



POLICY PAPER

Addressing Racism & Religious Discrimination

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ABOUT OUSA

OUSA represents the interests of 150,000 professional and undergraduate, full-time and part-time university students at eight student associations across Ontario. Our vision is for an accessible, affordable, accountable, and high quality post-secondary education in Ontario. To achieve this vision we've come together to develop solutions to challenges facing higher education, build broad consensus for our policy options, and lobby the government to implement them.

The member institutions and home office of the Ontario Undergraduate Student Alliance operate on the ancestral and traditional territories of the Attawandaron (Neutral), Haudenosaunee, Huron-Wendat, Leni-Lunaape, Anishnawbek, and Mississauga peoples.

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OUSA policy papers are written by students to articulate student concerns and offer student-driven solutions for accessible, affordable, accountable, and high quality post-secondary education in the province.

To support our policies and ensure that we are effectively representing undergraduate and professional students at Ontario's universities, students and student groups from each of our eight member institutions were consulted to provide guidance and feedback on the principles, concerns, and recommendations contained herein.

OUSA would like to thank students and student groups from Brock University, Laurentian University, McMaster University, Queen's University, Trent University Durham GTA, the University of Waterloo, Western University, and Wilfrid Laurier University for their valuable contributions to this policy paper.

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GLOSSARY

The following definitions and concepts are used to inform this policy paper. While we recognize that terminology is fluid and varies across time and by the intent of the writer or speaker, it was important to choose standardized definitions to ensure consistency in how this paper is interpreted. We have chosen the language and definitions intentionally based on general appropriateness and understanding at the time this policy paper was written, a commitment to demonstrating respect, and an intention to challenge harmful or stereotypical narratives. However, in some cases the terminology used is a recommendation rather than a rule, specifically where it is used to identify a person or group. In such cases, it is most appropriate to use the terminology preferred by the person or group identified.

Anti-Asian racism: Anti-Asian racism is the latent or overt hostility or hatred directed towards, or discrimination against individual Asian people or individuals perceived as Asian, Asian communities, their ethnicities, and/or their cultural, linguistic, and historical heritage. Anti-Asian racism is similar to Sinophobia, but is a broader term to capture a variety of ethnicities, nationalities, and experiences, highlighting that East and Southeast Asian communities are often lumped together and face similar experiences of racism.¹

Anti-Black racism: “Anti-Black racism is prejudice, attitudes, beliefs, stereotyping and discrimination that is directed at people of African descent and is rooted in their unique history and experience of enslavement. Anti-Black racism is deeply entrenched in Canadian institutions, policies and practices, such that anti-Black racism is either functionally normalized or rendered invisible to the larger white society. Anti-Black racism is manifested in the legacy of the current social, economic, and political marginalization of African Canadians in society such as the lack of opportunities, lower socio-economic status, higher unemployment, significant poverty rates and overrepresentation in the criminal justice system.”²

Anti-Indigenous racism: “Anti-Indigenous racism is the ongoing race-based discrimination, negative stereotyping, and injustice experienced by Indigenous Peoples within Canada. It includes ideas and practices that establish, maintain and perpetuate power imbalances, systemic barriers, and inequitable outcomes that stem from the legacy of colonial policies and practices in Canada.”³

Anti-racism: “Anti-racism is about taking proactive steps to fight racial inequity. It’s different from other approaches that focus on multiculturalism or diversity because it acknowledges that systemic racism exists and actively confronts the unequal power dynamic between groups and the structures that sustain it. Anti-racism involves consistently assessing structures, policies and programs, and through monitoring outcomes, ensuring they are fair and equitable for everyone.”⁴

Antisemitism: Latent or overt hostility or hatred directed towards, or discrimination against individual Jewish people or the Jewish people for reasons connected to their religion, ethnicity, and their cultural, historical, intellectual and religious heritage.⁵

Black, Indigenous, and People(s) of Colour (BIPOC): Black, Indigenous, and People(s) of Colour is one of the preferred terms used to describe people collectively. It is used by some to be inclusive and account for the erasure of Black and Indigenous people and their unique experiences of colonization and slavery.⁶ Throughout this paper, both “Black, Indigenous, and People(s) of Colour” and “racialized

¹ There is currently no formalized definition of anti-Asian racism. The definition provided here, as written by OUSA delegates, offers a starting point, although OUSA recommends that the Ontario Human Rights Commission develop a formalized definition.

² Government of Ontario, *Data Standards for the Identification and Monitoring of Systemic Racism* (Government of Ontario, updated November 19, 2020), “Glossary,” <https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>.

³ *Ibid.*

⁴ Government of Ontario, *A Better Way Forward: Ontario’s 3-Year Anti-Racism Strategic Plan* (Queen’s Printer for Ontario, 2017), 11.

⁵ Government of Ontario, *Data Standards for the Identification and Monitoring of Systemic Racism*.

⁶ Sandra E. Garcia, “Where Did BIPOC Come From?,” *New York Times*, June 17, 2020, <https://www.nytimes.com/article/what-is-bipoc.html>; “Black, Indigenous, People(s) of Colour (BIPOC): Inclusive and antiracist writing,” *Simon Fraser University Library*, n.d., <https://www.lib.sfu.ca/about/branches-depts/slc/writing/inclusive-antiracist-writing/bipoc>; Crystal Raypole, “Yes, There’s a

person” or “racialized group” are used when it is necessary to describe people collectively, recognizing that some students may not identify with one term, but may identify with the other.

Constructive discrimination: A type of racial discrimination, “[c]onstructive discrimination arises when a neutral requirement, qualification or factor has an adverse impact on members of a group of persons who are identified by a prohibited ground of discrimination under the [Ontario Human Rights] Code.”⁷

Covert racism: “Compared to overt racism, covert racism is subtler and often difficult to observe. It’s often hidden in the fabric of society, where racist actions are either passive or ambiguous. Those who commit this act of racism rationalized these with reasons that society is more willing to believe...covert racism manifests itself in social structures and processes that it’s often hard to identify. This is because covert racism tends to subtly manipulate the victims, making them think that the action or decision is in their favor.”⁸

Creed: “Creed is interpreted to mean “religious creed” or “religion.” It is defined as a professed system and confession of faith, including both beliefs and observances or worship. A belief in a God or gods, or a single supreme being or deity is not a requisite. Religion is broadly accepted by the OHRC to include, for example, non-theistic bodies of faith, such as the spiritual faiths/practices of [Indigenous] cultures, as well as bona fide newer religions (assessed on a case by case basis). The existence of religious beliefs and practices are both necessary and sufficient to the meaning of creed, if the beliefs and practices are sincerely held and/or observed.”⁹

Cultural safety: “A culturally safe environment is physically, socially, emotionally, and spiritually safe. There is recognition of and respect for the cultural identities of others, without challenge or denial of an individual’s identity, who they are, or what they need. Culturally unsafe environments diminish, demean, or disempower the cultural identity and well-being of an individual.”¹⁰

Decolonization: “Decolonization itself refers to the undoing of colonial rule over subordinate countries but has taken on a wider meaning as the ‘freeing of minds from colonial ideology’ in particular by addressing the ingrained idea that to be colonised was to be inferior.”¹¹ In the context of academia, it “is often understood as the process in which we rethink, reframe and reconstruct the curricula and research that preserve the Europe-centred, colonial lens. It should not be mistaken for “diversification”, as diversity can still exist within this western bias.”¹² Decolonization goes further and involves actively resisting and unlearning the dangerous and harmful legacy of colonization, particularly the racist idea that the worldviews and knowledge systems of Black, Indigenous, and People of Color (BIPOC), are inferior to those of white Europeans.

Equality: “[E]quality means that all segments of society have the same level of support and opportunity. This means that regardless of one’s gender, race, sex, religion, etc., opportunities remain the same. It ensures that people in different social statuses or groups will not be discriminated against.”¹³

Difference Between ‘BIPOC’ and ‘POC’ – Here’s Why it Matters,” *Healthline*, September 17, 2020, <https://www.healthline.com/health/bipoc-meaning>.

⁷ Ontario Human Rights Commission, *Policy on creed and the accommodation of religious observances* (Ontario Human Rights Commission, 2009).

⁸ “Overt Racism vs Covert Racism – Understand Meanings and implications,” Diversity for Social Impact, accessed March 19, 2021, online: <https://diversity.social/covert-overt-racism/>.

⁹ Ontario Human Rights Commission, *Policy on creed and the accommodation of religious observances*.

¹⁰ Government of Ontario, *Data Standards for the Identification and Monitoring of Systemic Racism*.

¹¹ “What is decolonising methodology?,” *Warwick Education Studies*, revised March 15, 2018,

<https://warwick.ac.uk/fac/soc/ces/research/current/socialtheory/maps/decolonising>.

¹² “What does decolonising mean?,” *London Metropolitan University*, accessed April 6, 2021,

<https://www.londonmet.ac.uk/about/equity/centre-for-equity-and-inclusion/race/decolonising-academia/what-does-decolonising-mean/>.

¹³ “Equity vs Equality and How They Are Different,” *University of the People*, accessed April 6, 2021,

<https://www.uopeople.edu/blog/equity-vs-equality/>.

Equity: Equity is a “condition or state of fair, inclusive, and respectful treatment of all people. Equity does not mean treating people the same without regard for individual differences.”¹⁴ “[E]quity refers to the fact that different people have varying needs of support and assistance...The goal of equity is to help achieve fairness in treatment and outcomes.”¹⁵

Hate speech: Hate speech—as defined by Canadian law—includes any speech that is not protected as freedom of expression. It includes, but is not limited to: threats of violence, hate speech as defined by *R v Keegstra*, direct harassment of an individual or individuals, threats to the physical security of an individual or community, violation of privacy consistent with *Freedom of Information and Protection of Privacy Act*, and false defamation of an individual consistent with the *Libel and Slander Act*.

Hate rhetoric: Hate rhetoric, in this policy paper, includes hate speech as defined above, as well as “any kind of communication in speech, writing or behaviour, that attacks or uses pejorative or discriminatory language with reference to a person or a group on the basis of who they are, in other words, based on their religion, ethnicity, nationality, race, colour, descent, gender or other identity factor,”¹⁶ that may or may not be protected as freedom of expression in Canadian law.

Intersectionality: “Intersectionality is the way in which people’s lives are shaped by their multiple and overlapping identities and social locations, which, together, can produce a unique and distinct experience for that individual or group, for example, creating additional barriers, opportunities, and/or power imbalances. In the context of race and Indigenous identity, this means recognizing the ways in which people’s experiences of racism or privilege, including within any one group, may vary depending on the individual’s or group’s relationship to additional overlapping or intersecting social identities, like religion, ethnic origin, gender, age, disabilities or citizenship and immigration status. An intersectional analysis enables better understanding of the impacts of any one particular systemic barrier by considering how that barrier may be interacting with other related factors.”¹⁷

Islamophobia: “Islamophobia is racism, stereotypes, prejudice, fear, or acts of hostility towards individual Muslims or followers of Islam in general. In addition to individual acts of intolerance and racial profiling, Islamophobia leads to viewing Muslims as a greater security threat on an institutional, systemic and societal level.”¹⁸

Overt racism: “Overt racism is the most evident type of racism and the easiest to spot. This is deliberate and intentional prejudice or discriminative actions directed towards someone from a different race. These actions include but are not limited to attitude, hateful speech, gestures, and stereotyping.”¹⁹

Prejudice: “Prejudice is a strong dislike or negative feelings held by someone about another person or group; negative attitudes and stereotypes may lead to harassment and discrimination.”²⁰

Racial discrimination: (*as defined in Canadian case law*) “[A]ny distinction, conduct or actions, whether intentional or not, but based on a person’s race, which has the effect of imposing burdens on an individual or group, not imposed upon others or which withholds or limits access to benefits available to other members of society.”²¹ Racial discrimination includes, but is not limited to, prejudice, racial profiling, and constructive discrimination.

¹⁴ Ministry of Education, *Realizing the Promise of Diversity: Ontario’s Equity and Inclusive Education Strategy* (Queen’s Printer for Ontario, 2009), 4.

¹⁵ “Equity vs Equality and How They Are Different”.

¹⁶ United Nations, *Strategy and Plan of Action on Hate Speech: Synopsis* (United Nations, May 2019), <https://www.un.org/en/genocideprevention/documents/UN%20Strategy%20and%20Plan%20of%20Action%20on%20Hate%20Speech%2018%20June%20SYNOPSIS.pdf>.

¹⁷ Government of Ontario, *Data Standards for the Identification and Monitoring of Systemic Racism*.

¹⁸ Ibid.

¹⁹ “Overt Racism vs Covert Racism – Understand Meanings and implications”.

²⁰ *Human Rights At Work* (Ontario Human Rights Commission, 2008), part III, section 2, <http://www.ohrc.on.ca/en/iii-principles-and-concepts/2-what-discrimination>.

²¹ Ontario Human Rights Commission, *Policy and guidelines on racism and racial discrimination* (Ontario Human Rights Commission, 2009), 15.

Racial equity: Racial equity “[r]efers to the systemic fair treatment of all people that results in equitable opportunities and outcomes for everyone.”²²

Racial profiling: Racial profiling is “any action undertaken for reasons of safety, security or public protection that relies on stereotypes about race, colour, ethnicity, ancestry, religion or place of origin rather than on reasonable suspicion, to single out an individual for greater scrutiny or different treatment.”²³

Racialization: Racialization is “[t]he process of social construction of race...the process by which societies construct races as real, different and unequal in ways that matter to economic, political and social life.”²⁴

Racialized person or group: “Racialized person” or “racialized group” is one of the preferred terms used to describe people collectively – rather than less appropriate terms such as “racial minority,” “visible minority,” “person of colour”²⁵ or “non-white” – “as it expresses race as a social construct rather than as a description based on perceived biological traits. Furthermore, these other terms treat “white” as the norm to which racialized persons are to be compared and have a tendency to group all racialized persons in one category, as if they are all the same.”²⁶ Throughout this paper, both “racialized person” or “racialized group” and “Black, Indigenous, and People(s) of Colour” are used when it is necessary to describe people collectively, recognizing that some students may not identify with one term, but may identify with the other.

Racism: Racism is “an ideology that either explicitly or implicitly asserts that one racialized group is inherently superior to others...Racism oppresses and subordinates people because of racialized characteristics. It has a profound impact on social, economic, political and cultural life... racism exists at a number of levels, in particular (1) individual, (2) institutional or systemic, and (3) societal (also described as cultural/ideological)...*At the individual level*, racism may be expressed in an overt manner but also through everyday behaviour that involves many small events in the interaction between people. This is often described as “everyday racism” and is often very subtle in nature...*At the institutional or systemic level*, racism is evident in organizational and government policies, practices, and procedures and “normal ways of doing things” which may directly or indirectly, consciously or unwittingly, promote, sustain, or entrench differential advantage for some people and disadvantage for others...*At a societal level*, racism is evident in cultural and ideological expressions that underlie and sustain dominant values and beliefs. It is evident in a whole range of concepts, ideas, images and institutions that provide the framework of interpretation and meaning for racialized thought in society.”²⁷

Religion: “Religion is any religious denomination, group, sect, or other religiously defined community or system of belief and/or spiritual faith practices.”²⁸

Retraumatization: Retraumatization is “[a] conscious or unconscious reminder of past trauma that results in a re-experiencing of the initial trauma event. It can be triggered by a situation, an attitude or expression, or by certain environments that replicate the dynamics (loss of power/control/safety) of the original trauma.”²⁹

²² *A Better Way Forward: Ontario’s 3-Year Anti-Racism Strategic Plan*, 55.

²³ Ontario Human Rights Commission, *Policy and guidelines on racism and racial discrimination*, 19.

²⁴ *Ibid*, 11.

²⁵ While “person of colour” is a less preferred term, it is considered appropriate when saying Black, Indigenous, and *People of Colour* (BIPOC).

²⁶ Ontario Human Rights Commission, *Policy and guidelines on racism and racial discrimination*, 12.

²⁷ *Ibid*, 12-13.

²⁸ Government of Ontario, *Data Standards for the Identification and Monitoring of Systemic Racism*.

²⁹ Karen Zgoda, Pat Shelly, and Shelley Hitzel, “Preventing Retraumatization: A Macro Social Work Approach to Trauma-Informed Practices & Policies,” *The New Social Worker*, accessed March 30, 2021, <https://www.socialworker.com/feature-articles/practice/preventing-retraumatization-a-macro-social-work-approach-to-trauma-informed-practices-policies/>.

Sinophobia: Sinophobia is a “well-documented phenomenon that has existed for centuries... fueled by superficial stereotypes of [Chinese people] as dirty and uncivilized.”³⁰ It is the latent or over hostility or hatred directed towards, or discrimination against individual Chinese people, the Chinese community, their ethnicities, and/or their cultural and historical heritage.³¹ Sinophobia has become increasingly prevalent “due to the media coverage of the coronavirus.”³²

Stereotypes: Stereotypes are “[q]ualities ascribed to individuals or groups that are based on misconceptions, false generalizations, and/or oversimplifications that potentially result in stigmatization. A race-based stereotype is a quality ascribed to individuals/groups related to race. Stereotypes can perpetuate racism and racial discrimination and give rise to racial inequalities.”³³

Underrepresented Students, Students from Underrepresented Groups: Underrepresented students are students from demographic groups that have a lower percentage of participation in post-secondary education when compared to the percentage of participation in post-secondary of the general population. For the context of this paper, “underrepresented” should be understood only in the context of participation in postsecondary education, not other aspects of society. It is important to note that, while some marginalized populations may be underrepresented within the post-secondary system, the terms “marginalized” and “underrepresented” are not synonymous and are not used interchangeably in this paper. In particular, policy makers often refer to underrepresented groups in post-secondary education as including: those from low-income families; first-generation students, those from rural and northern communities, those from single-parent families, or those with disabilities, among other marginalized populations.

Visible minority: Visible minority is a term used by Statistics Canada and the Government of Canada. It is defined as “persons, other than Aboriginal peoples, who are non-Caucasian in race or non-white in colour.”³⁴ This is not appropriate terminology, nor does it reflect the global reality in some Canadian cities, and will therefore only be used in instances where it is necessary to reflect specific research.

Xenophobia: Xenophobia “describes attitudes, prejudices or behaviour that reject, exclude and often vilify persons based on the perception that they are outsiders or foreigners to the community, society or national identity. Put simply, it is generally understood as an attitudinal orientation of hostility against those considered non-natives in a given population. Although racism and xenophobia are distinct phenomena, they often overlap.”³⁵

³⁰ Tessa Wong, “Sinophobia: How a Virus Reveals the Many Ways China is Feared,” *BBC News, Singapore*, February 20, 2020, <https://www.bbc.com/news/world-asia-51456056>.

³¹ *The American Heritage Dictionary*, 5th ed. (Houghton Mifflin Harcourt Publishing, 2020), s.v. “Sinophobic,” <https://ahdictionary.com/word/search.html?q=Sinophobic>.

³² Serkan Aydin, “Why Universities Need to Actively Combat Sinophobia,” *University World News*, June 20, 2020, <https://www.universityworldnews.com/post.php?story=20200616105836478>.

³³ Government of Ontario, *Data Standards for the Identification and Monitoring of Systemic Racism*.

³⁴ “Visible minority of person,” *Statistics Canada*, accessed April 6, 2021, <https://www23.statcan.gc.ca/imdb/p3Var.pl?Function=DEC&Id=45152>.

³⁵ *International Migration, Racism, Discrimination and Xenophobia* (International Labour Office, International Organization for Migration, and Office of the United Nations High Commissioners for Human Rights, 2001), 2, <https://www2.ohchr.org/english/issues/migration/taskforce/docs/wcar.pdf>.

EXECUTIVE SUMMARY

The pervasiveness, severity, and systemic nature of racism and religious discrimination at post-secondary institutions necessitates a comprehensive, province-wide framework that not only seeks to prevent and respond to instances of racism and religious discrimination but that also targets the racial and religious inequities embedded in post-secondary structures. Everyone deserves to be able to safely pursue their education, yet racialized and religious students have consistently shared experiences and concerns about the ways in which institutional and provincial policies and practices infringe on their ability to do so. This policy paper offers a foundation for a comprehensive, province-wide framework that is student-driven and reflective of the persistent and ongoing advocacy of students across the province who have been calling for racial and religious equity at their institutions so that they can be safe and thrive.

THE PROBLEM

Gaps in Provincial Legislation

Students are concerned about the lack of widespread action to build racial and religious equity and address racism and religious discrimination across the post-secondary education sector, and have highlighted that not all post-secondary institutions have a standalone policy that includes practices to create an equitable environment and address racism and religious discrimination.

Barriers to Access and Transition

Students are concerned about barriers to accessing and transitioning into post-secondary education for racialized and religious students. Specifically, they are concerned that racialized students disproportionately face financial and non-financial structural barriers to post-secondary education as a result of inadequate access to information about financial aid, income inequality, and labour market discrimination. For example, Black and Indigenous students are disproportionately encouraged to choose applied courses or programs during the course of, and after, their high school career, which limits their opportunities for success in post-secondary education; racialized students from low-socioeconomic backgrounds can face labour market discrimination that impacts their earnings and their ability to pay off student debt they may have; and OSAP currently fails to address the financial barriers that students face before they are in school. Existing government policies designed to improve access to higher education have done little to achieve equitable access to post-secondary institutions for underrepresented students. Additionally, students in the transfer process from religious post-secondary institutions to publicly-assisted post-secondary institutions face social difficulties when navigating the two different systems, as well as difficulties having their course credits recognized when transferring to a publicly-assisted post-secondary institution.

Many racialized students – including international students, students who are immigrants or children of immigrants, first generation students, and Indigenous students – as well as some religious students, face significant and often location-specific financial and non-financial barriers to adjusting to post-secondary education and gaining a sense of belonging upon entry. This is concerning as students from underrepresented and marginalized populations may choose not to attend post-secondary education because of fears of discrimination and lack of programming, staff, and social support. Students are concerned that some racialized student populations face lower retention rates, which may be due to discrimination and lack of support. They are concerned that racialized students – especially international students, students who are immigrants or children of immigrants, first generation students, and Indigenous students – may find it more difficult to find peer support networks and role models upon entry to post-secondary education. Additionally, there have been few evaluations of existing transition/bridging programs in Ontario and little research conducted on the effective design of these programs to support racialized students; there is a lack of funding for existing programs; they may be ineffective because of a lack of partnerships with secondary school and community networks; and current and prospective post-secondary students may be unaware of existing programs.

Racism and Discrimination in Academia

Academia in its present form is a result of colonization, and a failure to decolonize academia upholds the racist belief that the cultures and knowledge systems of Black, Indigenous, and People of Colour are inferior, and that they do not have value in academic spaces. Students understand that a failure to objectively confront the harmful and dangerous legacy of colonization stifles the success of Indigenization efforts within the post-secondary education system and thwarts efforts to develop all students' racial literacy; and that a failure to objectively confront the harmful and dangerous legacy of colonization can have a traumatic impact on Indigenous students. They also recognize that mandatory equity training may result in retraumatization for Black, Indigenous, and People of Colour.

Students are concerned that Black and Indigenous full-time faculty and senior leadership are severely underrepresented in post-secondary institutions. The unique or exacerbated barriers to accessing post-secondary education for Black and Indigenous students can hinder equitable representation, and Black, Indigenous, and People of Colour face barriers to attaining tenured positions. Additionally, the considerable absence of race-based data in post-secondary institutions severely hampers efforts to address systemic racism and stifles the effectiveness of policies, programs, and services developed for Black, Indigenous, and People of Colour.

Students are further concerned about the use of racial slurs and other expressions of hate speech in academic settings, course content, and learning materials, which may induce adverse physiological and psychological effects on students that identify as Black, Indigenous, or People of Colour; and, regardless of the context in which they are used, may create a hostile academic environment for students. Students are concerned that degree requirements for mandatory Indigenous credits may breed resentment in the student community as well as about the instances where academic freedom has been a veil to project racial animus in academic settings.

Gaps and Concerns with Student Supports

Students are concerned that existing student support services are insufficient to address student needs, and that they can be harmful to racialized students who disproportionately experience both covert and overt racism in their interactions with student support services on campus. The lack of research on student interactions and experiences with student support services on post-secondary campuses undermines post-secondary institutions' ability to effectively identify, validate, and address concerns that racialized and religious students face in their interactions with student support services on campus. Students are concerned about the lack of mandatory equity, diversity, and inclusion training provided to student-facing post-secondary staff and funding for services that provide support specifically to racialized and religious students. As a result, they are worried that student groups and clubs have been forced to bear the weight of providing sufficient support to racialized and religious students. Students are particularly concerned about the inadequate and inconsistent funding for Indigenous Student Centres on their campuses.

Students are concerned, specifically, about available health care services, recognizing that racialized and religious students often face implicit bias when accessing health care services when compared to their peers. Students are concerned because Black, Indigenous, and People of Colour disproportionately face significant physical and mental health outcomes, compounded by systemic barriers to accessing health services and resources, and there is a lack of research available on racialized students' interactions and experiences with health care services on post-secondary campuses. Students are concerned that racialized and religious students face difficulties obtaining a standardized level of mental health care due to non-racialized and untrained counsellors lacking an understanding of cultural or religious factors that may be at play. They are further concerned with the lack of Black and Indigenous medical professionals which exacerbates the lack of understanding of the effects of systemic racism on Black, Indigenous, and students of colour, and recognize that professional underrepresentation is partially influenced by the fact that Black and Indigenous students in health care programs may experience racism from students and instructors, and in course content, and lack adequate support.

Racism, Discrimination, and Exclusion on Campus

Students are concerned about the upsurge in Islamophobia, antisemitism, Xenophobia, anti-Asian racism, and anti-Black racism across Canada which leaves many students vulnerable to bullying, threatening behaviour, and violence. However, they recognize there is a lack of research on religious discrimination, in particular Islamophobia and antisemitism, as well as anti-Asian racism and Sinophobia, and their effects in both post-secondary institutions and wider society. They are concerned that ‘positive’ stereotypes and the model minority myth can be used to deny the existence of anti-Asian racism, and the lack of research surrounding the impact of the model minority myth on both ‘model minorities’ and other racial minority groups leave institutions ill-equipped to tackle this specific manifestation of racism. They are particularly concerned about the sharp increase in Sinophobia and anti-Asian racism, particularly toward Chinese international students, due to Western language and media surrounding the COVID-19 pandemic.

Students are also concerned about the discrimination and exclusion experienced by students who observe religious and/or cultural practices. They are concerned because there is a lack of institutional clarity, support, and enforcement of the duty to accommodate which creates inconsistency in access to accommodations for religious and cultural practices, and leads to instructors using individual discretion when responding to accommodation requests. Additionally, there is no clear institution-specific guidance on how to apply *Ontario Human Rights Code* policies and principles to institutional policies on accommodations and inclusiveness for religious and cultural practices, resulting in inconsistent, unclear, or insufficient accommodations that may contradict the *Ontario Human Rights Code*. Students are concerned that some institutional policies or campus/cultural expectations place the onus on students to seek out and request religious and/or culturally-based accommodations from individual instructors for the following reasons: some instructors and administrators may not be familiar with their legal requirements to accommodate students; some instructors may not know what resources are available on their campus to support accommodations; and not all students feel comfortable contacting faculty and staff to request accommodations due to lack of institutional clarity regarding accommodations and fear of instructors being discriminatory or not honouring reasonable requests. Students are additionally concerned that post-secondary institutions may not provide physical spaces for students to observe certain religious and cultural practices and that students may feel uncomfortable or targeted on campus due to the observation of religious and cultural practices.

Concerns with Special Constables and Campus Security

Students are concerned about special constables and security on their campuses as there have been several recent investigations into special constables and campus security engaging in racial profiling and discriminatory practices, and racialized students and students from other marginalized groups report feeling unsafe and threatened around campus security personnel or special constables. Additionally, special constable systems in Ontario work closely with, and are often governed by, local police, many of which have been investigated for racial profiling and other discriminatory practices. Students are concerned that there is minimal research to show the effectiveness of campus security and/or special constables on campus, and that the allocation and breakdown of institutional funding to campus security systems may be unclear and inaccessible to students and the public.

Lack of Institutional Accountability

Students are concerned about the lack of institutional accountability to address racism and religious discrimination. They are concerned that post-secondary institutions are not doing enough to proactively build racial and religious equity at their institutions and that the racial and religious equity work that post-secondary institutions do conduct is often poorly resourced, only addresses surface-level concerns, and does not address underlying systemic issues. They are further concerned about the limited options for recourse from a neutral third party when an act of racial or religious injustice occurs. Students are concerned that post-secondary institutions are not adequately prioritizing conducting and funding equity work on their campuses and that they rely on the unpaid labour of racialized students and faculty to conduct equity work.

Additionally, students are concerned that many post-secondary institutions and processes in post-secondary education do not collect equity-based data, that there is no standard for equity-based data collection in post-secondary education, and that the Data Standards for the Identification and Monitoring of Systemic Racism do not require data collection at regular intervals. They are concerned because there is a lack of research on the scope and impact of racial and religious trauma in Ontario post-secondary education.

Racism, Discrimination, and Exclusion in the Community

Finally, students are concerned about their experiences of covert and overt racism or religious discrimination in their community, especially as students moving to a new area for university may experience a shift in culture and may lack knowledge of community resources. Students are concerned that the provincial government is not adequately prioritizing work to reduce the effects of overt, covert and systemic racism in Ontario, and failure to actively prioritize anti-racism work creates a harmful community environment which can be especially detrimental to the wellbeing of young people. Additionally, students recognize that existing crisis response services in the communities surrounding post-secondary institutions may be ineffective as a result of gaps in law enforcement training and lack of comprehensive community-based crisis response services. They are concerned that racialized students and students from other marginalized groups report feeling unsafe and threatened around police and other law enforcement personnel and that many local police services, in the communities surrounding post-secondary institutions, have been investigated for racial profiling and other discriminatory practices.

