



P029, Employment Equity Policy Review: Phase 1

To: Governance and Policy Committee

Date: 29 May, 2019

Report No.: 05-19-3664

Strategic Directions

- Transform Student Learning
- Create a Culture for Student and Staff Well-Being
- Provide Equity of Access to Learning Opportunities for All Students
- Allocate Human and Financial Resources Strategically to Support Student Needs
- Build Strong Relationships and Partnerships Within School Communities to Support Student Learning and Well-Being

Recommendation

It is recommended that the Work Plan for review of the Employment Equity Policy (P029), as presented in this report, be approved.

Context

The Employment Equity Policy (P029) (the “Policy”) (see Appendix A) was adopted on June 23, 2004 and most recently revised in March 2012. The Policy is being reviewed in accordance with the Policy Review Schedule and the policy review process approved by the Board of Trustees on February 6, 2019. The proposed content changes as outlined in the Policy Review Work Plan (see Appendix B) reflect the TDSB’s commitment to equity, as laid out in the TDSB’s Equity Policy (P037) and the Integrated Equity Framework which was adopted in 2016.

As part of the Policy Review Work Plan, staff completed a jurisdictional scan of similar policies from other school boards (see Appendix C).

The Policy Review Work Plan is presented for the Committee’s consideration and approval.

Action Plan and Associated Timeline

Subject to the Governance and Policy Committee and Board directions, staff will implement the review of the Policy in accordance with the Policy Review Work Plan. Extensive public consultations with stakeholders, including all Community Advisory Committees, are contemplated as part of the review. The revised draft Policy is expected to be presented to the Governance and Policy Committee for consideration in June 2020.

Resource Implications

No additional resources will be required for the review of this Policy.

Communications Considerations

The Policy will be communicated in accordance with the Policy Review Work Plan.

Board Policy and Procedure Reference(s)

- Employment Equity (P037)

Appendices

- Appendix A: Employment Equity Policy (P029) - current
- Appendix B: Policy Review Work Plan
- Appendix C: Scan of Selected School Boards

From

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Toronto District School Board

Policy P029

Title: **EMPLOYMENT EQUITY**

Adopted: June 23, 2004

Revised:

Reviewed: Spring 2006, March 2012

1.0 OBJECTIVE

To establish the Board's commitment to the development, implementation and maintenance of employment and promotion policies, practices and procedures that result in and sustain a workforce that, at all levels, reflects, understands and responds to a diverse population

2.0 RESPONSIBILITY

Chief Employee Services Officer

3.0 DEFINITIONS

Affirmative action means the development and implementation of positive measures with regard to all aspects of the employment of members of designated groups.

Designated groups Historically, *designated groups* refers to racial minorities, aboriginal peoples, women and persons with disabilities. For the purpose of this policy, persons who have experienced discrimination because of sexual orientation and socio-economic status are also included, as per the Board's Equity Foundation policy.

Employment equity A program designated to remove systemic barriers to equality of outcomes in all aspects of employment and which leads to equitable representation of designated groups at all levels of employment.

Equality The achievement of equal status in society in terms of access to opportunities, support, rewards and economic and social power for all without regard to age, gender, race, class, culture, faith, citizenship, disability, ethnic origin, family status, sexual orientation, gender identity, marital status or same sex partner.

Equity The provision of opportunities for equality for all by responding to the needs of individuals. Equity of treatment is not the same as equal treatment because it includes acknowledging historical and present systemic discrimination against identified groups and removing barriers, eliminating discrimination and remedying the impact of past discrimination.

4.0 POLICY

- 4.1. There shall be an ongoing commitment to the development and communication of the principles of Employment Equity throughout the Board (i.e. students, staff and community).
- 4.2. Equitable hiring, employment and promotion practices shall be applied.
- 4.3. Systemic barriers to equitable recruitment, selection, hiring, training and development, career counselling, transfer processes, performance assessment and promotion shall be identified and eliminated.
- 4.4. Outreach activities and affirmative action strategies (e.g., encouragement, mentoring, training and staff development) shall focus on designated groups in order to ensure that all levels of occupational groups within the Board achieve equitable representation.
- 4.5. Designated groups shall be the focus of employment and promotion strategies, but not to the exclusion of other groups.

5.0 SPECIFIC DIRECTIVES

The Director is authorized to issue operational procedures to implement this policy.

