Inclusivity Assessment

Part 2 › Review of Student Policies, Programs, and Services

TABLE OF CONTENTS

EXECUTIVE SUMMARY

This Inclusivity Assessment report is the product of five months of work by the consulting team to review and analyze Lambton College's programs and services in order to identify and make recommendations for the delivery of equitable services to its diverse student body.

Given the increasing diversity of the provincial population and Lambton's recruitment of international students, curriculums and student programs and services that reflect and serve the needs of all students cannot be left to chance. More and more post-secondary institutions across Canada are recognizing that in order to be an institution of choice, a leader in research, and a good community partner, diversity, equity, and inclusion must be boldly, deliberately, and thoughtfully incorporated into all aspects of an institution's work.

To create an inclusive organization, leaders must demonstrate personal commitment and courageously lead students, staff, and faculty on this journey. All members of the college community must be tenacious in committing their time and energy to guiding and nurturing students, participating in learning opportunities, and applying their learnings to how they interact with learning and working environments. This journey requires patience, a commitment to ongoing learning, as well as discussions and actions that challenge the status quo, question the wordviews of individuals, and reconsider approaches to teaching and learning. This work must be seen as an "add-in" rather than an "add-on" to existing work, with the understanding that this journey is ongoing and not a one-time initiative.

This Inclusivity Assessment consists of two parts. The first part focuses on equity, diversity, and inclusion in the workplace and the experiences of Indigenous employees and employees from the equity-seeking groups (i.e., women, racialized employees, persons with disabilities, and 2SLGBTQ+ employees).

This report, the second part of the Inclusivity Assessment, summarizes the findings from the review of the College's student-focused policies, programs, and services through an equity lens. The purpose is to identify barriers to achieving an equitable and inclusive learning environment for Indigenous students and students from the equity-seeking groups (i.e., women, racialized students, international students, persons with disabilities, and 2SLGBTQ+ students).

The results of both parts of the Inclusivity Assessment form the basis of Lambton's Inclusivity Strategy, the third document in this series.

Methodology

The Ontario *Human Rights Code* ("the Code") requires that Lambton College provide non-discriminatory education services, maintain a harassment-free learning environment, and provide accommodation based on any human rights protected ground, short of undue hardship. Additional equity-related requirements are set out in the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), which includes a number of standards to ensure that persons with disabilities have access to the same services as persons without disabilities.

To conduct this audit, student policies and procedures were reviewed against the following criteria:

- **Legal compliance:** to ensure compliance with equity-related legislation such as the Ontario *Human Rights Code* and AODA

- **Adverse impact:** to assess whether they have a disproportionately negative impact on Indigenous students and students from the equity-seeking groups

- **Accommodation:** to assess whether policies and procedures reflect the varying needs of students from diverse communities, backgrounds, and identities and provide the needed accommodation, and

- **Inclusive:** to assess whether policies and practices support the full inclusion of all students.

The research team explored any equity issues that arose in the course of conducting this Inclusivity Assessment. While this review focuses on the issues affecting Indigenous students and students from the equity-seeking groups because they face persistent and systemic discrimination in access to education, the removal of barriers to programs and services will create truly inclusive services that benefit all students.

The Inclusivity Assessment blends the collection and analysis of both qualitative and quantitative data through the following methods:

- Review of policies and related documents

- Focus groups and an online survey in which 215 students and 261 employees participated, and

- One-on-one telephone interviews with stakeholders.

Key Issues Identified

During the focus groups and interviews, students identified many positive aspects of the College, including:

- Inclusive, welcoming, and helpful staff and faculty
- An accessible campus

- Campus events, including cultural events, competitions, movies, site seeing, clubs, and volunteer opportunities, and
- A range of programs, many of which include practicums and co-op opportunities.

In addition, the following issues and gaps were identified through this audit:

Indigenous students

- Professional development regarding reconciliation is not mandatory for faculty and staff
- Learning about Indigenous Peoples is not mandatory for students
- There are very few Indigenous staff and faculty
- Student experiences of anti-Indigenous racism from other students and faculty

2SLGBTQ+ students

- Lack of 2SLGBTQ+ visibility on campus
- No consisent 2SLGBTQ+ student club
- Discriminatory attitudes by faculty, embedded into curriculums and in the Sarnia community

Students with disabilities

- Discriminatory attitudes by other students and faculty
- Issues receiving educational accommodation
- Accessibility concerns across the campus

Racialized domestic students

- Lack of representation among students, staff, and faculty

International students

- Experiences of racism and discrimination from students, staff, faculty, and members of the Sarnia community
- Difficulty accessing housing
- Limited programs, services, and food options that are culturally appropriate
- Separate programs and courses
- Perceptions of lack of academic integrity
- Location and appearance of the prayer space
- Lack of consideration of non-Christian holy days when scheduling tests and other activities

Women

- Discriminatory attitudes from other students and faculty

- Safety concerns in classrooms, on campus, and in the Sarnia community

- Lack of attention paid to and repercussions for sexual harassment and sexual violence

- Lack of accommodation for family responsibilities

It is important to note that resistance to equity was also expressed by a number of students. They shared their belief that the focus on Indigenous students and students from the equity-seeking groups is an attack on their rights. Some also expressed that they feel excluded because of the diversity on campus.

The Road Ahead: Priority Areas

Both parts of this Inclusivity Assessment have identified equity, diversity, and inclusion issues and gaps that fall into six key priority areas. These priority areas are the high-level "what" that will inform the Inclusivity Strategy and form the basis of Lambton's Inclusivity Action Plan:

- Indigenize Lambton spaces

- Foster more inclusive, equitable, diverse, and accessible working and learning environments

- Increase diversity of staff and faculty

- Develop inclusive curriculums, and support faculty's ability to teach and support students from diverse communities, backgrounds, and identities

- Provide more responsive student programs and services, and

- Embed inclusivity into community connections and partnerships.

PART A: INTRODUCTION

1. Background

As part of its commitment to creating more equitable, diverse, and inclusive learning and working environments, Lambton College (the College/Lambton) contracted with Turner Consulting Group to conduct an Inclusivity Assessment consisting of two parts. The first part focuses on equity, diversity, and inclusion (EDI) in the workplace and the experiences of Indigenous employees and employees from the equity-seeking groups (i.e., women, racialized employees, persons with disabilities, and 2SLGBTQ+ employees).

This report, the second part of the Inclusivity Assessment, focuses on reviewing the College's student-focused policies, programs, and services through an equity lens. The purpose is to identify barriers to achieving an equitable and inclusive learning environment for Indigenous students and students from the equity-seeking groups (i.e., women, racialized students, international students, persons with disabilities, and 2SLGBTQ+ students).

This report summarizes the findings from the review of student policies, programs, and services and provides recommendations to remove the barriers and address the issues identified. This Inclusivity Assessment focuses on the Sarnia campus.

The results of both parts of the Inclusivity Assessment form the basis of Lambton's Inclusivity Strategy, the third document in this series.

2. The Context

Lambton College serves a diverse domestic student population and an increasingly diverse international student population. The College has three campuses. The primary location is in Sarnia, with campuses for international students in Mississauga, Toronto, and China.

The College had a fall 2021 enrollment at its main campus of about 1,900 domestic students, including about 130 self-identified Indigenous students and just over 2,000 international students. Approximately 800 staff and faculty provide a range of programs and services and educate these students.

All Ontario post-secondary institutions are recognizing the need to address issues of EDI if they are to continue attracting, retaining, and meeting the needs of the best and brightest students, staff, and faculty. As such, addressing issues of EDI in the learning and working environments is now recognized as not simply something that is a "nice to do" or a matter of compliance with equity-related legislation. Instead, it is the smart thing to do, seeing as it impacts an institution's ability to attract and retain the best staff and faculty, educate an

increasingly diverse student population, prepare students to work in an increasingly global and diverse labour market, and foster creativity and innovation.

A number of factors impact the context within which the College operates and drive the need to focus on EDI.

2.1   The City of Sarnia

The city of Sarnia has a population of over 74,000, with a regional population of 131,834 people.

The Sarnia-Lambton area is the birthplace of commercial oil in North America and remains the site of one of the largest petrochemical complexes in Canada. Its industrial history, infrastructure, strategic location, and highly trained workforce have enabled it to become the largest biochemical cluster in the country.[1]

Data from the 2016 Census shows that the city has an aging population, with those over age 65 outnumbering children under age 15 (15,390 and 10,785, respectively).[2] The median age for residents of Sarnia is 45. Between 2001 and 2016, the population of the city of Sarnia grew by only 1% (from 70,876 to 71,594), while the population has declined between 2011 and 2016, dropping from 72,366 to 71,594.

The city has an immigrant population of 8,725, representing 12% of the population. The majority (5,380, or 62%) arrived before 1981, and only 480 (6%) arrived between 2011 and 2016. The top source countries of immigrants arriving between 2011 and 2016 include the United States, India, United Kingdom, Iran, Syria, Iraq, China, Philippines, and Congo.

In addition, 2,785 Indigenous people live in Sarnia, representing 4% of the population. Three First Nations communities are located approximately a half hour from Sarnia: Aamjiwnaang; Kettle and Stony Point; and Walpole Island. An additional three First Nations communities are approximately an hour's drive from the city: Oneida Nation of the Thames; Chippewas of the Thames; and Moravian of the Thames.

Seven percent of the city population is racialized (4,720 people), with South Asians (1,225), Black people (1,010), and Chinese (570) representing the largest groups.

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[1] City of Sarnia. (n.d.). *Economic development*. https://www.sarnia.ca/business-planning-and-development/economic-development/

[2] Statistics Canada. (2016). *Census profile, 2016 Census*. https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/details/page.cfm?Lang=E&Geo1=POPC&Code1=0737&Geo2=PR&Code2=48&Data=Count&SearchText=Sarnia&SearchType=Begins&SearchPR=01&B1=All

2.2   Commitments to inclusion, equity, diversity, and accessibility

Lambton College's strategic plan articulates the vision as follows:

> A leader in education and applied research, challenging boundaries in a world shaped by the Fourth Industrial Revolution

The achievement of this vision is supported by the values of innovation, caring, quality, vitality, and diversity. The strategic plan also includes a commitment to preparing students to succeed in a world of constant economic, environmental, and social change. Identified priorities are as follows:

- Excellence in teaching and learning equips students to be agile and flexible in pursuit of career aspirations
    - Learning environment encourages collaboration, curiosity, and imagination
    - Diverse array of technology-enhanced and experiential learning opportunities
    - Quality academic programs prepare highly skilled graduates for a world of rapid transformation
- An exemplary student experience
    - Student services designed and delivered with a student-first philosophy, recognizing the importance of mental and physical wellness on student success
    - Underrepresented student populations welcomed and supported
    - A comprehensive student life experience, contributing to long-term affinity to Lambton College
- Campuses that spark learning, collaboration, and community engagement
    - Learning environments promote innovative teaching and learning practices
    - Campus environments promote social connections and engagement among diverse groups
    - A welcoming and sustainable environment that interconnects within the community

2.3   Accessibility

The AODA was established to make goods, services, and facilities accessible to all persons with disabilities in all public, private, and not-for-profit sectors in Ontario by January 1, 2025. The following are in place to help Lambton meet its obligations under the AODA:

Multi-year Accessibility Plan: The Multi-year Accessibility Plan is reviewed annually by the AODA Steering Committee.

College AODA Committee: The College AODA committee consists of various employees who represent key areas accountable for accessibility initiatives.

Accessible Student Services:

- Redevelopment of the majority of all Accessibility Services' systems and delivery formats/mechanisms in order to deliver all accessibility services remotely, in a digital environment, during the pandemic

- Building a new institutional website to provide students with streamlined access to information and registration, facilitating access to service and simplifying/expediting registration in Accessibility Services

- Further expanding Peer Note-Taking services with computerized notetaking support, increased communications and resources to improve accommodated notetaking service support, and added staffing

- Increasing funding support for student mental health and assessment needs

- Digital enhancement of the accommodated test booking system for students and faculty to provide greater access and efficiencies of service, and

- Approval of the expansion of testing facilities to allow for increased demand for accommodated testing.

Accessible Formats and Communication Supports:

- The continued commitment to arranging for accessible formats and communication supports (upon request) in a timely manner.

Facilities Management: With new buildings under construction, the Facilities Department continues to comply with the Built Environment Standard, with a focus on the new standards for public spaces and modifications to existing structures.

Teaching & Learning Commons: The College continues to work with College Libraries Ontario and the Ontario Colleges Library Service to acquire visual media and digital content. The College also continues to respond to alternative format requests of library materials to registered students, faculty, and staff with a perceptual disability through the Accessible Content E-portal (ACE) system

2.4 Commitments to Indigenization and decolonization

Through the Truth and Reconciliation Commission report, Canada has acknowledged the injustices of the residential school system and committed to addressing the structural and systemic racism that Indigenous Peoples continue to experience, including within the education system. The Province of Ontario has made acting on the Calls to Action in the Truth and Reconciliation Commission report a priority. The Ontario government released "The

Journey Together," a blueprint for reconciliation with Indigenous Peoples.[3] This work includes a commitment to closing the achievement gap and increasing Indigenous post-secondary education and training.

Lambton's commitments to advancing Truth and Reconciliation in collaboration with Indigenous communities are written directly in the College's Strategic Plan (2019–2024). These commitments include enhancing Indigenous student engagement, as reflected in improved access, retention, graduation and employment rates; embedding Indigenous culture and history in all post-secondary program curriculum; and reflecting culturally Indigenous perspectives, art, and traditions on campus.

The College recently formed a Truth and Reconciliation Committee that has been tasked with (1) considering the recommendations of the Truth and Reconciliation Commission of Canada and the Calls to Action along with other pertinent documents and reports and (2) developing recommendations to advance Truth and Reconciliation at Lambton.

In addition, in 2015, the College signed the Colleges and Institutes Canada Indigenous Protocol. By signing this protocol, the College has committed to seven principles, including the following student-focused commitments:

- Commit to making Indigenous education a priority
- Implement intellectual and cultural traditions of Indigenous Peoples through curriculum and learning approaches relevant to learners and communities
- Support students and employees to increase understanding and reciprocity among Indigenous Peoples and non-Indigenous people, and
- Establish Indigenous-centred holistic services and learning environments for learner success.

2.5   COVID-19 pandemic

This Inclusivity Assessment was conducted during the winter term of 2021, in the third school year impacted by the COVID-19 pandemic. The campus was closed or had limited in-person classes during much of the past three school years. Both staff and students have had to adapt to online learning, and to working and studying from home.

International students were particularly impacted, as they needed to undergo a 14-day quarantine in a hotel upon arrival in Canada, and then had to adjust to life in a new country while engaging in their studies. Many international students were not able to travel for their

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[3] Government of Ontario. (2017, September 28). *The journey together: Ontario's commitment to reconciliation with Indigenous Peoples*. https://www.ontario.ca/page/journey-together-ontarios-commitment-reconciliation-indigenous-peoples

education and have engaged in online learning while remaining in their home countries. All students were impacted by the isolation owing to lost social life and lost income due to lost job opportunities. With the vaccine came the requirement for all staff, faculty, and students to be vaccinated if they were to come to campus.

To support students who are struggling with food security, the Student Administrative Council partnered with The Lambton College Foundation to provide more than 2,500 healthy meals as well as boxes of fruits and vegetables and grocery store gift cards to their fellow students.

Even before the pandemic, post-secondary students faced high levels of mental health concerns.[4] This is partly because mental health challenges tend to emerge during young adulthood (from age 16 to 25)—the age of most post-secondary students. The pandemic has exacerbated these concerns. While they have been tending to their own mental health and caring for their families, College staff and faculty have had to shift to online teaching and remote working while responding to the increased needs of students.

2.6   Internationalization

The College continues to recruit international students in support of a sustainable College enrollment and the community's immigration strategy. In the coming years, the enrollment of international students on the main campus will increase to 2,100 students per year.

As part of the community-driven Local Immigration Partnership's Settlement Strategy under the Facilitation Pillar, activities are held to increase connections between the College's international students and services in the community. There are also activities organized to educate residents of Sarnia about the services offered to international students and to ensure that international students studying at the College feel safe, secure, and welcomed in Lambton County.

2.7   The demographic context

The following demographic and social trends are impacting the diversity of the post-secondary student population and shaping the issues of EDI that post-secondary institutions are challenged to address.

Large and diverse immigrant population. With a declining birth rate, Canada relies on immigration for population and labour market growth. As such, the country's immigration targets remain high. Immigration targets ranged from 240,000 to 265,000 between 2007

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[4] Centre for Innovation in Campus Mental Health. (2021). *The impact of COVID-19 on post-secondary institutions*. https://campusmentalhealth.ca/wp-content/uploads/2021/06/CICMH_COVID-19_Impact_Infosheet_EN.pdf

and 2011. The annual immigration target has progressively increased over the years and is currently at 401,000 new permanent residents for 2021.[5]

In the 1960s, Canada removed country-based restrictions from its immigration policies, which were designed to severely restrict the number of immigrants from non-European countries. Since those changes came into effect, the proportion of immigrants from outside of Europe has increased steadily. The population of newcomers to Canada is now increasingly made up of people from diverse racial, ethnic, linguistic, and religious backgrounds. While Canada received immigrants from over 200 source countries between 2011 and 2016, the majority of newcomers to Ontario during that period came from these top 10 source countries: India, China, Philippines, Pakistan, Iran, Iraq, United States, Egypt, Bangladesh, and United Kingdom.[6]

Recognizing that international students are a valuable and highly educated source of immigrants, the Government of Canada offers a number of pathways for them to remain in Canada after they have completed their studies.

Increasing racial, cultural, and religious diversity. Fuelled primarily by immigration, the 2016 Census data highlights the dramatic demographic changes that Ontario has undergone and that are expected to continue in the coming years:[7]

- 1.2 million immigrants arrived in Canada between 2011 and 2016, with about 40% of these newcomers (472,170) settling in Ontario
- 29% of Ontario residents were born outside of Canada, and
- Racialized[8] people made up 29% of Ontario's population.

