

PEEL DISTRICT SCHOOL BOARD PROCEDURE

Hiring Practices Operating Procedure

PROCEDURE ID: [Enter text](#)

PARENT POLICY: Hiring Practices Policy 90

RESPONSIBILITY: Workforce Planning, Human Resources Partnerships & Equity

APPROVAL: Director's Council

APPROVAL DATE: [Click or tap here to enter text](#)

EFFECTIVE DATE: [Click or tap here to enter text](#)

PROJECTED REVIEW DATE: February 28, 2024

REVIEW SCHEDULE: 2 years

1. Purpose

The purpose of this procedure is to challenge the established hiring norms which have led to disproportionate outcomes, specifically for historically marginalized staff (Indigenous, Black, African, and Caribbean) and to co-construct practices, and accountabilities to dismantle such disproportionalities.

This document will disrupt and challenge the traditional concepts that have always been known as 'that's how it has always been done'. Various forms of data collection demonstrate that the Peel District School Board (PDSB)'s practices (past and current) have resulted in disproportionate outcomes and fallen short. To build and co-create fair and just practice(s), will require deep personal introspection and dismantling of stereotypes, prejudices (racial, social identities, religion, class, ableism, etc.) and incorporating intentionality of conscious action in hiring decision making, in order to achieve equitable outcomes. "*Such will come by spending our privilege, in other words, to use your power and privilege to change the perceived normality*". Organizations and the individuals that comprise them grow from discomfort.

The Ministry of Education also affirms the following, "...diversity in leadership and in enrolments for teacher training will increase fairness in the hiring and promotion of staff and educators by removing barriers for underrepresented communities. School leaders and educators will better reflect Ontario's diverse student population. Research shows

that when students see themselves reflected in their learning environment, they are more likely to feel a sense of belonging and well-being". This is important in ensuring that all students are provided with the best possible opportunities to be successful.

Without a thorough understanding of the past, individuals and organizations cannot think about moving towards a more fair, equitable, and transparent future. Any 'new' practice that does not recognize nor seek to actively address historic harms will only replicate or cause additional harm in its implementation.

An important goal of PDSB in creating the Hiring Practices Operating Procedure ('HPOP') is to be race conscious and celebrate race for the richness it brings to this organization and the community we serve. An additional goal is to recognize the interconnection of power and privilege, specifically white supremacy, and how it often operates in 'unseen' ways and influences our systems, our practices, and our actions.

The HPOP outlines the hiring processes and procedures that will create a fair, equitable and transparent hiring process/procedures that are actively anti-racist, anti-oppressive and accountable that apply to all staff. The HPOP will also support the implementation of the Ministry of Education's Policy/Program Memorandum (PPM) 165: School Board Teacher Hiring Practices, and result in a workforce that is reflective of the communities we serve so that we can inspire success, confidence and hope in each student.

2. Application and Scope:

Ministry Review

In March 2020, the Ministry of Education released its report on the review, which outlined observations and recommendations in several areas including systemic discrimination, specifically anti-Black racism, human resources practices, Board leadership and issues of governance.

In this report, the reviewers noted an absence of demographic diversity among school staff, and an underrepresentation of racialized teachers consistent with staff and student census data. Research has demonstrated that African, Caribbean and Black and Indigenous students achieve better educational outcomes and have better educational

experiences when they have educators who understand their lived identities and intersectional experiences. For example, research has shown both short-term and long-term effects, with Black students having Black teachers achieving higher end-of-year test scores compared to Black students with a non-Black teacher as well as Black elementary students being more likely to graduate high school and enroll in post-secondary education if they have one Black teacher.¹

As a result of the report, the Minister of Education established a series of Ministerial Directives that are intended to address the issues raised by the reviewers. These include establishing strong accountability practices, restore good governance, model equity-focused leadership, and establish human resource practices, including hiring practices, that are equitable and transparent.

PPM 165

In February 2021, the Ministry released Policy/Program Memorandum No. 165 (PPM 165) regarding "School Board Teacher Hiring Practices": PPM 165 provides direction to Ontario's publicly funded school boards in the development and implementation of teacher hiring policies by identifying the expected components within teacher hiring policies as well as effective practices to increase fairness, flexibility, mobility, merit, and quality in hiring of teachers. The introduction of PPM 165, along with the Ministry Review, provided an opportunity to develop hiring practices that extend to all employee groups within the PDSB.

About This Operating Procedure

The Hiring Practices Operating Procedure supports the Peel DSB Policy 90 – Hiring Practices, and was created to support hiring committees to utilize equitable approaches to select a candidate for a position incorporating anti-racist and anti-oppressive practices.

¹ "Black Teachers Improve Outcomes for Black Students". Lauren Camera. US News. Published November 23, 2018. <https://www.usnews.com/news/education-news/articles/2018-11-23/black-teachers-improve-outcomes-for-black-students>

The objective of the Hiring Procedure is to assist individual hiring managers (individuals who have hiring responsibilities) to:

1. Build a community of practice, action and accountability;
2. Recognize and mitigate various biases (unconscious and implicit biases);
3. Expand the applicant pool to ensure that candidates with diverse identities and lived experiences reflect those of the students and community;
4. Honour and value lived experiences of candidates, dismantling the traditional notion of meritocracy; and,
5. Create accountability, collect data, and document progress towards continuously improving the recruitment and selection process.

3. Definitions

- 3.1 The definitions included in this HPOP are in alignment with the Anti-Racism Policy (Policy XX) and the Human Rights policy (Policy 51).
- 3.2 **Ableism:** Discrimination and social prejudice against people with disabilities and/or people who are perceived to be disabled. It characterizes people who are defined by their disabilities and/or perceived to be disabled as inferior to non-disabled people. At its heart, ableism is rooted in the assumption that disabled people require 'fixing' and defines people by their disability.
- 3.3 **Accessibility:** Ensuring that people of all abilities have equitable and barrier-free access to physical spaces, products, programs and services, as well as employment opportunities.
- 3.4 **Accommodation:** Under the Ontario Human Rights Code, people identified by Code-protected grounds are entitled to the same opportunities and benefits as everyone else. In some cases, these people may need particular arrangements, or 'accommodations' to take part equally in the areas the Code covers. Employers have a legal obligation to accommodate Code-identified needs, unless they can prove it would cause undue hardship which is assessed on a variety of factors including cost, and health and safety.

- 3.5 **Ageism:** Stereotyping and/or discrimination against individuals or groups on the basis of their age. It is a socially constructed way of thinking about older people based on negative attitudes and assumptions about aging, and tendency to structure society based on the assumption that older people are inferior to younger people.
- 3.6 **Anti-Oppressive:** An approach that recognizes the power imbalance within society that attributes benefits to some groups and excludes others. This approach seeks to develop strategies to create an environment free from oppression, racism, and other forms of discrimination. It acknowledges the intersections of identities protected under the Code and aims to promote equity.
- 3.7 **Anti-Racism:** The proactive commitment to creating safe and inclusive spaces across society, especially public spaces, and to attaining race and educational equity. Race based data informs efforts to identify, disrupt and dismantle longstanding practices, procedures and behaviours that produce and sustain racialized outcomes and to achieve a reasonable and fair degree of parity.
- 3.8 **Bias:** A personal preference for or against an individual or group, whether conscious or unconscious. Bias can interfere with one's judgement and decision-making.
- 3.9 **Conscious Bias:** Refers to biased attitudes that individuals are aware, and can be expressed in words and actions. With conscious bias, the individual is very clear that their feelings and attitudes, and their behaviour is conducted with intent.
- 3.10 **Data and Correlation:** Data consists of facts, figures, and statistics objectively measured according to a standard or scale, such as frequency, volumes or occurrences, but does not include information. Correlation is a measure of which two data variables are related that is often used to show a mutual relationship or connection between those data variables.
- 3.11 **Disaggregated data:** The breakdown of data into smaller units for statistical analysis. In the context of race-equity data, this means breaking down the composite (aggregate) "racialized" category into its component parts such as

Black, South Asian, East/Southeast Asian, Latino, Middle Eastern, White, etc." This can help identify and understand the unique experiences of people with intersecting social identities (intersectionality), such as how Black females with disabilities experience racism differently in schools than those who are differently abled. Race equity data allows for the identification of the barriers faced by persons with intersectional identities. It aids in the development of disparity reduction plans.

