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Chief Regulatory Officer	Board of Directors	January 1, 2026

# Ontario One Call External Complaints Policy

## Review History

<b>Version</b>	<b>Date of Review</b>	<b>Key Revisions (if applicable)</b>
1.0	November 26, 2025	Initial version was approved by the Board of Directors.

## 1.0 Introduction

- 1.1 As a public safety administrative authority, Ontario One Call (“OOC, or the “Corporation”) is committed to serving the people of Ontario (the “Public”) and OOC’s stakeholders, including but not limited to the Government of Ontario, underground infrastructure owners, excavators, homeowners and locate service providers (collectively “OOC’s Stakeholders”), through the effective delivery of its statutory mandate.
- 1.2 OOC understands the importance of a complaint process as an accountability mechanism. The Corporation is committed to addressing each Complaint with appropriate care and due process. This policy establishes the framework for handling the public and stakeholders’ concerns about OOC’s staff and service.
- 1.3 OOC’s obligations and responsibilities are established by the *Ontario Underground Infrastructure Notification System Act, 2012* (the “Act”). This policy applies to complaints about OOC’s staff or service delivery issues concerning matters which are within OOC’s statutory mandate.

## 2.0 Scope of this Document

- 2.1 This policy applies to complaints from the public and OOC’s stakeholders about the conduct of OOC’s staff and overall quality of OOC’s services.
- 2.2 This policy does not apply to the following matters and any such, any complaints received will be closed:
  - 2.2.1 Complaints about issues that are outside the scope of OOC’s statutory mandate;
  - 2.2.2 Complaints already addressed by another OOC policy or procedure (e.g., OOC’s Privacy Policy);
  - 2.2.3 Complaints against a member or excavator that are being handled pursuant to OOC’s Rules for Members and Excavators (“OOC’s Rules”);
  - 2.2.4 A prior or existing provincial prosecution or appeal process undertaken in accordance with the Act or OOC’s Rules; or
  - 2.2.5 OOC’s Board of Directors (the “Board”) who follow an independent process as outlined in the Corporation’s by-laws.
- 2.3 Where conflicts exist between this policy and the Act, any other applicable legislation, OOC’s by-laws, or OOC’s Rules, the Act, other legislation, by-laws or OOC Rules shall take precedence.

### 3.0 Definitions

Term	Definition
<b>Abandoned</b>	A complaint is considered abandoned if the complainant fails to respond to any request for additional information from OOC in their screening or review of the case within 15 business days of OOC having made the inquiry.
<b>Case Review</b>	A case review is a fact-finding process involving the gathering and examination of information to derive conclusions based on the available evidence. In the context of this policy, the case review phase begins after a complaint is screened by OOC.
<b>Case Reviewer</b>	A case reviewer is an OOC team member, usually the reporting manager of the subject of the complaint, who undertakes a review of the complaint.
<b>Complainant</b>	A member of the public or an OOC stakeholder who makes a formal complaint to OOC that falls within the scope of this policy.
<b>Complaint</b>	A complaint is a formal written allegation addressed to OOC that complies with the submission procedure and scope of this policy, alleging OOC's staff misconduct or dissatisfaction with OOC's service delivery.
<b>Complaint Form</b>	The written form available on OOC's website by which complaints are communicated to OOC.
<b>Dismissal</b>	A dismissal occurs where a complaint: <ul style="list-style-type: none"> <li>(a) is administratively terminated because it does not fall within the scope of this policy; or</li> <li>(b) the available information does not substantiate the complainant's allegations concerning OOC staff misconduct or dissatisfaction with OOC's service delivery.</li> </ul>
<b>Formal Response</b>	A formal response is the response from OOC that is sent to the complainant at the end of the case review. The formal response will include the case reviewer's findings and remedies, if any.
<b>Late Complaint</b>	Has the meaning provided in section 5.1.5.
<b>Resolved Complaint</b>	A resolved complaint is a complaint where OOC has: <ul style="list-style-type: none"> <li>(a) declined to proceed with the complaint at the screening stage for any reason;</li> <li>(b) issued a formal response to the complainant and there is no reconsideration request; or</li> <li>(c) in the case of a reconsideration request, the reconsideration has been completed or rejected as being non-compliant with this policy.</li> </ul>
<b>Reconsideration</b>	A complainant may request reconsideration of a formal response based on new information that was not previously available at the time of the complaint in accordance with this policy.
<b>Respondent</b>	An OOC staff member who is the subject of a complaint or who is responsible for delivering the OOC service that is the subject of a complaint.
<b> Screener</b>	A screener is a designate of OOC's Chief Regulatory Officer ("CRO") who receives and screens the complaint in accordance with this policy before the complaint is provided to the case reviewer. For complaints related to OOC

Term	Definition
	staff conduct, the Corporation’s Human Resources (“HR”) department will be consulted.
<b>Withdrawal</b>	A withdrawal is a voluntary removal of a complaint by the complainant at any point in the process.

