



Walking the Talk:

An Open Letter on the Canadian Human Rights Commission's implementation of the Clerk's Call to Action on Anti-Racism, Equity and Inclusion

To the Clerk of the Privy Council and Secretary to the Cabinet, to our colleagues across the federal public service, to fellow human rights defenders in Canada, and to all people in Canada:

The time for action to address systemic racism and discrimination, and ensure the full inclusion of people with disabilities in all facets of our society is long overdue. As Canada's human rights watchdog and national human rights institution, the Canadian Human Rights Commission is more determined than ever to not only be a strong voice for human rights in Canada, but also a leader in advancing anti-racism, equity and inclusion across our various roles — as a human rights advocate, a human rights service provider and regulator, and as a federally regulated employer.

In the past year, the Canadian Human Rights Commission has bolstered our existing work to advance equality for all, because effecting meaningful and lasting change means we must all “walk the talk.” We have been privileged over the past year to be invited to share our progress and lessons learned with other organizations in Canada that are looking for positive models on how to build their own inclusive workplace cultures and create lasting transformation. The key to the success of this work is that it be never-ending. It must be continuous, it must be evergreen, and it must be sustainable. Ultimately, we want our anti-racism, equity and inclusion efforts to outlast any one leader, any one individual at the Commission.

With all that in mind, this Open Letter presents a snapshot of the ongoing efforts we are carrying out to meet the highest standards of anti-racism, equity and inclusion, and is organized under the six key themes you identified in your guidance letter:

1. **Actions:** How has our approach to advancing anti-racism, equity and inclusion changed over the past year, and what are we doing differently that is having a practical impact? Of the nine actions presented in the Call to Action, where have we focused the most attention?
2. **Measurement and results:** How are we measuring progress, what are the results telling us, and how has this informed our actions?
3. **Challenges and barriers:** What setbacks, challenges and barriers to progress have we faced in implementing the Call to Action, and what are we doing to overcome them?
4. **Employee response:** How have we partnered with our employees to implement the Call to Action? What have their reactions been to the actions we have taken, and how are we supporting this work in our organization?
5. **Momentum:** To sustain momentum and continue our support for public service renewal, how do we plan to focus our work over the coming year, including in a post-pandemic world? What are our priorities?

6. Data annex: Relevant data that demonstrate our progress in increasing representation, including of Indigenous peoples, Black and other Racialized employees, and people with disabilities among our workforce.

1. Our actions

Over the past year, Canada has experienced a reckoning on the issue of systemic racism. The impact of COVID-19 on long-standing, pre-existing inequalities and systemic barriers for Indigenous peoples, and Black and other Racialized people in Canada, along with events south of our border and here at home, have led to a nationwide wake-up call about the effects of systemic racism and discrimination in society.

In the wake of the killing of George Floyd just last year, Marie-Claude Landry, Chief Commissioner of the Canadian Human Rights Commission, did not mince words when asked on live CBC television whether systemic racism and discrimination also exist here in Canada. Chief Commissioner Landry was emphatic that “yes, systemic racism and discrimination exist in Canada, and the belief that there is little to no racism in Canada is itself a barrier to addressing it.”

The events of the past year have prompted organizations across the country, including the Commission, to recommit ourselves to advancing anti-racism, equity and inclusion. At the Commission, we built upon the work we started several years ago to examine our own processes and operations from an anti-racism and inclusion perspective. We have taken a closer look at how racism and implicit bias may influence our processes, our decisions and the way we serve people in Canada to position us to “walk the talk” to advance anti-racism, equity and inclusion within and outside our organization.

To read more about our ongoing anti-racism work, please visit the [Anti-Racism Work section of our website](#), read the [first draft of our Anti-Racism Action Plan](#), or consult the first in a series of [Commission Progress Reports](#) on our anti-racism work. The updated version of our Anti-Racism Action Plan will be published in September 2021.

