

2022/23 – 2024/25

Human Rights Legal
Support Centre

Accessible Operational Business Plan

Ontario 

HRLSC | Human Rights Legal Support Centre

CAJDP | Centre d'assistance juridique
en matière de droits de la personne

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Section 1: Executive Summary

The global pandemic continues to be the most significant environmental factor impacting the Human Rights Legal Support Center's (HRLSC) applicants and stakeholders. In response to this and other challenges facing Ontario, the Ministry of the Attorney General (MAG) has presented the HRLSC with a new Mandate Letter. This letter calls for support with COVID-19 recovery efforts and the HRLSC's continued delivery of inclusive, innovative, accessible, and sustainable legal advice and support services to address human rights issues.

During this planning period, the HRLSC will be focused on this process of post-pandemic recovery—and beyond—through its service delivery, programs, and activities. The activities and results reported in this year's operational business plan relate directly to navigating and overcoming the challenges of a global pandemic.

The HRLSC remains committed to serving Ontario's most vulnerable residents and communities during this time of unprecedented challenges. As COVID-19 recovery efforts progress, the HRLSC continues to confront discrimination and harassment, especially in the social areas of housing, employment, goods, services, and facilities.

A recent study by Statistics Canada shows that the pandemic continues to impact people across intersectional lines of identity. The study identified several constituencies facing increased likelihood of experiencing discrimination or being treated unfairly. These groups included gender diverse individuals and women—particularly Indigenous women. More broadly, the human rights impacts of COVID-19 were most directly felt by status and non-status First Nations, Métis, and Inuit people; and racialized individuals from Black, East, South, and Southeast Asian communities.

Human rights issues during COVID-19 have persisted in areas including housing security and living conditions, health care, access to other essential services and employment around returning to workplaces.

The HRLSC strives to continue demonstrating the importance of delivering accessible, culturally inclusive services to all Ontarians. As necessitated by the pandemic and the provincial push for further modernization, the HRLSC also continues to enhance its digital service delivery. Current digital initiatives include the HRLSC's new telephone system technology and the development on an online client service portal.

In terms of its operations, the HRLSC is undertaking every effort to protect staff against COVID-19, while continuing to provide high quality legal services. The HRLSC is fully committed to public health agencies' recommendations to help ensure that its staff will be able to return safely to in-office operations, as needed.

The HRLSC also acknowledges the importance of continuing to provide various access points for clients to connect with and receive services. A key example of this commitment is the work of the HRLSC's Indigenous Services and Outreach Committee (ISOC). ISOC staff continue to reach out to Indigenous communities and provide critical support for applicants seeking the HRLSC's legal advice and services. Receiving culturally appropriate services increases access to justice and enhances trust in a legal system that historically viewed as inaccessible and alienating for Indigenous people.

2020-2021 Progress Overview

2020-21 Targets	2020-21 Achievements
85% of clients report being very satisfied or satisfied with the HRLSC's services.	100% of clients surveyed being satisfied or very satisfied with the HRLSC's services (94% said "very good", 6% said "good").
10 positive human rights stories in the media that featured the HRLSC's services.	26 positive human rights stories in the media that featured the HRLSC's services. One case received national attention.
80 cases are settled between mediation and before/at hearing.	54 cases were settled between mediation and before/at hearing. The HRLSC's metrics for this achievement indicator is dependent upon the operation of hearings at the Human Rights Tribunal of Ontario.
70% of calls are answered.	68% of calls answered.
66% settlement rate at mediation.	68% settlement rate at mediation.
75% of hearing-stage cases settled at hearing.	71% of hearing-stage cases settled at hearing.

Section 2: Mandate

Legislative Mandate

The HRLSC is mandated under the *Ontario Human Rights Code* (the *Code*) to assist individuals whose rights have allegedly been infringed upon; using a cost effective, accessible, and efficient system that delivers legal services to eligible clients.

Vision

The HRLSC strives to be a leader in advancing equality, in protecting human rights and in supporting every person's right to live and work with dignity and respect.

Mandate

The HRLSC advances equality and protects human rights by providing a range of accessible and high-quality legal advice and support services to those who have faced discrimination contrary to the *Code*.

Alignment with Ministry of the Attorney General's Priorities

The HRLSC's vision, mandate, and core values are aligned with the priorities of the government and expectations of MAG. These priorities were communicated to the HRLSC by the Minister via a Mandate Letter dated September 20, 2021, including:

Service Delivery

- Competitiveness, Sustainability and Expenditure Management: The HRLSC is mandated by law to provide services to all Ontarians in a dynamic, fiscally responsible delivery model;
- Transparency and Accountability: Engaging in consultative processes with key stakeholders and responding to all Ontarians and communities who have experienced discrimination are core activities of the HRLSC; and
- Digital Delivery and Customer Service: The HRLSC has been part of the global growth of digital tools as demonstrated in its increased digitized service delivery, new phone technology, client portal, and reconfigured website.

Strategic Planning

- Diversity and Inclusion: The HRLSC is committed to implementing and advocating for diversity and inclusion in all aspects of its work including by updating its Human Rights and Diversity Policy;
- Risk Management: The HRLSC employs the best practices of Ontario and other provincial public service agencies, including risk management, that forecasts service demand and staffing needs;
- Workforce Management: The HRLSC maintains a human capital plan which outlines key human resources priorities, goals, and strategies; and
- Data Collection: The HRLSC collects and uses data from intake, its in-depth legal services, and other managed organizational projects to inform results-based quality monitoring and improvement.

COVID-19 Recovery

As mandated, the HRLSC is supporting COVID-19 recovery by remaining responsive to the needs of Ontarians and the *Code* as new and unique human rights issues arise out of the pandemic. The HRLSC's role in providing legal advice and support to all Ontarians has been acknowledged as essential and a vital partner by MAG in delivering of high-quality, human rights legal services. Along with the other pillars of the province's human rights system, the HRLSC experienced a surge of COVID-19 inquiries as the pandemic presented a multitude of unprecedented human rights challenges.

In all its work, the HRLSC seeks to balance its commitments to sustainability, innovation, and efficiency with the ongoing need to provide access to human rights legal services to all Ontarians using funds responsibly.

The HRLSC remains committed to its role as a steward of human rights in Ontario.

Section 3: Overview of Programs and Activities

In the 2022-2023 to 2024-2025 planning period, the HRLSC will continue to work to advance equality and protect the human rights of all Ontarians. The HRLSC will work to fulfill the priorities set out in the new Mandate Letter by continuing to integrate new digital tools into its existing services, programs, and activities. The HRLSC will continue administering a cost effective, accessible, and efficient system to provide high quality human rights information and legal services province-wide, from Kenora to Ottawa, and Sioux Lookout to Peele Island.