With Canada's continued reliance on immigration for population and labour market growth, the Toronto census metropolitan area (CMA) will become increasingly racially, culturally,

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[5] Statistics Canada. (2020). *Notice—Supplementary Information for the 2021–2023 Immigration Levels Plan*. https://www.canada.ca/en/immigration-refugees-citizenship/news/notices/supplementary-immigration-levels-2021-2023.html

[6] Statistics Canada. (2016). *Census profile, 2016 Census*. https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/details/page.cfm?Lang=E&Geo1=PR&Code1=35&Geo2=PR&Code2=01&SearchText=ontario&SearchType=Begins&SearchPR=01&B1=All&TABID=1&type=0

[7] Statistics Canada. (2016). *Census profile, 2016 Census*. http://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/index.cfm?Lang=E

[8] The term "racialized" is used throughout this report to replace the term "visible minority" used by Statistics Canada. This definition includes those who self-identify as South Asian, Chinese, Black, Filipino, Latin American, Arab, Southeast Asian, West Asian, Korean, Japanese, mixed race, and others who identify as non-White and non-Indigenous.

linguistically, and religiously diverse. Statistics Canada data shows that between 2006 and 2016, the racialized population in Ontario grew by 42% (from 2,745,200 to 3,885,585), while the total population of Ontario grew by 11% (from 12,160,282 to 13,448,494). As such, the racialized population in Ontario increased from 23% of the population in 2006 to 29% of the population in 2016. Statistics Canada projects that racialized people could represent up to 48% of the Ontario population aged 15 to 64 by 2036.[9]

Growing Indigenous population. The Indigenous population is growing at a faster rate than the provincial population overall and is increasingly living in large urban areas. Statistics Canada notes that the Indigenous population is the fastest-growing segment of the Canadian population and has a younger age profile than the non-Indigenous population. Between 2006 and 2016, the Indigenous population in Ontario grew by 54% (from 242,490 to 374,395) compared with 11% for the provincial population overall.[10]

The younger age profile of the Indigenous population means that children made up a larger proportion of the Indigenous population. Statistics Canada data shows that while children aged 14 and under make up 17% of the non-Indigenous population in Canada, they make up 28% of the Indigenous population. In addition, there are more than 254,515 Indigenous youth aged 15 to 24, representing 18% of the total Indigenous population. By comparison, youth make up 13% of the non-Indigenous population.[11] In total, while children and youth (aged 24 and under) make up 30% of the non-Indigenous population, they represent almost half (46%) of the Indigenous population.

The 2016 Census enumerated 374,395 Indigenous people in Ontario, representing 2.9% of the provincial population. This is the largest number of Indigenous people in any province or territory, representing 22% of the total Indigenous population in Canada.

Increased prevalence of students with disabilities attending post-secondary institutions

Across Ontario and Canada, increasing numbers of students with disabilities are attending post-secondary education institutions. Approximately 22% of Canadians aged 15 and over

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[9] Statistics Canada. (2017, January 25). *Immigration and diversity: Population projections for Canada and its regions, 2011 to 2036*. https://www150.statcan.gc.ca/n1/pub/91-551-x/91-551-x2017001-eng.htm

[10] Statistics Canada. Census of Canada 2006 and 2016. Note that the Indigenous growth rate is the result of multiple factors, including a higher-than-average birth rate, better enumeration by Statistics Canada, and an increasing desire to self-identify as Indigenous.

[11] Statistics Canada. (2011). *Aboriginal Peoples in Canada: First Nations People, Métis and Inuit.* https://www12.statcan.gc.ca/nhs-enm/2011/as-sa/99-011-x/99-011-x2011001-eng.cfm

have a disability.[12] In 2011–2012, approximately 46,700 post-secondary students registered with offices for students with disabilities at publicly funded post-secondary institutions in Ontario. This number rose by 66% between 2003–2004 and 2012.[13] This figure includes 25,032 students with disabilities at publicly funded colleges, representing almost 14% of total college enrollment.[14]

A survey of 25,168 respondents at post-secondary institutions in Ontario revealed that the most common disabilities among post-secondary education students are mental health conditions, followed by ADD/ADHD, learning disabilities, and chronic illnesses.[15]

In 2017, 891,740 people in Canada identified as a visible minority with a disability.[16] Indigenous people are disproportionately identified as unemployed and living with disability.[17]

Various studies have noted a rise in the number of post-secondary students with mental health issues. In 2016, the National College Health Assessment reported that an increasing number of Canadian post-secondary students reported experiencing depression, anxiety, or other mental health issues. Of these students, 65% reported experiencing overwhelming anxiety in the previous year, 46% reported feeling so depressed it was difficult to function, and 13% seriously considered suicide.[18] A related directive from the Ontario Human Rights Commission came forward following the "Keep Learning in Mind" inquiry. In 2016, Ontario

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[12] Morris, S., Fawcett, G., Brisebois, L., & Hughes, J. (2018, November 28). *A demographic, employment and income profile of Canadians with disabilities aged 15 years and over, 2017*. https://www150.statcan.gc.ca/n1/en/catalogue/89-654-X2018002

[13] Baltman-Cord, A., & Holmes, A. (2013). *Building bridges: Linking employers to postsecondary graduates with disabilities (Ontario Chamber of Commerce Membership Survey)*. Ontario Chamber of Commerce. http://occ.ca/wp-content/uploads/BuildingBridges_online-1.pdf

[14] Ontario Ministry of Training, Colleges, and Universities. (2013). *Update on Students with Disabilities.* Presented February 2013 to the National Educational Association of Disabled Students (NEADS).

[15] American College Health Association. (2016). *National College Health Assessment II: Ontario Canada reference group executive summary*. American College Health Association. http://oucha.ca/pdf/2016_NCHA-II_WEB_SPRING_2016_ONTARIO_CANADA_REFERENCE_GROUP_EXECUTIVE_SUMMARY.pdf

[16] Statistics Canada. (2018). *Table 13-10-0374-01: Persons with and without disabilities aged 15 years and over, by age group and sex, Canada, provinces and territories*. https://doi.org/10.25318/1310037401-eng

[17] Statistics Canada. (2018, December 11). *Labour market experiences of First Nations people living off reserve: Key findings from the 2017 Aboriginal Peoples Survey* (pp. 10–15). https://www150.statcan.gc.ca/n1/pub/89-653-x/89-653-x2018003-eng.htm

[18] Ontario University and College Health Association. (2014). A snapshot of Ontario post-secondary student mental health. http://www.oucha.ca/pdf/mental_health/2014_06_post-secondary-mental-health.pdf

post-secondary institutions were directed to have specific measures in place to reduce systemic barriers to post-secondary education for students with mental health disabilities.

Although the Ontario *Human Rights Code* provides for equal rights and opportunities, and prohibits discrimination on the basis of disability (and other protected grounds), systemic barriers in organizations have persisted, preventing persons with disabilities from fully participating in many areas of life, including education and employment. The AODA was enacted in 2005 to achieve accessibility for Ontarians with disabilities on or before January 1, 2025, through the development, implementation, and enforcement of accessibility standards in key areas.

Increased social acceptance of, and openness from, people who belong to the 2SLGBTQ+ communities

Statistics Canada does not collect data on sexual orientation or gender identity as part of the Census of Canada. One estimate on the size of the 2SLGBTQ+ population comes from the 2014 Canadian Community Health Survey, which included a question on sexual orientation. In total, 3% of Canadians aged 18 to 59 self-identified as gay, lesbian, or bisexual, with 1.7% self-identifying as gay or lesbian and 1.3% as bisexual.[19] Another estimate of the size of the 2SLGBTQ+ population comes from a 2012 Forum Research poll, which found that 5% of Canadians aged 18 and over identify as lesbian, gay, bisexual, or transgender.[20]

Canada has seen increased legal protections for and increased social acceptance of people who belong to the 2SLGBTQ+ communities. In 2005, same-sex marriage was legalized in Canada. In 2012, gender identity and gender expression were added as protected grounds to the Ontario *Human Rights Code*. These legal protections and greater social inclusion have resulted in more adults being open about their sexual orientation and gender identity, with children and youth being increasingly open about their sexual orientation and gender identity at younger ages.[21] This change in laws and attitudes has resulted in 2SLGBTQ+ students, faculty, and staff being more visible on college and university campuses.

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[19] Statistics Canada. (2014). *Same-sex couples and sexual orientation... by the numbers.* Canadian Community Health Survey. https://www.statcan.gc.ca/eng/dai/smr08/2015/smr08_203_2015

[20] Carlson, K. B. (2012). The true north LGBT: New poll reveals landscape of gay Canada. *National Post.* https://nationalpost.com/news/canada/the-true-north-lgbt-new-poll-reveals-landscape-of-gay-canada

[21] CBC News. (2016, October 25). *Transgender kids coming out younger, experts say after judges ordered 4-year-old to dress like a boy.* http://www.cbc.ca/news/canada/calgary/trans-coming-out-earlier-1.3820013

3. Overview of this Inclusivity Assessment

3.1 The purpose of an Inclusivity Assessment of Student Programs and Services

An Inclusivity Assessment of student programs and services is a comprehensive review of policies and procedures as well as the programs and services offered to support the learning environment for students. An Inclusivity Assessment identifies what is working well and what requires improvement so that the College can build on its strengths and remove the systemic/institutional, cultural, and attitudinal barriers identified.

3.2 What are barriers?

Barriers are formal or informal policies, practices, and procedures that operate either by themselves or together to restrict or exclude groups of students from entry into, advancement in, and full participation within a post-secondary institution. Although any student can be unsuccessful in their academic pursuits for a variety of reasons, numerous studies have shown that certain groups (i.e., women, racialized people,[22] Indigenous Peoples, and persons with disabilities) face persistent and systemic barriers to accessing education. In addition, Lambton College has included international students and 2SLGBTQ+ students as part of this Inclusivity Assessment because of the evidence that members of these groups also face barriers to accessing education.

Indigenous Peoples have a special constitutional relationship with Canada, including treaty rights, which are recognized and affirmed in section 35 of the *Constitution Act, 1982.* The Government of Canada recognizes Indigenous self-government and has committed to a nation-to-nation relationship with First Nations, Inuit, and Métis.[23] As such, it is important to recognize that Indigenous Peoples are not just another equity-seeking group. We therefore refer to these five groups as "Indigenous Peoples and the equity-seeking groups" throughout this report.

Generally, barriers fall into three categories: systemic/institutional, cultural, and attitudinal. These barriers are interrelated and can reinforce each other.

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[22] The term "racialized" is used throughout this report to replace the term "visible minority" used by Statistics Canada. This definition includes those who self-identify as South Asian, Chinese, Black, Filipino, Latin American, Arab, Southeast Asian, West Asian, Korean, Japanese, mixed race, and others who identify as non-White and non-Indigenous.

[23] Government of Canada. (2018, February 14). *Principles respecting the Government of Canada's relationship with Indigenous peoples.* https://www.justice.gc.ca/eng/csj-sjc/principles-principes.html

Systemic/Institutional Barriers

Systemic barriers, also referred to as institutional barriers, are embedded in an organization's policies and practices. They arise from the use of criteria that are not program related or are not required for the safe and efficient operation of services. Systemic barriers may have evolved from historical practices (i.e., the way the organization has always done things) that possibly exclude Indigenous students and students from the equity-seeking groups or place them at a disadvantage that prevents them from receiving or benefitting equitably from programs and services. On the surface, the policies and practices may appear to be neutral or even reasonable. They may also result from unconscious biases on the part of staff and faculty. Despite their seeming neutrality, these policies and practices may have a negative impact on students.

Examples of systemic barriers that Indigenous students and students from the equity-seeking groups face in post-secondary settings include the following:

- Curriculums delivered through a Eurocentric, middle-class lens that fail to recognize diverse sources of knowledge and ways of learning, and

- Food offerings that don't reflect the diverse palates of students, or which fail to accommodate religious dietary restrictions, food allergies, and food sensitivities.

Cultural Barriers

Barriers can also be created by a program culture that isolates and alienates Indigenous students and students from the equity-seeking groups, sometimes unknowingly, and one in which stereotypes and preconceived notions about these groups persist and inform decision making. This could then confirm pre-existing biases and ultimately reinforce the underserving of these groups by the College's programs and services.

Cultural barriers can also be systemic in that they may be embedded within the practices of the organization (e.g., long-held practices with historic underpinnings). In addition, cultural barriers can influence and be influenced by the individual attitudes of staff, faculty, and leaders.

Examples of cultural barriers that Indigenous students and students from the equity-seeking groups face in post-secondary settings include the following:

- An unwelcoming environment that excludes or undermines their feeling of inclusion in the learning environment, and

- Assumptions that permeate the institution about what certain groups of people can and cannot do and how they should be treated because of these differences.

Attitudinal Barriers

Attitudinal barriers result from the attitudes and behaviours of individuals. They can arise from unconscious biases, inaccurate assumptions, and stereotypes, as well as an individual's actual intent to be discriminatory.

Examples of attitudinal barriers that Indigenous students and students from the equity-seeking groups face in post-secondary settings include the following:

- Faculty not learning to correctly pronounce a student's name because it is unfamiliar and believed to be difficult to learn

- Repeatedly misgendering a student or calling them by their dead name, and

- Assuming a negative motivation on the part of a student when they behave in a way that staff or faculty do not understand.

Cultural and attitudinal barriers may not be found in the written policies or procedures, and in fact may not be consistent with the organization's formal policies and practices.

3.3 The benefits of education equity

The argument for education equity has gone beyond the moral argument that it is the "right thing to do." There is a growing body of literature that makes a compelling business case for ensuring and supporting a diverse student body and equitable outcomes for students. The literature identifies a number of benefits, including:

Increased student success and well-being.[24] Student success and outcomes such as well-being, academic achievement, and attendance are improved when colleges develop more inclusive and responsive policies, programs, and practices, and when students see themselves reflected in the curriculum and their college environments. More inclusive learning environments benefit all students by fostering better learning experiences and improving graduation rates. It also helps to graduate students who are ready and able to work in an increasingly diverse and global labour market.

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[24] See for example:

Cherng, H. S., & Halpin, P. F. (2016). The importance of minority teachers: Student perceptions of minority versus white teachers. *Educational Researcher*, 45(7), 407–420. https://doi.org/10.3102%2F0013189X16671718

Gershenson, S., Hart, C. M. D., Lindsay, C. A., & Papageorge, N. W. (2017, March). *The long-run impact of same-race teachers*. IZA Institute of Labor Economics. https://www.iza.org/publications/dp/10630/the-long-run-impacts-of-same-race-teachers

Stuart Wells, A., Fox, L., & Cordova-Cobo, D. (2016, February 9). *How racially diverse schools and classrooms can benefit all students*. The Century Foundation. https://tcf.org/content/report/how-racially-diverse-schools-and-classrooms-can-benefit-all-students/

Strengthened confidence in public education. College employees, programs, and services that reflect, understand, and are responsive to the needs of students also help to improve confidence in publicly funded post-secondary education. An equitable and inclusive education system is recognized internationally as critical to delivering a high-quality education for all learners.[25]

Increased creativity and innovation.[26] Educational institutions that encourage and support EDI are better able to attract and retain top talent from diverse backgrounds, communities, and identities. This increases the diversity of perspectives, approaches, knowledge, and skills within the learning and research environments, which can then boost the organization's creativity, innovation, and overall success.

4. Methodology

4.1 Inclusivity Assessment Framework

The Ontario *Human Rights Code* ("the Code") requires that Lambton College provide non-discriminatory education services, maintain a harassment-free learning environment, and provide accommodation based on any human rights protected ground, short of undue hardship. Additional equity-related requirements are set out in the AODA, which includes a number of standards to ensure that persons with disabilities have access to the same services as persons without disabilities.

To conduct this audit, student policies and procedures were reviewed against the following criteria:

- **Legal compliance:** to ensure compliance with equity-related legislation such as the Ontario *Human Rights Code* and AODA

- **Adverse impact:** to assess whether they have a disproportionately negative impact on Indigenous students and students from the equity-seeking groups

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[25] United Nations Educational, Scientific, and Cultural Organization. (2008). *Inclusive education: The way of the future*. UNESCO International Conference on Education, November 25–28, 2008. Author. http://www.ibe.unesco.org/fileadmin/user_upload/Policy_Dialogue/48th_ICE/CONFINTED_48-3_English.pdf

[26] See for example:

McKinsey & Company. (2015). *Women in the workplace*. https://womenintheworkplace.com/

Reynolds, A., & Lewis, D. (2017, March 30). Teams solve problems faster when they're more cognitively diverse. *Harvard Business Review*. https://hbr.org/2017/03/teams-solve-problems-faster-when-theyre-more-cognitively-diverse

Forbes Insights. (2011). *Global diversity and inclusion: Fostering innovation through a diverse workforce*. https://images.forbes.com/forbesinsights/StudyPDFs/Innovation_Through_Diversity.pdf

- **Accommodation:** to assess whether policies and procedures reflect the varying needs of students from diverse communities, backgrounds, and identities and provide the needed accommodation, and

- **Inclusive:** to assess whether policies and practices support the full inclusion of all students.

The research team explored any equity issues that arose in the course of conducting this Inclusivity Assessment. While this review focuses on the issues affecting Indigenous students and students from the equity-seeking groups because they face persistent and systemic discrimination in access to education, the removal of barriers to programs and services will create truly inclusive services that benefit all students.

4.2 Data collection methods

A number of methods were used to collect data for this Inclusivity Assessment, including the following:

Document review

Student-related policies, written procedures, and other related documents were reviewed to identify potential barriers in the policies.

A list of the policies and documents reviewed is included in Appendix A.

Observations

Over the course of 2 days in November 2021, two research assistants working with Turner Consulting Group visited the Sarnia campus and conducted 14 hours of observation. They documented their own experiences of visiting various offices to request information, interacting with staff and students, and reviewing posters, brochures, and other material available to students. They also conducted firsthand observations of interactions between staff and students.

Consultations

Consultations with students about their experiences with Lambton's learning environment and student services were conducted through focus groups and an online survey.

It is important to note that this Inclusivity Assessment was undertaken 2 years into the COVID-19 pandemic, when most students were learning remotely. This made it difficult to engage with students given the lack of campus activity and the added pressures they faced as they continued experiencing isolation, challenges with learning online, and the individual impacts of the pandemic on their personal lives. As such, while every effort was made to inform students about the Inclusivity Assessment through email and social media, there may have been many students who did not hear about the project or about the various opportunities to participate. There may also have been students who, because of their school

work or the timing of the focus groups, were not able to participate in the Inclusivity Assessment.

Student focus groups: Twenty virtual focus groups were scheduled in November 2021 to give students the opportunity to provide input into this Inclusivity Assessment. Emails were distributed to all students informing them about the project and inviting them to participate in the virtual focus groups. To protect their anonymity, they were able to register directly with the consultants.

Students were offered a $10 gift card to encourage their participation in the focus groups.

The discussions in these focus groups covered various aspects of the learning environment and student services, what impact they might have on students, and barriers created by the culture of the institution and individual attitudes.

While 71 students registered to participate in the focus group, only 13 participated.

Student Inclusivity Survey: To provide more opportunity to participate in the Inclusivity Assessment, students were able to share their input through an online survey. The survey was open from October to December and promoted to students through emails, social media, and other communication vehicles. The survey was closed on December 23, with 202 participants.

Employee focus groups and interviews: Through focus groups and interviews, employees were also asked about the learning environment and provision of student services, and how well Lambton meets the needs of students who are Indigenous, racialized, 2SLGBTQ+, women, or international, or who have disabilities. Focus group participants were also asked to share their recommendations for addressing some of the identified issues.

In total, 261 employees shared their input through the online survey, focus groups, and interviews.

