

Item 13.1.1

# AUDITOR GENERAL

Halifax Regional Municipality



## Diversity and Inclusion Audit

December 2024

**December 5, 2024**

The following audit of **Diversity and Inclusion**, completed under section 50(2) of the Halifax Regional Municipality Charter, is hereby submitted to the Audit and Finance Standing Committee of Regional Council.

Respectfully,

*Original signed by*

Andrew Atherton, CPA, CA  
Auditor General  
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# Diversity and Inclusion Audit

## HRM is Taking Steps to Advance Diversity and Inclusion



## Gaps in Oversight of Diversity & Inclusion Framework Implementation



## Improvements Needed to Ensure Progress is Meaningful and Aligned with Goals

**Auditor General Halifax Regional Municipality  
December 2024**

## Audit Results

HRM business units are taking steps to advance diversity and inclusion in their everyday operations. There have been various policies implemented along with programs and services offered which help achieve HRM's Diversity & Inclusion Framework goals. Additionally, the Office of Diversity & Inclusion supports business units with their diversity and inclusion initiatives while also implementing their own strategies.

While work is being completed towards diverse and inclusive workplaces, programs, and services, there is a lack of central oversight and monitoring to assess whether work occurring or planned is appropriate to achieve the framework goals. These are necessary to ensure initiatives are meaningful and that business unit's work is prioritized and aligns with the framework. There are quarterly and annual reports with updates on framework implementation, but they lack performance measures and do not always clearly connect actions with framework goals.

Overall, HRM has implemented actions and initiatives which demonstrate their commitment to diversity and inclusion. Further improvements are needed to ensure planning and implementation of this work is effectively managed, focused and intentional.

## HRM is Taking Steps to Advance Diversity and Inclusion

HRM business units have implemented programs and taken actions that align with the goals in the Diversity & Inclusion Framework. We reviewed these items within the Office of Diversity & Inclusion along with six business units and found actions were taken in each business area to advance and support diversity and inclusion.

The Diversity & Inclusion Framework was developed to assist business units with the continued efforts to advance diversity and inclusion within its workforce, programs, and services. It is important all HRM business units are committed and taking action to recognize and address barriers that may leave some communities and groups underserved and overlooked when it comes to receiving municipal services, participating in programs, or working for the municipality.

### Diversity & Inclusion Framework Goals

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1. Inclusive public service
2. Safe, respectful, and inclusive work environment
3. Equitable employment
4. Meaningful partnerships
5. Accessible information and communication

*(Source: HRM's Diversity & Inclusion Framework)*

**Office of Diversity & Inclusion has strategies; supports business units**

The Office of Diversity & Inclusion/African Nova Scotian Affairs Integration Office (Office of D&I), a division within the CAO’s Office, developed three strategies – Accessibility, French-Language Services, and Immigration – which have objectives and actions aligned with the framework goals. The Office of D&I also manages the recommendations from the *Task Force on the Commemoration of Edward Cornwallis and the Recognition and Commemoration of Indigenous History* report (Indigenous History).

We tested a sample of objectives and actions from the three strategies and the Indigenous History report and found many have been implemented or steps have been taken (in progress) towards implementation. This is further detailed in Appendix 2.

**Testing Results – Office of D&I Strategies**

Strategy/ Report	Complete/ Ongoing	In Progress	Not Started	Total
Accessibility	2	9	1	12
French-Language Services	11	1	0	12
Immigration	6	5	3	14
Indigenous History (Task Force)	5	3	3	11

Examples of completed actions we tested include:

- Improvements to accessibility pages on Halifax.ca, and development of a workplace accommodation policy
- Development of French-language materials and tools to promote bilingualism, and internal/external French-language training opportunities
- Established partnerships with immigrant-serving organizations, and identified opportunities for HRM to work with community partners
- Hosted the 2023 North American Indigenous Games showcasing Mi’kmaw history and culture, and renamed Cornwallis Street to Nora Bernard Street

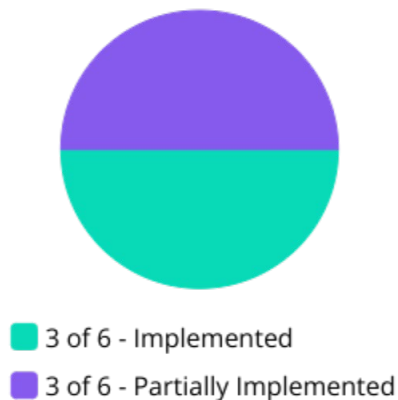
Office of D&I management told us they are also developing strategies for Anti-Black Racism, Gender Equity, and Indigenous Services. Office of D&I staff said the Anti-Black Racism Strategy will be rolled out in Fall 2024, three years after the original timeline of late 2021, while the Gender Equity Strategy and Indigenous Services Strategy are still in development with no timeline for implementation.

The Office of D&I is also responsible to provide support, expertise, and advice to HRM business units. Both Diversity & Inclusion Advisors and business unit management and staff told us they work together on diversity and inclusion related initiatives, including programs and policies. This was consistent with what we saw throughout our audit. The Office of D&I also leads corporate diversity and inclusion training which includes mandatory overview training and six elective training courses.

### ***Business units have taken steps in their business area***

We found all six HRM business units included in the audit have taken steps to help support and advance diversity and inclusion in their business areas. While all business units have responsibilities under the Diversity & Inclusion Framework, they also have independent operational requirements which may require a different approach to implement this work. With this understanding, the number of diversity and inclusion actions and initiatives sampled for each business unit varied. See below for a summary of what we found in each business unit tested. For detailed information, see Appendix 3.

