



Local Employment
Planning Council
Conseil local de planification
en matière de l'emploi

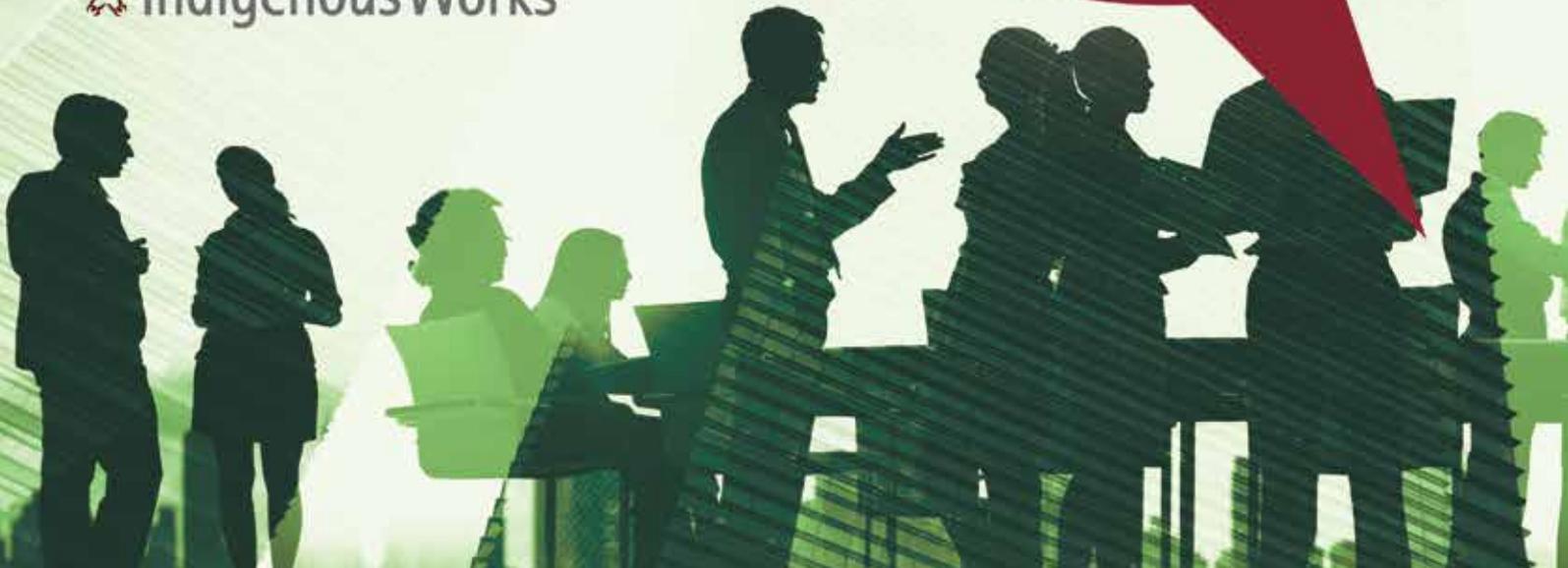
GUIDE TO DEVELOPING INDIGENOUS INCLUSION POLICIES

September 2018



IN PARTNERSHIP WITH:

 **IndigenousWorks**





Local Employment
Planning Council

ABOUT THE LOCAL EMPLOYMENT PLANNING COUNCIL (LEPC)

The North Superior Workforce Planning Board is one of eight Local Employment Planning Councils in the Province of Ontario. The LEPC for the Thunder Bay District brings together key stakeholders in Northwestern Ontario. It connects employers, industry associations, sector groups and other employer groups with appropriate employment and training services to address workforce needs.

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The information presented in this report is current at the time of printing.

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EMPLOYER TEST GROUP

We would like to extend our sincere appreciation to all local employers that took part in our Employer Test Group noted below. It is with your input and ongoing contributions to organizational inclusion that we are able to move forward to address the needs of the Thunder Bay District workforce. The Employer Test Group offered discussion about the roles of inclusion policies in their various workplaces. They also provided valuable insights into many issues pertaining to Indigenous inclusion policy formation. Insights were provided on the business case and need for inclusion policies, how such policies should be designed and introduced, as well as the issue of policy fit and measurement, to name just a few examples. Employers who voluntarily participated in the Employer Test Group are listed using the North American Industry Classification System (NAICS) code to identify the business sector which they represent. We would like to thank the members of the LEPC for their support and guidance on this and all other projects.

	Industry	NAICS Code
Employer 1	Professional, Scientific and Technical services	54
Employer 2	Retail Trade	44-45
Employer 3	Public Administration	91
Employer 4	Public Administration	91
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INTRODUCTION

This Guide is about workplace policy development to encourage Indigenous inclusion. It has been developed through the course of a 7-month project ending in September of 2018.

THE PROJECT HAS THREE GOALS:

1. Increase Indigenous employment in the Thunder Bay District;
2. Raise awareness among employers about the workforce potential of Indigenous people in the Thunder Bay District; and
3. Develop and distribute policy examples and policy templates for business which can be used to guide their efforts on Indigenous recruitment, advancement and retention as well as workplace inclusion.

This project was divided into phases during which information and research was gathered, analyzed and used to develop policy examples and policy templates pertaining to Indigenous inclusion. An Advisory Committee consisting of 14 representatives from Indigenous organizations and local businesses provided advice throughout the life of the project.

