Ottawa Police Service

2019 DIVERSITY Audit Report

November 2019

FOREWORD

CONTENTS

EXECUTIVE SUMMARY

The Diversity Audit (or "the Audit") was undertaken by the Graybridge Malkam (GM) research and consulting firm during 2018-19, under contract with the City of Ottawa on behalf of the Ottawa Police Service (OPS).

The Audit was initiated by the OPS with the objective of taking a comprehensive look at practices identified as important to the achievement of its Multi-Year Action Plan for Bias-Neutral Policing (MYAP). The Diversity Audit used a variety of research methodologies to explore the topics identified in the scope:

Topics	Methodologies
• Leadership & Governance	• Desk review of documentation and data (150+)
• Representation of Diversity	• Fact-finding interviews (50+)
• Human Resource Practices	• Interviews with OPS members (50)
• Human Rights and Anti-Discrimination Policies and Practices	• Community insight sessions (85 participants)
• Service Delivery	• Best practices research
	• Benchmarking

The Audit process was designed to uncover both strengths and gaps in the current OPS practices for assuring a workplace characterized by equity, diversity and inclusion (EDI) in support of achieving the Service's MYAP goals. Its scope rested on a multi-dimensional view of diversity – including 'all the ways in which we differ,' specifically but not exclusively the protected grounds of the Ontario Human Rights Act.

The OPS has implemented many of the widely-accepted policies and formalized practices to support EDI. Over the course of the Audit timeframe, there was ongoing evidence of significant changes and continuous improvement efforts. It is important to acknowledge these strengths and ongoing investments.

Simultaneously, there have been significant concerns expressed internally and externally regarding the OPS's ability to provide the workplace culture and policing services that reflect an equitable and inclusive treatment of all aspects of diversity.

Some of the key themes in the findings include:

- There is not a strong understanding of EDI – its importance and implications for each individual's day-to-day actions – across the OPS.
- There are many OPS efforts underway in support of EDI; a more cohesive and coordinated approach would likely yield greater impact.
- There have been gaps in setting expectations and taking a stand with regard to appropriate and inappropriate behaviours.
- The OPS workforce is not fully representative of the diversity found in the community(ies) of Ottawa.
- While many good practices are in place, gaps arise in putting them into practice day-to-day.
- Incidents from the recent (and not-so-recent) past continue to resonate and influence current perceptions. Stories are told and re-told. Changing these narratives will require a clear strategy and a strong signal of sustainable change.
- There continue to be systemic barriers to the recruitment and advancement of individuals from diverse populations. Unintended barriers are often complex and require intentional and thoughtful action to address.
- There are some decision-making practices that open the door to possible biases. In the current work environment, limited transparency in these decisions protects individual privacy yet also fosters rumour, resentment and mistrust.
- Absence and accommodation of members with medical or family-related work restrictions is exacerbating staffing shortages and creating concern.
- Even those in the community and among the OPS members who have their doubts and complaints nonetheless harbour some goodwill and interest in contributing to positive change. These are valuable resources to be leveraged.

THE "VITAL FEW" RECOMMENDATIONS

Many good practices are in place; the OPS could continue to progress on EDI by chipping away at remaining barriers through adopting recognized good practices and innovating on others. The report provides a total of 97 recommendations, several in each of the key areas of review. They are important and can lead to useful improvements.

However, we find that there is an expectation in the community, on the part of stakeholders, and among the OPS members that more substantive and sustainable change is required. We find that there is a growing level of commitment within the OPS to undertake change of this nature. While some have asked for an explicit focus on 'culture change,' it is our view that it is time for action and it is in fact through action that an equitable, diverse and inclusive culture can be shaped.

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We conclude from the Audit findings that the following ten (10) recommendations are vitally important for signalling commitment, creating a foundation for sustainable change, and generating momentum at this pivotal time.

RESOLUTE LEADERSHIP

- OPS leaders must make an individual and collective commitment to providing consistent, visible leadership to Equity, Diversity and Inclusion. [Recommendation #13]

  - Undertake an impactful and bold program for *Authentic, Courageous and Inclusive Leadership* with senior OPS leaders.
  - Establish clear EDI accountabilities and performance objectives for senior leaders, cascaded to the appropriate organizational level.

INCLUSIVE HIRING

- Remove systemic barriers in recruitment and hiring, with an immediate priority on the process for background checks. [Recommendation #27]
- Explore and pilot innovative models for entry-level positions, such as newly designed positions and assignments of two to three years in duration. [Recommendation #28]

INCLUSIVE CAREERS

- Explore options for a career development program that would provide diverse members with mentoring, access to sponsors / advocates, and more formalized access to development opportunities. [Recommendation #42]
- Redefine and modernize promotion criteria to explicitly value the skills that come from a diversity of perspective and experience. [Recommendation #43]

EQUITABLE WORKPLACE ACCOMMODATION

- Restore trust in the accommodation of members who experience health-related restrictions: take a tough stand on any who abuse the system and provide better empathy and dignity to members who are hurting. [Recommendation #64; also related #65 and #66]

CLIMATE OF OPENNESS AND HIGH STANDARDS

- Equip supervisors at all levels with the skills and willingness to call out and address poor performance, including (but not restricted to) gaps in equity, diversity and inclusion behaviours. [Recommendation #33]
- Define behaviours with senior leadership to create a norm of a 'culture of openness' where people are open to discussing difficult topics, challenging others' thinking, and hearing feedback as part of a "reflective practice." [Recommendation #16; also #39]

PSYCHOLOGICAL WELL-BEING

- Expand the use of successful approaches to prevent burn-out, stress, PTSD and related challenges to mental health; including timely support, balanced flexibility and reduced stigma. [Recommendation #56]

LEARNING PARTNERSHIPS

- Explore and pilot various models of partnership with community groups and agencies to focus specifically on equipping OPS members with the knowledge, attitudes and skills required to interact more effectively with the full range of people in Ottawa's communities. [Recommendation #96]

NEXT STEPS

We understand that the OPS is developing a comprehensive Strategic Action Plan that will guide its next steps. The recommendations of the Audit are almost always connected and occasionally interdependent for achieving maximum impact. A strategic plan will help to coordinate and optimize the actions in the way ahead.

The Diversity Audit provides 97 recommendations at two levels:

- o *Primary Recommendations* are those that we conclude will strongly signal change and have a substantial impact on the organization and its culture. Taken as a whole, they will have a sustainable positive EDI impact. Ten of these are highlighted in this Executive Summary as the "Vital Few" Recommendations.
- o *Supporting Recommendations* are those that will bring valuable improvements to policies and practices. As with the Primary Recommendations, they are designed to remove systemic barriers faced by members of under-represented groups.

In addition, the detailed *Diversity Audit Research Supplement and Technical Appendix* also contains *Additional Tips* as suggestions for continuous improvement to align OPS process details with best practices. They are generally quick wins that can be implemented with little to no cost, yet still help to reduce barriers. We suggest that there is no need to include them in an organization-wide EDI Action Plan or to expend effort to formally track their implementation. For those suggestions, "Just do it."

Strategic goals and measurements must be defined as the OPS moves forward. Benchmarking of progress can be achieved in multiple ways, including:

- The Diversity Audit has reviewed equity in practices and found many strengths yet important remaining barriers. Overall the *Global Diversity and Inclusion Benchmarks* would position the OPS at a level of "Reactive" approaching "Proactive."
- The 2017 OPS Census has captured the demographic diversity of the OPS workforce, showing some gaps and a lack of progress in the 2012-2017 period.
- The Census along with the 2018 Engagement survey has captured perceptions of inclusion, showing gaps overall and for racialized members and women, in particular.

In conclusion, the Ottawa Police Service Diversity Audit results confirm that it is time for action. The findings and recommendations can point the way.

> *It is difficult to get people to* think *their way into a new way of acting.*
> *Instead, people must* act *their way into a new way of thinking.*
> - John Kenagy, MD

INTRODUCTION

The Diversity Audit for the Ottawa Police Service (OPS) explores a domain that is sometimes hard to discuss, harder to define and impossible to ignore. Within the OPS, it reflects directly on the Service's ability to achieve the goals of its Multi-Year Action Plan for Bias-Neutral Policing (MYAP) and its more recent strategic focus on Equity, Diversity and Inclusion (EDI). It touches on accountability and ethics, and on awareness and empathy. It touches on fairness and favouritism, and on privilege and partnership.

A police service that is characterized by equity, diversity and inclusion is one that is better able to deliver on Sir Robert Peel's well-known principles of effective democratic policing to maintain safety and security. With an emphasis on community, he emphasized that "the police are the public and the public are the police."

