



**STAFF REPORT  
ACTION REQUIRED**

**2013 Annual Human Rights Office Report**

<b>Date:</b>	August 6, 2014
<b>To:</b>	Executive Committee
<b>From:</b>	City Manager
<b>Wards:</b>	All
<b>Reference Number:</b>	

**SUMMARY**

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This report provides information on harassment and discrimination complaints filed by employees and service recipients of the City of Toronto to the City's Human Rights Office (HRO); the Human Rights Tribunal of Ontario (HRTO); and through the City's grievance/arbitration process in 2013. The report discusses complaint trends and identifies practices adopted by the HRO to minimize legislative breaches, penalties and risks to the City.

The City's internal human rights and equity approach has again resulted in the City incurring no penalties in 2013, from the provincial bodies charged with hearing harassment and discrimination complaints, i.e., the Human Rights Tribunal of Ontario, Arbitration, the Ministry of Labour, the Ontario Labour Relations Board.

**Table 1 – Harassment and/or Discrimination Enquiries/Complaints in 2013**

<b>Harassment/Discrimination Enquiries/Complaints:</b>	<b>Total in 2013:</b>
Consultations with employees and service recipients	733
Complaints filed to the City's HRO by employees and service recipients	257
Grievances filed by employees	101
Applications filed to the HRTO by employees and services recipients	35

The most often cited grounds of complaints raised to the HRO, similar to previous years' complaint patterns, were: workplace harassment, disability, race and sex (Table 3). City employees filed 101 discrimination grievances in 2013 and the most often cited grounds were workplace harassment and disability (Table 5). Complaint trends in the 35 applications filed by service recipients and employees to the HRTO were similar to previous years: disability, race and sex related grounds were cited most often (Table 7).

As an integrated Equity, Diversity and Human Rights Division, the Human Rights Office's objective is to advance equity and foster inclusion by enhancing the reach and application of the City's existing policies and legislative obligations. The HRO does this in two ways: by balancing its innovative and proactive initiatives to promote equity with its complaint management function; and by promoting protections to both employees and service recipients, particularly those deemed vulnerable.

In this capacity, the HRO has amended the City's Accommodation Policy (previously the "Employment Accommodation Policy"). The duty to accommodate is a legal obligation that requires employers and service providers to address disadvantage experienced by individuals and/or groups protected under the Ontario Human Rights Code. Examples of employee and/or service recipient accommodations include modifying facilities to facilitate accessibility for people with mobility disabilities, rescheduling meetings on high holy days to foster participation of individuals whose creed requires them to refrain from work, etc.

The amended policy clarifies that the City's duty to accommodate extends to recipients of municipal services in addition to employees. Policy revisions enhance the City's commitment to promote greater inclusiveness and improved accessibility, in part by emphasizing the importance of viewing accommodation through a systemic lens and by highlighting the City's legislative obligation to comply with the Accessibility for Ontarians with Disabilities Act.

## **RECOMMENDATIONS**

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The City Manager recommends that:

1. City Council adopt the revised Accommodation Policy

## **FINANCIAL IMPACT**

The revised Accommodation Policy reflects the City's existing legal obligation regarding service provision accommodation. This report and recommendations will have no financial impact beyond what has already been approved in the current year's budget.

## **EQUITY IMPACT STATEMENT**

The Human Rights Office advances equitable employment practices and service provision by undertaking initiatives to educate and resolve human rights complaints and by embedding equity, diversity and human rights principles into all employment and service activities.

## **DECISION HISTORY**

The City's Human Rights and Anti-Harassment/Discrimination Policy requires the submission of an annual report to City Council about statistics and trends in human rights enquiry and complaint activities and on other program initiatives.

Staff report for action on Annual Human Rights Office Report – 2013

## ISSUE BACKGROUND

The City's Human Rights Office (HRO) administers an internal dispute resolution program through the City's Human Rights and Anti-Harassment/Discrimination Policy (HRAP) and Complaint Procedures. The program satisfies obligations in the *Accessibility for Ontarians with Disabilities Act* (AODA), the *Ontario Human Rights Code* (Code) and the *Occupational Health and Safety Act* (OHSA).