The HRLSC's services, programs, and activities include:

Intake and In-Depth Legal Services

Intake Line for Inquiries:

The HRLSC provides legal information and advice to individuals who believe they have been subjected to discrimination, primarily on the basis of disability, race/colour, sex (pregnancy) and family status in the areas of employment, access to services, and housing. The HRLSC's services are accessed through our phone line—which includes a call-back option for clients—operated by our intake staff.

As of April 2021, this phone service includes a priority line for individuals incarcerated at Ministry of the Solicitor General (SOLGEN) correctional facilities. The HRLSC is now tracking the number of inquiries coming from this priority phone line to help inform any decisions on future service delivery in this area. These inquiries are logged and tracked separately from general intake data.

In-Depth Legal Services:

The HRLSC helps individuals determine whether they have a *bona fide* human rights claim. This process includes providing basic legal advice and reviewing initial applications. If the case can move forward, the HRLSC discusses options for resolving the claim, emphasizing early intervention and dispute resolution when possible. If early settlement is not possible, the HRLSC helps resolve human rights claims, including by preparing qualifying individuals to apply for redress to the Human Rights Tribunal of Ontario (HRTO).

Over the past five years, the HRLSC has responded to more than 21,000 inquiries annually, receiving approximately 100 calls per day. The HRLSC has also provided detailed legal advice to more than 1,800 callers on average annually over a five-year period.

Mediations

Over the past five years, the HRLSC has represented on average more than 350 applicants per year at mediations. In 2021, 68% of applications assisted by the HRLSC were settled through mediations. There are two aspects about the HRLSC's role in mediation that are notable:

- i) generally, the HRLSC's settlement rate exceeds the settlement rate achieved by the HRTO; and
- ii) the HRLSC provides a vital service to the HRTO in helping triage settlements even before applications are filed or mediations scheduled.

Hearings

The HRLSC provides legal representation to individuals at hearings of their applications before the HRTO with a focus on public interest remedies. The majority of applications are settled before or at the hearing stage.

Settlements

The HRLSC helps negotiate settlements for individuals who apply to the HRTO. Settlements may be achieved before or shortly after an application is filed, before or at the mediation stage, or before or at hearings. The HRLSC has settled an average of more than 400 cases per year over the past five years.

Enforcement

The HRLSC assists individuals in recovering monetary settlements and enforce awards issued by the HRTO.

Judicial Review

The HRLSC assists individuals applying for judicial review of HRTO decisions, where appropriate. The HRLSC assisted individuals file and present two applications for judicial review in 2021-22 at the Superior Court of Justice (Divisional Court) and the Ontario Court of Appeal. In addition to its work supporting its clients with judicial reviews, the HRLSC will also continue to monitor decisions on cases that are relevant to Ontario's human rights system.

Digital Transformation

To align the HRLSC with government-wide priorities and proactively meet MAG's expectations, the HRLSC continues to investigate the suitability of additional digital tools. The HRLSC's rollout of new digital features for clients is in addition to client service tools currently in use. The HRLSC's digital development plan for the current planning period includes:

- operating its new, web-based telephone system;
- planning the development of a new client portal site; and
- initiating the redesign of the HRLSC's website with an emphasis on enhancing its accessibility and functionality.

Further details of digital tool developments are included in Section 7.

These services are in addition to the HRLSC's pre-pandemic online resources which continue to provide clients with extensive self-help, procedural information, and tools to clients about their human rights. Through its currently available online services, the HRLSC supported 266,796 visits to its website in the 2021-22 period.

Impacts of COVID-19

The work of the HRLSC, and the demands on its services, programs, and activities continues to be impacted by the COVID-19 pandemic. The HRLSC's service delivery model has evolved and will continue to adapt as the pandemic continues and post-pandemic recovery planning unfolds. The HRLSC utilizes virtual platforms including Zoom and Microsoft Teams to connect staff and communicate with clients. Zoom and Teams are also used for participation in HRTO proceedings.

Beyond managing the COVID-19 pandemic, the HRLSC is leveraging adaptation and innovation to continue to provide high-quality services, programs, and activities in the post-COVID-19 environment.

Service Standards

Client data continues to drive the HRLSC's quality of service, programs, and activities, with enhanced attention on:

- reducing wait times for callers;
 - ensuring high settlement rates where possible; and
 - assessing and maintaining high rates of client satisfaction.
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Section 4: Environmental Scan

External Factors

Status of the HRTO

Along with the issues encountered during COVID-19, the HRTO continues to face challenges filling adjudicator vacancies. These vacancies have resulted in delays processing applications and scheduling hearings. These delays have also had a profound impact on the HRLSC's clients, many of whom have been waiting many months, or even years, for their applications to be heard. The HRTO has pledged to address the need for adjudicator appointments. The HRLSC is of the understanding that the HRTO is in the process of developing a plan to address its backlog. The HRLSC offers to look for collaborative and innovative ways to work with the HRTO.

The HRLSC is also monitoring the roll-out of Tribunals Ontario's new portal system. While this system is being introduced at the Landlord Tenant Board, the HRLSC is interested in seeing how it transforms client service and impacts administrative speed. The HRLSC awaits word about the implementation plan of a portal service at the HRTO.

In light of the above challenges, the HRLSC is pleased to be working with the new leadership at Tribunals Ontario and is looking forward to productive discussions with HRTO leadership. The HRLSC's legal staff continue to work closely with its clients as they wait on HRTO and encourages early dispute resolution and mediation where possible.

Continuing Trends under COVID-19

In accordance with its mandate, the HRLSC continues tracking notable incidents of racial violence, hate speech, and discrimination in the form of anti-Asian, anti-Black, and anti-Indigenous racism, Islamophobia, and antisemitism during the COVID-19 pandemic and beyond.

These incidents take a measurable toll on those experiencing discrimination and harassment. Studies by groups such as the Canadian Race Relations Foundation indicate that discrimination or harassment during COVID-19 have negatively impacted the sense of safety and well-being for members of racialized communities. The HRLSC continues to see increased calls for legal reform and policy changes in areas relating to its mandate, including:

- supporting the implementation of the recommendations of the Truth and Reconciliation Commission;
- addressing Islamophobia, anti-Black and anti-Asian racism, and antisemitism;
- promoting the rights of non-binary, transgender, and two-spirited individuals; and
- challenging systemic workplace sexual harassment, in terms of campaigns such as the #MeToo and Time's Up movements.

