



Kawartha Pine Ridge District School Board

Commissioner's Office of Human Rights, Equity and Accessibility (COHREA)

Annual Report 2022-2023

A report on the ongoing work of the Commissioner's Office of Human Rights, Equity and Accessibility (COHREA) in addressing human rights complaints and supporting working and learning environments that are free of discrimination and harassment.

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.
- **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:

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COMMISSIONER'S OFFICE OF
HUMAN RIGHTS,
EQUITY & ACCESSIBILITY

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

1.1 Creation of the COHREA

At KPR, the Commissioner's Office of Human Rights, Equity and Accessibility (COHREA) came into existence in the spring of 2022, with the hiring of the Human Rights Equity and Accessibility Commissioner (HREA Commissioner). Its oversight was anchored to a transparent, accessible, and fair internal complaints process for assessing, reviewing, and investigating (when necessary) matters of discrimination and harassment that fall under the protected grounds in the Ontario Human Rights Code (the Code). The role also includes an equity component that focuses on the legal application of equity under the Code, specifically regarding the special provision, as well as obligations that fall under the duty to accommodate. The equity component does not include specific aspects of educational equity that fall under the mandate of the Superintendent of Education responsible for Equity, Diversity and Inclusion (EDI). The COHREA's role was structured to ensure engagement and ongoing collaboration with the Superintendent of Human Resources, People and Culture for ensuring compliance with Policy/Program Memorandum 165: School Board Teacher Hiring Practices. Finally, complaint obligations under the Accessibility for Ontarians with Disabilities Act (AODA) and fostering a culture to address and remove barriers that adversely impact participation of persons with disabilities was assigned to fall within the COHREA.

1.2 Legal Compliance and Human Rights Education

An important component to the COHREA is to ensure legal compliance with the Code. At its core, the Code is a legal statement that sets out recognition of the dignity and worth of every person. The Code is guided by mutual respect for the dignity that is centred on protected rights so that opportunities are accorded without discrimination and in accordance with law. The creation of a transparent and accessible internal complaints process was deemed necessary to COHREA's mandate for ensuring a culture free of discrimination and harassment, and aligned with KPR's mission of inspiring its students to excel in learning, succeed in life, and enrich the communities it serves.

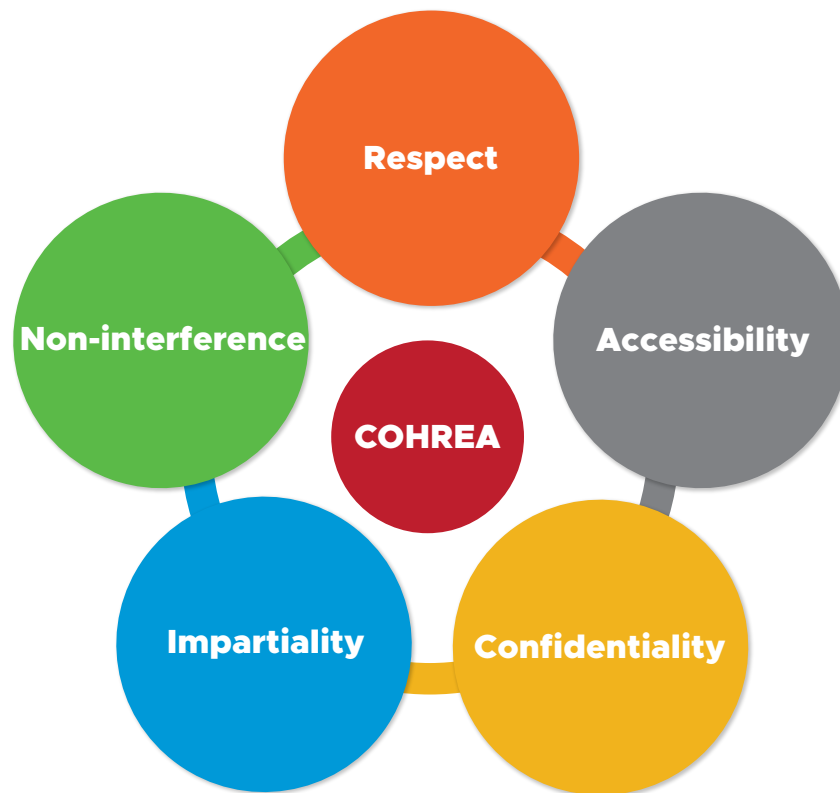
Code-based complaints at KPR often fall with the social areas of employment or services under the Code. The delivery of education is deemed a service under the Code. Ontario's Education Act makes clear that the overriding purpose of education is to provide students with the opportunity to realize their 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 accordance with the Code for the purposes 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.

The COHREA's work in advancing human rights learning centres on:

- a duty to deliver educational services without constructive discrimination,
- a commitment to ongoing/proactive obligation under the Code to identify and redress discrimination, and
- an invitation to design, when necessary, special programs to eradicate discrimination.

