



Volunteer - Human Resources Policy Manual

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Habitat for Humanity Victoria (HFHV) is committed to developing, administering and aligning its policies with the BC Employment Standards Act, Human Rights Legislation and Habitat for Humanity Canada requirements. If any contradiction exists, the applicable Labour Code and/or Human Rights laws will supersede HFHV policy. Exceptions to these Human Resource Policies that do not interfere with any Legislation may be made at the discretion of the Executive Director in writing.

Adherence to policy at HFHV is a shared responsibility carried by the Executive Director, all supervisory staff and employees, and other Habitat representatives as applicable. Violation of HFHV policies may have disciplinary consequences up to and including termination of the worker involved.

The policies, procedures, or benefits contained within these documents do not constitute an employment contract and are subject to change at the discretion of HFHV. The posted electronic version will be deemed to be the accurate source should there be a discrepancy with a written manual.

These policies are binding on all HFHV employees and representatives, unless otherwise agreed to in their employment contract.

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Definitions in this policy:

“Direct Supervisor” is the:

- ReStore Manager for any ReStore representatives.
- Executive Director for the ReStore Manager and Affiliate office representatives.
- Board President for the Executive Director.

“HFHV” means Habitat for Humanity Victoria.

“Immediate Family” is defined as a spouse, common-law spouse, child, parent, guardian, sibling, grandchild or grandparent of the employee and any individual who lives with the employee as a member of the employee’s family.

“Related Party” includes immediate family members (and spouse or partner of any of these individuals) and extended family members (e.g. uncles, aunts, cousins).

“Representative” includes staff, consultants, contractors, board members and volunteers.

Policy Group: Human Resources	Sub Group: General Employment	
Policy Title: CODE OF CONDUCT	Number: HR 3.1	
Applies to: Representatives		
Date Approved: 21-Mar-16	Date Revised:	Next Review Date: 21-Mar-19

Intent and Rationale

It is expected that employees and representatives of HFHV will live up to the highest standards of conduct at all times. This policy has been developed to assist individuals in becoming and remaining aware of expected conduct at HFHV.

Policy

Although the various matters dealt with in this policy do not cover the full spectrum of activities, they are indicative of HFHV's commitment to maintaining high standards of conduct. They are to be considered descriptive of the type of behavior expected and are to be regarded as the minimum standards of performance required. All HFHV representatives are held accountable to maintain a level of professional conduct that will reflect positively on themselves and on HFHV including the below:

INTERPERSONAL

- Treat everyone with dignity and respect no matter their personal characteristics, background or values;
- Work cooperatively in a team;
- Refrain from behavior that could be considered demeaning, bullying, threatening or violent; and
- Refrain from engaging in any behavior that could be considered discrimination and harassment.

PROVIDING SERVICES

- Promote the mission and objectives of HFHV in all dealings with the public and within HFHV;
- Always act with fairness, honesty, integrity and openness;
- Maintain high standards of quality and productivity; and
- Provide a positive and valued experience for those receiving service.

PERSONAL ACCOUNTABILITY

- Act with honesty and integrity, and in accordance with any professional standards and/or governing laws and Legislation;
- Comply with any training or orientation provided;
- Have knowledge of HFHV's mission, values and current projects is mandatory for all staff;
- Properly care for HFHV equipment and property;
- Adhere to the policies and procedures of HFHV;
- Support the decisions and directions of the Board and Executive Director;
- Take responsibility for all actions and decisions; and
- Ensure that position authority is not exceeded;

CONFIDENTIALITY

- Respect and maintain the confidentiality of information accrued as a result of working at HFHV.

CONFLICT OF INTEREST

- All employees owe a duty of good faith and loyalty to HFHV. Accordingly, they should not engage in any outside activities that place or could place them in a position of conflict of interest. A signed 'Conflict of Interest Form' is required.

ALCOHOL/SUBSTANCE USE

Any individual reporting for duty while his/her ability to work is affected by alcohol, drugs or other substances will not be permitted to remain in the workplace and may be subject to disciplinary action. Employees experiencing difficulties in this area are encouraged to contact their benefit provider for assistance. The use, sale, possession, dispensation, purchase, transfer, manufacture or distribution of illegal substances or associated paraphernalia in the workplace, while performing HFHV business or during working hours is strictly prohibited. In addition, the use/misuse of prescription drugs or other medications (e.g. marijuana) that impair an individual's ability to safely and effectively perform his/her job duties is prohibited.

