



Union Water Supply System Inc.

Governance Committee Meeting

Wednesday, September 17, 2025
1615 Union Avenue, Ruthven
9:00am - 12:30 pm

AGENDA

- A. Call to Order
- B. Welcoming Remarks
- C. Adoption of the previous minutes
 - Minutes of Governance Committee Meeting of June 11, 2025
Pages 2- 4
- D. Report UWSS-GC/01/25 dated September 20, 2025 re: UWSS Inc. Administration Review of UWSS Inc. Restructuring/Governance Documents
 - Pages 5 - 9
- E. Policy Discussion
 - UW-A08-001 - Records Retention Policy - pages 10 - 33
 - UW-A15-001 - Privacy Policy - pages 34 - 38
 - UW-A21-001 - Accessibility Policy - pages 39 - 48
 - UW-B12-003 - Whistleblower Policy - pages 49 - 53
 - UW-H06-001 - Workplace Violence and Harassment Policy - pages 54 - 70
 - UW-H06-002 - Health and Safety Policy - pages 71 - 74
 - UW-H06-003 - Return to Work Policy - pages 75 - 82
- F. Comments, Announcements, and Other Business:
- G. Adjournment:
- H. Date of Next Meeting: To be determined.



**UWSS Inc.
Governance Committee
Meeting**

Wednesday, June 11th, 2025
10:00 am
Water Treatment Plant – Board Room

MINUTES

Directors: Kim DeYong (Chair)
Hilda MacDonald
Tom Kissner
John Tofflemire

Also in Attendance: Rodney Bouchard, Chief Executive Officer
For UWSS Inc. Khristine Johnson, Office Administrator (Recording Secretary)
Erin McKee, Human Resources Generalist (Guest)

Guests: William Willis – Legal Counsel, Willis Business Law (representing UWSS Inc.)
Will Goode, Manager of Municipal Services, Town of Kingsville

Call to Order:

The meeting was called to order at 9:59 AM by Chair Kim DeYong.

Welcoming Remarks:

Chair DeYong welcomed Kingsville's Manager of Municipal Services as a representative for the meeting.

Adoption of Previous Minutes:

Motion No. GC-05-25

Moved by: Director MacDonald
Seconded by: Director Kissner

That the minutes of the Governance Committee meeting held on April 16, 2025, be adopted as presented.

Carried

Review of UWSS Inc.'s Terms of Reference:

Chair DeYong led the discussion on proposed amendments to the Terms of Reference. The Committee considered revisions to clarify that meetings shall be held quarterly and that the CAO (or equivalent) shall be invited, with the agenda included in the invitation.

Motion No. GC-06-25

Moved by: Director Kissner
Seconded by: Director Tofflemire

That Section 3 of the Terms of Reference be amended to reflect quarterly meetings and that the CAO (or equivalent) shall be invited with the agenda attached.

Carried.

The Committee agreed that the Terms of Reference, including the approved amendments, would return for a final review before submission to the Board for approval.

Review of System Ownership – 4 Year Review of UWSS Inc. System Ownership:

Mr. Bouchard presented the draft report UWSS/07/25 dated June 6, 2025, which provides an update on UWSS Inc.'s shareholder interests. He also introduced a draft revision to Schedule C, clarifying system ownership and flow information to municipalities.

Motion No. GC-07-25

Moved by: Director Tofflemire
Seconded by: Director MacDonald

That the draft report and revised Schedule C be brought forward to the Board of Directors for consideration.

Carried.

Discussion on One-Year Review of UWSS Inc. General By-laws and Main Restructuring Documents:

Mr. Bouchard confirmed the documents had been previously circulated. Mr. Willis recommended a special Governance Committee session to properly review and identify amendments. It was discussed that shareholders should be invited to participate in the review, feedback should be collected in advance, and involvement from municipal administrators and councils is important.

Mr. Willis confirmed that this process aligns with good governance practices and supports effective shareholder engagement.

Motion No. GC-08-25

Moved by: Director MacDonald
Seconded by: Director Kissner

That shareholders be informed of a special Governance Committee meeting scheduled for September 17, 2025, and be invited to submit feedback in advance.

Carried.

Policy Review:

Mr. Bouchard confirmed that all new and revised policies will be submitted to legal counsel William Willis for review. Further discussion will occur at the next committee meeting.

Comments, Announcements, and Other Business:

Director MacDonald reported positive feedback from Mr. Bouchard's recent presentation to Leamington Council. The Committee discussed the possibility of implementing an annual shareholder report or presentation moving forward. The Annual Shareholders Meeting was scheduled for September 24, 2025, with proxies to be appointed accordingly. Mr. Bouchard raised the topic of an upcoming contract renewal for review. Chair DeYong noted the need for a more in-depth discussion regarding the Shareholder Agreement Review, which may be addressed in a future dedicated session. The Committee agreed that the Governance Committee Meeting scheduled for September 17, 2025, will be held from 9:00 AM to 12:30 PM, with refreshments to be provided.

Adjournment:

Motion No. GC-09-25

Moved by: Director Tofflemire
Seconded by: Director Kissner

That the meeting be adjourned.

Carried.

Time of Adjournment: 10:36 AM

Date of Next Meeting:

September 17, 2025 from 9:00 AM–12:30 PM to be held at the Ruthven Water Treatment Plant – Board Room

To: UWSS Inc. Governance Committee
From: Rodney Bouchard, UWSS Inc. CEO
Date: September 10, 2025
Re: UWSS Inc. Administration Review of UWSS Inc.
Restructuring/Governance Documents



Purpose:

To inform the UWSS Inc. Governance Committee that UWSS Inc. administration has completed its review of the UWSS Inc. incorporation and primary governance documents (the “restructuring documents”), and that this review did not identify any significant concerns requiring immediate action.

Further, to obtain the Governance Committee’s support for UWSS Inc. administration’s recommendation to the UWSS Inc. Board of Directors that a further review and revision of these documents with UWSS Inc. shareholders be undertaken in 2027, at which time UWSS Inc. will have been operational for three full calendar years.

Background:

UWSS Inc (or the Corporation) was incorporated on February 24th, 2023 as a Municipal Services Corporation under Ontario Regulation 599/06 of the Municipal Act, 2001. As part of the UWSS Inc. restructuring process, a number of documents were generated to set out the governance, management, administration and operation of the Corporation. These documents include but are not limited to the following:

- General By-Law No. 1;
- Shareholders Agreement;
- Water Service Agreement;

At the January 17, 2024 UWSS Inc. Board of Directors meeting, the Board approved UWSS Inc. Administration’s recommendation (Resolution No. UWSS-04-24) to implement a review of these primary restructuring documents following the 1-year anniversary of the transfer of UWSS assets from municipal ownership to UWSS Inc. Any proposed changes identified to these documents would be reported back to the UWSS Inc. Board and to the municipal shareholders. It is noted that the UWSS assets were transferred to UWSS Inc. ownership in April 2024.

Discussion:

As per UWSS Inc. Resolution No. UWSS-04-24, UWSS Inc. management implemented a review of the primary UWSS Inc. incorporation and restructuring documents following

Re: UWSS-GC/13/25 - UWSS Inc. Administration Review of UWSS Inc.
Restructuring/Governance Documents

the 1-year anniversary of the transfer of UWSS assets from the municipalities to UWSS Inc. The UWSS Inc. administration's review team included UWSS Inc.'s retained legal counsel, Willis Business Law.

The following documents were included in the review:

- Articles of Incorporation - Union Water Supply System Inc.
- General By-Law No. 1 for Union Water Supply System Inc.
- Unanimous Shareholder Agreement between UWSS Inc. and the municipalities of Essex, Kingsville, Lakeshore and Leamington (aka Shareholders)
- Water Services Agreement between UWSS Inc. and the Municipal Shareholders

The UWSS administrative review of the above-referenced UWSS Inc. restructuring documents identified a number of items that will need to be revised. However, the majority of the identified revisions are minor and do not affect the underlying purpose and "spirit" of the agreements. A more detailed summary of the administrative review is set out in Appendix A of this report.

It should be noted that any proposed revisions to these documents would need to be approved by the UWSS Inc. Board and then shared with the UWSS Inc. shareholders for their review and unanimous approval. The process and time to complete the review and revisions of these documents with UWSS Inc. shareholders would likely require 2-3 meetings between UWSS Inc. management and administration of the four municipal shareholders. This process would also necessitate a legal review of the documents by legal counsel of each of the four municipal shareholders. Based on these requirements, it is estimated that between 9-12 months would be needed to complete the full review and revision process for these documents.

It is UWSS Inc. management's opinion that the identified revisions do not warrant undertaking a full review and revision of these documents with UWSS Inc. shareholder municipalities at this time. This opinion is based on the following:

- The administrative review identified proposed revisions that are mostly minor and do not affect the purpose and "spirit" of the agreements.
- Undertaking a full review with the four municipal shareholders would likely take approximately 9-12 months to complete and would require significant effort by administration and senior management from each municipal shareholder.
- UWSS Inc. currently has a number of capital improvements and initiatives under way that will be completed in late 2026 and are likely to require further revisions to some of these restructuring documents.
- UWSS Inc. management would benefit from at least another full year of operation to evaluate any changes that may be needed to its governance, administration/operation, and collaboration with the shareholder municipalities.

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- Because the review and approval process requires resolutions of each shareholder council, conducting this process in 2026 risks overlap with the municipal election period. During an election year, councils may be in “lame duck” status and unable to approve significant governance changes, which could delay or undermine the process.

Accordingly, UWSS Inc. management recommends that a full review of UWSS Inc. restructuring documents with its municipal shareholders be initiated in early 2027. It is also recommended that regular reviews of the UWSS Inc. incorporation and restructuring documents be undertaken every five years thereafter.

Respectfully submitted,



Rodney Bouchard, CEO
Union Water Supply System Inc.

/kmj

Re: UWSS-GC/13/25 - UWSS Inc. Administration Review of UWSS Inc.
Restructuring/Governance Documents

Appendix A

Administrative Review of UWSS Restructuring Documents

1. Articles of Incorporation - Union Water Supply System Inc.

Review: The Articles were examined for compliance with the *Ontario Business Corporations Act* and alignment with UWSS Inc.'s purpose as a municipal services corporation.

Findings:

- The restrictions on business activities and share structure are consistent with the municipal ownership model.
- No substantive issues were identified.

Recommendation: No changes recommended at this time.

2. General By-Law No. 1 - Union Water Supply System Inc.

Review: The By-Law was reviewed to confirm consistency with governance best practices and the Unanimous Shareholders Agreement.

Findings:

- The process through which Municipal Shareholders may request or add agenda items to the Annual General Meeting could be strengthened. This would align with the guidance communicated in the July 16, 2025 shareholder letter and provide greater transparency and certainty for Municipal Shareholders in exercising this right
- At one AGM, quorum was not initially achieved, and a proxy had to be called in order to proceed. The current requirement of 100% shareholder presence for quorum may merit reconsideration. The Governance Committee may wish to discuss whether quorum should remain at 100% or be adjusted to three of the four shareholders being present in person or by proxy.
- Schedule "A," which sets out the system description, requires updating.
- Schedule "B," which sets out proportional shareholding, needs to be revised to reflect the January 1 redistribution. This update was made at the June 20, 2025 meeting and should be formally incorporated. The Committee may also wish to consider whether to adjust Schedule "B" to clarify how the Highbury Canco allocation is addressed.

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Recommendation: Amendments should be considered during the 2027 review to provide clearer shareholder rights at AGMs, refine quorum requirements, and ensure that Schedules “A” and “B” remain accurate and up to date.

3. Unanimous Shareholders Agreement - UWSS Inc. and Municipal Shareholders

Review: The Agreement was reviewed for consistency with By-Law No. 1 and for clarity regarding shareholder rights and obligations.

Findings:

- The Agreement remains effective in setting out shareholder governance and approval requirements.
- Timelines for certain reporting obligations under Article VII require clarification. Current practice has revealed that deadlines as written are not well aligned with actual reporting cycles, and refinements would improve consistency and predictability.

Recommendation: During the 2027 review, reporting requirements should be refined to reflect actual practice and ensure that timelines are achievable and enforceable.

4. Water Services Agreement - UWSS Inc. and Municipal Shareholders

Review: The Agreement was reviewed for alignment with UWSS Inc.’s operations and the relationship with municipal shareholders.

Findings:

- The Agreement effectively defines the commercial relationship between UWSS Inc. and the municipal shareholders.
- No material operational concerns were identified in this review.

Recommendation: A more detailed review is recommended during the 2027 restructuring review, particularly in light of the capital program and operational adjustments expected through 2026.

Summary

The administrative review confirms that the restructuring documents are functioning as intended. While each document could benefit from clarifications and technical updates, no significant concerns were identified that would warrant immediate amendment. A full review in 2027, after three years of UWSS Inc. operations, will provide the most productive opportunity for revisions.



Union Water Supply System Inc. Records Retention Policy

POLICY No: UW-A08-001

Date Adopted:

1.0 PURPOSE

This policy outlines the guidelines for the retention, management, and disposition of operational and governance records at Union Water Supply System Inc. ("UWSS Inc."). Effective records management is critical to ensuring compliance with regulatory requirements, supporting transparency and accountability, managing risk, preserving organizational knowledge, and enabling the continuity of services.

UWSS Inc. is committed to meeting its legal obligations under applicable Ontario legislation, including the *Municipal Act, 2001*, the *Safe Drinking Water Act, 2002*, the *Municipal Freedom of Information and Protection of Privacy Act*, and the *Archives and Recordkeeping Act, 2006*, among other relevant statutes and regulations.

2.0 LEGISLATION AND REGULATORY REFERENCES

- *Municipal Act, 2001*
- *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA)
- *Archives and Recordkeeping Act, 2006* (ARA)
- *Environmental Protection Act, R.S.O. 1990* (EPA)
- *Safe Drinking Water Act, 2002* (SDWA)
- Public Sector Accounting Board (PSAB) Standards
- Drinking Water Quality Management Standard (DWQMS)
- *Accessibility for Ontarians with Disabilities Act* (AODA)

3.0 RETENTION SCHEDULE

All records shall be classified and retained in accordance with the retention periods set out in Schedule "A" – Retention Schedule, which forms an integral part of this policy. The retention schedule is based on principles adapted to the specific needs of UWSS Inc. as a municipal corporation, ensuring records are maintained for the required duration to meet legal, regulatory, and operational needs.

- See Schedule A: Retention Schedule.

4.0 GUIDELINES

4.1 Records Management, Storage, and Retention

All records and documents stored on company property or company-issued devices must be handled with care and organized for easy access and reference.

Records are classified and stored according to their subject matter and are managed by the department most closely aligned with their content. Within each department, records are organized chronologically and by functional classification, in accordance with the approved retention schedule.

All records are safeguarded using appropriate physical and electronic protections to prevent loss, unauthorized access, or damage. Records must be retained for the period required by law, by operational need, and as indicated in the approved retention schedule. This retention applies to original documents or official copies with legal value (e.g., signed contracts or certified records).

4.2 Roles and Responsibilities

The most senior employee in each department is responsible for ensuring compliance with this policy within their area.

