



GTHL COMPLAINT MANAGEMENT POLICY

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PREAMBLE

1. Hockey Canada is a signatory of the Office of the Sport Integrity Commissioner ("OSIC"), an independent division of the Sport Dispute Resolution Centre of Canada ("SDRCC") which comprises the functions of the Sport Integrity Commissioner.
2. Hockey Canada has developed a [Maltreatment Complaint Management Policy](#) (the "Hockey Canada Policy") to provide a fully independent and procedurally fair manner to handle all complaints which remain under its jurisdiction even though it has signed on to OSIC.
3. Hockey Canada has engaged an Independent Third-Party ("ITP") to oversee its complaint mechanism. The ITP will be responsible for the administration of all complaints, which will include accepting and screening complaints, determining jurisdiction over the complaints, determining the procedure that will be followed with respect to each complaint, and selecting the adjudicative chair or adjudicative panel who will be responsible for assessing whether a violation has occurred and what the appropriate discipline should be, if any.
4. The Ontario Hockey Federation ("OHF") [Respect and Expectation Policy](#) ("OHF Policy") provides, among other things, that:
 - (a) Maltreatment, Harassment, Bullying and Misconduct in all its forms will not be tolerated. Accordingly, all Registered Participants are responsible for making every reasonable effort to uphold this commitment. Registered Participants can expect to have an environment free from Maltreatment, Bullying or Harassment.
 - (b) All Registered Participants have a duty to report any form of Maltreatment, Bullying, Harassment or Misconduct as soon as practical under the circumstances.
 - (c) All Complaints against a Registered Participant should be made directly to the ITP engaged by Hockey Canada to oversee its complaint mechanism.
 - (d) Any complaint submissions that are not covered under the definition of Serious Misconduct in the [Hockey Canada Policy](#) will be returned to the OHF by the ITP to be reviewed in accordance with OHF By-Laws, Regulations and Policies.

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- (e) Upon receipt of a Complaint returned from the ITP that is deemed to be potential Misconduct or violation of one of the OHF Codes of Conduct, the OHF Member (e.g., the GTHL) will conduct an investigation consistent with the OHF Policy.
 - (f) OHF Members (e.g., the GTHL) are required to oversee all investigations within their jurisdiction.
5. The [OHF Policy](#) also provides that the investigation will adhere to all principles of natural justice, providing procedural and substantive due process for all parties to the investigation. The [OHF Policy](#) does not otherwise specify how the investigation is to be conducted.
6. This GTHL Complaint Management Policy (“GTHL Policy”) sets out the GTHL’s process for investigating and adjudicating Complaints of Maltreatment, Harassment, Bullying and Misconduct.

Section 1 – Definitions

7. The below terms will have the following meanings for the purpose of this Policy:
- (a) **“Adjudicative Panel”** means the panel of up to three (3) GTHL Board members appointed by a GTHL staff member designated by the GTHL’s Executive Director to conduct a hearing of a matter handled under Process #3, as described below.
 - (b) **“Affected Party”** means an individual who is the subject of, had involvement in or was impacted by an incident that gives rise to a Complaint.
 - (c) **“Complainant”** means an individual or organization who submits a Complaint.
 - (d) **“Complaint”** means an allegation submitted to the GTHL, GTHL Member, Hockey Canada, the OHF or the ITP that a Participant has violated a Policy, Rule, or Code of Conduct by which that Participant is bound.
 - (e) **“GTHL Member”** means the Clubs and Associations approved by the GTHL Board to participate in its programming.
 - (f) **“ITP”** means Hockey Canada’s independent third-party, which is responsible for the management of all Complaints over which the ITP asserts jurisdiction.
 - (g) **“Maltreatment, Harassment and Bullying”** mean a volitional act and/or omission that results in harm, or has the potential for physical or psychological harm, and includes harassment, bullying, psychological maltreatment, physical maltreatment, neglect, and sexual maltreatment as those terms are defined in the [Hockey Canada Policy](#).

