Kawartha Pine Ridge District School Board

# 2023-2024 COHREA Annual Report

January 2025

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## How do I access the COHREA Annual Report?

The COHREA Annual Report is available in any of the following ways:

- **Online to the public:** Go to **COHREA Annual Reports** on the KPR web page.
- **By email: cohrea@kprdsb.ca**.
- **By telephone:** Leave a voicemail at 705-742-9773 ext. 2023, and the COHREA will follow up with you.
- **This report can be made available in an alternate format upon request.**

## How do I provide feedback?

To provide feedback or send questions about any section of this Annual Report, please contact the Commissioner's Office of Human Rights, Equity and Accessibility (COHREA) at:

Kawartha Pine Ridge District School Board
Education Centre
1994 Fisher Drive
Peterborough, Ontario
K9J 6X6

Phone: 705-742-9773 ext. 2023
Email: **cohrea@kprdsb.ca**

**KPR**
Kawartha Pine Ridge
District School Board
**COHREA**

**COMMISSIONER'S OFFICE OF
HUMAN RIGHTS,
EQUITY & ACCESSIBILITY**

# 1.0 About the Commissioner's Office of Human Rights, Equity and Accessibility

## 1.1 COHREA's Mandate

At the Kawartha Pine Ridge District School Board (KPR), the Commissioner's Office of Human Rights, Equity and Accessibility (COHREA) entered its second full reporting period during the 2023-2024 Reporting Year. The Office expanded with the addition of the Human Rights, Equity and Accessibility Coordinator (HREA Coordinator) to support the Commissioner's mandate at KPR. Operating at an arms-length and semi-autonomous, the COHREA's oversight is anchored in insuring a transparent, accessible, and fair internal complaints process for assessing, reviewing, and investigating (when deemed necessary) on all matters alleging discrimination and harassment, including that which specifically falls under the protected grounds of Ontario's Human Rights Code (the Code). The COHREA's role encompasses an equity component that focuses primarily on the legal application of equity under the Code. This includes advising on the special programs[1] under the Code including obligations under the duty to accommodate. Aspects of educational equity specific to curriculum and social application of principles of equity remain the responsibility of the Superintendent of Education responsible for Equity, Diversity, and Inclusion (EDI). However, the COHREA works with EDI on certain system training and learning where there are connections between the Code and EDI principles, as applicable to public education. The COHREA also works with the Superintendent of Human Resources, People and Culture, on matters related to employment equity, including the application of Policy/Program Memorandum 165: School Board Teacher Hiring Practices (PPM 165).[2] Finally, the COHREA is tasked with overseeing KPR's accessibility obligations under the *Accessibility for Ontarians with Disabilities Act* (the AODA). This entails directing the process for fostering an educational culture that proactively challenges and addresses system-wide barriers adversely impacting the participation of persons with disabilities with the goal of prevention and removal.

## 1.2 Legal Compliance and Human Rights Education

At its core the COHREA exists to ensure legal compliance with the Code. The Code is the principal law in Ontario pertaining to anti-discrimination by recognizing the dignity and worth of every person. It gives legal direction in ensuring mutual respect for the dignity that is centred on protected rights so that opportunities are accorded free of discrimination and harassment. In mirroring the Code, the need for a clear, transparent, confidential and accessible internal complaints process was deemed vital to COHREA's mandate for ensuring an educational culture that is open to addressing complaints of discrimination and harassment at KPR. Additionally, the COHREA's work is anchored to KPR's stated mission of inspiring its students to excel in learning, succeed in life, and enrich the wider KPR community.

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[1] Special Programs under 14. (1) of the Code states: "A right under Part I is not infringed by the implementation of a special program designed to relieve hardship or economic disadvantage or to assist disadvantaged persons or groups to achieve or attempt to achieve equal opportunity or that is likely to contribute to the elimination of the infringement of rights under Part I. R.S.O. 1990, c. H.19, s. 14 (1)." Along with Section 14, some other sections in the Code allow preference to be given to specific groups if certain criteria are met. The special interest organization (section 18), special employment (section 24) and the age 65-and-over provisions (section 15) all lay out special exceptions or defences to the right to be free from discrimination under Part I of the Code.

[2] PPM 165 provides expectations for school board hiring policies to be developed by each school board; and proposes that school board hiring policies must be applied in compliance with the collective agreement and in accordance with any applicable laws including the Code.

The delivery of education is deemed a service under one of the social areas of the Code. Also, Ontario's Education Act makes clear that the overriding purpose of education is to provide students with the opportunity to realize their potential and develop into highly skilled, knowledgeable, and caring citizens who contribute to their society. It also sets out the criteria for creating an inclusive and accepting school environment in alignment with the spirit and intent of the Code for the purpose of assuring appropriate and meaningful access to education for all students. There is an implied expectation and assumption that school boards implement the Education Act in accordance with a firm commitment to Code obligations. Therefore, along with legal compliance, human rights education through ongoing system-wide training is a key driver of the COHREA's work in advancing human rights learning at KPR. This work centres on:

- a duty for senior leaders and educators who act in the role of duty-bearers to deliver educational/services to rights-holders who are principally students in a way that is non-discriminatory and consistent with the Code;
- a commitment to ongoing/proactive obligation under the Code to identify and redress discrimination experienced by staff, students and community members in their ongoing engagements at KPR; and,
- an invitation to design, when necessary, special programs that may, at times, be required for the purpose of addressing unintentional legacy discriminatory practices.

## 1.3    Human Rights Policy

COHREA operates under Board Policy B-3.3, Human Rights: Code-Based Discrimination and Harassment[3] and its associated Administrative Regulation B-3.3.1[4]. Cultivating and maintaining an educational culture free of discrimination and harassment is vital to actioning the guiding principles identified in KPR's Board Action Plan[5]. This entails the requirement of accountability by all members of the KPR community, along with an unwavering commitment to ensure a welcoming, inclusive, anti-discriminatory, and affirming educational environment. Toward meeting its legal obligations, an effective, equitable and accessible internal complaints process is paramount to addressing discrimination and/or harassment matters that are in violation of the Code. At KPR, the Report IT! confidential online tool serves this purpose.[6]

The overarching purpose of Board Policy B-3.3 is to set the process for identifying and addressing reported or known instances and/or incidents of Code-based discrimination and/or harassment and to act promptly, fairly, judiciously and with due regard to confidentiality for all parties concerned. Board Policy B-3.3 consists of seven sections that outline and define all relevant details of the Code as it relates to KPR. It includes an overview of the five social areas and definitions of the seventeen protected grounds addressed by the Code.[7]

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[3] Board **Policy B-3.3**, Human Rights Code-Based Discrimination and Harassment.

[4] Administrative **Regulation B-3.3.1**, Human Rights-Code-Based Discrimination and Harassment.

[5] The three (3) Guiding Principles of the **Board Action Plan** are Learning Matters, Belonging atter and Relationship Matters

[6] **Report IT!** is available to all members of the KPR community to bring forward a concern to be addressed that may (or may not have) have Code implications.

[7] For example, the Code grants every person with a right to equal treatment with respect to services, goods and facilities without discrimination based on race (i.e., common descent or external features such as skin colour, hair texture, facial characteristics), gender identity (i.e., a person's conscious sense of maleness and/or femaleness, separate and distinct from biological sex), or sexual orientation (includes lesbian, gay, bisexual, heterosexual, two-spirited, questioning, etc.).

## 1.4  Governing Principles

The COHREA is committed to its five governing principles: Respect, Accessibility, Confidentiality, Impartiality and Non-Interference which specifically guide its work regarding complaints management.

The following details how each principle is actioned by the COHREA:



a)  **Respect:** Treating people with respect is paramount to approaching all issues from a human rights lens which means that the dignity and worth of everyone permeates all actions. This entails being intentional, reviewing carefully, thoughtfully and with impartiality to eliminate pre-judgement or even bias. Respect and dignity are two different, but closely related concepts. The actions of the COHREA are aligned with the Universal Declaration of Human Rights (proclaimed in 1948) and articulated in the Preamble of the Human Rights Code. It emphasizes a fundamental principle that the idea of human rights is premised on the "…recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family and is the foundation of freedom, justice, and peace in the world."[8]

b)  **Accessibility:** Accessibility is premised on confronting and removing barriers that are usually systemic in nature and often based on culturally framed attitudes and perceptions. Barriers to access are conditions or obstacles that prevent individuals (such as those with disabilities) from accessing knowledge and resources specific to the COHREA's complaints processes and in receipt of human rights education and training. Barrier removal is about access to COHREA dispute resolution processes, including early resolutions and investigations. The Human Rights-Based Approach (HRBA) to accessibility is based on acknowledging structural inequities that exist in our system that require action in order to provide full and fair access for persons with disabilities learning and working at KPR.

c)  **Confidentiality:** All dealings with the COHREA are deemed private and confidential. Confidentiality is important to ensure that members of the KPR community can discuss concerns without fear of repercussions, and this confidentiality is protected in both the Code and KPR's corresponding Board Policy B-3.3. At the discretion of the HREA Commissioner, exceptions to confidentiality may occur where there is a risk of harm to a party. Written consent from a complainant is usually required before the COHREA will discuss a matter with anyone else.