The mandate of the HRO is to advance accessible, equitable employment practices and service provision through education and dispute resolution of employee and service recipient harassment and discrimination complaints.

## COMMENTS

### 2013 Analysis of Complaint Resolution Options:

The HRO delivers its mandate by providing expert advice and/or consultation, complaint investigations/interventions and developing and supporting initiatives to advance equity.

The following is a comparison of the 3 (HRO, Grievance, HRTO) internal and external harassment/discrimination complaint resolution avenues available to employees and service recipients; an assessment of complaint trends, and a review of HRO service use and activities to promote consistent practices and address emerging human rights issues.

The HRO responded to a total of 990 human rights related issues raised by employees and service recipients in 2013 (Table 2).

**Table 2** – Employee and Service Recipient Consultations and Complaints Managed by the HRO 2011 to 2013

Year	Consultations	Complaints	Total by Year
2011	854	199	1053
2012	973	175	1148
<b>2013</b>	733	257	990

While consultations to the HRO decreased in 2013 by 240 or 25%, complaints and interventions managed by the HRO increased by 72 or 41%.

### 1. Consultations/Complaints Raised by Employees and Service Recipients to the HRO:

Table 3 below, captures employee and service recipient consultations and complaints raised to and managed by the City's HRO, broken down by prohibited ground. Table 4, provides information on the pattern of service recipient consultations/complaints, by prohibited ground raised to and managed by the HRO.

**Table 3 – Employee and Service Recipient Consultations and Complaints Managed by the HRO by Prohibited Ground; 2011 to 2013**

Prohibited Ground	Consultations			Complaints			Total By Ground		
	2011	2012	2013	2011	2012	2013	2011	2012	2013
No Ground / Other	596	711	524	43	38	45	639	749	569
Workplace Harassment	119	139	86	67	76	55	186	215	141
Disability	71	85	53	34	34	41	105	119	94
Sex (including sex harassment, pregnancy, breastfeeding)	38	36	15	33	31	25	71	67	40
Race	22	30	17	13	8	22	35	38	39
Colour	2	8	2	1	2	7	3	10	9
Origins – Ethnic	-	1	1	1	1	10	1	2	11
Origins – Place	3	1	-	1	1	14	4	2	14
Origins – not specified	-	2	-	-	3	-	-	5	-
Ancestry	2	1	1	1	1	2	3	2	3
Creed/Religion	12	13	11	7	5	24	19	18	35
Family Status	9	15	8	2	5	17	11	20	25
Sexual Orientation	9	10	9	4	7	4	13	17	13
Gender Expression	-	-	-	-	-	4	-	-	4
Gender Identity	-	-	7	-	-	6	-	-	13
Reprisals	2	4	3	3	1	7	5	5	10
Age	6	1	4	3	3	5	9	4	9
Citizenship	-	-	-	-	-	1	-	-	1
Marital Status	1	-	-	-	-	-	1	-	-
Record of Offences	2	1	-	1	-	1	3	1	1
Receipt of Public Assistance	-	-	1	-	-	-	-	-	1
Membership in a Union or Staff Association	1	-	2	-	-	-	1	-	2
Level of Literacy	-	1	-	-	-	1	-	1	1
Political Affiliation	1	-	-	1	-	1	2	-	1
<b>Total</b>	<b>896</b>	<b>1059</b>	<b>744</b>	<b>215</b>	<b>216</b>	<b>292</b>	<b>1111</b>	<b>1275</b>	<b>1036</b>

*Note:* The totals in Table 3 are higher than the total number in Table 2 because some complainants cite multiple grounds.

#### No Ground/Other:

The “No Ground/Other” category captures equity issues that human rights staff are consulted on that are not related to a prohibited ground in the policy, i.e., policy/program development, accessible service delivery, equitable employment practices, education design, etc. The decrease in these consultations is linked to successful efforts to embed access, equity and diversity principles in strategic City program and service activities. 2013 highlights included incorporating access, equity and diversity actions into the City's Strategic Plan, the Talent Blueprint and piloting an equity lens to assess employment and service outcomes.

