

# Diversity Audit: Ottawa Public Health's Anti-Racism and Anti-Oppression Policy



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## How to Read this Audit

This Audit is written keeping two audiences in mind, those that will lead diversity, equity, and inclusion (DEI) at Ottawa Public Health (OPH) and those who will develop the strategies and implementation plans to realize OPH's DEI vision for the future.

This document, the audit, summarizes Strat-ology's evaluation of OPH's Anti-Racism / Anti-Oppression Policy from an equity lens, a review of 19 documents from the City of Ottawa and OPH that help put OPH's Anti-Racism / Anti-Oppression Policy in context (see Appendix A), and 25 conversations with leaders, program managers, and racialized staff across the organization, including partner agencies.

The Executive Summary on Pages 5 to 11 targets leaders who want a strategic perspective on the DEI challenges facing OPH, potential solutions, and actionable change plans. The Executive Summary intends to demonstrate at a high level how OPH can improve its Anti-Racism / Anti-Oppression Policy and ensure its successful implementation.

The comprehensive audit on Pages 12 to 47 details how the OPH's Anti-Racism / Anti-Oppression Policy can be improved and makes specific recommendations around implementation. All recommendations are bolded, allowing readers to identify them quickly when perusing the report.

## Executive Summary

Strat-ology Consulting's audit of DEI at OPH was intended to determine the following: (1) Is racism and discrimination today at OPH well-addressed in OPH's Anti-Racism Policy and resulting Strategies and Action Plans? (2) What are the gaps? (3) Are the current DEI challenges OPH faces in governance, HR practices, service delivery, and community engagement reflected in the Anti-Racism Policy, Strategies and Action Plans? (4) What actionable changes does Strat-ology recommend to leadership, staff, structures, processes, and measurement to improve DEI at OPH?

In all of Strat-ology's work at OPH, what is clear is a culture that is very interested and engaged in improving DEI at OPH. First, the intent to learn and grow is apparent in every conversation Strat-ology had at OPH. Second, DEI is deemed relevant and important. Third, there is an appetite to learn and change at all staff and management levels. Finally, a commitment to public health binds OPH leaders and staff along with a shared belief that DEI is foundational to health equity. This represents an enabling context for change, and although the intent of this audit is to conduct a critical evaluation of OPH's Anti-Racism / Anti-Oppression Policy, the enabling context represents a positive canvas for change.

The Executive Summary begins by answering the following question:

1. What is the current state of DEI at OPH?

This understanding is built based on 25 interviews across OPH, a review of the 19 documents associated with DEI provided to Strat-ology by OPH, and an understanding of DEI best practices.

The Executive Summary goes on to answer the following questions:

2. What strategic shift needs to take place in how OPH thinks about operationalizing its Anti-Racism / Anti-Oppression Policy?
3. What key themes need to be highlighted in OPH's Anti-Racism / Anti-Oppression Policy to give way to the appropriate set of actionable strategies?
4. What actionable strategies does Strat-ology recommend to help OPH operationalize its Anti-Racism / Anti-Oppression Policy?

### What is the current state of DEI at OPH?

The word that captures the state of DEI at OPH is "divided." Interviews with members of the Senior Leadership Team (SLT) and the Board of Health (BOH), HR Managers, and Managers and Staff Members from across OPH, many of whom were from equity deserving groups (EDGs), revealed areas of convergence and divergence.

## SLT and BOH Perspective on DEI

There is a realization among members of the SLT that OPH, like most public health departments across Canada, has work to do to create health equity. There is also a clear acknowledgement that the lack of diversity in the SLT and the BOH means members may not have the lived experience necessary to categorically determine if the Anti-Racism / Anti-Oppression Policy, in its current form, will allow OPH to be more diverse, equitable and inclusive. Regardless of the Audit's findings, there is a clear realization that achieving health equity, a foundational standard at OPH, requires representation. The definition of representation needs to be forward-thinking and not based on some minimum standard. It follows that SLT and BOH members understand the value of a workforce at all levels of OPH, reflecting the diversity of the population the organization serves. There is a belief among senior leaders at OPH that the organizational culture supports diversity. They believe leaders at all levels of OPH understand the value brought to the organization when diverse voices are included and represented, and the culture at OPH does not pose a limit on diversity. However, senior leaders at OPH are savvy enough to acknowledge that there are teams at OPH where this culture is not well reflected and thus not well operationalized. There is also an underlying belief that more needs to be done at OPH to reflect its commitment to DEI.

## Human Resource Perspective on DEI

Those working for HR or who have been closely involved with hiring would suggest that the Pandemic was pivotal in forcing a change in systems that seemed to discriminate against members of EDGs. The demand for staff in racialized communities who understood the communities' operations and needs was so great that it forced a change in hiring practices while relaxing some policies and processes that were not essential to quality hiring but that may have served as a barrier to racialized applicants. This change was important and has gone a long way in helping OPH be a more representative organization where it counts, i.e., on the front lines. Those working for HR or who have been closely involved with hiring believe that diversity in management also matters. But that will come in time, as diverse talent bubbles up to the top of the organization. Most of these individuals, who were not from EDGs, suggested that although they have heard of issues of discrimination and oppression, they rarely get formally reported or investigated. Most believed this was an indication that the state of DEI at OPH is positive and improving at a strong pace.

## Racialized Managers' and Staff's Perspective on DEI

When it comes to DEI, members from EDGs acknowledge that OPH, in the last 2 years, has improved staff diversity in some areas of the organization. Most attribute this improvement to the pressures placed on OPH during the Pandemic. Many are concerned that as pandemic-related funding comes to an end, OPH will contract the number of employees at the organization and return to a less diverse workforce. Interviewees also assert that despite the DEI gains made during the Pandemic, there is work to be done to ensure (1) OPH leadership and staff represent the populations they serve, (2)

opportunities for professional development are equitable, and (3) the treatment of newly promoted managers from EDGs is authentically inclusive. Interviewees from EDGs shared many DEI-related stories. Those who worked in diverse work contexts where supervisors had diversity-related lived experience felt they were encouraged to contribute and given career growth opportunities. Many who worked in contexts with limited diversity felt the barriers they experienced when trying to build a career at OPH are substantive. However, some interviewees felt these barriers would come down over the next few years, but they acknowledge their existence and the obstacles they place to career and personal growth. All interviewees from EDGs felt that career progression at OPH for them, regardless of qualifications or performance reviews, was slower and more challenging than it was for employees from non-EDGs. Interviewees from EDGs shared the following when asked about the state of DEI at OPH:

- Leadership at OPH acknowledges the importance of DEI to health equity but struggles to develop actionable roadmaps for change.
- Although members of the SLT have signalled that we need to do a better job of finding and choosing diverse talent for roles such as program managers, the signal is not well-translated into action.
- Microaggressions regularly occur at OPH, but they are subtle. The term microaggression is not preferred among racialized staff. Although the aggression is subtle and often made in passing, the impact is long-lasting and significant. When microaggressions are reported to supervisors and managers, there is a reticence to engage and formalize complaints. When members of EDGs (or any members of staff) report microaggressions, managers prefer to offer alternative explanations or counsel those experiencing the discrimination to be more patient or suggest action will be taken if the incident repeats. Members of EDGs feel this reticence is driven by a dearth of DEI-related lived experience among managers at OPH, an inability to understand the gravity of racially charged incidents, and an unwillingness to believe DEI is a priority giving it only cursory managerial attention.
- Reporting microaggressions carries a significant career risk of being labelled as someone difficult and unable to work well with others. This limits what OPH knows about the state of DEI in the organization.
- Members of EDGs are regularly overlooked and experience being left behind when it comes to career progression. There is a tendency at OPH to promote sameness which means fewer leadership opportunities for members of EDGs and longer than average timeframes to transition from temporary to permanent staff positions, both contributing to the creation of a second-class citizenry.
- Members of EDGs believe that if one cannot find a way to become a part of the manager's social network, being considered for promotions becomes very challenging. Decisions related to advancement at OPH are not always merit-based and are often grounded in bias.
- DEI at OPH is framed as a matter of individual action and responsibility. There is a pervasive belief that efforts to educate leaders on biases will result in change. As a result, there is limited effort to create processes, systems, and accountability frameworks that will drive DEI regardless of individual level buy-in.
- Members of EDGs felt that given that diversity is almost non-existent in the SLT and the BOH, it is hard for employees from EDGs to see themselves in leadership, making OPH a less than ideal career

choice. In addition, some members of EDGs shared that OPH, pre-pandemic, had a reputation of being an organization where racialized staff are not hired with great frequency.

The interview findings presented above point to areas of convergence in terms of how employees from all levels think about the state of DEI at OPH. However, what is also clear is an overarching divergence. For example, senior leaders believe in and support an agenda for increasing levels of DEI at OPH and acknowledge blind spots. However, these beliefs have been slow to turn into detailed strategies and action plans. On the other hand, hiring managers are more positive and feel diversity, equity, and inclusion have improved significantly. Do they see the barriers to members of EDGs face in the recruitment, retention, and advancement processes? Moreover, employees from EDGs believe there is much work that remains to turn the dial in terms of DEI at OPH, and they share a multiplicity of DEI-related challenges that they have personally experienced. What is required at OPH is a strategic shift in its approach to DEI that is less focused on individual action and more focused on the co-design of roadmaps to change.

### What strategic shift needs to take place in how OPH thinks about operationalizing its Anti-Racism / Anti-Oppression Policy?

In its current form, the majority of action plans that are meant to operationalize OPH's Anti-Racism / Anti-Oppression Policy are informational, including (1) various training and awareness initiatives, (2) getting feedback on different hiring and promotion practices at OPH, (3) sociodemographic data collection efforts, and (4) information gathering from community engagement groups and efforts. Awareness of DEI-related issues and challenges is an important outcome of these action plans. They also help form intent. However, when most of an organization's DEI action plans are about building awareness, there is an assumption that individual action is key to driving DEI. The challenge with this approach to DEI is that individual action is difficult to mandate and even more difficult to hold to account, making change precarious. Change at OPH related to DEI will only occur through the institutionalization of structures that will drive DEI (e.g., a dedicated DEI leader and team, an accountability framework, a DEI Board, etc.) and the redesign of existing processes that are perpetuating the existence of DEI blind spots and a history of systemic discrimination and oppression (e.g., processes related to DEI reporting, training-design, recruitment, retention, and advancement etc.). Although Strat-ology makes a few recommendations around training and data collection, the bulk of the recommendations to OPH revolve around making key structural and process-related changes.

### What key themes need to be highlighted in OPH's Anti-Racism / Anti-Oppression Policy to give way to the appropriate set of actionable strategies?

Based on Strat-ology's Audit, including a review of 19 documents (see Appendix A) and 25 conversations with leaders and staff across the organization, Strat-ology recommends the following principles underpin OPH's Anti-Racism / Anti-Oppression Policy.



## Community Engagement

- The most valuable strategies that will shape OPH's future must include input from diverse voices within the community. These voices should include community leaders but focus on community members. In addition, they should include diverse and representative community partners, including those from civil society and the public and private sectors.

## Systems & Processes

- Collecting qualitative and quantitative data both inside the organization and from the communities OPH serves is key to understanding the state of DEI at OPH.
- OPH is committed to confronting and eliminating discriminatory and racist incidents and behaviours within the organization and in its work with the community. To accomplish this, OPH will build systems that support safe incident reporting, information sharing, and accountability while fully recognizing that racism and oppression in 2022 are largely subtle.
- OPH acknowledges the existence of systemic discrimination not only at the organization level but also among job categories, levels of seniority, and in internal and external service delivery teams. These systems pose barriers to recruiting and promoting members from EDGs. OPH is committed to identifying barriers to fair employment and promotion and designing policies that effectively promote diversity, equity and inclusion in the workplace.

## Leadership & Culture

- Achieving health equity is inextricably linked with achieving the goals, strategies, and action plans that form OPH's Anti-Racism / Anti-Oppression Policy. Although the successful implementation of OPH's Anti-Racism / Anti-Oppression Policy involves employees and partners across the organization, accountability falls squarely on the shoulders of OPH's Senior Leadership Team.
- An OPH enabled to improve diversity, equity and inclusion is one whose leaders feel empowered, capable, and comfortable confronting discrimination at the individual, team and organizational levels by building roadmaps for change.
- OPH commits to a culture of openness and transparency when hiring, promoting, and retaining staff and leadership.

## Staffing

- OPH is committed to building a corporate culture that is welcoming and inclusive.
- A forward-looking OPH is one where there is a strong correlation between the levels of diversity in the community, OPH's staff, and its leadership. Reflecting and representing diversity means setting

representation goals that are forward-looking vs. designed to meet minimum standards. Authentic representation is measured based on how well we reflect those we serve first and those who live in the community second.

