



OTTAWA-CARLETON
DISTRICT SCHOOL BOARD

Office of the Human Rights
and Equity Advisor



FIRST ANNUAL PUBLIC REPORT

March 2020 to August 31, 2023

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Introduction

This report highlights the work of the arm's length Office of the Human Rights and Equity Advisor (O-HREA) from its establishment in March 2020 until August 31, 2023. It provides an opportunity to reflect on the human rights mandate of the new office, and its capacity to support the OCDSB to advance human rights-based organizational change. It also provides an opportunity to reflect on changes needed to remove systemic barriers that prevent students and staff from learning and working in an environment that is free from discrimination.

The inherent dignity and equal rights of all people is enshrined in the *Universal Declaration of Human Rights* and reflected in the *Canadian Charter of Rights and Freedoms* and the *Ontario Human Rights Code*.

The separate and distinct rights of Indigenous peoples are enshrined in the United Nations Declaration on the Rights of Indigenous Peoples and federally, in the *United Nations Declaration on the Rights of Indigenous Peoples Act*.

The *Ontario Human Rights Code* protects OCDSB students and staff from discrimination and harassment on the basis of citizenship, race, place of origin, ethnic origin, colour, ancestry, disability, age, creed, sex, family status, marital status, sexual orientation, gender identity and gender expression while at work or when receiving an education.

The Ottawa-Carleton District School Board (OCDSB) is a community that values acceptance, appreciation, cooperation, empathy, fairness, integrity, optimism, perseverance, respect, and responsibility. It is committed to building a community vested in human rights by:

1. creating a climate of understanding and mutual respect for the inherent dignity, equality, and worth of each person;
2. advancing equity and eliminating all forms of discrimination so that each person feels part of the OCDSB community and is able to participate fully when learning, working, or accessing services;
3. building trust through transparency and a commitment to accountability;
4. remedying harm and working to restore relationships when it does not meet these standards; and
5. fostering spaces of belonging where everyone is valued and can thrive.

Establishment of Office of the Human Rights and Equity Advisor

The Human Rights and Equity Advisor (HREA) role was established by the OCDSB in March 2020. Funding was provided by the Ministry of Education to establish the role as part of a pilot, initially involving only a small number of school districts. The initiative has subsequently expanded to include a large number of school districts across Ontario. The purpose of the

role is to foster a culture of human rights; maintain welcoming, respectful school and work environments; and, meet its legal obligations under Ontario's *Human Rights Code*.

The HREA reports to the Director of Education. The Director of Education ensures the HREA operates impartially, at arm's length, and without interference. The role at the OCDSB remains funded directly by the Ministry of Education, and is not yet included in OCDSB annual budget.

The Human Rights and Equity Advisor role has two main objectives:

1. Building and maintaining a culture of respect for human rights

Through leadership, education and training, relationship-building, and participating in system-level decision-making, the HREA supports the OCDSB to identify and address systemically-based human rights and equity issues and build the OCDSB's capacity to ensure compliance with the Ontario *Human Rights Code*.

2. Supporting the resolution of human rights complaints

Using their expertise and proven experience in human rights investigations, complaint resolution and restorative justice, the HREA oversees the OCDSB's internal human rights complaints procedure.

In January 2022 the OCDSB Board of Trustees approved OCDSB's first human rights policy, [P.147.GOV](#) Human Rights. The policy enshrines OCDSB's commitment to upholding and safeguarding Indigenous rights, human rights and, more specifically, children's rights. The policy also sets out the mandate for the [Office of the Human Rights and Equity Advisor](#) (O-HREA). It requires the O-HREA to operate at arm's length and free of interference. The role of the O-HREA includes:

1. advising the OCDSB community about their human rights and obligations;
2. investigating, mediating, and addressing human rights concerns and complaints independently, impartially, and fairly under this policy and associated human rights procedures;
3. making findings and recommendations to address human rights concerns and complaints;
4. monitoring human rights trends and producing regular public reports on human rights concerns, and complaints, and system-level recommendations made within the District;
5. initiating reviews, inquiries, environmental scans, or investigations where it reasonably believes that rights under the human rights policy may have been violated, including in the absence of a complaint; and
6. advancing organizational change in the District through:
 - a. identification of systemic issues;
 - b. professional development, education, and capacity building to ensure compliance with the human rights obligations;

- c. policy review and development;
- d. outreach and engagement; and
- e. research, evaluation, and reporting on the OCDSB’s human rights record.

The O-HREA is committed to promoting and protecting the human rights of students, families, staff, and the broader school community and supporting the OCDSB in understanding and upholding its human rights obligations. The O-HREA acts on human rights complaints confidentially, fairly, and promptly and provides leadership and advice within the OCDSB community to help people better understand their human rights and responsibilities, and prevent discrimination and harassment.

The O-HREA addresses human rights concerns applying OCDSB policies and procedures as well as relevant legislation including the Ontario *Human Rights Code*. It follows principles of procedural fairness and considers policy guidance published by the Ontario Human Rights Commission during its process.

The O-HREA was initially staffed by the Human Rights and Equity Advisor, and a half-time Administrative Assistant. In November 2021, the O-HREA was expanded to include two Human Rights Officers. In September 2022, the one term contract position was reduced because of budget constraints. The office currently includes the HREA, one Human Rights Investigator, and one half-time Administrative Assistant.

Building and Maintaining a Culture of Respect for Human Rights

One objective of the O-HREA is to support the OCDSB to build and maintain a culture of human rights. The following highlights some of the key areas of engagement over the reporting period.

Professional Development, Outreach, and Awareness Raising

Professional Development: During the reporting period, the O-HREA supported and delivered a number of human rights-related professional development opportunities across the OCDSB.

Date	Description	Participants
August 2020	The O-HREA, in collaboration with two educators, developed and delivered a 4-hour course on Fundamentals of Human Rights for Educators as part of the OCDSB Summer Institute.	30 educators
September 2020	The O-HREA selected anti-racism training from the Ontario Human Rights Commission that was delivered to all OCDSB staff as part of their mandatory professional development.	N/A