- 3.12 **Discrimination:** Adverse differential treatment based on a protected ground of discrimination under the Code that results in harm in a protected social area. Code-based harassment is included in the definition of discrimination.
- 3.13 **Diversity:** The presence of a wide range of human qualities and attributes within a group, organization, or society. The dimensions of diversity include, but are not limited to, ancestry, culture, ethnicity, gender, gender identity, gender expression, language, physical and intellectual ability, race, religion, sex, sexual orientation, and socio-economic status. (PPM 119) Diversity can also include can also include differences such as personality, style, capabilities, and thought/perspectives. These experiences and identities shape who we are, how we think and how we engage with, and are perceived by the world.
- 3.14 **Duty to Accommodate:** Under the Code, people identified by protected Code grounds are entitled to the same opportunities and benefits as everybody else. In some cases, they may need special arrangements or "accommodations" to take part equally in social areas, such as employment, housing, and education.
- 3.15 **Equality:** under the Code is based on an understanding of substantive equality. The concept of equality does not necessarily mean identical treatment and, the formal 'like treatment' model of discrimination may in fact produce inequality.
- 3.16 **Equity:** 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. (PPM 119) Equity is making sure everyone has what they need to succeed and removing barriers that disadvantage some groups over

others. This is different than treating people equally, which is behind the concept of "equality."

3.17 **Inclusion and Safe Learning Cultures:** Inclusion and Safe Learning Cultures embraces diversity and promotes full acceptance of all persons regardless of racial identities and varied intersectionality. Human dignity and fulfillment of every individual's full potential is to be achieved through tutoring, nurturing, coaching, and mentoring of persons most impacted by systemic racism, especially during this period of change and transition towards race equity.

3.18 **Intersectionality:** The complex interactions between the multiple and overlapping identities and social locations that shape the lives of individuals and communities. In some cases, individuals may accrue compounded burdens of health harms and social disadvantage. Overlapping identities may include one's religion, ethnic origin, gender, sexuality, age, disabilities or citizenship and immigration status. An intersectional analysis enables better understanding of the impacts of distinct identities by considering how specific barriers may be interacting with each in cumulative ways.

3.19 **Inclusive Education:** Education that is based on the principles of acceptance and inclusion of all students. Students see themselves reflected in their curriculum, their physical surroundings, and the broader environment, in which diversity is honoured and all individuals are respected. Be sensitive to issues related to cross-cultural communication, like differences in accents and speech patterns, differences in greetings, or preferences around physical touch (e.g. handshakes) that may lead to direct or indirect discrimination. (PPM 119) (Ministry of Education, 2017). In some cultures, it is impolite to look a person in a position of authority directly in the eye. In others, contradicting another person openly is unacceptable, especially if that person is in a position of authority. Indigenous peoples and other cultures often look askance at self-promotion and are more likely to credit others for their successes (University of Lethbridge, 2007).

3.20 **Lived Experience:** refers to the personal knowledge that an individual has gained through their experiences and interactions in the world. These lived experiences are shaped by intersectional identities such as race, gender, class, sexual orientation, creed, etc. An individual's identity impacts how they experience the world and the various systems of oppression (e.g., racism, sexism, homophobic/transphobia). Having lived experiences that mirror the lived experiences of students allows educators to understand and validate the experiences of students and communities that they serve. Understanding lived experiences can also serve as a means by which systemic gaps are identified and addressed to ensure equity and inclusion so that barriers can be recognized and eliminated.

3.21 **Merit:** is being worthy and deserving of consideration. The way in which this traditional concept of merit is interpreted and applied in the hiring process must be through an equity based anti-racist and anti-oppressive lens. Merit will consist of more than formal qualifications, Canadian work experience, professional credentials, assessment and awards, but will also place value on and give weight to the skills, work, traditions, experiences, and perspectives derived from the lives of job applicants.

3.22 **Meritocracy:** A social system that is supposedly organized so that people can obtain success and/or power because of their skills and abilities, not because of their money, social position and/or family history. As inequality has persisted in society, especially for specific groups, meritocracy has been identified as a tool that upholds the existing economic, social and political hierarchies.

3.23 **Oppression:** The systemic and systematic suppression of a group(s), by the group in power.

3.24 **Privilege:** The benefits, advantages and power given due to the social identities shared with the dominant culture. Privileges are granted and favoured by institutions and social norms that were created by those in the imaginary box.

3.25 **Racialized Employees:** Refers to employees who can have racial meanings attributed to them as a group in ways that negatively impact their work and social

life. This includes but is not necessarily limited to people classified as "visible minority" under the Canadian census and may include employees impacted by antisemitism and Islamophobia.

3.26 **Racial Equity & Racial Parity:** Racial Equity & Racial Parity refers to the fair treatment of all people, with equitable opportunities and outcomes. It entails consideration of the unique barriers that different ethno-racial groups face and engaging with them on policies and practices that impact them. Similarly, racial parity refers to the equitable representation of racial composition and representation across the board. It also refers to equitable access to employment and educational opportunities and outcomes for people of all socially constructed racial groups.

3.27 **Systemic Racism:** A form of racism that is expressed in racialized outcomes rather than individual targeting. It is embedded in policies, practices, and creates racial disparities without any expressions of racial intent or explicit racial bias. Organizational policies and practices that marginalize members of racialized groups limit their access to benefits and opportunities.

3.28 **Targeted Universalism:** A principle which recognizes that everyone benefits from government's targeted removal of systemic barriers faced by the most disadvantaged communities. Reducing barriers and disparities leads to a better outcomes for our students and community.

3.29 **Unconscious Bias:** Refers to the unconscious assumptions, beliefs, attitudes and stereotypes that humans have about different groups. Research demonstrates that unconscious biases systematically disadvantage people and groups who are already disadvantaged by systemic discrimination.

