Hamilton
OFFICE OF THE
AUDITOR GENERAL

# Equity, Diversity, and Inclusion Audit



## December 7, 2023

### Office of the Auditor General

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# Executive Summary

1.  On February 19, 2019, Hamilton City Council passed a motion containing seven directions to City staff, including "staff be directed to prepare a report on the steps that would be required to implement an equity-diversity-and-inclusion lens framework to City policy and program development, practices, service delivery, budgeting, business planning and prioritization…"

2.  This motion complemented the 2018-2022 Term of Council Priorities which included Equity, Diversity, and Inclusion (EDI) with the stated goal of "equity-seeking communities will feel safe, supported and have an enhanced sense of belonging through strengthening community capacity, City responsiveness and creating inclusive engagement opportunities." This priority was also aligned with the 2016-2025 Strategic Plan high-level priorities of Community Engagement & Participation and Culture and Diversity.

3.  The Office of the Auditor General (OAG) performed an audit that evaluated and assessed the management of progress made on EDI efforts at the City of Hamilton resulting from this Council direction.

    The audit included the three areas below:

    - Internal EDI assessed the EDI Framework and work related to its implementation within the organization by the Human Resources' Division's Talent and Diversity's Section (HR EDI).

    - External EDI (Community EDI) assessed EDI-related efforts led by the Office of Government and Community Relations in Hamilton, with a focus on community engagement, e.g. supporting Urban Indigenous Strategy implementation and citizen advisory groups such as the Committee against Racism.

    - Service Delivery assessed efforts to ensure EDI has been embedded into City services delivered to residents and businesses.

4.  The most significant issues identified by the OAG in this audit were governance, lack of risk assessment and change management in the planning and implementation of EDI. For Community EDI and Service Delivery there are not any overarching strategies and objectives on how or what to achieve.

5.  Overall, the OAG sought to answer the question "Is the City set up for a successful implementation of EDI throughout the organization?". We sought to answer this question by focusing our work in three areas, 1-internally, as an employer, 2-when engaging with the community in community and public engagement, and 3-in City service delivery. The OAG finds that the City is not currently set up for assured success. Some progress has been made, but more needs to be done, particularly for some fundamental items that are required as the foundation of EDI efforts at the City of Hamilton.

6    A Corporate EDI Framework has been developed and is in the process of being implemented; however, there is no fully developed Project Management Plan (PMP) for the implementation of the EDI (now IDEA) framework.

7    The work done to date is good, but the efforts need to be executed in a more systematic and methodical way. As such, the City's data collection and metrics are still in the early stages and need to more meaningfully inform the City on the barriers to equity, diversity, and inclusion and/or its progress towards addressing these issues.

8    For EDI efforts, EDI implementation and governance should not be the responsibility of the HR EDI team alone. HR EDI should use the established Framework to help guide the individual Departments and other Divisions with their own, specific EDI-related goals. HR's EDI work should focus on their purview (recruitment, promotion, retention, etc.), and be a resource for EDI (e.g. provide training), but the responsibility for implementing EDI in the organization should be with the individual Departments and Divisions and could be overseen by a formal Steering Committee supported by HR EDI.

9    The HR EDI team proposed and implemented a form of EDI Steering Committee to help with EDI implementation but in its current deployment, it does not function as a conventional steering committee. It is more of a liaison group or departmental advisory committee. One of the duties of a steering committee is to oversee and support a project to ensure the attainment of its goals. Having the right governance structure ensures accountability and oversight of initiatives / strategies that impact more than one department or division. This would also address the concern where several staff in various service delivery areas have said Corporate support is needed to help service and program areas to develop their own strategy for embedding EDI in business processes.

10   We found the initiative lacks a comprehensive, corporate project plan, strategy and direction to City Departments and Divisions for achieving EDI goals. There are very limited tools and resources to support achieving the organization's EDI goals, particularly for Community EDI and Service Delivery.

11   That being said, we do recognize some service areas have made efforts towards the goals, such as having retained or intending to retain an equity specialist whose job would be developing EDI strategy for their service areas; and embedding EDI in its 5-year Economic Development Action Plan, etc. Further, these efforts have laid the foundation so the City can continue to build up the strategies, project plan and corporate direction to move the City towards its EDI goals.  Without an effective corporate governance model for EDI efforts, Departments and Divisions will continue in their service delivery efforts without clear corporate direction and EDI efforts will be less effective than they could be.

12   In late 2022, EDI was rebranded as IDEA (Inclusion, Diversity, Equity and Accessibility) to include the Accessibility work done by the HR Talent & Diversity team. As EDI was the term when the audit started and was the focus of the audit, we use the term EDI in this audit report.

13    Overall, OAG has made 33 recommendations in the Recommendation Report (Appendix "B" to Report AUD23013) which will address the key audit findings, with a focus on EDI implementation from a project management perspective.

# Introduction and Background

### The City of Hamilton's Equity, Diversity, and Inclusion Actions

14    Some demographic data for Hamilton per the Statistics Canada 2021 Census is below:

**Figure 1: City of Hamilton Demographic Data**

| Demographic Category | Hamilton, 2021 | |
| --- | --- | --- |
| | Total Population | Population 15+ in Labour Force |
| Men | 49.2% | 52.0% |
| Women | 50.8% | 48.0% |
| Indigenous | 2.2% | 2.1% |
| Visible Minority | 25.1% | 24.7% |
| Persons w/a Disability | 39.1% | 35.8% |

Source: Data is derived from custom tabulations of Statistic Canada's 2021 Census obtained by the City of Hamilton as a consortium member of the Canadian Community Economic Development Network (CCEDNet) Community Data Program.

Below is data from the Employment Equity Survey as reported by Human Resources showing the make-up of the City of Hamilton's employee population in 2021 (note: response rate to this survey was below 80%).

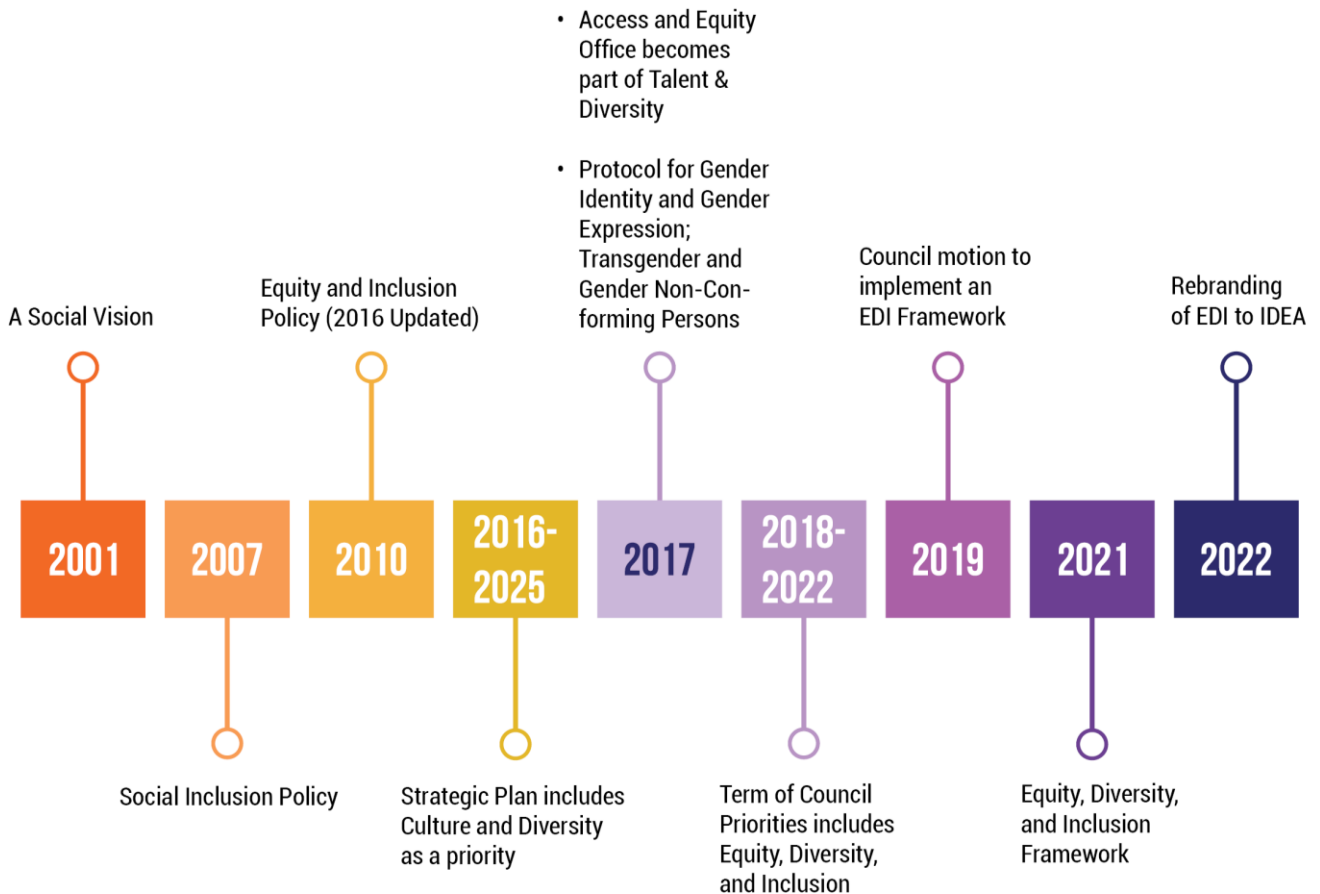| Employment Equity Data | Self-Identifies as | | | |
| --- | --- | --- | --- | --- |
| | Woman | Aboriginal/ Indigenous | Visible Minority/ Racialized | Person with a Disability |
| City of Hamilton Staff Survey (ACTIVE RESPONDENTS (2021) | 48.8% | 2.2% | 12.0% | 5.6% |

Source: Report to Council HUR19019 (c) Appendix B, from November 30, 2022.