Date	Description	Participants
October 2020	The O-HREA provided technical input into a Human Resources department training on how to avoid discrimination in the hiring process, and how to identify and address unconscious bias. The training was for the Principal/Vice-Principal (P/VP) selection panel.	N/A
November/ December 2020	The O-HREA produced a narrated training session on the harm caused by slurs and epithets that was delivered to every educator and administrator in the District during staff meetings.	7,822 staff members
December 2020	The O-HREA delivered training on Bias Aware Discipline at a school in response to concerns about biased disciplinary practices of staff that were raised by the Principal to the HREA.	25 staff members
2020 - 2022 Four classes	The HREA was a guest speaker at social justice classes at the secondary level.	25 students each time
February 2022	The HREA provided technical support to the development of training for elementary educators on how to engage with sensitive or controversial materials, including about racism or 2SLGBTQ+ issues, in the classroom.	4,900 educators
February 2022	The O-HREA delivered training as part of the Supervisory Officer training course on the role of the O-HREA and priority human rights issues in the education context.	10 attendees
February 2022	The O-HREA delivered training to approximately 150 office administrators on gender identity markers in school records.	150 office administrators
March 2022	The O-HREA presented on equity, diversity, inclusion and belonging at an elementary school staff meeting.	40 people
March 2022	The O-HREA delivered training on the duty to accommodate students with disabilities and students' religious practices at a high school staff meeting.	20 staff members
March and April 2022	In collaboration with the Human Resources department, the O-HREA delivered training to hiring managers on equitable hiring practices.	200 managers
May 2022	At the request of the ETFO Occasional Teachers Federation, the O-HREA delivered training on human rights considerations for occasional teachers.	4 members
June 2022	The O-HREA attended a secondary school to discuss human rights inclusion standards, discrimination and harassment and how to raise human rights concerns.	22 students

Date	Description	Participants
January 2023	The O-HREA delivered training to a group of educators from Eastern Ontario as part of their Supervisory Officer Qualification Program (SOQP). The O-HREA presented on the role of the Office of the Human Rights and Equity Advisor and steps that supervisory officers can take to centre human rights in their work.	8 candidates
February 2023	The O-HREA joined the 2SLGBTQ+ experiential learning class to discuss human rights with the students, as well as the OCDSB's obligation to address discrimination towards members of the 2SLGBTQ+ community and the role of the Office of the Human Rights and Equity Advisor.	N/A
March 2023	The HREA met with students in a civics class at Earl of March Secondary School to share information about the O-HREA, human rights, human rights career paths and inclusion.	N/A
March 2023	The O-HREA facilitated a session for Indigenous, Black and Arab parents on school discipline in collaboration with community partner Parents for Diversity.	30 parents
May 2023	The O-HREA facilitated a training session for Principals and Vice-Principals on the OCDSB Anti-Hate Protocol.	160 principals and 111 vice principals
May 2023	The O-HREA facilitated a small group discussion session from trustees across Ontario as part of the Ministry of Education and Osgoode Law School's professional development series on disability and education.	8 trustees
June 2023	The O-HREA facilitated a webinar for Indigenous, Black and Arab parents, in collaboration with community partner, Parents for Diversity, on school discipline and the Ontario Student Record (OSR).	40 parents

Outreach and Awareness Raising: In 2020, the O-HREA established a [webpage](#) to share information about the role and mandate of the office, human rights-based consultations, provide human rights-related resources and share information with the public about how to contact the office for support. During this reporting period, the O-HREA webpage was viewed 3252 times by 2146 users.

In November and December 2020, respectively, the Board approved a consultation plan for the review of police involvement in schools and to develop a human rights policy.

The O-HREA took on the role of the technical lead on the human rights-based review of police involvement in OCDSB schools. Guided by a steering group made up of community members and students, the consultation included a survey as well as numerous opportunities for students, families, community members and staff to share perspectives about impacts and recommendations for the way forward.

A second O-HREA initiated consultation during the same time period sought feedback from the community on important elements to consider in the development of a human rights policy and procedure. The consultation involved focus group discussion and surveys. The results of the survey can be found [here](#). Information gained from this consultation was used to inform the development of the first OCDSB Human Rights Policy [P.147.GOV](#) and will be used to develop associated procedures.

As part of these consultations, the O-HREA led virtual, small group discussions with students, staff and community members. The groups were identity based, to create safer spaces for the sharing of information. Small group discussions were held for members of Indigenous, Black, racialized, faith-based, disability and 2SLGBTQ+. Small discussion groups were also offered in Arabic, Somali, Mandarin and Cantonese. This is the link to the [Human Rights Policy Consultation](#) page and the promotion [video](#).

In total, 11 group discussions were held with students, 18 group discussions were held with parents and community members and 18 group discussions were held with identity based employee resource groups.

Human Rights-based Changes to Policy and Procedure

During the reporting period, the O-HREA provided advice to support a number of important, human rights-based, policy, procedure and practice changes.



Changes to policy and procedure: In October 2020, the OCDSB Indigenous, Equity and Human Rights [Roadmap](#) was publicly launched. The Roadmap details commitments made by the District to advance equity with a particular focus on addressing anti-Indigenous and anti-Black racism. It contains measurable goals and indicators, designed to promote transparency and accountability for commitments made.

In November 2020, the Director of Education issued a District-wide directive, prohibiting the verbalization or writing of slurs and epithets by educators in the classroom. This directive was reinforced as a mandatory staff meeting agenda item in January 2021 and in professional development opportunities later in the year. A number of school districts contacted the OCDSB seeking advice on how to advance a similar initiative within their own district and the HREA presented the approach to the Ontario Public Supervisory Officers' Association (OPSOA) in April 2021.

In April 2021, [P.146.HR](#) Equitable Recruitment, Hiring and Promotion policy was passed by the Board of Trustees. The policy incorporates recognition of Indigenous rights and human rights and creates space for the recognition and valuing of lived and other experience when assessing suitability for a position.

In June 2021, the Board of Trustees voted to adopt the O-HREA's [recommendations](#) arising from the human rights-based review of police involvement in schools. The Board passed a motion to end participation in the Ottawa Police Service's School Resource Officer program and to limit police involvement in schools to only [occurrences requiring police involvement](#) under the Provincial Protocol. Shortly after, the Ottawa Police Service discontinued its school resource program across all four Ottawa school districts. The O-HREA report was cited by the Ontario Human Rights Commission when it issued provincial level recommendations related to police involvement in schools in July 2021.



In or around November 2021 the OCDSB updated its [guidelines](#) on fostering learning spaces inclusive of gender identity and gender expression. The updated guidelines moved away from a position focused around accommodation and towards a position of inclusive design where learning spaces actively ensure diverse gender identities and expressions are represented and considered.

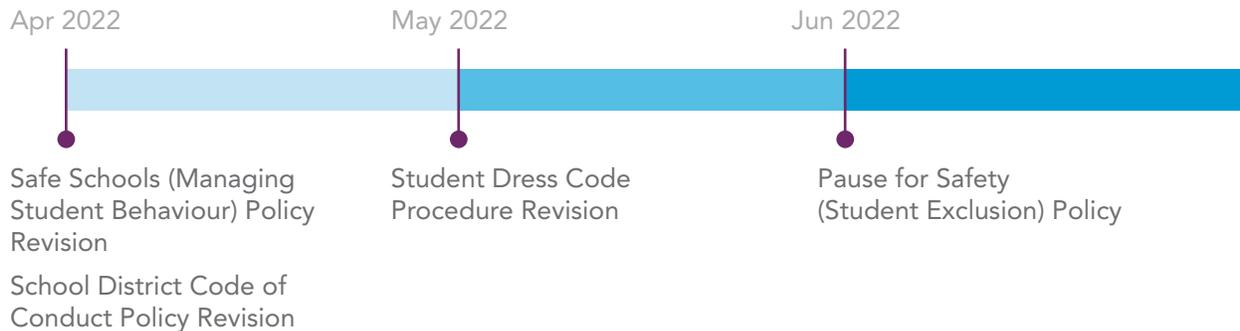
In January 2022, the OCDSB's first policy on human rights, [P.147.GOV](#) was passed by the Board of Trustees, after being developed through extensive consultation with marginalized staff, students and community members.