## Formal and Informal Structures

- For OPH to be successful, it must have formal structures that allow it to be intimately aware of the needs of marginalized people in the community and at the workplace.
- Goals related to representation, confronting and eliminating racist incidents, and dismantling systemic racism and discrimination are not simply achieved through a set of short-term initiatives and actions. Instead, they are achieved by making sustainable changes to processes, structures, and systems operationalized by leaders subject to an accountability framework.

## What actionable strategies does Strat-ology recommend to help OPH operationalize its Anti-Racism / Anti-Oppression Policy?

When interviewees across OPH were asked about the key DEI challenges facing the organization, the most common answer was a leadership team that did not represent the community the organization serves. The second most common answer was a staff that was not fully representative of the communities that OPH serves, especially at managerial and supervisory levels. Almost all interviewees felt a strong correlation between OPH's level of representation and its ability to drive health equity in the community. Interviewees were confident that public health organizations whose leadership and staff are not fully representative of the communities they serve struggle to design services that truly meet the needs of a changing community. The impact will be weaker health outcomes among racialized and marginalized communities in the City. Based on feedback from interviewees and Strat-ology's evaluation of OPH's Anti-Racism / Anti-Oppression Policy, the following eight actionable areas of change, mostly related to leadership, processes and structures, are recommended to operationalize the policy:

1. Hiring a new SLT member and a DEI Planning & Implementation Team responsible for driving DEI at OPH by facilitating and coordinating structural, process, and systemic changes.
2. Accountability structures that engage voices from inside and outside OPH to ensure roadmaps for change are being developed, validated, and implemented.
3. Innovation teams that bring together health innovators in the community and OPH staff to develop new programs and processes that would allow OPH to achieve the intent of its Anti-Racism / Anti-Oppression Policy.
4. Instituting processes and structures dedicated to dismantling systemic and incidental barriers faced by members of EDGs at OPH. This would begin with a detailed and formal review of current HR processes and the inherent systemic barriers faced by members of EDGs when it comes to

recruitment, mentorship, advancement, and retention. This would also entail reviewing the City's Workplace Violence and Harassment Policy.

5. An internal data collection process that focuses not only on measuring the changing levels of diversity at OPH across the organization but also at the level of managerial ranks, job categories, and service delivery teams. It is important to ensure that those interpreting the data and designing action plans come from backgrounds reflected in the data.
6. A transparent and easy-to-access process for members of EDGs to report DEI challenges for formal review and investigation and informal information sharing.
7. Community-based engagement structures that ensure OPH is: (1) hearing the voices of the more marginalized communities in Ottawa, (2) creating regular opportunities for engagement, and (3) providing opportunities to community members to evaluate access and relevance of existing services. This will help OPH build a detailed map of health equity gaps among racialized communities in Ottawa.
8. Highly experiential training and development for leaders to build the necessary advanced skills and proficiencies to deal with DEI-related challenges better.

For a bird's eye view of the recommended changes to policy elements and action plans in OPH's Anti-Racism / Anti-Oppression Policy that flow from the actional areas of change listed above, please see Appendix B. More detailed recommendations around each of the policies and actionable areas of change can be found in the detailed Audit Report, along with recommendations on the roles staff must take on to drive DEI at OPH.

## Detailed Audit Report

The structure of the audit is guided by the structure of the Anti-Racism / Anti-Oppression Policy. Strat-ology's evaluation and recommendations are presented to speak to each section of the policy.

### Overall Structure of the Policy

The structure of Ottawa Public Health's (OPH) Anti-Racism / Anti-Oppression Policy is grounded in the Ontario Health's Equity, Inclusion, Diversity, and Anti-Racism Framework. This is a comprehensive framework addressing 11 areas of action (See Appendix C). OPH identifies four of these areas of action, namely (1) Collecting Equity Data; (2) Embedding DEI into strategic planning; (3) Partnering to Advance Indigenous Health; and (4) Investing in Implementation, as core to realizing its anti-racism / anti-oppression policies. However, Strat-ology suggests that these four areas do not capture the fundamental principles that underpin OPH's Anti-Racism / Anti-Oppression Policy but are pivotal processes that need to be in place for the successful operationalization of any Anti-Racism / Anti-Oppression Policy. Accordingly, strat-ology recommends that these four pivotal processes be integrated into the Purpose Section of the Anti-Racism / Anti-Oppression Policy (See the section entitled Purpose later on this document) to form the backbone of all action plans that emerge from OPH's Anti-Racism / Anti-Oppression Policy.

This leaves a gap in the presentation of the current Policy: What are the fundamental principles that underpin OPH's Anti-Racism / Anti-Oppression Policy? Based on Strat-ology's Audit, including a review of 19 documents (see Appendix A) and 25 conversations with leaders across the organization, the following fundamental principles are suggested to underpin OPH's Anti-Racism / Anti-Oppression Policy.

### Recommendation: Fundamental Principles that should Underpin OPH's Anti-Racism / Anti-Oppression Policy

**Strat-ology recommends that OPH's Anti-Racism / Anti-Oppression Policy begin by outlining the following fundamental principles.**

#### Community Engagement

- The most valuable strategies that will shape OPH's future must include input from diverse voices within the community. These voices should include community leaders but focus on community members.
- Public Health Outcomes are not singularly driven or achieved by OPH. To achieve inclusive and equitable health outcomes, OPH recognizes the need to work with diverse and representative partners in the community, including civil society and the public and private sectors.

#### Systems & Processes

- OPH is committed to confronting and eliminating discriminatory and racist incidents and behaviours within the organization and in its work with the community. It will build systems that support safe incident reporting, information sharing, and accountability while fully recognizing that racism and oppression in 2022 are largely subtle.
- OPH is committed to confronting and eliminating discriminatory and racist incidents and behaviours when working with the communities it serves by building systems that fully recognize and reflect the reality that racism and oppression in 2022 are largely subtle.
- OPH is committed to identifying barriers to fair employment and promotion and designing policies that effectively promote diversity, equity and inclusion in the workplace.
- OPH is committed to identifying service areas where the diversity among service providers does not match the diversity of the communities it serves and building roadmaps for change.
- Collecting qualitative and quantitative data both inside the organization and from the communities OPH serves is key to understanding the state of DEI at OPH. In addition, purposeful measurement and reporting are fundamental to addressing inequity and challenges related to diversity and inclusion.
- OPH acknowledges the existence of systemic discrimination not only at the organization level but also among job categories, levels of seniority, and in internal and external service delivery teams and is committed to identifying and eliminating it.

### Leadership & Culture

- Achieving OPH's business goals is inextricably linked with achieving the goals, strategies, and action plans that form OPH's Anti-Racism / Anti-Oppression Policy.
- Successfully implementing OPH's Anti-Racism / Anti-Oppression Policy involves employees and partners across the organization. Still, its success falls squarely on the shoulders of OPH's Senior Leadership Team.
- An OPH enabled to improve diversity, equity and inclusion is one whose leaders feel empowered, capable, and comfortable confronting discrimination at the individual, team and organizational levels by building roadmaps for change.
- OPH commits to a culture of openness and transparency when hiring, promoting, and retaining staff and leadership.

### Staffing

- OPH is committed to building a corporate culture that is welcoming and inclusive.

- A forward-looking OPH is one where there is a strong correlation between the levels of diversity in the community, OPH's staff, and its leadership. Reflecting and representing diversity means setting representation goals that are forward-looking vs. designed to meet minimum standards. Authentic representation is measured based on how well we reflect those we serve first and those who live in the community second.

### Formal and Informal Structures

- For OPH to be successful, it must have formal structures that allow it to be intimately aware of the needs of marginalized people in the community and at the workplace.
- Goals related to representation, confronting and eliminating racist incidents, and dismantling systemic racism and discrimination are not simply achieved through short-term initiatives and actions. Instead, they are achieved by making sustainable changes to processes and systems operationalized by leaders subject to an accountability framework.

### Analysis: Introduction

An evaluation of OPH's Anti-Racism / Anti-Oppression Policy, clearly reveals the enormous level of effort that has gone into ensuring the Policy is well thought out and comprehensive in the themes it covers, and the action plans it envisions. Strat-ology's detailed analysis included a review of 19 documents (see Appendix A) and 25 conversations with leaders and staff across the organization. These conversations allowed Strat-ology to understand the state of DEI at OPH (see the section entitled "What is the current state of DEI at OPH" on Page XX in the Executive Summary) and evaluate the content and operationalization of OPH's Anti-Racism / Anti-Oppression Policy. This led to the following recommendations on (1) how each policy can be strengthened by introducing themes that are covered lightly or not at all in the current Policy, and (2) suggestions to improve the action plans that emerge from each policy. **The resulting recommendations intend to help OPH drive sustainable change in terms of DEI in the organization.**

### Analysis of the Overall Policy Statement

The overall policy statement that grounds OPH's Anti-Racism / Anti-Oppression Policy is well thought out. However, gaps emerge when one asks if the policy statement sets OPH up to drive sustainable change in DEI. **Below is Strat-ology's summary of the themes currently covered in the policy statement and recommendations for themes that should be included in an updated statement.**

#### Covered Themes

Themes that are covered in the policy statement include:

- OPH's Anti-Racism / Anti-Oppression Policy is grounded in the Ontario Health's Equity, Inclusion, Diversity and Anti-Racism Framework.
- Racism is a public health issue.
- Racialized communities in Ottawa experience discrimination in accessing health services.
- The culture at OPH should be inclusive and free from discrimination.
- At OPH, all employees have equal access to opportunities.
- Racism will be dealt with directly by confronting and eliminating discrimination at the individual, organizational, and societal levels.
- Areas of systemic racism will be identified and eliminated.
- Representation will be pursued in governance, employment, service delivery, information and communication.

Recommendation: Themes that need to be covered more clearly in the policy statement include:

**Strat-ology recommends that a more comprehensive Anti-Racism / Anti-Oppression Policy would also include the following themes:**

- OPH is committed to institutionalizing processes and structures that ensure all voices within the organization are heard through a variety of input mechanisms;
- OPH understands the pivotal role senior leaders play in dismantling systemic discrimination, given their power and position in the organization.
- OPH is committed to investing in leaders and staff that have the capacity and capabilities to drive DEI-related change at the organization.
- OPH commits to collecting quantitative and qualitative data to ensure its DEI strategies, initiatives, and action plans are grounded in evidence and reconciliation.
- OPH is committed to driving tangible and measurable change across the organization when it comes to DEI through data collection, training, and defining detailed and measurable roadmaps that make changes to processes and structure.

## Amplifying the Purpose Statement

Although the Policy's Purpose Statement is well articulated, it lacks a certain degree of specificity. Therefore, **Strat-ology recommends (1) integrating the four action-oriented elements of the Ontario Health's Equity and Anti-Racism Framework in the Purpose Statement; and (2) amplifying the themes in the Purpose Statement.** The themes that should be part of this amplified purpose statement include: (1) measuring the progress of the implementation of OPH's Anti-Racism and Anti-Oppression Policy, (2) enabling OPH staff and managers to deal with DEI challenges, and (3) holding leaders accountable to the successful implementation of OPH's Anti-Racism / Anti-Oppression Policy. Below is an example of how the purpose of the OPH's Anti-Racism / Anti-Oppression Policy could be amplified. The items in quotations are currently part of the policy statement. The items not in quotations and in blue font are suggested additions.