Role	Responsibilities
Office Administrator	Oversees records retention, compliance with this policy, supervises the final disposition of records, and coordinates periodic reviews of retention schedules.
Department Managers	Ensure department compliance with retention schedules and notify the Office Administrator when records are no longer needed.
Employees	Follow records management procedures, ensuring proper classification and handling.
IT/System Administrators	Maintain digital recordkeeping systems and support electronic records retention and secure disposition.

4.3 Copies

Only authorized individuals may create copies of official UWSS Inc. records. Unaltered copies that do not contain personal or confidential information may be discarded when no longer needed. Copies that have been annotated, altered, or otherwise modified must be retained alongside the original record until the full retention period has expired.

4.4 Personal Information

Records containing personal information are stored in a secure, digital environment, accessible only to authorized personnel. This environment is protected by strong passwords, encryption, and appropriate access controls to prevent unauthorized access or disclosure.

Personal information is retained in accordance with the General Regulation under the MFIPPA to ensure the individual it relates to has a reasonable opportunity to access it. Specifically:

- a) Personal information is retained for one year after use or for the period required by UWSS Inc. by-law or resolution, whichever is shorter.

- b) This retention period may differ if the individual consents to earlier disposal or if the information pertains to credit or debit card payment data, which may have stricter requirements.

After the applicable retention period ceases, personal information is destroyed promptly, safely, and securely in compliance with the Privacy Policy, using appropriate digital methods such as secure deletion and anonymization.

5.0 DISPOSITION OF RECORDS

Disposition refers to the process of securely destroying or archiving records that are no longer required to be retained under this policy or applicable legislation.

Acceptable methods of destruction include:

- a) Shredding – for physical (paper) records.
- b) Permanent deletion – from electronic systems, ensuring records are irretrievable.
- c) Secure redaction – of specific data fields, where only portions of a record are removed.
- d) Destruction by an approved third-party vendor – where contracted services are used, in compliance with security and confidentiality requirements.

All disposition activities must ensure that records containing confidential or personal information are destroyed in a manner that prevents unauthorized access or reconstruction.

5.1 Disposition Procedures

The Office Administrator or designated records management authority is responsible for overseeing the secure destruction of records in compliance with this policy and the ARA. Records eligible for disposition must be reviewed by the Office Administrator in consultation with relevant Department Managers.

- a) Records containing sensitive or confidential information must be securely destroyed by shredding or certified electronic wiping.
- b) A Disposition Log shall be maintained, including the record type, retention period, disposition date, method, and authorizing personnel.
- c) Permanent records will be archived for historical or legal reference.

5.2 Suspension of Disposition

The disposition of records must be suspended under the following circumstances:

- a) The records are subject to pending or reasonably anticipated litigation, investigation, audit, or a Freedom of Information (FOI) request.

- b) A legal hold has been issued by legal counsel or senior management.

Records under legal hold must not be altered, destroyed, or otherwise disposed of until the hold has been formally lifted, and written authorization has been provided to resume disposition.

6.0 REVIEW

To ensure ongoing compliance with legislative requirements and best practices, UWSS Inc. will conduct a review and audit of this policy and related practices every five years.

Each review ensures that:

- a) Records management practices meet current legislative standards;
- b) Company information is properly safeguarded;
- c) Recordkeeping costs are reasonable; and
- d) Document disposal is conducted responsibly and securely.

Record of Amendments

Version	Date	Amendment Description	Approved By
1.0		Initial policy approval and implementation	Board

Schedule A: Retention Schedule

GENERAL PROVISION:

The retention periods outlined in this schedule represent the minimum time records must be kept. Records may be retained longer if required for legal, audit, ongoing business needs, or other regulatory obligations.

LEGEND:

Retention:	The length of time a record is to be retained before its final disposition in years.
Permanent (P):	When a record is preserved and never destroyed. Permanent records are considered to be valuable or unique in documenting the history of an organization and for this reason, preserved indefinitely.
Superseded (S):	When a record becomes obsolete and/or is updated or replaced with a new version.
Event Trigger: (E+ # of years)	Refers to a specific event or action which initiates the calculation of a retention period (example: completion of a project).

PRIMARY HEADING: Administration

Includes records related to the internal management, office services, equipment and facility operations, telecommunications, records management, information systems, accessibility, and security that support the day-to-day operations of UWSS Inc..

Class Code	Secondary Heading	Retention Period	Event Trigger (E)	Reference
A00	Administration – General (Incl. general Administration records. Use only when no other headings apply)	2	N/A	Administrative practices and general office functions
A01	Associations & Organizations (Includes correspondence, minutes, agendas, notices & reports regarding organizations)	2	N/A	Membership, affiliation, and organizational records

	associations to which staff belong such as AMCTO, AMO, etc.)			
A02	Staff Committees and Meetings (Records, re: activities of staff committees and meetings, agendas, minutes, etc.)	2	N/A	Governance and internal meeting documentation
A03	Computer Systems Information (Incl. records, re: all types of information systems in use, hardware, software, quality control, email, etc.)	S + 6	Superseded	IT best practices and system updates (IT standards)
A04	Conferences and Seminars (Incl. invitations, agendas, records, approvals, for conferences, conventions, seminars, special functions attended by staff, travel arrangements, accommodations, and itineraries)	2	N/A	Event-related administrative records
A05	Consultants (Incl. proposals, correspondence, records, resumes, documents re: selection, appointment, and monitoring of consultants)	2	N/A	Routine consultancy and professional services
A06	Office Equipment & Furniture (Incl. purchase, maintenance, repair, and disposal documentation)	E	Disposal of item	Equipment lifecycle and disposal procedures
A07	Office Services (Incl. general office correspondence, administrative support records, office supplies procurement, and meeting scheduling)	2	N/A	General office management best practices and administrative support guidelines
A08	Records Management (Incl. policies, procedures, guidelines, and training materials)	S + 6	Policy updates	Records management best practices and compliance standards
A09	Records Disposition (Incl. records of destruction, transfer to archives, or final disposition of records)	P	N/A	Compliance with retention and disposition policies, the ARA, audit trail requirements, and legal documentation
A10	Telecommunication Systems (Incl. system configurations, maintenance logs, contracts, and user manuals)	S	Superseded	Telecommunication and IT system standards
A11	Travel and Accommodation (Incl. records regarding travel and accommodation arrangements, reservations, itineraries, maps,	2	N/A	Travel policy and administrative records

	rented vehicles, hotels, convention sites, and restaurants.			
A12	Uniforms and Clothing (Incl. any uniforms, or special clothing used by staff members)	S	Superseded	HR guidelines
A13	Vendors and Suppliers (Incl. records re: vendors and suppliers as well as information on goods & services i.e. catalogues, price lists, bids and correspondence.	2	N/A	Procurement policy
A14	Intergovernmental Relations (Incl. general records related to municipalities, and other levels of government)	5	N/A	Public relations standards
A15	Accessibility of Records (FOI Requests and Processing Records)	2	N/A	MFIPPA compliance
A16	Security Records (Incl. physical security reports, facility access logs, security system maintenance records, and incident reports)	5	N/A	Risk management practices, and facility security standards
A17	Facilities Construction and Renovation Records (Incl. project plans, contracts, inspections, permits, and warranties)	E + 6	Completion of project	Engineering standards, construction warranty periods, and risk management practices
A18	Architectural and Engineering Drawings (working and design drawing retained until replaced by final or updated version)	S	Superseded	Engineering standards and asset management practices
A19	Building and Property Maintenance (Inc. building repairs, maintenance logs, service reports, inspection certificates, repair records)	5	N/A	Maintenance best practices, risk management, and insurance compliance standards
A20	Setup Tests, Commissioning Records, and Equipment Manuals (Incl. records showing equipment setup and testing for operational use)	E + 1	Removal or decommissioning of equipment	Technical documentation and equipment lifecycle management
A21	Accessibility of Services (Incl. records related to accessibility of buildings, services and information to disabled persons, multi-year accessibility plan, efforts to remove barriers, and notice of availability of services)	5	N/A	AODA compliance

A22	Information Systems Production Activity and Control (Incl. Access records, system logs, security event logs, backup logs, etc.)	2	N/A	IT security policy, audit and compliance standards
A23	Access Control and Passwords (Incl. documents related to management and access to programs)	S	N/A	IT security standards and access control protocols
A24	Performance Management Quality Assurance Documents (Incl. QA policies, procedures, audit tools, and performance standards)	S	Superseded	Quality assurance standards, and performance management practices, and regulatory compliance (e.g. DWQMS)

PRIMARY HEADING: Board and Governance

Includes records documenting UWSS Inc.'s governance structure, Board and Committee operations, by-laws, elections, appointments, motions, reports, accountability practices, supporting legal authority, decision-making, and transparency.

Class Code	Secondary Heading	Retention Period	Event Trigger (E)	Reference
B00	Board and Committee Operations – General (Incl. general governance structure records. Use only when no other headings apply)	2	N/A	Legislative authority, governance policies
B01	By-Laws and Policies (Incl. final versions of the UWSS Inc. by-laws and amendments and attachments that are legally part of the by-laws. Also includes any background documentation required to explain or justify the By-Law)	P	N/A	Legislative authority, governance policies
B02	By-Laws Other Municipalities (Incl. final versions of by-laws of other municipalities)	S	Superseded	Reference use in comparative municipal governance
B03	UWSS Inc. Board Agendas (Incl. notice of meetings, agendas, and working notes)	P	N/A	Governance and decision-making history
B04	UWSS Inc. Board Minutes (Incl. minutes of the proceedings of Board Meetings including attachments to the minutes and voting records)	P	N/A	Legal and historical record of Board decisions
B05	Committee Agendas and Minutes (Incl. minutes of the proceedings of Committee Meetings)	P	N/A	Continuity of governance processes and decisions

B06	Elections (Incl. records documenting internal or board elections, incl. nominations, results, etc.)	E + 4	Completion of Election	Governed by corporate by laws, or governance policies
B07	Goals and Objectives (Incl. strategic plans, annual corporate goals, corporate business plans, annual review reports, capital improvement program goals, water quality improvement goals, governance improvement goals, etc.)	P	N/A	Strategic planning reference
B08	Motions and Resolutions (Incl. final versions motions and resolutions)	P	N/A	Legal documentation
B09	Motions and Resolutions – other Municipalities	2	N/A	Comparative - Administrative reference
B10	Reports to Board (Incl. reports and submissions provided to the Board of Directors)	P	N/A	Governance documentation and reporting to the Board
B11	Appointments to Boards and Committees (Incl. records re: appointments by Board to roles on committees)	P	N/A	Board composition and appointment records
B12	Accountability, Transparency, and Governance (Incl. compliance reports, codes of conduct, conflict of interest disclosures, governance framework policies, reports on public information access, or transparency initiatives)	2	N/A	MFIPPA compliance, best practices for governance and compliance

PRIMARY HEADING: Development And Planning

Includes records related to the planning, development, and expansion of UWSS Inc. operations. This includes environmental assessments, land use and site planning, resource studies, mapping, and development applications that support infrastructure and operational needs.

Class Code	Secondary Heading	Retention Period	Event Trigger (E)	Reference
D00	Development and Planning – General (Incl. general correspondence related to planning)	2	N/A	Administrative records

	initiatives, memos, meeting notes, staff reports, sketches, etc. Use only when no other headings apply)			
D01	Demographic Studies (Incl. census data, population growth projections, community profile reports, water demand forecasting schedules, trend reports, expansion studies, etc.)	P	N/A	Long-term planning reference
D02	Environment Planning (Incl. EAs, ECAs, or certificates of approval, reports on environmental risks, permits, water quality studies, etc.)	P	N/A	Environmental regulation
D03	Infrastructure and Resource Planning (Incl. records such as studies, reports, designs, technical data, planning documents related to the development, maintenance, and upgrading of physical infrastructure and natural resource use, e.g. water systems, conservation efforts, capital project planning, etc.)	10	N/A	Conservation and planning
D04	Official Plans and Amendment Apps. (Incl. municipal official plans, amendments that impact UWSS Inc. operations, infrastructure, or land use)	P	N/A	Legal land use record
D05	Severances (Incl. land severance applications, planning reports, survey plans and sketches, notices of decision and appeal documentation, land titles registration documents, legal correspondence, conditions of approval, etc.)	E + 6	Registration with Land Titles	Land use planning
D06	Site Plan Control (Incl. approved site plans and drawings, site plan control agreements, staff reports, engineering reviews final registration documents, etc.)	P	N/A	Zoning and planning
D07	Easements (Incl. easement agreements, notice of easement grant or termination, survey and legal description, correspondence,	E + 6	Termination of Right	Legal land right record

	registration conditions, documents related to removal or modification of easements)			
D08	Encroachments (Incl. encroachment agreements or permits, notice of encroachment or corrective actions, survey reports, property assessments, legal correspondence, documentation, records of appeal, etc.)	E + 6	Termination of Right	Legal land use record
D09	Annexation/Amalgamation (Incl. Official annexation or amalgamation agreements, municipal restructuring reports or studies, Provincial or Federal notices of approval or direction, Council resolutions, property and boundary adjustment plans, correspondence, records, legal documents, etc.)	P	N/A	Municipal restructuring
D10	Reference Plans (Incl. official reference plans, property survey maps, records of land subdivisions, land ownership documents, changes or amendments to existing reference plans, registration of reference plans, etc.)	P	N/A	Property and legal mapping
D11	Digital Mapping (Incl. GIS maps and spatial data layers, digital mapping files, records of GIS project reports and analysis, historical versions, etc.)	S	Superseded	GIS data handling
D12	Agricultural Development (Agricultural development plans and proposals, environmental assessments, studies, reports, correspondence, and planning reviews, etc.)	10	N/A	Land use and watershed planning
D13	Community Improvement (Incl. records, studies statistics, and background information on community development programs e.g. Ontario Neighborhood Improvement Programs, Community Area Improvement Programs, BIA, etc.)	E + 6	Completion of project	Municipal/community development planning policies
D14	Industrial/Commercial Development (Incl. records re: promotion and development of	10	N/A	Municipal, industrial development, or commerce policies and regulations.

	industry and commerce. Records incl. studies, statistics, projections, etc.)			
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PRIMARY HEADING: Environmental Services and Water Treatment Operations

Includes records regarding the provision of safe drinking water, regulatory compliance, and environmental stewardship at the water treatment facilities.