4. Procedure

4.1 Issues with Meritocracy and the Benefits of a Racially Diverse Organization

a) Simply increasing the numbers of underrepresented individuals without re-evaluating definitions of merit and excellence can lead to tokenization and an inability to retain staff. The correlation between diversity and performance is

clear across different industries and regions: more diverse teams translated directly to significantly enhanced performance. For example, a McKinsey study demonstrated that companies with gender diversity at the executive level were 15% more likely to generate above-average profitability, and companies with higher degrees of racially and ethnically diverse employees have a 35% performance advantage over companies that have racially and ethnically similar employees.²

- b) Research has demonstrated that students of African, Caribbean and Black and Indigenous achieve better educational outcomes and have better educational experiences when they have educators who understand their lived identities and intersectional experiences.
- c) Employees of color (specifically those who have been historically marginalized – Indigenous, Black, African, and Caribbean descent) in predominantly white organizations can face a great deal of social isolation and bias within the workplace. It is important to be cognizant of the unique strengths that each employee of color has, the challenges they may face in the workplace, and methods to provide support. Organizations must identify when the dominant culture is impacting the ability of employees to effectively participate, contribute, or be accepted in the workplace (e.g., communication styles that favor linear presentation as opposed to non-linear: taking turns vs. jumping in to voice an opinion; responses to showing of different kinds of emotion; defensive responses to bringing up cultural blind spots).
- d) Bias and institutional racism will affect employees of color differently than white staff and may impact each employee of color in the workplace in a different way. So it is important that hiring managers who have staff with

²-Opinion: The numbers don't lie: Diverse workforces make businesses more money". Jack Myers, Market Watch, Published August 1, 2020. <https://www.marketwatch.com/story/the-numbers-dont-lie-diverse-workforces-make-companies-more-money-2020-07-30#:~:text=Diversity%20%3D%20profitability&text=Moreover%2C%20diverse%20companies%20are%20more,entity%20and%20in%20their%20industry.&text=long%2Dterm%20value,-Racially%20diverse%20executive%20teams%20provided%20an%20advantage%20of%2035%25%20higher,the%20least%20racially%20diverse%20companies>

different cultural or racial identities than themselves, continue to advance their own learning on cultural competency and systems of privilege and power. This ongoing education will support effective management of high-performing teams and individuals.

4.2 Fighting Bias in Recruitment

- a) Hiring teams are required to embed principles of equity, diversity, and inclusion into the hiring and selection process, thereby acknowledging and affirming the diverse identities of students within the PDSB.
- b) The Workforce Planning MySite page provides [Hiring Manager Resources](#) which hiring teams should review prior to commencing a recruitment process. Included on this page is the Fighting Bias in Recruitment Toolkit. This Toolkit was created to support hiring teams with embedding unbiased recruitment practices in the hiring and selection process.

4.3 Posting Jobs

- a) In order to ensure fairness, transparency and equity in the hiring process, job opportunities must be communicated to internal and external candidates through the following processes:
- b) All external and internal permanent and LTO vacancies and casual pool hiring for all employee groups must be posted on the Applicant Tracking System (the Applicant Tracking System currently used by the Board is TalentLink). These postings must remain open for a minimum of 3 business days.

All positions of responsibility, term appointments and promotion opportunities for all employee groups must be posted on the Applicant Tracking System. Depending on the documentation required to support the application process, these positions should be posted for a minimum of 3 days to allow adequate time for applicants to prepare their packages.

- c) All LTO vacancies for these employee groups must be filled using the methods described. Other fill methods such as selecting a preferred replacement or contacting a replacement from a seniority list are no longer acceptable. These past practices do not ensure fairness, transparency and equity in the process, nor do they allow for consideration of diverse intersectional identities and lived experiences.

- (i) *Exception:* In the circumstance where a teacher, ECE, or EA is absent and is replaced by an occasional employee, and if this daily absence extends into a long term absence of at least 10 days, then this would be deemed to be an **Emerging LTO**. In this case, the vacancy does not need to be posted on TalentLink. In order to minimize disruption and promote continuity for students, the principal may choose to hire the occasional employee who had been replacing the absent educator into the Emerging LTO role. This hiring method is only valid if the occasional employee was replacing the educator on a day-to-day basis before the long-term absence was known and remained in the vacancy for 10 consecutive days.

- d) Minimum job qualifications, licenses, requirements, certifications, or credentials required by legislation, regulatory bodies, government agencies or the Board must be listed in the job posting. Any additional criteria relevant to the position that is used in screening or selecting candidates must be listed in the job posting. In order for a hiring process to be fair, transparent and equitable, candidates must understand what it is that the hiring manager is looking for in a successful candidate. This is also an opportunity for hiring managers to consider all notions of merit – such as diverse intersectional identities and lived experiences – while ensuring that staffing is reflective of the community being served. While this is not an exhaustive list of job posting criteria, these are examples of the types of information that should be provided.

- e) In addition, the hiring process for educators must align with the requirements outlined in Policy and Program Memorandum (PPM) 165 – School Board Hiring Practices and Ontario Regulation 298, "Operation of Schools". Criteria that should be considered and included in the job posting should include:
- (i) providing the best possible education program and ensuring safety and wellbeing of students
 - (ii) experience and commitment to creating a safe, inclusive, equitable, accessible, and high-quality learning environment
 - (iii) valuing applicants' additional experiences, skills, backgrounds, lived and work experience
 - (iv) school and Board priorities based on clearly defined criteria, including qualifications.
- f) Job postings will give candidates an opportunity to self-identify as a member of an equity seeking group. This voluntary self-identification is supported by a number of Provincial and Board Policies such as Section 13 of the Ontario Human Rights Code, Policy 90 – Hiring Practices, and the Ministry Directives. The Self-identification questionnaire will be included as questions in the job posting.
- g) All job postings must include language confirming that the PDSB will provide reasonable accommodation (e.g. an accessible location, etc.) based on any of the human rights protected grounds, during the hiring process if advised in advance by the candidate.
- h) Job postings should include a salary range, except in specific circumstances where salary range has not yet been determined.
- i) Job descriptions and the entire recruitment process must be inclusive. Research suggests the use of both agentic language, which tends to appeal to men (e.g., words like "assertive" and "competitive") and communal

language (e.g., words like "collaborative" and "supportive" which resonate more with women in job descriptions.

- j) All other hiring practices as outlined in collective agreements for the various employee groups must be followed.
- k) More information about how to post a job on the Applicant Tracking System can be found by [Clicking Here](#).

4.4 Screening Candidates

- a) **Conflict/No Conflict of Interest:** The Hiring Manager is responsible for reviewing the potential for conflict of interest and ensure the appropriate form (Declaration of No Conflict of Interest or Conflict of Interest) is completed for each person involved in the hiring process (e.g. screening resumes, developing interview questions, interviewing, making or having input into the hiring decision). If a real or perceived conflict of interest has been declared, the Conflict of Interest Declaration Form must also be completed and submitted to the employee's Supervisor to adjudicate and determine an appropriate remedy.
- b) **Screening Procedure:** The interview team must create a screening tool to review all applications, which must be uploaded to TalentLink upon completion of hiring process. The screening tool must use the minimum job qualifications and additional requirements that were listed in the job posting. An anti-racist and anti-oppressive lens must be used when creating the screening tool. This tool should provide for due consideration of diverse intersectional identities and lived experiences. An example of a screening tool can be found by [Clicking Here](#).
- c) In the event that a large number of applications are anticipated, hiring managers are encouraged to consider including additional customized questions that closely align with the additional assets indicated in the job posting. This will help facilitate leveraging the ability of the Applicant Tracking System to assist with screening candidates. The Applicant

Tracking System may support with screening qualifications and internal vs external candidates. Any additional criteria used in screening candidates must also be indicated in the job posting. Fair, equitable and transparent hiring practices require that the hiring team must consistently apply the screening tool to all applicants in a job competition.