15    There have been previous efforts in the City of Hamilton (the City) to attempt to address equity, diversity, and inclusion. Starting in 2001 with "A Social Vision" which was a Social Development Strategy document for the City of Hamilton that included a description of Hamilton as "a vibrant community which promotes support for basic needs as well as inclusion and learning for all. Inclusion involves recognition of respect for diversity."

16    In 2007 a Social Inclusion Policy was proposed with the intent of acknowledging the impact that social barriers like poverty, language, ability, racism, and classism have on the ability of a

person to participate fully in life within a community. The OAG could not find any evidence of an actual policy and/or its implementation.

**Figure 2: Timeline of EDI Efforts**

## Timeline of EDI Efforts

- Access and Equity Office becomes part of Talent & Diversity

- Protocol for Gender Identity and Gender Expression; Transgender and Gender Non-Con-forming Persons

Equity and Inclusion Policy (2016 Updated)

Council motion to implement an EDI Framework

A Social Vision

Rebranding of EDI to IDEA

| 2001 | 2007 | 2010 | 2016-2025 | 2017 | 2018-2022 | 2019 | 2021 | 2022 |

Social Inclusion Policy

Strategic Plan includes Culture and Diversity as a priority

Term of Council Priorities includes Equity, Diversity, and Inclusion

Equity, Diversity, and Inclusion Framework

17    One of the earliest City policies regarding equity, diversity, and inclusion was the Equity and Inclusion Policy created in 2010. The Policy was developed "to enhance and strengthen Council's decisions and to apply the principles to all City of Hamilton's processes, policies, practices, programs, services, opportunities, actions, corporate strategic plans and departmental goals in ensuring beneficial outcomes and improved quality of life for all of the City's internal and external stakeholders."

18    There are three principles that underpin this City policy:

- The principle of Equity which reflects the City's inherent belief in the human rights of all persons.

- The principle of Inclusion which creates a sense of belonging.

- The principle of Diversity that validates the sum total of potential found in any group of people.

19   The administration of this policy fell under the Access and Equity Office, which became part of the Talent and Diversity office in 2017. The Talent and Diversity Office includes the current Diversity and Inclusion Section within the Human Resources Division (HR EDI).

20   This policy was updated in 2016 to include the term "Gender Expression." It is currently being revised as part of the ongoing internal EDI implementation work by HR EDI.

21   In 2016, the ten-year Strategic Plan (2016-2025) for the City was approved by City Council and there were seven priorities, including Culture and Diversity: "Hamilton is a thriving, vibrant place for arts, culture, and heritage where diversity and inclusivity are embraced and celebrated."

22   A trigger event that brought diversity and inclusion into the spotlight was the legal settlement in 2016 between the City and a transgender woman respecting a human rights application after the woman was denied entry to the woman's washroom and instead, was offered a universal washroom at one of the City's facilities.

23   The settlement included an agreement to codify specified City practices with regards to the protected grounds of gender identity and gender expression and the rights of transgender and gender non-conforming persons. The Protocol for Gender Identity and Gender Expression: Transgender and Gender Non-conforming was created to meet this obligation and was approved by Council in 2017. Additionally, Transgender Protocol training is mandatory for all new employees.

24   In 2017, a Diversity and Inclusion Strategic Plan was developed by HR's Diversity and Inclusion office. The strategic plan is at a very high level. The Diversity and Inclusion Strategic Plan set the priorities of the Diversity and Inclusion team as follows:

- Legislative and policy compliance

- Education

- Workplace diversity

- Database and metric tracking

- Workplace inclusion

25   The Diversity and Inclusion Strategic Plan objectives were:

- To ensure all aspects of our City are built on the principle of human rights, diversity and inclusion

- To create, foster, support and ultimately sustain a City culture whereby all people feel a strong sense of inclusion, empowerment and opportunity to develop and growth.

26   In 2018, Equity, Diversity, and Inclusion was included in the 2018-2022 Term of Council Priorities. The priority states, "The City is committed to creating and nurturing a city that is welcoming and inclusive."

   • The goal of this priority is that *"*Equity-seeking communities will feel safe, supported and have an enhanced sense of belonging through strengthening community capacity, city responsiveness and creating inclusive engagement opportunities."

27   This priority was aligned to the ten-year Strategic Plan priorities of Community Engagement & Participation, Culture and Diversity, and Our People & Performance.

28   A motion approved by City Council in February of 2019 was the most recent effort to address EDI for the City. In 2019, as part of the Council-approved motion, staff was directed to look into what would be required to implement an "equity-diversity-and-inclusion lens framework to City policy and program development, practices, service delivery, budgeting, business planning and prioritization."

29   One item in the 2019 Council-approved motion stated that "the City's Internal Audit services conduct an Equity, Diversity and Inclusion (EDI) Audit, city-system wide, to establish the baseline as it relates to City policy, program development, hiring and staff development practices, service delivery, budgeting, business planning and prioritization by which to measure progress annually." As a result, an audit of EDI implementation by the City was put on the 2019-2022 Audit Workplan.

30   In September 2021, Ernst and Young (EY) and the HR Director of Talent and Diversity presented to Council an EDI Framework, which was approved by Council. This framework and the work to implement it was reviewed as part of this audit.

31   To support the implementation, a Senior Project Manager (SPM) EDI was hired in Q2 2022, and an EDI Human Resources Business Partner (BP) was hired in Q3 2022.

## Community EDI Implementation

32   In 2019, community priority population programs/services that used to be within the Community Initiatives portfolio under Healthy and Safe Communities were restructured. While most work in the portfolio remained within the Healthy and Safe Communities Department, the 25-year Community Vision – Our Future Hamilton, Strategic Public Engagement and Community Initiatives, together with 2 Full Time Equivalent (FTE) employees were transferred to the City Manager's Office. In 2021 this work was moved, reporting to the Director of the Office of Government and Community Relations. Today, the community relations work performed and overseen by this Office includes:

   • Corporate-wide Public Engagement

   • Hate Mitigation & Prevention Action Plan

- Distribution, development coordination, programming and funding of the City Enrichment Fund

- Overseeing the funding and service agreement with Hamilton Anti-Racism Resource Center (HARRC)

- Community inclusion objectives such as fostering community partnerships and relationships on behalf of the City of Hamilton (including inclusion campaigns – Hamilton for All, Salam Hamilton, representation on various community working groups and network tables.

- Ongoing Support and Oversight of five Citizen Advisory Committees:
  o Mundialization Committee
  o Immigrants and Refugees
  o Women and Gender Equity
  o Committee Against Racism
  o Advisory Committee for Persons with Disabilities
  o LGBTQ Committee – moved to the Healthy and Safe Communities Department in early 2023 to align with the Community, Safety & Well-being Plan

33   The Office also provided collaborative support to the Urban Indigenous Strategy and Community Safety and Well-being Plan that were developed in consultation with community partners and whose creation was led by teams from the Healthy and Safe Communities Department.

34   In 2020, resulting from Council direction, Sage Solutions Inc was engaged for consulting work to:
- Review the City's draft policy, procedures and Trespass By-law on hate mitigation and provide advice based on best practices and public input.

- Engage the community and garner input from residents, equity-seeking groups, and other key community stakeholders on current hate-mitigation policies and strategies.

- Produce and present public consultation findings on hate-mitigation policies and procedures, as well as other broader ideas to combat hate.

35   In August 2021, 18 recommendations were presented to Council (at the General Issues Committee-GIC) at the conclusion of Sage Solutions' work, of which four of the recommendations were considered out of the jurisdiction of the City.

36   The 18 recommendations were grouped in the following four themes:

- **Proactive Leadership** included four recommendations, called for the City to take the lead condemning hate activities and promote positive values, establishing a well-informed response to stand against hate, resource and implement an action plan to confront systemic racism, oppression and other forms of discrimination.

- **Centring Communities** included seven recommendations, called for collaboration with community partners and stakeholders to initiate convergent strategies to combat hate, focus on prevention, increase diverse representation at decision-making tables and invest in safe community spaces.

- **Education and Early Intervention** included two recommendations, called for early education starting from school curriculum on prevention of racism and hate, equity, diversity, inclusion, justice and belonging, partnership with school boards and community organization. Invest in placemaking initiatives that encourage diverse community interactions across groups.

- **Regulations and Enforcement** included five recommendations, called for standing against hate beginning on City properties, build a coordinated community reporting system and collaborate with Police Services.

37   The Office of Government and Community Relations proposed seven action plans to address these recommendations.

## EDI in Service Delivery

38   One of the motions from the February 2019 Council meeting referenced above was that an implementation of the equity, diversity, and inclusion lens begin in the City's Housing & Homelessness Strategy and service delivery. To address this, the Housing and Homelessness Action Plan (HHAP) developed by Housing Services in 2013 was reviewed and revised in 2019 and 2020. According to the 2020 version of HHAP, a formal equity, diversity, and inclusion framework and Gender Based Analysis Plus (GBA+) are to be developed to ensure they are effectively meeting the specific needs of the people who need them.

39   Most of the progress the City of Hamilton has made so far was in response to legislative requirements. Examples include:

- Accessible transportation (DARTS, transit infrastructure).

- Accessible facilities (park benches, braille in City buildings).

- Inclusion programming in Recreation Centers operated by the City.

40   The Economic Development Action Plan (EDAP) included two actions to address EDI as a result of recognizing the importance of the contribution of immigrants to economic growth and the labour force in Hamilton. The Planning and Economic Development Department also manages the Placemaking Pilot Grant program which encourages community interaction to embrace EDI.

41   In addition to the six permanent program areas of funding under the City Enrichment Fund, a pilot grant program for digital equity was added and aimed to be operationalized in 2023/2024. In addition, a set of new EDI questions was included in the grant application intake process to inform grant award decision making.

## Audit Objective

42    The objective of the audit was to assess whether the City has a sound plan and strategy, as well as the management of tools and resources to support and achieve the EDI goals as stated in 2018-2022 Council Terms of Priorities, that "equity-seeking communities will feel safe, supported and have an enhanced sense of belonging through strengthening community capacity, City responsiveness and creating inclusive engagement opportunities." At the time of audit fieldwork, the 2023-2026 Term of Council Priorities had not yet been finalized.

