

Complaint Adjudication Process

A) Initial Receipt of Complaint and Triage for Conduct Complaints

1. Upon receipt of the complaint, the ITW rep will obtain the relevant details from the complainant.
2. Once the details are received, the ITW rep will triage the complaint as actionable or not actionable. They will determine if the complaint involves a member or a non-member attendee. They will further determine if the conduct took place at an ITW event or elsewhere.

B) Definitions

1. An ITW event shall include any event, program, or function organized by ITW whether it takes place in person, or online, and shall include all communications and activities attendant to that event.
2. A non-actionable complaint is one which deals with subject matter not covered by the Code of Conduct.

C) Non-Actionable Complaints

1. If the complaint is deemed to be non-actionable the complainant will be told that ITW is not in a position to assist them with the matter.

D) Resolution of Complaints involving non-member attendees at ITW events

1. If the complainant is made against an attendee, the relevant information will be gathered and then the individual in question will either be warned or excluded from part or all of the conference at the discretion of the event director.
2. In the case of an attendee being excluded from an event, the facts will be reported to the Safety and Security Committee (hereafter SSC) who will review the matter and make a recommendation to the board on the length of the exclusion, and any conditions that may be attached to the attendee returning to ITW events, or becoming an ITW member at a later date.

E) Informal Complaint Resolution for Complaints involving members at ITW Events

1. Unless the complaint involves violence or direct sexual harassment, the ITW representative will offer the complainant the option to make a formal, or informal complaint, and explain the differences between the two processes. Complaints involving

violence or direct sexual harassment shall be dealt with via the Formal Complaint Process described in F. below.

2. In the case of an informal complaint, the ITW representative will record the relevant details, but will assure complainants that their identity will be kept confidential. The ITW rep or other designate will then initiate a conversation with the subject of the complaint and discuss with them the nature of the concern and possible ways to avoid the problem in the future.

F) Formal Complaint Process for Member Conduct at ITW events

1. In the case of a complaint that may involve criminal conduct, complainants will be advised of their options to report the matter to the appropriate law enforcement authorities but also assured that if they chose not to do so, that will not impact ITW's handling of the matter.
2. If a complaint is made during or immediately before an ITW event, the event director will have the authority to bar a subject from the event, pending the outcome of this process.
3. If the ITW rep deems it advisable, the complainant will be given the relevant resource package.
4. The complainant will be given the ITW Formal Complaint Information Sheet.
5. Once the ITW representative has secured all of the relevant information relating to the complaint, this will be turned over to the SSC, or an appropriate sub-committee for investigation.
6. The SSC will investigate the complaint in an expeditious manner, attempting to obtain:
 - a) All relevant witness information;
 - b) All relevant documents including electronic information;
7. The investigation will be conducted in a fair, balanced, objective, and non-leading fashion, and in a manner that does not interfere with any ongoing law enforcement investigations. Interviews will be conducted by an individual with appropriate background.
8. Once the SSC has completed their initial investigation, they will be asked to determine:

a) If there is a real and substantial possibility that the subject infringed the ITW Code of Conduct?

i) If so, then the SSC will write the subject with a summary of the relevant allegations and ask them for their written response and copies of any supporting documents, witness statements, or the identity of witnesses that might assist in shedding light on the matter, all to be delivered within fourteen days. The subject will be advised that if they fail to respond, the process will move ahead without their further participation. If the subject requests an extension of time to respond, the SSC may grant an extension if it is deemed appropriate.

ii) If not, the complainant will be advised that ITW could not move forward with the complaint due to a lack of evidence.

iii) If the subject fails to respond, the SSC will reconsider the evidence and then determine if, on the balance of probabilities, that there was an infringement of the ITW Code of Conduct. If so, the SSC will make a recommendation the member be disciplined and what form that discipline should take. If not, both the complainant and the subject will be advised that the complaint was found not actionable due to lack of evidence.

9. If the subject responds, the SCC may seek out any further evidence it deems relevant based on the subject's response.

10. Once the full investigation is completed, the SCC will determine if, on the balance of probabilities, the subject violated the ITW Code of Conduct. If so, the SCC will make a recommendation that the member be disciplined and what form that discipline should take. If not, both the complainant and the subject, will be advised that the complaint was found not actionable due to lack of evidence.

11. The SSC will report to the board on its fact finding and recommendations made in respect of all formal complaints that are processed. In cases where the SCC recommends that a member be barred from events, or has their membership revoked, the SCC shall recommend how long said action should last, and under what, if any, conditions a person shall be readmitted to events or the membership.

G) Complaint Process for Conduct at non-ITW Events

1. If ITW receives a complaint about the conduct of an individual which took place at a non-ITW event, the SSC rep will determine if the complaint is actionable or non-actionable.

2. If it is determined to be actionable, the SSC will investigate the complaint as if it were a formal complaint detailed above.

3. Once the investigation is complete (including subject's response if forthcoming), the SSC will determine:
 - a) On the balance of probabilities did the subject take actions which would constitute an infringement of the ITW Code of Conduct? If so;
 - b) Is there a real and substantial possibility the individual would infringe the ITW Code of Conduct if they attended future ITW events?
4. If both 3. a) and 3. b) are answered yes, then the SSC will make a recommendation as to what steps should be taken to reduce or eliminate this risk.
5. The SSC will report to the board on its fact finding and recommendations made on all complaints relating to non-ITW events that are processed.

H) Victim Impact Statements

1. In cases where the SCC determines that a violation of the Code of Conduct has occurred and a remedy will be recommended, the SSC, at its sole discretion, may request a Victim Impact Statement from the complainant or other victims. If the victim chooses to deliver such a statement it may include their opinion on an appropriate remedy for the violation, as well as detailing the impact that the impugned conduct has had on their life and well-being.

I) Communication of Results of Complaint Investigations

1. The full results of any complaint investigation will be reported to the subject promptly after board finalization of the results.
2. After the complaint process is finalized by the Board, the complainant will be advised if a finding that a Code violation was made, and if a remedy was imposed. If the remedy imposed includes the subject being barred from events or having their membership revoked, the complainant shall be advised of this as well.