

## APPENDIX A



### **Equity, Diversity, and Inclusion Background, Policy, and Document Review: Town of Halton Hills**

Prepared by Aïda Cissé, Eva Bošnjak, Evelyn Amponsah, & Shayla Bird

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## Background Review

The history of First Nations Peoples in what is now colonially known as Halton Hills spans centuries before European contact in the 1600s. The Credit River was central to Indigenous life, supporting settlements, fisheries, horticulture, transportation, and trade. Iroquoian-speaking peoples, ancestors of the Wendat, occupied the Credit River Valley for centuries until the mid-1600s, establishing semi-permanent villages. The Wendat were displaced by the Haudenosaunee around 1649-50, amid the conflicts involving European colonial powers and their First Nations allies (Mississaugas of the Credit First Nation (MCFN), 2018)<sup>1</sup>.

The Mississaugas, part of the Anishinaabe Nation, arrived in southern Ontario in the 1690s. The group occupying the area between Toronto and Lake Erie, became known as the Mississaugas of the Credit. Until the early 19th century, they followed a seasonal cycle of movement and resource harvesting along the Credit River (Missinnihe, meaning “trusting creek”), and other rivers. In winter, extended family groups hunted in the Halton Hills area (MCFN, 2018<sup>1</sup>; Rowe, 2006<sup>2</sup>).

Increased Euro-colonial settlement diminished the Mississaugas' fisheries and traditional economies, leading to impoverishment and significant population decline (MCFN, 2018). In 1818, the British Crown negotiated Treaty 19, with the Mississaugas of the Credit, covering the land of present-day Halton Hills. This treaty is also known as the Ajetance Treaty (named after Chief Ajetance) (Cultural Heritage Master Plan, 2023)<sup>3</sup>.

European colonialists' endeavors in the region began in the 17th century with the onset of French and British fur trading. However, it wasn't until the late 18th century that significant European settlement was established. The Township of Esquesing was one of the earliest settlements in the area, while other townships, such as Nassagaweya and Trafalgar, emerged during the period as settlers staked claims and founded farms (Morrison & Young, 2022)<sup>4</sup>. Most of the early European settlers in Esquesing Township were Scottish and Irish (Palatine) farmers, primarily of Presbyterian or Methodist faith, and English

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<sup>1</sup> Mississaugas of the Credit First Nation. (2018). The Mississaugas of the Credit: Historical Territory, Resource and Land Use. <https://mncfn.ca/wp-content/uploads/2018/08/The-Mississaugas-of-the-Credit-Historical-Territory-Resource-and-Land-Use.pdf>

<sup>2</sup> Rowe, J. M. (2006). *Georgetown: Reflections of a small town*. Esquesing Historical Society.

<sup>3</sup> Cultural Heritage Master Plan. (2023). *Halton Hills Cultural Heritage Strategy: Planning for Heritage in an Evolving Landscape*. Town of Halton Hills.

<sup>4</sup> Morrison, K. I., & Young, J. (2022, June 2). *Halton Hills*. The Canadian Encyclopedia, Historica Canada. <https://www.thecanadianencyclopedia.ca/en/article/halton-hills#:~:text=Halton%20Hills%20is%20located%20approximately,Acton%2C%20Georgetown%20and%20Esquesing%20Township.>

retired military or tradespeople (Carter, 2006)<sup>5</sup>. The mid-19th century saw the construction of the railway, which played a vital role in the growth and development of Halton Hills. The railway provided a means of transportation for goods and people, spurring commerce which in turn resulted in increased settlement and the emergence of new towns and villages along its route. In 1974, the towns of Georgetown and Acton, and proximate rural areas, were amalgamated to form the Town of Halton Hills. This consolidation aimed to streamline governance and services while fostering a sense of unity among the various communities within the region (Town of Halton Hills, n.d.)<sup>6</sup>.

Since its formation, Halton Hills has experienced steady growth and development. As of 2021, the population of the area was 62,951; a 2.9% increase since 2016 (Statistics Canada, 2021a). Most occupied dwellings in the Town are single-family detached houses. With recent significant increases in the cost of living, it is important to highlight that 40.2% of renters and 14.8% of homeowners are spending more than 30% of their gross income on housing (25% sample data) (Statistics Canada, 2021). Alongside spending on housing, low-income measures are also important to highlight. The 2021 Statistics Canada census of population shows that 3.9% of children, 4.4% of adults (between the ages of 18 and 64), and 8% of older adults (over the age of 65) are categorized as low-income. The group with the greatest percentage of individuals falling under the low-income measure is adults over the age of 65. Many adults over the age of 65 are retired, meaning that many are likely to be living on a fixed income. As the cost of living, including housing continues to increase, financial insecurity among this group may increase.

The demographics of the Town are also changing. Namely, the population is diverse in terms of age, language, ethnicity, and religion. There have also been steady increases in the immigrant population from 2016 to 2021, with 11,840 residents being immigrants, an increase of 21.5%. In addition to changing demographics as a result of immigration, the population of racialized individuals in the Town has also increased. As of 2021, 8,450 (25% sample data) residents are racialized, with South Asian, Chinese, and Black populations being the most notable (Statistics Canada, 2021a). These data show that Halton Hills is becoming an increasingly diverse and multicultural community. For the Town, this means that there is an opportunity to integrate EDI into governance, policy, services, and programming that serves diverse community needs. It will also be important for the Town to consider how it will embed EDI into decision-making, HR practices, policies, and procedures to better prepare itself to manage the complexities of a growing population.

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<sup>5</sup> Carter, J. B. (2006). *Norval history, 1820-1950*.

<sup>6</sup> Town of Halton Hills. (n.d.). *Invest Halton Hills*. <https://www.investhaltonhills.com/en/index.aspx>

## Demographics

### Overall

- Population 2021: 62,951
- 2.9% increase since 2016

### Age

- 0-14: 17.0%
- 15-64: 67.9%
- 65+: 15.1%
  - 1.9% are over 85

### Households

- 21,825 occupied dwellings
  - Majority type of dwelling is single-detached houses
- Average household size is 2.9; median household size is 3
- Average number of children per census family: 1.8

### Dwellings

- Own/Rent
  - 18,610 Own
  - 3,200 Rent
- 21,745 households spend more than 30% of their income on housing
  - 14.8% of owner households spend more than 30% of their income on housing
  - 40.2% of renter households spend more than 30% of their income on housing
  - Median \$ spent on rent: \$1,320
  - Average \$ spent on rent: \$1,468

### Income

- Median individual income: \$49,720
- Median household income: \$127,000
- Median income of “economic family”: \$144,000
- Household income
  - \$0-\$19,999: 605
  - \$20,000-29,999: 945
  - \$30,000-\$39,999: 945
  - \$40,000-\$49,999: 1,180
  - \$50,000-\$59,999: 1,145
  - \$60,000-\$69,999: 1,225
  - \$70,000-\$79,999: 1,330
  - \$80,000-\$89,999: 1,335
  - \$90,000-\$99,999: 1,310
  - \$100,000-\$124,999: 14,910
  - \$125,000-\$149,999: 2,620

- \$150,000+: 6,075
- Low-income measure:
  - 520; 3.9% children
  - 1,735; 4.4% between ages of 18 and 64
  - 725; 8% over 65

### Languages

- English only: 57,465
- English and French: 4,795
- French only: 15
- Neither French nor English: 460
- Most common non-official languages spoken:
  - Indo-European languages

### Indigenous

- 1,145 people identify as Indigenous
- 300 Registered/Treaty Indian

### Citizenship

- 2,395 people are not Canadian citizens
- 11,840 residents are immigrants
  - 2011 to 2021: 1,700

### Racialized Groups

- 8,450 (13.6%) people identify as racialized. Note that the Government of Canada uses the term “visible minorities” to refer to racialized individuals and groups; however, “racialized persons” or “racialized groups” is preferred terminology as it acknowledges that race is a socially constructed concept that is imposed upon people. When referring to an individual or particular racialized group, use the most specific term, rather than a broad term, such as “racialized.”
  - The number of residents who identified as racialized in 2021 is almost double the 7.4% identified in the 2016 Census.
  - The largest racialized population is South Asian, representing over 40% of the racialized population and 5.6% of the total population. Next largest racialized populations are Black, Chinese, Filipino, Latin American & Arab.

### Education

- 2,700 people age 25 and older do not have a high school diploma
- 15,765 people have a post-secondary certification below a Bachelor’s
  - 2,910 of which are trade apprenticeships
- 13,590 have a Bachelor’s degree or higher

### Work

- Employed Labour force 15 years and older: 32,630

### Transportation to work commutes – 25 % sample

- Type

- Vehicle: 21,250
  - Transit: 310
  - Walking/Wheeling: 770
  - Bike: 70
  - Other: 475
- Duration
  - 15 minutes or less: 6,245
  - 15-29 minutes: 5,640
  - 30-44 minutes: 6,000
  - 45-59 minutes: 2,855
  - 60 minutes or more: 2,130

## Analysis of Demographic Information

### Population

- The population of the area in 2021 was 62,951, showing a 2.9% increase since 2016.
- The distribution by age groups indicates a relatively balanced population with 17.0% aged 0-14, 67.9% aged 15-64, and 15.1% aged 65 and over. Additionally, 1.9% of the population is over 85.

### Households

- There are 21,825 occupied dwellings, with the majority being single-detached houses.
- The average household size is 2.9, with a median household size of 3.
- In terms of ownership, 18,610 households own their dwellings, while 3,200 rent.
- A significant portion of households (21,745) spend more than 30% of their income on housing, with a higher percentage among renters (40.2%) compared to owners (14.8%).
- The median rent is \$1,320, and the average rent is \$1,468.

### Income

- The median individual income in the Town is \$49,720, while the median income of an "economic family" is \$144,000.
- Household income distribution shows varying levels, with the majority falling within the \$100,000-\$149,999 range (around 14,910 households).

### Low-Income Measure

- There are 520 children (3.9%), 1,735 individuals between the ages of 18 and 64 (4.4%), and 725 individuals over 65 (8%) categorized under the low-income measure.
  - The data provides insights into the demographic composition, housing characteristics, and income distribution within the area. It indicates a diverse population with varying housing needs and income levels, highlighting potential areas for policy intervention or community support to address housing affordability and income inequality issues.
- English is the dominant language, spoken by 57,465 individuals, with 4,795 individuals speaking both English and French.
- Only 15 individuals speak French only, and 460 individuals do not speak either English or French.

### Indigenous Population

- 1,145 people identify as Indigenous, with 300 being Registered/Treaty Indian.

### Immigrant Residents

- Citizenship data shows that 2,395 residents are not Canadian citizens, and 11,840 residents are immigrants. There was an increase of 1,700 immigrants from 2011 to 2021.
- Immigrants come from various countries, with significant numbers from the Americas (particularly the United States and various South American countries), Europe (including the United Kingdom, Poland, and Portugal), Asia (including India, China, and the Philippines), and Africa (including Egypt, Nigeria, and South Africa).

### Race

- The total racialized population is 8,450, with South Asian, Chinese, and Black populations being notable.
- The majority of the population, 53,880 individuals, are white.