Indigenous Works was hired to do research and develop documentation for the project. They are an ISO-Certified National Organization with 20 years' experience working with companies and Indigenous organizations for inclusion and employment strategies.

This Guide is intended to assist companies and organizations to develop an Indigenous Inclusion Policy. The Guide explains some of the differences in policy approaches and some of the thinking and contexts underlying them. There are templates provided which illustrate different approaches to be taken to Indigenous inclusion policy development.

The adoption of an Indigenous Inclusion Policy sends an important message both to your management and staff as well as to external audiences that your company has made a serious commitment to working with Indigenous people, businesses and communities and that you are committed to inclusion.

WHAT IS INDIGENOUS INCLUSION?

Indigenous Works defines inclusion as an organizational state that is embraced as a cultural norm, with enterprise-wide workplace strategies as well as a culture which invites the full participation of Indigenous people into all aspects of business operations. It is where leadership and employees are welcoming of Indigenous people, their experience and outlooks, where diversity is valued, the spirit of reconciliation has been embraced and calls to action have been acted on in meaningful ways.

FEATURES OF AN INCLUSIVE WORKPLACE

1. Inclusion has been embraced as a core competency and embedded into the organizational culture;
2. Companies share their organization's experience and achievements with inclusion and explain how it has helped their performance;
3. Human rights and responsibilities are promoted and respected. Employees are free of concerns related to basic equity issues;
4. Comprehensive Indigenous procurement, recruitment and corporate social responsibility strategies have been developed as part of an enterprise-wide coordinated approach;
5. Indigenous people are employed and retained in all areas of the organization including the senior leadership and executive positions;
6. There are significant revenues and jobs gained by Indigenous people and businesses through the organization's supply chain;
7. Indigenous community sustainable gains have been realized as a result of the relationships built between the company and the community;
8. High levels of Indigenous employee engagement are seen and experienced in the organization;
9. Leadership has put into place the resources needed to sustain its Indigenous inclusion strategy and it may have introduced an inclusion policy framework or statement;
10. Indigenous inclusion is integral to the mission and vision of the organization;

WHAT INCLUSION LOOKS LIKE TO ME

"To me, inclusion means taking to heart the Truth and Reconciliation Commission's Calls to Action as they relate to our business, including relationship building, access to training and economic opportunities and educating our employees on the history of Indigenous Peoples."

WHAT INCLUSION LOOKS LIKE TO ME

"Inclusion to me means to be an equal participant of something, the workplace, society, a partnership or the economy. It infers respect for each other and being transparent. It also means taking the time to understand or try to understand different worldviews."

11. Inclusion 'matters' to the company's clients, shareholders and stakeholders;
12. The organization's executive team is held accountable for achieving all or some of the organization's Indigenous inclusion goals;
13. Indigenous employees would tend to agree that they are 'very engaged' in the company's mission;
14. Indigenous employees agree that the organization is a Workplace of Choice;
15. The organization's inclusion workplace strategy has been in effect for a period of time;
16. The organization has done a studied review of the Truth and Reconciliation Commission's Calls to Action and have developed meaningful responses;
17. Indigenous communities or businesses cite the organization as one which has been especially successful in developing good engagements, relationships and socio-economic outcomes with Indigenous people, communities and businesses;
18. The organization reports on its inclusion strategies and can measure its progress on its workplace inclusion 'position' from year to year. (This is explained further in the next section). It produces a report and shares the results with stakeholders, clients and shareholders; and
19. A learning model has been introduced into the organization which provides the means for knowledge building and transfer about its inclusion strategy.

A SEVEN STAGE MODEL TO INCLUSION

Indigenous Works has developed a 7-stage workplace model of Indigenous inclusion which is called the Inclusion Continuum. The model depicts the roadmap that organizations follow to become more inclusive, gradually enabling more effective workplace and employment strategies to be developed. The Continuum describes the organizational features and competencies needed at each stage to achieve elevated levels of performance in Indigenous employment, business development, community relations, etc. Movement along the continuum depends on companies developing their cultural competencies, improving their understanding of Indigenous people, their history and culture. Companies' position on the Inclusion Continuum can be measured from year to year to track and assess progress.

INCLUSION CONTINUUM



1 The tool is available through Indigenous Works, visit www.Indigenousworks.ca

WHAT IS A POLICY?

A policy is a deliberate system of principles to guide decisions and achieve rational outcomes: a statement of intent implemented as a procedure or protocol.

Policies are typically the responsibility of Executive members or the Board of Directors for a company or organization. Policy development may be undertaken by a committee formed from board

membership or some other executive body. Policy development may also be delegated to senior level management who bring forward recommended policy to the Board or Executive for their approval. Policies serve as a guideline for operational decision-making. Policies are helpful in highlighting the rules, values and beliefs of the organization. In addition, policies act as a basis for guiding the organization's actions.

WHAT DO POLICIES DO?

