



## **REVIEW OF THE GEORGE BROWN HUMAN RIGHTS, DISCRIMINATION AND HARASSMENT (HRDH) POLICY**

### **DRAFT CONSULTATION REPORT DECEMBER 2025**

#### **1. INTRODUCTION**

The Office of Anti-Racism, Equity, and Human Rights Services (OARERHS) at George Brown Polytechnic (GBP) began a review of the Human Rights, Discrimination and Harassment (HRDH) Policy in the fall of 2025 (Policy Review). The current version of the HRDH Policy has a mandatory revision date of March 31, 2026, based on its scheduled review period.

GBP's Policy Development and Review Framework Policy outlines the requirement for community consultation based on GBP's Community Consultation Protocol ("Consultation Protocol"). The Consultation Protocol requires that a Community Consultation Report be prepared and shared with the wider GBP community in an accessible manner.

This Community Consultation Report ("report") summarizes the process, outcomes, and recommendations from the community consultation conducted by the OAREHRS in November 2025. OAREHRS received and collected community feedback through focus groups, one-on-one interviews, and an online survey.

The report highlights key recommendations based on the data collected through the community consultation process, indicating how this information will be incorporated into the next stages of the Policy Review process.

OARERHS would like to thank everyone who came forward and participated in the community consultation. The feedback and insights shared with the OAREHRS will be very helpful in ensuring the HRDH Policy continues to reflect the values and needs of the GBP community.

#### **2. POLICY REVIEW STRATEGY AND PROCESS**

##### ***BACKGROUND***

Between Fall 2024 and January 2025, the HRDH Policy underwent an interim review process as a response to Bill 166, the *Strengthening Accountability and Student Supports Act, 2024*, which required all post-secondary institutions to strengthen their approaches to addressing racism and hate through policy and practice. The Ministry of Colleges, Universities, Research Excellence and Security ("MCURES") issued a Ministry Directive in September 2024 outlining specific requirements for all post-secondary institutions to implement by January 31, 2025.

Although GBP's HRDH Policy was already quite robust, an interim review was conducted to incorporate additional requirements outlined by the Ministry, including updates to procedures

and the inclusion of more detailed language regarding proactive mechanisms to address racism and hate and create more inclusive learning and working environments. Interim revisions were made to the HRDH Policy in consultation with key partners across the institution, with a commitment to the community that comprehensive community consultations would be held as part of the policy review process in 2025-26.

The HRDH policy review process is composed of the following stages:

1. OAREHRS internal policy review
2. Institutional Policy Review and Environmental Scan (conducted by external consultant)
3. GBP Community consultation
4. Drafting the Consultation Report
5. Drafting the revised HRDH policy and procedures
6. Legal review of draft policy and procedures
7. Approval of the draft revised HRDH policy and Consultation Report by the Board of Governors
8. Publication of the approved revised policy and Consultation Report
9. Educating the GBP Community on the revised HRDH Policy.

At the outset of the policy review process, an advisory committee made up of various GBP units and departments was set up to help guide and provide feedback to the OAREHRS through each stage of the process. The Advisory Committee consists of:

- Associate Vice-President, OAREHRS
- Digital Planner, Communications
- Director, Human Rights Services, Sexual Violence Response and Complaint Resolution, OAREHRS
- Director, Indigenous Strategy and Senior Advisor on Indigenous Relations
- Director, Office of Student Conduct and Support
- Director, Public Safety and Emergency Management
- Director, Student Well-being and Support
- Executive Director, HR Consulting and Employee Experience
- General Legal Counsel
- Human Rights Advisor, OAREHRS
- Senior Manager, Equity, Complaints and Investigations, OAREHRS
- Senior Manager, Safety and Wellness

#### **a. Environmental scan**

The environmental scan highlighted where GBP's current HRDH Policy required additional clarity and/or revisions to meet best practice and prepare for evolutions in human rights discourse, including more detail on purpose, definitions, jurisdictional coverage, procedures, and roles and responsibilities of GBP departments and offices. The environmental scan also explored opportunities to ensure that the HRDH Policy offers robust pathways to complaint resolution, including early resolution/intervention, alternative resolution, Indigenous conflict resolution and investigation.