As the characteristics and needs of the public evolve, the OPS is challenged to evolve accordingly. Equity, diversity and inclusion help it to do so. According to the OPS Strategic Direction 2019-2020, "Police organizations that value and build a culture of EDI demonstrate better community safety results and have greater ability to establish trusting relationships and provide bias-neutral policing."

The Diversity Audit looks inwards. It examines the Service's EDI progress to date and proposes some directions for next steps. The primary focus is on the internal EDI practices that create the climate and competencies for the OPS members to deliver services that help ensure safety and security in Ottawa.

BACKGROUND AND SCOPE

The Ottawa Police Service undertook this Diversity Audit (or "the Audit") with the objective of taking a comprehensive look at practices identified as important to the achievement of its Multi-Year Action Plan for Bias-Neutral Policing (MYAP).

The Diversity Audit was conducted by the Graybridge Malkam (GM) research and consulting firm during 2018-19, under contract with the City of Ottawa on behalf of the Ottawa Police Service (OPS).

The scope of the Audit rested on a multi-dimensional view of diversity – including 'all the ways in which we differ,' specifically but not exclusively the protected grounds of the Ontario Human Rights Act.

The topics identified as being central to the achievement of the MYAP goals included:

OPS Diversity Audit — Areas of Focus

Leadership and Governance	Representation of Diversity	Human Resources	Human Rights; Anti-discrimination	Service Delivery
Vision, Strategy Business planning Structure Leadership & Accountability Communications	Support for the goal OPS workforce snapshot	Recruitment Performance management Training Career development Retention Job design & documents Health & wellness	Accessibility Accommodation Workplace climate EDI education Complaint resolution	Deployment Traffic Stop Race Data Community engagement Partnerships

The scope of the Audit also rested on an expectation that it would uncover both strengths and gaps in the current OPS practices for assuring a workplace characterized by equity, diversity and inclusion (EDI) in support of achieving the Service's MYAP goals. As described below, this scope called for a comprehensive methodology.

METHODOLOGY

This section provides an overview of the methodology used for the Diversity Audit.[1]

The methodology was designed to provide multiple perspectives on the full range of topics that were in scope for the Diversity Audit. Having different methodological approaches provided a mechanism to test, validate, and extend the information coming from any one particular source.

Over the course of the Audit, the Graybridge Malkam team included ten (10) consultants with extensive experience in diversity and inclusion; four (4) were involved on an ongoing basis over several months and six (6) provided focused input and support at particular points in time.

Each step of the methodology was reviewed and approved by the OPS project representatives. Consultation and guidance from the Senior Leadership Team and internal subject matter experts was helpful throughout the process.

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[1] More details can be found in the *Diversity Audit Research Supplement and Technical Appendix.*

DESK REVIEW OF DOCUMENTATION AND DATA

The consulting team reviewed more than 150 OPS documents directly related to Equity, Diversity and Inclusion within the Service. These were assessed for potential systemic bias and adverse impact on groups with various identity characteristics (and intersections) that are defined as protected grounds in the Ontario Human Rights framework. The team used standardized criteria customized from the well-regarded Employment Systems Review approach used for Employment Equity action planning. The reviewed documents included:

- Reports and informal results of community consultations and external research conducted within the last several years, such as the 2018 public opinion research; the report of the Outreach Liaison Team; Traffic Stop Race Data Collection research; and the results and feedback from ongoing community sessions and input.
- Policies and documented processes for a comprehensive range of people management practices, such as sample job descriptions; training programs; collective agreements; performance management; and outreach materials. As much as possible, the Audit reflects any revisions up to and including the end of October 2019.
- OPS communication materials, such as the OPS website; public statements related to equity, diversity and inclusion; and internal communications supporting the implementation of certain policies related to EDI.
- Reports of research related to the OPS workforce, such as the 2012 and 2017 Census results and the 2018 Engagement survey.

FACT-FINDING INTERVIEWS

More than fifty (50) interviews were conducted with over forty (40) individuals who are particularly knowledgeable about management practices and EDI within the OPS. The purpose was to clarify and/or provide additional input with regards to formal and informal policies and practices and to identify relevant issues that relate to achieving MYAP and EDI goals. These interviews explored topics such as EDI understanding and support; any identified concerns and proposed changes to practices; how policies and processes are applied in practice; informal approaches that are not documented in policies; and suggestions for next steps. Interview participants included, for example, external stakeholders such as the Ontario Human Rights Commission; senior leaders within the OPS, the OPA and OPSB members; and managers with responsibility for activities such as recruitment, training, and community relations. The consultants used a semi-structured interview protocol with pre-defined questions customized to the individual's role.

INTERVIEWS WITH OPS MEMBERS

We conducted confidential interviews one-on-one or with small groups of OPS members. All members were given an opportunity to volunteer. In total, fifty (50) members participated.

The interview sample was not designed to be statistically representative of the full OPS population. Rather, the purpose of these interviews was to solicit additional insights that would illuminate the areas of concern and uncover honest and productive information that the OPS could use to enhance and improve its practices in the area of equity, diversity and inclusion. The interviews were also an important opportunity for OPS members to share their views and lived experiences, knowing that they have "been heard." Engaging a wide range of members was deemed integral to an inclusive audit process.

Interviews were conducted using a defined set of questions extended as needed to explore additional topics of particular interest to the member. Notes were transcribed and analyzed using recognized qualitative research techniques to identify themes.

COMMUNITY INSIGHT SESSIONS

Eleven face-to-face sessions with a total of 85 participants were held with community members. These sessions were not intended to be a broad-based public consultation; much discussion has already taken place and there is a risk of 'consultation fatigue.' Rather, the approach engaged groups and individuals who have particular interest in the topic, in order to validate previous findings and explore potential solutions and next steps. The sessions were conducted with a defined set of questions, adjusted as needed to explore topics and insights that were particularly relevant to the specific group. A parallel online questionnaire was available to anyone who was interested but unable to attend.

BEST PRACTICES ENVIRONMENTAL SCAN AND TARGETED RESEARCH

The consulting team conducted targeted secondary research of published literature and online sources to identify promising practices of other organizations, including other police services.

The OPS current practices were assessed against the *Global Diversity and Inclusion Benchmarks* (GDIB). These standards are becoming more widely used by organizations that want to enhance their progress on EDI practices. While not perfectly suited to the policing environment, they are very instructive and provide a reasonable benchmark for identifying strengths and gaps; for suggesting appropriate next steps; and for monitoring future progress.

The assessment reported here reflects a consensus rating compiled from individual ratings by seven members of the consulting team; four had been extensively involved throughout the Audit and three were primarily external to the project activities. In all cases, the consultants reviewed the Audit findings and applied their EDI expertise and professional judgment to determine a rating.

LEADERSHIP & GOVERNANCE

This section assesses the leadership, structural, and strategic scaffolding for making successful EDI progress within the OPS.

It examines four topics:
- EDI Vision, Strategy and Business Case
- Business Planning
- EDI Structure and Implementation
- Leadership and Accountability

Taken together, these elements create the framework to understand, plan, design, and follow through on commitments toward building an OPS that is characterized by equitable, diverse and inclusive practices. These four aspects are critical to achieving success with the remaining recommendations.

EDI VISION, STRATEGY AND BUSINESS CASE

A clear vision, strategy and business case for EDI establishes 'why' it matters for an organization. It lays out priorities that are directly tied to the most important outcomes.

FINDINGS

- The OPS has made a strong and visible public commitment to EDI and Bias-Neutral Policing.
- There is a shared understanding among senior leaders that EDI is linked to providing service to the Ottawa community. There is not a consensus on a clearly articulated alignment of EDI to important organizational goals. There has been a noticeable improvement during the period of the Diversity Audit.
- There is not an overarching EDI strategy with meaningful measurements for monitoring progress in EDI related to important OPS goals. Activities and responsibilities are not sufficiently coordinated or focused to produce sustainable results. A current project to develop an EDI Action Plan is a positive step.

RECOMMENDATIONS

PRIMARY

1. Create a strategic plan with measurable goals for improving equity, diversity and inclusion within the OPS. Leverage and extend (if necessary) the EDI Action Plan currently under development. The plan must have clear outcomes tied to the OPS success factors – those factors that will yield an improved ability to conduct the policing activities that enhance the safety of the community. The factors that can be affected by EDI might include, for example:
   - Increased innovation
   - Strengthened community relationships, in particular with marginalized or victimized segments of the Ottawa community
   - Better access to a range of talent
   - Enhanced ability to access, leverage and interpret community information
   - Better health & wellness of members and lower absenteeism / shortages

SUPPORTING

2. Develop an "EDI leadership lens" or similar tool that can be used in Senior Leadership Team discussions and for decision making by senior leaders.

BUSINESS PLANNING

Business plans translate strategic directions into roles and responsibilities, and programs or actions with timeframes and budgets.