#### *Halifax Regional Fire & Emergency (Halifax Fire)*



We tested six actions.

Halifax Fire's implemented actions include collecting and analyzing workforce data and identifying opportunities to work with internal and external partners to create an accessible and inclusive municipality. While they did not have a formal communications plan, Halifax Fire recognizes significant diversity and inclusion dates through communication tools (e.g. African Heritage Month, International Women's Day, International Day of Peoples with Disabilities).

We also identified Halifax Fire has taken additional steps to advance diversity and inclusion including:

- Dedicated D&I role – Assistant Chief, Workplace Culture
- Embedded Diversity & Inclusion Advisor – Office of D&I Advisor works within Halifax Fire
- HRFE D&I training – Building a Better Fire Service
- HRFE D&I committee – Outreach and Inclusion Committee
- D&I Key Deliverable – dedicated D&I deliverable outlining their plans for the year



### Halifax Regional Police



■ 4 of 5 - Implemented  
■ 1 of 5 - Not Complete

We tested five actions.

The implemented actions include adding 2SLGTQIA+ to 2023 training for all staff, implementing a project to showcase diverse officers in various office locations, and completing consultations with diverse communities to both provide information and better inform the newly formed Hate Crime Unit.

We also found Halifax Regional Police has taken additional steps to advance diversity and inclusion including:

- Dedicated D&I role – Equity and Diversity Officer
- Cadet D&I training – includes 10 diversity and inclusion sessions
- Police D&I policies – includes Valuing Race Relations & Diversity
- Supported employee-initiated group – Rainbow Internal Support Network (R-ISN)

### Halifax Transit



■ 5 of 6 - Implemented  
■ 1 of 6 - Partially Implemented

We tested six actions.

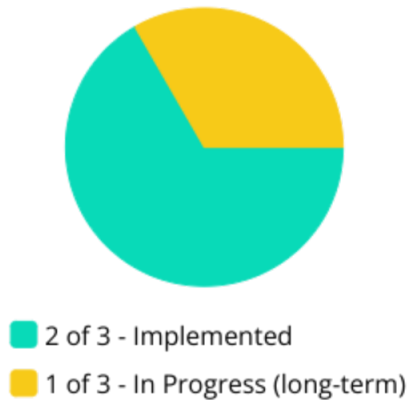
This included implementing its 'Transit Code' to promote expectations of passengers with focus on safety, courtesy and respect, developing and providing training to targeted groups who may not feel comfortable using transit, and engaging with community organizations.

Additionally, we identified Halifax Transit has taken additional steps to advance diversity and inclusion including:

- Assessed bus stop accessibility – identified improvements
- Bus operator D&I training – onboarding training 'Becoming an Ally'
- Transit D&I Advisory committee – formed to identify and oversee initiatives
- Accessibility Strategy – supports implementation of certain actions items



### Human Resources



We tested three actions.

Work included building career development programs and tools to support employment equity candidates being successful in achieving leadership positions (Aspiring Leaders Program, which aims to provide training and tools to employees seeking leadership positions, had a designated cohort for African Nova Scotian or African Descent employees) and promoting HRM employment opportunities through engagement with community-based organizations (attended job fairs, including BIPOC Atlantic Job Fair).

In addition, we noted Human Resources has taken additional steps to advance diversity and inclusion including:

- Updated Respectful Workplace Policy – scope expands on previous policy to now also address microaggressions and culturally insensitive behaviours
- Policy development and review process – includes consultation with Office of D&I
- Hiring Manager Certification training – includes D&I topics
- Accessibility Strategy – supports implementation of certain action items

### Parks & Recreation



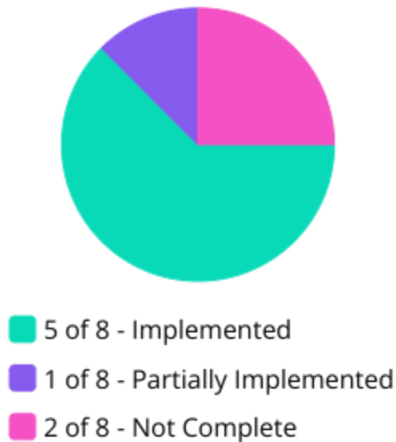
We tested three actions.

The work implemented includes connecting with underrepresented groups to ensure greater access to recreation programs (inclusive sports program introduced at St. Andrew's Community Centre, working with the Youth Project in coordinating pride events) and completing deliverables to support the development of the Senior Services Plan.

We also identified Parks & Recreation has taken additional steps to advance diversity and inclusion including:

- Inclusive Specialist roles – work in Recreation Programming
- Indigenous History Report – supports implementation of certain action items
- Culture & Heritage Priorities Plan – supports implementation of certain action items

Planning & Development (P&D)



We tested eight actions.

The implemented actions include completing public consultations with various communities and groups related to the development of the Culture and Heritage Priorities Plan, developing a standard approach for community engagement, and hiring a NS African Heritage Intern.