The Advisory Group provided valuable strategic guidance on the policy review strategy, the community consultation process and recommendations, and the review of the draft policy and procedures.

## **b. Consultation Process and Strategy**

The community consultation process involved proactive outreach efforts to build awareness of and interest in the Policy Review process. The community consultation began on November 7, 2025, and concluded on November 21, 2025.

Information about the community consultation was disseminated to the Polytechnic community through various communication channels, which are listed below. OAREHRS also asked stakeholders to reshare this information with their networks.

The community consultation process included:

- An online survey open from November 7 to 21, 2025.
- Focus groups with George Brown Polytechnic community members between November 13-20.
- One-on-one meetings with OAREHRS' key partners on November 17.

For employees, the outreach for the community consultation process included:

- Communications sent to senior leadership to be cascaded to their respective teams.
- Communications through the GBP community website, GBP community weekly newsletter and e-digest.
- Communication and continuous promotion using OAREHRS and other GBP social media channels.
- Direct communication to stakeholder groups such as the Black Student Success Network, Indigenous Initiatives, employee union leadership, Senior Human Resources Consultants, Office of Student Conduct and Support team, Student Success and Student Life, etc.
- For students, the consultation process included:
  - Communications in the weekly Student Communications newsletter.
  - Communication and continuous promotion using OAREHRS and other GBP social media channels.
  - Emails to multiple student groups such as international students, Indigenous students, Black students, and the GBP Student Association, etc.

The survey, focus groups, and one-on-one meetings all followed the same format, using similar questions with a focus on how to improve the HRDH Policy and the complaint resolution process (e.g.: considering accessibility, inclusion, trauma-informed approach, transparency, and fairness); the supports and resources available to participants in a complaint resolution process; and data collection and reporting to support transparency and accountability. An opportunity to provide any other comments was made available at the end of the survey, focus group or interview.

Focus groups were held with employees, students, and stakeholders on the dates reflected in the chart below. Student participants in focus groups received \$25 Amazon gift cards to compensate them for their time. OAREHRS's Senior Manager, Equity, Complaints and Investigations and Human Rights Advisor facilitated focus groups discussions and one-on-one meetings, with the OAREHRS work placement student providing notetaking support.

Recognizing that asking questions about discrimination and harassment can trigger harm for people, the information provided to the participants included links to contact details for internal GBP support services and additional external support services.

Below is a table summarizing the community consultation activities facilitated by the OAREHRS between October and November 2025:

<b>Date</b>	<b>Activity</b>
October 29	Advisory Committee meeting
November 13	Three focus groups with faculty, students and administrative staff
November 14	Two focus groups with support staff and students
November 17	Three interviews with representatives of Black Futures, Black Students Success Network, disability and accommodation services, accessible learning services, student residence
November 20	Three focus groups with administrative staff, faculty and support staff
November 24	Advisory Committee meeting

### **c. Participants and community stakeholders**

In total, forty-four (44) community members participated in consultations, in addition to the Advisory Committee members.

#### ***Survey***

Eleven (11) individuals responded to the survey:

<b>Participants</b>	<b>Responses</b>
Students	6
Faculty	2
Administrative staff	1
Support staff	2

#### ***Focus Groups***

Twenty-eight (28) individuals attended focus groups:

<b>Participants</b>	<b>Attendees</b>
Students	10
Faculty	6
Administrative staff	3
Support staff	9

#### **Interviews**

We held three (3) one-on-one interviews with five (5) participants, four of whom were GBP employees and one an employee of a third-party providing services to GBP.

## **Advisory Committee**

Members of the Advisory Committee provided input on the consultation process, including the areas of focus for the consultation questions and suggestions for proactive outreach to the GBP community to encourage participation.

### **3. CONSULTATION FEEDBACK ON THE HRDH POLICY**

#### **a. General feedback**

Several participants expressed appreciation for the work of the OAREHRS, and its efforts to improve the HRDH Policy and related procedures to make them more equitable, inclusive and trauma informed. At the same time, all participants identified areas for improvement of both the HRDH Policy and the complaint resolution process. The responses received most frequently across all questions focussed on the interrelated needs for greater policy clarity, improved process transparency, and more awareness-building among community members.