Students are also concerned about their experiences with covert and overt racism or religious discrimination when seeking housing. They report experiencing racism or religious discrimination when searching for housing and feel they have limited options for recourse. They are particularly concerned that students, including international students, may not access human rights resources if they are unavailable in their preferred language.

Students are further concerned about their experiences with covert and overt racism or religious discrimination when searching for employment or while working and for those that do experience racism or religious discrimination while seeking or during employment, students are concerned that they may not be aware of their options for recourse. Additionally, employers may not have strong equity, diversity, and inclusion practices in their hiring processes.

RECOMMENDATIONS

Provincial Legislation

Students recommend that the provincial government amend the *Ministry of Training, Colleges and Universities Act* to require all post-secondary institutions to have a standalone racial and religious equity policy. This should be accompanied by a regulation setting out requirements with regard to the content of racial and religious equity policies at post-secondary institutions, including a mandate that post-secondary institutions create their own equity, diversity, and inclusion action plans that address and evaluate student recruitment strategies and faculty and student-facing staff hiring practices, with emphasis on the recruitment of Black, Indigenous, and other underrepresented People of Colour. Students ask that the provincial government strike an advisory committee of racialized and religious students, faculty, staff, administrators, and community leaders in the creation of this legislation and regulation.

Enhancing Access and Supporting Transition

To support access to post-secondary education, the Ministry of Education and the Ministry of Colleges and Universities (MCU) should work together to reform their current policies on equitable access to higher education and increase resources, including, but not limited to, funding and supports, to improve access to post-secondary education for underrepresented students instead of solely focusing on expanding overall post-secondary enrollment. Additionally, the Ministry of Education should develop and implement income-targeted enrichment programs throughout students' primary and secondary education to ensure

that underrepresented groups have equitable access to high-quality supplementary support with regard to post-secondary education. Students also ask that the provincial government work with relevant stakeholders to conduct studies on systemic racism across campuses and establish best practices for equitable and inclusive teaching practices to combat the effects of systemic racism and implicit racial bias that affects some racialized students, especially Black and Indigenous students, within the primary and secondary education system. They should also reintroduce the Ensuring Equitable Access to Post-secondary Education Strategy program, or a similar program, to provide school boards with funding for pilot projects, as well as enrichment and extracurricular programming, that support Ontario's Access to Post-Secondary Education strategy.

Students also recommend that the provincial government take further action on the effects of streaming. Specifically, the Ministry of Education should responsibly and meaningfully engage and consult with relevant stakeholders to outline a clear strategy and timeline for destreaming high school courses in grades 9 and 10, and mandate that academic and applied course streaming be postponed until Grade 11 and 12. The Ministry of Education should also mandate that all school boards implement a strategic plan to provide students with an in-depth understanding of the academic and applied streaming process and the corresponding post-secondary pathways that they lead to.

Additionally, the provincial government should address financial barriers to access by: incentivizing post-secondary institutions to provide more race-based scholarships to underrepresented racialized students from low socio-economic backgrounds, through a special Strategic Mandate Agreement (SMA) funding stream tied to increasing access to underrepresented groups; providing accessible provincial-wide financial aid information sessions for students in high school and their guardians or supports, targeted at racialized students from low socio-economic backgrounds, and ensure they are adequately promoted to all students and their guardians or supports; increasing funding allocated to OSAP in order to implement specific streams of OSAP to provide additional funding for self-identified racialized students from low socio-economic backgrounds; and tasking the Higher Education Quality Council of Ontario (HEQCO) with conducting research on the financial concerns of low-income, racialized students to inform effective strategies to financially support these students. To address barriers to access for students from religious institutions, the provincial government should work with necessary stakeholders and regulators to address any gaps that are present for students in the transfer process from religious secondary education institutions to publicly-assisted secondary education institutions, and task the Ontario Council on Articulation and Transfer to work with stakeholders to address any gaps that are present for students in the transfer process from religious post-secondary institutions to publicly-assisted post-secondary institutions.

To address student concerns related to their transition to post-secondary, the provincial government should: reinvest in and expand the Ensuring Equitable Access to Postsecondary Education Strategy program to provide special ongoing grant funding towards core costs of piloting and continuing postsecondary transition programs that are informed by research and local contexts with the goal of supporting students who face barriers to post-secondary access; incentivize post-secondary institutions to invest in supporting racialized students through measurable metrics under the next iteration of SMAs; task HEQCO with working with institutional and community partners to review existing transition/bridging programs, identify best practices for transition/bridging programs, and provide a framework to improve support for underrepresented and racialized students upon entry to post-secondary education; and mandate the collection of disaggregated race-based data using the Data Standards for the Identification and Monitoring of Systemic Racism for the purposes of identifying programs that support the transition of racialized students to post-secondary education. Additionally, the MCU should work with the Ministry of Education and the Ministry of Children, Community and Social Services to integrate access initiatives and transition programs, considering the local context and existing evidence and best practices, to support underrepresented and racialized students transition to their post-secondary institution.

Decolonizing and Enhancing Academia

To support decolonizing efforts in academia, the provincial government should contract organizations with a deep understanding of decolonizing practices and a demonstrated commitment to decolonizing academia, in responsible and meaningful consultation with faculty and students, to develop best practices and procedures that will guide decolonization efforts in post-secondary institutions. Additionally, they should require, and provide adequate funding for, post-secondary institutions to provide mandatory training using evidence-informed methods for faculty and student-facing staff on anti-racism, that reflects lived experiences and is trauma-informed, in order to enhance cultural sensitivity and promote positive classroom experiences for Black and Indigenous students. Students also recommend that the provincial government create a task force composed of students, staff, administrators, and faculty to develop best practices for responding to disclosures of racial discrimination and reporting processes on university campuses and other pertinent equity matters and provide funds to enable the task force to raise awareness of reporting channels and measure their success. Additionally, the provincial government should mandate the amendment of undergraduate Degree Learning Expectations to require all students to develop competencies in equity and diversity and that any organizations contracted by the government should also develop best practices on how to incorporate equity issues into current curriculum, including Indigenization. Students would also like to see increased representation of Black, Indigenous, and People of Colour in faculty, including tenured-faculty, and therefore ask that the provincial government create a fund for post-secondary institutions to conduct equity audits that will help identify equity gaps in institutional hiring and retention practices, and inform the creation of policy, programs, and services to be developed for Black, Indigenous, and People of Colour.

Students also recommend that the provincial government mandate that post-secondary institutions: create policies, in responsible and meaningful consultation with faculty, staff, and students, on the use of racial slurs, hateful rhetoric, that are trauma-informed and consider historical context; make trauma-informed and anonymous reporting mechanisms available for all students who experience harm in the classroom (or online) as a result of course content and/or interactions with fellow students, faculty, and staff; and provide mandatory training for faculty, staff, and students on anti-racism that reflects lived experiences and is trauma-informed, in order to enhance cultural sensitivity and promote positive academic experiences, particularly for Black, Indigenous, and People of Colour.

Strengthening Student Supports

Students ask that the provincial government direct HEQCO to collaborate with post-secondary institutions and other relevant stakeholders to conduct research into best practices on cultivating and integrating a culture of equity, diversity, and inclusion within post-secondary communities and student support services. Additionally, they should: mandate that post-secondary institutions implement re-occurring, mandatory equity, diversity, and inclusion training and ongoing education opportunities for all student-facing staff and volunteers; provide envelope funding to programs, services, and offices that provide specific support to racialized and religious students; mandate that post-secondary institutions evaluate, using standardized metrics, the effectiveness of their equity, diversity, and inclusion policies in addressing students' concerns as it relates to student support services; and provide increased and ongoing funding for Indigenous Student Centres through the Postsecondary Education Fund for Aboriginal Learners, without the need for recurring grant applications.

To support access to health care services, the provincial government should: task HEQCO with conducting research into equity, diversity, and inclusion issues present in student wellness centres and examine best practices for offering equitable physical and mental health services to students; mandate that all student-facing health services staff undergo mandatory, re-occurring equity, diversity, and inclusion training and ongoing education opportunities; allocate a certain portion of post-secondary mental health care funding to the hiring of more racialized staff who can better understand and address the unique perspective and needs of racialized students; and provide funding for community-based mental health care providers to supply culturally relevant and diverse counselling and support groups for post-secondary students. Additionally, the provincial government should mandate that post-secondary institutions develop support programs for underrepresented racialized students attending and applying to health care programs.

Addressing Racism, Discrimination, and Exclusion on Campus

To address and respond to the high prevalence of racism and discrimination on post-secondary campuses, the provincial government should: mandate that post-secondary institutions make trauma-informed and anonymous reporting mechanisms available for all students who experience racial and religious discrimination; provide funding for research on religious discrimination and its effects in post-secondary institutions, with a focus on antisemitism and Islamophobia; and task HEQCO with conducting research on racism towards the Asian and Pacific Islander communities and its effects in post-secondary institutions. They should use this research to create best practices to inform institutional responses and policies to address religious discrimination on post-secondary institutions.

To promote inclusion on campuses, the MCU should require all postsecondary institutions to clearly communicate accommodation policies and reporting procedures to students, faculty, and staff. Additionally, the provincial government should task HECQO to work with the Ontario Human Rights Commission to release a basic framework with general guidelines for implementing institutional accommodation policies and reporting procedures that are student-centred and abide by the *Ontario Human Rights Code (Code)* and to conduct an audit of current accommodation practices at Ontario universities and how equipped faculty and staff feel to support accommodations according to institutional policies and the *Code*. The provincial government should also provide funding, according to institutional need, for centralized offices with staff equipped with the training and expertise to provide guidance to faculty and administration on accommodation for religious and cultural practices; as well as for the reasonable allotment of physical spaces on campus to facilitate the observation of certain religious and cultural practices.

Amendments to Special Constable and Campus Security Systems

Students ask that the provincial government: task HEQCO with conducting research on the effectiveness of police on campus and their effect on racialized students; mandate that institutions conduct responsible and meaningful consultations with all campus community members – particularly Black, Indigenous, and racialized students – to collect community concerns and create a long-term community-informed plan for campus safety; and mandate that institutions conduct annual reviews of the effectiveness of current campus security practices, policies, systems, and infrastructure with active engagement of Black, Indigenous, and racialized students and communicate findings in a public, accessible manner to students.

Recognizing that students have shared a number of concerns and potential interventions already, the provincial government should: mandate that institutions publish current data collection processes regarding campus security/special constable systems to students in a clear and accessible manner; provide a clear and accessible breakdown of funding of campus security systems to students and the general public; mandate that institutions provide mandatory community policing, de-escalation, anti-racism, and Indigenous cultural competency training to all current security officers and/or special constables serving on campuses; develop a common standard for universities to collect demographic data, including disaggregated race-based data, and mandate that campus security collect and report demographic data on interactions.

Students also ask that the provincial government amend Part IV, section 28 of the *Comprehensive Ontario Police Services Act, 2019* to specify that, where a municipal police service board appoints special constables to be employed by a post-secondary institution, the municipal diversity plan include diverse student representation from Black, racialized, and/or Indigenous communities. They should also: provide special grant funding for training and staffing of student- and community-led non-enforcement crisis intervention response teams on campuses; mandate that post-secondary institutions create a public plan within three years through responsible and meaningful consultation with students to create more compassionate, community-informed, and culturally and racially diverse campus safety models, including the re-allocation of funding from any existing and future campus security or policing budgets to student- and community-led non-enforcement crisis intervention services, social services, and mental health supports on campuses; and create a fund for post-secondary institutions to conduct equity audits that will help identify gaps in institutional hiring and prioritize hiring of Black, Indigenous, and racialized campus security.

Holding Institutions Accountable

To ensure that post-secondary institutions are accountable to furthering racial and religious equity on their campuses, the provincial government should responsibly and meaningfully consult with Black, Indigenous, racialized, and religious students on what racial and religious equity looks like at their post-secondary institutions to develop equity metrics, and incentivize post-secondary institutions to invest in racial and religious equity work through a performance metric, under the next iteration of SMAs. Additionally, the provincial government should commission research that outlines actionable steps to reduce the impact of systemic racism on post-secondary education and dismantle systemic racism in education and develop consistent and recurring grants for equity workers, offices, programs, and services at post-secondary institutions. They should also mandate that post-secondary institutions have independent, confidential reporting structures for students, staff, and faculty to raise concerns on equity issues.

To support the collection of equity-based data and ensure it is done ethically and safely, the provincial government should commission research, and responsibly and meaningfully consult with Black, Indigenous, and racialized students, to ensure that the Data Standards for the Identification and Monitoring of Systemic Racism can be appropriately applied to the post-secondary education sector and mandate the collection of equity-based data using these standards at all stages of post-secondary education processes such that an all-encompassing set of data is collected at least every three years.

Supporting Students in their Communities

Finally, students ask that the provincial government support them in being safe and welcome in their communities. To this end, they ask that the provincial government increase funding allocated for Anti-Racism Initiatives under the Anti-Racism Directorate with a dedicated stream of funding for initiatives that benefit post-secondary students and other youth. They also ask that the provincial government responsibly and meaningfully consult with Black, Indigenous, and racialized students to ensure Canada's Anti-Racism Strategy meets the needs of students in Ontario, and work with the federal government on implementation of the strategy, as well as to amend Ontario's 3-Year Anti-Racism Strategic Plan following a review to update the timeline, targets, and indicators to support the work of Canada's Anti-Racism Strategy, with an emphasis on youth-focused initiatives. These amendments should include the addition of a target under "Education sector indicators" for the percent and number of post-secondary institutions collecting race-based data and a target under "Education sector indicators" for the enrollment of Black, Indigenous, and racialized students in post-secondary education compared to demographics of the general population, percent and number of post-secondary institutions collecting race-based data, and response rates in the collection of personal information by post-secondary institutions.

Additionally, the provincial government should: amend the *Anti-Racism Act*, 2017, s.4 to mandate responsible and meaningful consultation with racialized students most adversely impacted by racism; responsibly and meaningfully consult widely, including with post-secondary students, on prospective Anti-Racism Initiatives and projects for the Anti-Racism Directorate to undertake; work with regions and municipalities to ensure that there is accessible, comprehensive, no-cost access to mobile crisis intervention services for every member of the community, including post-secondary campuses, which do not call or involve the police; and task the Ontario Human Rights Commission to develop, in consultation with experts, a formalized definition of anti-Asian racism.

Part of being safe and welcome in one's community is being safe and welcome in housing. To this end, the provincial government should communicate human rights protections in housing under O. Reg. 290/98 and the *Code*, and remedies available to prospective tenants through "Renting in Ontario," or similar resources as well as through promotional materials posted at post-secondary institutions and other public places. They should also widely advertise information available through Steps to Justice and the Human Rights Legal Support Centre in student-focused resources and expand these resources to support international students and other non-official language speaking students.

A safe and welcome community is one where students are safe and welcome in their employment as well. To this end, the provincial government should communicate human rights protections for workers under

the *Code* and remedies available to students through “Young Workers,” or similar resources as well as through promotional materials posted at post-secondary institutions and other public places. They should also ensure that resources on equitable and inclusive hiring and employment practices are grounded in responsible and meaningful consultation and are widely publicized to employers.

INTRODUCTION

Everyone deserves to be able to safely pursue their education, yet racialized and religious students have consistently shared experiences and concerns about the ways in which institutional and provincial policies and practices infringe on their ability to do so. Students experience racism and religious discrimination from their peers, faculty, staff, administrators, curricula, and in the very ways in which their institutions operate. They go to school, live, and work in environments that are inequitably designed, and that contribute to negative mental and physical health, academic, and employment outcomes. And, as a result of inaction from institutional and provincial leadership, students who are subject to this violence have limited, if any, support.

The Ontario Human Rights Commission (OHRC) has recognized “that Indigenous, Black and racialized students are experiencing significant concerns of discrimination, xenophobia and targeting on campuses and in academic environments across Ontario” and has raised concerns that post-secondary institutions are not effectively or meaningfully responding to these concerns. They have reminded post-secondary institutions of their legal responsibilities to “to examine the conditions, challenges and impediments to a respectful learning environment...[and to implement] robust policies, protocols and complaint mechanisms to ensure human rights are fully recognized and respected.”³⁶ And while some institutions have taken steps to address systemic racism and religious discrimination on their campuses in response to student advocacy, institutional responses are inconsistent, continue to place the burden on students and, in many cases, offer little system-wide, tangible solutions.

Students want and deserve to access post-secondary education in an equitable and inclusive environment where they are safe and supported. They want and deserve more than “commitments” or surface-level, disjointed responses. They want and deserve a comprehensive, proactive approach that recognizes and seeks to address the systemic nature of racial and religious inequities and that heeds their calls for meaningful response to the racism and religious discrimination they experience on their campuses. To that end, students have developed recommendations that offer a foundation for a comprehensive, province-wide framework that is student-driven and reflective of the persistent and ongoing advocacy of students across the province. However, while important, these recommendations are not a complete response to student issues. That is why it is critical that the provincial government follow the leadership and guidance of racialized and religious students, faculty, staff, administrators, and community leaders to continue this work.

Many of the recommendations in this paper require consultation or collaboration with, and leadership from, racialized and religious students. However, it is important that this does not exacerbate the already heavy burden of undoing and dismantling these systems that these students have had to carry and that it is a safe and supportive process for those involved. Therefore, the recommendations in this paper that ask for student involvement should include the following elements. First, these processes must be designed to value and centre the voices, experiences, and ideas of racialized and religious students, and they should be inclusive of those who are most impacted, particularly those who are traditionally excluded. They should take an intersectional and equity-lens to understand the multitude of experiences and needs of racialized and religious students. Second, these processes should not tokenize or otherwise harm the students involved. To this end, all students should be equitably compensated for their time and emotional labour. They should also be provided with access to services, programs, and resources should they want or need support throughout the process. Finally, these processes should be accountable. This requires ongoing communication and transparency for both the students directly involved, as well as the broader student population.

There are also recommendations in this paper for training and other educational opportunities that aim to address some of these issues at the individual and cultural level. Students recognize that training is not, and cannot be, a solution in and of itself. However, they also recognize that it can be an effective tool if

³⁶ Ena Chadha, “Letter to Universities and Colleges on Racism and Other Human Rights Concerns,” *Ontario Human Rights Commission*, December 18, 2020, http://www.ohrc.on.ca/en/news_centre/letter-universities-and-colleges-racism-and-other-human-rights-concerns.

used alongside broader, more systemic interventions, and if it is done intentionally and using evidence-informed methods. Therefore, the recommendations in this paper that mandate training should be understood within the context of this policy paper in its entirety. They should be understood as calls for evidence-informed, culturally relevant educational opportunities that require active engagement from participants and provide tools for action that can be employed in a given institutional context. It should also be understood that this training should account for the experiences of racialized and religious participants and measures should be employed to ensure that they are not further traumatized, burdened, or otherwise harmed, including the option to withdraw from sessions or programs as necessary.

Finally, students recognize the complexity of language and the implications of applying labels to groups of people, including the history of language in reinforcing racial hierarchies. Terminology is always in flux and there are multiple terms used to describe, categorize, or otherwise identify people at any given time, including within identified groups. This is unsurprising given the ethnic, linguistic, religious and political diversity that exists within racial groups. OUSA recognizes the importance of using language or terminology that is preferred by the person or group identified. However, for the purposes of writing this policy paper a consensus was reached on language used based on general appropriateness and understanding at the time this policy paper was written, a commitment to demonstrating respect, and an intention to challenge harmful or stereotypical narratives. For example, wherever possible, concerns and recommendations use language to identify specific groups impacted. However, there are many cases where it was necessary to refer more broadly to groups of students. In these cases “racialized” or “Black, Indigenous, and People of Colour” are used and reflect the definitions laid out in the “Glossary”, above.

MINISTRY OF TRAINING, COLLEGES AND UNIVERSITIES ACT

Principle: Students' post-secondary education should be free of racism and religious discrimination.

Principle: Post-secondary institutions play a key role in creating an environment free of racism and religious discrimination and addressing racism and religious discrimination should it arise.

Principle: The provincial government plays a key role in ensuring that post-secondary education is equitable across the entire sector.

Concern: There is a lack of widespread action to build racial and religious equity and address racism and religious discrimination across the post-secondary education sector.

Concern: Not all post-secondary institutions have a standalone policy that includes practices to create an equitable environment and address racism and religious discrimination.

Recommendation: The provincial government should amend the *Ministry of Training, Colleges and Universities Act* to require all post-secondary institutions to have a standalone racial and religious equity policy.

Recommendation: The provincial government should create a regulation setting out requirements with regard to the content of racial and religious equity policies at post-secondary institutions.

Recommendation: The provincial government should strike an advisory committee of racialized and religious students, faculty, staff, administrators, and community leaders in the creation of legislation and regulation with regard to the content of racial and religious equity policies at post-secondary institutions.

Recommendation: Through regulation, the provincial government should mandate that post-secondary institutions create their own equity, diversity, and inclusion action plans that include addressing and evaluating student recruitment strategies as well as those for hiring faculty and student-facing staff, with emphasis on the recruitment of Black, Indigenous, and other underrepresented People of Colour.

In 2017, the provincial government made addressing gender-based violence on post-secondary campuses a priority with the addition of section 17 in the *Ministry of Training, Colleges and Universities Act* which required all applicable post-secondary institutions to have a standalone sexual violence policy, the content of which would meet the criteria laid out in O. Reg. 131/16. This was a significant step towards a long needed comprehensive framework to prevent and respond to gender-based violence on post-secondary campuses and has since provided a foundation for continued advocacy to ensure that institutional policies and practices are effective and meet student needs.

Much like gender-based violence, racism and religious discrimination persist on post-secondary campuses and, as a result of inaction from institutional and provincial leadership, students who are subject to this violence have limited, if any, support. And while steps have been taken at the provincial level to address gender-based violence, little has been done in response to the targeted and pervasive race- and religious-based violence at post-secondary institutions. In December 2020, the Ontario Human Rights Commission (OHRC) published a letter to the Presidents and Principals of colleges and universities in the province asking for a commitment “to take action to create and sustain equitable and inclusive education environments” in response to the “significant concerns of discrimination, xenophobia and targeting on campuses and in academic environments” against Indigenous, Black, and racialized students. This statement was made recognizing the burden that is placed on Indigenous, Black, and racialized students to address the systemic racism and human rights issues at their institutions – a burden that the OHRC makes clear is the responsibility of senior leadership at post-secondary institutions.³⁷

³⁷ Chadha, “Letter to Universities and Colleges on Racism and Other Human Rights Concerns”.

In response to student demands, some institutions have taken steps to address systemic racism and religious discrimination on their campuses. Institutional responses have varied, from statements of commitment to the development of action plans, with some implementing new practices or tools to support students who experience these harms.³⁸ However, these responses continue to place the burden on students and, in many cases, offer little system-wide, tangible solutions. The lack of consistency across institutions coupled with surface-level commitments make it clear that addressing racism and religious discrimination and ensuring racial and religious equity at Ontario universities has not been made a priority. To strengthen the commitment implored by the OHRC, there needs to be provincial-level guidance and leadership that ensures post-secondary institutions prioritize this pressing issue and that racialized and religious students are no longer forced to carry this heavy burden.

A clear first step for the provincial government is to address the fact that not all post-secondary institutions have standalone policies that include practices to create an equitable environment and address racism and religious discrimination on their campuses. Following the model employed to address gender-based violence on post-secondary campuses, OUSA believes that the provincial government should amend the *Ministry of Training, Colleges and Universities Act* to require all post-secondary institutions to have a standalone racial and religious equity policy. While not a panacea, requiring post-secondary institutions to have such a policy is one element of a comprehensive framework to address racism and religious discrimination and create a more equitable post-secondary experience.

Importantly, this amendment must be accompanied by a regulation that lays out required criteria for institutional policies addressing race- and religious-based inequities, as well as racism and religious discrimination. Having an instructive, comprehensive regulation will guide the creation of policies and practices that are effective and meet student needs so that the creation of institutional policies does not end up being another surface-level response that fails to address these issues. These legislative amendments should be designed to help create an equitable environment and to address racism and religious discrimination. To that end, the accompanying regulation should include a working policy definition of racism and religious discrimination that is inclusive and all-encompassing, ensuring that both overt and covert experiences of racism and religious discrimination are recognized. The regulation should also include guidance on compensation for equity work, processes for equity-based data collection, hiring practices, practices for decolonization, provisions of student supports and services, trauma-informed processes for reporting and addressing discrimination or other forms of race- or religious-based violence, and requirements for regular policy review and public reporting of equity work on a 3-year cycle. Additionally, post-secondary institutions should be required to create their own equity, diversity and inclusion action plans which include addressing and evaluating student recruitment strategies as well as those for hiring faculty and student-facing staff, with emphasis on the recruitment of Black, Indigenous and other underrepresented People of Colour.

The creation of this legislative amendment and the accompanying regulation will only be effective if it is done in collaboration with racialized and religious students, faculty, staff, administrators, and community leaders who have the necessary experience and expertise. The provincial government should therefore strike an advisory committee of racialized and religious students, faculty, staff, administrators, and community leaders to lead the creation of this legislation and regulation. Because this work will be both labour-intensive and emotionally difficult, it is important that all members of the advisory committee be paid equitably and provided with access to any necessary support throughout the process. The advisory committee will be vital to the effectiveness of this legislative tool and must therefore be respected as such. Through the leadership of racialized and religious students, faculty, staff, administrators, and community leaders, the provincial government can provide post-secondary institutions with the necessary guidance to develop robust and meaningful policies that support racial and religious equity and address racism and

³⁸ See, for example: “Queen’s University Administration’s Declaration of Commitment to Address Systemic Racism,” *Queen’s Gazette*, August 14, 2020, <https://www.queensu.ca/gazette/stories/declaration-commitment-address-systemic-racism>; Office of the President, “University’s Anti-Racism Action Plan,” *University of Guelph*, updated January 14, 2021; Elan Pedersen, “Western Introduces New Centralized Racism Reporting Tool,” *The Gazette*, March 10, 2021, https://westerngazette.ca/news/western-introduces-new-centralized-racism-reporting-tool/article_c4fb9450-7b88-11eb-b9fe-739746e4fa07.html.

religious discrimination on their campuses.

The recommendations laid out in the rest of this policy paper can be used as a starting point to inform the legislation and regulation development as they capture a number of student concerns and proposed solutions or responses. OUSA believes that sector-wide institutional policies can be an effective vehicle to realize these recommendations, although they are each important as part of a greater, comprehensive framework to address racism and religious discrimination in post-secondary education as they offer a necessary student perspective. The recommendations in this policy paper should be seriously considered in this work, but they are also not a complete response to the issues. That is why it is critical that the provincial government follow the leadership and guidance of racialized and religious students, faculty, staff, administrators, and community leaders, which will ensure that legislative response is comprehensive and inclusive.

ACCESS

Principle: All willing and qualified students should have equitable access to post-secondary education.

Principle: All willing and qualified students from religious secondary and post-secondary institutions should be adequately supported if they choose to transfer to a publicly-assisted post-secondary institution.

Concern: Racialized students disproportionately face financial and non-financial structural barriers to post-secondary education as a result of inadequate access to information about financial aid, income inequality, and labour market discrimination.

Concern: Black and Indigenous students are disproportionately encouraged to choose applied courses or programs during the course of, and after, their high school career, which limits their opportunities for success in post-secondary education.

Concern: Existing government policies designed to improve access to higher education have done little to achieve equitable access to post-secondary institutions for underrepresented students.

Concern: Students in the transfer process from religious post-secondary institutions to publicly-assisted post-secondary institutions face social difficulties when navigating the two different systems.

Concern: Students from some religious secondary and post-secondary institutions face difficulties having their course credits recognized when transferring to a publicly-assisted post-secondary institution.

Concern: Racialized students from low-socioeconomic backgrounds can face labour market discrimination that impacts their earnings and their ability to pay off student debt they may have.

Concern: OSAP currently fails to address the financial barriers that students face before they are in school.

Recommendation: The Ministry of Education and the Ministry of Colleges and Universities should work together to reform their current policies on equitable access to higher education and increase resources, including, but not limited to, funding and supports, to improve access to post-secondary education for underrepresented students instead of solely focusing on expanding overall post-secondary enrollment.

Recommendation: The Ministry of Education should develop and implement income-targeted enrichment programs throughout students' primary and secondary education to ensure that underrepresented groups have equitable access to high-quality supplementary support with regard to post-secondary education.

Recommendation: The provincial government should work with relevant stakeholders to conduct studies on systemic racism across campuses and establish best practices for equitable and inclusive teaching practices to combat the effects of systemic racism and implicit racial bias that affects some racialized students, especially Black and Indigenous students, within the primary and secondary education system.

Recommendation: The provincial government should reintroduce the Ensuring Equitable Access to Post-secondary Education Strategy program, or a similar program, to provide school boards with funding for pilot projects, as well as enrichment and extracurricular programming, that support Ontario's Access to Post-Secondary Education strategy.

Recommendation: The Ministry of Education should responsibly and meaningfully engage and consult with relevant stakeholders to outline a clear strategy and timeline for destreaming high school courses in Grades 9 and 10.

Recommendation: The Ministry of Education should mandate that academic and applied course streaming be postponed until Grade 11 and 12.

Recommendation: The Ministry of Education should mandate that all school boards implement a strategic plan to provide students with an in-depth understanding of the academic and applied streaming process and the corresponding post-secondary pathways that they lead to.

Recommendation: The provincial government should incentivize post-secondary institutions to provide more race-based scholarships to underrepresented racialized students from low socio-economic backgrounds, through a special Strategic Mandate Agreement funding stream tied to increasing access to underrepresented groups.

Recommendation: The provincial government should provide accessible provincial-wide financial aid information sessions for students in high school and their guardians or supports, targeted at racialized students from low socio-economic backgrounds, and ensure they are adequately promoted to all students and their guardians or supports.

