

Section: PROCESSES AND PROCEDURES	Policy Number:	D-P6
Policy: Raising Conduct and Ethics Concerns	Total Pages:	1 of 3
	Date Approved:	2024/06/26
Policy Attachment(s): N/A	Date to be Reviewed:	2025/09/24

OVERVIEW

The Community Services Coordination Network (CSCN) is committed to a working environment of high ethical standards and accountability. Internal controls and operating policies and procedures are intended to prevent, deter, detect, identify, and address unethical activities. However, at times these controls and procedures are not sufficient safeguards. A policy for raising conduct and ethics concerns provides another safeguarding mechanism and provides a process for reporting questionable conduct.

POLICY

CSCN encourages individuals to come forward with information on illegal practices, professional misconduct/incompetence, violations of organizational policies, and unethical behaviour. CSCN will not retaliate against, nor will it abide by any individual in the organization retaliating against individuals who make good-faith reports. Confidentiality of those making reports is of utmost concern to CSCN and, as such, will be protected to the greatest extent possible (except where required by law).

ROLES AND PROCEDURES

It is the responsibility of everyone in the Organization to comply with legislation, organizational policy/procedure, and conduct themselves ethically in fulfillment of their duties. It is also the responsibility of everyone in the Organization to report concerns that arise including:

- Unlawful acts, whether civil or criminal;
- Theft, embezzlement, bribery, or fraud;
- Dangerous practices likely to cause harm or damage to any person, property, or the environment;
- Unprofessional conduct or business/professional practices;
- Conflicts-of-interest;
- Violations of policy or procedure or any regulations that govern CSCN operations; or
- Failure to comply with, or efforts to circumvent CSCN internal compliance policies or controls.

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ROLES AND PROCEDURES CONTINUED -

CSCN is responsible for fully investigating all reports related to conduct and ethical concerns.

To fulfill this mandate, CSCN’s Board of Directors has designated the Chief Executive Officer (CEO) to act as the Compliance Officer in receiving and investigating reports. The exception to this is if the report includes the CEO in the allegations, in which case the Board Chair will receive and direct the investigation of the report.

Prior to initiating a report, individuals should refer to and consider using CSCN’s complaint policies. The Complaint and Raising Conduct and Ethics Concerns Policies and Processes are not for emergency situations which should be reported immediately to a supervisor or the CEO. If none of the aforementioned Policies/approaches are deemed appropriate by the individual, or if the individual is unable to navigate those processes, then the Raising Conduct and Ethics Concerns Policy and Process should be used.

An email can be sent that includes a written report, or to request a meeting to provide an in- person report.

- Emails should be sent to the CEO;
- If the report includes concerns about the CEO, the email should be sent to the Board Chair at complaints@cscn.on.ca.

Any individual filing a report should be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the above noted concerns . Any reports that ultimately prove to be unsubstantiated, and to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense, and may be referred to legal authorities if it is deemed that it may constitute a criminal offence.

If contact information is provided with the report, the Compliance Officer (or Board Chair) will acknowledge receipt of the report within ten business days.

The Compliance Officer (or Board Chair) is responsible for investigating and resolving all reported complaints and advising the Board of Directors of the report and investigation.

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No person who in good faith files a complaint shall suffer any reprisals, retaliation, or adverse consequences as a result of doing so. Any individual who retaliates against someone who has reported a suspected violation in good faith is subject to discipline, up to and including dismissal.

Confidentiality will be maintained to the greatest extent possible. The limits of confidentiality, and potential consequences (i.e., ability to investigate and address concerns while maintaining confidentiality may be an issue depending on circumstances) will be discussed with anyone making a report before an investigation is initiated. All persons will:

- Keep information relating to any process under this policy strictly confidential;
- Refrain from discussing any reports or the fact of their involvement, except to the extent required for the purposes of investigation and resolution.

This policy will be available to all staff and posted on the CSCN public-facing website.