Here are some of the highlights:

Call to Action 1: Appoint Indigenous employees and Black and other Racialized employees to and within the Executive Group through career development and talent management

- We appointed a Racialized senior executive to support the Chief Commissioner and the Executive Director in championing sustainable anti-racist organizational change within the Commission. This executive has worked closely with Commission employees and management at all levels, as well as with bargaining agents, central agencies and other Government departments and agencies, to consolidate and articulate our anti-racism work under our Anti-Racism Action Plan. She also attends weekly senior management meetings comprising Branch heads, the Chief Commissioner and the Executive Director to bring an anti-racism lens to our work. This individual also meets at least once weekly with the Chief Commissioner and the Executive Director to maintain accountability and ensure continued momentum.
- We continue to appoint Indigenous peoples, Black and other Racialized people, and people with disabilities to the senior ranks of our organization.
- We are ensuring diversity in the composition of the Commission's hiring boards.

Call to Action 2: Sponsor high-potential Indigenous employees and Black and other Racialized employees to prepare them for leadership roles

- We are supporting and participating in a Mentorship+ program.
- We are exploring the possibility of collaboration with other small agencies and human rights organizations to expand the number of mentors available to employees both at the Commission and within those agencies.
- We are working with employees to identify the learning needs, career goals and areas for improvement necessary for success in their current positions, as well as opportunities for career advancement.
- We are granting training opportunities that are required for an employee's current position and/or for their career advancement to the extent that operational and budgetary constraints allow.

Call to Action 3: Support the participation of Indigenous employees and Black and other Racialized employees in leadership development programs (for example, the Executive Leadership Development Program) and career development services (for example, official language training)

- We are supporting the leadership development of Indigenous, Black and Racialized employees, as well as employees with disabilities and those with lived experience of disability, by offering acting opportunities and supporting official language training.

Call to Action 4: Recruit highly qualified candidates from Indigenous communities and Black and other Racialized communities from across all regions of Canada

- We are increasing the ratio of advertised staffing processes vs non-advertised appointments to allow a greater diversity of people to compete for employment opportunities, including acting opportunities of 4 months or more.
- We are ensuring that the use of non-advertised appointments does not act as a barrier to employment or advancement of equity-seeking people.
- We are reaching out to relevant equity-seeking communities and stakeholders where gaps exist in representation and/or no Indigenous, Black or Racialized candidates apply to an opportunity at the Commission.
- We are advocating for the implementation of recruitment strategies that are free from bias and seek to attract diverse candidates as part of the selection process for Governor in Council appointments to the Commission.
- We are promoting awareness of Governor in Council appointment opportunities with stakeholder networks and social media followers, through an intersectional lens.
- We are recruiting from across Canada.

Call to Action 5: Committing to personally learning about racism, reconciliation, accessibility, equity and inclusion, and fostering a safe, positive environment where these conversations are encouraged throughout our workplaces

- We have adopted the mantra “Listen, Learn, Act, Repeat” across the Commission to help guide our anti-racism, equity and inclusion work.
- To encourage ongoing dialogue on anti-racism, we developed an Anti-Racism Action Plan that reflects our commitment to anti-racist action both within and outside the organization in our role as an employer, a service provider and regulator, and as a human rights advocate. The Action Plan, the [first edition](#) of which was published in January 2021, resulted from an organization-wide evaluation of our structure and processes, and incorporates feedback from employees, unions, stakeholders and consultants. It is a comprehensive, evergreen, foundational document that is guiding our ongoing anti-racism efforts. The ultimate goal of the Action Plan is not to tick items off a to-do list, but rather, to ensure that anti-racism efforts are embedded permanently into the very fabric of our core operations as an employer, as a service provider and regulator, and as a human rights advocate. Our [first progress report](#) was published in June 2021, and the second edition of the Action Plan will be published in September 2021.
- We have supported ongoing learning and self-awareness initiatives and activities, including by:
 - Purchasing a book on anti-racism for every Commission employee.