In February 2022 the changes to the gender identity and gender expression guidelines were mirrored in a new procedure, [PR.696.SCO](#) Fostering Gender Identity, Gender Expression, Sexual Orientation Inclusive Schools.

In March 2022 this procedure was also accompanied by revisions to [PR.539.SCO](#) Requests for Ontario Student Academic Records and Eligibility Forms for English Instruction in Quebec to detail how to update gender markers in student academic records and guide the issuance of academic records in a student's chosen name.

In March 2022 the OCDSB issued [PR.700.HR](#) Equitable Recruitment and Hiring Procedure which included equitable practices and embedded transparency and accountability mechanisms to identify any disproportionalities in its application.

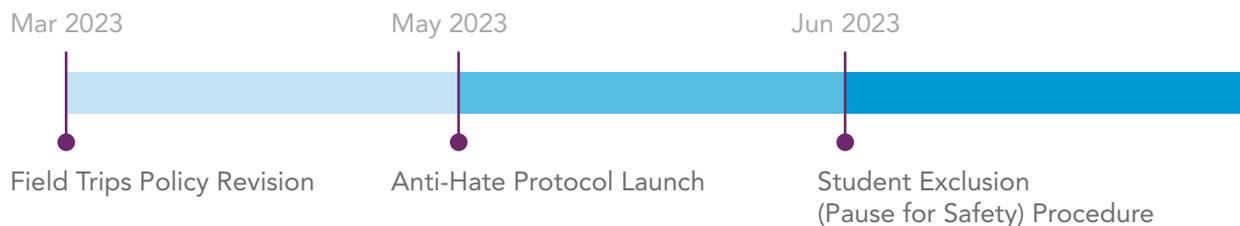
In March 2022 the OCDSB also issued [PR.701.HR](#) Working from Home (Remote Work). This procedure was developed ensuring that accommodation on the basis of human rights protected grounds was also considered. This procedure was revised in November 2022.



In April 2022 the OCDSB Policy [P.032.SCO](#) Safe Schools (Managing Student Behaviour) and OCDSB Policy [P.125.SCO](#) School District Code of Conduct were revised to embed a children rights-centred approach and anti-racist approach.

In May 2022 the OCDSB Procedure [PR.628.SCO](#) Student Dress Code was revised to be more inclusive and remove barriers that resulted in disproportionate enforcement against racialized students.

In June 2022 the Board of Trustees passed its first policy governing exclusions of students from the classroom, [P.144.SCO](#) Pause for Safety (Student Exclusions). The new policy built in accountability measurements and mandatory annual reporting to the Board of Trustees, in a way that identifies any bias or discrimination in application of the policy on students.



In March 2023, the OCDSB Policy [P.029.SCO](#) Field Trips, was revised. Revisions included embedding concepts of equitable access to field trips for all students.

In May 2023 the OCDSB launched an anti-hate protocol to support senior team members, administrators, employees, and students to respond sensitively and appropriately to hate-related incidents when they occur.

In June 2023, OCDSB Procedure [PR.695.SCO](#) Student Exclusion (Pause for Safety) was issued. Protections were built into the procedure to ameliorate disproportionate impacts on students with disabilities, emphasize the duty to accommodate students with disabilities, build in alternative ways to access the right to education during the period of exclusion, and reduce the amount of time that a student is excluded from the classroom or school.

Supporting the Resolution of Human Rights Complaints

Human Rights Concerns and Complaints

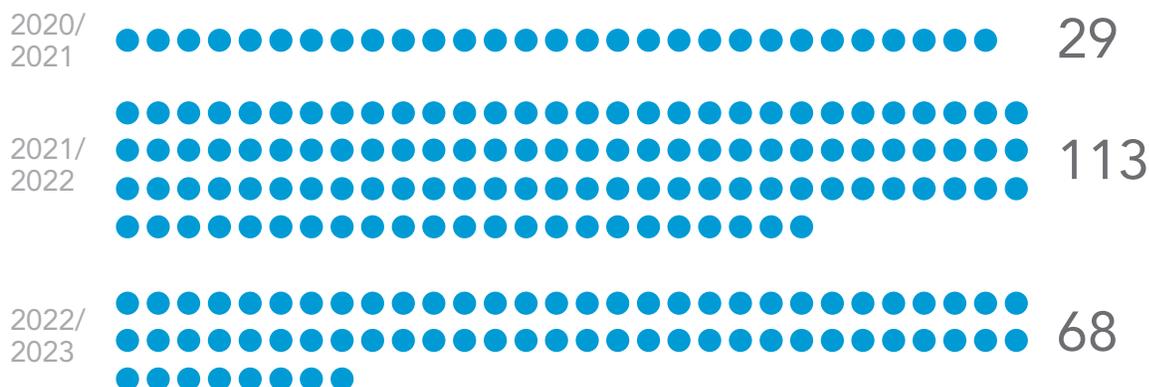
During the reporting period, the O-HREA provided support to the resolution of human rights concerns impacting on students, families and staff members. Concerns are reported to the O-HREA in a number of ways. Concerns can be reported to the O-HREA using an online [reporting form](#) available on the O-HREA [webpage](#), by email directly to a member of the O-HREA office, by email to the O-HREA general email address, by calling the O-HREA office, or by referral from another employee within the OCDSB, such as a superintendent, principal or educator.

If the concern raised to the O-HREA involves complex human rights issues, or if the claimant has already exhausted other mechanisms available to them, the O-HREA, at its discretion, will take on the case for investigation if the allegations meet the threshold for a *prima facie* case of discrimination.

However, not all concerns reported to the O-HREA are investigated by the O-HREA. When a concern is reported to the O-HREA, the O-HREA determines whether the concern is human rights related. If it is not human rights related, the concern is referred to the appropriate superintendent for resolution. If the concern is human rights related, the O-HREA determines whether the concern can be more appropriately addressed by another department within the OCDSB, such as a principal, manager, or superintendent. The O-HREA may also determine that the concern should be addressed by the Labour Relations department, which oversees most investigations into staff misconduct towards students and respectful workplace issues between employees. If it is determined that the concern will be more appropriately addressed by another department, the O-HREA will make the referral. If this occurs, the O-HREA may still provide advice on how to effectively investigate or resolve the matter.

The following graphics summarize the total number of concerns reported to the O-HREA and provide a breakdown of the types of concerns that were reported, based on characteristics protected from discrimination.