To maintain confidentiality and protect the privacy of the students and employees who participated in the focus groups, no names or identifying information are included in this report.

External stakeholders: Focus groups and interviews were also held with members of the Foundation and Board. In addition, the mayor of Sarnia and the warden of the County of Sarnia-Lambton were interviewed.

Internal stakeholders: Focus groups were also held with Human Resources staff, and telephone interviews were conducted with union presidents. Telephone interviews were also conducted with various internal stakeholders, including Human Resources managers, the manager of the Indigenous Student Centre, the SAC president, and others.

Senior leadership interviews: In addition, all members of the College Leadership Team were interviewed. These interviews gave the consultants the opportunity to further explore EDI issues and to identify the key challenges the organization will face in implementing the recommendations from this review.

Information from the focus groups and interviews is used to inform the understanding of issues, and in some cases is summarized in this report. To maintain confidentiality and protect the privacy of the students and employees who participated in the focus groups and focus groups, no names or identifying information are included in this report.

PART B: FINDINGS & RECOMMENDATIONS

This section summarizes the findings from the review of policies and relevant documents, review of information from the College's website, observations made during the campus visit, and consultations with employees and students.

In each section, we provide:

- A summary of the findings and any conclusions drawn, and
- Recommendations to remove the barriers and address the issues identified.

5. Policies Training

This section summarizes our review of the College's student-related policies, procedures, and related documents. It includes a summary of the document, and identifies issues and areas of concern, if any. We make recommendations to strengthen the policy or procedure to comply with equity-related legislation, meet the College's duty of care to students, and advance Indigeneity and EDI. We also address overarching concerns and identify any gaps in the College's policy framework.

While all student-related policies were reviewed, only the policies relevant to this Inclusivity Assessment, and those with which we have identified issues, are included here.

The list of documents reviewed is included in Appendix A.

5.1 Academic Policies

Application and Admission to Programs Policy

The Application and Admission to Programs Policy describes criteria for application and admission to Lambton College. It describes application requirements for students in five categories: secondary school graduate, mature student, international student, home-school student, and part-time Lambton College student applying to full-time studies. The policy describes the application process based on the program of interest (i.e., degree, diploma, certificate program, or part-time studies). It also outlines criteria for appeals and priority admissions.

The policy:

- Has a stated commitment to assessing applicants "in a fair, objective and equitable manner that is consistent with the principles of the Ontario *Human Rights Code*, the regulations of the Ministry of Training, Colleges and Universities and the policies of the Board of Governors"
- Encourages applications from academically qualified persons with disabilities

- Reserves the right of the College to designate spaces in highly competitive programs for Indigenous students who have satisfied the minimum program admission requirements

- Reserves the right of the College, in exceptional circumstances, to consider for admission individuals who do not meet the admission requirements, and

- Specifies the mechanism for appeal for those who feel they have been inappropriately or unfairly denied admission.

While the policy states that "Lambton College encourages academically qualified people with disabilities to apply for admissions to its programs." It goes on to state, that "all applicants must satisfy the admissions requirements to be admitted." Although it is welcoming to highlight that persons with disabilities are encouraged to apply, the reiteration that they must satisfy admission requirements reflects a stereotype that persons with disabilities are not capable of high academic achievement or are expecting special treatment. This paragraph could also be expanded to encourage applications from members of other equity-seeking groups.

The policy also addresses the need for students in programs that have clinical, field, co-op, or work placements to provide a current criminal record check or a Vulnerable Sector Screening, as required by the host agency or employer, before starting a placement. The policy states:

> Individuals who have a criminal record and have not been pardoned or have an imperfect vulnerable person check report may not be accepted by an employer or host agency and so may not be able to participate in a clinical, field, co-op or work placement. A criminal record without a pardon or an imperfect vulnerable person check report will not prevent admission to a program, but may seriously impair the student's opportunity to ability to meet program graduation requirements with respect to clinical, field, co-op or work placement, or find employment in the vocation after graduation.

However, an employer's requirement that all job seekers provide a clear criminal record check for any position is unnecessary and could violate the Ontario *Human Rights Code.* The Ontario Human Rights Commission states that a job candidate's record of offences, which would include students who participate in work placements, should be considered only if it is job related:

> Employers must look at a person's record of offences and consider whether the offence would have a real effect on the person's ability to do the job and risk associated with them doing it. Employers can refuse to hire someone based on a

record of offences only if they can show this is a reasonable and *bona fide* qualification.[27]

Furthermore, the Ontario Human Rights Commission states that if the organization wants a police records check as part of its hiring process, it must be prepared to justify the decision using "the test set out by the Supreme Court of Canada for assessing whether a policy, practice or requirement is reasonable and *bona fide.*"[28] Requiring a criminal record check for every position could fail this test, as it is not a bona fide job requirement.

Moreover, the need for a clear police record check could create barriers to trans, Black, and Indigenous students in particular, as they disproportionately have encounters with police because of racial profiling;[29] face transphobia and racism in the criminal justice system,[30] resulting in criminal convictions for minor offenses and/or survival-based crimes (e.g., trespassing); and face structural racism, which places them at risk of criminalization.

The College could work with employers who accept students for clinical, field, co-op, or work placements to ensure that their policies regarding police records checks are consistent with the Ontario *Human Rights Code* and do not discriminate against students. This could be added to the policy and additional information provided to students in the relevant programs.

Recommendation 1: It is recommended that the language in the Application and Admission to Programs Policy referencing persons with disabilities be revised to remove language suggesting that they would not be as qualified as persons without disabilities.

Recommendation 2: It is recommended that the Application and Admission to Programs Policy encourage applications from all equity-seeking groups, including Indigenous Peoples, racialized people, and those who identify as 2SLGBTQ+.

Recommendation 3: It is recommended that the Application and Admission to Programs Policy state that Lambton College will work with education partners and employers who

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[27] Ontario Human Rights Commission. (n.d.). *Record of offences*. https://www.ohrc.on.ca/en/code_grounds/record_of_offences

[28] Ontario Human Rights Commission. (2008). 6. Requesting job-related sensitive information. In *Human rights at work 2008* (3rd ed.). http://www.ohrc.on.ca/en/iv-human-rights-issues-all-stages-employment/6-requesting-job-related-sensitive-information

[29] See: Ontario Human Rights Commission. (2003, October 21). *Paying the price: The human cost of racial profiling*. https://www.ohrc.on.ca/en/paying-price-human-cost-racial-profiling;

[30] See: Government of Ontario. (1995). *Report of the Commission on Systemic Racism in the Ontario Criminal Justice System*. http://www.ontla.on.ca/library/repository/mon/25005/185733.pdf; Rankin, J., Winsa, P., & Ng, H. (2013, March 4). Unequal justice: Aboriginal and black inmates disproportionately fill Ontario jails. *Toronto Star*. https://www.thestar.com/news/insight/2013/03/01/unequal_justice_aboriginal_and_black_inmates_disproportionately_fill_ontario_jails.html

accept students for clinical, field, co-op, or work placements to ensure that their police records check policies are consistent with the Ontario *Human Rights Code* and do not discriminate against students. Instead, potential employers should consider the nature, date, and extent of the criminal record to assess whether the candidate is suitable for the position.

Recommendation 4: Once the College has ensured that police records check policies are not a barrier to student placements, it is recommended that additional information be provided to students so that they are aware that a criminal record is not in itself a barrier to being accepted to a placement.

Registration Policy

The Registration Policy describes the process for registration and includes information relating to deadlines, change of program, and withdrawal from courses and the College.

The policy supports the full inclusion of transgender students and other students by permitting all students to provide a preferred name that can be used in most College operating documents, such as class lists and internal and external communications. It also permits students to review and change the information on record with the College, and permits changes to the gender on record, preferred name, and legal name. The policy also allows for the reissuing of a College diploma, certificate, or other credentials with a different graduate name.

No issues were found with this policy.

Grades and Academic Averages Policy

The Grades and Academic Averages Policy describes grades and definitions. It also provides links to sites for further details (e.g., registration to transfer credits, etc.). The policy provides details for the grades that may be issued for a course and the requirements and conditions that circumscribe them.

The policy allows for an Aegrotat grade (AG) to be awarded to "a student whose performance, over a significant portion of, and number of outcomes in the course, was fully satisfactory but where, because of significant extenuating personal reasons, such as illness, the student is unable to complete the course." This grade is awarded if the Dean is confident that the student's attainment of course learning outcomes is largely complete. This grade is counted toward program requirements.

A variety of temporary grade options are offered that support students who may require additional time to complete outstanding projects to achieve a passing grade or to complete placement. An "Incomplete" grade is an option for students who may provide additional work to raise their marks to a passing grade within two weeks of the end of the course. A "No Grade" option offers students who have medical or personal reasons up to eight weeks into

the next semester to complete work for a course. A "Temporary Grade" is available for field, clinical, practicum, or co-op placements because of a problem originating with the host agency or employer.

This policy supports Indigenous students and students from the equity-seeking groups who may find their studies interrupted for a variety of reasons or who may face challenges completing course requirements.

No issues were found with this policy.

Progression and Graduation from a Program Policy

The Progression and Graduation from a Program Policy describes the requirements to complete a course in a program in a timely fashion. The policy:

- Provides details for prerequisite and corequisites and the student's role in ensuring they meet these conditions before registering in a course

- Describes program progression and the grade point average required to move forward in a program, and

- Provides information regarding repeating courses and levels, and describes processes for repeats and the consequences if a student does not meet the requirements.

The policy provides graduation information, outlining minimum grades, required courses, and currency of courses. It also addresses the possibility that students may have their studies interrupted, and exceptions are offered for currency of a course in order to not jeopardize the student's achievement. These provisions are supportive of students who may need to pause their learning or to use credits from courses outside the current time frame. This aids mature students or students with additional barriers who may have extenuating circumstances that prevent them from completing coursework within the identified time frame.

Persons with "documented disabilities" are offered more time to complete their programs. Typically, students are expected to complete the program within 150% of the normal full-time program duration. Students with documented disabilities are able to take up to 200% of the expected full-time program duration. For degree programs, the corresponding maximum durations are 175% and 200%.

No issues were found with this policy.

Test and Exam Writing Protocol Policy

The Test and Exam Writing Protocol Policy outlines details related to evaluation through tests, exams, and assignments and precautions taken against cheating on the evaluation.

The policy identifies the items students are not permitted to have near them during the evaluation, including electronic devices, with the exception of "medical devices, recognized by the Accessibility Centre." This term could be replaced with a broader term such as "assistive technologies."

This policy does not state that students who require accommodation to complete a test or exam will be provided the accommodation, as required by the Ontario *Human Rights Code*, and the process for requesting accommodation. The policy also does not address the need to ensure that tests and exams are not scheduled on religious holy days.

Recommendation 5: It is recommended that the Test and Exam Writing Protocol Policy use the broader term "assistive technologies" rather than "medical devices."

Recommendation 6: It is recommended that the Test and Exam Writing Protocol Policy add information related to the College's obligation under the Ontario *Human Rights Code* to provide accommodation to students based on any human rights protected ground, and the process for requesting the needed accommodation.

Recommendation 7: It is recommended that the Test and Exam Writing Protocol Policy state the College's commitment to ensuring that tests and exams are not scheduled on religious holy days.

General Education Policy

This policy describes the purpose of General Education as contributing:

> … to the development of citizens who are conscious of the diversity, complexity, and richness of the human experience, who are able to establish meaning through this consciousness; and who, as a result, are able to contribute thoughtfully, creatively, and positively to the society in which they live and work.

The policy provides details related to the provision of General Education courses within post-secondary programs. It provides definitions, approval, student requirements, and transfer specifications.

No issues were found with this policy.

Student Request for Review Instruction Policy

The Student Request for Review of Instruction Policy outlines the resolution process when students request a formal review of the professor's presentation of a course.

The policy requires that students first attempt to resolve the issue through discussions with their professor. If their concerns are not addressed, they are then encouraged to meet with the Dean to resolve the issues through informal discussions. If the issues remain unresolved, the student may request a review through the Student Request for Review of Instruction

Form, which is to be completed and delivered to the Office of the Registrar and Financial Aid Services. To be considered for review, the form must be signed by at least one-third of the students in the course section.

Should a student have an issue related to their identity, this policy requires that students seek the support of their classmates in having their concerns addressed. This may be difficult for some students who may be in the minority in the class. The policy also does not provide for supports for students who may need additional assistance in having their issues addressed such as from the International Students' Office, the Accessibility Centre, the Wellness Centre, the Indigenous Centre, or the Student Administrative Council, as relevant.

Recommendation 8: It is recommended that the Student Request for Review Instruction Policy be expanded to recognize that Indigenous students and students from the equity-seeking groups may not be able to have the Student Request for Review of Instruction Form signed by at least one-third of the class, and to provide another avenue through which their concerns may be brought forward to the Dean for consideration.

Recommendation 9: It is recommended that the Student Request for Review Instruction Policy identify supports for Indigenous students and students from the equity-seeking groups to advance their concerns should they need support.

Appeal of an Academic Decision Policy

The Appeal of an Academic Decision Policy outlines details related to the appeals process for academic decisions made by faculty or other decision makers when evaluating student competencies. It also describes the rights and responsibilities of the student in the appeal process.

The policy does not cover appeals concerning disciplinary decisions, including academic dishonesty, or concerns or issues arising from harassment, discrimination, bullying, and other inappropriate behaviours. These issues are addressed by the Student Rights, Responsibilities, and Discipline Policy.

The policy states that the student and teacher have the right to be assisted at the appeal hearing by any advisor they choose from inside the College, at their own expense. However, no "external (to the College) advisors, representatives or assistants may attend the appeal hearing." Requiring that the advisor be only internal to the College may disadvantage Indigenous students and students from the equity-seeking groups, who may not have access to staff who fully understand the issues they are experiencing.

Recommendation 10: It is recommended that the Appeal of an Academic Decision Policy allow students to have external advisors, representatives, or assistants at the appeal hearing, at their own expense.

Academic Freedom—Rights and Responsibilities Policy

The Academic Freedom—Rights and Responsibilities Policy outlines the support for academic freedom for teachers, researchers, and students. It explains the areas included in academic freedom, such as freedom from restrictions prescribed by doctrine or threat of institutional censorship or when expressing one's opinion. It defines academic freedom as "the right to teach, learn, study and publish free of orthodoxy or threat of reprisal and discrimination."

The policy:

- Commits the College to support a high level of scholarship through the provision of opportunities, infrastructure, and academic freedom

- Protects rigorous and ethical scholarship without reprisal by individuals, the institution, or government

- States that academic freedom is not an unrestricted absolute and outlines limitations to scholarly freedom, including compliance with federal and provincial government legislation and directives

- Describes the importance of employees and students being cognizant of their position as institutional representatives. They may exercise their academic freedom and be free of institutional censorship or discipline with the understanding that expressions must be accurate and truthful, and exercise appropriate respect for others and their opinions, and

- States that individuals may face disciplinary action for breach of the policy.

The policy, however, does not make direct reference to legislation that would limit academic freedom, specifically the Ontario *Human Rights Code* and anti-hate provisions of the *Criminal Code.* It also does not specify the process to register or address a complaint.

Recommendation 11: It is recommended that the Academic Freedom—Rights and Responsibilities Policy directly refer to legislation that protects individuals who may be harmed by discriminatory or hate-based academic statements and publications, such as the Ontario *Human Rights Code* and anti-hate provisions of the *Criminal Code.*

Recommendation 12: It is recommended that the Academic Freedom—Rights and Responsibilities Policy refer to the process for filing a complaint should one feel that their rights have been violated by another's academic freedom.

Use of Recording Devices on Campus Policy

The Use of Recording Devices on Campus Policy addresses the College's commitment to "upholding the privacy rights of individuals as defined and protected by federal and provincial legislation, such as the *Freedom of Information and Protection of Privacy Act*, as well as the

property rights inherent to the teaching–learning environment and explicitly protected under the *Canada Copyright Act*."

It outlines the prohibition of recording, including mechanical, electronic, audio, video, or still photography in the classroom, laboratory, or other learning or teaching settings without express written permission of the teacher or other College employee. The policy:

- Describes the procedure to request permission to make recordings

- Makes provision for students with disabilities to gain a signed recommendation from the Accessibility Centre to record as an accommodation and indicates that the accommodation not be unreasonably withheld

- References an appeal process to be used when recording permission is denied

- Addresses the need to respect the privacy of individuals in the College community, and

- Specifies that those who fail to comply with the policy will be subject to disciplinary actions.

No issues were found with this policy.

5.2   Program Support Policies

Program Curriculum Development, Review, Revision, and Documentation Policy

The Program Curriculum Development, Review, Revision, and Documentation Policy commits the College to ensuring that program curriculum be current, appropriate, and consistent with Ministry, College Board, Credential Validation Service, professional, and industry requirements and expectations.

The policy provides a process for the development of new program curriculums as well as the review and revision of existing curriculums. However, the policy does not specify the need to address issues of equity and diversity, specific to the course content, and ensure that curriculums are up to date, relevant for the current context, and do not perpetuate negative stereotypes about various groups of people. The policy also does not address the College's commitment to embed Indigenous culture and history into its curriculums.

Recommendation 13: It is recommended that the Program Curriculum Development, Review, Revision, and Documentation Policy require that the development of a new curriculum or revision of an existing curriculum be conducted through an equity lens, to ensure that the information taught to students is up to date; relevant for the current context; supports them to be conscious of the diversity, complexity, and richness of the human experience; embeds Indigenous culture and history; and supports them to understand racism and other forms of oppression that operate in society and potentially in their chosen profession.

Post-Secondary Timetabling Policy

The Post-Secondary Timetabling Policy commits the College to "developing timetables that prioritize student success, while balancing the optimization and efficient use of College human and physical resources." The policy:

- Describes the tasks and responsibilities for timetabling

- Sets limits for students' evaluation and class times, and faculty timetables.

For faculty timetables, the policy identifies the following "acceptable constraints" that may impact their timetabling, including:

- Documented religious observance

Documented medical restrictions, which must be communicated to and proved by Human Resources Department. While the policy addresses accommodation based on religion and disability, it does not make mention of other grounds on which accommodation may be requested, nor does it state the College's legal obligation to provide accommodation, short of undue hardship, under the Ontario *Human Rights Code*.

Recommendation 14: It is recommended that the Post-Secondary Timetabling Policy state the College's obligation to provide accommodation for both students and faculty, short of undue hardship, under the Ontario *Human Rights Code*, and specify that accommodation will be provided based on any human rights protected ground, including religion, disability, sex (including pregnancy and breastfeeding), and family status (including child and elder care responsibilities).

Program Quality Assurance Policy

The Program Quality Assurance Policy outlines the process for ensuring that programs are of a high and continuously improving quality. However, the policy does not address the need to ensure that programs remain relevant to an increasingly diverse student and provincial population, nor that the information taught to students supports them to be conscious of the diversity, complexity, and richness of the human experience.