We also found Planning & Development has taken additional steps to advance diversity and inclusion including:

- Dedicated role – African Nova Scotian Community Action Plan Coordinator
- Embedded Diversity & Inclusion Advisor – Office of D&I Advisor works within P&D
- Mandated HRM elective training – Anti-Black Racism training to be completed by all business unit staff
- Indigenous History Report – supports implementation of certain action items
- Culture & Heritage Priorities Plan – supports implementation of certain action items
- African Nova Scotian Road to Economic Prosperity action plan – supports implementation of certain action items

***Policies, resources, and information communicated to employees***

HRM has diversity, equity, and inclusion policies; resources; and information available to employees. This information is shared on the HRM intranet and Halifax.ca website. In addition, there are regular all-staff emails from the CAO and Employee Bulletins which provide awareness and information on significant dates, events, training programs, and policies. We identified workplace accommodations (efforts to reduce barriers that may prevent participation in the workplace), and multilingualism were not included in current policies but were being addressed in draft policies. The workplace accommodations policy was implemented in October 2024.

**Many new hires not completing diversity and inclusion training**

HRM offers mandatory diversity and inclusion training for new employees, some business units also offer their own training. We found 38% of new employees tested had not completed either HRM or business-unit-specific training.

**Testing Results – New Employee Training**

<b>Business Unit</b>	<b>Yes</b>	<b>No</b>	<b>Total</b>
Halifax Regional Fire & Emergency	6	0	6
Halifax Regional Police	9	10	19
Halifax Transit	12	3	15
Human Resources	3	1	4
Parks & Recreation	0	4	4
Planning & Development	1	1	2
<b>Total</b>	<b>31</b>	<b>19</b>	<b>50</b>

The Office of D&I delivers diversity and inclusion overview training for all HRM employees. This course is mandatory to complete within six months of an employee’s start date. Additionally, Halifax Regional Police, Halifax Fire and Halifax Transit offer their own business-unit-specific diversity and inclusion training programs. Our testing shows further work is required to ensure new employees complete diversity and inclusion training.

- HRM diversity and inclusion overview training was delivered 29 times over the two-year audit period (April 2022 to March 2024). Office of D&I management told us it is delivered based on their capacity. Concerns were expressed during our audit on the availability of training.
- Just over half of the Halifax Regional Police new hires sampled did not complete training. While cadets receive D&I training in their recruitment program, HRP does not require civilian staff and experienced officers to complete diversity and inclusion training when they are hired.

It is important new employees complete diversity and inclusion training as it helps to ensure they are aware of their role and responsibilities to create and maintain a respectful, inclusive workplace.

### **Recommendation 1**

The Office of Diversity & Inclusion should review and assess the frequency of diversity and inclusion overview training to determine if it can support training all new hires. If not, plans to address the gaps should be developed and implemented.

#### ***Management Response***

*HRM accepts this recommendation. The Office of Diversity and Inclusion has been engaged with the Training Division in Human Resources to develop an on-line module we expect to be available in early 2025.*

### **Recommendation 2**

HRM should develop a process that helps ensure all new hires complete corporate or business-unit-specific mandatory diversity and inclusion training.

#### ***Management Response***

*HRM accepts this recommendation. The Office of Diversity and Inclusion will work with Human Resources to develop a plan and process to ensure all new hires participate in the mandatory training.*

## **Improvements Needed for Oversight and Prioritization of Work**

We found HRM lacks oversight of Diversity & Inclusion Framework implementation. While business units have implemented programs, actions and initiatives, it is not clear if the steps HRM have taken are adequate. Oversight is important to help ensure diversity and inclusion efforts across the organization are directed at achieving the goals in the framework.

Gaps in oversight include:

- No central responsibility to oversee and monitor framework implementation
- Lack of guidance to support development of framework implementation plans
  - Four of six business units did not have plans
- Ineffective monitoring process
  - Business units do not always complete quarterly update reports
  - Office of D&I does not review quarterly update reports
  - D&I Champions Table committee not regularly discussing plans and goals
- Annual framework reports provided to Regional Council are not sufficient
  - Lack clear updates on achieving goals, no performance measures
  - Multiple reports, no central update on progress
- No process to collect data to assess framework progress

### **No central oversight responsibility, corporate priorities not assessed**

Roles and responsibilities for central oversight and monitoring of Diversity & Inclusion Framework implementation are not clearly assigned.

The D&I Framework does not assign oversight and monitoring to a central role or business area within HRM. The roles and responsibilities section states diversity and inclusion is everyone's responsibility and collectively different levels play various roles in supporting, implementing and evaluating the framework. While we agree with this in concept, we also expected there would be oversight responsibilities established to ensure there is alignment across the organization in achieving the corporate diversity and inclusion goals.

With a lack of central oversight, there is no assessment of diversity and inclusion efforts to determine if HRM is committing the right resources to the right programs. Earlier in this report we outlined various programs and initiatives being implemented. While we can see efforts being taken by each business unit, overall, it is not clear if there is adequate work being completed under each framework goal to ensure they will be achieved. While we recognize business units have responsibility to identify and implement diversity and inclusion actions, we expected there would be central oversight of the relevant framework strategies and plans to assess if corporate goals are being achieved, identify gaps, and prioritize resources appropriately.

#### **Recommendation 3**

HRM should assign responsibility to oversee and monitor corporate implementation of the Diversity & Inclusion Framework.

#### **Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion will identify a system to oversee and monitor corporate implementation.*

#### **Recommendation 4**

HRM should implement a process to periodically assess ongoing work across the municipality under each framework goal and use this information to help manage and prioritize work accordingly.

#### **Management Response**

*HRM accepts this recommendation. Diversity and Inclusion Advisors will play an active part in the assessment process of the corporate monitoring of the D&I framework.*

**Lack of guidance to help business units develop framework implementation plans**

There was a lack of guidance provided to business units to support development of diversity and inclusion implementation plans. Office of D&I management told us they developed a template, but it was not provided to business units. Management confirmed there were no additional procedures or guidance provided. We expected there would be guidance to support how business units should develop implementation plans. For example, within existing business planning processes, or through a separate strategy or plan.

