

Bill 166 Annual Report

Office of Diversity, Equity and Sustainability Initiatives

Reporting year: January 1, 2025 to December 31, 2025

Mandate

The Office of Diversity, Equity and Sustainability Initiatives (ODESI) is an institutional leader in advancing OCAD University's (OCAD U's) commitment to supporting and promoting accessible, equitable and inclusive work and learning environment that are barrier free and free from harassment, discrimination and bullying under OCAD U's *Respectful Work and Learning Environment Policy* (RWLEP), and its obligations pursuant to the *Accessibility for Ontarians with Disabilities Act* (AODA), the *Ontario Human Rights Code* (Code), *Occupational Health and Safety Act* (OHSA) and related jurisprudence and policies.

ODESI has a broad 5-prong mandate to support OCAD U to advance equity and human rights in all aspects of its operations and organizational culture. The Office provides:

- Strategic advice in support of equity-based organizational change;
- Advocacy for high human rights standards in policies, procedures, and practices;
- Organizational development that includes customized training, educational resources, and programming;
- Data-driven change initiatives, such as OCAD U's Employment Equity Program; and
- Human Rights Complaint Resolution through the administration of the RWLEP.

The primary responsibility of ODESI is to administer the RWLEP and the established informal and formal complaints processes. To build a more respectful and inclusive campus, ODESI offers the following services:

- Confidential intake, support and guidance to all students, staff and faculty in respect of a concern or complaint of discrimination, harassment or bullying;
- Consultations, advice and assistance for all Senior Administrators, including academic leaders, on addressing human rights concerns, complaints and potential RWLEP violations;
- Facilitate early informal dispute resolution processes, such as clarification of the issues, facilitated conversations, workplace coaching, training, workplace restoration and mediation;
- Fair and effective administration of OCAD U's human rights policies and processes by providing subject matter expertise on the principles of human

rights, equity and accessibility and related obligations at all stages of the resolution of RWLEP complaints.

Tri-Policy Review

In 2022, OCAD U conducted a consultation and review process to harmonize the *Non-Academic Misconduct Policy*, the *Response to Violent or Threatening Behaviour Policy* and the RWLEP.

Bill 166-related Activities

In May 2024, the Province passed Bill 166 - *Strengthening Accountability and Student Supports Act*. This legislation amended the *Ministry of Training, Colleges and Universities Act* requiring publicly-assisted colleges and universities to have a student mental health policy and policies to address and combat racism and hate, including but not limited to anti-Indigenous racism, anti-Black racism, antisemitism and Islamophobia.

On September 9, 2024, the Ministry of Colleges and Universities issued a Directive guiding colleges and universities as to what information should be included and published with respect to the institution's anti-hate and anti-racism policies, setting out internal review expectations and prescribing reporting standards.

Below are details regarding the initiatives that were implemented by ODES to meet Bill 166 and to strengthen ODES's capacity to monitor its cases and evaluate the efficacy of human rights programming across campus.

RWLEP Policy Update

Pursuant to Bill 166, ODES identified amendments to align with the Minister's Anti-Racism/Anti-Hate Directive. In 2024-2025, the RWLEP was updated to meet the new requirements under Bill 166, including confirming that the University will not tolerate racism and hate; the policy applies to visitors, including guest speakers; that concerns can be raised anonymously; and nothing in the policy prevents participants from filing a complaint with the Ontario Ombudsman. The next full review date for the RWLEP is November 9, 2027.

Centralized Platform and Complaints Process

In 2025, ODES, in collaboration with institutional partners, developed the centralized platform [Responding to Hate and Racism](#) for the campus community. Accompanying the centralized platform, ODES launched the new [Raise your Concern or Complaint](#) webpage, which hyperlinks to the [online intake form](#). Together, these initiatives aim to increase awareness of, and easier access to, university policies, processes, resources and supports for community members who have experienced or witnessed instances of racism, hate, discrimination, harassment or bullying at OCAD U.

