



## **POLICY MANUAL**

**Version Date: April 18, 2019**

## Introduction

These are the policies of the Upper Canada Leger Centre for Education and Training. They are intended to guide the decisions and actions of the Board. At the same time they are to serve as a basis for procedures made under the policies to direct staff in more specific responsibilities for carrying out the intent of the policies. All policies are in keeping with UCLCET's "By-Law Number 1: A By-Law Relating Generally to Conduct of the Affairs of the Upper Canada Leger Centre for Education and Training."

This is the first such manual for UCLCET. It shall include policies, procedures and attendant forms in the following areas:

- Section 1: Governance
- Section 2: Human Resources
- Section 3: Finance
- Section 4: Operations
- Section 5: Information Technology

This manual is meant to be a living document with policies, procedures and other documentation added, deleted and altered to meet the changing needs of the organization.

All policies and procedures have been designed using an identical format for ease of access. Further, all policies have a three-year revision cycle as noted in the first section of the policy. As this is the first formal issuing of this manual, all these policies will be assigned an adoption date of April 18, 2019 and a review date of September 1, 2022. Following this first issue, all policies will be dated from the time of adoption by the Board and assigned a review date three years from that date. Any policies may be examined for possible revision prior to the review date noted, if and when deemed necessary by the UCLCET Board of Directors.

A Note on Terminology: Each policy is considered a "stand alone" item. For that reason the following conventions shall be used with regard to the name of the organization. The first reference in each policy to the organization shall be the Upper Canada Leger Centre for Education and Training. All subsequent references to the organization shall be either "UCLCET" or "Corporation."

In addition, and in keeping with "By-Law Number 1," the term "Board" (upper case) shall refer to the Board of Directors of UCLCET and the term "board" (lower case) shall refer to the general notion of a board in any organization.

## Section 1 – Governance

*Policy:* Policy Development, Management and Form

*Policy Number:* G-1

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

### *Purpose:*

To create a process for developing policies for the UCLCET,  
To provide direction for the management of those policies,  
To clarify the difference between policies and procedures,  
To provide a model and explanation for the form of the policy in order to ensure both continuity and ease of access among all policies.

### *Rationale:*

Policies are an essential part of any organization in that they provide a guide to action. As a group, they allow an organization to be in control of itself. Given their importance, it is necessary for an organization to define what it means by policy, to separate policy from procedure and to ensure that a process is in place to keep policies relevant and up-to-date with current legislation and best practice. An essential part of the usefulness of policies is to ensure that they are in a consistent form for easy access and that they are brief, concise in language and general in application.

### *Definition of Terms:*

A *policy* is a general statement of direction which manifests an organization's mission, values and goals. It directs, in a general sense, organizational activities and is an aide in the crucial functions of decision-making and communication. Policy development is within the purview of the governing board and can be approved only by the board.

A *procedure* is a more specific guideline employed by staff and the organization as a whole to guide individual actions under the appropriate policy. Procedure development is within the purview of the management staff and may go to the governing board for information. All procedures must emanate from a policy but a policy need not have accompanying procedures.

*Policy and Procedures Management* refers to the process of initiating the establishment of a policy and, if required, an attendant procedure, taking what is developed through a recognized process of review, development and adoption on a cyclical basis.

### *Policy Statement:*

1. Policies may be initiated at the level of the Board of Directors, its committees or by management staff seeking Board direction.

