director of Education.

- 4.2.2 Notice of an alleged breach of the Code of Conduct shall include,
- i) the name and contact information of the member alleging the breach;
 - ii) the name and contact information of the member whose conduct is the subject of the notification;
 - iii) the date of the alleged breach;
 - iv) a description of the alleged breach; and
 - v) the provision of the code of conduct that was allegedly breached.
- 4.2.3 If such a notification of an alleged breach is delivered, the person receiving the notice shall:
- i) immediately provide a copy of the written notice to the member whose conduct is the subject of the alleged breach and to the other members; and
 - ii) if the matter is not resolved within 20 business days after the member received the notice, or within such other time period as may be prescribed by regulation, refer the matter to the Integrity Commissioner for investigation.
 - iii) in attempting to resolve the matter within the 20-business day timeframe, the member(s) receiving the notice may request that the Director of Education retain an external professional to assist. The Director retains the discretion to hire external assistance and, if so, whom.

4.3 Integrity Commissioner Investigation

- 4.3.1 If the Integrity Commissioner receives a referral for investigation, the Integrity Commissioner shall commence an investigation no later than 14 days after receiving the referral or within such other time period as may be prescribed by regulation and shall provide the member with the opportunity to respond to the allegations, as well as a right of reply, where appropriate.
- 4.3.2 The integrity commissioner may refuse to commence an investigation into an alleged breach if:
- (a) the complaint was made more than 60 days after the day the alleged breach occurred or was discovered, whichever is later, unless the integrity commissioner is satisfied the delay was incurred in good faith and no substantial prejudice will result to any person affected by the delay; or
 - (b) in the opinion of the integrity commissioner, the complaint is made in bad faith or is frivolous or vexatious.
- 4.3.3 The Integrity Commissioner shall calculate the time periods based on the rules set out in the Education Act and any applicable regulations thereunder, including the rules on discoverability.
- 4.3.4 The integrity commissioner shall provide written notice of a refusal to commence an investigation to the member who is the subject of the complaint and to the board.

- 4.3.5 In conducting an investigation, the Integrity Commissioner may:
- i) require the production of any records that may in any way relate to the investigation;
 - ii) examine and copy any records required under clause; and
 - iii) require any officer of the board or any other person to appear before him or her and give evidence, on oath or affirmation, relating to the investigation.
- 4.3.6 The Integrity Commissioner shall make a determination with respect to a complaint of an alleged breach no later than 90 days after commencing the investigation, or within such other time period as may be prescribed by regulation, unless the Integrity Commissioner notifies the board and the member who is the subject of the complaint that an extension is necessary and of the reasons for the extension.

4.4 Sanctions

- 4.4.1 If the Integrity Commissioner determines, following an investigation, that the member has breached the Code of Conduct, the Integrity Commissioner may impose one or more of the following sanctions:
- i) Censure of the member.
 - ii) Requiring the board to reduce the member's honorarium by an amount not exceeding the prescribed amount, requiring the member to return any excess already paid to the member and authorizing the board to recover the excess from the member.
 - iii) Barring the member from attending all or part of one or more meetings of the board or one or more meetings of a committee of the board, for the period of time specified by the integrity commissioner up to a maximum of 90 days or the balance of the member's term of office, whichever is less.
 - iv) Barring the member from sitting on one or more committees of the board, for the period of time specified by the integrity commissioner, up to a maximum of 90 days or the balance of the member's term of office, whichever is less.
 - v) Barring the member from becoming the chair or vice-chair of the board or of any committee of the board, or removing the member from any of those positions.
 - vi) Barring the member from exercising the privileges of a board member or acting as a board representative, or removing the member from a position the member holds as a board representative.
 - vii) Subject to any other limits set out in paragraphs (i) to (vi) above, any other sanction that, in the opinion of the Integrity Commissioner, is reasonable and appropriate in the circumstances.
 - viii) Subject to any other limits set out in paragraphs (i) to (vi) above, any other sanction that, in the opinion of the Integrity Commissioner, would promote compliance with the Code of Conduct.

- 4.4.2 The imposition of a sanction that bars a member from attending all or part of one meeting of the board shall be deemed, for the purpose of clause 228 (1) (b) of the *Education Act*, to be authorization for the member to be absent from the meeting.
- 4.4.3 A member who is barred from attending all or part of a meeting of the board or a meeting of a committee of the board is not entitled to receive any materials that relate to that meeting or that part of the meeting and that are not available to members of the public.