Intake Process

ODES launched a standardized intake process for responding to consultations, concerns and complaints from all members of the OCAD U community. Members are now required to fill out and submit the standardized [online intake form](#) to enable ODES

to proceed with an assessment of the concerns, provide support referrals, and to explore resolution options. The introduction of a standardized intake methodology and specific data fields strengthens ODESI's analytical capacity by facilitating more nuanced assessment of the social areas and protected grounds of the concerns being raised with ODESI.

Anonymous Complaints

Pursuant to Bill 166, the new intake form includes an anonymous submission option, allowing OCAD U community members to submit concerns anonymously or on behalf of another individual. All anonymous submissions are reviewed and the information provided contribute to OCAD U's broader efforts to monitor trends, identify systemic issues, and foster a respectful and safe learning and work environment. The option of filing an anonymous intake clearly indicates that ODESI will be significantly limited in its ability to assess or respond to anonymous concerns that lack sufficient identifying information.

OCAD U's RWLEP Activity Data

This Annual Report covers RWLEP-related data collected from January 1, 2025 to December 31, 2025.¹ In keeping with RWLEP and legislative requirements, the data will be shared in aggregate to protect the privacy of participants. This data does not include anti-hate and anti-racism concerns handled by other OCAD U administrative offices.

Chart 1: Number of Consultations & Complaints in 2025

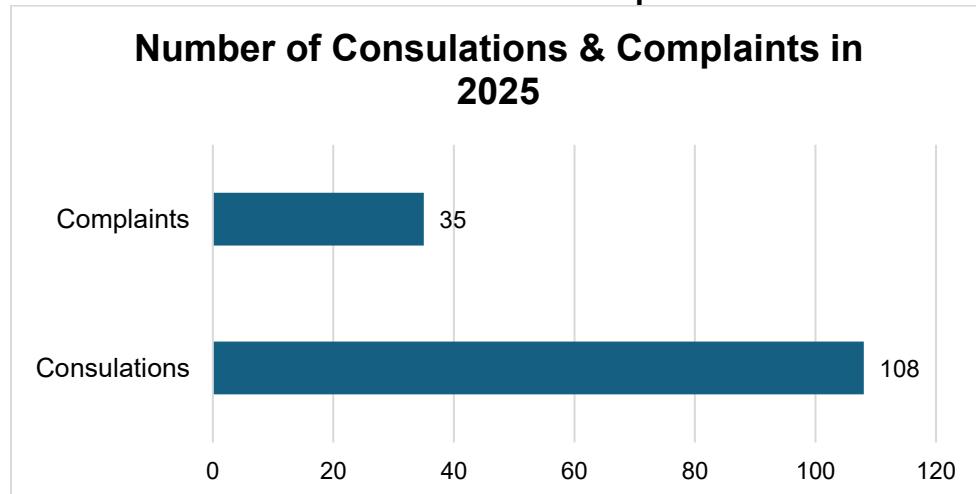


Chart 1 provides the total number of consultations and complaints that were handled by ODESI in 2025. There were 108 consultations and a total of 35 informal and formal complaints.

¹ The past limitations to ODESI's case-management and record-keeping constrains the office's ability to report on cases, outcomes, services and trends against a historical analysis. To that end, ODESI provides the below summary overview of complaint activity with the caveat that the data accuracy cannot be fully validated.