Many participants recommended the following:

- the HRDH Policy language should be simpler, plain (not legalistic), accessible) and avoid jargon and hard to understand terms.
- Information needs to be provided in accessible non-technical language, and be available in summary and alternative formats, including for persons with disabilities and those who speak English as an additional language.
- Complex terms and concepts need clear definitions and explanations made available in alternative formats (i.e. poster, videos, etc.).

Most participants provided feedback that the description of the complaint resolution process in the HRDH Policy is unclear and lacks transparency, which may create a significant barrier to reporting or filling a complaint; and may leave individuals involved in the process feeling unsupported. They noted that the language used is opaque, and that there are many parts of the process that require descriptions that are both more detailed and more straightforward, and that the process itself requires simplification. They identified a particular need for clarity around timelines, and around early resolution and alternative dispute resolution options.

Feedback received through the community consultation process also seemed to indicate a general lack of awareness and understanding of the HRDH Policy and associated processes, the role of the OAREHRS, and the specific supports and resources available to community members wanting to engage with the HRDH policy and processes. Participants consistently suggested that more effort needs to be spent on awareness-building and information-sharing across the community, through training and innovative outreach mechanisms.

The following sections focus on responses to questions (see Appendix A) organised by theme. Input provided by more than one participant across the survey, focus group discussion and interviews is highlighted, but it is important to note that all feedback has been reviewed and considered by the OAREHRS as part of its comprehensive HRDH Policy review process.

#### **b. Accessibility, Fairness and Responsiveness of the Complaint Resolution Process**

Participants were asked to reflect on the complaint resolution process as described in Sections 8 to 11 of the HRDH Policy, and to recommend ways that OAREHRS can make the process

more accessible, fair, and responsive to the needs of all community members. Of the many useful comments and suggestions received, the following points were mentioned most often:

- Ensure that all community members are aware of the policy, the role of OAREHRS, and the support and resources available. (X6)
- Consider tabling, human resources info-sessions, an improved website and periodic emails.
- Clarify timelines in the policy, and where possible find ways to shorten timelines. (X9)
- Clarify and make more transparent all processes in the policy (or in a separate document) and improve the straightforwardness of the process. (X4)
- Additional specific requests for clarification and streamlining included:
  - - Clarify information about possible interim measures and decision-making (who makes the decision, who is consulted, what the outcome could be etc.) (X3)
    - Clarify and streamline internal avenues for complaints, including having multiple pathways (online, in person, by phone) to file a complaint, and provide clear information on external avenues for filing complaints. (X4)
    - Provide additional information on supports available (X2) including through the student association and spaces for equity-deserving groups on campus.
- Provide any policy or process related information in accessible, plain, clear, non-technical language. (X2) Provide information in alternative formats (videos, etc.) for persons with disabilities, those who speak English as an additional language, and others.
- Improve communication throughout the complaint resolution process, and provide regular updates throughout the process, including reassuring the complainant that their matter is being dealt with and taken seriously. (X2)
- To support a more trauma-informed approach, consider developing consistent scripts and training for those outside the OAREHRS who may receive complaints and/or reports about discrimination and/or harassment as defined by the HRDH Policy. (X2)

### **c. Trauma-Informed and Anti-Oppressive Practice in the Complaint Resolution Process**

Participants were asked to reflect on and provide feedback on how the HRDH Policy can be strengthened to be more trauma-informed and anti-oppressive, with a particular focus on promoting enhanced safety for the parties, creating opportunities to make informed choices and decisions, and balancing power dynamics during a complaint resolution process.

