CITY OF BRAMPTON

Review Report Debrief

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REVIEW TEAM

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Process Overview

Review Mandate

To conduct an independent and impartial review into the experiences and observations of City employees related to direct, indirect, subtle and systemic discrimination and manifestations of ABR

Spheres of inquiry:
- Employee Experiences and Observations Related to ABR in the Workplace
- Gold Standard Assessment of Policies, Procedures, Processes and Practices

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What is a Workplace Review?

- A **constructive, holistic** process
- Centered on evaluating workplace **practices, policies, and/or procedures**
- Considers **employee perspectives and experiences**
- Assesses the extent to which the organization is meeting its **legal obligations** and abiding by **best practices**
- Provide **recommendations** for how the organization can improve

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Review Status

- Concluded information gathering phase
  - Interviews and focus groups with 32 participants at all levels of the organization
  - Review of extensive documentation

- Concluded assessment and preparation of Report of Findings and Recommendations
  - Employee experiences
  - Systems and processes assessment

The Gold Standard: What Is It?

A proprietary standard of **requirements and best practices**, in light of the applicable legal requirements.

For the purposes of this Review, the Gold Standard served as the benchmark against which the City's **systems, policies, and processes** were assessed.

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The Gold Standard: 10 Key Factors

1. Compliance
2. Process Clarity
3. Conflict Mitigation
4. Communication
5. Procedural Fairness

6. Accountability
7. Competence
8. Capacity
9. Consistency
10. Restoration

Employee Experiences and Observations

Racial Diversity

- Diversity throughout the City's departments and divisions is widely variable

- Black and racialized employees are concentrated at lower levels of the organizational hierarchy

- Within certain departments, Black and racialized employees are most often employed in precarious employment roles

Workplace Environment and Culture

- Many Black participants did not feel that the City has fostered a workplace environment and culture that are supportive of Black staff

- There is a marked difference in perception between Black employees and senior members of leadership and management regarding the supportiveness of the workplace environment for Black and racialized employees

- Most Black and racialized participants shared personal experiences of differential and discriminatory treatment

- Black and racialized participants noted recent improvements in their workplace culture and environment, though a "culture of fear" remains

- White employees are reluctant to engage in dialogue or action about EDI-related issues for fear of being perceived as culturally ignorant or insensitive

Hiring Policies and Procedures

- Hiring policies and practices are inconsistent among departments with respect to their consideration of EDI

- Nepotism is viewed as a significant issue in hiring practices across multiple departments

- Hiring efforts targeted at racialized and/or Black staff are not perceived to be genuine and do not lead to more diverse hires

- Black participants are wary of diversification efforts, which they perceive to be flawed, disingenuous, and ultimately ineffective at yielding more Black hires

- Concerns about hiring do not appear to be held by senior leaders in certain departments

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Career Advancement

- Black employees are particularly disadvantaged in career advancement because of the lack of continuous learning and mentorship opportunities accessible to them

- Internal development and education programs have not been sufficiently socialized to Black employees

- Black employees have struggled to leverage their experience and credentials for the benefit of their careers

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EDI Training and Policies

- Most participants were aware of the City's Respectful Workplace Policy, while few were aware of the Issue Resolution Process

- EDI training has been ad hoc and inconsistently socialized throughout the City

- Most participants spoke positively about EDI training sessions they attended, though some questioned the choice of organizations retained to conduct such training

- EDI training is not mandatory, and there are currently no accountability or follow-up mechanisms in place to ensure that trainees and learners carry out relevant actions to develop and apply the learning they attained

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EDI Training and Policies

- Onboarding processes do not appear to involve a strong EDI component, are inconsistently provided to new employees, and may lead to a patchwork understanding of EDI-related policies and processes

- Part-time staff in some departments are not provided paid time to take EDI training, and the existence of such training opportunities is not regularly communicated to them

- Participants in different departments emphasized the need to focus EDI training efforts on different groups
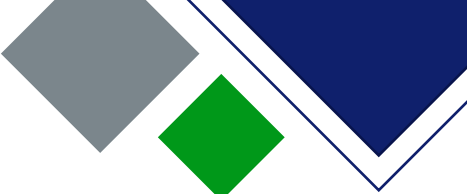
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Existing EDI Initiatives