4.5 Appeal

- 4.5.1 The Integrity Commissioner shall provide the member whose conduct was the subject of the complaint and the board written notice of a determination that the member has or has not breached the board's code of conduct and of any sanctions imposed. The written notice must include,
- i) the reasons for the determination;
 - ii) the reasons for any sanctions; and
 - iii) information about the right to appeal under section 218.3.2. of the Education Act.
- 4.5.2 If a sanction is varied or overturned on appeal under section 218.3.2 of the Education Act, that result shall be deemed to be effective as of the date that the original determination was made by the Integrity Commissioner.

4.6 Public Information

- 4.6.1 The Chair of Board shall ensure that the following records are maintained and published on the Board's website:
- i) A summary of any matter referred to an Integrity Commissioner for investigation (except those under section 4.1);
 - ii) A summary of the decision of the Integrity Commissioner to refuse to commence an investigation (except those under section 4.1);
 - iii) A summary of the determination of the Integrity Commissioner following investigation (except those under section 4.1)
 - iv) A determination of an appeal panel.
- 4.6.2 Where the alleged breach of the Code of Conduct or the determination regarding the breach involves any of the matters described in clauses 207 (2) (a) to (e) of the Education Act, the Board shall publish only such information as is appropriate.

Appendix 2 – Complaints Protocol – Integrity Commissioner

1.0 RATIONALE

The Board has established a Board Member Code of Conduct (“Code of Conduct or “Code”) to govern the conduct of Trustees and to provide transparency, accountability, and public confidence in its governance. This Complaints Protocol supports the implementation of the Code of Conduct, particularly as related to the complaints process, including the reporting, investigation and resolution of complaints.

2.0 OBJECTIVE

To outline the processes for making, investigating, resolving and reporting on the outcomes of complaints made under the Code of Conduct.

3.0 DEFINITIONS

Terms are as defined in the Code of Conduct.

4.0 COMPLAINT PROTOCOL

This Complaint Protocol describes informal and formal ways for members of the public, staff members and members of the Board of Trustees to address complaints concerning the Code of Conduct and members of the Board. The Complaint Protocol provides a number of ways to resolve complaints in addition to the process described in section 218.3(2) of the *Education Act*. Nothing in this Code of Conduct impacts the ability of a member to elect to bring a complaint directly to the Board of Trustees under section 218.3 of the *Education Act*, rather than to the Integrity Commissioner.

The Complaint Protocol is intended to ensure that there is an opportunity to resolve complaints as fairly, expeditiously and meaningfully as possible.

4.1 Informal Complaint Process

Individuals (including staff members of the Board, members of the public, or members of the Board) may elect to pursue an informal process to address conduct prohibited by the Code of Conduct. With the consent of the complainant and the Trustee, the Integrity Commissioner may be a part of any informal process.

Individuals (including staff members of the Board, members of the public, or Trustees) who have identified or witnessed conduct by a Trustee that they believe is in contravention of the Code of Conduct may wish to consider addressing the conduct in an informal way including one or more of the following:

- (a) advise the Trustee that the conduct contravenes the Code of Conduct with an explanation as to why;
- (b) encourage the Trustee to stop the prohibited conduct;
- (c) keep a written record of the incident(s) including dates, times, locations, other persons present, and any other relevant information; advise the Integrity Commissioner about the concerns related to the Trustee and any response of the Trustee;
- (d) if applicable, confirm to the Trustee the satisfaction with the response of the Trustee; or, if applicable, advise the Trustee of the dissatisfaction with the response;
- (e) speak to the Chair of the Board to see if the matter can be resolved;
- (f) if the parties agree, the Integrity Commissioner can participate in resolving or attempting to resolve the issues; and
- (g) consider the need to pursue a formal complaint under this Complaint Protocol.

Delay in making a formal or informal complaint to the Integrity Commissioner and any prejudice to the Trustee against whom the complaint is made as a result of such delay, shall be considered by the Integrity Commissioner and may, at the discretion of the Integrity Commission, be a sufficient basis for not proceeding with an investigation. In no case, shall a complaint be investigated if it is not made within 1 year of the events at issue.

The informal complaint process is encouraged; however, it is not required prior to beginning the formal complaint process.

Anonymous complaints will not be considered by the Integrity Commissioner, but the Integrity Commissioner has the discretion to hide the identity of a complainant where the safety of the complainant is an issue or where the disclosure could have a material impact on the functioning of the Board and/or professional working relationships within the Board.