### Religion

- Christianity is the dominant religion, with various denominations represented such as Catholic, Anglican, United Church, and Presbyterian.
- Other religions represented include Hinduism, Islam, Sikhism, Buddhism, Judaism, and traditional Indigenous spirituality.
- A significant portion of the population (20,050 individuals) identify with no religion or secular perspectives.

The data portray a diverse population in terms of age, language, ethnicity, and religion. It reflects the multicultural and multilingual nature of the Town of Halton Hills, with a significant immigrant population steadily contributing to the diversity. The Town's increasing multicultural presence provides an invitation to consider how the Town pursues EDI in governance, as policy and programming can be implemented to accommodate diverse communal needs. Additionally, in practicing EDI, there is a responsibility to honor Indigenous cultures, histories and presence by engaging local indigenous communities in consultation, decision making and reconciliation-based activities.

### Education

- 2,700 people aged 25 and older do not have a high school diploma, indicating a portion of the population with limited formal education.
- 15,765 people have a post-secondary certification below a Bachelor's degree, with 2,910 of them being trade apprenticeships. This suggests a significant number of individuals pursuing vocational training or technical education.
- 13,590 people have a Bachelor's degree or higher, indicating a substantial portion of the population with tertiary education qualifications.

The data suggests a mixed educational landscape within the community, with varying levels of educational attainment. Additionally, the workforce is diverse, with a range of educational backgrounds and employment statuses.

### Work

- The employed labor force aged 15 years and older is 32,630.
- Transportation to work commutes data (25% sample) shows that the majority (21,250) commute to work using a vehicle, indicating a reliance on personal transportation.
- A smaller portion utilizes transit (310), walks or wheels (770), bikes (70), or uses other means (475) for commuting.
- The duration of commutes varies, with significant portions falling within the 15-29 minutes (5,640) and 30-44 minutes (6,000) categories, followed by 15 minutes or less (6,245). However, a notable number also have longer commutes of 45-59 minutes (2,855) or 60 minutes or more (2,130).

The transportation data highlights the high reliance on personal vehicles for commuting, although alternative modes of transportation are also utilized by a smaller portion of the population. The distribution of commute durations indicates a range of commuting experiences, with a significant portion falling within the moderate range of 15-44 minutes.

Statistics Canada. (2021). *Census profile: 2021 census of population*. <https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=halton%20hills&DGUIDlist=2021A00053524015&GENDERlist=1&STATISTIClist=1&HEADERlist=0>

*\*Further demographic information can be found through Statistics Canada.*

## Policy and Document Review

### Background and Purpose

In an equity, diversity, and inclusion (EDI) context, the majority of organizational policies and practices have focused on “access” or “opening the doors” instead of attempting to address the structural causes of exclusion that stem from the interrelated factors related to settler colonialism, racism, sexism, ableism, and capitalism (Frisby & Ponc, 2013; Paraschak, 2013). This simplistic approach to inclusion focuses entirely on increasing the representation of certain groups. Further, this approach assumes that certain groups are not represented because of personal deficits, rather than exclusionary systems. The result of this approach leaves the exclusionary mechanisms embedded in such policies and practices largely under examined (Haudenhuyse, 2017).

It is important to recognize that the development of equitable, diverse, and inclusive organizations will require a number of fundamental changes to the hierarchical power relations, such as reallocating resources and determining who has decision-making authority. The purpose of this review is to provide a theoretically grounded snapshot of the Town of Halton Hills’ (the “Town”) policies and procedures and provide some insights that might aid in the development of the Town’s EDI action plan.

Document reviews offer an important first lens into how organizations interact with people within their ecosystems. Historically, documents such as policies and procedures, as well as hiring practices have helped to maintain the status quo within workplaces, limiting the possibility for implementing equitable systems, and achieving diverse representation, inclusion, and belonging.

### Process

All documents were provided to INclusion INCorporated in December 2023. Documents were reviewed by an initial reviewer and then reviewed by other individuals who have different work, education, and lived experiences. Consistent themes and strategies to improve are listed at the end of this document. Only the documents that had feedback are included in the tables below.

## Policies and Documents Reviewed

- Disconnecting from Work
- Disconnecting from Work (FAQs)
- Work from Home Procedure
- HR Business Partner (Job Posting Sample)
- Personnel Policy Manual
- Council Strategic Plan
- Summary of Community Feedback on Draft Strategic Plan 2023-2026
- Procedure By-law
- Customer Service Policy
- Purchasing Policy
- Public Conduct Policy
- Public Engagement Charter
- Inclusion Policy (Recreation)
- Youth Engagement Policy
- Affordability Policy Framework
- 2021 Specialized Transit Plan
- Business, Environment, and Culture: 2023 Budget and Business Plan

## Disconnecting From Work

Current Wording	Recommended Wording/Approach	Reasoning	Opportunities to Expand the Policy or Area
<p>Disconnecting from work means to not engage in work-related communications, including emails, telephone calls, video calls or the sending or reviewing of other messages, so as to be free from the performance of work.</p>	<p>We recommend expanding the definition of "Disconnecting from work" to include specific examples of work-related communication that employees should avoid outside their normal working hours. For instance, it should explicitly mention avoiding the expectation of immediate response to emails or calls after hours to provide clearer guidance.</p>	<p>Providing specific examples of work-related communication will help employees better understand what is expected when disconnecting from work. This clarity may contribute to a healthier work-life balance and reduce the pressure to be constantly available.</p>	<p>The policy could include examples of the challenges faced by employees in maintaining work-life boundaries in a remote or hybrid work environment. Additionally, it could highlight the benefits of a clear disconnecting-from-work policy in promoting employee well-being.</p>
<p>An employee's normal working hours are as set out in their employment contract and/or the Town's Personnel Policy Manual or applicable collective agreement.</p>	<p>We recommend adding that employees should be given a standard notice period (this period should be standard across the corporation) of any changes to their normal working hours, respecting their need for stability in their work schedules. This policy should clearly state how much notice (e.g., one week) employees will receive if their</p>	<p>Including the requirement for reasonable notice of changes in working hours promotes fairness and stability for employees. Sudden changes can disrupt personal lives and make it challenging to maintain a healthy work-life balance.</p>	<p>The policy could further address how changes in working hours should be communicated and negotiated, ensuring employee input and consent when possible. Requests for accommodation may impact an employee's working hours. Consider stating this as a caveat.</p>

	working hours differ, even for one day.		
Reporting Concerns: All employees are expected and required to report any concerns or issues they may have which they feel is impacting their ability to disconnect-from-work.	Emphasize that employees will not face any negative consequences or reprisals for reporting concerns about their ability to disconnect from work, reinforcing a culture of open communication.	<p>Many employees need to experience some sense of psychological safety in order to feel comfortable reporting concerns without fear of retaliation. This is essential for maintaining a healthy work environment.</p> <p>In situations where power imbalances exist (e.g., between an employee and their supervisor; between an Indigenous employee and a white employee), employees may not feel comfortable openly communicating their thoughts and opinions.</p>	The policy could include a clear process and mechanisms for reporting concerns. Additionally, one of the reporting mechanisms should be anonymous.

## Disconnecting From Work (FAQs)

Current Wording	Recommended Wording/Approach	Reasoning	Opportunities to Expand the Policy or Area
<p>Not all employees of the Town work standard hours of 8:30 a.m. - 4:30 p.m., Monday to Friday. When sending a message outside of you and your teams regular working hours, be clear if any action can wait until the next working day.</p>	<p>Employees who are sent emails outside of their working hours should not be expected to respond until the next working day.</p>	<p>The current wording suggests that employees would need to monitor their email outside of working hours to check for urgent actions. This wording creates the opportunity for supervisors and managers to send urgent emails to their direct reports, telling them they need to work outside of regular working hours. This does not align with the new disconnecting from work legislation.</p>	
<b>General Comments &amp; Recommendations</b>			
<p>The FAQ could benefit from additional questions and answers to provide greater clarity to employees. These may explore the following themes:</p> <ul style="list-style-type: none"> <li>• Provide practical tips and strategies for employees to disconnect effectively, such as setting boundaries, using out-of-office notifications, and prioritizing self-care.</li> <li>• Clarify if there are specific situations where employees may need to remain accessible outside of regular hours due to job requirements and explain how these cases will be handled.</li> <li>• Outline the mechanisms for evaluating the policy's effectiveness, gathering feedback from employees, and adjusting as needed to ensure its success.</li> <li>• Provide information about available employee assistance programs, resources, or support networks that can help employees manage their well-being and work-life balance effectively.</li> </ul>			

## Work from Home Procedure

Current Wording	Recommended Wording/Approach	Reasoning	Opportunities to Expand the Policy or Area
<p>The Town of Halton Hills recognizes that working from home can have benefits for both the employee and the Town. The purpose of this Work from Home policy is to facilitate employees to work from home while ensuring that operational requirements are met in a safe, secure and timely manner.</p>	<p>We recommend expanding the introduction to include statements acknowledging how working from home can be beneficial for different equity denied groups.</p>	<p>Acknowledging harms and inequities is an important first step in deconstructing systemic inequities.</p> <p>For example, working from home can help to minimize some of the negative physical, mental, and emotional effects of microaggressions that some employees from equity denied groups experience in the workplace. Working from home can also create greater access to employment for some people experiencing disability.</p>	<p>Consider linking to an accommodations policy to support work-from-home arrangements as one way of accommodating employees.</p> <p>The policy could provide guidance on how employees can request accommodations and the process for assessing and implementing these accommodations when working from home.</p>
<p>EQUIPMENT AND OFFICE SUPPLIES: The employee should take steps to ensure their ability to remotely access the required electronic system/information.</p>	<p>What steps do employees need to take to be able to remotely access the required electronic system/information? Is certain software required? If so, it should be the Town’s responsibility to provide employees with the required technology, equipment, or software.</p>		<p>The policy could include information on how employees can request specific assistive technology or accommodations related to their home workspace. Alternatively, include this information in an accommodations policy and link directly to it.</p> <p>Consider adding a section that explicitly acknowledges the Town's responsibility to</p>

			provide accessible technology and equipment for employees with disabilities who require assistive devices or software to effectively work from home.
HEALTH AND SAFETY, ERGONOMICS: The employee shall confirm with the Town that the Alternative Worksite is free from workplace hazards and is ergonomically suitable.	Ensure that the criteria are made available to employees.	Are employees made aware of the criteria they must meet?	
<b>General Comments &amp; Recommendations</b>			
The Work from Home procedure does not fully integrate accessibility considerations. To address this, it is essential to incorporate accessibility considerations to ensure that all employees can participate in remote work arrangements. Please refer to the “Themes and Strategies to Improve the Town’s Policy Library” section at the end of the document.			