6.0 REFERENCE DOCUMENTS

Board Policy P.037: Equity Foundation

Commitments to Equity Policy Implementation

POLICY REVIEW WORK PLAN

Date: [May 29, 2019](#)

All policies will be reviewed to ensure consistency with the TDSB's Mission, Values and Goals Policy (P002), the Equity Policy (P037) and the Board's Multi-Year Strategic Plan.

POLICY INFORMATIONPolicy Title and Policy Number: **Employment Equity (P029)**Review during fiscal year: [2019/2020](#)Last reviewed: [March 2012](#)Director's Council member responsible for this Policy review: [Executive Superintendent, Human Rights and Indigenous Education](#)**Phase I. PLANNING AND OBTAINING TRUSTEES' DIRECTIONS**

This Policy Review Plan has been discussed with the Policy Coordinator:

 Yes NoThis Policy Review Plan will be discussed at the Governance and Policy Committee meeting held on: [May 29, 2019](#)**Phase II. REVISIONS****Formatting Changes**

The Policy will be reformatted to ensure alignment with the current Policy Template (Operational Procedure PR501, Policy Development and Management):

 Yes No**Content Changes**

The Policy requires content revisions:

 Yes No

The content changes are due to the following reason(s):

-
- Legislation
 - Government directives/policies
 - Board decisions
 - Multi-Year Strategic Plan requirements
 - Operational requirements
 - Simplify and/or update using plain language
 - Alignment with Equity Policy

Detailed information on the proposed content changes, including findings of the policy equity assessment:

- Provisions to ensure alignment with the TDSB’s Equity Policy and integration of employment equity commitments as indicated in the Integrated Equity Framework
- Coordination, collection and application of data for the development, implementation and maintenance of employment and promotion protocols and practices, including at the point of application, point of hire, point of promotion, etc.
- Ensuring individual demographic data is used confidently, consistently and given meaningful weight for application, employment and promotions.
- Conduct a demographic workforce census every 5 years (similar to the student census as indicated in the Equity Policy), as committed to in the Integrated Equity Framework
- Introduction of an Employment Equity Plan to be completed every 5 years, that coincides with the TDSB’s workforce census
- Integration of employee data to build and maintain demographic profiles to provide better analysis of targeted hiring, promotion and education initiatives
- Consideration to annual reporting on employment equity targets and achievements (with creation and consultation process similar to School Improvement Plans)
- Embed in the Policy the Special Programs Provision under Section 14 of the Human Rights Code
- Clarification of Section 4.5 of the current Policy which states that “Designated groups shall be the focus of employment and promotion strategies, but not to the exclusion of other groups,” to mitigate misinterpretation.
- Recommence the Leadership and Mentoring Program for racialized and Indigenous teachers and staff, as committed to in the Integrated Equity Framework
- Expand existing “Positive Space Campaign” launched in the Gender Based Violence Prevention Office to bring visibility and support to Sexual and Gender

Diversity, as committed to in the Integrated Equity Framework

- Review employee services practices and ensure consistency with OHRC regarding access to religious holy days, mental health days and revisions to modernize the current Miscellaneous Day criteria and expectations around evidence submission and approvals.
- Commitment to developing and delivering in-services on Inclusive Workplace strategies across the system, as committed to in the Integrated Equity Framework

A review of leading practices for similar policies across jurisdictions has been completed and is included with this Work Plan.

Phase III. INTERNAL REVIEWS AND SIGN-OFFS

The Policy review will include TDSB divisions affected by the Policy:

- Leadership, Learning and School Improvement
- School Operations and Service Excellence
- Business Operations and Service Excellence

In addition, the following departments will be required to sign-off on the proposed Draft Policy:

- Legal Services
- Governance and Board Services
- Government, Public and Community Relations

A sign-off from the Director of Education will be obtained before proceeding with external consultations and/or Committee/Board approval.

- Director of Education

Phase IV. EXTERNAL CONSULTATIONS

Are external consultations applicable to this Policy?