Recommendation 15: It is recommended that the Program Quality Assurance Policy ensure that program reviews are conducted through an equity lens to ensure that programs are relevant to an increasingly diverse student and provincial population; support students to be conscious of the diversity, complexity, and richness of the human experience; embed Indigenous culture and history; and support students to understand racism and other forms of oppression that operate in society and potentially in their chosen profession.

Academic Program Prioritization, Revitalization, and Rationalization Policy

This policy is intended to maintain and enhance academic programming quality while limiting adverse impacts on student access. It recognizes that "demographic shifts, new technologies,

changes in employment trends, and global competition will lead to changing student markets and the need for changes to the academic programming," and the need for ongoing program assessment, enhancement, and revitalization.

The policy provides the performance measures and associated criteria that all programs will be reviewed and assessed against annually. A number of performance measures are listed, such as:

- The number of Indigenous students in the program
- The number of domestic students and international students
- The percentage of students who move from Term 1 to Term 2
- The number of students who graduate from the program (within 200% of the normal program length) compared to the number of students who initially enrolled in the program
- The percentage of graduates employed in a related field or pursuing further education, and
- Student satisfaction with teaching and learning.

No issues were found with this policy.

College Advisory Council Policy

The College Advisory Council Policy serves as the administrative framework for the College Advisory Council to provide advice to the President on promoting excellence and communication within the College community. The Council will also provide a forum where students, faculty, and staff can provide input on decision-making processes on academic and student services matters.

While the policy specifies the membership of the Council, it does not address the need to ensure diversity on the Council. The policy can also be strengthened by adding to its mandate the practice of reviewing and making recommendations on issues related to Indigeneity, inclusion, diversity, equity, and accessibility.

Recommendation 16: It is recommended that the College Advisory Council Policy address the need to ensure diversity on the Council and a commitment to gender balance.

Recommendation 17: It is recommended that the College Advisory Council Policy include in the Council's mandate the practice of reviewing and making recommendations on issues related to Indigeneity, inclusion, diversity, equity, and accessibility.

Program Advisory Committees Policy

This policy permits the Board of Governors to appoint members of the Program Advisory Committees (PACs) that are representative of the employers and industry sectors that each program serves.

PACs ensure that programs offered by the College meet the changing needs of the labour market by identifying and suggesting new programs and courses. They also offer advice regarding program learning outcomes, curriculum, facilities, clinical and field experience, co-op and work experience, placement opportunities, effectiveness of graduates, and community needs.

The policy makes no mention of the responsibility of PACs to ensure that programs are relevant to an increasingly diverse student and provincial population. In addition, while the policy specifies the membership of PACs, no consideration is given to the need for diversity on these committees.

Recommendation 18: It is recommended that the Program Advisory Committees Policy address the need to ensure the inclusion of Indigenous Peoples and members of the equity-seeking groups and a commitment to gender balance.

Recommendation 19: It is recommended that the Program Advisory Committees Policy ensure that consideration of new courses and program reviews are conducted through an equity lens to ensure that programs are relevant to an increasingly diverse student population; support students to be conscious of the diversity, complexity, and richness of the human experience; embed Indigenous culture and history; and support students to understand racism and other forms of oppression that operate in society and potentially in their chosen profession.

Student Program Forums Policy

The Student Program Forums provides a venue through which student representatives can offer constructive and critical comments regarding programs, staff, and services, delivery of programs, and best practices. The forums allow departments to hear student comments and undertake appropriate responses to them. Student representatives are to be elected by the students in that year of the program and are able to request 15 minutes of classroom time to identify and discuss items to be brought to the next Forum meeting.

No consideration is given to the need to collect feedback form Indigenous students and students from the equity-seeking groups or the need to ensure that all students have an anonymous venue through which to share their concerns.

Recommendation 20: It is recommended that the Student Program Forums Policy ensure that Indigenous students and students from the equity-seeking groups are encouraged to

provide their input and that all students have an anonymous venue through which to share their concerns.

5.3 Student Conduct

Student Rights and Responsibilities and Discipline Policy

This policy specifies the student rights and responsibilities that serve as a foundation for relationships between the student and other members of the College community. This policy also outlines the conduct expected of each student according to the Code of Conduct, which is "designed to promote behaviour that aligns with the College's values and reflects the honesty, integrity, trust, and fairness expected in the actions of all members of the Lambton community".

The policy establishes the responsibility of the College to address inappropriate behaviours when they do occur and to constructively address both the behaviour and the individuals involved in an appropriate and effective manner.

The policy states that it applies to all students when they are on any property owned or leased by the College, or when they are participating in any learning experience or event associated with the College. It also covers internet communications and other "off-campus" conduct that engages the College's duty to provide a safe and harassment-free learning and working environment.

The policy:

- Applies to acts of academic dishonesty as well as misconduct, including abuse of authority, reprisal, harassment, ridicule and humiliation, and threats to security of person or personal property
- States that students have the right to an environment that is safe, secure, and free of harassment, and one in which they can study, play, and interact with freedom from harassment
- Is grounded in the Ontario *Human Rights Code*, the *Canadian Charter of Rights and Freedoms,* and the *Freedom of Information and Protection of Privacy Act*
- Identifies the additional rights to receive instruction free of disruption; to be impartially graded; to receive academic information; to ownership over submitted work; and to have the laws of natural justice prevail in official procedures
- Outlines student responsibilities relevant to their rights
- Defines and provides examples of misconduct and academic dishonesty
- States that behaviour that is inconsistent with the Code of Conduct will lead to sanctions by the College, up to and including suspension or expulsion, and

- Describes the disciplinary procedures and steps for reconsideration.

While the policy addresses the makeup of the membership on the Review Panel, it does not address the need to ensure gender balance or diversity among members of the panel.

While the Review Panel may be an appropriate avenue to address issues of academic integrity, it may not be appropriate for addressing human rights and harassment complaints from students. First, the process is not in compliance with the College's responsibility to investigate human rights complaints. While it includes an investigative component to allegations of academic dishonesty, stating that "the faculty member lodging the complaint will investigate the breach and submit the evidence to the Hearing Office," the same is not provided for complaints of harassment or discrimination. Instead, it appears that the complainant is required to be responsible for presenting their case, in the presence of the respondent. Second, where there is an allegation of harassment or other form of oppression, students may not feel safe or equipped to use this forum to have their issues addressed. Third, witnesses may not wish to participate in a review hearing if they need to provide evidence in the presence of the respondent. It would be more appropriate to have a separate policy to address student misconduct that includes harassment or discrimination.

A policy that deals with harassment and discrimination should also:

- Specify that the police may be called when violations of the Code of Conduct are of a criminal nature, and

- Ensure that the list of Code-protected grounds is complete and includes sex, gender expression, and gender identity.

The policy can be further strengthened by addressing the responsibilities of the College, including staff and faculty, under the Ontario *Human Rights Code* to:[31]

- Acknowledge and address potential human rights issues, whether or not a formal complaint has been made, when they ought reasonably to be aware of discrimination and/or harassment

- Proactively assess and investigate systemic discrimination and racism within the institution's operations, especially where patterns or repeated allegations are raised, and to prevent future occurrences, and

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[31] Ontario Human Rights Commission. (2020, December 18). *Letter to universities and colleges on racism and other human rights concerns.* https://www.ohrc.on.ca/en/news_centre/letter-universities-and-colleges-racism-and-other-human-rights-concerns

- Investigate and ensure that prompt steps are taken to prevent any further harm or discrimination to their community members.[32]

The policy states that the respondent and complainant each have the right to be assisted at the review hearing by an advisor of their choosing from inside the College, at their own expense. No allowance is made for them to have an advisor who is external to the College. Requiring that the advisor be internal to the College may disadvantage Indigenous students and students from the equity-seeking groups, who may not have access to staff who fully understand the issues they are experiencing.

The policy does not allow for an appeal process for students who have been sanctioned.

Recommendation 21: It is recommended that a separate policy and process be developed to address complaints of non-academic misconduct offences by students and ensure compliance with the Ontario *Human Rights Code* (for example, see Student Human Rights Policy).

Recommendation 22: It is recommended that the Student Rights and Responsibilities and Discipline Policy allow students to bring in an advisor who is external to the College and include a process for students to appeal sanctions under this policy.

Assessing, Addressing, and Serving the High-Risk Student Policy

This policy delineates the framework and mechanisms by which the College will identify high-risk students, coordinate an appropriate institutional response, and monitor the effectiveness of the response and the behaviour of the student. The policy:

- Outlines the expectation that all employees identify and report students who exhibit threatening or disruptive behaviours

- Identifies the responsibility of the administrator to establish the severity of the incident, determine whether to involve an Intervention Team, and identify any further actions to be taken such as immediate suspension, and

- Identifies the responsibility of the Intervention Team to develop a High-Risk Student Intervention Plan.

While the policy helps with addressing high-risk student behaviours, it could be further strengthened in the following ways:

- The policy identifies that the Director of Student Success will report annually on the number of Intervention Teams and Plans formed in the year, as well as the status or outcome of each plan. The Director could also analyze the issues, characteristics, and identities of students deemed to be high risk (e.g., Indigenous students,

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[32] *Wall v. University of Waterloo* (1995) 27 C.H.R.R. D/44 (Ont. Bd. of Inq.)

international students, other students from the equity-seeking groups), and identify any emerging or systemic issues and the need for additional resources for these students.

- The policy does not identify the need to identify mitigating or underlying factors that contribute to the student's behaviours (e.g., bullying or harassment) or the need to balance the rights of those in the College community to safety and well-being with an individual's right to be free from discrimination and accommodated where a Code-protected ground is present.

- The Intervention Plan is developed without any input from the student, or any supports the student has been accessing on campus (e.g., Indigenous Student Centre, Wellness Centre, etc.) Their involvement in the development of the Intervention Plan may provide insights into any underlying issues and could result in a more relevant plan to meet the student's needs and address the behaviours of concern.

- A reference should be made to provide accompaniment to the student in meetings with the Intervention Team.

- Targets or victims of violence or threats of violence will be referred to the supports that they may require.

- The Questions to Direct the Deliberations of the Threat Assessment Team are drawn from a 2002 publication. As such, they do not make reference to new technologies or the internet, and thus would not be relevant in cases where individuals have recently acted out in the school environment (e.g., on Tik Tok).

Recommendation 23: It is recommended that the Assessing, Addressing, and Serving the High-Risk Student Policy be revised to address the identified issues.

Recommendation 24: It is recommended that the Assessing, Addressing, and Serving the High-Risk Student Policy require that the Director of Student Success report annually on the number of Intervention Teams and Plans formed in the year, the status or outcome of each plan, an analysis of the issues, the students deemed to be high risk (e.g., Indigenous students, international students, other students from the equity-seeking groups), and any emerging or systemic issues and the need for additional resources at the College.

Recommendation 25: It is recommended that the Assessing, Addressing, and Serving the High-Risk Student Policy include a mechanism through which students can anonymously report worrisome behaviour.

5.4   Student Employment

Work-Integrated Learning Policy

The Work-Integrated Learning Policy outlines information about cooperative education and internships, clinical, and field placements for student work experience that contributes to their development and success.

While the policy identifies the student's responsibilities when involved in work placements, no mention is made of their right to a discrimination- and harassment-free workplace under the Ontario *Human Rights Code* or the *Occupational Health and Safety Act*, or to accommodation under the Code or the AODA. It also does not provide a mechanism through which students are able to raise concerns when they do occur and provide feedback on their work experience to ensure that the College is not placing students in unsafe work environments.

Recommendation 26: It is recommended that the Work-Integrated Learning Policy state the right of students to a work in an environment free from discrimination and harassment as well as their right to accommodation in these work experiences. Through this policy, the College should also provide a mechanism for students to raise concerns when they do occur and provide feedback about their work experience, which would allow the College to address any issues with the employer and ensure that students are not being placed in unsafe work environments.

5.5   Academic Accommodations of Students with Disabilities

Academic Accommodation of Students with Disabilities Policy

The Academic Accommodation of Students with Disabilities Policy outlines the College's commitment to providing a learning environment that promotes accessibility for persons with disabilities. The policy references the College's duty to comply with the Ontario *Human Rights Code* by providing academic accommodation to students with disabilities, "where the accommodation can be implemented without compromising the academic integrity of the program or course, imposing undue hardship on the College, or jeopardizing health and safety standards." The policy also identifies the roles and responsibilities of students, the Accessibility Centre, administration, and faculty. The policy highlights the importance of responding with sensitivity, discretion, and confidentiality. It also notes the importance of maintaining confidentiality in accordance with FIPPA and PHIPA.

No issues were found with this policy.

5.6   Safety

Assessing and Addressing Violence Policy

This policy addresses the College's duty to address workplace violence or any situation that places a member of the College community in a position that may jeopardize their personal safety on College property or during any College activity.

The policy outlines the College's commitment to do the following:

- Assess and reassess the risks of workplace violence that may arise from the nature of the workplace

- Ensure measures and procedures for summoning immediate assistance when an act of workplace violence occurs or is likely to occur

- Ensure measure and procedures are in place for reporting incidents of workplace violence

- Investigate and deal with incidents or complaints of workplace violence quickly, fairly, and effectively

- Take every reasonable precaution to protect the worker if domestic violence would likely expose an employee to physical injury in the workplace, and

- Provide information and instruction regarding workplace violence.

The policy addresses the need to maintain the confidentiality of personal information and identifies the limits of confidentiality. It also identifies that disciplinary action may be taken against those who engage in workplace violence.

The policy states that students must report any threats, attempts, or exercised acts of violence that put themselves or other members of the College community in an unsafe situation. They are also required to report workplace violence that occurs while on work placement. When a complaint is made by a student, the Dean is required to investigate the complaint and provide the student with a report of their investigation within two weeks of receiving the initial complaint.

The policy also provides procedures for reporting incidents of violence causing injury and when there is an active attacker incident.

The policy specifies the responsibility of the Director, Human Resources or designate to investigate the complaint and provide the complainant with a report of their investigation within two weeks of receiving the initial complaint.

Bill 168 came into effect in 2009 as an amendment to the *Occupational Health and Safety Act* to address workplace violence and harassment. While the College's Assessing and Addressing

Violence Policy meets some of the requirements of the Bill, it fails to fully comply with Bill 168 by failing to:

- Address the requirement to review the policy as often as is necessary, but at least annually

- Require that the policy be posted in a conspicuous place in the workplace, and

- Set out how incidents or complaints of workplace violence are to be investigated.

Recommendation 27: It is recommended that the Assessing and Addressing Violence Policy be updated to ensure full compliance with Bill 168, and that procedures be developed to support the policy's implementation.

Sexual Assault and Sexual Violence Policy and Protocol

In 2015, the Ontario government passed the *Sexual Violence and Harassment Action Plan (Supporting Survivors and Challenging Sexual Violence and Harassment) Act*, which requires colleges and universities to develop a sexual violence policy. This legislation also creates specific duties for all employers to develop policies and procedures to prevent sexual harassment in the workplace, including a duty to investigate incidents and complaints.

The Sexual Assault and Sexual Violence Policy and Protocol commits the College to confronting and preventing sexual violence and to supporting members of the College community affected by sexual assault. The policy states that sexual violence is unacceptable and will not be tolerated at Lambton College. It commits the College to creating a safe space for anyone in the College community who has been affected by sexual violence, and not only responding to acts of sexual violence when reported, but also engaging in public education and prevention activities.

The policy:

- States that sexual violence can be experienced by individuals no matter their sexual orientation, gender, gender identity, or relationship status

- Describes interim measures for safety, the right to withdraw a complaint, and the right to protection from reprisals, retaliation, or threats

- States that those who make complaints found to be frivolous, vexatious, or made in bad faith will be subject to discipline

- States that the complainant is the final decision maker about their own best interests and may choose not to make or proceed with a complaint or make a report to the police

- Dispels myths and misconceptions about sexual violence

- States that a complainant who reports sexual violence while also breaching College policy will not be subject to discipline for these breaches. However, the College reserves the right, in exceptional circumstances, to address the reported breaches of policy.

- States that the College will protect the complainant from irrelevant questions such as those relating to past sexual history or sexual expression.

While this policy is strong, it can be strengthened by:

- Specifying the rights of the complainant and respondent in the investigation process

- Providing examples of the breaches that students will not be disciplined for when disclosed during a sexual violence investigation, such as the use of alcohol or drugs, or having unauthorized guests in their residence rooms

- Encouraging faculties and departments to include education related to rape culture and sexual violence in course materials and program curriculums where appropriate

- Specifying the rights of the complainant and respondent in the investigation process

- Including sexual assault services for Indigenous, 2SLGBTQ+, and international students on the list of available services, and

- Requiring the College to analyze the data on the number of reported incidents of sexual violence in order to identify trends and any further proactive measures that may be needed.

Recommendation 28: It is recommended that the Sexual Assault and Sexual Violence Policy and Protocol be revised to:

- Specify the rights of the complainant and respondent in the investigation process

- Provide examples of the breaches that students will not be disciplined for when disclosed during a sexual violence investigation, such as the use of alcohol or drugs and having unauthorized guests in their residence rooms

- Encourage faculties and departments to include education related to rape culture and sexual violence in course materials and program curriculums where appropriate

- Specify the rights of the complainant and respondent in the investigation process

- Include sexual assault services for Indigenous, 2SLGBTQ+, and international students on the list of available services, and

- Require the College to analyze the data on the number of reported incidents of sexual violence in order to identify trends and identify any further proactive measures that may be needed.

COVID-19 Vaccination

This policy is designed to prioritize a safe and healthy place to work, teach, study, and conduct research. It applies to all members of the College community and specifies the conditions under which individuals will be permitted to enter the College campus. The policy specifies that:

- Individuals are required to be vaccinated as a condition to enter the campus for any reason

- On-campus activities will align with federal, provincial, and public health regulations and guidance related to the COVID-19 pandemic, and

- Individuals wishing to enter the campus must submit proof of vaccine.

The Ontario Human Rights Commission has issued a policy statement on COVID-19 vaccine mandates, which states the following:[33]

> While receiving a COVID-19 vaccine remains voluntary, the OHRC takes the position that mandating and requiring proof of vaccination to protect people at work or when receiving services is generally permissible under the *Human Rights Code* (*Code*) as long as protections are put in place to make sure people who are unable to be vaccinated for *Code*-related reasons are reasonably accommodated.

> Upholding individual human rights while trying to collectively protect the general public has been a challenge throughout the pandemic. Organizations must attempt to balance the rights of people who have not been vaccinated due to a *Code*-protected ground, such as disability, while ensuring individual and collective rights to health and safety.

The policy statement goes on to address personal preferences and singular beliefs:

> Receiving a COVID-19 vaccine is voluntary. At the same time, the OHRC's position is that a person who chooses not to be vaccinated based on personal preference does not have the right to accommodation under the Code. The OHRC is not aware of any tribunal or court decision that found a singular belief against vaccinations or masks amounted to a creed within the meaning of the Code.