1.3 Governing Principles

Shortly after the establishment of the office and prior to the commencement of the 2022-2023 Reporting Year, the COHREA set out the five governing principles of Respect, Accessibility, Confidentiality, Impartiality and Non-Interference to guide its work especially in regard to case management.



- a) **Respect:** Treating people with respect is paramount to approaching all issues from a human rights lens in which the dignity and worth of everyone permeates all actions. This means being mindful of any sign of disrespect that could be perceived or received as an indication of a lack of objectivity and impartiality, possible pre-judgement or even bias. Respect and dignity are two different, but closely related concepts. The actions of the COHREA are aligned with the Preamble to the Universal Declaration of Human Rights (proclaimed in 1948) which emphasizes the importance of recognizing the inherent dignity of an individual in the following terms:

"...recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice, and peace in the world."

- b) **Accessibility:** Accessibility is premised on confronting and removing barriers. 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 to the full extent of the law. 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 the individual who made the Report IT! submission) is always required before the COHREA will discuss a matter or share any information about a matter with any other board unit.
- 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 impartiality. This means that the COHREA engages in an objective review of all facts and circumstances, and it acts neither as an advocate for individuals, nor as a defender of the board, but rather as a seeker of procedural fairness and reasonable outcomes.
- e) **Non-Interference:** While the COHREA reports to the Director of Education, the role 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 in promoting and encouraging respect for human rights without distinction as to social areas and protected characteristic under the Code.

1.4 Alignment with Board Action Plan

The COHREA's goals are aligned with the Board Action Plan (BAP) goals to support staff and students through a commitment to ensure that excelling in learning, succeeding in life and enriching communities are linked and interpreted through a human rights lens.

The following chart demonstrates the interconnectivity of the COHREA's mandate of fostering human rights, equity, and accessibility with the three pillars of the Board Action Plan:

STRATEGIC PILLARS	HUMAN RIGHTS	EQUITY	ACCESSIBILITY
Excel in Learning	Recognition of the inherent dignity and worth of every learner based on human rights principles.	Many different pathways to achievement and excelling in common learning aspirations and objectives.	Understanding that barriers, actual and perceived, can often inhibit participation and excellence.
Succeed in Life	Acknowledging the importance of intentionally confronting discrimination and harassment that create societal barriers toward succeeding in life.	The journey of life success is informed by multiple identities and meanings attached to them.	Understanding that succeeding is often less about motivation and more about points of access.
Enrich Communities	Fostering diverse communities based on respect for human rights for all.	Communities are stronger when people are brought together celebrating differences.	Stereotypes and implicit biases adversely impact open and welcoming community engagement.

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 reporting tool was introduced to KPR system-wide several months prior to the start of the 2022-2023 Reporting Year. It was developed in-house in collaboration with the Information and Communications Technology Department and was launched starting in June 2022. It intended to serve as a confidential, voluntary, and transparent online reporting tool for reporting issues/concerns, including discrimination and harassment, bullying, threats, targeting and intimidation, failure to accommodate, and other issues negatively affecting staff and student well-being. The Report IT! confidential online reporting tool is available for anyone intersecting with the KPR community, including staff, students, parents, trustees, third-party contractors, volunteers, etc., and is fully accessible via the KPR website any time during the calendar year.

2.2 Handover, Referrals and Consultations

The COHREA recognizes that not everyone within the KPR community may feel comfortable reporting discrimination and harassment directly to their supervisor or senior administrator, or to the school administration (in the case of students and parents). With consent, the information provided by a complainant is first forwarded to the appropriate administrator with jurisdiction to act. This is the process for complaints arising from schools which allows the relevant superintendent an opportunity to look at options for early intervention and resolution.

The process of officially forwarding a file to the relevant superintendent is referred to as a handover process. This allows the relevant superintendent to assume custody and take appropriate action following their review. However, there may be instances in which the relevant superintendent is not able to successfully resolve the issues because they have made the decision that it is a complex human rights issue with potentially serious legal implications for the board. In such circumstances, upon receiving consent from the complaining party, the relevant superintendent may send the matter back to the COHREA for review and investigation. The sending back process is known as the referral process. Alternatively, a complainant may not be satisfied 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.

It is preferred that individuals submit issues/concerns using the Report IT! confidential online reporting tool for consideration. However, it is equally understood that various situations may sometimes be complex, multi-tiered and not necessarily clear, thus making it difficult to decide whether one should make a submission online. In such instances, the COHREA staff are always available to conduct a brief consultation to support the individual in making a clear and informed decision on whether it is beneficial to proceed with making a Report IT! submission.