2. All policies shall go before the Board for review, discussion, alteration and approval. The Board has the sole authority to approve policy.
3. All policies shall have a three-year review cycle dating from the original approval date.
4. All policies, unless otherwise directed by the Board, shall be available to the public at large and to organizations with whom the Upper Canada Leger Center for Education and Training interacts.
5. Upon approval of a policy, and if appropriate, the Board shall direct staff, through the Executive Director, to develop procedures to implement the policy. The Board may request that these procedures go before it for information.
6. Policies may or may not require procedures; no procedure can exist without a policy as its basis.
7. It is the duty of the Executive Director to maintain an updated policy manual in electronic and hard copy and to ensure that the copies which he/she maintains are updated on a regular basis in keeping with the revision cycle. The Executive Director is responsible, therefore, for the policy management cycle.
8. All policies shall follow the following format:
  - a) Purpose - A general statement or statements on the intent of the policy,
  - b) Rationale - An outline of the reason for the establishment of the policy,
  - c) Definition of Terms - A description of the key terms used in the policy statement,
  - d) Policy Statement - A general pronouncement outlining the Board's stance on a practice, condition or direction,
  - e) Reference Documents - A list of references from provincial or federal legislation, policy memoranda or other Board policies which infuse and support the information contained in the policy statement and references to any extant UCLCET procedure or form that are in support of the policy.

*Policy: Roles and Responsibilities of Board Members*

*Policy Number: G-2*

*Date of Policy: April 18, 2019*

*Review Date: September 1, 2022*

*Purpose:*

1. To provide direction to Board members on the duties and responsibilities to be undertaken as members of the Board,
2. To confirm that those duties and responsibilities are in keeping with the terms of reference under which the Upper Canada Leger for Education and Training was established.

*Rationale:*

Recent research has tended to concentrate on boards' terms of reference, types of boards and functions of boards. In most cases, however, the responsibilities of board members have been less carefully articulated. These functions come under scrutiny when governance reviews are undertaken. This policy seeks to clarify roles of board members in a general sense as a back drop to the roles outlined or suggested in the terms of reference.

*Policy Statements:*

1. A Board member shall be an advocate of/for:
  - *Accountability* to the various public he/she serves. The Corporation has set before its communities a range of programs and services that it offers. That community expects that those programs and services will be of the highest quality, delivered by the most able personnel and offered in a safe environment.
  - *Effective Planning and Direction* to ensure that those programs and services remain current and continue to be of the type that will support the Corporation's growth and effectiveness.
  - *Effective Governance* which, while providing overall direction, oversees its own internal structures to facilitate among other functions, effective decision-making and communication and promotes harmonious Board-staff relationships.
  - *Fiscal Responsibility* which includes the assiduous management of current resources while carefully assessing and taking advantage of opportunities for advancement of the Corporation's financial situation.
  - *Advocacy* for the corporation to enhance both its reputation and the opportunities to expand its range of services for the betterment of the Corporation and the community

*Resources:*

By-Law Number 1: A by-law relating generally to the conduct of the affairs of the Upper Canada Leger Centre for Education and Training.

*Policy:* Conflict of Interest for Board Members and Employees of UCLCET

*Policy Number:* G-3

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

*Purpose:*

To provide members of the Board and employees of the Upper Canada Leger Centre for Education and Training with directions on conflict of interest which will protect both the individuals and the organization from charges of violating their legal responsibility in this regard.

*Rationale:*

Board members and employees alike of UCLCET occupy positions of trust and public confidence. As such they are expected to discharge their duties and responsibilities professionally and impartially. It is, therefore, imperative that Board members and staff be seen as acting in the best interests of the public they serve, and that they do not compromise themselves and the Corporation in the discharge of their duties by seeking personal gain for themselves or for family members.

*Definition of Terms:*

For the purposes of this policy #G.3, *Conflict of interest* is defined as any direct or indirect interest, in connection with, or benefit from, outside activities, especially business activities in which involvement might adversely affect the organization or the Board or benefit the Board member or employee directly or indirectly as a result of that individual's position with the organization. Board members and employees must remain free of any such obligations, interest or distraction that may adversely affect or interfere with the Employee's or Board member's judgment and/or objectivity in the performance of his/her duties.

*Board member* refers to any member of the Board of UCLCET or to any person serving part of a term as a member of the Board or one of its standing or ad hoc committees.

*Employee* refers to all persons who are currently engaged in any active employment with the organization, regardless of the employment status (e.g. full time, part time, regular, term or contract.)