- Yes
- No (*Ministry of Education mandated policy or corporate policy without external stakeholders*)

Mandatory external consultations will include, at a minimum:

1. Posting of the working draft Policy on TDSB website for public feedback: **90**

days

2. Extending invitations for consultation to:

Student Senate

and;

all Community Advisory Committees of the Board and conducting consultations with the Community Advisory Committees that expressed interest (either individually with each interested committee or collectively with representatives of all interested committees): **Winter 2019-Spring 2020?**

- Alternative Schools Community Advisory Committee
- Black Student Achievement Community Advisory Committee
- Community Use of Schools Community Advisory Committee
- Early Years Community Advisory Committee
- Environmental Sustainability Community Advisory Committee
- Equity Policy Community Advisory Committee
- French-as-a-Second-Language Community Advisory Committee
- Inner City Community Advisory Committee
- Parent Involvement Advisory Committee (PIAC)
- Special Education Advisory Committee (SEAC)
- Urban Indigenous Community Advisory Committee

In addition to mandatory consultations, other external participants and projected dates of consultation(s) include:

- School Councils
- Professional Associations and Unions
- Other:

The following methods will be applied in the external consultations:

- Public meeting
- Facilitated focus group
- Call for public delegations
- Expert panel discussion
- Survey

- Posting on the TDSB website
- Other:

Phase V. COMMITTEE/BOARD APPROVALS

Following external consultations and revisions, the working draft Policy will be presented to the Governance and Policy Committee on the following date: [June 2020](#)

Following recommendation by the Governance and Policy Committee, the revised Policy will be presented to the Board on the following date: [June 2020](#)

Once approved, the revised Policy will replace the existing policy on the TDSB website.

Phase VI. IMPLEMENTATION

Following Board approval, the final revised Policy will be communicated through:

- Posting of the revised Policy on the TDSB website through the Policy Coordinator
- Sharing with staff through the System Leaders' Bulletin
- Informing departments at staff meetings and channeling information to the school principals through respective superintendents
- Implementation of a broad communication plan for internal and external audiences, include summary of policy revisions and expected outcomes

Policy implementation will include:

- Conducting information/training sessions to TDSB staff affected by the Policy as required

The projected time period for conducting information/training sessions to staff will be: [Fall 2020](#)

- Review of associated procedures or initiate development of new procedures, as applicable.

Scan of Selected Ontario School Boards and Other Jurisdictions: Employment Equity Policy

The Toronto District School Board's (TDSB) Employment Equity Policy (P023) was adopted on June 23, 2004 and last updated in March 2012. The Policy reflects the Board's commitment to the development, implementation and maintenance of employment and promotion policies, practices and procedures that result in and sustain a workforce that, at all levels, reflects, understands and responds to a diverse population.

In addition, the TDSB's Integrated Equity Framework, which was adopted in 2016, sets out a series of coordinated, strategic actions to focus and align every facet of the Board's work—policies, practices, program, culture through an equity lens, and anchor all of it within a coherent, comprehensive framework of Equity.

Within Ontario, there is no standalone employment equity legislation to cover provincially-regulated employers similar to that of the *Employment Equity Act* which governs federal public sector employers with over 100 employees. Only one province, Quebec, has employment equity legislation - the *Act Respecting Equal Access to Employment in Public Bodies* – which covers provincially regulated employers such as school boards, municipalities, transit authorities, universities and colleges, health and social service agencies. Instead, Ontario's legislative framework which governs employment equity spans across the Ontario Human Rights Code, the *Pay Equity Act* (Ontario), the *Occupational Health and Safety Act* and the *Accessibility for Ontarians with Disabilities Act*.

Together, these legislative acts place specific obligations on all employees to treat employees fairly and to create workplaces that are free from barriers, discrimination, harassment and violence.

This scan looks at best practices in school boards and other jurisdictions (see list below), including the federal level where workplaces with 100 or more are required to have employment equity policies and plans to comply with the federal *Employment Equity Act*.

Key Similarities and Differences

1. Notices and Advertisements for Vacant Positions, including Advancement Opportunities

While all jurisdictions have an employment policy that strives to fill vacant positions with the most suitable candidates for the purpose of developing and maintaining an effective and efficient workforce, all organizations scanned include a general statement on their commitment to fair-hiring practices when advertising vacant positions, specifically as it relates to removing barriers for disadvantaged persons.