## Audit Scope

43    The scope of the audit included reviewing the HR EDI framework, current strategies, project management activities, roadmap and action plans in both Human Resources and the Office of Government and Community Relations, and EDI implementation in the City of Hamilton's service delivery.

## What We Did

44    To address City Council's February 19, 2019 motion to perform an audit "to establish the baseline as it relates to City policy, program development, hiring and staff development practices, service delivery, budgeting, business planning and prioritization by which to measure progress annually," the OAG divided the audit into the following areas of focus.

- Internal EDI led by Human Resources Talent & Diversity's EDI team (HR EDI)

- External (Community) EDI led by Office of Government and Community Relations

- EDI implementation in service delivery for the following areas:

  o Children's and Community Services, Housing Services, Recreation, and Family Health in the Healthy and Safe Communities Department

  o Transit, Parks and Cemeteries in the Public Works Department

  o Tourism and Culture, Planning, Small Business and Business Investment in the Planning and Economic Development Department

  o CityHousing Hamilton

45    For these three areas OAG performed the following procedures:

- Gained an understanding of the history of EDI efforts in the City.

- Gained an understanding of the work completed to-date and in progress on the Internal and External (Community) EDI implementation as well as what is being done in City service delivery.

- Reviewed the work and recommendations of consultants, as applicable, in the three areas.

- Performed relevant testing and review of policies and procedures to verify/validate progress made to date on EDI implementation.

- Assessed the City's procedures and structures in place to implement and manage EDI implementation.

## How We Did It

46
- Reviewed documentation such as strategic and project management plans, policies and procedures, contracts, RFPs, and Council Reports related to current EDI implementation efforts.

- Reviewed webpages with information related to EDI implementation including Divisional webpages regarding services and programs.

- Interviewed relevant staff, including over 60 staff members across the organization in the three areas, including four current General Managers (GM).

- Reviewed available data, metrics, and performance measures, as applicable.

- Researched EDI literature, websites, and other municipalities' work.

## What the Scope Did Not Include

47  This audit did not include a review of all service areas in all Departments, a sample of service areas were selected for review for the audit.

## Key Terms

48  The definitions below were provided by Human Resources Talent & Diversity group from the Corporate New Employee Orientation (CNEO) Equity, Diversity and Inclusion (EDI) training available to new employees.

**Accessibility -** Inclusive practice of ensuring everyone along the continuum of human ability and experience can acquire the same information, engage in the same interactions, and enjoy the same services in an equally effective and integrated manner with substantially equivalent ease of use.

**Diversity -** A term used to encompass the acceptance and respect of various dimensions such as race, gender, sexual orientation, ethnicity, socio-economic status, religious beliefs, age, physical abilities, place of origin, and education.

**Equity -** A condition or state of fair, inclusive, and respectful treatment of all people. Equity does not mean treating people the same without regard for individual differences.

**Inclusion -** The extent to which diverse members of a group feel valued and respected. It is often referred to as a sense of belonging.

The definitions below were provided the Office of Government and Community Relations:

**Community Engagement -** Community engagement refers to a strategic process, intention, or action with the goal of facilitating interactions, building relationships, and working collaboratively with identified groups of people, whether they are affiliated by a geographic location (community of place), a community of similar interest, or a community of affiliation or identity, to affect positive change.

**Public Engagement -** Public engagement or public participation is viewed as any intentional process that involves the public in problem solving or decision-making and uses public input to inform decisions.

**Barrier -** A barrier is anything that keeps an individual or group from participating fully in an activity. A barrier can be visible, invisible, environmental, physical, economic, social, or political. Barriers prevent full communication, working together, and progress or achievement.

**Equity-Seeking Groups** - Equity-seeking groups are those that identify barriers to equal access, opportunities and resources due to disadvantage and actively seek social justice and reparation.

The definition below is taken from Statistics Canada:

**Visible Minority** - refers to whether a person is a visible minority or not, as defined by the *Employment Equity Act*. The *Employment Equity Act* defines visible minorities as "persons, other than Aboriginal peoples, who are non-Caucasian in race or non-white in colour". The visible minority population consists mainly of the following groups: South Asian, Chinese, Black, Filipino, Arab, Latin American, Southeast Asian, West Asian, Korean and Japanese.

## Detailed Findings

## Governance and Risk Management - Who is Responsible?

49    A greater focus on change management at the organizational level is needed to prepare, equip, and support staff in moving towards embedding EDI in day-to-day work at the City and in the way the City delivers its services.

50    Additionally, a formal risk assessment has not been performed for EDI implementation. A risk assessment helps management identify goals, obstacles, and gaps along the way (risks), and determine strategy to mitigate the risks. For a long-range project as EDI implementation, it

would help in determining what the goals are in the short-term and what the goals are for the long-term, and subsequently how resources can be prioritized to meet these short term and long-term goals. It can help to realistically assess what can be achieved in the short- term and how much the City can commit to on an annual basis to help relieve the pressure on the organization and manage stakeholder expectations throughout this journey.

51    Further, the City of Hamilton budget process has yet to formally embed EDI considerations in the budgeting process, nor is there a budget set aside to support embedding EDI in service delivery. Having said that, some areas have funded or intend to fund an EDI specialist, which is important. Budgeting with EDI considerations in service delivery would help to address the issue of equitable provision of services and programs to diverse groups and enable the City to measure and track the investments it makes in embedding EDI into the City's service delivery.

## Internal EDI

## EDI Framework Development

52    OAG reviewed the work done by Ernst & Young (EY) which informed the EDI Framework being implemented and the related systemic initiatives. We did find some issues with the deliverables that pose challenges in the development of the Framework and initiatives.

53    The cultural assessment survey, on which EY's assessment of City culture and subsequent recommendations were based, was not representative of City staff. For example, the 43% response rate is of those who were sent the survey link via email. There are a large group of employees without City email addresses. The OAG estimates that the survey responses represented only 27.5% of the total employees at the time.

54    From a review of the cultural survey results, it is not clear to the OAG how or whether the tool rigorously gauged equity or diversity. The only item the OAG noted was a question that asked: do you think we have a diverse workforce? The survey had more questions regarding day-to-day general work environment/culture and broadly gauges inclusivity. The OAG finds it to be similar to the City's Our People Survey which was sent out four months later.

55    An Executive Leadership Assessment (ELA) was done with the Senior Leadership Team (SLT) team at the time. The ELA is a one-on-one consultant-led assessment with SLT members to provide tailored development plans for areas and ownership for driving behaviour changes related to EDI. This along with the cultural assessment was meant to be done annually but were not. These were intended to be measures of progress/impact of our EDI implementation progress.

56    Additionally, EY proposed six systemic initiatives which were recommended as part of the Framework to implement EDI within our organization. The initiatives and key activities are shown in Figure 3 (Summary of EDI Roadmap):

**Figure 3: Summary of EDI Roadmap**

## Summary of EDI Roadmap — Summary of Systemic Initiatives

Following data collection and analysis from multiple sources – EDI diagnostic survey, Leader Interviews, Focus Groups, and a Senior Leadership Team Workshop – the following systemic initiatives were recommended in the EDI Framework

**1**

### BUSINESS CASE

Create EDI business case to outline the benefits of EDI and how it impacts business performance and the City's overall objectives

**Key Activities:**
- Assemble the EDI business case team
- Define the business case
- Implement business plans and set up review cycle
- Communicate business case

**2**

### COMMUNICATIONS PLAN

Create an organization-wide communications plan that includes an EDI calendar, campaign and community events

**Key Activities:**
- Broadcast Leadership's commitment to EDI
- Create EDI communications campaign strategy
- Create EDI communications calendar
- Spread awareness of EDI learning events

**3**

### STRUCTURED PERFORMANCE MANAGEMENT

Implement targeted approaches to help retain employees and progress all employees fairly

**Key Activities:**
- Assemble performance management and career progression subcommittee
- Enhance performance appraisal process
- Create targeted talent development programs
- Enhance talent mapping and succession planning
- Measure impact

Source: Council Report HUR19019 (b) Appendix B, from September 22, 2021.

## Summary of EDI Roadmap — Summary of EDI Cultural Behaviours

Following data collection and analysis from multiple sources – EDI diagnostic survey, Leader Interviews, Focus Groups, and a Senior Leadership Team Workshop – the following EDI cultural behaviours were recommended in the EDI Framework.

**4  LEADER COMMITMENT**

Improve Senior Leadership communication to better cascade priorities to various levels within the organization

**Key Activities:**
- Engage team with EDI content
- Define behavioural sprint, implement, reflect and engage, report back and iterate

**5  INCLUSIVE COLLABORATION**

Actively seek out opportunities to involve others and regularly seek feedback on how to team more inclusively

**Key Activities:**
- Encourage feedback
- Incorporate the use of inclusive language
- Break down silos
- Define behaviourial sprint, implement, reflect and engage, report back and iterate

**6  BETTER RECOGNIZE AND PROMOTE EMPLOYEES**

Lead with an open-mind to drive more employee recognition

**Key Activities:**
- Increase recognition
- Foster a work environment where varying opinions and ideas are welcome
- Define behavioural sprint, implement, reflect and engage, report back and iterate

Source: Council Report HUR19019 (b) Appendix B, from September 22, 2021.

57     At a high-level, the six initiatives recommended by EY as well as the EDI Framework (see Figure 4) are reasonable to move the City towards its objective to implement the EDI Framework, but they lack specific details on how to operationalize them. There is not much detail regarding what should specifically be done and to what end for each of the six initiatives. It is not clear what the short-term objectives are and how, specifically, will these objectives contribute to addressing equity, diversity, and inclusion at the City of Hamilton.

58     The EDI Framework sets up an administrative/HR support structure but the path to meaningful, systematic organizational change is much more difficult to achieve than fulfilling the six proposed initiatives. HR EDI needs to fill in the details. The somewhat rudimentary nature of the recommendations (e.g. "create business case") is also indicative that EDI as a concept was/is not mature at the City of Hamilton.