Additionally, over the past several months, the HRLSC has experienced surges in inquiries relating to government announcements, particularly regarding Ontario's COVID-19 vaccine passports, public mask mandates and vaccination mandates. As the provincial government continues to grapple with the ever-changing COVID situation and its post-COVID recovery planning, the HRLSC will continue to closely monitor the impact on individual rights, as well as the impact on our operations. As the situation rapidly evolves, the HRLSC will need to be nimble, accessible and well-resourced to respond to individuals who seek legal redress for new issues that intersect with the values and grounds found in the *Code*.

COVID-19 Labour Recovery

Several key provincial legislative bills were introduced in 2021 in support of higher wages, benefits and sick days, new protections for temporary and "gig" workers and other changes such as the "right to disconnect." These moves signal the importance of dignity and equality for workers to ensure Ontario's successful recovery from COVID-19. In this light, the HRLSC's work in the 2022-2023 to 2024-2025 planning period will be critical in protecting workers and workplaces from discrimination and harassment. Further indicators about the importance of ensuring access to the HRLSC's legal services and advice include:

- The persistence and continued prevalence of employment-related cases at the HRTO:
 - In its 2021 Annual Report, the HRTO reported more than half (55%) of the applications it received continued to relate to employment.
- The initial imbalance in rehiring during the COVID-19 recovery:
 - While recent labour statistics in November 2021 showed a relative increase in hirings for members of some racialized communities, employment rates for Indigenous workers remained stagnant and dropped by 3% for Black Canadians.
 - Since the beginning of the pandemic, there has been disproportionate economic fallout on women, reflected in a distinct and noticeable gendered-employment loss as reported by academic Dr. Sylvia Fuller and organizations including Ontario Chamber of Commerce.
 - Recent research from Statistics Canada, Ontario Chamber of Commerce and the Canadian Centre for Policy Alternatives confirms that Indigenous and racialized workers, especially women, were both at higher risk for contracting the virus at their jobs and higher risk for losing their jobs.

The HRLSC continues to play a significant role in ensuring the provincial government's support plan for workers. The HRLSC's work can help empower employers to embrace a return-to-work plan that is equitable and representative of the diverse communities found across Ontario.

Supreme Court of Canada Decisions

The HRLSC continues monitoring Court decisions and their potential impact on future applications and HRLSC clients. Two recent Supreme Court of Canada decisions are of specific interest to the HRLSC as they may have an impact on future service delivery and HRTO jurisprudence.

Ward v. Québec (Commission des droits de la personne et des droits de la jeunesse)

The Supreme Court overturned the Québec Human Rights Tribunal's finding that comments by a comedian towards a disabled artist were discriminatory.

National Regional Health Authority v. Horrocks

The Supreme Court ruled that labour arbitrators have exclusive jurisdiction over human rights disputes in unionized workplaces. This decision, while primarily relating to legislation in Manitoba could provoke interested parties to challenge employment-related applications in Ontario.

Internal Factors

Structural Changes and Labour Relations During COVID-19

As part of its response to the COVID-19 pandemic and in part, informed by its client service data, the HRLSC will implement new digital technologies to serve clients remotely. This work includes finalizing the development of its online client portal and the continued redevelopment of its website to deliver increased services online.

The HRLSC has also supported staff working remotely during the pandemic using its online internal communications digital tools including platforms that attend to employee well-being (using platforms such as Zoom, Teams and SharePoint). Like many public sector agencies, the HRLSC will be implementing an in-office, return-to-work plan for staff that follows Ontario Public Service guidelines on vaccine mandates.

Workforce Demographics: Turnover of Experienced Staff

This past year, the HRLSC continued to experience the departure of senior legal staff, primarily due to the HRLSC's inability to offer competitive salaries. Such turnover impacts the HRLSC's capacity to provide legal services, most significantly at the hearings stage. Turnover also impacts corporate memory, mentorship and morale. To ensure continued high-quality service to Ontarians, vacant positions were quickly filled and new staff members were fully trained.

The HRLSC continues to investigate measures to improve retention of its current complement of experienced lawyers. The HRLSC's currently static budget and non-competitive compensation levels affect its capacity to recruit and retain senior legal professionals. This continues to be a serious challenge for the HRLSC.

Section 5: Strategic Directions and Implementation Plan, Environmental Influences, Risks and Key Assumptions

The needs flagged in the environmental scan for this planning period (see above Section 4) and the Ministry's Priorities outlined in its Mandate Letter continue to align and fit within the HRLSC's broader strategic directions and implementation planning.

Overall Performance Goals and Priorities

This planning period's Operational Business Plan supports the following key strategic priorities:

- advancing equality through legal advocacy;
- ensuring access to legal and support services; and
- championing human rights in Ontario.

Advancing Equality Through Legal Advocacy

High-level performance goals during the planning period will focus on the strategic and effective use of resources to:

- Seek further ways to integrate the HRLSC's enhanced telephone systems, as well as its online and web portal client engagement tools into the HRLSC's existing services, and explore and develop other digital platforms to support and increase effective and accessible service delivery beyond the COVID-19 pandemic;
- implement fully the upgraded case management system to support managing a demanding caseload with reduced human resources;
- support clients in the transition to digital communications regarding their applications to the HRTO; and
- advise applicants capable of self-representation and represent applicants who face barriers and require legal representation.

Ensuring Access to Legal and Support Services

High-level performance goals during the planning period will focus on the strategic and effective use of technology and human resources to:

- find cost-effective ways to ensure access for all Ontarians;
- provide timely responses to telephone inquiries and requests for client interviews;
- implement continued digitization and digital modernization of legal information;
- support ISOC's efforts to serve and support Indigenous people and communities;
- pursue targeted outreach to communities across Ontario with members who are racialized, have been subject to anti-Black racism, Islamophobia and antisemitism, gender-based discrimination, ableism, and status and non-status Indigenous individuals;
- continue preparing standardized evaluations for the HRLSC programs and activities to improve services for clients;
- continue to investigate the possibility of receiving access to the HRTO's digital files;
- maintain regional presences through innovative work arrangements with staff, including in northern Ontario in consultation with ISOC and local Indigenous communities;
- utilize a web-based feedback tool to measure client satisfaction and inform service quality;
- continue to use web-based surveys, as well as client and stakeholder feedback and interviews to evaluate and redesign the HRLSC's website; and
- identify further opportunities for training on diversity, equity, anti-oppression, and mental wellness for all staff.