Recommendation: The provincial government should increase funding allocated to OSAP in order to implement specific streams of OSAP to provide additional funding for self-identified racialized students from low socio-economic backgrounds.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario to conduct research on the financial concerns of low-income students who are also racialized to inform effective strategies to financially support these students.

Recommendation: The provincial government should work with necessary stakeholders and regulators to address any gaps that are present for students in the transfer process from religious secondary education institutions to publicly-assisted secondary education institutions.

Recommendation: The provincial government should task the Ontario Council on Articulation and Transfer to work with stakeholders to address any gaps that are present for students in the transfer process from religious post-secondary institutions to publicly-assisted post-secondary institutions.

As is discussed throughout this policy paper, and in the “Equity -Based Data” section in particular, there is currently a gap in disaggregated data needed to provide a complete and accurate depiction of post-secondary student demographics in Ontario. This makes it difficult to fully understand who is underrepresented in these spaces. However, available data has shown that Indigenous students and low-

income students are underrepresented in post-secondary spaces³⁹ – which can be extrapolated to suggest racialized students are also underrepresented given the fact there is “an unequivocal pattern of racialized income inequality in Canada...show[ing] no signs of disappearing.”⁴⁰ It has also been demonstrated that Black and Indigenous people are underrepresented in full-time faculty positions, and racialized people are severely underrepresented in senior leadership positions which can be understood as both a symptom of underrepresentation, and a factor in its perpetuation as a lack of representation discourages and limits opportunities for racialized students to pursue post-secondary education.⁴¹ It is also clear that racialized students disproportionately face financial and non-financial structural barriers to post-secondary education compared to their white peers. For example, the research that is available reveals that structural barriers result in “Black, Latino, and Southeast Asian students [being] less prepared for post-secondary education than White students.”⁴² Thus, while there is currently no data to quantify the exact degree of underrepresentation of racialized students, there are a number of concerns that need to be addressed in order to ensure that all students have equitable access to post-secondary education.

First, racialized students face unique financial barriers to accessing post-secondary education as a result of inadequate access to information about financial aid, income inequality, and labour market discrimination. According to the 2016 census data, “racialized individuals are more likely to be in families in the bottom half of the income distribution (60%) than non-racialized individuals are (47%)” – unemployment rates are highest in racialized populations; there is a significant and stagnant earnings gap between racialized populations and non-racialized populations; and racialized populations report lower rates, and amounts, of capital gains and investment income.⁴³ Labour market discrimination is another factor contributing to the unique financial barriers racialized students face. This is seen in the fact that “[r]acialized workers are more likely to be active in the workforce than non-racialized workers, either working or trying to find work, but this does not result in better employment outcomes for them.”⁴⁴ These inequalities in income and labour market outcomes are a significant factor in a student’s earnings, while in school and following graduation, infringing on their ability to pay off student debt which can be a deterrent to accessing post-secondary education. Additionally, these inequalities suggest that racialized students are more likely to be lower income or come from lower income families, meaning they are also more likely to rely on OSAP to afford their education. However, as OUSA has consistently advocated, OSAP is insufficient to meet student needs and provide adequate support for affordable post-secondary education.⁴⁵

To address financial barriers faced by students, more needs to be done to tackle wealth, income, and labour market inequalities on a broad scale. As a first step, the Higher Education Quality Council of Ontario should conduct research on the financial concerns of low-income students who are also racialized to inform effective strategies to financially support these students. It is important that this research explore the systemic and structural barriers outlined above, and that it take an intersectional lens to understanding the unique financial concerns of racialized students compared to their non-racialized peers, including the role of immigration and citizenship. More immediately, however, the provincial government should implement specific streams of OSAP – accompanied by increased funding – to

³⁹ John Doran et al., *What are Ontario’s Universities Doing to Improve Access for Under-represented Groups?* (Higher Education Quality Council of Ontario, 2015).

⁴⁰ Sheila Block, Grace-Edward Galabuzi, Ricardo Tranjan, *Canada’s Colour Coded Income Inequality* (Canadian Centre for Policy Alternatives, December 2019), 6.

⁴¹ Frances Henry et al., “Race, Racialization and Indigeneity in Canadian Universities,” *Race Ethnicity and Education* 20, no. 3 (2017): 300-314, <https://doi.org/10.1080/13613324.2016.1260226>; Anya Zoledziowski, “Lack of Faculty Diversity Can Affect Studies and Career Aspirations,” *The Globe and Mail*, October 18, 2017, <https://www.theglobeandmail.com/news/national/education/canadian-university-report/lack-of-faculty-diversity-can-affect-studies-and-career-aspirations/article36637410/>; *Underrepresented & Underpaid: Diversity & Equity Among Canada’s Post-Secondary Education Teachers* (Canadian Association of University Teachers, April 2018), 2; *Equity, Diversity, and Inclusion at Canadian Universities: Report on the 2019 National Survey* (Universities Canada, October 2019), 10.

⁴² Karen Robson, Paul Anisef, Robert S. Brown, R. C. George, “Under-Represented Students and the Transition to Post-Secondary Education: Comparing Two Toronto Cohorts,” *Canadian Journal of Higher Education* 48, no. 1 (2018): 39-59, <https://doi.org/10.47678/cjhe.v48i1.187972>.

⁴³ Block et al., *Canada’s Colour Coded Income Inequality*, 4-5.

⁴⁴ *Ibid.*

⁴⁵ For example, see: *Educated Investments: Supporting Students for a Stronger Recovery* (Ontario Undergraduate Student Alliance, February 2021).

provide additional financial support for self-identified racialized students from low socio-economic backgrounds. This is intended to address the fact that racialized students face additional systemic and structural financial barriers that non-racialized students do not face. It is important to allow students to self-identify to avoid the harms and inequities that could arise as a result of the provincial government or post-secondary institutions making determinations based on how students present or an incomplete understanding of these ways in which they experience race. OUSA believes that this outweighs concerns that students will abuse this process and lie about being racialized. Additionally, the provincial government should incentivize post-secondary institutions to provide more race-based scholarships to underrepresented racialized students from low socio-economic backgrounds. This should be done through a special Strategic Mandate Agreement (SMA) funding stream tied to increasing access to underrepresented groups, which provides a clear policy vehicle for incentivization and provides synergy with the SMA process. To complement the expansion of OSAP and institutional race-based scholarships, the provincial government should provide accessible province-wide financial aid information sessions for students in high school and their guardians or supports, targeted at racialized students from low socio-economic backgrounds. These sessions should be adequately promoted to all students and their guardians or supports, and be accessible at various times to account for the shift work that some guardians or supports may be balancing.

Second, racialized students face unique non-financial barriers to accessing post-secondary education that are not adequately addressed in provincial access strategies. For example, current policies on access to post-secondary education focus on expanding overall student enrollment to post-secondary institutions, which has been shown to do little to achieve equitable access for traditionally underrepresented groups of students, suggesting a need for a more targeted approach.⁴⁶ To that end, the Ministry of Education and the Ministry of Colleges and Universities should work together to reform their current policies on equitable access to higher education and increase resources, including, but not limited to, funding and supports, to improve access to post-secondary education for underrepresented students instead of solely focusing on expanding overall post-secondary enrollment. The Ministries should take an encompassing approach to this reform and consider any policies that could play a role in increasing equitable access to post-secondary, including policies at the K-12 level and post-secondary institution incentivization policies, such as SMAs.

To support this work, the provincial government should work with relevant stakeholders to conduct studies on systemic racism across campuses and establish best practices for equitable and inclusive teaching practices to combat the effects of systemic racism and implicit racial bias that affects some racialized students, especially Black and Indigenous students, within the primary and secondary education system. It is well-documented that improvements to equitable access to post-secondary institutions must begin with policy change during K-12 education,⁴⁷ and understanding the effects of systemic racism and implicit racial bias will allow for a more informed access strategy. Among the relevant stakeholders to support this research, the provincial government should include the Ministry of Education and seek out racialized students at post-secondary institutions, as well as racialized K-12 students and their families, guardians, and supports. They should also include racialized community members who did not attend post-secondary education to better understand the role of systemic barriers in their educational pathways. They should include provincial advocacy groups that are working towards equitable outcomes in education, such as Parents of Black Children,⁴⁸ racialized educators and organizations, such as the Ontario Black History Society,⁴⁹ as well as Indigenous communities, schools, and educators. In addition to best practices for equitable and inclusive teaching practices, this work should also inform curriculum reform to challenge the ways in which it perpetuates implicit racial bias and erases discussions on systemic racism. This research and subsequent best practices should also challenge so-called “positive” stereotypes and “model minority” rhetoric – often used as a tool of white supremacy to oppress other groups and minimize experiences of oppression or racism of “model

⁴⁶ Fiona Deller, Amy Kaufman, and Rosanna Tamburri, *Redefining Access to Postsecondary Education* (Higher Education Quality Council of Ontario, 2019), 3.

⁴⁷ *Ibid.*

⁴⁸ “Welcome,” *Parents of Black Children*, accessed April 29, 2021, <https://parentsofblackchildren.org/>.

⁴⁹ “Black History Society,” *Ontario Black History Society*, accessed April 29, 2021, <https://blackhistorysociety.ca/>.

minority” groups.⁵⁰ This can have detrimental effects on students, particularly Asian students, dissuading them from pursuing particular fields or pushing them inappropriately towards stereotypical fields.

Additionally, OUSA recognizes that enrichment programs act as supplementary support for students that expand their breadth of understanding and learning, and therefore can be used to improve access to post-secondary education. Therefore, the Ministry of Education should develop and implement income-targeted enrichment programs throughout students’ primary and secondary education. They can do this through the reintroduction of the Ensuring Equitable Access to Post-secondary Education Strategy program – which provided funding for programs “to support at-risk students with transitions to PSE [post-secondary education] and to see the value of and opportunities in PSE pathways” with a focus on non-financial barriers⁵¹ – as a means to provide school boards with funding for enrichment and extracurricular programming that support Ontario’s Access to Post-Secondary Education strategy. Funding should be provided to elementary schools across the province to create and run extracurricular programs, that promote a variety of future career paths, such as those that promote entrepreneurship and careers in marketing, finance, hospitality management, STEM (science, technology, engineering, and mathematics), and law, amongst others. Attention should be paid to those that help bridge social gaps between domestic and international students and ensuring schools located in economically disadvantaged areas have the equitable capacity to offer these extracurricular programs.

Black and Indigenous students face an additional barrier to accessing post-secondary education as a result of “streaming” – Black and Indigenous students are disproportionately encouraged to choose applied courses or programs during the course of, and after, their high school career, which limits their opportunities for success in post-secondary education and has a number of other negative effects.⁵² Recently, the Ministry of Education committed to ending streaming for Grade 9 math classes but there is little information about future plans to address the issue of streaming for all core subjects in both Grades 9 and 10. Research, advocacy, and educational groups across Ontario recognize destreaming as a one element of equitable access strategies as well as its importance to addressing the systemic inequalities that limit the success of Black and Indigenous students, and have called on the provincial government to end streaming in core course in both Grade 9 and Grade 10.⁵³ OUSA echoes these calls and specifically asks that Ministry of Education responsibly and meaningfully engage and consult with relevant stakeholders to outline a clear strategy and timeline for destreaming high school courses that recognizes the disproportionate impact on Black and Indigenous students. Stakeholders should include groups such as the Coalition for Alternatives to Streaming in Education, People for Education, the Higher Education Quality Council of Ontario, and other groups who understand the inequities inherent in streaming. The Ministry of Education should also mandate that academic and applied course streaming be postponed until Grades 11 and 12 and that all school boards implement a strategic plan to provide students with an in-depth understanding of the academic and applied streaming process and the corresponding post-secondary pathways that they lead to. This will help to ensure that, when students do encounter streaming in later grades, that they are informed of how streaming will impact their future academic and career

⁵⁰ Jiyoung Lee-An and Xiaobei Chen, “The Model Minority Myth Hides the Racist and Sexist Violence Experienced by Asian Women,” *The Conversation*, March 28, 2021, <https://theconversation.com/the-model-minority-myth-hides-the-racist-and-sexist-violence-experienced-by-asian-women-157667>; Adrian Cheung, “How the ‘Model Minority’ Myth Fuels Anti-Asian Racism and White Supremacy,” March 31, 2021, in *This Matters* produced by the Toronto Star, podcast, 31:03, <https://www.thestar.com/podcasts/thismatters/2021/03/31/how-the-model-minority-myth-fuels-anti-asian-racism-and-white-supremacy.html>.

⁵¹ Launa Larlee and Leah McCann, “Ontario’s Education Strategy: Unfinished work, so what’s next?,” *Careerwise by CERIC*, (2019), <https://careerwise.ceric.ca/2019/01/16/ontarios-access-to-postsecondary-education-strategy-unfinished-work-so-whats-next/#.YD5psl1KiLo>; Ministry of Education, “Equitable Access to Postsecondary Education – Call for Proposal” (Memo Summary) April 27, 2018, <http://www.edu.gov.on.ca/eng/policyfunding/memos/april2018/access-pse-calls-for-proposals-2018.html>.

⁵² For a more comprehensive discussion of the effects of streaming and student concerns, see Nathan R. G. Barnett, Anthony Coulter, Matthew Gerrits, Matthew Mellon, Megan Town, and Tiffany Yung, *Policy Paper: A Comprehensive Access Strategy* (Toronto, ON: Ontario Undergraduate Student Alliance, 2020).

⁵³ “Home,” *The Coalition for Alternatives to Streaming in Education*, accessed April 29, 2021, <https://www.endstreaming.org/>; Jackie Pichette, Fiona Deller, and Julia Colyar, *Destreaming in Ontario: History, Evidence and Educator Reflections* (Higher Education Quality Council of Ontario, 2020); Amin Ali, “How Ontario Can Get De-Streaming Right,” *People for Education*, July 15, 2020, <https://peopleforeducation.ca/our-work/how-ontario-can-get-de-streaming-right/>; “Ontario to End ‘Discriminatory’ Practice of Academic Streaming in Grade 9,” *CBC News*, July 6, 2020, <https://www.cbc.ca/news/canada/toronto/ontario-streaming-high-school-racism-1.5638700>.

pathways.

Finally, it is important to recognize that barriers to access can manifest in different ways for religious students. Students have shared concerns about their experiences when seeking to transfer from religious secondary and post-secondary institutions to publicly assisted educational institutions. Specifically, students have shared concerns about credit recognition. While these concerns are not widely documented, it is important that we listen and respond to them when they are raised by students to ensure we are adequately, comprehensively, and meaningfully promoting racial and religious equity in education. Therefore, OUSA recommends that that provincial government work with necessary stakeholders and regulators, including the Ontario Council on Articulation and Transfer to identify and address gaps and barriers for students in the transfer process from religious educational institutions to publicly-assisted ones.

TRANSITION TO POST-SECONDARY

Principle: A well-supported transition to post-secondary is critical for students to feel confident in their ability to succeed in their post-secondary program.

Principle: Access initiatives designed to promote entry into post-secondary education are more effective when combined with transition/bridging programs upon and after entry.

Principle: Institutional support for racialized students as they transition to post-secondary is necessary to close the post-secondary access gap.

Concern: Many racialized students – including international students, students who are immigrants or children of immigrants, first generation students, and Indigenous students – face significant and often location-specific financial and non-financial barriers to adjusting to post-secondary education and gaining a sense of belonging upon entry.

Concern: Some students from religious communities may face barriers to adjusting to post-secondary education and gaining a sense of belonging upon entry.

Concern: Students from underrepresented and marginalized populations may choose not to attend post-secondary education because of fears of discrimination and lack of programming, staff, and social support.

Concern: Some racialized student populations face lower retention rates, which may be due to discrimination and lack of support.

Concern: Racialized students – especially international students, students who are immigrants or children of immigrants, first generation students, and Indigenous students – may find it more difficult to find peer support networks and role models upon entry to post-secondary education.

Concern: There have been few evaluations of existing transition/bridging programs in Ontario and little research conducted on the effective design of transition/bridging programs to support racialized students.

Concern: There is a lack of funding for transition/bridging programs to support underrepresented and racialized post-secondary students upon entry to post-secondary education.

Concern: Current and prospective post-secondary students may be unaware of existing transition/bridging programs that support underrepresented and racialized post-secondary students upon entry to post-secondary education.

Concern: Post-secondary transition/bridging programs may be ineffective because of a lack of

partnerships with secondary school and community networks.

Recommendation: The provincial government should reinvest in and expand the Ensuring Equitable Access to Postsecondary Education Strategy program to provide special ongoing grant funding towards core costs of piloting and continuing post-secondary transition programs that are informed by research and local contexts with the goal of supporting students who face barriers to post-secondary access.

Recommendation: The provincial government should incentivize post-secondary institutions to invest in supporting racialized students through measurable metrics (including retention and successful experiences of students from underrepresented populations) under the next iteration of Strategic Mandate Agreements.

Recommendation: The Ministry of Colleges and Universities should work with the Ministry of Education and the Ministry of Children, Community and Social Services to integrate access initiatives and transition programs, considering the local context and existing evidence and best practices, to support underrepresented and racialized students transition to their post-secondary institution.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario with working with institutional and community partners to review existing transition/bridging programs, identify best practices for transition/bridging programs, and provide a framework to improve support for underrepresented and racialized students upon entry to post-secondary education.

Recommendation: The provincial government should mandate the collection of disaggregated race-based data using the *Data Standards for the Identification and Monitoring of Systemic Racism* for the purposes of identifying programming to support the transition of racialized students to post-secondary education.

Barriers to access for racialized students can be alleviated or exacerbated by the quality of transition and bridging programs available to support students as they enter post-secondary education for the first time, return to post-secondary education after a period of time, or transfer between institutions. Once a student has been accepted to their program or finalized a transfer, it is critical that they have access to effective supports to ensure they are confident in their ability to succeed and are knowledgeable in the resources available to them to mitigate against “leave rates” – including students who drop out, switch programs or institutions, and those who pause their education for a period of time. While there are a range of reasons why a student may experience interruptions in their post-secondary pathways, some of which are independent from the post-secondary education system itself, there are many that arise as a result of flaws in the system and inadequate policy and programming response.⁵⁴

These inadequacies require a system-wide response that engages with students throughout their post-secondary career to respond to the myriad reasons why a student may choose, or be forced, to end or pause their post-secondary education. Recommendations made throughout this policy paper offer a number of responses that are necessary at various stages in the post-secondary pathway, however it is important to specifically focus on the transition period, recognizing that Ontario university students are more likely to leave their education or switch programs or institution in the first year of study.⁵⁵ Without proper support during this critical stage, students who otherwise would have continued on their chosen pathway may have their plans diverted.

Financial barriers are often the first thought when thinking about the reasons for leaving or switching rates. However, while financial barriers are significant and a primary concern for students, hindering access and playing a role in student success, leaving and switching rates during the first year of study are

⁵⁴ Ross Finnie, Stephen Childs, and Theresa (Hanquin) Qiu, *Patterns of Persistence in Postsecondary Education: New Evidence for Ontario* (Toronto: Higher Education Quality Council of Ontario, 2012), 3, <https://heqco.ca/pub/patterns-of-persistence-in-postsecondary-education-new-evidence-for-ontario/>.

⁵⁵ Finnie et al., *Patterns of Persistence in Postsecondary Education*, 18.

also commonly tied to non-financial barriers.⁵⁶ For many racialized students – including international students, students who are immigrants or children of immigrants, first generation students, and Indigenous students – as well as some religious students, adjusting to post-secondary education and gaining a sense of belonging upon entry can be a challenge due to racism and religious discrimination, inequities on campus, failures to recognize excellence, lack of representation in faculty, staff, and senior leadership to support mentorship opportunities, the Eurocentric and colonized foundation on which education in Canada is built, and a number of other factors, many of which are highlighted throughout this paper. Each of these factors is present across the province but are shaped by the location of the institution and its surrounding community. For example, racialized students, particularly racialized international students, often face higher levels of racism and discrimination within rural and northern communities which hinders retention rates.⁵⁷

Addressing these barriers is critical, as it influences entry and retention rates. Students may choose not to attend post-secondary education due to fears of discrimination and concerns about a lack of supports, including barriers to finding peer support networks and role models or mentors.⁵⁸ Those who do attend may ultimately leave before completing their program after experiencing discrimination based on their race or religion and not receiving necessary support. Eternity Martis, an award-winning journalist, author, and lecturer, reflected on her experience at Western University in a 2020 memoir that resonated heavily with students across the province, sharing: “while my peers were excitedly preparing to go off to university, I was stressing over whether I’d fit in as a Black multiracial student at a predominantly white campus. Would I need to change who I was? Would I be treated differently? Would I make friends or be an outcast?”⁵⁹ As one part of a broader, comprehensive response, it is essential that institutions provide students with the supports they need throughout their post-secondary career, beginning with the initial transition period. Transition or bridging programs are one tangible response as they are designed to “create accessible pathways to PSE [post-secondary education] participation and completion for youth facing multiple and complex barriers.”⁶⁰

However, in order to ensure that these programs are implemented in a way that is effective, there is a need for program evaluation, funding, community partnerships, and information dissemination. There is currently limited research on bridging programs in the Ontario post-secondary context that focuses on addressing the needs of underrepresented and racialized students in particular, with the most recent dating back to 2016.⁶¹ Despite this gap, there is a foundation of knowledge that should be used to inform some of the important elements of successful bridging programs, which include: (1) adapting programming to local contexts; (2) ongoing support for students to address both financial and non-financial needs; (3) ensuring programming is responsive to diverse student needs; (4) institutional support through resources and commitments to equity; (5) partnerships and collaboration with secondary schools, employment services, and community organizations; (6) ongoing research and evaluation; and (7) awareness and non-stigmatizing communication of bridging programs.⁶² Unfortunately, existing transition and bridging programs often are missing key elements of this foundation. For example, many reportedly have a lack of funding and students are generally uninformed of their existence.⁶³

⁵⁶ Ibid, 20; Jacqueline Stol, Rebecca Houwer, and Sarah Todd, *Bridging Programs: Pathways to Equity in Post-Secondary Education* (Toronto, ON: YouthREX, 2016), <https://youthrex.com/wp-content/uploads/2019/03/YouthREX-Bridging-Programs-Pathways-to-Equity-in-Post-Secondary-Education-RtP.pdf>.

⁵⁷ Kate Rutherford, “International students describe threats, intolerance while in Sudbury,” *CBC*, September 11, 2019, online: <https://www.cbc.ca/news/canada/sudbury/diversity-discrimination-international-students-cambrian-laurentian-1.5256577>; Eric Andrew-Gee, “A faded mosaic: Thunder Bay’s struggle to attract and retain immigrants,” *Globe and Mail*, July 19, 2019, online: <https://www.theglobeandmail.com/canada/article-a-faded-mosaic-thunder-bays-struggle-to-attract-and-retain/>.

⁵⁸ Eternity Martis, “How Post-Secondary Students of Colour Can Feel Safe in Their New Home,” *MacLean’s*, October 8, 2020, <https://www.macleans.ca/education/university-rankings/how-post-secondary-students-of-colour-can-feel-safe-in-their-new-home/>.

⁵⁹ Ibid.

⁶⁰ Stol et al., *Bridging Programs*, 5.

⁶¹ Ibid; John Doran, Amanda K. Ferguson, Gulam A. Khan, Grace Ryu, Dominic Naimool, Mark D. Hanson, and Ruth A. Childs, *What are Ontario’s Universities Doing to Improve Access for Under-represented Groups?* (Higher Education Quality Council of Ontario, 2015).

⁶² Stol et al., *Bridging Programs*, 21-23.

⁶³ Rick Miner, *GTA Post-Secondary Access Initiatives: Pointing the Way to Success* (TD, March 2011), http://www.minerandminer.ca/data/TD_Access_Report.pdf.

Students have developed a number of recommendations that, when taken together, help to address gaps in bridging programming, and will provide one important element of support for racialized and religious students to transition into post-secondary education while navigating the systemic barriers that often lead some to leave, pause, or switch their program or institution. First, the provincial government should reinvest in, and expand, the Ensuring Equitable Access to Postsecondary Education Strategy that was piloted in 2017/2018. This pilot project provided funding for programs “to support at-risk students with transitions to PSE and to see the value of and opportunities in PSE pathways” with a focus on non-financial barriers.⁶⁴ Reinvestments and an expansion of this project would allow the provincial government to provide special ongoing grant funding toward core costs of piloting and continuing post-secondary transition programs that are informed by research and local contexts with the goal of supporting students who face barriers to post-secondary access. These investments should be complemented by investments from post-secondary institutions that focus on supporting retention and successful experiences of racialized and religious students, which the provincial government should incentivize through the inclusion of measurable metrics in the next iteration of Strategic Mandate Agreements.

To support stronger collaboration and partnerships amongst stakeholders and realize the effectiveness of both access and transition programs in supporting racialized and religious students, the Ministry of Colleges and Universities should work with the Ministries of Education and Children, Community and Social Services to integrate access and transition initiatives and ensure they are rooted in the foundational elements listed above and other evidence-based best practices. In particular, transition programs should be dependent on the local context, evidence-based, integrated with the community and throughout the entire education system, connected to secondary and elementary access programs, and built out of a collaboration between university administrators and secondary schools to support existing, or develop new, credit-bearing transition support programs.⁶⁵

Finally, actions need to be taken to enhance and maintain the effectiveness of these programs, which requires research, evaluation, and data collection. To this end, the Higher Education Quality Council of Ontario (HEQCO) should work with institutional and community partners to review existing transition/bridging programs, identify best practices, and develop a framework for transition supports for underrepresented and racialized students upon entry to post-secondary education. In this work, HEQCO should prioritize existing mentorships and transition programming designed by racialized staff and students by including recommendations to better support these previously established initiatives and recognize the work that racialized staff and students have been engaged in. There are also a number of existing programs that have been cited as offering promising practices that could inform HEQCO’s work in this area.⁶⁶ Disaggregated race-based data will also be important to help identify programming to support the transition of racialized students to post-secondary education, particularly where it pertains to student retention and success. To this end, the provincial government should mandate the collection of disaggregated race-based data using the Data Standards for the Identification and Monitoring of Systemic Racism at post-secondary institutions, which can be done through regulation under section 6(5) of the *Anti-Racism Act*.⁶⁷ A more in-depth discussion of race-based data collection and student concerns and recommendations is offered below in the section on “Equity-Based Data”.

⁶⁴ Larlee and McCann, “Ontario’s Education Strategy: Unfinished work, so what’s next?”; Ministry of Education, “Equitable Access to Postsecondary Education – Call for Proposal”.

⁶⁵ Stol et al., *Bridging Programs*; Miner, *GTA Post-Secondary Access Initiatives*; Jean-Paul Restoule, Angela Mashford-Pringle, Maya Chacaby, Christine Smillie, Candace Brunette, and Gail Russel, “Supporting Successful Transitions to Post-Secondary Education for Indigenous Students: Lessons from an Institutional Ethnography in Ontario, Canada,” *The International Indigenous Policy Journal* 4, no. 4 (2013), doi: 10.18584/iipj.2013.4.4.4; Lindsay Thorton, “Preparing Students At-Risk for Successful Transitions into Institutions of Higher Education,” MT research paper (Ontario Institute for Studies in Education of the University of Toronto, 2016), 74.

⁶⁶ Stol et al., *Bridging Programs*.

⁶⁷ *Anti-Racism Act*, S.O. 2017, c. 15; *Anti-Racism Data Standards*, Order in Council 897/2018.

ACADEMIA

DECOLONIZING ACADEMIA

Principle: Decolonizing academia is a critical step to achieving racial equity in post-secondary education.

Principle: Decolonizing academia is a critical step to giving Black, Indigenous, and People of Colour the ability to thrive in post-secondary institutions.

Concern: Academia in its present form is a result of colonization, and a failure to decolonize academia upholds the racist belief that the cultures and knowledge systems of Black, Indigenous, and People of Colour are inferior, and that they do not have value in academic spaces. Furthermore, a failure to decolonize academia upholds these racist beliefs.

Concern: A failure to objectively confront the harmful and dangerous legacy of colonization stifles the success of Indigenization efforts within the post-secondary education system and thwarts efforts to develop all students' racial literacy.

Concern: A failure to objectively confront the harmful and dangerous legacy of colonization can have a traumatic impact on Indigenous students.

Concern: Mandatory equity training may result in retraumatization for Black, Indigenous, and People of Colour.

Recommendation: The provincial government should contract organizations with a deep understanding of decolonizing practices and a demonstrated commitment to decolonizing academia, in responsible and meaningful consultation with faculty and students, to develop best practices and procedures that will guide decolonization efforts in post-secondary institutions.

Recommendation: The provincial government should require, and provide adequate funding for, post-secondary institutions to provide mandatory training using evidence-informed methods for faculty and student-facing staff on anti-racism (particularly anti-Black and anti-Indigenous racism), that reflects lived experiences and is trauma-informed, in order to enhance cultural sensitivity and promote positive classroom experiences for Black and Indigenous students.

Recommendation: The provincial government should create a task force composed of students, staff, administrators, and faculty to develop best practices for responding to disclosures of racial discrimination and reporting processes on university campuses and other pertinent equity matters. The government should also provide funds to enable the task force to raise awareness of reporting channels and measure their success.

Recommendation: The provincial government should mandate the amendment of undergraduate Degree Learning Expectations to require all students to develop competencies in equity and diversity and that any organizations contracted by the government should also develop best practices on how to incorporate equity issues into current curriculum, including Indigenization.