*"The purpose of this policy is to establish direct actions at the organizational level to identify the existence of systemic racism, and to recognize, remedy, and prevent racially inequitable outcomes and power imbalances in the workplace. This policy provides guidelines to ensure that programs," structures, processes, "practices, and procedures at OPH align with Ontario's anti-racism strategy guiding principles. The policy aims to":*

- *"Increase awareness of the impact of racism and the daily psychological effects of systemic structures rooted in colonization on the health and lives of First Nations, Inuit, Métis, ACB, and racialized peoples."*
- *Facilitate the identification, description and dismantling of racism and oppression by setting-up processes, systems, and structures to generate roadmaps for change and hold the organization accountable by collecting and analyzing both qualitative and quantitative equity data to report on DEI progress.*
- *Help leaders recognize the inextricable link between defining and achieving strategic goals like health equity at the organizational and program levels and becoming a demonstrably more diverse, equitable, and inclusive organization.*
- *Create a vision for anti-oppression and anti-racism at OPH that leaders foster, build, advance, expand and own by applying financial resources, managerial attention, and people resources.*
- *Facilitate capacity and capabilities building among staff and leaders at OPH to deal with DEI challenges within the organization and OPH's service delivery models.*
- *Encourage an action-oriented approach to DEI at OPH. One that focuses not only on passive actions such as data collection and training but also on building roadmaps for change that identify particular challenges and build resourced solutions grounded in process and structural change.*



## OPH's Anti-Racism / Anti-Oppression Policy: Evaluating the Seven Policy Application Areas & Associated Action Plans

Each of the seven areas of the OPH's Anti-Racism / Anti-Oppression Policy has been evaluated based on Strat-ology's experience, lessons learned from a review of the documentation provided by OPH to Strat-ology, an understanding of best practices in DEI, and interviews with several leaders, managers, racialized and Indigenous staff at OPH and some of OPH's key community partners. **The result of this evaluation includes Strat-ology's recommendations on what should be covered by each area of the Anti-Racism / Anti-Oppression Policy and action plans that would allow OPH to realize the intent of each policy area.**

In addition to providing descriptions of each policy area, OPH has provided Strat-ology with descriptions of the action plans designed to realize each policy area's intent. Strat-ology provides recommendations on how these action plans can be strengthened. To develop these recommendations, Strat-ology analyzed the current set of action plans using an inquiry analysis approach based on the following 10 questions. These questions have allowed Strat-ology to suggest a more comprehensive set of action plans associated with each policy area in OPH's Anti-Racism / Anti-Oppression Policy.

Do the set of action plans presented in each policy area:

1. Involve leadership at all levels of OPH?
2. Allow for the creation of organizational processes and structures that will facilitate implementation?
3. Represent a comprehensive approach to operationalizing the policy area?
4. Allow OPH to deal with incidental and subtle occurrences of racism and discrimination (e.g., microaggressions, being left behind or passed over for opportunities for advancement, etc.)?
5. Allow OPH to begin dismantling systemic racism and discrimination within the organization and in how it deals with the community?
6. Allow managers and leaders to reflect and learn about improving health equity?
7. Allow OPH to dedicate resources and design structures that will result in positive and sustainable changes to DEI?
8. Positively change how staff, managers, and leaders will think and act when it comes to DEI while holding them accountable for progress?
9. Help staff, managers, and leaders build their capabilities and capacity to deal with DEI challenges?
10. Create more hiring, engagement, and advancement opportunities for employees from equity-deserving groups?

## Auditing Policy Area #1: Identifying Clear Accountability

### Evaluating the Contents of the Policy and Recommending Changes

The description of *Policy 1: Identifying Clear Accountability* appropriately suggests that anti-racism and anti-oppression lenses must be adopted whenever strategies are developed, and action plans are designed. However, it seems to place the responsibility for accountability on staff resources, i.e., those closer to the OPH's service delivery.

Certainly, some accountability lies with all managers and supervisors. **However, it is recommended that the Policy Area: Identifying Clear Accountability reflect that the ultimate accountability for implementing OPH's Anti-Racism / Anti-Oppression Policy clearly lies with senior leaders within OPH.** They have both formal and informal power to ensure anti-racism and anti-oppression lenses are actively used in developing strategic plans and designing the resulting action plans. Leaders must also ensure that performance measures are developed, and both qualitative and quantitative data are collected to track how diversity, equity, and inclusion outcomes are being achieved as a result of the application of anti-racism and anti-oppression lenses.

### Evaluating Existing Action Plans and Recommending New Initiatives

Three initiatives frame the implementation of the *Policy Area: Identifying Clear Accountability*: (1) hiring two staff to co-lead and coordinate the implementation of the action plans associated with OPH's Anti-Racism / Anti-Oppression Policy, (2) re-establishing a Health Equity / Anti-Racism Steering Committee that leads the planning, implementation, monitoring and evaluation of different initiatives that make up the action plan, and (3) ensuring the BOH's strategic direction aligns with Anti-Racism / Anti-Oppression strategies and values.

In principle, these initiatives will help create accountability for the implementation of OPH's Anti-Racism / Anti-Oppression Policy. However, to be more practical, these action plans need much more specificity and a greater understanding of the nature of racism and discrimination at OPH. First, racism in organizations is both incidental and systemic. Senior leaders are accountable for changing both forms of racism at OPH. Without an investment in DEI leadership, accountability will wax and wane. Therefore, **Strat-ology recommends that the first step in this process requires the establishment of a dedicated DEI Planning & Implementation Team that reports to a Senior Leader who sits on the Senior Leadership Team and whose job it is to develop and implement a fulsome DEI Strategy at OPH.** Figure 1 outlines the roles and functions of this dedicated team. It is expected that the team structure will be adapted to fit with actual structural and HR norms at OPH.

**FIGURE 1: ROLES & FUNCTIONS OF THE DEI PLANNING & IMPLEMENTATION TEAM**

SLT MEMBER
This would be a new position on the SLT, reporting directly to the Medical Officer of Health. This individual is accountable for designing and implementing OPH's Anti-Racism / Anti-Oppression Policy over the next 2 to 5 years. They would oversee the development of a DEI Strategy and the action plans (changes to processes and structures). The individual works with the Lead (see below) to push OPH's DEI agenda forward and attends meetings with their team to provide direction and counsel. On behalf of the Medical Officer of Health, this SLT Member works with the BOH and other members of the SLT who oversee other key areas of OPH to ensure the DEI agenda is moving forward to eliminate systemic and incidental racism and discrimination at OPH.
LEAD
This individual would report to the new SLT member. Their function would be to provide input into OPH's DEI strategy while being responsible for turning this strategy into highly implementable roadmaps for change across the organization, within departments and teams. A significant component of implementation includes designing and facilitating the implementation of processes and structures that would deal with incidental and systemic expressions of racism and discrimination. In addition, the Lead has the oversight and decision-making authority to progress OPH's DEI agenda by working closely with teams reporting to different members of the SLT.
MANAGER
The manager would support the lead by helping various teams across the organization implement initiatives, collect data and provide feedback related to DEI. The manager would also recruit DEI representatives from each OPH program to ensure that the DEI agenda is well understood and implemented at the programmatic level.
COORDINATOR
The coordinator would help communicate the DEI agenda throughout OPH and provide coordination, communication and implementation support to the Lead and the Manager.
TEAMS
Teams whose work is aligned with DEI would be reorganized to come under this new member of the SLT.

Establishing a dedicated DEI Planning & Implementation team at OPH will positively move the design and implementation of OPH's Anti-Racism / Anti-Oppression Policy forward. However, it is important to ask whether such a team risks being marginalized because senior leaders and key staff may begin to feel that they are no longer responsible for DEI-related challenges or change plans at OPH?

It is interesting to note that in the *Anti-Racism Secretariat, City Of Ottawa: What We Heard Report: Findings From Internal / External Consultations - September 2021*, managers reveal that they do not always feel they have the knowledge and skills to address racism when it happens. The same report suggests that diverse employees feel that dealing with racism and discrimination is not always prioritized or taken seriously by leaders with limited personal lived experience levels. In addition,

the report reveals that racialized employees across the City of Ottawa feel general resistance and defensiveness among non-racialized colleagues, which creates significant barriers to changing DEI. This suggests gaps in managers' willingness and ability to act around challenges related to discrimination and racism. Interviews with program managers and staff from EDGs at OPH confirmed the City of Ottawa findings suggesting there were several areas of OPH where DEI was not taken seriously or pursued as a strategic imperative. However, in speaking to key members of the SLT, they felt that there was a strong culture at OPH across organizational levels that supports increased diversity in the organization.

Nevertheless, there was also some realization that the challenges faced by OPH and the lack of representation at various levels of management demonstrated a need for change and potentially a lack of capacity when attempting to deal with complex incidental and systemic DEI challenges. Based on these realities, it would be very plausible that establishing a dedicated DEI Planning & Implementation team at OPH comes with a significant risk that senior leaders and key staff may begin to feel that they are no longer responsible for DEI-related challenges or change plans at OPH. To prevent this from happening, **Strat-ology recommends the following:**

- At least two senior leaders attend a monthly update meeting held by the dedicated DEI Planning & Implementation team to ensure buy-in and input from across the organization.
- Four to six well-respected managers from key service delivery areas at OPH be formally allocated (e.g., 10 to 15 percent of their annual paid time) to support the dedicated DEI Planning & Implementation team; these team members would change on an annual basis. By instituting opportunities for formal involvement, OPH ensures the DEI team's work will move forward with cross-organizational input and buy-in.
- To deal with the capability and capacity gap felt by leaders across OPH when faced with complex incidental and systemic racism and discrimination, Strat-ology recommends highly customized experiential training (case-based) and small-group coaching sessions that would help senior leaders and managers honestly discuss their reluctance in addressing racism and discrimination at OPH, and then help them develop the required knowledge and tools.
- Strat-ology recommends that the new member of the SLT who oversees the dedicated DEI Planning & Implementation team at OPH have the same status as other members of the SLT to ensure they are empowered and have the organizational legitimacy to move the implementation of OPH's Anti-Racism / Anti-Oppression Policy forward. In addition, SLT members must work to hire an individual with the professional background necessary to be a contributing member of the team so that they will be respected and trusted by SLT colleagues, key internal and external stakeholders, and OPH employees from EDGs. This professional background must include DEI-related lived experience. This addition to the SLT will be a crucial step in helping SLT be a more diverse team. However, if this remained SLT's only diverse addition in the next three years, then little advancement around health equity is likely.
- Finally, Strat-ology recommends that the SLT spend 2 hours bi-annually discussing OPH's Anti-Racism / Anti-Oppression Policy. This is in addition to the regular reporting-based updates provided

by the dedicated DEI Planning & Implementation team to SLT. These regular updates create accountability, which is very necessary to track the progress of the implementation of OPH's Anti-Racism / Anti-Oppression Policy. The bi-annual sessions would allow SLT members to brainstorm and deal with more complex DEI challenges at OPH. These meetings create formative accountability, allowing SLT members to grapple first-hand with managing different forms of racism and discrimination at OPH by debating how to create alignment, fix alignment, and experiment with alignment when it comes to the work of the organization and its DEI challenges and goals.

## Auditing Policy Area #2: Ensuring Ontarians are Reflected and Represented within OPH

### Evaluating the Contents of the Policy and Recommending Changes

The underlying theme of the policy is to ensure equitable access to employment and advancement at OPH. Fundamental to OPH's Anti-Racism / Anti-Oppression Policy is a staff that represents the diversity in the City of Ottawa. The only areas of the policy that are elaborated include collecting employee race data. The assumption is that this data will identify gaps and foster change. OPH sees the collection and analysis of this quantitative data as key to defining hiring and promotion trends, identifying barriers, underpinning change recommendations, and measuring outcomes regarding employment levels of First Nations, Metis, Inuit, and other racialized groups.

Data is key to understanding the state of DEI in recruiting, promoting and retaining people from equity-deserving groups. Data is often seen as the first step by most organizations interested in achieving a representative set of leaders and employees. Although data matters, it is important to note that building a representative organization based on data that outlines existing levels of diversity in the City of Ottawa is not forward-looking but a strategy that looks backwards. This approach to representation ensures OPH will always lag in terms of representing real-time diversity in the City of Ottawa.

It is also important to note that, on its own, data will not drive representation at OPH. To achieve this goal, OPH will require key internal stakeholders to debate and discuss key questions<sup>1</sup> such as: (1) What are the barriers to being promoted faced by members of equity-deserving groups at OPH? (2) Will the current hiring and promotion systems and HR processes drive diversity, equity and inclusion? (3) Do union policies promote or create barriers to achieving goals related to representation? (4) Is it enough for OPH to meet representation goals, or should it surpass them? Why? (5) What does authentic representation look like? Should it be explored and tracked in various job functions and across levels of seniority? (6) What should OPH's priority areas be to achieve higher, more thoughtful levels of representation? These discussions will then serve to develop a much stronger policy statement and set of action initiatives.