4.5 Preparing for Interviews

- a) In preparation for interviews, individuals must keep in mind that the interview process must be equitable, consistent, transparent, accountable and uphold the Board's commitment to anti-racism (in particular anti-Indigenous and anti-Black racism) and anti-oppressive principles. This must be taken into account throughout the entire hiring process – from job posting to the final hiring decision.
- b) **Interview Panel:** The interview panel must comprise of at least two (2) members and every effort must be made to have a diverse interview panel. The interview panel can comprise of the Hiring Manager, Superintendent, Controller or Supervisor. Panel members must review the list of candidates selected for an interview to ensure that there are no conflicts as outlined in the Board's Conflict of Interest Policy (Policy 8).

c) **Deciding on the Format of the Interviews:** Members of the interview panel must decide on the format of the interviews and what weighting (score) would be assigned to each question. All aspects of the interview process must be finalized among the interview team prior to conducting the interviews. The following must be considered:

- (i) Will the candidates be required to complete a test? Testing can be conducted prior to the interview, at the time of the interview or after the interview.
- (ii) Will the candidates be asked to present on a specific topic at the beginning of the interview? These factors must be agreed on and communicated to the candidates.

(iii) Will the candidates be provided a copy of the interview questions at least a few minutes prior to the interview to prepare?

(iv) Will panel members take turns asking the questions or will only one member ask the questions while the other member takes notes?

(v) How will the interview team determine the scores for each question and category? Will it be by consensus? Or an arithmetic average of the individual scores?

(vi) What weight will be assigned to the interview, testing (if applicable) and the references. This weighting must be consistent for all applicants in a given job competition.

d) **Accommodations:** Candidates must be informed that the Peel District School Board will provide reasonable accommodation, based on any of the human rights protected grounds, during the hiring process if advised in advance. This information will be provided when the candidates are contacted for an interview by the Hiring Manager and when making a job offer by the Workforce Planning Partner. When interview teams are advised of a need under the Ontario Human Rights Code, they have a duty to accommodate this need – to the point of undue hardship. Examples of accommodations under the Human Rights protected grounds:

- (i) Candidate is a seventh day Adventist and interviews are being conducted on a Saturday. An alternate date must be offered.
- (ii) Candidate has mobility issues and cannot use stairs. Arrangements must be made to facilitate access to the building and the interview room. Candidate can be interviewed in a room on the ground floor.

e) **Developing the Interview Questions:** Interview questions must be based on the description in the Job Posting. Additionally, interview questions must be developed ensuring that anti-racist and anti-oppressive lenses are applied to the questions. The questions asked in an interview are another way to

identify a candidate's skills and abilities related to equity skills sets and competencies.³

- (i) Questions should be skill / experience-based and whenever possible, asked using the "behavioural" model (e.g. Tell me about a time when you had to deal with an upset client).
- (ii) Have a set of interview questions with look-fors to guide the interview and assist with scoring the interview.
- (iii) Prepare a list of "look-fors" in your expected responses – from this list of "look-fors," develop a scoring system to provide a quantitative evaluation of the answers.
- (iv) Keep in mind that the look-fors are not necessarily an exhaustive list and candidates might provide alternative responses that were not anticipated by the interview team.
- (v) Prepare a set of interview questions **without look-fors** to share with the candidates during the interview.
- (vi) It is very important that all candidates for a particular job competition are asked the same questions. Members of the Interview Team may ask probing questions if needed. These probing questions should be kept to a minimum and utilized only where needed. If a probing question was asked in the interview, a notation must be made to this effect in the interview notes.
- (vii) A Workforce Planning Partner can provide assistance with developing appropriate interview questions that are specific to the position.
- (viii) Question(s) regarding diversity or lived experience must be included in the interview (and reference check) processes. This will allow candidates the opportunity to share their experiences to ensure they will

³ "Operationalizing Racial Justice in Non-Profit Organizations", Maggie Polapchuk, MP Associates, July 2020, http://www.mpassociates.us/uploads/3/7/1/0/37103967/operationalizing_racial_justice_-_np_edition_-_mpassociates_final_draft_aug_20.pdf.

be able to support and reflect the diversity at PDSB. For example, asking about the actions a candidate has taken to support equitable education outcomes for all students.

4.6 Interviews

- a) **Offering Interviews:** When contacting candidates to offer interviews, two different interview times on two different dates should be offered where possible. If this is not possible, candidates should be informed of their ability to request accommodation in the interview process. A minimum of 5 candidates who meet the minimum job requirements must be offered interviews for all permanent and LTO positions. If fewer than 5 applicants have applied for the position, then all candidates who meet the minimum job requirements must be offered an interview. Internal candidates, including casual staff who have working obligations, must not be offered interviews during normal working hours. If a candidate cancels an interview with less than 24 hours notice, and without providing a reasonable explanation (e.g. family emergency, accident, etc.), the hiring manager has discretion to contact an additional candidate, or proceed with the candidates who have already accepted the interview offer.
- b) **Conducting Interviews:** All interviews must be conducted in compliance with the *Ontario Human Rights Code* and the Peel District School Board equity policies / practices. It is recommended that Managers / Superintendents / Controllers become familiar with all relevant legislation and Board policies. Before starting the interviews, candidates must be informed of any requirements/expectations of the interviews. The interview panel members must develop a speaking script to ensure that all the candidates are provided with the same information/instructions at the beginning of the interviews to help the candidates understand the depth of responses expected. Example:
 - the interview team should introduce themselves and the pronouns they use;

- the interview team may provide a concise overview of the position at the interview's outset to aid interviewees in better understanding the role;
 - the candidate should be asked to show their government issued photo ID (in this regard, the candidate should conceal any personal information displayed on the ID, while ensuring only their photo and full name are visible);
 - the interview will consist of "x" number of questions, and at the end the candidate will be given an opportunity to ask questions of the interview team;
 - for the sake of consistency between candidates, the interview will be maximum of "x" minutes;
 - in virtual interviews, the camera must be on for the duration of the interview for both the candidate and interview panel;
 - in virtual interviews, the candidate must be alone in the area/room during the interview and the candidate should be asked to confirm this before the beginning of the interview; and
 - the only documents that a candidate is allowed to reference during an interview would be a copy of their resume, portfolio, or other document/resource that has been intentionally identified as an expected part of the interview (such as an artifact that the candidate was asked to speak to) candidates should be advised that a printed copy of the questions will be shared for them to refer to during the interview (for virtual interviews this might be done through electronic means);
- c) **All candidates must be asked the same set of questions in a specific competition.** Candidates must all be provided with a consistent length of time in which to complete the interview. Interviews will typically last 30 to 60 minutes. An opportunity should be given to the candidates to ask questions of their own and provide any additional information not covered in the interview questions. Interview notes must be taken by all members of the

Interview Team. Notes can be brief using key words and checking off appropriate "look-fors" but must be clear and understandable. It is not essential that candidates provide exact "key words" in their responses. Interviews are not an exercise in trying to match a pre-conceived list of "buzz" words or jargon. Instead, interviewers should be capturing the essential components of a response along with concrete examples and context that demonstrate the required knowledge, skills, and lived experiences. Interview notes should, as accurately as possible, reflect the candidate's responses. These notes will be the evidence upon which hiring decisions will be made and will inform feedback that is given to the candidates.

d) **Rating the Interview and References:** It is important that the interview and references are appropriately weighted when making a hiring decision. For example, prior to starting the interview process panel members may have agreed that the interview component should comprise the majority of the final weighted score (e.g. 70%). The interview is key in determining the suitability of candidates and the interview team will have an opportunity to determine the relative merit between the candidates in terms of qualifications, skills and lived experiences. The reference check process is an opportunity to verify job-related skills, abilities and experiences. While the reference checks are important, this component of the final weighted score (e.g. 30%) should be substantially less than the interview component.

e) **After the Interviews:** The responses for each candidate should be promptly scored after each interview. The candidates must be scored individually – that is, the scores of prior candidates must not be used as a benchmark for the other candidates during the interview process. All members of the interview panel must come to a consensus in terms of the final score for each candidate, whether that score is determined by a moderated process or by an arithmetic average of the individual scores.