The following points were mentioned most often:

- Clarify the processes in the HRDH Policy, and during engagement with the complaint resolution process for all involved. (X8) This should include clarifications of the safeguards in place to protect complainants/witnesses against reprisals, who is involved in the process, and how decisions are made
- Consider adding a 'pre-consultation' phase where a community member can receive information on the process and their options and get support without triggering a complaint process.
- Provide information in accessible, plain, clear, non-technical, friendly language. (X7)
- Consider developing and disseminating videos and graphics to explain processes and complex concepts.
- Consider ways of making the complaints resolution process and decision-making more sensitive to power dynamics, including between students and faculty/staff, between staff and supervisors, and between full-time and part-time faculty. (X3)

- Clarify intersectionality within the HRDH Policy. Ensure human rights advisors create spaces where power is equalized. Reinforce that the HRDH Policy and processes are about protecting community members, not GBP.
- Emphasize high levels of communication throughout the process with the parties. (X2)
- Clarify language around the complainant's agency within the process and role in decision-making about resolution options, interim measures, and support resources. (X2)
- Ensure that the OAREHRS advisors/team reflects the diversity of the GBP community. (X2)
- Provide ongoing training to the OAREHRS response team and others within GBP to build the capacity for trauma informed and anti-oppressive practices. (X2)

#### **d. Barriers to Filing Complaints and Potential Solutions**

Participants were asked to reflect on the main barriers to filing a complaint about harassment or discrimination. Survey participants received a list of options to review, while focus group and interview participants reviewed the list after providing their initial reflections. While all barriers on the list were acknowledged as important, and several others mentioned, the main barriers identified were:

- Fear of not being treated fairly, lack of trust in the process or the organization, or a perception that the organization is trying to cover itself (X14)
- Fear of retaliation / reprisal (X12)
- Lack of clarity and transparency of process and pathways (X8)
- A general fear about coming forward with a complaint due to not knowing what to expect (X7)
- Not wanting to get the person in trouble (X5)
- Length of process (X5)
- Power dynamics/imbalance (X5)
- Fear of impacts on academic standing or employment (X3) including fears of loss of scholarship or loss of family investment in education
- Not knowing about resources and support available (X3)
- Trauma from a previous experience (X3)
- Sense of overwhelm due to an exhausting process with heavy procedures (X3) particularly if bounced around between different departments
- Fear of stigma or not being believed (X3)
- Fear of victim blaming (x2)
- Lack of certainty that it will lead anywhere or be resolved to their satisfaction (X2)
- Fear that a complaint is triggered as soon as they speak to someone (X2)
- Cultural stigma, or a cultural context of not making complaints (X2)
- Fear of lack of confidentiality (X2) including fear that any interim measures may expose the issue to community
- Concerns about facing the respondent on campus or during the process (X2)

Participants were also asked to brainstorm possible solutions to overcome these barriers. Many helpful suggestions were received, including:

- Build awareness of the OAREHRS, the HRDH Policy and the complaint resolution process among staff and students. (X10)
- More explicitly, participants indicated that OAREHRS should consider:

- being more student-facing and make information more accessible and engaging;
  - exploring different ways of disseminating information on key concepts, including through social media;
  - creating videos;
  - joining events run by other GBP bodies;
  - training and engaging community members as peer mentors to provide general information on the policy or process; and,
  - sharing information with first-year students before they arrive on campus.
- Provide clear communications on steps and timelines for the complaint resolution process, and streamline the process where possible (X3) Additional specific requests for clarification included:
    - The role of confidentiality and its limitations (X2)
    - The anonymous complaint process and implications (X2)
    - The duty to report
    - what constitutes reprisal (provide examples) and what are protections against reprisal
    - early and alternative resolution options
    - How an affected party can access counselling
  - Provide multiple channels to bring forward a concern (X2) e.g. phone; online easy-to-access and user-friendly intake form; more office hours for in-person drop-in; virtual discussion via a support person where potential complainant could remain off-screen (if they wish to remain anonymous).

#### e. Restorative and Remedial Approaches to Human Rights Complaint Resolution

Participants were asked to reflect on the forms of alternative dispute resolution and restorative justice practice that might be appropriate to resolve human rights complaints. They were provided definitions of key approaches to consider.