Class Code	Secondary Heading	Retention Period	Event Trigger (E)	Reference
E00	Environmental Services – General (Incl. general correspondence, internal memos, reports, and documentation related to environmental policies and initiated. Use only when no other headings apply)	2	N/A	Administrative reference
E01	Water Treatment Operations (Incl. Daily operational logs, shift reports, system process control records, checklists, communication related to operational procedures, etc.)	15	N/A	O. Reg. 128/04 (“Certification of Drinking Water System Operators and Water Quality Analysts” under the SDWA)
E02	Water Quality Testing and Monitoring (Incl. laboratory analysis reports, sampling plans and schedules, chain-of-custody documentation, adverse water quality incident reports (AWQI), internal logs, summary reports submitted to the MECP, etc.)	15	N/A	O. Reg. 170/03 (“Drinking Water Systems Regulation” under the SDWA)
E03	Environmental Audits and Assessments (Incl. internal and third-party environmental audit reports, risk assessments, compliance reviews, corrective action plans, environmental site assessments, audit checklists, communications with regulators, etc.)	E + 7	Completion of audit/report	MECP Guidelines
E04	Spill Reports and Incident Logs (Incl. detailed reports, internal and external	E + 7	Date of Occurrence	EPA

	incident logs, notifications to regulatory bodies, cleanup, containment, and remediation records, investigations or corrective actions, and related correspondence)			
E05	Utilities Consumption (Water, Hydro, Gas) (Incl. consumption record, monthly or quarterly utility billing statements, consumption tracking logs, reports, audits, assessments, energy efficiency program documentation)	5	N/A	Operational Metrics
E06	Sludge Management and Disposal (Incl. sludge disposal logs, records, waste manifest forms, disposal site records, documentation, assessments, and compliance reports)	E + 10	Date of Disposal	MECP regulations
E07	Operator Certifications and Training Records (Incl. copies of operator certification and licenses, training records, professional development logs, documentation of certification renewals/changes, performance evaluations, training course material, etc.)	E + 5	Expiry or termination of Cert.	O. Reg. 128/04 ("Certification of Drinking Water System Operators and Water Quality Analysts" under the SDWA)
E08	Ministry of Environment Compliance Approvals (Incl MECP compliance approval documents, permits, licenses, regulatory approvals, records related to approval/compliance, correspondence with MECP re: approval, reports and documentation submitted, etc.)	E + 2	Cease to apply	MECP Approvals
E09	Source Water Protection Planning (Incl. source water protection plans and assessments, risk assessments, studies, documents, reports related to quality	15	N/A	Clean Water Act

	protection measures, risk mitigation, correspondence with stakeholders, monitoring and reporting activities, etc.)			
E10	Energy Management (Incl. energy usage reports and consumption data, records related to energy audits/assessments, documentation related to energy-saving projects, regulatory compliance reports, correspondence with energy providers and stakeholders, etc.)	E + 7	End of reporting period	Energy Conservation Act
E11	Capital Projects – Environmental Impact (Incl. environmental assessments, impact studies, approval documents, environmental mitigation and management plans, correspondence with environmental consultants, agencies, stakeholders, final reports, etc.)	E + 6	Completion of project	Environmental Assessment Act
E12	Backflow Prevention and Cross-Connection (Incl. backflow prevention test reports, classification records, assessments/surveys, correspondence re: compliance with backflow prevention systems, records of corrective actions, etc.)	7	N/A	CSA Standards
E13	Maintenance and Calibration Logs (Incl. logs of routine maintenance performed, calibration records for instruments used in water treatment, documentation of repairs, reports on equipment performance and reliability, manufacturer's maintenance instructions/recommendations, certification records, records of any failures, etc.)	5	N/A	Quality Assurance
E14	Water Treatment Plant (Incl. records related to the design, construction, operation, and maintenance of drinking	P	N/A	Based on regulatory requirements (e.g., SDWA, O. Reg. 170/03) and internal operational needs.

	water treatment facilities. This may include operational plans, shift monitoring logs, inspection records, water meter registration data (where applicable), and point-of-entry treatment documentation.)			
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PRIMARY HEADING: Finance and Accounting

Includes records regarding the management of funds for the UWSS Inc., including financial reporting, payroll, procurement, capital infrastructure, grants, and all transactions related to water treatment operations.

Class Code	Record Type	Retention Period	Event Trigger (E)	Reference
F00	Finance and Accounting – General (Incl. records re: Finance and accounting which cannot be classified anywhere else.)	2	N/A	Administrative finance records
F01	Accounts Payable (Incl. records documenting funds payable by UWSS Inc., such as paid invoices, receipts, copies of cheques, rebates, reports, bills, fees, etc.)	E + 7	End of fiscal year	CRA standards
F02	Accounts Receivable (Incl. records documenting funds owing to UWSS Inc. such as invoices, billings, correspondence and supporting documentation)	E + 7	End of fiscal year	CRA standards
F03	Audits (Incl. records re: banking transactions, reconciliations, and deposit records)	7	N/A	PSAB Standards
F04	Banking (Incl. records related to banking transactions, relationships with banks, records, and reconciliations)	7	N/A	Financial reporting
F05	Budgets and Estimates (Incl. records related to the preparation, review, and approval of annual budgets and financial estimates for operational and capital expenditures)	7	N/A	Financial audit requirements and best practices in financial management.

F06	Assets (Incl. records related to the acquisition, maintenance, and disposal of assets)	E + 7	Disposal of asset	CRA guidelines on asset management and depreciation.
F07	Cheques (Incl. records related to issued cheques, including copies, bank records, and relevant documentation)	7	N/A	Financial records
F08	Employee and Board Expenses (Records documenting employee and board member expenses, including reimbursements, claims, and approvals)	E + 7	N/A	CRA and compensation record guidelines for employee expenses
F09	Financial Statements (Incl. Records related to annual and periodic financial statements for UWSS Inc.)	P	N/A	Core financial history and record of all UWSS Inc. financial activities
F10	Grants and Loans (Incl. Records related to grants and loans, including agreements, correspondence, and reports detailing terms, conditions, and repayments)	E + 7	End of fiscal year	Funding agreement terms
F11	Investments (Incl. Records related to investments, including purchase, sale, and income tracking of investments held by UWSS Inc.)	E + 7	Closure of account	Investment records
F12	Journal Vouchers (Incl. Records documenting journal entries and adjustments, including supporting documentation for each entry)	E + 7	End of fiscal year	Financial documentation
F13	Subsidiary Ledgers, Registers, and Journals (Incl. Records documenting journal entries and adjustments, including supporting documentation for each entry)	E + 7	End of fiscal year	Accounting documentation
F14	General Ledgers and Journals (Incl. core accounting records, general ledger and journal entries)	P	N/A	Core Accounting record

F15	Payroll (Incl. Records related to employee payroll, including pay stubs, tax forms, and deductions)	E + 7	End of fiscal year	CRA and HR Compliance
F16	Purchase Orders and Requisitions (Incl. records related to purchase orders, requisitions, and the approval process for acquisitions)	E + 7	End of fiscal year	Procurement process
F17	Quotations and Tenders (Incl. records related to quotations and tenders submitted or received during procurement activities)	7	N/A	Procurement and contract records
F18	Unsuccessful Bids (Incl. records related to receipts of payment for services, goods, or fees received by UWSS Inc.)	2	After the award of contract	Procurement policy
F19	Receipts (Incl. records related to receipts of payment for services, goods, or fees received by UWSS Inc.)	7	N/A	Financial planning
F20	Revenues (Incl. records related to revenue generation, including billing, income tracking, and receipts)	7	N/A	CRA compliance
F21	Tax Rolls and Records (Incl. records related to tax rolls and assessments for UWSS Inc.)	P	N/A	Legislative requirement
F22	Write-Offs (Incl. records documenting write-offs for bad debts or uncollectible funds)	7	N/A	Financial reconciliation
F23	Trust funds (project escrows) (Incl. records related to trust funds or project escrows, including agreements and financial transactions)	E + 7	Closure of account	Trust management and financial record-keeping guidelines
F24	Security Deposits (infrastructure work) (Incl. records related to security deposits for infrastructure work, including agreements and financial transactions)	E + 7	Closure of account	Financial and legal assurance related to infrastructure projects

F25	Working Papers (for plant audit) (Incl. working papers related to audits conducted at the water treatment plant, including supporting documentation and audit reports)	E + 2	After completion of audit	Audit documentation and financial reporting standards
F26	Reserve Funds (Incl. records documenting obligatory and/or discretionary reserve funds such as reserves for working funds, contingencies, future capital projects, and information systems, etc.)	E + 6	End of fiscal year	Financial management standards, and Reserve Fund policy

PRIMARY HEADING: Human Resources

Includes records regarding the water treatment facility's relationship with its employees, including staff management, training, recruitment, safety, and labor relations.

Class Code	Record Type	Retention Period	Event Trigger (E)	Reference
H00	Human Resources – General (general administrative records related to human resources activities that cannot be classified elsewhere)	2	N/A	Administrative reference
H01	Attendance & Scheduling (Incl. employee attendance, scheduling, leave records, attendance logs)	7	N/A	Operational requirements
H02	Benefits (Incl. health insurance, pension plans, and other employee compensation benefits)	P	N/A	Employee compensation records and benefits management
H03	Employee Records (Active/Retirees) (Incl. records documenting employment details, contracts compensation, job history, etc.)	P	N/A	Lifetime record
H04	Employee Records (Deceased) (Incl. employment history, death-related)	E + 5	Date of death	HR Documentation

	documents, and final settlements or benefits)			
H05	Employee Records (Terminated) (Incl. termination letters, exit interviews, and severance details)	E + 10	Termination date	ESA guidelines
H06	Health & Safety (Incl. WSIB compliance, MOL compliance, and workplace safety protocols)	P	N/A	WSIB, MOL compliance
H07	Employee Relations (Incl. grievance procedures, disciplinary actions, and employee relations.)	10	N/A	HR requirements
H08	Salary Planning (Incl. compensation strategies, adjustments, employee pay grid, etc.)	P	N/A	Compensation planning
H09	Recruitment (incl. unsuccessful applicants, job postings, interview notes, resumes, external staffing agency correspondence, etc.)	3	N/A	Hiring documentation
H10	Mandatory Training and Development (Incl. mandatory employee training, certifications, health and safety training, regulatory training, and license-related education.)	P	N/A	Certificates, Operator certification, health and safety training, regulatory training, license-related training.
H11	General Training and Development (Incl. general professional development, internal workshops, training sessions, etc.)	5	N/A	General professional development and internal workshops.
H12	Human Resource Planning (Incl. succession planning, executive placement, retirement programs, staff turnover rates, staffing level plans, employment equity, performance management, employee information reporting, and related records)	E + 1, Human Rights special program designation:	Day last Used	HR Planning and Human Rights code requirements

		minimum of 5 years		
H13	Job Descriptions (Incl. job descriptions and specifications, as well as background information used in their preparation or amendment)	S	Superseded	HR Planning, ESA, Human Rights Code compliance, OHSA
H14	Organizational Design (Incl. reporting relationships, reorganization, organization analysis, and charts)	S	Superseded	HR Planning
H15	Claims (Incl. Records relating to WSIB or insurance carriers for lost-time incidents, accidents, STD or LTD, accident notice and accident report)	E + 3 Hazardous exposure claims= 40 years or 20 years after the last record made	Resolution of Claim	WSIB guidelines, OHSA compliance
H16	Employee Grievances (Incl. records dealing with complaints filed such as the initial complaint, investigation reports, final resolution including arbitration and arbitration awards)	E + 3	Resolution of Claim	ESA, Human Rights Code, OHSA, Internal HR policies (i.e., Workplace Violence and Harassment Policy)
H17	Criminal Background Checks (Incl. listing any criminal code convictions that have not been pardoned for applicable existing or new employees, service providers, and volunteers)	E + 7	Date employee ceased to be employed by employer	Criminal Records Act, Human Rights Code, Employment Standards Act (ESA)
H18	Employee Medical Records (Incl. doctor's notes, correspondence, and health reports related to an employee's medical situation)	E + 3	When STD/LTD claims are resolved	Personal Health Information Protection Act (PHIPA), Human Rights Code, Employment Standards Act (ESA)

PRIMARY HEADING: Legal Affairs

Includes records regarding legal matters as well as contracts and agreements, insurance, real estate matters, and other legal compliance.

Class Code	Record Type	Retention Period	Event Trigger (E)	Reference
L00	Legal Affairs - General (Incl. legal records that cannot be classified elsewhere)	2	N/A	Routine matters
L01	Appeals and Hearings (Incl. records related to legal appeals and hearings, court proceedings, outcomes, etc.)	P	N/A	Legal decisions
L02	Claims Against UWSS Inc. (Incl. legal claims, disputes, and related documents)	E + 7	Resolution of claim and all appeals	Legal proceedings
L03	Claims By UWSS Inc. (Incl. lawsuits, or legal claims filed by UWSS Inc. in relation to disputes, damages, or other legal matters)	E + 7	Claim resolution and all appeals	Legal proceedings
L04	Contracts & Agreements (Incl. contracts, agreements, related legal documents entered into for services, products, and transactions)	P	N/A	Vital records
L05	Insurance Appraisals (Incl. appraisals of property for insurance purposes)	E + 15	Completion of updated appraisal	Risk management records
L06	Insurance Policies (Incl. vehicle, liability, theft, and fire insurance)	E + 15	Expiry of policy	Compliance and coverage documentation
L07	Land Acquisition and Sale (Incl. records re: real estate transactions and conveyance of land such as lot sales, alley closings, allowances, expropriation, leases, deeds, underground storage abandonment records, expropriation plans, purchase letters,, and appraisals)	P	N/A	Real estate transactions

L08	Legal Opinions and Briefs (Incl. legal opinions and briefs prepared by legal counsel regarding specific issues or by-laws)	S	Legal updates	Legal precedent
L09	Legal Precedents (Incl. judgements, decisions, legal precedents that affect or guide UWSS Inc.'s position in actual or potential legal matters)	S	N/A	Internal legal guidance
L10	Federal and Provincial legislation (Incl. Federal and Provincial Laws, Bills, and Regulations that affect or are of interest to UWSS Inc. or the Municipalities)	S	N/A	Maintained for reference and compliance purposes related to legislative matters impacting UWSS Inc..

PRIMARY HEADING: Media and Public Relations

Includes records regarding the UWSS Inc.'s communication with the public and media, including outreach, public awareness, and branding.

Class Code	Record Type	Retention Period	Event Trigger (E)	Reference
M00	Media and Public Relations – General (Incl. records regarding media and public relations that cannot be classified elsewhere)	2	N/A	Administrative reference
M01	Advertising (Incl. media campaigns, digital/print ads, and CASL consent records)	1	N/A	Canadian Anti-Spam Legislation (CASL), marketing and outreach documentation
M02	Ceremonies and Events (Incl. records related to planning and participating in official events, openings, and commemorations)	E + 5	Completion of Event	Event documentation and historical reference
M03	Charitable Campaigns/ Fundraising (Incl. records related to efforts for fundraising or third-party charitable causes)	1	N/A	Community support initiatives excludes donation receipts

M04	Visual Identity and Insignia (Incl. branding standards, logo design, signage, seals, and related materials)	S + 5	Superseded or last use	Corporate identity, and legal protection
M05	Website and Social Media Content (Incl. website snapshots, social media posts, and related public-facing online content)	S + 2	Superseded	Reference for continuity, accountability, and messaging consistency
M06	Public Relations and Awareness (Incl. outgoing messages of congratulations, support, welcome and internal/external communications)	5	N/A	Public engagement and community relations programs
M07	Intellectual Property (Incl. certificates, registrations, enforcement of copyrights, patents, and trademarks)	E + 5	Expiration or last use	Intellectual Property Law, legal protection of UWSS Inc. assets
M08	Media Releases (Incl. official statements issued to media outlets.)	2	N/A	Public communications
M09	Public inquiries (Incl. responses to routine questions from the public)	2	N/A	Routine correspondence
M10	Community Engagement (Incl. consultation records, feedback, outreach efforts to the public)	P	N/A	Public relations history
M11	Public Notices & Advisories (Incl. notices about services, water safety, disruptions, or legal requirements)	7	Issue date	Regulatory or legal obligation (e.g., SDWA)
M12	Educational Materials and Campaigns (Incl. materials promoting water conservation, safety, and responsible usage)	5	Completion of Campaign	Water safety and conservation outreach, public education efforts
M13	Stakeholder Communications (Incl. correspondence with partners, agencies, and key stakeholders)	7	N/A	Outreach to partners, accountability and external relations

PRIMARY HEADING: Vehicles and Equipment

Includes records regarding UWSS Inc. vehicles and equipment, including fleet, operational machinery, safety gear, and maintenance activities essential to water treatment operations.