4.7 Reference Checks

- a) References are essential as they confirm/validate the information provided by the candidate on their resumes and during the interview. References are required for candidates that received high scores during the interview. Reference scores are used as part of the candidate's total score.
- b) As references are only to confirm/validate, reference checkers must be mindful that they are not assessing how referees articulate candidate's information, only the information itself.
- c) Providing a reference must be given serious consideration and is a responsibility that must not be taken lightly. When providing a reference, factual and honest information must be provided regarding the individual. Performance or behaviour concerns may be shared, as long as these have been formally addressed by the supervisor with adequate supports and opportunity to demonstrate improvement. If these concerns have not been formally addressed, then they should not be shared when providing a reference. There should be no surprise to the candidate regarding the information that was shared during a reference check. As part of the feedback process, the candidate may request information regarding the reference check responses that were shared. Additionally, referees should be mindful of the words and phrases they choose to describe a person's qualities, skills and abilities to ensure that they are not being influenced by unconscious bias in these choices, which could contribute to inequity in hiring practices.
- d) Candidates have a responsibility in the reference check process to perform their due diligence and inquire as to what will be shared regarding their performance and behaviour during the reference check. The candidate should not make assumptions about what information will be shared during a reference check.
- e) Candidates must complete a Reference Form on TalentLink giving authorization to contact their referees. At least 2 supervisory references, who are able to speak to the applicant's experiences must be checked. No

- decision can be made with only 1 reference either positive or negative. A third or subsequent supervisory reference may be requested if previous references are not able to be contacted, are inconsistent, or if not able to comment on certain experiences. Applicants will be asked to provide 3 supervisory references to facilitate the process being completed in a timely manner.
- f) If a candidate is unable to provide a current supervisor reference, the hiring manager or the candidate must contact Workforce Planning for review.
- g) In situations where a candidates' supervisory references are also the interviewers/reference checkers, an additional reference should be included when possible. If the candidate is unable to provide an additional reference, the other interview panelist must be the reference checker and ask questions to the interview panelist that is the reference.
- h) Applicants may choose to provide an additional non-supervisory reference who is able to confirm other relevant job-related experiences.
- i) Applicant may choose to not provide current supervisor as a reference. An alternate reference from a senior staff/manager may be provided instead who can confirm the candidate's job-related experience. The applicant may choose to provide a brief explanation why they are not including their current supervisor. If a candidate has questions about providing alternative references, they should contact a Workforce Planning Partner .
- j) The hiring manager must ensure that the references listed on the Reference Form align with the employment experiences as indicated on the resume. They should ensure that gaps in employment history are accounted for. Candidates may be asked to resubmit the Reference Form to ensure that the references provided meet the criteria previously outlined.
- k) The reference questions may be sent electronically to referees. However, these reference questions must be sent to a work-related email address. A

follow-up call can be made if clarification is required regarding the information provided.

l) The scope of reference check must be to verify employment information and to confirm job-related information (e.g. knowledge, skills, and experiences) provided in the interview process (e.g. resume, cover letter, artifact, etc). Questions asked in the reference check should align with those developed for the interview and should reinforce the objective criteria of the essential duties of the job. This approach will confirm or negate information obtained through the interview process. A question related to lived experiences and merit must be included in the interview and reference check process to ask candidates about their experiences working with individuals from diverse backgrounds to ensure they are able to support the full diversity of Peel region. This question should have a focus on equity and diversity.

m) References should be weighted in the selection process. Satisfactory references should be provided a weight of no more than 25%. Unsatisfactory references may disqualify a candidate. In this context, examples of unsatisfactory references might include: misrepresenting job related experiences, recurring performance or disciplinary issues that have been addressed. It is not necessary to conduct reference checks for all the candidates who were interviewed. References should be checked for the top candidates being considered for the position.

n) The candidate must affirm that there are no current performance or disciplinary issues that have been recorded and submitted to the employee's personnel file within the last 24 months or are outstanding.

o) The applicant may request information provided by references as part of the feedback process. If an applicant has concerns about information provided by a reference that is alleged to be false, they should contact Workforce Planning.

p) Falsification of information in the interview process, may lead to disqualification or discipline.

q) Additional Notes – re: References

(i) For new graduates (i.e. graduated within the last 18 months) from pre-service programs, any 2 of the following may be considered as acceptable references:

(a) Associate (Host) Teachers/Supervisors

(b) Practicum Coordinator

(c) Principal or Vice Principal for the school where candidate completed a practicum placements

(ii) For experienced teachers, one reference must be from a supervisor from the most recent school board. If the candidate is currently working with another organization, a supervisory reference from that organization in addition to one from the last or most recent school board will be required. If a candidate is unable to provide the name and contact information of the reference from the most recent school board / organization, they should provide contact information for a managerial staff in the Human Resources Department for that school board / organization.

4.8 Determining the Successful Candidate

a) Hiring Managers must be conscious and intentional in acknowledging the lived experiences of employees. More importantly, decisions must be informed by the demographics of the PDSB families and communities and the composition of the various staff groups to address disparities and inequities. After completion of the reference checks, the panel members must meet and review all of the candidates in accordance with the established criteria.

b) The interview panel members must take into account the following criteria when selecting the successful candidate:

(i) The specifications for the position being filled;

- (ii) The required skills and qualifications for the position, including lived experiences and diverse identities (as indicated in the job posting);
 - (iii) The job-related experience of the candidates;
 - (iv) The results of the interview and testing (where applicable);
 - (v) The references of the candidates; and
 - (vi) Demographics of the PDSB students' communities and the composition of the various staff groups, instructional, operation, and administrative to address disparities and inequities.
- (vii) Note: In some employee groups seniority may also be a factor in selecting the successful candidate. Please refer to the respective Collective Agreement.

4.9 **Recommendation to Hire:** Hiring managers will make a recommendation to hire a candidate. For job competitions posted on TalentLink, the recommendation to hire will be made through that platform. All pertinent documents must be uploaded to TalentLink for retention and audit for accountability purposes. Competition Files must include the following documents:

- a) Conflict of Interest/No Conflict of Interest Form (available on TalentLink)
- b) Screening Tool
- c) Results of the Screening Process
- d) Interview Notes
- e) Reference Check Consent Form (available on TalentLink)
- f) References
- g) Final weighted scoring of the candidates

4.10 Note: These requirements pertain to all panel members, and it is the responsibility of the Hiring Manager to ensure that this information is collected from other panel members and appropriately stored/forwarded for storage as per the document retention policy/process.

4.11 Job Offer

a) The Manager / Superintendent / Controller/ Administrator advises Workforce Planning, where applicable, of the successful candidate by making a *Recommendation to Hire*. Depending on the employee group, HR staff will review the competition file and advise of next steps. Hiring Managers must receive confirmation from Workforce Planning to proceed prior to making a job offer to a candidate.

b) **Written Offer of Employment:** Written offers of employment for LTOs and external candidates are provided by Human Resources. Information included in the written offer will include:

- (i) Acceptance of Position
- (ii) Start Date
- (iii) Salary
- (iv) Mandatory Training to be completed
- (v) Conditions of Employment (Business Staff)

(vi) Note: The successful candidate's educational credentials may be requested in the offer letter as a condition of their employment and will be verified by Human Resources upon their submission. (Note:

accommodation may be provided if a candidate is unable to immediately supply the documents needed to verify their academic credentials due to extenuating circumstances.)

c) **Onboarding of External Candidates (Sign-On):** Once the relevant documents including satisfactory criminal background check are received, the external candidate will be provided with notification regarding their start date and next steps. A list of the required documents will be included in the written offer of employment letter/email. Hiring managers will be notified when the onboarding is complete.

