

## APPENDIX A

### THE SITE FOR CONTEMPORARY PSYCHOANALYSIS CODE OF ETHICS AND CONDUCT

*Pertaining to how members carry out their clinical work with patients  
and relating to the associated Complaints Procedure*

*EXPLANATORY PREFACE 7 July 2015, revised 10 July 2016*

1. This preface is not a constituent part of the document/section entitled *Complaints Procedure* ("CP").
2. This preface is intended only as an explanatory guide, concerning the applicability of CP within The Site for Contemporary Psychoanalysis ("The Site").
3. CP must be understood within the context of two separate documents entitled *Members Code of Conduct* and *Code of Ethics and Conduct* which is binding on all members of The Site, whether or not they are registered with or are members of the United Kingdom Council for Psychotherapy ("UKCP").
4. CP will normally apply only to members of The Site who are not registered with nor are members of UKCP. It will not normally apply to members of The Site who are so registered.
5. Any complaint against a member of The Site should be submitted to The Site in the first instance. The chair of the Site ethics committee will begin an informal dispute resolution. This would include a discussion of the key concerns outlined by the complainant, and possible courses of action at their disposal. If the complaint is about a member of The Site who is also registered with UKCP, one of the outcomes of the informal dispute resolution will normally be for the complainant to be referred to the UKCP Complaints and Conduct Process (UKCPCCP). The Site will, to the extent that this may be required, carry out such action as may become necessary in order to comply with the outcome of such UKCPCCP proceedings. If the complaint is about a member of the Site who is not registered with UKCP, one of the outcomes of the informal dispute resolution will normally be for the complainant to be referred to The Site Complaints Procedure (CP). The chair of the ethics committee is responsible for holding an up-to-date register of Site members' registrations with UKCP.
6. It is understood that, as of the date of this explanatory preface, UKCP will not entertain any complaint against any member of The Site who is not registered with or a member of UKCP at the date on which such complaint is initiated.
7. It should be noted that as of the date of this explanatory preface, there exist no current provisions of UKCP pursuant to which any final appeal to UKCP might follow in respect of any complaint initiated pursuant to CP.
8. In the event that the situation outlined in 6 and 7 above should change, a new explanatory preface to CP will be issued outlining any such change.

**CODE OF ETHICS AND CONDUCT OF THE SITE FOR CONTEMPORARY PSYCHOANALYSIS  
incorporating the mandatory standards of conduct (code of practice)**

**PART 1: INTERPRETATION**

- 1.1 In this Code of Ethics and Conduct where the context so admits:
- (a) "The Site" shall mean The Site for Contemporary Psychoanalysis
  - (b) "Member" shall mean a person admitted to membership of The Site
  - (c) "Patient" shall mean a person who is being or has been treated in psychotherapy by a member
  - (d) "Ethics member" shall mean a member of the Ethics Committee including the Chair
  - (e) "The Council" shall mean the Council of The Site.
- 1.2 The headings of the parts of the Code of Ethics are descriptive and explanatory only and do not form part of the said code.

**PART 2: MANDATORY STANDARDS OF CONDUCT (code of practice)**

2.1 Best Interests of the Patients

2.1.1 A member shall prior to any person becoming their patient disclose to such person the terms and conditions of the contract between the member and such person and where appropriate their interests and principles of practice.

2.1.2 Save in respect of professional fees a member shall not have any dealings with their patient, which might result in any financial or other benefit to the member.

2.1.3 A member shall carefully consider the possible implications of entering into dual or multiple relationships. For example, a dual or multiple relationships could include a social or a commercial relationship with the patient, or a supervisory relationship that runs alongside a therapeutic one. Where dual or multiple relationships are unavoidable, for example, in small communities, the member shall take responsibility to maintain the boundaries and confidentiality of the psychotherapeutic relationship as set out in this Code.

2.1.4 A member shall not invite nor commit any sexual act with or in the presence of their patient.

2.1.5 Save where restraint is necessary (in which case only the minimum amount of force necessary in the circumstances shall be used) a member shall not commit an act of physical violence against a patient.

2.1.6 A member undertakes to know and understand the legal responsibilities concerning the rights of children and vulnerable adults and to take appropriate action should the member consider a specific child or specific vulnerable adult is at risk.