The use or possession of alcohol in the workplace, while performing services for HFHV, during working hours, or while representing HFHV (except at designated events as below), along with reporting to work under the influence of alcohol, is prohibited.

During HFHV sanctioned events alcohol may be served subject to the following:

- A HFHV designated supervisor will monitor the use and consumption of alcohol;
- Availability of alcohol will be limited and ample non-alcoholic beverages will be made available;
- All management present will set the example for responsible use and follow due process should abuse occur; and
- Designated drivers will be arranged.

Direct supervisors are responsible to apply judgment in assessing employees' or other HFHV representative's ability to safely and effectively perform any duties and, where reasonable suspicion of impairment exists, to take appropriate action. Such actions may include, but are not limited to: taking reasonable steps to ensure the individual can get home safely or obtaining emergency services.

POLICY VIOLATION

Whenever an employee believes that he/she may be in violation of this policy, he/she must discuss the situation with a supervisor. Any employee who knowingly fails to comply with this policy, its intent, or who knowingly permits a staff member under supervision to fail to comply with this policy, shall be considered to be in violation of his/her employment contract and will be subject to appropriate disciplinary action up to and possibly including termination and legal action.

Those who violate this policy also risk possible termination of volunteer involvement, a business relationship or visitor privileges.

Primary Responsibility for Policy Implementation

Executive Director, ReStore Manager

Policy Group: Human Resources	Sub Group: General Employment	
Policy Title: BULLYING, HARASSMENT AND VIOLENCE	Number: HR 3.2	
Applies to: Representatives		
Date Approved: 25-Apr-16	Date Revised:	Next Review Date: 25-Apr-19

Intent and Rationale

To define what workplace bullying, harassment and violence are and the steps to be taken if there is an occurrence. HFHV is committed to a healthy, welcoming and respectful workplace free from bullying, harassment and workplace violence.

Definitions

Review Officer:

The direct supervisor or a representative appointed by the direct supervisor.

Complainant:

An individual who has made an allegation of bullying, harassment or workplace violence.

Respondent:

An individual who is accused of bullying, harassment or workplace violence.

Bullying and Harassment:

Includes any inappropriate conduct or comment by a person towards an individual that the person knew or reasonably ought to have known would cause that individual to be humiliated or intimidated. Harassment may also relate to a form of discrimination that occurs when an individual is subjected to unwelcome verbal or physical conduct including, but not limited to, race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, disability, conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered, or any other lawfully protected status.

Sexual Harassment:

A form of harassment, generally defined in the following way:

- Any comments, conduct or surroundings of a sexual nature that is known, or should reasonably be known, to be unwelcome and causes an intimidating, hostile or uncomfortable work environment; or
- Conditions of a sexual nature placed on an employee that affect employment decisions.

Sexual harassment can be expressed in many ways, from very subtle to the most obvious, through any of the following:

- Suggestive remarks, sexual jokes or compromising invitations;
- Verbal abuse;
- Visual display of suggestive images;
- Leering or whistling;
- Patting, rubbing or other unwanted physical contact;
- Outright demands for sexual favours; and
- Physical assault.

Workplace Violence:

Any act in which a person is abused, threatened, intimidated or assaulted while representing HFHV, including:

- Threatening behaviour, defined as an expressed or implied threat to negatively impact an individual's health or safety, HFHV property, or any property where HFHV business is conducted which causes a reasonable apprehension or fear that harm or injury is about to occur;
- Verbal or written threats, and verbal abuse;
- An attempt to exercise, or the exercise of, physical force against a representative in the workplace, that causes or could cause physical injury to the representative; and
- Possession of weapons in the workplace. Weapons include handguns, rifles, replica/imitation firearms, pellet guns, starter pistols, ammunition, knives, ice picks, repellent sprays or any other item that does not have a lawful or proper purpose in the course of representing HFHV or is defined by law as a prohibited weapon.

What Bullying and Harassment is not:

- Any interpersonal conflicts, including differences in opinion, that is not related to the prohibited grounds covered in human rights legislation, unless it creates a poisoned work environment;
- Any reasonable action taken by a direct supervisor relating to the management and direction of employees, including constructive feedback, advice about work-related behaviour or disciplinary action; or
- Making a legitimate complaint about a representative's conduct.