Of the six business units we assessed, four did not have diversity and inclusion implementation plans and it was not always clear what they planned to complete. These business units told us their initiatives are documented in various places, including their annual business plans and annual D&I Framework reports. We reviewed these documents but found it was difficult to determine what each business unit planned to achieve. The information in the business plans is not clearly linked to the framework, and the actions reported in the annual reports often lacked clear objectives and timelines.

Two business units had plans – Halifax Regional Fire & Emergency and Planning & Development. Halifax Fire developed a strategic plan and action plan that aligns with the framework, it includes roles and responsibilities and timelines. Planning & Development documented their actions aligned with three of the framework goals, but their plan did not have defined roles and responsibilities or timelines. Both business units have an embedded D&I Advisor who supported them with developing their plans.

The lack of plans makes it difficult to assess if corporate diversity and inclusion goals are being achieved. Having a clear understanding of what efforts are underway across HRM will help to allow effective oversight and monitoring of framework implementation.

**D&I Framework –  
Implementation Plan**

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“The Framework comes to life through implementation and evaluation plans created by individual business units and divisions.

The Framework is a roadmap designed to assist business units in actioning diversity and inclusion initiatives. It contains goals and best practices that can be incorporated into your business planning and customized to meet your business unit needs.”

*(Source: HRM’s Diversity & Inclusion Framework)*

### Recommendation 5

HRM should define expectations for how business units document their diversity and inclusion actions and initiatives, including how they align with the corporate framework goals, and provide guidance to business units on implementation.

#### Management Response

*HRM accepts this recommendation. As part of the 25/26 business plan, Business Units will be asked to describe their planned activities to advance D&I within their Business Units in alignment with the framework. Moving forward, Diversity and Inclusion Advisors will work with Business Units to develop goals and objectives as part of this process.*

### Framework implementation not effectively monitored

HRM is not effectively monitoring Diversity & Inclusion Framework implementation. As previously mentioned, there is no role assigned to centrally monitor framework implementation. Office of D&I management said they lead D&I Champions Table committee meetings and business units were asked to provide quarterly framework updates. However, we identified concerns with these processes.

For the six business units we assessed, we obtained their quarterly reports for the audit period. One business unit, Halifax Fire, completed all eight quarterly reports, but there were reporting gaps for the remaining business units. We noted all six business units provided an annual update which is discussed later in the report.

#### Number of Quarterly D&I Update Reports Completed by Business Unit

Halifax Reg. Fire	Halifax Reg. Police	Halifax Transit	Human Resources	Parks & Recreation	Planning & Development
8	5	2	5	2	0



Additionally, the quarterly updates are not always meaningful or clear. The report template allows business units to document their goals, action items, and results. While the business units completed these sections, there was not always a consistent approach or a clear link to their plans and initiatives. Business units told us they were not provided guidance on the quarterly update report process. Some of the issues we noted while reviewing the reports include:

Issue Identified	Example from Reports	OAG Concern
No clear objective - action is specific	“...Career Fair – displayed and featured current vacancies”	Specific action, not clear if part of broader objective
No clear objective - action is broad	“2023 Recruitment”	Not clear what actions the business unit is taking, or what they intend to achieve besides recruiting
No documented timelines for actions	“Collect feedback from residents on engagement program format.”	Not clear if this is ongoing or a one-time action, or when it is expected to be complete
Results are not clearly tied to actions	<p>Business unit listed four actions, but reported three results</p> <p>Business unit reported results, but there was no corresponding action</p>	Difficult to assess if business units completed what they intended to, and difficult to compare what has been achieved since the prior report
Results do not include performance measures	“...continue to take measures in increasing the diversity of our workforce by participating in hiring events to attract candidates from underrepresented groups.”	Not all actions have measured results, but we expected there to be performance results for measurable actions

While Office of D&I management said they told business units to submit quarterly reports, we found they do not review them. Office of D&I Advisors are assigned to support business units with actioning the D&I Framework. Advisors told us they have regular check-ins with their business units to see if they need support or guidance, but do not review the quarterly reports. Management told us the purpose of the quarterly reports was to support business units with their monitoring responsibilities.

### Recommendation 6

HRM should determine what level of reporting is required to monitor Diversity & Inclusion Framework implementation and provide business units with guidance on what information is required to support this process.

#### **Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion will identify mechanism(s) to support Business Units to be able to better report on all D&I strategies.*

In addition to providing quarterly reports, business units assign a member to attend D&I Champions Table meetings where they are responsible to participate and communicate on diversity and inclusion efforts. We reviewed the Champions Table meeting minutes for the audit period and found:

- The group met seven times.
- There were regular discussions on municipal-wide diversity and inclusion initiatives, including African Heritage Month, Ramadan, and the draft multilingual policy.
- Few discussions related to business unit plans, framework goals, and reporting.

While diversity and inclusion topics were discussed, we expected the committee would also regularly discuss goals and business-unit-specific actions to support framework implementation.

#### **D&I Champions Table**

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A committee that aims to monitor and ensure the implementation of the Diversity and Inclusion Framework's mission, values and objectives. Comprised of Office of D&I members and appointed business unit members, members will:

- Participate in development of action plans and initiatives
- Monitor and ensure implementation of their business unit's action plans
- Communicate on diversity and inclusion strategies and initiatives in their business units

*(Source: Diversity and Inclusion Champions Table – Terms of Reference)*

### **Annual reports not always meaningful, lack performance measures**

HRM provides annual reports to Regional Council on the Diversity & Inclusion Framework and Office of D&I strategies. However, improvements are needed to ensure there is a clear update on HRM's progress in implementing the framework.