Class Code	Record Type	Retention Period	Event Trigger (E)	Reference
V00	Vehicles and Equipment – General (Incl. records documenting removal or sale of vehicles from fleet)	2	Vehicle disposal	Vehicle lifecycle records
V01	Fleet Management (Incl. documents related to tracking, assignment, and maintenance of fleet vehicles)	E + 2	Termination of vehicles from fleet	Vehicle lifecycle records
V02	Mobile Equipment (Incl. records for mobile units incl. deployment and decommissioning)	E + 6	Decommissioning of equipment	Water treatment mobile units
V03	Protective Equipment (Incl. documentation on personal protective gear and safety equipment lifecycle)	E + 6	Disposal of equipment	PPE, confined space gear
V04	Equipment Set-Up and Test Records (Incl. records showing equipment setup and testing for operational use)	S	N/A	Operational readiness records
V05	Maintenance and Inspection Logs (Incl. logs of routine and scheduled maintenance activities, including safety checks)	5	Completion of maintenance	Includes safety checks, and calibration logs
V06	Equipment Manuals & Specifications (Incl. technical documentation for proper operation, maintenance, and repair of equipment)	Life of equipment	Disposal of equipment	Reference documentation for operation/repair



Union Water Supply System Inc. Privacy Policy

POLICY No: UW-A15-001

Date Adopted:

1.0 PURPOSE

Union Water Supply System Inc. ("**UWSS Inc.**") is committed to protecting personal information in compliance with the Municipal Freedom of Information and Protection of Privacy Act ("**MFIPPA**"). This policy outlines the standards for the collection, use, and disclosure of Personal Information by UWSS Inc..

2.0 DEFINITIONS

2.1 Commissioner: The information and privacy commissioner appointed under the *Freedom of Information and Protection of Privacy Act* ("**FIPPA**").

2.2 Personal Information: Recorded information about an identifiable individual, including:

- a) Information relating to the race, national or ethnic origin, colour, religion, age, sex, sexual orientation, or marital or family status of the individual;
- b) Information relating to the education or the medical, psychiatric, psychological, criminal, or employment history of the individual or information relating to financial transactions in which the individual has been involved;
- c) Any identifying number, symbol, or other particular assigned to the individual;
- d) The address, telephone number, fingerprints, or blood type of the individual;
- e) The personal opinions or views of the individual except if they relate to another individual;
- f) Correspondence sent to an institution by the individual that is implicitly or explicitly of a private or confidential nature, and replies to that correspondence that would reveal the contents of the original correspondence;
- g) The views or opinions of another individual about the individual; and
- h) The individual's name if it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.
- i) Personal Information does not include information about an individual who has been dead for more than 30 years or the name, title, contact information, or designation of an individual that identifies them in a business, professional, or official capacity.

2.3 Personal Information Bank: A collection of personal information that is organized and capable of being retrieved using an individual's name or an identifying number or particular assigned to the individual.

3.0 MFIPPA DESIGNATION & PRIVACY RESPONSIBILITY STATEMENT

In accordance with MFIPPA, the Chief Executive Officer ("**CEO**") has been designated as the Head of UWSS Inc. for the purposes of the Act.

The CEO is responsible for ensuring that UWSS Inc. complies with all provisions of MFIPPA, including:

- a) Managing requests for access to information;
- b) Overseeing the protection of Personal Information held by UWSS Inc.;
- c) Implementing privacy practices and policies;
- d) Ensuring employees are informed of their obligations under MFIPPA.

All inquiries or requests under MFIPPA should be directed to the attention of the CEO or their designated delegate.

4.0 COLLECTION

Authorized employees may collect Personal Information on behalf of UWSS Inc. in accordance with MFIPPA. Personal Information is collected directly from the individual to whom the information relates, except as allowed by MFIPPA. Where Personal Information is collected, the individual is informed of the legal authority for the collection, the purpose of the collection and how it will be used, and the contact information of a UWSS Inc. representative who can answer their questions about the collection.

4.1 Exceptions

Under MFIPPA, there are certain circumstances where Personal Information may be collected without providing notice to the individual.

UWSS Inc. may collect Personal Information without notice in the following situations, as permitted by MFIPPA:

- a) if the CEO may refuse to disclose the Personal Information under subsection 8 (1) or (2) (law enforcement) of MFIPPA, section 8.1 (*Civil Remedies Act, 2001*) or section 8.2 (*Prohibiting Profiting from Recounting Crimes Act, 2002*);
- b) the Minister of Public and Business Service Delivery waives the notice;
- c) providing notice would frustrate the purpose of the collection;
- d) providing notice might result in an unjustifiable invasion of another individual's privacy; or
- e) the collection is for the purpose of determining suitability or eligibility for an award or honor.

5.0 USE & DISCLOSURE

Personal Information collected by UWSS Inc. is used for the purpose for which it was collected, for a consistent purpose, or for specific purposes as consented to by the individual it relates to. If Personal Information is disclosed to UWSS Inc. in accordance with MFIPPA, it may be used for the purpose for which it was disclosed. UWSS Inc. discloses Personal Information in its custody or control in certain circumstances to other parties in accordance with MFIPPA.

UWSS Inc. takes all reasonable measures to ensure that Personal Information is not used or disclosed unless it is accurate and up to date.

6.0 PROTECTING PERSONAL INFORMATION

Personal Information may be stored in physical or electronic files. UWSS Inc. safeguards Personal Information from unauthorized access, disclosure, use, or modification and against theft or loss regardless of the format in which it is stored. Appropriate safeguards are put in place based on the sensitivity of the information.

Personal Information is protected through physical, organizational, and technical measures. Access to Personal Information is restricted to employees and other agents of UWSS Inc. who require the information to perform their job duties, and to those otherwise authorized by law. UWSS Inc.'s computer network systems and databases are secured by complex passwords. Physical files are kept in locked filing cabinets within locked rooms. UWSS Inc. ensures that employees who handle client's Personal Information are aware of and understand the importance of maintaining the confidentiality of such information.

7.0 RETENTION

Personal information is retained in accordance with the General Regulation under MFIPPA to ensure the individual it relates to has a reasonable opportunity to access their Personal Information. Personal Information is retained for one year after use or the period required by UWSS Inc. policy, whichever is shorter. This retention period differs if the individual to whom the Personal Information relates agrees to earlier disposal or if it is credit or debit card payment data. Once Personal Information is no longer required, it is destroyed promptly, safely, and securely.

8.0 ACCESS TO AND AMENDING PERSONAL INFORMATION

Individuals have the right to access their Personal Information held by UWSS Inc. Requests for access must be submitted in writing to the CEO and specify the request is being made under MFIPPA. The request must specify the Personal Information Bank or other location of the Personal Information and include the required fee as set out in the General Regulation. UWSS Inc. may require individuals pay this fee before providing access to the record.

UWSS Inc. responds to requests for access to Personal Information in writing within 30 days of receipt to inform the individual whether their request has been approved, in whole or in part, or denied, and provide the individual with access to the record as applicable. This period may be extended in certain circumstances in accordance with MFIPPA, and the individual will be informed in writing of the length and reason for the extension and informed that of their right to request the Commissioner to review the extension. Requests

for access may be refused in accordance with MFIPPA. Where a request is denied, a notice of refusal is provided explaining why it was refused.

If a request does not contain sufficient detail to obtain the Personal Information sought, UWSS Inc. will reach out to the individual to gather additional information. Where a request for access cannot be granted in full, UWSS Inc. provides as much information as possible while complying with MFIPPA.

If UWSS Inc. is not in possession of the Personal Information requested, the request may be forwarded within 15 days to another institution to determine whether it has the information in its custody or control. Within 15 days of receiving the request, UWSS Inc. provides written notice to the individual who submitted the request that it has been forwarded.

If an individual requests access to a record containing information that may affect the interests of other people or when the Personal Information requested may constitute an unjustified invasion of personal privacy, the affected individual is given notice that UWSS Inc. plans to disclose this record. The affected individual has 20 days to oppose this disclosure in whole or in part.

Where a request for access is fulfilled, the Personal Information is provided in a comprehensible form and in a manner that indicates the general conditions the Personal Information is stored in and how it is used. An individual is given a copy of the record unless it is not reasonably practicable to reproduce it, in which case they may be granted access to the original. If granted access to an original record, the individual may be required to view the record at UWSS Inc.'s premises and be required to show proof of identity before being given access. UWSS Inc. provides reasonable accommodation for individuals who attend at UWSS Inc.'s premises to view records where necessary and provides alternative formats of records where possible.

8.1 Corrections

If an individual finds an error or omission in their Personal Information, they may request a correction. If UWSS Inc. does not agree to the correction, the individual may require UWSS Inc. attach a statement of disagreement noting a correction was requested but not made. Where an individual requests a correction, UWSS Inc. notifies any party who has received the information within the previous year of the correction or statement of disagreement.

8.2 Appeals

Where a request for access or request for correction is denied by UWSS Inc., an individual may appeal the decision to the Commissioner by submitting a written request within 30 days after the denial of the request. This timeline may be reasonably extended to accommodate accessibility needs in accordance with the Accessibility for Ontarians with Disabilities Act, 2005. Individuals must pay the required fee set out in the General Regulation when making an appeal. UWSS Inc. complies with any order issued by the Commissioner in relation to appeals.

Record of Amendments

Version	Date	Amendment Description	Approved By
1.0		Initial policy approval and implementation	Board



Union Water Supply System Inc. Accessibility Policy

POLICY No: UW-A21-001

Date Adopted:

1. PURPOSE

Union Water Supply System Inc. (“**UWSS Inc.**”) is committed to ensuring equal access and participation for people with Disabilities. We are committed to treating people with Disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with Disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario’s accessibility laws.

UWSS Inc. is committed to meeting its current and ongoing obligations under the Ontario *Human Rights Code* (“**OHRC**”) respecting non-discrimination.

UWSS Inc. understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”) and its accessibility standards do not substitute or limit its obligations under the OHRC or obligations to people with Disabilities under any other law.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with Disabilities.

2. SCOPE

This policy outlines our commitment to providing a respectful, welcoming and inclusive environment to all individuals who seek the services we provide. All of UWSS Inc.’s employees are expected to comply with this policy when delivering services to our customers or conducting business on behalf of UWSS Inc.

3. DEFINITIONS

- 3.1 **Accessible Formats:** Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with Disabilities.
- 3.2 **Assistive Device:** Any medical device, Mobility Aid, communication aid, or other aid that is especially designed to assist a person with a Disability with a need related to their Disability.
- 3.3 **Communication Supports:** Captioning, alternative and augmentative Communication Supports plain language, sign language, and other supports that facilitate effective communications.

- 3.4 **Constructive Discrimination:** Also referred to as adverse effect, is discrimination that unintentionally singles out a particular group, resulting in unequal treatment.
- 3.5 **Conversion-ready:** An electronic or digital format that facilitates conversion into an acceptable format.
- 3.6 **Customer Service Standards:** The standards set out in Part IV.2 of O. Reg. 191/11.
- 3.7 **Disability(ies):** Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.
- 3.8 **Mobility Aid:** Any manual or electric wheelchair, scooter, boarding chair, walker, cane, crutch, prosthesis, or other aid that is specially designed to assist a person with a Disability with a need related to mobility.
- 3.9 **Regulated Health Professional:** a member of one of the following colleges:
- (a) College of Audiologists and Speech-Language Pathologists of Ontario
 - (b) College of Chiropractors of Ontario
 - (c) College of Nurses of Ontario
 - (d) College of Occupational Therapists of Ontario
 - (e) College of Optometrists of Ontario
 - (f) College of Physicians and Surgeons of Ontario
 - (g) College of Physiotherapists of Ontario
 - (h) College of Psychologists of Ontario
 - (i) College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario
- 3.10 **Service Animal:** An animal is a service animal for an individual with a Disability if:
- (a) It is readily apparent that the animal is used by the individual for reasons relating to his or her Disability; or
 - (b) The individual provides a letter from a Regulated Health Professional confirming that the individual requires the animal for reasons relating to their Disability.
- 3.11 **Support Person:** Another person who accompanies an individual with a Disability in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

4. TRAINING

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the OHRC that relate to persons with Disabilities.

In addition, we will train:

- (a) all persons who participate in developing UWSS Inc's policies; and
- (b) all other persons who provide goods, services or facilities on behalf of UWSS Inc.

Training of our employees on accessibility relates to their specific roles.

Training includes:

- (a) purpose of the AODA and the requirements of the Customer Service Standards;
- (b) our policies related to the Customer Service Standards;
- (c) how to interact and communicate with people with various types of Disabilities;
- (d) how to interact with people with Disabilities who use an Assistive Device or require the assistance of a service animal or a Support Person;
- (e) how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with Disabilities; and
- (f) what to do if a person with a Disability is having difficulty in accessing UWSS Inc.'s goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

5. EMPLOYMENT

UWSS Inc. makes every effort to identify, remove, and prevent barriers to employment by developing inclusive procedures that support and accommodate persons with Disabilities throughout the recruitment and employment process. Whenever a candidate requires accommodation to fully participate in the recruitment and selection process, or a current employee requires accommodation in the workplace, the corporation works with the individual to provide the necessary accommodations, up to the point of undue hardship.

5.1 Job Design

UWSS Inc. proactively conducts thorough job analyses to ensure that both new and existing job requirements are bona fide occupational requirements—reasonable and made in good faith. To determine whether a requirement is bona fide, UWSS Inc. considers the following:

- (a) The requirement is rationally connected to performing the job;

- (b) The requirement is adopted in good faith and serves a legitimate work-related purpose;
- (c) The requirement is reasonably necessary to accomplish a work-related task or process.

If a requirement is found not to be bona fide, UWSS Inc. evaluates whether reasonable accommodations can be provided to ensure equal opportunity in the workplace. UWSS Inc. is committed to ensuring that job design is non-discriminatory, including assessing job and work requirements for potential Constructive Discrimination.

5.2 Recruitment and Hiring

UWSS Inc. conducts recruitment and selection activities in a manner that ensures dignity and inclusion for all participants. UWSS Inc. notifies employees, job applicants and the public that accommodations can be made during recruitment and hiring. Additionally, UWSS Inc. notifies job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request.

Upon request, UWSS Inc. provides candidates with reasonable accommodations during the interview and selection process. UWSS Inc. works with the candidate to arrange suitable, personalized accommodations, such as providing the application in an alternate or Accessible Format.