FINDINGS

- EDI is integrated as one of the four areas of focus for the OPS Strategic Direction. This is a positive practice. Detailed work plans were not finalized, pending new leadership (Police Services Board; Chief of Police).
- Indicators and measurements for EDI outcomes have not yet been developed. Measurements that do exist for EDI activities such as those reviewed in the Audit are focused on inputs and investments, such as delivery of training sessions, numbers of members with medical accommodations, and implementation of new practices. These are necessary but not sufficient.
- There is not a strong practice of applying an "EDI lens" to planning of programs and activities. GBA+ training has been delivered to managers and senior leaders; there is at least one example of GBA+ having been used in an operational decision about pistols.

RECOMMENDATIONS

PRIMARY

3. Develop and report regularly on key indicators for EDI investments, progress and impact, drawn from the EDI Strategy (see above) and/or EDI Action Plan.
4. Gradually implement a practice of conducting a GBA+ (or EDI lens review) on operational programs and investments within the Business Plan. Encourage and gradually require internal proposals to include a GBA+ perspective, or the application of an EDI lens.

SUPPORTING

5. Develop a user-friendly customized "EDI lens" or "GBA+ methodology" for use within the OPS. Leverage what exists externally (e.g., City of Ottawa, Federal Government).
6. Develop a methodology for monitoring the diversity of the OPS workforce, using member demographic data that will now be available through the dynamic census mode.

EDI STRUCTURE AND IMPLEMENTATION

This section summarizes strengths and gaps in identified roles and responsibilities, reporting structures, resources and the OPS's track record for implementation.

FINDINGS

- Structure:
    - Deputy Chief Jaswal is identified as the executive sponsor of Equity, Diversity and Inclusion initiatives within the OPS.
    - There are efforts underway to create a responsibility centre for EDI to ensure sustainability and coordination of EDI efforts that are currently occurring in multiple work groups.
    - There are a few diversity networks (internal and external) in place, including Employee Resource Groups (ERGs) still in their early days and the new Community Equity Council.
- Investment / Resourcing:
    - The OPS invests in a number of initiatives in support of EDI.
        - Several important projects have been undertaken in recent years. They receive good levels of organizational attention; the projects have been well resourced with external support as needed; and the results are regularly discussed at senior leadership levels.
        - There are ongoing efforts with an external focus such as Race Relations and Community Development. Activities with an internal focus are numerous and are discussed throughout this report.
    - Resources for an EDI Office and other EDI-related activities (broadly defined) have not been confirmed.
    - Some OPS staff members are assigned to EDI-related activities only temporarily on a project basis, potentially creating a risk of EDI being seen as 'flavour of the month' with efforts that are not sustainable. Nonetheless, recent temporary assignments to bolster the organization's capacities in EDI, outreach recruiting, race relations, and respectful workplace are a positive step.
- Implementation:
    - The OPS is characterized by a strong command structure and culture. What gets mandated gets done. Very specific and practical directions and guidelines are well received within the organization.
    - Committed initiatives are tracked and reported in the Multi-Year Action Plan for Bias-Neutral Policing.

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- After the Gender Audit, the OPS set a target of 23 percent representation of women in all units / department within the OPS. There are processes in place to monitor progress. EDI targets for other diverse groups have not been established.
- Lengthy approval processes have led to slower than desired progress in completing projects, implementing new policies, or bringing change to fruition.
- There is a lack of clarity on how a comprehensive and strategic view of EDI is integrated into some of the core organizational systems.

RECOMMENDATIONS

PRIMARY

7. Expedite the efforts to define the "EDI Office" in the context of a comprehensive EDI strategic action plan.

SUPPORTING

8. Implement recommendations from elsewhere in this Audit report in order to better integrate EDI into the OPS systems and practices. Continue to identify and invest in opportunities to advance the state of EDI within the OPS.
9. Structure each EDI-related initiative and work group in a manner that will gain attention and credibility within the OPS.
10. Undertake a focused review or "audit" of the OPS externally-focused EDI efforts. Build on this Diversity Audit, as well as findings from recent initiatives such as OLT, community engagement, public research and TSRDC. The CEC could play a key role.
11. Continue to actively support and encourage the development of ERGs. Communicate their progress regularly to OPS members.
12. Expedite the discussions of CEC role and responsibilities with respect to a strategic and coordinated EDI effort.

LEADERSHIP AND ACCOUNTABILITY

EDI progress requires leaders who hold themselves and others accountable.

FINDINGS

- There is a public OPS commitment to making progress on EDI. The PSB is in place to hold the OPS leadership accountable for taking action on EDI.
- Leadership throughout the organization has been seen as a critical gap in the OPS's ability to make substantial progress toward being more equitable, diverse and inclusive. (We note that the Diversity Audit data collection coincided with several changes in the Board and executive leadership.) There are gaps in some leaders' awareness and deep personal understanding of various dimensions of diversity and the implications for the OPS internally and in its work with community members. Commitment for EDI was identified as weak at the Superintendents level and below.
- EDI goals and objectives have not been created nor incorporated in management level performance agreements.

RECOMMENDATIONS

PRIMARY

13. OPS leaders must make an individual and collective commitment to providing consistent, visible leadership to Equity, Diversity and Inclusion.
    - Undertake an impactful and bold program for *Authentic, Courageous and Inclusive Leadership* with senior OPS leaders.
    - Establish clear EDI accountabilities and performance objectives for senior leaders, cascaded to the appropriate organizational level.

SUPPORTING

14. Develop communication materials to support leaders and managers in discussing EDI topics internally within the OPS and externally with the community.
15. Continue to provide EDI-related training to supervisors and managers.
16. Publicly acknowledge gaps, take ownership for past mis-steps and commit to change. The release of the Diversity Audit results is a prime opportunity to signal a change.

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EDI COMMUNICATIONS

Organizations with a focus on sustainable EDI make communication a crucial force in achieving the organization's EDI goals.

FINDINGS

- There are strict communications practices followed for policy implementation.
- OPS and PSB senior leaders have spoken about EDI in public forums. There is a strong Communications group with expertise available to support these efforts.
- Some OPS responses to incidents with an EDI aspect, either within Ottawa or in other locations, have been seen to be lacking in empathy or authenticity.
- The OPS has a mixed track record on its formalized public communications about EDI. The website is not fully leveraged to demonstrate EDI commitment and progress. While there has been some success in sharing project results, certain EDI-related reports have not been released before being "leaked" to the public.
- Some materials are available in multiple languages to better serve a diverse community, particularly within marginalized communities.
- Internal communication about EDI has been mostly to educate members about adhering to policy and compliance requirements. There is not a consistent communication of the OPS's commitment to EDI – why, what, how.
- There appears to be little ongoing discussion of EDI on a day-to-day basis between supervisors and their teams. Many supervisors appear to be ill-equipped to have substantive conversations about EDI issues related to core OPS work.
- There is a sense that there has been more "talk" than "walk" related to EDI.

RECOMMENDATIONS

PRIMARY

17. As an element of the upcoming EDI Strategic Action Plan, create a robust EDI communication strategy. The Plan should include innovative and impactful methods to build awareness and support for the OPS commitment to EDI both internally and externally.

SUPPORTING

18. Consider creating a standard protocol or set of principles that can guide decisions about public communications for: public release of reports; response to incidents with an EDI component; indicators of progress or advancements in EDI initiatives.
19. In conjunction with EDI training and education for supervisors and members, develop communication processes and tools to help participants apply the learning in conversations "back on the job."

REPRESENTATION OF DIVERSITY

This section reviews two aspects related to the representation of diversity:
- The support for 'representation' being an important objective within the OPS
- Findings from the 2017 OPS Census about the demographic make-up of the OPS workforce

The results from the 2017 Census (and 2012) have already been released to the public and thoroughly reviewed by the OPS. The Diversity Audit provides an opportunity to add value to these results by connecting them to other findings and themes. In a comprehensive view of Equity, Diversity and Inclusion, the overview of the Census addresses Diversity and the other sections of the Audit provide perspectives on Equity and Inclusion. Together, they can help to identify and prioritize actions.

SUPPORT FOR REPRESENTATION AS AN OBJECTIVE

This section examines the extent to which representation of the diversity of Ottawa is seen as a worthwhile goal within the OPS, and one to be supported by data gathering.

FINDINGS

- There is a belief that merit-based decisions and diversity goals are at odds with each other. Although the SLT and many in management agree with having representation, there are concerns about reverse discrimination when having a goal of hiring an increased number of diverse candidates. Concerns related to meritocracy were highlighted as a theme in the 2017 member census.
- There is a lack of education and understanding about the value of self-identification, throughout the organization.
- The concept of self-identification has been rolled out in the Equitable Work Environment (EWE) policy and operationalized in the Census (now in dynamic mode) and in the transfer process for sworn members.
- The 2019 implementation of a "dynamic mode" census that allows for regular updating will provide stronger data for monitoring progress and taking action. This is a positive step.