Policies provide critical direction for an organization in a variety of ways:

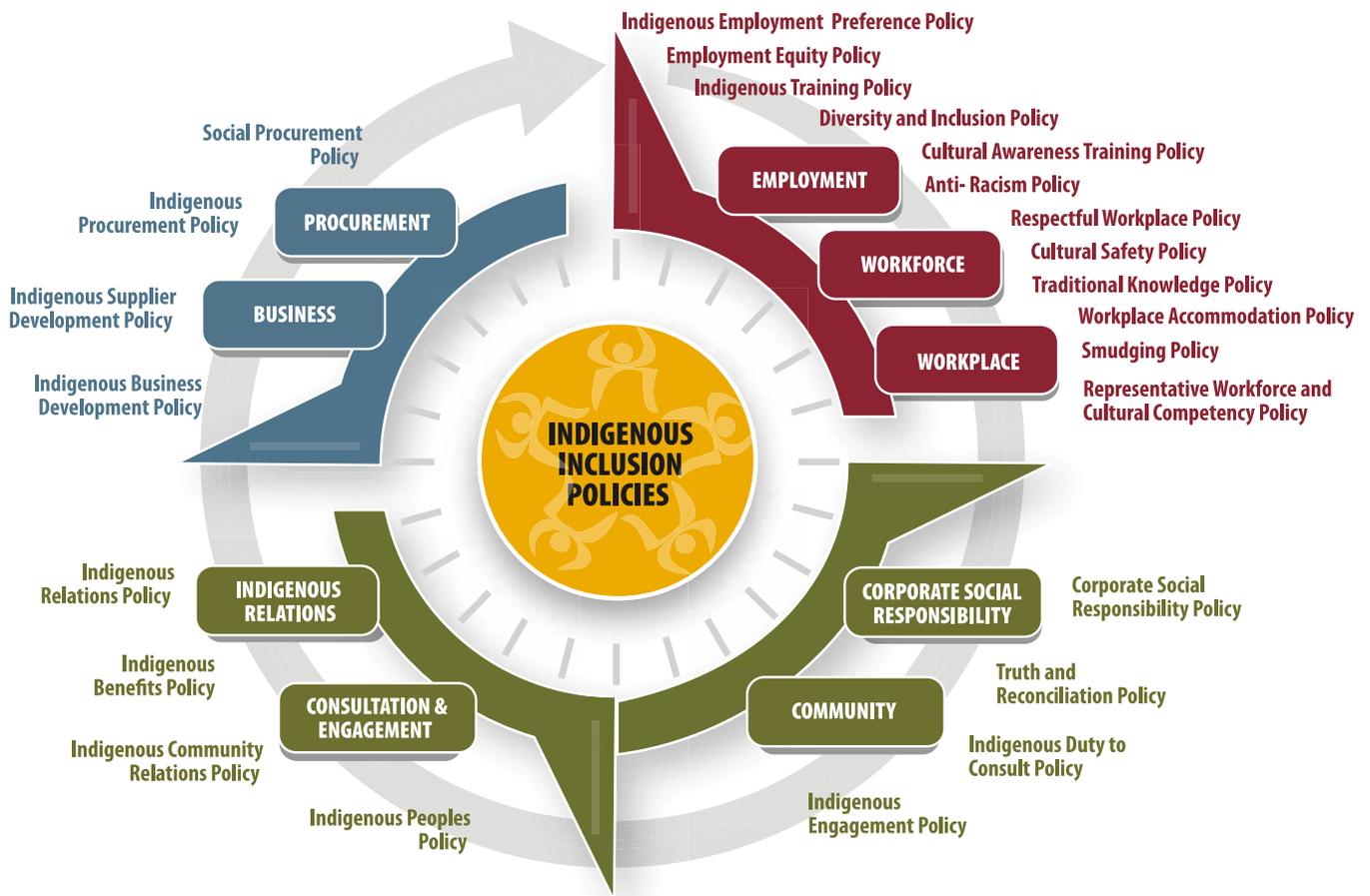
1. They guide organizational behaviours;
2. Define the resources with which organizational goals can be achieved;
3. Define roles and responsibilities in areas of business;
4. Help identify significant issues affecting organizational success; and
5. Define the scope or spheres within which decisions can be taken by subordinates in an organization.



TYPES OF INDIGENOUS INCLUSION POLICIES

There are quite a range of Indigenous inclusion policies in use by companies and organizations throughout Ontario and Canada. The diagram below illustrates how some of those policies align with workplace needs. Some inclusion policies have a targeted application to specific areas of the workplace such as employment, Indigenous community relations, Indigenous business development or procurement. Other inclusion policies strike across the organization, providing an 'enterprise-wide' approach to inclusion.

INDIGENOUS INCLUSION POLICIES



HOW TO DEVELOP AN INDIGENOUS INCLUSION POLICY

There are steps to developing Indigenous inclusion policies. The questions here will assist you and prompt you to start the process.

POLICY FORMATION

Questions to Guide the Policy Formation Process

- What are the top 3-4 issues that are driving the need for the policy?
- Is there uniform agreement on these issues throughout the company?
- Is there an area within the organization that these issues have surfaced?
- What are the top 3-5 principles that will guide the policy?
- What values does the organization hold as important?
- In what ways do these values inform the development of the new policy?
- What would the policy likely be called (e.g. "A Policy to...")?

Purpose of the Proposed Policy

- What is the internal business case for the policy and its adoption from the company's perspective? How important is this policy to the organization's corporate objectives and its bottom line?
- What is the purpose of the policy within the organization and externally?
- Who will use the policy? Who would be impacted and in what ways?
- What are the consequences of the company not developing and/or adopting the policy?

Policy Design

- What role will users have in shaping the policy?
- What are the implications of such a policy from the perspective of the stakeholders (e.g. employees, members, clients/customers)?