59     With the substantive use of consultants in EDI implementation work, the City should be more directive and/or have more scrutiny of the work of consultants. As it was noted above, one of the inputs for the EDI Framework was informed by a survey that was not representative of the City's staff, and EY provided high-level guidelines but little in the way of details that can be operationalized, the City of Hamilton should consider how to ensure consultants are providing us with recommendations that are actionable and whether they will have a lasting impact given the cost for engaging consultants.

# Project Management of EDI Framework Implementation

60     With respect to project management fundamentals, OAG found there is no fully developed Project Management Plan (PMP) for the implementation of the EDI Framework. OAG asked HR EDI staff for a PMP and was provided a Gantt chart, which is a project management tool that illustrates work completed over a period of time in relation to the time planned for the work. The chart provided included start and end dates of specific tasks, but it was very rudimentary (e.g. no dependencies-one task can only start once another is completed, no project milestones, no critical path, etc.). Per HR EDI staff, the PMP is a work in progress and still being developed. It is noted that the Senior Project Manager (SPM) EDI was hired in Q2 2022.

61     Typically, a Project Management Plan has 5 key items:

1. Project Charter (Business Objectives & Process Success Criteria)
2. Project Requirements
3. Work Breakdown Structure (defines scope in terms of deliverables)
4. Plan (includes risk, budget, resources, schedule, quality assessment, procurement, etc.)
5. Communications (identifying stakeholders and what information to share, who should get it, how to distribute, and when to share).

62     These five items are typically developed in sequential order.

Source: pmi.org

63    Though HR EDI is still in early stages of the EDI Framework implementation, work has been done on several of the initiatives without having a fully developed PMP. This is likely the reason for the lack of objectives and goals (short- and long-term) related to the EDI Framework implementation to date (see related Findings below).

## Status of EDI Road Map and Implementation to Date

64    The OAG reviewed and documented HR EDI's progress to date on the implementation of the six initiatives noted above to support the EDI Framework.

- A **Business Case** was written by EY for the City of Hamilton

- The **Communication Plan** for EDI framework is still in progress. However, there are not clear objectives and goals of what the Communication Plan will be achieving and what the communications should be about.

- **Structured Performance Management**: Some succession planning work has been proposed but this is still in development. Some draft documents were provided to the OAG and the succession planning objectives included: "consider diversity of candidates," and the end goal of succession planning was to "provide a continuous flow of diverse talented high potential employees ready to move into key positions." There was no information on how "diverse" is defined in this context or what may be considered adequately "diverse".

- **Leader Commitment**: Some short videos have been filmed by the Senior Leadership Team (SLT), but still need to be edited and finalized. The plan is for the videos to be included in new employee orientation sessions. SLT Performance Accountability and Development (PAD) goals include Harvard ManageMentor training completion rates and Employment Equity survey completion rates.

- **Inclusive Collaboration**: More EDI (IDEA) training modules are being developed. There is a proposal for a Leadership Allies group for IDEA work which would include training leaders on how to have impactful IDEA discussions with their staff.

- **Better Recognize and Promote Employees**: The HR Organizational Learning & Development Section has a proposal to create a framework to set minimum guidelines for employee recognition events. Based on the OAG's review of this work, it is not clear how this will further EDI work for this initiative.

65    Some of the six components of the framework should work in progression and/or piggy-back off each other. For example, the first step is a business case which should be the driver for EDI. The business case should help inform the Communication Plan objectives (why the City is doing this, why is it important, etc.), which should drive what data the City collects. Demonstrated ownership drives action plans (and possibly vice versa). Action plans should also drive the performance measures the City maintains. HR EDI seems to be putting efforts

towards each component separately and/or independently. As such, it is difficult to track the true progress of the Framework's implementation. This also contributes significantly to why the City does not have meaningful metrics linked to action plans at this time.

66    The work completed to date are steps towards embedding EDI in the organization. However, because of the lack of specific objectives and goals, there is not a systematic or methodical approach to this important work.

**Figure 4: EDI Framework**



Source: Report to Council HUR19019 (b) Appendix A, from September 22, 2021

# EDI Steering Committee

67      The EDI Steering Committee (SC) was formed prior to the creation of the current EDI Framework. The Steering Committee was approved by Council as proposed in the September 18, 2019 General Issues Committee-GIC report, (HUR19019) to be comprised of representatives from all departments and across all levels of the organization.

68      In our view, the EDI Steering Committee that was eventually formed is more of an Advisory Committee comprised of staff liaisons between the HR EDI team and their respective Departments/areas. Though they have done some of the work that was originally proposed, they do not function as a conventional steering committee. The first Steering Committee met in September 2020 and the members participated in the focus groups EY put together to inform the subsequent EDI Framework.

69      A steering committee is meant to be a governing body tasked with overseeing and supporting a project.

70      They provide guidance and support to achieve project objectives and goals throughout the term of the project. This is not the current function of the EDI Steering Committee.

71      A steering committee usually includes stakeholders and representatives from departments with a significant stake in the project's success. For example, in the case of the City, this would include:

- General Managers as well as heads of Divisions.

- Subject matter experts from Departmental areas already doing EDI work.

- Employees with substantial project management expertise.

This is not the current make up of the EDI Steering Committee.

72      The original Steering Committee was comprised of 18 members. General Managers (GMs) were asked to nominate individuals from their Departments to participate in the Steering Committee. The criteria for nominations were/are:

- Strong performance and high potential in their current role

- Succession planning candidates that would benefit from participation in an organizational project of this scope

- Viewed as influencers within their current teams/workgroups who can be early adopters of EDI

- Various and diverse perspectives and lived experiences to enhance the decision outcomes

73      Further, nominees had to possess the "Ability to devote the required time to participate in this initiative, which is anticipated to be approximately two hours of meeting time per month along with quarterly half day sessions for the next two to three years."

74    The original Committee members included staff from each of the five Departments (Corporate Services, Healthy and Safe Communities, Planning and Economic Development, Public Works, and the City Manager's Office).

75    At the time of OAG's fieldwork there were 15 EDI Steering Committee members (four Managers, one supervisor, and ten staff). OAG interviewed ten of the members. Of the members OAG interviewed, many seemed to have been appointed (based on their knowledge) as a professional development opportunity (later corroborated by GM interviews as well) and time availability criteria, but few mentioned lived experiences. Some members did volunteer/ask to participate because they were already doing EDI work in their area and had a passion for the work. Three of the four criteria above emphasize members who have been identified in their department as potential leaders rather than lived experiences or knowledge/work done in EDI.

76    In our consultations with HR, they felt that it was not necessary for the members to be knowledgeable about EDI because members of the Steering Committee would receive training. It was more important that the members be influencers/future leaders that could take the training they receive and help embed the knowledge in their respective Departments.

77    These EDI Steering Committee nominations were made before any unconscious bias training was provided to management and was during the early stages of the City's Employment Equity Data collection. The OAG also noted that the City does not collect demographic data on LGBTQ2SIA+ staff. Of the ten Steering Committee members interviewed, only one confirmed to OAG they identified as a visible minority.

78    In our opinion, the established criteria are not the most effective criteria for a committee to help implement and embed EDI. Criteria for the Committee should be based on what would help best achieve the objectives and goals of the Committee. Lived experience should have a greater emphasis and the criteria not just limited to staff member's demographic self-identification. A white male could have a spouse or children that come from the four groups and/or identify as LGBTQ2SIA+. There should be more inclusive and equitable criteria as well as documentation as to why someone was nominated. Having individuals with lived experiences involved in EDI implementation would help embed the cultural and behavior elements needed for success. There should also be a criterion for individuals already doing EDI work in service areas (e.g., Paramedics and Public Art have already embedded elements of EDI in the work they are currently doing.).

79    Further, the emphasis on succession planning and future leaders is a criterion that could be seen as a barrier as the City currently does not have (and did not have at that time) succession plan guidance on how to identify and/or recruit a more diverse pool of candidates for future leadership.

80    Regarding the work done to date by the current Steering Committee, a common issue mentioned during the SC interviews was that the committee seemed to languish for the first year or so. It took a long time to develop the Terms of Reference (TOR) to understand what their purpose as a Steering Committee member was. Even now some members still feel there is a lack of understanding of objectives and purpose amongst some of them.

81   This year, Steering Committee members were asked to create individual workplans for Education (training) and Communication to execute in their departments and/or areas. Some members mentioned it was not clear what about EDI they should be communicating. The OAG was provided with two SC workplans as examples to review and saw very disparate approaches to communications. Some of this was due to the two areas being different and having unique communication methods (e.g., televisions in common areas vs. email, etc.) but there was not a cohesive rollout of EDI communications, including messaging. There was no evidence of any guidance from HR EDI regarding inclusive language or accessibility considerations in their delivery. This is not surprising as the Communication Plan as part of the EDI Framework implementation has not been finalized.

82   One of the risks with this disparate approach to EDI communications is communication fatigue and communications are perceived as performative (emails about holidays and events) and not cohesive and substantial. By the time the City of Hamilton has more substantial communications, people may not take notice.

83   Also mentioned by some Steering Committee members was the feeling there is not full support by all levels of management within their Department and/or Division and they feel lost as to how to go about working within their Division to support EDI efforts. The Steering Committee members have been questioned as to the value and purpose of what they are doing for the time spent. This is likely a result of the overall lack of objectives and goals for the Committee as well as the function being more of a group of advisory liaisons for their respective areas without enough reach for other Divisions and their entire Department.

84   The current structure and strategy for the EDI Steering Committee is not conducive to creating substantial change to embed EDI in the organization.

# Data Collection and Performance Measurement

85   The Employment Equity Survey (EES) was launched in January 2020. Through the Employment Equity Survey (EES), staff (including new hires) and applicants are asked if they self-identify as a Woman, Aboriginal (Indigenous), Visible Minority/Racialized, or Person with a Disability. The data collected follows demographic data collection requirements per the Employment Equity Act for federal and federally regulated organizations. The requirement does not apply to the City (The City is not a federal or federally regulated organization). However, HR EDI started to use this requirement and follow the guidance as a basis to start collecting some Employment Equity data. Also, as noted below, the City's PeopleSoft system was already configured for this.