Workplace Harassment (*Occupational Health and Safety Act*):

The *Occupational Health and Safety Act* (OHSA) requires the City to address *Workplace harassment*; harassment unrelated to a prohibited ground in the Code. Workplace harassment continues to be the most frequent ground cited to the HRO.

The reduction in workplace harassment consultations and complaints to the HRO in 2103 is linked to two key 2013 amendments made by the HRO to the Anti-Harassment/Discrimination Policy:

1. Obliging employees to raise workplace harassment concerns to management to give them an opportunity to resolve before an employee can file a complaint to the HRO
2. Obliging management to address incivility, i.e., workplace conduct that falls shy of prohibited conduct.

Another OHSA requirement with respect to harassment is to undertake an annual Human Rights and Anti-Harassment/Discrimination Policy review. This resulted in clarifying confidentiality and support person provisions and resolution options for service recipients in the Complaint Procedures thus further building human rights capacity within divisions.

Prohibited Grounds (*Ontario Human Rights Code*):

Disability (often related to accommodation issues) as a ground of discrimination was the most frequently cited prohibited Code ground raised to the HRO, similar to previous years' complaint patterns.

Effective communications, education and production of resources detailing the rights and requirements arising from the *Accessibility for Ontarians with Disabilities Act* (AODA) resulted in a reduction of disability consults. However, there was an increase in complaints to the HRO from individuals who believed that their rights were infringed. It is anticipated that implementation of the AODA's requirement for City divisions to have documented individual accommodation plans beginning in 2014 will support the City's ability to consistently address disability accommodation requests.

The next most frequently cited prohibited grounds raised to the HRO were race and related grounds (colour, ancestry, ethnic origin and place of origin) and sex and related grounds (gender identity, gender expression, sex harassment, pregnancy & breastfeeding). However, there were few policy breaches substantiated by the HRO on these grounds in 2013. Education and resources to raise awareness and address emerging trends will continue to be developed and promoted by the HRO.

Similarly, the increase in *Family Status* and *Creed* discrimination consultations and complaints in 2013 is linked to the HRO's efforts to increase awareness of rights and obligations through communications and the dissemination of resources.

It is to be noted that the practice of balancing education/awareness with complaint resolution by the HRO specifically and EDHR generally, is an effective strategy to address the larger issue of not only having rights but also the capacity to exercise those rights.

Consultations and Complaints Raised to the HRO by Service Recipients:

Residents and service recipients may complain under the City's Human Rights and Anti-Harassment/Discrimination Policy about discrimination and harassment in the administration and delivery of City services, access to and use of City facilities, occupancy of City-owned accommodations, or discrimination in legal contracts. Table 4 reflects the pattern of service provision consultations and complaints by prohibited ground for the period 2011 – 2013.

Consultations primarily related to requests for information regarding the City's dispute resolution approach. The decrease in disability consults and complaints is likely due to implementation of AODA standards, improving accessibility for service recipients.