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- (h) **“Mediator”** means the individual appointed by a GTHL staff member designated by the GTHL’s Executive Director to manage a Complaint in accordance with Process #1, as described below.
- (i) **“Minor”** means an individual who is under the age of 18 years old.
- (j) **“Misconduct”** refers to the behaviour or pattern of behaviour that is found, by a formal process (example: independent investigation) or informal process (for example: an internal fact-finding) to be contrary to the OHF Codes of Conduct and that is not Maltreatment, Harassment and Bullying as defined in the [Hockey Canada Policy](#).
- (k) **“OSIC”** means the Office of the Sport Integrity Commissioner.
- (l) **“Participant”** means all categories of individual members and/or registrants (which include, but are not limited to, players, coaches, officials, team managers, administrators, instructors, employees, committee members, and GTHL board members) who are subject to the policies or Codes of Conduct of the GTHL.
- (m) **“Party”** means an Affected Party, Complainant, a Respondent and/or the GTHL as appropriate in the circumstances, as determined by the GTHL.
- (n) **“Policy”** means this GTHL Complaint Management Policy.
- (o) **“Power Imbalance”** means where one Participant has authority or control over another person, is in a position to confer, grant or deny a benefit or advancement to the person, or is responsible for the physical or psychological well-being of the other person.
- (p) **“Respondent”** means the Participant who is the subject of a Complaint.
- (q) **“SDRCC”** means the Sport Dispute Resolution Centre of Canada.
- (r) **“Serious Misconduct”** means an allegation of misconduct which the ITP determines, in its sole discretion, would constitute a severe form of Maltreatment, Harassment, Bullying and Misconduct, if proven.
- (s) **“Sexual Maltreatment”** means any pattern or a single incident, whether physical or psychological in nature, which is committed, threatened, or attempted, and that has the potential to be harmful to a person’s sexual integrity.

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Section 2 – Where Can Complaints Be Submitted and How Will They Be Screened?

8. All Complaints against a Participant may be made either to the ITP by way of their online form: <https://sportdispute-hockey.com/report-a-violation> or to the GTHL by email to Participantsafety@GTHLCanada.com. However, where the GTHL receives a Complaint directly, it may refer the matter to the ITP for handling.

9. The ITP process is set out in the [Hockey Canada Policy](#).

Section 3 – How Will Complaints Against Participants Be Managed by the GTHL?

11. If a Complaint against a Participant is directed by the ITP and/or OHF to the GTHL for adjudication, a GTHL staff member designated by the GTHL's Executive Director will triage the Complaint as follows:

- (a) If the Complaint does not involve allegations of a violation of a GTHL, OHF or Hockey Canada Rule or Policy, it will be dismissed. The Complainant will be advised regarding the reasons for the summary dismissal, and such decision cannot be appealed.
- (b) If the Complaint contains allegations which, in the discretion of the GTHL, appear not to amount to Maltreatment, Harassment, Bullying or Misconduct, the GTHL will determine whether the Complaint should be directed to the appropriate GTHL Member for adjudication, or to the GTHL Executive Director for a decision, or directly to an Adjudicative Panel hearing as per Process #3 outlined below.
- (c) If the Complaint contains allegations which, in the discretion of the GTHL, appear to amount to Maltreatment, Harassment, Bullying or Misconduct, the GTHL will first offer the parties the opportunity to mediate the Complaint in accordance with Process #1 outlined below. If either or both parties decline mediation, the Complaint will be adjudicated in accordance with Process #2 below.

12. At their discretion, the GTHL, Mediator Adjudicative Panel may request additional information from a Complainant or Respondent at any stage of the Complaint investigation and adjudication process.

13. At the outset of each investigation, the GTHL will consider whether interim suspensions or other restrictions on participation should be put in place pending the completion of the investigation. Such measures may be appropriate depending on the nature of the allegations and the information contained in the Complaint.

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Process #1 – Mediation

14. Following the determination that a Complaint should be handled under Process #1, a GTHL staff member designated by the GTHL's Executive Director will appoint a Mediator who may:
 - (a) ask the Complainant, Affected Party and/or the Respondent, as deemed appropriate, for either written or oral submissions regarding the Complaint in the form of a Mediation brief; and
 - (b) convene the Parties to a meeting, either in person or by way of video or teleconference, for the purpose of resolving the matter upon the agreement of the parties without the need for a formal hearing.
15. The GTHL staff member designated by the GTHL's Executive Director will ensure that the individual selected to serve as the Mediator does not have any real or perceived conflict of interest with any Party or any other individual or organization which could be impacted by the outcome of the Complaint.
16. The Mediator will encourage the parties to resolve the Complaint consensually. Complaints which are successfully resolved through this process shall be memorialized in a written agreement to be signed by the Parties, or their parent, guardian or other adult representative if they are a Minor.
17. After being advised of a resolution by the Mediator, the GTHL will keep a record of the written agreement indefinitely.
18. If the Complainant is a Minor and their parent, guardian or other adult representative was involved in submitting the Complaint, the Mediator will communicate through that Party's parent, guardian, or other adult representative. In those circumstances, the Mediator will always communicate with Respondents through the Party's parent, guardian, or other adult representative.
19. If the Mediation does not result in an agreed resolution, a GTHL staff member designated by the GTHL's Executive Director will refer the matter to an Investigation or Adjudicative Panel Hearing.