****All data referenced below is related to the 35 complaints submitted to ODESI in 2025.**

Chart 2: Complainant Status

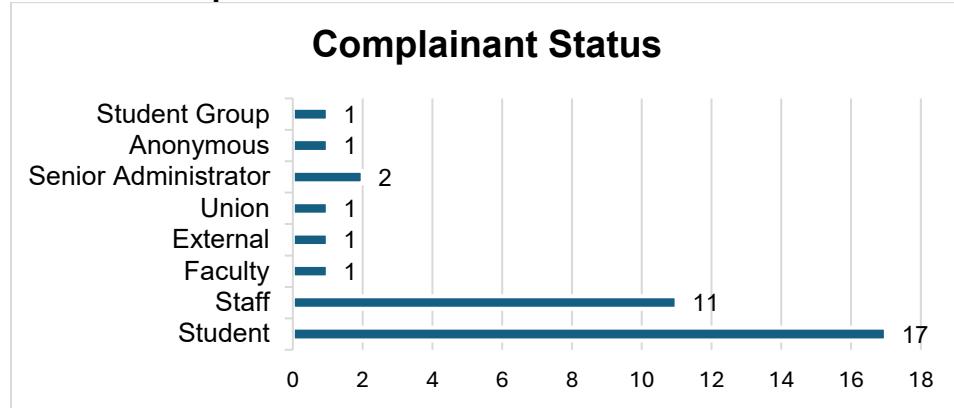


Chart 2 identifies the nature of the complainant's status with OCAD U. The data demonstrates that the majority of the 35 complaints submitted to ODESI in 2025 originated from staff and students.

Chart 3: Respondent Status

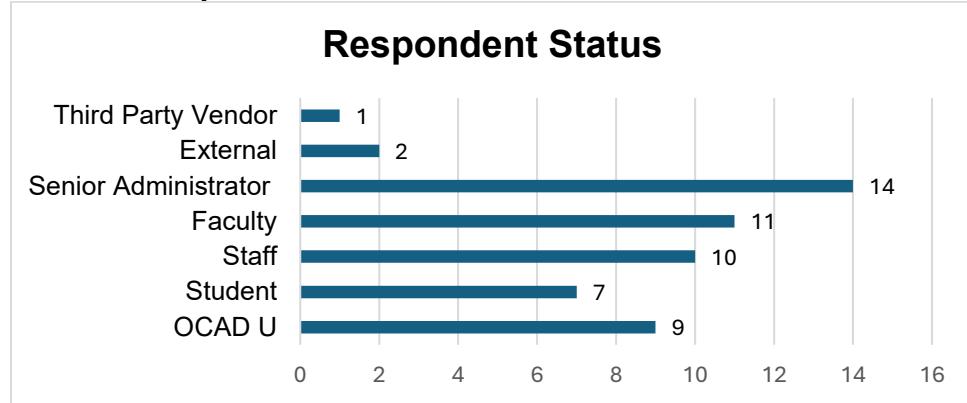


Chart 3 identifies the nature of the respondent's status with OCAD U.² A single complaint may name more than one respondent. The data demonstrates that the majority of the 35 complaints submitted to ODESI in 2025 related to the impugned behaviour of a diverse range of individuals and the University as a whole.

² Section 83 of the RWLEP defines "Senior Administrators" as including Senior Administrators, Deans, Associate Deans, Directors, Managers, Program Chairs, and Supervisors.