## 2.2 Diversity and Equality

2.2.1 A member accepts that a personal prejudice they knowingly hold about the patient's gender, age, colour, race, disability, sexuality, social, economic or immigration status, lifestyle, religious or cultural beliefs is likely to have an adverse affect on the way they relate to the patient or to colleagues and others.

2.2.2 A member shall actively consider the area of diversities and equalities as part of their continuing process of self-enquiry and professional development.

## 2.3 Confidentiality

2.3.1 A member shall owe their patient the duty of confidentiality save where (a) there is a mandatory legal requirement to disclose; (b) the safety of the patient or of others is at risk; (c) wherever appropriate, the prior written consent by the patient to disclosure of material has been obtained provided that such consent may be oral where the disclosure is limited to informing the patient's doctor that the patient is in treatment with the member; (d) the use of patient material is customary in the course of normal psychotherapeutic practice including clinical training, supervision, teaching and clinical case discussion among colleagues. In the case of (c) and (d) above all necessary steps must be taken where there is disclosure of material relating to a patient to ensure that the identity of the patient is concealed.

2.3.2 A member shall, where required so to do by their patient, inform their patient of the exceptions to the duty of confidentiality specified in paragraph 2.3.1, above.

2.3.3 The use of current or former patient clinical material is customary in the course of psychotherapeutic practice, e.g. in clinical training, supervision, teaching and clinical case discussion among colleagues. In these instances the member shall take all necessary steps to ensure the anonymity of the current or former patient.

2.3.4 A member commits to clarifying with patients the nature, purpose and conditions of any academic research for publication in which the patients are to be involved and to ensuring that informed and verifiable consent is given before commencement of the research.

2.3.5 Should a member be required by law to serve in judicial or administrative proceedings they commit to getting clarification at the outset of the potential impact this could have on their commitment of confidentiality to any client. In such a situation a member commits to maintaining this clarification as the situation proceeds and to seek legal and ethical advice, as appropriate.

2.3.6 A member may keep such records as they consider necessary to facilitate their psychotherapeutic work with the patient. Any personally identifiable records shall be stored or disposed of securely to preserve the confidentiality of the patient.

## 2.4 Professional Knowledge, Skills and Experience

2.4.1 A member shall take the necessary steps to maintain their ability to practise competently and, to this end, shall commit to an ongoing process of professional and personal enquiry as may, from time to time, be set out in the Continuing Professional Development (CPD) policy of The Site.

2.4.2 A member shall not knowingly seek to practise beyond the limits of their knowledge, experience or skills.

2.4.3 A member shall exercise their clinical judgement as to whether or when to seek supervisory and/or other clinical support and advice.

2.4.4 A member shall, if requested to do so, disclose their qualifications to practice psychotherapy to any prospective patient or to any person having a legitimate interest in such information and requesting the same and shall not claim or imply that they possess qualifications which they do not have.

## 2.5 Conduct

2.5.1 Within the terms of current legislation, if a member shall have been convicted of a criminal offence punishable by imprisonment (whether or not a sentence of imprisonment shall have been imposed), or shall have had civil proceedings commenced against them by their patient, or being a medical practitioner shall have had proceedings commenced against them by the General Medical Council, they shall without delay inform the Chair of the Ethics Committee in writing of the relevant facts.

2.5.2 A member shall not treat a patient if the member is (a) by reason of physical or psychological illness or ageing incapable of exercising proper skill and judgement or (b) under the influence of alcohol or drugs.

2.5.3 A member shall appoint a named person who shall contact their patients in the event of their sudden incapacity for any reason (as stated in 2.5.2, above) or in the event of their death.

2.5.4 Subject to the rules of confidentiality and other code of ethics adhered to by a member, they commit to cooperating with any lawful investigation or enquiry relating to their capacity to carry out their psychotherapy practice effectively. Good practice would indicate that a member should consult with a colleague or member of the Ethics Committee, or seek legal advice with regard to a request for information by anyone involved in a legal case where the client has given their consent.

## 2.6 Advertising

2.6.1 A member shall not advertise to the public in a manner where any advertisement contains inaccurate or untruthful material or makes false claims.

2.6.2 No member shall make false claims as to their training or skills nor use personal testimonials.

## 2.7 Indemnity Insurance

A member shall maintain continuous professional indemnity insurance against such risks as The Site may from time to time require and shall pay all premiums promptly and shall comply with all requirements of the insurers in respect thereof.