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Process #2 – Investigation

20. A GTHL staff member designated by the GTHL's Executive Director will direct that the Complaint be investigated by a qualified independent investigator of their choosing. Although each investigator's mandate will be determined individually, they will be instructed by the GTHL to conduct their investigation in accordance with the investigation guidelines found at Schedule "A" to this Policy.
21. A GTHL staff member designated by the GTHL's Executive Director may request any GTHL Member who is not a Party to participate in an investigation. Failure to cooperate may be considered by the Adjudicative Panel in determining whether an infraction, breach or violation has occurred and, if so, the sanctions to be imposed.
22. After the investigation is complete, the GTHL may:
 - (a) If the Complaint contains allegations which, in the discretion of the GTHL, appear not to amount to Maltreatment, Harassment, Bullying or Misconduct, the GTHL will determine whether the Complaint should be directed to the appropriate GTHL Member for adjudication, or to the GTHL Executive Director for a decision, or directly to an Adjudicative Panel hearing as per (b) outlined below.
 - (b) If the Complaint contains allegations which, in the discretion of the GTHL, appear to amount to Maltreatment, Harassment, Bullying or Misconduct, the GTHL Executive Director can make a decision, or the League will appoint an Adjudicative Panel of up to three GTHL directors, select one member of the panel to serve as the chair, and coordinate all administrative aspects of the process and set reasonable timelines.

Process #3 – Adjudicative Panel Hearing

23. A GTHL staff member designated by the GTHL's Executive Director will ensure that the individuals selected to serve as the Adjudicative Panel do not have any real or perceived conflict of interest with any Party or any other individual or organization which could be impacted by the outcome of the Complaint.
24. The Adjudicative Panel will be provided with a copy of the report of the independent investigator, together with the parties' written submissions.
25. If the circumstances of the Complaint are such that adhering to any timelines initially set by the GTHL will not allow a timely resolution to the Complaint, the GTHL staff member designated by the GTHL's Executive Director may direct that these timelines be revised.
26. The Adjudicative Panel will then decide the format under which the Complaint will be heard. The format of the hearing will normally be in writing but may be supplemented by an oral in-person hearing, an oral hearing by telephone or video conference call or a

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combination of these methods.

27. In setting the format for the matter, the Adjudicative Panel will keep in mind the impact the selected procedure may have on the Complainant. For instance, the format selected should avoid requiring the Complainant to re-tell their version of events multiple times throughout the course of the proceedings, except in very exceptional circumstances.
28. If any Party is a Minor, the Adjudicative Panel will communicate through that Party's parent, guardian, or other adult representative wherever possible, but the Minor is entitled to speak at the hearing and may be asked questions directly.
29. The hearing will be governed by the procedure that the Adjudicative Panel deems appropriate under the circumstances. The following guidelines will apply to all hearings:
 - (a) The Parties will be interviewed by the independent investigator and will have an opportunity to provide the independent investigator with their oral evidence, relevant documents, and list of witnesses with relevant information that they feel should be interviewed by the independent investigator.
 - (b) The role of the independent investigator is to determine the facts, based on their interviews of the relevant witnesses and review of relevant documents provided to them by the GTHL and the Parties, and to prepare a written report setting out their findings of fact and evidence in support.
 - (c) The Parties will be provided with a copy of the report of the independent investigator and will have an opportunity to provide written submissions responding to the contents of the report.
 - (d) Both parties will be provided with written submissions from either side and have the opportunity to respond to the respective submissions.
 - (e) The Adjudicative Panel will be provided with a copy of the report of the independent investigator, together with the parties' written submissions.
 - (f) The role of the Adjudicative Panel is to determine whether based on the facts, as found by the independent investigator in their written report and taking into account the written submissions of the Parties, there was a breach of a GTHL, OHF or Hockey Canada Rule or Policy, and if so, what if any sanction should be imposed. Accordingly, an Adjudicative Panel should avoid duplicating work already accomplished by the independent investigator unless the Adjudicative Panel feels that it requires additional information or clarification of that information, there is a serious flaw evident in the report of the independent investigator, and/or the investigator's conclusions appear to be unreasonable to the Adjudicative Panel.