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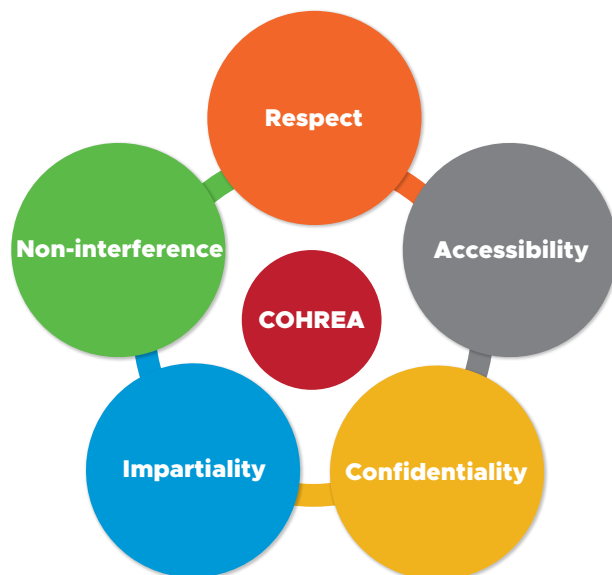
[8] The **Universal Declaration of Human Rights** is also identified in the Preamble if the Code itself.

**d)** **Impartiality:** Being relatively independent of the board's formal administrative structure ensures that matters brought to the attention of the COHREA are dealt with without any preconceived opinion. This means that the COHREA engages in an objective review of all facts and circumstances, since its role is to neither act as an advocate for individuals, nor as a defender of the board itself, but rather to always ensure procedural fairness.

**e)** **Non-Interference:** While the COHREA reports to the Director of Education, regarding complaint's management, it operates independently and without interference and/or influence from the Director's Office. This ensures matters are not prejudiced in any assessment or investigation and engenders trust and confidence by the wider KPR community.

## 1.4    COHREA's Alignment with the Board Action Plan

The COHREA's goals are aligned with the Board Action Plan (BAP) where learning, belonging and relationships matter in fulfilling the goals of supporting staff and students through ensuring that excelling in learning, succeeding in life and enriching communities are linked, interpreted and delivered through a human rights lens. The interconnectivity of the COHREA's mandate of fostering human rights, equity, and accessibility with the three pillars of the Board Action Plan is premised on the achievement, well-being and success for all. It is an implicit statement for duty-bearers to understand their role in addressing the concerns of rights-holders at all times.



Students' Unique Strengths and Skills

Holistic Approaches to Indigenous Knowledge and Focus on Truth and Reconciliation

Social Responsibility and Social-Emotional Learning

WE VALUE: Achievement, Well-Being and Success for All

Service Excellence and Accountability

Collaboration with Families, Partners and Communities

Equity, Diversity and Inclusion

## 1.5    Organizational Structure

While the COHREA is accorded relative autonomy and independence, specifically in regard to reviewing and investigating Code-based complaint matters, the HREA Commissioner reports to the Director of Education. Confidential consultations, complaint files and matters that are subject to or under investigation and review are not discussed between the HREA Commissioner and Director of Education.

# 2.0 Human Rights, Equity and Accessibility Case Management

## 2.1 Role of Report IT!

The Report IT! confidential online (Report IT!) tool was first introduced to KPR system-wide during the 2022-2023 Reporting Year. Developed in-house and in collaboration with KPR's Information and Communications Technology Department, it was officially launched June 2022. The key objective of Report IT! is to provide a safe, confidential, voluntary, and transparent online reporting tool for members of the wider KPR community[9] to bring forward issues/concerns, including discrimination and harassment, bullying, threats, targeting and intimidation, failure to accommodate, and other related concerns negatively affecting them. The Report IT! confidential online reporting tool is available for any member of the wider KPR community and is fully accessible on the KPR website any time during the calendar year. Complaint matters brought forward are not limited to issues that are solely identified by the person making the submission as a breach of the Code and Board Policy B-3.3. Following intake and during the review and assessment process, a determination is usually made on where the matter should ultimately reside and which KPR policy is likely applicable for addressing the issue(s) identified in the initial Report IT! submission.

## 2.2 Handover, Referrals and Consultations

The COHREA approach to complaint matters is with the understanding that not everyone making a Report IT! submission may always be comfortable reporting incidents of discrimination and harassment, either directly to their supervisor or senior administrator, or to the school administration (in the case of students and parents). With written consent, information supplied by a complainant is forwarded to the appropriate Family of Schools Superintendent (FOS-SO), if deemed necessary, following the review and assessment. In the case of school-based issues, they would go to the appropriate FOS-SO. This is the standard process for complaints arising from schools which allows the relevant FOS-SO the first opportunity to look at options for early intervention and resolution since they would already have important and established preexisting relationships with school administration and the community at large.

The process of officially forwarding a file to the FOS-SO is referred to as a handover. This allows the relevant FOS-SO to manage the file and then take appropriate action following their own review of the Report IT! file. However, there may be some instances in which the relevant FOS-SO is not able to successfully resolve the complaint because they have determined that a decision involves a complex human rights issue with potential legal implications for the board. In such circumstances, upon receiving consent from the complaining party, the relevant FOS-SO may suspend their review and send the matter back to the COHREA for its review and to conduct its own investigation. The return of a complaint to COHREA is known as an official referral. Alternatively, a complainant may not be satisfied

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[9] The "wider KPR community" encompasses, staff, students, parents, volunteers, trustees and other persons who have a relationship with KPR.

with the outcome of a handover and can choose, on their own, to engage with the COHREA for additional discussion, provided that the issue in question is deemed to be Code-based discrimination and harassment and falling within one or more of the protected grounds. Unlike the case with school-based matters, a confidential consultation usually takes place with a KPR staff member before any determination is made to proceed with a handover to either the Union (if applicable) and/or the Labour Relations team within Human Resource Services.

While it is preferred that individuals submit issues/concerns using the Report IT! confidential online reporting tool for the purpose of accurate tracking and record-keeping, it is not mandatory. It is equally understood that various situations may sometimes be complex, multi-tiered and not necessarily clear to someone on how best to proceed and thus making it difficult to decide whether one should make a Report IT! submission online. In such instances, the COHREA staff may opt to engage in a brief consultation to support the individual in their decision on whether they wish to proceed with making a Report IT! submission.

## 2.3  Report IT! Classifications

When reviewing and assessing issues following the intake process, the COHREA employs a standardized set of classifications to identify the types of issues and concerns received through the Report IT! submissions. Each Report IT! submission is reviewed individually by the COHREA staff, and, based on the information provided or obtained through further fact-finding, a classification is assigned at the conclusion of the intake and assessment process. This classification is determined solely on the information supplied in the initial Report IT! submission, responses to additional clarifying questions sent to the complainant (if applicable), and any other evidence shared by the complainant during the fact-finding process.

The standard set of classifications used during the 2023-2024 Reporting Year include:

- Accessibility barrier
- Bullying
- Code-based complaint (one of 17 grounds)
- Disciplinary action
- Duty to Accommodate
- Hate incident
- Human rights violation
- Non-Code based complaint
- Poisoned environment
- Reprisal
- Service complaint
- Sexual harassment
- Targeting
- Workplace misconduct
- N/A (Not applicable)

The Not Applicable (N/A) classification is applied to Report IT! submissions that do not fit neatly into the standard classifications. In such instances, after careful review, the COHREA uses a comprehensive sub-set of classifications for any submission under a broad N/A classification to provide additional explanation. These sub-classifications include:

- N/A – Anonymous (party not identified)
- N/A – Bad faith submission
- N/A – Community-based issue
- N/A – Complainant follow through
- N/A – Duplicate Report
- N/A – Incorrect reporting tool
- N/A – Missing or incorrect information
- N/A – Other (does not fit N/A sub-classifications)
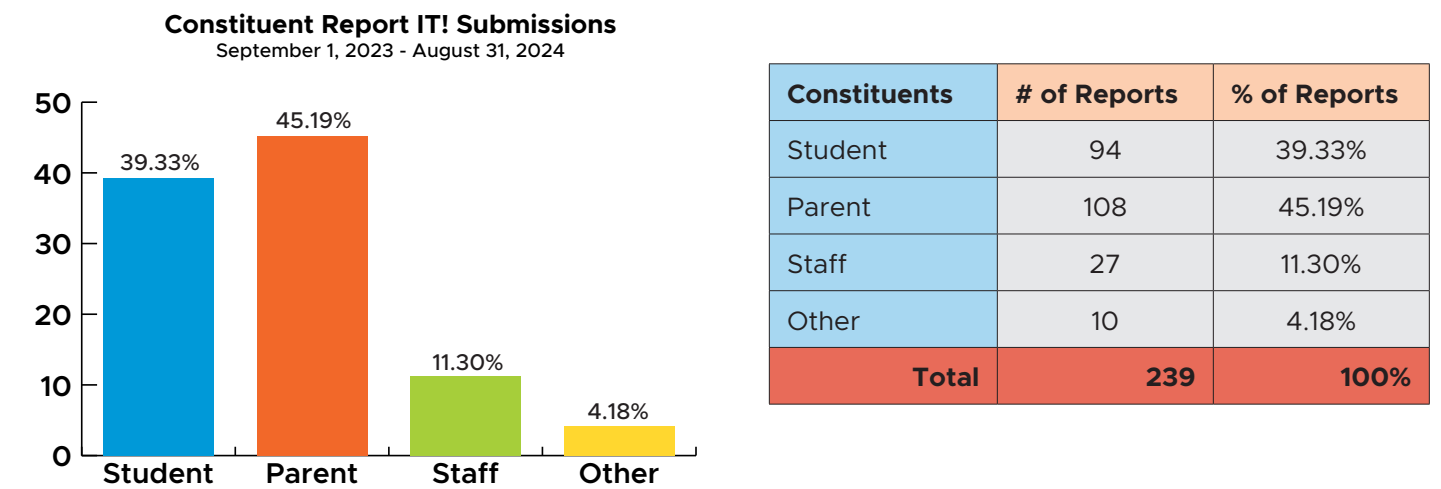- N/A – Out of Scope
- N/A – Resolved locally

## 2.4 Report IT! Data Review and Analysis (September 1, 2023 – August 31, 2024)

This section reviews data collected from the second full year of service and covers the period starting on September 1, 2023 and ending on August. 31, 2024. It essentially serves as a snapshot in time of all complaint matters on file that fall within this timeframe.