Total Number of Concerns Reported to the O-HREA



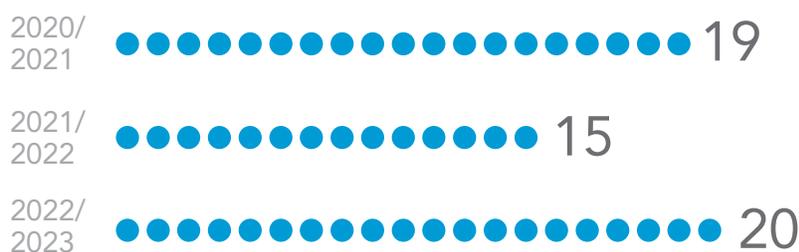
Breakdown of type of human rights concerns reported to the O-HREA*

School year	Ancestry related	Creed related	Disability related	Gender Identity related	Race related	Sexual Orientation related	Sex related
2020/2021	0	0	8	0	12	4	0
2021/2022	4	19	29	6	29	2	7
2022/2023	2	11	13	5	14	6	5

***Note:** Some of the incidents reported related to discrimination experienced on multiple protected grounds. Other concerns reported to the O-HREA were not related to a human rights ground protected from discrimination. This is why the totals may not match the total number of concerns reported to the O-HREA.

During the reporting period, the O-HREA initiated the following number of investigations. Some of these investigations were concluded through formal meetings, involving the union, the superintendent and/or Labour Relations. Some of these investigations also resulted in written findings and recommendations.

Total Number of Investigations by the O-HREA



The Office of the Human Rights and Equity Advisor was established to build and maintain a culture of respect for human rights within the OCDSB and to also create a place where students, families, staff, and community members can go to have human rights concerns addressed. Since its establishment, the O-HREA has been accessed predominantly by staff members. This may indicate a need to increase outreach to students and families to help them understand their rights and where to go for support if they experience discrimination.

Identity of Claimant

School year	Staff Member	Student	Parent	Community Member
2020/2021	12	3	10	1
2021/2022	58	10	31 ¹	9
2022/2023	33	2	24	7

Decisions of the Human Rights Tribunal of Ontario Involving OCDSB

The existence of the O-HREA at the OCDSB in no way prevents an individual from making an application to the Human Rights Tribunal Ontario (HRTO). However, one anticipated benefit of having an arm’s length human rights office with expertise, is to provide a mechanism within the OCDSB to address human rights concerns and before they escalate to the HRTO. During the reporting period, 7 decisions were made by the HRTO regarding the OCDSB.

1. In March 2020, the HRTO made an interim decision² to defer its consideration of the Application pending the conclusion of the arbitration proceeding for grievances filed about the same issues. The application alleging discrimination because of association with a person identified by a Code-protected ground contrary to the *Human Rights Code*. Specifically, the applicant alleged that the respondent disciplined him and terminated his employment because of his association with a student in what he describes as a “non-custodial caregiver” relationship.
2. In August 2021 the HRTO dismissed an application³ as untimely and, therefore, outside the Tribunal’s jurisdiction. The applicant alleged discrimination with respect to employment due to race, colour, place of origin, and ethnic origin contrary to the *Human Rights Code*. Specifically, the applicant claimed that the respondent discriminated against them by not paying them as much as teachers due to the support staff classification for their position. In their Application, the applicant states that the last incident of discrimination took place on June 30, 2016. The Application was filed on November 13, 2020.

¹ 30 identified discrimination against their child as the concern. 1 identified discrimination against themselves as the concern.

² White v. Ottawa Carleton District School Board, 2020 HRTO 224 (CanLII), <<https://canlii.ca/t/j6113>>, retrieved on 2024-01-04

³ Suleiman v. Ottawa-Carleton District School Board, 2021 HRTO 682 (CanLII), <<https://canlii.ca/t/jsbpc>>, retrieved on 2024-01-04

3. In February 2022, the HRTO issued a decision⁴ on an application alleging that the respondent breached the applicant's rights under the *Human Rights Code* with respect to educational services, because of creed and ancestry. The applicant's educational environment was poisoned by the threats, assaults, and discriminatory conduct of another student, including conduct that was antisemitic in nature. Although the applicant is not Jewish, he was personally targeted and the antisemitism was a factor in poisoning his educational environment. The HRTO awarded damages to the applicant in the amount of \$4,500 for the injury to dignity, feelings, and self-respect that the applicant experienced because of the respondent's decision to return the other student to school without fully assessing the impact on him.
4. In August 2022, the HRTO issued a decision⁵ on an application alleging discrimination with respect to educational services, because of sex and gender identity, contrary to the *Human Rights Code*. The application raised concerns about the school board's policies relating to gender issues, specifically citing the statement from the classroom teacher that the school board's policy is "gender fluidity" and that, in the applicant's opinion, resulted in instruction that devalued, denied and undermined the female gender identity. The Adjudicator found that the applicant did not experience discrimination arising from the alleged differential treatment by the respondent.
5. In November 2022 the HRTO issued a decision⁶ dismissing an application as abandoned when additional information was not provided as requested. The application alleged discrimination in the provision of educational services on the ground of disability, contrary to the *Human Rights Code*. The applicant alleged that the respondent school board breached the Code by not complying with Section 31 of Ontario Regulation 298/90 under the Education Act, R.S.O. 1990, c. E.2. The applicant alleged that, while this section of the Regulation sets out the maximum number of identified exceptional students who can be placed in an exceptionality-specific self-contained class, the respondent school board allows the enrolment in such classes to exceed the specified number of students.
6. In March 2023 the HRTO dismissed⁷ an application as abandoned, after the applicant failed to respond to a notice that it would be dismissed because it appeared to be outside the jurisdiction of the Tribunal.
7. In August 2023, the HRTO dismissed⁸ an application as abandoned, after the applicant failed to respond to a notice that it would be dismissed because it appeared to be outside the jurisdiction of the Tribunal.

⁴ Armitage v. Ottawa Carleton District School Board, 2022 HRTO 252 (CanLII), <<https://canlii.ca/t/jms09>>, retrieved on 2024-01-04

⁵ N.B v. Ottawa-Carleton District School Board, 2022 HRTO 1044 (CanLII), <<https://canlii.ca/t/jrnlk>>, retrieved on 2024-01-04

⁶ Greenall v. Ottawa-Carleton District School Board, 2022 HRTO 1301 (CanLII), <<https://canlii.ca/t/jsskp>>, retrieved on 2024-01-04

⁷ See Li v. Ottawa-Carleton District School Board (OCDSB), 2023 HRTO 399 (CanLII), <<https://canlii.ca/t/jwbdv>>, retrieved on 2024-01-04

⁸ See M.K. v. Ottawa Carleton District School Board, 2023 HRTO 1311 (CanLII), <<https://canlii.ca/t/jzvmv>>, retrieved on 2024-01-04

Systemic Reviews and Recommendations

Through engaging in system-level reviews, providing system-level advice, as well as overseeing the investigation of human rights-based concerns, the O-HREA is able to identify barriers contributing to systemic discrimination and make recommendations to remove these barriers.