### **PART 3: FUNCTIONS AND POWERS OF THE ETHICS COMMITTEE**

The functions and powers of the Ethics Committee shall be:

1. To receive all potential complaints under the Organisational Complaints (Grievance) Procedure alleging any breach by a member of the mandatory standards of conduct set out in Part 2 of the Members' Code of Conduct (see Appendix B, Members' Code of Conduct and Organisational Complaints [Grievance] Procedure).
2. To receive any complaints pertaining to clinical work against UKCP and non-UKCP members of The Site, and Site trainees, in the first instance. The Chair of The Site Ethics Committee will normally begin an informal dispute resolution process. This would include a discussion of the key concerns outlined by the complainant, and possible courses of action at their disposal. If the complaint is about a member of The Site who is also registered with UKCP, one of the outcomes of the informal dispute resolution will normally be for the complainant to be referred to the UKCP Complaints and Conduct Process (UKCPCCP). If the complaint is about a member of The Site who is not registered with UKCP, one of the outcomes of the informal dispute resolution will normally be for the complainant to be referred to the Site Complaints Procedure (CP). The Chair of the Ethics Committee is responsible for holding an up to date register of Site members' registrations with UKCP.
3. To receive written complaints under the Complaints Procedure alleging any breach of the Code of Ethics and Conduct by any member of The Site who is not UKCP registered and by any trainee.
4. In the case of 3.3, to decide whether such complaints disclose a prima facie case to answer in respect of the member or trainee about whom a complaint is made.
5. In complaints where there is a prima facie case to answer, the Ethics Committee will follow the procedures as set out below in the Complaints Procedure.

### **PART 4: PROCEDURE WHERE COMPLAINT IS MADE AGAINST A MEMBER (COMPLAINTS PROCEDURE "CP")**

- 4.1 For the purposes of this Part of the Code a complaint against a member alleging a breach of Part 2 of the Code of Conduct and/or Part 2 of the Code of Ethics [collectively referred to as the "Code"] may be initiated only by a patient of that member, or by a member of The Site (hereinafter referred to as the "complainant"). If the complaint is accepted then the procedures laid down in this code should be followed.

4.1.1 Any such complaint against a member shall be made in writing and addressed to The Chair of the Site or the Secretary of The Site who shall without delay forward a copy of such written complaint to the Chair of the Ethics Committee.

4.1.2 No such complaint may be made in respect of events that occurred more than three years prior to the complaint being received by The Site. Complaints in respect of events that occurred more than three years prior to the complaint being received may be heard if the law of the land has been broken or, if in the view of the Ethics Committee, it can be construed that the complaint alleges gross professional misconduct and it is in the interest of the public that it be heard.

4.2 The Chair of the Ethics Committee shall normally within five working days of the receipt of any complaint acknowledge it (with exception of holiday periods when it may be 10 working days). The Chair of the Ethics Committee shall normally contact the complainant by telephone. The Chair of the Ethics Committee shall explain to the complainant the limited purpose of their communication, which is to: a) ascertain if an informal resolution of the potential complaint is possible and b) inform the complainant that procedures are in place should a full hearing be required and that complaints against Site members who are UKCP registrants are subject to the UKCP Complaints and Conduct Process and complaints against Site members who are not UKCP registrants are subject to the Site's Complaints Procedure. If the complainant decides to make a formal complaint against a Site member who is not a UKCP registrant, then the Chair of the Ethics Committee, in conjunction with the Ethics Committee, will determine within 21 days of acknowledgement of receipt of complaint whether there is a prima facie case to answer in respect of the said complaint and shall immediately after such determination inform in writing the Chair of The Site of such a decision. These time scales are subject to holiday periods: please see Note 1 (p. 17).

4.2.1 Any such determination that there is a prima facie case to answer in respect of a complaint shall be either unanimous or by a majority.

4.2.2 If there is a prima facie case to answer the Ethics Committee shall appoint an Ethics Panel to hear the complaint.

4.2.3 The Ethics Panel shall act in accordance with and follow the procedures as laid down in this Code.

- (a) The quorum of the Ethics Panel shall be not less than three members;
- (b) The Ethics Panel must include one psychotherapist who is a member of a CPJA member organisation or a member of CPJA (UKCP direct member);
- (c) The Ethics Panel must include one lay member who is not a practising psychotherapist;
- (d) Any conflict of interest with regard to the complaint(s) must be declared and such conflict of interest will render such person(s) ineligible to sit on the Ethics Panel;
- (e) The Ethics Panel must have at least one member from the Site. This/these member(s) must not be a member(s) of the Ethics Committee;

4.3 For the purpose of carrying out its duties to determine whether any complaint discloses a prima facie case for the Respondent to answer the Ethics Committee shall:

4.3.1 Base its determination solely on the written complaint submitted by the complainant together with such further and better particulars as may be elicited by the Committee under the provisions of (2) of this paragraph.