2.3 Report IT! Classifications

When reviewing and assessing issues following the intake process, the COHREA uses a standard set of classifications to identify the types of issues/concerns received through the Report IT! confidential online reporting tool. In all instances, every report submission is reviewed individually and, based on the information supplied or acquired through further fact-finding, each are given a classification at the conclusion of the intake and assessment process. A classification is determined based on the information supplied in the initial Report IT! submission, answers to additional clarifying questions sent to the complainant (if applicable), and any other evidence shared by the complainant in correspondences during further fact-finding. The standard set of classifications used include:

- Bullying
- Accessibility barrier
- Advisory
- Code-based complaint (one or more of 17 grounds identified)
- Consultation
- Disciplinary action
- Duty to Accommodate
- Hate incident
- Handover (immediate forward to SO on school-based matter)
- Human rights violation
- Investigation
- Non-Code complaint (workplace harassment)
- Official referral (sent back to COHREA by an SO)
- Poisoned environment
- Reprisal
- Sexual harassment
- Service complaint\Targeting
- Workplace misconduct
- Not applicable (N/A)

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 that falls under the 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 – Board policy/procedure issue
- N/A – Collective Agreement/Union issue
- N/A – Community-based issue
- N/A – Complainant follow through
- N/A – Conflation of human rights and EDI
- N/A – Equity-based issue
- N/A – Ideologically-based issue
- N/A – Incorrect reporting tool
- N/A – Missing or incorrect information
- N/A – Misunderstanding or clarification of human rights
- N/A – Other (doesn't neatly fit the above categories)
- N/A – Politically-based issue
- Self-advocacy (complainant directed to follow up with school administration directly)

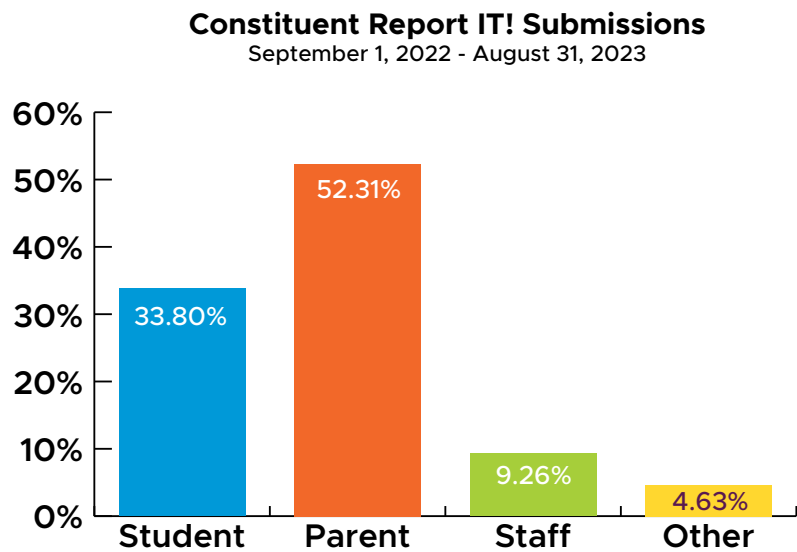
2.4 Report IT! Data Review and Analysis (Sept 1, 2022 - August 31, 2023)

The Report IT! tool officially launched at the start of the 2022-2023 Reporting Period. This section reviews data collected from that point to August 31, 2023, representing the first full year of service delivered by the COHREA to the system of KPR.

It is important to recognize that the data should be viewed and interpreted as issues/ concerns in which parties made their own determination to bring awareness by utilizing the Report IT! confidential online reporting tool. It is not an indication or finding of fault on the part of KPR staff members.

Constituent Report IT! Submissions

The COHREA received a total of 216 submissions during this reporting period. A majority came from those identifying as a Parent at 113 (or 52.31%) and Student at 73 (or 33.80%), together comprising 86.11% of the total submissions for the 2022-2023 Reporting Year. Staff submissions were at 20 (9.26%) while Other were at 10 (4.63%) which primarily came from community members.



Students as rights-holders are the service end user of the KPR system while parents as duty-bearers advocate for the overall well-being and learning needs of their children. Together, they represent the largest group served in the system. Naturally, we would expect to see a higher proportion of submissions being made by these groups relative to other groups represented in the system.

Constituents	# of Reports	% of Reports
Student	73	33.80%
Parent	113	52.31%
Staff	20	9.26%
Other	10	4.63%
Total	216	100%

Report IT! Submission Classifications

Each Report IT! submission is assigned a classification internally to reflect the most accurate and/or appropriate label based on the information shared by the constituent in their submission.