If an informal complaint is brought to the attention of the Integrity Commissioner during the pre-election period described in subsection 4.2(f), the Integrity Commissioner shall not participate in the informal process until after a new Board is deemed organized under section 6 of the *Municipal Elections Act*.

4.2

Formal Complaint

Requests for Inquiries

- (a) A request for an inquiry into a complaint that a Trustee has contravened the Code of Conduct (the “Formal Complaint”) may be made to the Integrity Commissioner and if so, shall be made in writing on the prescribed form.
- (b) All written complaints shall be signed by an identifiable individual.
- (c) The Integrity Commissioner shall know the identity of the complainant but where the safety of the complainant is an issue, or the identity of the complainant could impact the functioning of the Board and/or professional working relationships, the Integrity Commissioner can maintain the anonymity of the complainant, provided that the Integrity Commissioner is satisfied that the failure to identify the complainant does not and will not have a material impact on the fairness of the process to the member(s) against whom the allegations are made. Further, where the identity of the complainant is not disclosed to the Board of Trustees, the Board of Trustees may consider the fairness of the process to the member(s) against whom the allegations are made in considering the alleged breach and any sanction.
- (d) A Formal Complaint shall set out reasonable and probable grounds for the allegation(s) that a Trustee has contravened the Code of Conduct. The complaint should include the name of the alleged violator, the provision allegedly contravened, the facts constituting the alleged contravention, the names and contact information of witnesses, and contact information for the complainant during regular business hours.
- (e) Where a complaint is brought forward by way of a Board decision under s. 218.3(a) of the *Education Act*, it may be referred to the Integrity Commissioner and, in that case, the Board shall direct whether the Integrity Commissioner is to treat the matter as a Formal Complaint or pursue informal inquiry and potential resolution. In any such matter where the Board has directed the Integrity Commissioner to pursue an informal inquiry and potential resolution, the Integrity Commissioner shall advise the Board in the event that the Integrity Commissioner has determined that the informal process is not likely to resolve the matter. Upon receipt of such advice, the Board may then direct that the Integrity Commissioner to treat the matter as if it were a Formal Complaint; otherwise, the Board shall make inquiries into the matter and shall, based on the results of the inquiries, determine whether the member has breached this Code of Conduct and, if so, it shall consider whether to sanction the

member under section 218.3(3) of the *Education Act*.

- (f) In a municipal election year, a Code of Conduct complaint respecting a Trustee who is seeking re-election will not be received by the Integrity Commissioner and any open complaint investigation shall be suspended during the period starting on Civic Monday and ending when a new Board is deemed organized under section 6 of the *Municipal Elections Act*.

4.3 Classification of Complaints by the Integrity Commissioner

- (a) An original written Formal Complaint shall be filed with the Integrity Commissioner for initial classification to determine if the matter is a complaint with respect to non-compliance with the Code of Conduct or whether it is covered by other legislation or other policies.
- (b) If the complaint is not a complaint with respect to non-compliance with the Code of Conduct or the complaint is covered by other legislation, the Integrity Commissioner shall advise the complainant in writing as follows:
- I. if the complaint is an allegation of a criminal nature consistent with the *Criminal Code of Canada*, the complainant shall be advised that if the complainant wishes to pursue any such allegation, the complainant must pursue it with the appropriate police force;
 - II. if the complaint is with respect to non-compliance with the *Municipal Conflict of Interest Act*, the complainant shall be advised to review the matter with the complainant's own legal counsel;
 - III. if the complaint is with respect to non-compliance with the *Municipal Freedom of Information and Protection of Privacy Act*, the complainant shall be referred to the Board's General Counsel;
 - IV. in other cases, the complainant shall be advised that the matter, or part of the matter, is not within the jurisdiction of the Integrity Commissioner to consider, with any additional reasons and referrals as the Integrity Commissioner considers appropriate.
- (c) The Integrity Commissioner shall undertake a threshold assessment of any Formal Complaint and shall determine whether the complaint is outside the timelines stipulated herein or is frivolous, vexatious, or not made in good faith, or whether there are no grounds or insufficient grounds for an investigation, in which case the Integrity Commissioner shall not initiate an investigation, or, where that becomes apparent in the course of an investigation the Integrity

Commissioner shall terminate the investigation. The complainant and Trustee, as appropriate, shall be advised of the decision with a rationale. Where the complainant breaches the integrity of an investigation by sharing the details on social media, or in the public arena, the Integrity Commissioner may terminate the investigation.