Chart 4: Grounds Cited in Complaints

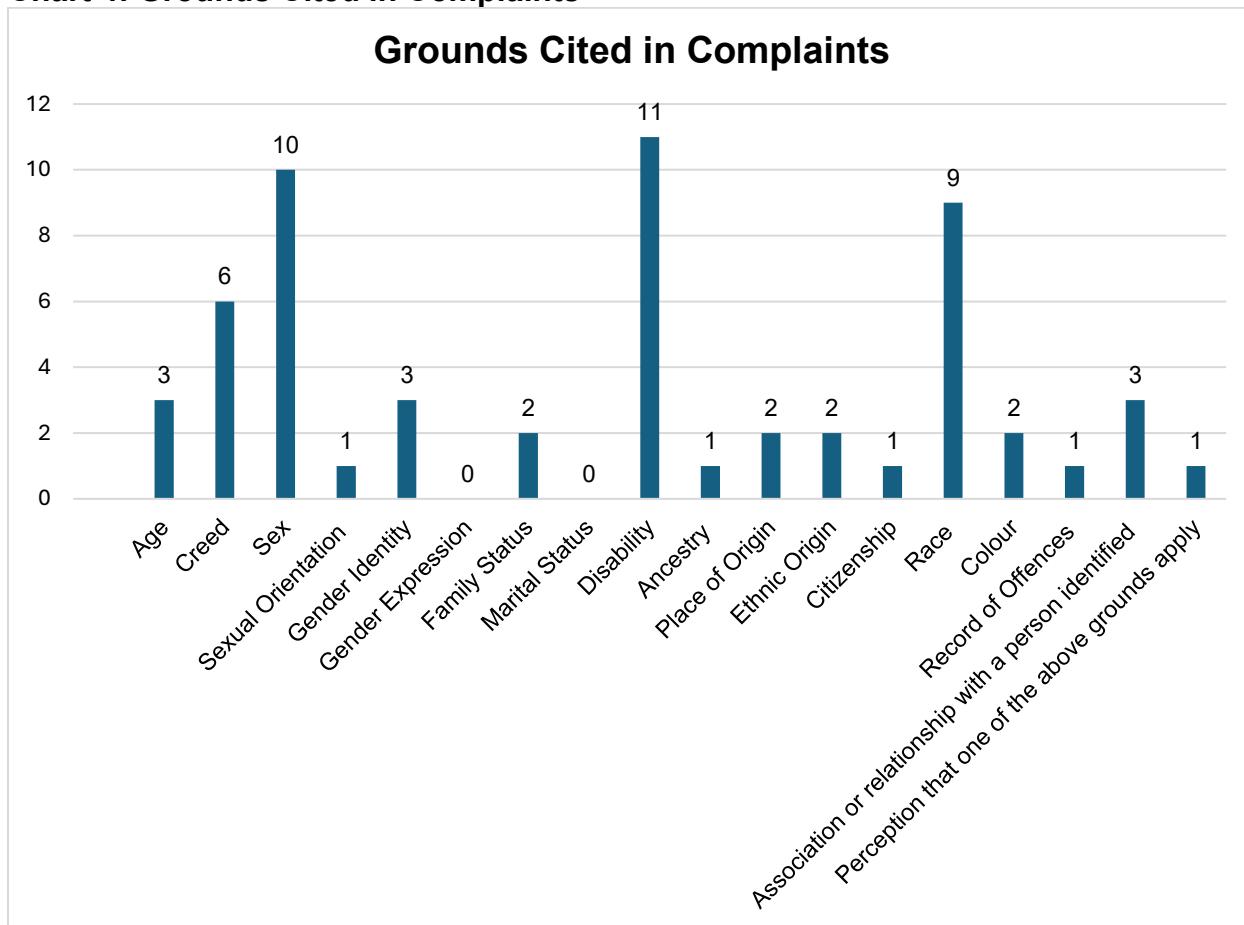


Chart 4 reflects the prohibited grounds cited by complainants in their complaints. A single complaint may identify multiple grounds.

This data demonstrates the leading grounds cited in the 35 complaints submitted to ODESI in 2025 were disability, sex and race. During this reporting period, the associated subcategories included two anti-Black racism complaints, two antisemitism complaints, one anti-Indigenous complaint and one complaint of Islamophobia.