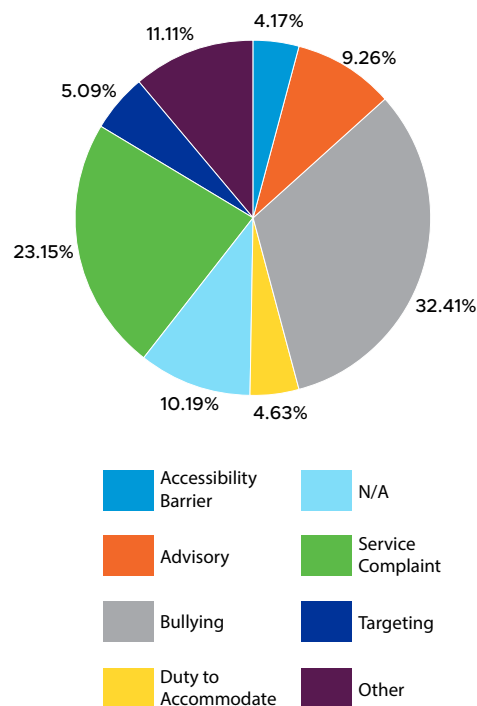
Classification	# of Reports	% of Reports
Accessibility Barrier	9	4.17%
Advisory	20	9.26%
Bullying	70	32.41%
Duty to Accommodate	10	4.63%
N/A	22	10.19%
Service Complaint	50	23.15%
Targeting	11	5.09%
Other	24	11.11%
Total	216	100%

Bullying and Service Complaint had the highest number of submissions by a large margin compared to other classifications. Bullying came in at 70 (or 32.41%) and Service Complaint had 50 (23.15%), together comprising over half (55.56%) of all submissions for the 2022-2023 Reporting Year. N/A had 22 (10.19%) of submissions (see below for a breakdown of sub-classifications), followed by Advisory with 20 (9.26%), Targeting with 11 (5.09%), Duty to Accommodate with 10 (4.63%) and accessibility barrier with 9 (4.17%). There were 24 (11.11%) submissions that fell under Other, which included Disciplinary Action, Hate Incident, Human Rights Violations, Poisoned Environment, Sexual Harassment, and Workplace Misconduct.

A breakdown of the 22 submissions classified as N/A, broken down into their respective sub-classifications is provided here.

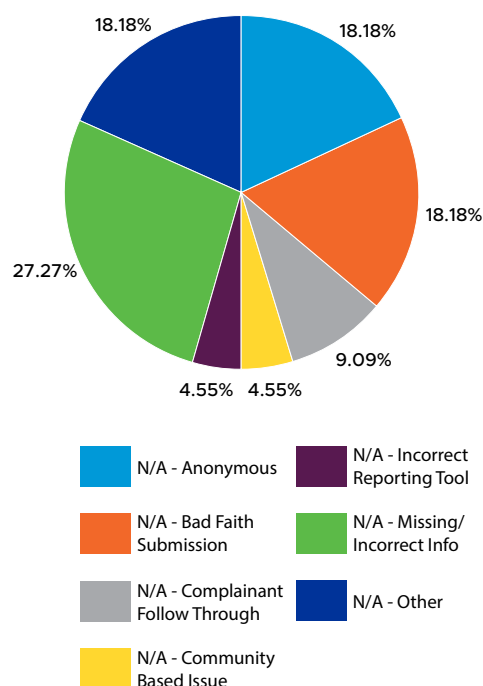
Report IT! Submission Classifications

September 1, 2022 - August 31, 2023



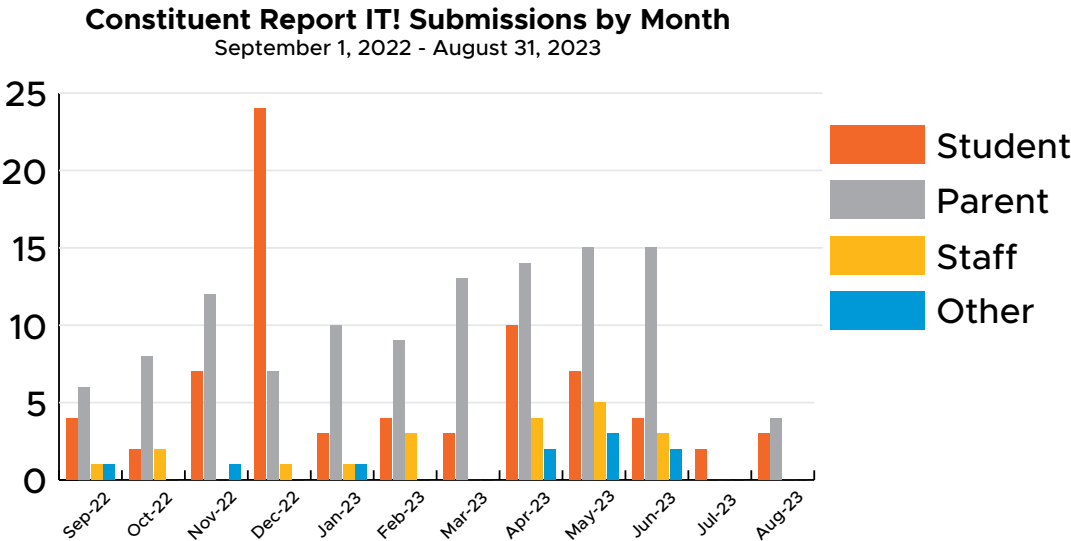
Report IT! N/A Sub-Classifications

September 1, 2022 - August 31, 2023



2.5 Report IT! Monthly Data Review and Analysis

This section considers monthly trends from the launch of Report IT! to the end of the 2022-2023 Reporting Year. As the program matures, increased data collected over time will afford more opportunity to identify trends and compare them both monthly and annually.