*Policy Statement:*

1. The onus shall be on each Board member and employee to anticipate and to avoid conflicts of interest. No Board member or employee shall have an interest, direct or indirect, in any supplier to the Corporation which might:

- produce personal gain for the individual at the expense of the Corporation,
- detract from the time and energy which such individuals ought to devote to their duties on behalf of the Corporation,
- cause embarrassment to the Corporation,
- leave the individual open to pressure that might affect the interests of the Corporation.

2. Board members and employees alike must be cognizant of the need to avoid not only real conflicts of interest but also being placed in a situation that could give the appearance of conflicts of interest.

3. Whenever a Board member or an employee considers that he/she could be, or be seen to be, involved in a conflict of interest he/she shall disclose, within two business days, the situation to either the Chair of the Board (if Board member) or the Executive Director (if employee) and consult with that individual as the case may be. A formal determination on the issue will be communicated to the Board member or employee in writing and will be considered binding pending any appeal.

4. Any unresolved conflict of interest matter shall be resolved through existing appeal procedures in the Corporation.

5. Failure to abide by this policy may result in removal from the Board, dismissal of an employee and possible legal action.

6. The Executive Director is authorized to issue such procedures as may be necessary to implement this policy.

*References:*

The Income Tax Act (2016)

Municipal Conflict of Interest Act, 8, R.S.O. 1990 c. M.50

Local Government Disclosure of Interest Act, 1994.

*Policy: Confidentiality and Disclosure of Information*

*Policy Number: G-4*

*Date of Policy: April 18, 2019*

*Review Date: September 1, 2022*

*Purpose:*

1. To ensure the protection of personal information in the custody or under the control of the Upper Canada Leger Centre for Education and Training,
2. To facilitate access to the information in keeping with the guidelines set out in the Municipal Freedom of Information and Protection of Privacy Act

*Rationale:*

Especially in the electronic age, it is important that information be housed in a secure setting and be accessed only by those who, under municipal, provincial and federal legislation, have legal access to it. Conversely, individuals also have rights under the law to some kinds of information and data stored within organizations. UCLCET recognizes and accepts its responsibilities under the Municipal Freedom of Information and Protection of Privacy Act.

*Definition of Terms:*

*Access* means the authority or permission to consult records or to obtain restricted information.

*Confidential Record* means a record containing certain information that requires protection against unauthorized access or disclosure.

*Informed Consent* means consent when the person consenting understands the nature of the information for which the consent is sought and understands the consequences of signing a consent form.

*Personal Information* means recorded information about an identifiable individual. It includes, but is not limited to, such matters as race, national or ethnic origin, colour, gender, age, sex, phone or cell numbers, addresses or identifying numbers assigned to that individual including a social insurance number, driver's license number etc.

*Privacy* means the quality or condition of being secluded from the presence or view of others.

*Security* means the protection of private information regardless of the format in which it is held including physical, technological and organizational measures designed to limit access.

*Policy Statement:*

1. The Board shall designate the Executive Director as the administrator directly responsible managing all responsibilities associated with protection of privacy and freedom of information.



2. The following nine principles shall guide the Executive Director in this management function:

- Personal information will only be collected for specified purposes, duly noting the legislative authority for the collection,
- Informed consent is required for the collection, use or disclosure of personal information, except where otherwise permitted by law,
- The collection of personal information will be limited to that which is necessary for the purposes identified,
- Personal information may only be used, retained or disclosed for the purposes for which it was collected,
- Personal information collected, used or disclosed shall be accurate, complete and up-to-date as is necessary,
- Personal information in the custody of UCLCET shall be protected,
- All policies and procedures relating to the management of personal information shall be made readily available to the public,
- Any individual has the right to access his or her information, to challenge its accuracy and completeness and be notified of all requests for access to that information
- The denial of access to personal information should be limited, specific and in accordance with the exemptions set out in the Act, with the ability of such decisions (denials) to be reviewed by an independent agency as per the Information and Privacy Commissioner of Ontario appeal process.

3. The Executive Director shall ensure that an individual shall have the ability to address or challenge compliance with these principles through the appeal process in accordance with the Act.

