

Policy on the Management of Complaints Regarding Non- Compliance with the Provisions of the Decree



Adopted by the Board of Directors on January 20, 2021

Preamble

In its [Declaration of Services](#), the Parity Committee for Security Guards, hereinafter referred to as the Committee, puts forward its values and service commitments in carrying out its mission. Complaint management is part of the services offered. The Policy on the Management of Complaints Regarding Non-Compliance with the Provisions of the Decree is therefore in keeping with the spirit of the management process for this type of complaint.

Objectives

The objectives of this policy are to:

- Ensure structured and consistent handling of complaints received, in accordance with the values and commitments of the Declaration of Services.
- Clarify roles and responsibilities
- Inform the subjects of the various existing processes

Definitions

Complaint or denunciation: Communication of non-compliance with a provision of the Decree respecting security guards, addressed to a designated representative of the Parity Committee for Security Guards.

Complainant or whistleblower: Any employee or professional employer subject to the Decree respecting security guards.

Professional employer: An employer/security agency that employs an employee or employees within the scope of the decree and a person carrying out or having someone else carry out for others security work provided for in paragraph 20 of the Decree respecting security guards.

Employee: A person/security guard who, on behalf of or through a security agency, performs security work as defined in paragraph 20 of the Decree respecting security guards.

Scope of application

This policy is in place for employees of the Committee with respect to complaints received regarding non-compliance with a provision of the Decree by a professional employer.

Principles

Confidentiality and diligence

All complaints will be treated with the same attention, impartiality and confidentiality.

Accessibility and simplicity

The Committee wishes to make this policy known to everyone by publishing it on its website.

Accordingly, [any employee wishing to file a complaint](#) may easily do so by filling out the complaint form concerning the Decree made available to them.

[Any employer wishing to report](#) non-compliance with the Decree may easily do so by completing the denunciation form concerning the Decree provided.

Committee responsibilities

The Committee is committed to ensuring that all its employees cooperate in the process of managing complaints about non-compliance with the provisions of the Decree. As such, it is the responsibility of each employee, according to their role, to listen to and assist a person who brings to their attention a situation regarding non-compliance with a provision of the Decree.

Client responsibilities

In order to facilitate compliance with the Committee's responsibilities in the management of complaints concerning non-compliance with a provision of the Decree, any person who files a complaint or report on this subject must:

- Complete the complaint form concerning the Decree or the denunciation form concerning the Decree
- Provide all information relevant to the processing of the complaint or denunciation
- Work with the Committee to ensure the effective handling of the complaint or denunciation

Complaint handling process

Any employee who contacts the Committee regarding non-compliance with a provision of the Order shall be informed that they may file a complaint.

Within a few days of receiving the completed complaint form, including consent to the disclosure of the employee's name to the employer concerned, a letter confirming receipt of the complaint and the opening of the file will be sent. This letter will contain the following information: the file number, the name of the employer concerned and the name and contact information of the inspector assigned to the file, if applicable.

Processing of the complaint

Several steps will be completed by the inspector assigned to the file. These steps may vary depending on the file.

- a. Review of information and documents received from the employee
- b. Consultation of information from the employee's file at the Committee
- c. Communication with the employee to gather additional information, if necessary, for the analysis of the employee's file. Depending on the file, a meeting may be required
 - i. When the Committee does not obtain the cooperation of the complaining employee and the latter neglects to provide the information and documents necessary for the processing of the complaint, the Committee reserves the right to send a notice to the complaining employee giving them a final deadline of 10 days to submit the missing elements for the processing of their complaint without which the file will be closed.
- d. Communication with the employer in order to obtain the information and documents required for the analysis of the file. Depending on the case, a meeting may be required
- e. If necessary, additional communications may be made to the employee and/or the employer
- f. Possible additional verifications depending on the case. For example, physical verification of the workplace or requesting documents/information from the client
- g. On the basis of the facts and evidence, determining whether or not the complaint is substantiated
- h. If applicable, a request for adjustment will be filed with the employer and/or a claim(s) will be filed

Review of decisions and conciliation

If the complainant is not satisfied with the outcome, the complaint will be transferred to management for an evaluation of the case. All aspects of the complaint will be re-evaluated. Management will contact the employee to inform them of their decision and provide the relevant explanations. If the complainant remains dissatisfied with the outcome, the process and relevant contact information will be communicated to the complainant.

Denunciation handling process

Any employer who contacts the Committee regarding non-compliance with a provision of the Decree shall be informed that they may file a report. They are also informed of the form that must be completed for this purpose.

All reports received are archived.

The Manager of the Inspection Department will analyze and evaluate the whistleblower reports received and assign cases according to the overall priorities of the Inspection Department. The Committee is not required to contact the whistleblower to discuss the progress of the investigation.

Processing of the file

There are several types of denunciations. The handling of the file will vary depending on the nature and extent of non-compliance with the provisions of the Decree. One or more of the following actions will be taken.

- a) Review of information and documents received from the whistleblower.
- b) Consultation of the information in the file of the employer concerned.
- c) Consultation of the information in the file of the employees concerned.
- d) Depending on the case, a general audit of the employer's registration system may be required.
- e) Communication with the employer to obtain the information and documents required for the analysis of the file. Depending on the case, meetings may be required.
- f) Communication with the employees to gather additional information, if necessary, for the analysis of the file. Depending on the case, meetings and/or interviews may be required.
- g) Additional audits related to various employer contracts. For example, physical verification of work sites or requests for documents/information from clients.
- h) On the basis of the facts and evidence, determining whether or not the complaint is substantiated.
- i) If applicable, a request for adjustment will be filed with the employer, claims will be filed, an audit report containing observations and required actions will be prepared and delivered to the employer being audited.