

Response to EX26.14 Reviewing City of Toronto Policies Governing the Use of Libraries and City Facilities by Individuals and Groups Promoting Intolerance or Discrimination – Progress Update

APRIL 16, 2024

Background

City Council adopted [2021.EX26.14](#) *"Reviewing City of Toronto Policies Governing the Use of Libraries and City Facilities by Individuals and Groups Promoting Intolerance or Discrimination"* directing staff from different City Divisions to:

1. **Review** booking policies, procedures, guidelines, terms/conditions and complaints processes to ensure compliance and alignment with relevant corporate human rights policies.
2. **Track** divisional complaints and resulting enforcement actions as well as instances of alleged hate activity or discrimination that result in permits being denied or revoked.
3. **Develop** procedures to strengthen permitting administration; such procedures should include staff training and increased communications and awareness, to the public, of existing policies.
4. **Work with** respective City divisions to review City-owned properties with an equity lens to promote Two-Spirit, Lesbian, Gay, Bisexual, Transgender and Queer inclusion.
5. **Consult** back with the 2SLGBTQ+ Advisory Committee, as necessary, and report back on progress.

Overview of City Permits

Use of City spaces is permitted by various divisions, principally:

- Parks, Forestry & Recreation (PFR)
 - Corporate Real Estate Management (CREM)
 - Economic Development & Culture (EDC)
 - Transportation Services (TS)
- Different Divisions have jurisdiction over various City spaces, some examples are listed on this slide.
 - These activities are underpinned by the City's anti-harassment and anti-discrimination policies, and residents' Charter rights.
 - When issuing permits, staff must consider the requirement for Toronto's civic spaces to be safe, accessible, and politically neutral.

DIVISION	Examples of Permitted Spaces
PFR	Community Recreation Centres, park amenities
CREM	Spaces at City Hall (CH), Metro Hall (MH), Civic Centers (CCs), St. Lawrence Market (SLM), and Union Station (US)
EDC	Museums and Cultural Centres (i.e. Assembly Hall, Clark Centre for the Arts, Spadina Museum, Colborne Lodge)
TS	Street Events (public right-of-way)

PFR Progress

- PFR has updated its [webpage](#) to prominently display:
 - The City's Vision Statement on Access, Equity and Diversity.
 - Terms and Conditions of use, including: the City's *Hate Activity Policy* and *Declaration of Compliance with the City's Anti-Harassment Discrimination Legislation*.
- PFR has worked to align its facility booking policies and processes with the City's corporate human rights policies, including procedures outlined within the City's Hate Activity Policy.
- All PFR permit holders are required to sign a Declaration of Compliance with the City's Anti-Harassment Discrimination Legislation.
- A Divisional complaint tracking process is posted on PFR's website. Suspensions and bans are tracked internally.

PFR Next Steps

- PFR has updated its permit application procedures to detail how staff can escalate concerns, and how the Division might deny or revoke a permit consistent with City Hate Activity Policy and Procedures.
- These instances may include situations where it could be reasonable to believe that use of a PFR facility by an individual or group is likely to promote, or would have the effect of promoting discrimination, contempt, or hatred of any kind.
- PFR has also updated its Suspension and Ban Policy, which will be made publicly available, to ensure clear expectations regarding public behaviour and consequences for inappropriate patron behaviour; the updated policy will be rolled out in 2024.

CREM Progress

- CREM reviewed facility booking policies, procedures, terms/conditions, and complaints processes for CH, MH, and CCs and confirmed compliance with the City of Toronto's relevant corporate policies
- CREM Facility Event Coordinators are assigned to and identified at CH, MH, and CCs and can be contacted about any complaints. Staff are trained on the divisional issue-escalation process and will act accordingly. Records are maintained to track and monitor complaints and response actions.

A **"Civic Centre Public Space Account"** is required to book at City Hall, Metro Hall, and Civic Centers.

Interested parties must complete and submit a detailed application form to apply for a Civic Centre Public Space Account.

Organizations eligible to apply must be registered and verifiable as one of the following types: Registered Charity, Not-for-Profit, Government, Community Organization, Agency, or Corporation.

Before granting the booking account, CREM staff will review and verify all submissions. Incomplete or incompatible applications will be denied.

Applicants need to sign forms agreeing to adhere to CoT Equity, Diversity, and Inclusion policies during the initial and every subsequent booking.

CREM Next Steps

- CREM is working to enhance staff training related to the City of Toronto's Vision Statement on Access, Equity, and Diversity, beginning with the "Toronto for All Foundations" curriculum, which is mandatory for all CREM staff. This curriculum supports the advancement of reconciliation, building and maintaining an equitable and inclusive workplace to serve our city's diverse communities better.
- CREM will coordinate with the Customer Experience Division (CXD) to adopt this action. An external consultant will be hired to perform the review.
- CREM's process reviews for the event spaces at SLM and US are underway to ensure alignment with the relevant corporate policies.