- What does it look like or how would I apply it at the board of directors' level, at the accounting level at the governance level and at the ground level?
- Is the policy to be directed to internal users, external users or both?
- Will the policy be enforceable or advisory in nature and what are the consequences of not following or deviating from the policy?
- What is your company or organization trying to change through the introduction of this new policy (e.g. exemplary practices, rebranding, attract a new target market, diversify employee demographics)?
- Will the policy be construed as the comprehensive statement of your organization's position or "stance" on Indigenous development issues?
- How will the policy be interpreted and implemented by employees, the Board, sub-contractors, etc.?
- Who will be responsible for implementing and reporting on the impacts of the policy?
- How accessible will the policy be? How visible will it be? Who will be able to change the policy?
- How will the policy be ratified? Who will do this?
- Would there be any parts of the company or organization to whom the policy would not apply (i.e. immunity vs. relevance)?
- What procedures, rules and controls will be needed to implement and support the policy?
- It is important to consult relevant business units within the organization about the development of the policy. In advance of its ratification, business units will need to consider the operational impacts that the policy may have. They may need to develop procedures to align with the policy needs. Consideration should be given to how this internal consultation should be undertaken.

Scope of the Policy

What kinds of subject matters would we expect to see in the policy?

- Indigenous employment within the company;
- Contracting and procurement practices;
- Commitment to Indigenous (community) development (sustainable development);
- Practices/approaches when dealing with Indigenous people (protocols that should/will be followed);
- Code of ethics/behaviours;
- Business development (encouraging and creating opportunities);
- Partnership opportunities; and
- There may be positions on specific issues that need to be highlighted or clarified in the policy. For example, a company may want to articulate its position on the opportunities for Indigenous people to build equity in development projects.

Implementation Mechanisms

- Sometimes policies will also include procedures (e.g. a manual, set of procedures, etc.);
- The document should state whether the policy is mandatory or not;
- It should refer to the organization's Code of Conduct or other such protocols/policies already adopted; and
- Will there be incremental resources needed to support the implementation of the policy?

Timing

- How soon does the policy need to be in effect?

Leadership

- Who within the organization takes the lead with the formation of the new policy? Who will be involved in its formation? Who will have input and how much input will they be afforded?
- What communications, if any, will be undertaken to inform groups that this policy is under consideration (e.g. client, shareholders, employees/sub-contractors)?

HOW AN INCLUSION POLICY CAN ADD VALUE TO YOUR BUSINESS

Companies tend to be somewhat advanced in their Indigenous inclusion strategies before they will adopt an Indigenous inclusion policy.

Once companies gain momentum they may adopt an inclusion policy as a way to solidify or consolidate their Indigenous engagement and inclusion planning and processes. A policy helps define your company as an employer of choice and gives you better opportunities to attract Indigenous people to your workplace. If the policy has even broader scope it can also define you as a company of choice with whom Indigenous businesses and organizations will want to do business and build broader and longer-term relationships.

The adoption of an Indigenous inclusion policy offers an important way for your company to convey that it has reached a level of maturity in its Indigenous engagements or relations. Ideally, the policy should signify that you have successfully integrated Indigenous inclusion principles into your core mission and business plan. This gives you credibility and reputational value. At the same time, it also defines some important commitments and accountabilities. A further benefit, the adoption of a policy is also a way for your company to achieve the internal coordination needed (e.g. people, resource allocation) to achieve your inclusion goals.

TIPS FOR COMPANIES FOR THEIR INDIGENOUS INCLUSION POLICY DEVELOPMENT

Before you begin, make sure that you have a plan in place to address some of the issues which tend to act as barriers to policies being adopted.

- Make sure your executive or senior leadership is on-board and have mandated the policy;
 - Define your business case for Indigenous engagement and inclusion. How will a new policy add value to your business?
 - Find a place in the organization from which to launch the policy. Will it be within human resources, business or within the executive itself? Which division or unit will 'own' or host the policy, drive it and ensure that the accountability needs are fulfilled?
 - Be able to explain how this new policy fits with other policies which your company currently has in place;
 - Is your company's policy development and approval process clear? Are there issues with the process itself that first need to be addressed?
 - Is your company going to be able to live up to its policy commitments? How will it be able to evidence that success?
 - Systems challenges may need to be addressed. For example, you may need to introduce changes to your employment systems so that your organization is able to effectively measure and track how many Indigenous people you currently employ. This may necessitate work with your technology staff or contractors to make these systems changes;
- Is the timing right for your company to adopt an inclusion policy or are there many other priorities and issues which are taking precedence or priority? Is now the right time to introduce an Indigenous inclusion policy?
 - Have you defined the right Indigenous inclusion policy for your company's needs? Do you want an employment policy or something that cuts across several functional areas of your organization (i.e. enterprise-wide)?
 - Is the language and purpose of the policy clear? Is there good understanding of management's and employees' roles in the policy and what tracking and reporting is needed?

A new Engagement Index developed by Indigenous Works scored Ontario's corporate/Indigenous engagements at only 8 out of 100. Moreover, most companies have no meaningful plans in place to work with Indigenous people, businesses or communities. The adoption of an Indigenous inclusion policy generally means that an inclusion strategy (or strategies) have already been adopted or developed.

Companies with higher scores on their Engagement Index tend to have more intentional and more sophisticated Indigenous strategies. Ask yourself these questions. "Is my company ready to engage with Indigenous people? Among other preparations, have we developed the right cultural competencies and educated ourselves about Indigenous people, their histories and outlooks?"

WHAT MAKES A GOOD INDIGENOUS INCLUSION POLICY?