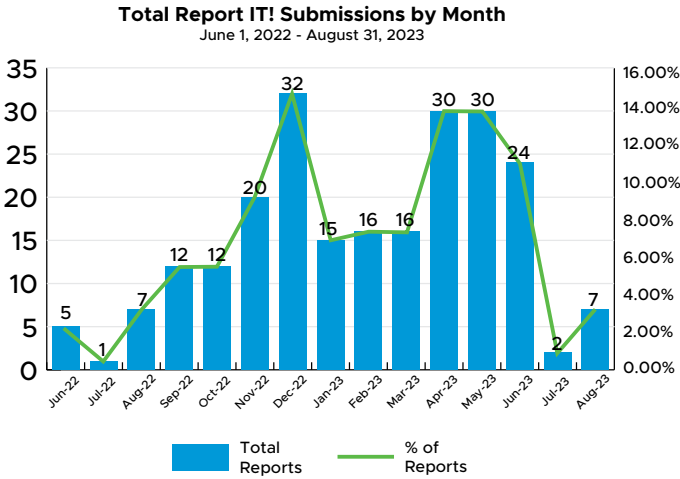


Constituent Report IT! Submissions by Month

Of the 13 reports submitted during the first three months, most were received in June at the end of the 2021-2022 Reporting Year, and in August heading into the 2022-2023 Reporting Year. Due to the limited amount of data for the 2021-2022 Reporting Year, it is not representative of what the data will actually look like annually. Parents are the early adopters in the system for utilizing the Report IT! tool. Reporting trends appear to be more consistently spread out during the 2022-2023 Reporting Year. A higher volume of report submissions from parents came through near the end of the first term in November (12) and increased again in the second term in March (13) through April (14), May (15) and June (15). For students, report submissions were the highest in December (24) and April (10), though the large increase was due to a student that made repeated submissions about an issue.

Submissions were largely made by parents to address an issue that they became aware of through end-of-year reporting or due to reach out by the school.

At this stage there is not enough Report IT! submissions from staff or other stakeholders in general to extrapolate trends or consider trends as generalizable across the system. More engagement with system leaders and the various staffing groups is needed to ensure they have a clearer understanding of the Report IT! tool and the COHREA’s mandate, purpose, process, pathways, and potential outcomes of engaging with the department.



Considering total report submissions for the 2022-2023 Reporting Year, the most significant month-over-month trend shows a cycle of reporting throughout the Reporting Year with increased submissions occurring around the end of the fall term from November and peaking in December. Submissions reduce in the first couple of months of the winter term but increase again in April and sustain through to the end of the Reporting Year.

2.6 Early Resolutions and Formal Investigation

Early resolution is a process that may take place, with mutual consent of parties, prior to or even during the course of a formal investigation. It does require relevant parties involved to consent to the COHREA 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.

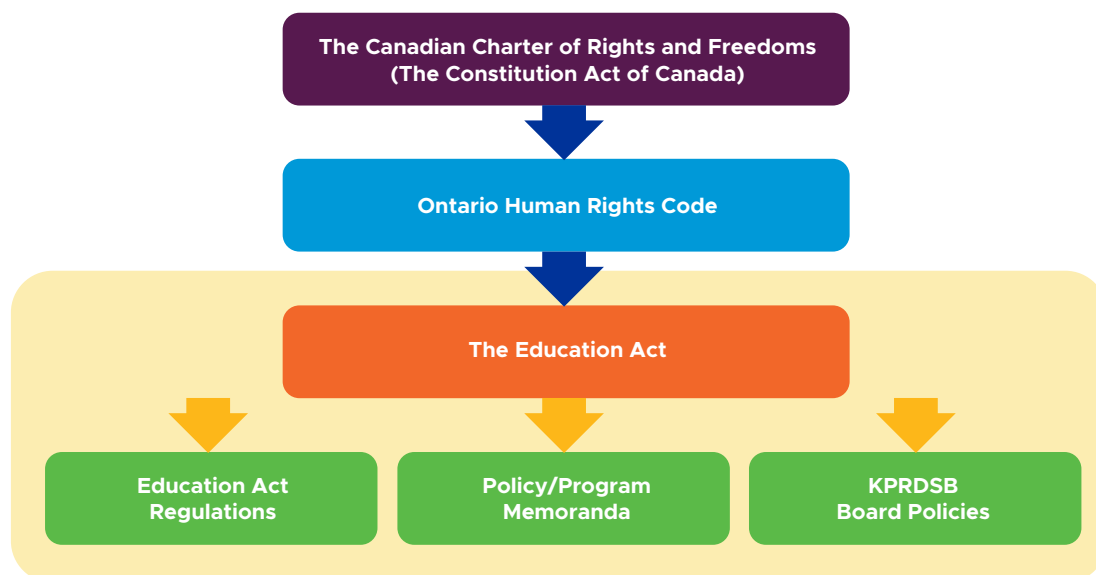
The conciliation process only takes place after a formal investigation is completed (but before a determination is made) and when the parties involved have an idea whether the allegations are substantiated. Findings are made clear through a post-investigation interview by the HREA Commissioner. It is intended as a final, last-minute opportunity of empowering the parties to come to a resolution so that they are able to move beyond the conflict. At the conciliation 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. At the end of conciliation, if there is no agreement or settlement, the Investigation Report is sent to the Director of Education or to be addressed for possible referral to the Superintendent of Human Resources, in the case of staff, for appropriate action.