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- (g) The Adjudicative Panel shall determine the matter on the written record provided to it, unless it determines, in its sole discretion, that it wishes to receive further oral evidence or submissions from the Parties or an independent investigator.
- (h) If the Adjudicative Panel has questions for an independent investigator or the Parties, the Panel may direct questions to them in writing. Copies of the questions and answers shall be provided to the Parties, who will have an opportunity to provide further written submissions responding to any of the answers provided to the Adjudicative Panel's questions.
- (i) In the event an oral hearing is deemed to be required, the Parties will be given reasonable notice of the day, time, and place of the hearing.
- (j) If a Party chooses not to attend the hearing after being requested to do so, the Adjudicative Panel may take this fact into consideration in rendering its decision.
- (k) The Parties may engage a representative, advisor, or legal counsel at their own expense to represent them in all written and oral submissions.
- (l) A Complainant or Affected Party who is a Minor, is encouraged, but not required, to attend or participate in an oral hearing, if held. If they choose to attend, their parent, guardian or other adult representative should be in attendance with them.
- (m) After hearing the matter, the Adjudicative Panel will determine whether an infraction, breach or violation has occurred and, if so, the sanctions to be imposed. The decision will be made by a majority vote of the Adjudicative Panel. The Adjudicative Panel's written decision, with reasons, will be distributed to all Parties by the GTHL.

30. In fulfilling their duties, the Adjudicative Panel and the GTHL may obtain independent legal or other professional advice at any stage of the proceeding.

Process #4: Educational Support

Purpose: To address concerns through education, awareness, and behaviour change, with a focus on restoring relationships and preventing recurrence where appropriate.

When does this apply?

- When the complainant selects this process as their preferred resolution option.
- When the matter has been assessed (by the GTHL department) as appropriate for an educational and/or restorative approach.

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- When the matter does not involve sexual harassment or allegations of *serious misconduct, ongoing risk of harm, or situations requiring formal investigation or immediate protective measures.
31. Step 1: The complainant requests an Educational Support session for the parties involved. This may apply to an individual player and their parents/guardians, a coach, or an entire team.
 32. Step 2: The respondent must agree to participate in good faith. Participation does not constitute an admission of wrongdoing.
 33. Step 3: Once agreement is confirmed, the session will be scheduled within 14 days.

Section 4 – How Will Sanctions Be Determined?

34. The fundamental purpose of sanctions is to protect the GTHL community and to contribute to respect for the GTHL, OHF and Hockey Canada Rules and Policies and the maintenance of a fun, fair and safe playing environment by imposing just sanctions that have one or more of the following objectives:
 - (a) to punish and denounce violations of the GTHL, OHF and Hockey Canada Rules, Policies and the codes of conduct and the harm done to others that is caused by such violations;
 - (b) to deter the offender and other persons from committing such violations;
 - (c) to assist in rehabilitating offenders; and
 - (d) to promote a sense of responsibility in offenders, and acknowledgment of the harm done to others.
35. Where the Adjudicative Panel imposes a penalty for an offence that involved the abuse of a person under the age of eighteen (18) years, it shall give primary consideration to the objectives of denunciation and deterrence of such conduct.
36. Where the Adjudicative Panel imposes a penalty for an offence against any official, it shall give primary consideration to the objectives of denunciation and deterrence of such conduct.