4. The Executive Director is authorized to issue such procedures as may be necessary to implement this policy.

*Resources:*

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Chapter M.56  
Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Reg. 372  
Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Reg. 823

## Section 2 – Human Resources

*Policy:* Staff Orientation

*Policy Number:* HR-1

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

*Purpose:*

To establish a basis for assisting new employees of Upper Canada Leger Centre for Education and Training in understanding the form and function of the organization and the role they play in it,

To ensure that employee orientation is seen as a first step in an integrated program for staff development, appraisal and training.

*Rationale:*

The most important resource any organization has, regardless of size, purpose or structure, is human. A knowledgeable, engaged and satisfied staff is essential to the quality of the services and programs an organization delivers. Research shows that a continuum from the creation of useable job descriptions, rigorous hiring procedures, staff orientation, supervision, assessment and exit strategies are the earmarks of the most successful organizations. Staff orientation is one of the most important of these critical points on the continuum because it represents the first opportunity for an organization to socialize its new employees and make them feel part of a larger enterprise.

*Definition of Terms:*

*Orientation* is the human resources activity which introduces new employees to the enterprise and to their tasks, superiors, co-workers and work groups. It enables new employees to reach desired standards of performance, reduces start-up costs, anxiety and employee turnover and saves time for the organization.

*Employee* refers to all persons who are currently engaged in any active employment with the organization, regardless of the employment status (e.g. full time, part time, regular, term, or contract.)

*Policy Statement:*

1. UCLCET shall have in place an orientation program for all new employees.
2. Orientation shall be handled by the person responsible for this human resources function in UCLCET along with the new employee's supervisor as appropriate under the direction of the Executive Director.

3. New employees will be furnished, as an initial step, with electronic or hard copy resources including, but not limited to, materials on UCLCET as an organization, a job description, a copy of the letter of employment which is in keeping with the Ontario Ministry of Labour's employment pronouncements, relevant practices pertaining to health and safety, harassment free workplaces and other human resources policies either mandated by the province or developed by UCLCET for its own purposes.

4. New employees shall be encouraged to read the materials carefully and, in the case of any human resources policies, acknowledge through their signatures, that they have read these policies and are cognizant of their and the Corporation's responsibilities.

5. Where possible and within available resources, new employees shall be assisted by an appointed mentor to help initiate the new employee into UCLCET's policies, procedures and practices under the direction of his/her supervisor.

*Resources:*

The Employment Standards Act, 2000

*Policy:* Exit Program

*Policy Number:* HR-2

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

*Purpose:*

To establish a basis for gathering information on employees leaving the organization, To ensure that the information gleaned in the exit process will be analyzed and, if appropriate, used to alter practices within the organization.

*Rationale:*

Employees leave organizations for many reasons - for reasons of relocation, seeking a different and/or more lucrative employment situation or a level of dissatisfaction with his/her role or individuals in the organization. Exit procedures are one of the most important features of an employment continuum within an organization because such interviews allow an organization to use information to change and improve as a result of the departing employee's experience.

*Definition of Terms:*

*Exit procedures* refer to the practice of gathering information from departing employees as one source of data on which decisions can be made about improving, changing, eliminating or enhancing current policies, procedures and practices as a way developing the organization further.

*Employee* refers to all persons who are currently engaged in any active employment with the organization, regardless of the employment status (e.g. full time, part time, regular, term, or contract.)

*Policy Statement:*

1. The Upper Canada Leger Centre for Education and Training shall have in place an exit program for all departing employees.
2. The exit program shall be handled by the person responsible for this human resources function in UCLCET under the direction of the Executive Director.
3. When an employee leaves UCLCET for any reason, the person responsible for this human resources function shall make arrangements to meet with that person and gather information on why he or she is leaving the organization and what he/she sees as what the Corporation needs to change, continue or stop.

4. This information shall be filed in the employee's human resources file with a copy kept in human resources with the name removed as a resource with other similar documents for examining any commonalities that can be used for altering UCLCET's practices.