It is important to make clear that the presented data should be viewed and interpreted as issues/concerns in which parties have made their own designation of the matter in bringing a concern forward via utilization of Report IT!. It is not based on a COHREA determination that discrimination or harassment has been designated and/or proven with a finding of fault on the part of the party (board unit) to which the complaint is directed.

### Constituent Report IT! Submissions

During the 2023-2024 Reporting Year, the COHREA received a total of 239 submissions. Of those, a majority came from parties identifying as a parent of a KPR student at 108 (or 45.91%). Those who submitted and identified as a student stood at 94 (or 39.33%). When combined, parents and students made up 84.52% of the total submissions for the 2023-2024 Reporting Year. Staff submissions were at 27 (11.30%), whereas other constituents were at 10 (4.18%) which came from community members.

**Constituent Report IT! Submissions**
September 1, 2023 - August 31, 2024

| Constituents | # of Reports | % of Reports |
|---|---|---|
| Student | 94 | 39.33% |
| Parent | 108 | 45.19% |
| Staff | 27 | 11.30% |
| Other | 10 | 4.18% |
| **Total** | **239** | **100%** |

Students as the service end user of the KPR system are deemed "rights-holders" while parents, by having a direct interest in their child's education, also act as "right-holders" by extension as a result of their advocacy role for the overall learning needs and well-being of their children. Together, they are the largest group served by the COHREA through Report IT! submissions. The COHREA received a higher proportion of submissions from these two groups compared to other groups, including staff and others during the 2023-2024 Reporting Year.

### Report IT! Submission Classifications

Each Report IT! submission is assigned two classifications internally: the first classification is assigned to reflect the most accurate and/or appropriate labels for the issue(s)/concerns(s) as identified by the person making the submission. A second is assigned to reflect on what happened once the report has been reviewed and assessed. It is important to note that there is a distinct difference in how the information is entered into Report IT! by adults (i.e., parents, staff, etc.) versus students that assist the COHREA with assigning classifications.

**What best describes your reason for making this report** *

**Date of alleged incident/issue** *

yyyy-mm-dd 📅

**Description of where (location) incident occurred** *

**Please provide a brief summary of your issue/concerns**

Anyone submitting a report who self-identified as a Parent, Staff, or Other constituent are required to use a series of text boxes to enter information detailing their issue(s)/concern(s) (see screenshot above). Their reports are then assigned the appropriate classifications based on keywords or phrases the individual used in their report submission to describe their issue(s)/concern(s). For example, using keywords such as bullying, racist or anti-LGBT slurs, or harassment by another student would be classified as bullying. Similarly applicable would be issues with KPR staff not following Individual Education Plans (IEP) or issues on adherence to educational/workplace accommodations that have been granted would be classified as duty to accommodate.

**The issue/concerns I am reporting on involves** *
(please check all that apply)

☐ Accident/Injury ☐ Alcohol/Drugs/Cannabis ☐ Assault/Abuse
☐ Bullying/Cyber Bullying ☐ Complaint about board/school/staff ☐ Conflict
☐ Discrimination/Hate ☐ Harassment ☐ Privacy Breach
☐ Sex Trafficking ☐ Smoking/Vaping on premises ☐ Theft/Lost Item
☐ Vandalism ☐ Violence ☐ Weapons
☐ Other (Not Listed)

Students are the only constituents who have the option to self-select classifications (see above screenshot) that best describe their concerns, while also having the option to enter more information in text boxes to provide more context for their selections. This flexibility was deemed necessary to meet the vast differences in abilities and needs between students at different ages and stages of growth and development. When processing internally, classifications for students are assigned based on:

- the categories selected by the student, or
- keywords/phrases used in their report when no categories were pre-selected, or
- when the categories selected by the student do not align with the additional text entered in their report.

| Classification | # of Classifications | % of Classifications |
|---|---|---|
| Bullying | 105 | 28.93% |
| N/A | 150 | 41.32% |
| Non-Code Based Complaint | 42 | 11.57% |
| Service Complaint | 26 | 7.16% |
| Other | 40 | 11.02% |
| **Total** | **363** | **100%** |

### Report IT! Submission Classifications
September 1, 2023 - August 31, 2024



Legend: Bullying, N/A, Non-Code Based Complaint, Service Complaint, Other
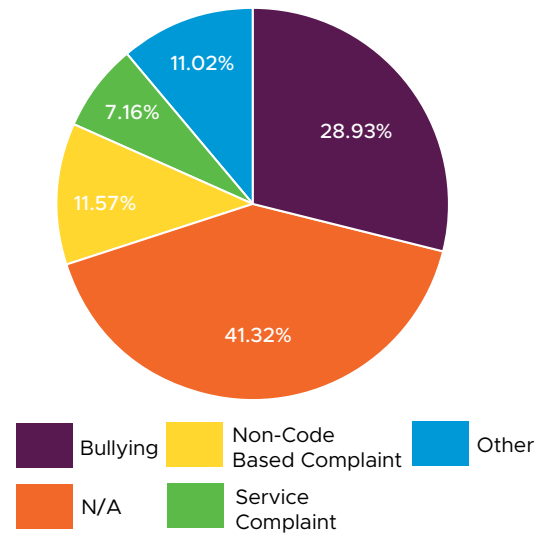
The classification "N/A" was utilized for the highest number of report submissions at 150 (or 41.32%). This is followed by the use of Bullying, Non-Code Based Complaint and Service Complaint classifications, with Bullying at 105 (or 28.93%), Non-Code Based Complaint at 42 (or 11.57%), and Service Complaint at 26 (or 7.16%). Collectively, these accounted for 88.98% of all classifications utilized for report submissions during the 2023-2024 Reporting Year.

Bullying was the biggest issue reported, with incidents occurring on school property, on the school bus, online, and at times extended to the community.

Non-Code based complaints mainly consisted of school-based issues not connected to one of the 17 protected Code grounds (e.g., sex, race, creed, sexual orientation, gender identity, etc.) that were thought to have caused harm to the complainant or others at the school. For example, reports of vandalism, students vaping in washrooms, students misbehaving in hallways/washrooms, older students negatively influencing younger students, etc.

Service Complaints consisted of a range of issues with KPR sites, for example, an overflowing dumpster and general cleanliness of the property, washroom access/cleanliness, heating and cooling issues, etc. Service complaints also included procedural issues, for example, staff teaching methods and approaches to discipline, school catchment and enrollment at preferred schools, safety of bus pickup/drop off locations, field trip cancellations, child custody and access challenges at school, etc.

All classifications used less than 10 times were included under the Other classification. There were 40 (or 11.02%) classifications that fell under Accessibility Barrier, Code Based Complaint, Disciplinary Action, Duty to Accommodate, Hate Incident, Poisoned Environment, Sexual Harassment, Targeting, and Workplace Misconduct.

| N/A Sub-Classifications | # of N/A Sub-Classifications | % of N/A Sub-Classifications |
|---|---|---|
| N/A – Bad Faith Submission | 5 | 3.33% |
| N/A – Complainant Follow Through | 86 | 57.33% |
| N/A – Missing/Incorrect Info | 7 | 4.67% |
| N/A – Out of Scope | 12 | 8.00% |
| N/A – Resolved Locally | 5 | 3.33% |
| Other | 35 | 23.33% |
| **Total** | **150** | **100%** |

**Report IT! N/A Sub-Classifications**
September 1, 2023 - August 31, 2024



Legend:
- N/A – Bad Faith Submission
- N/A – Complainant Follow Through
- N/A – Missing/Incorrect Info
- N/A – Out of Scope
- N/A – Resolved Locally
- Other
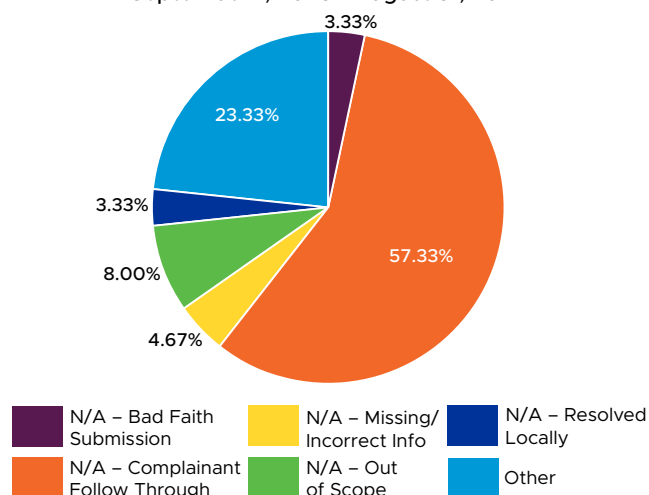
The 150 submissions classified as N/A have been further broken down into sub-classifications. There were 86 (or 57.33%) reports sub-classified for Complainant Follow Through, accounting for two-thirds of the sub-classifications used during the 2023-2024 Reporting Year.