In assessing whether a complaint is frivolous, vexatious, or not made in good faith, the Integrity Commissioner shall consider whether the complainant is advancing a concern, issue or complaint that is consistent with the purpose of the Code of Conduct and also whether the complaint is, in essence, in the nature of a private interest.

4.4 Reports from the Integrity Commissioner: No Jurisdiction or Inquiry

- (a) The Integrity Commissioner may report to the Board of Trustees that a specific complaint is not within the jurisdiction of the Integrity Commissioner, but shall not disclose information that could identify the complainant.
- (b) The Integrity Commissioner shall report annually to the Board of Trustees on complaints not within the jurisdiction of the Integrity Commissioner, but shall not disclose information that could identify a person concerned.
- (c) Other than in exceptional circumstances, the Integrity Commissioner will not report to the Board of Trustees on any complaint described in subsections 4.3(b) and (c) except as part of an annual report.

4.5 Formal Complaint Inquiries by the Integrity Commissioner

- (a) If a complaint has been classified as being within the Integrity Commissioner's jurisdiction, the Integrity Commissioner shall proceed with an investigation as follows:
 - I. provide the complaint and supporting material to the Trustee whose conduct is in question with a request that a written response to the allegation be provided within ten days; and
 - II. Provide a copy of the response to the complainant with a request for a written reply within ten days.
- (b) If necessary, after reviewing the written materials, delivered under subsection 4.5 (a) the Integrity Commissioner may speak to anyone he or she deems relevant to the complaint, access and examine any of the information, documents or electronic materials and may enter any Board work location relevant to the complaint for the purposes of investigation and/or settlement, provided that the Board's General Counsel has pre-approved the release of any information, documents or materials to the Integrity Commission in accord with the Board's legal obligations.

- (c) The inquiry will be conducted in private and will remain confidential, save and except as may be disclosed in any report by the Integrity Commissioner to the Board of Trustees or as necessary for the conduct of the investigation.
- (d) The Formal Inquiry may involve both written and/or oral statements by any witnesses, persons with relevant information to the complaint, the complainant or the Trustee alleged to have breached the Code.
- (e) The Statutory Powers Procedure Act does not apply.
- (f) Subject to the provisions of 4.5(g), at any time following receipt and review of a Formal Complaint or at any time during the Formal Inquiry, where the Integrity Commissioner believes there is an opportunity to successfully resolve the matter without a formal investigation, and both the complainant and the Trustee alleged to have breached the Code agree, an informal resolution may be pursued. If this process leads to a result that is satisfactory to the Complainant and the Trustee alleged to have breached the Code, then the complaint shall be deemed withdrawn.
- (g) Section 4.5(f) shall not be engaged unless the parties consent and unless the Integrity Commissioner is of the view that it is unlikely, on a balance of probabilities, that there would be a finding of a breach of the Code of Conduct.
- (h) A Formal Complaint may be withdrawn by the Complainant at any time prior to the Board making a determination on the alleged breach(es) under section 218.3 of the *Education Act*.

4.6 Reports to the Board of Trustees

- (a) The Integrity Commissioner shall report to the complainant and the Trustee generally no later than 90 days after the receipt of the Formal Complaint unless the Integrity Commissioner determines that a longer period of time is required to complete the final report and the reason is explained in the final report. The Board of Trustees and the complainant shall be advised of the need for the extension of time with an expected date of delivery of the report.
- (b) The Integrity Commissioner may make interim reports to the Board of Trustees where necessary and to report on any instances of interference, obstruction or retaliation encountered during an investigation.
- (c) Where a Formal Complaint is sustained in whole or in part, the Integrity Commissioner shall report to the Board of Trustees outlining the findings of the investigation. The report shall make recommendations as to sanction with reference to section 218.3 of the *Education Act* together with any relevant decisions of other Boards that the Integrity Commissioner believes may be of assistance to the Board in considering sanction.
- (d) A report following an investigation into of a Formal Complaint will be delivered to the Board of Trustees for consideration in

accordance with the provisions of sections 218.3 and 207 of the *Education Act*. Where the Integrity Commissioner's investigation into a Formal Complaint concludes that there has been no breach of the Code of Conduct, the Integrity Commissioner's investigative report shall not be delivered to the Board of Trustees, but a summary of the investigation shall be provided to the Board of Trustees.