UWSS Inc. is committed to making hiring decisions that are unbiased and based on qualifications and experience. The interview process focuses on assessing experience and skills and will not discriminate against candidates with Disabilities or those requiring accommodations—whether during the interview process or if accommodations are needed after hire. Successful candidates are informed of policies and available supports for accommodations upon completion of the recruitment process.

5.3 Training and Development

UWSS Inc. recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for all employees. To support this, all employees are equally considered for training opportunities, and UWSS Inc. does not discriminate against employees requiring accommodation when determining eligibility for training and development.

UWSS Inc. tailors training and development programs to meet the needs of employees with Disabilities, offering training as soon as reasonably practicable upon the assignment of applicable duties. These programs are designed with flexibility, allowing customization to accommodate the individual needs of employees, such as providing training materials in Accessible or Conversion-ready Formats. UWSS Inc. also considers potential barriers employees may face when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.

5.4 Emergency Response

If necessary or upon request, UWSS Inc. creates individualized workplace emergency response plans for employees with Disabilities. These plans are designed to address the unique challenges posed by the individual's Disability and the physical characteristics of the workplace and are developed in consultation with the employee.

In cases where an employee with a Disability requires assistance from a Support Person during an emergency, UWSS Inc. will designate a fellow employee, mutually agreed upon by the employee and UWSS Inc., to act in this role. This designated employee will receive first aid training and certification as needed to provide appropriate emergency support.

Customized emergency response plans are reviewed under the following circumstances:

- (a) When the employee relocates to a different physical location within UWSS Inc.
- (b) When the employee's overall accommodation needs or plans are reviewed.
- (c) When UWSS Inc. reviews its general emergency response policies.

5.5 Return To Work

UWSS Inc. offers a supportive return-to-work program and establishes processes to assist employees who have been absent due to a Disability and require accommodations to re-enter the workplace. In collaboration with the employee, UWSS Inc. develops an individualized return-to-work plan that supports the employee during the transition period by identifying and addressing any barriers.

The return-to-work process outlines the specific steps UWSS Inc. will take to facilitate the employee's return, including any accommodation needs tailored to the individual.

We have a separate written process for employees who have been absent from work due to a Disability and require Disability-related accommodations in order to return to work.

5.6 Accommodations

We notify staff that supports are available for those with Disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a Disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to Disability. We will consult with the person making the request in determining the suitability of an Accessible Format or Communication Supports specifically for:

- (a) information that is needed in order to perform the employee's job; and
- (b) information that is generally available to employees in the workplace.

We have a separate written process to develop individual accommodation plans for employees.

5.7 **Redeployment / Inability to Accommodate**

If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, UWSS Inc. will consider redeployment by placing the employee in an alternative position within UWSS Inc. Depending on the employees' needs, redeployment to an alternative position may be temporary or permanent. UWSS Inc. will work with management and the employee to determine whether there is another available and suitable position to accommodate the employees' needs. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

6. **CUSTOMER SERVICE**

6.1 **Access to Goods and Services**

UWSS Inc. is committed to providing barrier-free access to its goods and services for all customers. In cases where barriers cannot be removed, UWSS Inc. will offer alternative methods for accessing goods and services to the best of its ability.

6.2 **Service Animals**

We welcome people with Disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a Regulated Health Professional that confirms the person needs the service animal for reasons relating to their Disability.

If service animals are prohibited by another law, we will do the following to ensure people with Disabilities can access our goods, services or facilities:

- (a) explain why the animal is excluded; and
- (b) discuss with the customer another way of providing goods, services or facilities

6.3 **Support Persons**

UWSS Inc. welcomes individuals with Disabilities who are accompanied by a Support Person. If a person with a Disability is accompanied by a Support Person, UWSS Inc. ensures that both individuals can enter the premises together, and the person with a Disability is not restricted from having access to their Support Person.

UWSS Inc. does not charge admission fees for entry to its facilities or services. Accordingly, no admission fees apply to Support Persons.

Whenever possible, UWSS Inc. will make accommodations to allow the customer and their Support Person to sit together. In situations where confidential information may be discussed, consent will be obtained from the customer before sharing any potentially confidential details in the presence of the Support Person.

In certain cases, UWSS Inc. might require a person with a Disability to be accompanied by a Support Person for the health or safety reasons of:

- (a) the person with a Disability; and/or
- (b) others on the premises.

Before making a decision, UWSS Inc. will:

- (a) consult with the person with a Disability to understand their needs;
- (b) consider health or safety reasons based on available evidence; and
- (c) determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

If UWSS Inc. determines that a Support Person is required, we will waive the admission fee or fare (if applicable) for the Support Person.

6.4 Assistive Devices

People with Disabilities may use their personal Assistive Devices when accessing our goods, services or facilities.

In cases where the Assistive Device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a Disability can access our goods, services or facilities.

We ensure that our staff are trained and familiar with various Assistive Devices we have on site or that we provide that may be used by customers with Disabilities while accessing our goods, services or facilities.

7. COMMUNICATION

We have a process for receiving and responding to feedback and the process is accessible to persons with Disabilities upon request. We notify the public about the availability of Accessible Formats and Communication Supports by including a notice on our website, at public reception areas, and in written communications.

We communicate with people with Disabilities in ways that take into account their Disability. When asked, we will provide information about UWSS Inc. and its services, including public safety information, in Accessible Formats or with Communication Supports:

- (a) in a timely manner, taking into account the person's accessibility needs due to Disability; and
- (b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an Accessible Format or Communication Support. If UWSS Inc. determines that information or communications are unconvertible, UWSS Inc. shall provide the requestor with:

- (a) an explanation as to why the information or communications are unconvertible; and
- (b) a summary of the unconvertible information or communications.

We meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

7.1 Service Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of UWSS Inc. In the event of any temporary disruptions to facilities or services that customers with Disabilities rely on to access or use goods or services, customers will be promptly notified and reasonable efforts will be made to provide advance notice.

When disruptions occur, the UWSS Inc. will:

- (a) Post notices in the nearest accessible entrance to the service disruption;
- (b) Update the UWSS Inc. website, and applicable social media platforms with information about the disruption; and
- (c) Contact customers with reservations or appointments by any method that may be reasonable under the circumstances.

Notices under this section will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

7.2 Emergency Notifications

UWSS Inc. provides emergency and public safety information, plans, procedures, maps and warning signs at evacuation points, and any other emergency alert information in Accessible Formats or with appropriate Communication Supports, upon request. Alarm systems are both auditory and visual.

UWSS Inc. will:

- (a) Work with any individuals requesting information to best meet their needs;
- (b) Ensure emergency information can be seen, read, and heard by anyone, including people with Disabilities; and
- (c) If a person with a Disability requires assistance in an emergency, make sure an employee is available to assist.

8. FEEDBACK

UWSS Inc. acknowledges that customer and employee feedback is crucial in improving services, increasing clientele, reducing complaints, enhancing working conditions, and fostering a positive workplace culture, particularly regarding accessibility. UWSS Inc. ensures that individuals with Disabilities have various ways to provide feedback. Accessible feedback forms, along with alternative methods for submitting feedback, are available upon request.

Individuals who provide formal feedback will receive an acknowledgment of their submission, along with information regarding any actions taken in response to their concerns or complaints.

Feedback can be submitted by mail to:

Union Water Supply System Inc.

1615 Union Avenue

Box 340

Ruthven ON N0P 2G0

By Telephone:

519-326-1668

By Email:

HR@unionwater.ca

Feedback can be provided anonymously if desired, and feedback remains confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. The personal information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.

9. NOTICE OF AVAILABILITY OF DOCUMENTS

UWSS Inc. notifies the public that documents related to accessible customer service, are available upon request by posting a notice on its website.

UWSS Inc. will provide these documents in an Accessible Format or with Communication Support, on request. We will consult with the person making the request to determine the suitability of the format or Communication Support. We will provide the Accessible Format in a timely manner and, at no additional cost.

10. PROCUREMENT

We incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks. If it is not possible and practical to do so, we will provide an explanation upon request.

11. BUILDING ACCESSIBILITY

UWSS Inc. works to ensure that the built environment, including building interiors and exteriors, is designed to facilitate barrier-free access to goods, services, and employment for customers and employees. If areas of the built environment are not accessible for certain individuals with Disabilities, the organization will work with the individual to provide an alternate means of access up to the point of undue hardship.

Record of Amendments

Policy No: UW-A21-001

Version	Date	Amendment Description	Approved By
1.0		Initial policy approval and implementation	Board



Union Water Supply System Inc. Whistleblower Policy

POLICY No: UW-B12-003

Date Adopted:

1.0 PURPOSE

Union Water Supply System Inc. ("**UWSS Inc.**") is committed to maintaining a safe, ethical, and transparent workplace. This policy establishes clear standards and procedures for reporting, addressing, and investigating Wrongdoing or unethical conduct that may adversely affect the organization, its customers, shareholders, employees, investors, or the public.

2.0 DEFINITIONS

- 2.1 *Confidentiality*: The obligation to protect information from unauthorized disclosure. In the context of Whistleblower reports, this includes protecting the identity of the Whistleblower and any individuals involved, as well as the details of the report and the investigation process.
- 2.2 *Employee*: means, for simplification of the language in this policy, all union and non-union Employees.
- 2.3 *Good Faith*: The honest and reasonable belief that the information provided is true and that the report is made with sincere intentions, without malice, personal gain, or reckless disregard for the facts; however, a report does not have to be proven to be true to be in Good Faith. Good Faith is lacking when the report is known to be malicious or false.
- 2.4 *Reprisal (Retaliation)*: Actual or threatened suspension or firing, harassment, intimidation, coercion, or other negative impact on employment against a Whistleblower.
- 2.5 *Whistleblower*: An Employee - or other individual acting on behalf of UWSS Inc.- who, in Good Faith, reports suspected or actual Wrongdoing, misconduct, or violations of UWSS Inc. policy or applicable law within the organization.
- 2.6 *Wrongdoing*: Any activity that violates UWSS Inc. policy, legal or regulatory requirements, or ethical standards. Wrongdoing includes, but is not limited to, the following:
 - (a) Acts of fraud, falsification, or forgery;
 - (b) Theft from UWSS Inc, its customers, shareholders, Employees, investors, or the public;
 - (c) Offering or accepting bribes;
 - (d) Abuse of authority or position for personal gain;
 - (e) Conduct that endangers health and safety;
 - (f) Harassment, discrimination, or workplace violence;
 - (g) Causing risk or actual damage to property or the environment;
 - (h) Any other criminal or illegal activity; and

Policy No: UW-B12-00

- (i) Concealment of any of the above.

3.0 EXISTING POLICIES AND PROCEDURES

- 3.1 This policy is not intended to replace existing UWSS Inc's policies that have a process that should be referenced and followed to resolve related concerns.
- 3.2 UWSS Inc has established policies regarding expectations for Employee's conduct in the workplace, including:
 - (a) Workplace Violence and Harassment Policy
 - (b) Health and Safety Policy
 - (c) Accountability and Transparency Policy
 - (d) Conflict of Interest Policy
 - (e) Privacy Policy
 - (f) Procurement Policy
- 3.3 In the ordinary course, it is expected that concerns will be reported through normal reporting practices, policies and procedures outlined within each policy. If no such procedure exists or if the Employee is unsure, the concern should be reported under this policy.

4.0 REPORTING

- 4.1 Reporting Wrongdoings. Whistleblowers are encouraged to report any Good Faith concern in respect of a Wrongdoing. If a person witnessed or have reasonable grounds to suspects an inappropriate behaviour or activity that could show that a Wrongdoing has been committed, or is about to be committed, the person may report this in accordance with the process set out below.
- 4.2 Submissions of Allegations of Wrongdoing. Any person may submit a report verbally or in writing, on a confidential basis, detailing any concerns regarding a Wrongdoing. Such concern should be reported to the Chief Executive Officer (CEO) or their designate. If the CEO or designate is the individual accused of, or involved in, the alleged wrongdoing, the report should be directed to the Chair of the Board of Directors.
- 4.3 Reports should be made as soon as reasonably possible following the incident and should contain as much detail as possible including the following information:
 - (a) A description of the wrongdoing;
 - (b) The name of the persons involved;
 - (c) The date and time of the incident; and
 - (d) The names of any witnesses.
- 4.4 If the identity of the Whistleblower is known and additional details about the report are required to investigate, a follow-up discussion may be requested by Human Resources to gather these details.

- 4.5 Anonymous Reporting. Whistleblowers who wish to remain anonymous may:
- (a) Use a temporary or proxy email address,
 - (b) Report the concern through a trusted colleague, or
 - (c) Speak with a Supervisor or Human Resources Representative who is committed to maintaining Confidentiality.

In case of anonymous reporting, the seriousness of the allegation will, out of necessity, be determined based solely on the general merit and specific detail outlined in the disclosure. Follow-up for clarification and expansion of facts will not be possible, which may have the unintended consequence of limiting the effectiveness of any investigation or finding derived thereof.

In view of the investigation limitations, Whistleblowers considering an anonymous report under this section are encouraged to review Section 5 of this policy. UWSS Inc. clearly prohibits retaliation, discrimination and harassment against Whistleblowers who report, in Good Faith, what is reasonably believed to be a Wrongdoing, and is fully committed to the protections outlined Section 5 of this policy.

Notwithstanding the foregoing, this in no way interferes or limits the right of Whistleblowers who nevertheless choose to submit an anonymous report.

- 4.6 External Reporting. Nothing in this policy limits an Whistleblower's right to file a complaint with the Ontario Ministry of Labour, Immigration, Training and Skills Development, the Ontario Labour Relations Board, the Occupational Health and Safety Inspector, the Ontario Human Rights Commission, or any other appropriate regulatory or law enforcement body.
- 4.7 Fraudulent or Malicious Reports. It is a violation of this policy for anyone to knowingly make a false report of Wrongdoing. Unfounded or frivolous reports may cause both the individual accused and the company significant damage. Any Whistleblower who knowingly makes a false report will be subject to immediate disciplinary action.

5.0 INVESTIGATION

- 5.1 UWSS Inc. takes all Whistleblower reports seriously. Each report is thoroughly investigated as soon as reasonably practicable following receipt. Investigations are conducted by either an internal or external party, depending on the nature and complexity of the report, to ensure fairness and impartiality.
- 5.2 Every reasonable effort will be made to maintain Confidentiality throughout the investigation process in order to protect the identities of all individuals involved.
- 5.3 If the investigation concludes that workplace Wrongdoing has occurred, appropriate disciplinary action will be taken, in accordance with this policy, and legal action may be pursued where warranted.