#### Human Resources Business Partner (Job Posting Sample)

<b>General Comments &amp; Recommendations</b>
<p>Consider the following:</p> <ul style="list-style-type: none"> <li>• <b>Specific Details on Key Responsibilities:</b> While the posting lists general accountabilities, it could be enhanced by providing more specific details about the day-to-day responsibilities of the role. This would help candidates get a clearer picture of what to expect in the position.</li> <li>• <b>Information on the Interview Process:</b> Providing details about the stages of the interview process and what candidates can expect can help manage their expectations and better prepare them for the selection process.</li> <li>• <b>Application Deadline:</b> The posting mentions a deadline but does not specify the time zone which can unintentionally pose a barrier to candidates outside of said zone. Adding the time zone (e.g., Eastern Standard Time) can help candidates submit their applications on time.</li> <li>• <b>Considering how EDI fits in the role:</b> The role of the Human Resources Business Partner must prioritize EDI as an integral part of its strategic responsibilities. HR practices are traditionally extractive and work to protect the organization, rather than employees. The job posting should reflect that the candidate must have an understanding of (and ideally experience in advancing) equity and systemic oppression. EDI should not be an afterthought but woven into an organization's fabric, policies, procedures, and job positions.</li> </ul>

Personnel Policy Manual (with consideration of the document entitled “APPENDIX A - 2023 Personnel Policy Manual - with tracked changes for Council Report Dec 2023.”)

Current Wording	Recommended Wording/Approach	Reasoning	Opportunities to Expand the Policy or Area
<p><b>Section 6 – Hours of Work, Overtime Hours, and Standby</b></p> <p>b) Overtime entitlement for each full-time position is specified in the non-union position grid kept by Human Resources.</p> <p>f) Employees will receive reasonable advance notice of a change in hours of work.</p>	<p>Link directly to the mentioned pay grid.</p> <p>We recommend including provisions for flexible work arrangements to accommodate employees with diverse needs, such as those experiencing disability or who have caregiving responsibilities. Managers and supervisors should be required to check-in with employees regarding changes in working hours to consider the potential impacts on their personal lives.</p>	<p>While not necessary to include directly in this policy, it is important to consider each employee’s workload so that they are not required to consistently work overtime, which can lead to burnout.</p> <p>Changing working hours can have a negative impact on some employees, including those who are caregivers. It is important to consider the impact that these changes may have on the lives of employees. For example, if the working hours for an employee who has children are adjusted and they end work a few hours later than they typically would, they may have to begin paying for childcare, which could potentially have negative financial impacts.</p>	<p>Consider adding details on the process for requesting and approving flexible work arrangements, with an emphasis on accessibility considerations. Link directly to an accommodations policy.</p>
<p><b>Section 6 – Hours of Work, Overtime Hours, and Standby</b></p> <p>Overtime</p>	<p>Develop and/or link to a process for obtaining pre-approval for overtime.</p>	<p>What is the process for requesting approval for overtime? The lack of clarity regarding this process places the</p>	

<p>b) All overtime must be pre-approved.</p>		<p>responsibility on employees to seek out this information themselves.</p>	
<p><b>Section 7 – Employee Benefits</b></p> <p>a) Each employee shall join the Ontario Municipal Employees Retirement System Basic Pension Plan upon <b>his or her</b> hire date.</p>	<p>Replace <b>his or her</b> with <b>their</b>.</p>	<p>The pronouns used in this section are binary and do not recognize that many people identify outside the gender binary. Gendered language that is used to refer to a group of people whose genders are unknown can signal to non-binary and gender diverse employees that they are not welcome at the Town.</p>	
<p><b>Section 7 – Employee Benefits</b></p> <p>a) Full-time employees are eligible for the benefits described in this section.</p>	<p>Explore the Town’s current benefits package to determine whether part-time (both permanent and contract) employees can be provided with benefits.</p>	<p>Only providing benefits to full-time employees could create health and financial inequities for some employees, particularly those experiencing disability. As one example, mental health care is not covered provincially and can be a significant ongoing expense if employees must pay out of pocket. As another example, many medical supplies (e.g., ostomy products, catheters) are not consistently covered by provincial health insurance. These</p>	

		are medically necessary supplies that some individuals need. Without benefits coverage, individuals will be forced to pay out of pocket for these supplies, causing financial disparities.	
<b>Section 8 – Designated Holidays and Vacation</b>			Consider allowing employees to substitute a public/stat holiday for another day that holds religious, spiritual, or cultural significance to them. Giving employees the option to substitute stat holidays for other non-Christian or Euro-Canadian days that they observe is considered to be a substantive method for fostering an inclusive workplace.
<b>Section 10 - Convention, Conference, Employment Expenses, and Professional Fees</b>  The policy covers the payment of annual membership fees for professional organizations, distinguishing between necessary memberships and those contributing to professional growth and development. It mentions	We recommend explicitly stating the types of opportunities and membership fees that will be covered by the Town.	What professional memberships are considered to be necessary?  The criteria for determining the types of membership fees that the Town will cover is unclear. There is the potential for decision making around determining the types of memberships that will	Consider expanding the policy to include guidelines for evaluating and approving professional development opportunities, integrating equity and inclusion principles.

<p>the approval process within the department budget.</p>		<p>contribute to professional growth and development. The types that are deemed necessary will likely be reflective of the status quo (e.g., masculine-coded disciplines and professions are deemed to be more important).</p> <p>Developing criteria for determining the types of memberships that will be covered will help to reduce biased decision making.</p>	
<p><b>Section 12 – Employee/Employer Relations</b></p> <p>Entire section.</p>	<p>We recommend providing more details about the employee complaint procedure, including steps, timelines, and how complaints will be addressed.</p>	<p>Providing a more comprehensive overview of the employee complaint procedure will ensure that employees understand their rights and the steps they should follow in case of a complaint. Additional procedural details will also help to hold the Town accountable for addressing complaints.</p>	
<p><b>Schedule A – Code of Conduct</b></p> <p>Staff are to contribute to a positive, safe and healthy workplace that results in the preservation of <b>equality</b> and creates an environment that supports an individual’s</p>	<p>We recommend revising focusing on <b>equity over equality</b>.</p>	<p>Equality is not sufficient as it ignores individual needs and differences. Equity is the process of analyzing and addressing unfair systems and practices towards the creation of equal outcomes. It refers to fair treatment</p>	<p>Consider the ways that EDI principles could be integrated throughout the code of conduct. We recommend creating categories of employees (e.g., managers, supervisors, administrative staff, etc.) within the code and outlining the types</p>

<p>physical, emotional and social well-being.</p>		<p>of everyone and addresses specific needs, barriers, and accommodations to ensure all have equal access and opportunity. Equity creates fair outcomes; equality does not.</p>	<p>of behaviours and actions the Town wants each group to model. The current code takes a deficit-based approach. Rather, focus on the ways employees can take action to create a more equitable and inclusive workplace.</p>
<p><b>Schedule B – Workplace Discrimination Prevention</b></p> <p><b>Schedule C - Workplace Violence and Harassment Prevention</b></p>	<p>Integrate timelines into both investigations processes so that the Town (as a corporation) can be held accountable.</p> <p>We recommend always having more than one individual conduct an investigation. We recommend that the Town prioritizes the selection of investigators who have a knowledge of systems of oppression, and who are trained in trauma informed and culturally competent approaches.</p>	<p>Both schedules do not have timelines associated with the investigations processes. A lack of timelines makes it difficult for employees to hold the Town accountable for investigating a complaint within an acceptable timeline. Investigations should not be drawn out for prolonged periods of time.</p> <p>Individuals who have not experienced harm or oppression are less likely to recognize the insidious nature of misconduct that is rooted in ableism, racism, transphobia, sexism, xenophobia, etc. Individuals who are responsible for conducting these investigations should have knowledge of systemic inequities and</p>	

		how they impact people.	
<b>Schedule C – Workplace Violence and Harassment Prevention</b>  Definitions.  Entire section.	We recommend maintaining the clarity and comprehensiveness of these definitions while periodically reviewing them to ensure they remain up-to-date and aligned with legal standards.	Regularly reviewing and updating definitions is crucial to keeping the policy in compliance with legal requirements and ensuring that it reflects evolving understandings of these terms.	
<b>Schedule C – Workplace Violence and Harassment Prevention</b>  Incidents must be filed as soon as practically possible after the incident occurred using the Workplace Violence Report detailing the nature of the incident, dates, times, places, witnesses and names of those involved. The report may be completed by the Supervisor, employee or witness.	We recommend revising this statement to acknowledge the complexity of individuals' experiences when reporting incidents. Encourage reporting while being sensitive to the fact that the experience of violence can be emotionally challenging and may not always permit immediate reporting. Ensure the language throughout the policy reflects empathy and understanding towards those who may need more time to report.	Acknowledging the emotional complexity of reporting incidents of violence or harassment is essential. Harm can take time to process. It may take some individuals longer than others to identify that they have experienced harm and to process that experience. Placing a vague timeline on reporting a complaint suppresses individual agency. Individuals should have agency over how and when they share their experiences of harm.  Placing a timeframe on reporting an incident may discourage some individuals from coming forward.	Consider incorporating a section within the policy that emphasizes the Town's commitment to providing emotional support and resources for individuals who have experienced workplace violence or harassment. This can include information on counseling services, employee assistance programs, or external support networks.
<b>Schedule C – Workplace Violence and Harassment Prevention</b>	We recommend adding a statement around the resources	The policy primarily focuses on logistics regarding violence and	

<p>General provisions. Entire section.</p>	<p>and supports the Town will provide to people who have experienced workplace violence and harassment. A “database” (e.g., a webpage) could be used to house these resources so that they can be easily accessed by employees.</p>	<p>harassment in the workplace, with little consideration given to how individuals may be impacted.</p>	
<p><b>Schedule C – Workplace Violence and Harassment Prevention</b>  Responsibilities Entire section</p>	<p>We recommend adding wording for all parties mentioned in this section to affirm a responsibility to actively promote a culture of respect, inclusion, and empathy within the workspace.</p>	<p>Integrating EDI principles into employee responsibilities is key to reinforcing the commitment to these elements in the workspace.</p>	
<p><b>Schedule D – Job Evaluation Policy</b>  The purpose of the Job Evaluation Policy is to establish an appropriate point range for each position, which then relates to the grades on the Town's Salary Grid.</p>	<p>We recommend including that the purpose of the policy is not just to establish point ranges but also to ensure fairness, transparency, and equity in compensation across positions.</p>		
<p><b>Schedule D – Job Evaluation Policy</b>  The Chief Administrative Officer will seek Council's approval for reorganizations affecting staff at the Department Heads' level.</p>	<p>Review the role of Council.  Consider how employees at different levels can participate in or have input into decisions that will have an</p>	<p>Why is Council approval required for decisions solely affecting staff?  Is internal consultation done when considering reorganizations? The current approval</p>	<p>Consider providing guidelines for assessing and mitigating potential negative impacts of reorganizations on employees.</p>

	impact on them. This will support trust-building across the organization.	process is top-down, which is reflective of colonial processes.	
<b>Schedule D – Job Evaluation Policy</b>  Reclassification When the Department Head has determined that the content of an existing position has substantially changed, they will submit a revised, signed job description to the Director of Human Resources.			A more robust job reclassification policy must be developed. There are currently no stated criteria for reclassification. Job reclassification must also consider the Town’s current salary grid.
<b>Schedule D – Job Evaluation Policy</b>  Roles and Responsibilities A designated Human Resources staff will administer, track and communicate results of any job evaluations.	To increase accountability and transparency, more specifics need to be included.	The language used in this statement is broad and vague. What methods does HR use to track and communicate the result of job evaluations?	Provide guidance on how HR can support employees throughout the job evaluation process.
<b>Schedule D – Job Evaluation Policy</b>  Upon request, an employee will have access to the job evaluation information contained in the Rating Rationale pertaining to their own position.	Specify the process for requesting access to job evaluation information. Include information on the format and channels through which employees can request and receive job evaluation information.	The process for accessing job evaluation information is unclear.	
<b>Schedule E – Adjusted Work Arrangements</b>  Employees must work with their supervisors to	We recommend revising this policy to emphasize the importance of collaboration and	Adjusted work arrangements, including a flexible work schedule can be beneficial to, for	Provide guidance on how to address conflicts in workday schedules.