**Table 4 - Pattern of Service Recipient Consultations and Complaints by Ground, 2011 – 2013**

Ground	EXTERNAL Consultations			EXTERNAL Interventions & Complaints			Total		
	2011	2012	2013	2011	2012	2013	2011	2012	2013
No Ground/Other	52	33	45	-	4	4	52	37	49
Disability	4	10	2	3	3	2	7	13	4
Creed/Religion	2	1	-	2	-	-	4	1	-
Workplace Harassment	3	4	2	3	4	-	6	8	2
Race	1	9	2	3	-	2	4	9	4
Receipt of Public Assistance	-	-	1	-	-	-	-	-	1
Record of Offences	-	-	-	-	-	1	-	-	1
Reprisal	-	-	-	-	-	1	-	-	1
Colour	1	2	1	-	1	1	1	3	2
Origins – Ethnic	-	-	-	-	1	2	-	1	2
Origins – Place	-	1	-	-	-	2	-	1	2
Ancestry	-	1	-	-	-	-	-	1	-
Citizenship	-	-	-	-	-	1	-	-	1
Family Status	-	2	-	-	-	-	-	2	-
Sexual Orientation	1	1	3	-	-	-	1	1	3
Sex (including pregnancy, breastfeeding)	6	1	1	4	2	1	10	3	2
Gender Identity	-	-	-	-	-	-	-	-	-
Gender Expression	-	-	-	-	-	-	-	-	-
Sexual harassment	-	-	1	-	-	-	-	-	1
Age	-	-	1	-	1	1	-	1	2
Level of Literacy	-	-	-	-	-	-	-	-	-
Political Affiliation	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>70</b>	<b>65</b>	<b>59</b>	<b>15</b>	<b>16</b>	<b>18</b>	<b>85</b>	<b>81</b>	<b>77</b>

## 2. Employee Harassment/Discrimination Complaints Addressed by the Grievance/Arbitration Process:

Employees who belong to a union may grieve harassment and discrimination through provisions in their respective Collective Agreements. The Employee and Labour Relations (ELR) Unit of the Human Resources Division has responsibility for managing grievances and reported receiving 101 harassment/discrimination grievances in 2013 – refer to Table 5.

As with other complaint avenues, disability continues to be the most often cited prohibited ground of harassment/discrimination grieved. The events that give rise to grievances that are not connected to a ground and/or those tied to discipline, typically have no link to harassment and/or discrimination as a prohibited ground. There were no arbitration awards regarding employee harassment or discrimination in 2013.

**Table 5 – Employee Harassment and Discrimination Grievances by Prohibited Ground for the Period 2010-2013:**

<b>Prohibited Ground:</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
Disability (failure to accommodate)	39	27	24	35
Sex	-	-	-	-
Race	1	1	1	2
Colour	-	-	-	-
Place of Origin	-	-	-	-
Ethnic Origin	1	-	-	-
Ancestry	-	-	-	-
Creed/Religion	1	-	-	-
Family Status	-	-	-	-
Sexual Orientation	1	-	-	-
Gender Expression	-	-	-	-
Gender Identity	-	-	-	-
Age	-	1	-	-
Citizenship	-	-	-	-
Marital Status	-	-	-	-
Record of Offences	-	-	-	-
Reprisal	-	-	1	1
Workplace Harassment	74	80	71	18
Tied to Discipline	-	-	-	7
ground not identified	-	-	-	38
<b>Total</b>	<b>117</b>	<b>109</b>	<b>97</b>	<b>101</b>

## 3. Employee and Service Recipient Complaints Filed to the HRTO:

All service recipients and employees have a legal right to file human rights complaints directly to the HRTO. The Legal Services Division is responsible for representing the City's interests at HRTO hearings and reported receiving a total of 35 HRTO applications filed in 2013; 25 from employees and 10 from service recipients (Table 6).

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**Table 6 – Total Applications Filed by Employees and Service Recipients to the HRTO 2010 - 2013**

Year	Employee	Service Recipient	Total Applications
2010	25	6	31
2011	23	10	33
2012	10	3	13
2013	25	10	35

Table 7 captures HRTO the complaints in Table 6 by prohibited ground filed during the same period noted in Table 6 above, between 2010 and 2013. The total grounds in Table 7 are greater than the total number of HRTO applications reflected in Table 6 because HRTO applicants typically file upon multiple grounds.