86   In reviewing the process, we found that the data collected is very basic and the survey response options are limited. For example, it does not offer individuals an option to self-identify as a member of the LGBTQ2SIA+ community. According to HR EDI, they are currently limited in what they can collect regarding demographics as there are system limitations as to what data can be stored in the PeopleSoft HR system. The collection of the four demographic groups was done because PeopleSoft was already set up for it. Any additional data collection

or storage would require additional modules or further customization in the existing system. Additional modules and customizations would require a funding source/budget.

87    The EES data was collected to inform the metrics that track if City of Hamilton staff and job applicants are reflective of the community they serve. To date, HR EDI staff has simply periodically reported the collected data with the data available from the 2016 Census on Hamilton Labour Market Availability (LMA) and the Canadian LMA to show progress towards being reflective of the community. The survey results have been reported to Council regularly, with the most recent report provided on November 30, 2022 as Appendix B with HR's report HUR19019 (c). The OAG has also included the 2021 Census Data for informational purposes below (Figure 5, "Demographic Category") and again later on in the report (Figure 6), as there have been changes between the 2016 and 2021 census data.

### Figure 5: Demographic Category

| Employment Equity Data | Self-Identifies as | | | |
|---|---|---|---|---|
| | Woman | Aboriginal/ Indigenous | Visible Minority/ Racialized | Person with a Disability |
| City of Hamilton Staff Survey (ACTIVE RESPONDENTS (2022) | 47.7% | 2.2% | 12.4% | 5.5% |
| City of Hamilton Applicant Pool (2022 YTD October 31, 2022) | 54.4% | 2.1% | 29.6% | 4.2% |
| City of Hamilton New Hires (2022 YTD October 31, 2022) | 81.7% | 2.0% | 27.4% | 5.6% |

| Statistics Canada Census Data | Self-Identifies as | | | |
|---|---|---|---|---|
| | Woman | Aboriginal/ Indigenous | Visible Minority/ Racialized | Person with a Disability |
| Hamilton Population (2016)** | 51.1% | 2.3% | 19.0% | 29.1%[+] |
| Hamilton LMA (2016)** | 48.3% | 2.0% | 17.6% | n/a |
| Canada LMA (2016)*** | 48.2% | 4.0% | 21.3% | 9.1%[+] |

** Based on total population, including children and others not seeking work.
***Refers to the number of people in the workforce from which employer can hire.
 +Disability data is from 2017 Canadian Survey on Disability

Source: Report to Council HUR19019 (c) Appendix B, from November 30, 2022.

| Demographic Category | Hamilton, 2021 | | Canada 2021 | |
|---|---|---|---|---|
| | Total Population | Population 15+ in Labour Force | Total Population | Population 15+ in Labour Force |
| Women | 50.8% | 48.0% | 50.6% | 47.9% |
| Indigenous | 2.2% | 2.1% | 5.0% | 4.2% |
| Visible Minority | 25.1% | 24.7% | 26.5% | 27.2% |
| Persons w/a Disability | 39.1% | 35.8% | 35.7% | 33.6% |

Source: Data is derived from custom tabulations of Statistic Canada's 2021 Census obtained by the City of Hamilton as a consortium member of the Canadian Community Economic Development Network (CCEDNet) Community Data Program.

88    Additionally, the legislative guidance for the Employment Equity Act recommends an 80% return and response rate (even if the response is "choose not to answer"). The City's overall response rate as of the end of fieldwork (June 2023) was around 61%. Also, the City of Hamilton has not reached the 80% response rate in all Departments. The Departments that have not yet met this are Healthy & Safe Communities and Public Works. These are the two largest Departments with a high percentage of staff that historically have not had a work email address. According to HR EDI staff, in addition to challenges relating to having staff without a work email address access and having the time to take the survey (either through an email link sent to a personal email address or paper surveys), another struggle is that some staff included in the overall headcount may be on leave and cannot be contacted to take the survey.

89    Because the City has not achieved the minimum 80% response and return rate in all Departments, the data is not used to inform any EDI actions or plans (e.g., regarding staff diversity).

90    There has been significant progress made in recent months, within Departments, to achieve the 80% response and return rate and that is due to the combined efforts of HR EDI staff and Department management.

91    HR EDI staff did provide some reports that they are in the early stages of developing and validating that would capture some additional information such as salary, promotions, and terminations, but even these reports are based on the four demographic groups data collected from the EES. So, the same issues would apply (no LGBTQ2SIA+ data and return and response rate).

92    In our view, utilizing EES data to gauge if the City is making progress towards having City staff being more reflective of the community falls short of what is needed. A more fulsome and nuanced approach is needed. There is other information that should be reviewed (such as exit demographic information, information from exit interviews-qualitative data, positions held, promotions, etc.).

93    This goal could be better-defined and have more specific, tailored objectives. For example, is the goal to be reflective of the community the City serves considered to be met if the percentages are reached but women, visible minority/racialized, Aboriginal (Indigenous), and persons with disabilities are in lower-level positions and not represented at leadership levels? This is a policy issue and would ultimately be a Council decision.

94    There are some departments that have met the 80% return and response rate. For these departments, the metrics collected via the EES are not yet used at the department level to consider changes (as needed) to address the diversity of their workforce. Currently, HR EDI has not analyzed the demographics in each Department against the Hamilton and Canadian LMA data and has not reported to Council on it. Work has yet to be done to develop plans linked to the use of the data provided. Demographic make-up goals should be department specific and linked to strategies and/or service needs.

95    Without rigorous and reliable data collection, the City will not be able to develop performance measures to inform the City's progress towards its goals. As part of the work relating to the

creation of the EDI Framework, EY provided HR with recommendations for an EDI Dashboard. Included were legally and culturally accepted demographic data collection questions and "Commonly Tracked EDI Metrics". This information should help guide improvements to the City's data collection and metrics tracking.

96     HR EDI's resource challenges regarding data collection are not only the PeopleSoft HR system limitations. Currently, HR EDI's core team is made up of a Senior Project Manager EDI and EDI Human Resources Business Partner (there is also a Training Coordinator position open as well), but another key resource would be a data analyst. The data and metrics component for EDI is very important and should be developed in conjunction with rolling out action plans or initiatives on what data can be collected and how it is collected can be considered. It will almost be impossible for data collection and analysis to be successful without data analyst capabilities being assigned to this work.

97     Because of the City's limited data collection, the organization does not have meaningful performance measures for the implementation of the EDI Framework. As noted above, the data the City collects is not linked to action plans. Because the EDI Framework is not fully implemented in the organization the City is far from establishing performance measures. The data and metrics the City currently collects and reviews does not inform anything about the City's EDI efforts or potential barriers to employment and/or promotions.

## Other Considerations for Internal EDI implementation

### EDI Resources

98     Another item that was part of Council's February 19, 2019 motion was to have the "Equity, Diversity & Inclusion toolkit (Handbook)" that was "developed to support existing work by staff, be reviewed, edited and revised as required following consultations with internal and external stakeholders and made available as a resource to City staff and the community." Although a handbook was developed, according to the HR Team, it will not be rolled out as a resource. According to HR, there were concerns with the EDI Handbook - it was produced by a consultant that a former Mayor's Office engaged, so HR EDI does not own the document and cannot make the required revisions to bring it into alignment with the Framework.

99     Currently, there is nothing to replace the "Handbook". Originally, and per the Council motion, the intention was to revise it to bring it in alignment with the EDI Framework. As part of EY's work to develop the EDI Framework and implementation they provided recommendations on how to do this. The revisions were not made, and the Handbook was never rolled out.

100    Per HR EDI staff, the newly launched (July 2023) IDEA Landing Page will be a resource for IDEA (Inclusion, Diversity, Equity, Accessibility) information for all employees. HR plans for the site to be updated regularly with new training, resources, tools, and communication as they become available. As of July 25, 2023, the resources and tools were limited (the few resources included Steering Committee page with a list of members, EDI Framework graphic, new IDEA logo, calendar of EDI events, etc.). Further, the IDEA Landing Page was launched before being

fully developed as a resource. Since it is a HOWI landing page (accessed by employee login only), it is not intended to be a community resource. The original Handbook was intended to be both a City staff and community resource. So, there is still no community resource. Also, as of the launch date, OAG did not see any announcement of the launch of the IDEA Landing Page for staff to be aware of it.

101    Though the page is still being developed and more updates are to come, there is a risk associated with an undeveloped resource. Staff may not see it as a useful resource and may not come back to it if it is perpetually in development.

# EDI in Recruiting

102    OAG observed that the City has done limited targeted recruiting. In the November 30, 2022 report to GIC, HUR19019 (c), HR outlined efforts undertaken to help increase the number of Persons with Disabilities as they identified this as an area where the City is still lagging per the EES data. Their efforts are significant and should be acknowledged. However, the City of Hamilton is also still below the LMA for Hamilton and Canada for Visible Minority/Racialized staff. HR has also done some targeted recruiting related to Indigenous/Aboriginal populations, but with the percentage of staff at 2.2% and Hamilton LMA at 2.0% and Canadian LMA at 2.3%, City staff demographics for this group is tracking closely to the community. The percentage of women on staff (47.7%) were tracking very close to the Hamilton and Canadian LMA of 48% as well. Refer to Figure 5 for full details.

103    In the above report, HR acknowledged that the City of Hamilton is still behind in Visible Minority/Racialized demographic by saying "While our current employee population of Visible Minority/Racialized staff are still below the Labour Market Availability, our applicant and new hire data indicates that we are attracting candidates and hiring above the levels indicated by the Labour Market Availability." However, the City is not currently reporting on the EES data of staff that are leaving the City so the new hire applicant data alone does not give the complete picture (and new hire data is also included in current staff data) of what progress is being made regarding Visible Minority/Racialized staff.

104    OAG obtained the 2021 Census data for the EES demographic groups from Children and Community Services staff (see Figure 5). OAG noted the biggest change in the Hamilton and Canada LMA has been in the Visible Minority/Racialized LMA. The Hamilton LMA increased from 17.6% (in 2016) to 24.7%. The Canadian LMA, increased from 21.3 % (in 2016) to 27.2%. The City is already behind for this group in staff representation.

