Dear Mayor & City Councillors of Hamilton,

Re: Hamilton Centre for Civic Inclusion Response to City of Hamilton Equity, Diversity, and Inclusion (EDI) Framework

We congratulate the Dept of Human Resources for their great work and dedication into drafting recommendations to advance Equity, Diversity, and Inclusion at the City of Hamilton. Well deserved congratulations to Lora Fontana (Executive Director - Human Resources) and Jodi Koch (Director Talent and Diversity) and her team for providing Council with an extensive road map.

HCCI would like to offer thoughts, perspectives, guidance, and advice on the recommendations offered in the EDI framework. We offer these suggestions not as criticisms but as added value from a community organization that has been doing this work for over 18 years in the city.

Response to Recommendations

a) City Manager to be identified as the Diversity and Inclusion Champion for the City of Hamilton.
   Response: To build a culture of inclusion, it is important to acknowledge the work being done by current employees at the City that have been working on these issues for days, months, and years. Many of these employees sometimes face backlash from their supervisors and sometimes their work is undervalued. HCCI believes they should be the Diversity and Inclusion Champions. It is important to have more than one champion as this lets employees and residents know that there is a diversity of thought, acknowledgement of different perspectives and seriousness to organizational change. The City Manager can and should be a champion for the City on Diversity and Inclusion but there should be and there are other champions. The Ontario Council of Agencies Serving Immigrants uses this approach.1

b) Develop & Implement a Diversity and Inclusion Steering Committee
   Response: This is a great idea since it is based on the Organizational Development Model of implementing an EDI approach. This approach is preferred for its clear focus, management driven style, and provides organizational security. However, this method is difficult to sustain, relies heavily on educational programs, policy changes and accountability measures. It also puts a strain on the Human Resources department to do the implementation, thus removing responsibility from managers, Councillors, and other staff.2

c) Competitive procurement process for anti-racism, anti-oppression, unconscious bias, and inclusionary practices.
   Response: There are numerous times where procurement processes favour outside consultants. Holvino et al advise that organizations implementing diversity frameworks need to leverage the work done by in-country and in-city resources to ensure that local context and issues inform EDI strategies.3 These local resources may include but are not limited to Universities (McMaster University, Mohawk College, College Boreal), local research organization (Social Planning and Research Council), Social Action Groups (Hamilton Acorn, Disability Justice Network of Ontario, Campaign for Adequate Welfare and Disabilities, Hamilton Roundtable for Poverty Reduction, etc.), and other profit (Lura Consulting etc) and non-profit organizations (Environment Hamilton, Empowerment Squared, Hamilton Regional Indian Centre, YWCA etc) and Youth Groups (Spectrum, THE SPACE) working on EDI.

1 OCASI Accessibility Champions Program https://ocasi.org/accessibility-workshops
2 Holvino, Ferdman, Merrill-Sands, Creating and sustaining Diversity and Inclusion in Organization: Strategies and approaches
3 Holvino, Ferdman, Merrill-Sands, Creating and sustaining Diversity and Inclusion in Organization: Strategies and approaches
d) Mandatory training to be delivered to Council members, the Senior Leadership Team, all Supervisor and above employees, and Union Executive Leadership in 2020.
Response: This is a great step to move forward. In addition to training all mentioned above, Holvino et al state that visions of inclusion in organizations should be achieved on three levels, namely systemic/structural, cultural, and behavioral. Most of the recommendations outlined in the EDI document focus on trainings and not actionable systematic and cultural changes. Please refer to the “Working Group on Racial Equity” submission to Council on April 3\textsuperscript{rd}, 2001. In the submission they talk about creating a Standing Committee that strictly deals with issues around race, I would amend that to a Standing Committee on Equity, Diversity, and Inclusion. This is an example of a Systematic/Structural change to specifically look at developing substantive change at all levels of the City. Other examples of Systematic/Structural change include but not limited to recruitment practices & retention programs, employment surveys on work place environment, and mentoring programs for equity seeking groups.

Source options for systems/process enhancements to support Diversity and Inclusion metric dashboard requirements
Response: One question still remains: what are the gaps that the EDI framework is addressing? What are the objectives, actions, and outcomes of the recommendation? It is HCCI’s position that until specific objectives are outlined in the EDI framework we will be collecting metrics that don’t advance values and principles of EDI.

Equity, Diversity, and Inclusion 2020 training and community engagement components
Response: Community engagement components sound great, it is however, evident that a number of City departments and employees haven’t built the necessary trust and relationships with many organizations and residents doing this work. Organizations like the Hamilton Legal Clinic, Hamilton RoundTable for Poverty Reduction, Disability Justice Network of Ontario, McMaster University Community Engagement Office, McMaster University Professors, Sexual Assault Centre for Hamilton and Area and many more. These orgs along with residents are operating their organizations with an anti-oppressive and anti-racism framework.

Report back from Staff by June 17 2020 with status update respecting the implementation of the Equity, Diversity and Inclusion process. Matters respecting Equity, Diversity, and Inclusion Framework be considered complete and removed from the General Issues Committee’s outstanding business list.
Response: If the City is truly serious about advance principles and values of EDI this should actually be a standing agenda item. The fact that recommendations have been presented doesn’t mean that these issues should be left to the Human Resources department to deal with. There needs to be a separate Standing Committee to ensure effective and accountable work is done.

Summary
Holvino developed a framework she calls Model of Multicultural Organizational Development, as seen below. If one is to adhere to her model of six phases of developing a strong EDI organization, I would state that the City of Hamilton is currently in a Transitional – Compliance stage. This stage describes an organization that is passively committed to including other without making major changes, as seen in a number of policies that have been drafted in the last three months, and a number of ongoing projects under the city’s purview. It is our estimation that to get to phase six the following questions need to be addressed:

- What theoretical and methodological analysis is being used to frame the work?

\textsuperscript{4} Holvino, Ferdman, Merrill-Sands, Creating and sustaining Diversity and Inclusion in Organization: Strategies and approaches
\textsuperscript{5} http://www2.hamilton.ca/Hamilton_Portal/Inc/PortalPDFs/ClerkPDFs/committee-hearings/2001/apr17/Item4.1.PDF?fbclid=IwAR12Kwo04cAkPtGoxfIkptdmGsMkTfzCQp_QE2H80DYGPOAaxuxSPTxHb6w8
Hamilton Centre for Civic Inclusion (HCCI) is a community based organization with a mandate to create a welcoming and inclusive city.