**Table 7 - HRTO Applications Reported by Legal Services Division, by Ground 2010 – 2013**

Prohibited Ground	HRTO complaints received by Legal Services Division – by Ground for 2010/2011/2012/2013											
	Employee related				Service related				Total Grounds Cited			
	2010	2011	2012	2013	2010	2011	2012	2013	2010	2011	2012	2013
Disability	13	10	5	13	2	4	1	2	15	14	6	7
Sex (including pregnancy, breastfeeding)	3	6	7	2	1	2	-	2	4	8	7	4
Gender Identity	-	-	-	1	-	-	-	1	-	-	-	2
Gender Expression	-	-	-	-	-	-	-	1	-	-	-	1
Race	4	5	2	4	2	4	3	3	6	9	5	7
Colour	1	5	3	1	1	2	3	2	2	7	6	3
Origins – Ethnic	-	4	1	2	-	2	1	2	-	6	2	4
Origins – Place	1	4	-	2	-	1	1	2	1	5	1	4
Ancestry	-	4	1	1	-	1	1	1	-	5	2	2
Creed/Religion	1	-	1	1	-	3	1	1	1	3	2	2
Family Status	2	1	-	-	-	1	2	2	2	2	2	2
Sexual Orientation	1	2	-	-	-	1	-	1	1	3	-	1
Reprisals	8	9	2	5	-	1	2	1	8	10	4	6
Age	5	2	1	3	-	-	1	1	5	2	2	4
Citizenship	-	1	-	-	-	1	-	1	-	2	-	1
Marital Status	1	-	-	-	-	1	2	1	1	1	2	1
Record of Offences	1	-	1	-	-	-	1	-	1	-	2	
Receipt of Public Assistance	-	-	-	-	-	-	-	1	1	-	-	1
<b>Total</b>	<b>41</b>	<b>53</b>	<b>24</b>	<b>35</b>	<b>6</b>	<b>24</b>	<b>19</b>	<b>25</b>	<b>48</b>	<b>77</b>	<b>43</b>	<b>52</b>



Of the 35 applications filed to the HRTO in 2013, (Table 6), 5 complaints were also raised to the HRO by employees. The HRO declined to intervene into one complaint and it was also dismissed by the Tribunal. The HRO made findings of discrimination in the second complaint which the division declined to accept and this complaint is pending at the Tribunal. The last 3 employee applications were grieved at the same time they were raised to the HRO and HRTO. Under the City's Human Rights and Anti-Harassment/Discrimination Policy, to avoid duplicating complaint resolution processes, the HRO cannot intervene or investigate a complaint where another complaint avenue has been engaged.

Table 8 below captures HRTO (final) decisions by prohibited ground released by the HRTO between 2010 and 2013. These decisions are not based on the applications received by the City in the same year because a Tribunal complaint can take 2-3 years to progress to a final decision. The HRTO released 10 final decisions in 2013, dismissing all complaints against the City related to 5 employee and 5 service recipient complaints.

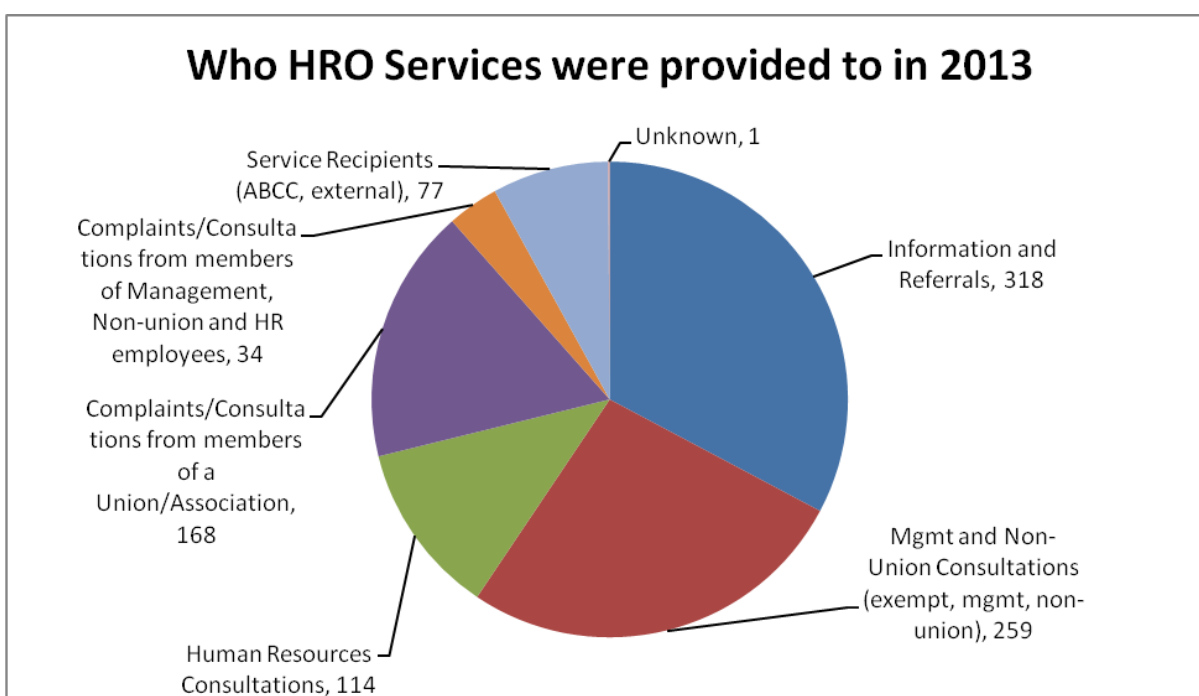
**Table 8 - HRTO Final Decisions by Prohibited Ground 2010 - 2013**