Complainant Follow Through was used for several scenarios that lead to the file being closed:

- after submitting the report, the individual did not respond to any follow up communications from COHREA staff; or
- after follow up by COHREA staff, the individual chose to discontinue with the complaints process; or
- after answering follow up questions from COHREA staff and reflecting on the steps they had taken, they chose to go back to the other party to resolve things on their own; or
- the individual submitted a report only for the purpose of having their issue(s)/concern(s) recorded and stored confidentially in the event that things came up again.

There were 12 (or 8.00%) reports sub-classified as Out of Scope which was used for cases with labour-related issues or concerns that were best addressed with their local bargaining unit and Human Resources. With the individual's written consent, Out of Scope reports of this nature were handed over to the appropriate area of the board for follow up (e.g., their Union or the Labour Relations Team). Out of Scope was also used to classify reports detailing issues or concerns that were community-based, or based on personal or political beliefs, and so did not fall under the COHREA's mandate or jurisdiction to address. In these cases, individuals were advised as such and recommendations were provided on the most appropriate area of the board (or the broader education system) to table their concerns.

There were 7 (or 4.67%) reports sub-classified as Missing/Incorrect Information. This was used for reports that did not include enough information for COHREA staff to assess the identified issue(s)/concern(s), and the individual did not respond to follow up by COHREA staff. This sub-classification was also used for reports in which the individual entered an incorrect email address, preventing COHREA staff from following up.

The sub-classifications Resolved Locally and Bad Faith accounted for 5 (or 3.33%) report submissions each. Resolved locally was used for reports that were submitted in the heat of the moment, but in following up it was learned that the identified issue(s)/concern(s) were already being addressed by the necessary parties (e.g., the classroom teacher, school administration, etc.). Bad Faith reports were all submitted by students reporting a false or made-up issue about another student. In all cases, a school administrator, employee, or parent contacted the COHREA to inform that the report was false and that they were already working with the student to understand the purpose of Report IT!.

For the purpose of this report, the sub-classifications Anonymous, Duplicate Report, and Incorrect Reporting Tool were included under Other.

## 2.5   Report IT! Monthly Data Review and Analysis

This section considers monthly trends from September 1, 2023 to August 31, 2024.

Parents continued to be early adopters in the system for utilizing the Report IT! tool. Reporting trends were spread throughout the 2023-2024 Reporting Year with a higher volume of report submissions from parents that were sustained during the first half of the school year, including 12 in October, peaking in November at 15, 10 in December, and 13 in January. During the second term, report submissions rose to their highest of the year in April with 17 report submissions, and then drastically decreased to the end of



**Constituent Report IT! Submissions by Month**
September 1, 2023 - August 31, 2024
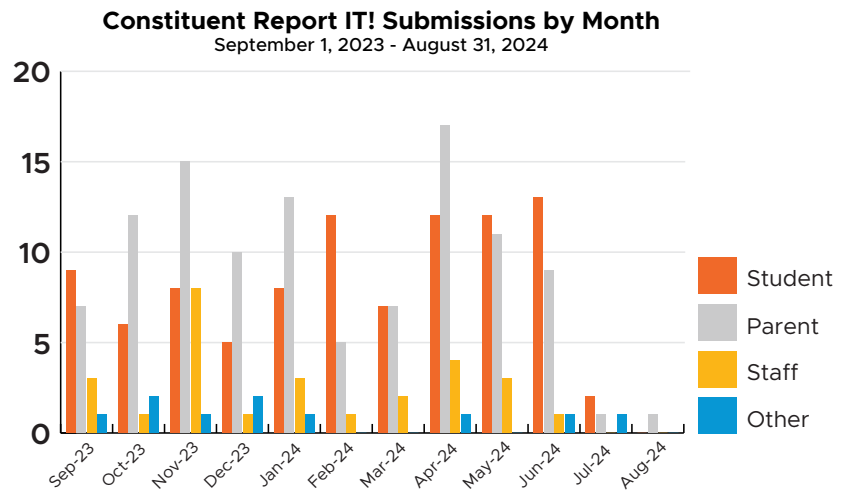
the Reporting Year. Report submissions from students were consistent throughout the school year with reports hovering between 5 and 9 submissions per month between September and January. Student report submissions were at their highest in February, April and May at 12 each, peaking at 13 reports received in June. Reporting in February was higher due to a student submitting three times and a group of students reporting on each other. April was higher due to three reports that were submitted anonymously that appeared to be from the same individual.

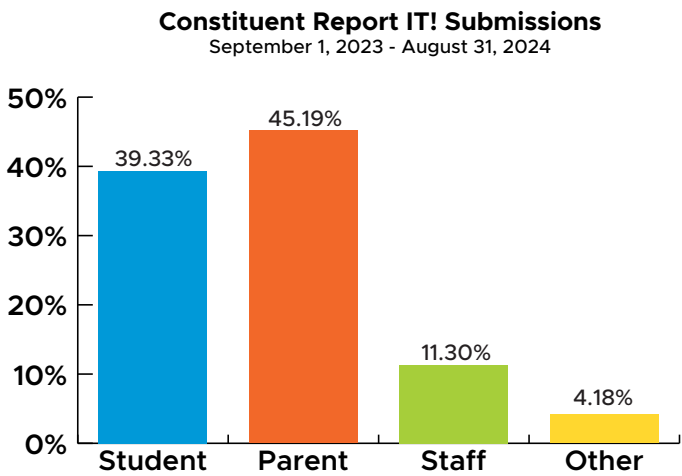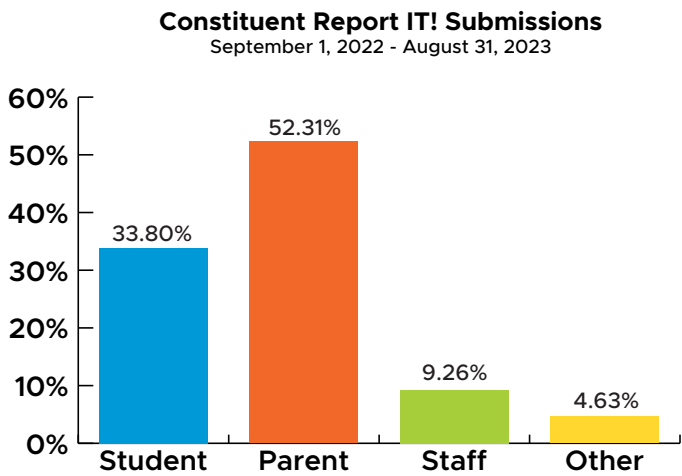Submissions by parents were mostly made to address an issue (e.g., academic, social or service oriented) that they became aware of through their child, by the school, or for an issue that spanned multiple years that had not been effectively addressed. Reporting submissions by students typically revolved around social issues such as bullying whether by other students or staff at school, on the school bus, online or in the community.

Total report submissions for the 2023-2024 Reporting Year show consistent use of Report IT! throughout the school year. The most significant month-over-month trend shows a reporting cycle that builds up to November, dissipates until March before sharply rising in April, then dropping off into the summer months. This trend is consistent with the elementary report card schedule in which progress reports are sent out between October and November, first report cards are sent out between January and February, and then final report cards are sent out in June.

**Total Report IT! Submissions by Month**
September 1, 2023 - August 31, 2024
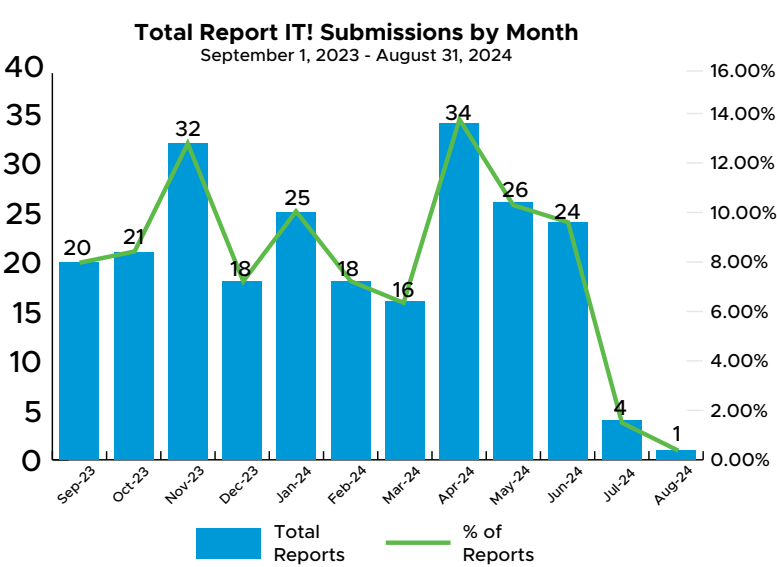


## 2.6  Comparative Data Review and Analysis with 2022-2023 Reporting Period

This section considers trends between the current Reporting Year and the 2022-2023 Reporting Year.