- Providing Commission-wide training to staff and Commissioners, which has increased awareness and discussion about implicit bias, systemic racism and discrimination, and the impacts of racism, colonialism, the Residential Schools and trauma. Such training opportunities have included a half-day session on “Avoiding Harm when Discussing Racism,” delivered to all staff in 2021, and a half-day session on “The Four Pillars of Trauma Engagement,” delivered to management and those involved in addressing human rights complaints.
- Providing specialized training and tools for Commission staff responsible for screening, analyzing and addressing discrimination complaints that allege racism, including training on how to take a trauma-informed approach to engagement with victims.
- Regularly sharing ongoing research by the Commission’s Library Services, as well as relevant media scans by the Commission’s Communications Division with Commission staff to provide the most up-to-date anti-racism literature, articles, tools, events and other resources available to enhance staff competencies in understanding and addressing racism in the workplace, and supporting a diverse and inclusive work environment.
- Developing a comprehensive learning roadmap that will outline mandatory and exploratory training for all employees, students and Commissioners.
- We are fostering an environment of accountability by embedding anti-racism, equity and inclusion commitments in Executive Performance Accords. Similarly, we are fostering an environment of inclusion by embedding anti-racism and equity principles in the work objectives of employees.
- We are fostering inclusive leadership by promoting awareness of major religious and spiritual observances, and encouraging management to schedule important engagements around those dates.

Call to Action 6: Combatting all forms of racism, discrimination and other barriers to inclusion in the workplace by taking action on what we have learned, empowering employees to speak up about bias and oppression, and better equipping managers to address these issues

- We have redoubled our efforts as a credible and influential national voice for human rights by speaking out against hate, intolerance and racism. We have used our various platforms to help ensure that the truth about systemic racism and discrimination in Canada remains part of the public debate. Some key examples of our advocacy on this issue include:
 - The Chief Commissioner’s public statement following the 2019 federal election, “[New Parliament Must Confront Racism in Canada.](#)”
 - The Chief Commissioner’s participation in the 2020 Meeting of Federal, Provincial and Territorial Ministers Responsible for Human Rights, at which she highlighted the disproportionate impact of COVID-19 on marginalized groups, and the need for action to dismantle systemic racism in Canada.

- The Chief Commissioner’s [various statements during 2020](#) of the impacts of COVID-19 on Racialized communities.
 - The Commission’s co-hosting the 2020 national virtual conference on “Confronting racism and addressing human rights in a pandemic,” together with Anti-Racism Secretariat of the Department of Canadian Heritage. The conference was attended by over 3,500 online participants and informed a final [summary report](#).
 - The Chief Commissioner’s various public speaking engagements in 2020 at which she addressed an array of virtual audiences, usually of 50 or more people, on the human rights impacts of the pandemic.
 - The Chief Commissioner’s engagements with staff and executives from various federal departments, boards and tribunals to speak about the impact of implicit bias on decision-makers, and to share the Commission’s experiences and lessons learned as we set out to create sustainable anti-racist organizational change.
 - The Chief Commissioner’s various media engagements on the issue of systemic racism in Canada, including CTV’s Power and Politics with Evan Solomon, CBC News Hour with Rosemary Barton, and CPAC’s Primetime Politics with Peter Van Dusen.
- We have engaged with, listened to and learned from Commission employees, as well as a diverse community of stakeholders on the kinds of changes and improvements we need to continue to make to our discrimination complaints process and our internal operations. For example:
 - We held a [Dialogue Session with Representatives from Racialized Communities on Advancing Racial Equality in Canada in March 2020](#) to inform improvements to our discrimination complaints process. The session served as a forum at which participants shared their concerns with the effectiveness of the human rights complaints process for race-based complaints, and helped generate ideas about what the Commission can do to ensure that human rights complaints and the mechanisms that support them remain a viable tool to advance racial equality in Canada.
 - We have made changes to our complaint services process to improve the way we screen and analyze complaints alleging racism, and ensure that discrimination complaints that warrant a hearing by the Canadian Human Rights Tribunal proceed to that stage.
 - We launched a project to retroactively collect and analyze disaggregated data from past complaints files on the grounds of race, culture, or national or ethnic origin, and capture disaggregated data for all new complaints.