There are several updates provided to Regional Council annually, but they lack a clear update on HRM's progress towards its corporate diversity and inclusion goals. There is an annual Diversity & Inclusion Framework report which provides an update on each

business unit's achievements. There are also individual annual reports on the status of the diversity and inclusion strategies (Accessibility, French-language Services, Immigration, Indigenous History Task Force). While this provides several updates on diversity and inclusion work across HRM, it makes it difficult to assess overall progress and performance towards achieving the framework goals.

The Diversity & Inclusion Framework annual reports do not provide a clear or consistent update on whether HRM is achieving the goals in the framework. We reviewed the 2019-20 to 2022-23 annual reports and found they are extensive, the 2022-23 report was 115 pages, but lack clear updates on the status of completed and planned work to assess progress. While business units provided updates that align with the corporate diversity and inclusion goals, we noted the following issues:

- Business unit updates lacked clear objectives and timelines.
- Graphs highlight the number of action items and results reported by business units under each goal but do not cover the relevance or impact of the items.
- There are no performance measures to help assess the effectiveness of the work underway.

We also reviewed the annual reports for the Office of D&I strategies and found most reports provide an update on the status of the actions (e.g. complete, in progress, not started); the Immigration Strategy updates were broad and not clearly linked to the action items. Additionally, most reports did not include performance measures and results. The 2024 Accessibility Strategy annual report included key performance indicators.

In addition, we noted some business units are responsible to implement action items in the Office of D&I strategies. They would also be responsible for providing status updates for the annual reports. This is in addition to their responsibility to provide business unit quarterly and annual updates under the D&I Framework. This may not be efficient and could lead to inconsistencies and duplication of work.

### **Recommendation 7**

HRM should identify if there are opportunities to streamline annual reporting (number of reports, quality and quantity of information) on progress and performance towards the corporate Diversity & Inclusion Framework goals and provide business units with guidance on how to report on their diversity and inclusion efforts.

### **Management Response**

*HRM accepts this recommendation. Office of Diversity and Inclusion will review the existing annual reporting requirements and provide business units with updated reporting guidelines.*

### **No process to collect data to help assess D&I Framework progress**

HRM does not have a process to collect relevant data and information to assess framework implementation. As previously mentioned, the business unit annual and quarterly framework reports do not include performance measures, and the information included is not always sufficient to assess if corporate goals are being achieved. Outside of these processes, the CAO told us that in addition to the framework reports, she reviews the annual workforce report and employee engagement survey results to get insight into HRM's performance. While this is reasonable, we expected there would be a formal process to collect relevant data related to the framework actions to help inform and evolve future updates to the framework.

One of the framework's corporate responsibilities is to "revisit and evolve the Framework to reflect business-unit experience". The Diversity & Inclusion Framework was introduced in 2018. Office of D&I management told us they have no formal plans on when they will revisit the framework, but they would like to update it in 2025.

#### **Recommendation 8**

HRM should determine what data is necessary to assess Diversity & Inclusion Framework progress and implement a process to regularly collect this data. This information should be collected and maintained by those responsible for oversight of the Diversity & Inclusion Framework.

#### **Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion commits to identifying KPI's that will measure the success and impact of the D&I Framework.*

## Background

HRM's Diversity & Inclusion Framework was established in 2018. The framework identifies key priorities and corporate goals pertaining to diversity and inclusion. Per the framework:

- *“Diversity is a combination of differences and similarities among people. It is more than race, ability, sexual orientation, language, gender, or any other descriptive category. Diversity means understanding and utilizing different views, ideas, life experiences, skills, and knowledge.”*
- *“Inclusion is community actions meant to eliminate barriers so all its members can fully participate in and contribute to the community. It means being supported and valued within the community and organization.”*

The Office of Diversity & Inclusion is a service area within the Chief Administrative Officer's (CAO) business unit. Per the Diversity & Inclusion Framework, *“the role of the Office is to provide advice and support both internally and externally in relation to diversity and inclusion as it impacts municipal services and programs.”* Per HRM's 2023-24 business plan, *“upon request, staff in the Office provide advice to business units to support their diversity and inclusion initiatives”*. Office of D&I responsibilities include:

- Implementing the D&I Framework and advise on D&I initiatives
- Leading corporate diversity and inclusion training
- Providing oversight and support for accessibility initiatives
- Engaging with the Indigenous community to support ongoing partnerships
- Supporting immigrant and migrant integration
- Establishing French language services and relationships with Francophone Communities
- Leading efforts to improve services for residents of African descent and African Nova Scotian communities

The Diversity & Inclusion Framework states HRM business units are responsible for establishing their own D&I goals, integrating diversity and inclusion into their operations, and providing an annual update on diversity and inclusion goals to the Office of D&I.

## About the Audit

We completed a performance audit of Diversity and Inclusion. The purpose of the audit was to determine if HRM demonstrates a commitment to diversity and inclusion in their everyday operations. Our role is to express an independent audit opinion of this area.

The objectives of the audit were to:

- determine if HRM business units have taken adequate steps to advance diversity and inclusion in everyday operations.
- assess whether HRM effectively monitors and reports on the implementation of the Diversity and Inclusion Framework.
- assess whether the Office of Diversity and Inclusion supports business units with diversity and inclusion initiatives.