**Constituent Report IT! Submissions**
September 1, 2022 - August 31, 2023



**Constituent Report IT! Submissions**
September 1, 2023 - August 31, 2024



The COHREA received over double the number of report submissions compared to the previous Reporting Year. In both reporting years, Parents (followed by Students) continued to submit most reports compared to Staff and Other constituents. Parents submitted 7.12% less reports at 45.19% down from 52.31%, while there was a 5.53% increase from Students at 39.33%, up from 33.80% in the previous Reporting Year. There was a small increase of 2.04% from Staff at 11.30% up from 9.26%, and a nominal decrease for Other constituents at 4.18% down from 4.63%, a difference of 0.45%. There is not enough evidence to explain the decrease from Parents or Staff however, we can attribute the increase in reporting from Students to having increased awareness of the Report IT! tool.

## Report IT! Submission Classifications
### September 1, 2022 - August 31, 2023
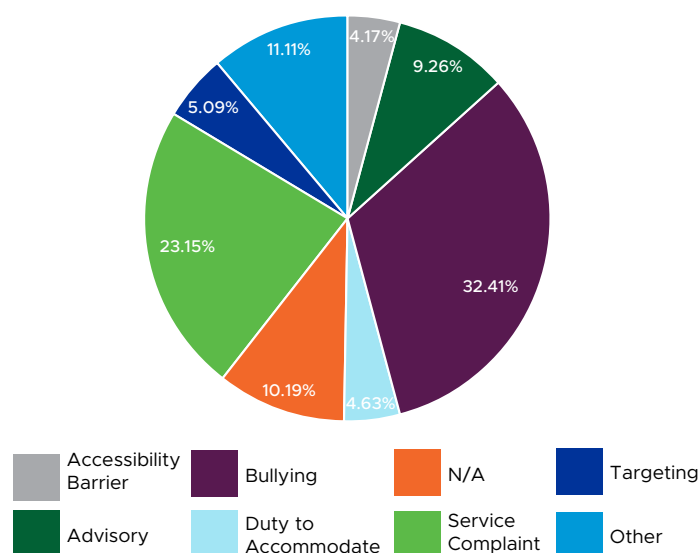


| | | | |
|---|---|---|---|
| ■ Accessibility Barrier | ■ Bullying | ■ N/A | ■ Targeting |
| ■ Advisory | ■ Duty to Accommodate | ■ Service Complaint | ■ Other |

## Report IT! Submission Classifications
### September 1, 2023 - August 31, 2024



| | | |
|---|---|---|
| ■ Bullying | ■ Non-Code Based Complaint | ■ Other |
| ■ N/A | ■ Service Complaint | |

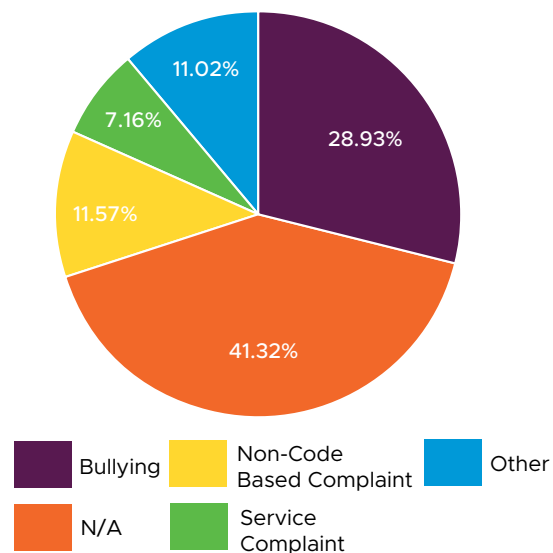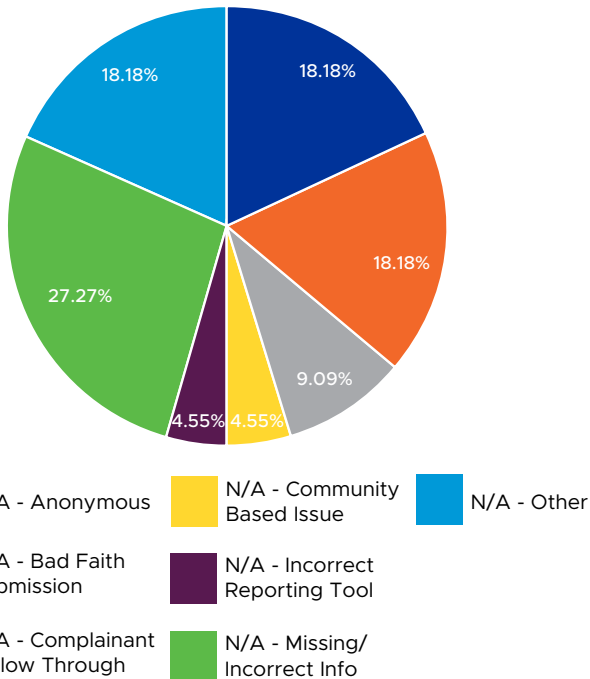Report IT! submission classifications varied, primarily as a consequence of the issues that lead people to report are often highly subjective and situational. Thus, additional years of data is required in order to properly analyze meaningful trends year-over-year. During the 2023-2024 Reporting Year, the bulk of reports were spread over fewer classifications. This is in part due to a more refined understanding (among COHREA staff) of the nature and substance of reports in relation to the education system and the Code. There was a sizeable increase in the N/A classifications used given the increase in reports submitted to the COHREA doubled compared to the previous Reporting Year. Bullying continues to be the top issue accounting for a quarter of submissions decreasing from about a third of the submissions from last Reporting Year. Non-Code Based Complaint was more prominent this Reporting Year, while Accessibility Barrier, Duty to Accommodate and Targeting were less-so compared to the previous Reporting Year. Note that Advisory is no longer included and tracked as a classification connected to Report IT!. Moving forward, Advisory are referred to as Consultations that are tracked as a separate and distinct activity of the COHREA. Consultations are discussed in greater detail later in section 2.7 of this report.

The bulk of N/A sub-classifications fell under Complainant Follow Through or Other for this Reporting Year. Complainant Follow Through can be partially attributed to a shorter turnaround for complainants to respond during the 2023-2024 Reporting Year. During the previous 2022-2023 Reporting Year, complainants were typically permitted one week to respond to any communications from COHREA staff. This included answering follow-up questions, responding to a reminder email, providing consent to complete a handover, etc. This sometimes resulted in a longer, more drawn-out complaints process, allowing for issues to build while awaiting intervention (e.g., official handover to an FOS-SO, commencing
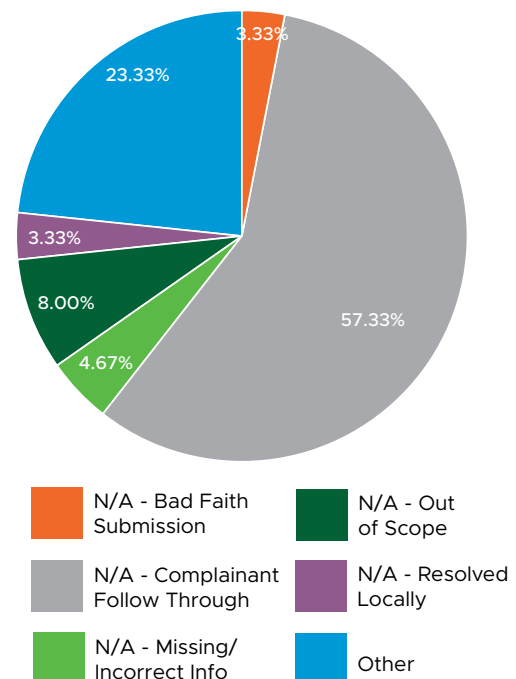
**Report IT! N/A Sub-Classifications**
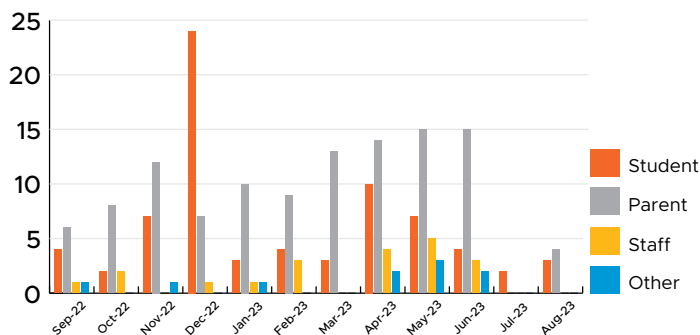September 1, 2022 - August 31, 2023



- N/A - Anonymous — 18.18%
- N/A - Bad Faith Submission — 18.18%
- N/A - Complainant Follow Through — 9.09%
- N/A - Community Based Issue — 4.55%
- N/A - Incorrect Reporting Tool — 4.55%
- N/A - Missing/Incorrect Info — 27.27%
- N/A - Other — 18.18%

**Report IT! N/A Sub-Classifications**
September 1, 2023 - August 31, 2024



- N/A - Bad Faith Submission — 3.33%
- N/A - Complainant Follow Through — 57.33%
- N/A - Missing/Incorrect Info — 4.67%
- N/A - Out of Scope — 8.00%
- N/A - Resolved Locally — 3.33%
- Other — 23.33%

an investigation, etc.). COHREA staff sped up the process significantly during the 2023-2024 Reporting Year by giving two to three business days for complainants to reply to communications at any stage of the process. In some instances, this has resulted in reports being resolved, redirected, investigated, and/or handed over to the appropriate system leader(s) more efficiently. This has also contributed to the increase in reports being closed due to a lack of response (i.e., follow-through) from the complainant.