<p>establish individual and departmental schedules.</p>	<p>flexibility in establishing workday schedules.</p> <p>Consider designating an individual from HR to support with this process.</p> <p>Create a process for employees to formally request adjusted work arrangements.</p>	<p>example, neurodivergent employees, employees who have other types of disabilities, and employees who are caregivers.</p> <p>Adjusted work arrangements can also be a form of accommodation.</p> <p>This statement places the decision making on each supervisor, which may result in biased decisions being made about who is granted adjusted work adjustments.</p> <p>The current process does not acknowledge workplace power dynamics and assumes that employees will be comfortable approaching their supervisor about adjusted work arrangement. This may be particularly difficult for employees from equity denied groups who also have to navigate identity-based power differentials.</p>	
<p><b>Schedule J – Guidelines for Use of social media &amp; Digital Communications</b></p> <p>Entire section.</p>	<p>The guidelines provided herein can benefit from the integration of EDI considerations. For</p>	<p>Embedding EDI principles into social media practices aligns with the commitment to fostering an</p>	

	example, provide staff with examples of inclusive language they should use.	inclusive and equitable online environment.	
<b>General Comments &amp; Recommendations</b>			
<p>The policy document can benefit from the following general comments and recommendations:</p> <ol style="list-style-type: none"> <li><b>Incorporate EDI:</b> Several sections of the policy document could benefit from integrating EDI considerations. Ensure that policies and guidelines actively promote a culture of respect, inclusion, and empathy. Encourage transparency and equitable access to resources, especially for equity denied groups.</li> <li><b>Clear, Transparent, and Comprehensive Procedures:</b> Many sections could benefit from providing clearer and more comprehensive procedures. This includes detailing steps, timelines, and addressing potential conflicts or challenges. Clear procedures ensure that employees understand their rights and how to navigate various situations. Consider developing numbered step-by-step procedures, which may be supportive for some employees who are neurodivergent.</li> <li><b>Flexibility and Employee Well-being:</b> Emphasize flexibility and consider the impact of policies on employee well-being. Policies should accommodate diverse needs, including those related to disability, caregiving responsibilities, and other health-related needs. Consider the emotional complexity of reporting incidents and provide support and resources for individuals who experience workplace violence or harassment.</li> </ol>			

Council Strategic Plan – Appendix A and Potential initiatives to support the Strategic Plan implementation – Appendix C

<b>General Comments &amp; Recommendations</b>	
<ul style="list-style-type: none"> <li>The plan can greatly benefit from a comprehensive integration of EDI principles throughout. While the plan does mention its commitment to creating safe and inclusive communities, it's imperative to recognize that this commitment should extend as a foundational lens across all aspects of the plan, including its vision, mission, values, priorities, objectives, and potential initiatives.</li> <li>The plan should explicitly state the vital role of EDI in cultivating a thriving economy, ensuring resilient infrastructure and asset management, preserving natural areas and heritage, and promoting safe and welcoming communities. This acknowledgment should be interwoven into the plan's vision, mission, and values, emphasizing the significance of embracing diversity within the community as a driving force for all strategic priorities.</li> <li>To bridge this gap, the plan can consider establishing clear targets for diverse representation in leadership roles, implementing comprehensive anti-discrimination policies, and actively promoting cultural awareness initiatives within each priority area. These measures are not only essential to create a truly inclusive environment but also to align with the Town's overarching vision for Halton Hills.</li> </ul>	

- The plan should address the issue of equitable access to economic benefits and opportunities, especially for marginalized groups, across all aspects of its priorities. While it highlights economic development and growth initiatives, it needs to specify measures to address disparities in economic outcomes. These measures may include targeted workforce development programs, affordable housing initiatives, and opportunities, resources, and supports for entrepreneurs from equity denied communities.
- In terms of cultural and heritage preservation, the plan should explicitly state its commitment to preserving Indigenous histories and the histories of other equity denied groups within the community as an essential element of natural areas and heritage conservation. It should recognize and celebrate the cultural diversity of Halton Hills by supporting initiatives that showcase the heritage of various equity denied groups.
- Inclusivity in engagement processes is vital not only in the context of safe and inclusive communities but also across all strategic areas. While the plan highlights engagement through surveys, focus groups, and interviews, it must ensure the representation of marginalized voices throughout its implementation. Active engagement with equity denied groups, provision of materials in multiple languages and accessible formats, and data disaggregation to address disparities in service satisfaction among different demographic groups should be incorporated into the planning and execution of all initiatives. Additionally, consider developing a community engagement process that specifically addresses how different equity denied groups will be engaged with.

### Summary of Community Feedback on Draft Strategic Plan 2023-2026

#### General Comments & Recommendations

The Summary of Community Feedback on the Draft Strategic Plan 2023-2026 presents valuable insights and recommendations for the Town of Halton Hills. The engagement process, which utilized a four-point Likert scale and a combination of online and telephone surveys, reflects a commendable effort to gather public opinions effectively. However, to further enhance the strategic plan's effectiveness and alignment with the community's aspirations, several key considerations and recommendations arise:

- **Inclusion of EDI Principles:** While the plan mentions its commitment to safe and welcoming communities, it should weave an EDI lens throughout all aspects, including its vision, mission, values, priorities, objectives, and potential initiatives. This approach will ensure that the plan reflects the diverse needs and perspectives of residents.
- **Communication Channels:** The online survey indicated that the top three preferred methods for communicating with the Town were the website, telephone, and social media. To enhance community engagement, the Town should ensure these channels are accessible to all residents, including those with diverse language needs and disabilities.
- **Climate Action Integration:** The previously examined strategic plan includes objectives related to climate awareness and action, such as protecting biodiversity and ensuring resilient infrastructure. To strengthen these efforts, the Town should integrate specific climate action strategies and initiatives, such as renewable energy programs, carbon reduction targets, and

climate adaptation measures, into its priorities and objectives. Sustainability ties closely with EDI efforts and as such, both elements should be worked and woven into the strategy.

- **Affordable Housing:** Housing availability and affordability are critical concerns. The plan should emphasize, and update objectives related to advancing residential intensification where planned, along with initiatives to address housing issues, such as affordable and accessible housing programs and partnerships with organizations specializing in housing solutions.
- **Transparency and Accountability:** The plan should maintain transparency in the approval process for initiatives and associated actions, ensuring that community members are well-informed about decision-making. Additionally, it should establish a clear mechanism for ongoing monitoring, reporting, and updates to actions, aligning with the multi-year nature of the plan.

### Procedure By-Law

Current Wording	Recommended Wording/Approach	Reasoning	Opportunities to Expand the Policy or Area
<p><b>Application &amp; principles</b></p> <p>Unless a contrary intention appears, in this by-law, words in the singular include the plural and words importing masculine gender include the feminine.</p>	<p>We recommend expanding this section to acknowledge and incorporate inclusive language principles throughout the by-law. Encourage the use of gender-neutral language and consider including a statement promoting diversity and inclusivity in all written and verbal communication related to Council and Committee proceedings.</p>	<p>This recommendation aligns with EDI principles by promoting gender inclusivity and acknowledging the importance of inclusive language. It ensures that all individuals, regardless of their gender identity, feel respected and included in the governance process.</p>	<p>Consider providing guidelines or resources on the use of gender-neutral and inclusive language. Encourage awareness and education on the importance of using language that respects diverse gender identities and backgrounds.</p>
<p><b>Application &amp; principles</b></p> <p>"That Members of Council will endeavor to contact report authors</p>	<p>We recommend expanding this section to explicitly state that Members of Council should</p>	<p>This recommendation promotes accessibility and inclusion by highlighting the importance of</p>	<p>Consider providing specific guidance on accessible communication methods and formats.</p>

<p>(staff) through written correspondence, prior to the respective meeting where a report is listed on the agenda, should the Member need to seek clarification or have questions on the report topic."</p>	<p>consider accessibility needs when seeking clarification or information from report authors. Encourage the use of accessible formats and communication methods to ensure that all members can effectively engage in the decision making process.</p>	<p>considering the needs of all members, including those with disabilities. It ensures that communication methods are accessible to everyone, regardless of their abilities.</p>	<p>Encourage training or awareness programs to help Members of Council understand and implement accessibility principles in their communication with report authors.</p>
<p><b>Proceedings of Council Meetings and Workshops</b></p> <p>A Workshop may be closed to the public, provided that no Member discusses or otherwise deals with any matter in any way that materially advances the business or decision making of the Council or Committee. Council Members may issue staff direction.</p>	<p>We recommend specifying that closed workshops should be used sparingly and only when absolutely necessary. Encourage Council to consider alternative approaches, such as confidential memos or reports, to maintain transparency while addressing sensitive matters.</p>	<p>While closed workshops serve a purpose, their frequent use can hinder transparency and public trust. Encouraging Council to explore alternatives will help maintain transparency while addressing sensitive matters, making the policy more practical.</p> <p>What types of workshops may be closed to the public?</p>	
<p><b>Proceedings of Council Meetings and Workshops</b></p> <p>The Chair shall vote on all questions except where disqualified to vote by reason of Pecuniary Interest as set out in the Municipal Conflict of Interest Act, R.S.O. 1990, Chapter M.50, as</p>	<p>We recommend adding a provision that requires the Chair to publicly disclose any potential conflicts of interest before voting on a matter.</p>	<p>While the current wording addresses disqualification, it lacks a proactive approach to disclose potential conflicts. Requiring public disclosure before voting ensures transparency and practicality in addressing conflicts of interest within Council.</p>	

amended, or a conflict of interest.			
<b>General Comments &amp; Recommendations</b>			
<p>As a general comment, certain aspects of this procedure may inadvertently perpetuate Eurocentric norms and potentially hinder inclusivity. Historically, Eurocentric norms have often been established as the "standard" in formal procedures and rules, primarily because many of these systems have their roots in Western governance and practices. Eurocentrism tends to prioritize specific procedures and rules that reflect the cultural and institutional norms of European societies. These norms often include a strong emphasis on written documentation, top-down governance, rigid timelines, and structured formats for communication and decision making.</p> <p>Several requirements highlighted in this document, such as the need for written and signed motions, as well as strict timelines for introducing Notices of Motion, may pose challenges for individuals with diverse communication needs or those who do not adhere to traditional written formats. To enhance the policy's alignment with the principles of EDI, we recommend considering modifications that encourage flexibility in communication methods and timelines, ensuring that all members of the community can fully participate in formal proceedings. These changes aim to create a more inclusive and equitable decision making environment that respects the diversity of voices and perspectives within the Town of Halton Hills.</p>			