The Advisory Committee for the Local Employment Planning Council's Indigenous Inclusion Policy Development Project were asked to provide their input on what makes a good Indigenous inclusion policy. The following are their recommendations:

1. Leadership needs to uphold the Indigenous inclusion policy. If someone within the business or organization transgresses the policy, there should be consequences. Otherwise, if the negative action or behaviour is condoned, then this serves to undermine the policy;
2. Policies should have the effect of creating standards in a business or organization. For example, a policy on Indigenous workplace inclusion or a respectful workplace policy should inform on what are acceptable behaviours, decorum and interactions between and among employees and management;
3. A company that adopts strong Indigenous inclusion policies should be celebrated. Its leadership and organization should be promoted as an example to other members of the business community. Government also needs to play a leadership role by adopting and enforcing strong Indigenous policies;
4. The best policies are those that act as a guide to measurable organizational behaviours or actions. Companies and organizations that adopt Indigenous inclusion policies do so for a variety of reasons. Is there a business case underlying the adoption of the policy? How does the policy support the businesses' or organization's goals?
5. There is a need for appropriate metrics to measure the effectiveness of the policy. Policies need an accountability framework. There needs to be clarity about whom within the organization is responsible for the effective implementation of the policy. What structures are put into place to ensure that adequate reporting and metrics are compiled? To whom is the company accountable in terms of effective implementation and measurable results? How often is reporting done on the policy and to whom?
6. What is the 'policy culture' in a business or organization? For some, policy plays a very important role in day-to-day operations. What measures are taken to ensure that adopted policies continue to be animated? What needs to happen at an organizational level to ensure that policies are 'active' and top of mind? Accountability is important throughout the organization;
7. It is important to communicate policies, both internally and externally. Policies can play a key role as a way for companies to position themselves with Indigenous communities. Companies that have strong Indigenous policies signal that they want to develop good Indigenous relationships. But these policies must be followed and enforced;
8. There may be different policies adopted to combat racism. Indigenous people can face racism on a daily basis. Some companies and organizations have adopted Anti-Racism Policies or Racism-Free Policies, Zero Tolerance Policies, or Respectful Workplace Policies. These are all examples of Inclusion policies.

SAMPLE TEMPLATES OF INDIGENOUS INCLUSION POLICIES

Here are five sample templates to give you an idea of what different Indigenous inclusion policies can look like. Each example provided addresses inclusion in different ways with varied emphasis on Indigenous employment, business or other intended outcomes. One is specific to a sector. Two are specific to workplace inclusion and promoting effective working arrangements for Indigenous people and in respect to teamwork and performance.

Note that while the objectives of these policies are different they share many of the same features in their composition.

- Goal or Position Statement (in one or two sentences what outcomes does the policy seek to achieve?);
- Principles (foundational principles on which the policy is founded);
- Scope (to whom in the organization does the policy apply?);
- Definitions (defining important terms used in the document);
- Authority and Accountability (who is responsible for the policy, areas of responsibility and accountability to ensure it is carried out successfully?);
- Relationship between this policy and others? (e.g. founding legislation);
- Policy Review (when will the policy be reviewed again?); and
- Reporting (what are the internal and external reporting requirements for the policy outcomes?).

Some policies are nothing more than aspirational goals or principles for an organization. Other policies provide the means of implementation to determine whether and how the outcomes intended by the policy are being achieved. Sometimes policies are accompanied by administrative procedures which speak to the details of its implementation within the organization.

TEMPLATE #1 – COMPREHENSIVE INDIGENOUS INCLUSION POLICY

TEMPLATE #2 – INDIGENOUS CULTURAL SAFETY – HEALTH SECTOR

TEMPLATE #3 – INDIGENOUS PROCUREMENT POLICY

TEMPLATE #4 – WORKPLACE DIVERSITY AND INCLUSION POLICY

TEMPLATE #5 – INDIGENOUS PEOPLES POLICY



STATEMENT OF PURPOSES

Company A is dedicated to growing and promoting exemplary relationships with Indigenous people, businesses and communities throughout Canada.

The Company wants to employ Indigenous people as well as conduct business with Indigenous entrepreneurs and Indigenous development corporations. Company A wants to enter into mutually beneficial joint ventures and partnerships as well as other agreements and understandings which bring value to the Company as well as to Indigenous people, businesses and communities.

Company A aspires to be an “Employer of Choice” with Indigenous people. The Company is dedicated to creating a workplace which is inclusive and honouring of Indigenous Peoples’ history, culture and heritage.

PRINCIPLES

Company A will adhere to the following principles in the implementation of its Indigenous Policy:

1. Respect and transparency are important in Company A’s discussions and transactions with Indigenous people, businesses and communities;
2. Trust is built and earned and stands as the foundation of any good relationship;
3. Business relationships and transactions must be fair and equitable for parties;
4. Company A will act with good will and intent in all of its Indigenous initiatives;
5. The Company will seek to be a model for exemplary Indigenous relations;
6. Indigenous employment practices will be characterized by fairness, reasonableness, and an absence of bias and harassment; and
7. The Company embraces diversity and inclusion as vital components of a successful, engaging and productive workplace.

SCOPE

This policy applies to all employees, divisions and business units within Company A in Canada as well as to Indigenous people, businesses and communities seeking to work with or grow relationships with the Company.

DEFINITIONS

Indigenous - In this policy ‘Indigenous’ refers to First Nations, Métis and Inuit Peoples.

Indigenous Business - means

- A business that is at least 51% Indigenous owned and controlled; or
- A business that has 6 or more full-time Indigenous staff members and at least one-third of employees are Indigenous;

Company – refers to Company A and its operations in Canada.