There is not enough data from the (previous) 2022-2023 Reporting Year to derive trends that could be considered generalizable or applicable across the system into the 2023-2024 Reporting Year. However, it provides a baseline measure for us to begin analyzing and comparing the data year-over-year. Report IT! submissions were distributed more evenly between Parents and Students during the 2023-2024 Reporting Year compared to the previous Reporting Year in which reports were more often submitted by Parents. Report IT! submissions by Parents follow a similar trend throughout the school year, building up to progress and mid-term reports in November and April. Student reports were more evenly distributed at consistently moderate levels throughout the first half of the school year and built up to higher levels during the latter half. Staff reporting trends are beginning to emerge in the 2023-2024 school year, most notably with higher levels in November 2023. More data for staff is needed to understand any trends associated with staff reports.

**Constituent Report IT! Submissions by Month**
September 1, 2022 - August 31, 2023



Legend: Student, Parent, Staff, Other

**Constituent Report IT! Submissions by Month**
September 1, 2023 - August 31, 2024



Legend: Student, Parent, Staff, Other
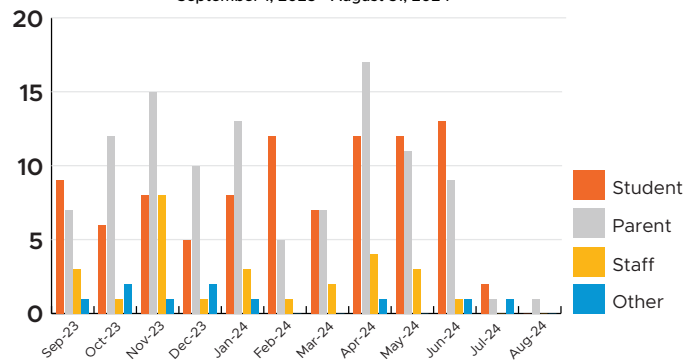
Report submissions for the 2023-2024 Reporting Year follow a similar pattern to the 2022-2023 Reporting Year with some minor differences. Most reports were submitted during the school year between September and June that once again show a build-up alongside key points in the year.

**Total Report IT! Submissions by Month**
June 1, 2022 - August 31, 2023



Legend: Total Reports, % of Reports

**Total Report IT! Submissions by Month**
September 1, 2023 - August 31, 2024



Legend: Total Reports, % of Reports
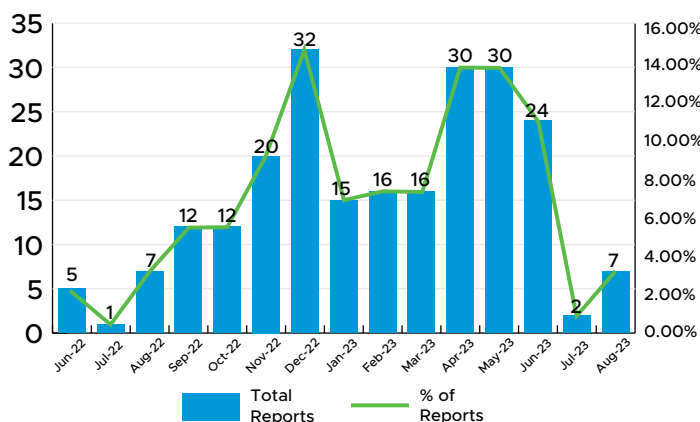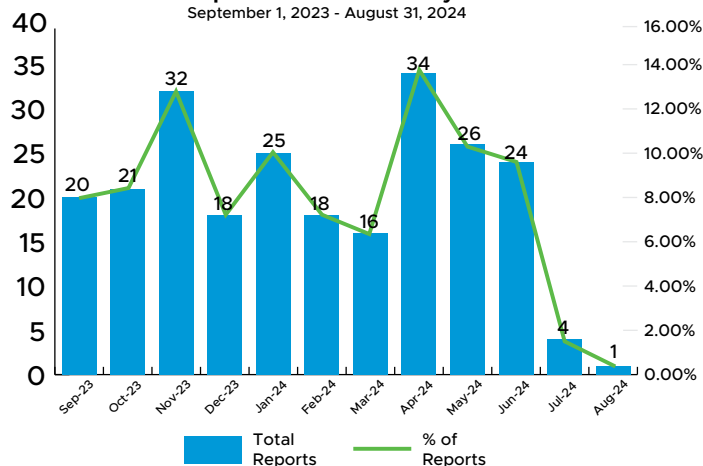
During the 2022-2023 school year, there was a clear build up/reduction cycle that peaks in December then again in April. The build-up/reduction cycle still occurs during the 2023-2024 school year. However, it is less pronounced as a higher number of reports were received in general and more consistently month-over-month. As the COHREA continues to collect Report IT! data, trends will become more visible and inform the COHREA's activities at KPR.

## 2.7  Constituent Consultations

In addition to Report IT! submissions, the COHREA receives direct requests for consultations with KPR constituents. Consultations are confidential conversations about emerging or ongoing human rights-related issues/concerns brought to the COHREA's attention for immediate review and recommendations. Consistent with the COHREA's mandate, consultation-related activities serve an important function with a dual purpose:

- supporting KPR constituents in navigating and/or de-escalating emerging or ongoing human rights issues/concerns in real-time; and
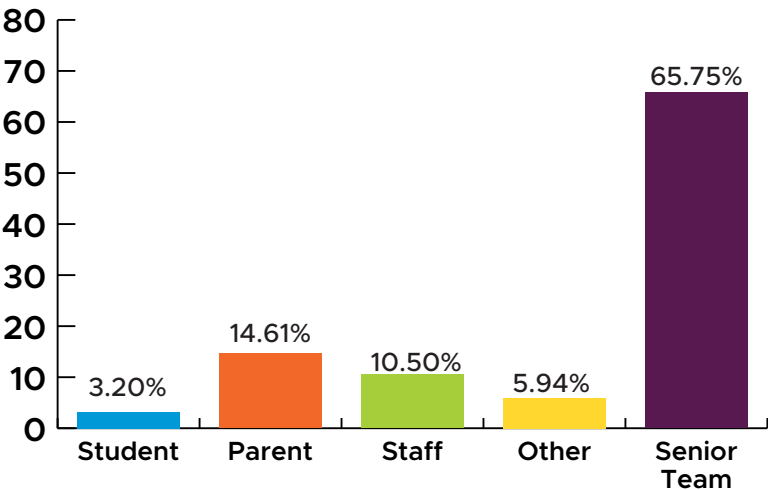- building human rights, employment equity and accessibility knowledge, literacy and capacity across the system.

**Constituent Consultations**
September 1, 2023 - August 31, 2024

| Constituents | # of Consults | % of Consults |
|---|---|---|
| Student | 7 | 3.20% |
| Parent | 32 | 14.61% |
| Staff | 23 | 10.50% |
| Other | 13 | 5.94% |
| Senior Team | 144 | 65.75% |
| **Total** | **219** | **100.00%** |

During the 2023-2024 Reporting Year, the COHREA engaged in a total of 219 consultations with KPR constituents. The majority occurred with KPR senior team members at 144, representing 65.75% of all consultations followed by Parents at 32 (or 14.61%), then Staff at 23 (or 10.50%), Other at 13 (or 5.94%), and Students at 7 (or 3.20%).

In most cases, consultations with parents, students, or those falling under other constituents mirrored issues/concerns formally received through Report IT!. Communications were always grounded in the Human Rights-Based Approach and centred on navigating early resolution or preventing escalation of issues/concerns experienced by rights-holders. Staff consultations also focused on de-escalation and/or resolution but with the added task of balancing their role as duty-bearers (i.e., an employee with human rights responsibilities and obligations) and their position as rights holders (i.e., an employee) in relation to KPR itself.

Confidential consultations with senior team members and the HREA Commissioner occurred through individual meetings. The purpose of these meetings were to review and provide guidance for addressing various complaint matters relating to one or more of the protected grounds in the Code, or for an issue of discrimination and harassment in which someone made the allegation of a failure to accommodate. In all instances, any advisory was premised on seeking every opportunity for early resolution and potential opportunities for restorative outcomes consistent with the remedial and non-punitive nature and objective of the Code.