6.0 PROTECTION FROM REPRISALS

- 6.1 Prohibition Against Retaliation, Discrimination and Harassment. UWSS Inc prohibits discrimination, harassment and/or retaliation against Whistleblowers who, in accordance with this policy, reports, in Good Faith, what they reasonably believe to be a Wrongdoing and any protected disclosures, regardless of whether the investigation substantiates the alleged Wrongdoing, provided the report was made in Good Faith.
- 6.2 Protection. UWSS Inc. is committed to not discharging, demoting, suspending, threatening, harassing, prejudicially modifying the relationship of, or otherwise discriminating or retaliating against a person in the terms or conditions of his/her employment or relationship with UWSS Inc. as a result of a disclosure that was submitted in Good Faith in accordance with this policy and without malice of forethought. Any act of retaliation—whether by the individual reported or by anyone acting on their behalf—will be treated as a serious violation of this policy and may result in disciplinary action, in accordance with this policy.
- 6.3 Reporting and Investigating Reprisal. A Whistleblower who believes that they are the subject of a Reprisal following a disclosure of Wrongdoing shall notify Human Resources immediately. An Employee informed of, or who becomes aware of a Reprisal against a Whistleblower, has a duty to notify Human Resources. Where Human Resources receives such disclosures, they will notify the CEO immediately and will undertake to ensure that the Whistleblower is protected from any further Reprisal. Allegations of Reprisal will be the subject of investigation.

7.0 CONFIDENTIALITY

- 7.1 The identity of individuals involved in an investigation, including the identity the Whistleblower and the identity of an individual alleged to have committed Wrongdoing, will be protected to the fullest extent possible.
- 7.2 The CEO, Chair of the Board of Directors, HR and all UWSS Inc.'s Employees, aware of or participating in an investigation of Wrongdoing shall treat all information received confidentially. All reasonable efforts will be made to maintain Confidentiality. Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know and such disclosures shall be restricted to what must be disclosed to ensure a thorough, effective and complete investigation or as otherwise required by law.
- 7.3 Breaches of Confidentiality may be regarded as serious misconduct and will be subject to legal action or disciplinary action, in accordance with this policy.
- 7.4 Disclosure of information is subject to the *Municipal Freedom and Protection of Privacy Act* (MFIPPA) and UWSS Inc.'s Privacy Policy.

8.0 Disciplinary Action

- 8.1 Employees who knowingly make a false or misleading statement; seek Reprisal against an individual as the result of a complaint; breaches Confidentiality; do not cooperate during the course of an investigation or complaint of retaliation; or against whom acts of

Wrongdoing are substantiated will be subject to disciplinary action, up to and including dismissal. Disciplinary measures will be determined on a case-by-case basis, taking into account the severity and circumstances of the offense.

Record of Amendments

Version	Date	Amendment Description	Approved By
1.0		Initial policy approval and implementation	Board



Union Water Supply System Inc.

Workplace Violence and Harassment Policy & Program

POLICY No: UW-H06-001

Date Adopted:

1.0 PURPOSE AND COMMITMENT

- 1.1. Union Water Supply System Inc. ("**UWSS Inc.**") is committed to a safe, productive, and respectful Workplace, free from Violence, Harassment, and Discrimination. Violations will be addressed promptly and appropriately.
- 1.2. UWSS Inc. upholds every Worker's right to a Workplace free from Violence, Harassment, and Discrimination, in accordance with the protected grounds under the Ontario Human Rights Code ("**OHRC**") and the Occupational Health and Safety Act ("**OHSA**").
- 1.3. UWSS Inc. neither condones nor tolerates any acts of Violence, Harassment, or Discrimination, whether by or against a Worker. This policy outlines UWSS Inc.'s commitment to preventing such behavior and includes clear procedures for addressing and investigating incidents.

2.0 PREVENTION STRATEGY

- 2.1. **Training:** Educating Workers on their rights and responsibilities regarding Workplace Violence, Harassment, and Discrimination, ensuring they understand UWSS Inc.'s policies and procedures.
- 2.2. **Clear Reporting Procedures:** Establishing an accessible, transparent, and impartial complaint process for reporting and addressing incidents of Violence, Harassment, and Discrimination.
- 2.3. **Proactive Monitoring:** Regularly identifying and addressing potential risks related to Workplace Violence, Harassment, and Discrimination, and taking steps to eliminate barriers to a safe and inclusive environment, especially concerning protected grounds under the OHRC.
- 2.4. **Early Intervention:** Encouraging Workers to report incidents promptly, followed by thorough investigations, to prevent escalation and address concerns before they become more serious issues.
- 2.5. **Workplace Culture:** Promoting professionalism, respect, and inclusive behavior across all levels of the organization to maintain a positive and supportive work environment.

3.0 SCOPE

- 3.1. This policy applies to all individuals associated with UWSS Inc., including full-time, part-time, probationary, and temporary Workers, contractors, consultants,

volunteers, and any other individuals interacting with UWSS Inc.'s staff, such as clients, visitors, or service providers. It covers all work-related activities, whether they occur on UWSS Inc. premises, at remote locations, or during work-related events, travel, or communications, regardless of location.

3.2. This includes, but is not limited to:

- (a) **Workplace Locations:** Any UWSS Inc. office, facility, or job site, whether permanent or temporary.
- (b) **Off-site Locations:** Any location outside UWSS Inc. premises where work-related activities occur, such as client meetings, inspections, or field operations.
- (c) **Work-related Social Events:** UWSS Inc. sponsored gatherings, team-building events, and similar activities involving Workers or associates.
- (d) **Virtual Workspaces:** Digital tools and platforms used for work, including video conferences, emails, chat platforms, and online collaboration tools.

4.0 DEFINITIONS

- 4.1. **Accommodation:** Modifications to Workplace policies or procedures to support individuals with disabilities or other protected needs under the OHRC.
- 4.2. **Bullying:** Repeated, unreasonable behavior directed at an individual or group that creates a risk to health and safety. It involves actions, words, or behaviors intended to intimidate, degrade, or humiliate another person, often leading to a harmful work environment. Bullying can be physical, verbal, or psychological and can be overt or subtle.
- 4.3. **Complainant:** The individual reporting an incident under this policy.
- 4.4. **Corrective Action:** Actions taken in response to complaints, such as disciplinary measures or Workplace adjustments.
- 4.5. **Discrimination:**
 - 4.5.1. Unfair or unequal treatment of individuals based on protected characteristics such as race, gender, disability, age, sexual orientation, and religion. It occurs when someone is treated less favorably than others due to these characteristics.
 - 4.5.2. In accordance with the OHRC, the following are prohibited grounds of Discrimination:
 - (a) Age
 - (b) Ancestry

- (c) Colour
- (d) Race
- (e) Citizenship
- (f) Ethnic Origin
- (g) Place of Origin
- (h) Creed (Religion)
- (i) Disability
- (j) Family Status
- (k) Marital Status (including single status)
- (l) Gender Identity
- (m) Gender Expression
- (n) Sex (including pregnancy and breastfeeding)
- (o) Sexual Orientation
- (p) Receipt of Public Assistance (only in housing)
- (q) Record of Offences (only in employment)

- 4.6. **Mediation:** A voluntary resolution process with a neutral third party.
- 4.7. **Reprisal/Retaliation:** Adverse actions taken against someone for reporting or participating in a Workplace complaint investigation.
- 4.8. **Respondent:** The person against whom a complaint is made.
- 4.9. **Vexatious:** Annoying, irritating, and distressing behaviour without a legitimate purpose. It includes offensive, embarrassing, humiliating, or demeaning words or actions towards a Worker in a Workplace. It also includes intimidating behaviour, isolating or discriminating against a Worker.
- 4.10. **Worker(s):** According to the OHSA, a Worker is: A person who performs work or services for monetary compensation, a secondary student who performs work or services for no monetary compensation as part of a work experience program approved by the school board, or post-secondary institution, or any other persons specified in legislation who perform work or supply services to an employer for no monetary compensation.
- 4.11. **Workplace:** Any location or situation where work is performed, including offices, job sites, remote locations, virtual Workspaces including but not limited to video conferences, emails, and online collaboration. It encompasses all activities related

to employment, such as training, meetings, and social functions, and may extend to any environment under the employer's control where work-related activities occur.

4.12. Workplace Harassment:

4.12.1. According to the OHSA, Workplace Harassment is defined as:

- (a) Engaging in a course of Vexatious comment or conduct against a Worker in a Workplace that is known or ought to be known to be unwelcome or
- (b) Workplace Sexual Harassment.

4.12.2. Harassment can take many forms and may include, but is not limited to:

- (a) *Verbal Harassment*: Offensive jokes, comments, or innuendos related to a person's race, gender, identity, disability, sexual orientation, age, or other protected grounds.
- (b) *Written Harassment*: Posting or circulating offensive material, including pictures, graffiti, or emails.
- (c) *Teasing or Bullying*: Humiliating or demeaning "teasing" based on protected characteristics (e.g., race, gender).
- (d) *Discriminatory Comments*: Ridiculing someone based on race, gender, age, sexual orientation, religion, or disability.
- (e) *Vandalism*: Damaging personal property based on someone's characteristics.
- (f) *Abuse of Authority*: Misuse of power to undermine someone's career or job performance.
- (g) *Sexual Harassment*: Unwelcome sexual advances or behavior, including touching, solicitation, or inappropriate conduct.
- (h) *Poisoned Work Environment*: Behavior that creates a hostile environment, such as spreading rumors or malicious gossip.

4.12.3. Workplace Harassment Does Not Include:

- (a) *Performance Management*: Feedback, discipline, and performance management are not considered Harassment if conducted professionally, fairly, and respectfully as part of a legitimate process aimed at improving performance or maintaining productivity.
- (b) *Good-Natured Banter*: Friendly behavior or banter is excluded if mutually consensual, respectful, and non-harmful, ensuring the policy does not interfere with normal Workplace interactions.

- (c) *Reasonable Management Actions*: Actions taken as part of management duties, such as directing employees or making organizational decisions, are protected under both the OHSA and the OHRC when performed reasonably and professionally.

4.13. Workplace Sexual Harassment:

- 4.13.1. Engaging in a course of Vexatious comment or conduct against a Worker in a Workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome; or
- 4.13.2. Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the Worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

4.14. Workplace Violence:

- 4.14.1. The definition of Workplace Violence under the OHSA is as follows:
 - (a) the exercise of physical force by a person against a Worker, in a Workplace, that causes or could cause physical injury to the Worker,
 - (b) an attempt to exercise physical force against a Worker, in a Workplace, that could cause physical injury to the Worker,
 - (c) a statement or behaviour that it is reasonable for a Worker to interpret as a threat to exercise physical force against the Worker, in a Workplace, that could cause physical injury to the Worker.
- 4.14.2. This definition of Workplace Violence is broad enough to include acts that would constitute offences under Canada's Criminal Code.
- 4.14.3. Examples of Workplace Violence:
 - (a) Hitting or pushing a Worker;
 - (b) Verbally threatening to physically injure a Worker;
 - (c) Threatening notes or emails;
 - (d) Shaking a fist at a Worker;
 - (e) Using a weapon;
 - (f) Sexually assaulting a Worker; and
 - (g) Attempting to run down another employee using a vehicle.

(h) Domestic violence can also become Workplace Violence.

5.0 PROHIBITED CONDUCT

5.1. UWSS Inc. will not tolerate or condone Harassment or Discrimination by, or to its Workers.

6.0 RESPONSIBILITIES

6.1. Employer's Responsibility

6.1.1. UWSS Inc. is dedicated to safeguarding the well-being of all Workers by taking reasonable steps to prevent Workplace Harassment and Violence. UWSS Inc.'s responsibilities include:

- (a) Take every reasonable precaution to protect Workers from Workplace Violence, Harassment and Discrimination;
- (b) Provide information, instruction, and supervision to Workers to protect their health and safety as they relate to Workplace Violence and Harassment;
- (c) Conduct a Workplace Violence risk assessment and implement measures to identify risks;
- (d) Inform Workers of any person with a history of Violence they may encounter while at work;
- (e) Develop and regularly review a written policy on Workplace Violence and Harassment in consultation with its employees;
- (f) Establish liaison with local law enforcement authorities and legal counsel relative to handling of Violence and threats of Violence.
- (g) Investigate all incidents and complaints for Workplace Violence and Harassment; and
- (h) Provide appropriate training regarding Workplace Violence and Harassment measures.

6.2. Workers' Responsibility

6.2.1. All Workers are expected to contribute to a safe and respectful work environment by:

- (a) Work in compliance with all applicable legislation and all policies and procedures related to Workplace Violence and Harassment prevention;
- (b) Report all instances of Workplace Violence and Harassment they become aware of to their supervisor or management;

- (c) Respect the confidentiality of anyone involved in a Harassment complaint; and
- (d) Never subject another individual to any act of Violence, Harassment or Bullying as related to Workplace activities and to avoid responding negatively to such acts or circumstances.

6.3. Supervisors' Responsibility

6.3.1. Supervisors play a key role in preventing and addressing Workplace Harassment and Violence. Their responsibilities include:

- (a) Advise Workers of all potential or real hazards and dangers they are aware of involving Workplace Violence and Harassment, including providing Workers with information related to a Workplace Violence risk from persons with a history of violent behaviour;
- (b) Provide Workers with written instruction when necessary to prevent Workplace Violence and Harassment;
- (c) Set an example for appropriate Workplace behaviour;
- (d) Deal with situations of Harassment immediately upon becoming aware of them, whether or not there has been a complaint;
- (e) Participate in and initiate an investigation under this policy when necessary; and
- (f) Take every reasonable precaution to protect Workers from Workplace Violence and Harassment.

7.0 COMPLAINT/INCIDENT PROCEDURE

7.1. Every Worker is obligated to promptly report acts of conduct that are or appear to be inconsistent with this policy. For any Harassment, Discrimination, or Violence, the *Workplace Violence & Harassment Incident Report* should be filled out. Confidentiality will be maintained to the greatest extent. See "Appendix A" for the form. The complaint should be made as soon as possible after the incident.

7.2. **Informal Resolution between Workers.** Workers who feel they have been the target of offensive behaviour are encouraged as an initial step to raise their concern with the Respondent either in person, by phone or in writing. This step is only suggested if the Worker feels comfortable to do so. UWSS Inc. supervisors or human resources staff can support the Worker to prepare for this conversation and can act as an informal mediator for both parties.

Often, the Respondent may not be aware that their behaviour is unwelcome. A clear message to them may stop the behaviour. If the complaint is not resolved at this

stage, UWSS Inc. asks its Workers to initiate a formal complaint under subsection 7.3 of this policy.

7.3. Formal Complaint. Workers may initiate the written complaint process at any time by submitting a written complaint using the form attached at Appendix “A” to this policy.

7.3.1. Formal complaints should be made as soon as possible after the date of the alleged incident. Timely filing will allow for a proper investigation while the events are still fresh in the minds of witnesses and will ensure a timely resolution.

7.3.2. Complaints can be submitted to a supervisor or the Human Resources Generalist. If the complaint involves the supervisor or the CEO, it should be submitted directly to HR. If the complaint involves HR, it can then be submitted to the CEO.

7.3.3. The Formal Complaint Process applies when:

- (a) an issue cannot be resolved informally under section 7.2 of this policy;
- (b) the Complainant chooses a formal complaint;
- (c) the Supervisor deems it necessary; or
- (d) the CEO, HR and/or legal counsel determines that an investigation into Workplace Violence, Harassment, or Discrimination is warranted, even without a formal complaint.