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[33] Ontario Human Rights Commission. (2021, September 22). *OHRC policy statement on COVID-19 vaccine mandates and proof of vaccine certificates*. https://www.ohrc.on.ca/en/news_centre/ohrc-policy-statement-covid-19-vaccine-mandates-and-proof-vaccine-certificates

While the Code prohibits discrimination based on creed, personal preferences or singular beliefs do not amount to a creed for the purposes of the Code.

Even if a person could show they were denied a service or employment because of a creed-based belief against vaccinations, the duty to accommodate does not necessarily require they be exempted from vaccine mandates, certification or COVID testing requirements. The duty to accommodate can be limited if it would significantly compromise health and safety amounting to undue hardship—such as during a pandemic.

The College's policy addresses the need to provide accommodations based on human rights grounds, saying that:

Lambton will consider exemptions on an individual basis received from students, employees, and long-term contractors relating to medical grounds and/or because of their creed/religion. Approved exemptions based on these grounds will be accommodated up to the point of undue hardship. However, such accommodation may be provided through measures other than being granted access to campus.

The College also makes available a document with frequently asked questions that addresses questions such as the following:

- Why is Lambton making COVID-19 vaccines a condition of being on campus in fall 2021?
- How will I show proof that I am vaccinated?
- I want to request a medical and/or creed/religious exemption. What steps do I take?
- Will masks and physical distancing be required on campus in fall 2021?
- I have not been vaccinated but would like to be. What do I do?

No issues were found with this policy.

5.7   General Administration

Free Speech Policy

Institutions had until January 1, 2019, to develop, implement, and comply with a free speech policy that meets a minimum standard prescribed by the provincial government, with progress to be monitored by the Higher Education Quality Council of Ontario. Universities and colleges that fail to comply may be subject to a reduction in operating grant funding.

Lambton College's Free Speech Policy defines freedom of expression as "the right to speak, write, listen, challenge and learn," and states that it "must be protected as it is essential to

discovery, critical assessment and the effective dissemination of knowledge and ideas and leads to social and economic advancement." It goes on to state that:

> Colleges must be places that allow for open discussion and free inquiry where diverse voices can be heard and ideas and viewpoints can be explored and discussed freely and debated openly without fear of reprisal, even if these are considered to be controversial or conflict with the views of some members of the college community. Although colleges greatly value civility and all members of colleges share responsibility for maintaining a climate of mutual respect, it is not the role of colleges to shield members of the college community from ideas and opinions that they may find disagreeable or offensive. It is up to individuals and not colleges to make such judgments for themselves and to debate and challenge ideas that they find unacceptable.

It states that while members of the College community are free to criticize and contest the views of others, they may not obstruct or interfere with the freedom of others to express their views.

The policy also recognizes the limits of free speech:

> Speech that violates the law, including the Ontario *Human Rights Code*, is not allowed. Speech that constitutes harassment, a threat or hate speech is not allowed. Other context-specific boundaries to freedom of expression may also apply, such as those arising out of the terms of employment and collective agreements.

No issues were found with this policy.

Respectful College Community Policy

This policy commits the College to providing a safe and respectful community environment for employees, students, members of the Board of Governors, members of committees, contractors, clients, visitors, and guests. It "recognizes and confirms the right of every member of the College community to teach, learn and work in a safe and respectful environment free of harassment and discrimination."

The policy:

- Addresses all conduct, "including but not limited to, on-campus conduct, off-campus conduct and internet-based conduct that engages the College's duty to provide a safe and harassment-free College community"

- Requires each member of the College community to behave in a safe and respectful manner that contributes to a community that is free of harassment, bullying, and discrimination, in an environment of understanding and mutual respect for the dignity and rights of each individual

- States that students who believe that they have experienced or witnessed harassment, discrimination, or bullying are to contact the Registrar

- Commits the College to considering all complaints, whether made informally or formally, to ensure that they are resolved quickly, confidentially, and fairly

- States that it does not prevent or limit a complainant from contacting the Human Rights Tribunal of Ontario, and

- Identifies vexatious or bad faith allegations and reprisals as violations of the policy, and states that those who make a false complaint or engage in reprisal will be subject to disciple.

The policy includes an internal resolution process that allows the complainant or respondent to be accompanied by a support person who may be a co-worker, friend, union representative, or a representative from the Student Administrative Council. The process includes an informal complaint process, mediation, and a formal complaint process. These processes appear to apply to staff. Students alleged to have contravened the policy will be dealt with under the Student Rights and Responsibilities and Discipline Policy, which does not allow for an investigation process for students accused of harassment.

This policy was compared to the Ontario Human Rights Commission's guidelines for anti-harassment and anti-discrimination policies.[34] That review found that this policy could be strengthened by:

- Committing the College to providing training and education to make sure everyone knows their rights and responsibilities

- Specifying the rights of the complainant and respondent in the investigation process

- Requiring the College to analyze the data on the number of reported complaints, how they were resolved, as well as the grounds and types of complaints in order to identify trends and identify any further proactive measures that may be needed, and

- Defining sexual and gender-based harassment and condonation, and including them as violations of the policy.

Recommendation 29: It is recommended that the Respectful College Community Policy be revised to address the identified issues and ensure full compliance with the Ontario Human Rights Commission's guidelines for anti-harassment and anti-discrimination policies.

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[34] Ontario Human Rights Commission. (2013). 5. Anti-harassment and anti-discrimination policies. In *A policy primer: Guide to developing human rights policies and procedures*. https://www.ohrc.on.ca/en/policy-primer-guide-developing-human-rights-policies-and-procedures/5-anti-harassment-and-anti-discrimination-policies

Smoke Free Campus Policy

This policy recognizes the health hazards associated with smoking and exposure to second-hand smoke and commits the College to ensuring a healthy working and learning environment for those in the College community.

The policy also recognizes the use of tobacco in Indigenous cultural and spiritual practices as follows:

> Lambton College recognizes that the traditional use of tobacco forms Indigenous culture and spirituality and involves smoking or holding lighted tobacco as well as the burning of sweetgrass, sage and cedar (as provided under the *Smoke-Free Ontario Act, 2017*). These uses of tobacco, etc. on College property should be coordinated with and approved by the Director, Facilities Management or delegate.

No issues were found with this policy.

Supporting Transgender and Transitioning College Community Members Policy

This policy applies to all members of the College community and supports the College's responsibility to ensure that transgender students enjoy an environment free from harassment and discrimination. It commits the College to:

- Taking reasonable steps and measures to be supportive, understanding, respectful, responsive, and accommodating of those who have gone through, who plan to, or who go through gender transition, or are otherwise developing their gender identity or gender expression while at the College, and

- Taking every reasonable step to ensure that its learning, working and living environment is maintained consistent with the Respectful College Community policy.

The policy states that anyone who makes a vexatious or bad faith complaint, or who takes reprisal against someone who has made a complaint or cooperated in an investigation, will be subject to disciplinary action.

The policy also:

- States that disclosing the "gender information or transgender status or intention of an individual outside of the grounds permitted under law and policy is a breach of confidentiality and will be treated by the College as such, including associated disciplinary measures"

- States that self-identification is the sole and whole measure of a person's gender

- Allows for a change of personal information on record with the College

- States the expectation that all members of the College community use gender-inclusive language

- Commits the College to ensuring the availability of safe, appropriate washrooms, including all-gender washrooms at every campus, and that all members of the College community are able to use segregated washroom facilities consistent with their lived gender

- Commits the College to ensuring that students have access to safe, private change-room facilities that correspond to their gender identity; residence accommodation that is inclusive, safe, and respectful; and full and equal participation in intramural sports, fitness, or recreational activities

- Addresses dress and grooming, and

- States that forms will not have exclusively binary gender options.

While this policy addresses a number of areas related to trans students, it does not fully address the needs of students who may be transitioning while studying at Lambton. The transitioning individual usually changes their name, clothing, and appearance to coincide with their gender identity. This process may also encompass physical changes resulting from hormone therapy and gender confirmation surgery. Because of existing stereotypes in society, many transgender individuals face difficult situations and interactions simultaneously in their personal, professional, family, and financial lives. This can lead to high stress levels, particularly when individuals are in the initial stages of transitioning.

As such, it is important that the individual be supported in an open and honest way to allow a smooth transition in the workplace. It is also imperative that the organization have a policy and guidelines in place to support this transition. This policy should recognize that each individual transitioning is dealing with a set of unique circumstances that will require a customized plan.

Recommendation 30: It is recommended that Lambton make ongoing education available to staff, faculty, and students about the use of preferred names and pronouns.

Recommendation 31: It is recommended that Lambton update its Supporting Transgender and Transitioning College Community Members Policy to address the needs of students who may be transitioning while studying at Lambton and the requirement that an individualized plan be created for the student.

5.8   Accessibility for Ontarians with Disabilities

Accessibility and Accommodation for All Persons Policy

This policy commits the College to:

> … providing students, clients, employees and members of the public with a learning and working environment that respects the rights of all as enshrined in the *Canadian Charter of Rights and Freedoms* and the Ontario *Human Rights Code*. Further, Lambton College is committed to providing access to opportunities for individuals with disabilities to participate fully in all employment, education, accommodation or business dealings with the College as defined by the *Accessibility for Ontarians with Disabilities Act (2005)* (AODA).

The policy addresses the need for some persons with disabilities to use assistive devices, service animals, and support persons, and the need to provide all College employees and volunteers with training on how to interact with persons with disabilities.

This policy, however, does not include the obligations of the College to develop and maintain a multi-year accessibility plan and to make it available on the College's website, as required by legislation. The policy also fails to:

- Specify that the College will incorporate accessibility criteria and features when procuring or acquiring goods or services

- Commit the college to including Universal Design for Learning to ensure accessibility for learning, and

- Address the need to ensure that students with disabilities are provided with accommodation by employers when on work placements.

Recommendation 32: It is recommended that the Accessibility and Accommodation for All Persons Policy be revised to:

- Include the obligations of the College to develop and maintain a multi-year accessibility plan and to make it available on the College's website, as required by legislation

- Specify that the College will incorporate accessibility criteria and features when procuring or acquiring goods or services

- Commit the College to including Universal Design for Learning to ensure accessibility for learning, and

- Address the need to ensure that students with disabilities are provided with accommodation by employers when on work placements.[35]

5.9   Issues Relevant to All Policies

Various policies refer to students with the masculine pronouns "he" and "his" and the feminine pronouns "she" and "her"; in other places, "he/she" is used. The use of pronouns is not inclusive to all employees.

Recommendation 33: It is recommended that during its policy review, Lambton College take the opportunity to use gender-neutral language in all policies.

5.10 Policy Gaps

In addition to the aforementioned issues, the following gaps were identified in College policies:

Accommodation

Under the Ontario *Human Rights Code*, the College has a duty to accommodate students based on any human rights protected ground, not just disability. As such, a policy to address the accommodation of student religious, Indigenous, and spiritual observance, as well as a policy to support students who are parents, would help the College meet these obligations (for example, see [Accommodation of Student Religious, Aboriginal and Spiritual Observance](#), and [Breastfeeding Guidelines](#)).

Given the occasional severity of the outcomes of hazing practices, the College may also choose to enact an Anti-Hazing Policy that prohibits student organizations, teams, groups, and their members from engaging individually or collectively in hazing activities (for example, see [Anti-Hazing Protocol | Student Affairs](#) and Policy on Hazing and Inappropriate Initiation Practices).

Recommendation 34: It is recommended that the College develop a policy to address religious accommodation and breastfeeding for students who are parents.

Recommendation 35: It is recommended that the College develop an anti-hazing policy.

5.11 Staff and Faculty Professional Development

Lambton College has offered a number of courses to staff and faulty to support their ability to engage with and instruct a diverse group of students. Some of these are described below.

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[35] Ontario Human Rights Commission. (2021, November 1). *OHRC submission on AODA Postsecondary Education Standards Development Committee's 2021 initial recommendations report*. https://www.ohrc.on.ca/en/ohrc-submission-aoda-postsecondary-education-standards-development-committee%E2%80%99s-2021-initial

Safe Spaces: This session helps staff and faculty understand why people's pronouns are so important, how to interact kindly and sensitively with folks who are transitioning, understand gender fluidity, and how to better support trans and non-binary students and staff.

Safe Spaces 1, 2, 3: These three professional development sessions helps staff and faculty understand the LGBTQ2S+ acronym, how it has evolved, the importance of using the right pronouns, gender fluidity, and more.

LGBTQ – Identities and Allyship: This session is designed to help participants be aware of the different identities people may have and how to support people who identify as LGBTQ2S+.

Safe Space Training – Gender Diversity: This session focuses on gender diversity and helps participants understand gender as a spectrum, the vocabulary, and the reasons it matters.

Positive Space Workshop: This workshop supported the positive space campaign that made visible the College's support for all students, regardless of sexual orientation and gender identity. Those who participate in the training received a removable sticker to place on their office door to identify their offices as a positive space.

Diversity and Equity Award

This award is open to all employees. It is awarded to those who complete PD modules on a number of topics including unconscious bias, ageism, feminism, LGBTQ2S+, intercultural awareness, Indigenization, disability studies, mental health, and socioeconomics.

These professional development sessions are voluntary. There are no mandatory sessions to support staff and faculty to understand and better serve or instruct the increasingly diverse student population.

Recommendation 36: It is recommended that mandatory professional development be provided to both staff and faculty, to help them better understand, serve and instruct the increasingly diverse student population.
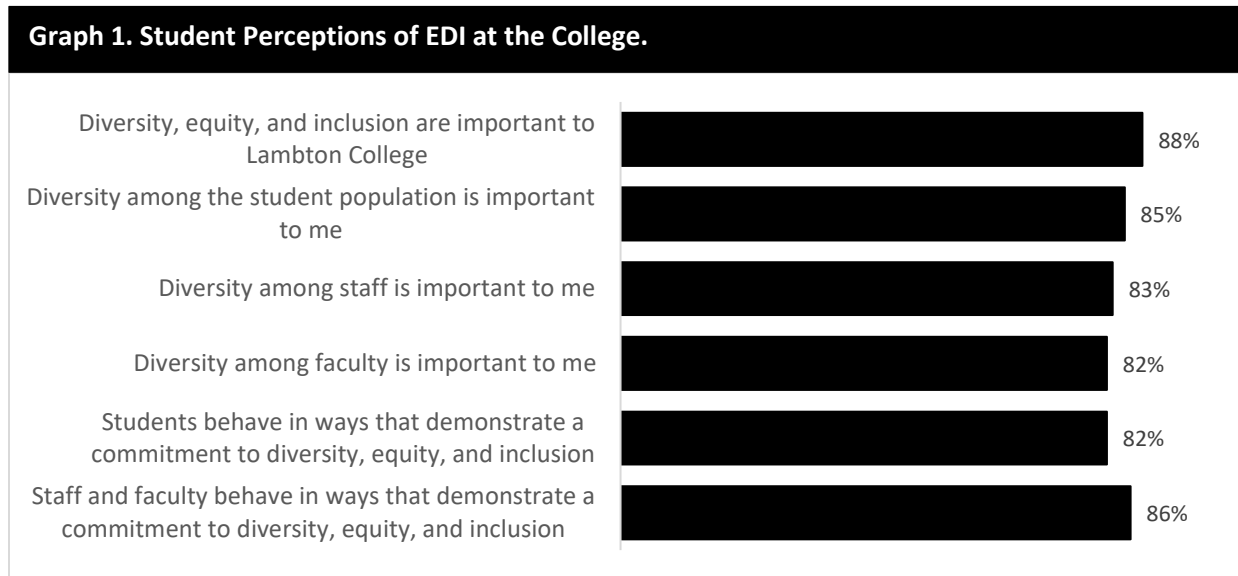
6. Student Perspectives

Of the approximately 4,000 students enrolled in Lambton College at the time this Inclusivity Assessment was conducted, only 202 responded to the survey. And while 71 students registered to participate in the focus groups, only 13 participated. Given this low participation rate, this section includes a summary of the information shared through the online survey without a breakdown for each identity group.

The sections that follow highlight the issues facing the various groups of students as described by the students themselves. Added to our understanding of the issues is the input from employees on the experiences of students, our review of information on the College website, and observations made during the campus visit. We also highlight the programs and services Lambton has in place to meet these students' specific needs, and make recommendations for what more is needed.

6.1 General Student Perceptions

The Student Inclusivity Survey asked respondents about their perceptions of the College's commitment to EDI as well as that of students, staff, and faculty.

Graph 1. Student Perceptions of EDI at the College.

Diversity, equity, and inclusion are important to Lambton College	88%
Diversity among the student population is important to me	85%
Diversity among staff is important to me	83%
Diversity among faculty is important to me	82%
Students behave in ways that demonstrate a commitment to diversity, equity, and inclusion	82%
Staff and faculty behave in ways that demonstrate a commitment to diversity, equity, and inclusion	86%

As Graph 1 shows, the vast majority of survey respondents agreed that EDI is important to the College. The vast majority also agreed that diversity among students, staff, and faculty is important to them, and that students, staff, and faculty behave in ways that demonstrate a commitment to EDI.

During the focus groups and interviews, students identified many positive aspects of the College, including:

- Inclusive, welcoming, and helpful staff and faculty
- An accessible campus
- Campus events, including cultural events, competitions, movies, site seeing, clubs, and volunteer opportunities, and
- A range of programs, many of which include practicums and co-op opportunities.

Some students also shared comments about the many positive aspects of the College:

> *Lambton College has a working environment that is brimming with positive energy owing to the communal harmony which we as students are experiencing throughout our course. The college has instructors and other staff members who are fully aware of assisting students who come from different cultural backgrounds.*

> *Each and every department is accessible with a great environment that is welcoming and inclusive.*

> *During the last Christmas tree lighting event at the college, I felt an amazing sense of community that fostered an inclusive and welcoming environment. Different groups of students representing different countries/cultures shared the spotlight in this gathering. I really enjoyed this memorable show.*

> *By having a diverse student body. While walking through the hallways, you see many different people and it is very refreshing and assuring that it is ok to be different.*

Graph 2a. Student Sense of Inclusion.

I feel welcomed at Lambton College	85%
I feel welcomed in Sarnia when I'm off campus	75%
I am able to do my best work at Lambton College	79%
I am able to make friends at this college	76%
I have opportunities at Lambton College for academic success that are similar to those of my peers	84%

The survey also asked students about their sense of inclusion at the College and in the city of Sarnia.

