

# Process re Anti-Harassment and Anti-Discrimination Policy

## Retaliation

No hardship, loss, benefit or penalty may be imposed in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Lodging a bona fide complaint will in no way be used against anyone or have an adverse impact on an individual's employment status. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Any person who is found to have violated this aspect of the policy will be subject to discipline up to and including termination of membership/employment.

## Confidentiality

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The President or Executive Director will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in strictest confidence.

## Complaint procedure

SSC has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. SSC will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. Complaints must be submitted to SSC as soon as possible after an incident has occurred, preferably in writing. An electronic form will normally be used to gather information relevant to the complaint.
2. Upon receiving a complaint or being advised that violation of this policy may be occurring, the President and/or Executive Director (and subject to conflict-of-interest and confidentiality policies) will initiate a preliminary investigation to ensure completeness of information provided and to determine whether there is *any* reasonable basis for believing that the alleged violation of this policy occurred.
3. Given *any* reasonable basis for believing the alleged violation of the policy may have occurred, the complaint will be referred to a firm with expertise in such investigations, said firm to interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
4. Upon conclusion of the firm's investigation, a written report will be provided to a closed session of the SSC Board. If it is determined that a violation of this policy has occurred, the report will recommend appropriate disciplinary action. The appropriate action will depend on the following factors:

- a) the severity, frequency and pervasiveness of the conduct;
- b) prior complaints made by the complainant;
- c) prior complaints made against the respondent; and
- d) the quality of the evidence (e.g., firsthand knowledge, credible corroboration).

If the investigation is inconclusive or if it is determined that there has been no violation of policy but potentially problematic conduct may have occurred, appropriate preventive action may be recommended.

5. The SSC Board will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation, seek legal advice as appropriate, and decide what action, if any, will be taken.
6. Once a final decision is made, the President and/or Executive Director will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

#### Alternative legal remedies

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through local, provincial, or federal agencies or the courts.