105    The 9.1% Persons with a Disability for Canadian LMA as reported in the HUR19019 (c) Appendix B, from November 30, 2022 (see Figure 5) comes from the 2017 Canadian Survey on Disability (CSD) and is not from the 2016 Census data (as it was labeled in the report). The Statistics Canada Census data does collect Persons with a Disability LMA, but the criteria may be broader than the CSD. The CSD was conducted again in 2022 but this data has yet to be released. The numbers in OAG's Figure 6 are from the 2021 Statistics Canada Census data.

**Figure 6: Statistics Canada 2021 Census Data**

| Demographic Category | Hamilton, 2021 | | Canada 2021 | |
|---|---|---|---|---|
| | Total Population | Population 15+ in Labour Force | Total Population | Population 15+ in Labour Force |
| Women | 50.8% | 48.0% | 50.6% | 47.9% |
| Indigenous | 2.2% | 2.1% | 5.0% | 4.2% |
| Visible Minority | 25.1% | 24.7% | 26.5% | 27.2% |
| Persons w/a Disability | 39.1% | 35.8% | 35.7% | 33.6% |

Source: Data is derived from custom tabulations of Statistic Canada's 2021 Census obtained by the City of Hamilton as a consortium member of the Canadian Community Economic Development Network (CCEDNet) Community Data Program.

106    When HR last reported the data to GIC in November 2022 (see Figure 5) the 2021 Census data was not published and has only recently become available. HR plans to report to GIC with the 2021 Census data in Q4 of 2023.

107    HR management stated they do not undertake targeted recruitment for visible/racialized minorities. However, OAG believes there is room to take a more inclusive approach to recruiting.

108    For example, the OAG was provided with a spreadsheet by the HR Director Talent & Diversity of their "Diversity Recruitment Resources" which contained a list of various job posting sites. OAG looked at each of the resources listed with websites and found one City of Hamilton position on an Indigenous job board and it was for the Director of Indigenous Relations for the City of Hamilton. This was not targeted recruiting to increase Indigenous staff within the City overall, this was targeted recruiting to attract a pool of Indigenous candidates for the Indigenous Relations position. This is understandable, but in contrast, right above it, McMaster University had a posting for a position for their Associate Vice President and Chief Financial Officer.

109    OAG also checked the PinkJobs.com website listed in their file. The website is a free diversity and inclusion focused job board that serves North America (including Canada), Australia, and Europe. Pink Jobs is headquartered in Manchester, United Kingdom, but employers in Canada can list unlimited job postings for both full-time and part-time roles on Pink Jobs and view candidate resumes." Pink Jobs was originally created over 10 years ago to list LGBT friendly roles and has grown to focus all aspects of diversity and inclusion. There did not appear to be any City of Hamilton jobs on the website. OAG noted that the Region of Peel and the City of Toronto had posted several jobs.

110    Though there is a cost associated with some of these sites, several listed were free. HR Talent & Diversity should take a more inclusive approach to recruiting if the City's stated goal is to have City staff be more reflective of the community it serves. In addition to helping with recruiting a diverse staff, it also sends a message to job seekers that the City of Hamilton is an inclusive employer.

## EDI in Corporate Policies

111    OAG found that HR EDI have yet to meet with the Corporate Policy Review Group (PRG) to discuss how the group can incorporate the EDI Framework into their policy review process. This is a part of the HR Strategic Plan. Per one of the co-chairs of the PRG, the HR EDI team have not been able to attend their meetings and they are scheduled to meet in the Fall of 2023. After fieldwork on this audit was completed, OAG confirmed that in late September 2023, HR EDI met with the PRG and presented "Embedding IDEA into Policy Guide" and requested feedback.

## EDI Champions

112    In general, the OAG finds that the City has a top-down approach for EDI implementation and communications. SLT and management have been the initial focus for training with the Harvard ManageMentor. In their September 18, 2019 GIC report on the EDI Framework (HUR19019), HR recommended that the City Manager "be identified as the Diversity and Inclusion Champion for the City of Hamilton." As noted above, videos of SLT speaking about EDI have been recorded with the intention they will be included in new employee training.

113    In the 2021 Our People Survey, one of the Bottom 5 drivers for staff were the availability/accessibility of Senior Leadership and Two-Way Communication. From the OAG's interviews with GMs and the City Manager, they all seem genuinely supportive of EDI work. However, if staff see SLT as inaccessible and two-way communication is lacking between themselves and supervisors, the top-down approach may seem superficial or they may not feel they are being heard. If most of the diversity of the City's workforce is at the staff level, this approach by itself, may not work.

114    As noted in the Community and Service Delivery EDI work below, despite a lack of a governance structure and overall strategy, there is a lot of good work on EDI being done thanks to the dedicated and knowledgeable staff at the City. Many staff have education, training, and work experience working with equity, diversity, and inclusion challenges. They should be the champions. The SLT and City Manager should champion the work of these particular individuals in their newsletters and videos in addition to speaking broadly about their own commitment to EDI. This sets up a two-way communication flow regarding EDI efforts and commitment in the City.

## Use of the Term "EDI lens"

115    The term "lens" is still being used in EDI discussions despite EY's recommendation (and HR EDI's agreement) to not use it. It is not clear that this information and the reason was shared with City staff. This was included as a recommendation for revisions to the Handbook that were part of EY's work related to the development of the EDI Framework. Since the Handbook was never revised, there has been no direction on alternative ways to express this.

# Community EDI

116    The Office of Government and Community Relations (OGCR) was leading the City's public engagement efforts at the time of the audit. In a broad sense, public engagement should include leading and supporting citizen advisory committees, working with community partners and engaging the public in resolving prominent issues and seeking feedback in the way the City operates, etc. Among many benefits of public engagement are: enhanced understanding of public interests, concerns and priorities, and public engagement helps build resident's trust and confidence in City government.

117    Community relations work supporting and overseeing community groups and volunteer advisory committees is an important component of EDI efforts at the City. The OAG did not locate a framework or a clearly documented objective of what is to be achieved in working with community groups and volunteer advisory committees. We noted work with these groups tends to be issue driven. Further, each community group and volunteer advisory committee has its own agenda and mandate. Per the OGCR, there are 21 citizen advisory committees at the City, five are supported and overseen by the Office of Government and Community Relations. Other groups are either supported by the Community Strategies (formerly Community Initiatives) team in Healthy and Safe Communities or other departments across the Corporation. As the activities of many of the volunteer advisory committees in the City will be undergoing a review, we feel the review should consider finding a common objective or goal, as well as an executable strategy to lead the volunteer advisory committees, and a consistent methodology to monitor the progress of their work. This approach would reduce the amount of work imposed on the team who leads and supports these groups and enable reportable results.

118    Regular communication with public is one way to keep public informed of what is going on. From a public trust point of view, the OAG finds that the City could have done better in communicating with the public for some of the commitments that were made. On February 27, 2019, Council approved a motion that included seven actions the City was to take to address EDI. The motion was made public in a Media Release the next day. However, we confirmed some of the seven actions did not happen (e.g., an EDI Summit). In addition, terms such as "Mayor's Roundtable on Diversity and Inclusion" and "Diversity Advisory Committee" appeared in a Council report, which is public information. Staff confirmed that the Mayor's Roundtable and Diversity Advisory Committee either was never formed or was deferred. We were unable to locate any information with regards to if there was an explanation or discussion with the public on the commitment not being fulfilled.

119    Upkeeping the commitments that the City made and being transparent in everything the City does is key to maintain the trust and confidence of residents. When a commitment made cannot be achieved, it is a good strategy to provide an explanation to the public on why the commitment was not kept.

120    Sage Solutions consultants previously made 18 recommendations on anti-hate and discrimination mitigation strategies. The majority of these recommendations are very high-level and will require a collaborative approach across the organization and with community stakeholders. The OGCR team alone is simply not able to address all of them. From the OAG's

point of view, no single Division can effectively mitigate hate and discrimination without actions across the organization. Examples of these recommendations are:

- Accelerate decisive and well-informed City responses to stand against hate.

- Incorporate more diverse representation at decision-making table.

- Invest in more safe community spaces.

121    The OGCR developed an action plan in December 2021 that outlined seven actions to be taken in two phases. As four of the seven actions are recurring in nature, even though the actions to date can be considered completed, these efforts should continue. Examples of such ongoing efforts include engaging with stakeholders and advocating to higher levels of government. Due to lack of oversight authority, the team can only address those recommendations within their control.

122    For the value of the consulting work to be fully achieved, and for the hate mitigation and anti-racism strategy to be effective, collaborative actions are required from other City Divisions and community partners. When the recommendations are not acted upon, the money spent on hiring a consultant has not achieved its intended value.

123    We noted some of the work under this Office are similar in nature to those in other areas, for example the Urban Indigenous Strategy (UIS) implementation under Indigenous Relations Section and the Community Safety and Well-being Plan implementation with the Community Strategies Section. OAG believes it is important to review and streamline the work in these areas to avoid redundancy, and to create synergies and maximize the amount of progress that can be achieved with existing resources.

124    The Outstanding Business List (OBL) is maintained by the Office of the City Clerk to ensure Council directions are recorded as formal Council business, and when Council directions have been fulfilled, ensure they are reported back to Council. The current process is that only items specifically requiring a report back to Council are placed on the OBL. While the 2019 Council-approved motion (Council Minutes 19-004, Item 7(b)) on EDI implementation contained seven actions, only two of the actions (steps to implement EDI and EDI framework) were required to report back to Council. The remaining actions were not required to report back (per the approved motion), therefore never made it on to the OBL. As a result, there was no regular Council or staff line of sight on these other action items.