One organization (e.g., University of New Brunswick), for example, takes measures to remove barriers for entry for underrepresented communities by reviewing all job postings. Consistent with what is echoed in *Ontario's Education Equity Action Plan, 2017*, this includes eliminating unnecessary, discriminatory barriers which would screen out potential employees for reasons unrelated to qualifications, merit or job requirements. For the selection of candidates, nearly all jurisdictions (e.g., University of New Brunswick) included an employment equity mechanism in their policy which applies where the group of candidates on the short list are judged to be relatively equal in terms of the overall assessment. When there is no short-listed candidate who demonstrates higher qualification, and there is a short-listed candidate from a designated group for which a hiring goal exists (per the employment equity plan), the designated group candidate will be recommended for the position. When there are short-listed candidates from more than one of the designated groups who are judged to be relatively equal in terms of the overall assessment, and there are hiring goals related to more than one group, the goal with the least amount of progress should have precedence.

The TDSB in its current policy states the Board's commitment to fair-hiring practices, including sustainment of a workforce that, at all levels, understands and responds to a diverse population.

2. Special Programs Provision

Several jurisdictions scanned define and/or include a Special Programs provision (e.g., City of Toronto, Ryerson University). The Special Programs provision falls within the Canadian Charter of Rights and Freedoms (s. 15(2)). The Charter, as part of the Canadian Constitution, is the supreme law of Canada. As such, it has precedence over all other legislation with exception to the Constitution. Special Program provisions are protected under federal and provincial human rights legislation, including the Ontario Human Rights Code (OHRC).

Essentially, this legislation allows organizations to develop "special programs" to help disadvantaged groups improve their situation. The Code and the Canadian Charter of Rights and Freedoms both recognize the importance of addressing historical disadvantage by protecting special programs to help marginalized groups. The Supreme Court of Canada has also recognized the need to protect "programs" established by legislation that are designed to address the conditions of a disadvantaged group. *Organizations do not need permission from the OHRC to develop a special program.* This means that special programs can be put in place without delay.

Under Section 14 of the Code, it is not discrimination to put in place a program if it is designed to:

- Relieve hardship or economic disadvantage;
- Help disadvantaged people or groups to achieve, or try to achieve, equal opportunity; or
- Help eliminate discrimination.

A program must satisfy at least one of these points to be considered a special program under the Code.

Examples of types of programs that might qualify include:

- A housing co-op keeps a set number of spaces for women who are leaving abusive relationships;
- The government funds a job program for persons under age 25 to combat youth unemployment, because a Statistics Canada study shows that youth under 25 face higher rates of unemployment than other groups;
- A government-funded community legal clinic offers its services only to people with disabilities, to help them deal with some of the systemic barriers they face.

The TDSB's current policy does not specifically reference this Program.

3. Workforce Census/Diversity Surveys

Many jurisdictions (e.g., City of Toronto, University of Calgary, York Region DSB, University of Guelph) have a workforce census or diversity surveys conducted at different stages, including pre-employment and during employment. One jurisdiction (i.e., University of Guelph), for example, invites all applicants to complete a self-identification survey for demographic purposes while also conducting an annual Diversity Matters survey for its workforce. The survey, which is administered by its Diversity and Human Rights Office, also allows individuals to confidentially self-identify with any of five underrepresented groups: women, LGBTQ+, racialized individuals, Aboriginal people, and people with disabilities. Survey results help the institution develop equity goals, while helping the jurisdiction meet reporting obligations under the Federal Contractor's Program (not applicable to the TDSB as this is a federal program). Other school boards such as York Region DSB have a Workforce Census in place and have recently begun a surveying process. This year, for example, they'll look at a demographic survey of all applicants to the vice-principal and principal promotion process so that it can track success of applicants to identify any barriers to advancement. Similarly, the TDSB has been an early adopter having conducted a Self-Identification/Workforce Census since February 2006.

4. Employment Equity Plan

Notwithstanding federal public sector employers who are required to adopt and implement an employment equity plan for their organization, some organizations (e.g., Dalhousie University, York Region DSB) have established employment equity plans. In response to a Ministry of Education direction, York Region DSB recently implemented an employment equity plan to help achieve its commitment to providing safe, equitable and inclusive environments for all students. Another organization (i.e., Dalhousie University) has both a system wide employment equity plan and unit-specific employment equity plans for academic and support areas. The plans include

employment goals for underrepresented communities and are monitored to ensure a track record of progress.