Our audit focused on diversity and inclusion activities in seven business units: CAO's Office – Office of Diversity & Inclusion, Halifax Regional Fire & Emergency, Halifax Regional Police, Halifax Transit, Human Resources, Parks & Recreation, and Planning & Development. Our testing of diversity and inclusion strategies and actions was mostly limited to work aligned with HRM's Diversity & Inclusion Framework. HRM business units are responsible to implement additional strategies and plans (e.g. African Nova Scotian Road to Economic Prosperity action plan, Halifax Street Checks Wortley Report implementation, Culture & Heritage Priorities Plan) that also contribute to diversity and inclusion efforts. While we recognize their importance in advancing diversity and inclusion at HRM, they were not included in our audit testing.

We developed the criteria for this audit. These were discussed with, and accepted as appropriate by, management in the CAO's Office.

1. Plans to achieve the goals in the Diversity and Inclusion Framework should be developed and implemented.
2. Policies, training programs, and resources to promote and support a diverse, inclusive workforce should be developed and communicated to employees.
3. Programs and initiatives that support inclusive service delivery should be developed and implemented.
4. All new municipal employees should complete diversity and inclusion training
5. Diversity and Inclusion Framework implementation should be monitored, and gaps addressed.
6. Reports should be regularly provided to key personnel to assess if Diversity and Inclusion Framework goals are achieved.
7. Relevant data and information should be identified and collected to inform and evolve the Diversity and Inclusion Framework.
8. Office of Diversity and Inclusion should support business units with the development and implementation of diversity and inclusion plans.
9. Office of Diversity and Inclusion should advise business units with the development of relevant programs and policies.

Our audit period was April 1, 2022 – March 31, 2024. Information outside the audit period was considered as necessary.

Our audit approach included: interviews with management and key personnel, examination of Diversity and Inclusion Framework plans and reports; and review of applicable internal policies, procedures, and programs.

This audit was conducted in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001 Direct Engagements published by the Chartered Professional Accountants of Canada.

We apply CPA Canada's Canadian Standard on Quality Management 1. Our staff comply with the independence and ethical requirements of the Chartered Professional Accountants of Nova Scotia Code of Conduct.



## Appendix 1 – Recommendations and Management Responses

### **Recommendation 1**

The Office of Diversity & Inclusion should review and assess the frequency of diversity and inclusion overview training to determine if it can support training all new hires. If not, plans to address the gaps should be developed and implemented.

### **Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion has been engaged with the Training Division in Human Resources to develop an on-line module we expect to be available in early 2025.*

### **Recommendation 2**

HRM should develop a process that helps ensure all new hires complete corporate or business-unit-specific mandatory diversity and inclusion training.

### **Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion will work with Human Resources to develop a plan and process to ensure all new hires participate in the mandatory training.*

### **Recommendation 3**

HRM should assign responsibility to oversee and monitor corporate implementation of the Diversity & Inclusion Framework.

### **Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion will identify a system to oversee and monitor corporate implementation.*

#### **Recommendation 4**

HRM should implement a process to periodically assess ongoing work across the municipality under each framework goal and use this information to help manage and prioritize work accordingly.

#### **Management Response**

*HRM accepts this recommendation. Diversity and Inclusion Advisors will play an active part in the assessment process of the corporate monitoring of the D&I framework.*

#### **Recommendation 5**

HRM should define expectations for how business units document their diversity and inclusion actions and initiatives, including how they align with the corporate framework goals, and provide guidance to business units on implementation.

#### **Management Response**

*HRM accepts this recommendation. As part of the 25/26 business plan, Business Units will be asked to describe their planned activities to advance D&I within their Business Units in alignment with the framework. Moving forward, Diversity and Inclusion Advisors will work with Business Units to develop goals and objectives as part of this process.*

#### **Recommendation 6**

HRM should determine what level of reporting is required to monitor Diversity & Inclusion Framework implementation and provide business units with guidance on what information is required to support this process.

#### **Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion will identify mechanism(s) to support Business Units to be able to better report on all D&I strategies.*

#### **Recommendation 7**

HRM should identify if there are opportunities to streamline annual reporting (number of reports, quality and quantity of information) on progress and performance towards the corporate Diversity & Inclusion Framework goals and provide business units with guidance on how to report on their diversity and inclusion efforts.

**Management Response**

*HRM accepts this recommendation. Office of Diversity and Inclusion will review the existing annual reporting requirements and provide business units with updated reporting guidelines.*

**Recommendation 8**

HRM should determine what data is necessary to assess Diversity & Inclusion Framework progress and implement a process to regularly collect this data. This information should be collected and maintained by those responsible for oversight of the Diversity & Inclusion Framework.

**Management Response**

*HRM accepts this recommendation. The Office of Diversity and Inclusion commits to identifying KPI's that will measure the success and impact of the D&I Framework.*