The vast majority (85%) indicated that they feel welcomed at the College. Some, however, noted that they don't feel welcomed at the College because they have not yet been on campus because of COVID-19 and online learning. There were also some who expressed their strong opposition to the vaccine mandate and shared that it is the reason why they don't feel welcomed at Lambton. They shared the following:

> *I was forced into vaccine denied exemption even though my religion says not to take it. Lambton college is fake, show face caring and then do the opposite.*

> *The college introduced a policy this year that directly opposes diversity, equity, and inclusion. They pretend to allow exemptions, but I know classmates who were refused legitimate exemption for the vaccine and can't attend our classes. No technology for the educators or online options were provided for them; no equitable alternative was given to those students who can't take it due to issues of religion or conscience. They are intentionally excluded, their diversity is punished, and the college makes no reach for equity.*

> *With Lambton still being closed off and not inclusive to those without a vaccine (I have medical issues but no doctor will write an exemption for me) it's very difficult to feel like I actually belong. It's messing with my mental health and I can't even talk to someone in person for the same reason.*

> *I know that they want to keep campus safe, but it's very difficult to feel like a part of Lambton when they won't allow you to even step foot onto campus.*

There were also students who shared their opposition to equity efforts by the College. They stated:

> *Get rid of the foreign students and make it a school of nothing but Canadians.*

> *Hire the best person for the job and not the person that meets an inclusivity quota.*

> *As a white heterosexual cis male, Lambton College has become a place I feel I am not special enough to belong to. In fact, I, like many other males, am thinking of dropping out and forgoing higher education as I feel I am not welcome and do not belong despite having a 3.7 gpa last year. Thanks Lambton...*

Students also identified a lack of diversity among staff and faculty along with perceptions of discriminatory treatment by students, staff, and faculty as a challenge to their feeling included at Lambton. Some felt that there is a lack of cross-cultural understanding, which could be remedied by educating all members of the College community about other cultures:

> *I feel Lambton should have more gatherings for people to get to know one another. It would make it feel like a more welcoming environment.*

> *Host more on campus activities and informational seminars to further educate staff and students on diversity, equity and inclusivity.*

While still the majority, only 75% reported feeling welcomed in Sarnia when off campus. Some students shared their love of the city:

> *Sarnia is great it's my hometown. I enjoy all the outdoor things there are to experience.*

> *Sarnia is a beautiful place to learn and start a new life for me as an international student.*

> *I moved to Sarnia 8 years ago. I am not disappointed, Sarnia has so many things to benefit the community. Including ample summer activities down by the water.*

Others shared their concerns about how they and other students are treated by local residents:

> *Sarnia is a wonderful small city, not much to do (I really like District Beta, nice place to meet up with friends). But I do find that some of Sarnia can have some racial issues, I've heard and seen some not so nice actions towards Indians, Indigenous Peoples, and Black Individuals (BIPOC community).*

> *Also within our community, there is a great deal of transphobia and homophobia. Even to the extent that a person who attended one of our Drag shows felt that it was okay to ask a performer if she could grope her. As well people will constantly ask if someone is a boy/girl/gay/trans/bi—which is basically asking what kind of genitals do you have or how do you use them, and with who. Therefore, people that claim to be "allies" have horrible behaviour—we need more queer hubs in the community so that people can feel safe and others can be educated.*

> *Sarnia is very conservative. Conservative people tend to not like people who are different. Also, very Christian and vocal about hate of other religions.*

> *Sarnia does not seem very progressive and does not have a lot of representation by POC. City council and newspaper photos show a very homogenous community. Recently, while visiting a road side fruit stand to buy food, I was asked by another customer if I worked there. I don't know why she asked, but I felt like it was because my skin is dark.*

> *I am very fortunate to have white privilege, the opportunity to be university educated, constant love and support from my family and friends, and being part of a family with a higher socioeconomic status. However, I have heard of students being harassed because they are part of the queer community, or are international students.*

As Graph 2a shows, 79% of students feel that they are able to do their best work at Lambton, while 84% feel that they have opportunities at the College for academic success that are similar to those of their peers.

In addition, 76% agreed that they are able to make friends at Lambton College. In the comments, a number shared that this is largely due to COVID-19, the inability to be on campus, and the lack of opportunities to socialize with other students. As some shared:

> *It has been a little tough to connect to make friends outside of class. Some classes we don't really have time to connect and it's more about schoolwork.*

> *It is difficult to connect with people virtually, so making friends is hard. The only time I have made friends was in in-person classes.*

Students were also asked to comment on the impact of COVID-19 on their college experience. They shared mixed experiences, but all generally agreed that COVID-19, and the resulting need for online learning, has changed their college experience. For some, particularly those who live in Lambton, they shared that they appreciated the convenience of online learning. Students with disabilities also shared the positive impact of learning online. Many also shared that the instructors have done an excellent job making the learning engaging:

> *I love having a virtual classroom. It makes things so much easier for me to do things. There's no getting ready in the morning, driving to the college, paying for parking, and trying to find a decent parking spot.*

> *The teachers at Lambton College have done a very great job at adapting to virtual learning. They make the online education experience just as great as it was in class.*

> *I think our professors are doing an incredible job at not only educating their students but ensuring we leave understanding the practical applications of it for our future careers. I couldn't be more impressed with the understanding and compassion my instructors have had during my struggle with discovering the depths of my disability (ADHD) and its impacts on my mental health this term. And the fact that my instructors can demonstrate that level of heart and sympathy, virtually, truly shows what an amazing faculty you have. I also truly hope you have their best interest at heart when going to the negotiation table, because they are worth more than you know!*

> *I personally have loved schooling from home. I am neurodivergent, and this provides a safe space for me to learn and function in my own way, where I wouldn't have been able to do so at school. The program delivery is also extremely user friendly and well done. One thing I would like is for all classes to be recorded for future viewing in case of connection issues.*

> *Amazing atmosphere, full of new learning opportunities and fruitful interactions.*

> *I like the lessons, conversation, and teaching during virtual classroom.*

Some also found online classes less stressful and noted that it is easier to ask questions:

> *The virtual classroom was accessible and easy to use when asking questions about assignments.*

> *Sometimes I feel shy to ask questions in person, but in the virtual classroom I can easily drop a message to make my doubts clear.*

> *I prefer the virtual classroom to in-person classes. I feel more comfortable when I am able to work from home and not forced to speak when it makes me uncomfortable.*

> *My social anxiety is something I hardly have to worry about now. I feel safer doing schooling at home. I feel more comfortable and relaxed doing schooling at home. My depression has improved GREATLY since online schooling.*

Others, however, shared their challenges with engaging in online learning and the negative impacts of learning online:

> *Having everything online has been difficult, there is no chance to make friends or get the true college experience. It is important to have that community of students in your program so you can help each other and feel as though you aren't alone in your struggles. Also, a lot of the time it feels like you are teaching yourself.*

> *COVID took away a big chunk of my college experience. I'm making the most of it with my 2 classes in person a week, but online learning is very hard for me, it's not something I excel at. Finding motivation to do it is hard but I'm doing it.*

> *It has been emotionally draining, I feel like a recluse now so I am nervous about in-person but I am looking forward to it more.*

> *Very difficult for focusing and motivation, feels lonely.*

> *It has made the Canadian dream monotonous instead of adventurous.*

> *I find online learning to be more stressful and less personal. I can't connect as effortlessly with my peers or professors. I find it difficult to join in a conversation and maintain focus through an online platform.*

Some also feel that they are having difficulties learning in the online environment partly because of the quality of online teaching:

> *COVID has created a difficult learning environment due to the lack of in-person lessons when the material is not fully understood. I eventually resort to watching YouTube videos to grasp some of the concepts.*
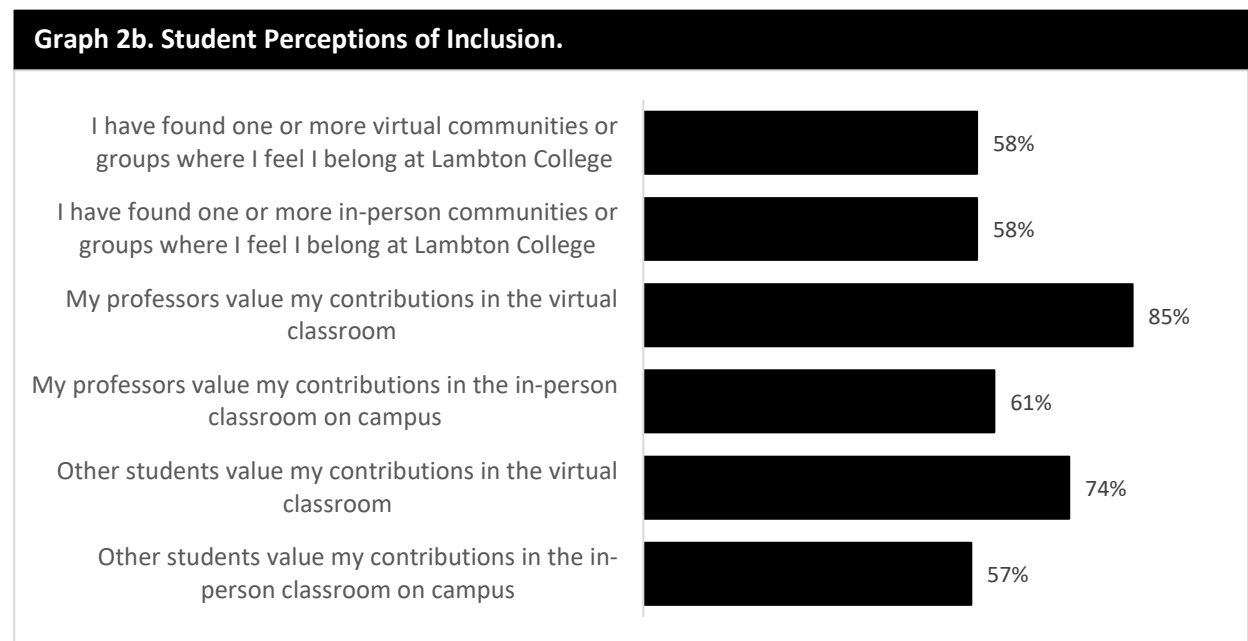
When in the virtual classroom, it is hard to understand lab courses since I was unable to be involved in the hands-on environment. I feel like I was at a great disadvantage to other students.

Its dull sometimes, it is an environment that is what you make it however for kinesthetic leaners and visual learners its hard to apply a lot of information taken in without more of a classroom environment.

Some teachers just don't know how to teach virtually. I don't feel like I'm getting the education I'm paying for.

Graph 2b shows students' responses to additional questions about their sense of inclusion. Fifty-eight percent of survey respondents agreed that they have found one or more virtual or in-person communities or groups where they feel they belong. A number commented that they are not aware of the clubs or student activities available to them and that more could be done to advertise these opportunities.

Graph 2b. Student Perceptions of Inclusion.

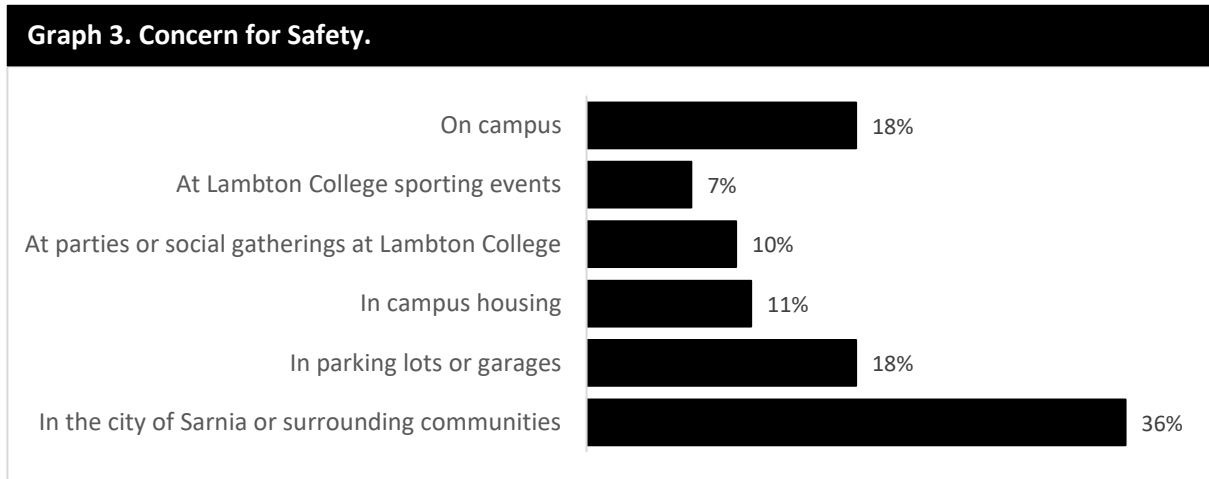| Statement	Percentage
I have found one or more virtual communities or groups where I feel I belong at Lambton College	58%
I have found one or more in-person communities or groups where I feel I belong at Lambton College	58%
My professors value my contributions in the virtual classroom	85%
My professors value my contributions in the in-person classroom on campus	61%
Other students value my contributions in the virtual classroom	74%
Other students value my contributions in the in-person classroom on campus	57%

A larger proportion of students feel that their contributions are valued more in the virtual than in the in-person classroom by both professors and other students. While 85% reported that their professors valued their contributions in the virtual classroom, 61% agreed that their professors valued their contributions in the in-person classroom. Similarly, 74% agreed that other students valued their contributions in the virtual classroom, and 57% agreed that their contributions are valued by other students in the in-person classroom.

The Student Inclusivity Survey also asked students how often they have been concerned about their physical safety since becoming a Lambton student. Graph 3 includes those who responded that they have been concerned sometimes, often, or always.

Many students shared that they have been studying virtually and have not been on campus and therefore have no safety concerns. For those who did indicate that they had safety concerns, they were more likely to have concerns in the city of Sarnia or surrounding communities than on campus.

Graph 3. Concern for Safety.

On campus	18%
At Lambton College sporting events	7%
At parties or social gatherings at Lambton College	10%
In campus housing	11%
In parking lots or garages	18%
In the city of Sarnia or surrounding communities	36%

Survey respondents shared that there are a few things in place that make them feel safer on campus, including the app that provides for a virtual follower and the visibility of security officers on campus.

Women shared some of their concerns for their physical safety and offered some suggestions for what more could be done to increase their safety and address issues when they do occur:

> *Need more security, more lighting, safety buttons, buddy programs, etc.*

> *It is great that the residence has so many informative posters talking about sexual assault, but I wish we could actually have virtual meetings or something that actually discusses and defines what assault or harassment looks like. I am not sure some of the ladies or gentlemen know that assault or harassment is not just unwanted touching. It can be things said in passing or the way someone talks to you.*

> *More severe consequences for men who stalk and harass female students.*

> *Dark parking lots are kinda spooky (I do really appreciate the walking group at night). As a female I don't think fear of places will go away easily, especially at night.*

Classes late at night make it harder to see people in the parking lot. A lot of new trees and bushes for people to hide behind on campus.

Survey respondents were asked about their experiences of discrimination and harassment at Lambton College.

As Graph 4 shows, small proportions reported experiencing discrimination (19%) and harassment (12%) at Lambton College. Larger proportions reported hearing subtle insensitive comments or seeing insensitive behaviours (26%) or hearing or witnessing overt acts of harassment or discrimination (18%).

Graph 4. Experience of Discrimination and Harassment.
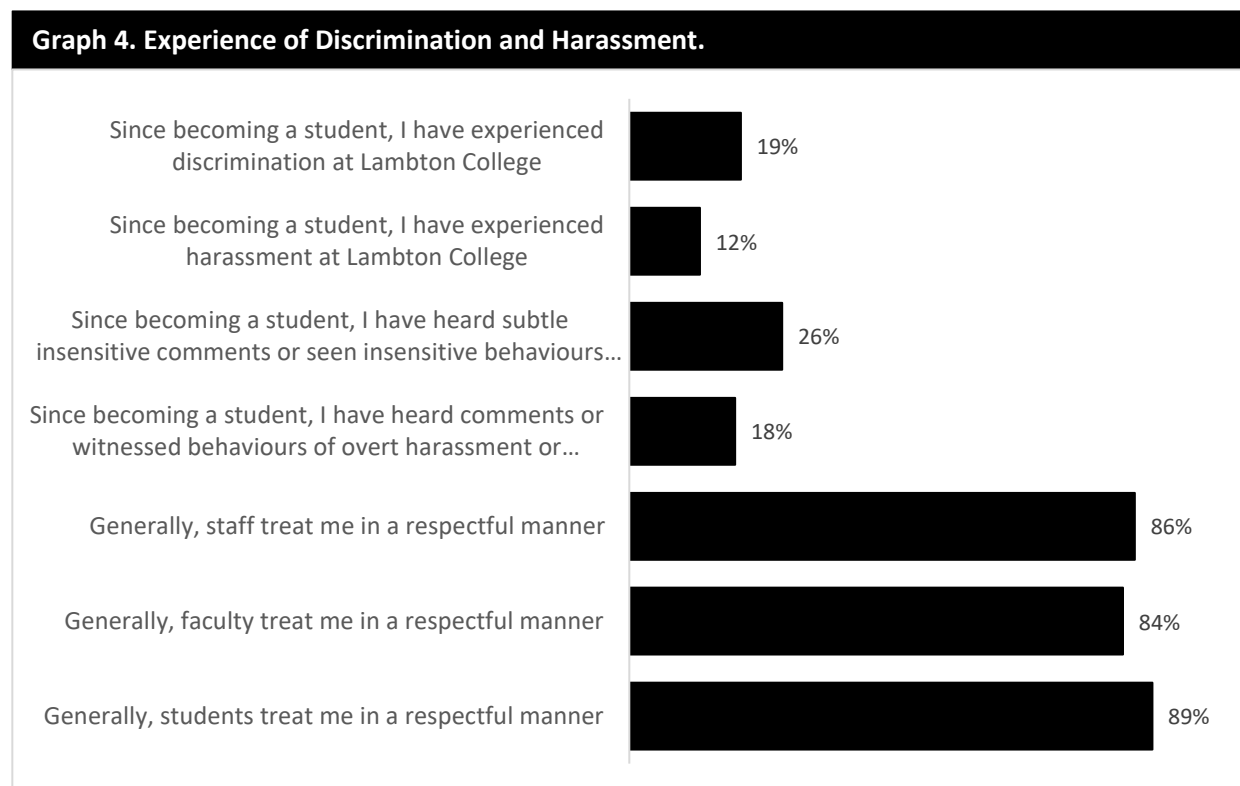
Despite these concerns, the majority of survey respondents indicated that, generally, staff, faculty, and students treat them in a respectful manner.

The experiences shared by students included differential treatment not only by students, but also by staff and faculty:

- Negative treatment by students

    The school has made an effort and it is clear. Just wish some more of the student body could be as inclusive and less judgemental/offensive to minorities.