4.3.2 Have no power to interrogate or question either the Complainant or the Respondent or to otherwise investigate the nature or merits of such complaints save that where the nature of the complaint is unclear or where it is not specified which provision(s) of the Code is /are alleged to have been breached then the Committee may (in writing) request the complainant to provide such further and better particulars of the complaint as may be sufficient to establish the nature of the complaint and/or the provision(s) of the Code alleged to have been breached

4.4 If the Ethics Committee in its discretion is satisfied that the complaint discloses a prima facie case to answer it shall forthwith send written notice of its decision to the complainant and respondent together with copies of any documents considered by the Ethics Committee but not yet seen by the complainant or respondent. The Ethics Committee will also send written particulars of the date, time and place at which the complainant and respondent shall be requested to attend before the Ethics Panel convened in accordance with the rules set out above such date to be not less than 21 days from the date of the notice.

4.5 In the event that both the complainant and respondent appear before the Ethics Panel in accordance with the provisions of paragraph 4 above, the Ethics Panel shall invite both parties to meet with a clinical member of The Site who has a minimum of five years post-qualification experience. This person must not be a member of the Ethics Committee nor the Council. They will explore the possibility of mediation and specify a further date within 42 days when both parties shall be required to attend again before the Ethics Committee.

4.6 In the event that the parties shall agree to meet a person designated by the Ethics Panel for the purpose of mediation, such person shall take no part whatsoever in the proceedings before the Ethics Panel nor have any contact whatsoever with any member of the Ethics Panel or the Council at any time in connection with any aspect of the complaint that is before the Ethics Panel.

4.7 The mediation process shall be referred to an independent Mediation Service, as appointed by The Site Council. Conciliation may proceed to, or be combined with, arbitration leading to determination as agreed with the Mediation Service. The mediation process shall commence as soon as it can be arranged with the Mediation Service.

4.7.1 Attendance at independent Mediation shall be paid by The Site for as many hours as approved by The Site Council and The Site Treasurer in consultation with the Mediation Service, thereafter at the parties' own expense.

4.7.2 The Chair of The Site or a designated deputy shall specify a further date within 28 days when both parties shall be required to attend again before them.

4.7.3 In the event of both parties agreeing to participate in any mediation procedure as herein before provided, the Chair of The Site or the designated deputy shall, when the parties again appear before them, enquire whether any agreement has been reached between the complainant and respondent.

- 4.7.4 As agreement by such mediation is final, no adjudication by The Site is then required. A brief mediation report will need to be agreed by both complainant and respondent. A record of this mediation report will be retained by The Site.
- 4.8 In the event that both the complainant and respondent shall not appear before the Ethics Panel as requested or in the event that there is no agreement to participate in the mediation procedure herein before specified then the Ethics Panel shall on the first occasion on which the Complainant and Respondent are requested to appear before it direct that the complaint shall proceed to adjudication.
- 4.9 When the Ethics Panel decides or directs that any complaint shall proceed to adjudication it shall within five working days thereof send written particulars to the complainant and respondent of the date time and place proposed for the adjudication such date to be within 42 days of the date on which the said written particulars are sent.
- 4.10. The Ethics Panel shall hear and determine any complaint that it has decided or directed should proceed to adjudication. Any such determination shall be by a decision of those members of the Ethics Panel who are present which is either unanimous or by a majority.
- 4.11 Where the Ethics Panel deem it appropriate, the Ethics Panel may commission reports from experts of the Ethics Panel's own choosing concerning the respondent's/re-applicant's fitness to practice, such reports to be paid for by the respondent/re-applicant .
- 4.12 The Ethics Panel may hear and determine the complaint notwithstanding the failure of the complainant or the respondent to attend provided that if the respondent shall have failed to attend, the Ethics Committee shall first be satisfied that they received or should have received the notice referred to in Part 4 paragraph 4 hereof.
- 4.13 The proceedings of the Ethics Committee and/or the Ethics Panel shall in all respects accord with the principles of natural justice as recognised by English Law.
- 4.14 The Ethics Committee and/or the Ethics Panel may at any stage of their deliberations appoint any person suitably qualified to advise the Ethics Committee and/or the Ethics Panel on any matter arising and if considered necessary to attend the hearing to give such advice. The costs of such advice shall in all cases be payable by The Site and shall be referred to the Council.
- 4.15 The complainant and the respondent may at any stage of the hearing at their own expense (whether by themselves, their lawyer or other chosen representative) make submissions, give oral evidence to the Ethics Panel, call witnesses and cross-examine the other party or their witnesses save that the respondent shall have the right to remain silent if they so wish or are so advised. At the conclusion of the evidence the complainant and the respondent may make representations to the Ethics Panel.
- 4.16 Documents which are to be relied on or presented as evidence by the complainant or respondent should be sent to the Ethics Panel and the other party at least 14 days before the hearing. Such documents shall be formally produced at the appropriate point in the hearing by the party relying on them. The producer of such documents may be examined and