Like almost all other aspects of post-secondary education, racial and religious discrimination is persistent and pervasive in academia. Racialized and religious students face inequities and additional hurdles to excellence as a result of the inherently colonial nature of academia. In Canada, education was used as a colonial tool of assimilation in order to carry out the systematic erasure of Indigenous culture and knowledge systems. The Final Report of the Truth and Reconciliation Commission of Canada (TRC) tells of the goals and impact of residential schools which were specifically designed to colonize the mind, the

heart, and the spirit of Indigenous people.⁶⁸ Ontario's universities are built on Eurocentric and western models of scholarship; developed in the United Kingdom and western Europe.⁶⁹ Most of what is taught in classrooms and lecture halls was designed by Europeans, for Europeans, marginalising other voices, perspectives, and knowledge. The centering of Eurocentric worldviews in academia perpetuates the racist belief that the cultures and knowledge systems of Black, Indigenous and People of Colour are inferior, and that they do not have value in academic spaces. It perpetuates the false assumption that a Eurocentric worldview is universal.

Decolonizing academia is a critical step to achieving racial equity and giving Black, Indigenous, and People of Colour the ability to thrive in their post-secondary life. Decolonizing academia requires “confronting and challenging the colonizing practices that have influenced education in the past, and which are still present today.”⁷⁰ It requires a recognition that academia in its present form is inherently colonial and that efforts to decolonize must be meaningful and disruptive in nature. This involves creating models of scholarship that objectively and critically engage with the legacy of colonialism and decentre knowledge and knowledge production through diversified curriculum and a reconsideration of whose knowledge and ways of knowing are prioritized – it is more than just adding Black and Indigenous authors to course reading lists. It is important to understand that calls for decolonizing academia are not an effort to erase any existing perspectives or knowledge systems in our curriculum, but a rallying call to diversify them. Decolonizing academia is an important foundation to foster greater racial awareness, cultural appreciation, and nuances amongst students of all races and creeds, and for students to develop an ability to critically engage with the present world. It would create a truly enriching academic experience for all students, by broadening students' worldviews and would contribute to supporting the dignity and safety of Indigenous students in particular.

A failure to decolonize academic spaces will hinder Indigenization efforts and limit the ability to develop racial literacy among students. It will mean the further traumatization of Indigenous students and contribute to the emotional toll of navigating colonial spaces with the violence of racism.⁷¹ A failure to decolonize runs the continued risk of academia remaining inaccessible to students who do not fall into a specific identity group and invalidates the experiences of Black, Indigenous and People of Colour in our post-secondary institutions. It is therefore important for the safety of Indigenous students, and to support the excellence of all racialized students.

Decolonizing academia is a call to action, one that is being heard around the world. Decolonization is embedded in the TRC Calls to Action which served as a catalyst for institutional commitments towards the decolonization of academia. While this work is happening at the institutional level, OUSA believes that the provincial government has an important role in supporting these efforts. Specifically, OUSA asks that the provincial government engage in consultation, provide funding, and articulate educational standards as outlined in the following recommendations.

First, OUSA asks that the provincial government contract organizations with a deep understanding of decolonizing practices and a demonstrated commitment to decolonizing academia – such as the Council of Ontario Universities' Reference Group on Aboriginal Education or the Ontario Black History Society, which has done this work at the K-12 level – in responsible and meaningful consultation with faculty and students, to develop best practices and procedures that will guide decolonization efforts in post-secondary institutions. The process should include an evaluation of current teaching practices to identify areas that perpetuate colonial mindsets and that are deemed harmful by Indigenous, Black, and other racialized students, and should occur before creating any new procedures or practices. Consideration should be made for the Indigenization of curriculum under the leadership of Indigenous scholars, students, and

⁶⁸ Centre for Youth and Society, “Decolonization in an Educational Context,” *University of Victoria*, n.d., <https://www.uvic.ca/research/centres/youthsociety/assets/docs/briefs/decolonizing-education-research-brief.pdf>.

⁶⁹ Ben Lewis, “Editorial Matters: A Time For Action,” *Academic Matters*, May 19, 2019, <https://academicmatters.ca/editorial-matters-a-time-for-action/>.

⁷⁰ Frances James, “Why We Need to Talk About the Decolonization of Higher Education,” *QS Quacquarelli Symonds*, January 29, 2020, <https://www.qs.com/why-we-need-to-talk-about-the-decolonization-of-higher-education/>.

⁷¹ Sheila Cote-Meek, *Colonized Classrooms: Racism, Trauma and Resistance in Post-Secondary Education* (Fernwood Publishing, April 2014).

community leaders, as well as the introduction of courses that explore anti-Black racism in Canada as well as the history of Black Canadians.

Second, the provincial government should require, and provide adequate funding for, post-secondary institutions to implement mandatory training on anti-racism – with particular attention to tackling anti-Black and anti-Indigenous racism – for full-time and part-time faculty and student-facing staff. This training should be developed using evidence-informed methods, reflect lived experiences, and be trauma-informed with a goal of enhancing cultural sensitivity and promoting positive classroom experiences for Black and Indigenous students. It is critical that this training be rooted in evidence-informed methods and attentive to any unintended harms that may result from the mandatory nature of such training. Furthermore, mandatory training should include opt-out options for person with lived experiences to prevent re-traumatization.

Third, the provincial government should create a task force composed of students, staff, administrators, and faculty to develop best practices for responding to disclosures and reporting processes on university campuses for experiences of racial discrimination and other pertinent equity matters. The government should also provide funds to enable the task force to raise awareness of reporting channels and measure their success. It is important that the composition of the task force reflect the diversity of racialized and religious students, staff, administrators, and faculty at post-secondary institutions in the province, and that efforts be made to avoid tokenization. Task force members should be paid equitably for their time and the emotional labour of this work.

Finally, the provincial government should mandate the amendment of undergraduate Degree Learning Expectations⁷² to require all students to develop competencies in equity and diversity and that any organizations contracted by the government should also develop best practices on how to incorporate equity issues into current curriculum, including Indigenization. This is an important step as it prioritizes equity and diversity as key competencies to inform the development of educational programs and recognizes their importance in the quality of education at post-secondary institutions. It is also a way to provide new graduates with the tools they need to articulate these competencies to potential employers in a way that will be recognized and valued, ultimately fostering a society-wide culture of equity and diversity.

DIVERSITY & REPRESENTATION

Principle: Faculty, staff, and student diversity enriches the educational experiences of all post-secondary students.

Principle: Collection of race-based data in post-secondary institutions is a critical first step in overcoming systemic barriers for Black, Indigenous, and People of Colour.

Concern: Black and Indigenous full-time faculty and senior leadership are severely underrepresented in post-secondary institutions.

Concern: The unique or exacerbated barriers to accessing post-secondary education for Black and Indigenous students can hinder equitable representation.

Concern: The considerable absence of race-based data in post-secondary institutions severely hampers efforts to address systemic racism and stifles the effectiveness of policies, programs, and services developed for Black, Indigenous, and People of Colour.

Concern: Black, Indigenous, and People of Colour face barriers to attaining tenured positions. This disproportionately affects Black and Indigenous persons to an elevated degree.

⁷² *Ensuring the Value of University Degrees in Ontario: A Guide to Learning Outcomes, Degree Level Expectations, and the Quality Assurance Process in Ontario* (Council of Ontario Universities, 2015).

Recommendation: The provincial government should create a fund for post-secondary institutions to conduct equity audits that will help identify equity gaps in institutional hiring and retention practices, and inform the creation of policy, programs, and services to be developed for Black, Indigenous, and People of Colour.

It is becoming more widely understood that faculty, staff, and student diversity enriches the educational experiences of all post-secondary students and promotes excellence among all who are part of a university community.⁷³ Faculty and staff diversity is particularly important to racialized students who are more likely to feel isolated and discouraged if they do not see themselves represented.⁷⁴ Having a diverse faculty creates a positive learning experience for all students, and creates opportunities for racialized students to continue and thrive in their academic careers.⁷⁵

However, Black and Indigenous people are severely underrepresented in full-time faculty and senior leadership positions.⁷⁶ For example, only 1.4 percent of all university professors in Canada are Indigenous, compared to 3.8 percent of Indigenous workers in the total labour force, and 5 percent of undergraduate university students who identify as Indigenous; only 2.0 percent of university teachers are Black, compared to 3.1 percent of the overall labour force.⁷⁷ Additionally, racialized people only make up 8 percent of senior leadership positions.⁷⁸ Some of this disparity can be attributed to access barriers that racialized students face that prevent them from beginning an academic career (see “Access”, above), but there are also qualified individuals who are not recruited or who are passed over for opportunities due to biases and systemic barriers.⁷⁹ These same barriers can prevent Black and Indigenous faculty from attaining tenured positions, which can mean more precarious work and lower retention rates.⁸⁰

To support post-secondary institutions in addressing the underrepresentation of Black, Indigenous, and People of Colour in faculty, included tenured-faculty, and senior leadership and administrative positions, OUSA recommends that that provincial government provide funding for equity audits of institutional hiring and retention practices. Equity audits are a tool for post-secondary institutions to better understand equity gaps and identify practices that are preventing the inclusion of Black, Indigenous, and People of Colour in these spaces – an example of funding and legislation on equity audits in higher education can be found in California’s *College Equity Act of 2019*.⁸¹ These equity audits should be complemented by the collection of equity-based data according to the recommendations made in the “Equity-Based Data” section, below, as equity-based data is essential to address the effectiveness of policies, programs, and services. Following the completion of an institutional equity audit, findings should be used to inform the creation of targeted and effective policy, programs, and services to address identified gaps and areas of concern. These outcomes should be institution-specific but may align across the sector. For example, “cluster hiring” – a practice whereby institutions “[p]rioritize and invest in multiple positions in a broad field, or across a range of related fields, rather than hiring faculty members one by one in specific subfields”⁸² – may be identified as a potential tool to increase representation in

⁷³ Anya Zoledziowski, “Canada’s Top Researcher Positions Continue to Lack Diversity, U of A Study Finds,” *CBC News*, July 13, 2019, <https://www.cbc.ca/news/canada/edmonton/researcher-diversity-study-1.5207654>; Zoledziowski, “Lack of Faculty Diversity Can Affect Studies and Career Aspirations”; Moira MacDonald, “Statistics Canada Wants *You* – For a New Survey on Faculty Diversity,” *University Affairs*, November 13, 2019, <https://www.universityaffairs.ca/news/news-article/statistics-canada-wants-you-for-a-new-survey-on-faculty-diversity/>.

⁷⁴ Zoledziowski, “Lack of Faculty Diversity Can Affect Studies and Career Aspirations”.

⁷⁵ *Ibid.*

⁷⁶ Henry et al., “Race, Racialization and Indigeneity in Canadian Universities”; Zoledziowski, “Lack of Faculty Diversity Can Affect Studies and Career Aspirations”.

⁷⁷ *Underrepresented & Underpaid: Diversity & Equity Among Canada’s Post-Secondary Education Teachers*, 2.

⁷⁸ *Equity, Diversity, and Inclusion at Canadian Universities*, 10.

⁷⁹ Zoledziowski, “Canada’s Top Researcher Positions Continue to Lack Diversity, U of A Study Finds”.

⁸⁰ *Underrepresented & Underpaid: Diversity & Equity Among Canada’s Post-Secondary Education Teachers*, 2.

⁸¹ Rosa Garcia, “Equity Audits Would Strengthen Colleges and Universities,” *The Center for Law and Social Policy*, June 19, 2019, <https://www.clasp.org/blog/equity-audits-would-strengthen-colleges-and-universities>.

⁸² Carla Freeman, “The Case for Cluster Hiring to Diversify Your Faculty,” *The Chronicle of Higher Education*, October 9, 2019, <https://www.chronicle.com/article/the-case-for-cluster-hiring-to-diversify-your-faculty/>.

faculty positions.⁸³

HATE SPEECH

Principle: Academic freedom should not be used as a veil to further, or means to entrench, racial prejudice.

Principle: All post-secondary students deserve a safe, dignified, and trauma-free post-secondary experience.

Principle: Principles on freedom of expression in the *Canadian Charter of Rights and Freedoms* should be upheld on Ontario post-secondary campuses.

Concern: The use of racial slurs and other expressions of hate speech in academic settings, course content, and learning materials, may induce adverse physiological and psychological effects on students that identify as Black, Indigenous, or People of Colour.

Concern: Use of racial slurs and other expressions of hate speech by instructors, regardless of the context in which they are used, may create a hostile academic environment for students.

Concern: Degree requirements for mandatory Indigenous credits may breed resentment in the student community.

Concern: There have been instances where academic freedom has been a veil to project racial animus in academic settings.

Recommendation: The provincial government should mandate that post-secondary institutions create policies, in responsible and meaningful consultation with faculty, staff, and students, on the use of racial slurs, hateful rhetoric, that are trauma-informed and consider historical context.

Recommendation: The provincial government should mandate that post-secondary institutions make trauma-informed and anonymous reporting mechanisms available for all students who experience harm in the classroom (or online) as a result of course content and/or interactions with fellow students, faculty, and staff.

Recommendation: The provincial government should require post-secondary institutions to provide mandatory training for faculty, staff, and students on anti-racism that reflects lived experiences and is trauma-informed, in order to enhance cultural sensitivity and promote positive academic experiences, particularly for Black, Indigenous, and People of Colour.

Freedom of speech and of expression are valued principles in Canada, and post-secondary institutions are vital spaces for the exercise of free speech and expression through debate, discourse, and learning. In exercising these freedoms, however, it is important that everyone, including those who are part of a post-secondary community, remain cognizant of the *Canadian Charter of Rights and Freedoms* and the limits of the right to freedom of speech and expression. These include but are not limited to: threats of violence; hate speech as defined by the Supreme Court of Canada in *R v Keegstra* (i.e., the wilful promotion of hatred against an identifiable group);⁸⁴ direct harassment of an individual or individuals; threats to the physical security of an individual or community; violation of privacy consistent with *Freedom of Information and Protection of Privacy Act*; and false defamation of an individual consistent with the *Libel and Slander Act*. Ultimately, while freedom of speech and expression are important for society

⁸³ Colleen Flaherty, "Cluster Hiring and Diversity," *Inside Higher Ed*, May 1, 2015, <https://www.insidehighered.com/news/2015/05/01/new-report-says-cluster-hiring-can-lead-increased-faculty-diversity>.

⁸⁴ *R v Keegstra*, [1990] 3 SCR 697.

broadly, and post-secondary institutions in particular, these principles should not, and cannot, be used as vehicles to allow violence, hate speech, or harassment.

Protections against hate speech are important, not only because they are embedded in Canadian law, but also because they have no place in our society or institutions. All students deserve a safe, dignified, and trauma-free post-secondary experience, and the use of hate speech or racial or religious slurs infringe on this. OUSA believes that the use of racial or religious slurs and other expressions of hate speech have no place in academic settings, including in-person and virtual settings, no matter who uses them. Black, Indigenous, and People of Colour at post-secondary institutions have expressed the harm caused by the use of racial slurs in academic settings, saying they felt uncomfortable, “stripped of dignity,” and “deeply humiliated.”⁸⁵ There is also a known connection between experiences of racism and adverse mental health outcomes, suggesting that the use of racial slurs and other expressions of hate speech in academic settings, course content, and learning materials, may induce adverse physiological and psychological effects on students that identify as Black, Indigenous, or People of Colour.⁸⁶ Some instructors have claimed that the prohibition on the use of racial or religious slurs in the classroom limits academic freedom,⁸⁷ but OUSA believes that academic freedom should not be used as a veil to further, or mean to entrench, racial or religious prejudice. Claiming academic freedom and ignoring the concerns of Black, Indigenous, and other racialized students and faculty invalidates their lived experiences, compromises their mental health, and undermines the quality of their educational experience. It also risks reducing post-secondary institutions to trauma-inducing environments.

The provincial government should mandate that post-secondary institutions create policies, in responsible and meaningful consultation with faculty, staff, and students, on the use of racial slurs and hateful rhetoric, that are trauma-informed and consider historical context. This will allow individual institutions to retain autonomy but introduce a standard that incorporates a trauma-informed lens and considers historical context. Any guidelines and policies should consider that negative interactions might not always occur through course content or in the classroom and that there is always the possibility that racialized faculty and staff can also experience harm. Importantly, policies and guidelines should be attentive to the discrimination and hate rhetoric that students have shared and emerged in response to degree requirements for mandatory Indigenous credits.

Additionally, it is important that students, faculty, and staff have a clear avenue for recourse when they encounter hateful rhetoric or hate speech in the classroom. Recent examples from universities in Ontario, including the University of Windsor, Western University, and the University of Ottawa, demonstrate gaps in available complaint pathways as students have turned to the media and public discourse for some measure of accountability.⁸⁸ To address this gap, the provincial government should mandate that post-secondary institutions make trauma-informed and anonymous reporting mechanisms available for all students who experience harm in the classroom (or online) as a result of course content and/or interactions with fellow students, faculty, and staff. It is important that reporting mechanisms mandated

⁸⁵ Shannon Dea, “Academic Freedom and the N-Word,” *University Affairs*, August 21, 2020, <https://www.universityaffairs.ca/opinion/dispatches-academic-freedom/academic-freedom-and-the-n-word/>; “Students Call for Systemic Change in Wake of N-Word Controversy at University of Ottawa,” *CBC News*, October 23, 2020, <https://www.cbc.ca/radio/thecurrent/the-current-for-oct-23-2020-1.5772694/students-call-for-systemic-change-in-wake-of-n-word-controversy-at-university-of-ottawa-1.5774034>; Sofia Rodriguez, “‘He Stripped Us of Our Dignity,’ Western University Student Says of Prof Who Used N-Word in Class,” *CBC News*, October 29, 2019, <https://www.cbc.ca/news/canada/london/western-prof-uses-n-word-1.5338315>.

⁸⁶ Kwasi Kafele, *Racial Discrimination and Mental Health in Racialized and Aboriginal Communities* (Ontario Human Rights Commission, December 2004); David R. Williams, “Stress and the Mental Health of Populations of Color: Advancing Our Understanding of Race-related Stressors,” *Journal of Health and Social Behaviour* 59, no. 4 (2018):466-485, doi: 10.1177/0022146518814251; “Physiological & Psychological Impact of Racism and Discrimination for African-Americans,” *American Psychological Association*, accessed April 28, 2021, <https://www.apa.org/pi/oema/resources/ethnicity-health/racism-stress>.

⁸⁷ See, for example: Laura Glowacki, “Students Decry Letter Defending N-Word Use at the University of Ottawa,” *CBC News*, October 20, 2020, <https://www.cbc.ca/news/canada/ottawa/university-of-ottawa-professor-racism-1.5768730>.

⁸⁸ “Students Call for Systemic Change in Wake of N-Word Controversy at University of Ottawa”; Rodriguez, “‘He Stripped Us of Our Dignity,’ Western University Student Says of Prof Who Used N-Word in Class”; Jennifer La Grassa and Tahmina Aziz, “Some Students and Faculty Outraged After UWindsor Prof Uses N-Word During Class,” *CBC News*, October 30, 2020, <https://www.cbc.ca/news/canada/windsor/university-windsor-professor-anti-black-racism-1.5782461>.

by the province take into consideration the power dynamics between students, their instructors, and institutions, and that these power dynamics might deter from reporting instances of hate speech. Additionally, it ought to be a requirement that students are made aware of reporting mechanisms and that their effectiveness is measured.

Finally, the provincial government should require post-secondary institutions to provide mandatory training for faculty, staff, and students on anti-racism that reflects lived experiences and is trauma-informed, in order to enhance cultural sensitivity and promote positive academic experiences, particularly for Black, Indigenous, and People of Colour. This training should be evidence-informed to support effectiveness, and context-dependent. Importantly, it should include content that speaks to the multitude of experiences of racism and religious discrimination and the experiences of those who are subject to these forms of hate. For example, in the context of COVID-19, it is particularly important to include anti-Asian racism which has increased exponentially.⁸⁹

STUDENT SUPPORTS

Principle: Post-secondary institutions must cultivate a safe and inclusive environment for all students.

Principle: All students regardless of racial or religious identity should have equitable access to, and experiences with, student support services on post-secondary campuses.

Principle: Indigenous Student Centres and Associations on university campuses are critical for providing culturally relevant supports for Indigenous students.

Concern: Racialized students disproportionately experience both covert and overt racism in their interactions with student support services on campus.

Concern: The lack of research on student interactions and experiences with student support services on post-secondary campuses undermines post-secondary institutions' ability to effectively identify, validate, and address concerns that racialized and religious students face in their interactions with student support services on campus.

Concern: There is a lack of mandatory equity, diversity, and inclusion training provided to student-facing post-secondary staff.

Concern: There is a lack of funding for services that provide support specifically to racialized and religious students.

Concern: Student groups and clubs have been forced to bear the weight of providing sufficient support to racialized and religious students due to inadequate university student support services.

Concern: Funding for Indigenous Students Centres on post-secondary campuses is inadequate and inconsistent.

Recommendation: The provincial government should direct the Higher Education Quality Council of Ontario to collaborate with post-secondary institutions and other relevant stakeholders to conduct research into best practices on cultivating and integrating a culture of equity, diversity, and inclusion within post-secondary communities and student support services.

Recommendation: The provincial government should mandate that post-secondary institutions

⁸⁹ *A Year of Racist Attacks: Anti-Asian Racism Across Canada One Year Into the COVID-19 Pandemic* (Chinese Canadian National Council: Toronto Chapter, 2021), <https://www.ccnctoronto.ca/oneyear>.

implement re-occurring, mandatory equity, diversity, and inclusion training and ongoing education opportunities for all student-facing staff and volunteers.

Recommendation: The provincial government should provide envelope funding to programs, services, and offices that provide specific support to racialized and religious students at post-secondary institutions.

Recommendation: The provincial government should mandate that post-secondary institutions evaluate, using standardized metrics, the effectiveness of their equity, diversity, and inclusion policies in addressing students' concerns as it relates to student support services.

Recommendation: The provincial government should provide increased and ongoing funding for Indigenous Student Centres through the Postsecondary Education Fund for Aboriginal Learners, without the need for recurring grant applications.

Student support services and programs play an important role in cultivating a safe and inclusive environment for all students. They offer resources to students to support them in multiple facets of their post-secondary life, including academic support, career services, health and wellness services, accessibility services, and housing support. They can also provide more targeted supports, such as those for international students or Indigenous students. It is therefore important that all students have equitable access to, and experiences with, student support services and programs.

However, during consultations with students at OUSA member schools, students shared that they have experienced racism when interacting with different student support services on their campuses. This is concerning because it is harmful to the students who have these experiences and can increase feelings of alienation and reduce willingness to access these services, which means that racialized students have less access to necessary supports compared to their non-racialized peers.⁹⁰ Additionally, students have shared that there are gaps in services and programming targeting racialized students specifically, and those that do exist lack necessary funding. As a result, student groups and clubs have been forced to fill this gap, taking on added labour, with limited institutional or financial support. For example, Indigenous Student Centres and Associations – including those run by staff and students – are critical to providing culturally relevant supports for Indigenous students, yet funding for these services is inadequate and inconsistent. This is compounded by the fact that there is limited research on student interactions and experiences with services on post-secondary campuses which undermines post-secondary institutions' ability to effectively identify, validate, and address concerns that racialized and religious students face in their interactions with services on campus.

As a first step, it is important to understand student concerns and appropriate interventions for post-secondary institutions to effectively identify, validate, and address these concerns. To this end, OUSA recommends that the Higher Education Quality Council of Ontario (HEQCO) collaborate with post-secondary institutions and other relevant stakeholders to conduct research into best practices on cultivating and integrating a culture of equity, diversity, and inclusion within post-secondary communities and student services. This research should be inclusive of the experiences of racialized and religious students with the multitude of students support services they may interact with and seek to understand their needs as service users or potential service users. This research can be used to inform immediate and long-term improvements to student support services.

While there is a need for a more comprehensive understanding of the student support service landscape and the experiences of racialized and religious students within it, consultations with students and staff have highlighted two main gaps and potential solutions that can be implemented now. First, students and staff have noted that there is a lack of mandatory equity, diversity, and inclusion training provided to student-facing post-secondary staff and volunteers, which includes any staff or volunteer position that has some variation of “interactions with students” in their job description, or who interacts with students as

⁹⁰ Hassina Alizai, “Impact of Islamophobia on Post-Secondary Muslim Students Attending Ontario Universities,” *Electronic Thesis and Dissertation Repository* (4176), 2017, <https://ir.lib.uwo.ca/etd/4716/>.

part of their regular duties. Students and staff both recognize the challenges with mandatory training of this type, and that it is not the panacea for student concerns, but it is one piece of a broader framework for change. However, it is also important that, until HEQCO has conducted their research – which may provide some guidance for the most effective approach to improving staff conduct and interactions – this training be provided so that all staff and volunteers have a base-level of knowledge. To this end, OUSA recommends that the provincial government mandate that post-secondary institutions implement re-occurring, mandatory equity, diversity, and inclusion training and ongoing education opportunities for all student-facing staff and volunteers. To address efficacy concerns, this training should go beyond what is typically understood as “diversity training” and include more comprehensive and varied educational opportunities.⁹¹ It should involve active engagement from participants. This training should be repeated by staff as changes are made in their fields, new best practices are developed, and additional competencies are required. The ongoing nature of this training should be reflected in sessions that build on previous learnings.

The second known gap is the lack of funding for student support services, including both student and institutionally run programs, services, and offices. This gap has been cited by students and staff as a particular concern for student services that provide targeted support for racialized and religious students. To address this gap, the provincial government should provide envelope funding to programs, services, and offices that provide specific support to racialized and religious students at post-secondary institutions. Additionally, the provincial government should provide increased and ongoing funding for Indigenous Student Centres through the Postsecondary Education Fund for Aboriginal Learners (PFAL), without the need for recurring grant applications. OUSA has heard consistent cross-institution concerns from Indigenous Student Centre staff about the inadequacy in existing funding and the barriers that the current funding framework – PFAL – imposes on their ability to provide essential services to Indigenous students on their campuses. Specifically, staff have cited that this funding is unreliable and the process to access it is unduly burdensome as it is only offered on a year-to-year basis and requires staff to complete a complicated and lengthy end-of-year report. This is a particular issue for these services as the funding provided through PFAL is limited and many are overworked and understaffed.

Finally, it is important that the policies and practices post-secondary institutions have in place to support racial and religious equity in student support services are effective. This requires ongoing evaluation by post-secondary institutions, as well as standardized metrics to guide these evaluations in order to support accountability. These metrics should be broad enough to account for unique institutional contexts and characteristics, but also demonstrate a degree of universality that allows for sector-wide analysis and identification of best-practices, e.g., “student satisfaction”. Therefore, the provincial government should mandate that post-secondary institutions evaluate, using standardized metrics, the effectiveness of their equity, diversity, and inclusion policies in addressing students’ concerns as it relates to student support services.

PROVISION OF HEALTH SERVICES

Principle: Students from racialized and religious groups should have access to health care services that are culturally relevant and sensitive and that are able to meet their diverse identities and needs.

Principle: All students should be made to feel comfortable when accessing and using health care services on campus.

Concern: Racialized and religious students often face implicit bias when accessing health care services when compared to their peers.

Concern: Black, Indigenous, and People of Colour disproportionately face significant physical and mental health outcomes, compounded by systemic barriers to accessing health services and resources.

⁹¹ Amna Khalid and Jeffrey Aaron Snider, “Why Diversity Training on Campus is Likely to Disappoint,” *The Conversation*, August 5, 2020, <https://theconversation.com/why-diversity-training-on-campus-is-likely-to-disappoint-143644>.

Concern: There is a lack of research available on racialized students' interactions and experiences with health care services on post-secondary campuses.

Concern: Racialized and religious students face difficulties obtaining a standardized level of mental health care due to non-racialized and untrained counsellors lacking an understanding of cultural or religious factors that may be at play.

Concern: The lack of Black and Indigenous medical professionals further exacerbates the lack of understanding of the effects of systemic racism on Black, Indigenous, and students of colour.

Concern: Black and Indigenous students in health care programs may experience racism from students and instructors, and in course content, and lack adequate support.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario with conducting research into equity, diversity, and inclusion issues present in student wellness centres and examine best practices for offering equitable physical and mental health services to students.

Recommendation: The provincial government should mandate that all student-facing health services staff undergo mandatory, re-occurring equity, diversity, and inclusion training and ongoing education opportunities.

Recommendation: The provincial government should allocate a certain portion of post-secondary mental health care funding to the hiring of more racialized staff who can better understand and address the unique perspective and needs of racialized students.

Recommendation: The provincial government should provide funding for community-based mental health care providers to supply culturally relevant and diverse counselling and support groups for post-secondary students.

Recommendation: The provincial government should mandate that post-secondary institutions develop support programs for underrepresented racialized students attending and applying to health care programs.

Access to health services is a critical factor in the wellbeing of post-secondary students, and all students should be able to access the care they need and feel safe and comfortable doing so. This requires the availability of health services that are culturally relevant and sensitive, and able to meet the needs of students from a multitude of identities. It also requires a diverse complement of staff who actively work against their own internal biases and strive to provide a safe and inclusive level of care. This is especially important for Black, Indigenous, and People of Colour who disproportionately face negative physical and mental health outcomes as a result of systemic racism, and perpetuated by systemic barriers to accessing health services and resources.⁹²

During consultations with students at OUSA member schools, students shared a number of concerns that hinder their ability to access care, including that they have faced implicit bias from staff. This is harmful to the students who have these experiences, can result in the provision of a lower level of care, and ultimately reduces willingness to access these services, which means that racialized students have less access to necessary health care supports, further exacerbating the already disproportionate negative

⁹² Kelly Chia, "How disparities in health care hurt Black and Indigenous peoples," *The Peak*, September 7, 2020, <https://the-peak.ca/2020/09/how-disparities-in-health-care-hurt-black-and-indigenous-peoples/>; Statistics Canada, "First Nations people, Métis and Inuit and COVID-19: Health and social characteristics," *The Daily*, April 17, 2020, <https://www150.statcan.gc.ca/n1/daily-quotidien/200417/dq200417b-eng.htm>; Thomas G. McGuire and Jeanna Miranda, "Racial and Ethnic Disparities in Mental Health Care: Evidence and Policy Implications," *Health Aff (Millwood)* 27, no. 2 (Mar-Apr 2008): 393-403, doi: 10.1377/hlthaff.27.2.393; Jo C. Phelan and Bruce G. Link, "Is Racism a Fundamental Cause of Inequalities in Health?," *Annual Review of Sociology* 41, (August 2015): 311-330, <https://doi.org/10.1146/annurev-soc-073014-112305>.

health outcomes experienced by these students.⁹³ This is compounded by the fact that there is limited research on student interactions and experiences with health services on post-secondary campuses which undermines post-secondary institutions' ability to effectively identify, validate, and address concerns that racialized and religious students face in their interactions with health services on campus.