Championing Human Rights in Ontario

High-level performance goals during the planning period will focus the HRLSC's resources to:

- continue collaborating with Ontario's two other human rights system pillars (OHRC and HRTO)—which includes enhanced joint community engagement — to address critical system needs post-pandemic;
- continue to engage the public, conduct educational presentations, and promote the HRLSC's services;

- continue to walk the path of reconciliation with Indigenous peoples through the advice and direction of ISOC;
- ensure that the HRLSC's Board and staff continue to be representative of the communities and cultures that the HRLSC serves;
- engage the staff-composed Equity, Diversity and Inclusion Committee to update the HRLSC's Diversity and Inclusion Policy and Plan and review policies for compliance; and
- improve engagement with Ontario's Francophone community and include Francophone speakers at the HRLSC.

Evaluating our Performance Goals

Where applicable, the HRLSC gathers data on service delivery at all stages from pre-application to enforcement and judicial review. The HRLSC continues to leverage its ongoing statistical evaluations of client services, programs, and activities while exploring additional opportunities to measure and further quantify service impacts to assess and attain strategic goals.

Section 6: Human Capital Plan

To respond to its changing budgetary needs while preserving the scale and resources of operational delivery, the HRLSC will maintain an adaptive and dynamic human capital plan.

Strategic Context

The HRLSC's capital planning reflects its core values: substantive equality, accessibility, excellent quality of service, and transparent processes. At the HRLSC, human capital planning is integrated with operational and service planning. These values are considered throughout the HRLSC's human resources decision-making.

Board Composition

The HRLSC is governed by a Board of Directors. The Board consists of no fewer than five and no more than nine Directors. Directors are appointed by the Lieutenant Governor-in-Council. There are currently eight Directors. The HRLSC strives to ensure that the Board is representative of the diversity of Ontario's population and representative of the geographic regions of the province.

Staff Composition

Alongside the HRLSC's Board of Directors and management team are full-time and part-time staff. Approximately 45% of the HRLSC's staff are members of the Ontario Public Service Employees Union (OPSEU), Local 5118. The HRLSC-staff collective agreement expired at the end of 2021. Notice to bargain was received in October 2021 and negotiations for a new agreement are expected to begin in early 2022.

Staff

Type	2021/2022	2022/2023	2023/2024
Permanent	44	44	44
Part-Time	0	0	0
Temporary	2	2	2
Total	46	46	46

Type	2021/2022	2022/2023	2023/2024
Management (inc. 3 exec positions)	8	8	8
Lawyer Group	13	13	13
Union - OPSEU	21	21	21
Non-Union	4	4	4
Total	46	46	46

Human Resource Strategies

The HRLSC's overarching goal is to maintain a safe, diverse, inclusive and healthy workplace free from *Code* based discrimination, harassment, and violence. Service delivery needs, strategic goals, staff retention, and fiscal realities are the most significant factors impacting human capital planning and management at the HRLSC. The HRLSC will continue to approach human capital planning with flexibility and innovation that support its human capital, mandate, operational and strategic plans.

Human Capital Planning Goals

The overarching priorities for the planning period include:

- planning a safe return to in-person work while protecting the health of staff;
- maintaining a diverse, inclusive and healthy workplace, including meeting or exceeding employment equity goals;
- providing competitive and sustainable salary structures for unionized and non-unionized staff;
- protecting confidential staff information;
- achieving effective succession planning for the Board and the HRLSC's senior staff;
- encouraging ongoing professional development by providing staff opportunities for training on providing service and support to communities with accessibility needs, to members of 2SLGBTQ+ and Indigenous communities as well as to address Islamophobia, antisemitism, and anti-Asian hate;
- preserving staffing that promote service flexibility and digital service delivery; and
- delivering effective management training to support staff.

COVID-19 Recovery Planning

Over the planning period, it is expected that the HRTO (who have been hampered by the global pandemic and a reduced number of adjudicators) will return to normal levels of operation. As the HRTO returns to normal levels of operation, the HRLSC anticipates a potential surge in mediations and hearings and a corresponding increase in demand for services. It is further anticipated that the HRLSC will require two additional legal counsel, one legal case coordinator and one additional intake staff member to field inquiries on the HRLSC's phone line to supplement our current staffing

levels. Given the HRLSC's current funding levels, it will be difficult to address the demands on its resources. The HRLSC will continue to monitor the HRTO's operations and will be looking to the Ministry for additional financial support to address the increased demand.

Compensation Strategies

The HRLSC's compensation strategies continue to comply with the *Protecting a Sustainable Public Sector for Future Generations Act, 2019 (Bill 124)*. The HRLSC has developed principles to ensure equity and consistency in compensation.

Unionized and Non-Union Staff

The HRLSC's compensation strategy for its unionized employees continues to be guided by the collective agreement between the HRLSC and OPSEU. The HRLSC's non-unionized employees' salaries are believed to be within market rates. The HRLSC has undertaken a comprehensive compensation review to ensure appropriate comparators are being used to set salaries. This review will examine the HRLSC's current job evaluation plan, salary bands, compensation policy, and its salary implementation and sustainability plan and will guide all future compensation strategies.

