


<b>POLICY TITLE:</b> GOVERNANCE SYSTEMS PROFESSIONAL (GSP) CODE OF ETHICS CONCERN OR COMPLAINT PROCESS		<b>POLICY SECTION:</b> 13 GOVERNANCE SYSTEMS PROFESSIONAL (GSP)	<b>POLICY NO:</b> 13.3
<b>ORIGINATOR OF POLICY:</b> Professional Education Team	<b>APPROVED BY:</b> CEO	<b>REVIEW FREQUENCY:</b>	
<b>DATE APPROVED:</b> March 13, 2020	<b>LAST DATE REVIEWED/REVISED:</b>	<b>CEO SIGNATURE:</b> 	

### **POLICY PURPOSE:**

This policy is designed to outline the concern or complaints process as it relates to GSP Fellow Affiliates for GOVERN for IMPACT and their conduct related to the code of ethics.

### **THE POLICY:**

#### **WHO CAN SUBMIT A CONCERN OR COMPLAINT?**

1. Any Govern for Impact affiliate, client of a person who uses the Governance Systems Professional (GSP) designation, or other person or organization affected by the circumstances leading to a concern or complaint.

#### **HOW TO SUBMIT A CONCERN OR COMPLAINT**

2. Use the “Form to Register a Concern Related to the GSP Code of Ethics” to submit the concern or complaint. The form is available on the Govern for Impact website.
3. The person registering a concern or complaint will be asked to:
  - a. Provide their name and contact information;
  - b. Identify which clause of the Code of Ethics is the basis of the concern or complaint; and
  - c. Provide a detailed description of circumstances leading to the submission of the concern or complaint, including the events, timelines, and any action taken to rectify the situation.
4. The online form will be logged and an auto response will confirm receipt of the submitted form.
5. The “Form to Register a Concern or Complaint Related to the GSP Code of Ethics” as well as the web page where the form is located will include a notification that submission of false or invalid concerns or complaints will be treated as a breach of ethics.

#### **CONTACTING THE SUBJECT OF THE CONCERN OR COMPLAINT**

6. The CEO of Govern for Impact will officially log the registered concern/complaint, respond directly to the person filing the form to acknowledge the submitted concern/complaint and explain the process, timeline and immediate next steps. Only concerns/complaints substantiated by fact will be officially logged.

7. The CEO will contact the person who is the subject of the concern/complaint, provide them with the documented concern/complaint and explain the process, timeline, and immediate next steps. The CEO will ask the subject of the concern/complaint to submit a document describing their perspective of the circumstances or events under examination.
8. The CEO will offer the person filing the concern/complaint and the subject of the concern/complaint the option of resolving the concern/complaint informally prior to proceeding with the formal investigation. If the concern is resolved informally, a record of the resolution will be documented and logged by the CEO.

#### **REVIEWING, INVESTIGATED AND ADJUDICATING THE SUBMITTED CONCERN OR COMPLAINT**

9. The CEO will forward to the Policy Governance Professional Education Team (PG-PET) the registered concern/complaint along with the subject's explanation. The CEO will not disclose the name of the person who has registered the concern/complaint to the PG-PET.
10. The PGPET will review the concern/complaint and the response. It will determine if there is sufficient cause for the concern/complaint to proceed. If there is sufficient cause, the PG-PET will decide if further information is required. If this is the case, the CEO will appoint an investigator and determine the timeframe for completing the investigation.
11. The CEO will inform the complainant and the subject of the results of the PG-PET's review of the concern/complaint, the next steps, and the timeline to complete them.

#### **ACTIONS**

12. Once any further information has been collected, the CEO will direct the PG-PET to adjudicate the registered concern/complaint, prepare a report which presents its findings and recommended action, and submit the report to the CEO. The CEO will determine the deadline for completing the report.
  - a. If the registered concern/complaint merits action, the PG-PET will determine whether a warning, loss of use of the GSP designation for a time-limited or indeterminate period of time, and/or requirement for education is warranted. The PG-PET will submit to the CEO an initial report with its recommended action. After the CEO review, the PG-PET will finalize its decision for the CEO to enact.
  - b. No refund of registration will be made in the event that use of the designation is suspended or terminated.
13. The CEO will inform the subject and the person who registered the concern/complaint of the outcome of the process, along with the implications of the decision. If the subject is found to have breached the Code of Ethics, the CEO will advise the subject and the person who registered the concern/complaint that any retaliation against the person who registered the concern/complaint will be seen as a further breach of the Code of Ethics.

14. Anyone who is subject to an action as a result of the formal investigation and adjudication process may appeal the decision.
  - a. An appeal can be submitted to the CEO on the basis of any of the following:
    - i. Material facts or circumstances were overlooked by the investigation or in the rationale for the decision;
    - ii. The adjudication of the concern/complaint did not consider all of the available facts or evidence; and/or
    - iii. The documented process was not followed.
  - b. The appeal will be conducted by a panel of three persons randomly selected from among members of the Strategic Leadership Team. The decision of the appeal panel is final.
15. Govern reserves the right to revoke the GSP designation in the event of egregious action or criminal conviction.
16. Anyone who has lost the use of the designation for an indeterminate period of time may apply for reinstatement two years after decision.

**CONFIDENTIALITY**

17. The CEO will ensure that all documents relating to the concern/complaint are retained in confidential files accessible only to the CEO.

## CONCERNS/COMPLAINTS PROCESS