#### 4.0 Principles

- 4.1 **Accountability** – Case reviews shall be conducted fairly. The procedure should adhere to the rules established in this policy. The Corporation’s proceedings and resolution of complaints will be impartial.
- 4.2 **Timeliness** – OOC is committed to efficiency in addressing and resolving complaints. This means that each complaint is acknowledged promptly by OOC, reviewed thoroughly, and resolved within a reasonable timeframe.
- 4.3 **Respect** – Complainants and respondents will be treated with courtesy.

#### 5.0 Complaint Process

##### 5.1 General Requirements for Complaints

- 5.1.1 All complaints to OOC must be made in writing using the OOC Complaint Form accessible to the complainant on the Corporation’s website.
- 5.1.2 All complaints must include:
  - (a) the complainant’s contact information;
  - (b) the complainant’s description of the matter, including events, dates, circumstances, actions, or inactions about which the complainant is concerned;
  - (c) copies of any relevant documents and evidence (including emails, voice recordings or transcriptions, photos, screenshots, videos etc.); and
  - (d) the complainant’s desired resolution or remedy.
- 5.1.3 If the complainant experiences challenges in submitting complaint due to a disability defined under the *Accessibility for Ontarians with Disabilities Act, 2005*, upon reasonable request to the Corporation, OOC shall provide reasonable accommodations for the complainant to participate in the complaint process.
- 5.1.4 Upon submitting the complaint in accordance with sections 5.1.1 and 5.1.2, the complaint shall be acknowledged by OOC within five business days.

- 5.1.5 All complaints must be submitted within six months of:
- (a) the date of the alleged conduct or circumstance; or
  - (b) the last instance of such conduct or circumstance in the case of a series of events.

Complaints beyond the 6-month timeframe (“late complaint”) will not be considered and OOC will close the file.

- 5.1.6 At any point in the complaint process, the complainant may withdraw the complaint. Where this occurs, OOC will close the file.
- 5.1.7 If a complainant fails to respond to any communication from OOC (e.g. from a screener or a case reviewer) for over 15 business days, OOC will note that the complaint has been abandoned and close the file.

## 5.2 Screening

- 5.2.1 When OOC receives a complaint, a screener shall ensure the complaint form is complete. If additional information is required before the complaint can be screened, the screener will contact the complainant to request further information.
- 5.2.2 For complaints related to OOC staff conduct, the Corporation’s HR department will be consulted.
- 5.2.3 If the screener is the person who is the subject of the complaint, the screener must consult the CRO to re-assign the complaint to another suitable person to screen the complaint.
- 5.2.4 A complaint meeting one or more of the criteria below shall be dismissed upon the screening, subject to approval by the CRO:
- (a) the complaint is a late complaint;
  - (b) the complaint is incomplete or is being submitted in a format that is not acceptable, where the complainant has not provided the information requested by the screener within 15 business days or has provided the information but the complaint remains non-compliant;
  - (c) the complaint is outside the scope of this policy (i.e. the matter does not concern misconduct regarding OOC’s staff or an OOC service delivery issue or is outside of OOC’s statutory mandate);
  - (d) the complaint is duplicative of a matter that is currently under a case review by the same or a related complainant or a matter that has already been resolved or dismissed; or
  - (e) the complaint is determined to be trivial, frivolous, vexatious or made in bad faith.

- 5.2.5 Once the complaint has been screened, and provided that the complaint has not been dismissed in accordance with section 5.2.4, the screener shall advise the complainant that their complaint is progressing to a case review.

### 5.3 Case Review

- 5.3.1 The CRO shall assign an appropriate person as the case reviewer for the complaint. If the complaint alleges substandard conduct or behaviour by an OOC staff member, the case reviewer must be a person in a supervisory role to the respondent.
- 5.3.2 If there are any real or perceived conflicts of interest in handling the complaint, the complaint shall undergo concurrent review by the CRO and the HR leadership to support impartiality.
- 5.3.3 If the Chief Executive Officer (“CEO”) is the subject of the complaint, the complaint shall be referred to the OOC Board Chair who will be the complaint reviewer. The disposition of any complaint concerning the CEO is subject to the final decision of the Board.
- 5.3.4 Nothing in this policy prevents the CRO from assigning an independent external third-party to conduct the case review.
- 5.3.5 Upon reviewing the complaints, if the case reviewer forms the view that the complaint should be dismissed, the case reviewer may recommend the complaint to be dismissed by the CRO.
- 5.3.6 The respondent(s) or affected OOC parties must be notified of the complaint and shall cooperate with the case review by providing written statements and other evidence to assist the case reviewer.
- 5.3.7 The case reviewer shall be judicious regarding what information must be disclosed to the respondent.
- 5.3.8 The case reviewer shall follow good record keeping practices and document key facts (e.g. date, time, location), collect and organize the evidence (interviews, written statements, photographic evidence etc.), and document their recommendations and rationale in a clear and organized manner.
- 5.3.9 The case reviewer shall be transparent about the progress of the case review to the complainant and provide timely responses to the inquiries about the case review’s status.