### Customer Service Policy

<b>Current Wording</b>	<b>Recommended Wording/Approach</b>	<b>Reasoning</b>	<b>Opportunities to Expand the Policy or Area</b>
<p><b>Assisted Devices</b></p> <p>Persons with disabilities may use assistive devices as required in accessing goods and/or services provided by the Town unless otherwise prohibited by law.</p>	<p>We recommend specifying that the Town will actively identify and address any barriers that may prohibit the use of assistive devices by persons with disabilities.</p> <p>Shift accountability to the Town in terms of how they will improve access to goods and services.</p>	<p>It is important to shift this perspective to acknowledge the Town's role in facilitating accessibility and removing barriers.</p>	
<p><b>Service Animals</b></p>	<p>We recommend specifying that any prohibitions on</p>	<p>To ensure inclusion, it's important to make it clear that the Town is</p>	

<p>Persons with disabilities are permitted to be accompanied by their service animal and keep that animal with them in areas that are open to the public when accessing goods and services provided by the Town unless otherwise prohibited by law.</p>	<p>service animals should be based on legal regulations only and not arbitrary decisions. Additionally, clarify that it is the responsibility of the Town to ensure that service animals are accommodated.</p>	<p>committed to accommodating service animals unless there are legal restrictions, and that these restrictions should be applied consistently.</p>	
<p><b>Service Disruptions</b></p> <p>In the event of a planned service disruption to facilities, services or systems that are relied upon by people with disabilities to access the Town’s goods or services, notice of the disruption shall be provided in advance.</p>	<p>We recommend specifying a clear timeframe for providing advance notice of disruptions and ensuring that alternative accommodations are readily available to mitigate the impact of the disruption.</p>	<p>To enhance accessibility, it's important to provide specific guidance on the timing of notice and the measures taken to minimize disruptions for people with disabilities.</p>	
<p><b>Format of Documents</b></p> <p>As required by Ontario Regulation 429/07, Halton Region will prepare one or more documents, describing the following, and provide them upon request to any person.</p>	<p>We recommend including a statement that the Town will make these documents readily available in accessible formats upon request to ensure that individuals with disabilities can access the information easily.</p>	<p>While Halton Region is responsible for preparing documents, the Town can work to ensure that these documents are accessible to persons experiencing disability and are provided in other languages.</p>	
<p><b>Training</b></p> <p>As required by Ontario Regulation 429/07, the following individuals will receive training on a number of topics</p>	<p>We recommend specifying that training should be provided to all individuals who interact with the public, including</p>	<p>Expanding the scope of training and emphasizing inclusivity will help ensure that all staff and volunteers understand the importance of treating</p>	<p>Consider including periodic refresher training to reinforce the principles of accessibility and inclusion.</p>

outlined in the regulation.	persons with disabilities, and that the training should focus not only on regulatory compliance but also on creating an inclusive and respectful environment.	individuals with disabilities respectfully and equitably.  AODA compliance alone will not facilitate meaningful inclusion for people experiencing disability.	
<b>Feedback Process</b>  The Town shall create and maintain a feedback process so that members of the public are able to comment on the provision of goods and services to people with disabilities.	We recommend specifying that the feedback process should be easily accessible and include options for providing feedback in various formats to accommodate the diverse needs of individuals experiencing disability.	Ensuring that the feedback process is accessible and user-friendly will encourage participation and input from individuals with disabilities.	

### Purchasing Policy

Current Wording	Recommended Wording/Approach	Reasoning	Opportunities to Expand the Policy or Area
<b>Open, Objective and Competitive Process</b>  "A minimum of three bids is solicited for purchases over fifteen thousand dollars (\$15,000) in total for the cumulative term of the purchase."	We recommend expanding the policy to encourage not only the solicitation of a minimum of three bids but also the active inclusion of diverse suppliers, including businesses owned by people from equity denied groups.		Consider implementing supplier diversity programs and tracking the participation of diverse suppliers in procurement activities.
<b>Ensure Fairness</b>  The process will be fair, such that no action is	Equitable selection criteria must be developed in order	How is fairness incorporated into the selection criteria?	Consider implementing measures to identify and eliminate potential biases in the

<p>undertaken by Town staff to allow any given bidder an unfair advantage or disadvantage.</p>	<p>for the process to be fair.</p> <p>The criteria must address any potential biases or barriers that may affect suppliers from equity denied groups.</p>	<p>Without actively integrating equitable practices and selection criteria, the process will not be fair. Without intentionally identifying the parts of the current process that may be exclusionary, as well as integrating equitable and inclusive practices, the status quo will be maintained, privileging bidders who are cisgender, white, non-disabled, etc.</p>	<p>procurement process, such as diverse supplier outreach and training for staff involved in procurement processes.</p>
<p><b>Ensure Ethical Practices</b></p> <p>The Town of Halton Hills Employee Code of Conduct shall govern appropriate conduct and decision making within the authority granted under this policy.</p>	<p>A separate decision making guide, along with standard selection criteria should be developed.</p>	<p>The current code of conduct does not support ethical decision making during procurement processes.</p>	
<p><b>Request for Information (RFI) and Request for Expression of Interest (REI)</b></p> <p>Request for Information or Request for Expression of Interest may be called to determine if there is sufficient vendor interest to justify proceeding with a competitive procurement process and/or to gain additional information on the good</p>	<p>Consider explicitly stating that RFIs and REIs should be designed to determine whether there is sufficient diversity amongst vendor interest as well.</p>		

and/or service from the vendor community...		
<b>General Comments &amp; Recommendations</b>		
<p>While this document comprehensively addresses various aspects of procurement, contract management, and financial controls, it does not consistently incorporate EDI principles into its framework. To address this gap, the following is recommended:</p> <ul style="list-style-type: none"> <li>• <b>Explicit Inclusion of EDI Principles:</b> Ensure that the selection criteria work to promote the selection of suppliers from equity denied communities. For example, consider including specific language on evaluating suppliers' diversity and equity practices in RFPs and providing guidance on how to score and assess these criteria. Explore whether the Town can prioritize selecting companies owned by people from equity denied groups.</li> <li>• <b>EDI Training and Awareness:</b> Mandate EDI training and awareness programs for employees involved in procurement, contract management, and financial controls. This training should focus on recognizing and mitigating bias, promoting diversity in supplier selection, and fostering an inclusive workplace culture.</li> <li>• <b>Supplier Diversity Program:</b> Establish a dedicated section within procurement policies to promote supplier diversity. Encourage the inclusion of diverse suppliers, such as Indigenous-owned, women-owned, and 2SLGBTQIA+-owned businesses. Actively seeking opportunities to collaborate with these suppliers.</li> <li>• <b>EDI Performance Metrics:</b> Incorporate EDI performance metrics into the evaluation criteria for suppliers, contractors, and consultants. Assess their commitment to EDI when awarding contracts or renewing agreements.</li> <li>• <b>Environmental Considerations:</b> Consider the environmental and social impact of procurement decisions, including sustainability and community benefits, to ensure that procurement practices align with broader goals of equity and environmental responsibility. Consider implementing sustainability criteria in procurement evaluations and promoting the use of suppliers with a commitment to environmental and social responsibility.</li> </ul>		

### Public Conduct Policy

<b>Current Wording</b>	<b>Recommended Wording/Approach</b>	<b>Reasoning</b>	<b>Opportunities to Expand the Policy or Area</b>
<p><b>Enforcement</b></p> <p>If a staff member experiences or witnesses any incident or behaviour that gives them cause to feel uncomfortable or unsafe, or if the behaviour falls under any</p>			<p>Consider providing guidance on how to handle incidents of discrimination or harassment, including reporting mechanisms and support for victims.</p>

of the examples noted above, the following procedures apply...			
<p><b>Responsibilities</b></p> <p>Entire section.</p>	<p>We recommend adding language that promotes a collaborative approach to resolving conflicts and cultivating positive interactions between staff and members of the public. Include information on conflict resolution and de-escalation training for staff.</p>	<p>Encouraging collaboration can help prevent incidents of unacceptable behavior.</p>	
<p><b>Privacy</b></p> <p>Entire section.</p>	<p>We recommend including information on how individuals' privacy rights will be protected during the review process and any data retention policies. Specify the procedures for handling personal information. Address where information is stored, what information is stored, and who at the Town has access to it.</p>	<p>Protecting privacy is essential when handling sensitive information related to incidents and restrictions.</p>	

## Public Engagement Charter

General Comments & Recommendations
<p>The Public Engagement Charter lacks explicit references to key elements related to EDI. It does not address the unique needs and challenges faced by marginalized communities, as well as neurodivergent individuals, or those who may encounter barriers in participating in public engagement activities due to various factors, including disability, language barriers, or discrimination. Additionally, the Charter does not outline specific actions or mechanisms for connecting with equity denied communities (e.g., unhoused persons, Indigenous communities, Black and other racialized persons, persons experiencing disability).</p> <p>We recommend the following:</p> <ul style="list-style-type: none"> <li>• <b>Incorporate Inclusive Language:</b> Revise the Charter to include inclusive language that explicitly acknowledges the Town's commitment to EDI in all public engagement activities.</li> <li>• <b>Address Barriers:</b> Identify and explicitly name potential barriers that may prevent certain individuals or groups from participating fully in public engagement, such as power dynamics, language barriers, physical accessibility barriers, and technology-related challenges.</li> <li>• <b>Explicitly Reference EDI:</b> Integrate specific references to EDI principles within each pillar of the Charter (Transparency, Notification, Participation) to emphasize the importance of these principles in shaping public engagement practices. EDI principles should be integrated throughout.</li> <li>• <b>Community Collaboration:</b> Engage with community members, including marginalized groups and EDI specialists, to inform the Charter's revisions and ensure it reflects a diverse range of perspectives, needs, and engagement methods.</li> <li>• <b>Training and Guidelines:</b> Develop clear guidelines and training programs for Town staff and stakeholders involved in public engagement to promote EDI best practices.</li> <li>• <b>Regular Review:</b> Commit to regular reviews and updates of the Charter to stay current with evolving EDI best practices and to address emerging community needs.</li> </ul>

## Inclusion Policy (Recreation)

Current Wording	Recommended Wording/Approach	Reasoning or the New Wording/Approach	Opportunities to Expand the Policy or Area
There are many personal, social, economic, environmental and health benefits to participating in recreation activities. Town of Halton Hills	Explicitly name the ways in which people experiencing disability and people from other equity denied groups are excluded from recreation opportunities.	People from other equity denied groups also experience significant barriers to accessing recreation facilities and programming. These groups/communities	Consider providing professional developments on the social, social relational, and medical models of disabilities to support employees in gaining a greater understanding