- (e) Where the Integrity Commissioner determines that a contravention of Code of Conduct occurred although the Trustee took all reasonable measures to prevent it, or that a contravention occurred through inadvertence or an error of judgment made in good faith, the Integrity Commissioner shall so state in the report.
- (f) The Integrity Commissioner shall give a copy of the report to the complainant and the Trustee whose conduct is concerned.
- (g) The Integrity Commissioner shall bring the report before the next available meeting of the Board of Trustees.
- (h) The Board of Trustees shall consider and make a decision in response to the Integrity Commissioner's report in a timely manner, and shall comply with the provisions of section 218.3 of the *Education Act* in considering and making a determination as to whether a breach has occurred and, if so, any sanction.
- (i) The Board of Trustees shall consider the report of the Integrity Commissioner and the Board of Trustees shall make its own assessment and determination of whether there has been a breach of the Code of Conduct and, if so, may accept, reject or amend the Integrity Commissioner's recommendation, if any, as to sanction.
- (j) The Integrity Commissioner may attend at the meeting at which the Board of Trustees will be considering the final report to answer questions of members of the Board of Trustees.
- (k) Where a matter is being handled by the Integrity Commissioner, individual Trustees shall not undertake their own investigation of any matter, including questioning a complainant, the Trustee who is alleged to have breached the Code or any witnesses or persons participating in any investigation.

4.7 Payment of Costs

- (a) Subject to subsection 4.7(e), a member of the Board who is a respondent to a formal complaint under this procedure shall be reimbursed by the Board for actual and reasonable legal and related expenses up to a maximum of \$5,000.
- (b) Subject to subsection 4.7(e), in the case of an application under the *Judicial Review Procedure Act* for judicial review of actions taken on a

complaint against a member of the Board by the Integrity Commissioner,

- I. where a member of the Board made the judicial review application, the member is eligible for reimbursement of legal costs, including additional legal costs in a successful application, that are not recovered by any costs awarded by the court, up to a maximum of \$20,000.
 - II. a member of the Board is entitled to reimbursement of the legal costs of intervention in a judicial review application where the member's interests are at stake, up to a maximum of \$20,000.
- (c) Subject to subsection 4.7(e), the Board of Trustees may consider the reimbursement of costs above the limit in subsections 4.7(b)(i) and (ii) on a case-by-case basis.
- (d) The Board may consider an advance payment to a Trustee for legal expenses prior to completion of an investigation for a maximum amount of \$5,000. While the Trustee must return to the Board all unused funds upon completion of an investigation, the Trustee will not be required to reimburse the spent funds if, upon completion of the investigation, either subsection 4.8(e)i or ii, apply. Otherwise, all advanced funds must be returned to the Board immediately upon conclusion of the investigation.
- (e) Costs shall only be reimbursed under this section to the member of the Board:
 - I. if the Integrity Commissioner concludes that there has been no contravention of the Code of Conduct by the member or that the member is not blameworthy, and the Integrity Commissioner's conclusion is not overturned on judicial review; or
 - II. if the member is successful, in whole or in part, on any judicial review application either as an applicant or intervenor.
- (f) Any request for costs under subsection 4.7 shall be made in writing to the General Counsel who shall report to the Board of Trustees.

4.8 Confidentiality and Formal Complaints

A Formal Complaint will be processed as follows:

- (a) The Integrity Commissioner and every person acting under the Integrity Commissioner's instructions shall preserve confidentiality with respect to all Code of Conduct matters except as required by law or in accordance with the provisions of the Code of Conduct and the *Education Act*. The following persons involved in any aspect of a Code

of Conduct complaint, including any investigation, shall preserve confidentiality:

- i. the complainant;
- ii. individual Trustees;
- iii. witnesses;
- iv. the Integrity Commissioner, and
- v. staff.

Except that the Integrity Commissioner may disclose relevant information in a public report but only to the extent that the Integrity Commissioner deems it appropriate to do so and provided same has been pre-approved by the Board's General Counsel as being in accord with the Board's legal obligations.

- (b) All reports from the Integrity Commissioner to the Board of Trustees will be made available to the public. The report may be redacted appropriately to reflect the requirements of section 207(2) of the *Education Act*.
- (c) Any references by the Integrity Commissioner in an annual or other periodic report shall not disclose confidential information that could identify the Trustee concerned, except where the Trustee's name has been disclosed in the public sphere, or the Integrity Commissioner deems it necessary to identify the person concerned.
- (d) The Integrity Commissioner, in a report to the Board of Trustees on whether a member of the Board has violated the Code of Conduct, shall only disclose such matters as in the Integrity Commissioner's opinion are appropriate for the purposes of the report.