- **Mediation:** A discussion between the parties facilitated by an impartial mediator that may result in a mutually agreeable resolution.
- **Impact statement/letter:** A written or oral statement by the Complainant to the person who caused them harm.
- **Facilitated dialogue:** A discussion between the Complainant and the person who caused them harm facilitated by an objective third party from within the Polytechnic community.
- **Education:** The person who caused harm may agree to participate in education and training related to human rights, discrimination, and harassment.
- **Restorative Justice:** Processes such as those listed above, and including processes such as accountability circles and community conferencing, specifically where those who have done harm and stakeholders are actively engaged in understanding what happened and the impact of a harmful situation on the Complainant and/or the

Several participants (X4) thought that all the approaches presented are appropriate, but more participants (X8) noted that while all might be useful, it is context dependent. They noted that whether any or all the approaches are appropriate depends on the severity, clarity and nature of the complaint; for example, some people noted that formal investigations may be required in cases of sexual violence/harassment, or where there are multiple allegations against a single person. Participants also noted that the approach depends on the agreement and comfort level of all parties, including the willingness to face each other, and what the complainant is looking for through the process.

Where participants called out specific forms of alternative dispute resolution, they most often mentioned restorative justice (X13), mediation and facilitated dialogue (X12), and education (X11). Impact letters were specifically mentioned less often (X4).

#### **f. Supports and Resources for Community Members**

Participants were asked to reflect on the types of supports and resources that would be most helpful for individuals going through a complaint resolution process, whether complainants, respondents, witnesses or decision-makers. Many helpful suggestions were received, with the most mentioned supports and resources including:

- A clear and transparent list of steps, processes and pathways, and clear timelines, were considered as a support in itself (X11) This includes
  - a simple, accessible, jargon-free version of the HRDH Policy and/or process, with information on what to expect, rights and responsibilities, and information on protection from reprisal, available on the website and via various other platforms.
- Access to counselling for students (X9) and the Employee and Family Assistance Program for staff (X2), including “fast-track” access to counselling and warm referrals made with the person’s consent.
- Consistent, frequent check-ins that are embedded in the process, support navigating the process with a single point person (X7)
- Peer support throughout process (X4)
- Support from the Student Association, Office of Student Conduct and Support, or union where relevant (X3)

#### **g. Data Collection, Reporting and Community Accountability**

Participants were asked to reflect on the type of information that they felt would be useful for the OAREHRS to collect and report back to the GBP community, and the kinds of annual updates or reports that would be meaningful or useful to them and their communities. They were asked to consider the need to protect confidentiality and psychological safety, the intention to reflect the lived experiences of those most impacted by discrimination and harassment, the importance of supporting the identification of systemic patterns, trends and inequities, and the intention to build trust in the complaint resolution process.

Participants recognized that it can be a difficult balance between confidentiality and transparency, and that it can be difficult to control narratives once statistics and other data have been released. With these points in mind, participants noted a large range of data that it would be useful to collect and disseminate through different internal forums.

Data points most often mentioned include:

- Trends in the nature of complaints (X12). What protected grounds or issues were brought forward as complaints (E.g. discrimination based on anti-Black or other forms of racism, gender or gender identify discrimination / misogyny, ageism, family status, disability including lack of accommodation). Who was involved in each complaint (e.g. between students, between employees, between students and employees, etc.)?
- How many complaints/reports were received? (X8)
- What are the trends in demographics (X7) of complainants and respondents? Using community-accepted language, including information such as the proportion of complainants who identify as racialized, Indigenous, having a disability, 2SLGBTQIA+; the proportion of complainants from different ethnicities; and the proportion of complainants who live in residence.
- What were the outcomes of complaints (X3) and proportion of parties satisfied with the outcome of the complaint resolution process? (X5)
- What were the actions taken by GBP to address the complaints directly and implement any improvements in the complaint resolution process?
- Has there been a change in the GBP culture, as a result of complaint processes and/or community feedback? (X4)
- How many complaints were addressed informally or through alternative dispute resolution rather than a full investigation (X3)
- What were the number of complaints by department / programme (X3)? Would it be possible to identify environments or contexts that foster a toxic climate, to enable the institution to implement preventive measures and targeted interventions before issues escalate?
- How many complaints were found to be substantiated and how many were not and how many were found to be in scope of the HRDH Policy vs out of scope? (X2)
- What has been the degree of satisfaction with the length of the complaint resolution process (X2) What were the methods used to report incidents (X2)?
- What were the methods used to report anonymous complaints?
- What were the themes and patterns of anonymous complaints?