Division Indigenous Strategy – means a set of procedures that will be established by the appropriate business divisions or business units within the Company to achieve the purpose, planning and implementation of this policy. The procedures will describe the set of objectives, actions and operations that must be achieved and performed within a division or business unit. It describes the accountabilities, who is responsible for doing and reporting on those actions as well as when they occur. The procedures may include descriptions and other narratives which describe the systems needed to achieve the policy purposes within that business unit or division. These procedures become the standard.

Joint Venture: A joint venture can consist of two or more Indigenous businesses, or an Indigenous business and one or more non-Indigenous businesses, provided that in all cases the Indigenous business[es] own and control at least 51% of the joint venture.

PROVISIONS

1. Authority and Accountability

- Company A's Executive approves the Indigenous inclusion policy for the Company and delegates additional authorities as needed;
- Company A's Executive approves any financial resources needed to support this policy;
- Senior VP's of the Company's business units are responsible for implementing strategies (Division Indigenous Strategies) that assist in meeting the purposes, planning and implementation of this policy;
- The Vice President of Indigenous Relations is responsible for:
 - Creating and maintaining the Guidelines for different business Lines or Divisions within the company and their respective Indigenous Strategies. The Guidelines include the format, standards and criteria to be used;
 - Completing an Annual Public Roll-up Report of all Indigenous transactions and initiatives in Canada completed under the intent of this policy;
 - Working with senior managers to ensure that their respective Unit's or Division's Indigenous Strategies conform to the approved Guidelines.

2. Planning and Implementation

- i) This policy will guide the activities of different divisions and business units within the Company in helping to achieve the purposes of the Indigenous policy.
 - Schedule 1 - Indigenous Business Development
 - Schedule 2 - Indigenous Employment (See description below)
- ii) [a] Communications and promotional activities will be undertaken in order to build understanding of this policy and its purposes:
 - Internally
 - Externally (general public)
 - Stakeholders (e.g. Company subcontractors)
- [b] Company A will produce a Public Annual Report which details the work undertaken by the Company in the previous year to support this policy and its purposes.
- [c] The Company may periodically make gifts or donations to Indigenous people, businesses or communities, in alignment with its corporate social responsibility guidelines.



SCHEDULES

Schedule 1 - Indigenous Business Development

The Company will undertake the following:

- Encourage Indigenous business participation in its supply chain;
- Encourage opportunities for qualified Indigenous businesses to supply goods and services to the Company;
- Implement an Indigenous Supplier Development Program;
- Track and monitor purchases from Indigenous businesses;
- Enter into partnerships with Indigenous groups and organizations with the express purpose of forming an Indigenous joint venture;
- Establish Guidelines to encourage and support the Company’s non-Indigenous subcontractors to increase their Indigenous employment and purchases;
- Enter into agreements with Indigenous groups, organizations and businesses for the purpose of achieving specific business objectives.

Schedule 2 - Indigenous Employment

Company A will undertake the following:

- Actively recruit Indigenous people to the Company;
- Encourage a workplace culture of teamwork and cooperation by providing Indigenous Awareness Training, diversity training, or similar kinds of training;
- Encourage and foster an inclusive workplace which recognizes Indigenous culture, history and heritage;
- Implement training programs for the purpose of advancing Indigenous employees in accordance with their experience, interests and qualifications and as business conditions for the Company allow;
- Track and monitor Indigenous employment numbers.



OVERVIEW

Company B recognizes that Indigenous people are underrepresented in its workforce. Company B equally recognizes the importance of diverse ethnic groups and their role/importance in a representative workforce. However, Indigenous people are significantly underrepresented. Focused strategies are needed to build a culturally safe environment and representative workforce including cultural competencies, recruitment, retention, education, partnerships and communication. These strategies focus on, but are not limited to Indigenous people.

DEFINITIONS

In this policy, **Indigenous** refers to First Nations, Métis and Inuit peoples.

All staff means Company B’s employees, practitioners, professional staff, contractors, vendors, students and volunteers.

Cultural competency means a set of congruent behaviors, attitudes and policies that come together in a system, agency or profession that enables that system, agency or profession to achieve cultural diversity and to work effectively in cross-cultural situations.

Cultural safety exists when an environment is created and respected and where people, customers and workers feel safe, understood and respected to optimize the customer experience.

First Nation includes any of the Indigenous peoples or Indian communities of Canada, especially one formally recognized by the Canadian Government.

First Nations include:

- Status (registered) treaty Indians;
- Non-status (unregistered) Indians.

Inuit are Indigenous people of the Canadian arctic. The arctic is divided into territories: Nunavut, Yukon and Northwest Territories along with Northern Quebec and Northern Labrador.

Métis are descendants of First Nation and European heritage. Métis people are defined under the Métis National Council as a person

who self-identifies, who is of historic Métis ancestry and/or belong to a Métis local or is accepted as Métis by the Métis Nation.

Persons with Disabilities is an individual who has a long term or reoccurring physical, mental, sensory, psychiatric or learning impairment and;

- Considers themselves to be disadvantaged in employment by reason of that impairment;
- Believes that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment; and
- Includes persons whose functional limitations owing to their impairment have been accommodated in their current job or workplace.

Partnerships refer to a relationship involving the sharing of power, work, support, resources and/or information of others for the achievement of joint goals and/or mutual benefits.

Representative workforce means a workforce where all levels of the organization reflect the diversity of the community served and where individuals who are underrepresented in the workforce have equitable access to employment.