RECOMMENDATIONS

PRIMARY

20. Develop a communications strategy to shift the narrative around representation and self-identification, from one focused on compliance and percentages to one focused on OPS skillsets, strengths and diversity of perspective. For example, emphasize OPS census findings such as: 17% of sworn OPS members (or approximately 1 out of 6) speak a language other than English or French, or that in total OPS members can speak almost 40 different languages.
21. Continue to support the dynamic updating of the census data. Take action as appropriate to increase the response rate, particularly within the Frontline Directorate, where the participation rate was only 54% in 2017.

SUPPORTING

22. Implement other Diversity Audit recommendations to increase trust that hiring and promotion decisions are based on merit.

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THE OPS WORKFORCE COMPARED TO THE CITY OF OTTAWA

This section draws upon the results of the OPS workforce census conducted in 2017. Key findings summarized here help to provide context for the findings and recommendations of other sections of the Audit.

FINDINGS

- OPS census results showed that compared to available benchmarks, there was:
  - Strong representation of some minority groups, including those with Indigenous backgrounds, and those with LGB2sQ+ sexual orientations.
  - Significant under-representation of women, racialized persons, and people born outside of Canada.
- Compared to the 2012 OPS census results:
  - Despite significant attention to increasing the diversity of the OPS, there was not significant improvement in representation levels for many identity groups (women, racialized individuals, LGB2sQ+ persons, Indigenous people) between the 2012 and 2017 member censuses. Women's representation did not increase; a decreased percentage of women was noted within civilians and a stable percentage within sworn members.
- Racialized members and women within the OPS expressed particularly low levels of inclusion.

RECOMMENDATIONS

PRIMARY

23. Define a "diverse OPS workforce" that includes ambitious objectives with measurements for the following indicators that are related but distinct:
    - The OPS ability to provide service to the Ottawa population
    - Fairness and equity in hiring, promotion and retention practices
    - An inclusive and respectful workplace experience
24. Following up on the Diversity Audit, develop a strong communication plan that will:
    - Acknowledge the lack of significantly changed results in the diversity of the OPS workforce; and
    - Establish the census results as one important benchmark to measure future progress and hold the OPS accountable for changed results.

25. Implement the other recommended actions that are presented throughout the Audit report. They will be effective for producing a change in the representation rates, in the fairness and equity of people-related decisions, and in the experience of inclusion.

26. Establish a consistent benchmark for use in monitoring the representation rates. Our suggestion is to use the City of Ottawa adult population (wherever statistics are available) as an appropriate basis for understanding the OPS's ability to reflect the community it serves. On an exception basis, more targeted comparisons (known as a Workforce Analysis or WFA) against available labour market data could be completed as needed, to explore possible barriers in employment.

HUMAN RESOURCES PRACTICES

This section reviews the key policies and practices for 'people management' within the OPS. It draws on findings from all activities within the Audit process. The use of multiple methodologies allowed us to test, validate, and extend the information coming from any one particular source.

The seven practices addressed in this section are:
- Recruitment
- Performance management
- Training
- Career development and promotion
- Retention
- Job design and documentation
- Health and wellness

Key findings, primary recommendations and supporting recommendations are provided in this report.

RECRUITMENT[2]

The OPS has focused for many years on efforts to attract and hire an increasingly diverse pool of talent. This section reviews some positive actions and identifies gaps for extending and sustaining better results.

FINDINGS

- There are several positive outreach initiatives in place to attract diverse candidates from within the Ottawa community.
- Community members and stakeholders hesitate to recommend the OPS and a policing career to their network.
- Despite significant efforts in outreach and ongoing improvements in the hiring process, systemic hiring barriers remain, including:
  - Testing fees for application to entry-level sworn positions
  - Physical fitness and strength testing at the application stage
  - Background investigations and screening
  - A lack of understanding the link between EDI and 'hiring the best'
- Traditional entry pathways may be limiting diversity.

RECOMMENDATIONS

PRIMARY

27. Remove systemic barriers in recruitment and hiring, with an immediate priority on the process for background checks.
28. Explore and pilot innovative models for entry-level positions, such as newly designed positions and assignments of two to three years in duration.

SUPPORTING

29. Implement an applicant tracking process to collect data that can help identify on an ongoing basis any adverse impact on diverse groups.
30. Continue to explore options for replacing or revising the ATS testing process.
31. Continually adopt new practices to strengthen the outreach and hiring processes. Consider establishing a temporary task team for process improvements and innovations. Explore options for leveraging expertise available in the community.
32. Introduce measures to ensure that the application process is more inclusive for persons with disabilities.

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[2] The detailed *Diversity Audit Research Supplement and Technical Appendix* provides evidence and examples for each finding. It also supplements the recommendations with 25 "Additional Tips" for continuous improvements to current practices. Designed primarily for an internal OPS audience, it is available to interested parties upon request.

PERFORMANCE MANAGEMENT

In this section we report findings related to the formal Performance Management process but also more generally related to how members' performance is monitored, assessed and supported.

FINDINGS

- The OPS has a standardized Performance Management process in place, with supporting tools and resources.
- In practice, the Performance Management process and tools are not always used as intended. These gaps can pose systemic barriers to minority employees who are not as likely to have access to informal networks of support or who may be subject to bias or discrimination.
- There is a widespread perception that performance is not equitably evaluated or managed.
  - Significant concerns have been raised regarding the organization's response to poor performance.
  - Several OPS members from under-represented groups described in interviews how their approach to their work – policing, leadership, community engagement, etc. – differed from others (culture, gender, background, etc.) and was immediately evaluated negatively.
  - There are missed opportunities for feedback on individual behaviours related to EDI.

RECOMMENDATIONS

PRIMARY

33. Provide additional training or other supports to supervisors so that they are equipped to address performance issues. Conduct a needs assessment to determine the optimal approach to building both the skills and the willingness.
34. Pilot a constructive feedback process with a sample of community agency representatives who see the OPS officers interacting with their clients. One possibility could be to use the new Neighbourhood Response Teams as a pilot group.

35. Consider strengthening the EDI lens in the Performance Management communication materials and the training course. Include an explicit description of performance and self-assessment barriers that could occur based on culture, gender, etc. as well as information related to EDI considerations within performance management practices.

36. Address concerns of unfair or discriminatory use of the tracking log. For example, consider requiring a second review (by another supervisor or more senior officer) when entries are made into a performance record after several months' delay. Ensure that the OPS member has a chance to review and comment on any added entries.

37. Follow up on the Performance Management Program Coach Course to monitor implementation of the new process and simultaneously to gather feedback on the effectiveness of the Coach Officers, particularly through an EDI lens.

38. Consider piloting a process of upward feedback in supervisors' performance assessment. Several interviewees suggested this as an action, and it is regarded as a positive practice in many organizations. However, we recommend caution until there is confidence that the required level of trust and openness exists. It would be best to start with a pilot in selected groups or levels.

TRAINING

In this section we address the practices for providing training and development to both sworn and civilian members. Note that the use of training to enhance EDI capabilities within the OPS is addressed in a later section (see below "EDI Education").

FINDINGS

- Mandatory requirements, primarily for sworn members, consume a very large proportion of training efforts at the OPS. We did not uncover any barriers faced by under-represented groups in the access, scheduling or delivery of this operational training.
- Many members report that their opportunities for learning and development are insufficient. There is a gap in people management training for supervisors and managers.
- Members who have taken leaves will miss opportunities for important training, leading to career delays.
- The access to important learning & development opportunities is inconsistent; informal processes open the door to favouritism and systemic barriers to under-represented groups.

RECOMMENDATIONS

PRIMARY

39. Formalize the decision process for allocating training opportunities in programs that are critical for career advancement.

SUPPORTING

40. Because of the importance of certain training programs in providing sworn members with opportunity for subsequent career advancement, it is recommended that these target programs be integrated into a comprehensive career development perspective, as addressed in the recommendations below for career development.
41. Track the participation in the most important career-advancing training and development opportunities by demographic characteristics. We are not currently recommending quotas but rather an annual review comparing participation to the workforce demographics, and taking action as needed.

CAREER DEVELOPMENT AND PROMOTION

Formal and informal career management practices have a significant impact on an organization's ability to attract, retain and effectively utilize a diversity of talent. In this section we summarize our findings related to career growth for both sworn members and civilians.