#### **4. HRDH POLICY CHANGES AND RATIONALE**

Following the community consultation and the input received from the Advisory Committee, OAREHRS, supported by external counsel and the institutional working group undertook a comprehensive redrafting of the Human Rights, Discrimination and Harassment Policy (HRDHP) and developed a separate Procedures document, included as Appendix 1 to the HRDHP. The revisions are designed to make the HRDHP more accessible, transparent, trauma- and violence-informed, and procedurally fair, while ensuring continued alignment with the Ontario Human Rights Code, the Occupational Health and Safety Act, the Ministry of Training, Colleges and Universities Act, and the September 2024 MCURES Anti-Racism / Anti-Hate Directive.

Where appropriate, this section traces specific changes to the community feedback summarized in Section 3 above and to the legal and best-practice drivers identified through the environmental scan. Not every concern raised through the consultation requires a policy change; many are addressed through operational practice, education and outreach, and the strengthened Procedures. The structural changes captured below are organized into ten thematic areas.

### **a. Plain-language drafting and a clearer structure**

Across all participant groups, the most consistent feedback was that the previous HRDH Policy was opaque, jargon-heavy, and inaccessible to community members who were not policy specialists. The revised HRDHP has been rewritten in plain language, with reduced legal terminology, clearer section organization, and definitions consolidated into a single Defined Terms table for ease of reference. The Policy and Procedures are formally separated, with the Procedures included as Appendix 1, allowing community members to engage with the institutional commitment in the Policy and to refer to the Procedures for the operational steps. Together, these changes respond directly to the consultation feedback that the description of the complaint resolution process “is unclear and lacks transparency” and that information must be “provided in accessible non-technical language.”

### **b. A clearer, staged complaint resolution framework**

The revised HRDHP and Procedures introduce a clearer, staged complaint resolution framework. Where appropriate, OAREHRS may take proportionate Early Intervention measures to address concerns informally before, or as an alternative to, initiating a formal complaint resolution process. Where early intervention is not appropriate or does not resolve the concern, two formal complaint resolution pathways are available: Alternative Resolution (including mediation), impact statements and letters, facilitated dialogue, education, and restorative practices or Investigation and Decision-Making. The Procedures also formalize the circumstances in which OAREHRS may act as the Complainant, including where there is credible information of a breach in the public realm, where action is required to address risks to the safety, well-being or integrity of the learning, working or living environment, where investigation is required by law, where significant power imbalances exist between the parties, or where the complaint is anonymous. This responds to consultation feedback identifying the need for clearer pathways, as well as recognition that some complainants may be unable or unwilling to come forward directly because of fear of retaliation, power dynamics, or the cumulative weight of barriers identified in Section 3(d).

### **c. Strengthened procedural fairness commitments**

The revised HRDHP and Procedures codify the procedural fairness commitments that govern every complaint resolution process. These include written notice of allegations through a Notice of Complaint and Summary of Allegations; the right of the Respondent to a written response; sharing of responses across the parties as appropriate; an impartial investigator; written decisions with reasons; and a defined three-stream appeals architecture (collective agreement processes for unionized employees; appeal to the Vice President, People and Culture for non-unionized employees; and appeal to the Provost for students). A bias-challenge mechanism allows either party to raise concerns regarding a conflict of interest or reasonable apprehension of bias of the assigned Responsible Administrator within three (3) business days of receiving the Notice of Completion. Where confirmed, an alternate Responsible Administrator with no prior involvement will be appointed. These changes respond to feedback that participants required clearer information about “who makes the decision, who is consulted, what the outcome could be,” and to broader consultation themes around fairness and trust in the process.