## 2.8    Early Resolutions and Formal Investigation

Early resolution is a process that may take place, with the mutual consent of parties, prior to or even during a formal investigation. For this to happen, it does require relevant parties involved to consent to the COHREA's facilitative and restorative approach and at the earliest possible stage in the complaint. The COHREA offers multiple forms of early resolution, including informal dialogue, mediation, or conducting a site-based review to facilitate a mutually agreeable resolution.

The conciliation process only takes place after a formal investigation is completed (but before a determination is made) and when the parties involved have an idea whether the allegations are substantiated. Findings are made clear through a post-investigation interview by the HREA Commissioner. It is intended as a final, last-minute opportunity to empower the parties to come to a resolution so that they are able to move beyond the conflict. At the reconciliation itself, the parties are expected to negotiate in good faith, to treat each other with respect, and to keep all discussions confidential. It is essentially the final opportunity for the parties to bring closure to the matter and entails individual conversations with the HREA Commissioner about the situation and all options for exploring mutually agreeable solutions. The conciliation process is the final opportunity for resolution agreement without release of the Investigation Report. Thus, if there is no agreement or settlement, the Investigation Report is sent to the Director of Education for review and possible referral to the Superintendent of Human Resources, in the case of staff, for appropriate action.

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│  The Canadian Charter of Rights and Freedoms │
│        (The Constitution Act of Canada)       │
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                      ↓
┌─────────────────────────────────────────────┐
│            Ontario Human Rights Code          │
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│              The Education Act                │
└─────────────────────────────────────────────┘
        ↓              ↓                 ↓
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│ Education Act │ │ Policy/Program│ │    KPRDSB    │
│  Regulations  │ │   Memoranda   │ │Board Policies│
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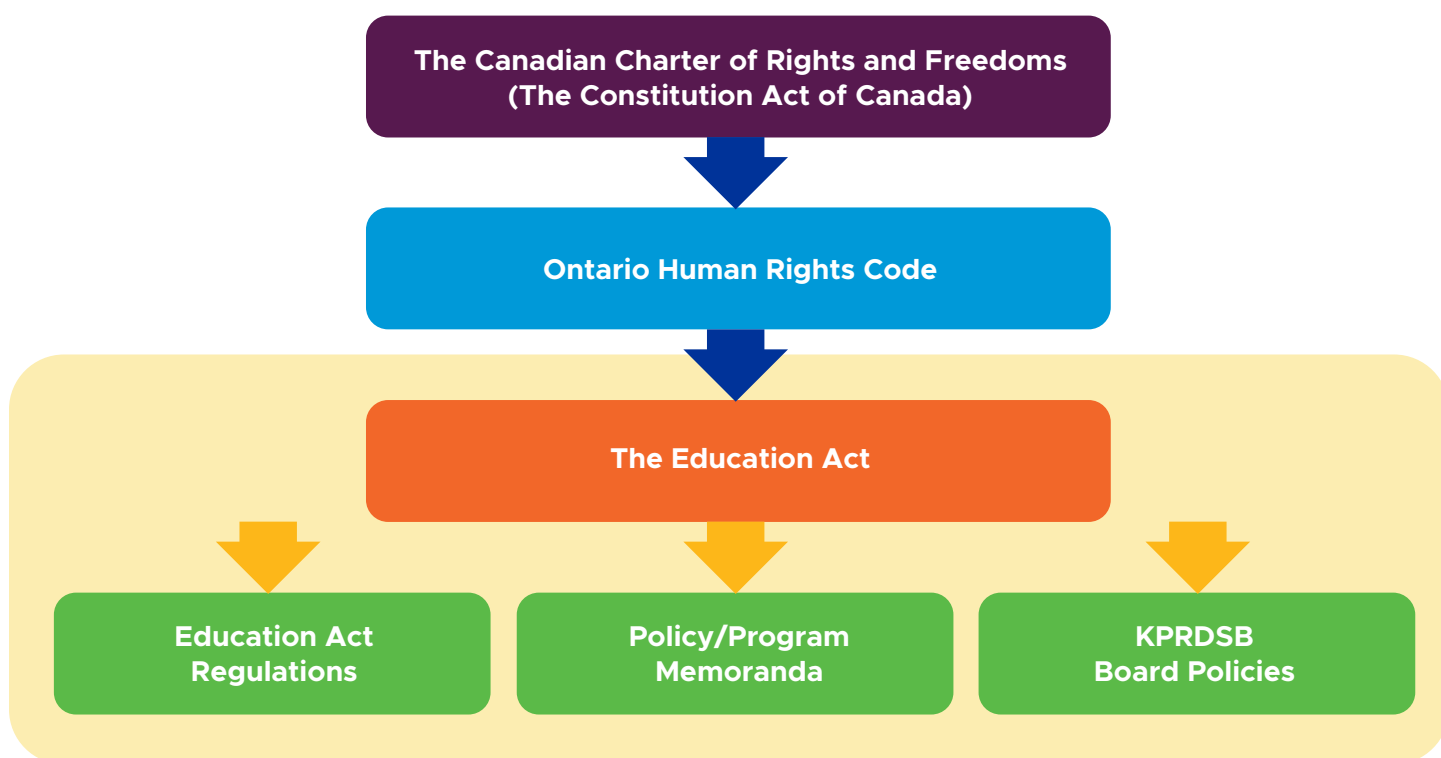
# 4.0 Human Rights Education and Engagement

## 4.1 Senior Management

Ongoing human rights education was provided to KPR's senior team through individual confidential consultations (see section 2.7), and through several formal engagements and training presentations that took place during the 2023-2024 Reporting Year. This included the development of the Report IT! 5-Step Process Guide and subsequent presentation to the Senior Team in February 2024. The COHREA also developed a comprehensive Internal Investigations Guide (IIG) for senior team members. The IIG was officially launched during a senior team strategic planning day in May 2024, via a presentation giving an overview of the guide followed by a facilitated workshop using the IIG with a scenario.

## 4.2 Principals and Vice-principals

During the 2023-2024 Reporting Year, ongoing human rights education was provided to principals and vice-principals through consultation and guidance for addressing various complaints matters in connection to the protected Code grounds and duty to accommodate.

## 4.3 Unions

Engagement with union presidents took place primarily through advisory processes and where union participation occurred through representation as accompanying persons to human rights complaint consultations.

## 4.4 Board Staff

Throughout the 2023-2024 Reporting Year, there were ongoing advisory services provided to the Labour Relations team in Human Resource Services specifically regarding questions relating to the Code. The COHREA delivered presentations on the Report IT! 5-Step Process Guide to multiple teams or employee groups, including the Labour Relations team (Oct. 2023), ALG Managers (Nov. 2023), the Indigenous Education Advisory Council (Feb. 2024), and Executive Assistants (May 2024).

## 4.6 Other Constituents

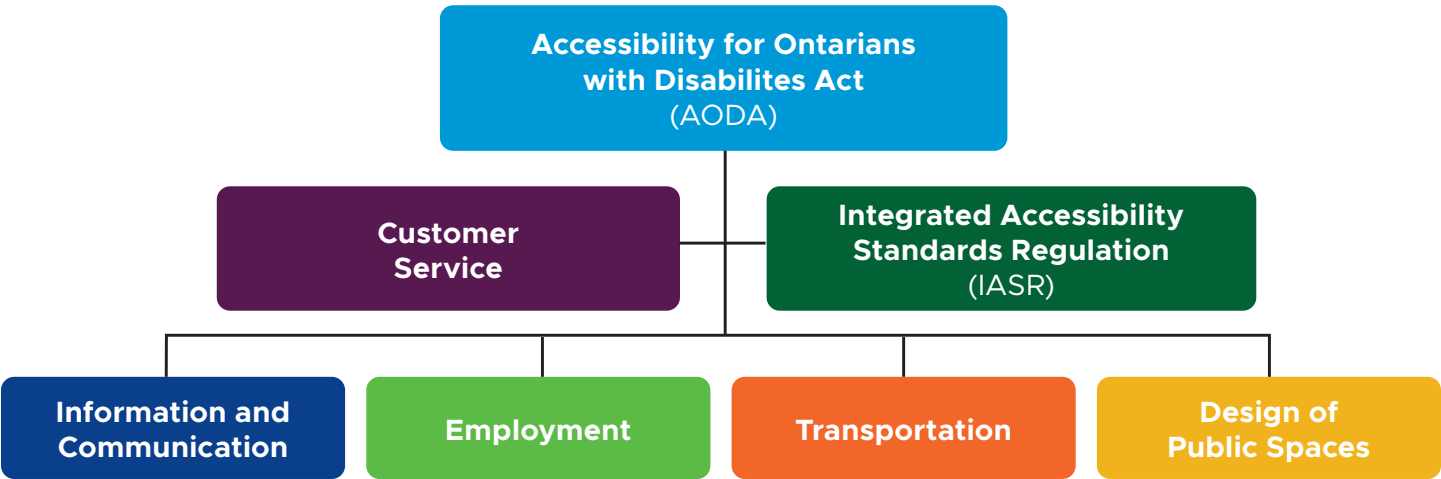During the 2023-2024 Reporting Year, ongoing advisory was provided to KPR constituents related to human rights and the Report IT! process, including parents, students and community through their engagement with the COHREA. In February 2024, the HREA Commissioner, at the request of the Clarington School Council Association, delivered a presentation focusing on human rights and the Report IT! process.