FINDINGS

- Positive practices are in place for core aspects of career progression and talent management. The OPS has many practices that are consistent with generally accepted standards for supporting career development.
- The OPS has made significant changes to strengthen transfer and promotion practices. If used effectively, they can be expected to enhance equity, reduce potential impact of unintended bias, and increase member confidence in the process.
- There is a lack of confidence in the equity of current career progression practices.
    - There is a concern about "reverse discrimination" in the current processes. In particular, there is a belief that men are being disadvantaged by the gender targets within the sworn transfer process.
    - Others believe that women and racialized members continue to be disadvantaged in career progression.
- A perceived shortage of opportunities puts pressure on career development practices and outcomes.
- Gaps in equity remain due to subtle systemic barriers that have not been addressed, including those embedded in the criteria and the evaluation methods.
- There are limited resources available to support women and other diverse members who may not have the same access to sponsors and networks for their development and career advancement.

RECOMMENDATIONS

PRIMARY

42. Explore options for a career development program that would provide diverse members with mentoring, access to sponsors / advocates, and more formalized access to development opportunities.
43. Redefine and modernize promotion criteria to explicitly value the skills that come from a diversity of perspective and experience.

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44. Accelerate the adoption of best practices for staffing decisions, such as diverse interview panels, interviewer training, transparent decision criteria, meaningful debriefs to unsuccessful candidates, and guidelines for how to consider EDI goals when candidates are equally qualified.

45. Consider establishing a "strategic staffing review panel" that could host "challenge" discussions on staffing decisions in priority areas. These reviews with hiring managers would discuss the current diversity in the work unit, required skill sets and optimal development tracks for building readiness. It would enhance accountability and transparency. This could perhaps build upon the SSCMP that is in progress.

46. Until greater trust can be established (through adopting the above recommendations), consider supplementing the panel decisions with an external third party. This individual or group must be highly credible, objective, and with expert awareness of potential biases that could have an impact. The goal should be for this to be a temporary action.

47. Explore options for increasing the number of developmental opportunities. Suggestions included having more, shorter assignments; mandatory rotation; and moving everyone through the investigative units. Others advised creating specific roles and new opportunities that could, for example, be leveraged for better community relations or other strategic OPS priorities.

48. In addition to the quarterly movement statistics, compile more detailed data on successful / unsuccessful candidates for internal transfer / promotion processes. Aggregate and analyze the data on an annual basis to identify any potential barriers and adverse impact. Consider selecting particular groups or opportunities for a priority focus. Consider sharing the results to provide transparency to the numbers of candidates and their success rates.

49. Revise the succession planning process, whether formal for sworn members or informal for civilians, to factor in the OPS's EDI objectives and goals.

RETENTION

On an annual basis, less than four (4) percent of staff leave the OPS, excluding retirement. Drivers of turnover in most organizations typically include several factors that are addressed elsewhere in this Diversity Audit.

FINDINGS

- Turnover is not consistently explored for possible trends and systemic barriers.

RECOMMENDATIONS

Other recommendations throughout the Diversity Audit address turnover drivers such as lack of career opportunities, performance management, or a less-than-inclusive workplace experience.

PRIMARY

50. On a periodic basis, conduct "stay interviews" with sworn and civilian members who have been identified as high-performing and/or high-potential to explore current satisfaction, career aspirations, and their experience of the workplace. Ensure that members from under-represented groups are included.

SUPPORTING

51. Strengthen and refresh the exit interview process to tie it explicitly to strategic engagement and EDI issues. In particular:
    o Consider the option of having an external third-party conduct exit interviews, to maximize candor and ensure confidentiality about any concerns the employee might raise about the OPS workplace.
    o Collect and analyze turnover data, aggregating and comparing across years. Apply an EDI lens to identify any trends or issues for further exploration.
    o Finalize the Exit Interview Survey form. Revise and update it for more current language and to focus on the issues identified in the Engagement Survey and Diversity Audit.

JOB DESIGN AND DOCUMENTATION

This section explores primarily how the OPS jobs are documented and evaluated.

FINDINGS

- The OPS job documentation and evaluation processes reflect standard practices.
- Despite recent progress there are remaining gaps in confirming that job requirements are *Bona Fide.*
- Traditional views of policing can create systemic barriers within job design and documentation. There is little evidence of innovative redesign of jobs to increase flexibility, create new entry paths, or facilitate the accommodation of members with work restrictions.

RECOMMENDATIONS

PRIMARY

52. Undertake a review of a small sample of job documents for sworn and civilian positions and challenge the team to consider them within an updated view of the modern policing context.
53. Explore innovations in job design to enhance inclusivity.

SUPPORTING

54. Ensure that everyone who participates in the job evaluation process is trained on EDI principles and potential unintended barriers in job documentation and evaluation.
55. Continue to strengthen the practice of applying a BFOR review to all job descriptions, sworn and civilian.

HEALTH & WELLNESS

In this section we summarize the results of an overview of the wide array of health and wellness initiatives and practices within the OPS. There is a critical connection among EDI, ethics and professionalism, member wellness and engagement.

FINDINGS

- Member health and wellness is a continuing area of investment by the OPS. Overall, the initiatives appear to be well-designed and coherent.
- Absence rates due to illness or injury are a significant concern to the organization and its members.
    - The OPS has put systems in place to effectively manage both short- and long-term absences.
    - Senior leaders and members alike expressed significant concern about the impacts that absences are having on the organization and on the members.
    - There is widespread confusion about the distinction between 'absence' and 'accommodation.'
    - There is a perception that some members are abusing the system.
- Mental health is an area of immediate concern.
- There is limited flexibility available to OPS members.

RECOMMENDATIONS

PRIMARY

56. Create a cross-functional and diverse task team to find innovative approaches to preventing mental health issues and strengthening mental health support to members. Apply an EDI lens that considers intersectionality of various identity characteristics.
57. With the involvement of the two police associations, explore options for more flexible work arrangements.

SUPPORTING

58. Implement a mandatory debrief process (peer, supervisor, chaplain, and/or mental health professional) after emotionally difficult events.
59. Consider introducing a mandatory consultation with a psychologist or other mental health professional for members.
60. Ensure that supervisors are trained to carry out their responsibilities under the Attendance Enhancement Policy – effectively and in a bias-aware way.

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HUMAN RIGHTS AND ANTI-DISCRIMINATION

Consistent with the mandate of the Diversity Audit, the focus in this section is on the policies, practices and current performance of the OPS in addressing Human Rights internally. While this cannot be completely separated from its track record externally with community members and other stakeholders, that is not the primary focus.

The five topics in this section are:
- Accessibility
- Accommodation
- Workplace climate
- EDI education
- Complaint resolution (internal)

ACCESSIBILITY

This section provides some high-level findings related to the OPS's efforts to ensure its materials and facilities are accessible for people with disabilities. Please note that a thorough review of accessibility is beyond the scope of the Audit.

FINDINGS

- The OPS has put in place many of the formal structures and policies that are expected of employers in order to ensure accessibility and inclusion of people with disabilities.
- There is a multi-year plan to ensure AODA compliance, with defined timeframes and accountabilities.
- There are some remaining gaps:
  - Some sections of the website are not yet fully WCAG compliant.
  - While public areas of OPS buildings are accessible to people with limited mobility, other areas can be difficult to access if using a wheelchair.

RECOMMENDATIONS

PRIMARY

61. Conduct an accessibility review of OPS facilities to identify potential barriers for members with sensory impairments, mobility restrictions and other disabilities. Local service agencies often offer this as a service to employers.
62. Continue to progress on improving accessibility of the website materials.

SUPPORTING

63. Consider strengthening partnerships with local service agencies and advisors to develop expertise and be proactive in providing an accessible work experience for employees with a range of disabilities.

ACCOMMODATION

The Ontario Human Rights Code (the Code) requires an effort, short of undue hardship, to accommodate the needs of persons who are protected by the Code.

FINDINGS

- The employer's 'Duty to Accommodate' is poorly understood by many in the OPS.
  - There is confusion between 'absence from work' and 'accommodation.'
  - There is little recognition of the need to accommodate for characteristics beyond changing work duties where needed for medical accommodations, family status and sex (including pregnancy).
  - The OPS accommodation practice is well structured to meet the needs of individual employees, however there is limited capacity to address systemic issues in a proactive manner.
- The accommodation of members with work restrictions is an issue of critical concern within the OPS.
- Accommodation experiences do not always meet the test of 'dignity' and 'inclusion.'

RECOMMENDATIONS

PRIMARY

Given the importance of Workplace Accommodation as an area of concern, we offer three primary recommendations in this section. We advise that this be an area for immediate attention.

64. Develop and implement a comprehensive Workplace Accommodation Strategy. Our recommendations are that it should include:
    - Review and follow-up on a sample of current cases of Medical Accommodation to identify any opportunities for improving the process and to reassure members that there is a mechanism and commitment to addressing suspected cases of abuse.
    - An occupational analysis and/or job redesign to identify or create a wider range of positions that could be appropriate for sworn members, in particular, with work restrictions.
    - A review of the Priority Placement Process to ensure it strikes an appropriate balance of providing work with dignity to accommodated members while assuring equitable access to career opportunities for other members.