### **Section 3 - Financial**

*Policy: Spending Limits*

*Policy Number: F-1*

*Date of Policy: April 18, 2019*

*Review Date: September 1, 2022*

*Purpose:*

To provide a basis for spending limits of staff.

*Rationale:*

The setting and periodic monitoring of an annual budget is one of the primary responsibilities of a board. This function is recognized in virtually all boards and is supported by research on effective governance. At the same time, boards recognize that many, if not most, expenditures should be authorized at the staff level insofar as those expenditures are in keeping with the overall intent expressed in the budget and insofar as expenditures do not exceed levels set out for staff. A clear division of responsibilities between board and management in spending limits ensures that the organization will meet its financial obligation in the most expeditious fashion while honouring board oversight of financial matters.

*Definition of Terms:*

A *spending limit* in organizational terms is the largest amount identified by a board which doesn't require any authorization beyond that employee's supervisor or the board.

*Policy Statement:*

1. The Board recognizes that it has general authority over the budget. It further recognizes that there are areas within the budget where spending authority is the purview of the Board only and where it grants wide general authority to selected staff through the Executive Director.
2. At least one member of the Board of Directors shall authorize all expenditures that are separately or cumulatively in excess of \$100,000 to a single supplier.
3. For amounts below that, the Board shall direct the Executive Director to establish a limit for other employees who a) may be required to make expenditures in carrying out their duties, and b) whose positions are at a level of responsibility commensurate with such a requirement.
4. If there is a need to exceed the limit either as the Executive Director or as an alternative employee, the individual shall receive the approval of the Chair of the Board or the Executive Director (if an employee).

5. The Board shall reserve the right to request a report on staff expenditures by position should it deem such a request necessary.

6. The Executive Director is authorized to issue such procedures as may be necessary to implement this policy.

*Policy:* Spending Approvals and Sign Offs

*Policy Number:* F-2

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

*Purpose:*

To provide Board members and staff with general guidelines for spending approvals and sign-offs,

To ensure that the Upper Canada Leger for Education and Training, its Board members and its staff are protected against any challenges pertaining to spending.

*Rationale:*

In the conduct of its business affairs the Corporation relies upon many individuals to sign cheques, purchase orders and other forms of payments/business transactions. In order to protect the Board's assets and the position of individuals so engaged, it is advisable to put in place policies, procedures and practices to enhance the degree of protection.

*Definition of Terms:*

*Initiator* refers to the individual who is requesting a second signature on documentation which is associated with the Corporation's commitments, expenditures and all other financial arrangements carried out in the name of the Corporation.

*Policy Statements:*

1. The Board shall endorse the convention that all financial commitments/expenditures require a minimum of two signatures for approval.

2. In all cases the individuals must be able to have an informed opinion as to whether or not the expenditure is commensurate with the duties and responsibilities of the initiator, is compliant with Board policies pertaining to spending limits et al and advances the interests of the Corporation.

3. The Board also shall require a Board member signature for amounts exceeding \$100,000 regardless of the role or level of responsibility of the initiator. The signatures must be in keeping with those conditions outlined in (2) above.

6. The Executive Director is authorized to issue such procedures as may be necessary to implement this policy.

*Policy:* Financial and Program/Service Diversification

*Policy Number:* F-3

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

*Purpose:*

1. To establish a basis for Board action and direction on financial management to ensure that the Upper Canada Leger Centre for Education and Training is both protecting itself against financial risks while attempting to maximize its resources through a responsible, measured and well-researched process to increase revenues.

*Rationale:*

As a self-funded organization, the Corporation seeks to improve its financial status, to enhance stability and to increase revenues through diverse methods. Diversification through market analysis (in financial and non-financial terms) is one method of reducing risk and increasing revenue possibilities. In the area of finance, this means a careful deployment of available resources over a period of time to increase those resources already in existence. In the area of program/services, this means an equally careful analysis of trends in the areas in which the Corporation is already involved (recruitment of foreign students, for example) and an examination of others areas where organizations similar to UCLCET are experiencing success.