## 5.4 Formal Response

- 5.4.1 Based on their findings, the case reviewer shall recommend one of the following outcomes for the CRO's consideration:
- (a) Dismissal of the complaint;
  - (b) Remedies or educational dispositions; or,
  - (c) Disciplinary action up to and including termination.
- 5.4.2 If the complaint is related to staff conduct, HR leadership will be part of the decision-making process. Remedial consequences for an OOC employee are confidential and will not be shared with the complainant. Remedial actions could include training and/or disciplinary action, up to and including termination of employment with OOC.
- 5.4.3 Where the CRO determines that the complaint should be dismissed, it will be communicated to the complainant in a formal response.
- 5.4.4 After receiving the CRO's approval, the case reviewer shall:
- (a) work with the appropriate business unit leaders to implement remedial actions, which may include staffing solutions, operational measures, or technology-based interventions;
  - (b) document the estimated completion time for the remedial actions; and
  - (c) in a formal response, advise the complainant of the outcome of the case review and, in general terms and without disclosing the personal or confidential information of the respondent, the remedial actions, if applicable, that OOC will take to address the complaint.

## 5.5 Reconsideration

- 5.5.1 If the complainant is dissatisfied with the formal response, the complainant may request reconsideration, under the following circumstances:
- (a) the complainant has new evidence to disclose that was not previously available to the complainant at the time of the case review ("new evidence");
  - (b) the new evidence is relevant to the complaint and may reasonably and materially affect the findings of case review and formal response; and
  - (c) the complainant must request reconsideration and provide the new evidence no later than 15 business days of receipt of OOC's formal response.

- 5.5.2 Upon the CRO agrees to reconsider the complaint, the matter shall proceed through the case review and formal response stages as prescribed in sections 5.3 and 5.4.
- 5.5.3 Only one reconsideration process may be accepted for each complaint.

## 5.6 Tracking, Records and Reporting

- 5.6.1 The CRO or their designate shall log all complaints, including those that are withdrawn or dismissed.
- 5.6.2 For all complaints, the screener or case reviewer must document the outcome of the complaint and retain all documentation related to the complaint in accordance with OOC's related policies.
- 5.6.3 OOC shall publish a summary of the complaints (including the number of the complaints and their outcomes) in its Annual Report in accordance with the Memorandum of Understanding between the Corporation and the Government of Ontario. The summary will also be provided to the Board for awareness, along with a summary of any observed trends or risks identified.

## 6.0 Training, Communication, Oversight & Audit

- 6.1 This policy and the complaint form are available on OOC's website.
- 6.2 The CRO will develop and communicate training materials for screeners and case reviewers.
- 6.3 The CRO shall perform periodic checks (as noted below) of the complaint process to support adherence to the policy and to seek feedback from screeners and case reviewers.
- 6.4 In cases of non-compliance of this policy by OOC staff, the CRO will take appropriate action, such as issuing reminders and warnings, or providing retraining to ensure compliance. Disregard of this policy may result in disciplinary action, up to and including termination, in consultation with the concerned staff member's manager and HR department.

## 7.0 Evaluation & Review

- 7.1 This policy will follow the regular schedule of review with at least one review occurring every three years.
- 7.2 For policy review, the CRO will take into consideration the trends of received complaints, complainant satisfaction, and feedback from OOC staff during the preceding review cycle.

- 7.3 Any amendments to this policy will be submitted for Human Resources, Governance and Nominations Committee's (HRGN) approval and, if approved, posted to the OOC's website.

## **8.0 Associated Documents**

### **8.1 General**

- (a) *Ontario Underground Infrastructure Notification System Act, 2012* and its regulations
- (b) Memorandum of Understanding between the Ontario One Call and the Minister of Public and Business Service Delivery and Procurement

## **9.0 Approval**

- 9.1 This policy was approved by the Board on November 26, 2025.
- 9.2 Any concerns or questions about this policy may be directed to the office of the CRO.