- Since the commencement of the Review, the City has established the Equity Office to host the existing Unit, staffed the Equity Office, hired a Senior Advisor of Human Rights

- Black employees and members of the Black community within Brampton have formed their own networks and resource groups, each with their own expectations for the City's EDI initiatives

- Existing EDI initiatives are not effectively communicated within the City

- There is a lack of understanding of the purpose, intentions, objectives, integration and/or interrelation among the various EDI initiatives, and a perception that initiatives are ad hoc and disconnected from a larger strategy

- Expectations related to the emergence of employee resource groups have not been communicated or managed

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Collection of Identity-Based Data

- There is a lack of reliable and accessible identity-based employee data

Gold Standard Assessment of Policies, Procedures, Processes and Practices

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Recommendations and Opportunities for Improvement

ABR and EDI in the Workplace

Formulate clear strategies and allocate sufficient resources to EDI initiatives

- Clearly socialize EDI initiatives to the entirety of the City, and tether initiatives to the City's objectives, as set out in a comprehensive and clear phased strategy

- Information about the Equity Office should be thoroughly socialized throughout the organization to set expectations

- Consider continued collaboration between networks and resource groups formed by Black employees and Bramptonians within a unified strategy

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ABR and EDI in the Workplace

Repair ruptures and foster a sense of transparency and trust

- Adopt frameworks and strategies that acknowledge historical and present harms experienced by Black and racialized staff

- Leverage new resources (including the Unit, Equity Office, Human Rights Advisor, and new leadership for HR) for fresh perspectives and opportunity to build trust among employees

- Leverage recent change in HR leadership to create positive change and/or remedy existing deficiencies in HR.

ABR and EDI
in the Workplace

Repair ruptures and foster a sense of transparency and trust

- Ensure the Unit's "ombudsman" or "advisor" function is sufficiently resourced, developed, and clearly delineated with the City's existing complaints and investigation processes

  - Consider assigning this function to the Human Rights Advisor, ideally relocated to a team outside of HR. If the position is moved, endeavor to communicate this move ASAP

- Leverage messaging from the top regarding prioritizing EDI and addressing ABR within the City

ABR and EDI in the Workplace

Improve the recruitment, retention, and advancement of Black employees through data-driven efforts

- Engage in a fulsome, systematic assessment to identify barriers to EDI in hiring processes

- Leverage learning outcomes of FES's efforts to diversify through its departmental recruitment process for firefighters

- Integrate an equity-focused approach to diversity in recruitment processes

- Create pathways of career advancement and progression for Black employees

ABR and EDI in the Workplace

Improve the recruitment, retention, and advancement of Black employees through data-driven efforts *(cont.)*

- Enhance efforts to thoroughly socialize existing opportunities for upskilling

- Collect relevant data to drive and inform EDI efforts, including sociodemographic data on existing employees and job applicants

- Support the development and independence of trusted roles dedicated to EDI related progression

- Integrate questions regarding EDI in one-on-one meetings and exit interviews

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ABR and EDI
in the Workplace

Develop a Code of Conduct that specifically addresses anti-Black harassment and discrimination

At minimum, the Code of Conduct should:

- clearly communicate its commitment to combating ABR in all of its forms;

- describe types of anti-Black conduct, including more subtle forms of harassment and discrimination like microinequities;

- provide information on City initiatives related to Black empowerment and ABR; and

- be linked to related organizational policies and complaints and investigation procedures

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ABR and EDI in the Workplace

Conduct robust and regular training, and implement accountability mechanisms
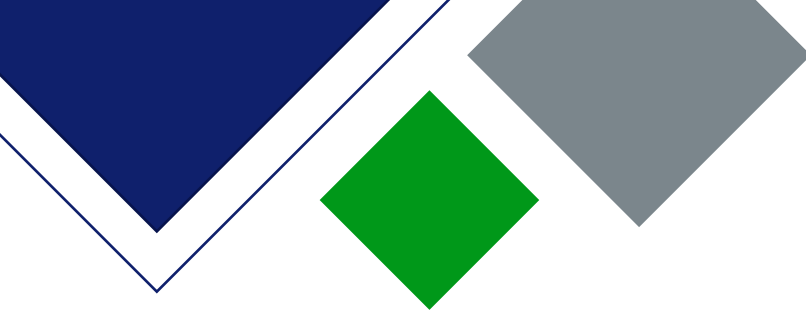
- Ensure consistent, regular training on EDI and ABR issues for all staff, including during onboarding