Generally, these recommendations are made verbally, as part of the O-HREA's advisory role at weekly senior level meetings including the Director's Executive Council through one-on-one meetings, through participation in working groups or by providing written feedback on proposed revisions to policies, procedures, memos, or guidance documents. However, when the recommendations arise as part of a formal review or investigation, the recommendations are made in writing.

When the O-HREA concludes an investigation, both individual and/or system level recommendations to address and prevent discrimination are provided in the report. The system level recommendations are provided to the Director of Education. The Director then tasks appropriate staff to review and assess the recommendations, determine a plan of action to address any discrimination identified, and determine whether and how system-level recommendations might be addressed. This work is done in partnership with the HREA, legal counsel, members of Senior Staff, federation/union partners, and other appropriate individuals.

If the Director or designate determines not to implement a recommendation, the responsibility remains to ensure that any discrimination identified by the report, is adequately addressed.

During the reporting period, the O-HREA made a number of written, system-level recommendations. The following summarizes systemic discrimination and equity concerns identified, and recommendations made to address the issue. As this report covers a three year period, some progress has been made on actioning some of these recommendations fully or partially.

SYSTEM ISSUE 1:

Inadequate resourcing to support deaf and hard of hearing students

The OCDSB has two specialized program classes supporting deaf and hard of hearing students, and has a number of deaf and hard of hearing (DHH) students integrated into classrooms throughout the District. The *Education Act* requires that specialized program classes for deaf and hard of hearing students be taught by an educator with specialist qualifications to teach deaf and hard of hearing students.

Additionally, deaf and hard of hearing students often require accommodation in the form of American Sign Language (ASL) interpreters in order for them to be able to fully participate in the classroom. Currently, the OCDSB uses educational assistants, with ASL qualifications to fulfill this role.

The OCDSB has been unable to successfully recruit and retain teachers with specialist qualifications to teach deaf and hard of hearing children. The OCDSB has also been unable to successfully recruit and retain American Sign Language interpreters with a sufficient level

of ASL to provide the necessary support for deaf and hard of hearing students to access their education.

Parents and guardians are unable to effectively navigate the OCDSB system and advocate for adequate support for their deaf and hard of hearing children, because the organizational structure of the OCDSB Learning Support Services department is not clear.

This is a systemic problem. In 2020/2021 the O-HREA made system level recommendations for consideration to help address these issues. In 2021/2022, the O-HREA noted in its annual report that the inability to adequately staff the positions continued and highlighted that this may be due, in part, to the fact that the OCDSB pays DHH interpreters the same as Educational Assistants (EAs), rather than paying the market rate for ASL interpreters.

1.1 Organizational structure: Develop and publish an organizational structure for LSS, outlining roles and responsibilities.

1.2 Targeted recruitment: Implement a proactive, long term recruitment strategy, actively seeking candidates within the deaf community and related institutions to identify and recruit educators and interpreters with the required qualifications.

1.3 ASL proficiency guideline: Develop a guideline for assessing ASL proficiency, ensuring consistency in evaluation for DHH teachers and interpreters, ensuring a minimum standard to support DHH students.

1.4 Resource dedication: Subsidize the cost of educators to obtain their specialist qualification to teach deaf and hard of hearing students.

1.5 Mandatory acceptance policy: Develop a policy requiring teachers and EAs with DHH qualifications to accept positions in specialized classes or support DHH students when required.

1.6 Market rate salary: Revise the job classification of staff who provide ASL interpretation services to students, from educational assistant to interpreter. Provide market rate salary for ASL interpreters.

SYSTEM ISSUE 2:

Separation of children with disabilities and behaviour challenges into specialized program classes and English Language Developers into congregated classes

The separation of children with disabilities or with behaviour challenges into specialized program classes is exclusionary and goes against human rights-based principles of full participation and inclusion. The OCDSB also has a practice of congregating students who are developing the English language (English Language Developers) into classes and at schools outside of their community school.

The OCDSB currently has approximately 143 specialized program classes at the elementary level and 623 sections, which is the equivalent of approximately 78 specialized program classes. The OCDSB also has two schools that exclusively serve students with disabilities. The placement of children in specialized classes or schools segregates them into classrooms based

on disability, behaviour, and/or language ability, away from other students. It also results in students being bused to schools outside their neighbourhood. This negatively impacts on the students' ability to develop social networks in the area where they live.

2.1 Integrate children with disabilities: Revise OCDSB use of specialized program classes, to prioritize full integration of children with disabilities into regular classrooms in their community school, with adequate accommodations to allow for full participation.

2.2 Community school-based language support: Provide English language development support at each community school.

SYSTEM ISSUE 3:

Inadequate identification of and response to sexual and gender-based harassment

Several investigations involving sexual and gender-based harassment were undertaken by the O-HREA. In the course of these investigations, it became apparent that adequate steps were not taken to identify sexual and gender-based harassment, and respond to sexual and gender-based harassment when it was reported by students and staff. This led to sexual and gender-based harassment persisting over time.

3.1 Increase awareness: Conduct annual awareness campaigns during the opening assembly for students in grades 7 to 12 on behaviour expectations and how to identify sexual and gender-based harassment and how to report harassment concerns.

3.2 Train staff to respond: Provide training sessions for staff to enhance their ability to identify, report, and address sexual and gender-based harassment. This includes the distribution of visible posters across the District.

3.3 Victim-centred response: Create written guidelines for a tiered, victim-centred approach for handling allegations of sexual and gender-based harassment and sexual assault. These guidelines should be accessible by students and staff District-wide, emphasizing consistent dialogue with the victim as a crucial requirement.

3.4 Centralized information repository: Develop a dedicated folder in the internal safe schools portal on sexual and gender-based harassment and sexual assault. This repository will contain pertinent information and training materials from the Sexual Assault Support Centre (SASC), ensuring accessibility and guidance for addressing and preventing sexual assault and harassment.

SYSTEM ISSUE 4:

Lack of survivor-centred support to children who are victims of sexual and gender-based violence

Consultations with the OCDSB community, as well as a review that looked at OCDSB practice when responding to incidents of sexual and gender-based violence at school highlighted gaps in response that impacted negatively on the victims. While the OCDSB is required to contact

the police when these incidents occur, there are steps that can be taken to ensure that the approach is trauma informed and survivor-centred.

4.1 Survivor and child rights-centred approach: Take a [child rights, survivor-centred approach](#) when supporting victims of sexual and gender-based violence:

- (a) seek informed consent from the child prior to contacting the police;
- (b) seek parent/guardian consent prior to having the police speak to their child. Ensure the parent/guardian or a trusted adult is with the child as their advocate throughout the process;
- (c) offer and provide culturally relevant support and accompaniment for the child. This could be offered through existing staffing or through community partnerships;
- (d) advise the child and their parent/guardian of the option to request a police officer of their preferred gender, prior to contacting the police.