- We undertook a public engagement process to seek input from people with disabilities and the organizations that advocate on their behalf about our new designation as the body responsible for monitoring the Government of Canada's implementation of the United Nations Convention on the Rights of Persons with Disabilities. We published [two accessible and bilingual infographics](#) highlighting the preliminary results of this public engagement, as well as provided [an update in our 2020 Annual Report to Parliament](#).
- On the heels of our [horizontal audit on Indigenous employment in the banking and financial sector](#), we [launched a horizontal audit on the representation of Racialized people in executive and management positions in the federal public service](#) in July 2020. Our approach to this audit is different not only because it focuses only on Racialized people as one of the four designated groups under the Employment Equity Act, but also because, for the first time, the Commission is exploring representation in a specific occupational group within the public service and looking at possible systemic barriers to employment for Racialized people. The Audit will also look at representation in the feeder groups to provide the audited organizations with trend analysis and goals to ensure ongoing representation at the management and executive levels in the future.
- We are ensuring new systems, including internally developed or procured hardware and software, meet modern accessibility standards.
- Our first Framework for Disability Inclusion is expected to be published this winter.
- We are reviewing HR, Procurement, Communications policies, programs and initiatives using Gender-based Analysis Plus (GBA+) and considering various identity factors including race, ethnicity, religion, age, sexual orientation, gender identification and expression, and mental or physical disability to identify systemic racism, and barriers to accessibility and disability inclusion.
- We are continuing to approach all our priority areas, including our four new mandates, through an anti-racism, equity and inclusion lens. We do this with the full understanding of the intersectional and interconnected dimensions of a person's identity (e.g., race, ethnicity, religion, age, sexual orientation, gender identification and expression, and physical or mental ability). Canada cannot purport to be a leader in anti-racism, equity and inclusion without a clear vision that includes an accessible Canada for all, equal pay for work of equal value, adequate housing, a comprehensive federal anti-hate strategy, the implementation of the United Nations Declaration on the Rights of Indigenous Peoples, the implementation of the United Nations Convention on the Rights of Persons with Disabilities, and that respects the human rights of trans and non-binary people in Canada. These various areas of equal priority for the Commission are inextricably linked to our anti-racism efforts.

Call to Action 7: Enabling and advancing the work of grassroots networks and communities within the Public Service by providing necessary resources and bringing them into discussions at senior executive tables

- We struck a new Decolonization and Anti-Racism Consultation Committee comprising a diverse team of Commission employees who provide the perspectives of people with lived experience with systemic racism to inform the Commission’s work.
- A core part of our work involves building and maintaining strong relationships with human rights stakeholders across Canada, especially grassroots and advocacy organizations such as Pro Bono Students Canada, the Act2EndRacism Network and Amnesty International Canada. We work to amplify their voices in our meetings with senior officials and Parliamentarians, and in the advice we provide to policymakers and lawmakers.

Call to Action 8: Including voices from diverse backgrounds in the identification of systemic racism, discrimination and barriers to inclusion, and the design and implementation of actions to address them

- We are continuously applying an intersectional lens to our work by engaging with our diverse community of stakeholders. Our stakeholders on LGBTQ2SI+ rights, our stakeholders on housing rights, our stakeholders on accessibility and disability rights, and our stakeholders on pay equity rights, to name only a few — all inform our ongoing anti-racism work.
- We have engaged external facilitators to meet with Racialized and Indigenous employees to hear their personal perspectives and experiences with possible institutional and structural barriers within the Commission.

Call to Action 9: Measuring progress and driving improvements in the employee workplace experience by monitoring disaggregated survey results and related operational data (for example, promotion and mobility rates, tenure) and acting on what the results are telling us

Our extensive efforts towards this ninth Call to Action are presented in the following Section, “Our measurement and results.”