<p>invites all people to access services and participate in programs, while recognizing that individuals with a disability may face unique access barriers. Staff of Town of Halton Hills’ Recreation and Parks Department strive to ensure our facilities, programs, and services are accessible and available to meet the diverse needs of our citizens.</p>		<p>should also be recognized.</p> <p>An initial step to advancing inclusion is to explicitly acknowledge systems of oppression and how they impact various equity denied communities. Otherwise, there is a risk that the policy will replicate the dominant discourse that exclusion is the result of individual deficits (e.g., a person who has a physical disability cannot participate because their disability does not allow them to).</p>	<p>on systems of oppression.</p>
<p><b>Scope</b> This policy outlines practices that help to ensure barrier-free services for persons with a disability or <b>special need</b> participating in a Recreation and Parks Department program or service.</p>	<p>Person experiencing disability, disabled, and person with a disability are all appropriate language.</p>	<p><b>Special needs</b> is infantilizing language. Every person has different needs, regardless of whether or not they are experiencing disability. The term <b>special</b> suggests that the needs of people experiencing disability are outside of the norm. This reinforces the status quo that privileges those who are non-disabled (able-bodied and neurotypical) and positions them as “normal.”</p>	

<p>Scope</p> <p>The Town welcomes participants requiring interpretive services, mobility and adaptive equipment needs and individualized support. This includes anyone with a physical or developmental disability either congenital or resulting from an injury or illness. Participants with a disability and special need are accommodated within the scope of expertise of the recreation staff.</p>	<p>This statement must be backed up my actions that actively work toward inclusion.</p>	<p>There is a difference between welcoming individuals and taking deliberate actions to include them. This statement alleges inclusivity without making any structural changes (e.g., to policy). This type of statement serves to declare that the Town is inclusive rather than ensuring any structural changes. As a resource, please refer to the <a href="#">Re-Creation Collective's EDI practitioner tip sheet</a>.</p>	<p>Training and education must be provided to ensure that recreation staff understand how to provide disability-based accommodations.</p>
<p>Guiding Principles</p> <p>Integrated Approach – Town of Halton Hills is committed to creating a culture of inclusion where all programs and services are offered in an integrated and universal manner. Specialized programming shall be introduced when appropriate for persons with a disability as a progression to integrated settings or when no other programming offered meets their needs.</p>	<p>Consider offering para sport options (e.g., wheelchair basketball, boccia) and offer them to able-bodied participants as well.</p> <p>Consider offering a mix of both integrated and para or disability-specific programming.</p>	<p>There is conflicting research on the efficacy of and desire for an integrated approach (both non-disabled and disabled individuals participate together) to sport and recreation. An integrated approach also often seeks to integrate disabled individuals into able-bodied sports, which reinforces able-bodied sports as the standard or “norm.”</p> <p>Offering disability-specific (i.e., para) recreation programming can provide opportunity for increased confidence</p>	

		and community building.	
<p>Guiding Principles Consult, Evaluate &amp; Report – The Town works to continuously monitor and evaluate our efforts to provide accessible programs and services for everyone. The Town welcomes persons with a disability to provide input on program design and services, and works with the Accessibility Advisory Committee to ensure our approach is both efficient and effective.</p>	<p>Is there a formal feedback mechanism that has been communicated to the community?</p>		
<p>Inclusion is the right to access, use and enjoy all of the recreation facilities, programs and services in a manner that respects the dignity and independence of anyone wishing to participate.</p>	<p>Revise this definition.  Consider <a href="#">this definition of inclusion</a> provided by the University of Toronto.</p>	<p>Inclusion is about more than access. It is about meaningful participation, belonging, respect, and trust.</p>	
<p>Disability/Special Need the Ontarians with Disabilities Act (ODA) and the Ontario Human Rights Codes defines “disability” as the following:</p>	<p>Consider defining disability using the social relational model.  Cologon (2016) describes the social relational model of disability as follows: “A social relational understanding helps understand how disablement is experienced through a</p>	<p>Refer to previous comments related to the term <b>special need</b>.  This definition of disability replicates the medical model of disability which frames disability as an individual deficit, which is harmful.</p>	

	<p>threefold combination of effects. These include direct unavoidable ‘impairment effects’ on embodied functioning in the social world; ‘barriers to doing’ that are materially and socially imposed and limit access and activities; and ‘barriers to being’ reflecting demeaning words or actions negatively impacting identity and self-esteem.” Cologon, K. (2016). ‘What is disability? It depends whose shoes you are wearing’: Parent understandings of the concept of disability. <i>Disability Studies Quarterly</i>, 36(1).</p>		
<p>Mobility and Adaptive Equipment Supports</p>	<p>What types of adaptive equipment does the Town provide?</p>	<p>As previously stated, staff must be trained on providing programming to people experiencing disability. The Town should also consider prioritizing the hiring of persons experiencing disability who have experience working in recreation spaces. It is a best practice for programs, services, and initiatives to be created for specific communities by those communities.</p>	

<p>Interpretive Supports Department staff members communicate with customers in a manner that considers the person’s ability. This includes program marketing materials, notices and publications as well as program activity materials, handouts and signage <b>where appropriate.</b></p>	<p>Set standard communication requirements that integrate a variety of methods (e.g., verbal, visual).</p>	<p><b>Where appropriate</b> is vague language, meaning that diverse communication methods will likely not be consistently provided or available, thereby creating barriers.</p>	
<p>Participant-provided support Individuals who wish to participate in drop-in, registered or membership programs can apply for a “Rec Partner Pass”.</p>	<p>Consider whether the application process is necessary.</p> <p>If an individual experiencing disability brings a support person, simply allow that person to provide support with no application or fee.</p>	<p>Is an application necessary? Individuals experiencing disability may bring different people to support them.</p>	
<p>Registration in Programs – All program participants are encouraged to register well before the program start dates and indicate their disability or special need(s) on the registration form. This notation allows staff the opportunity to discuss what supports may be required well in advance of the program. This information is kept confidential, and is an</p>	<p>Staff should always work with the person experiencing disability to determine what they need to participate in the program.</p> <p>Do not use the term <b>special need.</b></p>	<p>What is meant by well before? This language is vague. The policy should state that registration must occur before a specific deadline. Undefined deadlines create confusion.</p>	

<p>essential component of ensuring a fulfilling and positive recreational experience for the participant. Recognizing that each person has unique abilities, designated staff assesses program suitability and supports to create a customized integrated experience for the participant where possible.</p>			
<p>Staff Orientation and Training The Town provides all staff and volunteers with Accessibility for Ontarians with a Disability Act [AODA] training.</p>	<p>Budget must be prioritized for training. Consider hiring an accessibility consultant and facilitator.</p>	<p>Aligning with the AODA means that many accessibility barriers will not be addressed. Many disability advocates have shared that the accessibility standards outlined in the act are not comprehensive or sufficient.</p>	<p>The Town’s recreational programming likely needs to be audited by an accessibility consultant who specializes in sport and recreation. The information included in the policy suggests that the Town has implemented an add and stir approach to including persons experiencing disability.</p>
<p><b>General Comments &amp; Recommendations</b></p>			
<p>This policy relies on making accommodations for individuals experiencing disability rather than addressing and removing barriers to participation. Consider how adaptive sports can be integrated into the Town’s programming, rather than solely making accommodations to facilitate the participation of individuals experiencing disability into able-bodied sports.</p> <p>Inclusion goes beyond disability. Newcomers, Indigenous, Black and 2SLGBTQIA+ persons (among many other groups) experience systemic barriers to participating in recreational activity. ININ recommends developing a comprehensive EDI Policy for the entire organization that includes sections that are specific to each department (e.g., recreation). Refer to <a href="#">page 3 of this tip sheet</a> for information to include in an EDI policy. While this tip sheet is situated in the context of sport, the information can still be applied more broadly.</p>			

## Youth Engagement Policy

\*Has been cross-referenced with the *Youth Programs and Services* webpage.

Current Wording	Recommended Wording/Approach	Reasoning or the New Wording/Approach	Opportunities to Expand the Policy or Area
<p>Guiding Principles</p> <p>The following principles will guide the process of Youth Engagement</p>	<p>Ensure that links remain up to date. Three out of the four links do not work.</p>		
<p>Definitions</p> <p>Words not specifically defined hereunder shall have the meaning commonly given to them in a standard Canadian English Language Dictionary with respect for the context in which such words are used.</p>	<p>Consider linking directly to one online standard Canadian English Language Dictionary.</p>	<p>For some individuals who are neurodivergent, it can be difficult to understand where they should look to find these definitions.</p> <p>It is an accessibility best practice to reference and link to other documents or policies that are mentioned.</p>	
<p>Scope</p> <p>This policy outlines practices for sustainable and effective engagement of youth for Civic Engagement within the Town. This policy will include and engage Halton Hills youth, including youth of diverse cultural, racial, and ethnic backgrounds, youth with disabilities, youth of varied sexual orientation and youth</p>	<p>Gender should be mentioned within the scope.</p> <p>Further in the policy, outline engagement strategies that consider youth of marginalized genders. For example, the Town can form partnerships with community organizations that serve girls and 2SLGBTQIA+ youth.</p>	<p>It is excellent that this policy acknowledges that different sociocultural factors must be considered when engaging with youth.</p> <p>Gender is missing from the different sociocultural factors that are to be considered when engaging with youth in the Town. Particular consideration must be given to those of marginalized genders</p>	

who might be otherwise marginalized (e.g., out-of-school, homeless, low income, etc.).		(girls, non-binary, genderqueer individuals, as well as those who are trans).	
Youth Engagement will be supported through the following organizational standards: 3) Staff is provided with information, tools, and strategies to support youth involved in civic engagement by providing training for adults on how best to work with and support youth in the community.	While specifics regarding training do not necessarily need to be stated within this policy, the Town needs to ensure that the information, tools, and strategies provided to staff are culturally responsive and culturally competent.	Are different sociocultural factors considered in the training provided to staff? Youth engagement strategies should be culturally responsive. If they are not, then it would be considered an equity-neutral approach, which reinforces and maintains the status quo. The status quo prioritizes those who are cisgender, white, non-disabled, a man/boy, etc.	
Policy Review and Reporting Annually, staff monitor documents and recommend policy and procedure changes for consideration by the Corporation and/ or Department Management or upon the update of legislation and/or industry standards.	Greater specificity regarding the process is needed.	Which staff are responsible for monitoring documents and recommending changes? How do staff report changes that need to be made? What is the process? Who or which staff group is responsible for evaluating and making the recommended changes to policy and procedure?	
Procedure 1.2 – Advisory committees	Procedures should delineate the steps that should be taken to achieve the purpose stated in the related policy.	What is the procedure for recruiting members of the community who are youth to serve on Town advisory committees? What is	

	<p>An additional consideration when developing procedures is to use a numbered step-by-step process to make them more accessible. Another consideration is to add boxes that can be checked off next to each step in a procedure as this may help some neurodivergent individuals understand what they need to do next and assist them in monitoring their progress. This recommendation applies to other Town procedures.</p>	<p>stated here is not a procedure. The lack of specific, actionable steps will result in inconsistent applications of this policy and procedure, which may be influenced by individual biases.</p>	
<p>Procedure 2.1 – Recruitment Include opportunities for civic engagement on the High school’s volunteer information sheets.</p>	<p>Consider integrating <a href="#">guidelines on public participation/engagement</a> developed by the International Association of Public Participation (IAP2).</p>	<p>How does the Town determine what these opportunities are?</p> <p>When looking to engage youth and/or adults in the community, it is important to set clear goals of each engagement, as well as what the Town will be promising to the public. This will help to build trust with community members. One example is when community feedback is solicited but never integrated, and the</p>	