7.3.4. Formal Process for Addressing Complaints:

- (a) Upon receiving a complaint, UWSS Inc. will acknowledge receipt and provide a timeline for investigation.
- (b) Complaints against senior staff may result in the appointment of an external investigator.
- (c) The investigation will begin promptly, reviewing relevant evidence (emails, recordings, witness statements) and interviewing the Complainant, Respondent, and witnesses.
- (d) All parties (investigator, Complainant, Respondent) must disclose any potential conflicts of interest. If impartiality is in question, an external investigator may be appointed.
- (e) Interim measures (e.g., suspension or transfer) may be considered as necessary during the investigation.

7.3.5. Prior to interim measures, the Investigator will consider:

- (a) Risk of harm to the Worker or others;

- (b) Worker ability to perform duties;
- (c) Impact on the investigation;
- (d) Reputational risks to UWSS Inc.;
- (e) Effects on involved Workers; AND
- (f) Available alternatives.

7.3.6. The Investigator will:

- (a) Complete the investigation in a timely manner, generally within thirty (30) days, unless the circumstances warrant a longer investigation keeping the Respondent and Complainant informed of relevant timeline;
- (b) Conduct the investigation impartially, maintaining confidentiality;
- (c) Document meetings and interviews;
- (d) Notify Respondent(s) and schedule interviews;
- (e) Interview witnesses and secure evidence; and
- (f) Prepare a written report with findings, including whether violations occurred and any recommendations.

7.3.7. After the investigation, both parties will receive a written summary of the findings and any Corrective Actions within ten (10) days. The investigation report will not be shared unless required by law.

(a) No Misconduct Found:

- (i) If the findings do not support a complaint of Workplace Violence, Harassment, or Discrimination, no Corrective Action will be taken.
- (i) If no violation is found but other performance issues arise, non-disciplinary actions (e.g., education or training) may be recommended.

(b) Misconduct Found

- (i) If the findings indicate a criminal offense, the matter will be referred to law enforcement.
- (i) Disciplinary actions may include warnings, training, suspension, or termination, depending on the severity.
- (i) Support for the Complainant, such as counseling or Accommodations, may be offered.

- (i) Mediation or conflict resolution services may be offered to resolve the issue amicably.

- (c) Additional administrative actions may be taken to prevent similar incidents in the future.

7.4. Mediation. When appropriate, a third-party facilitator may assist in resolving complaints through voluntary Mediation. Mediation does not replace the UWSS Inc.'s obligation to investigate Workplace Violence, Harassment, or Discrimination as required by this policy or law.

7.4.1. HR will help identify suitable mediators.

7.4.2. If Mediation successfully resolves the issue to the satisfaction of all parties and UWSS Inc. the complaint process ends. A record of the settlement will be maintained by HR.

7.5. Malicious and Frivolous Complaints. Malicious complaints are considered a contravention of this policy. Should UWSS Inc. find that a complaint is malicious or frivolous, it may take appropriate disciplinary action against the Complainant.

7.6. Retaliation. Retaliation or threats of Retaliation toward anyone involved in a complaint investigation is viewed as a violation of this policy. Investigation of such behaviour will occur and appropriate disciplinary action taken, up to and including termination of employment.

7.7. Confidentiality and Co-operation.

7.7.1. All parties involved in the resolution or investigation of a complaint, including the Complainant, the Respondent, and witnesses, are expected to facilitate the process, co-operate and maintain confidentiality.

7.7.2. All documentation involved in the complaint process, including the final report, will be maintained in confidence. Disclosure will only occur as necessary for the investigation, as required to take Corrective Action or as required by law.

7.7.3. Personal information will be handled in accordance with the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and applicable privacy laws.

7.7.4. In all instances, such documentation will be kept separate personnel files. If there is disciplinary action, the reason for discipline, as well as the nature of the discipline will be recorded in a Worker's personnel file.

7.7.5. Unauthorized disclosure of confidential information may result in disciplinary action, up to and including termination of employment.

8.0 RISK ASSESSMENT & DISCLOSURE

- 8.1. UWSS Inc. conducts a risk assessment of the work environment to identify potential risks that could affect the organization, and the health and safety of Workers and institutes measures to eliminate or control any identified risks to Worker health and safety.
 - 8.1.1. The following factors are considered during the assessment:
 - (a) Past incidents of Violence;
 - (b) Violence that is known to occur in similar workplaces;
 - (c) The circumstances in which work takes place, including the type of work and conditions of work;
 - (d) The interactions that occur in the course of performing work; and
 - (e) The physical location and layout of the Workplace.
 - 8.1.2. The risk assessment may include reviews of records, security reports, Worker incident reports, staff perception surveys, health and safety inspection reports, first aid records, or other related records. Areas that are considered and may contribute to the risk of Violence or Harassment include but are not limited to contact with the public, exchange of money, receiving doors, and working alone or at night.
 - 8.1.3. The UWSS Inc. provides its employees with a written copy of the assessment and advises them of the results.
 - 8.1.4. UWSS Inc. reassesses risks as often as necessary to ensure the related program and policy protect Workers from Workplace Violence and Harassment. A written copy of the re-assessment is also provided to its employees.
 - 8.1.5. UWSS Inc. discloses information to Workers who are likely to encounter a person with a known history of Violence in the performance of their job duties, or if there is a potential risk of Workplace Violence as a result of interactions with the person with a history of Violence. However, UWSS Inc. only discloses personal information that is deemed reasonably necessary to protect the Worker from physical harm.

9.0 CONTROL MEASURES & PROCEDURES

- 9.1. The following measures have been implemented to eliminate or reduce the identified risks of Workplace Violence:
 - 9.1.1. **Workers Training Programs:** Regular training on identifying, preventing, and responding to Workplace Violence or Harassment.

- 9.1.2. **Clear Anti-Harassment and Violence Policies:** Development and communication of comprehensive anti-violence and anti-harassment policies that outline unacceptable behaviors and the consequences of violations. Policies are regularly reviewed and updated to ensure they stay relevant and effective.
- 9.1.3. **Reporting Mechanisms:** A confidential and accessible reporting system for Workers to report incidents of Violence or Harassment without fear of Retaliation with the option of anonymous reporting.
- 9.1.4. **Employee Support Services:** Employee Assistance Programs (EAP) providing counseling and support services to Workers affected by Workplace Violence or Harassment. Access to mental health support and conflict resolution services.
- 9.1.5. **Physical Environment Changes:** Introduction of electronic badge access to restricted areas to ensure only authorized personnel enter sensitive or high-risk zones. Visitor check-in procedures are also enforced, requiring all non-workers to sign in while on-site. Improved lighting in parking lots, hallways, stairwells, and common areas to ensure visibility and increase safety, particularly for Workers working late or during off-hours.
- 9.1.6. **Employee Roles and Responsibilities:** Clear job descriptions and delineation of roles to reduce conflicts arising from unclear expectations.
- 9.1.7. **Security and Monitoring Systems:** Installation of security cameras in strategic areas, such as entrances, parking lots, and hallways, to monitor activity and deter potential threats of Workplace Violence or Harassment.
- 9.1.8. **Alternative Dispute Resolution:** Mediation services offered to resolve conflicts between Workers before they escalate into Workplace Violence or Harassment. Procedures for addressing grievances and conflicts in a constructive and non-confrontational manner.

10.0 IMMEDIATE ACTION FOR VIOLENCE OR CRIMINAL OFFENCES

10.1. The following measures and procedures should be followed when an incident of Violence has occurred or is likely to occur and immediate assistance is required:

- (a) **Call Emergency Services (911):** If Violence occurs or criminal behavior is suspected (e.g., sexual assault), immediately contact emergency services by dialing 911.
- (b) **Ensure Safety:** Prioritize the safety of all individuals involved. Move people out of danger if possible.
- (c) **Preserve Evidence:** Avoid disturbing the scene to preserve critical evidence.
- (d) **Provide Support:** Offer support to the victim but avoid pressing them for details. Reassure them that help is on the way.

- (e) **Alert Supervisors:** Notify your supervisor or relevant personnel after contacting emergency services.

11.0 DOMESTIC VIOLENCE

11.1. If UWSS Inc. becomes aware that domestic violence may pose a risk of physical harm to a Worker at the Workplace, we will take all reasonable precautions to ensure their safety.

11.1.1. Workers who believe domestic violence could affect the Workplace should report their concerns promptly to their supervisor. This applies to:

- (a) Workers who are experiencing domestic violence.
- (b) Workers who suspect a co-worker may be affected.

11.1.2. Supervisors who are aware of a potential domestic violence risk must immediately report it to HR for further evaluation and action.

11.1.3. Upon receiving a report, HR, in collaboration with relevant parties, will:

- (a) Assess whether there is an immediate danger.
- (b) Conduct a Workplace threat assessment.
- (c) Evaluate the risk of Workplace Violence.
- (d) Develop, implement, monitor, and document a safety plan.

11.1.4. If a Worker and their spouse work together at UWSS Inc., we will take all necessary actions to address and prevent abusive behavior under this policy. This includes ensuring a safe, respectful work environment, implementing appropriate interventions, and providing support to affected Workers. UWSS Inc. is committed to maintaining a Workplace free from Harassment, intimidation, or Violence, regardless of personal relationships.

12.0 RECORDKEEPING

12.1. UWSS Inc. will securely maintain the confidential records of Workplace Violence, Harassment, and Discrimination complaints and investigations in HR, including:

- (a) Complaint details.
- (b) Investigation records and notes.
- (c) Investigation Report (if applicable).
- (d) Summary of findings and reports shared with involved parties.
- (e) Any Corrective Actions taken.

12.1.1. Personal information will be handled according to this policy, and any other applicable policies guidelines, and laws.

12.1.2. No documentation will appear in the Worker's personnel file unless there is a finding of misconduct.

13.0 TRAINING

13.1. UWSS Inc. ensures all Workers are trained on Workplace Violence and Harassment, with clear understanding of their roles, responsibilities, and this policy. A copy of the policy is also made available to all Workers.

13.2. Workers and supervisors involved in handling complaints will receive appropriate training in Workplace Violence, Harassment, and Discrimination, including investigative techniques.

13.2.1. UWSS Inc. provides Workers with training and education which include:

- (a) Recognizing potentially violent situations.
- (b) Procedures, practices, administrative arrangements, and controls to mitigate risks.
- (c) Appropriate responses to incidents of Violence and Harassment, including how to get help.

14.0 RESOURCES & SUPPORT SERVICES

14.1. Workers affected by Workplace Violence, Harassment, or Discrimination have access to a range of resources and support services, including:

- (a) **Employee Assistance Programs (EAPs):** Confidential counseling and mental health services. For more details or to access this program, contact HR.
- (b) **External Support Services:** Counseling, legal advice, and support groups to help individuals cope with the emotional and psychological impacts of such incidents.
- (c) **Benefits Program:** Coverage for medical or psychological services needed due to Workplace incidents, including therapy or rehabilitation.

15.0 REVIEW

15.1. UWSS Inc. in consultation with its employees will review and update this policy annually or sooner if Worker health and safety circumstances change. Any updates will be communicated to Workers, and an updated copy will be provided. The review process ensures the policy addresses emerging trends in Workplace Violence, Harassment, and Discrimination. The Human Resources Generalist, or designated personnel, is responsible for the policy's implementation, including training, awareness campaigns, and consistent application across all departments. Updates will be made as needed to reflect legal or organizational changes.

15.1.1. UWSS Inc. will promote awareness of Workplace Violence, Harassment, and Discrimination by:


- (a) Providing digital access to the policy.
- (b) Keeping printed copies available in HR.
- (c) Informing Workers about policy changes.
- (d) Offering training for all staff, including supervisors.

15.1.2. Further assistance or information regarding the complaint process, or the UWSS Inc. Workplace Violence and Harassment Policy & Program can be provided by contacting Human Resources.

Record of Amendments

Version	Date	Amendment Description	Approved By
1.0		Initial policy approval and implementation	Board

APPENDIX "A"

		Union Water Supply System Inc. WORKPLACE VIOLENCE & HARASSMENT INCIDENT REPORT	
Supervisor:		Investigator:	
Date Received: Initials:		Date Received: Initials:	
Report Submitted by:			
Report Submitted to:			
Date of Report:	Incident Date & Time:	Incident Location:	
Type of Incident: (Please check all that apply)			
<input type="checkbox"/> Threats	<input type="checkbox"/> Intimidation/ Bullying	<input type="checkbox"/> Physical Assault	<input type="checkbox"/> Other (Specify)
Communicated directly to victim: <input type="checkbox"/> Verbally <input type="checkbox"/> In Writing	Engaging in actions intended to frighten, coerce, or induce duress <input type="checkbox"/>	Hitting, fighting, pushing, or shoving <input type="checkbox"/>	Use of objects as weapons (Specify) <input type="checkbox"/>
Individual(s) involved in the incident (use additional sheet(s) if necessary):			
Name:		Name:	
<input type="checkbox"/> Complainant	<input type="checkbox"/> Respondent	<input type="checkbox"/> Complainant	<input type="checkbox"/> Respondent
Job Title:		Job Title:	
Phone:		Phone:	
Immediate Supervisor:		Immediate Supervisor:	
Respondent(s) Relationship to Complainant:			
<input type="checkbox"/> Co-Worker	<input type="checkbox"/> Supervisor	<input type="checkbox"/> Former Worker	<input type="checkbox"/> Spouse/ Family Member

<input type="checkbox"/> Customer/ Client	<input type="checkbox"/> Staff	<input type="checkbox"/> Stranger	<input type="checkbox"/> Other (Specify)
Describe Incident/Conduct in Detail: (include nature of the incident, location, individuals involved, other individuals present etc., attach additional sheets if necessary)			
Reason For Incident (if known):			
List Names of Witnesses:			
Complainant Signature:		Date:	
Signature Of Supervisor Receiving Report:		Date:	



Union Water Supply System Inc.

Health and Safety Policy

POLICY No: UW-H06-002

Date Adopted:

1.0 PURPOSE

- 1.1. Ontario is committed to improving health and safety in all workplaces, and Union Water Supply System Inc. ("**UWSS Inc.**") is dedicated to meeting this commitment. Education and training are important parts of meeting this commitment. This policy provides a brief overview of the awareness and training requirements for UWSS Inc.

2.0 GUIDELINES

- 2.1. The *Occupational Health and Safety Act* ("**OHSA**") and its regulations assign duties and responsibilities to different persons in a workplace depending on their levels of responsibility. Each person has a unique role, which ensures that everyone is working towards the same purpose: a healthy and safe working environment. UWSS Inc, supervisors, and workers all have roles to ensure health and safety as outlined in the OHSA.
- 2.2. A health and safety culture requires that all parties work together and pay constant, appropriate attention to workplace health and safety. All workplace parties at UWSS Inc. must collaborate on health and safety issues, solve problems, and make ongoing improvements to health and safety matters. The goal is to develop a sustainable health and safety culture in the workplace where everyone is committed to preventing injuries and illnesses and reducing risk.

3.0 TRAINING CONTENT REQUIREMENTS

- 3.1. The following are the content requirements of training provided to UWSS Inc. workers and supervisors. Additional job-specific training may be provided to workers and supervisors.

3.2. Workers

- 3.2.1. The worker health and safety awareness training program includes:
- (a) The duties and rights of workers under the OHSA;
 - (b) The duties of the employer and supervisors under the OHSA;
 - (c) The roles of health and safety representatives and joint health and safety committees under the OHSA;
 - (d) The roles of the Ministry of Labour, the Workplace Safety and Insurance Board (WSIB), and health and safety system partners;
 - (e) Common workplace hazards;

- (f) Workplace Hazardous Materials Information System (WHMIS) training with respect to information and instruction on hazardous products; and
- (g) Occupational illness, including latency.