SYSTEM ISSUE 5:

Systemic racism, discrimination, and bias in disciplinary practices

The impacts of [systemic racism, systemic discrimination, and bias](#) are evident in disciplinary processes. The disparities revealed in the recent OCDSB [suspension reports](#) are indicative of systemic discrimination, and have been reinforced by observations of the O-HREA in the course of human rights-based investigations and reviews. Mitigating and other circumstances are factors that administrators are legally required to consider when determining the appropriate response to a student breach of the Code of Conduct. These factors require administrators to consider the impact of systemic racism, systemic bias, and/or any identity-based harassment experienced by the student when assessing the seriousness of the incident and determining the appropriate response.

When a critical incident occurs, the Critical Incident Review Committee (CIRC) meets to recommend an appropriate response, including the disciplinary response. Sometimes CIRC meetings take place prior to the administrator completing the investigation or meeting with the student suspected to have caused the harm. As a result, important information about any mitigating or other circumstances is sometimes missing and not adequately taken into account when recommending the appropriate response or consequence.

5.1 Mitigating and other circumstances: Provide refresher training to administrators on how to incorporate anti-racist practices into the discipline process, including through intentionally considering the impact of systemic racism, systemic bias, and/or any racial or identity-based harassment the student may have experienced as a mitigating factor when determining the appropriate response.

5.2 Unconscious bias and bias-aware discipline: Provide [professional development](#) opportunities for administrators and educators to identify and remove [unconscious bias](#) from the discipline process.

5.3 Investigations must be completed prior to CIRC meeting: Provide guidance to CIRC members that CIRC meetings must only take place after the principal's

investigation is completed and information about any mitigating or other circumstances has been gathered for consideration.

SYSTEM ISSUE 6:

Use of video surveillance not aligned with privacy obligations

Research indicates that racialized people are subject to a disproportionate amount of surveillance in their day to day lives. The security benefits of video surveillance in OCDSB schools and buildings must be balanced against the intrusion on privacy that they represent. The Information and Privacy Commissioner (IPC) of Ontario has issued guidelines on the use of video surveillance in schools and requires an independent risk assessment to be done of each premises before the decision to install video surveillance is made. It further requires visible signs to be posted to advise the public that video surveillance is in use. Finally, it sets out the limited circumstances that footage from the surveillance may be accessed and used.

6.1 Visible signage: Place visible signage at the entrance to all OCDSB buildings where video surveillance is used, to advise the public about the existence of security cameras, in accordance with the IPC recommendations. It should include office contact information for any questions. It must be clearly written and prominently displayed.

6.2: Review internal guidance: Develop internal written guidance on the appropriate use of video surveillance and review it with all administrators. The guidance should clarify that video surveillance may only be accessed in response to concerns about vandalism, or violent or criminal activity and may not be used to monitor students in the hallway.

SYSTEM ISSUE 7:

Lack of clarity about search and seizure powers

When determining whether to search a student, their belongings, their desk, their locker, their cell phone, or their email account and files, an administrator must make a determination of whether there are reasonable grounds for the search. There is lack of clarity in OCDSB policies and procedures about what type of policy violation concerns justify a search, the elements of determining whether there are reasonable and/or probable grounds for a search, what type of search is permitted, whether student and/or parent/guardian consent is required, and the elements of informed consent. The power to search must be exercised with restraint.

7.1 Provide students with information about rights and responsibilities: Develop and distribute information to grade 7 to 12 students and parents about search and seizure rights and responsibilities, voluntariness, and informed consent.

7.2 Revise search and seizure procedure: Revise procedure to include the threshold for searching student email and GEM accounts and to include the requirement of informed consent and accountability mechanisms for tracking and reporting each search.

7.3 Review search standards with administrators: Review with administrators privacy, search and seizure powers. Topics covered should include students' privacy protections, how to determine whether there are reasonable grounds for a search, what types of Code of Conduct infringements justify a search, using restraint when determining whether to search and what type of search to conduct, and requirements for voluntariness and informed consent.

SYSTEM ISSUE 8:

Contradictions about approach to vaping and cannabis use

There are inconsistencies between written directions in the safe schools folder about vaping and cannabis use. The guidance in the Safe Schools portal to report all incidents of vaping to the By-Law Officer is contrary to District direction to approach vaping as a public health issue and to take an educative and corrective approach rather than punitive approach to addressing vaping.

Reporting vaping, which is a public health issue, to the By-Law Officer who has the responsibility for by-law enforcement is a similarly harmful approach as reporting non-mandatory breaches of the Code of Conduct to the police. It disproportionately impacts marginalized students. Educative and corrective approaches should be prioritized. This is aligned with OCDSB's progressive discipline approach.

8.1 Educative response to vaping: Revise documentation in the Safe Schools folder on vaping and smoking to emphasize prioritization of an educative response by the administrator, over a punitive response.

8.2 No mandatory notification to By-Law Officers: Remove guidance to report all instances of vaping to By-Law enforcement. Replace it with the direction that any notifications to the By-Law Officer must be approved in advance by the Superintendent and should only be exercised with restraint. Clarify that vaping substances should be returned to the parent/guardian or disposed of by the school.

SYSTEM ISSUE 9:

Negative impacts of police involvement on Indigenous, Black, racialized and marginalized students

Police involvement in OCDSB schools disproportionately impacts on Indigenous, racialized, and 2SLGBTQ+ students, as well as students with disabilities.

This was confirmed in June 2021 after a comprehensive review by the O-HREA. The [report](#) found that the practice of involving police in schools had negative impacts on Indigenous, Black, racialized and marginalized students.

The review found children with disabilities are likely to have disproportionate involvement with the police in school and recommended adjustments to policy and practice so that police response is seen and used as a last resort for children with disabilities. It also found that the practice of using the police to conduct wellness checks on students who are absent from

school, was detrimental to some Indigenous and racialized families. The review noted the negative impact on marginalized students of using the police to respond to breaches of the Code of Conduct such as bullying, fighting or refusing to leave the premises, which does not typically require mandatory involvement of the police.

The review also found that because of the close relationship between administrators and the police, sometimes private information about students and their families is shared with the police, beyond the minimum required under the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA) or the *Personal Health Information Protection Act* (PHIPA).

9.1 End SRO program: End the OCDSB's participation in the Ottawa Police Services, School Resource Officer Program.

9.2 Minimize police involvement: Revise and harmonize all relevant contractual commitments, policies, and procedures to limit police involvement in schools to only incidents that the Provincial Protocol identifies as [necessary involvement](#).

(a) [revise](#) both the Ottawa Protocol and the OCDSB policies and procedures to narrow the definition of what incidents require mandatory notification of the police, in line with the Provincial Protocol. **i.** remove references to involving police to respond to discretionary incidents like mischief, bullying, vandalism, giving alcohol or cannabis to a minor, being under the influence of alcohol or illegal drugs. **ii.** reinforce that notification and/or involvement of police to respond to incidents involving [children under the age of 12](#), is never mandatory. **iii.** clarify while police must be notified of incidents of a mandatory nature involving children with [special education needs](#), a police *response* is not necessary.