cross-examined on the content and implications of such documents.

- 4.17 The burden of proof on the complainant at the adjudication shall be that which is applicable in civil proceedings in England and Wales namely that the complaint is established to be more likely than not.
- 4.18 The conduct of the hearing, the length of the evidence and the admissibility of evidence shall in all respects be determined by the Ethics Panel.
- 4.19 No member of The Site shall sit on the Ethics Panel to deal with any complaint where there is likely to be some conflict of interest.
- 4.20 A quorum of the Ethics Panel shall consist of not less than three members. In cases where there would otherwise be no quorum, the Ethics Committee (not the Ethics Panel) shall appoint further Panel members.
- 4.21 Contemporaneous written records of the complaints procedure must be documented, kept and securely stored at all times according to Site data protection procedures. The hearing may also be audio-recorded and a record kept and securely stored in line with Site data protection procedures.

#### **PART 5: DISCIPLINARY ACTION AND APPEALS PROCEDURES**

- 5.1 If the Ethics Panel shall be satisfied that the complaint has been proved and that a breach of the Code has been committed by the respondent, it may take one or more of the following courses of action in respect of the respondent:
  - 5.1.1 Issue a written warning as to the possible consequences of future conduct in such form as it shall consider appropriate;
  - 5.1.2 Require them to be supervised by a practitioner with more than five years post qualifying experience to be approved by Council for such term as stipulated by the Ethics Panel;
  - 5.1.3 Recommend them to attend further therapy with a practitioner of more than five years postqualifying experience to be approved by Council for such term as is stipulated by the Ethics Panel (see note in 5.1.3);
  - 5.1.4 Suspend them from membership of The Site for such period as it shall consider appropriate;
  - 5.1.5 Expel them from membership of The Site.
- 5.2 The Ethics Panel shall within five working days of the hearing notify the complainant, the respondent and The Ethics Committee and Council of the determination of the Panel and of any disciplinary action taken.