		<p>final program or initiative is not shared with the engaged community members. This lack of communication and transparency can lead to a breakdown in trust throughout the community and make individuals less likely to want to engage in the future.</p>	
<p>Procedure 2.1 – Recruitment Connect with the local youth servicing agencies in Halton Hills to provide an opportunity for recruitment and information sharing.</p>	<p>There is an opportunity to integrate specifics on how community organizations who serve youth from equity denied groups (e.g., disabled, 2SLGBTQIA+, Indigenous youth) will be engaged with. Specifically, the Town should provide examples of how it will engage with Indigenous youth, youth experiencing disability, trans youth, etc.</p>	<p>This is a great place to connect procedure to the scope of the policy. The scope of this policy states that the Town will engage with youth from different backgrounds, socioeconomic statuses, and identities. There is a lack of information regarding how the Town will do this. The same engagement strategies will not be effective for youth from different equity denied groups.</p>	
<p>Procedure 2.1 – Recruitment When providing communication for the recruitment of youth for civic engagement, staff should include but are not limited to utilizing the following communication methods:</p>	<p>Consider stating that a minimum number (e.g., three) of communication methods should be used each time.</p>	<p>Several communication methods should be used simultaneously to promote accessibility and increase outreach.</p>	

<p>Procedure 2.2 - Transportation Youth may not have access to transportation to attend meetings, focus groups, and workshops based on the selected location. Transportation might need to be provided to youth that would include, scheduling a taxi or a bus for the youth. If applicable, budget will have a minor impact related to the initiative or project.</p>	<p>Accessible transit options should be integrated into this section.</p>		
<p>Procedure 2.4 – Tracking and monitoring Youth involved within advisory committees should be required to provide a resume and applicable application. <b>Appropriate</b> tracking and record keeping practices will be put in place for advisory committee applications.  When providing documentation for a youth in terms of a reference letter or confirmation of volunteer hours, please refer to Human Resource’s Reference Letter Policy and the Recreation &amp; Parks</p>	<p>Greater specificity is needed regarding how youth will be notified of the application requirements and what are considered to be appropriate tracking and record keeping practices.  For record keeping that includes Indigenous youth, the First Nations Principles of OCAP (ownership, control, access, and possession) should be followed.  Link directly to the mentioned policies and procedures. This recommendation should be applied to other Town policies and procedures.</p>	<p>How are youth notified of these requirements/ suggestions?  The term <b>appropriate</b> is vague and will likely lead to inconsistent applications of this procedure.  For some individuals who are neurodivergent, it can be difficult to understand where they should look to find these other policies and procedures.</p>	

Department's volunteer procedures for volunteer letters.			
Procedure 3.1 – Staff orientation and training	Consider providing training on cultural competency.	For staff to be able to meaningfully and respectfully engage with youth who have different identities and backgrounds, they should have an understanding of cultural competency. This is needed for staff to be able to consider and appropriately respond to the different needs of youth.	
Procedure 4.2 – Policy evaluation Annually, staff monitor and document recommended policy and procedure changes for consideration by the Corporation. Staff will utilize community partners and provincial/national organizations to access resources, training materials, best practices and legislation.	Refer to comments made in relation to the Youth Engagement Policy.  Consider adding specific information as to how youth will be engaged in future policy/procedure revisions and evaluations.	Refer to comments made in relation to the Youth Engagement Policy.  How will youth be engaged during revisions and evaluations? Will feedback be solicited?	
Town of Halton Hills Youth Programs and Services webpage	Add accessibility consideration to the Recreation Activity section.  For the Recreation Activities section, consider indicating which activities and	The Youth Stories section of the website is excellent – it is great that the Town is showcasing youth in the community.  Generally, when accessibility is not	

	locations are accessible. The type of accessibility (e.g., accessible to wheelchair users, people who have vision loss, people who are d/Deaf or hard of hearing, neurodivergent, etc.).	explicitly mentioned, it signals that the event/activity/location is inaccessible.	
<b>General Comments &amp; Recommendations</b>			
While guiding principles for youth engagement are stated on the first two pages of the policy, no clear process it outlined that integrates these principles. The lack of process specific to the Town may make it difficult for individuals to understand how youth are to be engaged and will lead to inconsistencies in the implementation of this policy.			

#### Affordability Policy Framework

<b>Current Wording</b>	<b>Recommended Wording/Approach</b>	<b>Reasoning or the New Wording/Approach</b>	<b>Opportunities to Expand the Policy or Area</b>
<p>Purpose Recreation exposes children to positive role models and gives them opportunities to learn important leadership skills.</p> <p>Participation in recreation can also have a positive impact on the community. When children from families with low income participate in sport and recreation, their families' need for other services such as social workers, doctors, hospitals, children's aid and medications is reduced (Gina Browne</p>	<p>Explicitly acknowledge the systemic inequities that exist in recreation and sport.</p> <p>Consider stating the types of skills that children may learn through engaging in recreation. These skills must go beyond broad categories, such as leadership skills.</p> <p>Consider updating the reference used throughout this section and consider a study that utilizes an intersectional approach.</p>	<p>It is important to consider how recreation and sport have been used as tools of assimilation. Settler colonialism is also oftentimes reproduced through recreation and sport. Not naming the systemic inequities that exist in recreation and sport will result in them being reproduced and maintained.</p> <p>Recreation and sport can be used as an opportunity for social change and community building. This is something that should</p>	

<p>et al., Benefiting all the Beneficiaries of Social Assistance, 1999).</p>		<p>be reflected in the purpose statement.</p> <p>The reference used in this section is more than 20 years old. The referenced study also does not seem to consider intersectionality and how Indigenous, disabled, Black, and 2SLGBTQIA+ children and youth may be impacted in different ways by accessible recreation programs.</p>	
<p>Scope Poverty has many faces. It can include people already on social assistance, the working poor, parents raising large families on low incomes, single parents on low incomes, seniors receiving the Guaranteed Income Supplement (GIS) and new Canadians.</p>	<p>Consider using adults/families living on low-income.</p>	<p>The working poor is not the most current or respectful terminology.</p>	
<p>Guiding Principles Equitable - All residents of Halton Hills deserve the right to play, and benefit from Town of Halton Hills facilities, programs and services. The Town is committed to removing financial barriers to create equal access to recreation</p>	<p>Ensure that specific actions are included that demonstrate how the Town will remove financial barriers.</p> <p>Ensure that the feedback mechanisms for providing input are stated.</p>		

<p>opportunities for low-income families.</p> <p>Consult, Evaluate &amp; Report – The Town welcomes input from residents of Halton Hills through various methods and each year completes a Recreation and Parks internal assessment.</p>		
<p>Recreation and Parks will assess each affordability issue on an individual basis.</p> <ul style="list-style-type: none"> <li>- Adults requesting financial assistance for a community recreation and sport program will be referred directly to the sport organization.</li> </ul>	<p>Does the Town not provide subsidized recreation opportunities to adults?</p>	<p>If the Town does not already provide financial assistance to adults, this is something that should be explored.</p> <p>Recreation and sport also have a myriad of physical, mental, and emotional benefits for adults, not just youth.</p>
<p>What is their story? Occasionally there are circumstances where families or individuals are in financial need, but this is not reflected in the income testing process. For example, it may be a temporary situation where a family member has become sick, injured or recently unemployed and their income statement from the previous year does not reflect this. It is therefore important to ensure that the process provides an</p>	<p>Beyond the other indicators of poverty that are listed, can families or individuals provide a statement that explains their circumstances? Not all individuals will access formal external organizations/ groups/ funding, such as housing grants, and social and health agencies.</p>	

<p>opportunity for the family or individual to tell their story and that there is built-in flexibility in the eligibility process to assist these special circumstances. Other indicators of poverty for the working poor may be the following:</p>			
<p><b>Evaluation</b> The unique and diverse needs of recreational participants in Town of Halton Hills programs are evaluated regularly. The Town assesses their ability to provide barrier free access to recreation programs using a variety of evaluation tools and resources including those from the Everybody Gets to Play – Organizational Assessment Toolkit. This toolkit can measure an organization’s ability to provide barrier free access to recreation programs in five different categories – Understanding the Issues, Building Awareness, Gaining Commitment, Implementation and Sustainability.</p>	<p>Consider developing standard assessment criteria. Include as an appendix.</p>	<p>Does the Town have formal assessment criteria that integrates a variety of evaluation tools and resources? While tools and resources are referenced, it is unclear if the same tools and resources are utilized each time an assessment takes place. A lack of standardized assessment criteria may lead to biased decision making.</p> <p>Consider whether the evaluation tools and resources that the Town uses consider intersectionality. A variety of factors can influence an individual’s socioeconomic status.</p>	<p>An additional consideration is the backgrounds and identities of the individuals who are conducting the assessments. Every person has their own biases, which could influence decision making in the assessment process. At minimum, every person conducting these assessments should have training on cultural competency and systems of oppression.</p>

Subsidy Amount	<p>Explore reviewing whether the subsidy can be increased.</p> <p>Consider reviewing the subsidy amount at consistent intervals (e.g., every two years).</p>	<p>This framework is dated 2010. The cost of living has changed substantially since this year. Explore whether the \$300 per child per session subsidy can be increased.</p>	
Process - References to parent	<p>Consider replacing the term <b>parent</b> with <b>guardian</b>.</p>	<p>The term <b>parent</b> is not inclusive of different types of families.</p>	
Appendix A Income Testing Scale – Based on Stats Canada 2007 LICO Index (for Population of 30,000-99,999)	<p>The income testing scale should be updated on a consistent basis.</p>	<p>This Statistics Canada data is not current. The scale should be redeveloped using current Statistics Canada data.</p>	
Appendix C Financial Assistance and Support Services	<p>The names of individuals are referenced.</p> <p>Consider how the Town will keep this information up to date to ensure that individuals know who to contact and how to contact them.</p>		
<b>General Comments &amp; Recommendations</b>			
<p>Many community organizations and groups have pre-existing recreation opportunities. One gap identified in this framework is a lack of recognition of recreation opportunities that exist in the community. Specifically, this could be integrated into the Coordinated Approach principle.</p> <p>Consider providing dedicated funding opportunities for youth from equity denied groups to further address financial barriers to accessing recreation opportunities.</p> <p>Funding should be reflective of the current economy and cost of living.</p>			

#### 2021 Specialized Transit Plan

<b>Current Wording</b>	<b>Recommended Wording/Approach</b>	<b>Reasoning or the New Wording/Approach</b>	<b>Opportunities to Expand the Policy or Area</b>
<p>4: Short Term Recommendation and Midterm Directions Report</p> <p>- Entire section</p>	<p>If not already done, consider exploring how community members access different spaces in the Town and determine whether</p>	<p>There's an opportunity to ensure that ActiVan services, including transfer points, consider patterns of access to key areas in</p>	