(b) stop using police to respond to bullying, refusing to leave the premise, fighting, for [relationship-building](#), for [educational activities](#).

(c) ensure if police do visit a school, they park in a parking spot, and not at the front door, unless it's an emergency. A [visible police presence](#) at a school is stigmatizing for the students and school.

9.3 Monitor police involvement: Introduce accountability and transparency mechanisms to track and monitor all police involvement. Cyclical [monitoring and evaluation](#) of police involvement in schools is required to identify and address any disparities in impact on Indigenous, Black, racialized and marginalized groups.

(a) build a requirement into Ottawa Protocol revisions to engage in a regular, identity-based evaluation of the impact of all forms of police involvement on students.

(b) collect and disaggregate data by Indigeneity, race, sexual and gender identity and disability at a minimum, and engage in participatory and identity-based consultations with students, parents/guardians and community members to assess impact.

(c) develop [checks and balances](#) to limit implicit bias when deciding whether to involve police such as superintendent approval, mandatory data collection, and annual follow up on disproportionality by superintendents with schools.

(d) mandatory, [annual, identity-based, public reporting](#) by the OCDSB on police involvement.

9.4 Human rights-based approach: Embed Indigenous rights, human rights and children's rights and survivor-based practices into decisions and practices for police involvement.

9.5 Identify alternatives to police involvement: Identify a designated staff member or a community partner other than police, to respond to incidents within the OCDSB that do not require mandatory police notification.

(a) make serious efforts to map, identify and develop partnerships with non-police alternatives and culturally relevant service providers.

(b) stop the practice of using police to do [wellness checks](#) on students who are absent, to respond to [bullying, fighting and/or refusing to leave the premises](#), or as part of the [progressive discipline](#) process to talk to students about the consequences of their actions.

(c) use alternatives to police involvement when responding to [incidents involving children with disabilities](#). Provide additional training to staff, clarify "hands on" or "hands off" policies, and reconsider the inclusion of a police response in safety plans and seek alternatives instead.

9.6 Limit sharing of private information: Private information shared about a student and their family with the police should be limited to the information *required* under MFIPPA, PHIPA or other legislation.

(a) limit police involvement in [Violent Threat Risk Assessment \(VTRA\)](#) meetings to incidents that require mandatory police notification under the Provincial Protocol and limit information shared with police to only that information that is required to ensure safety.

(b) inform students in writing what private information is shared and with whom it was shared (MFIPPA requirement).

(c) brief everyone participating in the VTRA on the parameters around sharing of private information, prior to the meeting.

(d) stop sharing student [index card](#) with the police as it contains more private information than what is required.

(e) limit [identification of students in photos](#) provided by the police to situations where not identifying the person may result in serious or imminent harm to another person.

(f) provide professional development to administrators on the difference between what information sharing is *permitted* under law and what information sharing is *required* and guidance on how to use their discretion to decide when and what to disclose.

9.7 Informed consent and parent/guardian support: Prior to permitting a police officer to interview a student, the administrator should check whether the student has provided [informed consent](#) and the parent/guardian has also provided informed consent.

(a) Interviews should not proceed until the parent/guardian is present, subject to exigent circumstances where there is an imminent threat to safety.

(b) develop training and written guidelines on OCDSB's expectations around parent/guardian consent, information sharing, search and seizure, considerations prior to making a call for service, accountability, and identifying alternatives to police involvement including identifying other service providers.

(c) provide annual training to students and families on their rights and responsibilities, children's rights when they are in conflict with the law, how and where to raise a concern, and how to contact a community advocate for support if needed.

SYSTEM ISSUE 10:

Verbalization of racial slurs by staff members and students

Incidents reported over time indicated there was a problem with some educators verbalizing racial slurs when teaching in classrooms.

This trend was noted in the 2020/2021 school year and highlighted the need for system-wide clarification on OCDSB expectations in relation to the use of slurs and epithets. The issue also raised the question of how to appropriately address the use of racial slurs by racialized students, in the context of 'reclaiming'.

10.1 Direction on slurs: Issue system-wide guidance to clarify the OCDSB's prohibition on the verbalization of racial slurs in the classroom, including when quoting curriculum resources.

SYSTEM ISSUE 11:

Inconsistent response to hate-related incidents

Support to schools and supervisors when they navigate human rights concerns, and various investigations of human rights concerns by the O-HREA on different protected grounds, demonstrated that there was a gap in understanding and confidence about how to appropriately and consistently address discriminatory conduct and hate-related incidents. This meant that at times, human rights concerns were not adequately addressed.

11.1 Develop guidelines: Develop guidelines for staff and students on how to appropriately address bias, discrimination, and identity specific hate-related incidents, ensure procedural fairness, and check personal bias.

11.2 Report back to staff members: Revise [PR.515.SCO](#) Student Suspensions and Expulsions to reflect legislative obligation under the *Education Act* to report back to the staff member who reported the incident, about the outcome of the investigation.

SYSTEM ISSUE 12:

Inconsistent approach to religious accommodation

There is a lack of clarity about how to appropriately accommodate religious beliefs and practice including prayer. This leads to students being denied the right to access prayer space at appropriate times, and being asked invasive questions such as why they need to pray at that particular time or to explain how long it takes to pray, etc. It also leads to students and families requesting to be excused from participating in activities related to 2SLGBTQ+ identities, citing their religious beliefs. The lack of clarity also impacts staff members who seek accommodations.

12.1 Religious accommodation procedure: Develop a procedure on religious accommodation for students and for staff.

12.2 Training competing rights: Provide training to Multicultural Liaison Officers (MLOs) as well as administrators and educators on religious accommodation for both staff and students, to ensure consistency in application across the District. Review as well how to consider competing rights.

SYSTEM ISSUE 13:

Lack of central level, identity-based support for Arab students

At the OCDSB, Indigenous, Black, Jewish and 2SLGBTQ+ identity-specific supports are available for students. Data suggests that approximately 14.7% of the student population identify as Middle Eastern and 19.3% identify as Muslim. This is a gap and means that there is not adequate support to prevent and address anti-Arab racism and Islamophobia when it occurs.

13.1 Arab student support role: Establish a central level identity-based position focused on community engagement, support for Arab and Arabic speaking students and families, and advocacy and support to schools and the District on issues related to Islamophobia and anti-Arab discrimination.

SYSTEM ISSUE 14:

Mentoring, appointment and handover process for administrators

Currently placement of an administrator at a school is determined in large part by a process whereby administrators are asked where they would like to work. This means that schools with more complex needs have fewer administrators putting their name forward. Additionally, administrators tend to be assigned within the same superintendency, rather than placed anywhere in the District, based on need. While the O-HREA recognizes that it is important for employee wellness to listen to and consider employee preferences, this must be balanced with

the obligation to ensure that staff members placed in particular locations have the skill-set needed to meet the unique needs of the school population.