- 5.3 The complainant or the respondent may within 28 days of the date of such notification give written notice to the Council of appeal or review against the decision of the Ethics Panel whereupon the Council shall fix a date for the consideration of the appeal or review and shall notify the Complainant and the Respondent of such date.
- 5.4 Grounds for appeal would normally include the following:
- 5.4.1 Either party may appeal against a decision imposing a sanction on the grounds that it is either unduly lenient or unduly severe.
- 5.4.2 Either party may apply for a review of the decision-making process on the ground that there has been a procedural error as a result of which the decision would cause significant injustice if it were allowed to stand.
- 5.5 Documentation to support a request for an appeal or review must be accompanied by a brief statement as to its relevance to the grounds for appeal or review.
- 5.6. The Ethics Committee shall be empowered in its discretion to set up an ad hoc Appeal Panel to determine any appeal on its behalf provided that such Appeal Panel shall comprise not less than five members of The Site whose qualifications and experience are deemed suitable for the purpose for which those persons are appointed to the Appeal Panel.
- 5.7 At the hearing of the appeal, the complainant and the respondent may make oral or written representations in person or through their representative to the Council or Appeal Panel in support of their appeal. The Appeal Panel shall review a summary of the evidence previously presented and such further evidence which had not been presented at that hearing, and which the Appeal Panel in its sole discretion considers to be relevant to the appeal. The proceedings of the Appeal Panel may be audio recorded.
- 5.8 The Appeal Panel may (a) allow the appeal and quash the decision or the disciplinary action taken by the Ethics Panel or (b) substitute for the disciplinary action imposed by the Ethics Panel some alternative course of action specified in Paragraph 1 of this part of the Code.
- 5.9 For the purposes of receiving any notification provided for under this code or the hearing of an appeal under Part 5 of the Code the Council shall exclude any trainee or student who might otherwise be entitled to attend meetings of the Council.
- 5.10 In the event of any failure by Site (whether through the Ethics Committee, Council or Appeal Panel or any officer or other person or body) to comply with the provisions of the Code then the complainant or respondent shall be entitled to make a complaint concerning such failure to the relevant body within the United Kingdom Council for Psychotherapy (UKCP) in accordance with the regulations from time to time promulgated by the UKCP provided the complainant or respondent shall first have pursued any right of appeal to the Council in accordance with the terms of the Code. Such complaint to the UKCP shall be made within 21 days of the final decisions provided for in the Code.
- 5.11 After the complaint has been upheld and a sanction imposed by the Ethics Panel (Part 5, section 1), which may have been subject to variation by Appeal (Part 5, section 8), the

Ethics Committee shall consider publication of findings and the sanction. In the event of suspension or expulsion from membership, The Site shall within 14 days publish on the Site website the decision, the sanction and the reason for the sanction and the Chair of the Ethics Committee shall inform the UKCP accordingly. In the event of lesser sanctions, the Ethics Committee may not proceed to publication, save where it is construed by the Ethics Panel or Appeals Panel that there is material risk to public safety.

- 5.12 The Ethics Committee shall appoint a member of The Site with 5 years post-qualifying experience in a supervisory role to oversee that the disciplinary actions have been carried out according to the instructions of the Ethics Panel or Appeals Panel, as cited above, and when the terms of the sanctions have lapsed. The appointed person shall inform the Ethics Committee, who shall notify the Chair of Council.

#### **PART 6: SPECIAL PROVISIONS RELATING SOLELY TO TRAINEES**

- 6.1 All trainees of the Site shall be subject to all provisions of the Code (save as herein expressly provided) as if they were full members of The Site but shall not thereby acquire any voting rights in respect of any proceedings of The Site whether at the AGM or otherwise nor be entitled to be elected to the Ethics Committee or Ethics Panel.
- 6.2 So far as the provisions of Part 5 of the Code in respect of disciplinary action are concerned there shall be substituted in relation to trainee's provision for suspension or expulsion from training in lieu of the provision for suspension, or expulsion from membership or lesser sanctions.
- 6.3 In the event of any complaint against a trainee under the terms of the Code, a mentor shall be offered by Council to support the trainee. Such a mentor shall be an appropriately experienced member of The Site but need not be a member of the Training Committee.
- 6.4 In the event of any complaint against a trainee under the terms of the Code, the Ethics Committee shall in addition to the obligations imposed under the Code:
- 6.4.1 Send a copy of the complaint to the Training Committee and at all times keep the Training Committee sufficiently informed of the progress of the complaint;
- 6.4.2 Consult fully with the Training Committee in respect of any disciplinary action contemplated prior to imposing such disciplinary action provided that in all cases the decision of the Ethics Committee and/or Ethics Panel shall be final.

#### **NOTES 1 & 2: THESE ARE APPLICABLE TO BOTH THE ORGANISATIONAL COMPLAINTS (GRIEVANCE) PROCEDURE AND ALSO THE COMPLAINTS PROCEDURE**

##### **Note 1 - Holiday Periods**

Site complaints and grievance hearings or formal or informal meetings and mediations will not be arranged during these holiday periods:  
Months of July and August, 2 weeks over Christmas and 2 weeks over Easter.

**Note 2 - Limit on concurrent procedures**

Site complaints and grievance procedures are run by volunteers in their spare time. There is a limit to the number of complaints and grievances that The Site can run concurrently: 2. The maximum number may at any time be determined jointly by the Chair of Council and the Chair of Ethics Committee. Any complaints and grievances that arrive after this number has been exceeded will be deferred and dealt with on a first come, first served basis giving priority to complaints under the Site's Complaint's Procedure.