Chart 5: Complaint Type

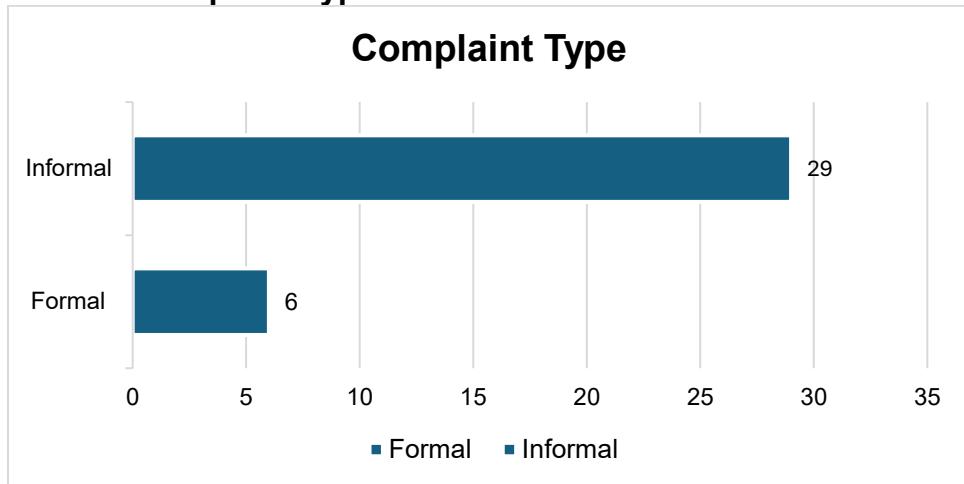


Chart 5 reflects whether the complaint submitted to ODESI proceeded as an informal complaint or a formal complaint.

An informal complaint is a matter where the complainant sought ODESI's intervention to facilitate a solution and the matter is addressed at this level without resort to the RWLEP decision-maker.

A formal complaint process is initiated when a resolution was not achieved through informal means and/or the complainant sought their concerns be addressed through a confidential investigation triggered by the RWLEP decision-maker.

This data demonstrates that the majority of the 35 complaints submitted to ODESI in 2025 were handled through an informal complaint process.

Chart 6: Category of Impugned Behaviour

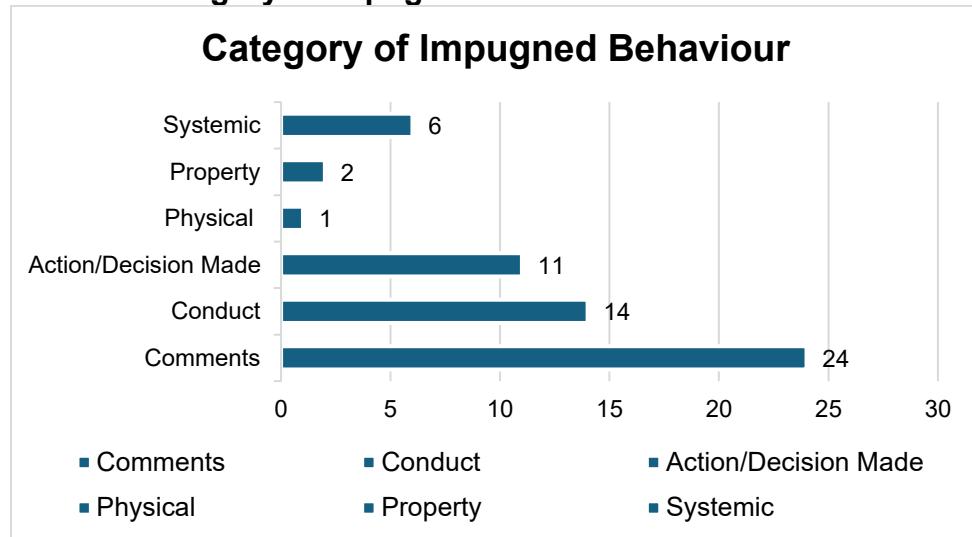


Chart 6 outlines the type of behaviour that is the subject of the complaint. A complaint can involve one or more of these categories of impugned behaviour: comment, conduct, decision-making, conduct in relation to property, physical acts and/or systemic/policy concerns.