*Definition of Terms:*

*Financial Diversification* is the process of allocating capital in a way that reduces exposure to any one particular financial asset or financial risk. A common path towards diversification is to reduce risk or volatility by investing in a variety of assets.

*Program/Services Diversification* is the process of adding to an organization other programs and services that, while addressing the mission of the organization, increase its financial viability, enhance its reputation and serve to a higher degree the community the organization was establish to serve.

*Policy Statement:*

(Financial Diversification)

1. The Board shall accept in principle that the deployment of current resources to increase its revenue base while minimizing any risk to its financial situation should be a matter of regular consideration.

2. The Board may direct staff to assess financial options and report back to it on the possible advantages and disadvantages of using those resources for that purpose.

3. Should the Board decide that such financial diversification is advisable, it will require from staff, as part of its regular annual budget submission, a plan for financial diversification which includes a clear and detailed description of risks and possible advantages that will allow the Board to make an informed decision on the possible diversification action.

(Program/Services Diversification)

4. The Board shall accept in principle that the examination of current programs and services and future programs and services should be a matter of regular consideration.

5. The Board may direct staff to assess current program and service options to determine their value to the Corporation and the community and to gather information from like organizations in the province and elsewhere that may add to the growth and improvement of the organization financially and programmatically.

6. Should the Board decide that such programmatic diversification is advisable, it will require from staff a detailed explanation of the following:

- a) the reason for the elimination of certain existing programs and services
- b) the nature and viability of newly proposed programs and services
- c) the costs associated with introducing new programs and services
- d) the expected revenues to be generated by the above, and
- e) a time line for the introduction of the above



*Policy: Cash Flow*

*Policy Number: F-4*

*Date of Policy: April 18, 2019*

*Review Date: September 1, 2022*

*Purpose:*

To provide direction to staff on the display and management of cash flow within the organization.

*Rationale:*

Most organizations experience significant variability in their cash reserves over the course of a fiscal year. In some cases, an organization may need to borrow on a short term basis to support cash flows; the same organization may, however, find itself with a significant surplus within the same fiscal year. With careful planning many organizations may find themselves in a situation where the cash flow has been modified to ensure that borrowing is not necessary.

*Definition of Terms:*

*Cash flow* refers to the movement of cash in and out of an organization over a prescribed period of time. A cash flow statement captures both the current operating results and the accompanying changes in a balance sheet. As an analytic tool, the statement of cash flow is useful in determining the short-term viability of an organization, particularly its ability to pay its bills.

*Policy Statement:*

1. The Board recognizes that variability in cash flows is a common occurrence in many organizations including the Upper Canada Leger Centre for Education and Training.
2. Its stated preference is that, where possible, cash flow should be regularized to avoid unnecessary borrowing costs.
3. The Board may request from its staff an annual cash flow plan to be appended to the budget document. The plan will show the expected cash flows on a quarterly basis in sufficient detail to tie the cash flow to the budget for that period.
4. Such documentation will be used to assess the viability of altering cash flow patterns to achieve its preference as stated in (2) above.

## Section 4 - Operations

*Policy:* Workplace Health and Safety

*Policy Number:* OPS-1

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

*Purpose:*

To provide a basis for the establishment and maintenance of a safe and healthy physical environment for all Upper Canada Leger Centre for Education and Training Employees and for others using facilities under the auspices of the Corporation.

*Rationale:*

Employees and users of facilities must be able to expect that the facilities themselves and the practices that are followed in those facilities are safe and clean and are monitored on a regular basis to remain such. In addition, it is reasonable for employees and other users of the facilities to expect that those working in the facilities have been trained in the maintenance of a physically safe working environment and are knowledgeable about their responsibilities in making it so.

*Definition of Terms:*

*Occupational health and safety* refers not only to the condition of the facilities themselves but also to the practices that are carried on in those facilities.

*Users* refers to any person or person who is accessing a facility for the expressed purpose of taking part in activities or functions sponsored by UCLCET.