### **d. Trauma- and violence-informed practice as a structural commitment**

Trauma- and violence-informed practice is articulated in the revised HRDHP as a guiding principle, not a supplementary consideration. The Policy commits to mandatory training in trauma- and violence-informed practices for all OAREHRS staff, investigators, and Responsible Administrators involved in the complaint resolution process. The Procedures formalize the right of complainants, respondents, and witnesses to invite a support person to meetings at any step of the process; establish ongoing communication obligations between OAREHRS and the parties throughout the process; and recognize that complainants, respondents, and witnesses may carry pre-existing trauma that may be activated during a complaint resolution process. The Policy also recognizes that trauma may originate from prior institutional contact, and that trauma-informed practice means informed, supported, and clearly explained participation at every stage. These provisions respond directly to the consultation feedback under Section 3(c).

#### **e. Equity, anti-racism, and intersectionality structurally embedded**

The revised HRDHP names anti-Black racism, anti-Indigenous racism, antisemitism, Islamophobia, and harm experienced by 2SLGBTQIA+ communities, women, and persons with disabilities in its introductory framing. Intersectionality is defined as the experience of discrimination or harassment on more than one (1) protected ground and is recognized in the guiding principles. The HRDHP also articulates that an equity-informed complaint resolution process “does not mean treating parties identically” and includes consideration of a person’s social location to address power imbalances that may create barriers to participation. Restorative practices are framed as stemming from Indigenous traditions, as framed and defined by members of the Indigenous Initiatives team who sat on the advisory committee or informed management. Together, these provisions respond to consultation feedback on intersectionality, power dynamics, and the need to clarify the policy’s anti-oppressive orientation, and to the requirements of Bill 166 and the MCURES Anti-Racism / Anti-Hate Directive.

#### **f. Interim measures**

The revised HRDHP includes an explicit framework for interim measures. Interim measures are temporary, non-disciplinary, and implemented without prejudice to the outcome of the complaint resolution process. They are triggered only after a preliminary assessment establishing reasonable necessity and are designed to support the safety and well-being of the parties and to protect the integrity of the process. Examples include no-contact directives, separation of the parties, changes to residence arrangements, adjustments to employment reporting structures, changes to class enrolments, modifications to the learning, living or work environment, and temporary adjustments to schedules, duties, or access to certain spaces. OAREHRS will take reasonable steps to minimize the impact of interim measures on respondents, and a breach of an interim measure may itself constitute a breach of the HRDHP. This section responds to consultation feedback identifying the need for clarity on “possible interim measures and decision-making”, and to concerns raised about confidentiality and exposure during interim periods.

#### **g. Anonymous complaints, multiple intake channels, and clearer pathways**

The revised HRDHP and Procedures introduce an explicit anonymous complaint mechanism, supported by a dedicated anonymous complaint form and email channel. Where an individual chooses to remain anonymous, OAREHRS will limit the collection and use of identifying information and will include anonymous reports in institutional reporting in a manner that protects

confidentiality. Multiple intake channels are formalized, including written submission by email, in-person or virtual meeting with a Human Rights Advisor, attendance at the OAREHRS office, or submission with the assistance of an Advisor. Designated receiving offices; OAREHRS, Public Safety and Emergency Management, People and Culture, the Office of Student Conduct and Support, and Counselling and Student Well-being are explicitly identified in the Policy as resources able to provide information and support, with referral to OAREHRS for the filing of complaints. These provisions respond to consultation feedback on barriers to filing, including “a general fear about coming forward” and the request for “multiple channels to bring forward a concern,” as well as to the MCURES Directive’s requirements on anonymous complaints.

#### **h. Clarified roles and decision-making authority**

The revised HRDHP clarifies the roles and responsibilities of all parties to the complaint resolution process. OAREHRS is named as the impartial process owner of the HRDHP, expressly described as operating “impartially and not as an advocate for any party.” The Responsible Administrator is the decision-maker, with appointment governed by the relationship of the Respondent to the institution: the Dean is normally the Responsible Administrator where the Respondent is a faculty member, instructor, or teaching assistant; the Responsible Administrator is one (1) level above the Respondent’s direct supervisor where the Respondent is a staff member; and the Associate Vice-President, Student Success is the Responsible Administrator where the Respondent is a student. The Policy also clarifies the responsibilities of Senior Administrators, Managers, and Supervisors; Senior Human Resources Consultants; the Office of Student Conduct and Support; and Placement Organizations and Vendors. These changes respond to feedback that the previous Policy did not provide enough clarity around “who is involved in the process, and how decisions are made.”