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<sup>1</sup> Many of these questions were inspired after reviewing the "What We Heard Report"

**Based on the discussion above, Strat-ology's first recommendation in this policy area related to representation is that OPH's Anti-Racism / Anti-Oppression Policy must commit to a forward-looking definition of representation, i.e., one that looks beyond simply reflecting the current level of diversity in the City of Ottawa, and focuses on reflecting the diversity that is likely to be present in the City over the next 10 years. The policy should also clearly state that OPH will have a more authentic set of diversity goals by job function and managerial levels.**

**Strat-ology's second recommendation in this policy area, related to representation, is that OPH must commit to dedicating resources that will work closely with the City of Ottawa to ensure OPH's needs for a more diverse workforce are better reflected in the City of Ottawa's Recruitment and Staffing Policy.** Although a review of the City's policy is outside Strat-ology's scope of work, a brief examination of the policy reveals that in its current state, it is unlikely to drive sustainable, diverse hiring at OPH and the City at large. Here are a few insights from Strat-ology's brief review:

- Like many recruitment and staffing policies, the City's Policy refers to hiring the best person for the job and being merit-based. This is a key theme throughout the Policy. Unfortunately, merit and the idea of 'best' are fraught with bias. This is not acknowledged in the Policy, nor are more fulsome definitions of these ideals provided.
- There is little in the City's current Policy to ensure OPH will be able to change the level of diversity in its staff. For example, there is: (1) a strong bias to hire internally vs. externally; (2) no requirement to post jobs in places where more diverse candidates are likely to look; (3) no standards that must be followed for the writing of job descriptions to ensure inclusion; (4) no room for unsolicited applicants which limits the number of diverse potential applicants for any job; and (5) no requirement that hiring panels must have a minimum number or percentage of candidates from racialized groups. These are some of the best practices in promoting hiring from deserving equity groups that are not well laid out in the City of Ottawa's Recruitment and Staffing Policy.
- Racialized applicants will, on average, likely have less stellar experience than non-racialized applicants, given the reality of systemic racism and discrimination. If this is something OPH acknowledges, it is not reflected in the City's Recruitment and Staffing Policy. For example, requiring assignments is one way to put all candidates on equal footing. They allow hiring managers to assess candidates without being influenced by their experience.
- Does OPH acknowledge the difference between lived diverse experience vs. an ability to work with diverse populations? Are these valued differently when evaluating candidates? This is not discussed in the City's Recruitment and Staffing Policy.
- Although the City's Recruitment and Staffing Policy outlines the presence of Staffing Officers able to provide advisory services to hiring managers, are there experts in the department specializing in driving diversity recruitment? Without access to this highly-specialized expertise, it is difficult to see

how the City's Recruitment and Staffing Policy will support OPH in becoming more diverse, equitable, and inclusive.

Based on this discussion, **Strat-ology recommends that OPH commit to working closely with the City's HR department by providing input on ensuring recruitment, retention, and advancement at OPH is more diverse, equitable, and inclusive.**

### Evaluating Existing Action Plans and Recommending New Initiatives

OPH currently has four key action plans to improve representation. Strat-ology has reviewed these plans and suggests improvements.

The first action plan involves aligning hiring practices to maintain/increase employee representativeness based on Ottawa's population's diversity and the current market availability data. Although there is a strong commitment to quantitative data collection, there is no clear commitment to collecting qualitative data, i.e., the stories of existing employees from equity-deserving groups that would allow OPH to gain a first-hand understanding of existing barriers to equity and inclusion. These stories will be pivotal in informing the decisions around how to change hiring and promotion at OPH to drive a more diverse workforce at all levels of the organization, from front-line staff to the senior leadership team. Strat-ology found that in speaking with employees from EDGs, the learning from these stories would be very valuable in helping OPH understand the nuances of barriers to hiring and promotion that would help create useful changes to the related systems. Without a commitment to collecting qualitative DEI data, OPH may be compromising its commitment to Quality as defined in its "Protecting our Community's Health: 2022 Strategic Action Plan Refresh," where quality requires using the best available evidence to continuously improve OPH's work. The City's Recruitment and Staffing Policy makes capturing the actual hiring experience at OPH even more crucial since, in its current state, this policy will unlikely result in more diverse hires at all levels in the organization, as outlined previously in the audit.

Based on the discussion above, **Strat-ology recommends that one of OPH's key action plans related to driving representation should be the collection of quantitative and qualitative data around the barriers to diversity, equity, and inclusion at OPH so it can better understand the incidental and systemic barriers that exist for new hires and existing staff members seeking advancement. OPH should consider engaging a case-writing resource that would work with each member of the SLT to identify a key diversity-related challenge that has been faced in one of the departments under their purview. Exploring this issue would result in a written case that would allow managers to identify DEI issues, understand their impact on the workforce, and explore potential solutions.**

The second action plan for driving representation at OPH involves supervisors using a checklist to ensure diverse hiring panels and procedures. OPH rightfully acknowledges that one of the key risks associated with a checklist is monitoring its authentic use. Certainly, OPH hopes that as different managers use the checklist to guide their hiring process, diversity, equity and inclusion will be at the forefront of their

decisions. However, this assumes that DEI issues related to hiring mostly occur at the individual level. Although there may be some merit to this argument, there are an equal number of DEI issues faced by organizations in their hiring processes that are systemic. Therefore, creating representation via hiring practices requires a stronger action initiative than using checklists. It requires evaluating HR systems at OPH and designing processes that (1) identify where representation is needed most across different job functions at OPH over the next years, (2) result in highly inclusive job postings; (3) outline sourcing strategies to attract diverse candidates; (4) introduce evaluation mechanisms like tests and assignments that level the playing field pre-interview, acknowledging the reality of systemic discrimination; and (5) ensure fair and equitable evaluation of candidates post-interviews. **Strat-ology recommends that OPH put together a task force to work with the City of Ottawa's HR to ensure formal input into plans related to driving more diverse hiring and more equitable opportunities for advancement at the City and OPH. This task force would also be tasked with conducting focus groups and interviews within OPH to collect suggestions from managers and staff on how to improve diversity hiring and advancement at OPH. OPH may decide to leverage its delegated authority to pursue forward-thinking policies related to DEI recruitment, advancement, and retention.**

The third action plan to achieve representation is related to building sustainable relationships with external community partners in hopes that leaders and community champions can help identify talented potential hires. Although creating these relationships is an effective way to promote dialogue around the public health needs of communities within Ottawa, will these relationships drive diverse job applicants to engage with OPH? These relationships may be a powerful vehicle to disseminate job postings within communities where OPH may have limited access. However, in today's social media world, it is important to ask: Are diverse individuals not applying to OPH because they are not aware of the organization or job openings, or do they potentially not see themselves being welcomed into the organization and/or being able to pursue an opportunity-filled career path at OPH? In addition to building relationships with community leaders, **Strat-ology suggests that it may be more powerful to offer support, training, and resources to current employees from equity-deserving groups interested in championing diversity recruitment at OPH.** These additional resources (time, remuneration, and training) would allow current employees from equity-deserving groups to deepen and broaden their current networks within their own communities. In addition, investing in these champions is often the most powerful way to bring highly talented potential hires to the table who, due to the relationship with the champion, can see a potential career path at OPH. This recommended action plan is in line with the importance of community relationships and the challenges OPH staff face in building these relationships, which was discussed in great detail in the City's report entitled, *Anti-Racism Secretariat, City Of Ottawa: What We Heard Report: Findings From External Consultations - September 2021.*

The fourth action plan to offer mentorship to Indigenous and racialized staff at OPH is an excellent way to level the playing field around advancement. However, the description of the action plan is a little generic and could benefit from a little more specificity. First, many organizations assume that (1) all leaders are willing to be mentors, (2) mentorship is a skill possessed by all senior professionals, and (3) mentorship looks very similar no matter the background of the mentee. Developing a mentorship process requires ensuring equal access, a process to train mentors, defining how mentorship may look



and feel different based on who is being mentored, defining a mentorship journey and delineating potential outcomes. Mentorship effectiveness is often only measured at the individual level; this is short-sighted. Authentic, engaged, and truly giving mentorship that helps a mentee build skills, learn from experience, navigate DEI challenges, and prepare for advancement is one of the most powerful ways to expose and dismantle systemic racism and discrimination. A better measure of mentorship effectiveness is whether those receiving mentorship advance more quickly at OPH than those not part of this process. **Strat-ology recommends that OPH develop and implement a formal mentorship strategy that involves annually 10 to 15 diverse, high-potential employees from equity-deserving groups and tracks their progress over 3 years.** This system should be funded to operate over the next 3 years, at which point its effectiveness and impact would be assessed.

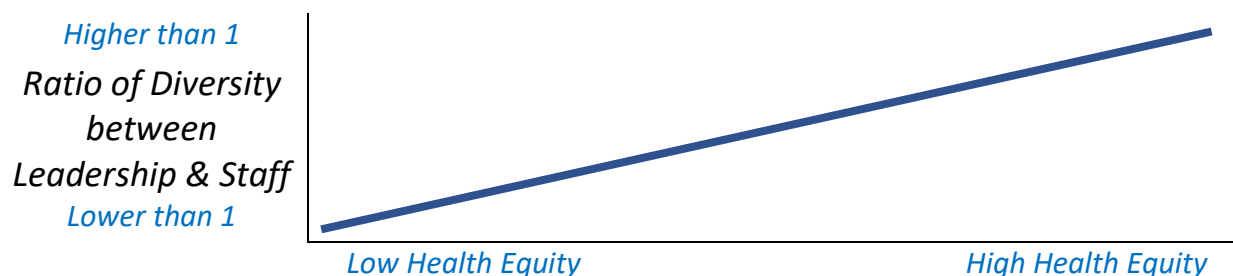
It is important to note that mentorship at OPH is currently only available to those who can meet the hiring bar. Acknowledging the long-time existence of systemic racism, one must ask if OPH should consider another complementary approach? One that is grounded in development, where, say, potential indigenous hires who may not be able to meet the hiring bar today are hired into OPH on a three-year development track to ensure they are ready to take on full-time, permanent positions in the organization over time. **Strat-ology recommends that OPH create a development strategy for this group of potential hires, work with SLT members to identify areas of the organization that would benefit the most from these hires, work with community groups to identify potential candidates, and hire 5 people to participate in this opportunity annually.** This development system should be funded to operate over the next 3 years. At this point, its effectiveness and impact would be assessed. This approach to development and the earlier approach to mentorship ensure that OPH is making a tangible commitment to deconstructing systemically discriminatory structures by creating a cadre of diverse potential leaders that would be equipped to apply, be hired, and succeed in advancing at OPH. These initiatives do not only have to be for racialized staff, but they do need to be designed to ensure the makeup of those being formally mentored is representative of the populations served by OPH.

The fifth action plan recommended by Strat-ology is to measure diversity representation in different groups within OPH. These groups can be defined as managerial levels, job categories, and service delivery teams. **Once OPH has data on the level of diversity in each of these groups, it should develop roadmaps to facilitate diversity hiring to create a critical mass in each of these groups of OPH.** For example, when members of EDGs are the only hires in a particular part of OPH or if they are one of few, feelings of isolation are common, as is a sense of not being listened to and tokenism.

Policy Area 2 is pivotal to OPH's Anti-Racism / Anti-Oppression Policy because representation is foundational. It is pivotal to improving public health outcomes. When clients see themselves, i.e., their culture, religion, ethnicity, race, and lived experience reflected in those promoting health and those they turn to for health advice and/or services, there is a greater sense of trust and safety which makes them more amenable to develop positive connections with OPH and its public health messaging. However, it is interesting that many interviewees who work with the community reflected that racialized communities in the City are concerned about representation at the service delivery level and among those making the decisions. Strat-ology heard several stories of community members asking OPH staff

about representation at the organization’s most senior levels and feeling that without this representation, the services being provided in the community are unlikely to be sustainable; “how do we know they will continue to think our needs matter?” The ratio of the level of diversity at the leadership level (SLT, Managers, Supervisors) vs. at the staff levels must be on 1 or greater than 1<sup>2</sup> to drive health equity (see Figure 2) because this drives a *stronger, more intimate, and a highly experiential understanding of the communities that live in Ottawa and decision making that is grounded in lived experience*. Many of OPH’s partners in the community feel that achieving representation at both the leadership and staff levels at OPH is important and urgent because the decisions that will emerge from a more representative OPH will likely allow it to have an even greater impact on the communities it serves.

**FIGURE 2: THE IMPACT OF THE RATIO OF DIVERSITY BETWEEN LEADERSHIP AND STAFF ON HEALTH EQUITY**



## Auditing Policy Area #3: Including and Engaging Key Internal and External Voices at OPH

### Evaluating the Contents of the Policy and Recommending Changes

Including voices that otherwise may not be heard across the organization is pivotal to OPH’s Anti-Racism / Anti-Oppression Policy. This is reflected in the current policy description. However, details on what is meant by inclusion and feedback leave the policy feeling very general. Without accessible options for employees within OPH and community members to share experiences via feedback, the foundation of DEI at OPH would be weekend. Although feedback is an excellent starting point, **Strat-ology recommends that the policy needs more specificity and grounding in reconciliation via storytelling and counsel, as suggested in the report entitled, “Reconcili-Action at Ottawa Public Health.”**

Many organizations that develop Anti-Racism / Anti-Oppression Policies are appropriately focused on the future state of DEI. However, when an organization is reluctant to tangibly acknowledge, hear, and accept the realities of its past, DEI initiatives within the organization risk being generic and out of context. This reconciliation process plays a significant role in all DEI policy settings, but it is,

<sup>2</sup> For example, if 20% of leaders are from EDGs and 30% of staff are from EDGs, the ratio is less than 1. If 50% of leaders are from EDGs and 50% of Staff are from EDGs, the ratio is 1. If 20% of leaders from EDGs and 10% of staff are from EDGs, the ratio is higher than 1.

unfortunately, missing from OPH's Anti-Racism / Anti-Oppression Policy and the Ontario Health's Equity, Inclusion, Diversity, and Anti-Racism Framework.