*Employee* refers to all persons who are currently engaged in any active employment with the organization, regardless of the employment status (e.g. full time, part time, regular, term, or contract.)

*Policy Statement:*

1. UCLCET is committed to the health and safety of all Employees, students and other authorized occupants of the facilities used by UCLCET.

2. The health and safety of all people shall take precedence over expediency. Injury, illness and loss prevention shall be an operational responsibility which may require decisions at the highest governance and management levels of the organization.

3. Pursuant to the Occupational Health and Safety Act, the Board and the Executive Director shall take every precaution reasonable in the circumstances for the protection of employees and the users of the facilities. As part of an effective internal responsibility system, it is also UCLCET's expectation that all Employees will take every reasonable precaution to prevent personal injury in the performance of their tasks and to assist in the provision and maintenance of safe facilities and practices.

4. In that UCLCET's Employees generally work remotely or in a facility operated by another organization, it is expected that UCLCET Employees, where appropriate, will take advantage of programs and services offered in that facility, viz.

- training to ensure that staff are competent to perform their respective tasks,
- provision of occupational health and occupational safety programs to disseminate the latest developments in occupational health and safety and disease prevention,
- the establishment of a safety representative or member for an existing committee in the facility so that occupational health, safety and environmental issues in the organization can be addressed or directed to the appropriate agency.

5. The Executive Director is authorized to issue such procedures as may be necessary to implement this policy.

*References:*

Ontario Occupational Health and safety Act, R.S.O. (as amended)

*Policy: Client Complaint*

*Policy Number: OPS-2*

*Date of Policy: April 18, 2019*

*Review Date: September 1, 2022*

*Purpose:*

To provide a basis for both Board and management staff action on how to address client complaints.

*Rationale:*

Through its range of offerings, the Upper Canada Leger Centre for Education and Training and its personnel are in contact with a large and diverse public who use the services of the Centre. While every attempt will be made to engage with all contacts in a harmonious fashion, conflicts or complaints may arise which need to be addressed in a candid, equitable and systematic fashion.

*Definition of Terms:*

A *complaint* is a statement of dissatisfaction or grievance about a person, policy, program or service, that is directed at an organization for either information or resolution. The complaint can be informal (verbal assertion) or formal (written assertion).

A *client* is a person or organization engaged with the UCLCET as a user of its program or services.

*Policy Statement:*

1. The Board shall recognize its obligation to its clients and its responsibility in addressing complaints that arise against the organization in a fair and expeditious fashion.
2. It also supports the premise that complaints should be handled, where possible, at the level where the complaint is focused and by the individuals most closely associated with the situation.
3. The Board also supports the notion that, should a complaint not be addressed in a satisfactory manner by individuals within the organization as perceived by the complainant,

every complainant has the right to appeal to the Board for a review of the complaint, the action taken and the decision made.

4. Should the Board be asked to review the complaint and make a decision, the decision of the Board shall be final.

5. In keeping with Statement 2 (above), the Board shall direct staff to abide by the following conventions in addressing the complaint:

- a) The complainant shall be asked to raise the complaint with the person or persons in the organization most closely associated with the presenting issue to seek a successful resolution to the issue,
- b) Should the issue not be resolved at that level, the complainant will be asked to inform the Executive Director in writing of the issue and the response of the person to whom the complaint was directed,
- c) The Executive Director shall then review the submission, gather additional information from both sides and submit in writing his/her response. The latter must include a formal statement that the complainant always has the right to appeal the decision to the Board,
- d) Should the complainant decide to appeal to the Board, he/she shall inform the Board in writing at which time the Board will direct the Executive Director to furnish the Board members with any and all notes and correspondence extant,
- e) The Board may seek additional information by requesting that both parties go before it to clarify any outstanding issues or concerns,
- f) The Board shall, having reviewed all the information available to it, make its decision and then direct the Executive Director to inform the complainant of the decision.

6. In carrying out its investigation of the complaint the Board will do so within the confines of the provincial statutes on freedom of information and protection of privacy.