3.0 Policy Development

3.1 Human Rights

Building and maintaining an educational culture free of discrimination and harassment is vital to KPR in acknowledging and expecting individual and collective responsibility. This includes accountability by all members of the KPR community, and unwavering commitment to ensure a welcoming, anti-discriminatory, inclusive, and affirming educational environment. In meeting legal obligations under the Code, an effective, equitable and accessible human rights complaints process is paramount to addressing discrimination and/or harassment matters that are in violation of the Code.

The overarching purpose of KPR human rights policy is to confront and immediately address all reported or known instances and incidents of Code-based discrimination and/or harassment; and to act upon complaints of such behaviour promptly, fairly, judiciously and with due regard to confidentiality for all parties concerned.



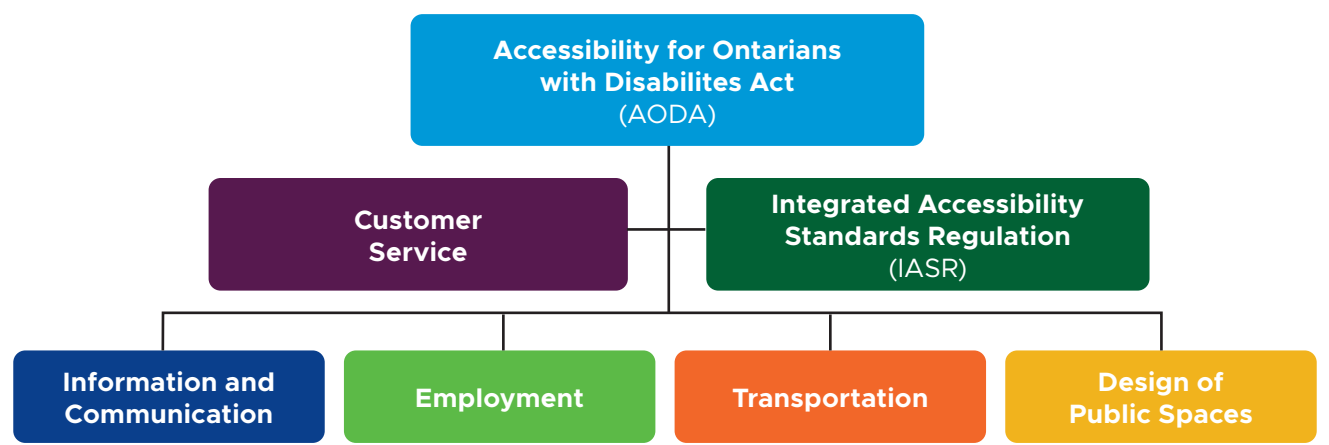
Board Policy B-3.3, Human Rights: Code-Based Discrimination and Harassment, was introduced during the 2022-2023 Reporting Year. The policy consists of seven sections that outline and define all relevant details of the Code as it relates to KPR. It includes an overview of the five social areas and definitions of seventeen protected grounds addressed by the Code. For example, human rights (Ontario law grants every person with a right to equal treatment with respect to services, goods and facilities without discrimination), 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.). Board Policy B-3.3 is subject to a board review and renewal process subject to specific timelines and can be found on the KPR website.

3.2 Accessibility Policy

The objective of Board Policy B-3.4, Accessibility for Persons with Disabilities, is to establish 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 is to demonstrate the board's commitment in actively removing barriers and increasing accessibility and participation for all members of its community to maintain compliance through this policy.