	<p>ActiVan currently serves the needs of the community.</p> <p>Engage individuals who are experiencing disability in user testing.</p>	<p>the community, such as public parks, schools, graveyards, libraries, or recreation centres. By monitoring they different ways individuals access spaces in the community, the Town can make informed decisions about routes ActiVan should increase service delivery to.</p> <p>Does current Town infrastructure support access to ActiVan transfer points? For example, are there adequate curb cuts, snow clearing, tactile indicators, etc. at these points to facilitate access for people experiencing different types of disabilities?</p>	
<p>5.1 Current State of Service</p> <p>Ad-hoc Taxi &amp; Dedicated ActiVan Service</p>	<p>Consider the types of activities, events, and programs individuals experiencing disability (namely those who use ActiVan) are accessing or participating in to determine whether ActiVan service hours are facilitating meaningful participation in the community.</p>	<p>What is the cost differential between the ad-hoc taxi service and dedicated ActiVan service? If there is a large cost differential between the two, then that may impact the ability for individuals experiencing disability to participate in the community. Considering that ActiVan does not operate during the evenings, community</p>	

		<p>members may not be able to participate in activities, events, or programs that occur during the evenings if they are unable to afford taxis. Ultimately, the operation hours of ActiVan are likely preventing some individuals from meaningfully participating and engaging in their community in the ways they want to.</p> <p>Section 5.4 of this plan begins to address these concerns, but further actions are needed.</p>	
<p><b>Adjust for ridership growth due to fare changes</b></p> <p>Two recommended fare changes, the introduction of a \$100 monthly pass and the setting of a single fare trip to \$4 for all trips are expected to have a significant effect on ridership.</p>	<p>This fare cost is not equitable. Consider a transit subsidy.</p>	<p>A single fare rate of \$4 is high for transit. This is more expensive than many major municipalities in Ontario (e.g., <a href="#">City of Toronto</a>). Some people experiencing disability experience less financial security due to barriers to accessing jobs or having to pay for healthcare and medical supplies. The fare cost may be a barrier to accessing ActiVan and subsequently to participating in the community.</p>	

<p>5.4 Service Plan</p> <p>The AODA also requires specialized transit to operate during all hours during which the conventional transit service is operating. UAS is a conventional service that is planned to operate on weekdays from 6:00 AM. This requires an extension of ActiVan’s operating hours.</p>	<p>In alignment with the report, ININ also recommends matching ActiVan’s service hours with those of conventional transit.</p>	
<p>6: Technology Recommendation</p>	<p>An additional consideration is whether there is a potential alternative to scheduling software. Some older adults, as well as individuals who have a lower income, may not have access to technology, which would impact their ability to access ActiVan services.</p>	
<p>7: Process and Policy Recommendations</p> <p>Update fare structure to a flat fare of \$4 for all time periods</p>	<p>Refer to previous comments made in relation to the \$4 fare.</p>	
<b>General Comments &amp; Recommendations</b>		
<p>An additional consideration that should be examined when determining service areas for ActiVan is whether those service areas prioritize lower income neighbourhoods, as well as neighbourhoods that have a greater proportion of renters. Individuals who live in these neighbourhoods may be less likely to be able to afford a personal vehicle. This can be compounded by having additional health and living costs associated with experiencing disability (e.g., be forced to pay out of pocket for medical supplies, paying for accessible home modifications). When considering expanding ActiVan service hours, explore the option of first expanding those hours to specific neighbourhoods or areas in the Town.</p>		

## Business, Environment &amp; Culture: 2023 Budget &amp; Business Plan

Current Wording	Recommended Wording/Approach	Reasoning or the New Wording/Approach	Opportunities to Expand the Policy or Area
<p>Advanced Truth and Reconciliation and Equity, Diversity and Inclusion initiatives through relationship building, program delivery, communications, and training and capacity building.</p>	<p>Communicate the specific objectives and initiatives related to TRC.</p>	<p>Greater levels of detail are needed to maintain public transparency. What are the specific TRC initiatives the Town is advancing?</p> <p>This bullet point suggests that more systemic changes are being made regarding TRC; however, no specific examples or actions being taken are stated.</p>	
<p>1. Non-residential investment attraction - Increase in quality local job opportunities.</p> <p>2. Business retention, expansion and resiliency plan</p> <p>3. Community improvement plan (CIP) - Increased private sector investment in priority areas, including downtown beautification, energy efficiency and affordable housing.</p> <p>4. Housing affordability</p>	<p>Consider implementing an approach that aligns with the UN Sustainable Development Goals.</p> <p>There should be opportunity for individuals to invest in their community.</p> <p>Consider developing guidelines that prioritize individual and community-based entrepreneurship as primary modes of driving economic growth.</p> <p>Consider accessibility of housing in addition to affordability. Accessible housing is</p>	<p>The privatization of businesses and land use that favours external individuals/ groups with large investment capital negatively impacts people from equity denied groups. For example, the privatization of land use can impact costs of living for individuals in the community and the accessibility of services are not guaranteed. The capital gain from these investments will primarily be seen by the investors and not the community.</p> <p>In relation to housing affordability, private</p>	<p>Consider revising procurement processes to prioritize small business development.</p>

	generally expensive and very difficult to find.	<p>developers have primarily been developing high-cost housing in Canada, which increases the overall cost of housing in a community. Greater consideration must be placed on how the Town will ensure that private investments result in more affordable and accessible housing.</p> <p>Small, community-based businesses have the potential to create a more resilient economy.</p>	
<p>5. Arts and Culture</p> <p>- Phase 2 of the public art process for Indigenous artwork in the Library &amp; Cultural Centre Plaza completed.</p>	How does this item link to the Town’s Truth and Reconciliation (TRC) initiatives?		
7. Truth and Reconciliation	Consider linking the outcomes and outputs to the TRC Calls to Action, Missing and Murdered Indigenous Women and Girls (MMIWG) Calls for Justice, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Doing so can allow the Town to align with what Indigenous communities across Turtle Island are calling for.		
9. Retrofit Halton Hills	There is a lack of consideration of accessibility in the outcomes and outputs of this initiative.		
10. Corporate Facility Energy Efficiency	<p>How might the community be engaged in this initiative? Consider the <a href="#">International</a></p>	There is mention of private sector engagement in this initiative, but not	

	<a href="#">Association for Public Participation's (IAP2) guidelines on public participation.</a>	community engagement.	
Staffing Impact – full time and part time staff	<p>Ensure that there is adequate staffing to implement EDI and Reconciliation initiatives.</p> <p>EDI and Reconciliation should not be grouped together. Indigenous expertise must be a core component of Reconciliation. While it is stated in the RFP for this project that EDI and Reconciliation are separate, this plan does not clearly demonstrate that.</p>	<p>How many staff are dedicated to EDI? How many staff are dedicated to Reconciliation? These two items must be prioritized in budget and cannot be left out of job descriptions. Oftentimes, EDI and Reconciliation work is taken on by current staff who hold marginalized identities, and they end up doing this work in addition to their typical workload. This places the burden of advocacy and systems change on the communities and individuals who are experiencing the most harm.</p>	
Pre-Budget approval during the 2022 budget process to fund a Public Art Coordinator – Two Year Contract (\$95,300) within Cultural Services to enable the Manager of Culture and Equity, Diversity and Inclusion to lead the Town's Truth and Reconciliation, and Equity, Diversity and Inclusion workplan,	<p>While the Town has started the process of developing a distinct EDI Action Plan, any future plans dedicated to Reconciliation should be separate.</p> <p>Reconciliation must be considered separately. This includes establishing senior level staff positions dedicated to Reconciliation.</p>	<p>It is important to ensure that Reconciliation is not blended into EDI initiatives. Settler colonialism and systemic racism impact Indigenous peoples in distinct ways. Indigenous sovereignty, self-governance, land rights, etc. are distinct issues from other equity denied groups.</p>	<p>Develop a distinct and separate Reconciliation Action Plan.</p> <p>Continue to engage with Indigenous consultants on developing a Reconciliation Action Plan.</p>

<p>while continuing to advance the Town's overall Cultural Service program, including cultural programming, industry supports and the Public Art Program.</p>			
<p>An on-going annual budget provision of \$45K to advance the Equity, Diversity, and Inclusion (EDI), and Truth and Reconciliation (TRC) implementation actions.</p>	<p>Dedicated budget for EDI and Reconciliation must be prioritized in the final EDI Action Plan.</p>	<p>EDI and Reconciliation budgets communicate a commitment to the work. This budget will not adequately address the need for dedicated staff (in addition to the staff mentioned in this plan), external consultants, and initiative/ program/ service implementation.</p>	
<p><b>General Comments &amp; Recommendations</b></p>			
<p>EDI is exclusively under the purview of Cultural Services; however, it is unclear how EDI initiatives and programs are being integrated across the corporation.</p> <p>Truth and Reconciliation are also separated in this strategy. While TRC should remain separate from EDI, it should still be integrated across this strategy. Reconciliation must be embedded into everything the corporation does. For example, consider how Indigenous land rights being considered in investment attraction, and business retention and expansion.</p>			

## Key Findings & Strategies to Consider

### 1) Power Dynamics and Accountability

Many of the documents reviewed use a top-down approach that dictate, for example, how decisions will be made. However, there are a lack of mechanisms in place to hold the Town accountable for biased decision making that may occur and to follow through on internal investigations. Policies and procedures should be multi-directional, meaning that they should not only establish clear expectations and responsibilities for the Town and its employees but also provide channels for residents to actively engage and participate in the governance process. This approach fosters a sense of shared responsibility, ultimately leading to a more responsive and inclusive municipal government that better serves the needs of its employees and community members. Town documents are also structured and worded in ways that do not demonstrate how the Town is going to, for example, support employees when they have experienced harm, which may contribute to a lack of psychological safety in the workplace. Documents also lack accountability mechanisms. For example, the lack of accountability measures (e.g., timelines) makes it difficult to hold the Town accountable to following through on various processes. ININ recommends building accountability mechanisms into all Town documents. These mechanisms should include timelines as well as outline what will happen (e.g., an investigation process will be initiated) if the Town does not meet the timelines that they have set for themselves.

### 2) Workplace Accessibility & Accommodations

Accommodations are a gap in the Town's policy library. Specifically, no guidelines are provided on how requests for accommodations will be managed or how employees go about requesting accommodations. It is important that employees are supported in the workplace and that they are given the tools they need to be able to perform their jobs. While the Town has policies in place that begin to address accommodating employees, such as the Alternative Workplace Policy, there is not a distinct mechanism and policy for accommodating staff. ININ recommends that the Town create a dedicated Accommodations Policy and Procedure. This policy should outline examples of different types of accommodations employees may need, as well as link to related policies (e.g., Alternative Workplace Policy, Work from Home Procedure). For example, the Alternative Workplace Policy could be temporarily applied to an employee if they are returning to work after having surgery.

### 3) Language

Written documentation can reproduce and maintain systemic inequities, thereby causing exclusion for people from equity denied groups. However, written documentation can also be used to support structural changes to an organization and facilitate inclusion. Language can influence how documents are perceived and implemented. Consistently using inclusive and accessible language ensures that all Town staff can understand documents and what is expected of them. Using inclusive and accessible language will also enable residents, regardless of their background, abilities, or language proficiency, to fully engage with and comprehend public facing documents, by-laws, and plans. Policies and procedures that are concise and free of jargon are easier to navigate and are more accessible.