The TDSB has an Integrated Equity Framework Action Plan, which includes several employment equity related goals and expectations (see Appendix A to this scan).

5. Employment Equity Council, Leadership and Advisory Groups, or Training for Selection Committees

Many organizations reviewed have established councils, committees and advisory bodies within their structure to promote employment equity. One organization (i.e., Dalhousie University) has an employment equity council which reflects the diverse representation of members from equity-seeking groups among, with seats strategically designed for particular populations. Similarly, another organization (i.e., University of Calgary) delivers unconscious bias and selection training for its selection committees. Another organization (i.e., City of Ottawa) has formalized leadership and advisory groups to promote inclusivity, which maintains a dedicated diversity and inclusion unit to help employees resolve discrimination issues and to raise awareness in the workplace and broader community. The TDSB has an Employment Equity office and in February 2006, the TDSB established the Employment Equity Working Group.

6. Mentorship Program

One organization (i.e., City of Toronto) facilitates an ongoing mentorship partnership program which helps immigrant professionals find employment in their chosen professions. Another jurisdiction includes a mentorship program. Similarly, the TDSB established a Leadership and Mentoring Program for Racial Minority and Aboriginal Teachers in 2008 and, as part of the Integrated Equity Framework, the TDSB is looking at renewing this effort.

7. Positive Space Initiative

Most mid-to-large public service and corporate employers (e.g., Ontario Public Service, University of Calgary, TD Bank, Scotiabank) have launched various positive space initiatives, intended to create a more welcoming place, especially as it relates to sexual and gender diversity. The Positive Space Initiative in the Ontario Public Service and many Government of Canada workplaces includes training for positive space ambassadors and overall diversity training for the workforce. Ambassadors become visible in their workspace as a “positive space” for anyone dealing with sexual orientation or gender identity issues, or for anyone seeking more information on the subject. While ambassadors may not be experts on LGBTQ issues, they are committed to providing helpful resources and referrals, and to educate in contributing to a more diverse and inclusive public service. The TDSB currently does not have this initiative system wide but has committed to this within its Integrated Equity Framework. Recently, the TDSB also established a LGBTQ2+ community advisory committee.

8. Canada's Top Employer – Diversity

Canada's Best Diversity Employers recognizes employers across Canada that have exceptional workplace diversity and inclusiveness programs. This competition recognizes successful diversity initiatives in a variety of areas, including programs for employees from five groups: (a) Women; (b) Members of visible minorities; (c) Persons with disabilities; (d) Indigenous peoples; and (e) Lesbian, Gay, Bisexual and Transgender/Transsexual (LGBT) peoples.

The TDSB has announced its plan to become one of Canada's top diversity employers as part of the Integrated Equity Framework Action Plan.

9. Special Accommodation and the Notion of Undue Hardship

Most organizations (e.g., University of New Brunswick) include provisions to highlight the importance of accommodating the special needs of applicants to enable the attendance of interviews, assume employment, and perform duties, unless the accommodation would create undue hardship to the organization. Regarding undue hardship, one organization (i.e., the University of New Brunswick) states that it will determine what constitutes undue hardship and uses one example of the need to avoid excessive costs.

The TDSB's current Employment Equity Policy (P029) recognizes the importance of removing systemic barriers, affirmative action strategies and providing appropriate accommodation but does not specifically detail these efforts.

10. Awareness Strategies

One organization (i.e., University of Calgary) has approved an awareness strategy as part of its Eyes High 2017-2022 – five-year Equity, Diversity and Inclusion (EDI) Plan to build institutional pride and support for EDI through dedicated campaigns throughout the system. Example tactics have included: "Diversity Days/Diversity Weeks", marketing collateral dedicated to diversity and inclusion; diversity toolkit for leaders, academics and employees with information about resources and helpful content; and webinars focused on topics related to EDI.

The TDSB, in its current Employment Equity Policy mentions outreach activities generally, including various training and mentoring opportunities.

Best Practice in Ontario's Education Equity Plan (2017) and Other Examples

Accountability for Equity and Human Rights in Performance Appraisals

Ontario's Education Equity Action Plan suggests enhancing accountability for equity and human rights in Director of Education, supervisory officers, principals and vice-principals by including equity goals in performance plans. In another example, profiled as one of Canada's Top Employer – Diversity, Manulife recently embedded diversity and inclusion accountability into performance goals for its leadership personnel. Similarly, Amex Canada, launched a strategy to support the development and advancement of female employees. Currently, women represent 57 per cent of its senior leadership and 52 per cent of its board of directors.