125    These six actions were:

- **Housing** - That implementation of the equity, diversity and inclusion lens begin in the City's Housing & Homelessness Strategy and service delivery;

- **EDI Toolkit** - That the attached draft Equity, Diversity & Inclusion toolkit, developed to support existing work by staff, be reviewed, edited, and revised as required following consultations with internal and external stakeholders and made available as a resource to City staff and the community;

- **EDI Summit** - That the City Manager, in partnership with the various Volunteer Advisory Committees representing equity seeking groups, be directed to plan and execute an Equity, Diversity and Inclusion Summit through which members of Council and the public can hear directly from subject matter experts and the community on equity practices and how an equity, diversity and inclusion lens could be integrated and incorporated into public policy and service delivery;

- **EDI Summit Budget** - That the costs associated with the Hamilton Equity, Diversity and Inclusion Summit be funded from the Mayor's Office, up to a maximum of $5,000;

- **Participating upper-level government EDI initiatives** - That as part of ongoing efforts to develop and advance the equity, diversity and inclusion analysis, staff participate in relevant, Provincial and Federal equity, diversity and inclusion related initiatives; and

- **Audit of EDI** - That the City's Internal Audit services conduct an Equity, Diversity and Inclusion (EDI) Audit, city-system wide, to establish the baseline as it relates to City policy, program development, hiring and staff development practices, service delivery, budgeting, business planning and prioritization by which to measure progress annually.

126   The OAG notes that an EDI Audit was included on the 2019-2022 Term of Council Audit Work Plan (AUD19007) that was approved by Council in September 2019, subsequent to the motion.

127   Overall, the lack of tracking of these items could expose the City to significant reputational risk regarding items that were ultimately not tracked and actioned. It could also call into question how serious the City is with regards to implementing EDI.

# EDI Implementation in Service Delivery

128   OAG concluded EDI has not been fully embedded in service delivery business processes at the City of Hamilton, nor has there been an adequate project management plan or governance structure in place to enable consistent implementation across the organization. However, that does not mean that there are not EDI efforts underway at the City of Hamilton. Currently, in some service areas accessibility and inclusion concepts and principles are being applied during service planning and delivery. Primarily these efforts are to meet various compliance requirements for that particular service area or due to Council direction. Examples we noted are accessibility in transit services and inclusion programming in recreation centres owned and operated by the City.

129   We found that the City's current EDI work tends to be reactive to legislation requirements. Accessibility, one element of EDI or IDEA, has been implemented in all areas Accessibility for Ontarians with Disabilities Act (AODA) governs. City buses and bus-stops, parks and recreation centers and city facilities have been made accessible. Under Council direction, an inclusion program was developed and implemented in City owned recreation centers to support people with disabilities. The City as a whole strives to be in full compliance with AODA by 2025.

130   The audit did not review every service or program provided by the City. The ones that were selected for review were primarily outward facing services provided to general public by

departments/boards: CityHousing Hamilton, Healthy and Safe Communities, Planning and Economic Development and Public Works. There were some limitations of information available due to many staff changes and regular webpage renewal and updating.

131   The methodology utilized in reviewing EDI in service delivery included interviews with frontline staff of the selected areas, research of department / division websites regarding services and programs, and review of policies and procedures for delivering services. To ensure consistency, we developed a standard set of questions, and adapted them as needed. We also interviewed four General Managers of these departments to gain an understanding of how senior management is directing EDI implementation in their own areas.

## Current State

132   For the services selected for review by the OAG in this audit, and based on the available information, we were unable to locate a framework, nor a high-level plan or overall strategy that provides corporate standards for the implementation of EDI at the individual service delivery level. This situation ties back to the need for an governance structure to provide directions, strategies and oversee the implementation.

133   No business area has a budget set aside for EDI implementation. Interviews with senior management of Corporate Services confirmed our view that the City's current budgeting processes does not have specific considerations for equity.

134   Based on the interviews with over 40 staff members from all departments, and our research of their services, EDI has not been formally embedded in business processes. However, as a starting point, some areas have recruited an EDI specialist such as Children Services, but actual EDI work is yet to be developed, while in other areas EDI work is less advanced. Other areas have included EDI in their action plans such as the 2021-2025 Economic Development Action Plan.

135   Most staff we interviewed were passionate about EDI and expressed a strong desire to do more, but they were unclear where to start and what to do. A strong message we received is there is a need for Corporate direction, standards, and guidelines. This need is not only because there is a shortage of experience and skill in implementing EDI, but also because consistency in service delivery across the organization is almost impossible without an established governance structure.

136   Below is a summary of the OAG's findings of EDI efforts in each City Department. A sample of programs and services were selected for review to determine whether EDI has been or is planned to be embedded in each Department.

# Planning and Economic Development Department (PED)

137   Divisions with the following services were selected for review.  Sustainable Community Planning, Commercial and Small Businesses, Business Development and Immigration Partnership, Heritage Resources, Cultural Development, Placemaking and Public Art.

138   We found that being in compliance with AODA requirements is one of the key considerations in planning for services in the Planning and Economic Development Department. Some informal EDI considerations were applied in public consultation meetings held by the Department; however, there were no policies or procedures that speak to embedding EDI in the service planning and delivery process.

139   The Economic Development Action Plan 2021-2025 is the guiding document for the City's Economic Development Division, as well as for Hamilton business communities. The Plan recognizes the importance of EDI in Hamilton's economic growth and the contribution of immigrants to the local labour force and have included two actions to address EDI in the Action Plan.

140   The Placemaking Grant Pilot Program started in 2021, and through 2023 aimed to enliven public spaces in Hamilton. The Program awarded 13 projects in 2021, of which 3 projects were either led by community groups or designed with inclusivity being considered. The Art Sector Review Panel and Final Jury for Hamilton Arts Awards included people from EDI backgrounds. PED staff did note there is a shortage of EDI knowledge and experience in PED staff. To support Indigenous heritage, Civic Museums have co-funded a contract employee, an Indigenous Specialist, with the Indigenous Relations Section in the Healthy and Safe Communities Department.

# Public Works Department

141   Two divisions were selected for review: Transit, and Parks, Open Spaces and Cemeteries.

The priority has been to ensure City properties and facilities such as parks, buses and bus stops are in full compliance with AODA accessibility requirements.

142   In addition to the existing DARTS service, EDI is newly built into the six principles that will guide the work of Transit however neither a strategy nor action plans are fully developed to embed EDI into Transit service delivery.

143   The six principles of the Transit Division are: 1. Customer experience is at the heart of what we do; 2. We honor equity, diversity and inclusion; 3. We deliver on our promises; 4. We connect, innovate and go forward; 5. We engage with our employees to improve customer experience; 6. We make a positive impact on communities, environment and economy. Management has played a strong role in advocating and embracing diversity and reducing hate and discrimination incidents on City of Hamilton Transit.

144    Other items noted by Public Works included: training of staff who work on different shifts and different locations within a 7-day operation has been challenging. For parks and open spaces, with the existing budget, staff tried to apply EDI on items such as arm rests on benches to help getting up; wheelchair accessible swings and picnic tables; rubber surfaces for play structures; wayfinding signage on trails, focusing on pictographs, etc. in a limited number of parks and open spaces. For Cemeteries, burial supports for special income and a variety of interment options are offered. There is no budget for items such as universal washrooms on City properties to accommodate the diverse needs of the community.

# Healthy and Safe Communities Department

145    The following services in Healthy and Safe Communities Department were selected for review: Indigenous Relations, Community Initiatives (now Community Strategy), Health Equity (Public Health Services), Children Services/Early Years, and Housing Services as well as Recreation.

146    The implementation of the Community Safety and Well Being Plan (CSWBP) and the Urban Indigenous Strategy (UIS) resides with two teams in the Healthy and Safe Communities Department: Community Strategy, Indigenous Relations. It appears there was some overlapping work with that of the Office of Government and Community relations. There is a need to review the location of the work within the organization and streamline the work as part of reviewing governance of EDI in the organization.

147    Both CSWBP and UIS are corporate initiatives requiring collaboration across the organization. The two teams do not appear to have the oversight authority needed to fully and successfully implement these initiatives.

148    In Recreation, an Inclusion Program is in place to accommodate persons with disabilities in City operated/owned recreation centres to comply with AODA requirements as well as Council direction. Fee subsidy is available for low-income families to access the City's recreation facilities. Universal changerooms and recreation program brochures in languages other than English are available.

149    Public Health Services' Health Equity Plan was in the development stage at the time of our fieldwork. The plan is required under Health Equity Guidelines, 2018. Barriers were identified in current recruitment processes in attracting racialized and Indigenous applicants to Public Health Services.

150    An Equity Specialist has been recruited and will be a shared resource in the Children and Community Services Division for equitable service delivery. However, strategy and action plans are yet to be developed. The OAG was told that inclusive measures supporting families and children with special needs are in compliance with *Child Care and Early Years Act, 2014*.

151    The Housing and Homeless Action Plan (HHAP) was developed in 2013 and reviewed and revised in both 2019 and 2020. The 2020 version of the Action Plan stated "*The HHAP will always be implemented through a person-centred approach to equity that acknowledges the unique needs of each individual...*" Housing Services is currently in the process of developing

an EDI framework for the housing system, which will require corporate guidelines and support to ensure consistency with Corporate EDI Framework.

# CityHousing Hamilton

152     The mission of CityHousing Hamilton is to "*provide affordable housing that is safe, well maintained, cost effective and that supports the diverse needs of our many communities*."

153     The 2023-2027 Strategic Plan of CityHousing Hamilton included two action plans to implement EDI, of which the first one is to recruit an Equity Specialist. Per the Strategic Plan, CityHousing is to first undertake a tenant need assessment and perform analysis which would serve as the starting point of EDI strategy. The Equity Specialist is yet to be recruited to develop the strategy and lead the work of EDI implementation.

# Overall Analysis of EDI at the City of Hamilton

154     Implementing a City-wide EDI plan requires a solid foundation consisting of a governance structure, communications, planning, clear objectives, strategies, and metrics. The leadership and staff OAG spoke with are committed to embedding EDI in the organization, in the work they do, and in the services they provide to the community. However, the City of Hamilton needs a more robust foundation in the form of such elements as governance structure, project plans, risk management tools, performance measures and benchmarks, defined objectives, and detailed strategies.