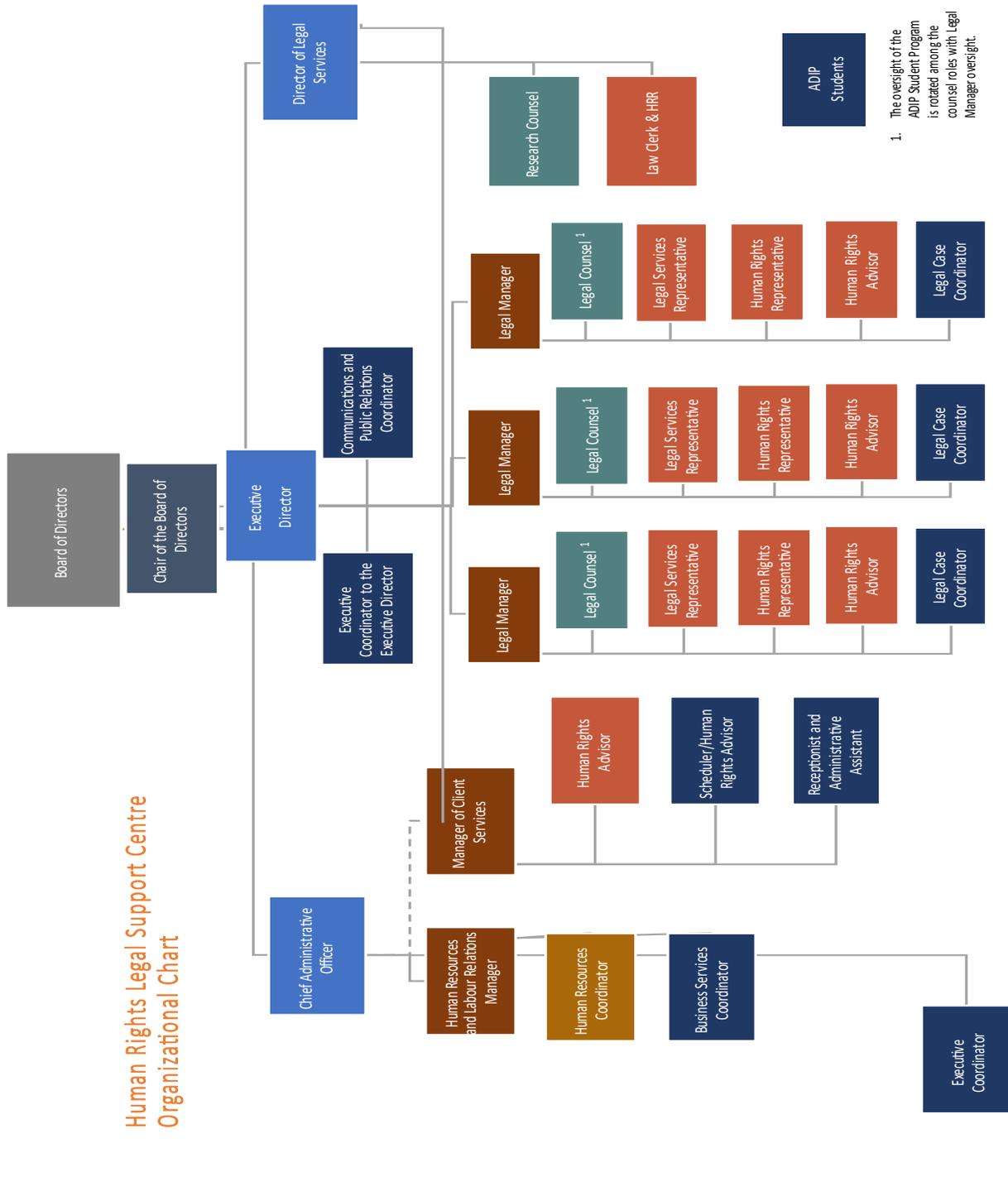
Lawyers and Legal Managers

The HRLSC's legal staff salaries are significantly below market comparators. This discrepancy continues to impact recruitment and retention of our legal staff which affects the HRLSC's operations due to frequent turnover. Working with a static budget exacerbates the issue of compensation disparities for lawyers and legal managers over time. These inequities continue to be a serious challenge for the HRLSC. Additionally, low salaries for lawyers and legal management at the HRLSC have a disproportionately negative impact on racialized and Indigenous lawyers. Such low salaries perpetuate systemic disadvantages for professionals from marginalized communities who tend to work in human rights, social justice, and public service-related positions.

Executive Compensation

The compensation strategy for the HRLSC's three executive positions complies with the *Broader Public Sector Executive Compensation Act*, however, compensation remains significantly below market comparators.

Organization Chart



Section 7: Information Technology (IT)

In accordance with government-wide priorities, the HRLSC is implementing digitized and online service delivery while continuing to accommodate clients who face barriers to using information technology.

The HRLSC's key projects in this field include:

Bell Total Connect

The HRLSC's new intake telephone system is helping to manage the volume of calls, using staff scheduling and the features of the new telephone system. As a web-based phone system, Bell's Total Connect software reduces the HRLSC's reliance on office infrastructure; is more stable and enhances exchanges of information between clients and staff during initial intake calls. This software's call-back feature increases efficient use of time for the HRLSC staff and clients and provides dedicated queues for Indigenous and incarcerated callers.

This software also aligns with the HRLSC's business continuity plans, as the web-based phone system enables staff to work from any external location. As a result, the HRLSC no longer requires an alternative location with hard-wired phone lines to provide service in case of technical difficulties or operational disruption.

Digital Onboarding Portal

The HRLSC is also prioritizing digital client onboarding by developing a new client portal to increase support and integrate electronic service delivery. Current online service development focuses on:

- completing implementation of a client portal;
- increasing the capacity of the HRLSC's automated interview scheduling module to enhance efficiency and ease of access for clients;
- allowing clients to upload their own documents;
- issuing automated electronic interview reminders; and
- requiring PIN verification to access the HRLSC's services.

These innovations will ensure flexibility in service delivery and support the HRLSC's management of its changing caseload. PIN verification will also ensure the security of service users' information. Feedback received from staff through client and website user surveys will continue to inform digital services planning.

Open Data

The HRLSC has taken steps to improve its open data sets, providing information on:

- the HRLSC's services;
- employment equity measures;
- the status of interviews; closed files; and
- client feedback.

Key users of these insights include members of the media, stakeholders, and researchers.

Website

The HRLSC continues to redesign its website by exploring ways of integrating online tools and legal information to provide a more curated, interactive and user-friendly platform. The renewed website will increase the ability of the HRLSC to collect data to inform future improvements from user-centered perspectives.

The HRLSC website and online portal enhance support for client services and increase access for clients to important resources, resulting in increased staff time efficiencies at intake and when providing in-depth legal services.

The following objectives also inform redesign of the HRLSC's website:

- enhancing the general user experience including usability and accessibility;
- increasing site utilization such as through metrics including page views, visits and traffic;
- creating seamless, user-friendly interaction between the new client portal and the HRLSC website; and
- maximizing ease of navigation especially for mobile access;

The HRLSC will continue to utilize analytics to monitor and interpret site usage and inform changes to its website. The HRLSC also uses analytics from its social media and website traffic to assess and adjust communications strategies and products.

As funding permits, the HRLSC will continue to explore the use of web-based tools, to convey information about human rights and its legal services in responsive, creative, and accessible formats.

IT Upgrades

In this planning period, the HRLSC continues to seek opportunities for efficiencies in service delivery by enhancing internal tools including upgrading and customizing its case management system. Longer term, the HRLSC's IT systems will be updated to increase further the scope and functionality of statistical data collection.

Section 8: Initiatives Involving Third Parties

Pillars of the *Code*

The HRLSC continues to seek opportunities to engage and collaborate with the HRTO and the OHRC. The HRLSC refers media inquiries to the OHRC. Publications by the OHRC relating to new interpretations of provisions of the *Code* are amplified by the HRLSC's social media. The HRLSC participates in the OHRC's various advisory groups and supports the OHRC's inquiries. In return, the OHRC regularly shares the HRLSC's social media content. Additionally, the HRLSC's leadership meets monthly with our counterparts at the OHRC and the HRTO. Three pillar meetings are also held at least twice a year.