> *It feels like I am not welcome here by domestic students.*

- Negative treatment by staff

> *50% of my interactions with [staff in this department] left me feeling anxious and feeling physically sick.*

> *A few of those who work [in one service area] can be very rude sometimes.*

- Negative treatment by faculty

> *Old male teachers love to pick on students who aren't from Canada. Like simply IGNORING them or talking to them like their question isn't important. I've been told that "you're an adult, figure it out" by a teacher when I asked about when I'll need a textbook because he wasn't sure when we were going to start needing it. I was told to "grow up."*

Both students and employees shared their concern that inappropriate behaviours toward students are not always appropriately addressed. Women raised their concerns that the behaviours of men who have harassed them have not been addressed, and that they have had to continue attending classes with these men. Indigenous and international students raised their concerns about the negative treatment by staff and faculty, and their fear of making a complaint because of the potential impact on them. Concern was also raised that there are some groups of male students (e.g., sports teams or specialized programs) whose inappropriate behaviours toward women (both students and employees) are not addressed because of their status at the College. As one person commented:

> *When I was telling him what was happening, he said, we don't stand for this. This is wrong. I can't believe they would do that. What are their names? So I give them the list of names and they're like, oh, yeah sorry, you're going to have to correct this on your own. They're on the award winning... team, and there's no way we're going to pull them or discipline them for that because the College gets recognized for their awards and we promote it. So, there's no possible way we're going to discipline them. So, you're going to have to deal with that on your own. And it was so bad that during the final exam, they were [cheating] and I couldn't do anything about it because no one had my back.*

Faculty also shared their concerns about the challenges of creating a safe space for students in the classroom and addressing issues when they do occur.

> *Students are harassing female students in [this] program if they are not satisfied with their grades. Instructors are not feeling supported to address it.*

> *It's challenging. Because of the power dynamic in the classroom it is my job to create a safe place it is my role to educate and use it as a teaching moment and educate everyone in that space so it was not a problem going forward. That should be the norm. But there is no training. There should be mandatory workshops on harassment and*

unconscious bias to make our community safe so we can help and self-police that. We should have to have skills to do that.

6.2   Indigenous Students

Lambton currently has about 130 self-identified Indigenous students, with plans to increase that number to about 200 students in the coming years.

In 2015, Lambton College signed the Colleges and Institutes Canada Indigenous Protocol, which has committed the College to the following seven principles:

1. Commit to making Indigenous education a priority

2. Ensure governance structures recognize and respect Indigenous Peoples

3. Implement intellectual and cultural traditions of Indigenous Peoples through curriculum and learning approaches relevant to learners and communities

4. Support students and employees to increase understanding and reciprocity among Indigenous and non-Indigenous Peoples

5. Commit to increasing the number of Indigenous employees with ongoing appointments throughout the institution, including Indigenous senior administrators

6. Establish Indigenous-centred holistic services and learning environments for learner success, and

7. Build relationships and be accountable to Indigenous communities in support of self-determination through education, training, and applied research.

The College supports the full inclusion of Indigenous students in the following ways:

- Indigenous Student Centre was first established in 1992. It is a designated space for Indigenous students and provides a friendly, supportive environment for these students. It is equipped with study carousels/tables, a workspace, a computer area, kitchen facilities, and a lounge area. The Centre provides access to academic advising, traditional Elders, visiting speakers, tutoring, academic and cultural workshops, laptop/iPad loan program, and lunch program.

- All Indigenous students are encouraged to register with the Indigenous Student Centre through the Self-Identification Form. This helps with the planning and delivery of more effective services. It also allows the Indigenous Student Centre to directly communicate with Indigenous students about bursaries or other financial assistance, invite students to participate in cultural events, and refer students to support services. By connecting with the Indigenous Student Centre, it also helps create a sense of community and pride among Indigenous learners.

- The Council on Indigenous Education acts as a liaison between Indigenous communities and the College to disseminate information about programs, scholarships and bursaries, and recruitment of students.

- The partnership between Lambton College, Mohawk College, McMaster University, and Wilfrid Laurier University creates a college-to-university pathway program and creates opportunities for Indigenous Studies students to advance their post-secondary education.

- The Indigenous Student Council works with the Indigenous Student Centre to supports a sense of community for Indigenous students while they study at Lambton College.

- One of the three mandatory modules that international students are required to complete prior to coming to registration includes information on Canada's history, which includes information on Indigenous Peoples.

- The professional development opportunity, Four Seasons of Reconciliation, has been offered as an ongoing educational opportunity for all faculty and staff.

- Members of the College community are encouraged to participate in Orange Shirt Day to acknowledge the harm of the residential school system and injustices to Indigenous Peoples, and to demonstrate a commitment to reconciliation.

- The construction of an Indigenous Outdoor Gathering Space is currently being planned.

- The establishment of the Aamjiwnaang First Nation PSW program and Enactus Lambton's One Circle project.

- The Foundation has worked with the Indigenous Education team and Facilities and IT departments to create College Study Hubs in local First Nations communities, supporting Indigenous student success in the online learning made necessary by COVID-19.

- Adoption of Guidelines for Research in Collaboration with Indigenous Peoples.

- Commitments to advancing Truth and Reconciliation in collaboration with Indigenous communities are written directly in the College's Strategic Plan (2019–2024). These commitments include enhancing Indigenous student engagement as reflected in improved access, retention, graduation, and employment rates; embedding Indigenous culture and history in all post-secondary program curriculums; and reflecting culturally Indigenous perspectives, art, and traditions on campus.

- Lambton College recently formed a Truth and Reconciliation Committee that is tasked with considering the recommendations of the Truth and Reconciliation Commission of Canada and the Calls to Action along with other pertinent documents and reports, and with developing recommendations to advance Truth and Reconciliation at Lambton.

In 2021, Lambton College was the Bronze recipient of the Indigenous Leadership Excellence Award. The award recognized the College's commitment to Indigenous education through its innovative approaches and dedicated structures that contribute to student success, as well as socio-economic development and reconciliation within communities.

Throughout the consultations, Indigenous students shared the positive experiences they'd had at the Indigenous Student Centre and the supports they have been able to access at the Centre. While many shared that they have experienced a welcoming and inclusive environment at Lambton, some students and employees also shared that they'd had negative experiences, such as the following:

> *Personally, I think certain teachers could do a better job at ignoring the fact that I am native or do a better job at covering up the fact they don't like me but it is what it is. I will always deal with people not "liking" me per se all because of my culture, so I believe to better the inclusive learning environment and a more welcoming environment they should educate certain educators on all of the different cultures and ethnicities they will encounter over the course of coming semesters.*

> *I've spoken with students one on one. And the things that I've heard are that tokenism. So, students who are racialized or other than some way, are either completely invisible in the classroom or they are treated as a like if you're going to talk about Indigenous issues and this one Indigenous student, like they're put on the spot to say, hey, what about this?*

> *Personally, I think my... professor is a racist. I feel he is always personally attacking either myself and my friend, who are the only two Native Americans in the class. He won't speak to me when I ask him something other than a simple nod of the head and if someone else asks a question and they aren't a person of colour he is so friendly and the absolute opposite of how he is to us. I don't appreciate it, and it makes me dread going to class.*

> *I have heard of instances of students showing discrimination towards other students, one had students bullying an Indigenous student in the class last year. She did take it to the Dean, the Dean spoke to the class about the inappropriateness of that behaviour, and it did not fully stop but he did try to put a handle on it. There were no evident repercussions to the bully.*

> *Not to make it obvious that someone is different because of their different ethnicity. I just want to be treated like anyone else not called out because you read a book about Native Americans and making a connection with the only Native student in the class. It personally makes me feel outed.*

Given these experiences, the College could do more to foster inclusive and anti-racist living, learning, and working environments for Indigenous students, and providing safe mechanisms

for students to raise and have their concerns addressed. In addition, the following issues and gaps were identified through this audit:

- Professional development regarding reconciliation is not mandatory for faculty and staff
- Learning about Indigenous Peoples is not mandatory for students, and
- There are very few Indigenous faculty and staff.

The Indigenous Student Centre is currently staffed by three individuals, who provide supports to about 200 students. Many of these 200 students need additional supports to navigate the College owing to a number of barriers, including intergenerational trauma, multiple life challenges, Western education, lack of role models, and negative attitudes toward them. Additional support would help address these barriers and support their graduation.

Recommendation 37: It is recommended that Lambton College provide and fund additional supports in the Indigenous Student Centre to address the needs of and provide support to Indigenous students in navigating the College environment.

Recommendation 38: It is recommended that Lambton College prioritize the hiring of Indigenous faculty and staff.

Recommendation 39: It is recommended that the College prioritize embedding learning about Indigenous history and culture into program curriculums and student orientation materials.

Recommendation 40: It is recommended that the College mandate professional development for staff and faculty on Indigenous history and culture and reconciliation.

Recommendation 41: It is recommended that the College provide safe mechanisms for Indigenous students to raise and have their concerns addressed about their treatment in Lambton classrooms and while on work placements.

6.3   2SLGBTQ+ Students

Post-secondary institutions are challenged to create a welcoming and inclusive environment for 2SLGBTQ+ students, particularly given two current trends. The decades of gains made in Canada toward 2SLGBTQ+ inclusion has led to more young people being comfortable sharing their gender identity and sexual orientation at younger ages. Despite this progress, there is a resurgence of open homophobia and transphobia in Canadian society, with a prominent Canadian professor gaining increased notoriety for his criticisms of political correctness on campus in general, and his refusal to use pronouns outside of "he/him" and "she/her" in particular. Recent activity on American university campuses and to some extent in Canada

show a trend toward a louder voice for anti-inclusion groups, including those opposed to 2SLGBTQ+ rights.

The College demonstrates its support of the full inclusion of 2SLGBTQ+ students in the following ways:

- The Supporting Transgender and Transitioning College Community Members Policy allows for students to use their preferred names and to change their names on official College records. It also addresses the need for the College to create inclusive change rooms, washrooms, and forms, among other things.

- The College has single-user gender-inclusive washrooms on each campus to ensure that trans and non-binary students, employees, and visitors have access to washrooms.

- The installation of a Rainbow Crosswalk on campus symbolizes the inclusion of 2SLGBTQ+ people.

- A free online mini-course entitled Exploring Diversity and Equity: LGBTQ Identities is available to the public. The course explores some key topics related to sexual orientation and gender identity.

Throughout the consultations, students and employees shared their perspective about issues facing 2SLGBTQ+ students at Lambton College. Some students shared that they'd had some very positive experiences, including the following:

> *Being transgender, I've had a great experience with my ESP for things like name changes and such.*

> *In my experience they've all been great with respecting pronouns and chosen names. They've been wonderful with accessibility access and encouraging students to use the help that is offered.*

Some also shared that more is needed to create more welcoming and supportive environments and services for 2SLGBTQ+ students:

> *I would really like to see better queer representation on campus (whether in person or virtual). When I visited the GSA Lambton Facebook group (which the name needs to be updated as I find incorporating the term straight a bit archaic with what Lambton College is trying to achieve here), it also hasn't been updated in a long while. I feel Lambton College could benefit from a Pride group, especially when it comes to a person's identity and using proper pronouns. [I] would love to help foster a safe space for our community.*

We need more counselling services and events involving the LGBTQ+ community. More hands on learning.

Frontline employees should receive sensitivity training. Everyone is well meaning, but if a student's gender is ambiguous, they don't know how to address them.

In addition to making single-user washrooms available, the College could support students to use the washroom of their choice. Students at various post-secondary institutions have reported being questioned by their peers or that security was called when they used the washroom that corresponded with their gender identity. The Ontario Human Rights Commission states that "a trans person should not be required to use a separate washroom or change room because others express discomfort or transphobic attitudes."[36] To support trans, gender-non-conforming/non-binary individuals' right to use the washroom of their choice, some institutions have posted signs to remind the entire campus community that students and employees can use the washroom that corresponds with their gender identity. For example, at George Brown College, the following sign is posted on the doors of the gendered washrooms:

> Safe access to bathrooms is not a luxury or a special right.
>
> I know who I am.
>
> Assume I belong.

In addition, 2SLGBTQ+ students noted the lack of visibility of 2SLGBTQ+ students and employees on campus. While they welcomed the Rainbow Crosswalk, they felt that more could be done to address the issue of visibility to increase their sense of belonging at the College. For example, some post-secondary institutions have created positive space campaigns to foster 2SLGBTQ+ inclusive campus environments. Included in these campaigns are Pride celebrations that correspond with the Pride week in the local community. These campus events are used to not only celebrate the 2SLGBTQ+ communities but also educate the campus communities about 2SLGBTQ+ issues, such as the following activities:

- George Brown College includes information for 2SLGBTQ+ students on its public-facing [website](#), including information on chosen/preferred name process, training and education, references and resources, and student networks and clubs.

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[36] Ontario Human Rights Commission. (2014, January 31). *Policy on preventing discrimination because of gender identity and gender expression* (p. 39). https://www.ohrc.on.ca/sites/default/files/Policy%20on%20preventing%20discrimination%20because%20of%20gender%20identity%20and%20gender%20expression.pdf

- University of Toronto offers a number of [positive space materials](#) that can be displayed in workspaces, classrooms, and residences.

- Algonquin College has developed a [Positive Space campaign](#) to celebrate the 2SLGBTQ+ community and to foster a safe and accepting environment for all students. The campaign trains a network of College employees to help ensure that 2SLGBTQ+ students, faculty, and staff feel visible, supported, and knowledgeable about the issues and resources on campus.

- Conestoga College flies the [Pride flag](#) in honour of Pride month.

Students also noted that there is no consistency to the 2SLGBTQ+ student club on campus. Its existence solely relies on students to lead it. As a result, it is operational in some years, but not in others.

Some students also shared their concern about how issues related to 2SLGBTQ+ people are dealt with in the curriculum, with some sharing concerns that stereotypes are being taught and reinforced by some instructors, or that the 2SLGBTQ+ communities are ignored altogether in some programs.

Recommendation 42: It is recommended that the College institute a positive space campaign to foster an inclusive college environment for 2SLGBTQ+ students, which includes the flying of the Pride flag to recognize Pride Month.

Recommendation 43: It is recommended that the College include information related to 2SLGBTQ+ students on its public-facing website.

Recommendation 44: It is recommended that the College work with the Student Administrative Council to support the consistent and ongoing existence of the student group for 2SLGBTQ+ students and their allies.

Recommendation 45: It is recommended that the review of programs and curriculums include the embedding of accurate information about people who identify as 2SLGBTQ+.

Recommendation 46: It is recommended that posters and communications to the College community support trans students to use the washroom consistent with the person's identity.

Recommendation 47: It is recommended that staff and faculty receive mandatory training to support their understanding of 2SLGBTQ+ issues and to create a more welcoming and supportive environment.

6.4 Students with Disabilities

Lambton College has a number of policies and programs in place to address the needs of students with disabilities, including the following:

- The Academic Accommodation of Students with Disabilities Policy, which supports the access of academic accommodation.

- The Accessibility Centre, which offers counselling, accommodation planning, learning strategies and assistive technology instruction, as well as other accessibility supports and advocacy for students.

- The Counselling and Wellness Centre, which provides access to counsellors and health professionals, outreach programs that help students develop coping strategies, and support groups to help make the transition to college life an easier one.

- Community Integration through Co-operative Education (CICE) program is a fully integrated 2-year College certification program. This is a modified program designed for individuals with learning disabilities, developmental disabilities, brain injuries, and other related learning challenges. The program accepts up to 20 students a year and provides them with an opportunity to enhance their academic skills through integrated college classes while also developing their vocational abilities through career-based field placements and experiential learning opportunities.

- The Foundation worked with a community partner to establish a unique wellness fund of $14,000, which is available to the College's highest needs students who were facing issues like housing insecurity and mental health crises.

In addition, through its multi-year accessibility planning, supported by the College AODA Committee, the College has addressed accessible student services, accessible formats and communication supports, facilities management, and teaching and learning.

As shared earlier in this report, students shared that they were facing a number of mental health challenges due to the COVID-19 pandemic, the shift to online learning, and the limited opportunities to socialize with their peers. Students shared that they have experienced harassment and discrimination based on their disabilities, particularly from their instructors:

> *Most harassment and discrimination when it comes to disability comes from teachers not students.*

> *My friend told her professor that she was in the hospital for a mental health crisis and can she please have an extension on her test and she said she has too many mental health crises and failed her on that test.*

I've heard from students with disabilities about some of our faculty not wanting to provide specific accommodation because they believe that it compromises the academic integrity and rigour of their course. That can be a challenge as students don't want to bring it up because if it becomes public, there can be blow back.

In recognition of the increased mental health issues faced by students at post-secondary institutions, in May 2017 the Ontario government announced $6 million in additional funding over a 3-year period. This funding was in addition to the annual $9 million already provided to post-secondary institutions and the funding provided to every college and university in Ontario to hire a mental health worker on campus to work directly with students.[37] The Ministry shared data showing that between 2004 and 2014 there was a 400% increase in registered students who had mental illness disabilities within Ontario's post-secondary institutions.

The Canadian Association of College and University Student Services and the Canadian Mental Health Association put together *Post-Secondary Student Mental Health: Guide to a Systemic Approach* as part of the commitment to strengthen student mental health.[38] The guide offers a framework for addressing student mental health in post-secondary institutions through a systems-wide approach to create a campus environment that is conducive to mental health and learning. It covers the following areas:

- Institutional structure: organization, planning, and policy

- Supportive, inclusive campus climate and environment

- Mental health awareness

- Community capacity to respond to early indications of student concern

- Self-management competencies and coping skills

- Accessible mental health services, and

- Crisis management.

Mental health issues in young adults are brought about not just by the typical challenges facing their cohort, but also by living, learning, and working environments that are not welcoming, respectful, and inclusive of diverse identities. The health effects of racism, homophobia, transphobia, and other forms of oppression have been well documented,

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[37] Currie, A. (2017, May). Ontario boosts funding for post-secondary mental health services by $6 million. *The Varsity*. https://thevarsity.ca/2017/05/04/ontario-boosts-funding-for-post-secondary-mental-health-services-by-6-million/

[38] Canadian Association of College and University Student Services and Canadian Mental Health Association. (2013). *Post-secondary student mental health: Guide to a systemic approach.* https://healthycampuses.ca/wp-content/uploads/2014/09/The-National-Guide.pdf

leading to an increased chance of developing not only physical health issues but also psychotic episodes, depression, and anxiety.[39] As a result, efforts to create a more welcoming and inclusive campus environment support better mental health for all members of the campus community.

Many anticipate that the post-pandemic needs of young people will increase dramatically. While the COVID-19 pandemic has impacted all Ontarians, some groups are more likely to report declining mental health:[40]

- Young adults aged 18 to 24
- Indigenous Peoples
- Individuals belonging to the 2SLGBTQ+ communities
- Women, and
- Those with pre-existing mental or physical health concerns.