Chart 7: Complaint Status

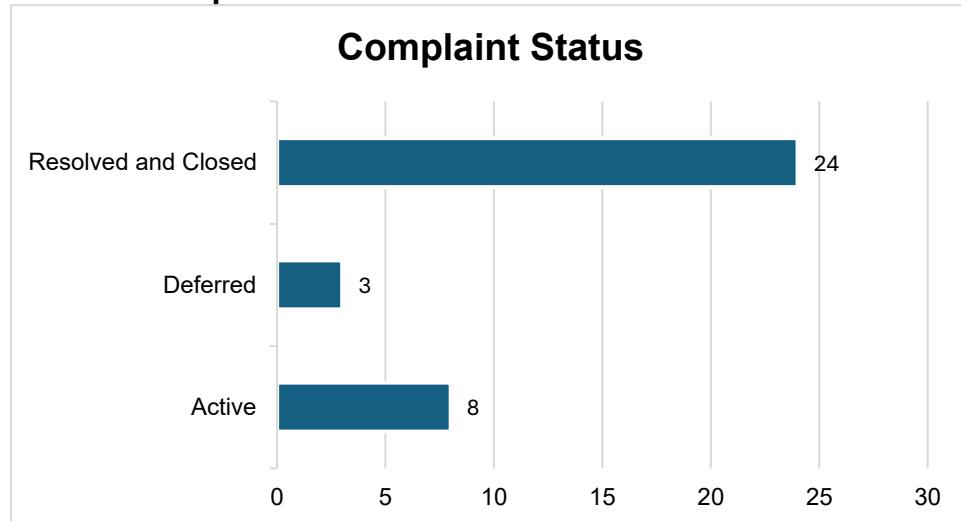


Chart 7 identifies the status of the 35 complaints submitted to ODESI in 2025. During this reporting period, 3 complaints were deferred based on alternate concurrent proceedings and 24 complaints were resolved, resulting in 27 closed complaints. 8 complaints remained active as of January 2026.

Chart 8: Resolution Type

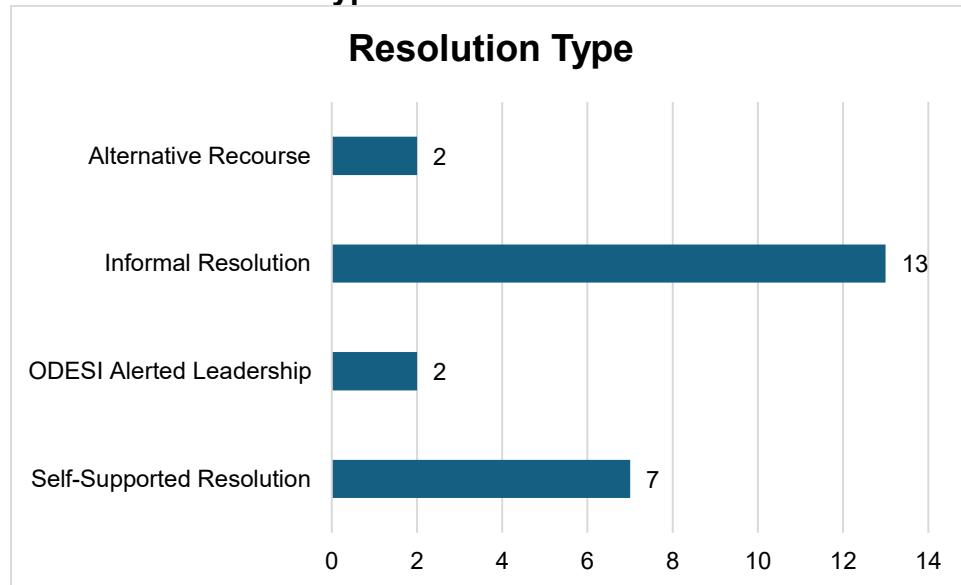


Chart 8 highlights the type of resolution achieved for the 24 complaints that were closed in 2025: 13 were informally resolved³, 7 were self-supported resolutions, 2 were deferred to alternative internal recourses and two were alerted to leadership. During this reporting period, there were no formal complaints that reached the disposition stage. As a result, there are no investigation findings or dispositions to report.

Timelines

Of the 27 complaints closed in 2025, it took an average of 1.87 months to close the file.

This report was reviewed by the Executive Team on January 20, 2026, and is scheduled to be reported to the People & Culture Committee of the Board of Governors on February 11, 2026.

³ An informal resolution option is facilitated by ODESI and can include: clarifying the issues, facilitated conversations, informal dispute resolution, workplace coaching, workplace restoration, or mediation, as defined in section 43 of the RWLEP. A self-supported resolution is where the complainant seeks ODESI's guidance and chooses to address the matter on their own.