## Appendix 2 – Office of Diversity & Inclusion: Audit Samples & Results

Accessibility Strategy – Sampled Actions	Testing Results
Implement Mobile Data Computer Software, online booking, and automatic fare systems to improve Access-A-Bus booking service	In Progress
Develop a passenger survey regarding accessible services to measure success	Not Started
Collect and maintain information from employment equity reports which indicates the number of individuals employed by the municipality who self-identify as having a disability	In Progress
Establish hiring procedures which requires defining accommodations for individuals with disabilities on job postings within the municipality, including accommodations available through the interview process (e.g., if a scribe is needed, etc.)	In Progress
Compile internal list of accommodations provided to employees with disabilities (e.g., visual, physical, neurodevelopmental, etc.)	In Progress
Develop a Workplace Accommodation Policy which outlines a formal process for providing accommodations to job candidates and employees with disabilities.	Complete
Establish partnerships with external partners (e.g., universities and colleges) to provide municipal work placements and internships that are available for students with disabilities	In Progress
Review current hiring practices and ensure that they are providing employment to individuals with disabilities	In Progress
Develop a procedure to share municipal job postings with agencies who support individuals with disabilities seeking employment	In Progress
Establish partnership between the accessibility advisor and business units to conduct annual business unit accessibility reviews	In Progress
Make the municipal internet and intranet websites and web content conform to the Web Content Accessibility Guidelines (WCAG) 2.1 format (Minimum Level AA- including job postings on Brass Ring and GIS mapping)	In Progress
Update accessibility page on Halifax.ca to provide information on accessibility in the municipality	Complete - Ongoing

French-Language Services Strategy – Sampled Actions	Testing Results
Develop an orientation package on French-language service resources to share with business units, including trainings, workshops and translation services.	Complete
Provide French-language training to municipal staff.	Complete - Ongoing
Develop supporting tools to ensure effective French-language training, including training evaluations, French language assessment tools, participants progress tracking systems and specialised and customised trainings.	Complete - Ongoing
Provide cultural awareness workshops on Acadian and Francophone community to municipal staff.	Complete - Ongoing
Develop resources, materials (e.g.: cheat-sheet of French one-liners, bilingual business card template, bilingual voice message template), and on-the-job activities to promote bilingualism at work.	Complete
Ensure municipal representation at job fairs and community events of the Acadian and Francophone community to promote job opportunities.	Complete - Ongoing
Support the work of the Halifax Acadian and Francophone Partnership.	Complete - Ongoing
Identify opportunities for business units to work with the Acadian and Francophone community organizations to improve municipal service delivery.	Complete - Ongoing
Evaluate the current French micro-site and explore ways to maximize its utility and increase its content.	Complete
Maintain the production and distribution of bilingual public service announcements and press releases and evaluate the usage; explore effective and efficient ways to communicate with the community. (e.g. bilingual titles for Public Service Announcement (PSA) hosted on the municipality’s website and French micro-site).	In Progress
Host regular events to provide municipal information to the Acadian and Francophone community.	Complete - Ongoing
Undertake regular community consultations with the Acadian and Francophone community.	Complete - Ongoing

Immigration Strategy – Sampled Actions	Testing Results
Conduct annual inventory and evaluation of municipal services geared towards immigrants and newcomers	Not Started
Hold staff awareness events (Diversity Cafés awareness sessions)	In Progress
Continue providing Diversity and Inclusion training modules	Complete - Ongoing
Staff at all levels of the organization participate in Diversity and Inclusion training	Complete - Ongoing
Diversity and Inclusion are highlighted within the organization through an internal communication plan	Complete
Collaborate with the Halifax Partnership and Immigrant Services Association of Nova Scotia (ISANS), to create publications celebrating immigrants and newcomers' communities and their impact on the Municipality's economic development	In Progress
Establish/ maintain partnerships with immigrant-serving organizations to help ensure the successful integration of immigrants	Complete - Ongoing
Identify opportunities for the Municipality to work with community partners to create an accessible, welcoming, and inclusive Municipality	Complete - Ongoing
Encourage initiatives aiming to enhance immigrant talents	In Progress
Update, maintain, and promote the immigrants' portal on Halifax.ca	Complete - Ongoing
Ensure the use of plain language in communication	In Progress
Translate and promote information on municipal services	In Progress
Provide entrepreneur immigrants with information on municipal regulatory requirements for start-up business	Not Started
Reduce regulatory barriers for immigrant businesses by creating a human-centred customer approach to navigating services	Not Started

Indigenous History (Task Force) – Sampled Actions	Testing Results
That the HRM, as the capital city of Nova Scotia, initiate a process (with full participation by representatives of the Mi'kmaw community) by which further outdoor spaces for the recognition and commemoration of Indigenous history can be identified and appropriate action taken, and that priority be given to memorializing survivors of the Shubenacadie Residential School and missing and murdered Indigenous women and girls.	In Progress
That the HRM explore the development of bonusing guidelines that will offer incentives for elements of any development that will demonstrably bring benefits to the Mi'kmaw community, through commemorative installations or in any other evident way, and that representatives of the Mi'kmaw community participate in assessment of proposals that apply for such an incentive.	Not Started
That where and when possible, the HRM look for and facilitate the holding of major Indigenous events that combine economic benefits with the opportunity to showcase Mi'kmaw history and culture.	Complete - Ongoing
That the Cornwallis statue be retained in storage pending the creation of a civic museum (see also recommendation 6), owned and operated by the HRM according to the highest professional museological standards, and that the statue then be transferred to the collection of the civic museum.	In Progress
That Cornwallis Park be renamed "Peace and Friendship Park."	Complete
That Cornwallis Street, subject to an expression of approval by the congregation of the New Horizons Baptist Church, be renamed "New Horizons Street."	Complete
That the Point Pleasant Park Mi'kmaq Heritage Area Interpretive Plan (June 2008) be made a priority for HRM action, and that the process of assembling funding proceed without delay.	Not Started
That the process leading to finalization of the art and commemoration components of the Cogswell Street Redevelopment Project be continued and supported, and that every opportunity be taken to involve Mi'kmaw artists and designers in all aspects of the process, including architectural design.	In Progress
That the diversity of new names for streets and other HRM assets be enhanced by working with the Mi'kmaw community to generate an expanded list of potential names.	Complete - Ongoing