With a keen understanding that learning, belonging, and relationships matter within every aspect of public education, KPR is especially committed to accessibility and addressing barriers that exist for persons with disabilities. Excellence in education is founded on respect for the dignity and humanity of all individuals and is premised on the development of human potential by enabling individuals and groups with the necessary tools and skills to contribute fully within a diverse society. KPR's commitment to a barrier-free working and learning culture demands that we foster fair, nurturing, positive and respectful environments for all members of the board community. Acknowledging different aspects of ableism is core to this ongoing work and the board's ongoing commitment to human rights.

During the 2022-2023 Reporting Year, Board Policy B-3.4, Accessibility for Persons with Disabilities, was developed and introduced. It contains relevant information on KPR compliance with the AODA and the board’s commitment to ensuring decision-making in areas that fall under the following AODA Standards.



The policy 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 a process for removal is instituted.

4.0 Human Rights Education and Engagement

4.1 Senior Management

Ongoing human rights education was provided to KPR’s senior team through individual consultation and guidance for addressing various complaint matters relating to one or more of the protected grounds in the Code or an issue of discrimination and harassment in which someone made the allegation of a failure to accommodate. In all instances, 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. Several formal training presentations took place during the 2022-2023 Reporting Year; most notably a session on the application and utility of the Human Rights Based-Approach to leadership decision-making.

4.2 Principals and Vice-principals

Several learning sessions on the Human Rights-Based Approach and an introduction to Board Policies B-3.3, Human Rights: Code-Based Discriminations and Harassment, and B-3.4, Accessibility for Persons with Disabilities, were provided to principals and vice-principals at Professional Activity (PA) days at the Kirby Professional Learning Centre in the fall term of 2022 and winter term of 2023.

4.3 Unions

Engagement with union Presidents took place primarily through advisory processes and where the union participation occurred through representation as accompanying persons to human rights complaint consultations. The HREA Commissioner presented to the Union presidents at their annual Away Day in the fall of 2022 on the Report IT! confidential online reporting tool and its intended purpose.

4.4 Board Staff

During the 2022-2023 Reporting Year, there was ongoing advisory services provided to the Labour Relations team in Human Resource Services specifically to answer questions relating to the Human Rights Code. A learning session was also provided to the Administrative Leadership Group Management on the role of the COHREA and the internal complaints process.

4.5 Trustees

Shortly after the hiring of the HREA Commissioner, one-on-one introductory meetings took place with all trustees. It was an opportunity to discuss key issues that trustees deemed important and to build awareness and understanding of the newly created COHREA. Throughout the 2022-2023 Reporting Year, various individual trustees requested confidential consultation on various issues of concern. There were several formal learning sessions with the most notable being a session in January 2023 which introduced the Human Rights-Based Approach and an overview of Policy B-3.3, Human Rights: Code-Based Discrimination and Harassment.

5.0 Accessibility

5.1 Accessibility Advisory Committee

The Accessibility Advisory Committee (AAC) was created and launched during the 2022-2023 Reporting Year and is made up of 21 members with wide representation across all board constituencies for implementing an inclusive approach to accessibility as outlined in Board Policy B-3.4. Its work centres on ensuring that the board maintains and complies with the requirements of the Accessibility for Ontarians with Disabilities Act (AODA), including providing leadership, review, and recommendations to the various constituencies on AODA compliance. Through AAC consultation, a collaborative approach was designed with the goal of identifying and eliminating barriers in the service, work and learning environment for our students, teachers, board staff, volunteers and other relevant stakeholders toward recommending systemic changes as may be required. The AAC has a key role in assisting with developing the Multi-year Accessibility Plan (MYAP) going forward. The AAC consists of seven AODA subcommittees/working groups constituting specialized units tasked with implementing the board's AODA accessibility plan and conducting self-audits for identifying accessibility achievements and ongoing or anticipated initiatives. They report to and act under the general direction of the AAC and include the following:

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

5.2 Accessibility Survey and Self-Audit Process

In June of the 2022-2023 Reporting Year, the COHREA launched a comprehensive Accessibility system survey inviting staff at all levels within KPR to participate. The survey ran for three weeks and included questions related to the AODA and the five standards. The survey was anonymous, and the information collected is being used in support of developing KPR's MYAP. Additionally, the survey has assisted in our overall understanding of the status of accessibility within KPR with the goal of advancing accessibility literacy, along with identifying, reviewing and ultimately, removing barriers to accessibility.

At the end of the 2022-2023 Reporting Year, the KPR departmental self-audit process was initiated. The self-audit served as a qualitative review on the status of accessibility within various departments at KPR where they consulted with the COHREA staff in completing the Accessibility Self-Audit Form. It served as an opportunity to collect current and relevant data and understanding from each department on past and current barriers for the purpose of barrier identification and developing clear processes in ensuring equitable opportunities and options, for persons with disabilities. In addition, the overarching objectives of the self-audit process were to allow KPR departments to engage in self-examination and valuation of:

- where they believe they are currently situated in terms of general accessibility and specific barriers;
- where they believe there is a need to be more attentive addressing specific accessibility barriers; and,
- what they determine is needed (e.g., resources, training, etc.) for barrier removal with the goal of ensuring wider accessibility.