65. Develop a wide-ranging communication effort to clearly explain the recently introduced process improvements (Accommodation Committee) and address myths and misconceptions regarding the Accommodation program; with a clear acknowledgment of challenges but also a strong position on the rationale, the benefits and success stories.

66. Find a way to hold supervisors accountable for role-modeling and enforcing appropriate communication and behaviour regarding accommodation and members with disabilities. There must be 'zero tolerance' for behaviours ranging from micro-inequities to egregious harassment of members with medical accommodations.

SUPPORTING

67. Extend commitments for accommodation during the hiring process by including potential characteristics beyond disability and by offering accommodation as required during the hiring processes for sworn members.

68. Provide a wider range of uniform and equipment design to suit various groups of members, leveraging best practices and conducting an ergonomic assessment *if necessary*. Other police services have seen positive results from being proactive in uniform standards. For example, several have designated hijab designs (see for example, Edmonton, Calgary, Toronto and RCMP) with features such as tear-away pieces for safety.

69. Implement the other recommendations of the Diversity Audit in order to better accommodate the needs of diverse members.

70. Explicitly designate the EDI Office as having an ongoing responsibility to identify and mitigate barriers to inclusion of a range of diverse members.

WORKPLACE CLIMATE

An inclusive, welcoming and respectful workplace climate reflects a day-to-day experience where unconscious bias and inappropriate behaviours do not create barriers.

FINDINGS

- The OPS respectful workplace program is well designed; gaps arise in execution.
- There is evidence that many of the OPS members do not experience the workplace as respectful or inclusive. In particular, people with disabilities, women and racialized members have a more negative experience.
- Supervisors, managers and leaders are not seen as holding people accountable for inappropriate comments or behaviour.

RECOMMENDATIONS

PRIMARY

71. Implement a communication / education program to "Make Inclusion & Respect Everyone's Responsibility." Supervisors must be made aware of their responsibilities; perhaps by building on the current *Towards Authentic Inclusion* program. All members must be equipped as bystanders to act as allies when observing inappropriate behaviours ranging from egregious action to subtle micro-inequities. Results and impact should be reported and discussed regularly throughout the OPS.

SUPPORTING

72. Explore options for considering an individual's behaviour and EDI competencies within the decision-making on career opportunities.
73. Explore how to collect inclusion data on an ongoing basis; the dynamic version of the Census does not have this capability. The Employee Engagement survey could provide this option.
74. Implement other recommendations provided elsewhere in this Diversity Audit. Changing an organizational culture or workplace climate is only effectively accomplished with complementary powerful efforts on multiple fronts.

EDI EDUCATION

Effective ongoing education about human rights, diversity and inclusion – including training as well as communication – is important in building awareness as well as skills.

FINDINGS

- Several programs with a focus on Human Rights and Anti-discrimination have been offered by OPS over the past several years, with in-class and e-learning approaches.
- There is a gap in education efforts that would address broader EDI goals. Training has been predominantly for sworn members, to comply with legislative requirements and to support officers in their day-to-day interactions with the public. There has been less direct focus on creating an equitable work environment.
- There is a gap in supporting training participants in their on-the-job application of EDI principles and newly acquired skills.
- Those delivering training do not always 'walk the talk.'
- There is a need for innovative and cost-effective solutions.

RECOMMENDATIONS

PRIMARY

75. Develop a comprehensive EDI education strategy with measurements of impact, not only of investments (amount of training).
76. Prioritize education of Supervisors, Coach Officers and Trainers to ensure they are equipped and willing to address EDI issues with their teams, new recruits and training course participants.

SUPPORTING

77. Develop an "EDI lens" or similar tool that training specialists can apply in reviewing, redesigning and/or delivering existing training curriculum. Continue to enhance the integration of skill-focused EDI considerations into operational training programs.
78. Create a roster of community resources who could support awareness and skill-building about their community.
79. Accelerate where possible the current plans to develop and deliver EDI training, such as the extension of the new *Towards Authentic Inclusion* program. Ensure that supervisors understand and effectively play their role in supporting the training participants to apply the new learning on the job.

COMPLAINT RESOLUTION (INTERNAL)

Good practices in a workplace can reduce but not completely eliminate the possibility of concerns and complaints arising from employees. The process for resolving disputes as well as the organization's track record are both relevant for review.

FINDINGS

- The OPS has a formal complaint resolution process that is documented and resourced.
- Approximately sixty (60) internal complaints are received in a year under the Respectful Workplace program. This number includes complaints related to Human Rights protected grounds (discrimination, harassment, etc.) as well as complaints related to aspects such as disrespectful behaviour, workplace violence, and ethics.
- There are perceived gaps in the OPS's ability to apply the processes and resolve internal complaints effectively.
    - The timeframes for addressing formal complaints, including those submitted to the Ontario Human Rights Commission, were described as lengthy.
    - Several examples were raised citing dissatisfaction with the organization's response to concerns that fall outside the formal complaint process. The dominant view reported to us was that senior leaders were unwilling to 'take a stand' and confront difficult situations or hold people accountable for inappropriate actions.
    - There is an apparent lack of clarity and consistency in the decision-making process for resolution of complaints. It is not uncommon for organizations to have 'creative tension' in resolving complex issues that often require balancing competing rights and interests. It is our assessment that the OPS would benefit from improving their ability to have candid discussions on difficult topics, exploring different points of view, and ensuring that the factors involved in a decision are well understood.
    - It is not clear whether or how individual complaints, once resolved, are used for organizational learning or sustainable improvement.
    - Some members hesitate to raise issues and concerns for fear of reprisal.

PRIMARY

80. Hold leaders and managers at all OPS levels clearly accountable for timely, constructive, and bias-aware responses to concerns raised by members, whether informally or formally. Senior command must set the expectations and address any gaps.

SUPPORTING

81. Develop a structured approach to discussing and reaching decisions on complaints. This should explicitly take account of, and value, the different perspectives of the decision-makers and how they have sought to balance competing rights and concerns.
82. Monitor the timeframes for complaint resolution and set targets for continuous improvement in reducing delays and providing timely closure.
83. Take action to improve the organization's ability to constructively resolve member concerns about human rights, harassment and discrimination.
84. Clarify the shared roles of the Office Respect, Conduct & Values and the new EDI Office, particularly with regard to human rights, harassment and discrimination complaints.

SERVICE DELIVERY

In this section we discuss the alignment between findings regarding EDI factors that are primarily internal to the OPS and the delivery of policing service to the Ottawa community. It is the recognition of this alignment that has prompted community members involved in previous OPS consultations to emphasize a "desire for a culture change." Specifically, the 2018 Public Research report concluded:

"In order to work effectively with the community, the OPS needs to [...] take a hard look at its culture. That entails not only improving the **diversity of its workforce**, but adopting an overall **attitude of openness** that involves investigating acts of discrimination and other mistakes among officers and supporting officers in training cultural diversity and mental health."

The four topics in this section are:
- Deployment and operational benefits of diversity
- Traffic Stop Race Data Collection
- Community engagement
- Partnerships

DEPLOYMENT AND OPERATIONAL BENEFITS OF DIVERSITY

Within the scope of the Diversity Audit, EDI is linked to deployment primarily in building the OPS's ability to benefit from diverse skill sets.

FINDINGS

- Community stakeholders and OPS members expressed some dissatisfaction with deployment processes. Specifically,
    - Community groups find that the officers rotate too frequently to gain a solid understanding of the community and its reality.
    - Sworn members mention that their unique skill sets are not leveraged.
- The OPS has very recently (October 2019) implemented three Neighbourhood Resources Teams (NRTs). Officers are assigned for several years and are provided specific training on relationship-building strategies and cultural awareness.
- There is recognition of an EDI tension inherent in providing greater police presence in high-priority neighbourhoods. While helping to satisfy community concerns, it can also lead to "over-policing."

RECOMMENDATIONS

PRIMARY

85. Consider developing a database of OPS member unique skill sets and language capabilities so that deployment decisions can take this into account when appropriate. It will also be a tangible opportunity to demonstrate that the OPS values diverse talent and sees the benefit for its core operations.
86. Report regularly and widely on the results of the NRT pilots.

SUPPORTING

87. Regularly share success stories and positive impacts of the OPS being able to benefit from a member's unique skills.
88. If the OPS undertakes to redesign the background check process (see recommendation under Recruitment), take that opportunity to explore how the known systemic differences in police involvement can be taken into consideration in assessing a candidate.