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37. Any sanction imposed must be proportionate to the gravity of the offence and the degree of responsibility of the offender. Progressive discipline may be appropriate but is not required. A single incident may justify elevated or combined sanctions.
38. An Adjudicative Panel that imposes a sanction shall also take into consideration the following principles:
 - (a) a sanction should be increased or reduced to account for any relevant aggravating or mitigating circumstances relating to the offence or the offender, and, without limiting the generality of the foregoing:
 - (i) evidence that the offence was motivated by bias, prejudice or hate based on race, national or ethnic origin, language, colour, religion, sex, age, mental or physical disability, sexual orientation, or gender identity or expression, or on any other similar factor;
 - (ii) evidence that the offender, in committing the offence, abused a person under the age of eighteen (18) years;
 - (iii) evidence that the offender, in committing the offence, abused a position of trust or authority in relation to the victim; and
 - (iv) evidence that the offence had a significant impact on the victim, considering their age and other personal circumstances, including their health and financial situation.
39. After considering the factors listed in paragraphs 29 to 33 above, the Adjudicative Panel may apply the following sanctions, singularly or in combination:
 - (a) **Verbal or Written Warning** - A verbal reprimand or an official, written notice that a Participant has violated an applicable Rule, Policy, or code of conduct and that more severe sanctions will result should the Participant be involved in other violations.
 - (b) **Education** - The requirement that a Participant, and other Participants as the Adjudicative Panel may direct, undertake specified educational or similar remedial measures to address the violation(s).
 - (c) **Probation** - Should any further violations occur after the Participant has received a verbal or written warning, this will result in additional disciplinary measures, likely including a period of suspension or permanent ineligibility. This sanction can also include loss of privileges or other conditions, restrictions, or requirements for a specified period.

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- (d) **Suspension** - Suspension, either for a set time or until further notice, from participation, in any capacity, in any program, activity, event, or competition sponsored by, organized by, or under the auspices of the GTHL. The reinstatement of a suspended Participant may be subject to certain restrictions or contingent upon the Participant satisfying specific conditions imposed by the Adjudicative Panel.
 - (e) **Eligibility Restrictions** - Restrictions or prohibitions from some types of participation but allowing participation in other capacities under strict conditions.
 - (f) **Permanent Ineligibility** - Ineligibility to participate in any capacity in any program, activity, event, or competition sponsored by, organized by, or under the auspices of the GTHL for the remainder of the Participant's life.
 - (g) **Other Discretionary Sanctions** - Other sanctions may be imposed, including, but not limited to, other loss of privileges, no-contact directives, or other restrictions or conditions as deemed necessary or appropriate.
40. Sexual Maltreatment involving a Minor Complainant shall carry a presumptive sanction of permanent ineligibility. It is expected that such Misconduct and other Serious Misconduct, would fall under the jurisdiction of, and be adjudicated by, the ITP, and would not need to be referred to the GTHL for adjudication.
41. Unless the Adjudicative Panel decides otherwise, any disciplinary sanctions will begin immediately and will remain in place pending the result of any appeal sought by the Respondent.
42. In addition to being subject to disciplinary action pursuant to this Policy, an employee of the GTHL who is a Respondent to a Complaint may also be subject to consequences in accordance with the employee's employment agreement or policies for human resources, if applicable. Such discipline may take place prior to any determination of a Complaint handled pursuant to this Policy.

Section 5 – Can A Decision Be Appealed?

43. The decision of an Adjudicative Panel may be appealed to the OHF in accordance with [OHF Regulation 6: Dispute Resolution Appeals](#).

Section 6 – Is the Complaint Management Process Confidential?

44. The Complaint Management Process is confidential and involves the Parties, the Adjudicative Panel, the independent investigator, GTHL office staff and any independent advisors to the Adjudicative Panel and the GTHL. Once initiated and until a decision is released, none of the Parties will disclose confidential information relating to the discipline

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or complaint to any person not involved in the proceedings except to obtain legal advice or unless required by law.

45. There may be situations where the GTHL is required to notify an organization such as the relevant Club or Team, the OHF, Hockey Canada, an international federation, law enforcement, insurers, Sport Canada, OSIC or other agencies as required by law that a complaint alleging a breach of the UCCMS, or another relevant GTHL, OHF or Hockey Canada Rule, Policy or Code of Conduct has been filed and proceedings have been initiated. Even where such disclosure is required, all aspects of the Complaint will still be managed by the GTHL in accordance with this Policy.
46. Any failure to respect the confidentiality requirement may result in sanctions, including without limitation, a dismissal of the Complaint or discipline by the Adjudicative Panel.

Section 7 – How Will Decisions Be Recorded?

