

***GPAC Governance Process Policy***  
***HANDLING OF APPARENT POLICY VIOLATIONS***

***Number: GP-17***

***Date Approved: September 15, 2016***

The Commission as a whole – not an individual Commission member - has a responsibility to regularly monitor the performance of the CEO as outlined in the policies on Commission-CEO Relationship. If there is a reasonable appearance of policy violation, even though a particular policy is not scheduled for monitoring, the Commission may choose to request a monitoring report at any time. The Commission may also use the occasion of a concern to re-evaluate the adequacy of its policy to address the issue raised.

1. Conditions which may trigger a request for monitoring beyond the normal schedule may include:

1.1.A Commission member has been contacted regarding a complaint. After the Commission member has followed the procedure for handling complaints (See Policy on Handling Complaints), the individual again contacts the Commission member indicating that the complaint still exists, and in the Commission member's opinion the incident appears to be a potential policy violation.

1.2. One or more Commission members receive complaints or become aware of a number of similar instances that taken together raise questions of general policy violation.

1.3. A single incident of complaint is of a nature that regardless of how it is resolved, there is a serious question of policy violation.

2. If any of the above conditions exist:

2.1. The Commission member shall inform the Chair of the situation.

2.2. The Chair shall request the CEO to provide to the Commission his or her interpretation of the policy, rationale for the interpretation, and evidence of policy compliance with reference to the situation(s) in question.

2.3. The Commission as a whole shall determine whether the CEO's interpretation falls within "any reasonable interpretation" of the policy.

2.4. If the CEO's interpretation falls within "any reasonable interpretation," and there is evidence of compliance with that interpretation, the matter shall be dropped at the Commission level. (The CEO will handle the issue directly with the complainant.)

2.5. If the CEO's interpretation falls outside of "any reasonable interpretation," or there is a clear violation of a reasonable interpretation, the Commission shall determine the degree of seriousness of the issue and deal with the CEO regarding performance.

3. If the incident(s) in question do(es) not appear to be a potential violation of policy:

3.1. Commission member should consider if he or she believes the policy should be reconsidered to prevent a future occurrence of a similar situation.

3.2. If the Commission member considers that a policy amendment should be made, the Commission member should ask the Chair to put the item on the next agenda.

3.3. The Commission as a whole then shall debate whether or not the policy should be amended, making the reported event explicitly unacceptable in the future.

Approved: 

Reviewed: \_\_\_\_\_

Date: 16/10/14

Date: \_\_\_\_\_