TRAFFIC STOP RACE DATA COLLECTION PROJECT (TSRDC)

This section examines some areas of intersection between the most recent Traffic Stop Race Data report and the recommendations of the Diversity Audit.

FINDINGS

- The OPS is widely regarded as a leader and best practice organization in its Racial Profiling policy and its commitment to TSRDC research.
- Results from the most recent TSRDC project show that in absolute numbers, Middle Eastern and Black drivers were being stopped far less in 2018 than they were five years previously; however, in relative terms they continue to be stopped at a higher rate than their representation in the population. The rates for young males in these populations are higher than for other age / gender categories.
- The TSRDC researchers have concluded that current results show a need for innovative new approaches to conducting traffic stops that reduce the impact of implicit bias and systemic racism.
- There are areas of good alignment between the Diversity Audit and the TSRDC results, providing an opportunity to embed EDI perspectives into core day-to-day operational work of the OPS and its members.

RECOMMENDATIONS

PRIMARY

89. If the OPS moves forward with a review of the background checking process (see Recruitment section recommendations), the implications of the Traffic Stop Race Data research findings should be considered. Specifically, traffic violations can be a potential barrier to candidates from racialized populations.

SUPPORTING

90. Strike a task team to find 'innovative new approaches' to traffic stops that reduce the impact of implicit bias and systemic racism. To the fullest extent possible, involve front line sworn staff to build better EDI awareness.

91. Integrate the TSRDC report's recommendation of supervisory audits of officer interactions with public with at least two areas of the Diversity Audit's recommendations: those related to enhanced performance management and those related to non-disciplinary learning processes through feedback and reflective practice based on community interactions.

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92. Integrate the TSRDC report's recommendation of educating officers about 'vulnerable decisions points' and 'self-review routines' into the Diversity Audit's recommendations related to EDI training and skill-building. These include detailed recommendations such as: enhancing the integration of unconscious bias awareness and EDI knowledge into operational training programs and scenarios; prioritizing training and skill building of supervisors and Coach Officers; and conducting skill-building and feedback pilots and partnerships with community agencies.

COMMUNITY ENGAGEMENT

This section reports on OPS strengths and gaps in engaging with community(ies) to develop EDI insights and embed EDI perspectives within core OPS operations.

FINDINGS

- The OPS is very active in many community events related to multiculturalism, Pride, youth, etc. This is generally seen by OPS leaders / members and by the community as helpful to a positive and effective police service. Individual member volunteering and community service are valued and recognized.
- The OPS regularly conducts engagement and outreach with community groups and individual stakeholders. There are designated teams focused on Community Development and on Diversity and Race Relations; these individuals are experienced, well-informed and evident EDI champions.
- There is a history of ongoing consultation with community members for efforts such as developing the strategic plan.
- It is not clear that the unintended impacts of some policing practices are explored or monitored in a robust way.

RECOMMENDATIONS

PRIMARY

93. Develop and implement an "EDI lens" or a customized GBA+ tool to guide consultations that will identify potential unintended impacts (positive or negative) of proposed strategic and service delivery decisions.

SUPPORTING

94. With the planned development of an EDI Office and an EDI strategic action plan, determine how best to integrate those efforts with the expertise and commitment of the units involved in community-related EDI efforts.
95. Where possible, collect demographic data when conducting public research and conduct analyses disaggregated by several key variables and intersections.

PARTNERSHIPS

Here we review the OPS's relationships with current and potential partners within Ottawa communities. Our particular focus is on the feedback we received from those networks and agencies with which the OPS already has relationships.

FINDINGS

- There are longstanding networks / committees that connect OPS senior managers to identified communities within Ottawa. Recent efforts have been undertaken to enhance the effectiveness of these groups.
- The new Community Equity Council (replacing COMPAC) has community members who are well-informed and passionate EDI champions. They are interested in taking an active role in partnering with the OPS to advance EDI.
- Some community stakeholders in the Diversity Audit consultation sessions commented that their relationship with the OPS is not as strong or as mutually beneficial as they would hope.
- The OPS is active in community networks and roundtables that bring together a range of stakeholders for a coordinated approach to social challenges within communities.

RECOMMENDATIONS

PRIMARY

96. Prioritize and then invest in reinvigorating some relationships that have a near-term potential for mutual benefits and signalling important change. Opportunities for tangible actions related to building EDI capacity within the OPS could include: direct involvement of community representatives in recruitment/hiring; and/or education of OPS members on community-specific issues and learning-focused feedback. (See relevant sections of this report.)

SUPPORTING

97. Measure and report on the outcomes and impacts of these partnerships. Integrate desired outcomes into the EDI Strategic Action Plan and the OPS Business Plan. Success should not be measured solely by activities; develop a clear shared vision of the desired results.

BENCHMARKING SUMMARY

This section provides benchmarking results to compare the current state of the OPS's EDI practices to a set of external standards. Other benchmarking has been conducted previously by reviewing the OPS workforce characteristics through the OPS Member Census and the Engagement Survey; selected results from those assessments are referenced elsewhere in the Audit.

The widely known *Global Diversity and Inclusion Benchmarks* were chosen as the tool for the Diversity Audit. This section provides an indication of particular practices and the extent to which they are seen as 'best practice.' It also provides an overall rating of the OPS's current state as an organization focused on EDI. These benchmarks capture a point in time. The GDIB tool has been designed to support organizations in assessing their current state and in taking action to move forward.

Benchmarks are helpful for comparisons, measurement and evidence-based decision making. In consultation with the OPS, the *Global Diversity and Inclusion Benchmarks* tool (GDIB) was chosen as the comparator for the Diversity Audit review of OPS practices.

The GDIB is a comprehensive tool that provides standards and promising practices for Diversity & Inclusion in a wide range of organizations. It is a free tool that is sponsored and produced by the Centre for Global Inclusion, a charitable organization that engages with a global and diversified group of diversity and inclusion experts. In total, the GDIB tool presents 268 benchmarks in fourteen (14) categories of operations. Benchmarks are provided at five (5) levels within each of the fourteen (14) categories. The structure is helpful for organizations to assess the current state and to set goals for continued progress.

Benchmarking is not a perfect science. Not all GDIB benchmarks are easily and directly transferable to the OPS or policing context. Nonetheless, they are very instructive and provide a reasonable benchmark for identifying strengths and gaps; for suggesting appropriate next steps; and for monitoring future progress.

To complete the OPS benchmarking we assembled a panel of seven (7) consultants, each with many years of in-depth experience in supporting organizations to move forward on EDI. Four (4) had been extensively involved throughout the Audit and three (3) were primarily external to the project activities. The consultants reviewed the Audit findings and applied their EDI expertise and professional judgment to determine a rating using the GDIB Checklists.

Overall Assessment:

Scoring is a *judgement* as to which level the rater believes the organization generally operates. There is no mathematical calculation to use to determine this.

OPS Today	Global Diversity and Inclusion Benchmarks: Definitions		
	Level 5	BEST PRACTICE	Demonstrating current best practices in D&I; exemplary for other organizations globally.
	Level 4	PROGRESSIVE	Implementing D&I systemically; showing improved results and outcomes.
	Level 3	PROACTIVE	A clear awareness of the value of D&I; starting to implement D&I systemically.
2.7	**Level 2**	REACTIVE	A compliance mindset; actions are taken primarily to comply with relevant laws and social pressures.
	Level 1	INACTIVE	No D&I work has begun; diversity and a culture of inclusion are not part of organizational goals.

The consultants' overall ratings on the 5-point scale ranged from 2.5 to 2.9, with an average of 2.7. This suggests that the OPS is currently advancing from the Reactive level into the Proactive level.

The benchmark checklist assessments on the following pages show that the OPS already has many practices in place that are considered Progressive or Best Practices.

In some cases, similar benchmarks have been rated at two different levels. This typically arose when our findings were that the practice is inconsistent in its application or when recent changes have been initiated but have not yet fully taken hold.

There are opportunities identified throughout the Audit for moving more practices into the advanced levels. The more detailed *Diversity Audit Research Supplement and Technical Appendix* provides greater detail for OPS subject matter experts who may be looking for additional guidance.