Reconciliation is a commitment OPH makes in its "Protecting our Community's Health: 2022 Strategic Action Plan Refresh" and is defined as working with Indigenous partners to advance indigenous health equity; this is pivotal. However, reconciliation plays a deep and broad role in engaging key internal and external voices from all under-represented groups. In fact, a key finding from Strat-ology's interviews with OPH staff for EDGs is that although they are hopeful that OPH will continue its journey to becoming more diverse, there is less trust that this diversity will come at more senior levels in the organization or that higher levels of equity and inclusion will follow. For many, this comes from experiencing discrimination in the past and the present. Providing an opportunity to members of EDGs to tell their stories will help inform OPH's vision for DEI in the future while serving to 'turn the page' on the past and create greater buy-in to a stronger future vision for DEI.

Storytelling is a vehicle to foster reconciliation by (1) serving as a key form of qualitative data to ground policy development and implementation; (2) educating decision makers and staff about the past, allowing them to build better DEI-sensitive initiatives for the future; (3) creating a reality-check for proposed action plans; and (4) becoming a way in which OPH acknowledges the past and the work that needs to be done to create a new future. The content in the "Anti-Racism Secretariat, City Of Ottawa: What We Heard Report: Findings From Internal/External Consultations - September 2021" is a good first step to storytelling. However, **Strat-ology recommends that storytelling efforts at OPH would identify specific representative incidents of racism and discrimination and explore them in context. These stories would become case studies that would add another set of data points that would positively influence policy development and training. These case studies would make training much more powerful in helping managers explore strategies to deal with racism and discrimination inside the organization and as experienced by individuals in the community interacting with OPH. Strat-ology recommends storytelling be included in the description of Policy Area #3: Including and Engaging Key Internal and External Voices at OPH.**

In terms of counsel, some may argue that feedback from more marginalized communities is a form of counsel. Nevertheless, feedback does not equal counsel. For example, a recent study completed in 2020 found that "indigenous elders contributed to wellness mainly through relationships and interactions with other community members and non-Indigenous people (72.2%); intergenerational oral and written communications (70.1%); community, social and civic life (45.8%); volunteering and jobs (35.4%); and family life (29.9%)." <sup>3</sup> The influence of *elders* is likely similar in many racialized communities, especially new immigrants living in extended family situations. This is briefly discussed in "Anti-Racism Secretariat City of Ottawa: Factsheet: Health Outcomes." **Therefore, Strat-ology recommends that it may be important to include elders from a variety of communities as an important source of counsel as an element of Policy Area #3: Including and Engaging Key Internal and External Voices at OPH.**

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<sup>3</sup>[https://pubmed.ncbi.nlm.nih.gov/32109314/#:~:text=Indigenous%20elders%20contributed%20to%20wellness,and%20family%20life%20\(29.9%25\)](https://pubmed.ncbi.nlm.nih.gov/32109314/#:~:text=Indigenous%20elders%20contributed%20to%20wellness,and%20family%20life%20(29.9%25))

It is also important to acknowledge that even among racialized groups within a community, there are those groups who have more access to resources and interlocutors that make consulting with them more effective and efficient. These community groups are very valuable contributors. However, **Strat-ology recommends that OPH involve new and potentially more marginalized community groups in its consultation process to ensure it hears a truly representative swath of voices in Ottawa. These themes must clearly be stated in Policy Area #3: *Including and Engaging Key Internal and External Voices at OPH.***

### Evaluating Existing Action Plans and Recommending New Initiatives

As currently outlined, the action plans associated with Policy Area 3 include listening to feedback from various diverse stakeholders both inside and outside OPH. The listening occurs via (1) initiatives that seek input on new programs, policies, and initiatives; (2) input-based review processes that ensure DEI objectives are being met by OPH's various DEI-related policies, programs, strategies, and action plans; and (3) a commitment to learning from the lived experience of marginalized populations working in partner organizations. OPH is cognizant of the need for staff time and resources to ensure valuable input. Although these initiatives will certainly give voice to internal and external stakeholders around DEI at OPH, the next step must involve the creation of sustainable structures that allow for initiatives to occur more than once and that are funded so OPH can regularly hear from marginalized voices over time.

As suggested in the OPH's Anti-Racism / Anti-Oppression Policy, developing an OPH group for Indigenous and Racialized employees is an excellent structure that will foster the sharing of personal experiences of discrimination at OPH. Currently, affinity groups exist in the City of Ottawa. However, members of these groups who work at OPH suggest that similar groups at OPH would be valuable but unlikely since OPH does not have the critical mass of employees from EDGs. An inclusive group for Indigenous and Racialized Employees spans the gap. The group will allow members to receive peer support while fostering policy-related discussions that could inform what success looks like at OPH in creating a diverse, equitable, and inclusive organization. **To strengthen this structure, Strat-ology recommends that OPH consider investing in case writing resources that capture representative stories of discrimination and racism and how they are managed, allowing OPH to gain a deeper understanding of the challenges faced by the organization and the progress it has made.** These resources need not be public facing and could be reserved as a qualitative data repository that provides context to DEI decisions.

As OPH is bringing the group for Indigenous and Racialized employees to life, Strat-ology draws the organization's attention to what it heard from interviewees from EDGs. Many felt that although the opportunity to provide feedback as a group is interesting and in line with their values, providing feedback represents a significant time commitment, not only in terms of meetings but in terms of preparation and communications; "I am passionate about these opportunities, but I am not an expert, and it requires me to prepare and spend lots of time in addition to my full-time job."

Strat-ology recommends a few additional structures OPH should consider to engage internal and external voices; these could include: (1) A Diversity Advisory Council made up of community leaders from diverse communities in Ottawa and a selection of key staff from EDGs who can provide input on strategies, review policies, processes, programs, and outreach initiatives to ensure they are equitable, inclusive and likely to be highly effective. (2) Two members of the SLT team should co-chair the Diversity Advisory Council and attend key meetings of the group for Indigenous and Racialized employees, so they hear the DEI challenges OPH faces first-hand within the organization and the community. This signals a level of commitment that goes beyond a 'reporting back' approach and enables members of the SLT to have a more sensitized lens on DEI as they make cross-enterprise decisions and investments. (3) OPH should allocate resources to host an annual set of focus groups with elders of racialized communities to understand better their perspective on health equity within their own communities and how OPH can support this goal. (4) Finally, OPH could set up an Annual Innovation Challenge whose goal would be for key members of OPH to work with health innovators in the community in an annual competition to develop new programs and processes that would allow OPH to achieve the intent of its Anti-Racism / Anti-Oppression Policy.

Two areas of the action plan presented in OPH's Anti-Racism / Anti-Oppression Policy that need particular attention are #4 Acknowledgement of cultural events observed by racialized communities and #6 Improving the inclusiveness of hiring practices.

**#4 Acknowledgement of cultural events observed by racialized communities:** Although acknowledging cultural events is a step towards inclusion, simple acknowledgements, including land acknowledgements, are increasingly seen by Indigenous and racialized communities as empty. **Strat-ology recommends that these acknowledgements be less performative and more authentic by including storytelling, sharing of research, demonstrating how the acknowledgement is linked to the future of DEI at OPH, including the sharing of plans and initiatives and hope for that future. Strat-ology recommends hiring a consultative resource to train and work with leaders to make these acknowledgements less performative and more authentic.**

**#6 Improving the inclusiveness of hiring practices:** Ways to improve the systems associated with hiring are covered under *Policy Area 2: Ensuring Ontarians are Reflected and Represented within OPH*. However, the role of voices and how those voices must be enabled to influence hiring and promotion are key considerations in *Policy Area 3: Including and Engaging Key Internal and External Voices at OPH*. Although the consideration of overburdening racialized staff to sit on hiring panels is an important consideration, representation must be pursued innovatively and must come with some level of influence on the final hiring decision. Representation without influence in the hiring process is often criticized for perpetuating tokenism. Therefore, it is recommended that OPH consider the following questions in designing its final action plan to create more inclusive hiring practices: (1) Is it possible to include outside experts from diverse backgrounds to provide feedback on hiring boards; experts approved by the union and management? (2) Is it possible to design hiring systems that require a minimum level of representation in the slate of candidates being interviewed by a hiring panel? (3) What mechanisms exist in the decision-making phase of a hiring panel's work that ensure the voices of panel members

from equity deserving groups are heard and pivotal in the hiring decision? **These discussions will lead to action plans that will increase representation in the hiring processes at OPH.**

## Auditing Policy Area #4: Addressing Racism

### Evaluating the Contents of the Policy and Recommending Changes

The policy area related to addressing racism at OPH has two key dimensions: recognizing and challenging racism. Is this enough to address racism at OPH? Although recognizing and challenging racism are key, the missing element is organizing to change discriminatory systems by adding structures and changing processes. This is key to addressing racism. **Strat-ology suggests OPH add organizing to change discriminatory systems as a key component of Policy Area #4: Addressing Racism.**

In describing *Policy Area #4: Addressing Racism*, OPH suggests broad initiatives to help its staff recognize and challenge racism. In terms of recognizing racism, the policy currently advocates a generic approach to addressing racism vs. one that is bespoke to the needs and experiences of OPH. For example, almost 50% of OPH's efforts to address racism have to do with online training. Although this kind of training helps educate participants, it rarely leads to action because it does little beyond encouraging introspection. Training that leads to action needs to be bespoke, i.e., training that is custom designed for OPH based on the actual DEI-related challenges it faces within the organization and in its work with various communities. This type of training is not simply informational. It creates an opportunity for leaders at all levels of OPH to see their role in moving the DEI agenda forward. The training needs to be thought-provoking, highly experiential, and grounded in the realities of DEI at OPH.

This type of training is rooted in reconciliation and has two benefits. First, it encourages reflection and discussions about how to solve actual challenges facing OPH. Secondly, when the trainer is empowered to drive change, they can facilitate discussions where participants are encouraged to draw out a roadmap for change. **Therefore, Strat-ology recommends that in the wording of Policy Area #4: Addressing Racism, OPH refers to custom-designed training that will result in roadmaps to deal with racism and oppression within the organization more effectively.** These facilitated sessions are key in challenging peoples' views on race and achieve more than the suggested quarterly staff discussions. Although discussions are a good way to empower people to think and make individual level changes; however, they need to emerge into roadmaps to effectuate systematic change.

Finally, although the policy does not specify how systems can effectively address racism and discrimination at OPH, it seems to rely heavily on the City's Workplace Violence and Harassment Policy (WPVHP) as an effective way to address racism. The WPVHP outlines the policies and processes by which employees can identify and report racism. It also outlines an investigation process and potential outcomes. WPVHP was created in 2003, revised in 2013 and 2018 and then again reviewed in 2021. However, reading this policy from a DEI lens fosters many questions and concerns that indicate it may fall short of effectively addressing racism at OPH. Although a review of the City's WPVHP is outside the scope of this work, Strat-ology shares a few insights about the Policy:

- The grounds for discrimination outlined in the policy are less comprehensive than those listed in the Canadian Human Rights charter<sup>4</sup> or the Equity and Diversity Policy of the City of Ottawa. Why?
- The WPVHP focuses on active behaviours of violence or harassment, which can include those that would reasonably be considered unwelcome, including berating and bullying. However, often workplace discrimination is subtle and difficult to hold to account. For example, repeatedly passing over a talented Black manager and promoting employees from non-EDGs with less experience and qualifications does not require bullying or berating-type behaviours. This behaviour, however, is likely grounded in bias, and the outcome is discriminatory. Unfortunately, the WPVHP does not address these nuances of racist and discriminatory behaviours and outcomes.
- The reporting mechanism around racism and discrimination only requires one superior to be informed of the incident. This begets the question: How can OPH make sure all these incidents are dealt with seriously? A two-party reporting system would result in fewer complaints being mishandled, handled less seriously, or ignored. It is often also the case that victims of discrimination are less willing to report incidents to supervisors who may not have similar lived experiences. This is not considered by the WPVHP.
- Several decisions are made during the reporting and managing process, including deciding on whether (1) a formal vs. informal response is ideal, (2) the need for an investigation, and whether (3) corrective actions need to be put in place. These decisions are made by a “qualified person who is not in conflict of interest with the parties.” First, it is unclear if there are enough people at OPH who are qualified and experienced in helping to identify and resolve diversity-related challenges. Second, a one-party investigation process leaves itself open for criticisms related to bias, equity, and fairness. A two-party system is much more credible. Third, what is crucial in all of these cases is the involvement of a peer who can accompany the individual making the complaint to all meetings related to the incident to foster accountability, understanding, and perspective.
- Finally, the wording around responsibilities by staff function seems to assume that all racism related issues occur at the employee level. This needs to be reworded to recognize that preventing, reporting, investigating, and resolving racist incidents at OPH is a cross-organizational and cross-level responsibility.