- d) **Orientation:** Hiring Managers/Superintendents/Controllers/Supervisors must offer an orientation session to new employees. The orientation session must highlight key applications that the individual will use in the execution of their duties. In addition, it should provide information that will assist with getting them orientated to the school or work location. Another staff member instead of the hiring manager can be assigned the task to act as a "shadow/coach" to support the new employee in the first week of employment.
- e) **Providing Feedback to Candidates:** All unsuccessful candidates who have been interviewed, should be notified of the outcome of their interview. If requested by the candidate, they should also be given an opportunity to receive constructive feedback. Providing constructive feedback is important to ensure candidates understand the process used by the selection committee. Feedback also assists the unsuccessful candidates to understand the panel assessment of their strengths and discuss areas for growth against the job-related requirements. This may further assist them to identify areas for further development or areas to improve on for future interviews. The following should be considered when providing feedback to an unsuccessful candidate:
- (i) Feedback should always be clear and concise and should assist the candidates to understand their strengths and areas for improvement related to the job-related requirements.
 - (ii) When feedback is requested, provide it in a timely manner.
 - (iii) Schedule a time with the candidate to provide the verbal feedback.
 - (iv) Where possible, have a face-to-face discussion. Otherwise, have a telephone conversation so you can provide further information and respond to direct questions. If required, both members of the interview team may wish to participate.
 - (v) Always provide verbal feedback as there is as written / email feedback may be taken out of context or misinterpreted.

- (vi) Ensure you have sufficient documentation from the selection process to assist with providing meaningful feedback. It is also important to remember that effective documentation ensures decisions made are open and transparent.
 - (a) Prepare your feedback before you contact the applicant.
 - (b) Refer to your interview notes and be prepared to support your decision and how it relates to the job requirements on the job posting.
 - (vii) Always be factual and relate the feedback to the job requirements - not feelings, impressions or views of the candidate's personality. Give factual examples from the interview process.
 - (viii) Share the candidate's strengths related to the job requirements, and then the areas for improvement and where the candidate did not meet the job requirements.
 - (ix) Do not compare the candidate to any other candidate and do not refer to other candidates by name or give any identifiable information.
 - (x) If there are areas the candidate could improve for future applications, explain this to the candidate.
 - (xi) While providing the feedback, should it become apparent it is best to continue the discussion at another time, please end the discussion and ask the candidate to schedule a time when the conversation is beneficial and the candidate is prepared to receive the information.
 - (xii) Contact the Workforce Planning Partner if you have any queries or concerns or wish to discuss the potential feedback before providing it to a candidate.
- 4.12 Retaining Competition Files
- a) As per Ministry Directive # 25 and further approval by the Board on April 26, 2021 competition files will be retained as follows:

- (i) Three (3) year period for all job competition files including all documentation related to hiring, promotions, acting and temporary appointments in PDSB from the conclusion of the hiring process (i.e., once a hiring, promotion, acting and/or temporary appointment has been made or where applicable, a list of successful applicants has been created). Any complaints made under the Human Rights Code or grievances must be done within a specific timeframe and as such this 3 year period will allow for this.
- (ii) Where there are grievances or complaints against an appointment or the hiring process, the job competition file including all documentation related to hiring, promotions, acting and temporary appointments in PDSB from the conclusion of the hiring process, must be retained until such time as all grievances or complaints are resolved.
- (iii) Ten (10) year retention period for all job competition files including all documentation related to hiring, promotions, acting and temporary appointments in PDSB from the conclusion of the hiring process that are or potentially will be the subject of litigation.
- b) All records from the job competition must be uploaded to TalentLink promptly, within 2 business days, upon conclusion of the job competition. This will enable PDSB to be in compliance with Ministry Directive #25 as well as with Policy #90 – Hiring Practices.

4.13 ACCOUNTABILITY

- a) Any plan or strategy will not be successful without accountability measures. Accountability helps build trust in the hiring process and is necessary when implementing equitable and inclusive best practices. Additionally, staff and community have demanded that all PDSB initiatives, functions, programs and policies have accountability measures in place.

- b) Hiring processes across the organization should align with the Board strategic goals and projects. All job competitions must retain the relevant documentation for the specified time period, and are subject to audit.
- c) In some circumstances specialized hiring plans should be developed to ensure that the hiring process aligns with the Board direction. In these cases, no recruitment process should begin until the hiring plan has been approved. Steps in the hiring plan should include things such, but not limited to:
 - (i) Demographic make-up of the school;
 - (ii) Suspension and expulsion data;
 - (iii) Social Vulnerability Index data;
 - (iv) Having a job posting that not only reflects instructional qualifications but also lived experience, that the job posting skills and requirement for the job reflects the pressing needs of the school, which includes the need for staff representation along gender, sexual orientation, racial, cultural and linguistic lines;
 - (v) Demonstration that the interview tool and look-fors were created using an equitable, anti-oppressive lens that will account for a wide range of experiences;
 - (vi) Demonstration that the hiring panel have the requisite knowledge skills and ability to assess candidates, including assessing lived experience of candidates from non-dominant groups;
 - (vii) The hiring plan outlines how it will attempt to recruit Black, Indigenous and racialized candidates;
 - (viii) Consultation with Recruitment and Workplace Equity;
 - (ix) Plan must be compliant with Policy 90 and Policy 51; and,

- (x) Hiring plan must demonstrate that it is in alignment with the Ministry Review and directives in its commitment to disrupt anti-Black racism, anti-Indigenous racism

4.14 Data Collection

a) Data collection practices and processes are being established to help identify and monitor systemic racism and racial disparities in hiring within the PDSB. PDSB is committed to creating an equitable and inclusive organization with staff that reflect the students and communities it serves. To assist in reaching this goal, data collection processes will be created that establish consistent, effective practices for producing reliable information to support evidence-based decision making to help eliminate systemic racism and promote racial equity. By collecting and using race-based data in the hiring process, PDSB will be better able to identify and address gaps, eliminate barriers and advance equitable hiring practices. Review the Identity Based Data Collection Policy (Policy XX) to learn more about this process.

b) These data collection processes do not replace, limit, or diminish any responsibilities or obligations owed to persons under the *Ontario Human Rights Code, 1990* (the 'Code'). It is important to note that while PDSB's data collection efforts are undertaken to help eliminate systemic racism in hiring, collecting race-based and other personal information has a challenging history among racialized groups. Indigenous communities have a particularly difficult history associated with research and data collection, as they have been the subject of non-consensual medical and social experiments without regard for their human rights as well as having been assigned names and numbers by the government of Canada. Additionally, governments at all levels have collected personal data on Indigenous persons to control their movement, limit their access to services, monitor their populations, and subject them to a higher level of scrutiny and enforcement than the White population. As a result, many Indigenous and other racialized peoples are suspicious of efforts to collect their personal information, and efforts must be

taken to understand the mistrust these communities have of organizations collecting this data. PDSB will undertake to ensure that personal information is collected sensitively, that appropriate protocols and processes are in place for the storage, use and de-identification of any information collected, and that the information collected is used to benefit these traditionally marginalized communities.

c) PPM 165 also notes that quantitative data collection is the first step to helping boards identify employment barriers, and encourages school boards to explore how they can collect voluntary demographic information from candidates to assess diversity in as well as possible within the teacher hiring process. The PDSB is extending this collection and analysis to all positions being hired for.

d) Collection of Personal Information

(i) Personal information will be collected directly from the individual to whom the information relates. Collecting personal information directly from the individual to whom it pertains is critical to ensuring that voluntary consent for collection is obtained.

