

## ONTARIO SENIORS' FORUM

## CD~001

# COMPLAINTS, DISCIPLINE AND APPEALS POLICY

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*Fairness • Accountability • Proportionate Resolution • Procedural Integrity*

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| <b>Policy Number</b>                 | CD-001                                    |
| <b>Classification</b>                | OSF Governance Policy                     |
| <b>Version</b>                       | 1.0                                       |
| <b>Effective Date</b>                | _____, 2026                               |
| <b>Approved By</b>                   | Provincial Board of Directors             |
| <b>Bylaw Authority</b>               | Articles 14, 15, 16 and 17, as applicable |
| <b>Policy Owner</b>                  | Provincial Board                          |
| <b>Administrative Responsibility</b> | Executive Director / Secretary            |
| <b>Review</b>                        | At least every three years or as required |

## 1. PURPOSE

This Policy establishes a fair, consistent and proportionate framework for receiving and resolving complaints, addressing alleged misconduct, imposing discipline where justified, and providing review or appeal where required. It is intended to protect members' rights, organizational integrity, procedural fairness and the reputation of OSF.

## 2. AUTHORITY AND APPLICATION

This Policy is adopted as an OSF Governance Policy under the Bylaws and applies to Provincial and Regional Chapter matters where OSF has authority. It supplements, and does not replace, any mandatory process in applicable law, the Articles, Constitution or Bylaws.

## 3. SCOPE

- members and Provisional Members;
- Provincial Directors and Officers;
- Regional Chapter Directors and Officers;
- committee and working-group members;
- volunteers and other persons acting under OSF authority, to the extent applicable;
- complaints concerning conduct at OSF programs, meetings, events, communications or organizational activities.

## PART I — PRINCIPLES AND DEFINITIONS

### 4. GUIDING PRINCIPLES

- procedural fairness and impartiality;
- timely and proportionate resolution;
- confidentiality to the extent reasonably possible;
- opportunity to know and respond to material allegations;
- freedom from retaliation for good-faith participation;
- appropriate documentation and records;
- informal resolution where suitable, without compromising safety or serious governance concerns;
- separation of investigation, recommendation and appeal functions where reasonably practicable.

### 5. DEFINITIONS

Complaint means a written or recorded concern alleging conduct, action or omission that may breach the Bylaws, Governance Policies, Code of Conduct, Chapter requirements or other applicable OSF standards. Discipline means a corrective or disciplinary measure imposed through an authorized process. Respondent means the person whose conduct is the subject of a complaint.

### 6. MATTERS OUTSIDE THIS POLICY

Routine service concerns, ordinary disagreements, policy debates, employment matters governed by a separate employment process, and matters outside OSF authority may be redirected to the appropriate process. Criminal, safety or legal matters may be referred to appropriate authorities where required or reasonably necessary.

## PART II — MAKING AND RECEIVING A COMPLAINT

### 7. WHO MAY COMPLAIN

A member, volunteer, Director, Officer, participant or other person directly affected by an OSF matter may submit a complaint. The Provincial Board may also initiate a review where credible information indicates serious misconduct or organizational risk.

### 8. FORM OF COMPLAINT

Complaints should normally be submitted in writing and should identify the conduct complained of, relevant dates or circumstances, persons involved, available supporting information and the outcome sought. Reasonable assistance may be provided where a complainant has difficulty submitting a written complaint.

### 9. WHERE TO SUBMIT

A Chapter-level complaint should normally be submitted to the Chapter President or Secretary. A complaint involving the Chapter President, multiple Chapter Directors, a serious governance issue, or a matter that cannot be handled impartially at Chapter level shall be referred to the Provincial Office. Provincial matters should be submitted to the Executive Director, Secretary or other person designated by the Provincial Board.

### 10. CONFLICTS IN COMPLAINT HANDLING

A person who is the complainant, respondent, material witness, close associate of a party, or otherwise conflicted shall not control the investigation or final decision. COI-001 applies.

### 11. ACKNOWLEDGEMENT AND PRELIMINARY ASSESSMENT

The receiving authority should acknowledge the complaint within a reasonable time and conduct a preliminary assessment to determine jurisdiction, seriousness, immediate risks, whether further information is required and the appropriate resolution pathway.

### 12. EARLY OR INFORMAL RESOLUTION

Where appropriate and voluntarily accepted, a matter may be addressed through clarification, apology, facilitated discussion, mediation, coaching or another informal measure. Informal resolution is not required for serious allegations, repeated misconduct, financial irregularity, harassment, violence, retaliation or matters requiring formal governance action.

## PART III — FORMAL REVIEW AND INVESTIGATION

### 13. NOTICE TO RESPONDENT

Where a formal review proceeds, the respondent shall receive sufficient notice of the material allegations and a reasonable opportunity to respond before an adverse finding is made, subject to lawful confidentiality and safety limitations.

## 14. INVESTIGATOR OR REVIEWER

The appropriate Board or authorized officer may appoint an impartial reviewer or investigator. For serious, complex or sensitive matters, an external investigator or advisor may be used where resources permit.

## 15. INVESTIGATION PROCESS

- a. review relevant documents and records;
- b. interview the complainant, respondent and relevant witnesses where appropriate;
- c. provide the respondent a fair opportunity to answer material allegations;
- d. consider reliability, consistency and available corroborating information;
- e. maintain appropriate confidentiality;
- f. prepare findings or recommendations proportionate to the matter.