**Strat-ology recommends that OPH, as part of *Policy Area #4: Addressing Racism*, include improving the City of Ottawa’s WPVHP to better deal with diversity related challenges in the workplace and develop a custom-designed reporting system for microaggressions and incidents of racism and oppression.**

## Evaluating Existing Action Plans and Recommending New Initiatives

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<sup>4</sup> [https://laws-lois.justice.gc.ca/eng/acts/h-6/section-3.html#:~:text=3%20\(1\)%20For%20all%20purposes,which%20a%20pardon%20has%20been](https://laws-lois.justice.gc.ca/eng/acts/h-6/section-3.html#:~:text=3%20(1)%20For%20all%20purposes,which%20a%20pardon%20has%20been)

A review of the numerous action plans associated with *Policy Area 4, Addressing Racism*, reveals that almost 50% of them have to do with training that is mostly related to education about racism for employees at the leadership, managerial and staff levels. Some action plans include the creation of webinars, providing staff with opportunities to attend outside training, and encouraging quarterly discussions about racism, oppression, and discrimination at various team-level meetings.

A second area is outreach which includes (1) creating an anti-racism webpage and content and resources around gender, race, equity, and indigeneity as well as resources to support discussion facilitation around racism and oppression, (2) sharing with staff the various learning and feedback opportunities that exist at OPH around Anti-Racism / Anti-Oppression, including a calendar of events, (3) sharing OPH's commitment and work in the area with partner agencies in the community; and (4) encouraging, supporting and sharing the findings of partner-led research on racism and discrimination.

The third area has to do with reviews and discussion, which includes supporting the formal review of various policies for equity and inclusion.

These action plans will undoubtedly help OPH move along its anti-racism / anti-oppression journey; they also acknowledge the need for staffing, planning, resourcing, and time commitments. However, what is missing is a more strategic approach to addressing racism that is comprehensive and where action plans build on one another to create a roadmap for change. In principle, this requires (1) understanding the state of the union at OPH when it comes to DEI successes and challenges; (2) a more bespoke approach to training; (3) road-mapping change in terms of DEI at the unit level, led by leaders of each unit; and (4) measuring progress around the road map. Each of these is described below in Figure 3.

**FIGURE 3: FROM INFORMATION TO TRAINING TO ROADMAPS FOR CHANGE**

Phase 1	Understanding the state of the union at OPH when it comes to DEI successes and challenges	This would require a multi-method approach to understanding the strengths and weaknesses of OPH's current approach to DEI. This would likely require a survey tool completed by staff and community members and a safe space and process for storytelling intended to capture DEI stories across the organization. This would also require a review of existing cross-organizational policies to evaluate how well they reflect OPH's DEI ideals; this work has begun in the current Audit.
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Phase 2	Developing a bespoke approach to training	The learnings from Phase 1 would inform future content in OPH's iLearn Primer, which is an effective vehicle to educate staff about Anti-Racism and Anti-Oppression. However, actionable training is missing, i.e., training that will result in real change. When an organization relies on generic training about discrimination and racism, the result can be excellent insights into the topic areas. However, what is often left untouched is how these insights apply to the organization and how they could be used to generate change. The stories collected in Phase 1 could serve as case discussions in a more bespoke training effort to set the stage for real change at OPH.
Phase 3	Roadmaps to Change	DEI challenges such as representation, equity, or creating an empowering organizational culture are not easy to solve. Regardless of complexity, driving effective change is unlikely to come from training, whose purpose is to drive awareness. Instead, change is driven by implementation plans and actionable initiatives. This requires understanding DEI challenges, creating buy-in around the need to fix those challenges, and developing roadmaps with timelines, resources, and responsibilities. This process only works when it is owned by a senior manager. OPH must invest in consultation resources to help business units or service delivery areas develop these roadmaps and then have someone on the SLT hold implementation to account.
Phase 4	Measuring Change	OPH must create cross-organizational buy-in around measures that demonstrate the progression of its Anti-Racism / Anti-Oppression Policy and then track progress. These measures will be vastly informed by Phases 1 to 3.

**Strat-ology recommends that OPH strive to develop roadmaps to address racism and discrimination for each of its major service areas, i.e., community-facing and internally facing.**

One clear gap from a policy and action plan perspective in *Policy 4, Addressing Racism*, is highly tangible initiatives dedicated to “dismantling colonial systems that persist in 2021”<sup>5</sup>. This requires two elements. First, OPH must establish a reporting system for microaggressions and incidents of racism and

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<sup>5</sup> Report: Reconcili-Action at Ottawa Public Health, September 9, 2021

oppression. Second, OPH must be willing to design bold structures and processes to move the DEI dial at the organization.

**In designing a reporting system, Strat-ology recommends that OPH respect the following key tenets:**

- (1) There must be a formal system of reporting that is clear, simple, and well-communicated throughout OPH.**
- (2) Reporting must involve more than one listener. Listeners must include the direct supervisor and a DEI Planning & Implementation Team member. When the issue is with the supervisor, one of the listeners must be another person in a management position in a different team.**
- (3) Individuals reporting the incident can invite a colleague whose job is to listen and provide support.**
- (4) When incidents are reported, the process and timeline for investigation and evaluation must be clearly followed and include the individual making the report.**
- (4) The decision to progress a complaint must be made by the supervisor, the individual making the complaint and the member of the DEI Planning & Implementation Team, and**
- (5) There must be an option for informal reporting where the incident is shared with an outside consultant, whose job it is to collect and summarize DEI related stories at OPH.**

The dismantling of systemic discrimination in organizations requires not only understanding the state of DEI but also designing and implementing bold policies and action plans. These are missing in OPH's Anti-Racism / Anti-Oppression Policy. Organizations that take DEI seriously are beginning to exhibit boldness in creating policies and implementation processes that tangibly, immediately, and measurably deal with the lack of DEI in their organizations. Examples include (1) requiring that 50% of all new hires across levels must be from equity-deserving groups, (2) not allowing hiring panels to move forward without ensuring that at least 50% of potential interviewees come from equity-deserving groups, etc., (3) Identifying 20 to 30 percent of key positions in management that must be filled with individuals from equity deserving groups over the next 3 to 7 years. The process and outcomes of these bold initiatives are highly measurable and tend to result in much more immediate outcomes. **Strat-ology recommends OPH identify, elaborate and implement at least one bold diversity related initiative as part of its *Policy Area 4, Addressing Racism*.**

## Auditing Policy Area #5: Reducing Disparities

### Evaluating the Contents of the Policy and Action Plan and Recommending Changes

*Policy Area #5: Reducing Disparities* rightfully asserts a pivotal role for data in reducing health disparities in various communities in Ottawa. Sociodemographic data (SSD) help senior leaders envision the scope and location of health equity disparities. The documentation around SSD collection policies and procedures is strong and well thought out, providing key information on the kinds of questions to include training for those asking the questions, rules around data storage, data access, communication and reporting around the data, compliance issues, as well as ensuring clients understand the purpose

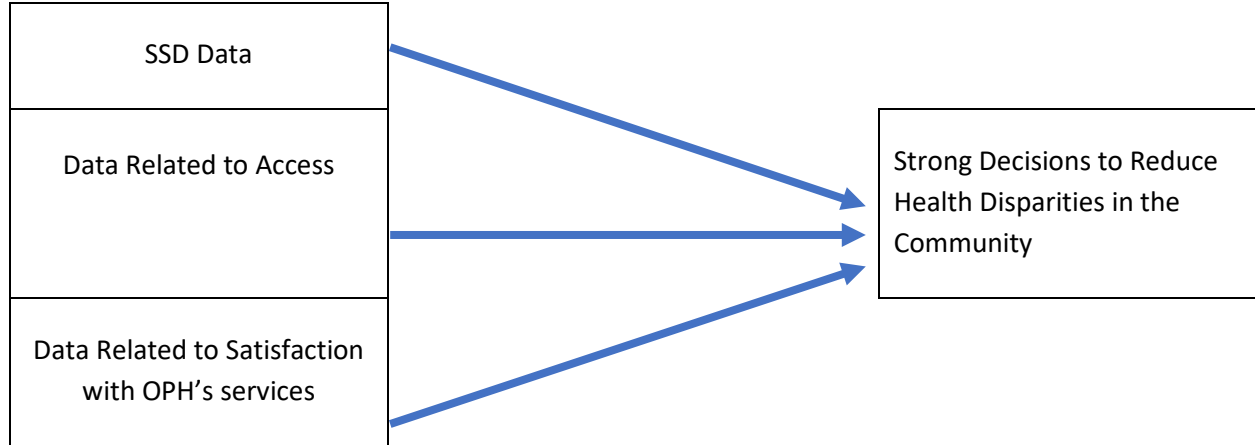
and use of the data. The need for an SSD Analysis Framework is mentioned in “The Collection, Use, and Disclosure of Sociodemographic Data Policy;” however, this framework is not presented. Data collection intends to drive evidence-based decision making. To this end, a strong policy statement related to reducing health disparities must consider two key questions: (1) Does the method and those involved with SSD analysis affect decisions and, therefore, outcomes around health disparities? And (2) Is collecting and analyzing SSD data enough to drive down health disparities?

SSD is collected at the various contact points between the community and OPH. This data allows OPH to understand how individuals from different income levels, races, genders, etc., access OPH services.

**Strat-ology suggests two recommendations to improve the wording of Policy Area #5: Reducing Disparities. First, if the analysis focuses on gaps, it risks becoming biased. It must also focus on areas of success. Second, the individuals analyzing the data and drawing inferences must have lived experiences that capture the intersectionalities present in SSD data.** For example, suppose service access is very low among transgender community members who struggle with housing and stable employment. How to use that data to drive decision making must be considered by a set of analysts and decision makers with lived experience in housing, transgender issues, and underemployment. Without this level of representation among those analyzing and interpreting the data, it risks being interpreted in inaccurate ways and may lead to less well-informed decision-making, i.e., decisions grounded in data but not evidence, as evidence is when judgment is used to interpret data.