(ii) Personal information that is collected directly from the individual to whom it relates will be based upon voluntary consent that is freely given. No program, service, benefit, or opportunity will be withheld and/or denied because an individual does not provide, or refuses to provide the personal information requested. In obtaining voluntary consent, care will be taken to ensure the request is framed and stated in a manner that does not unduly pressure any individual to provide their personal information.

(iii) Every individual, at any stage of the process, has the right to give, deny or withdraw their consent for the collection and use of their personal information. The individual may withdraw their consent at any time, but must be informed that the withdrawal of consent does not have a retroactive effect and that the information already collected can be used

by the PDSB in accordance with the stated rules around collection, protection and use of personal information.

- (iv) Personal information will only be collected upon the express consent of an individual, either orally or in writing, after they have been informed of their right to refuse or withdraw their consent, that they will not be denied service, benefit or opportunity if they refuse, and what the organization intends to do with the information collected. If an individual requests further information from the organization relating to data collection practices and processes, it shall be provided before they provide their express consent. Express consent means that the PDSB will provide all individuals with an opportunity to actively communicate positive agreement to the collection of their personal information.
- (v) The PDSB will maintain records of express consent provided, withheld or withdrawn and includes the dates of such activities. If this information is collected online, the PDSB will provide a click-through notice that requires respondents to consent to the collection and use of personal information before they proceed.
- (vi) Individuals will be informed of their ability to withdraw their consent and the process to do so. Individuals may withdraw their consent at any time that their personal information is held by the PDSB. If an individual wishes to withdraw their consent, they must do so in writing and will be provided with the information of the specific position/department that their request should be directed too. A withdrawal of consent is not retroactive, and does not require that PDSB re-conduct analyses it has already done using the personal information. Upon receiving a request for the withdrawal of consent to collect and/or use personal information, the PDSB will respond in writing to the individual within a specified period of time and will inform them that their request has been processed, their personal information will no longer be used, and that their withdrawal does not have a retroactive effect.

- (vii) The notice that will be provided to individuals when their personal information may be collected will include the following:
 - (a) That the collection is authorized under PDSB Policies and applicable legislation;
 - (b) The purpose for which the personal information is intended to be used, including whether it will be combined with other information;
 - (c) That no program, service, benefit or opportunity may be withheld because the individual does not provide, or refuses to provide the requested personal information;
 - (d) The position and/or department, including an e-mail address, that questions can be directed too;
 - (e) Information on how to access, correct and/or withdraw their consent;
 - (f) How privacy will be protected, including who will have access to the information and efforts to de-identify the information.
- (viii) Providing this notice is essential to obtaining express consent as it provides important information as well as ensuring that individuals understand their rights and who to contact with questions. Notice will be provided in a way that is inclusive and responsive to an individual's needs while respecting their dignity. It will be concise, accessible, in plain language, readily understandable and available in alternative formats/translations, as necessary.
- e) How Personal Information Will be Collected
 - (i) Appropriate collection methods and processes will be accessible, protect confidentiality and privacy, and respect individual dignity. It is important that personal information is collected in a respectful, culturally safe, and accessible way that ensures individual privacy and confidentiality. If personal information is to be collected orally and/or in person, PDSB employees, consultants and/or agents will be trained to collect this information in a way that aligns with the values of the Board and the intent

of this OP. They will also be trained to answer basic questions or concerns about the collection, use and protection of personal information.

(ii) A culturally safe and respectful method of collection means that individuals feel physically, socially, emotionally and spiritually safe. There is no challenge to or denial of a person's identity, and the collection experience does not diminish, demean, or disempower the cultural identity or well-being of the individual. In addition, this consideration recognizes that, due to the ongoing impacts of anti-Black racism and anti-Indigenous racism, Black, racialized and Indigenous people may be uncomfortable to provide their personal information.

(iii) The PDSB will design their personal information collection processes to support the accuracy and completeness of the information collected. This will include careful consideration of response options that have been shown to negatively impact the rate of responses as well as the format and language used to request the personal information. Online collection methods will avoid forcing a response (for example, where a respondent must select a response in order to advance to the next question or portion of the process), to the extent possible. If a forced response design is necessary for all or part of the collection, the a "non-response" (for example, 'prefer not to answer') will be provided to ensure that individuals are able to expressly choose to not provide the information requested.

f) When Personal Information Will be Collected

(i) Personal information will be collected at the earliest appropriate time in the hiring process that an individual is engaged in. Repeated requests for personal information at various points in the process will be minimized. Where personal information about Indigenous identity, ethnic origin and race are collected, the PDSB will make efforts to sequence questions so that Indigenous identity and ethnic origin are asked immediately prior to race. This is important as research on survey methods shows that the order of questions affect how people respond, and questions that come

first provide a frame of reference that influences how individuals interpret and respond to later questions. When individuals are asked to provide information about more specific identities (such as Indigenous identity and ethnic origin) prior to being asked about race, they are more likely to select a race category and less likely to write in a unique response or refuse to answer. Questions about religion will be placed either before the Indigenous identity question or after the race question.

g) What Personal Information Will be Collected

(i) The PDSB may collect personal information as part of the hiring process. For example: Indigenous Identity, Race, Ethnic origin, Education, Gender identity and gender expression, etc.

(ii) The types of personal information listed above may be relevant for analyzing systemic racial inequalities in outcomes by considering the intersection of race with other social identities. It also supports a better understanding of the factors that potentially contribute to, reinforce and/or underlie systemic racial inequalities in hiring. This is because Black and other racialized individuals may experience unique and distinct systemic barriers shaped by multiple and overlapping identities and social locations such as disabilities, low income, language barriers, etc. The collection of personal information about Indigenous identity should follow the question and response guidelines set out below:

- Question: Do you identify as First Nations, Metis and/or Inuit? If yes, select all that apply.
- Response Options: No, Yes (First Nations), Yes (Metis), Yes (Inuit)
- A 'prefer not answer' option can be permitted in oral hiring processes to record that the question was asked and that the respondent chose not to answer.

(iii) Respondents may select multiple options, but may not select both yes and no options.

(iv) Collecting information on Indigenous identity as described above is consistent with the approach undertaken by Statistics Canada, in which 'First Nations' includes both status and non-status Indigenous people. By collecting personal information in this manner, PDSB is reaffirming its commitment to identify and eliminate anti-Indigenous racism in hiring processes by identifying and understanding the unique experiences of systemic racism resulting from the history of settler colonialism and the impacts of intergenerational trauma.

(v) The collection of ethno-racial personal information should follow the question and response guidelines set out below.

(vi) **Question:** Which race category best describes you? Select all that apply.