As a first step, it is important to understand student concerns and appropriate interventions for post-secondary institutions to effectively identify, validate, and address these concerns. To this end, OUSA recommends that the Higher Education Quality Council of Ontario (HEQCO) conduct research into best practices on equity, diversity, and inclusion issues in student health and wellness services and best practices to ensure all students have access to equitable physical and mental health services. This research should be inclusive of the varied experiences of racialized and religious students with health and wellness services, as well as barriers to access. This research can be used to inform immediate and long-term improvements to student health and wellness services. While there is a need for a more comprehensive understanding of the experiences of racialized and religious students accessing health services on campus, consultations with students and staff have highlighted three main gaps and potential solutions that can be implemented now.

First, students and staff have noted that there is a lack of mandatory equity, diversity, and inclusion training provided to student-facing health services staff. Students and staff both recognize the challenges with mandatory training of this type, and that it is not the panacea for student concerns, but it is one piece of a broader framework for change. However, it is also important that, until HEQCO has conducted their research – which may provide some guidance for the most effective approach to improving staff conduct and interactions – this training be provided so that all staff and volunteers have a base-level of knowledge. To this end, OUSA recommends that the provincial government mandate that post-secondary institutions implement re-occurring mandatory equity, diversity, and inclusion training and ongoing education opportunities for all student-facing staff and volunteers. To address efficacy concerns, this training should go beyond what is typically understood as “diversity training” and include more comprehensive and varied educational opportunities.⁹⁴ It should involve active engagement from participants. This training should be repeated by staff as changes are made in the health and wellness sector, new best practices are developed, and additional competencies are required. The ongoing nature of this training should be reflected in sessions that build on previous learnings.

The second gap is the underrepresentation of Black and Indigenous medical professionals.⁹⁵ Employing Black and Indigenous people in health care positions is an important way to mitigate against the implicit biases that hinder the care provided to Black and Indigenous students. It also helps to address some of the distrust held by Black and Indigenous communities with the medical system as a result of the ongoing history of systemic racism which ultimately hinders access.⁹⁶ Students have shared the importance of being represented in the professionals they seek care from, particularly when it comes to their mental health. Not only does Black and Indigenous representation in mental health care positions help to increase trust, but it supports Black and Indigenous students to access care that is more attentive to the impact of systemic racism on their health. (Importantly, non-Black and Indigenous health care professionals should understand these factors as well; see above). For example, students have shared that there is a prevalent use of Cognitive Behavioural Therapy (CBT) in post-secondary mental health care. However, CBT does not account for the impact of cultures of oppression and racism on participants which is limiting for students who are facing increased mental health challenges due to this type of harm.⁹⁷ CBT is also not a culturally relevant intervention for all participants, which may be better understood by Black

⁹³ Chia, “How disparities in health care hurt Black and Indigenous peoples”.

⁹⁴ Khalid and Snider, “Why Diversity Training on Campus is Likely to Disappoint”.

⁹⁵ Jane Cooper and Erin Macpherson, “Why Indigenous Health Professionals Matter,” *Conference Board of Canada*, accessed April 27, 2021, <https://www.conferenceboard.ca/focus-areas/indigenous-northern-communities/why-indigenous-health-professionals-matter>; “We Need to Ensure a Cultural Shift: U of T’s Onye Nnorom on Why Canada Needs More Black Physicians,” *U of T News*, June 17, 2020, <https://www.utoronto.ca/news/we-need-ensure-cultural-shift-u-t-s-onye-nnorom-why-canada-needs-more-black-physicians>.

⁹⁶ Chia, “How disparities in health care hurt Black and Indigenous peoples”.

⁹⁷ Pamela A. Hays, “Introduction,” in *Culturally Responsive Cognitive Behavior Therapy, Second Edition: Practice and Supervision*, eds. G. Y. Iwamasa and P. A. Hays (American Psychological Association, 2019): 3-24.

and Indigenous mental health care providers.

To support racialized students to access safe, culturally relevant health care services that reflect their needs, the provincial government should allocate a certain portion of post-secondary mental health care funding to the hiring of more racialized staff. This funding could come from the Mental Health Worker Fund and should support proportional representation so that students who are seeking representative care are not limited in their options or face access barriers as a result of understaffing. Having proportional representation in mental health care services allows students to access the care they need and diversifying mental health care services is one way to create spaces that are more inclusive for all students. Additionally, as not all students will feel comfortable accessing or be able to access services on campus, it is important that community-based mental health providers be able to meet their needs. Therefore, OUSA recommends that the provincial government provide funding for community-based mental health providers to supply culturally relevant and diverse counselling and support groups for post-secondary students. For example, community-based mental health care providers could use this funding to offer support groups for post-secondary students with shared cultural experiences to provide support for race- or religion-based violence or trauma, such as antisemitism, Islamophobia, Xenophobia, anti-Asian racism, anti-Black racism, and anti-Indigenous racism.

Finally, it is important to recognize that one of the barriers to Black and Indigenous representation in health care roles is the racism and discrimination in health care education and training programs. This is a pervasive issue that is rooted in systemic racism and a history of intentional exclusion. For example, Queen's University banned Black students from enrolling in its medical school in 1918 and did not officially repeal the ban until 2018.⁹⁸ Not only are there barriers to entry, but once admitted to health care programs, Black and Indigenous students experience racism in their programs, both from instructors, course content, other students, and in their clinical placements.⁹⁹ This can result in barriers to success in, and completion of, these programs. It is therefore important that, in addition to institutional and program systemic change, students have access to support needed to mitigate the harm they experience in their programs so that they can thrive. To this end, the provincial government should mandate that post-secondary institutions develop support programs for underrepresented racialized students attending and applying to health care programs. These support programs should be attentive to the specific needs of the students in their programs and institutions, and therefore students should be included in decision-making about what these programs look like on their campuses, and institutions should be prepared to develop and offer programs that meet their students' needs, including, but not limited to, culturally relevant mental health support, counselling, or peer groups.

CAMPUS CLIMATE

RACISM & DISCRIMINATION

Principle: All post-secondary students deserve a safe, dignified, and trauma-free post-secondary experience.

Principle: Post-secondary institutions have a responsibility to address the prevalence of racial and religious discrimination.

Concern: There is an upsurge in Islamophobia, antisemitism, Xenophobia, anti-Asian racism, and anti-Black racism across Canada which leaves many students vulnerable to bullying, threatening behaviour, and violence.

⁹⁸ Wendy Glauser, "When Black Medical Students Weren't Welcome at Queen's," *University Affairs*, February 19, 2020, <https://www.universityaffairs.ca/features/feature-article/when-black-medical-students-werent-welcome-at-queens/>.

⁹⁹ Ibid; Chika Stacey Oriuwa, "Chika Stacey Oriuwa: 'In My White Coat, I'm More Black Than Ever,'" *Flare*, January 31, 2019; Shanna Peltier and Yotakahron Jonathan, *Heartberry Podcast*, podcast, <https://www.heartberrypodcast.com/>.

Concern: There is a lack of research on religious discrimination, in particular Islamophobia and antisemitism, and its effects in both post-secondary institutions and wider society.

Concern: There is a lack of research on anti-Asian racism and Sinophobia, and their effects in both post-secondary institutions and wider society.

Concern: ‘Positive’ stereotypes and the model minority myth can be used to deny the existence of anti-Asian racism.

Concern: The lack of research surrounding the impact of the model minority myth on both ‘model minorities’ and other racial minority groups leave institutions ill-equipped to tackle this specific manifestation of racism.

Concern: Due to Western language and media surrounding the COVID-19 pandemic, there has been a sharp increase in Sinophobia and anti-Asian racism, particularly toward Chinese international students.

Recommendation: The provincial government should mandate that post-secondary institutions make trauma-informed and anonymous reporting mechanisms available for all students who experience racial and religious discrimination in post-secondary institutions.

Recommendation: The provincial government should provide funding for research on religious discrimination and its effects in post-secondary institutions, with a focus on antisemitism and Islamophobia.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario with conducting research on racism towards the Asian and Pacific Islander communities and its effects in post-secondary institutions.

Recommendation: The provincial government should use this research to create best practices to inform institutional responses and policies to address religious discrimination on post-secondary institutions.

All post-secondary students deserve a safe, dignified, and trauma-free post-secondary experience, but many are unable to experience this due to the ongoing, and increasing, prevalence of racism and various forms of discrimination. In particular, students are concerned about the rising incidents relating to Islamophobia, antisemitism, Xenophobia, anti-Asian racism, and anti-Black racism and the impact this has on their physical and mental safety.¹⁰⁰ While many of these experiences go undocumented, the rates of racially-motivated hate crimes in Ontario illustrates the severity of the problem. In 2019, reported hate crimes in Canada occurred disproportionately in Ontario country – among the top ten cities with the highest police-reported hate crimes, five of these cities were located in Ontario.¹⁰¹

While hate crimes have generally been rising, those that target Muslim, Jewish, Asian, and Black

¹⁰⁰ Alizai, “Impact of Islamophobia on Post-Secondary Muslim Students Attending Ontario Universities”; *Helping Students Deal with Trauma Related to Geopolitical Violence & Islamophobia* (Islamic Social Services Association and National Council of Canadian Muslims, 2016), <https://www.nccm.ca/wp-content/uploads/2016/08/ED-GUIDE-ENGLISH-BOOK.pdf>; Jacques Boissinot, “Islamophobia and hate crimes continue to rise in Canada,” *The Conversation*, February 6, 2019, <https://theconversation.com/islamophobia-and-hate-crimes-continue-to-rise-in-canada-110635>; Khaled Al-Qazza, “Islamophobia is on the rise during COVID-19,” *Policy Options*, October 1, 2020, <https://policyoptions.irpp.org/magazines/october-2020/islamophobia-is-on-the-rise-during-covid-19/>; Terry Haig, “Anti-Semitic Incidents Continue to Increase in Canada,” *Radio Canada International*, April 28, 2020, <https://www.rcinet.ca/en/2020/04/28/anti-semetic-incidents-continue-to-increase-in-canada/>; Amy Chung, “In 2021, Asian Canadian Document Hate Crimes to Be Believed,” *Huffington Post*, March 3, 2021, https://www.huffingtonpost.ca/entry/anti-asian-racism-canada_ca_603d08cdc5b682971502118f; Craig Lord, “Hate Crime Reports Up 57% in 2020: Ottawa Police,” *Global News*, <https://globalnews.ca/news/7662271/ottawa-police-hate-crimes-2020/>.

¹⁰¹ Greg Moreau, *Police-reported hate crimes in Canada, 2019* (Statistics Canada, March 29, 2021), <https://www150.statcan.gc.ca/n1/pub/85-002-x/2021001/article/00002-eng.htm>.

communities have been most prominent.¹⁰² For example, between 2012 to 2015, incidents of Islamophobia rose by 253 percent and, more recently, between 2018 to 2019, hate crimes against Muslims increased by 9 percent.¹⁰³ Notably, this data only highlights police-reported incidents and excludes cases not reported to the police, meaning that these numbers are likely even higher. Rates of antisemitism have also increased nation-wide, rising 8 percent between 2018 to 2019, with an average of more than six cases per day. This was particularly felt in Ontario where there was a 62.8 percent rise in antisemitic incidents.¹⁰⁴ The COVID-19 pandemic has sparked increased accounts of anti-Asian racism and Sinophobia. Compared to the 1,946 police-reported hate crimes for all racially-motivated incidents in 2019,¹⁰⁵ between March 2020 and February 2021, anti-Asian incidents alone totaled 1,150 – 40 percent of which occurred in Ontario.¹⁰⁶ Additionally, hate crimes against Black populations are among the highest reported at 18 percent.¹⁰⁷

In 2020 students took to social media to share how racism is experienced and impacts them on their campuses specifically. Instagram accounts like Black at Western, Silenced at Schulich, and Stolen by Smith were created to share stories and illuminate the experiences of racialized and religious students at Ontario universities.¹⁰⁸ Additionally, the documentary *Black in Post-Sec*, discusses students experiences of anti-Black racism and how these incidents occur in different ways such as being disproportionately targeted by campus security, having a lack of representation of Black authors in curricula, and providing inadequate accountability measures following incidents of anti-Black racism.¹⁰⁹

Experiences of racism and religious discrimination can have severe effects on students' social, mental, and emotional wellbeing, including increased feelings of social isolation, anxiety, depression, emotional volatility, and lower self-esteem.¹¹⁰ In addition, students from racialized populations may feel pressure to perform well academically to avoid casting a negative/incompetent image of their racial community.¹¹¹ To alleviate some of the burden that results from internalizing the harms from these incidents, students should feel safe to report acts of discrimination to their post-secondary institutions. However, as illustrated by the Instagram accounts used by students to share their stories, it is clear that students do not feel their institutions offer safe or responsive reporting options. At Wilfrid Laurier University alone, 86 percent of students expressed that they do not report either direct or witnessed experiences of racism to the school and are hesitant about the university's level of concern to address racism on campus.¹¹² Another study focusing on Black Canadians found that majority of the participants did not want to engage in any confrontation following perceived discrimination, and preferred to adopt a passive stance in their reactions to discrimination.¹¹³

In December 2020 the Ontario Human Rights Commission (OHRC) published a letter to post-secondary administrators that revealed the various channels students have accessed to make their experiences known. In the letter, the OHRC made it clear that the lack of institutional response was a significant concern, stating that “[i]t is problematic that students have felt the need to independently seek OHRC

¹⁰² Craig Lord, “Hate Crime Reports Up 57% in 2020”.

¹⁰³ Amy Minsky, “Hate crimes against Muslims in Canada increase 253 percent over four years”, *Global News*, June 13, 2017, <https://globalnews.ca/news/3523535/hate-crimes-canada-muslim/>; Moreau, *Police-reported hate crimes in Canada, 2019*.

¹⁰⁴ Haig, “Anti-Semitic incidents continue to increase in Canada”.

¹⁰⁵ Moreau, *Police-reported hate crimes in Canada, 2019*.

¹⁰⁶ *A Year of Racist Attacks: Anti-Asian Racism Across Canada One Year Into the COVID-19 Pandemic*.

¹⁰⁷ Moreau, *Police-reported hate crimes in Canada, 2019*, 3.

¹⁰⁸ Olivia Bowden, “Canadian University Students Use Instagram to Reveal Racism on Campus,” *CBC News*, September 10, 2020, <https://www.cbc.ca/news/canada/canada-universities-racism-instagram-1.5716603>.

¹⁰⁹ Scott Neigh, “‘Black in Post-Sec’ – struggles and strategies of Black students in Canadian universities,” *Rabble*, January 14, 2020, <https://rabble.ca/podcasts/shows/talking-radical-radio/2020/01/black-post-sec-struggles-and-strategies-black-students>.

¹¹⁰ Dan Cantiller, “How does racism in Canadian post-secondary education impact student success and outcomes?: Summary of a critical annotated bibliography,” *Medium*, June 7, 2020, <https://dancanthinks.medium.com/how-does-racism-in-canadian-post-secondary-education-impact-student-success-and-outcomes-864ac31f2d07>; J. Paul Grayson, “Negative Racial Encounters and Academic Outcomes of International and Domestic Students in Four Canadian Universities.” *Journal of International Students* 4, no. 3 (2014): 262-278, doi: <https://doi.org/10.32674/jis.v4i3.466>.

¹¹¹ Cantiller, “How does racism in Canadian post-secondary education impact student success and outcomes?”.

¹¹² Grant et al., *Being Raced*.

¹¹³ Chigozie Elendu-Okoronkwo, “Race Relations in Sudbury: A Focus on African Canadians,” M.A. thesis (Laurentian University, 2018), 103.

support, when the primary responsibility for addressing human rights issues at their institutions does not rest with them.”¹¹⁴ Therefore, OUSA recommends that the provincial government mandate post-secondary institutions provide trauma-informed and anonymous reporting mechanisms available for all students who experience racial and religious discrimination. One example of this is the online racism reporting tool at the University of Western, introduced in February 2021 as a result of dedicated student advocacy.¹¹⁵ Improving the reporting process not only adds a sense of security for students wanting to disclose an incident and alleviates some of the emotional labour inherent in reporting, but also contributes to the collection of data that can monitor the frequency and prevalence of these events, facilitating policy and program reviews that address anti-racism action on campus.

However, despite students sharing their experiences and raising this concern, there is little research on the pervasiveness of religious discrimination on Ontario campuses, particularly for instances of Islamophobia and antisemitism. One qualitative study with Muslim students found that they faced discrimination from faculty, non-Muslim students, and student services, and that these incidents included stereotyping, derogatory statements, receiving lower grades, poor representation of Islam in curricula, tokenizing, microaggressions, feelings of academic inferiority, lack of support from bystanders, lack of culturally relevant campus support, and discouragement of pursuing advanced degrees.¹¹⁶ Research on the experiences of Jewish students at post-secondary institutions in Ontario is also limited and therefore the issues and impacts related to antisemitism cannot be identified, understood, or responded to meaningfully. It is evident that more research is needed to better understand the wide-reaching effect of these experiences in the context of post-secondary education and on university campuses in particular. To address this research gap, OUSA recommends that the provincial government provide funding for research on religious discrimination and its effects in post-secondary institutions, with a focus on antisemitism and Islamophobia. This research should be used to create best practices to inform institutional responses and policies to address religious discrimination at post-secondary institutions. The results from this research and policy development will be critical in creating a campus climate that is safe for students facing religious discrimination. This research should centre student voices and include student-driven recommendations, including requests for better promotion of identity-based groups/clubs, incorporation of antisemitism in diversity and inclusion trainings, financial aid to support student-led initiatives on campus, and the creation of spaces on campus to encourage student-driven cultural events.

The onset of the COVID-19 pandemic amplified pre-existing anti-Asian rhetoric and Sinophobia. This significantly affected both domestic and international Asian students in different ways. For domestic Asian students who reported experiencing racism, 7 percent of young adults (ages 19-35) were coughed/spat on and 6 percent were physically assaulted – 79 percent of those who experienced the latter reported mental distress and emotional harm arising from the incident.¹¹⁷ International Asian students who opted to learn remotely during the pandemic had limited access to campus mental health supports, which is an added barrier to being a member of a culture that stigmatizes accessing these types of supports.¹¹⁸ Furthermore, increases in Sinophobia made Chinese international students ambivalent about enrolling in Canadian schools – 60 percent indicated that they did not have positive feelings about attending a Canadian institution.¹¹⁹ The “model minority” myth, which portrays Asian Canadians as high-achieving, successful individuals as compared to those from other races, plays a role in downplaying anti-Asian racism as it attempts to highlight ‘positive’ Asian stereotypes to excuse anti-Asian sentiments.¹²⁰ As seen with other types of equity-based data collection, research on the impacts of the model minority myth is scarce and makes it difficult for post-secondary institutions to identify, assess, and improve the conditions for Asian students on campuses, which only perpetuates both overt and covert forms of anti-

¹¹⁴ Chadha, “Letter to Universities and Colleges on Racism and Other Human Rights Concerns”.

¹¹⁵ Pedersen, “Western Introduces New Centralized Racism Reporting Tool”.

¹¹⁶ Alizai, “Impact of Islamophobia on Post-Secondary Muslim Students Attending Ontario Universities”.

¹¹⁷ *A Year of Racist Attacks: Anti-Asian Racism Across Canada One Year Into the COVID-19 Pandemic*.

¹¹⁸ Cedric Jiang, “Tuition Mental Wellness, and Sino-phobia: Chinese International Students Have Unique Concerns Facing Another Semester Online, Survey Shows,” *The Varsity*, September 13, 2020, <https://thevarsity.ca/2020/09/13/tuition-mental-wellness-and-sino-phobia-chinese-international-students-have-unique-concerns-facing-another-semester-online-survey-shows/>.

¹¹⁹ *Ibid.*

¹²⁰ Lee-An and Chen, “The Model Minority Myth Hides the Racist and Sexist Violence Experienced by Asian Women”; Cheung, “How the ‘Model Minority’ Myth Fuels Anti-Asian Racism and White Supremacy”.

Asian racism. This is why OUSA recommends the provincial government task the Higher Education Quality Council of Ontario with conducting research on racism towards the Asian and Pacific Islander communities and its effects in post-secondary institutions. Recognizing both the impact that the model minority myth has in “offsetting” anti-Asian racism and the long-lasting effects of the COVID-19 pandemic, this research will be crucial in understanding how to best pro-actively and effectively support domestic and international Asian students. Like the research conducted on religious discrimination, this research should be used to create best practices to inform institutional responses and policies to address anti-Asian racism on their campuses.

OBSERVATION OF RELIGIOUS AND CULTURAL PRACTICES

Principle: Post-secondary institutions have a duty to accommodate students' religious and cultural beliefs and practices to the point of undue hardship as defined under the *Ontario Human Rights Code*.

Principle: The Ontario Human Rights Commission recommends that organizations, including post-secondary institutions, should seek to adopt the principles of "inclusive design" to proactively remove barriers for people of diverse faiths and cultures, minimizing the need for people to request individual accommodations.

Principle: Students of diverse faiths and cultures should not face barriers to their academic and student life as a result of a lack of institutional support or understanding.

Principle: Students should be supported by faculty, instructors, and staff when accessing accommodations, and students should not face negative academic consequences for the observation of religious and cultural practices.

Principle: The process for seeking and receiving accommodations for the observation of religious and cultural practices should be clear and accessible to students, faculty, and staff.

Principle: Acceptance and promotion of diverse faiths and cultures is beneficial to all students in a post-secondary institution.

Concern: There is a lack of institutional clarity, support, and enforcement of the duty to accommodate which creates inconsistency in access to accommodations for religious and cultural practices and leads to instructors using individual discretion when responding to accommodation requests.

Concern: There is no clear institution-specific guidance on how to apply *Ontario Human Rights Code* policies and principles to institutional policies on accommodations and inclusiveness for religious and cultural practices, resulting in inconsistent, unclear, or insufficient accommodations that may contradict the *Ontario Human Rights Code*.

Concern: Not all students feel comfortable contacting faculty and staff to request accommodations for the observation of religious and cultural practices due to lack of institutional clarity regarding accommodations and fear of instructors being discriminatory or not honouring reasonable requests.

Concern: Some institutional policies or campus/cultural expectations place the onus on students to seek out and request accommodations from each individual instructor for the observation of religious and cultural practices.

Concern: Some instructors and administrators may not be familiar with their legal requirements to accommodate students and may not know what resources are available on their campus to support accommodations.

Concern: Post-secondary institutions may not provide physical spaces for students to observe certain religious and cultural practices.

Concern: Students may feel uncomfortable or targeted on campus due to the observation of religious and cultural practices.

Recommendation: The Ministry for Colleges and Universities should task the Higher Education Quality Council of Ontario to work with the Ontario Human Rights Commission to release a basic framework with general guidelines for implementing institutional accommodation policies and reporting procedures that are student-centred and abide by the *Ontario Human Rights Code*.

Recommendation: The Ministry of Colleges and Universities should require all postsecondary institutions to clearly communicate accommodation policies and reporting procedures to students, faculty, and staff.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario to conduct an audit of current accommodation practices at Ontario universities and how equipped faculty and staff feel to support accommodations according to institutional policies and the *Ontario Human Rights Code*.

Recommendation: The provincial government should provide funding, according to institutional need, for centralized offices with staff equipped with the training and expertise to provide guidance to faculty and administration on accommodation for religious and cultural practices.

Recommendation: The provincial government should provide direction and funding, according to institutional need, for the reasonable allotment of physical spaces on campus to facilitate the observation of certain religious and cultural practices.

The right to practice religious or creed beliefs is protected by both the *Ontario Human Rights Code (Code)* and the *Canadian Charter of Rights and Freedoms*.¹²¹ Post-secondary institutions play a key role in upholding this right, considering that these institutions are often not designed to support the diversity of religious and cultural practices of their students, faculty, or staff. For example, these institutions follow the Gregorian calendar which prioritizes the celebration and observance of Christian holidays. This results in automatic time off for holidays like Christmas and Easter, which not all students commemorate and does not account for the multitude of religious and cultural observances of post-secondary students, faculty, and staff. As stipulated in the *Code*, “[e]ducation providers are responsible for accommodating creed-related needs to the point of undue hardship” under the duty to accommodate.¹²² Undue hardship is determined according to three factors: cost, outside sources of funding, and health and safety requirements.¹²³ According to the Ontario Human Rights Commission (OHRC), organizations who are bound by the *Code*, which includes post-secondary institutions, can meet their duty to accommodate by applying principles of “inclusive design”. Inclusive design is an approach to help proactively identify and remove barriers, avoiding the need for individuals to request these accommodations which can be an uncomfortable and fearful process.¹²⁴

Despite this tenet being embedded in the *Code*, the duty to accommodate is often lost and unclear in post-secondary settings, resulting in inconsistencies in how the duty to accommodate manifests across and within post-secondary institutions. This creates an inequitable learning environment for students of diverse faiths and cultures who may face negative academic consequences or face additional barriers to academic and student life. As a first step, OUSA recommends that the Higher Education Quality Council of Ontario (HEQCO) work with the OHRC to develop a basic framework and general guidelines that will support post-secondary institutions in implementing student-centred accommodation policies and

¹²¹ Ontario Human Rights Commission, *Policy on Preventing Discrimination Based on Creed* (Ontario Human Rights Commission, 2015).

¹²² “Policy Statement on Religious Accommodation in Schools,” *Ontario Human Rights Commission*, accessed April 26, 2021, <http://www.ohrc.on.ca/en/policy-statement-religious-accommodation-schools>.

¹²³ *Ibid*.

¹²⁴ Ontario Human Rights Commission, “Inclusive design and the duty to accommodate,” (fact sheet), accessed April 26, 2021, <http://www.ohrc.on.ca/en/inclusive-design-and-duty-accommodate-fact-sheet>.

procedures that are grounded in the *Code*. This would provide a base level of consistency for students, their instructors, and institutional policy makers. It would also address concerns that students have shared that not all instructors or administrators understand, or are aware of, their duty to accommodate.¹²⁵ As a result, the decision-making process for an accommodation request may not consider the legal underpinnings attached to the decision. It is important for both instructors, and administrators to fill in these knowledge gaps to be fully aware of their duties in granting accommodation requests to make more informed decisions. Miscommunication about policies exacerbates this issue and makes the accommodation process confusing and tiring for students and their instructors. OUSA therefore recommends the Ministry of Colleges and Universities mandate that all post-secondary institutions clearly communicate their respective accommodation policies and reporting procedures to all members of campus including students, faculty, and staff to ensure a consensus of understanding in the adoption and implementation of these policies and thus an increased consistency of practice.

In addition to concerns about lack of consistency and clarity around institutional policies and practices, students are concerned about the impact existing policies have on their access to accommodations. For example, post-secondary institutions often place the burden on students to submit accommodation requests directly to instructors.¹²⁶ Individualizing this process without a clear and accountable framework leads to inconsistent and insufficient results that do not comprehensively address the inequities experienced by students. It gives instructors discretionary powers that can be discriminatorily applied or result in responses that do not address the initial concern. For example, Jewish students shared experiences of requesting weekend exams to be rescheduled, only to have them moved to the following weekend, which does not address the concern that weekend exams infringe on their religious practices. It also places an additional burden of labour on students seeking accommodations as “a lot of work is being done behind the scenes” to build relationships with instructors and educate them on their religious and/or cultural practices.¹²⁷

This lack of institutional clarity creates an additional barrier for students trying to access accommodations on religious and/or cultural grounds. Students making these requests may fear being rejected or may face discrimination; these factors make students uncomfortable with engaging in this process. This issue is heightened since the onus rests with students to ask for accommodations from individual instructors. However, even in cases where inclusive design is practiced, the diversity of needs among students and various religion/creed observances makes it difficult to create universal policies and practices to proactively and inclusively address all students’ needs, which necessitates instances where students may need to request accommodations themselves. In these cases, it is important that students do not face undue burdens and that they are able to easily and indiscriminately access accommodations. To support this, the provincial government should provide funding, according to institutional need, for centralized offices with staff equipped with the training and expertise to provide guidance to faculty and administration on accommodation for religious and cultural practices. An example of this could be the implementation of a chaplaincy office, like “Faith and Spiritual Life” at Queen’s University which operates as part of Student Affairs.¹²⁸ Chaplains can act as cultural and religious brokers who work with students from all faiths and elevate the status of marginalized religions on campus.¹²⁹ At the time of writing, Queen’s University is the only university in Ontario that has this resource. However, in order to support the unique needs of each post-secondary institution, OUSA recommends that funding not be limited to chaplaincy offices, but instead be offered to support any staffed and resourced centralized office intended

¹²⁵ Julia Kaplan, “Religious Accommodation in Post-Secondary Institutions: The Case of Queen’s University,” M.A. research essay, (Queen’s University, 2015), 17.

<https://www.queensu.ca/religion/sites/webpublish.queensu.ca.rlgnewwww/files/files/rels/grad/Julia%20Kaplan%20MRP.pdf>
¹²⁶ For example see: “Accommodations for Religious Observances,” *Wilfrid Laurier University*, accessed April 26, 2021, <https://students.wlu.ca/academics/calendars-and-policies/petitions-and-appeals/accommodations-for-religious-observances.html>;
Policy on Academic Accommodation for Religious, Indigenous and Spiritual Observances, McMaster University, May 13, 2015, <https://secretariat.mcmaster.ca/app/uploads/2019/02/Academic-Accommodation-for-Religious-Indigenous-and-Spiritual-Observances-Policy-on.pdf>; “Religious Accommodation,” *Queen’s University*, accessed April 26, 2021, <https://www.queensu.ca/faith-and-spiritual-life/religious-accommodation/academics>.