GDIB Benchmark checklist results (compiled from 7 consultant ratings)

	Levels 4 and 5: Progressive and Best Practice
✓	**1.6** The majority of stakeholders acknowledge that D&I is important for contributing to the success of the organization.
✓	**2.4** Leaders and board members publicly support internal and external diversity-related initiatives, even if they are perceived to be controversial.
✓	**4.5** Recruitment includes advertising on diversity-focused career websites, using social media, and networking with internal and external diversity groups.
✓	**5.7** Work-at-home, job-sharing, and part-time work is provided for select positions.
✓	**5.9** Health and wellness benefits include education, clinics, fitness centers, employee assistance programs, and preventive healthcare, including mental health issues.
✓	**6.6** Job requirements and descriptions are clear and not confused by non-job-related factors such as gender, school graduated from, religion, age, sexual orientation, disability, appearance preferences, or culturally specific behaviours.
✓	**6.7** There is increased acceptance of flexibility and variety in job design to accommodate employee needs for part-time work, working non-standard hours, working remotely, and taking leave for personal or other reasons.
✓	**7.5** D&I professionals, experts in learning methods and cross-cultural education, and organizational leaders are involved in the development, delivery, and reinforcement of D&I learning and education.
✓	**7.6** A variety of innovative learning methods are used, including classroom, self-study, experiential, eLearning, assessment, social learning, social media, videos, games, and case studies to meet D&I learning needs.
✓	**8.6** Organizational culture is monitored through cultural audits and employee opinion surveys using varied diversity dimensions.
✓	**8.7** The organization invests in research to study D&I for both internal and external purposes.
✓	**9.7** Leaders share D&I information with stakeholders, including survey results, and successes and failures.
✓	**11.7** Community involvement reflects long-range planning and supports most segments of the population.
✓	**11.9** Employees are encouraged to volunteer in their community. In some cases, the organization "loans" them to work for non-profit organizations.
✓	**13.4** Diverse groups of customers and potential customers are surveyed on needs and satisfaction. The results shape marketing, sales, distribution, and customer service strategies.
✓	**13.9** Agencies and consultants with expertise in diversity and inclusion provide advice when needed.

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	Level 3: Proactive
—	**1.9** The organization has examined its systems, practices, requirements, and organizational culture and created strategies to reduce barriers to inclusion.
—	**1.12** D&I qualitative and quantitative goals that include input from a variety of internal and external stakeholders are being developed.
—	**3.10** There is a D&I champion / leader and staff with responsibility for D&I.
—	**3.11** A few diversity networks with budget and resources exist.
—	**3.12** An organization-wide D&I council / committee is given visible support by leaders, represents internal stakeholders, and impacts D&I efforts.
—	**3.13** Some budget has been allocated to cover D&I implementation.
—	**3.16** D&I staff are called upon for advice, counsel, and content expertise.
—	**4.12** The workforce is beginning to reflect the diversity found in the organization's qualified labour market, but there is still underutilization of certain groups in mid-level and senior-level positions and some functions.
—	**4.13** Managers are educated in understanding differences and the impact their biases may have on selection, development, and advancement decisions.
—	**5.14** Paid leave is provided for healthcare, civic responsibilities, bereavement, and so forth.
—	**5.15** Religious practices and cultural holidays are mostly accommodated even if they are not the holidays of the majority.
—	**5.17** Technology support for mobility, disabilities, and flexible work arrangements are available for select employees.
—	**7.10** D&I is integrated into the organization's overall learning and education programs, including employee orientation, customer service, and management programs.
—	**7.12** Training programs address sometimes-sensitive issues of privilege, stereotypes, bias, and "isms" and include development of skills to address those issues.
—	**7.13** D&I experts or learning professionals build D&I into every stage of the learning design and/or conduct the D&I learning programs.
—	**7.14** The organization encourages cultural celebrations and organization-wide activities that combine social interaction with D&I learning.
—	**9.14** The organization's external website features information about its D&I vision, strategy, goals, and results.
—	**10.12** The organization makes a concerted effort to integrate diverse voices and perspectives early and often in all sustainability efforts.
—	**11.11** The organization partners with other organizations that work to advance the rights of vulnerable groups in the community.
—	**11.13** Long-range community development plans are formulated with diverse groups including local governments and community leaders.
—	**13.10** Some attempt is made to reach a diverse range of customers by using market-specific media.

	Levels 2 and 1: Reactive and Inactive
!	**1.14** D&I is narrowly defined, referring only to some under-represented groups. The focus is primarily on numbers of people from various groups represented at different organizational levels.
!	**1.15** Equal opportunity, disability access, age discrimination, or other diversity-related policies have been adopted primarily to meet compliance requirements and prevent damaging legal action or publicity.
!	**2.14** Leaders are generally unfamiliar with D&I and require instructions or scripts to discuss it.
!	**2.15** Although leaders accept some responsibility for D&I, the focus is mainly on compliance.
!	**2.16** Leaders consistently avoid or are reluctant to address challenging D&I situations.
!	**4.17** The hiring focus is based primarily on representation to meet diversity or equity goals or targets.
!	**4.18** Recruitment practices do not include diverse candidates as a matter of procedure for all positions.
!	**4.19** Development and advancement systems do not focus on including diverse candidates.
!	**4.20** Recruitment and development systems do not take into account how people from different cultures and backgrounds may respond to interview questions.
!	**5.19** Work schedules are generally traditional, inflexible, and compliance-driven.
!	**5.20** Flexibility may be misunderstood, applied unfairly, or perceived as favouritism.
!	**7.16** D&I learning is brief and focused only on educating employees about policies, meeting legal requirements, or assisting with language use.
!	**8.14** Some feedback on D&I is solicited in employee and customer surveys, market research, internal reviews, or climate studies, but there is no follow-up, no rewards, and no consequences for poor performance.
!	**8.15** Representation of members of groups of some diversity dimensions are monitored, but only if required by law.
!	**8.16** Measurements are primarily based on past negative indicators, such as turnover, lawsuit, and complaints.
!	**9.15** D&I communication is done solely to remind or educate employees about adhering to policy and compliance requirements.
!	**9.16** The majority of D&I communication is disseminated by councils / committees or diversity networks rather than through regular organizational channels and thereby seen as not officially endorsed by the organization.
!	**9.19** Organizational communication is not analyzed or adjusted for appropriateness regarding D&I.
!	**10.14** There is some effort to connect D&I with organizational goals relating to sustainability, such as community development partnerships, volunteerism, or peace-building activities.
!	**10.15** There is some involvement in incorporating D&I in organizational and societal goals, such as including a diverse array of external stakeholders in assessing how the organization's practices affect its wider community.
!	**12.14** There is limited interest in developing or altering products and services based on customer preferences or demographics.

NEXT STEPS: IMPLEMENTATION AND MEASUREMENT

The OPS has undertaken the development of a strategic action plan to guide the implementation of next steps arising from the Diversity Audit and other EDI initiatives. There is no need for us to repeat those efforts here.

In this final section we draw the reader's attention to three critical considerations:

- The ten "Vital Recommendations"
- The challenge of measurement
- The power of communication

THE TEN "VITAL RECOMMENDATIONS"

The Diversity Audit report provides close to 100 recommendations; the detailed *Diversity Audit Research Supplement and Technical Appendix* contain 25 additional tips. While we have acknowledged that much good work has been done, it is clear that much work still remains. It will be important for OPS to make considered decisions on the Primary and the Supporting Recommendations and then track and monitor implementation and results. This is standard best practice after completing any review or audit.

However, there are ten "vital recommendations" highlighted in the Executive Summary as being of critical importance. These are the actions that are critically important for signalling commitment, creating a foundation for sustainable change, and generating momentum at this pivotal time. Taken as a whole, they will drive powerful progress.

THE CHALLENGE OF MEASUREMENT

Strategic goals require strategic measurements that focus on observed results and outcomes. We have recommended that the OPS define their vision of an equitable, diverse and inclusive workplace and set related measurable objectives. None of these three (3) EDI elements can be perfectly assessed.

The first question in selecting measurements should be, "does it reflect something that matters, something that makes a difference in the OPS's ability to successfully deliver on its mandate of community safety?" Imperfect measurements can be validated and confirmed with other indicators. The level of significant change that the OPS and its stakeholders are hoping for is not to be found in decimal points. Consistent shifts and themes will tell the important story.

THE POWER OF COMMUNICATION

We suggest that there are three (3) considerations in communicating about the Diversity Audit and EDI plans:
- The narrative must change. EDI is not a 'zero sum' game of winners and losers. Everyone benefits from a workplace characterized by equity, diversity and inclusion. It is an operational imperative for an organization like the OPS.
- If a picture is worth a thousand words, then perhaps a behaviour is worth a thousand stories. In our experience of conducting the Diversity Audit, the power of anecdote was striking. Leaders, in particular, must be role models.
- Communication about EDI happens in daily interactions and conversations. These will sometimes be difficult. They must be authentic.

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ABOUT GRAYBRIDGE MALKAM

For almost 30 years, Graybridge Malkam has helped organizations and individuals in Canada and around the world enhance their potential and improve their performance. We are a leading provider of training, research and consulting services in equity, diversity and inclusion (EDI), intercultural competency, and language acquisition. Graybridge Malkam supports organizations across all sectors in their journey to achieve a transformative culture and address human resource and workplace challenges.

For more information, visit our website at www.graybridgemalkam.com