Self-identified staff are those who have voluntarily declared that they consider themselves to be in a designated Equity Group as defined by the Ontario Human Rights Commission these equity groups are Indigenous, Visible Minority, Women and Persons with disabilities.

Visible Minorities are persons other than Indigenous peoples, who are non-white in color/ race regardless of their place of birth.

PURPOSE

The purpose of this policy is to establish Company B’s’ position regarding representative workforce, cultural competency and cultural safety within Company B.

PRINCIPLES

- A representative workforce must be at the level of representation of the diversity of the community/population served;
- Cultural competency must be embedded in workplace culture, practices and beliefs in order to serve staff, patients, customers, clients, residents and families of Company B;
- Company B recognizes the interconnectedness between a representative workforce and cultural competency regarding the provision of culturally safe, quality healthcare service to a diverse client base; and
- Company B recognizes the importance of partnerships with organizations committed to establishing a workforce that is representative of the community served.

POLICY

- Company B is committed to building a workforce that is representative of the community served in order to provide quality, client-centred experiences to patients, customers, clients, residents and families.
- Company B’s representative workforce strategies focus on, but are not limited to Indigenous peoples.
- Company B shall ensure an organizational strategy is implemented to build a representative workforce that will:
 - Enhance organizational cultural competency;
 - Increase self-identified staff;
 - Decrease self-identified staff turnover by increasing Indigenous retention rate;
 - Enhance internal and external positive cross-cultural relations.

ROLES AND RESPONSIBILITIES

All Staff

- Promoting, creating and maintaining a culture of inclusiveness and respect for diversity.

Managers/Supervisors

- Foster and promote a workplace environment that is sensitive and supportive of representative workforce activities and initiatives.

Policy Management

- The management of this policy including policy education, monitoring, implementation and amendment is the responsibility of the Director, Representative Workforce and Indigenous Health.

Non-Compliance/Breach

- Non-compliance with this policy will result in an investigation. Repeated non-compliance may result in disciplinary action, up to and including termination of employment and/or privileges with Company B.

PURPOSE

Company C will work with Indigenous communities to promote economic development through the identification of opportunities that offer Indigenous communities and businesses the ability to participate in the procurement of goods and services in support of Company C’s operational and project requirements.

PRINCIPLES

Company C promotes open and transparent consultation and communication and strives to build lasting relationships with Indigenous communities and businesses. Company C is committed to ensuring these relationships are based on trust, mutual respect and the achievement of common goals.

Company C has dedicated personnel who connect Indigenous companies with Company C’s procurement opportunities and provide advice, information and materials to help Indigenous businesses in the following ways:

- Assist in identifying procurement and economic development opportunities;
- Assist in identifying the processes used to procure goods; and
- Build procurement bidding expertise to assist with the Company C’s bid process.

INDIGENOUS BUSINESSES

Increasing Indigenous participation in the procurement of goods and services is a key goal of Company C. Procurement through direct awards, select tenders and specified Indigenous content in bid documents where appropriate will enable us to realize this goal. To ensure that procurement practices are consistent with our goals, the following criterion is utilized to qualify Indigenous businesses:

- Sole proprietorships - business must be wholly owned by an Indigenous person;
- Limited company - business must have at least 51 percent of the equity (including any common or voting shares) owned by one or more Indigenous Businesses or Indigenous People;
- Partnership or joint ventures - business must have at least 51 percent ownership rights

(including any voting rights) directly held by one or more Indigenous Businesses or Indigenous People; and

- As determined by Company C in its sole discretion from time to time, any other businesses with a substantial amount of ownership rights held by one or more Indigenous businesses or Indigenous people.

PROCUREMENT PRACTICES

To ensure opportunities are extended to Indigenous communities and businesses, the following procurement practices may be utilized, as applicable:

- **Direct awards** – a contract for goods or services that is awarded on an open book basis or without a request for proposal or special requirements for tender basis;
- **Limited competitive bidding** – a bid where there is an acknowledged number and/or capacity of Indigenous businesses in a particular commodity or service area, and where fair market value is achieved, Company C may establish a competitive Indigenous procurement process where only qualifying Indigenous businesses will be requested to bid on the procurement. This can include limiting the number of invitations with a minimum of at least three invitations; and
- **Inclusion of Indigenous content** as a component of the bid evaluation criteria-select Company C procurement opportunities may be required to include an Indigenous Opportunities Requirement (IOR). The IOR requires that bidders include, in their bid documents, a plan to ensure that an awarded contract must include specified Indigenous participation and benefits as measured in direct or indirect Indigenous content value.

This flexible tool allows non-Indigenous companies to provide benefits to Indigenous peoples and communities, assisting Company C to meet its Indigenous participation objectives, through a range of options including training, employment, procurement, contributions to Indigenous youth and other programs as specified by the company. Regardless of the practice used for procurement, Company C will always seek competitive market-based costs and will not compromise safety, the environment, quality or schedule.

STATEMENT OF PURPOSE

Company D is committed to providing a workplace which promotes innovation and creativity through our diverse and inclusive talent pool. Company D aims to ensure that all those participating in our workplace are treated with respect, dignity and fairness with an aim of creating an environment which promotes positive working relationships. This policy is designed to ensure that all employees understand Company D’s commitment to recognizing the value of diversity in our workplace as supported through equal employment opportunities and ensuring work practices promote equality and are non-discriminatory.