Prohibited Ground	HRTO Final Decisions – by Ground for 2010/2011/2012/2013											
	Employee related				Service related				Total Grounds Cited			
	2010	2011	2012	2013	2010	2011	2012	2013	2010	2011	2012	2013
Disability	-	7	2	2	-	1	1	3	-	8	3	5
Sex (including sex harassment, pregnancy and breastfeeding)	1	2	1	-	1	1	-	1	2	3	1	1
Gender Identity	-	-	-	-	-	-	-	1	-	-	-	1
Gender Expression	-	-	-	-	-	-	-	1	-	-	-	1
Race	-	1	1	-	2	2	4	3	2	3	5	3
Colour	-	-	-	-	-	-	2	2	-	-	2	2
Origins – Ethnic	-	2	-	-	-	-	2	1	-	2	2	1
Origins – Place	-	1	1	-	-	-	1	1	-	1	2	1
Ancestry	-	2	-	-	-	-	1	1	-	2	1	1
Creed/Religion	-	2	-	-	-	-	-	1	-	2	-	1
Family Status	-	-	1	-	1	-	1	2	1	-	1	2
Sexual Orientation	-	-	1	1	-	1	-	1	-	1	1	2
Reprisals	-	1	1	1	-	-	1	3	-	1	3	4
Age	1	2	-	1	-	-	-	1	1	2	-	2
Citizenship	-	-	-	-	-	-	-	1	-	-	-	1
Marital Status	-	-	-	-	-	-	1	2	-	-	1	2
Record of Offences	-	-	-	-	-	-	-	-	-	-	-	-
Receipt of Public Assistance	-	-	-	-	-	1	-	1	-	1	-	1
<b>Total</b>	<b>2</b>	<b>20</b>	<b>8</b>	<b>5</b>	<b>4</b>	<b>6</b>	<b>14</b>	<b>26</b>	<b>6</b>	<b>26</b>	<b>22</b>	<b>31</b>

### HRO Service Users in 2013:

Service use is monitored to ensure program resources are appropriately aligned (Table 9). The largest group the HRO provided services to those seeking ‘information and referrals’. City management and Human Resources Division staff are the second largest group seeking HRO services. Consultations by this group relates to seeking HRO assistance to respond to human rights related issues raised to them in their management roles. Both groups have specific human rights accountabilities under the amended City Human Rights and Anti-Harassment/Discrimination Policy and consultations with the Human Rights Office are encouraged to foster consistent human rights practices throughout the organization.

**Table 9 - HRO Service Users in 2013:**



### **Advancing Equity in 2013 through Education, Training and Communications:**

While legislation requires employers to have an internal complaints resolution process, preventive efforts are more effective at minimizing complaints and advancing access, equity and diversity in City employment practices and service provision. Ensuring equitable City policies, programs and service provision is a core value of the HRO.