Policy

Bullying, harassment or workplace violence (intentional or unintentional) of any kind will not be tolerated by HFHV. HFHV will respond appropriately to any situations that might arise in a prompt and effective manner. Direct supervisors are responsible, upon becoming aware that violent behavior, bullying or harassment is occurring, for taking appropriate corrective action, even if no formal complaint is made.

All Representatives in the workplace are obligated to protect the health and safety of themselves and others by not engaging in violence, bullying or harassment and reporting any violence, bullying or harassment they observe or experience.

Any Representative who engages in, or who allows or creates conditions that support, acts of workplace violence, bullying or harassment will be subject to corrective action, up to and including termination. HFHV will not tolerate any form of retaliation against an individual who reported workplace violence, bullying or harassment. Acts of retaliation must be immediately reported to a direct supervisor and will be promptly investigated and addressed. Any Representative found to have engaged in an act of retaliation will be subject to disciplinary action, up to and including termination.

Examples of behavior that will not be tolerated at HFHV:

- Yelling or raising voice in a threatening manner;
- Using threatening postures, statements, movements, or swearing;
- Throwing things, breaking things or hitting walls;
- Slapping, punching, pinching, kicking, choking or pulling hair;
- Physically restraining, holding or blocking another against their will;
- Using silent treatment or refusing to acknowledge others in the workplace; and
- Not complying with requests made that fit within the role filled at HFHV due to a conflict with the person making the request.

A representative may file a formal complaint at any federal or provincial authority independent of this policy.

Procedures

1. Representatives must report any workplace violence to their direct supervisor immediately. If bullying or harassment occurs, Representatives are encouraged to advise the alleged instigator, either verbally or in writing, in a reasonable and appropriate manner, that his/her behaviour is unwelcome and ask him/her to stop.
2. A written record of the incident including names, dates, times, specific behaviour and witnesses must be completed on an Incident Report.
3. Where the situation cannot be resolved or the situation continues, the Representative should discuss what happened with his/her direct supervisor as soon as possible and provide a copy of the Incident Report.

What to do if the direct supervisor is the cause of the complaint:

- If the ReStore Manager is the Respondent, report the situation to the Executive Director.
- If the Executive Director is the Respondent, report the situation to the Board President.
- If any member of the Board of Directors is the Respondent, the Executive Director would phone the WorkSafe BC prevention information line at 1 888 621-SAFE (7233).

INVESTIGATION PROCESS

1. The Review Officer will begin an investigation immediately upon receipt of the Incident Report. The investigation will be fair and impartial, providing both the Complainant and Respondent equal treatment in evaluating the allegations.
2. If the level of the complaint is of a serious enough nature, the Review Officer may require an alternate work environment for the Respondent, up to and including suspension and/or a restriction on entering the premises.
3. Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.
4. The investigation will include individual interviews with the parties involved and, where necessary, with individuals who observed the alleged conduct or may have other relevant knowledge. The Review Officer will also review any evidence, such as emails, handwritten notes, photographs, or physical evidence (e.g. vandalized objects).
5. Within ten (10) business days the Review Office will complete an Investigation Form. A copy will be sent to the direct supervisor (if applicable). The form will include the allegations, the responses, the findings and any recommendations. The Review Officer will share the findings with the Complainant and Respondent.

RECOMMENDATIONS

1. Where the Review Officer determines that the allegation is frivolous or otherwise without substantiation the inquiry will be closed. A copy of the Incident Report will be placed in the Complainant's personnel files.
2. If the Complainant and Respondent agree on what happened, the Review Officer will not investigate any further, and will determine what corrective action to take, if necessary.
3. If either the Complainant or Respondent is dissatisfied with the findings, he/she has the right to appeal the decision by submitting a written comment to the Review Officer's direct supervisor, who will investigate the matter further. The timeline for further investigation will be determined on a case by case basis.

CORRECTIVE ACTION

1. If it is determined that the complaint is substantiated, copies of the Incident Report and Investigation Form will be placed in the Respondent's file and corrective action will be required. Corrective action may include:
 - Apologies;
 - A written warning or letter; and/or
 - Education or counselling.

More serious acts of bullying, harassment and workplace violence may also result in:

- A restriction on entering the premises;
 - Suspension; or
 - Termination.
2. If the Investigation Form reveals that the complaint was lodged intentionally with false accusations, disciplinary action against the Complainant, up to and including termination, could result.
 3. Where a complaint is unsubstantiated, appropriate remedial efforts may still be undertaken.