(vii) Response Options:

Race categories	Description/examples
Black	African, Afro-Caribbean, African-Canadian descent
East/Southeast Asian (Optional**): may collect as two separate categories - East Asian and Southeast Asian)	Chinese, Korean, Japanese, Taiwanese descent; Filipino, Vietnamese, Cambodian, Thai, Indonesian, other Southeast Asian descent
Indigenous*** (First Nations, Métis, Inuk/Inuit)	First Nations, Métis, Inuit descent
Latino	Latin American, Hispanic descent
Middle Eastern	Arab, Persian, West Asian descent, e.g. Afghan, Egyptian, Iranian, Lebanese, Turkish, Kurdish, etc.
South Asian	South Asian descent, e.g. East Indian, Pakistani, Bangladeshi, Sri Lankan, Indo-Caribbean, etc.
White	European descent
Another race category	Another race category (Optional: allow write-in response)

- A preamble should be placed immediately before the race question to help respondents understand what the question will be asking.
- Categories will be presented in alphabetical order unless there is evidence that a different order might increase response rates.

- Examples and descriptions will be provided to help individuals select the appropriate response for them.

- Respondents may select multiple options.

(viii) The race question and response categories align with how researchers and organizations in other jurisdictions ask questions about race. It recognizes that race is a social construct, and that ideas about race are often ascribed to or imposed upon people. Using race categories that measure and reflect how an individual may be described by others helps to better identify Black, Indigenous and racialized communities' experiences and treatment in the hiring process. The race categories used above are the main categories commonly used as social descriptors within the province of Ontario. It is important to note that they are not based on science or biology, but on differences that are socially constructed.

h) Management and Protection of Personal Information

(i) PDSB takes the management and protection of personal information very seriously, and will put in place administrative, technical and physical safeguards to ensure the security of any personal information provided to the Board. These measures will be appropriate and proportional to the nature of the information to be protected and will include the following considerations:

- (a) Sensitivity and amount of personal information that may be disclosed;
- (b) The number and nature of people with access to this information; and,
- (c) Threats and risks associated with the personal information.

(ii) The PDSB will develop protocols for employees, consultants, agents and/or members of the public to identify and report possible security issues to a specific position/department. As any possible privacy breaches can have a significant impact on the individual to whom the

and personal information required, and could include the following categories:

- (a) Pseudonymous data: Data from which direct identifiers have been removed or replaced with a confidential code or pseudonym.
- (b) De-identified data: Data that has been transformed or modified so that there is no reasonable expectation in the circumstances that the information could be used, either alone or with other information, to identify an individual.

i) Individual Access to Their Personal Information

- (i) The PDSB will develop protocols for individuals to request access to their personal information as well as for individuals to modify, correct and/or request the withdrawal of their personal information from the database. The ability of individuals to access, correct and/or withdraw their personal information is important to respecting individual dignity and ensuring the accuracy of the information collected. It is also an important aspect of voluntary express consent. These protocols will set out the following:

- (a) Individuals can request the correction and/or modification of their personal information where they believe there is an error or omission;
- (b) Individuals can request the withdrawal of their personal information from the dataset if they no longer want it included; and,
- (c) A time period within which, and a specified position to whom the request must be made;

- (d) Considerations if the request comes outside the specified time frame.
- (ii) This protocol will be written in plain language that provides clear direction on how individuals can request access, correction and/or withdrawal of their personal information, and will be posted clearly on the hiring processes website. All requests will need to be submitted in writing, and the individual making the request will be required to verify their identity prior to the PDSB processing their request. The verification required will

personal information is linked, the PDSB will take the following steps upon learning of a privacy breach:

- (a) Implement the protocols;
- (b) Identify the scope of the breach and take action to contain it;
- (c) Identify the individual(s) whose privacy may have been breached, and when appropriate, notify them accordingly. This should take into account any historical legacies around data collection and privacy as well as providing information on next steps and who to contact with questions or concerns;
- (d) Inform the relevant Associate Director of the privacy breach;
- (e) Investigate the causes and take steps to address any issues or deficiencies to avoid similar breaches in the future.

- (iii) The PDSB will maintain all personal information collected through the hiring process in a secure database for a minimum of five (5) years. This will enable the analysis of both individual outcomes and long-term trends to identify and remedy systemic racial inequalities in hiring. The data stored in the secure database will be linked to some administrative and/or identifying information for the purposes of storage and analysis. Access to this information will be limited to positions who require it to fulfill their roles and these positions will not have more access than is necessary to perform their job functions.

- (iv) When conducting analyses using the data collected, the PDSB will extract from the original datasets only the personal information required for the analysis being conducted. The PDSB recognizes that de-identification is contextual, and what is considered de-identified data in one context will not be considered that in another context. Any personal information that directly identifies specific individuals will be removed and/or replaced with 'masking' information, such as pseudonym. The appropriate level of de-identification will be assessed according to the analysis being conducted

depend on the request being made as well as the personal information the individual has identified wanting to access, correct or withdraw. The PDSB will provide a written response to all requests that will summarize the following:

- (a) When the request was received, and how the individual's identity was verified;
- (b) What access provided or correction made, and why;
- (c) What was done to withdraw the data from the dataset;
- (d) If access, correction and/or withdrawal has been denied, how this decision was made, the reasons for it being made, and who the individual can contact for further information.

5. Roles and Responsibilities

5.1 Human Resources:

- a) Oversee the entire job posting process on PDSB's Applicant Tracking System
 - b) Validate and publish job listings on PDSB's Applicant Tracking System
 - c) Assess recommendations for hiring and formulate offers of employment for successful candidates
 - d) Regularly review and update the Hiring Practices Operating Procedure – while also ensuring compliance by Hiring Managers
 - e) Ensure that the organization is compliant with legal and regulatory hiring requirements
 - f) Support Hiring Managers throughout the recruitment process through training, guidance, and development of recruitment support resources
- ### 5.2 Hiring Manager:
- a) Submit job postings through PDSB's Applicant Tracking System
 - b) Confirm there are no conflicts of interest during the selection process

- c) Review applications and shortlist candidates based on job-related criteria
 - d) Interview candidates, selecting those aligning best with the job posting details
 - e) Check professional references to validate candidate qualifications
 - f) In cases of equally qualified candidates, prioritize those who self-identify as historically underrepresented
 - g) Ensure a fair and unbiased evaluation of candidates during the selection process
 - h) Implement diversity and inclusion initiatives in the hiring process
 - i) Provide timely and constructive feedback to candidates throughout the process
 - j) Conduct a thorough review of the Hiring Practices Operating Procedures and ensure compliance
- ### 5.3 Candidate:
- a) Provide accurate information as required in the job posting
 - b) Communicate availability, work preferences, and any accommodation needs
 - c) Participate actively and professionally in all stages of the interview process
 - d) Provide professional references and contact information as requested
 - e) Respectfully decline or accept job offers within the specified timeframe

6. Reference Documents

- 6.1 Ontario Human Rights Code
- 6.2 Education Act, Regulation 521/01 (322/03)
- 6.3 Regulation 298: Operation of Schools – General R.R.O 1990
- 6.4 PPM 165: School Board Teacher Hiring Practices

- 6.5 Human Rights Policy (Policy 51)
- 6.6 Equity and Inclusive Education Policy (Policy 54)
- 6.7 Accessibility Policy (Policy 76)
- 6.8 Conflict of Interest Policy (Policy 8)
- 6.9 Criminal Records Check Policy (Policy 68)
- 6.10 Anti-Racism Policy (Policy XX)
- 6.11 Identity-Based Data Collection Policy (Policy XX)

7. Revision History

Review Date	Approval Date	Description