The HRTO

The HRLSC looks forward to working with the HRTO, which is set to welcome in new leadership as this transition and planning period begins. The HRLSC continues its plans for providing effective access and connection to HRTO services for applicants during and after the COVID-19 pandemic. The HRTO's capacity to process applications may increase significantly as new adjudicators are

appointed. This recruitment may significantly impact the capacity and workflow of the HRLSC moving forward.

New Partnership with SOLGEN

The HRLSC is developing materials to promote its services at Ontario's correctional facilities in partnership with SOLGEN. This pilot project is in its initial stages. The HRLSC has agreed to produce posters that will increase the understanding and awareness of human rights and our services to all correctional facilities across the province. The approved poster design includes the HRLSC's priority telephone line for inmates. Posters will be delivered and posted in common areas of SOLGEN facilities to raise awareness for staff and inmates.

OHRC's Indigenous Reconciliation Advisory Group

The HRLSC is a member of the OHRC's Indigenous Reconciliation Advisory Group. This group was created to inform and advise the work of the OHRC.

OHRC's Community Advisory Group

The HRLSC also participates in the OHRC's Community Advisory Group (CAG), a partnership established to advise the OHRC on implementing its strategic priorities. Participation in the CAG strengthens the HRLSC's relationships with representatives of various human rights stakeholders, organizations and communities who also sit on the advisory group.

Anti-Discrimination Intensive Program

The Anti-Discrimination Intensive Program (ADIP) continues to be an important experiential learning partnership for the HRLSC. This award-winning program places 12 Osgoode Hall law students with the HRLSC each year. The ADIP students augment the HRLSC's telephone intake capacity and assist the HRLSC's staff in their work with clients, including summary advice, mediations and hearings. The HRLSC's ADIP students continue to be integral members of the intake team during the increase of inquiries relating to COVID-19. The HRLSC's ADIP students will continue to enhance the capacity and innovation of the HRLSC's services.

Legal Aid Ontario and Legal Clinics

The HRLSC will continue to participate in Mobile Justice Clinics, in partnership with Legal Aid Ontario, to offer free legal consultation in several areas, including human rights law. This initiative also builds relationships with Indigenous legal workers in southwestern Ontario and with London's legal clinic staff.

The HRLSC will continue to partner with various community legal clinics to promote its services and provide information for appropriate referrals. The HRLSC's staff will continue to participate in community activities, in-person or virtually, with legal clinics across the province. These partnerships increase access to justice for individuals who experience human rights discrimination and enhance awareness of the HRLSC and Ontario's human rights system.

***Pro Bono* Students Canada**

ISOC, along with the OHRC, the Canadian Human Rights Commission and the Ontario Federation of Indigenous Friendship Centres, continues to support *Pro Bono* Students Canada's Indigenous Human Rights Program.

The program delivers culturally appropriate human rights assistance to Indigenous individuals and communities. The HRLSC provides expertise to train the student participants.

Government of Canada, Department of Justice

In 2019, the HRLSC began its partnership with Justice Canada to implement a program to support individuals subjected to workplace sexual harassment. The Sexual Harassment and Assault Resource Exchange program continues to provide information, outreach and legal advice to survivors. As this program continues to run, it seeks to build on its community outreach efforts and grow referrals for its services.

Barbra Schlifer Commemorative Clinic

The HRLSC collaborates with the Barbra Schlifer Clinic to offer women who have experienced sexual harassment or sexual violence greater access to justice. Through direct, mutual referrals and training activities, the HRLSC and the Schlifer Clinic share resources and expertise to provide effective legal supports and engage in safety planning for individuals impacted by gender-based violence. Referrals from the Schlifer Clinic to the HRLSC address the right to be free from sexual harassment. Referrals to the Schlifer Clinic from the HRLSC are made to provide individuals with additional supports in family and immigration law matters and access to counselling, where appropriate.

Section 9: Communications Plan

The HRLSC has a flexible communications strategy that provides the public with information about its services and activities as well as human-interest stories about human rights and discrimination.

Ongoing Communications Strategies

- creating regular opportunities with mainstream, community, and in-house digital media to bring the HRLSC's clients' stories to the public's attention across the province;
- consolidating relationships with partner organizations through regular, targeted, digital communications;
- increasing accessibility through the refurbishment of existing online resources and website and growth of new formats of digital content; and
- designing products that promote and support the rollout of new digital tools.

Target Audiences

- residents of Ontario;
- hard-to-reach, under-served and economically disadvantaged, newcomers and linguistic minority communities;
- members of Indigenous communities including (but not limited to): status and non-status individuals identifying as First Nation, Métis, and Inuit.
- community agencies serving *Code*-designated constituencies locally, regionally and province-wide;
- point-of-access service providers such as settlement agencies, 211, and call centres such as the Ministry of Labour's Employment Standards hotline;
- community legal clinics; and
- community and human rights organizations and networks in Ontario.

Key Messages

- “There is help for people in who have experienced discrimination.”
- “The human rights system provides an accessible, affordable, alternative to civil courts.”
- “Discrimination continues to have a negative impact on Ontarians in their everyday lives including in workplaces, accessing services, and searching for or maintaining housing.”
- “Employers, service providers and landlords need to uphold human rights and abide by the law.”
- “The HRLSC can help resolve human rights cases through dispute resolution and settlements which include systemic solutions to protect people living in Ontario from future discrimination.”

Communications Products

Traditional Media

The HRLSC has established itself as a trusted resource for journalists on human rights and access-to-justice issues. The HRLSC maintains and enhances relationships with mainstream, specialty, as well as language, cultural and community-specific media.

The HRLSC crafts messages related to emerging issues and topics specifically to its target communities and provides contextual information on human rights and/or discrimination to traditional media. The HRLSC plans to continue to provide information and data, as resources allow.

Social Media

The HRLSC is working to maintain its social media presence in English and French to provide bilingual public awareness and understanding of human rights, discrimination, and its services. The HRLSC seeks to leverage its French social media presence using networking and content designed to build connections and engagement with Francophone newcomer communities. These projects are ongoing.

The HRLSC is also responsive to the trend of increasingly visual and video-based content by utilizing its existing in-house tools and resources compliant with accessibility standards.