Primary Responsibility for Policy Implementation

Executive Director, ReStore Manager, Board President

Policy Group: Human Resources	Sub Group: General Employment	
Policy Title: CONFIDENTIALITY	Number: HR 3.3	
Applies to : Representatives		
Date Approved: 21-Mar-16	Date Revised:	Next Review Date: 21-Mar-19

Intent and Rationale

Maintaining the confidentiality of sensitive information is of upmost importance at HFHV.

Policy

All individuals who come in contact with sensitive information, either directly or indirectly through the course of their work, will treat such information as confidential indefinitely. When such information is revealed for professional purpose it is done with discretion and respect for the persons concerned.

Confidential information may include, but is not limited to, information regarding the following:

- Partner families (current, past and potential);
- Volunteers;
- Donors and funders;
- All organizations with whom HFHV has a relationship; and
- Other employees, consultants and contractors.

HFHV representatives shall also agree not to:

- Discuss or reveal human resources or volunteer information to any individuals outside of HFHV; and
- Divulge or make known any information of a sensitive or confidential nature, printed or otherwise, relating to, but not limited to information regarding HFHV finances, donors, suppliers or partner families, unless it is in the proper execution of duties.

On occasion, projects and related working documents may be designated confidential. Anyone with access to such information or documents must adhere to the strictest rules of confidentiality.

Depending on the nature of the work, a signed Confidentiality Agreement may be required in order to reflect the importance of this matter, and to protect the integrity of the information and material received related to the business conducted by HFHV.

Should an occasion arise in which an individual is unsure of any obligations under this policy, it is his/her responsibility to consult with the Executive Director. Breach of confidentiality will result in discipline up to and including termination.

Primary Responsibility for Policy Implementation

Executive Director

Policy Group: Human Resources	Sub Group: General Employment
Policy Title: ELECTRONIC EQUIPMENT AND SYSTEMS USE	Number: HR 3.5
Applies to: Staff, Consultants, Volunteers	
Date Approved: 21-Mar-16	Date Revised:
	Next Review Date: 21-Mar-19

Intent and Rationale

HFHV uses information technologies to support employees and other authorized users to work efficiently. Proper use of these technologies assists in the daily management of information and improves service delivery. Improper use may jeopardize the confidentiality, integrity and availability of HFHV's information and technology assets.

Policy

Proper use and protection of HFHV equipment, technology and services is the responsibility of all users. This includes taking responsibility to be aware of, and adhere to, all relevant Legislation, policies and standards. Personal use of these technologies and services should be at a minimum and limited to personal time.

NETWORK AND COMPUTER USE

- All software installations, upgrades, transfers and removals will be the responsibility of the network administrator, who will ensure that all required licenses are valid.
- All electronic data must be saved on HFHV's secure network and may not be exported to any third party storage sites.
- Only HFHV information may be contained on HFHV's systems or devices, or be sent from a HFHV email account.
- No users shall link their personal account to any HFHV technology.

Computer, network and Internet access may be revoked at any time for inappropriate conduct carried out on such systems, including, but not limited to:

- Sending or posting information that is defamatory to HFHV, its products, services and/or stakeholders;
- Viewing, listening to, sending or posting discriminatory, harassing or threatening messages or images. Such content includes, but is not limited to, material of a sexual nature, racial, ethnic or gender-specific slurs, or any content that offends or is intended to offend someone because of his/ her age, sex, religion, national origin, disability or other lawfully protected trait;
- Sending or posting chain letters, solicitations or advertisements not related to HFHV;
- Downloading, copying or pirating software or electronic files that are copyrighted or without authorization;
- Hacking into unauthorized websites;
- Introducing malicious software onto HFHV's network and/or jeopardizing the security of the organization's electronic communications systems;
- Engaging in private or personal business activities;
- Attempting to circumvent or subvert system or network security measures; and
- Accessing networks, servers, drives, folders or files to which the user has not been granted access or authorization.

COPYRIGHT

- Users must not use any copyrighted works, including photos, music, movies and other literary and artistic works, for anything they create or publish for HFHV.
- Users must not make, store, transmit or make available unauthorized copies of copyrighted material or software using HFHV's computers, networks or storage media.

PHONES

- Personal use of HFHV telephones, cell phones and facsimile, both in-bound and out-bound, must be kept to a minimum.
- Anyone who incurs long distance charges for personal use of HFHV phones and faxes must reimburse HFHV for these costs (making personal long distance calls is discouraged). Wilful or repeated failure to report any charges constitutes theft from HFHV.