# 5.0 Accessibility

## 5.1 Accessibility Policy

Board Policy B-3.4, Accessibility for Persons with Disabilities, establishes the framework for the Board's compliance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (IASR). This policy underscores the Board's commitment to actively removing barriers and enhancing accessibility and participation for all members of the KPR community. KPR is particularly dedicated to accessibility and addressing barriers faced by persons with disabilities, recognizing the importance of learning, belonging, and relationships in public education. Excellence in education is rooted in respect for the dignity and humanity of all individuals and is based on developing human potential by equipping individuals and groups with the necessary tools and skills to fully contribute to a diverse society. KPR's commitment to a barrier-free working and learning culture requires fostering fair, nurturing, positive, and respectful environments for all board community members. Addressing various aspects of ableism is central to this ongoing work and the board's commitment to human rights.

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                    ┌─────────────────────────────┐
                    │ Accessibility for Ontarians │
                    │    with Disabilites Act     │
                    │           (AODA)            │
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        │   Customer Service    │   │   Integrated Accessibility  │
        │                       │   │    Standards Regulation     │
        │                       │   │           (IASR)            │
        └───────────────────────┘   └─────────────────────────────┘
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   │ Information   │ │ Employment │ │ Transportation │ │ Design of    │
   │ and          │ │            │ │                │ │ Public Spaces│
   │ Communication│ │            │ │                │ │              │
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The policy includes relevant information on KPR's compliance with the AODA and the Board's commitment to ensuring decision-making in areas covered by the AODA Standards. It provides a clear direction that inclusive culture at KPR is one in which barriers to accessibility for persons with disabilities (architectural/structural, attitudinal/social, information or communications, physical, systemic, policy or practice and technological) are identified and removed.

## 5.2 Accessibility Advisory Committee

The Accessibility Advisory Committee (AAC) was created and launched during the 2022-2023 Reporting Year and entered its first year of quarterly meetings. The committee, comprising 21 members from various board constituencies, is dedicated to promoting an inclusive approach to accessibility as outlined in Board Policy B-3.4. Their primary focus is to ensure the board adheres to the Accessibility for Ontarians with Disabilities Act

(AODA) requirements. This includes providing leadership, conducting reviews, and offering recommendations to different constituencies and departments on AODA compliance. Engagement with the AAC is done using a collaborative approach with the main goal of identifying and eliminating barriers in the service, work and learning environments for all students, staff, volunteers and other relevant stakeholders toward recommending systemic changes.

The AAC consists of seven AODA subcommittees/working groups constituting specialized units tasked with implementing the Board's AODA accessibility plan. They report to and act under the general direction of the AAC and include the following:

- Built Environment and Planning Services Subcommittee (BEP)
- Student Services Subcommittee (SSS)
- Human Resources Subcommittee (HRS)
- Curriculum (Library Services) Working Group (CWG)
- Communications and IT Subcommittee (CITS)
- Accessibility Policy Review Subcommittee (APRS) – ad hoc.
- Transportation Working Group (TWG)

The AAC met quarterly during the school year in September 2023, November 2023, February 2024 and May 2024 and engaged in a variety of learning activities. Each meeting featured an accessibility inclusion learning exercise facilitated by the COHREA, focusing on supporting students with disabilities. A guest speaker with relevant expertise presented on specific accessibility-related topics and engaged with AAC members through a question-and-answer session. Additionally, relevant readings were sometimes included to supplement discussions and learning, emphasizing key principles of universal design in education. The following provides a breakdown of activities and learning that occurred during the quarterly AAC meetings during the 2023-2024 Reporting Year:

**September 2023**
- Reading: KPR Accessibility System Survey Data (PowerPoint).
- Accessibility Inclusion Exercise: in breakout groups, discussed either accessibility in public education or social determinants that impact persons with disabilities. Completed with a report back and larger group discussions.
- Guest Speaker: Mark Buffone (Accessibility Compliance Specialist, City of Peterborough) provided a comprehensive discussion about accessibility and public consultation/engagement work in the city[10]. Opportunity for questions and answers followed the presentation.

**November 2023**
- Accessibility Inclusion Exercise: in breakout groups, discussed a recommendation from the K-12 Education Standards Development Committee from the perspective of their role and department at KPR. Completed with a report back and larger group discussions.
- Guest Speakers: John McNutt (Executive Director) and Jason King (Program Assistant), Peterborough Council for Persons with Disabilities (PCPD)[11]. They provided a comprehensive presentation about the work of PCPD, the importance of education in

reducing barriers to persons with disabilities, and a suite of programming they have on offer for the K-12 education system. Opportunity for questions and answers followed the presentation.

**February 2024**
- Reading: K-12 Education Standards Development Committee Initial Recommendations Report[12], and Draft KPR Multi-Year Accessibility Plan.
- Accessibility Inclusion Exercise: in breakout groups, reviewed one of three key recommendations from the K-12 Education Standards followed by the guest speaker.
- Guest Speaker: Lynn Ziraldo, former Chair of the K-12 Education Standards Development Committee[13] provided a comprehensive presentation regarding the role and work of the K-12 Education Standards Development Committee and the final recommendations report[14]. Opportunity for questions and answers followed the presentation.

**May 2024**
- Reading: Equal Access: Universal Design of Instruction (article)
- Accessibility Inclusion Exercise: in breakout groups, reviewed a case study and discussed assigned questions taking principles of Universal Design into consideration. Completed with a report back and larger group discussions
- No guest speaker. AAC members had the opportunity to provide general feedback about AAC committee activities and learning to support planning for 2024-2025 AAC meetings.

During the 2023-2024 Reporting Year, the AAC was instrumental in assisting with the development of key projects including the Multi-year Accessibility Plan (MYAP) and the Accessibility 101 online training module.

## 5.3   Multi-year Accessibility Plan (MYAP) 2023-2027[15]

During the 2023-2024 Reporting Year, the COHREA, in collaboration with the AAC and its supporting subcommittees, developed KPR's first comprehensive Multi-Year Accessibility Plan (MYAP) for 2023-2027 in alignment with KPR's Strategic Plan 2023-2026. Completing the MYAP is a pivotal step to ensuring KPR is meeting its compliance obligations under the AODA. The new MYAP was informed by several key activities, including consultations with senior management through Department Self-Audits, and a comprehensive environmental scan of MYAPs (July-August 2023). The environmental scan reviewed the MYAPs of five other boards (Toronto District School Board, York Region District School Board, Durham District School Board, Halton District School Board, and Peel District School Board). The scan considered what areas/topics were included, pros and cons (e.g., organization, length, use of visuals, charts, etc.), and unique features to inform the development of KPR's new MYAP. The environment scan process was also completed with the six subcommittee leads from the KPR Accessibility Advisory Committee with each reviewing one of the example MYAPs from other school boards.

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[10]City of Peterborough **accessibility**.

[11]Peterborough Council for Persons with Disabilities (**PCPD**).

[12]K-12 Education Standards Development Committee – **2021 initial recommendations report**.

[13]K-12 Education Standards Development Committee **website**

[14]K-12 Education Standards Development Committee – **2022 final recommendations report**.

[15]KPR MYAP 2023-2027 - **standard version** and **accessible version**.

KPR's new MYAP 2023-2027 was approved by KPR's Board of Trustees to move forward with its introduction and implementation to the system of KPR during the 2024-2025 Reporting Year.

## 5.4   Accessibility 101 Online Training Module

During the 2023-2024 Reporting Year, the COHREA worked extensively on the development and completion of a KPR-specific online training module for all existing and new staff titled, Accessibility 101. The module was informed by feedback from KPR staff garnered from a comprehensive accessibility system survey (June 2023), and consultations with senior management through the completion of department self-audits (July-August 2023). The process of developing the training module required COHREA staff to engage in several important steps, including:

- Developing a comprehensive script vetted in collaboration with the communications team;
- Hiring a production company to support the COHREA with bringing the script to life;
- Completing script readings with select staff at the Education Centre;
- Coordinating with the production company, teams within the Education Centre and several schools in the municipality of Clarington on several photo shoots to obtain KPR-specific accessibility content;
- Reviewing and suggesting edits for the production company;
- Engaging with IT Services and Human Resources to begin the plan for uploading the completed product to KPR Learns; and
- Reviewing a "trailer" of the training module with the AAC and senior teams

The Accessibility 101 online training module was fully completed by the end of the 2023-2024 reporting year with the work of uploading the content to KPR Learns, setting up completion tracking and officially launching to the system carrying over into the next Reporting Year.

## 5.5   Compliance with the Accessibility for Ontarians with Disabilities Act (AODA)

The above accessibility-related projects are key to fostering an educational culture that proactively challenges and addresses system-wide barriers adversely impacting the participation of persons with disabilities with the goal of prevention and removal. These activities are important for ensuring compliance under the AODA.

In July 2024, the COHREA received a formal email from the AODA Compliance Unit of the Ministry of Seniors and Accessibility informing that KPR had been selected for an AODA desk audit. The desk audit required the COHREA to provide information regarding KPR's commitment and compliance to the ADOA, and specifically related to the Integrated Accessibility Regulations Standard (IASR). As of the end of the reporting year there were additional requests that followed and carried over into the 2024-2025 Reporting Year.