#### **i. Enhanced data governance and annual reporting**

The revised HRDHP commits OAREHRS to the collection and reporting of expanded data on complaints and the complaint resolution process. The annual report is provided to the Board of Governors and to the Ministry of Colleges and Universities, and is published on the GBP website with appropriate confidentiality protections. The reported information includes a summary of OAREHRS activities and initiatives; the number of complaints reported and observed trends; the type of complaints; the number of complaints not proceeding to investigation; the number resolved through informal or early intervention; the associated Code-protected ground or grounds; intersectionality; response and resolution times; investigation findings; and law enforcement involvement. Anonymous complaints are included in aggregate; complaints that may identify individuals who came forward and wished to remain anonymous are excluded from reporting. These commitments respond to the consultation feedback summarized in Section 3(g) on community accountability and the institutional balance between confidentiality and transparency, as well as to the Bill 166 and MCURES Directive requirements on annual reporting.

#### **j. Strengthened education, prevention, and community awareness**

The HRDHP commits OAREHRS to developing an anti-racism, anti-oppression, and human rights education strategy, including training, programs, and events accessible to all GBP community members. Training topics will include human rights and freedom of expression; rights and responsibilities under the HRDHP; the complaint resolution process and how to access support; trauma- and violence-informed responses to complaints and investigations; and bystander

intervention. Specific decision-maker training will address procedural fairness, counteracting bias, and trauma- and violence-informed practice. The HRDHP will also be aligned with the Polytechnic's Sexual Harassment and Sexual Violence Policy and Freedom of Expression Policy. The education plan will be reviewed every five (5) years, coinciding with the HRDHP review cycle. These commitments respond directly to the most consistent message from the consultation: that more work is required on awareness-building, education, and outreach to ensure community members know what the Policy provides, where to go for support, and how to access the complaint resolution process when needed.

#### **k. Feedback addressed through operational practice rather than policy change**

Some consultation feedback is addressed through operational practice, training, or other institutional commitments rather than through the text of the HRDHP itself. This includes feedback that the OAREHRS team should reflect the diversity of the GBP community; that consistent intake scripts and training should be developed for staff outside OAREHRS who may receive disclosures; that information should be made available in alternative formats (videos, graphics, posters); and that more proactive outreach is needed for first-year students. These commitments are reflected in the implementation and education planning that will follow approval of the revised HRDHP, and will be reported on annually in accordance with Section 9 of the Policy.

## **5. CONCLUSION**

The comprehensive review of the Human Rights, Discrimination and Harassment Policy is the result of a collaborative process that engaged community members, the Advisory Committee, external and internal counsel, and OAREHRS staff over the course of 2025. The community consultation, while acknowledged as smaller in scale than OAREHRS would have wished, surfaced a consistent set of themes that have substantively shaped the revised HRDHP and its Procedures. The most clearly expressed concerns; plain language and accessibility, process clarity and transparency, trauma- and violence-informed practice, intersectionality and power dynamics, alternative and restorative resolution pathways, and community accountability through transparent reporting, are reflected throughout the revisions described in Section 4 above.

OAREHRS recognizes that policy revision is one part of a longer institutional effort. The strongest policy in the world produces little change if community members are unaware of it, do not trust it, or do not see it operationalized consistently. The phased education and awareness rollout that will follow Board of Governors approval is therefore as important as the Policy itself. OAREHRS commits to continuing the conversation with the GBP community through the rollout, through annual reporting, and through the next cycle of community consultation when the HRDHP comes up for its scheduled review.

OAREHRS extends its sincere appreciation to every community member who participated in the consultation — by completing the survey, attending a focus group, sitting for a one-on-one interview, or contributing through the Advisory Committee. The honesty, courage, and constructive spirit of these contributions made this review meaningfully different from a policy revision completed in isolation. The revised HRDHP and its Procedures are stronger because of the GBP community's engagement, and OAREHRS looks forward to continuing this work together.