3.2.2. Workers must complete the worker health and safety awareness training program as soon as practicable. Exceptions may apply if a worker shows proof of completion of a training program that meets the requirements above.

3.3. Supervisors

3.3.1. The supervisor's health and safety awareness training program includes:

- (a) The duties and rights of workers under the OHSA;
- (b) The duties of employers and supervisors under the OHSA;
- (c) The roles of health and safety representatives and joint health and safety committees under the OHSA;
- (d) The roles of the Ministry of Labour, the WSIB, and health and safety representatives under OHSA;
- (e) The roles of the Ministry of Labour, Immigration, Training and Skills Development, Workplace Safety and Insurance Board and entities under OHSA Section 22.5
- (f) How to recognize, assess, and control workplace hazards, and how to evaluate those hazard controls;
- (g) Sources of information on occupational health and safety;
- (h) Common workplace hazards;
- (i) Workplace Hazardous Materials Information System (WHMIS) training with respect to information and instruction on hazardous products; and
- (j) Occupational illness, including latency.

3.4. Supervisors must complete occupational health and safety training within one week of performing work as a supervisor. Exceptions may apply if the supervisor shows proof of completion of a training program that meets the requirements above.

4.0 RECORDKEEPING

4.1. UWSS Inc. maintains a record of workers and supervisors who complete or are exempt from training. UWSS Inc. provides workers and supervisors with written proof of training completion or exemption during continuous employment. If a former worker requests written proof of training completion or exemption within six months of the worker no longer performing work for UWSS Inc., UWSS Inc. shall provide such proof.

5.0 RESPONSIBILITIES

5.1. Every member of UWSS Inc. is responsible for the overall health and safety of the company. The specific obligations and responsibilities of UWSS Inc., supervisors and workers are set out below.

5.2. UWSS Inc.:

- 5.2.1. Provides workers with health and safety training and supervision;
- 5.2.2. Ensures all individuals in the workplace know about hazards and how to perform their work safely;
- 5.2.3. Ensures that supervisors know about their duties regarding health and safety;
- 5.2.4. Develops health and safety policies and procedures;
- 5.2.5. Ensures everyone understands and complies with policies and procedures;
- 5.2.6. Provides appropriate personal protective equipment (PPE) and clothing and ensures its use;
- 5.2.7. Maintains PPE in good condition, ensuring it fits properly and is appropriate to the circumstances, taking all relevant factors into account;
- 5.2.8. Provides the required occupational health and safety training, maintains records of such training, and provides proof of completion of the training when requested; and
- 5.2.9. Ensures that training is provided to enable a committee member to become a certified member, along with other requirements established by the chief prevention officer.

5.3. Supervisors must:

- 5.3.1. Inform workers about potential and present hazards and provide instruction for workers to perform tasks safely;
- 5.3.2. Take every reasonable precaution to protect workers;
- 5.3.3. Ensure that workers follow the policies and procedures of the workplace and the law; and
- 5.3.4. Use or wear properly fitting PPE appropriately and when required.

5.4. Workers must:

- 5.4.1. Follow health and safety policies and procedures set by UWSS Inc. and the OHSA and its regulations;

- 5.4.2. Perform work in a manner that protects the health and safety of anyone in the workplace;
 - 5.4.3. Use or wear PPE as required;
 - 5.4.4. Report when provided PPE does not fit properly or is not appropriate to the circumstances;
 - 5.4.5. Immediately report defective equipment and hazards to a supervisor; and
 - 5.4.6. Be aware of their health and safety rights.
- 5.5. Workers cannot remove or destroy any protective devices provided or use equipment in a way that could put anyone in danger. Workers must not engage in any pranks or other dangerous activities.

6.0 RIGHTS UNDER OHSA

- 6.1.1. **The Right to Know.** UWSS Inc. informs all workers of known or potential hazards at work and provides training and information to protect worker health and safety. UWSS Inc. shall inform workers about any hazards before starting work.
- 6.1.2. **The Right to Participate.** All workers have the right to participate and have input regarding health and safety. Workers can report concerns, make suggestions, and participate as a member of the health and safety committee or representative.
- 6.1.3. **The Right to Refuse Unsafe Work.** All workers have the right to refuse unsafe work without fear of reprisal if they have reason to believe that working conditions or required equipment, tools, or machinery present a health and safety concern.

7.0 TIMELINES

- 7.1. UWSS Inc. adheres to timelines outlined by the Ministry of Labour for frequency of training, retention and proof of training records, and completion deadlines.

Record of Amendments

Version	Date	Amendment Description	Approved By
1.0		Initial policy approval and implementation	Board



Union Water Supply System Inc. Return-to-Work Policy

POLICY No: UW-H06-003

Date Adopted:

1.0 PURPOSE

- 1.0.1 The purpose of this policy is to ensure that Employees (the “**Employees**”) of Union Water Supply System Inc. (“**UWSS Inc.**”) return to work safely and in a timely manner following a Job-Protected Leave, an Extended Approved Absence, a Workplace Injury or who have otherwise been absent from work due to a disability and require disability-related Accommodations in order to return to work.
- 1.0.2 This policy is established in compliance with the *Employment Standards Act, 2000* (“**ESA**”), the *Workplace Safety and Insurance Act, 1997* (“**WSIA**”), the *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, c. 11, and the *Ontario Human Rights Code*. It outlines the roles and responsibilities of UWSS Inc. and Employees and establishes a structured return-to-work process that includes Accommodation where required.
- 1.0.3 This policy does not apply to Employees returning from vacation, casual sick days, or unapproved absences.

2.0 GUIDELINES

- 2.0.1 UWSS Inc. is committed to returning Employees to work in a safe and timely manner.
- 2.0.2 The return-to-work process is adapted as necessary to meet the needs of the Employee, including any required Accommodation.
- 2.0.3 Individuals responsible for facilitating the return-to-work process receive training on preparing and implementing a Return-to-Work Plan, including ongoing awareness of the duty to accommodate.
- 2.0.4 UWSS Inc. complies with the WSIA and cooperates fully with the Workplace Safety and Insurance Board (“**WSIB**”) for Employees returning after a work-related injury.

3.0 RE-EMPLOYMENT

- 3.0.1 Employees returning to work following a Job-Protected Leave or a Workplace Injury are re-employed in accordance with the ESA or WSIA, as applicable.

Protected Leave

- 3.0.2 When an Employee concludes a Job-Protected Leave under UWSS Inc.'s Protected Leaves Policy, they are reinstated to the position they most recently held. If that position no longer exists, they are reinstated to a comparable position.
- 3.0.3 Upon reinstatement, the Employee is paid either the rate they most recently earned or the rate they would be earning if they had worked throughout the leave, whichever is greater.

Workplace Injury

- 3.0.4 Re-employment obligations under the WSIA apply where UWSS Inc. regularly employs 20 or more workers.
- 3.0.5 Employees who have been continuously employed with UWSS Inc. for at least one year and are unable to work due to a Workplace Injury are entitled to re-employment when medically able to do so.
- 3.0.6 When an Employee is medically able to perform the essential duties of their pre-injury position, they are offered re-employment in that position. If the position no longer exists, they are offered alternate employment that is comparable in nature and earnings to their pre-injury position.
- 3.0.7 When an Employee can perform Suitable Work but not the essential duties of their pre-injury position, they are offered the first available suitable position that becomes available at UWSS Inc.
- 3.0.8 The obligation to re-employ an Employee under the WSIA ends on the second anniversary of the date of injury, one year after the Employee is medically cleared to perform the essential duties of their pre-injury position, or the date the Employee reaches 65 years of age, whichever occurs first.
- 3.0.9 Despite these limitations, UWSS Inc. may have ongoing obligations to accommodate an Employee's disability under the *Ontario Human Rights Code*, up to the point of Undue Hardship.

4.0 RESPONSIBILITIES

4.1 UWSS Inc. is responsible for:

- 4.1.1 Establishing and applying policies and procedures regarding leaves, Accommodation, and return-to-work.
- 4.1.2 Meeting with Employees and engaging them in discussions about returning to work.
- 4.1.3 Requesting, gathering, and documenting information required for a Return-to-Work Plan.

- 4.1.4 Providing Accommodation up to the point of Undue Hardship.
- 4.1.5 Working with Employees to obtain information from healthcare professionals regarding functional abilities, where necessary.
- 4.1.6 Maintaining confidentiality of all documentation and sharing only on a need to-know basis.
- 4.1.7 Developing individual Return-to-Work Plans in a timely manner.
- 4.1.8 Regularly reviewing and updating Return-to-Work Plans as needed.
- 4.1.9 Providing training to enable Employees to complete alternate duties, where applicable.
- 4.1.10 Providing re-orientation to Employees as necessary.

4.2 Employees are responsible for:

- 4.2.1 Informing UWSS Inc. of expected return-to-work dates or any changes.
- 4.2.2 Informing UWSS Inc. about the need for Accommodation, where known.
- 4.2.3 Providing documentation requested to facilitate the return-to-work process.
- 4.2.4 Communicating changes in needs and progress promptly.

5.0 RETURN-TO-WORK PROCESS

- 5.0.1 Employees taking a Job-Protected Leave must provide notice of their return-to-work date in accordance with the applicable leave policy.
- 5.0.2 In other circumstances, Employees should inform UWSS Inc. of their expected return-to-work date at the start of their leave.
- 5.0.3 UWSS Inc. maintains periodic contact with Employees during extended leave to update expected return dates.
- 5.0.4 A Return-to-Work Plan is developed collaboratively with the Employee, UWSS Inc., and any relevant third parties, including healthcare providers, union representatives, insurance providers, or the WSIB.
- 5.0.5 Relevant documentation may be requested to assess functional abilities and identify potential Accommodations.

6.0 ACCOMMODATION

- 6.0.1 UWSS Inc. provides Accommodation based on prohibited grounds of discrimination under the *Ontario Human Rights Code*, up to the point of Undue Hardship.
- 6.0.2 Accommodation may be initiated by the Employee, UWSS Inc., or an authorized third party.
- 6.0.3 Requests for Accommodation should be submitted to the appropriate authority.

7.0 RETURN-TO-WORK PLAN AND REINTEGRATION

- 7.0.1 The Return-to-Work Plan is developed collaboratively and includes the following details:
 - 7.0.1.1 Employee name and current job description.
 - 7.0.1.2 Expected Return-to-work date.
 - 7.0.1.3 Pre-leave position or designated alternate position.
 - 7.0.1.4 Job description for the alternate position, if applicable.
 - 7.0.1.5 Functional abilities and limitations, if applicable.
 - 7.0.1.6 Accommodation measures required and their expected duration.
 - 7.0.1.7 Work schedule to be implemented upon return.
 - 7.0.1.8 Follow-up and check-in schedule occurring at regular intervals, every 2-4 weeks, or more frequently if required based on the Employee's needs or operational considerations.
 - 7.0.1.9 Re-evaluation date to assess successful reintegration.
- 7.0.2 Employees returning to work in an alternate position receive training to perform the duties of the role effectively.
- 7.0.3 The Return-to-Work Plan is reviewed in a meeting with the Employee and any relevant parties. Adjustments are made based on the Employee's feedback and operational requirements.
- 7.0.4 Once finalized, the Return-to-Work Plan is signed by the Employee and retained confidentially in accordance with UWSS Inc. records procedures.
- 7.0.5 Employees undergo re-orientation as necessary, depending on the duration of leave and any changes within UWSS Inc.

- 7.0.6 UWSS Inc. conducts regular check-ins to ensure the Return-to-Work Plan is working effectively and meets the Employee's needs. The Return-to-Work Plan is reviewed on the re-evaluation date to confirm successful reintegration or determine if Accommodations need to be extended or revised.

8.0 DEFINITIONS

- 8.1 *Accommodation*: Any modification or adjustment to the work environment, work schedule, job duties, or workplace policies that enables an Employee to perform the essential functions of their role, provided the adjustment does not cause Undue Hardship to UWSS Inc., in accordance with the *Ontario Human Rights Code*.
- 8.2 *Job-Protected Leave*: A leave of absence from work that is provided under the *Employment Standards Act, 2000* or other applicable legislation, during which the Employee has the right to return to their pre-leave position or a comparable position. Examples include pregnancy and parental leave, family caregiver leave, and personal emergency leave.
- 8.3 *Extended Approved Absence*: Any leave from work, other than vacation or casual sick days, that has been formally approved by UWSS Inc., including medical or disability leaves that do not fall under ESA Job-Protected Leaves.
- 8.4 *Return-to-Work Plan*: A documented plan developed collaboratively between the employee, UWSS Inc., and, if applicable, third parties (e.g., healthcare providers, union representatives, WSIB), outlining the steps, Accommodations, schedules, and supports required for the Employee to safely return and reintegrate into the workplace.
- 8.5 *Suitable Work*: Work that the Employee is able to perform given their functional abilities and restrictions, compatible with their skills, training, and experience.
- 8.6 *Workplace Injury*: An injury or illness arising out of, or in the course of, employment and subject to re-employment obligations under the *Workplace Safety and Insurance Act, 1997*.
- 8.7 *Undue Hardship*: A limit to the employer's duty to accommodate, determined on a case-by-case basis, considering the cost, outside sources of funding, if any, and health and safety requirements, if any.

ACKNOWLEDGEMENT AND AGREEMENT

I, _____, acknowledge that I have read and understand the Return-to-Work Policy of Union Water Supply System Inc. I agree to adhere to this policy and will ensure that Employees working under my direction adhere to this policy. I understand that if I violate the rules set forth by this policy, I may face disciplinary action up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____

Record of Amendments

Version	Date	Amendment Description	Approved By
1.0		Initial policy approval and implementation	Board

APPENDIX "A"**Union Water Supply System Inc. ("UWSS Inc.") Return-to-Work Form****Employee Information**

Employee Name: _____

Department/Unit: _____

Job Title: _____

Supervisor/Manager: _____

Return-to-Work Details

Expected Return-to-Work Date: _____

Pre-Leave Position: _____

Alternate Position (if applicable): _____

Job Description for Alternate Position (if applicable): _____

Functional Abilities and Limitations

Description of Functional Abilities/Limitations:

Attach medical documentation if applicable (must be current and relevant to the functional abilities and limitations).

Accommodation Measures

Accommodation Measures Required:

Expected Duration: _____

Work Schedule

Schedule Upon Return: _____

Follow-Up and Check-In Schedule

Dates and Methods of Check-Ins:

Dates	Methods of Check-Ins

Training/Re-Orientation

Training Required for Alternate Duties:

Re-orientation Required (yes/no): _____

Re-Evaluation

Re-Evaluation Date: _____

Notes/Comments on Reintegration Progress:

Acknowledgement and Signatures

Employee: _____ Date: _____

Supervisor/Manager: _____ Date: _____

HR Representative: _____ Date: _____

Confidentiality Notice: *This form contains confidential information and is only accessible to individuals involved in the Employee's return-to-work process.*