However, it’s also important to ask: Is collecting and analyzing SSD data enough to drive down health disparities? SSD is useful in outlining the incidence, location, and size of health disparities in the community. However, it does not provide information such as which services meet community members’ needs, their level of satisfaction with such services, and their willingness and ability to access these services. This data is important because it informs key questions directly linked to reducing health disparities, such as: How aware are different communities of various OPH initiatives? How important is language as a deterrent to awareness and access? Does cultural competence among OPH service providers influence community engagement? How prevalent are microaggressions, racist incidents, and discriminatory practices in community services? How do they affect community engagement? Does the current set of services meet the needs of diverse communities? This type of access and satisfaction data is pragmatic and useful for reducing health disparities. Although this is briefly discussed in OPH’s *Fact Sheet: Health Outcomes*, it is not included in OPH’s Anti-Racism / Anti-Oppression Policy. This additional data is crucial in driving decisions that can effectively reduce health disparities because it improves decision-making (see Figure 4). Therefore, **Strat-ology recommends that OPH collect access and satisfaction type data from various communities in the City related to its services over the next two years.**

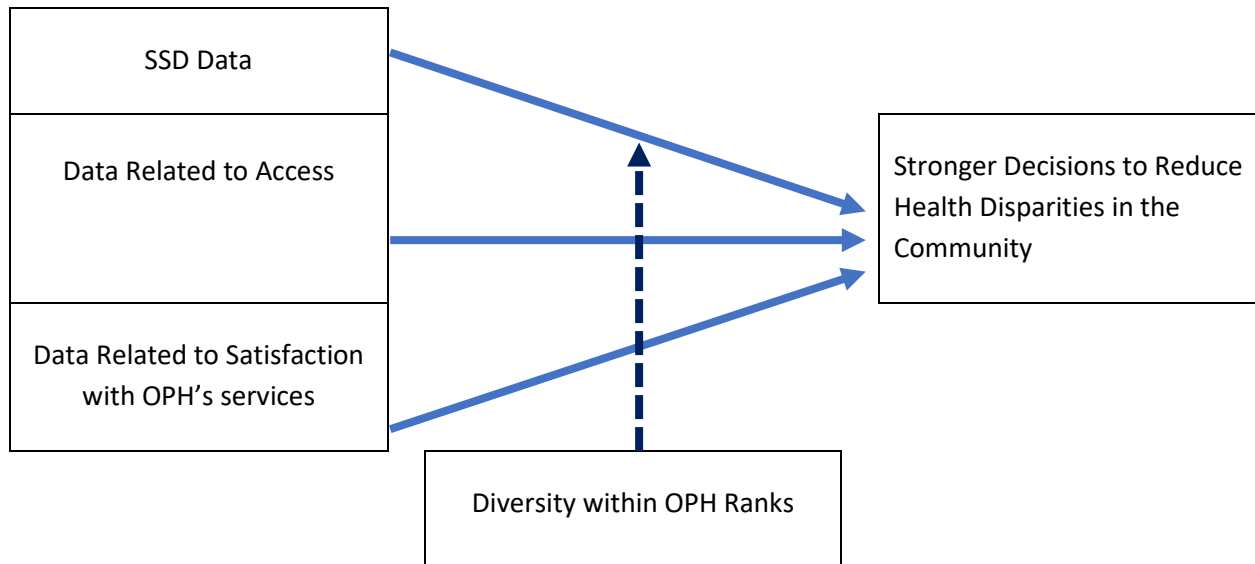
**FIGURE 4: DATA THAT HELPS REDUCE HEALTH DISPARITIES IN THE COMMUNITY**



The approach to data collection in *Policy Area #5: Reducing Health Disparities* is focused on community-based data. However, one must consider the following question: Can OPH effectively minimize health disparities in the community without tackling diversity and representation internally? Research has repeatedly shown that diversity within an organization's employment ranks increases performance and innovation<sup>6</sup>. **Strat-ology suggests that to reduce health disparities in the community, OPH must drive diversity within its ranks because sociodemographic data, data related to access, and data related to satisfaction with OPH's services drive stronger decision-making around health disparity reduction when those working with the data are more diverse (see Figure 5). Creating a higher correlation between diversity in-house at OPH and in the community is key to reducing health disparities and should be a key element of *Policy Area #5: Reducing Disparities*.** This step is crucial before sharing and co-analyzing the data with the community members.

<sup>6</sup> <https://www.weforum.org/agenda/2019/04/business-case-for-diversity-in-the-workplace/>

**FIGURE 5: DIVERSITY - MODERATING THE LINK BETWEEN DATA AND ITS ROLE IN REDUCING HEALTH DISPARITIES IN THE COMMUNITY**



## Auditing Policy Area #6: Contributing to Population Health

### Evaluating the Contents of the Policy and Recommending Changes

*Policy Area #6: Contributing to Population Health* is well thought out, committing OPH to two key goals. The first goal is relevance. This is achieved by engaging in a periodic review of OPH's policies, programs, and practices to ensure they meet the needs of Indigenous, African, Caribbean, Black, and other racialized populations. The second goal is inclusion. This is achieved by encouraging and supporting activities and programs by various communities in Ottawa to help spread the word and sometimes participating in events classified as cultural events and anti-stigma and anti-discriminatory forums. Both goals of the policy are intended to build bridges. **Strat-ology recommends delineating both goals clearly in the description of the policy.**

The gap in this policy area is that it treats all communities within the region as equally interested, capable, and resourced when organizing community events and meetings around themes of anti-racism and anti-oppression. This may be a reasonable assumption for communities that are well established in the region, who have strong organizing infrastructures, and healthy levels of fundraising to support community-based events. However, this assumption may actually marginalize smaller under-resourced communities, often also left behind by governmental programs. **Strat-ology recommends that OPH include reaching out to small and under-resourced community groups in Ottawa as a key part of *Policy #6: Contributing to Population Health*.**

Another facet of this policy that may benefit from some exploration is what communities do to promote health within their own infrastructures beyond event organization. For example, some communities

have groups of health professionals committed to conducting community-based research and developing complex community development strategies to promote health across various populations. **Strat-ology recommends that OPH allocate resources to understand these initiatives across communities present in Ottawa. This knowledge will allow OPH to be more surgical in its approach to improving population health in the community.**

Finally, measurement is an important theme not represented in *Policy #6: Contributing to Population Health*. Measuring population health requires identifying macro-variables considered hallmarks of population health improvement. These macro-variables need to be tailored to different communities' current health status to measure health effectively. The resulting insights will positively influence health improvement. Therefore, **Strat-ology recommends that this policy include the need to develop measures of population health that reflect the health status and development needs of different communities in the Ottawa region.**

### Evaluating Existing Action Plans and Recommending New Initiatives

To achieve better public health outcomes, OPH sees its primary activity as one dedicated to helping support planning and mobilizing internal teams to effectuate change. To this end, OPH, in its current Anti-Racism / Anti-Oppression Policy, states it will (1) engage external partners, including community groups and government, around health promotion and track their activities; (2) mobilize its internal community engagement teams in different service areas to effectuate on-the-ground influence; and (3) encourage and support research on the impacts of racism and discrimination on population health. These are well-thought-out action plans to operationalize *Policy #6: Contributing to Population Health*.

**Based on the policy recommendations suggested above, Strat-ology recommends the following additions to the set of action plans for *Policy #6: Contributing to Population Health*. First, OPH must make sure that it considers working with new partners in its action plans and institutionalizes a process to develop new partnerships that increase its community engagement. Second, OPH must explore the depth and breadth of its reach on a community by community basis.** Although the Community Engagement Team has made inroads, engagement remains one of the biggest challenges at OPH. Currently, OPH has enough engagement with communities to be aware of some of their challenges (See Figure 6). This awareness results in a baseline level of engagement that improves as teams visit the communities more frequently. This frequency affords OPH's front-line staff a window to health-related challenges and how other challenges, especially those related to DEI, moderate health outcomes. In working with different communities in Ottawa, OPH finds itself in Quadrants 1 and 2 in Figure 6. However, ideally, over the next 3 years, OPH would develop its community outreach to the point that allows it to have significant levels of dialogue with various communities resulting in the co-creation of services that better meet the community members' needs. This will require maintaining, enhancing, and resourcing OPH's community engagement teams to strategically and methodically build road maps that will deepen not only their relationships in the communities they serve but also their ability to encourage higher levels of engagement from community leaders and members.

**FIGURE 6: CONTINUUM OF COMMUNITY ENGAGEMENT**

Long-Term			Quadrant 3: Dialogue to co-create relevant services
Medium-Term		Quadrant 2: Sharing of DEI related nuances faced by the Community	
Short-Term	Quadrant 1: Awareness of Issues		
	Trust Required: Low	Trust Required: Medium	Trust Required: High

Measurement is key to operationalizing *Policy #6: Contributing to Population Health*. Therefore **Strat-ology recommends that OPH develop (1) a set of macro and community-specific measures to understand the status of population health, (2) a set of measurable, macro and community-specific development goals related to the improvement of health outcomes, and (3) a funded and resourced process to measure health outcomes.**

## Auditing Policy Area #7: Reporting and Evaluating to Drive Improvement

### Evaluating the Contents of the Policy and Recommending Changes

*Policy Area #7: Reporting and Evaluating to Drive Improvement* recognizes that for reporting and evaluation to drive improvement, themes such as data safety and the involvement of the SLT and BOH are important. However, this policy area would benefit from a clearer description of the actual policies around reporting and evaluation. To achieve this clarity, the policy should speak to six key questions, all of which are grounded in measurement. These questions are: (1) Is collecting DEI data for OPH's community engagement efforts equally important as collecting DEI data about diversity and representation inside the organization? (2) What is the intent of DEI-related data collection? (3) Is it important to collect data on diversity, equity and inclusion inside OPH? This data will likely be qualitative and quantitative. (4) Will all data being collected be the result of formal collection efforts, or will various stakeholders have the opportunity to voice DEI concerns across the OPH organization and the communities it serves? And (5) Will an annual report on Anti-Racism / Anti-Oppression be produced to celebrate OPH's DEI-related progress? **Strat-ology recommends that OPH draw from the recommendations in this Audit to discuss these questions to provide more context to *Policy Area #7: Reporting and Evaluating the Drive Improvement*. Strat-ology suggests that these discussions may result in changes to the wording of *Policy Area #7: Reporting and Evaluating to Drive Improvement* to reflect ideas such as (1) Formal and periodic quantitative data collection will provide a progress report on DEI within OPH's organization and in its dealing with the community; (2) Formal and periodic qualitative data collection, in the form of case studies, will provide insights into how instances of**

racism can be handled and how systems need to change to ensure higher levels of DEI at OPH; and (3) Data collection will help OPH evaluate new structures and processes intended to improve OPH's DEI related outcomes; the policy must outline a commitment to a system that evaluates data and make recommendations for change.

### Evaluating Existing Action Plans and Recommending New Initiatives

The action plans speak to (1) creating safe spaces for incident reporting, (2) ensuring employees have a current understanding of incident and complaints reporting processes, (3) ensuring disaggregated equity data is collected from various populations within Ottawa, including data collected from equity-deserving groups; and (4) producing a report that provides information on staff composition, DEI related challenges at OPH, and patterns of systemic racism observed within the organization. Although these actions are important, there remain gaps in fully operationalizing *Policy #7: Reporting and Evaluating to Drive Improvement*. To achieve the intent of this policy, OPH will have to spend time and resources to develop a DEI dashboard that requires the collection of pivotal DEI data from within its organization and the communities it serves. The dashboard data must enable OPH to answer key questions such as (1) Are we doing a better job representing and reflecting Ontarians across the organization and at various employment levels? (2) Is senior leaders' understanding of, and engagement with DEI issues facing OPH both within and outside the organization improving? (3) Are we improving our ability to address racism and oppression at OPH? (4) Is our interaction and influence among equity-deserving communities in Ottawa increasing? (5) Is the health of equity-deserving populations improving? **For OPH to sustainably collect the data that will populate this dashboard, Strat-ology recommends investing in a design process and a funded research team of expert DEI researchers from within and outside OPH.** It is imperative that this dashboard measure not only diversity but also equity and inclusion, as this dashboard will be OPH's barometer to determine the progress it is making in operationalizing its Anti-Racism / Anti-Oppression Policy. To help OPH determine the appropriate set of qualitative and quantitative measures to track its progress in terms of diversity, equity and inclusion, Strat-ology provides the following suggestions.

### Measuring Diversity

Measuring diversity boils down to counting the number of employees from EDGs: (1) at OPH overall, (2) at the various leadership levels, (3) in internal and externally facing teams, and (4) who are permanent employees. This data would be ideally gathered every 4 months to support DEI-related decision-making.

### Measuring Equity

The level of equity at OPH could be captured by collecting the following data: (1) % of employees from EDGs in Leadership Positions vs. Staff Positions; (2) the average time it takes for Employees from EDGs to transition from temporary staff to permanent staff vs. other employees; (3) the number of new hires from EDGs that are hired into permanent positions vs. other hires; (4) the number of employees from EDGs who get to participate in career developing opportunities vs. other employees; (5) the number of employees from EDGs who feel they are being actively mentored by leaders vs. other employees; (6) the number of employees from EDGs who feel they are being actively mentored by leaders vs. other employees; (7) the



number of incidents that felt inequitable reported by employees from EDGs; and (8) the number of acting positions that have been given to members of EDGs vs other employees. Equity is also measured by the number of employees from EDGs who feel they have equal access to being hired, being promoted, career development, and opportunities for growth at OPH. This data would be ideally gathered every 4 months to support DEI-related decision-making.

## Measuring Inclusion

Measuring inclusion requires measuring (1) the level of transparency around hiring and promotion at OPH, (2) the number of teams at OPH that have taken a more tokenistic approach to hire people from EDGs vs. a more critical mass approach, (3) the number of multilingual positions, (4) how much members of EDGs on different teams feel their voice and contribution matters to the work of the team, (5) how included they are in designing and implementing the team's future strategy, (6) how included they are in key decisions facing the team, and (7) how involved the community is in co-creating services. This data would be ideally gathered every 4 months to support DEI-related decision-making.