2. Our measurement and results

The Commission operates with the core principle that measuring progress is the key to driving lasting change. This is why:

- We report regularly on the progress to date of our Anti-Racism Action Plan. Monthly progress updates are provided around the executive table, and [bi-annual Progress Reports](#) are developed and shared with staff, and made public.
- We have engaged external facilitators to meet with Racialized and Indigenous employees to hear their personal perspectives and experiences with possible institutional and structural barriers within the Commission.
- We have conducted “pulse check” surveys, including on the Commission’s level of accessibility in its physical and digital spaces.
- We looked to the annual Public Service Employee Survey as one of several important tools to help us assess the employee experience.
- We continue to hold regular town halls led by the Chief Commissioner and the Executive Director to foster an environment of openness so that employees can feel free and unencumbered to provide their feedback or ask questions directly to the highest level.
- We conducted an [independent third-party employment equity audit](#) of the Commission’s workforce to examine the representation of Racialized people, Indigenous people, and people with disabilities within the Commission, using a GBA+ (Gender-based Analysis) lens, to help identify barriers to employment at senior levels for these designated employment equity groups.
- We are now collecting disaggregated data regarding Commission recruitment, hiring, retention and promotion of Indigenous, Black and Racialized staff.

The Canadian Human Rights Commission was encouraged in 2020 by the Treasury Board of Canada Secretariat’s recognition of the Commission as the only public service organization of its size to meet or exceed the Government of Canada’s targets for representation of all employment equity groups. That said, we are determined to improve even further.

Using the data and conclusions in the final report on the Commission’s [independent third-party employment equity audit](#), as well as the findings of our upcoming employment systems review in winter 2021, we will continue our ongoing work to adopt measures to identify and remove barriers to full workplace equity for Indigenous, Black and Racialized employees, employees with disabilities, and women. The Commission will then develop and implement an employment equity plan in consultation with unions and our internal Decolonization and Anti-Racism Consultation Committee.

3. Our challenges and barriers

Organizational and systemic transformation always come with challenges. The Canadian Human Rights Commission is a small organization with a now expanded mandate, operating with limited resources, all during an unprecedented pandemic period.

The passing of three important pieces of human rights legislation, namely the **Accessible Canada Act**, the **Pay Equity Act** and the **National Housing Strategy Act** has significantly increased our workload, and the pandemic has meant that Commission staff — like staff in most organizations — has had to adapt quickly to a drastically changed reality. This combination of a heavier workload and the requirement to work remotely has affected staff across the Commission, especially when it comes to taking on new priorities.

At the same time, we are also entering a period of change around the Commission's leadership table. These changes bring challenges to momentum and knowledge-transfer. To overcome these challenges and ensure that the work outlined above continues seamlessly and is treated with priority, the Commission:

- Continues to engage and support staff while working remotely, including by providing remote anti-racism, equity and inclusion training.
- Continues to hold virtual town halls to provide employees with a safe space to speak directly with senior leaders.
- Created the Decolonization and Anti-Racism Consultation Committee.
- Is integrating anti-racism, equity and inclusion principles into our day-to-day work to ensure they are embedded into the very fabric of how we operate as an employer, a service provider and regulator, and as a human rights advocate. The ultimate goal is that this important work outlasts any one leader, any one individual at the Commission.

Given that the Commission's mandate is to drive equality forward as it relates to *all* grounds of discrimination legislated under the Canadian Human Rights Act, focused attention on racism has raised questions about whether promoting the importance of one issue comes at a disadvantage to other issues. Our mindset on this has always been that there is no hierarchy of human rights, and that human rights do not exist in their own vacuums. We hold that to improve the rights of one group is to also improve the rights of so many other intersecting groups. Any change that promotes equality and inclusion ripples outwards and helps create systemic change.

4. Our employee response

As we have told our staff, the Commission's Anti-Racism Action Plan belongs to them, and must reflect their voices, their experiences and their input. Our close consultation with staff was essential to the development of the first edition of our Anti-Racism Action Plan, and has been imperative once again in the development of the second edition, soon to be released. This has included specific consultation with Indigenous, Black and Racialized staff through an external facilitator and our internal Decolonization and Anti-Racism Consultation Committee.

In addition, the early buy-in and commitment from the Commission's executive team has been essential to this process. From day one, our executives have been supportive and passionate about our anti-racist organizational change, listening and learning, and leading by example when it comes to being closely engaged in the implementation of the Commission's anti-racism, equity and inclusion initiatives.

