

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

SEPTEMBER 23, 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** with the 2SLGBTQ+ Advisory Committee 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)

Parks, Forestry & Recreation

- PFR has updated its webpage to prominently display:
 - the City's [Vision Statement on Access, Equity and Diversity](#)
 - the Terms and Conditions of use of the facilities including the [Human Rights and Anti-Harassment/Discrimination Policy](#) and [Hate Activity Policy](#).
- 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.

Parks, Forestry & Recreation

- 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 is 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.

Corporate Real Estate Management

- CREM reviewed facility booking policies, procedures, terms/conditions, and complaints processes for City Hall, Metro Hall, and Civic Centers and confirmed compliance with the City of Toronto's relevant corporate policies
- CREM Facility Event Coordinators are assigned to and identified at City Hall, Metro Hall, and Civic Centers 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.

Corporate Real Estate Management

- CREM has enhanced 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 better serve our city's diverse communities.
- 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.

Economic Development & Culture

- EDC reviewed facility booking policies and processes and can confirm alignment with the City's corporate Human Rights policies, including the Hate Activity Policy.
- Webpages for Museums and Cultural Centres will prominently display:
 - the City's [Vision Statement on Access, Equity and Diversity](#)
 - 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.
- Complaint 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.
- 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.

Economic Development & Culture

- 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 plans 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.

Transportation Services

- Street Event Permits web page will feature the City's [Vision Statement on Access, Equity and Diversity, Human Rights and Anti-Harassment/Discrimination Policy](#) and [Hate Activity Policy](#).
- Transportation staff complete the "Toronto for All Foundations" learning program; and are encouraged to build awareness of equity-deserving communities year-round through learning activities.
- Developed policy framework supports the City's commitments to various corporate equity initiatives (i.e. Gender Equity Strategy) and through the launch of divisional REDI plan:
 - (**R**econciliation, **E**quity, **D**iversity and **I**nclusion) with a key focus on building equity in the Division's decision-making processes.

Transportation Services

- Transportation Services will update its permit application procedures to detail how the Division may deny or revoke permits, based criteria consistent with the City's Hate Activity Policy.
- Divisional website outlines the permit denial process for road closure applications that do not comply with the [Human Rights and Anti-Harassment/Discrimination Policy](#) and [Hate Activity Policy](#).
- Divisional complaint tracking processes have been reviewed, and Transportation is exploring the possibility of incorporating a link to the complaints page on the City's Human Rights Office website.
- Transportation is working to integrate a prompt for applicants to sign the [Declaration of Compliance with Anti-Harassment/Discrimination Legislation and City Policy](#) online.

Questions

- 1) How else can City teams support engagement with 2SLGBTQ+ communities to inform facility permitting services and to ensure that community members feel safe when using City spaces?
- 2) In addition to completing the "Toronto for All Foundations" training program, what other training can Committee members recommend to promote the City of Toronto's Vision Statement on Access, Equity, and Diversity?

Thank you!

Divisional Contacts

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TS: Antonia Markos, Director of Permits and Enforcement