Producing and populating a dashboard with key measures around diversity, equity, and inclusion is key to setting the stage for strong strategies, actions, and initiatives to reduce racism and discrimination at OPH. However, in addition to a dashboard, OPH needs to establish a structure that has the ability to use the dashboard to clarify strategies, develop action plans, prioritize between options for progress, and monitor progress in terms of implementation and outcomes. Establishing a DEI Planning & Implementation Team that reports to a Senior Leader who sits on the Senior Leadership Team vs. a Health Equity/Anti-racism Workgroup are strong ways to ensure OPH's Anti-Racism / Anti-Oppression Policy and Strategies are being developed and implemented across the organization and the community. This group would follow a process similar to the Strategy Renewal Steps outlined in OPH's "Protecting our Community's Health: 2022 Strategic Action Plan Refresh".

## Responsibilities

OPH's current Anti-Racism / Anti-Oppression Policy ends by suggesting key roles of staff employed at various levels at OPH, including senior leadership team members, program managers, supervisors, OPH employees, learners and volunteers. This list of responsibilities attempts to outline who is responsible for implementing the actions that flow from OPH's Anti-Racism / Anti-Oppression Policy. In reviewing this list, Strat-ology also consulted the list of responsibilities put forward in the City of Ottawa's Equity and Diversity Policy. Some of the responsibilities are shared by employees across different organizational levels, including (1) supporting an environment free of racial discrimination and racism; (2) reporting incidents of racial discrimination or racism experienced or witnessed; (3) participating in training and development around racism and discrimination; (4) participating in data collection efforts related to DEI; (5) refraining from engaging in any practices of racial discrimination or racism; and (6) being familiar with OPH's Anti-Racism / Anti-Oppression Policy and the City Workplace Violence and Harassment Policy and Procedures.

When these cross-organizational responsibilities are removed from the list, it is no longer clear what each level of management at OPH is specifically responsible for when it comes to DEI. Whether you are a member of the SLT at OPH or a front-line staff member, each has shared responsibilities and very specific responsibilities when it comes to DEI. Some of those responsibilities are related to changing how you think about DEI. Others are about taking action when it comes to DEI. Figures 7, 8 and 9 are Strategy's attempt to help OPH define DEI-related responsibilities at different levels of management.

**FIGURE 7: IMPLEMENTING OPH'S ANTI-RACISM / ANTI-OPPRESSION POLICY**  
**RESPONSIBILITIES FOR SENIOR MANAGERS**

	<b>Getting into the Details</b>	<b>Big Picture</b>
<b>Thinking</b>	<i>⌘ Be willing to engage in problem identification &amp; problem-solving when faced with complex, chronic, &amp; systemic DEI challenges within OPH at all levels of the organization &amp; when working with equity deserving communities. ⌘ Take ownership of OPH's DEI challenges &amp; developing solutions.</i>	<i>⌘ Work closely with the DEI Planning &amp; Implementation Team, the Health Equity/Anti-racism Workgroup, the Diversity Advisory Council &amp; the OPH Group for Indigenous and Racialized Employees to develop, vet, &amp; add to OPH's Anti Racism / Anti Oppression Policy &amp; Action Plans.</i>
<b>Doing</b>	<i>⌘ Signal the importance of an environment free of racial discrimination by engaging with DEI challenges at all levels of OPH by leading or co-leading key projects &amp; initiatives. ⌘ Ensure DEI is objectively discussed when strategies are being set &amp; implemented throughout the organization. ⌘ Promote &amp; monitor the implementation of OPH's AO/AR Policy. ⌘ Ensure DEI progress is being measured.</i>	<i>⌘ Promote OPH's AO/AR Policy. ⌘ Design &amp; oversee DEI- motivated changes to OPH's operations &amp; service delivery systems. ⌘ Allocate financial &amp; human resources to support OPH's AO/AR Policy &amp; implementation by building individual capacity &amp; organizational roadmaps to improve DEI across the organization.</i>

**FIGURE 8: IMPLEMENTING OPH’S ANTI-RACISM / ANTI-OPPRESSION POLICY**  
**RESPONSIBILITIES FOR MIDDLE MANAGERS**

	<b>Getting into the Details</b>	<b>Big Picture</b>
<b>Thinking</b>	<p><i>⌘ Design &amp; manage systems, processes, &amp; initiatives to facilitate (1) the reporting of DEI issues &amp; (2) decrease discrimination at OPH by designing and implementing projects and programs. ⌘ Participate in bespoke training around DEI that leads to the development of roadmaps to generate measurable DEI-related change.</i></p>	<p><i>⌘ Provide input into OPH’s Anti Racism / Anti Oppression Policy &amp; Action Plans. ⌘ Serve as a bridge between the SLT &amp; front-line staff in terms of the range of DEI challenges being faced &amp; managed.</i></p>
<b>Doing</b>	<p><i>⌘ Ensure employees are making strong use of the educational opportunities around DEI at OPH. ⌘ Oversee DEI data collection. ⌘ Implement roadmaps for greater inclusion. ⌘ Participate in the thorough, confidential, &amp; objective investigation of racial discrimination allegations &amp; the swift implementation of formal &amp;/or informal remedies. Be prepared to provide facilitated discussion services where appropriate.</i></p>	<p><i>⌘ Ensure DEI principles at OPH are upheld during hiring &amp; promotions. ⌘ Create a safe space to discuss DEI challenges in the department &amp; develop a roadmap for greater inclusion. ⌘ Work to develop a safe reporting and accommodation process related to DEI.</i></p>

**FIGURE 9: IMPLEMENTING OPH’S ANTI-RACISM / ANTI-OPPRESSION POLICY**  
RESPONSIBILITIES FOR FRONT LINE STAFF

	<b>Getting into the Details</b>	<b>Big Picture</b>
<b>Thinking</b>	<i>⌘ Help to develop the detailed work practices that will operationalize the systems, processes, &amp; initiatives at OPH designed to decrease discrimination</i>	<i>⌘ Push ideas up to managers around improving diversity, equity, &amp; inclusion at OPH &amp; in how it serves various communities in the City.</i>
<b>Doing</b>	<i>⌘ Commit to implementing work processes carefully, conscientiously and equitably to improve diversity, inclusion &amp; equity at OPH. ⌘ Work in a way that respects diversity &amp; upholds the values of equity &amp; inclusion in the workplace.</i>	<i>⌘ Identify &amp; share the DEI challenges employees face at OPH, and the community faces in receiving services ⌘ Report barriers to equal opportunities.</i>

For OPH to turn the dial on DEI, it must have the right structures and processes in place and have staff who have the capacity and capabilities to realize the behaviours outlined in Figures 7, 8, and 9. What is clear from the interviews Strat-ology conducted during the Audit process is that most employees at OPH, including those in various levels of leadership, don’t feel prepared to manage DEI-related challenges. Figure 10 presents a continuum of DEI capacity and capability.

**FIGURE 10: CONTINUUM OF DEI CAPACITY AND CAPABILITY**

Quadrant 1	Quadrant 2	Quadrant 3	Quadrant 4	Quadrant 5
Staff has participated in some online training, with many not trained.	Staff has participated in in-person or real-time facilitated training that was custom designed to meet OPH’s DEI needs.	Staff has participated in building roadmaps for change to influence DEI positively.	½ of the staff have lived experience when it comes to DEI.	Staff have lived DEI experience and professional experience in dealing with DEI issues.

LOW ←————→ HIGH  
 CAPACITY & CAPABILITY TO DESIGN &  
 IMPLEMENT DEI RELATED ACTION PLANS

Interviews revealed that OPH's staff and leadership fall into Quadrant 1, with some falling in Quadrant 2. Without strong experiential training that is then leveraged to build roadmaps for change and with these roadmaps being designed and implemented by a diverse set of staff and management, OPH will struggle to implement many of the recommendations presented in this Audit. However, by training staff more experientially and then allowing them to build road maps for change will help OPH staff rise to the occasion.

## APPENDIX A: Documents Reviewed for OPH's Anti-Racism / Anti- Oppression Policy Audit

1. Anti-Racism/Anti-Oppression Workplace Reference number: 1.63.0,
2. OPH Anti-Racism/Anti-Oppression Policy Year One Action Plan (September 2021 – September 2022),
3. City of Ottawa: Workplace violence and harassment policy,
4. OPH Anti-Racism/Anti-Oppression Action Plan Priorities – 2021 - 2022, and a review of the following 15 documents:
5. City of Ottawa: Workplace Violence and Harassment Policy,
6. Anti-Racism Secretariat City of Ottawa: Factsheet: Health Outcomes,
7. Anti-Racism Secretariat, City Of Ottawa: What We Heard Report: Findings From External Consultations - September 2021,
8. Protecting Our Community's Health: 2022 Strategic Action Plan Refresh,
9. Ottawa Public Health's Strategic Plan For 2019-2022 - Annual Refresh for 2022 - Submitted To Ottawa Board Of Health,
10. OPH Reconcili-Action Plan,
11. A Snapshot Of Reconcili-Action At OPH,
12. Reconcili-Action At Ottawa Public Health: A Time To Reflect, Re-Fresh And Reinforce Commitment - Submitted To Ottawa Board Of Health,
13. Anti-Racism Secretariat, City Of Ottawa: What We Heard Report: Findings From Internal Consultations Anti-Racism Secretariat, City Of Ottawa - September 2021,
14. City of Ottawa: Equity and Diversity Policy,
15. Departmental Diversity and Inclusion, Outreach and Recruitment (DI/OR) Plan Template: Strategic Planning Tool - Year 2021,
16. Ottawa Board of Health: Motion Notice of Motion: Racism as a Public Health Issue,

17. OPH: The Collection, Use and Disclosure of Sociodemographic Data Policy,
18. OPH: The Collection, Use and Disclosure of Sociodemographic Data Procedures, and
19. City of Ottawa: Recruitment and Staffing Policy.

## APPENDIX B: Summary of Recommended Policy Changes & Action Plans

Existing policy themes & action plans are in black font. Recommended changes are in blue font.

POLICY CONTENT		ACTION PLANS
<b>#1: Identifying Clear Accountability</b>		
<i>Anti-racism lens on strategies &amp; action plans + BOH Alignment with Anti-Racism / Anti-Oppression Policy</i>	<i>Emphasis on SLT accountability + quantitative &amp; qualitative data to deal with incidental + systemic racism</i>	DEI Staff Resources - Health Equity / Anti-Racism / Anti-Oppression Steering Committee  DEI Structure & Team Grounded in the SLT
<b>#2: Ensuring Ontarians are Reflected &amp; Represented within OPH</b>		
<i>Ensuring equitable access to employment + advancement</i>	<i>Forward-looking definition of representation + working with the City to drive DEI at OPH to dismantle systemic discrimination</i>	Align hiring practices to increase representation + Hiring Checklist to minimize bias + Partnership with the Community + Mentorship  HR System Review & Roadmap for Change working with City + Full Mentorship Process
<b>#3: Including &amp; Engaging Key Internal &amp; External Voices at OPH</b>		
<i>Include diverse voices via partnerships + language + imagery accessibility</i>	<i>Storytelling + Counsel + Elders' consultation + engaging marginalized communities</i>	Acknowledge Cultural Events + Improve HR Practices  Case Writing to Capture the State of DEI + Diversity Advisory Council + Elders' Community Focus Groups + Partnership Building System
<b>#4: Addressing Racism</b>		
<i>Recognize + Challenge Racism</i>	<i>Organizing to change discriminatory systems &amp; practices via new processes &amp; structures</i>	Training + Web Resources + DEI Discussion Forums + Policy Review  DEI Innovation Challenge + Experiential Training + Roadmaps for Change + Safe Reporting Mechanisms for incidental & systemic discrimination
<b>#5: Reducing Disparities</b>		
<i>Socio Demographic Data Collection</i>	<i>SSD + Data that captures equity &amp; inclusion</i>	SSD Data Collection  Data related to: User Access + User Satisfaction + User Experience & a framework for analysis & decision making
<b>#6: Contributing to Population Health</b>		
<i>Reviewing programs &amp; policies + being present in the community</i>	<i>Focus on underserved + the voiceless + deepen ties with the community to understand their efforts around health equity</i>	Engage external partners to support health promotion + mobilize community engagement + support research that explores the link between racism, discrimination & population health  Data-driven, macro & community by community Health Status Report + Roadmaps to increase community engagement from awareness to co-developing & implementing solutions



#7: Reporting & Evaluating to Drive Improvement		
Reporting & evaluation drive change	<i>Data-driven decision-making is key to driving change</i>	Safe space for incident reporting + SSD collection + Annual Report on the Status of DE <a href="#">Measuring D - E - I to create a DEI Dashboard</a>

## APPENDIX C: Ontario Health's Equity, Inclusion, Diversity, and Anti-Racism Framework