14.1 Adjust appointment process for administrators: Determine the skill set needed to effectively lead and serve the population at a particular school, and then appoint administrators who have that unique skill set.

14.2 Introduce handover period: Introduce a handover period where outgoing and incoming principals overlap at a school for a period of time, to ensure smooth transitions in leadership.

14.3 Review mentoring program: Review the mentoring program for new principals. The review should ask new and existing principals and vice principals what is needed to make the program most effective and make changes accordingly.

SYSTEM ISSUE 15:

Single track, dual track, and multi-track language programs at different schools contribute to inequitable streaming of students

Maintaining some schools as a single track, English with a core French program, is perpetuating *de facto* streaming and reinforcing inequities between schools and students. A shift is needed in order to provide a balance amongst socio-economic communities in the area.

15.1 Standardize programs: Standardize programs offered at all schools to include both single track and dual or multi-track French immersion programs to reduce inequities.

SYSTEM ISSUE 16:

Process for determining resourcing results in under-resourced schools

Staffing and resourcing for a school is determined largely by the school enrolment. Being higher on the RAISE index may result in some additional resourcing being allocated, but enrolment and the RAISE index do not tell a complete picture of the needs of a school. Resources to a school, including the school's discretionary budget, should be increased or decreased equitably based on an informed assessment of a school's particular needs. This practice further perpetuates inequities between schools.

16.1 Equitable resource allocation: An annual assessment of a school's needs should be undertaken to inform the resource allocation each year, including the school's discretionary budget.

SYSTEM ISSUE 17:

Educators in the International and Indigenous Languages Program require guidance on addressing sensitive issues

Educators in the IILP program are often new to the OCDSB and not always familiar with OCDSB policies and procedures. They have also not benefited from ongoing professional development within the OCDSB on equity and human rights, and culturally relevant and responsive pedagogy.

17.1 Revise induction materials: Induction materials for teachers for the International and Indigenous Languages Program (IILP) should be revised to include learning on how to navigate sensitive discussions including about religion, checking and identifying personal biases, creating inclusive spaces for all students and identifying and addressing Islamophobia.

Emerging Human Rights Issues

In addition to the system issues that emerged above as a result of investigations undertaken by the O-HREA, during this reporting period the O-HREA identified and raised several emerging human rights issues within the District. The issues include:

- tension between the International Holocaust Remembrance Alliance's definition of antisemitism and the application of its working examples and the expression of Palestinian identity, anti-Palestinian racism, and discussion of human rights abuses committed in Israel and Palestine;
- tension between religious beliefs and non-discrimination towards members of the 2SLGBTQ+ community including in relation to celebration of Pride month, access to gendered spaces by transgender students, and inclusive learning about 2SLGBTQ+ identities;
- clarification about religious accommodation, including accommodation of religious beliefs and practices that is possible and is not possible, while ensuring the OCDSB upholds its obligation to ensure non-discriminatory learning spaces;
- disability forms for employees are not inclusive of gender diverse people and are not designed to accommodate people with permanent disabilities, including learning differences or people who are neurodivergent;
- current employee benefits packages appear to discriminate against same-sex parents by denying them equal benefits when they build their family through surrogacy;
- strict application of Board by-laws to refuse delegations from people outside the Ottawa area, could inadvertently prevent marginalized groups from accessing important advocacy support that does not exist within the Ottawa area.

Progress and Priorities

During this reporting period, the O-HREA has noted important progress and organizational change within the OCDSB that reinforces a culture of human rights in both the education and employment sphere and addresses some of the systemic discrimination issues noted in the O-HREA recommendations.

Important changes have been made to policies and procedures that set the framework for centering Indigenous rights, human rights, equity, and the best interests of the child in education and employment decisions. It is necessary to accompany these changes with building the capacity of the entire OCDSB community to both understand and be able to implement these principles. The development of the Indigenous, Equity, and Human Rights Roadmap is an important strategic initiative towards achieving and reinforcing this cultural shift and its upcoming renewal will be an opportunity to reinforce these important organizational cultural shifts.

Progress has also been made towards implementing changes to address some of the issues highlighted in the O-HREA systemic recommendations to address the discrimination.

The O-HREA notes the development of a direction prohibiting the use of slurs and accompanying training and tools, and an anti-hate protocol by the OCDSB. The resources supporting the direction on the use of slurs, includes resources on how to engage on sensitive issues as well as resources on how to address the use of slurs in the context of reclaiming by marginalized identity groups. The OCDSB anti-hate protocol provides clear direction to administrators on how to disrupt, educate, support and report incidents of hate. It focuses on limiting the harm to the student harmed. The anti-hate protocol gives extensive guidelines and resources on anti-Indigenous racism, anti-Asian racism, anti-Black racism, antisemitism, Islamophobia, homophobia, transphobia and biphobia. The clarity provided by these tools is supporting educators and administrators to consistently, sensitively and appropriately address discrimination when it arises. The O-HREA has noted promising, positive change emerging from these resources.

An important and notable change was also the end of OCDSB's participation in the Ottawa Police Service's SRO program, the issuance of a direction to schools to limit police responses in schools to matters that require mandatory notification of the police, and the initiation of internal tracking of each time police are called to respond to an incident in schools. However, other related recommendations were either not yet actioned or not fully actioned. It is still necessary to revise OCDSB policies and procedures to mirror the limitations in the Provincial Protocol and to make serious efforts to map, identify and develop partnerships with non-police alternatives and culturally relevant service providers. It is also necessary to not just record when police are contacted in schools, but to collect sufficient information to be able to disaggregate this reporting by identity-specific characteristics and to use the data to identify disparities in responses. Without these types of changes, systemic discrimination will persist.

The O-HREA recognizes that there will be times where working with or calling the police for a response will be necessary. Moving forward, as the partnership between OCDSB, Ottawa Police Services, and the community they both serve is reimaged, it is incumbent to engage in human-rights and identity-based, participatory, discussions with students, parents and guardians and community members to collectively determine the way forward, assess any windows of opportunity for engagement and build in transparent accountability mechanisms to be continually identifying and assessing impact.

OCDSB's priorities moving forward should be to consolidate the gains made toward realizing human rights-based organizational change.

As a new office, the O-HREA recognizes that there is room to improve identity-based data collection and analysis for human rights complaints and provide clarity about how the office operates. Priorities moving forward include the finalization of a procedure to guide the investigation and resolution of human rights concerns and the establishment of a robust system for tracking and reporting on human rights-related issues across the District. This will increase the OCDSB's ability to target resources more effectively to remove barriers that are causing discrimination.

Demands on the O-HREA continue to increase, as more OCDSB members become aware of the services that it offers. The limited resources of the office are already strained and consideration should be given to increasing resourcing to allow for demands to be adequately met and increasing the capacity of others within the OCDSB system to have a deeper understanding of how to appropriately address human rights discrimination.



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