Website and Digital Tools

The HRLSC’s website is an important tool for communicating with individuals, stakeholders, and the public. In the upcoming planning period, enhancing access to its digital services will be a priority. The HRLSC also plans to update its website to increase functionality and accessibility. In addition, the HRLSC plans to enhance its existing digital tools to increase the speed and efficiency of legal services at intake.

Accessibility

The HRLSC will continue to utilize community and stakeholder consultations, as well as audience surveys, campaign evaluations, post-event feedback, and client service reviews to ensure the highest standards of communications. These sources will also directly inform the HRLSC’s development of proactive measures to ensure the accessibility of its materials and two-way communications— an ongoing conversation— between its staff, stakeholders, and audiences.

Section 10: Diversity and Inclusion Plan

The HRLSC is committed to continuing to foster and support a safe, barrier-free, anti-racist, anti-colonial environment for everyone, with an emphasis upon employee-led discussion and policy-shaping.

The HRLSC acknowledges the existence of systemic racism in Ontario and is committed to proactively ensuring that all its workplace policies and practices are fair and equitable. The HRLSC's accessibility and inclusion initiatives engender a diverse workplace. Almost 40% of the HRLSC's management team identify as Black, Indigenous, and racialized individuals.

The HRLSC has adopted equity-related initiatives to support a diverse workplace, including a comprehensive ongoing program of staff training on equity, diversity, and inclusion. At the beginning of the 2022-2023 to 2024-2025 planning period, the HRLSC has delivered education sessions on anti-Black racism; Indigenous cultural awareness; mental health crisis; vicarious trauma; and suicide prevention for all staff.

Additionally, during the planning period, the HRLSC will:

- include equity/cultural competency in regular staff performance appraisals;
- incorporate the values of diversity, equity, and cultural competence as criteria in all job competitions;
- provide mandatory accessibility, equity, diversity, inclusion, and human rights training to all staff and students, where financially possible. This includes trainings to support: people with varying levels of accessibility; 2SLGBTQ+ communities; and confronting anti-Indigenous and anti-Black racism, Islamophobia, antisemitism, and anti-Asian hate;
- provide training and resources to staff to meet the Truth and Reconciliation Commission's Calls to Action #27 and #57 for legal professions and the public service; incorporate mechanisms for feedback on accessible services; and
- engage French-speaking staff and provide them with spaces at work to connect in French.

In accordance with the Law Society of Ontario's obligations for all licensees, the HRLSC's lawyers and paralegals acknowledge their responsibility not to discriminate in their professional relationships on any grounds prohibited by the *Code*.

The HRLSC will continue to update its Human Rights and Diversity Policy, using a process that ensures all voices are heard in its relevant policies and decision-making, particularly its staff-composed Equity, Diversity and Inclusion Committee (EDIC). The mandate of the EDIC is to ensure that all the HRLSC's staff feel safe and encouraged to develop their abilities, reach their potentials, and to grow as individuals.

The HRLSC continues to support learning and professional development opportunities for staff to help address equity and diversity issues facing employees heading back to workplaces and broader human rights issues in post-pandemic workplaces.

Section 11: Multi-Year Accessibility Plan

The HRLSC has a comprehensive Accessibility and Accommodation Policy in accordance with the Integrated Accessibility Standards Regulation under the *Accessibility for Ontarians with Disabilities Act (AODA)*. The HRLSC continually strives to exceed these standards.

The Multi-Year Accessibility Plan summarizes the HRLSC’s commitment and approach to ensuring a barrier-free environment to better serve the public. This plan is the fundamental framework of how the HRLSC will continue to educate, support and engage its employees to fulfill the requirements of the *AODA*.

The HRLSC is currently undergoing a comprehensive review and re-design of its website which will support its commitment to *AODA* and WCAG 2.0, Level A standards. In addition, the HRLSC is developing and integrating a new client-user portal system to increase accessibility and modernize service delivery. This project includes several significant enhancements to help improve accessibility for both public users and the HRLSC’s staff, including:

- upgrading the current case management system to reduce the administrative work required from staff;
- improving ease of navigation and providing additional features and aids supporting site accessibility for clients; and
- supporting streamlined site design for improved navigation and user experience.

AODA: Customer Service

Action	Result
Feedback mechanisms in place for clients who requested accommodation in the delivery of service; follow-up with reviews if accommodation needs were not met.	Ongoing
Implement ASL (American Sign Language) Video Integration or Microsoft Teams/Zoom Integration to provide remote interpretation for hearing-impaired members of the public and clients who use ASL	Ongoing
Implement ASL Video Integration or Microsoft Teams/Zoom Integration to provide remote interpretation for hearing-impaired members of the public and clients who use ASL.	Ongoing
A review of the HRLSC’s accommodation practices was implemented; updates will be made in the future, as necessary and required.	Ongoing: reviewing and updating as required
Compliance with building accessibility requirements at the Centre’s main office	Ongoing
Alternative communications methods available upon request for clients who can’t access digital tools.	Ongoing

AODA: Training

Action	Results
Training Policies have been updated to ensure compliance with the <i>AODA</i>	Ongoing
Train staff on equity, accommodation and accessibility issues; consult with staff on training needs.	Ongoing
Support disability-related initiatives of Diversity & Inclusion Committee.	Ongoing

AODA: Information and Communications

Action	Progress
Ensure the website continues to meet the WCAG 2.0 accessibility requirements when updates, upgrades or change are made to the website.	Ongoing
Maintain website with enhanced accessibility features	Ongoing
All public documents are available in alternative formats.	Ongoing

AODA: Procurement

Action	Progress
Consideration of accessibility needs during the procurement process.	Ongoing
Procurement policies have been updated to include accessibility consideration.	Ongoing
Monitor procurement policies to ensure consistency with best practices.	Ongoing

AODA: Information and Communications

Action	Progress
All correspondence includes notification that other accessible formats are available.	Ongoing

Section 12: Three-year Financial Plan

To meet current and future business needs, the HRLSC will require effective budgetary stewardship while working with a static budget. General staffing projections, in conjunction with forecasted service demand and caseloads have been incorporated into fiscal planning for 2022 – 2023 and future years. These projections are analyzed and modified on an ongoing basis to ensure that funds are utilized most effectively and financial risks are identified early. The HRLSC will continue to monitor its budget and conduct regular fiscal assessments.

There are three key financial challenges facing the HRLSC:

1. Maintaining sufficient resources to meet operational and service needs;
2. Achieving competitive salaries (specifically for legal counsel and legal management positions); and
3. Maintaining and sustaining any increases arising from bargaining with OPSEU.