¹²⁷ Alizai, “Impact of Islamophobia on Post-Secondary Muslim Students Attending Ontario Universities”.

¹²⁸ “Faith and Spiritual Life,” *Queen’s University*, accessed April 26, 2021, <https://www.queensu.ca/faith-and-spiritual-life/>.

¹²⁹ Brian E. Konkol, “Chaplains Are Essential for Higher Education’s Heart and Soul,” *Inside Higher Ed*, December 15, 2020, <https://www.insidehighered.com/views/2020/12/15/importance-chaplains-and-why-colleges-should-support-them-opinion>.

to help students create a stronger, cross-religious community that can advocate for and ensure accommodations for various religious and cultural observances. This may include the inception of inter-faith groups/councils and equity and inclusion offices who can speak to the varied needs of religious groups and participate in the decision-making processes about accommodation policies that impact students.

The issue of accommodations is compounded by the lack of research on religious and cultural discrimination on campuses as it makes the nuances of this issue difficult to address, despite its importance and the fact that students have raised a number of concerns. Therefore, OUSA believes HEQCO should conduct an audit to better understand accommodation practices at Ontario universities, and assess the comfort level of staff in following these policies in line with their respective institution and the *Code*. This will help determine the steps needed to expand the knowledge base of instructors and administrators and better equip them in granting accommodations that align with both institutional policies and the *Code*. This work should take into consideration the needs of students and can build on consultations already done with students from diverse faiths and cultures. For example, students have shared that there should be more accountability on instructors to consider various religious and cultural events in their calendar planning and have suggested student-centred actions such as removing participation marks, providing accommodations throughout the course (rather than just exam period), and raising more awareness about requesting accommodations. The findings of this audit and these recommendations could be included in the framework and guidelines developed by HEQCO to support post-secondary institutions in implementing student-centred accommodation policies and procedures that are grounded in the *Code*.

Finally, many religious and cultural practices require physical space. University campuses come with various infrastructure to support student activities and daily living, and this should include activities for the observance of religious and cultural beliefs. Students at OUSA-member schools have expressed their concern around a lack of physical space on campuses to practice their religion and/or culture. The creation of this space would give students a place for solace and community building – many students have shared that practicing their religion on campus with other students belonging to the same religion has helped them gain a sense of community, improving their mental health and positively impacting their campus socialization. Having this space is especially important since students can feel targeted and uncomfortable when practicing their religion and/or culture on campus. This has become more salient with rising incidents of Islamophobia and antisemitism both on campus and in the broader societal context.¹³⁰ To support students to feel safe, welcome, and included on their campuses, the provincial government should provide direction and funding, based on institutional need, to allot physical spaces on campus that are dedicated for the observation of religious and cultural practices. This funding should be sufficient to establish multiple spaces that are accessible for students across campus and to account for the needs of different cultural and faith groups.

SPECIAL CONSTABLES AND CAMPUS SECURITY

Principle: All students should feel safe and welcome on campus.

Principle: Communication of funding, governance, and hiring practices of campus security systems should be transparent and easily accessible.

Principle: Students and community members should be active members in shaping campus safety methods, funding, and providing oversight to ensure clear reporting guidelines and accountability measures.

¹³⁰ Alizai, “Impact of Islamophobia on Post-Secondary Muslim Students Attending Ontario Universities”; Ahmar Khan, “Anti-Semitism on the Rise Across Canada, According to New B’nai Brith Statistics,” *CBC News*, April 29, 2019, <https://www.cbc.ca/news/canada/manitoba/jewish-hate-targeting-canada-1.5115890>.

Concern: There have been several recent investigations into special constables and campus security engaging in racial profiling and discriminatory practices.

Concern: Racialized students and students from other marginalized groups report feeling unsafe and threatened around campus security personnel or special constables.

Concern: Special constable systems in Ontario work closely with, and are often governed by, local police, many of which have been investigated for racial profiling and other discriminatory practices.

Concern: There is minimal research to show the effectiveness of campus security and/or special constables on campus.

Concern: The allocation and breakdown of institutional funding to campus security systems may be unclear and inaccessible to students and the public.

Recommendation: The provincial government should task the Higher Education Quality Council of Ontario with conducting research on the effectiveness of police on campus and their effect on racialized students.

Recommendation: The provincial government should mandate that institutions conduct responsible and meaningful consultations with all campus community members – particularly Black, Indigenous, and racialized students – to collect community concerns and create a long-term community-informed plan for campus safety.

Recommendation: The provincial government should mandate that institutions conduct annual reviews of the effectiveness of current campus security practices, policies, systems, and infrastructure with active engagement of Black, Indigenous, and racialized students and communicate findings in a public, accessible manner to students.

Recommendation: The provincial government should mandate that institutions publish current data collection processes regarding campus security/special constable systems to students in a clear and accessible manner.

Recommendation: The provincial government should mandate that institutions provide a clear and accessible breakdown of funding of campus security systems to students and the general public.

Recommendation: The provincial government should mandate that institutions provide mandatory community policing, de-escalation, anti-racism, and Indigenous cultural competency training to all current security officers and/or special constables serving on campuses.

Recommendation: The government should develop a common standard for universities to collect demographic data, including disaggregated race-based data, and mandate that campus security collect and report demographic data on interactions.

Recommendation: The provincial government should amend Part IV, section 28 of the *Comprehensive Ontario Police Services Act, 2019* to specify that, where a municipal police service board appoints special constables to be employed by a post-secondary institution, the municipal diversity plan include diverse student representation from Black, racialized, and/or Indigenous communities.

Recommendation: The provincial government should provide special grant funding for training and staffing of student-led and community-led non-enforcement crisis intervention response teams on campuses.

Recommendation: The provincial government should mandate that post-secondary institutions create a public plan within three years through responsible and meaningful consultation with students to create more compassionate, community-informed, and culturally and racially diverse campus safety models,

including the re-allocation of funding from any existing and future campus security or policing budgets to student-led and community-led non-enforcement crisis intervention services, social services, and mental health supports on campuses.

Recommendation: The provincial government should create a fund for post-secondary institutions to conduct equity audits that will help identify gaps in institutional hiring and prioritize hiring of Black, Indigenous, and racialized campus security.

All students should feel safe and welcome on their campus, yet current campus security systems and the presence of special constables and security personnel at post-secondary institutions have been raised as a significant concern, infringing on the safety and wellbeing of Black, Indigenous, and other racialized students. While this is not a new concern – there is an ongoing history of violence perpetuated by police against Black and Indigenous people in Canada – increased public awareness of instances of racial profiling, discriminatory practices, police brutality, and the murder of Black and Indigenous people by police has brought the issue of special constables and security on university campuses to the forefront.¹³¹

Special constables may be more commonly recognized as “campus police”, a title many held prior to the 2019 passage of Bill 68, *Comprehensive Ontario Police Services Act*. This legislation includes provisions related to special constables, including a prohibition on employers using the term “police” in referring to or describing the role of its special constables.¹³² However, despite the change in title, it is important to recognize that this did not change the duties or powers of special constables who “are granted police authority through provincial legislation” and “perform a near-identical role to that of city police; within the boundaries of the university they respond to emergencies, conduct investigations, and make arrests.”¹³³ However, there are some unique distinctions between special constables who work on university campuses and municipal police. For example, special constables are employed by the university, not a police service, and investigations into misconduct are therefore handled by the university as the employer.¹³⁴ At the same time, special constables are also accountable to their local police services board and the Ministry of Community Safety and Correctional Services, introducing a level of complexity and confusion around accountability frameworks.¹³⁵

The presence and actions of special constables and campus security at Ontario universities have been sources of harm for many Black, Indigenous, and People of Colour. For example, in June 2019, a Black student was followed, handcuffed, and detained without lawful reason;¹³⁶ another Black student “was stopped and asked to provide identification by a security guard when entering his residence building”;¹³⁷ and yet another Black student was arrested and handcuffed after seeking support in the midst of a mental health crisis.¹³⁸ The lack of support or protection for racialized students by these bodies compounds these harms. Students have cited incidents where: death threats and hate crimes are not resolved;¹³⁹ extra security was provided to white supremacist speakers and their supporters on campus, but not for the

¹³¹ Krista Stelkia, “Police Brutality In Canada: A Symptom of Structural Racism and Colonial Violence,” *Yellowhead Institute*, July 15, 2020, <https://yellowheadinstitute.org/2020/07/15/police-brutality-in-canada-a-symptom-of-structural-racism-and-colonial-violence/>; Sherina Harris, “University Students Want to Defund ‘Dangerous’ Campus Police,” *Huffington Post*, November 3, 2020, https://www.huffingtonpost.ca/entry/ontario-universities-defund-campus-police_ca_5fa027a7c5b6b6b60e9242c3.

¹³² *Comprehensive Ontario Police Services Act*, S.O. 2019, c. 1 – Bill 168, s. 100.

¹³³ Lauren Cullen, “The Role of Campus Police,” *Ontario Trial Lawyers Association Blog*, September 8, 2019, <https://otlablog.com/the-role-of-campus-police/>.

¹³⁴ *Comprehensive Ontario Police Services Act*, s. 98(2); Cullen, “The Role of Campus Police”.

¹³⁵ Harris, “University Students Want to Defund ‘Dangerous’ Campus Police”; George S. Rigakos and Samantha Ponting, *Campus Special Constables in Ontario* (Ontario Association of College and University Security Administrators, 2020).

¹³⁶ “Black University of Ottawa Student Arrested by Campus Security; Alleges Racial Profiling,” *CTV News*, June 14, 2019, <https://ottawa.ctvnews.ca/black-university-of-ottawa-student-arrested-by-campus-security-alleges-racial-profiling-1.4467621>.

¹³⁷ Meral Jamal, “UOttawa Student Unions Unite to Address Racism on Campus Following Carding Incidents,” *The Charlatan*, October 28, 2019, <https://charlatan.ca/2019/10/uottawa-student-unions-unite-to-address-racism-on-campus-following-carding-incidents/>.

¹³⁸ Angelina King, “How a Student Seeking Mental-Health Treatment Got Handcuffed by U of T Police,” *CBC News*, November 13, 2019, <https://www.cbc.ca/news/canada/toronto/u-of-t-student-handcuffed-while-seeking-mental-health-treatment-1.5357296>.

¹³⁹ Anam Khan, “Black Students Group Calls to Defund and Abolish U of G Campus Police,” *Guelph Today*, August 19, 2020, <https://www.guelphtoday.com/coronavirus-covid-19-local-news/black-student-group-calls-to-defund-and-abolish-u-of-g-campus-police-2646588>.

Black, Indigenous, and People of Colour protesting these harmful events; and events held by a Muslim Student Association during Ramadan had increased security presence, “having campus police check around the event and remind students to pack it up by a certain time.”¹⁴⁰

Students are additionally concerned about the close relationship between special constables and local police as many of these services have been investigated for racial profiling and other discriminatory practices.¹⁴¹ For example, in 2017 the Ontario Human Rights Commission (OHRC) began an inquiry into racial profiling and racial discrimination of Black persons by the Toronto Police Service. This inquiry has been ongoing and in 2020 the OHRC released its most recent report on data that confirms that Black people are more likely to be arrested, charged and over-charged, and struck, shot, or killed, by the Toronto police.¹⁴² The Hamilton Police Service has faced criticisms for their continued practice of “carding” – a street check where a police officer asks for identifying information – despite more stringent rules for when this practice can be used, including banning the collection of information arbitrarily, based on a person’s race, or based on a person’s presence in a high crime neighbourhood.¹⁴³ Then City Councillor, now Member of Parliament, Matthew Green, “filed a complaint against the city’s police, saying he was arbitrarily stopped by an officer and grilled with questions” and in 2018 the officer was found not guilty raising questions about police oversight and accountability.¹⁴⁴ Black youth in Hamilton have also been vocal about their experiences of harassment and arbitrary street checks by Hamilton police.¹⁴⁵ Not only are students concerned about these experiences in their communities, they are concerned about similar instances happening on their own campus, citing an incident where a former Toronto police officer was racially profiled by McMaster special constables.¹⁴⁶

And while there are a number of examples illustrating how special constables and campus security target, harass, and otherwise harm Black, Indigenous, and People of Colour on post-secondary campuses across the province, there is little evidence that shows the effectiveness of special constables and campus security in their roles in maintaining and supporting campus safety. This, coupled with the lack of clarity and accessibility around institutional funding allocations for these bodies, raises questions as to whether it is appropriate to continue to fund and employ them. To answer these questions, OUSA recommends that the Higher Education Quality Council of Ontario (HEQCO) conduct research on the effectiveness of special constables and security on campus and their effect on racialized and other marginalized students. Additionally, recognizing that each institution has their own campus climate and relationship with special constables and/or campus security, the provincial government should mandate that institutions conduct responsible and meaningful consultations with all campus community members – particularly Black, Indigenous and racialized students – to develop a long-term, community-informed plan for campus safety that addresses student concerns. These recommendations are offered to recognize the importance of giving power and voice to students and local communities in their campus context to better understand and employ a framework for campus safety that works best for them.

Long-term, community-informed plans should consider and prioritize more compassionate, and culturally and racially diverse campus safety models, including the introduction or expansion of student- and community-led non-enforcement crisis intervention response services, social services, and mental

¹⁴⁰ Harris, “University Students Want to Defund ‘Dangerous’ Campus Police”.

¹⁴¹ Rigakos and Ponting, *Campus Special Constables in Ontario*, 16.

¹⁴² Ontario Human Rights Commission, *A Disparate Impact: Second Interim Report on the Inquiry into Racial Profiling and Racial Discrimination of Black Persons by the Toronto Police Service* (Government of Ontario, August 2020).

¹⁴³ Muriel Draaisma, “New Ontario Rule Banning Carding by Police Takes Effect,” *CBC News*, January 1, 2017, <https://www.cbc.ca/news/canada/toronto/carding-ontario-police-government-ban-1.3918134>; “New Changes to Policing,” *Government of Ontario*, updated April 9, 2019, <https://www.ontario.ca/page/street-checks>

¹⁴⁴ Dan Taekema, “Black City Councillor Says Hamilton Police ‘Carded’ Him,” *Toronto Star*, April 27, 2016, <https://www.thestar.com/news/crime/2016/04/27/black-city-councillor-says-hamilton-police-carded-him.html>; Molly Hayes, “Hamilton Police Officer Found Not Guilty in Carding Case Involving Black Politician,” *The Globe and Mail*, April 26, 2018, <https://www.theglobeandmail.com/canada/article-hamilton-police-officer-found-not-guilty-in-carding-case-involving/>.

¹⁴⁵ Kevin Werner, “Hamilton Police Continue to ‘Harass’ Black Youth, Activists Tell Justice Michael Tulloch,” *Hamilton News*, March 20, 2018, <https://www.hamiltonnews.com/news-story/8341359-hamilton-police-continue-to-harass-black-youth-activists-tell-justice-michael-tulloch/>.

¹⁴⁶ Bobby Hristova, “Former Toronto Police Officer Says He Was Racially Profiled by McMaster Security,” *CBC News*, July 10, 2020, <https://www.cbc.ca/news/canada/hamilton/toronto-police-officer-racial-profiling-mcmaster-university-hamilton-1.5643651>.

health supports on campus. The provincial government should mandate that post-secondary institutions, based on the responsible and meaningful consultations conducted, develop and publicize their plan within three years to support the prioritization of this work and to allow for these models to be implemented as soon as possible to limit further harm experienced by Black, Indigenous, and People of Colour on post-secondary campuses. Importantly, allocation of funds will be a critical component for the effectiveness of these models. To this end, the provincial government should ensure that student- and community-led non-enforcement crisis intervention response teams on campuses are adequately funded through special grant funding that can be used for both training and staffing these teams. Additionally, they should mandate that, as part of the campus safety models, post-secondary institutions include a plan for re-allocation of funding from any existing and future campus security or policing budgets towards non-enforcement safety services. The exact amount of re-allocated funding will necessarily be institution specific, but should be decided as part of student consultations and sufficient to support the non-enforcement services and programming that make up the campus safety model.

However, while it is critical that interventions for campus safety do not include bodies, programs, or services that have and continue to harm students in the ways that special constables and campus security have been shown to do, these bodies will continue to operate on post-secondary campuses, at least for the foreseeable future. That is why OUSA recommends a number of accountability measures that are critical to mitigating harm experienced by students, particularly Black and Indigenous students, on their campuses. Importantly, these measures should not increase the budgets or funding allocations for Special Constables or campus security. First, OUSA recommends that the provincial government mandate that post-secondary institutions conduct annual reviews of the effectiveness of current campus security practices, policies, systems and infrastructure, with active engagement of Black, Indigenous and racialized students, and communicate findings in a public, accessible manner to students. Some institutions have already begun this work. For example, Wilfrid Laurier University launched an external review involving community consultations of its multi-campus Special Constable Service to better understand how they “interact with Black, Indigenous, and racialized members of the Laurier community, and how reports of racism are responded to and addressed.”¹⁴⁷

An important tool for accountability is data collection and access to data. To this end, OUSA recommends that the provincial government develop a common standard for universities to collect demographic data, including disaggregated race-based data, and mandate that campus security collect and report demographic data on interactions. This standard could build on the Data Standards for the Identification and Monitoring of Systemic Racism, with more specific guidance in the context of special constables and campus security interactions. A more in-depth discussion of race-based data collection and student concerns and recommendations is offered below in the section on “Equity-Based Data”. Additionally, the provincial government should mandate institutions publish current data collection processes regarding campus security/special constable systems to students in a clear and accessible manner. This could be applied in a similar manner to the requirement for post-secondary institutions to make sexual violence policies and student input processes publicly available under Ontario Regulation 131/16. They should further mandate that post-secondary institutions provide a clear and accessible breakdown of funding of campus security systems to students and the general public. These mandates would introduce a degree of transparency that is necessary for students and their communities to hold post-secondary institutions accountable for their security models and practices.

Beyond the need for accountability measures, there is a clear need to address immediate student concerns about the ways in which special constables and campus security interact with students on their campuses. One measure to mitigate these concerns is a requirement that all post-secondary institutions provide mandatory community policing, de-escalation, anti-racism, and Indigenous cultural competency training to all current security officers and/or Special Constables serving on campuses. At the time of writing, Ontario universities make the following training available, either optional or mandatory, to the Special Constables they employ: community policing; conflict management; diversity training; Liquor Licensing Act; Mental Health Act; Young Offenders Act; crime prevention; drug awareness procedures; sexual

¹⁴⁷ “Review of Special Constable Service commences, reviewers announced,” *Laurier News Hub*, January 25, 2021, <https://www.wlu.ca/news/spotlights/2021/jan/review-of-special-constable-service-commences-reviewers-announced.html>.

assault.¹⁴⁸ However, more comprehensive and robust training is necessary to address foundational and structural concerns. Importantly, training cannot be the only measure introduced to address student concerns. The effectiveness of training will depend, largely, on the willingness of the participants to learn and internalize the material, and is ineffective without complementary systemic change. Therefore, training should be enhanced to mitigate some of the inherent harms in campus security interactions, with the understanding that additional structural changes are being made at the same time.

Finally, students and their communities should have oversight of the hiring and appointment of special constables and campus security personnel, which should also prioritize an equity, diversity, and inclusion lens to diversify these bodies. To this end, the provincial government should amend Part IV, section 28 of the *Comprehensive Ontario Police Services Act, 2019* to specify that, where a municipal police service board appoints special constables to be employed by a post-secondary institution, the municipal diversity plan include diverse student representation from Black, racialized, and/or Indigenous communities. This would align with current requirements under section 28, “Municipal Diversity Plans”, but would recognize the importance of including student voices. It is equally important that students who occupy these roles have access to supports to navigate potential harms that may arise as a result of the inherent racism built into policing that could result in them being taken advantage of, bullied, or otherwise dismissed. Additionally, the provincial government should create a fund for post-secondary institutions to conduct equity audits – discussed in more detail above under, “Diversity & Representation” – that will help identify gaps in institutional hiring and prioritize hiring of Black, Indigenous, and racialized campus security. Students have shared that they may feel more comfortable interacting with special constables or campus security personnel from their communities, and diversifying the make up of these roles is therefore one way to mitigate harm.

INSTITUTIONAL ACCOUNTABILITY

Principle: Post-secondary institutions must create safe and inclusive environments for their students.

Principle: Post-secondary institutions should be held accountable for furthering racial and religious equity on their campuses.

Principle: Post-secondary institutions must be held accountable for responding to acts of racial and religious injustice on their campuses.

Concern: Post-secondary institutions are not doing enough to proactively build racial and religious equity at their institutions.

Concern: The racial and religious equity work that post-secondary institutions do conduct is often poorly resourced, only addresses surface-level concerns, and does not address underlying systemic issues.

Concern: Students feel they have limited options for recourse from a neutral third party when an act of racial or religious injustice occurs.

Recommendation: The provincial government should responsibly and meaningfully consult with Black, Indigenous, racialized, and religious students on what racial and religious equity looks like at their post-secondary institutions to develop equity metrics for the next iteration of Strategic Mandate Agreements.

Recommendation: The provincial government should incentivize post-secondary institutions to invest in racial and religious equity work through a performance metric under the next iteration of Strategic Mandate Agreements.

¹⁴⁸ Rigakos and Ponting, *Campus Special Constables in Ontario*, 18.

Recommendation: The provincial government should commission research that outlines actionable steps to reduce the impact of systemic racism on post-secondary education and dismantle systemic racism in education.

Recommendation: The provincial government should mandate that post-secondary institutions have independent, confidential reporting structures for students, staff, and faculty to raise concerns on equity issues.

The safety and security of racialized and religious students on campuses is of utmost importance, given the prevalent rates of racism and religious discrimination on campuses. For example: about one-third of Arab students have reported experiences of discrimination on campus;¹⁴⁹ 60 percent of international Chinese students are hesitant about attending a Canadian university because of rising Sinophobia;¹⁵⁰ and there is a culture of anti-Black racism across campuses in Ontario.¹⁵¹ At Wilfrid Laurier University and Western University, 70 and 41 percent of students reported having experienced racism and 76 and 31 percent reported witnessing it, respectively.¹⁵² Post-secondary institutions must be held accountable to proactively ensuring a safe campus for their students and staff, while also making sure that complaints of racism and religious discrimination are responded to appropriately. To this end, post-secondary institutions should adopt the principles of equity, diversity, and inclusion (EDI) and intersectionality, and actively incorporate insights and recommendations from Black, Indigenous, and racialized members of their communities. Creating a safe and inclusive working and learning environment also requires educating students, staff, and faculty on racial and religious equity. It is the responsibility of the post-secondary institution to support this work and embed it in all aspects, structures, policies, and practices.

However, universities are failing to provide a safe and inclusive working and learning environment for racialized and religious students, faculty, and staff, in part due to a lack of attention to EDI principles and intersectionality in policy and program development. For example, 44 percent of Canadian universities “sometimes” use an intersectional lens when developing policies and programs, and 13 percent never do.¹⁵³ This failure to use an intersectional lens allows for significant gaps in program and policy development, ultimately creating an inequitable campus environment. The lack of dedication to EDI principles is also demonstrated in the hiring and retention practices of these institutions. For example, Indigenous professors make up 1.4 percent of all university professors despite Indigenous people representing 3.8 percent of the total workforce and 5 percent of undergraduate students; Black professors make up 2 percent of total university instructors despite being 3.1 percent of the overall labour force.¹⁵⁴ Additionally, racialized staff in these positions are typically under-paid and lack tenure when compared to their white counterparts.¹⁵⁵

Post-secondary institutional policies also typically show a lack of deep and critical understanding of systemic issues, and therefore only address surface-level concerns. For example, they often “treat all equity, diversity and inclusion issues as one, and consequently compile all objectives and activities together. This suggests a slogan-like approach to diversity, potentially overlooking the detailed complexities within each term.”¹⁵⁶ This is exemplified in university anti-racism trainings that do not take an intentional, context-specific, and evidence-informed approach. When training is not approached

¹⁴⁹ Aisha Shibli, *Dismantling Systemic Racism in Canadian Post-Secondary Institutions: Arab Students’ Experiences on Campus* (Canadian Arab Institute, February 2019), 2.

¹⁵⁰ Jiang, “Tuition Mental Wellness, and Sino-phobia”.

¹⁵¹ The Fifth Estate, “Black on campus: Students, staff and faculty say universities are failing them,” *Youtube*, February 26, 2021, <https://www.youtube.com/watch?v=y1CQRi76nho>.

¹⁵² Paige Grant et al., *Being Raced: Research Study* (Wilfrid Laurier University, 2019); *President’s Anti-Racism Working Group Final Report* (Western University, May 19, 2020).

¹⁵³ *Equity, Diversity, and Inclusion at Canadian Universities*, 5.

¹⁵⁴ *Underrepresented & Underpaid: Diversity & Equity Among Canada’s Post-Secondary Education Teachers*, 2.

¹⁵⁵ Henry et al., “Race, racialization and Indigeneity in Canadian Universities”.

¹⁵⁶ Merli Tamtik and Melissa Guenter, “Policy Analysis of Equity, Diversity and Inclusion Strategies in Canadian Universities – How Far Have We Come?,” *Canadian Journal of Higher Education* 49, no. 3 (January 2020): 41-56, 46, doi: 10.7202/1066634ar.

meaningfully, it can be ineffective in changing the perspectives of staff who claim to be “colourblind” and do not “see” race –attitudes that can uphold racial prejudices and reinforce systemic racism.¹⁵⁷

Another factor hindering the effectiveness of institutional policies and programs for racial and religious equity is the lack of Black, Indigenous, racialized, and religious representation in decision-making and leadership bodies, and throughout the policy development process. This is evident when looking at the disproportionate demographic composition of senior leadership and decision-maker positions: racialized individuals make up 40 percent of students, 31 percent of doctoral candidates, and 21 percent of full-time faculty, yet only occupy 8 percent of senior leadership positions.¹⁵⁸ Addressing this gap is a national priority: Universities Canada includes a commitment to support “the recruitment and retention of senior university leaders, university Board and Senate members, faculty, staff and students, particularly from under-represented groups” in their “seven Inclusive Excellence Principles to advance equity.”¹⁵⁹

In order to hold post-secondary institutions accountable to addressing these concerns and ensure they are prioritizing the creation of a safe and inclusive campus environment, OUSA recommends that the provincial government responsibly and meaningfully consult with Black, Indigenous, racialized, and religious students to inform the development of equity metrics for the next iteration of Strategic Mandate Agreements (SMAs). Because the effectiveness of equity work requires sufficient resources and funding, the provincial government should incentivize institutional commitment to invest in racial and religious equity work through a performance metric under the next iteration of SMAs. Potential measures under this metric could include information on enrollment demographics, student satisfaction, faculty demographics, and faculty training completion, but ultimately should be determined based on consultation with Black, Indigenous, racialized, and religious students, staff, and faculty. It is important that consultation intentionally include Black, Indigenous, racialized, and religious students, staff, and faculty because institutional strategic plans are typically crafted with input from student associations, community groups, government representatives, and governance committees, but omit contributions from equity-seeking groups.¹⁶⁰

Institutional EDI policies and strategic plans, however, do not address the overarching issue of systemic racism which continues to perpetuate discrimination in educational institutions. As is demonstrated throughout this policy paper, students, staff, and faculty experience racism in all spheres of post-secondary education. While targeted interventions are necessary, without addressing the systemic racism at the foundation of these experiences, these issues will persist. This requires a complete and accurate understanding of how systemic racism is experienced. However, post-secondary institutions often do not collect this information, making it difficult to assess how far-reaching this issue is.¹⁶¹ Therefore, OUSA recommends the provincial government commission research to inform actionable steps that will work towards reducing the impact of systemic racism on university campuses and deconstruct educational systemic racism. This could mirror the research done to better understand the extent of sexual violence on post-secondary campuses through the 2018 *Student Voices on Sexual Violence Survey*. Importantly, research design should be developed with racialized students and should adhere to strict ethical guidelines to encourage participation and protect the safety of respondents.

It is equally important that students have access to a neutral third party to hold their institution accountable when it perpetuates inequities or when it fails to appropriately and meaningfully respond to experiences of inequity. Students should have a barrier-free process to reporting and/or making a complaint, yet they feel there are limited options available to them. At the time of writing 35 of 49 Canadian universities have designated offices that address incidents of harassment and inequity for staff, however students are reliant on ombuds offices – which do not exist for all post-secondary institutions – or institution-based options such as student services or administrators. When students are limited to institutional complaint pathways, bias and institutional self-interest can cloud the judgment of mediating

¹⁵⁷ Audrey Yap, “Dear universities, your anti-racism workshops aren’t nearly enough,” *TheTyee*, July 13, 2020, <https://thetyee.ca/Opinion/2020/07/13/Dear-Universities-Anti-Racism-Workshops/>.

¹⁵⁸ *Equity, Diversity, and Inclusion at Canadian Universities*, 10.

¹⁵⁹ *Ibid.*, 47, 4.

¹⁶⁰ Tamtik and Guenter, “Policy Analysis of Equity, Diversity and Inclusion Strategies in Canadian Universities”, 47.