Finally, in recognition that these discussions and issues can often be re-triggering or re-traumatizing for some individuals, we have taken steps to ensure that qualified and appropriate mental health support is available to any employee who experiences stress, trauma or other mental health issues related to the impact of racism, in whatever form it may manifest. A dedicated counsellor has been available to Indigenous, Black and other Racialized Commission employees – and to any employee who has experienced stress or trauma due to their proximity to, or witnessing of, racism – since February 2021 to provide support with regard to racism-related stress and trauma. This service is in addition to existing support services offered under the Employee Assistance Program, which continues to be available to support all Commission employees.

5. Our momentum

The key to the success of our anti-racism, equity and inclusion work is that it be never-ending. It must be continuous, and it must be evergreen. The strong foundation of knowledge and momentum that has been built under our current leadership must be maintained to ensure the successful advancement of our anti-racism, equity and inclusion efforts. This is why:

- We have created our comprehensive and foundational Anti-Racism Action Plan to ensure that anti-racism is embedded into the very way we operate as an employer, a service provider and regulator, and as an advocate. Our Action Plan is structured in such a way that it will outlive the presence of any particular executive or employee. We have divided the various action items among our divisions so that implementing and permanently adopting this work is truly a Commission-wide effort.
- We have created and chair the first-ever Council of Federal Accessibility Agencies comprising federal agencies, commissions and tribunals responsible for enforcing the Accessible Canada Act. We formed the Council to ensure our various organizations stay the course and continue working together to create a barrier-free Canada, as well as to ensure collaboration and efficiency where our roles and responsibilities overlap.
- We have tied the progress of our anti-racism, equity and inclusion work to Executive Performance Accords to hold Branch heads to account.
- We will continue to prioritize ongoing practices such as anti-racism training to staff, onboarding of new employees, and promoting mentoring and leadership training for Racialized employees.

In this era of building back better, the principles of anti-racism, equity and inclusion are paramount. They will continue to guide the Commission's recruitment, hiring, retention and promotion practices. As we have laid out in all the aforementioned actions we are taking — informed by our Employment Equity Plan, and our Anti-Racism Action Plan — we will continue striving to ensure that in this new post-pandemic era, no one is left behind.

6. Our data

The Commission is a small departmental agency whose workforce comprised approximately 260 staff (not including students, casual workers, terms of less than three months and temporary help) at year-end 2020-21, and 212 staff at year-end 2019-20. While disaggregation of demographic data about staff appointed to the Commission is not possible, as that data would be personally identifiable, the Commission is pleased to present the findings of an [independent third-party employment equity audit](#) it commissioned to examine representation within its workforce in 2019-20, using a GBA+ lens.

The Summary (page 3) in the Final Audit Report notes that the Commission continues to have a strong representation of members from the groups designated under the Employment Equity Act when compared to the availability in the Canadian workforce. However, when looking at the representation rates by occupational category, special attention is required for women and Indigenous people.

The Management Action Plan (page 12) outlines concrete recommendations. Among these is the adoption of an Employment Systems Review, and steps are currently being taken to begin this work.

A final word

Canada is living through an historic time. History will judge how we *act* in this moment. The pandemic has expanded the circle of vulnerability in our society, and exposed long-standing issues of racism, inequity and inequality for many groups, including women, people with disabilities, Indigenous peoples, and Black and Racialized people.

The Canadian Human Rights Commission is more committed than ever to being a driver of positive change and an active voice in pushing for a barrier-free Canada, for accessibility and inclusion for all, and for a Canada where equity is woven into the very fabric of our diverse society. We not only make this solemn commitment now, as Canada begins to build back better, but for the decades that will follow this historic crisis.

It is not enough to say that we embrace diversity and human rights as the foundation of our democracy. Our work must now be backed by meaningful and continuous action that is informed by those with lived experience.

We thank you, Madam Clerk, for this important opportunity and powerful initiative.

Together,
The Canadian Human Rights Commission
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