155     We have noted a lack of governance in several sections of this report, in particular, there is not an overall strategy or oversight body for implementing Community EDI and embedding it in all service delivery. The current EDI Framework being implemented by HR EDI only addresses EDI within the organization, primarily as an employer. Much of the service delivery related EDI work to date has been driven by or has been implemented in reaction to legislation (e.g. AODA requirements). There is no systematic framework for implementing EDI principles across the entire organization in service delivery. To do so, resources and a high degree of collaboration across the organization would need to occur.

156     In addition, what staff have implemented or applied with respect to EDI in delivering services to residents and business (where it exists) is fragmented. Each area is doing what they believe is right. However, there is no leveraging of synergies or communication amongst them to standardize EDI language, utilize common approaches, achieve efficiencies, and avoid duplication of efforts and/or costs. Corporate support is needed for EDI development and implementation in both Community EDI work and in City service delivery to ensure they are consistent with a Corporate framework and expectations. The City as a whole, in all areas, should be sending a consistent message and have a consistent approach.

157     In our view, EDI implementation in all three areas will require more than a framework to be effectively embedded in the organization. "HR Diversity initiatives should address three levels of organizational change: structural, cultural, and behavioral."[1]. Governance structures, frameworks, succession plans, etc. are the structural elements but culture and behavioral

change is also required. For example, equitable hiring practices, performance evaluations, and advancement policies and plans may remove barriers to the participation of women, Visible Minorities/Racialized people, Indigenous/Aboriginal people, and Persons with Disabilities but if the City's culture does not support their hiring and advancement, EDI principles will not be achieved or embedded in the organization. To this end, the training being rolled out by HR EDI is helpful but in and of itself will not change the culture.  In our opinion, much more than a top-down approach is needed.

[1] Holvino, Ferdman, Merrill-Sands, Creating and sustaining Diversity and Inclusion in Organization: Strategies and approaches.

158    In addition, when consultants are relied upon to provide advice and make recommendations, the City should more rigorously review the consultant's deliverables and their recommendations. Consultant recommendations should be suited specifically for the City of Hamilton's needs and be actionable (e.g. sufficiently detailed on how to operationalize and/or identify who will be responsible) instead of being generic to municipalities or organizations in general.

159    Keeping commitments made to the public is also important to enable and maintain public confidence in the City. Unrealistic assessment of resources (people, systems, time commitments, etc.) and efforts regarding what may be needed to embed EDI in the organization may lead to unrealistic commitments being made, which may result in the City and/or Council not being able to keep its commitments. When this happens, communication with public on what is going on is required to demonstrate the City's seriousness about its commitment to Equity, Diversity, and Inclusion. Without this fundamental piece, the successful implementation of EDI in the organization is at risk.

160    As part of EY's report to the City regarding the EDI Framework, they performed an assessment of the current state of EDI within the City. Using a maturity model that shows increasing levels of proficiency with regard to the extent to which EDI is embedded within an organization, the City was in the early stages of EDI maturity (Figure 7).

**Figure 7: Summary of Results – EDI Maturity Model**

## Summary of Results – EDI Maturity Model

| | LEVEL 1 | LEVEL 2 | LEVEL 3 | LEVEL 4 | LEVEL 5 |
|---|---|---|---|---|---|
| | We are compliant | We are all the same | We encourage everyone to be themselves | EDI is part of everything we do | EDI is who we are, not what we do |
| **What issues are you tackling?** | People can be judgemental about cultural differences<br><br>Our workforce is disillusioned<br><br>Don't have the right EDI data | We have one size fits all approach<br><br>We struggle to identify the gaps and set targets<br><br>We don't know how to start the conversation<br><br>We don't have leadership commitment | We know where the barriers to progression are<br><br>We tend to focus on traditional interventions that don't tackle the barriers systemically<br><br>We have a strategy but it isn't followed through | We're very focused on EDI but it is not yet a part of our everyday culture<br><br>We have clear accountability, but not everyone contributes<br><br>Struggle to manage this against other strategic priorities | We can articulate the ROI of our investment and we want to do more to evidence non financial value to a broad set of stakeholder<br><br>We want to use our progress to influence others and change the world |
| **What is the business doing?** | • Focus policy only on regulatory requirements | • Collect limited diversity data (gender, age and ethnicity) but don't proactively analyse | • Strategy in place with leadership commitment, but limited follow through<br>• Interventions in place but not always targeted or prioritized<br>• Bias awareness<br>• Limited metrics & tracking<br>• Networks and groups drive change | • Leadership are accountable<br>• Can demonstrate progress against objectives<br>• Collect diversity and EX data that shapes the approach<br>• Business case for diversity is part of strategic and operational activities | • Cultural evolution is core to business strategy<br>• Progress and evolution is evaluated and lessons learned are fed back into every part of the business<br>• All employees are empowered to influence<br>• Dedicated budget and clear ROI |
| **What is the impact?** | • High attrition, absenteeism<br>• Employees are cynical mistrustful of leadership | • 'Don't ask, don't tell' culture stifles team spirit and creativity<br>• Employees disengaged | • Positive impact on productivity<br>• Employees feel valued and teams perform well | • Better engagement scores<br>• Senior management is more diverse<br>• Employees seek mentors and take responsibility for career development | • Higher profit margins<br>• Employees are passionate brand ambassadors<br>• Influencing broad set stakeholders and re-shaping corporate expectations<br>• Voice in the market |
| **Where are you now and where do you want to get to?** | | CURRENT STATE | | | |

Source: Report to Council HUR19019 (b) Appendix F, from September 22, 2021.

161    Based on OAG's review, the City has made some progress in individual elements but still lies somewhere between Levels 2 and 3. "EDI is part of everything we do" is the descriptor for Level 4. Even though it has been almost two years since the EDI Framework was approved by Council, resources were not hired until 2022, and more substantive progress will take time.

162    Related to this, we note that the new 2023-2026 Term of Council Priorities do not include EDI as a stand-alone priority. OAG reached out to Corporate Initiatives staff in the City Manager's Office regarding this observation:

> *"The discussion and individual feedback noted that it was more of a lens that should always be applied to how the City approaches our work and deliver City services, rather than an individual priority."*

It is the OAG's opinion that the City of Hamilton, in its current state, is not yet mature enough to reliably achieve this based (as noted above, see Figure 7). The City is at risk of not successfully implementing EDI throughout the organization.

163    We note that the Report on Council Priorities states that "All of these priorities will be applied with an equity and accessibility lens, ensuring this maximum benefit for the people of Hamilton". A realistic appraisal of the current situation is needed, including the resources required to successfully embed EDI in City service delivery.

164    In 2017-2018, the City's Diversity staff participated in the Regional Roundtable on Diversity forum facilitated by external consultants. An internal environmental scan was performed on the EDI conditions in the City. An environmental scan is the process of gathering information about factors that may impact an organization's internal and external environments. The basic purpose of environmental scanning is to help management understand their current state and determine the future direction of the organization.

165    The details of the assessment were reported to the GIC on September 18, 2023 (HUR19019 Appendix C, City of Hamilton Internal Environmental Scan). The assessment was done on eight domains –

- Planning & Policy
- Organizational Culture
- Education & Training
- Human Resources
- Community Capacity Building
- Service Planning & Development
- Client Engagement
- Service Provision

166    Based on the scan the three domains where the organization was the strongest with regards to equity, diversity, and inclusion were Education & Training, Community Capacity Building, and Planning & Policy. The three domains where the organization required improvement were Client Engagement, Service Planning and Development, and Human Resources. The results of the scan led to the implementation of the collection of the EES data, diversity competencies in management's PAD process, and community engagement at Festival and Events. This same assessment or similar assessment could be done annually and kept as an annual benchmark for the City.

167     From an external point of view, environmental scan comparators could include benchmarking against other municipalities (Ottawa and Toronto are among the 2023 top 100 of "Canada's Best Diversity Employers."), reviewing regulatory changes impacting IDEA, and understanding shifts in the City's population prior to Census data every five years. The results of these scans could be reported to Council every two years.

168     When reporting to Council, HR EDI should present a road map of then to now and report on how exactly efforts and implemented action plans address equity, diversity, and inclusion (and accessibility) and their outcomes. EES data could be presented again until the 80% response and return rate has been met and at that time, a detailed action plan associated with what it will be used for should be presented.

169     Though there are many examples of good efforts towards EDI implementation throughout the organization in all areas reviewed by OAG, they tend to lack clear objectives and purpose, are disparate, and often siloed. It is our view that the City needs a sound strategy and project plan in place to implement EDI across the organization including: as an employer, in community and public engagement efforts, and in the delivery of city services to residents and businesses. However, there have been numerous good efforts made by staff across the organization that forms the foundation for further EDI work, which will be strengthened with the provision of clear corporate direction, including the development of objectives and executable strategies, and the provision of effective tools and resources.

170     The OAG found a number of indicators that the existing team lacks the capacity to implement the EDI Framework and bring it to a more robust maturity level. To address this, we recommend that they formally assess their resources and needs for the future.

171     In an initiative of this size and scope, the challenges for change management are significant. To create the cultural and behavioural change to make EDI the norm for what the City does, the organization may need to step back and reorganize to make it happen. A large part of the cultural and behavioural change is organizational commitment, including management buy-in. Though the GMs have shown their support by participation in the ELA and in filming EDI videos, more ingrained efforts beyond this in each Department need to be part of the day-to-day work and strategic objectives. As previously stated, there were indications through the course of the audit that the City's current capacity for implementation has, and may, be insufficient to address the gaps identified in this report at a level of maturity and comprehensiveness that is desired by management and within reasonable timelines.

## Recommendations

172   Please refer to Appendix "B" to Report AUD23013 for a list of Recommendations and the related Management Responses that will address the key audit findings, with a focus on EDI implementation from project management and governance perspective, data collection and metrics, and related process improvements.

## Conclusion

173   The OAG has brought forward 33 recommendations to strengthen EDI processes at the City of Hamilton.

174   The OAG would like to thank the Human Resources Talent & Diversity team, and, the members of the EDI Steering Committee, the Office of Government and Community Relations team, as well as staff across the organization who we interviewed and provided information for their help throughout this audit. We look forward to following up with management in the future to see the progress of their action plans and their impact on improving EDI at the City of Hamilton.

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