47. After being advised of a decision by the Adjudicative Panel, the GTHL will keep a record of the decision indefinitely.
48. Any decision rendered in accordance with this Policy may, at the discretion of the GTHL, be shared with other organizations, including the relevant Club or Team, the OHF, Hockey Canada, the GTHL Members, OSIC, Sport Canada, as well as other local, regional, or national sports organizations, multi-sport organizations, or provincial/territorial sports organization.
49. The Adjudicative Panel will determine whether the decision is to be made public beyond those entities listed in paragraph 43.
50. The GTHL will also:
 - (a) Provide copies of discipline and appeal decisions to the relevant GTHL Member with which the Respondent is affiliated.
 - (b) Recognize and enforce the disciplinary sanction imposed by a GTHL Member or any other organization that falls under the jurisdiction of the OHF or Hockey Canada.



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Appendix A – Investigation Procedure

Determination

1. When a Complaint is submitted pursuant to the Policy, a GTHL staff member designated by the GTHL's Executive Director will determine if the incident should be investigated.

Investigation

2. The GTHL staff member designated by the GTHL's Executive Director will appoint an investigator. The investigator must be an independent third-party skilled in investigating. The investigator must not be in a conflict-of-interest situation and should have no connection to any Party or any other person or organization which may be impacted by the matter.
3. The investigator should be mindful as to whether federal and/or provincial legislation related to workplace harassment may apply, given the context of the Complaint.
4. Where a Party is a Minor, the investigator should direct all correspondence for that Party through the Minor's guardian, parent, or other adult representative wherever possible.
5. If the subject-matter of the Complaint is also being investigated by law enforcement, the investigator may be required to pause their investigation if asked to do so by law enforcement.
6. The investigation may take any form as decided by the investigator, guided by any applicable federal and/or provincial legislation where in place. The investigation may include:
 - (a) Interviews with the Complainant;
 - (b) Witness interviews;
 - (c) Statement of facts (Complainant's perspective) prepared by the investigator, acknowledged by the Complainant, and provided to the Respondent;
 - (d) Interviews with the Respondent; and/or
 - (e) Statement of facts (Respondent's perspective) prepared by the investigator, acknowledged by the Respondent, and provided to the Complainant.



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Investigator's Report

7. Upon completion of their investigation, the investigator shall prepare a report that should include a summary of evidence from the Parties (including both statements of facts, if applicable) and other witnesses. The investigator may make determinations of fact, i.e., what happened, but is not required to do so. They may not make determinations as to whether those facts constitute breach of a GTHL, OHF or Hockey Canada Rule, Policy, or Code of Conduct.
8. The investigator's report will be provided to the GTHL staff member designated by the GTHL's Executive Director, who will disclose it to the Adjudicative Panel. The GTHL staff member designated by the GTHL's Executive Director shall also disclose the investigator's report – or a redacted version to protect the identity of witnesses, if appropriate – to the Parties.
9. Should the investigator find that there are possible instances of offence under the *Criminal Code* or constitute child abuse under the relevant provincial legislation, the investigator shall advise the Complainant and the GTHL that they must refer the matter to police.
10. The presumption will be that the investigation report is determinative of the facts related to the Complaint. This presumption may be rebutted where a Party who does not agree with the findings of the report can demonstrate that there was a significant flaw in the process followed by the investigator, and/or that the investigator's conclusions were unreasonable. In situations where the presumption is rebutted, the Adjudicative Panel shall determine to what extent the investigation report will be accepted as evidence and to what extent a witness or Party may be required to give fresh evidence at a hearing.

Reprisal and Retaliation

11. Anyone who submits a Complaint or who gives evidence in an investigation shall not be subject to reprisal or retaliation from any individual or group. Any such conduct may be subject to disciplinary proceedings pursuant to this Policy.

False Allegations

12. A Participant who submits allegations that the investigator determines to be malicious, false, not made in good faith, or made for the purpose of retribution, retaliation or vengeance may be subject to a Complaint under the terms of this Policy and may be



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required to pay for the costs of any investigation that comes to this conclusion and be subject to other sanctions, including but not limited to suspension or permanent ineligibility. The GTHL, any Member or the Participant against whom the allegations were submitted, may act as the Complainant.

Confidentiality

13. The investigator will take all reasonable efforts to protect the identities of the Complainant and the Respondent throughout their investigation. However, the GTHL, its Members and Participants recognize that maintaining full anonymity during an investigation may not be feasible.