EDC Progress

- EDC has reviewed facility booking policies and processes and can confirm alignment with the City's corporate Human Rights policies, including the Hate Activity Policy.
- EDC is updating the permit booking webpages for Museums and Cultural Centres to display prominently: the City's [Vision Statement on Access, Equity and Diversity](#) and the Terms and Conditions of use of the facilities including the [Human Rights and Anti-Harassment/Discrimination Policy](#) and [Hate Activity Policy](#).
- EDC ensures that permit holders and facility users review and sign a Declaration of Compliance with Anti-Harassment/Discrimination Legislation.
- EDC staff use an Equity Lens Tool to identify and address barriers to participation in divisional programming.
- EDC's complaint/compliment tracking process was reviewed; public feedback is tracked via an online process, and at site levels, via complaint logs that are reviewed regularly by management.
- At EDC-managed sites, Codes of Conduct are posted at facility entrances to support staff and clients.
- All EDC staff attended mandatory Toronto for All training, including anti-oppression and / or 2SLGBTQIA+-focused learning.

EDC Next Steps

- Drawing from consultations with equity-deserving populations including 2SLGBTQ+ individuals and communities, EDC will work to better support the public and IBPOC populations through the division's new *Action Plan for Toronto's Culture Sector*, which is a ten-year strategic plan expected to launch in Q4 2024.
- EDC will work with Legal and the division's GM to adopt a Suspension and Ban Policy on the PFR precedent to provide the public with clear expectations around client behaviour and the consequences for inappropriate behaviour at EDC sites.
- Arts and Culture Services and Museum and Heritage Services have identified the need to develop a policy to govern community-use of EDC-managed space to further reduce barriers for equity-deserving communities.
- In 2024, EDC will conduct a review of the Codes of Conduct signage at each site to better align content with the City's corporate Human Rights policies, including the Hate Activity Policy.
- EDC staff will work with Strategic Public & Employee Communications (SPEC) to update all EDC facility booking webpages to prominently position: the City's [Vision Statement on Access, Equity and Diversity](#) and the Terms and Conditions of use of the facilities including the [Human Rights and Anti-Harassment/Discrimination Policy](#) and [Hate Activity Policy](#).

TS Progress

- ❑ **WEBSITE UPDATES:** TS is updating the Street Event Permits web page to feature the City's:
 - ❑ [Vision Statement on Access, Equity and Diversity](#)
 - ❑ [Human Rights and Anti-Harassment/Discrimination Policy](#)
 - ❑ [Hate Activity Policy](#)
- ❑ **TRAINING PROGRAMS:** All TS staff are mandated to complete the "Toronto for All Foundations" learning program; and additionally encouraged to participate in activities and build awareness of equity-deserving communities year-round (i.e., Black History Month, International Women's Day, Pride, etc.).
- ❑ **STRATEGIC EQUITY WORK:** Implementing a policy framework that supports the City's commitments to various corporate equity initiatives (i.e. Gender Equity Strategy) and the launch of our divisional REDI plan (**R**econciliation, **E**quity, **D**iversity and **I**nclusion) with a key focus on building equity in our decision-making processes.

TS Next Steps

- ❑ **PROCEDURAL UPDATES:** TS will update its permit application procedures to detail how the Division may deny or revoke a permit based on the City's Hate Activity Policy and the criteria that are consistent with that Policy.
- ❑ **WEBSITE UPDATES:** TS will update its website to illustrate how the Division will deny a request for road closure if the application does not comply with the [Human Rights and Anti-Harassment/Discrimination Policy](#) and [Hate Activity Policy](#).
- ❑ **COMPLAINT TRACKING PROCESS:** TS has reviewed the divisional complaint tracking process and is exploring the possibility of incorporating a link to the City's Human Rights Complaints website.
- ❑ **APPLICATION AMENDMENTS:** TS will collaborate with City's Legal Services to explore the integration of a prompt for applicants to sign the [Declaration of Compliance with Anti-Harassment/Discrimination Legislation and City Policy](#).

Questions for discussion

- 1) How else could City facility permit processes help to ensure that community members feel safe when using City spaces?
- 2) How could we better engage the 2SLGBTQ+ community to inform EDC's facility permitting services?
- 3) "How can we support the 2SLGBTQ+ community in the City's transportation network broadly?"

Questions for discussion

- 4) In addition to completing the "Toronto for All Foundations" training program, what other training can the Committee recommend staff complete to promote the City of Toronto's Vision Statement on Access, Equity, and Diversity?
- 5) Are there any low-cost changes to City facilities that the Committee recommends to promote access, equity, and diversity better?

Thank you!

Divisional Contacts

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TS: Antonia Markos, Director of Permits and Enforcement