The self-audit data is also to be used to assess the current positionality of each department regarding the application of the accessibility standards under the AODA, along with some general requirements within the IASR. During the 2023-2024 Reporting Year, this information will be reviewed and accessed in informing the AAC and supporting committees in the work for developing the framework for KPR's MYAP.

5.3 Multi-year Accessibility Plan

During the 2022-2023 Reporting Year the COHREA commenced the process of collaborating with the AAC and its supporting subcommittees in developing KPR's renewed MYAP in meeting its compliance obligations under the AODA. The work of design, introduction, and implementation of the MYAP will be carried over into the 2023-2024 Reporting Year. The MYAP will outline KPR's vision that all students, employees, and members of the wider KPR

community are accorded the right to access a barrier-free working and learning environment that supports the dignity of each individual with a systems approach to dismantling barriers for persons with disabilities. This will be reflected throughout the KPR community where people with disabilities:

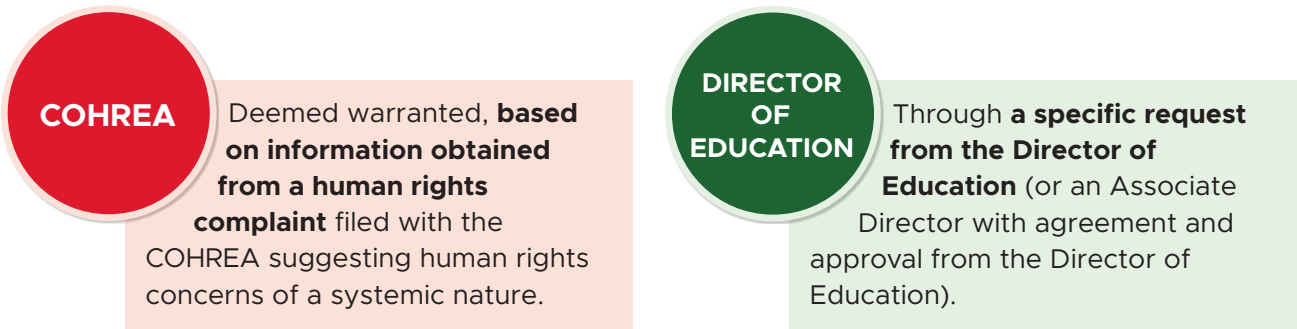
- are able to enter our premises and reach their destinations without encountering barriers,
- receive the services they require without encountering barriers,
- are able to work without encountering barriers, and
- are assured that accessibility and inclusion are fully incorporated into our policies and practices; and feel confident that accessibility is accepted as everyone’s responsibility.

6.0 Site Review Protocol

During the 2022-2023 Reporting Year, the HREA Commissioner introduced the Site Visit Protocol for addressing human rights concerns that are deemed to be systemic in nature. A Site Visit to a KPR school or department by the COHREA would be premised on addressing possible discrimination and harassment issues using a proactive and impartial approach, as opposed to waiting for a complaint to be filed. Thus, its sole purpose is predicated on examining potential systemic discrimination or a poisoned work environment or discriminatory educational school environment that may be occurring or may have occurred, attributable to factors and causes known or unknown. It was designed as a prevention-based model for addressing suspected or potential discrimination and harassment issues. A Site Visit is a process that is impartial in nature and is not designed to assign or attribute blame to any parties.

Site Visits may be initiated through the receipt of an individual complaint, where in the course of the preliminary assessment and general review of allegations of behavior and practices, it is determined that a more expansive review of systemic issues relevant to human rights necessitates a deeper exploration. Thus, while the original complaint may not result in a finding of discrimination pursuant to Board Policy B-3.3, Human Rights: Code-Based Discrimination and Harassment, information, information from the allegations could suggest that there may be issues of a systemic nature that require further inquiry.

The following is the two ways in which the Site Visit Protocol would be triggered for a review to take place:



In deciding on whether a Site Visit is warranted, the HREA Commissioner's evaluation would consider whether the nature of the review would indicate that:

- it falls within the COHREA priority mandate of ensuring compliance and adherence to human rights,
- the nature of the concern suggests that there exists a broad, systemic impact to stakeholders (students and students),
- it raises significant issues of board policy or board stakeholders' interest from a human rights perspective,
- it will affect vulnerable or marginalized people protected by the Code,
- it will assist in shaping, clarifying or advancing human rights-based approaches and initiatives at the KPR,
- it is sufficiently important and/or complex suggesting COHREA involvement is needed and would be beneficial to the system, and
- the review can be conducted within existing COHREA resources.

During the 2022-2023 Reporting Year a very short Site Visit Review was done pertaining to an incident that occurred at a KPR school. Upon a request from the Director of Education, two consultations forums were conducted, and a report was completed.