Indigenous History (Task Force) – Sampled Actions	Testing Results
<p>That the HRM prioritize support of youth activities furthering the recognition and commemoration of Indigenous history, and that a small fund be created that can provide grants on an adjudicated basis to Indigenous or non-Indigenous recipients who propose activities that will bring benefits in this area.</p>	<p>Not Started</p>
<p>That the HRM continue to nurture its close and productive relationships with Mi'kmaw organizations that can assist with the effective recognition and commemoration of Indigenous history, including (though not limited to) Kwilmu'kw Maw-klusuaqn (the Mi'kmaq Rights Initiative), Mi'kmaw Kina'matnewey (the Mi'kmaw education authority), and the Mi'kmaw Native Friendship Centre.</p>	<p>Complete - Ongoing</p>

## Appendix 3 – Business Unit: Audit Samples & Results

Halifax Regional Fire & Emergency – Sampled Actions	Testing Results
Halifax Regional Fire & Emergency (HRFE) develops and uses at least two Diversity & Inclusion lens tools, resource or strategy related but not limited to: accessibility, immigration, Indigenous/Aboriginal people, anti-racism and anti-black racism, Acadian/Francophone communities, and Gender-Based Analysis Plus (GBA+) for creating an inclusive workplace and serving diverse communities each fiscal year.	Partially Implemented
HRFE reviews and creates policies, practices and the collective agreement on a regular basis and during every negotiation to ensure that D & I is supported and that systemic barriers are addressed, and actions are taken to remove them.	Implemented – Ongoing
HRFE gathers and implements feedback from members and staff from under-represented groups around improving workplace culture annually.	Partially Implemented
HRFE collects and analyzes recruitment data on an ongoing basis.	Implemented – Ongoing
HRFE identifies opportunities to work with internal and external partners to create an accessible, welcoming and inclusive municipality.	Implemented – Ongoing
HRFE has diversity and inclusion communications plan(s).	Partially Implemented

Halifax Regional Police – Sampled Actions	Testing Results
Included in the curriculum for this year's required training for Halifax Regional Police (HRP) Officers and employees is a presentation focused on the 2SLGTQIA+ Community. Training focuses on 2SLGTQIA+ issues, language, history of Canadian policing and the queer community and understanding nuances around biological sex, gender identity, and sexual orientation.	Implemented
The See Myself project - "The See Myself project aims to highlight the organization's diverse workforce while also allowing employees from diverse background to see themselves displayed and celebrated within the workplace. This project was conceived by employees with diverse backgrounds who felt underrepresented by the photographs displayed within the buildings. The Office of the Chief has championed the project which has been carried out by the Diversity and Inclusion unit.	Implemented

Halifax Regional Police – Sampled Actions	Testing Results
Francophone Officer Role/French Strategy - The role of the Francophone Officers is currently being reviewed by HRP with the intention to expand and shape a French strategy to build on in the future. We will be engaged with HRM Diversity and Inclusion Office on this.	Not Complete
With recruitment for the 2023 HRP Police Sciences Cadet Program currently ongoing, HRP has partners with a number of key community organizations and groups with the goal to encourage candidates from diverse communities to apply for the program.	Implemented
Hate Crime Unit Consultations - In January 2022, HRP established a Hate Crime Unit. Recently, the Corporate Affairs Division, including the Diversity Office, began the process of a series of community consultations. These consultations aim to connect with communities most targeted by hate, seek to increase the information flow between HRP and victims of hate crimes and affected communities, and thereby build on service delivery in the response to hate crimes and incidents.	Implemented

Halifax Transit – Sampled Actions	Testing Results
Awareness and support for Indigenous peoples impacted by residential school system.	Implemented
Examine and implement ways to make transit more accessible for all.	Implemented
Promote key principles and expectations of our passengers with focus on the values of Safety, Courtesy, and Respect.	Implemented
Diversify our workforce to accurately represent HRM's population.	Implemented
Engage with community organizations.	Implemented
Develop informational materials in multiple languages.	Partially Implemented

Human Resources – Sampled Actions	Testing Results
Employment Equity Program	In Progress (Long-term Objective)
Build career development programs and tools to support employment equity candidates being successful in achieving leadership positions and promote equitable access to such career development opportunities.	Implemented
Promote HRM employment opportunities through engagement with community-based organizations who support employment equity groups.	Implemented

Parks & Recreation – Sampled Actions	Testing Results
Senior Services Plan	In Progress (Long-term Objective)
Attract and retain a skilled workforce that reflects the diverse residents of the municipality	Not Complete
Connect with underrepresented groups to ensure greater access to recreation opportunities	Implemented

Planning & Development – Sampled Actions	Testing Results
Correct spellings on HRM signs – especially for Indigenous names (use of apostrophes).	Partially Implemented
Set a standard engagement approach that includes a variety of ways to participate in the planning process and provide feedback.	Implemented
Establish Planning & Development Diversity & Inclusion Champions Table.	Not Complete
Created and Hired Nova Scotia African Heritage Intern position.	Implemented
Work with Human Resources to better advertise job postings and attract talent from diverse group	Not Complete
Worked on completing the public consultation on Culture and Heritage Priorities Plan (CHPP) with various underrepresented groups and Internal staff (Office of Diversity & Inclusion and Parks & Recreation).	Implemented
Putting more data on the website as Open Data.	Implemented
Develop interactive map to assist partner agencies in assessing future facility needs in support of growth and community development.	Implemented

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