Meeting Operational and Service Demands

Planning for the upcoming three-year period includes preparing detailed analyses of previous years' expenditures and identifying efficiencies, mainly in other direct operating expenses. Examples of efficiencies include renegotiating or procuring new service contracts and accessing consolidated services or service partnerships whenever possible which may result in operating cost reductions. Costs are shared with partners, such as Osgoode Hall Law School, to support the maximization of the HRLSC's financial resources. The ADIP program provides a value of approximately \$110,000 (the equivalent of two front-line staff positions) which will continue through the planning period.

As the HRLSC prepares to address the resumption of normal operations of the HRTO, additional support will be required to meet the increased demand for front line legal services for applicants. It is anticipated that an increase of four staff positions will be required to manage the influx of requests for representation as the HRTO works to clear the backlog of cases. The HRLSC will address this issue as the post-pandemic recovery unfolds.

Achieving Competitive Salaries

The challenge related to achieving competitive salaries is managed through ongoing planning, monitoring and reviewing of human resource needs and costs, while ensuring alignment with service delivery goals, mandates and targets. Vacancy management is implemented when unavoidable. Human resource changes are planned and analyzed with the goal of achieving salaries that are competitive in the broader public sector. During the upcoming planning period, the HRLSC will undertake a comprehensive review of all non-lawyer staff positions. The HRLSC's ability to meet operational and service goals could be impacted without significant structural change to core funding or a reduction in resources. Additionally, the ongoing serious challenge of non-competitive salaries and sector comparator disparities for the HRLSC's lawyers remains, making it difficult to recruit and retain experienced lawyers.

The HRLSC will continue to work with MAG to develop solutions that address salary inequities while also addressing and trying to avoid or mitigate the impacts upon staff and the number of full-time employees the HRLSC can sustain.

Maintaining and Sustaining Annual Increases

The HRLSC will be negotiating a new collective agreement with OPSEU, and it is anticipated that the pressure to provide significant salary increases will mount as the moderation period under *Bill 124* comes to an end in December 2021 for the HRLSC's unionized staff. The HRLSC is required to consult with Treasury Board Secretariat on any monetary and non-monetary bargaining mandate prior to the commencement of negotiation and before ratification.

Capital Assets

The HRLSC’s only significant capital asset is its IT systems, which are managed over a three or five-year amortization period. By staggering replacement and upgrade dates, the Centre ensures that the financial impact is spread over multiple years. In response to the pandemic, the HRLSC purchased additional IT equipment to support remote work arrangements. Further capital IT projects are planned to maximize efficiency gains and will be implemented based on available funding. Results will be evaluated for efficiency and service capacity gains.

Multi-Year Operating Budget

The variances outlined in the budget below are due to vacancies created by temporary medical or other staff leaves. Variances are monitored and managed throughout the year and human resources are realigned to ensure the most effective use of funds, with a priority of utilizing or realigning funds to support direct services and the HRLSC mandate.

Operating Budget

Expense Category	2021-22 Budget	2021-22 YE Forecast	Explanation of Variance	2022-23 Budget	2023-24 Budget	2024-25 Budget
Salaries and Wages (S&W)	3,734,867	3,715,350	Due to unexpected vacancies	3,728,157	3,821,710	3,917,734
Benefits	749,248	762,741	Benefits projected higher to support the proposed increases	780,897	800,543	820,708
ODOE	792,288	798,312		767,349	654,150	537,961
Board Expenses	59,797	59,797		59,797	59,797	59,797
TOTAL Operating	5,336,200	5,336,200		5,336,200	5,336,200	5,336,200

Revenue Budget

Expense Category	2021-22 Budget	2021-22 YE Forecast	Explanation of Variance	2022-23 Budget	2023-24 Budget	2024-25 Budget
Core Funding	5,336,200	5,336,200		5,336,200	5,336,200	5,336,200
TOTAL Revenue	5,336,200	5,336,200		5,336,200	5,336,200	5,336,200

Section 13: Performance Measures and Targets*

Performance Measure: Ontarians who believe they have experienced discrimination have access to human rights legal information and advice. This performance target is adjusted to reflect the impact of current trends in the HRLSC’s intake staff turnover.

Year	Performance Target* Intake calls answered:
2021-22	70%
2022-23	80%
2023-24	80%
2024-25	80%

Performance Measure: Increased and quick access to justice for Ontarians and increased efficiency and capacity in the human rights system through early resolution of human rights cases, reducing costs for applicants, respondents, and taxpayers. Future projections for this performance measure are dependent upon the retention of the HRLSC’s current compliment of full-time legal staff and may vary in response to unforeseen environmental factors.

Year	Performance Target* Cases resolved at mediation stage:
2021-22	66%
2022-23	70%
2023-24	70%
2024-25	75%

Performance Measure: Increased and quicker access to justice for Ontarians and increased efficiency and capacity in the human rights system by resolving cases at all stages of the application process, reducing costs for applicants, respondents, and taxpayers. This performance target has been introduced to best capture measurable outcomes for the HRLSC’s clients given the continued build-up of delayed cases at the HRTTO.

Year	Performance Target* Cases settled at any stage of the application process:
	<i>Performance Target implemented in 2022-23 planning period</i>
2022-23	250
2023-24	325
2024-25	400

Performance Measure: Increased and quicker access to justice for Ontarians and increased efficiency and capacity in the human rights system by resolving meritorious claims at the HRTO hearing without the need for full litigation, reducing costs for applicants, respondents, and taxpayers. As with projected performance targets for cases resolved at mediation, these settlement numbers will be based upon the retention or expansion of the HRLSC’s current legal counsel and may vary in response to unforeseen environmental factors.

Year	Performance Target* Cases settled at beginning of hearing:
2021-22	75%
2022-23	75%
2023-24	75%
2024-25	80%

Performance Measure: High quality legal services are provided to Ontarians who have experienced discrimination.

Year	Performance Target* Clients rate services as good/very good, at least:
2021-22	85%
2022-23	85%
2023-24	85%
2024-25	85%

Performance Measure: Ontarians are informed about discrimination, the human rights system and the HRLSC’s services.

Year	Performance Target* Obtain positive media coverage for stories of the HRLSC’s service, at least:
2021-22	10 stories
2022-23	15 stories
2023-24	20 stories
2024-25	20 stories

* Projections subject to the continuation of mediations and hearings. Procedural delays and fiscal constraints may affect performance.

Any return to normal operations at the HRTO would presumably include increased demand for the HRLSC’s services. At its current funding levels, the HRLSC would not be able to marshal the resources required to meet that influx in demand for its staff to support clients at hearings and related legal proceedings.