¹⁶¹ Shibli, *Dismantling Systemic Racism in Canadian Post-Secondary Institutions*.

bodies who often prioritize institutional reputation and avoiding risk. In a report from Wilfrid Laurier University, 86 percent of the sampled students stated that they do not report their experiences of racism and are ambivalent about the university's genuine concern to address racism on campus.¹⁶² A 2021 investigative report from the Fifth Estate revealed the extent of institutional bias and self-interest through the stories of Black students, faculty, and staff who have been advocating to hold their institutions accountable for their experiences of institution-perpetuated racism. This report also highlighted the fact that students feel unsafe reporting under current structures, and that they view them as primarily ineffective.¹⁶³ Students and staff should have access to a process to respond to discrimination and inequity. To address this concern, the provincial government should require post-secondary institutions to have an independent, confidential reporting system that students, staff, and faculty can use to report equity issues. Importantly, the development of this system must be done in consultation with Black, Indigenous, and racialized students and staff to ensure it is a safe process that they will utilize.

FUNDING FOR INSTITUTIONAL EQUITY WORK

Principle: Post-secondary institutions have a key role to play in attaining and maintaining racial and religious equity in the post-secondary education sector.

Concern: Post-secondary institutions are not adequately prioritizing conducting and funding equity work on their campuses.

Concern: Post-secondary institutions rely on the unpaid labour of racialized students and faculty to conduct equity work.

Recommendation: The provincial government should develop consistent and recurring grants for equity workers, offices, programs, and services at post-secondary institutions.

Students believe that their institutions have an important role in attaining and maintaining racial and religious equity within post-secondary education. Racialized students and faculty have identified many barriers to achieving racial equity and highlighted the lack of institutional supports available to addressing racism and religious discrimination on campus. Events, conferences, and initiatives have been organized to bring awareness to these issues, but there has been little transformative action within post-secondary institutions over the last 10 years.¹⁶⁴ Over this period racialized students, faculty, staff, and community members have been burdened with the education, facilitation, and organization of important anti-racist initiatives with little support from institutions.¹⁶⁵ This work requires significant emotional labour, and many do it without pay in addition to their already full workloads. It also carries significant risk – students have received personal threats and hate messages, and faculty and staff have lost their jobs.¹⁶⁶ There needs to be stronger institutional commitment to challenging racism and religious discrimination that requires institutional resources and consistent funding from the provincial government.

It has been shown “that universities that have established Diversity and/or Equity Offices are more likely to collect important information, monitor EDI [equity, diversity, and inclusion] activities, and make recommendations to senior leadership to make improvements when compared with universities that don't have those dedicated offices.”¹⁶⁷ Section 4.1.2 under “Commitments to Action” in the *Draft Scarborough National Charter on Anti-Black Racism and Black Inclusion in Canadian Higher Education* calls for post-secondary institutions to create offices within senior leadership dedicated to addressing racism

¹⁶² Grant et al., *Being Raced*.

¹⁶³ The Fifth Estate, “Black on campus”.

¹⁶⁴ Natalie Delia Deckard, Ayesha Mian Akram, and Jane Ku, “Canadian universities: 10 years of anti-racist reports but little action,” *The Conversation*, February 23, 2021, <https://theconversation.com/canadian-universities-10-years-of-anti-racist-reports-but-little-action-153033>.

¹⁶⁵ Ibid.

¹⁶⁶ Ibid; The Fifth Estate, “Black on campus”.

¹⁶⁷ Tamtik and Guenter, “Policy Analysis of Equity, Diversity and Inclusion Strategies in Canadian Universities”.

across their campus.¹⁶⁸ It also specifies that these offices should be well-resourced and staffed and should be reporting to the institution as a level of accountability.

Whether it be equity-focused changes to university governance, the creation of equity offices, or improvements to programs and services, these solutions require funding. The Government of Canada, through Equity, Diversity and Inclusion Institutional Capacity-Build grants, has shown that governments can play an important role in encouraging EDI within institutions.¹⁶⁹ Although these grants are administered through tri-council agencies and began as a pilot project, it serves as an example that there is demand from institutions for this type of equity-focused funding. The provincial government has the opportunity to follow suit and show their commitment to racial and religious equity by developing consistent and recurring grants for equity workers, offices, programs, and services at post-secondary institutions.

EQUITY-BASED DATA

Principle: Ethical and equity-based data collection and research is needed to better understand and address racial and religious equity in post-secondary education.

Principle: The collection of equity-based data should be done in a purposeful and responsible manner.

Concern: Many post-secondary institutions and processes in post-secondary education do not collect equity-based data.

Concern: There is no standard for equity-based data collection in post-secondary education.

Concern: There is a lack of research on the scope and impact of racial and religious trauma in Ontario post-secondary education.

Concern: The Data Standards for the Identification and Monitoring of Systemic Racism do not require data collection at regular intervals.

Recommendation: The provincial government should commission research, and responsibly and meaningfully consult with Black, Indigenous, and racialized students, to ensure that the Data Standards for the Identification and Monitoring of Systemic Racism can be appropriately applied to the post-secondary education sector.

Recommendation: The provincial government should mandate the collection of equity-based data, using the Data Standards for the Identification and Monitoring of Systemic Racism, at all stages of post-secondary education processes.

Recommendation: The provincial government should mandate the collection of equity-based data in the post-secondary education sector such that an all-encompassing set of data is collected at least every three years.

The collection of equity-based data needs to be conducted to accurately address equity issues on campuses. While racialized students are aware and knowledgeable about the existence and prevalence of inequities, having available and relevant data can help institutions better understand the complexity and widespread nature of these issues which can ultimately inform more effective interventions. The collection

¹⁶⁸ Adelle Blackett, Ananya Mukherjee, Marie-Clause Rigaud, and Barrington Walker, *Draft Scarborough National Charter on Anti-Black Racism and Black Inclusion in Canadian Higher Education: Principles, Actions, and Accountabilities* (Toronto, ON: University of Toronto Scarborough, February 19, 2021).

¹⁶⁹ "Government of Canada invests to increase equity, diversity and inclusion in research," *Government of Canada*, March 12, 2021, <https://www.canada.ca/en/innovation-science-economic-development/news/2021/03/government-of-canada-invests-to-increase-equity-diversity-and-inclusion-in-researcho.html>.

of equity-based data has been shown to be effective in program evaluation – for example, disaggregated race-based data contributed to the finding that police carding in downtown Toronto affected Black people 17 times more than white people, which led to the termination of the practice in 2017.¹⁷⁰ There is an increasing recognition of the importance of equity-based data collection, particularly as it pertains to race. Statistics Canada recently started collecting race-based data on labour market experiences of Black Canadians,¹⁷¹ Ontario police are now required to collect and report on race-based data when force is used,¹⁷² and by 2023 all Ontario school boards will be required to collect race-based data.¹⁷³

However, there continues to be a significant gap in equity-based data collection across the country. In its 2017 report, the United Nations Committee on the Elimination of Racial Discrimination flagged the lack of Canadian disaggregated data as a concern, citing that this missing information makes it difficult to assess if marginalized groups are enjoying “civil, political, economic, social and cultural rights”, and recommending that different ministries and departments begin collecting this data to better understand the implications of policies that contribute to racial discrimination and inequality.¹⁷⁴ This gap is particularly noticeable in the post-secondary sector. Neither Statistics Canada, nor provincial or federal governments currently collect this data or even conduct research on the experiences of marginalized groups on campuses.¹⁷⁵ The majority of Canadian post-secondary schools do not collect equity-based data either. As of 2017, 63 out of 76 Canadian universities could not provide data about racial demographics of their students.¹⁷⁶ Ontario’s 3-Year Anti-Racism Strategic Plan commits to collecting disaggregated race-based data in an effort to dismantle systemic racism yet there is no context or guidance included for the post-secondary context.¹⁷⁷

Universities need this data to better understand the scope of racism and religious discrimination on campus and how this impacts students’ experiences. According to the Ontario Human Rights Commission (OHRC), numerical and statistical data can provide evidence of how racialized populations are disproportionately represented, which can be an indicator of systemic racism.¹⁷⁸ For example, race-based data collected in the U.S. on students in STEM fields indicates that 3.5 percent of doctoral recipients were Black women while 28.5 percent were white women, indicating the prevalence of systemic racial barriers that discourage Black women from entering STEM.¹⁷⁹ This type of information does not exist in Canada and, as a result, these barriers cannot be identified and deconstructed to expand educational pathways for Black, Indigenous, and racialized students.

A lack of equity-based data also leaves institutions with little resources on how to intervene and improve the quality of campus life for racialized students. For example, gaps in available data can contribute to a lack of understanding or awareness of student experiences with various student support services. It also makes it difficult to know the composition of staff who are providing support services to students and therefore ensure that there is diverse representation among staff – a key factor in supporting the comfort of students accessing these services (see “Student Supports,” above). Ultimately, gaps in equity-based data undermines post-secondary institutions’ ability to effectively identify, validate, and address concerns that racialized and religious students face in their interactions with campus services. Additionally, equity-based data is an important resource to evaluate the effectiveness of programs, services, policies, and other

¹⁷⁰ Janoah Willsie, “When It’s Measured, it Matters: Disaggregated Race Data in Canada,” *McGill University, Max Bell School of Public Policy*, June 17, 2020, <https://policymagazine.ca/when-its-measured-it-matters-disaggregated-race-data-in-canada/>.

¹⁷¹ Statistics Canada, “Study: A Labour Market Snapshot of Black Canadians During the Pandemic,” *The Daily*, February 24, 2021, <https://www150.statcan.gc.ca/n1/daily-quotidien/210224/dq210224b-eng.htm>.

¹⁷² Inayat Singh, Kimberly Ivany and Sylvène Gilchrist, “Why Race-based Data Collection by Police Could Play a Role in Reform Debate,” *CBC News*, July 7, 2020, <https://www.cbc.ca/news/canada/race-police-data-ontario-1.5636301>.

¹⁷³ Sherina Harris, “Black Students Still Face ‘Toxic’ Racism Despite Decades of ‘Solutions’ in Ontario,” *Huffington Post*, June 22, 2020, https://www.huffingtonpost.ca/entry/ontario-schools-racism_ca_5ef0cad1c5b685770a16b072.

¹⁷⁴ United Nations, Committee on the Elimination of Racial Discrimination, *Concluding observations on the combined twenty-first to twenty-third periodic reports of Canada* (Geneva: United Nations, September 13, 2017).

¹⁷⁵ Shibli, *Dismantling Systemic Racism in Canadian Post-Secondary Institutions*.

¹⁷⁶ Jeremy McDonald and Lori Ward, “Why so many Canadian universities know so little about their own racial diversity,” *CBC Investigates*, March 21, 2017, <https://www.cbc.ca/news/canada/race-canadian-universities-1.4030537>.

¹⁷⁷ *A Better Way Forward: Ontario’s 3-Year Anti-Racism Strategic Plan*.

¹⁷⁸ Ontario Human Rights Commission, *Policy and guidelines on racism and racial discrimination*.

¹⁷⁹ Evelyn Asiedu, “Canadian universities must collect race-based data,” *Maclean’s*, July 29, 2020, <https://www.macleans.ca/opinion/canadian-universities-must-collect-race-based-data/>.

interventions to support the experiences of students at their post-secondary institutions.

In response to student advocacy and increasing recognition of the importance of this data across sectors, some post-secondary institutions have begun to collect this data. For example, Wilfrid Laurier University initiated this kind of data collection through its *Count Me In!* project.¹⁸⁰ However, many post-secondary institutions remain hesitant to collect this data due to the heightened ethical considerations required and a lack of guidance or standards for the post-secondary context – institutions and other organizations may fear that they will violate the *Ontario Human Rights Code* by collecting “human rights-based data on Code-grounds such as race, creed, disability, sex or gender identity”, but the Ontario Human Rights Commission (OHRC) strongly encourages engaging in this work if it is done properly and ethically.¹⁸¹ This gap in data collection standards is therefore a concern, not only because it can be deterrent to the collection of equity-based data and will result in inconsistent collection and analysis across institutions, but also because it does not protect against unethical or (unintentionally) harmful data collection practices.

Ontario’s Anti-Racism Directorate has established data standards for race-based data collection in organizations, published as the *Data Standards for the Identification and Monitoring of Systemic Racism (Data Standards)*.¹⁸² The *Data Standards* are useful tool for several reasons: (1) they lay out provisions for obtaining and withdrawing consent; (2) they cover a number of areas that are pertinent in understanding systemic racism such as race, ethnic origin, religion, socio-economic information, and more; and (3) they outline measures of accountability in the analysis and dissemination of the data.¹⁸³ However, the *Data Standards* also have recognized gaps, specifically that they do not require data collection at regular intervals and that they do not include contextual guidance for the post-secondary context. Despite these gaps, OUSA believes that the *Data Standards* can be an effective tool to support ethical, safe, and meaningful equity-based data collection at post-secondary institutions so long as gaps are addressed. Therefore, OUSA recommends that the provincial government commission research and responsibly and meaningfully consult with Black, Indigenous, and racialized students to ensure that the *Data Standards* can be appropriately applied to the post-secondary sector, including guidance for collecting data on access to health services, academic advising, and accessibility accommodations, as well as broader factors such as enrollment and employment.

However, unless the collection of equity-based data is mandatory, it will continue to be up to the discretion of individual institutions to decide whether they will collect this data or not. Under the *Anti-Racism Act*, public sector organizations are not required to collect data consistent with the standards set out in the *Act*, and doing this work is up to the discretion of individual organizations.¹⁸⁴ This means that there is nothing requiring universities to undertake this work, even if there are resources available. Therefore, OUSA recommends that the provincial government mandate the collection of equity-based data according to the *Data Standards* at all stages of the post-secondary education process. Specifically, data collection in post-secondary education should be mandated under Ontario Regulation 267/18, in the *Anti-Racism Act*. This would align with the OHRC’s statement that equity-based data collection is necessary for post-secondary institutions to honour their commitments to engage in equity, diversity, and inclusion work.¹⁸⁵

The requirement to collect this data should be accompanied by a mandate that the collection of equity-based data in the post-secondary education sector be done at least every three years. This will address the gap in the *Data Standards* around data collection at regular intervals and allow post-secondary

¹⁸⁰ “Count Me In! Learn about Laurier’s Student Self-ID Form,” *Laurier*, February 18, 2021, <https://www.wlu.ca/about/discover-laurier/equity-diversity-and-inclusion/news/2021/count-me-in-lauriers-student-self-id-form.html>.

¹⁸¹ Renu Mandhane, “E(RACE)r Summit on Race and Racism on Canadian University Campuses,” *Ontario Human Rights Commission*, March 21, 2016, <http://www.ohrc.on.ca/en/eracer-summit-race-and-racism-canadian-university-campuses>.

¹⁸² Government of Ontario, *Data Standards for the Identification and Monitoring of Systemic Racism*.

¹⁸³ *Ibid.*

¹⁸⁴ Renu Mandhane, “Re: Requiring public sector organizations to collect race-based data,” *Ontario Human Rights Commission*, September 20, 2017, <http://www.ohrc.on.ca/en/re-requiring-public-sector-organizations-collect-race-based-data>.

¹⁸⁵ Ontario Human Rights Commission, *Policy and guidelines on racism and racial discrimination*; Carl James, Karen Robson, and Kelly Gallagher-Mackay, “Universities have a serious data gap on race,” *University Affairs*, May 19, 2017, <https://www.universityaffairs.ca/opinion/in-my-opinion/universities-serious-data-gap-race/>.

institutions to regularly identify and monitor systemic racism on campuses, as well as better understand the experiences and needs of students as political, cultural, and social climates change, so do the experiences and needs of students.

STUDENTS IN THEIR COMMUNITIES

Principle: Students should feel safe and welcomed in the community surrounding their post-secondary institution.

Principle: Students should not face racism or religious discrimination based on their racial and/or religious identity.

Principle: Every community member plays a role in creating a safe and inclusive community.

Principle: Crisis response services play a key role in creating and maintaining a safe community for all.

Concern: Students may experience covert and overt racism or religious discrimination in their community as a result of their racial and/or religious identity.

Concern: Students moving to a new area for university may experience a shift in culture and may lack knowledge of community resources.

Concern: The provincial government is not adequately prioritizing work to reduce the effects of overt, covert, and systemic racism in Ontario.

Concern: Failure to actively prioritize anti-racism work creates a harmful community environment which can be especially detrimental to the wellbeing of young people.

Concern: Existing crisis response services in the communities surrounding post-secondary institutions may be ineffective as a result of gaps in law enforcement training and lack of comprehensive community-based crisis response services.

Concern: Racialized students and students from other marginalized groups report feeling unsafe and threatened around police and other law enforcement personnel.

Concern: Many local police services, in the communities surrounding post-secondary institutions, have been investigated for racial profiling and other discriminatory practices.

Recommendation: The provincial government should increase funding allocated for Anti-Racism Initiatives under the Anti-Racism Directorate with a dedicated stream of funding for initiatives that benefit post-secondary students and other youth.

Recommendation: The provincial government should responsibly and meaningfully consult with Black, Indigenous, and racialized students to ensure Canada's Anti-Racism Strategy meets the needs of students in Ontario then work with the federal government on implementation of the strategy.

Recommendation: The provincial government should responsibly and meaningfully consult with racialized youth, including post-secondary students, to amend Ontario's 3-Year Anti-Racism Strategic Plan following a review to update the timeline, targets, and indicators to support the work of Canada's Anti-Racism Strategy, with an emphasis on youth-focused initiatives.

Recommendation: The provincial government should amend the *Anti-Racism Act, 2017*, s.4 to mandate responsible and meaningful consultation with racialized students most adversely impacted by racism.

Recommendation: Ontario’s 3-Year Anti-Racism Strategic Plan should include a target under “Education sector indicators” for the percent and number of post-secondary institutions collecting race-based data.

Recommendation: Ontario’s 3-Year Anti-Racism Strategic Plan should include a target under “Education sector indicators” for the enrollment of Black, Indigenous, and racialized students in post-secondary education compared to demographics of the general population, percent and number of post-secondary institutions collecting race-based data, and response rates in the collection of personal information by post-secondary institutions.

Recommendation: The provincial government should responsibly and meaningfully consult widely, including with post-secondary students, on prospective Anti-Racism Initiatives and projects for the Anti-Racism Directorate to undertake.

Recommendation: The provincial government should work with regions and municipalities to ensure that there is accessible, comprehensive, no-cost access to mobile crisis intervention services for every member of the community, including post-secondary campuses, which do not call or involve the police.

Recommendation: The provincial government should task the Ontario Human Rights Commission to develop, in consultation with experts, a formalized definition of anti-Asian racism.

Students are important members of their communities, and as such should feel safe, welcome, and not face discrimination based on their racial and/or religious identity. However, like their neighbours, students experience covert and overt racism and religious discrimination due to pervasive and systemic discrimination embedded in our society.¹⁸⁶ For students, these experiences may be compounded if they are living in a new community and lack an understanding of the culture and community resources available to them.

The provincial government has recognized that “systemic racism is deeply entrenched in our day-to-day lives” and that they have “a leading role to play in eliminating systemic racism.”¹⁸⁷ In this role, it is important that the provincial government recognize what they must do, and the role of every community member, to ensure communities are safe and inclusive of all people, regardless of race or religious identity. However, despite this recognition, the provincial government is not adequately prioritizing work to reduce the effects of overt, covert, and systemic racism in Ontario. Under section 2 of the *Anti-Racism Act, 2017*, the provincial government is required to “maintain an anti-racism strategy that aims to eliminate systemic racism and advance racial equity.” However, since the release of the first anti-racism strategy in 2017, little has been done to support Black, Indigenous, and People of Colour-led initiatives or projects.¹⁸⁸ In 2019-2020, the provincial government cut what was already insufficient funding for the Anti-Racism Directorate by \$200,000, and questions were raised about a budgetary line that suggested only \$1,000 would be earmarked for anti-racism initiatives.¹⁸⁹

This failure to actively prioritize anti-racism work creates a harmful community environment which can be especially detrimental to the wellbeing of young people. Racism is a significant factor in inequitable health outcomes, impacting educational, income, and employment attainment that can hinder the success of racialized students who are navigating an already difficult and stressful transitional period in their lives.¹⁹⁰ Young people “are especially vulnerable to discrimination because their developmental growth

¹⁸⁶ Ontario Human Rights Commission, *Policy and guidelines on racism and racial discrimination*, 4.

¹⁸⁷ *A Better Way Forward: Ontario’s 3-Year Anti-Racism Strategic Plan*, 51.

¹⁸⁸ Ministry of the Solicitor General, *Annual Progress Report 2020: Ontario’s Anti-Racism Strategic Plan* (Government of Ontario, 2020).

¹⁸⁹ Travis Dhanraj and Nick Westoll, “Government Document Shows \$1K Earmarked for Anti-Racism Initiatives,” *Global News*, May 14, 2019, <https://globalnews.ca/news/5275383/anti-racism-initiatives-ontario/>.

¹⁹⁰ Public Health Agency of Canada, *Social Determinants and Inequities in Health for Black Canadians: A Snapshot* (Government of Canada, 2020); Neale McDevitt, “Systemic Racism Impacting the Health of Canada’s Black Population,” *McGill Reporter*, February 2, 2021, <https://reporter.mcgill.ca/systemic-racism-impacting-the-health-of-canadas-black-population/>.

depends on social interaction and support” and experiences of racism and discrimination are considered “Expanded ACEs [adverse childhood experiences]” – experiences associated with poor health outcomes in adulthood.¹⁹¹ Young people and students have unique experiences with racism and discrimination that must be accounted for in anti-racism work.

In 2020, Ontario’s Solicitor General and Minister Responsible for Anti-Racism said: “Racism and hate will not be tolerated and our government is doing everything it can to protect people from being victimized because of their race or religious beliefs.”¹⁹² This was accompanied by the creation of “a new Anti-Racism and Anti-Hate Grant program [with funding to] support community-based anti-racism initiatives focusing on anti-Black racism, anti-Indigenous racism, anti-Semitism and Islamophobia.”¹⁹³ This announcement suggests that the provincial government is ready to prioritize anti-racism work. However, one grant program will not address the complexity and deeply entrenched nature of systemic racism in Ontario. As part of this work, students have developed a number of recommendations that will contribute to safer, more positive experiences for racialized and religious students in their communities.

First, it is essential that racialized and religious students who are most adversely impacted by racism and religious discrimination are given a voice in the development of interventions to address these issues. To this end, provincial government should amend the *Anti-Racism Act, 2017*, s.4 to mandate responsible and meaningful consultation with racialized students most adversely impacted by racism. This should be used as the standard for consistent, ongoing, and comprehensive consultations with students on anti-racism strategy development and implementation to ensure these interventions and frameworks meet student needs. OUSA specifically recommends that the provincial government engage in these consultations to better understand gaps in Canada’s Anti-Racism Strategy, how it can be improved to include youth focused-programs, and how it can be best implemented at the provincial level. Based on the work done to improve the effectiveness of the federal anti-racism strategy, the provincial government should continue consultations to inform amendments to Ontario’s Anti-Racism Strategy following a review to update the timeline, targets, and indicators to support the work of Canada’s Anti-Racism Strategy, with an emphasis on youth-focused initiatives. Additionally, Ontario’s Anti-Racism Strategy should be amended to include targets under “Education sector indicators” for: the percent and number of post-secondary institutions collecting race-based data; the enrollment of Black, Indigenous and racialized students in post-secondary education compared to demographics of the general population; and response rates in the collection of personal information by post-secondary institutions. These targets are important additions in order to better understand outcomes and identify challenges faced by students in particular.

A clear strategy and comprehensive targets and metrics must include formal definitions that clarify what is being addressed. Ontario’s *Data Standards for the Identification and Monitoring of Systemic Racism* are accompanied by a comprehensive glossary, but students are concerned about gaps in these definitions, specifically the lack of a formalized definition for anti-Asian racism. This is a concern because this exclusion could result in the exclusion of anti-Asian racism as something to be addressed in provincial strategies, despite rising instances of anti-Asian racism across the country. To address this gap, the provincial government should task the Ontario Human Rights Commission to develop, in consultation with experts, a formalized definition of anti-Asian racism.

Students also have important and necessary perspectives that should be included in decision-making and project development undertaken by Ontario’s Anti-Racism Directorate. Therefore, OUSA recommends that the provincial government include racialized post-secondary students in the development of prospective anti-racism initiatives and projects. These initiatives and projects should have adequate funding that reflects their importance and is able to support a variety of interventions to benefit all community members, including students. To that end, the provincial government should increase funding allocated for Anti-Racism Initiatives under the Anti-Racism Directorate with a dedicated stream of

¹⁹¹ Maria Veronic-Svetaz et al., “The Traumatic Impact of Racism and Discrimination on Young People and How to Talk About It,” in *Reaching Teens: Strength-Based, Trauma-Sensitive Resilience-Building Communication Strategies Rooted in Positive Youth Development*, 2nd ed., ed. Kenneth R. Ginsburg (American Academy of Pediatrics, 2020).

¹⁹² Ontario Government, “Ontario Helping to Protect Communities Against Racism and Hate,” *Newsroom*, July 28, 2020, <https://news.ontario.ca/en/release/57771/ontario-helping-to-protect-communities-against-racism-and-hate>.

¹⁹³ *Ibid.*

funding for initiatives that benefit post-secondary students and other youth. This funding should support student-informed and Black, Indigenous, and People of Colour-led initiatives and projects that would address the impact of systemic racism on youth. For example, initiatives or projects could focus on increasing access to education and funding social services to address socioeconomic inequities such as health and educational outcomes. It should also support public education and awareness campaigns to challenge the “cultural and ideological expressions that underlie and sustain dominant values and beliefs...[and the] concepts, ideas, images and institutions”¹⁹⁴ that perpetuate systemic racism in our society.

Finally, it is important that efforts to support the safety and wellbeing of racialized students in their communities recognize that police and other law enforcement personnel have an ongoing history of violence against racialized persons, particularly against Black and Indigenous people.¹⁹⁵ In an earlier section on “Special Constables & Campus Security” examples of racial profiling and other discriminatory practices by police in Ontario are provided that illustrate some of the ways in which police infringe on the safety and wellbeing of racialized people in their communities. These harms are magnified when police are responding to a crisis, situations which have resulted in the death or killing of Black and Indigenous persons who were reaching out for help.¹⁹⁶ Students are concerned about police response in crisis situations that involve racialized persons but recognize the need for crisis response in order to support the safety of all community members, especially those experiencing the crisis. Therefore, OUSA recommends that the provincial government work with regions and municipalities to ensure that there is accessible, comprehensive, no-cost access to mobile crisis intervention services to every member of the community, including post-secondary campuses, which do not call or involve the police.

HOUSING

Principle: Students should not face racism or religious discrimination based on their racial and/or religious identity.

Principle: Students should not face racism or religious discrimination when seeking and living in rental accommodations.

Concern: Students may experience covert and overt racism or religious discrimination when seeking housing as a result of their racial and/or religious identity.

Concern: Students report experiencing racism or religious discrimination when searching for housing and feel they have limited options for recourse.

Concern: Students, including international students, may not access human rights resources if they are unavailable in their preferred language.

Recommendation: The provincial government should communicate human rights protections in housing under O. Reg. 290/98 and the *Ontario Human Rights Code*, and remedies available to prospective tenants through “Renting in Ontario,” or similar resources.

Recommendation: The provincial government should communicate human rights protections in housing under O. Reg. 290/98 and the *Ontario Human Rights Code*, and remedies available to prospective tenants through promotional materials posted at post-secondary institutions and other public

¹⁹⁴ Ontario Human Rights Commission, *Policy and guidelines on racism and racial discrimination*, 12-13.

¹⁹⁵ Stelkia, “Police Brutality In Canada: A Symptom of Structural Racism and Colonial Violence”; Harris, “University Students Want to Defund ‘Dangerous’ Campus Police”.

¹⁹⁶ “Regis Korchinski-Paquet’s Family Files Complaint with Police Oversight Body, Claims Misconduct, Negligence,” *CBC News*, December 10, 2020, <https://www.cbc.ca/news/canada/toronto/korchinski-paquet-oiprd-complaint-1.5836060>; Dirk Meissner, “Chantel Moore’s Mother Says She Wants Justice After Fatal Police Shooting,” *CBC*, June 18, 2020, <https://www.cbc.ca/news/canada/british-columbia/chantel-moore-s-mother-says-she-wants-justice-after-fatal-police-shooting-1.5618551>.

places.

Recommendation: The provincial government should widely advertise information available through Steps to Justice and the Human Rights Legal Support Centre in student-focused resources.

Recommendation: The provincial government should expand resources available through Steps to Justice and the Human Rights Legal Support Centre to support international students and other non-official language speaking students.

One area where students encounter racism and religious discrimination in their communities is with housing, specifically rental housing. While there are other housing situations where a student may face racism and religious discrimination, the focus of this section is on discrimination in rental housing as a significant majority of students are renters and this is an area of concern that students at OUSA member schools have. However, OUSA believes that, no matter what type of housing situation a student has, they should not face racism or religious discrimination.

Students have shared their experiences of racism and religious discrimination while they are seeking or living in rental accommodations. For example, students have been told a unit is unavailable after the landlord learned they were Black, but when they inquired through a different channel, under a different name, or had a white friend inquire, they were told the unit was still available.¹⁹⁷ Students have also shared experiences where potential landlords asked questions about their racial identity, implying that they would be making a decision based on this information.¹⁹⁸ These experiences are common for many racialized and religious students, and can be exacerbated for international students who may have language barriers, limited understanding of the Ontario rental market, and fewer support networks.

The *Ontario Human Rights Code (Code)* provides protections against discrimination in rental housing on a number of grounds, including: race, colour, ancestry, creed (religion), place of origin, ethnic origin, and citizenship.¹⁹⁹ This is reiterated in section 4 of *Ontario Regulation 290/98: Business Practices Permissible to Landlords in Selecting Prospective Tenants for Residential Accommodation* which specifies: “Nothing in this Regulation authorizes a landlord to refuse accommodation to any person because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status, disability or the receipt of public assistance.” Despite these protections, students feel there are limited options for recourse when they encounter racism or religious discrimination when seeking or living in rental accommodations. Even if students are aware that *Code* protections exist, they may be unaware of the process for accessing remedies, or even what remedies might look like. Therefore, the provincial government should make efforts to better communicate available protections and remedies to ensure that students understand their rights and can make informed decisions about potential actions they can take. Specifically, the provincial government should communicate human rights protections in housing under O. Reg. 290/98 and the *Code*, and remedies available to prospective tenants through “Renting in Ontario,”²⁰⁰ or similar resources, as well as through promotional materials posted at post-secondary institutions and other public places so they are easily accessible for students.