ELECTRONIC EQUIPMENT USE

- All necessary precautions must be taken to prevent accidental damage, loss or theft of HFHV electronic equipment.
- Any problems must be reported to a supervisor immediately.
- Upon resignation, termination of employment or services, or at any time upon request, users will be asked to produce the equipment for return or inspection. Anyone unable to present the equipment in good working condition within forty-eight (48) hours will bear the cost of a replacement.
- Employees who separate from employment with outstanding debts for equipment loss or unauthorized charges will be considered to have left employment on unsatisfactory terms and may be subject to legal action for recovery of the loss. Any outstanding debt will be deducted from the employee's final pay cheque.

Given the ever-changing nature of these technologies, it is impossible to catalogue all possible abuse or misuse. Users who abuse or misuse any HFHV technology will be disciplined, up to and including immediate discharge.

Procedures

COMPUTERS, EMAIL AND INTERNET USE

All users with access to HFHV electronic data are required to use passwords, screen savers, virus protection and common sense to protect such information. Passwords must be reset annually at a minimum. All computers must be locked off when not in use and, in order to accommodate any software updates, computers must be restarted weekly. Any computer monitor that is visible to the public must use HFHV branded or generic backgrounds and screen savers (e.g. HFHV logo, landscapes).

All HFHV email accounts must contain an approved signature line and disclaimer. All messages distributed via the organization's email system are the property of HFHV, and since the Habitat for Humanity name is included in the email address, all messages reflect on the organization. There must be no expectation of privacy in anything that users create, store, send or receive on the organization's email system.

HFHV will periodically audit its systems, including e-mail, Internet access and the system network files, to determine whether there is evidence of abuse or misuse.

PHONES

Personal calls during work hours, regardless of the phone used, must be kept to a minimum, as they can interfere with productivity and may be distracting to others.

1. Personal Cell Phone Use:

While at work, employees are expected to exercise discretion in using personal cell phones. HFHV will not be liable for the loss of personal cell phones brought into the workplace.

2. Use of HFHV Provided Cell Phones

Where job or business needs demand immediate access to an employee, HFHV may issue a cell phone for work-related communications. Such equipment should be used only for business reasons.

3. Cell Phone Use While Operating a Vehicle

Staff whose job responsibilities include driving or equipment operation must refrain from using a cell phone while doing so. Drivers shall comply with all federal, provincial and local laws and regulations regarding the use of mobile technology devices. Incoming or outgoing cell phone calls are not allowed while driving. Sending or reading text messages or emails, dialing cell phones, viewing television, videos or DVD's and inputting data into laptop computers, personal digital assistants or navigation systems are prohibited while driving.

In situations where job responsibilities include regular driving and acceptance of business calls, hands-free equipment may be provided to facilitate the provisions of this policy. Under no circumstances are employees required to place themselves at risk to fulfill business needs.

Primary Responsibility for Policy Implementation

Executive Director

Policy Group: Human Resources	Sub Group: General Employment	
Policy Title: DRESS STANDARDS	Number: HR 3.8	
Applies to: Staff		
Date Approved: 25-Apr-16	Date Revised:	Next Review Date: 25-Apr-19

Intent and Rationale

To ensure that HFHV representatives preserve their own safety and present HFHV in a professional manner to all stakeholders. HFHV representatives are expected to maintain an appropriate dress standard that is neat, clean and in good condition, as determined by the requirements of the particular position.

Policy

Employees attending meetings with external stakeholders (e.g. donor prospects, candidates, suppliers, government officials) are required to dress in a professional manner appropriate to the occasion.

Since the appearance of employees is important for Habitat for Humanity’s image and could result in a loss of business, while representing HFHV any tattoos must be covered, any facial piercings removed, hair must be neat, and the following attire will be deemed unacceptable:

- Garments with slogans that may be offensive to others;
- Beach-type or cut-off shorts;
- Flip-flops; and
- Clothing that reveals undergarments or is otherwise overly revealing.

As a general rule, HFHV prefers business casual dress in the Affiliate office.

ReStore and Build employees are required to wear:

- Shirts with sleeves, preferably with HFHV branding;
- Pants at least mid-calf in length; and
- Safety approved footwear (i.e. steel-toed boots).

Procedure

When a direct supervisor deems an employee’s attire to be inappropriate, the supervisor reserves the right to send the employee home without pay.