SCOPE

This policy applies to employees as well as contractors acting on behalf of Company D.

DIVERSITY AND INCLUSION

Company D recognizes that all people bring different qualities, abilities, skills, knowledge, experiences, perspectives and attitudes to work. Valuing and making the most of these differences can improve the workplace for individuals and enhance Company D’s overall performance.

We understand diversity as 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, language, physical and intellectual ability, race, religion, sex, sexual orientation and socio-economic status.

RECRUITMENT AND SELECTION

Company D recognizes the value of diversity in our workplace and strives to promote fairness and equal employment opportunities. The decision to employ or engage an individual is based on merit, the potential and the ability to carry out the role. Company D seeks to address

conscious and unconscious bias in recruitment through a panel interview, with the involvement of the Human Resources Manager in the process.

CAREER DEVELOPMENT AND SUCCESSION PLANNING

Company D is committed to identifying and implementing programs that will assist in the development of a broader and more diverse pool of skilled and experienced employees. Company D seeks to develop its officers, employees and contractors to prepare themselves for higher levels of responsibility by offering equal opportunities for career development based on knowledge, skills and leadership prospects for future success. Internal promotions and our employee recognition program are widely encouraged as a development as well as a retention strategy.

EXPECTED BEHAVIOUR AND CODE OF CONDUCT

Company D values a workplace culture that is respectful of inclusion and diversity. There is zero tolerance for bullying, discriminating, harassing victimizing or vilifying behaviours. This is achieved through continuously educating our employees and contractors on the standards Company D expects of its employees.

FLEXIBLE WORKING ARRANGEMENTS

Company D acknowledges that the needs of employees change during different stages of life with different family support and care requirements. As such, Company D offers the opportunity to work part-time or with flexible start and finish times (in agreement with the manager) and the adoption of other supportive practices that enables employees to achieve work-life balance. Employees returning from parental leave have the right to request flexible working arrangements and Company D will give careful consideration to come to an arrangement that balances both the needs of the employee and the business.

TEMPLATE 4

WORKPLACE DIVERSITY AND INCLUSION POLICY

BREACH OF POLICY

All individuals covered by this policy are expected to adhere to the standards of behaviour contained herein, at all times. Any employee or contractor, who is found to have breached this policy will be disciplined accordingly, which may lead to, and include termination of employment or engagement.

MEASURABLE OBJECTIVES

Each year a Policy Committee will establish or review measurable objectives for achieving the goals of this policy.

REPORTING

Each year a Policy Committee will develop a report about the outcomes achieved under this policy.

TEMPLATE 5

INDIGENOUS PEOPLES POLICY

Company E is committed to engaging with Indigenous communities where we have activities. Meaningful engagement and consultation begin with respecting the rights of Indigenous peoples, whose legally recognized lands and traditional territories are within or in close proximity to the areas where we operate.

We engage early and often with communities to build solid relationships based on mutual trust and respect of customs and culture, a shared understanding of issues, transparency, inclusiveness, two-way dialogue, and collaborative problem-solving to achieve mutually satisfactory outcomes.

The intent of our Indigenous Peoples Policy is to guide development of these relationships over the lifecycle of our projects. It reinforces Company E's commitment to foster opportunities for Indigenous people to participate in the economic, environmental and social benefits of Company E's community developments, ensuring these benefits reflect community interests and our commitment to responsible development.

The policy also focuses our work with Indigenous communities in four key areas:

- Engagement and consultation;
- Business development and capacity building;
- Indigenous employment; and
- Community investment.

It also contributes to our efforts to ensure consistent practices and high standards in engaging Indigenous peoples across our operations.

GUIDING PRINCIPLES

- The traditional cultures, land uses, customs, knowledge and integrity of Indigenous people;
- Open and transparent two-way dialogue with Indigenous people; and
- Building and sustaining long-term relationships with Indigenous people that span the project lifecycle;

WE RESPECT

- The rights and traditional decision-making of Indigenous people;
- The need for honest and fair dialogue with Indigenous peoples regarding both the impacts of Company E's operations and our ability to respond to their interests and aspirations; and
- The need to build our social license to operate with Indigenous people.

WE ARE INCLUSIVE

- In consultation and engagement activities to ensure the voices of the leadership, elders, youth and community members are heard; and
- In promoting education, employment, community investment and economic development opportunities for Indigenous people.

WE ACT WITH INTEGRITY

- Company E does what we say we will do.

YOUR INDIGENOUS INCLUSION POLICY WILL DISTINGUISH YOUR COMPANY

Few companies have adopted an Indigenous inclusion policy. This is partly because there are few resources available to help companies get started on one. This Guide was intended to point companies in the right direction by providing some of the rudiments of policy formation as well as examples of inclusion policies. As you think about whether an Indigenous inclusion policy is right for your company, you will need to consider whether and how it will support your inclusion strategy or strategies. There are a variety of considerations to think about. Your policy journey is important to your company, just as it is to Indigenous people. Be assured that if you are successful in adopting a meaningful Indigenous inclusion policy, it will distinguish your company for its leadership role in seeking to define its relationship with Indigenous people, businesses and communities.



Local Employment
Planning Council
Conseil local de planification
en matière de l'emploi

For more information about this project contact your Local Employment Planning Council or visit our website at www.nswpb.ca/lepc



Indigenous Works was the consultant hired to work in partnership with the Local Employment Planning Council to complete this project. For more information about Indigenous Works go to www.indigenousworks.ca

 **Indigenous Works**