5.0 EVALUATION

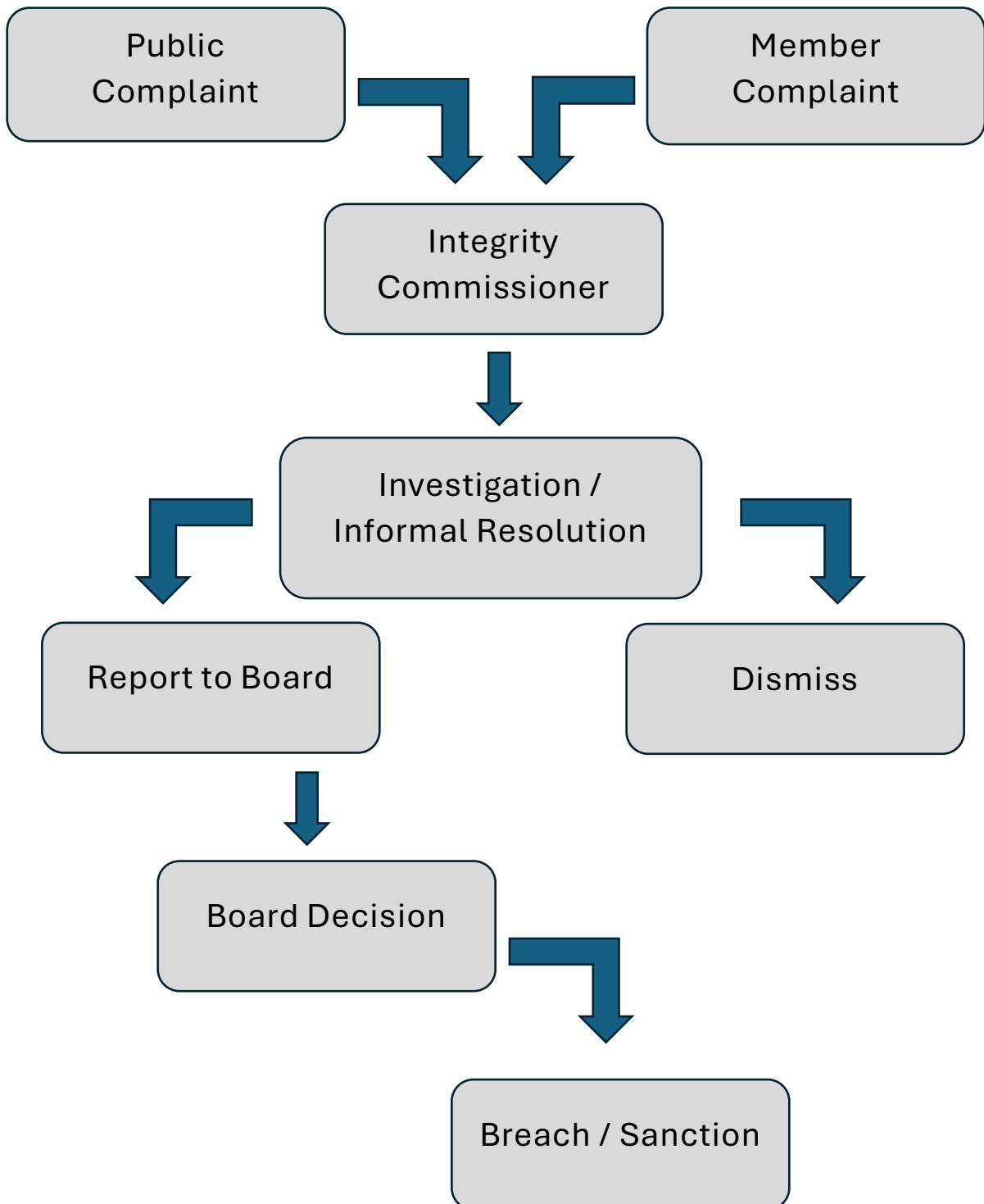
This code of Conduct is to be reviewed and updated as required but at a minimum every four (4) years.

6.0 APPENDICES

Appendix A: Complaint Form

Summary: Current and Proposed
Integrity Commissioner Complaint Protocol

Flowchart 1: Current Process



Summary: Current and Proposed
Integrity Commissioner Complaint Protocol

Flowchart 2: Proposed Process