Key accomplishments undertaken by the HRO in 2013 include implementing 3 amended anti-discrimination policies reflecting new provisions in the *Occupational Health and Safety Act*, *Ontario Human Rights Code*, and the *Accessibility for Ontarians' with Disabilities Act* (AODA) and going beyond legislated obligations to promote inclusion.

As noted earlier, the amended policy requires management to address workplace conduct that falls shy of prohibited conduct, i.e., incivility. The amended policy also requires individuals/organizations contracted by the City to deliver City services to address discrimination complaints consistent with legislated and City policy obligations, or be subject to consequences for non-compliance up to and including having the contract revoked.

As part of the City's ongoing compliance with the Employment Standard of the AODA, in late 2013 the HRO developed a guideline, procedure and communication to the corporation about the requirement to individually document accommodation for employees with disabilities. This standard took effect on January 1, 2014.

Education and communication play important roles in ensuring that all members of the Toronto Public Service are familiar with their rights and responsibilities in preventing, addressing and resolving human rights concerns. The HRO developed a variety of resources to address complaint trends, raise awareness and support inclusion:

1. The *Civility@Work* campaign was launched at the C.U.P.E. Local 79/416 Equity Forum in early 2014
2. Resources were developed on the new Code grounds of *Gender Identity* and *Gender Expression*
3. Communications on expanded protections related to *Family Status* were implemented
4. Resources on *Creed* accommodation were implemented

The Human Rights Office developed a new and expanded education curriculum in 2013 to support City staff in exercising their rights and obligations under anti-harassment/discrimination legislation and the City policy. The Human Resources Division has responsibility for administering delivery of human rights training. In 2013, 1004 city staff attended a total of 31 human rights training sessions. Table 10 captures a 5-year snapshot of human rights related training activity between 2008 and 2013.

**Table 10 – Human Rights Training Activity 2008 – 2013**

year	# Union attendees	# union sessions	# mgmt. attendees	# mgmt. sessions	Total Sessions	Total Participants
2008	261	9	2441	138	147	2702
2009	387	20	310	19	39	697
2010	411	22	466	25	47	877
2011	187	12	214	12	24	401
2012	1380	61	217	15	76	1597
2013	871	24	133	7	31	1004

**2014 Key Objectives (Accommodation Policy and services for undocumented residents):**

In 2014, the HRO will implement a revised Accommodation Policy (Appendix1). Exploring accommodation is a legal obligation for all employers and service providers under the *Ontario Human Rights Code* (Code) and related jurisprudence. The duty to accommodate recognizes that certain individuals and/or groups protected in the Code may require supports in order to

Staff report for action on Annual Human Rights Office Report – 2013

fully participate in all aspects of employment and service provision. The City's current policy focuses on accommodation for employees. The amended policy will articulate the City's commitment to meet its duty to accommodate in both employment and service provision based on the protected grounds in the Code and the City's Human Rights and Anti-Harassment/Discrimination Policy. The policy's broader emphasis enhances inclusiveness and accessibility. Procedures on how to request accommodation and guidelines on accommodations that typically arise in employment and service provision will be made available to support City management in responding to requests and ensure that employees and service recipients know how to exercise their rights.

The second major equity initiative the HRO will focus on is the implementation of City Council's direction regarding access to City services for Undocumented Torontonians. The HRO will work with City staff to communicate the availability of protections regarding equal treatment with respect to City services and facilities without discrimination and/or harassment because of immigration status. This protection will include access to the HRO's dispute resolution process to address service recipient discrimination complaints through the City's Human Rights and Anti-Harassment/Discrimination Policy on the ground of Citizenship.

#### Conclusion:

The HRO's human rights complaint management approach has proven to be both a viable alternative to more adversarial formal complaint avenues (i.e. grievance arbitration and the Human Rights Tribunal of Ontario) and an effective mechanism to advance equity. The HRO will continue to monitor complaint trends and promote dispute resolution services to all employees and service recipients building upon the City's excellent human rights track record.

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## **SIGNATURE**

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City Manager

## **ATTACHMENT**

Appendix 1: City of Toronto Accommodation Policy