- Construct training as a modular, structured program with progressive introduction of concepts and content

- Training should address reporting and escalation obligations and methods

- Implement accountability mechanisms to track learning outcomes

- Require senior leaders, managers, and those involved in recruitment processes to engage in more specialized and extensive training

Policies, Procedures, Processes, and Practices

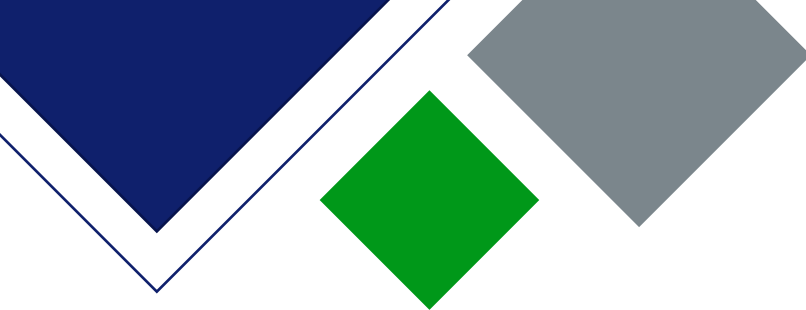## Implement a centralized workplace investigations process

- Implement a single, centralized process for complaints intake
  - Multiple options; consider the Equity Office, but be careful not to overwhelm
- Given current lack of trust in HR, consider establishing a new function or moving the responsibility for investigations to a function that enjoys more employee confidence
- Relocate the Human Rights Advisor role to an office or team outside of HR

Policies, Procedures, Processes, and Practices

Engage in comprehensive data collection related to complaints
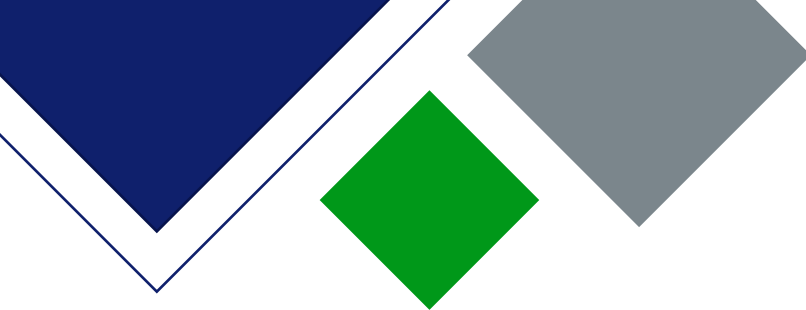
- Implement a centralized system to track workplace harassment or discrimination complaints

- Aggregate and periodically analyze the data, once collected, to determine if there are any trends in certain types of complaints and proactively address issues

Policies, Procedures, Processes, and Practices

Build competence to ensure that complaints are consistently triaged

- The City should provide its internal investigations with regular investigation training

  - Such training should address complexities and subtleties that inhere in many experiences of ABR, and trauma-informed and anti-oppressive approaches

Policies, Procedures, Processes, and Practices

Review, revise, and rollout improved policies

- Address legal compliance issues with respect to the existing policies through a thorough legal review

- Revisions should seek to:

  - Increase process clarity;

  - Set out key expectations related to procedural fairness;

  - Set out roles and responsibilities of various relevant parties; and

  - Communicate workplace restoration as a possibility and likely expectation of any investigation process

Policies, Procedures, Processes, and Practices

Conduct clear and regular training on the policies, as well as on harassment and discrimination generally

- Consistently provide formal, thorough onboarding to new employees across all departments

- Provide effective, mandatory training to all staff, periodically refresh such training, and ensure that it meets *OHSA* requirements related to the workplace harassment policy and program

  - Ensure that staff are similarly trained with respect to discrimination and ABR

- Provide additional training to those responsible for addressing and investigating complaints

Questions