York Region DSB's Employment Equity Audit and Employment Equity Plan

York Region DSB launched an employment equity audit consisting of a Workforce Census and an employment systems review in winter 2017 following directions provided by the Ministry of Education. The recommendations resulted in an Employment Equity Plan (the "Plan"), which will help the Board to achieve its commitment to providing safe, equitable and inclusive environments for all students and employees. This vision, as described in the Plan, led to tangible goals, including:

- (a) Have a workforce that broadly reflects the diversity of student population through initiatives such as prioritizing the hiring of racialized staff; mentoring for employees from equity-seeking groups; and minimizing bias and conflicts of interest in the hiring process;
- (b) Revise employment policies and procedures to remove barriers to employment and promotion;
- (c) Educate the workforce on access to needed accommodation based on any human rights protected group and supporting managers and administrators to create safe and inclusive workspaces;
- (d) Implementing Education and Training Plan to increase equity and diversity and inclusion goals and expectations.

Additional employment equity goals recommended in the Plan include:

- Visible diversity on interview panels;
- Diverse staff representation in the Human Resources Department to serve as a model for the system;
- Conduct a demographic survey of all applicants to VP or Principal positions promotion process to identify any barriers to advancement and ways to improve;
- Board to provide additional information to supervisors and employees to provide clarity for a number of issues on the "pre-identified list of faith days" to support employees to specific the days off in their request and that the list not be exhaustive. Further, employees should not be required to get addition information from their faith leader each year;
- Development of a religious accommodation policy to support an organization's legal obligation to provide religious accommodation, short of undue hardship,

including breaks, prayer space, scheduling of shifts and interviews. The policy should clearly state that any reprisal against an employee for requesting or receiving accommodation is a violation of the policy;

- Inclusion Lens to be used when developing new or revising existing Board policies.

Organizations Scanned

Dalhousie University, Durham DSB, Peel DSB, University of Calgary, University of Guelph University of New Brunswick, City of Ottawa, City of Toronto, Federal Government of Canada, Queens University, Ontario Public Service, Ryerson University, York Region DSB, Toronto Catholic DSB, Toronto District School Board

Additional Sources

Report of the Commission on Equality in Employment / Judge Rosalie Silberman Abella, commissioner: <http://publications.gc.ca/site/eng/471737/publication.html>

TDSB's Integrated Equity Framework – Employment Equity Commitments

- **Hiring Practices:** All job postings will strongly encourage applications from members of various groups including visible minorities, persons of Indigenous background and persons with disabilities. Work closely with members of our Indigenous communities and all employee groups to increase hiring of persons of Indigenous background;
- **Staff Census/Survey:** To assess our progress and inform decision-making, we will collect data through a staff census. Employee Services to analyze data on the representation of racialized groups and other marginalized groups among our staff. Corrective action will be taken where the data reveal gaps in hiring practices;
- **Staff Census/Survey:** To assess our progress we will collect data through staff census. The analysis of this data will allow us to make more informed decisions. Collect staff census data through a work-force census or through a staff/workforce/employee survey. Employee Services to analyze data on the representation of these groups among our staff.
- **Review of Programs:** Employee Services, in conjunction with our Staff Development personnel, to enhance leadership training and sensitivity to identify and remove any barriers that may exist for our employees. All existing programs will be reviewed to ensure they are delivered to reflect the Board's commitment to equity and inclusion;
- **Review of the Human Rights Policy (P031) and Workplace Harassment Policy (P034)**
- **Review practices with respect to Religious Accommodation,** to ensure alignment with recent revisions to the Ontario Human Rights Commission Policy on Creed;
- **Include Human Rights Training to the TDSB's Mandatory Training Matrix for staff;**
- **Recommence the Leadership and Mentoring Program for racialized and Indigenous teachers and staff;**
- **Develop and deliver in-services on Inclusive Workplace strategies across the system;**
- **Develop a "Positive Space Campaign" to bring visibility and support to Sexual and Gender Diversity;**
- **Provide system-wide training on Human Rights and respect in the workplace;** and
- **Submit an application for Canada's Top Employer – Diversity**

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