

## **POLICY AND PROCEDURES FOR COMPLAINTS AGAINST A DIPLOMATE CERTIFIED BY THE CANADIAN BOARD OF GENETIC COUNSELLING- CONSEIL CANADIEN DE CONSEIL GÉNÉTIQUE (“CBGC-CCCG”)**

Certification by the Canadian Board of Genetic Counselling – Conseil canadien de conseil génétique (CBGC-CCCG, abbreviated henceforth as CBGC) indicates that an individual has successfully met CBGC’s eligibility requirements and other established criteria for certification by the CBGC. Certification does not guarantee continuing competence, ethical behaviour, or successful outcomes for individual patients.

The CBGC may receive a complaint about a Canadian certified genetic counsellor (“CCCG”) or conseiller(ère) en génétique agréé(e) du Canada (“CGAC”) or an applicant seeking certification that warrants review under the CBGC By-laws. This document sets forth the CBGC policy for responding to complaints.

### **I. CBGC COMPLAINT PROCESS**

#### **A. General Rules and Process**

- 1. The CBGC will not entertain complaints regarding matters of personal or professional disagreement.**
2. If the complaint pertains to professional misconduct, only behavior that has been investigated and acted on by an employer, a legal body, or a regulatory body will be reviewed under this policy. It is not under the purview of the CBGC to investigate professional misconduct.
3. All complaints must be submitted in writing and signed by the complainant. If the complainant requests a format other than a written complaint, a video of no more than 3 minutes can be submitted detailing the complaint.
4. The CBGC does not guarantee the confidentiality of the complainant or those substantiating any complaint.
5. The complainant will be notified that the CBGC has received the complaint but will not be notified of any action that the CBGC may take in response to the complaint.
6. The CBGC has no obligation to investigate the alleged inappropriate actions of any individual or to share any information with an external body.

7. The CBGC will evaluate the complaint and accompanying documentation to determine if it is sufficient and applicable to an offense outlined in section 14 of the CBGC By-laws (Appendix A). Any information provided by the complainant to the CBGC may be shared with an appropriate external organization for further investigation.
8. All members of the CBGC Board of Directors must adhere to section 23 of the CBGC By-laws regarding conflicts of interest when a complaint is received (Appendix B).

## **B. Submission of a Complaint:**

Any person who wishes to report action by a Canadian certified genetic counselor (“CCGC”) or conseiller(ère) en génétique agréé(e) du Canada (“CGAC”) or an applicant seeking certification that warrants review under the CBGC By-laws must follow these steps to file a complaint with the CBGC. **Only violations outlined in the CBGC By-laws will be considered.**

1. Anonymous complaints will not be accepted or reviewed.
2. All complaints must be submitted in writing. The written complaint should include as much information and detail as possible about the incident(s) and individual(s) involved and must be signed by the complainant. If a format other than written is requested, a video of no more than 3 minutes can be submitted. A video complaint should include as much information and detail as possible about the incident(s) and individual(s) involved, must include the date of recording, and must include a verbal attestation that the individual submitting the video is the complainant or is representing the complainant.
3. The CBGC may request that the complainant provide additional written substantiation within thirty (30) days from the date the original complaint was received. Such substantiation might include corroborating letters, performance records, employer evaluations, written warnings, or other notices of deficiencies. If requested substantiation is not provided within thirty (30) days after the initial complaint, the complaint may be closed, with no further action taken by the CBGC, unless a request for a time extension is submitted by the complainant at which time an extension **may** be approved by the CBGC.



4. The complaint, and any other information that has been gathered regarding the complaint, may be released to the individual against whom the complaint was filed, the CBGC Board of Directors, their respective attorneys, and other parties authorized by the complainant, required by law, or deemed necessary by the CBGC to protect patient well-being.
5. The complainant and those who substantiate the complaint will be asked to sign an authorization to release the written complaint and the corroborating materials to the individual against whom the complaint was filed, the Board of Directors and staff of the CBGC, their respective attorneys, and appropriate outside parties as deemed necessary by the CBGC (see Attachment A).
6. The CBGC Board of Directors will determine if the alleged action or behaviour is a violation outlined in the CBGC By-laws and whether there is sufficient evidence to substantiate that conduct that may be detrimental to the Corporation has occurred.

**ATTACHMENT A: CBGC-CCCG COMPLAINT PROCEDURES AUTHORIZATION FORM**

In connection with the complaint I have filed against \_\_\_\_\_, and/or the material I have submitted to substantiate such complaint, I understand and acknowledge that, while it is the policy of the Canadian Board of Genetic Counselling – Conseil canadien de conseil génétique (CBGC-CCCG, abbreviated henceforth as CBGC) to seek to preserve the confidentiality of complainants and those who substantiate the complaint, there are circumstances in which the identities of complainants or those who substantiate the complaint, or materials supplied by them, will be disclosed. Those circumstances include, but are not limited to, the following:

- a. The CBGC will disclose the identities of complainants or those who substantiate the complaint, or materials supplied by them, when such disclosure is required by law.
- b. The CBGC may disclose such information to the individual against whom the complaint was filed when, in its sole discretion, it determines that such disclosure is necessary to fully investigate the complaint.
- c. In the course of an investigation, confidential information concerning a complaint may also be shared with CBGC staff, members of the Board of Directors, CBGC attorneys, and the insurance company with which CBGC maintains an insurance policy.

Accordingly, I hereby authorize the CBGC to release my complaint/substantiating information and other written materials, including my name, to the individual against whom the complaint was filed, to staff and members of the Board of Directors of the CBGC, to their respective attorneys, and to other persons required by law or deemed necessary by the CBGC, to fully investigate the complaint.

Name \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

## **Appendix A - Section 14 of 2025 CBGC-CCCG By-laws**

### **14. Discipline of Members**

The CBGC-CCCG is a national not for profit association and not a regulatory body. The CBGC-CCCG cannot revoke certification from a current diplomate. The CBGC-CCCG has the authority to suspend or expel the CBGC-CCCG membership of any member from the Corporation for any one or more of the following grounds:

- A. violating any provision of the articles, by-laws, or written policies of the Corporation;
- B. carrying out any conduct which may be detrimental to the Corporation as determined by the Board in its sole discretion;
- C. for any other reason that the Board at its sole and absolute discretion considers to be reasonable, having regard to the purpose of the Corporation.

In the event that the Board determines that a member should be expelled or suspended from membership in the Corporation, the Chair, or such other officer as may be designated by the Board, shall provide twenty (20) days' notice of suspension or expulsion to the member and shall provide reasons for the proposed suspension or expulsion. The member may make written submissions to the Chair, or such other officer as may be designated by the Board, in response to the notice received within such twenty (20) day period. In the event that no written submissions are received by the Chair, the Chair, or such other officer as may be designated by the Board, may proceed to notify the member that the member is suspended or expelled from membership in the Corporation. If written submissions are received in accordance with this section, the Board will consider such submissions in arriving at a final decision and shall notify the member concerning such final decision within a further twenty (20) days from the date of receipt of the submissions. The Board's decision shall be final and binding on the member, without any further right of appeal.

## **Appendix B – Section 23 from 2025 CBGC-CCCG By-laws**

### **23. Conflict of Interest**

Where a director or officer has, directly or indirectly, an interest in a material contract or material transaction, whether made or proposed, with the Corporation or otherwise has a conflict of interest, such director or officer shall: (a) disclose such interest in accordance with the Act and any conflict of interest policy that may be adopted by the Board of Directors; and (b) not vote on any resolution or participate in any discussion with respect to the resolution concerning the matter in accordance with the Act and any conflict of interest policy that may be adopted by the Board of Directors.