Primary Responsibility for Policy Implementation

Executive Director, ReStore Manager

Policy Group: Human Resources	Sub Group: General Employment	
Policy Title: SMOKING IN THE WORKPLACE	Number: HR 3.9	
Applies to: Representatives		
Date Approved: 30-May-16	Date Revised:	Next Review Date: 30-May-19

Intent and Rationale

To ensure representatives understand and comply with HFHV's prohibition of smoking in the workplace. HFHV is committed to providing a smoke free environment, in accordance with all WorkSafe BC regulations.

Definition

For the purposes of this policy smoking includes:

- Marijuana, tobacco or any other combustible material; and
- Electronic cigarettes or electronic devices (usually battery operated) which provide a nicotine solution to their users, including e-cigarettes and vapourizers.

Policy

Smoking is prohibited in all HFHV workplaces, on all HFHV property and while working for HFHV.

Employees are not entitled to unscheduled smoke breaks. Representatives who choose to smoke outside the workplace during their scheduled break must do so while not on HFHV property, and must be a minimum of seven (7) metres from a doorway, window, or air intake.

Any cigarette butts, etc. must be disposed of in a safe manner.

Any representative found smoking at HFHV will be subject to disciplinary action, up to and including termination of employment, or severing of the relationship.

Primary Responsibility for Policy Implementation

Executive Director, ReStore Manager

Policy Group: Human Resources	Sub Group: General Employment
Policy Title: WHISTLEBLOWER	Number: HR 3.11
Applies to: Representatives	
Date Approved: 30-May-16	Date Revised: Next Review Date: 30-May-19

Intent and Rationale

HFHV is committed to the highest ethical standards, conducting business with maximum integrity and complying fully with all applicable laws, rules, and regulations. In line with this commitment, HFHV provides an avenue for representatives to raise any concerns they may have about the subjects covered by this policy and to be assured that in making complaints they will be protected from reprisal or victimization for raising their concerns in good faith.

Policy

Individuals who become aware of any questionable activity by a HFHV representative are encouraged to promptly report their concern to the Executive Director. If the concern is with the Executive Director, the matter should be reported to the Board President.

Such activity is called a Reportable Activity and may include but is not limited to:

- Accounting, auditing, or other financial reporting fraud or misrepresentation;
- Violations of Federal or Provincial laws that could result in fines or civil damages payable by HFHV, or that could otherwise significantly harm HFHV’s reputation or public image;
- Unethical business conduct in violation of any HFHV policy, including, but not limited to the Code of Conduct policy (HR 3.1); and
- Danger to the health, safety, or wellbeing of representatives and/or the general public (including any real or perceived threat of workplace violence, bullying or harassment).

Any representative found to have been in violation of a Reportable Activity will be subject to disciplinary action, up to and including termination of employment or legal action.

Any individual who in good faith reports a Reportable Activity will be protected from threats of retaliation, discharge, or other types of discrimination. If any representative or other individual believes they have been unfairly or unlawfully retaliated against in respect of a report made under this policy, they may file a complaint with the Executive Director, or if applicable, the Board President.

Complaints that are not made in good faith will be viewed as a serious offence and may be subject to discipline up to and including termination in the case of employees, and/or the severing of the relationship with other stakeholders.

Procedures

Representatives who observe a Reportable Activity are encouraged to submit their concern in writing to the Executive Director (or Board President if applicable), providing as much specific information as possible including details as to where and when the incident(s) occurred, the names of the individuals involved and any other relevant information.

Initial inquiries will be made by the Executive Director (or Board President if applicable) to determine whether an investigation is appropriate, and the form it should take. Some concerns may be resolved by agreed action without the need for investigation. In all cases, the person who is alleged to have committed the infraction will be made aware of the complaint at an appropriate point during the investigation.

All information disclosed during the course of an investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action and subject to applicable law.

If any Reportable Activity involves:

- questionable accounting or other matters which, if true, has, or even could have the potential to have, a material effect on HFHV's financial position or its future prospects; or
- an alleged impropriety involving a Board Member or employee of the Association,

the Board President must be notified and may call a meeting of the Executive Committee to discuss the matter or, in any event, must disclose the substance of the complaint at the next committee meeting. The Executive Committee will commence an investigation of the Reportable Activity and may enlist the assistance of one or more employees and outside legal, accounting or other advisors, as may be appropriate to conduct the investigation.

The individual who in good faith reported a Reportable Activity will receive acknowledgement that the matter was addressed.

Primary Responsibility for Policy Implementation

Executive Director, Board President