Students may also be unaware of resources available to support them in making a decision about potential actions, navigating the process to seek remedies, or answer their questions. Resources like Steps to Justice – a project led by Community Legal Education Ontario (CLEO) and funded by Legal Aid Ontario, the Law

¹⁹⁷ Tamunoibifiri Fombo and Dhriti Gupta, “The Struggle to Secure Housing as a Black Student,” *The Eyeopener*, January 28, 2020, <https://theeyeopener.com/2020/01/the-struggle-to-secure-housing-as-a-black-student/>; Erica Alini, “What it’s Like to Rent as a Black Canadian: ‘I Don’t Even Have a Chance,’” *Global News*, June 27, 2020, <https://globalnews.ca/news/7082858/renting-while-black-canada/>; Kathleen Newman-Bremang and Nadia Ebrahim, “6 Women on the Reality of Renting While Black in Canada,” *Refinery29*, March 26, 2021, <https://www.refinery29.com/en-ca/2021/03/9367732/racism-while-renting-canada>; Cara Nightingale, “‘It Was Easy to Look for a Place But Hard to Actually Get One’: University Students’ Experiences of Racial Discrimination in Off-Campus Housing,” MA thesis, (Brock University, 2016).

¹⁹⁸ Nightingale, “University Students’ Experiences of Racial Discrimination in Off-Campus Housing”.

¹⁹⁹ *Human Rights and Rental Housing in Ontario: Background Paper* (Ontario Human Rights Commission, March 28, 2007).

²⁰⁰ “Renting in Ontario: Your Rights,” *Government of Ontario*, updated April 14, 2021, <https://www.ontario.ca/page/renting-ontario-your-rights>.

Foundation of Ontario, and the Department of Justice Canada offering step-by-step guides on how to seek legal remedies in discrimination in housing²⁰¹ – and the Human Rights Legal Support Centre – offering free resources and human rights legal services to individuals in Ontario who have been discriminated against contrary to the *Code*²⁰² – are affordable, accessible, and high quality supports available to all Ontarians, including students. Information about these resources should be widely advertised by the provincial government and included in student-focused communications and materials. Additionally, because racialized and religious international students experience racism and religious discrimination in housing and may require additional support navigating these experiences, it is important that available resources are accessible to them. To this end, the provincial government should expand resources available through Steps to Justice and the Human Rights Legal Support Centre to meet the needs of international and other non-official language speaking students. This should involve increased funding to translate resources into multiple languages, provide translation services for consultations and communications, and ensure that services and resources are culturally relevant to reflect a diversity of experiences.

EMPLOYMENT

Principle: Students should not face racism or religious discrimination based on their racial and/or religious identity.

Principle: Students should not face racism or religious discrimination when seeking and undertaking employment.

Concern: Students may experience covert and overt racism or religious discrimination when searching for employment or while working as a result of their racial and/or religious identity.

Concern: Students experiencing racism or religious discrimination while seeking or during employment may not be aware of their options for recourse.

Concern: Employers may not have strong equity, diversity, and inclusion practices in their hiring processes.

Recommendation: The provincial government should communicate human rights protections for workers under the *Ontario Human Rights Code* and remedies available to students through “Young Workers,” or similar resources.

Recommendation: The provincial government should communicate human rights protections for workers under the *Ontario Human Rights Code* and remedies available to students through promotional materials posted at post-secondary institutions and other public places.

Recommendation: The provincial government should ensure that resources on equitable and inclusive hiring and employment practices are grounded in responsible and meaningful consultation and are widely publicized to employers.

Students experience racism and religious discrimination in their employment searches and when they are working in their communities. In a 2019 survey, 34 and 27 percent of Canadians said that Indigenous and Black people, respectively, were treated less fairly; 40 percent had witnessed racial discrimination; and 38 percent had personally experienced racial discrimination in the workplace.²⁰³ Students have reported

²⁰¹ “Steps to Justice,” *Steps to Justice*, n.d., online: <https://stepstojustice.ca/>.

²⁰² “Human Rights Legal Support Centre,” *Human Rights Legal Support Centre*, n.d., online: <https://www.hrlsc.on.ca/en/home>.

²⁰³ Environics Institute for Survey Research, *Race Relations in Canada 2019: A Survey of Canadian Public Opinion and Experience Final Report* (Canadian Race Relations Foundation, 2019), 32, 39, 42.

experiences of tokenism and being ridiculed by managers for their race.²⁰⁴ Studies have also illustrated the role of bias in hiring practices, often as a result of stereotypes or false perceptions tied to a person's name.²⁰⁵

The *Ontario Human Rights Code (Code)* states that “every person has a right to equal treatment with respect to employment without discrimination or harassment because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed,” and other protected grounds.²⁰⁶ Despite these protections, students feel there are limited options for recourse when they encounter racism or religious discrimination when seeking employment or working. Even if students are aware that *Code* protections exist, they may be unaware of the process for accessing remedies, or even what remedies might look like. Therefore, the provincial government should make efforts to better communicate available protections and remedies to ensure that students understand their rights and can make informed decisions about potential actions they can take. Specifically, the provincial government should communicate human rights protections in employment under the *Code*, and remedies available to for workers through “Young Workers,”²⁰⁷ or similar resources, as well as through promotional materials posted at post-secondary institutions and other public places so they are easily accessible for students.

Students may also be unaware of resources available to support them in making a decision about potential actions, navigating the process to seek remedies, or answer their questions. Resources like Steps to Justice – a project led by Community Legal Education Ontario (CLEO) and funded by Legal Aid Ontario, the Law Foundation of Ontario, and the Department of Justice Canada offering step-by-step guides on how to seek legal remedies in discrimination in employment²⁰⁸ – and the Human Rights Legal Support Centre – offering free resources and human rights legal services to individuals in Ontario who have been discriminated against contrary to the *Code*²⁰⁹ – are affordable, accessible, and high quality supports available to all Ontarians, including students. Information about these resources should be widely advertised by the provincial government and included in student-focused communications and materials.

Another student concern is that there continue to be gaps in equity, diversity, and inclusion practices applied to hiring processes. Employers have a responsibility to protect against, and not engage in, discriminatory hiring practices, and gaps in equity, diversity, and inclusion practices contribute to failures in meeting these responsibilities. This can result in a range of discriminatory practices, from tokenism, to passing qualified candidates over in interviews, which contributes to inequities in employment and income based on race. The availability of race-based data, which has only recently been collected and reported on by Statistics Canada, demonstrates the impact of exclusionary hiring practices. For example, unemployment rates are highest and rising the fastest for Southeast Asian (20.1%), Black (16.4%), Latin American (16.6%), and Chinese (10.8%) Canadians.²¹⁰ In 2021 the provincial government announced a partnership with CivicAction to “identify concrete actions employers can take to enhance workplace opportunities for Indigenous, Black and racialized employees.”²¹¹ The goal is to create digital resources for employers based on a virtual roundtable discussion “helping employers better understand the distinct experiences and challenges faced by Indigenous, Black and racialized talent in entering the workforce and advancing their careers; [and] identify promising practices and tools to help employers tap into Ontario's diverse workforce.”²¹² While this is a good first step with a laudable goal, OUSA emphasizes the

²⁰⁴ Kamil Karamali, “Combatting Racism in the Workplace Begins at the Top, But Many People of Colour Can’t Get There: Experts,” *Global News*, June 11, 2020, <https://globalnews.ca/news/7057053/anti-black-racism-in-workplace/>.

²⁰⁵ Truc Nguyen, “What’s in a Name? We Talk to Experts About Racial Bias in Hiring and How to Work to Change it,” *CBC Life*, September 13, 2018, <https://www.cbc.ca/life/culture/what-s-in-a-name-we-talk-to-experts-about-racial-bias-in-hiring-and-how-to-work-to-change-it-1.4822467>.

²⁰⁶ *Human Rights Code*, R.S.O. 1990, c. H. 19, s. 5(1).

²⁰⁷ Ministry of Labour, Training and Skills Development, “Young Workers,” *Government of Ontario*, last modified July 10, 2018, <https://www.labour.gov.on.ca/english/atwork/youngworkers.php>.

²⁰⁸ “Steps to Justice”.

²⁰⁹ “Human Rights Legal Support Centre”.

²¹⁰ Statistics Canada, “Labour Force Survey, January 2021,” *The Daily*, February 5, 2021, <https://www150.statcan.gc.ca/n1/daily-quotidien/210205/dq210205a-eng.htm>.

²¹¹ Government of Ontario, “Ontario Working with Multi-Sector Leaders to Improve Diversity in the Workplace,” *Newsroom*, January 26, 2021, <https://news.ontario.ca/en/release/60116/ontario-working-with-multi-sector-leaders-to-improve-diversity-in-the-workplace>.

²¹² Government of Ontario, “Ontario Working with Multi-Sector Leaders to Improve Diversity in the Workplace”.

importance of responsible and meaningful consultation with racialized workers, including students, in the development of these resources. Additionally, these resources should include a focus on equitable and inclusive hiring and be widely publicized to employers.

POLICY STATEMENT

Whereas: Students' post-secondary education should be free of racism and religious discrimination.

Whereas: Post-secondary institutions play a key role in creating an environment free of racism and religious discrimination and addressing racism and religious discrimination should it arise.

Whereas: The provincial government plays a key role in ensuring that post-secondary education is equitable across the entire sector.

Whereas: All willing and qualified students should have equitable access to post-secondary education.

Whereas: All willing and qualified students from religious secondary and post-secondary institutions should be adequately supported if they choose to transfer to a publicly-assisted post-secondary institution.

Whereas: A well-supported transition to post-secondary is critical for students to feel confident in their ability to succeed in their post-secondary program.

Whereas: Access initiatives designed to promote entry into post-secondary education are more effective when combined with transition/bridging programs upon and after entry.

Whereas: Institutional support for racialized students as they transition to post-secondary is necessary to close the post-secondary access gap.

Whereas: Decolonizing academia is a critical step to achieving racial equity in post-secondary education.

Whereas: Decolonizing academia is a critical step to giving Black, Indigenous, and People of Colour the ability to thrive in post-secondary institutions.

Whereas: Faculty, staff, and student diversity enriches the educational experiences of all post-secondary students.

Whereas: Collection of race-based data in post-secondary institutions is a critical first step in overcoming systemic barriers for Black, Indigenous, and People of Colour.

Whereas: Academic freedom should not be used as a veil to further, or means to entrench, racial prejudice.

Whereas: All post-secondary students deserve a safe, dignified, and trauma-free post-secondary experience.

Whereas: Principles on freedom of expression in the *Canadian Charter of Rights and Freedoms* should be upheld on Ontario post-secondary campuses.

Whereas: Post-secondary institutions must cultivate a safe and inclusive environment for all students.

Whereas: All students regardless of racial or religious identity should have equitable access to, and experiences with, student support services on post-secondary campuses.

Whereas: Indigenous Student Centres and Associations on university campuses are critical for providing culturally relevant supports for Indigenous students.

Whereas: Students from racialized and religious groups should have access to health care services that are culturally relevant and sensitive and that are able to meet their diverse identities and needs.

Whereas: All students should be made to feel comfortable when accessing and using health care services on campus.

Whereas: All post-secondary students deserve a safe, dignified, and trauma-free post-secondary experience.

Whereas: Post-secondary institutions have a responsibility to address the prevalence of racial and religious discrimination.

Whereas: Post-secondary institutions have a duty to accommodate students' religious and cultural beliefs and practices to the point of undue hardship as defined under the *Ontario Human Rights Code*.

Whereas: The Ontario Human Rights Commission recommends that organizations, including post-secondary institutions, should seek to adopt the principles of "inclusive design" to proactively remove barriers for people of diverse faiths and cultures, minimizing the need for people to request individual accommodations.

Whereas: Students of diverse faiths and cultures should not face barriers to their academic and student life as a result of a lack of institutional support or understanding.

Whereas: Students should be supported by faculty, instructors, and staff when accessing accommodations, and students should not face negative academic consequences for the observation of religious and cultural practices.

Whereas: The process for seeking and receiving accommodations for the observation of religious and cultural practices should be clear and accessible to students, faculty, and staff.

Whereas: Acceptance and promotion of diverse faiths and cultures is beneficial to all students in a post-secondary institution.

Whereas: All students should feel safe and welcome on campus.

Whereas: Communication of funding, governance, and hiring practices of campus security systems should be transparent and easily accessible.

Whereas: Students and community members should be active members in shaping campus safety methods, funding, and providing oversight to ensure clear reporting guidelines and accountability measures.

Whereas: Post-secondary institutions must create safe and inclusive environments for their students.

Whereas: Post-secondary institutions should be held accountable for furthering racial and religious equity on their campuses.

Whereas: Post-secondary institutions must be held accountable for responding to acts of racial and religious injustice on their campuses.

Whereas: Post-secondary institutions have a key role to play in attaining and maintaining racial and religious equity in the post-secondary education sector.

Whereas: Ethical and equity-based data collection and research is needed to better understand and address racial and religious equity in post-secondary education.

Whereas: The collection of equity-based data should be done in a purposeful and responsible manner.

Whereas: Students should feel safe and welcomed in the community surrounding their post-secondary institution.

Whereas: Students should not face racism or religious discrimination based on their racial and/or religious identity.

Whereas: Every community member plays a role in creating a safe and inclusive community.

Whereas: Crisis response services play a key role in creating and maintaining a safe community for all.

Whereas: Students should not face racism or religious discrimination based on their racial and/or religious identity.

Whereas: Students should not face racism or religious discrimination when seeking and living in rental accommodations.

Whereas: Students should not face racism or religious discrimination based on their racial and/or religious identity.

Whereas: Students should not face racism or religious discrimination when seeking and undertaking employment.

Be it resolved that: The provincial government should amend the *Ministry of Training, Colleges and Universities Act* to require all post-secondary institutions to have a standalone racial and religious equity policy.

Be it further resolved that (BIFRT): The provincial government should create a regulation setting out requirements with regard to the content of racial and religious equity policies at post-secondary institutions.

BIFRT: The provincial government should strike an advisory committee of racialized and religious students, faculty, staff, administrators, and community leaders in the creation of legislation and regulation with regard to the content of racial and religious equity policies at post-secondary institutions.

BIFRT: Through regulation, the provincial government should mandate that post-secondary institutions create their own equity, diversity, and inclusion action plans that include addressing and evaluating student recruitment strategies as well as those for hiring faculty and student-facing staff, with emphasis on the recruitment of Black, Indigenous, and other underrepresented People of Colour.

BIFRT: The Ministry of Education and the Ministry of Colleges and Universities should work together to reform their current policies on equitable access to higher education and increase resources, including, but not limited to, funding and supports, to improve access to post-secondary education for underrepresented students instead of solely focusing on expanding overall post-secondary enrollment.

BIFRT: The Ministry of Education should develop and implement income-targeted enrichment programs throughout students' primary and secondary education to ensure that underrepresented groups have equitable access to high-quality supplementary support with regard to post-secondary education.

BIFRT: The provincial government should work with relevant stakeholders to conduct studies on systemic racism across campuses and establish best practices for equitable and inclusive teaching practices to combat the effects of systemic racism and implicit racial bias that affects some racialized students, especially Black and Indigenous students, within the primary and secondary education system.

BIFRT: The provincial government should reintroduce the Ensuring Equitable Access to Post-secondary Education Strategy program, or a similar program, to provide school boards with funding for pilot projects, as well as enrichment and extracurricular programming, that support Ontario's Access to Post-Secondary Education strategy.

BIFRT: The Ministry of Education should responsibly and meaningfully engage and consult with relevant stakeholders to outline a clear strategy and timeline for destreaming high school courses in grades 9 and 10.

BIFRT: The Ministry of Education should mandate that academic and applied course streaming be postponed until Grade 11 and 12.

BIFRT: The Ministry of Education should mandate that all school boards implement a strategic plan to

provide students with an in-depth understanding of the academic and applied streaming process and the corresponding post-secondary pathways that they lead to.

BIFRT: The provincial government should incentivize post-secondary institutions to provide more race-based scholarships to underrepresented racialized students from low socio-economic backgrounds, through a special Strategic Mandate Agreement funding stream tied to increasing access to underrepresented groups.

BIFRT: The provincial government should provide accessible provincial-wide financial aid information sessions for students in high school and their guardians or supports, targeted at racialized students from low socio-economic backgrounds, and ensure they are adequately promoted to all students and their guardians or supports.

BIFRT: The provincial government should increase funding allocated to OSAP in order to implement specific streams of OSAP to provide additional funding for self-identified racialized students from low socio-economic backgrounds.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario to conduct research on the financial concerns of low-income students who are also racialized to inform effective strategies to financially support these students.

BIFRT: The provincial government should work with necessary stakeholders and regulators to address any gaps that are present for students in the transfer process from religious secondary education institutions to publicly-assisted secondary education institutions.

BIFRT: The provincial government should task the Ontario Council on Articulation and Transfer to work with stakeholders to address any gaps that are present for students in the transfer process from religious post-secondary institutions to publicly-assisted post-secondary institutions.

BIFRT: The provincial government should reinvest in and expand the Ensuring Equitable Access to Postsecondary Education Strategy program to provide special ongoing grant funding towards core costs of piloting and continuing postsecondary transition programs that are informed by research and local contexts with the goal of supporting students who face barriers to post-secondary access.

BIFRT: The provincial government should incentivize post-secondary institutions to invest in supporting racialized students through measurable metrics (including retention and successful experiences of students from underrepresented populations) under the next iteration of Strategic Mandate Agreements.

BIFRT: The Ministry of Colleges and Universities should work with the Ministry of Education and the Ministry of Children, Community and Social Services to integrate access initiatives and transition programs, considering the local context and existing evidence and best practices, to support underrepresented and racialized students transition to their post-secondary institution.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario with working with institutional and community partners to review existing transition/bridging programs, identify best practices for transition/bridging programs, and provide a framework to improve support for underrepresented and racialized students upon entry to post-secondary education.

BIFRT: The provincial government should mandate the collection of disaggregated race-based data using the Data Standards for the Identification and Monitoring of Systemic Racism for the purposes of identifying programming to support the transition of racialized students to post-secondary education.

BIFRT: The provincial government should contract organizations with a deep understanding of decolonizing practices and a demonstrated commitment to decolonizing academia, in responsible and meaningful consultation with faculty and students, to develop best practices and procedures that will guide decolonization efforts in post-secondary institutions.

BIFRT: The provincial government should require, and provide adequate funding for, post-secondary

institutions to provide mandatory training using evidence-informed methods for faculty and student-facing staff on anti-racism (particularly anti-Black and anti-Indigenous racism), that reflects lived experiences and is trauma-informed, in order to enhance cultural sensitivity and promote positive classroom experiences for Black and Indigenous students.

BIFRT: The provincial government should create a task force composed of students, staff, administrators, and faculty to develop best practices for responding to disclosures of racial discrimination and reporting processes on university campuses and other pertinent equity matters. The government should also provide funds to enable the task force to raise awareness of reporting channels and measure their success.

BIFRT: The provincial government should mandate the amendment of undergraduate Degree Learning Expectations to require all students to develop competencies in equity and diversity and that any organizations contracted by the government should also develop best practices on how to incorporate equity issues into current curriculum, including Indigenization.

BIFRT: The provincial government should create a fund for post-secondary institutions to conduct equity audits that will help identify equity gaps in institutional hiring and retention practices, and inform the creation of policy, programs, and services to be developed for Black, Indigenous, and People of Colour.

BIFRT: The provincial government should mandate that post-secondary institutions create policies, in responsible and meaningful consultation with faculty, staff, and students, on the use of racial slurs, hateful rhetoric, that are trauma-informed and consider historical context.

BIFRT: The provincial government should mandate that post-secondary institutions make trauma-informed and anonymous reporting mechanisms available for all students who experience harm in the classroom (or online) as a result of course content and/or interactions with fellow students, faculty, and staff.

BIFRT: The provincial government should require post-secondary institutions to provide mandatory training for faculty, staff, and students on anti-racism that reflects lived experiences and is trauma-informed, in order to enhance cultural sensitivity and promote positive academic experiences, particularly for Black, Indigenous, and People of Colour.

BIFRT: The provincial government should direct the Higher Education Quality Council of Ontario to collaborate with post-secondary institutions and other relevant stakeholders to conduct research into best practices on cultivating and integrating a culture of equity, diversity, and inclusion within post-secondary communities and student support services.

BIFRT: The provincial government should mandate that post-secondary institutions implement re-occurring, mandatory equity, diversity, and inclusion training and ongoing education opportunities for all student-facing staff and volunteers.

BIFRT: The provincial government should provide envelope funding to programs, services, and offices that provide specific support to racialized and religious students at post-secondary institutions.

BIFRT: The provincial government should mandate that post-secondary institutions evaluate, using standardized metrics, the effectiveness of their equity, diversity, and inclusion policies in addressing students' concerns as it relates to student support services.

BIFRT: The provincial government should provide increased and ongoing funding for Indigenous Student Centres through the Postsecondary Education Fund for Aboriginal Learners, without the need for recurring grant applications.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario with conducting research into equity, diversity, and inclusion issues present in student wellness centres and examine best practices for offering equitable physical and mental health services to students.

BIFRT: The provincial government should mandate that all student-facing health services staff undergo mandatory, re-occurring equity, diversity, and inclusion training and ongoing education opportunities.

BIFRT: The provincial government should allocate a certain portion of post-secondary mental health care funding to the hiring of more racialized staff who can better understand and address the unique perspective and needs of racialized students.

BIFRT: The provincial government should provide funding for community-based mental health care providers to supply culturally relevant and diverse counselling and support groups for post-secondary students.

BIFRT: The provincial government should mandate that post-secondary institutions develop support programs for underrepresented racialized students attending and applying to health care programs.

BIFRT: The provincial government should mandate that post-secondary institutions make trauma-informed and anonymous reporting mechanisms available for all students who experience racial and religious discrimination in post-secondary institutions.

BIFRT: The provincial government should provide funding for research on religious discrimination and its effects in post-secondary institutions, with a focus on antisemitism and Islamophobia.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario with conducting research on racism towards the Asian and Pacific Islander communities and its effects in post-secondary institutions.

BIFRT: The provincial government should use this research to create best practices to inform institutional responses and policies to address religious discrimination on post-secondary institutions.

BIFRT: The Ministry for Colleges and Universities should task the Higher Education Quality Council of Ontario to work with the Ontario Human Rights Commission to release a basic framework with general guidelines for implementing institutional accommodation policies and reporting procedures that are student-centred and abide by the *Ontario Human Rights Code*.

BIFRT: The Ministry of Colleges and Universities should require all postsecondary institutions to clearly communicate accommodation policies and reporting procedures to students, faculty, and staff.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario to conduct an audit of current accommodation practices at Ontario universities and how equipped faculty and staff feel to support accommodations according to institutional policies and the *Ontario Human Rights Code*.

BIFRT: The provincial government should provide funding, according to institutional need, for centralized offices with staff equipped with the training and expertise to provide guidance to faculty and administration on accommodation for religious and cultural practices.

BIFRT: The provincial government should provide direction and funding, according to institutional need, for the reasonable allotment of physical spaces on campus to facilitate the observation of certain religious and cultural practices.

BIFRT: The provincial government should task the Higher Education Quality Council of Ontario with conducting research on the effectiveness of police on campus and their effect on racialized students.

BIFRT: The provincial government should mandate that institutions conduct responsible and meaningful consultations with all campus community members – particularly Black, Indigenous, and racialized students – to collect community concerns and create a long-term community-informed plan for campus safety.

BIFRT: The provincial government should mandate that institutions conduct annual reviews of the

effectiveness of current campus security practices, policies, systems, and infrastructure with active engagement of Black, Indigenous, and racialized students and communicate findings in a public, accessible manner to students.

BIFRT: The provincial government should mandate that institutions publish current data collection processes regarding campus security/special constable systems to students in a clear and accessible manner.

BIFRT: The provincial government should mandate that institutions provide a clear and accessible breakdown of funding of campus security systems to students and the general public.

BIFRT: The provincial government should mandate that institutions provide mandatory community policing, de-escalation, anti-racism, and Indigenous cultural competency training to all current security officers and/or special constables serving on campuses.

BIFRT: The government should develop a common standard for universities to collect demographic data, including disaggregated race-based data, and mandate that campus security collect and report demographic data on interactions.

BIFRT: The provincial government should amend Part IV, section 28 of the *Comprehensive Ontario Police Services Act, 2019* to specify that, where a municipal police service board appoints special constables to be employed by a post-secondary institution, the municipal diversity plan include diverse student representation from Black, racialized, and/or Indigenous communities.

BIFRT: The provincial government should provide special grant funding for training and staffing of student-led and community-led non-enforcement crisis intervention response teams on campuses.

BIFRT: The provincial government should mandate that post-secondary institutions create a public plan within three years through responsible and meaningful consultation with students to create more compassionate, community-informed, and culturally and racially diverse campus safety models, including the re-allocation of funding from any existing and future campus security or policing budgets to student-led and community-led non-enforcement crisis intervention services, social services, and mental health supports on campuses.

BIFRT: The provincial government should create a fund for post-secondary institutions to conduct equity audits that will help identify gaps in institutional hiring and prioritize hiring of Black, Indigenous, and racialized campus security.

BIFRT: The provincial government should responsibly and meaningfully consult with Black, Indigenous, racialized, and religious students on what racial and religious equity looks like at their post-secondary institutions to develop equity metrics for the next iteration of Strategic Mandate Agreements.

BIFRT: The provincial government should incentivize post-secondary institutions to invest in racial and religious equity work through a performance metric under the next iteration of Strategic Mandate Agreements.

BIFRT: The provincial government should commission research that outlines actionable steps to reduce the impact of systemic racism on post-secondary education and dismantle systemic racism in education.

BIFRT: The provincial government should mandate that post-secondary institutions have independent, confidential reporting structures for students, staff, and faculty to raise concerns on equity issues.

BIFRT: The provincial government should develop consistent and recurring grants for equity workers, offices, programs, and services at post-secondary institutions.

BIFRT: The provincial government should commission research, and responsibly and meaningfully consult with Black, Indigenous, and racialized students, to ensure that the Data Standards for the Identification and Monitoring of Systemic Racism can be appropriately applied to the post-secondary

education sector.

BIFRT: The provincial government should mandate the collection of equity-based data, using the Data Standards for the Identification and Monitoring of Systemic Racism, at all stages of post-secondary education processes.

BIFRT: The provincial government should mandate the collection of equity-based data in the post-secondary education sector such that an all-encompassing set of data is collected at least every three years.

BIFRT: The provincial government should increase funding allocated for Anti-Racism Initiatives under the Anti-Racism Directorate with a dedicated stream of funding for initiatives that benefit post-secondary students and other youth.

BIFRT: The provincial government should responsibly and meaningfully consult with Black, Indigenous, and racialized students to ensure Canada's Anti-Racism Strategy meets the needs of students in Ontario then work with the federal government on implementation of the strategy.

BIFRT: The provincial government should responsibly and meaningfully consult with racialized youth, including post-secondary students, to amend Ontario's 3-Year Anti-Racism Strategic Plan following a review to update the timeline, targets, and indicators to support the work of Canada's Anti-Racism Strategy, with an emphasis on youth-focused initiatives.

BIFRT: The provincial government should amend the *Anti-Racism Act, 2017*, s.4 to mandate responsible and meaningful consultation with racialized students most adversely impacted by racism.

BIFRT: Ontario's 3-Year Anti-Racism Strategic Plan should include a target under "Education sector indicators" for the percent and number of post-secondary institutions collecting race-based data.

BIFRT: Ontario's 3-Year Anti-Racism Strategic Plan should include a target under "Education sector indicators" for the enrollment of Black, Indigenous, and racialized students in post-secondary education compared to demographics of the general population, percent and number of post-secondary institutions collecting race-based data, and response rates in the collection of personal information by post-secondary institutions.

BIFRT: The provincial government should responsibly and meaningfully consult widely, including with post-secondary students, on prospective Anti-Racism Initiatives and projects for the Anti-Racism Directorate to undertake.

BIFRT: The provincial government should work with regions and municipalities to ensure that there is accessible, comprehensive, no-cost access to mobile crisis intervention services for every member of the community, including post-secondary campuses, which do not call or involve the police.

BIFRT: The provincial government should task the Ontario Human Rights Commission to develop, in consultation with experts, a formalized definition of anti-Asian racism.

BIFRT: The provincial government should communicate human rights protections in housing under O. Reg. 290/98 and the *Ontario Human Rights Code*, and remedies available to prospective tenants through "Renting in Ontario," or similar resources.

BIFRT: The provincial government should communicate human rights protections in housing under O. Reg. 290/98 and the *Ontario Human Rights Code*, and remedies available to prospective tenants through promotional materials posted at post-secondary institutions and other public places.

BIFRT: The provincial government should widely advertise information available through Steps to Justice and the Human Rights Legal Support Centre in student-focused resources.

BIFRT: The provincial government should expand resources available through Steps to Justice and the

Human Rights Legal Support Centre to support international students and other non-official language speaking students.

BIFRT: The provincial government should communicate human rights protections for workers under the *Ontario Human Rights Code* and remedies available to students through “Young Workers,” or similar resources.

BIFRT: The provincial government should communicate human rights protections for workers under the *Ontario Human Rights Code* and remedies available to students through promotional materials posted at post-secondary institutions and other public places.

BIFRT: The provincial government should ensure that resources on equitable and inclusive hiring and employment practices are grounded in responsible and meaningful consultation and are widely publicized to employers.