## 16. STANDARD FOR ADMINISTRATIVE FINDINGS

Unless a different legal standard applies, an administrative finding under this Policy should be based on whether the available information shows that it is more likely than not that the alleged conduct occurred.

## 17. INTERIM MEASURES

Where reasonably necessary to protect safety, records, finances, participants or the integrity of a process, an authorized body may impose temporary non-disciplinary measures, such as limiting access to records, changing duties, pausing signing authority or restricting participation in a particular activity. Interim measures are not a finding of misconduct and should be reviewed promptly.

# PART IV — DECISIONS AND DISCIPLINE

## 18. DECISION-MAKING AUTHORITY

The authority to impose discipline shall be determined by the Bylaws and applicable Governance Policies. A Regional Chapter shall not impose a sanction reserved to the Provincial Board. Membership suspension or termination must follow the authority and procedural requirements established by the Bylaws.

## 19. POSSIBLE OUTCOMES

- no further action;
- guidance, education or coaching;
- informal or formal warning;
- apology, corrective undertaking or restoration of records/property;
- removal from a committee, assignment or volunteer role where authorized;
- restriction of specified privileges or activities where authorized;
- recommendation concerning office or leadership responsibilities;
- suspension or termination of membership where authorized by the Bylaws;
- referral to another appropriate process or authority.

## 20. PROPORTIONALITY

In selecting an outcome, the decision-maker should consider seriousness, intent, impact, prior relevant conduct, acknowledgement of responsibility, corrective steps, risk of recurrence, consistency with similar cases and the interests of OSF and affected persons.

## 21. WRITTEN DECISION

A formal disciplinary decision should be documented and communicated to the affected person. The notice should identify the outcome, effective date, any conditions, and any available review or appeal process. Reasons should be sufficient to support procedural fairness without unnecessarily disclosing confidential information.

## PART V — REVIEW, APPEAL AND MEDIATION

### 22. RIGHT OF REVIEW OR APPEAL

Where the Bylaws or this Policy provide an appeal or review, the affected person may submit a written request within fourteen (14) calendar days after receiving the decision, unless a different period is required by the Bylaws or stated in the decision notice.

### 23. GROUNDS

- a material procedural error;
- a material factual error or significant new information that could not reasonably have been provided earlier;
- a conflict of interest or reasonable apprehension of bias;
- a sanction that is clearly disproportionate;
- a decision outside the authority of the original decision-maker.

### 24. APPEAL BODY

An appeal shall be considered by a person or body with authority under the Bylaws that was not materially involved in the original decision. A conflicted person shall not participate.

### 25. APPEAL OUTCOMES

The appeal authority may confirm, vary or set aside the decision, return the matter for reconsideration, direct additional fact-finding, or substitute another outcome within its authority.

### 26. MEDIATION

Mediation may be offered where appropriate and all necessary parties voluntarily agree. Mediation is not suitable where it would compromise safety, statutory duties, serious governance accountability or the need for a formal determination.

## PART VI — CONFIDENTIALITY, RECORDS AND PROTECTION

### 27. CONFIDENTIALITY

Complaint information shall be shared only with persons who reasonably require it for resolution, investigation, decision-making, legal advice, safety, audit or governance oversight. Absolute confidentiality cannot be guaranteed.

## 28. RECORDS

Complaint, investigation, decision and appeal records shall be securely maintained under RMP-001 once adopted. Records relevant to pending legal, regulatory or governance proceedings shall not be destroyed.

## 29. NON-RETALIATION

Retaliation against a person for making a good-faith complaint, providing information, acting as a witness or participating in an authorized process is prohibited and may itself constitute misconduct.

## 30. BAD-FAITH COMPLAINTS

A complaint that is not substantiated is not, by itself, a bad-faith complaint. Knowingly false, malicious or deliberately abusive complaints may be addressed as misconduct.

## 31. SAFETY AND EXTERNAL REPORTING

Nothing in this Policy prevents OSF or an individual from contacting emergency services, law enforcement, a regulator, insurer, funder or other appropriate authority where required by law or reasonably necessary.

## 32. ACCESSIBILITY AND SUPPORT

Reasonable procedural accommodations should be provided to enable meaningful participation, consistent with privacy, fairness and available resources.

## 33. INTERPRETATION

This Policy shall be interpreted consistently with the Bylaws, GP-001, CC-001 and COI-001. Where another approved OSF process specifically governs the matter, that process may take precedence.

## 34. REVIEW AND AMENDMENT

The Provincial Board shall review this Policy at least every three years and may amend it by resolution.

## RELATED DOCUMENTS

- OSF Bylaws;
- GP-001 - Governance Policy Framework and Policy Register;
- CC-001 - Code of Conduct and Ethical Standards Policy;
- COI-001 - Conflict of Interest Policy;
- MP-001 - Membership Policy;
- RMP-001 - Records Management, Privacy and Information Security Policy;
- Governance Manual;
- Chapter Operations Manual;
- applicable complaint, incident and governance forms.

## POLICY APPROVAL

**Approved By**

Provincial Board of Directors, Ontario Seniors' Forum

|                    |                                           |
|--------------------|-------------------------------------------|
| Board Meeting Date | _____                                     |
| Resolution No.     | _____                                     |
| Effective Date     | _____                                     |
| Next Review        | Within three years or earlier as required |

#### REVISION HISTORY

| Version | Date       | Description    | Approved By      |
|---------|------------|----------------|------------------|
| 1.0     | _____ 2026 | Initial Policy | Provincial Board |