7. The Board recognizes that each complaint is highly individualized in nature and complexity. While no time limit for resolution will fit all complaints, the Board is committed to address all facets of the process in the most expeditious fashion within the limits of its resources including personnel and time.

*Resources:*

Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Chapter M.56  
Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Reg. 372  
Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, Reg. 823

*Policy: Risk Management*

*Policy Number: RM-1*

*Date of Policy: April 18, 2019*

*Review Date: September 1, 2022*

*Purpose:*

1. To establish a basis for Board action and direction on risk management to ensure that the Upper Canada Leger Centre for Education and Training aims are achieved with due care and consideration and that significant risks are known, managed and monitored.

*Rationale:*

As a charitable organization with the objective of the development, implementation, and advancement of community educational and training programmes, the Organization is entrusted by many stakeholders and clients to carry out activities with due care for safety and risk reduction.

*Policy Statement:*

1. The physical safety and health of UCLCET Board members, Employees, and clients is paramount in all of the Corporation's activities.
2. The Board entrusts the Organization's staff, under the leadership of the Executive Director, to monitor the degree of risk inherent in all aspects of the Corporation's operations on an ongoing and consistent basis.
3. The Board may direct staff to report on current program and service activities to identify related risks and related mitigation strategies.
4. Should the Board decide that such risk assessment is advisable, it will require from staff a detailed explanation of the following:
  - a) Identification of risk through examination of:
    - what is going to happen
    - what else could happen
    - what could go wrong
    - why could it go wrong
    - where could it go wrong
    - when could it go wrong
    - what are the other implications

- external factors.
- b) A strategy for management of the risk through consideration of:
- the likelihood of it happening (Low, Medium, High)
  - how often will it happen
  - the impact of the harm or loss to the Corporation (Low, Medium, High)
  - how it can be avoided and/or the consequences minimized
  - the recovery programme to rectify the damage
  - whether we should continue with the event / activity.

5. The Executive Director is authorized to issue such procedures as may be necessary to implement this policy.

## Section 5 – Information Technology

*Policy:* Disaster Recovery

*Policy Number:* IT-1

*Date of Policy:* April 18, 2019

*Review Date:* September 1, 2022

*Purpose:*

1. To ensure the Upper Canada Leger Centre for Education and Training resources and, in particular, its information management systems are protected in the face of either natural or man-made disasters.

*Rationale:*

While the Corporation is most likely to use facilities and equipment that are actually owned by other organizations, it is likely that some equipment may have been purchased by the corporation which may be the sole owner. Those resources need to be protected. In addition, the UCLCET, like most organizations, relies heavily on technology for the management of its affairs. This includes the storage of vital and sometimes confidential information needed to support the functions of the Corporation. It is imperative, therefore, that measures be taken to protect all those resources.

*Definition of Terms:*

*Cloud Storage* is a model of information storage in which the digital data is stored in logical pools in the ethernet. A physical setting for the information storage is not required.

*Computer Architecture* refers to a set of rules and methods that describe the functionality, organization, and implementation of computer systems.

*Off Site Secure Storage* refers to the use of external organizations to store securely all information that can be stored in the cloud but also the architecture of the system which is used to organize the data.

*Policy Statement:*

1. The Board recognizes the need to protect its assets as well as the information it holds in the carrying out of its duties and responsibilities.



2. As an organization UCLCET uses the equipment and facilities of other organizations. In most cases those facilities and some of the equipment are owned and insured by those organizations.
3. The Board shall be responsible for ensuring that what it owns is properly maintained and insured.
4. In the area of technology, the Board shall, through its staff, ensure that the information it has in its possession is protected through the use of current cloud technology where possible and applicable.
5. In addition to the above, and in recognition of the fact that cloud technology does not yet provide the capability of protecting the architecture of the system, the Board shall ensure that both the information and the architecture be protected through the purchase of physical electronic storage devices as necessary to back-up required files.
6. The Executive Director is authorized to issue such procedures as may be necessary to implement this policy.