Various studies of K–12 students as well as post-secondary students have found that since the pandemic began, fewer students are expressing happiness and hopefulness. At the same time, there has been an increase in anxiety, learning issues, loneliness, and stress.[41]

The increased needs of students will ripple through the College in the coming years, impacting not only learning environments but also the counselling and wellness services that students will need access to. These services will need to adapt in order to reflect the diverse needs of Indigenous students and students from the equity-seeking groups.

A number of survey respondents also commented on a range of accessibility issues at the College, which would create barriers and challenges to employees with disabilities. These issues include the following:

- Accessibility issues in washrooms

    Accessible washrooms are hard to come by. In some, it seems that the setup would not work for someone in a wheelchair (e.g. soap dispenser out of reach).

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[39] Healthy Place. (2017, July 9). *Racism is harmful to your mental health*. https://www.healthyplace.com/anxiety-panic/articles/racism-is-harmful-to-your-mental-health/

[40] Centre for Innovation in Campus Mental Health. (2021). *The impact of COVID-19 on post-secondary institutions*. https://campusmentalhealth.ca/wp-content/uploads/2021/06/CICMH_COVID-19_Impact_Infosheet_EN.pdf

[41] Ibid.

We are getting better with the building upgrades, but I know students who use wheelchairs and motorized devices struggle to reach the soap dispensers that were placed behind the paper towel dispensers on the washroom walls.

- Poor lighting

Poor lighting in old building. Would be difficult with mobility issues with only the single elevator.

- Ramps

The library ramp is unpleasant to use for someone in a wheelchair.

The library ramp is impossible to navigate. It means that some students aren't able to access the library.

- Distance to access elevators, ramps, or accessible doors

The sheer distance someone needs to travel to access a ramp, elevator, or an accessible door is too far.

- Doors

We need to replace some of the old heavy classroom and office doors that won't stay open and don't have automatic buttons.

Hoping during renovations door sizes are looked at for allowing larger/wider wheelchairs entry.

There are doors that students in wheel chairs cannot open and need to wait for assistance—even in the new end.

I find the campus to be hit or miss with accessibility. There have been numerous times that an automatic door opener isn't working.

- Access to certain spaces

Classes and labs are not all accessible and the only access to the fitness centre is not wheelchair accessible. People in wheelchairs would require someone to intentionally let them in from the back hall.

Some indoor spaces are difficult to navigate as well. The front/main hallway that connects A building to B building is especially difficult - there's a ramp/hill that is often slippery. I can't imagine that using a wheelchair or cane would be easy in that space

- Inadequate directional signage, and
- Need for more accessible parking and closer to the main entrances.

The following recommendations are made to address the identified issues:

Recommendation 48: It is recommended that a mental health strategy be developed to identify the current increasing needs of students as well as the increased needs to come resulting from the COVID-19 pandemic.

Recommendation 49: It is recommended that ongoing supports and training be provided to faculty to support their ability to teach students with increased mental health needs.

Recommendation 50: It is recommended that counselling and wellness supports be increased and diversified to meet the needs of 2SLGBTQ+, Indigenous, and international students.

Recommendation 51: It is recommended that an accessibility audit be conducted to identify accessibility issues and support a multi-year plan that prioritizes and addresses the issues.

6.5   Racialized Domestic Students

The murder of George Floyd in 2020 and the resulting racial reckoning that has swept across the world has also impacted Canadian post-secondary institutions. This movement built on the existing work of Black students and Black Lives Matter in both the United States and Canada to draw attention to anti-Black racism through demonstrations, hunger strikes, and social media campaigns. Students' concerns include the lack of Black studies courses, the paucity of Black students and faculty, and the anti-Black racism experienced in interactions with students, staff, and faculty.[42] Furthermore, students across American and Canadian campuses have used social media and campus newspapers to highlight the microaggressions and racism that Black and other racialized students experience from other students as well as from faculty (e.g., Harvard University,[43] University of Toronto,[44] York University,[45] and Queen's University[46]).

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[42] Habtemariam, S., & Hudson, S. (2016, March 1). Canadian campuses have a racism problem. *Toronto Star*. https://www.thestar.com/opinion/commentary/2016/03/01/canadian-campuses-have-a-racism-problem.html

[43] Vingiano, A. (2014, March 3). 63 Black Harvard students share their experience in powerful photo project. *BuzzFeedNews*. https://www.buzzfeednews.com/article/alisonvingiano/21-black-harvard-students-share-their-experiences-through-a

[44] Robin, I. (2016, January 10). Out of the shadows: The manifestations of racism on Campus. *The Varsity*. https://thevarsity.ca/2016/01/10/out-of-the-shadows/

[45] York University Black Graduate Student's Collective. https://www.facebook.com/YorkBGSC/

[46] Rawhani, A. (2015, February 27). Racism alive but subtle at Queen's. *The Journal*. https://www.queensjournal.ca/story/2015-02-27/features/racism-alive-subtle-queens/

In November 2021, colleges and universities from across Canada launched the Scarborough Charter, which follows through on promises made by these institutions to move from mere rhetoric to meaningful action to address anti-Black racism and promote Black inclusion.[47]

Racialized students are also advocating to address other forms of racism, including Islamophobia.[48] As students advocate to address racism, resistance to these efforts and more open expressions of racism and Islamophobia can be anticipated and will require strong anti-racism efforts in response.

As described by many students and employees, Lambton College does not have a large number of Black and racialized students on campus, other than international students. The students that it does have tend to be Black students recruited to play on the men's basketball team. As this is the only place that students and employees see Black people on campus, it may serve to reinforce the stereotype that Black people are athletically but not academically inclined.

The lack of Black and racialized domestic students may have some feeling that anti-racism should not be a priority for the College. However, it is in White spaces and institutions that racism is able to flourish. In addition, if Lambton is educating students to work in an increasingly global and diverse labour market, it needs to ensure that faculty embed anti-racism and anti-oppression into their pedagogy and curriculums.

Recommendation 52: It is recommended that Lambton College prioritize the hiring of Black and racialized faculty and staff.

Recommendation 53: It is recommended that the College promote the development of curriculums that incorporate world-inspired learning, including through the addition of Black and racialized expertise and knowledge, in order to broaden the Western-centric canons of its programs.

6.6 International Students

The College continues to recruit international students in support of a sustainable College enrollment and the community's immigration strategy. In the coming years, Lambton College's enrollment of international students on the main campus will increase to 2,100 students per year.

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[47] *Scarborough Charter on Anti-Black Racism and Black Inclusion in Canadian Higher Education: Principles, actions, and accountabilities*. https://designrr.page/?id=140172&token=1735715840&type=FP&h=9346

[48] Vendeville, G. (2018, January 2016). Islamophobia in Canada: Muslim students share their personal experiences. *U of T News*. https://www.utoronto.ca/news/islamophobia-canada-muslim-students-share-their-personal-experiences

To support international students, the College has put the following measures in place:

- Three part pre-arrival orientation course that address topics and issues such as visas and permits, health insurance, housing options and supports, adjusting to a new culture, academic integrity, how grades are determined, Canadian culture, safety in Canada, and Canada's history, including information on colonization, treaties, residential schools, and reconciliation.

- Live virtual orientation sessions and workshops that include the Director's welcome and address academic integrity, student services, immigration, and tutoring and writing centre.

- International Student Welcome Guide that includes information on adjusting to Canadian culture, orientation week, College services and resources, community services and resources, support services, getting involved, health and wellness, medical insurance, and safety and security.

- In the community-driven Local Immigration Partnership's Settlement Strategy under the Facilitation Pillar, activities are held to increase connections between the College's international students and services in the community. Activities are also organized to educate residents of Sarnia about the services offered to international students and to ensure that international students studying at the College feel safe, secure, and welcomed in Lambton County.

- WhatsApp groups organized by program area.

Throughout these consultations, many people commented on the value that international students bring to the College and to the city of Sarnia. As one person shared:

> *Getting a larger Indian community from the international program, Sarnia has its largest international population ever. They brought a vibrance to the community, culture, and ways of life. They are staying at home stays and lots of business comes from them such as more Indian restaurants and international grocery stores. There are lots of good things.*

Despite these supports, international students and employees identified the following issues and challenges:

- Discrimination by students: Some employees shared overhearing slurs being used in reference to international students. Some international students also shared some examples of poor treatment by domestic students.

- Discrimination by faculty that often goes unaddressed

  I have coached many students who felt harassed by other faculty, the students do all the right things and nothing happened.

During in-person classes, some teachers can be quite patronizing if someone asks a question they don't think is important.

- Racism in the community

  Most of these students are gone on the weekend, they go to Toronto, they stay with friends, and they just get out of here. So, it's becoming a real problem.

  People here in Sarnia are not ready to accept us. I sometimes feel very sad because of their behaviours. They look at us weird. They don't like to talk to us.

  People in Sarnia are racist.

- Access to housing: The housing options for international students are limited because of the current housing market and the competition from oil workers, who are able to pay more for housing. In addition, staff shared that there are a number of people who won't rent to international students for a number of reasons, including racism.

  People just won't rent to international students. I don't know where they're going to live. I think that we live in a community that can really be unaccepting at times. I don't think we can overstate this being an issue here. And I think when you have people calling you up yelling at you that they don't want international students in their neighbourhood, I think you got to really wonder what's going on here.

  It should expand on-campus residence facilities so that they can provide more space to international students so that they can stay near the college premises. In that way, students won't be struggling to find accommodation and it would be a conducive environment for all learners.

- Insufficient public transportation within Sarnia requires that students rely on ride shares, which are costly

- On-campus food options: Despite the large number of international students, the on-campus food options don't appear to appeal to the palates of these students.

- Separate programs and courses: Both domestic and international students shared their challenges with the separate program streams for students. International students shared that they came to Canada to learn and make friends with Canadian students. Some students shared feeling out of place in classes made up predominantly of international students, particularly when the vast majority come from one country.

  If I wanted to study with only Indians, I would have stayed in India.

  Increase the diversity of international students. Mix the classrooms because 98% are students from India and the ones who come from other countries feel left out.

Sometimes, I feel like I don't belong in class because the majority of my classmates are from India, and if I don't understand what they are saying I think I'm just overthinking that they are talking about me.

- English language ability: Some faculty shared concerns that while international students are required to pass an English-language test in order to be accepted at Lambton, their experience with some students is that they don't have the needed grasp of the language to do well in their courses. They shared that students arrive at Lambton unable to meet the basic requirements of the courses and are reaching out to instructors on a daily basis for assistance, causing instructor burnout.

  If we can ensure that students here are ready to be here in terms of language, it would go a long way. Clearly several students have not passed the language proficiency test. They faked it somehow. And now they are saying "you have to help me, my family has sacrificed everything for me to be here, you have to help me."

- Academic integrity: Concern was frequently raised about cultural differences related to academic integrity and the need to better educate international students about Canadian norms regarding plagiarism.

  Right now, we have a bias about international students. They come with background and perspective regarding academic integrity. Not because you are an international student it means you are prone to plagiarism. That is a label. That worries me in terms of faculty unfairly judging international students. At Lambton you can visually tell who is an international or domestic student more than other campuses. Here it is more visible and I worry because I do hear this—are they being unfairly judged and monitored more than domestic students.

- Location and appearance of the prayer space

- Lack of consideration of religious holidays for international students when scheduling tests and other activities

  Acknowledge important holidays from other cultures. Last term the first day of class was on a big holiday for the students from India, and they were not all able to attend class. I felt like this was not very respectful of their culture.

Recommendation 54: It is recommended that a policy on religious observance be developed to commit the College to respecting the beliefs and practices of all members of the community and making accommodations for observances of special significance by making every effort to avoid scheduling in-class or formal examinations on days of special religious significance throughout the year. A calendar of holy days should be compiled annually and distributed widely on campus. Students should also be informed of procedures for requesting and arranging accommodations.

Recommendation 55: It is recommended that the College ensure that food, wellness, and other services reflect the cultural needs of international students.

Recommendation 56: It is recommended that the College work with the city and other public and private sector partners to develop an anti-racism campaign to increase the acceptance of international students in the Sarnia-Lambton community.

Recommendation 57: It is recommended that staff and faculty receive appropriate training to support their ability to support, teach, and positively interact with international students.

Recommendation 58: It is recommended that the College explore integrating classes and providing social and other venues through which domestic and international students are able to learn and socialize together.

Recommendation 59: It is recommended that the College recognize the limited housing options available for international students and consider any increase in their numbers in Sarnia relative to the availability of appropriate housing.

6.7   Female Students

Questionable activities held for first-year students, allegations of sexual assault, and a growing list of universities failing to adequately respond to students' allegations of sexual assault have focused the attention of the media, the public, and universities themselves on sexual violence and campus rape culture.[49] These events, along with initiatives by the provincial government, have helped colleges and universities to focus their efforts on sexual violence prevention.

To address these issues, Lambton has put the following measures in place:

- Sexual Assault and Sexual Violence Policy and Protocol to establish expectations for preventing, reporting, and addressing sexual assault and violence when they do occur
- Posters and information on campus for students

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[49] See for example:

Coutts, M. (2014, March 3). University of Ottawa latest campus dragged into debate over 'rape culture'. *Yahoo! News*. https://ca.news.yahoo.com/blogs/dailybrew/university-ottawa-latest-campus-dragged-debate-over-rape-190550593.html

Zeilinger, J. (2015, September 2). College women sound off on the disturbing sexism they face every day. *Mic Daily*. https://mic.com/articles/124284/college-women-sound-off-on-the-disturbing-sexism-they-face-every-day#.2n9kkB2jg

Adams, P. (2014, March 12). Do Canadian universities foster a 'rape culture?' *University Affairs*. http://www.universityaffairs.ca/opinion/in-my-opinion/do-canadian-universities-foster-a-rape-culture/

- Sexual Assault Advisory Task Force, established in 2016, responsible for providing thoughtful, objective, and strategic leadership to the implementation of sexual violence prevention, awareness, and education initiatives, including policy development and supports

- Sexual Violence Action and Education Plan, which includes 20 objectives with associated actions and timelines, and

- An annual report on Sexual Violence Prevention on Campus on matters related to the experiences of and supports offered to students affected by sexual assault.

Some female students shared experiences of being included and accommodated by instructors based on child care responsibilities. However, some also shared their concerns about not only sexual harassment and violence, but also discriminatory treatment. These issues include the following:

- Sexist treatment by other students

   My point of view has been invalidated [by other students] because I am a woman. I have been ignored because of my gender.

   We have a lot of racist and sexist people at the college and a few men I don't feel safe around. One man in [my program] harassed, sexually harassed and stalked a few girls in the program including myself to the point I don't feel comfortable in class with him, and the teachers just gave him a warning from what I understand.

- Sexist treatment by faculty

   Some teachers offer more help and resources to resources to male students. They are in general nicer and more including to male students.

Employees also shared overhearing comments or jokes objectifying women, suggesting that they are "less than" because of their sex or gender. They also shared that female students have reported that faculty are discriminating against them because of their gender. While these students are encouraged to make a complaint, they refuse to because they are afraid of the impact it may have on their learning and work opportunities.

A number of employees also shared their concern that Lambton is not treating sexual assault with the seriousness it deserves and is not committing the needed resources to keep all women safe on campus. They shared that while various initiatives are promoted, such as the sexual assault prevention ambassador position and training for staff, they shared their concern that the position is not permanent but rather a co-op placement, and that only staff in the residence have received this training.

Given the issues of safety that female students continue to face on campus, this is one area where Lambton needs to be vigilant if the College is to create and maintain safe learning and

living environments on campus. This includes the provision of training for employees and incoming students, ongoing annual training for returning students on the topic of consent, as well as sharing policies and procedures on how issues will be handled when they do occur.

A notable gap at Lambton is the clear articulation that accommodation will be provided to support students to attend to family responsibilities as well as a policy to support breastfeeding by students who are parents. It is important to note that while students have the right to breastfeed anywhere on campus, locations specifically suited for students who need to breastfeed or pump breastmilk should be identified.[50]

Recommendation 60: It is recommended that Lambton develop and make mandatory consent training for all new students.

Recommendation 61: It is recommended that the sexual assault prevention ambassador position be made permanent and staffed with someone who has the necessary background and expertise in sexual assault prevention.

Recommendation 62: It is recommended that Lambton inform students, staff, and faculty about a student's right to breastfeed anywhere on campus and provide breastfeeding guidelines to protect, promote, and support breastfeeding.[51]

Recommendation 63: It is recommended that a campus safety audit be conducted to assess the physical environment and features, policies and practices, social dynamics, programs, services, and resources on campus. Given the diversity of students and employees, and the issues and concerns of those from diverse communities, backgrounds, and identities, it is particularly important to apply an equity lens to this safety audit.

6.8   Additional issues

Social Justice Club

Formed in 2015, the Social Justice Club is a student-led organization that was formed in conjunction with the College's Centre for Social Justice. The Club has established a food bank on campus in response to growing food insecurity among students and has promoted Orange Shirt Day and anti-racism events. It hosts "Coffee House Sessions," through which students can discuss issues and actions at various locations throughout the campus. Surveys are used to gain insight into leading student concerns, which include sexual assault, politics, and mental health.

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[50] Breastfeeding Friendly Campus Initiative. http://www.bfcampuses.ca/

[51] Dalhousie University. (n.d.). *Breastfeeding guidelines*. https://www.dal.ca/dept/hres/human_rights_discrimination/accommodation/breastfeeding-guidelines.html

Ongoing learning

In order to create a more inclusive campus environment, many post-secondary institutions have made EDI training or courses mandatory for students, including training on consent, anti-Black racism, and Islamophobia. This will help create inclusive classroom environments, but also support positive interactions outside of the classroom.

For example, the University of Waterloo's Equity Office hosts lectures on equity topics, as well as workshops for students, staff, and faculty. Examples of workshop topics are as follows:

- Addressing Unconscious Bias in Evaluation Processes (employees)

- Equity Fundamentals (e-learning course for students)

- Equity, Diversity and Inclusion: What is in it for me? (students)

- Promoting Equity: A Respectable and Inclusive Workplace (employees)

- Equity Considerations in Recruitment and Selection (faculty)

- Promoting Equity: Leading the Change (employees)

- Promoting Equity: The Duty to Accommodate Employees (for chairs, directors, managers, and employees)

- The Duty to Accommodate Students (for faculty, instructors, and teaching assistants)

- An Equitable Workplace: Recognizing the Rights of Transgender Persons (for managers and employees)

- Making Spaces for LGBTQ+ Persons (employees)

In addition, the University of Waterloo's Organizational and Human Development department has created a Principles of Inclusivity certificate program, which explores relevant themes and provides practical suggestions for practising and promoting inclusivity, through seven half-day workshops. The Equity Office also hosts workshops and lectures as part of Waterloo's annual staff conference on Indigenization programming.

While the University of Winnipeg originally said it is "the first university in the country to mandate that all students will learn about Indigenous Peoples," similar requirements are in place or in the works at two other Canadian universities.

The University of Regina has a mandatory Indigenous course requirement for students in its Faculty of Arts. Lakehead University requires students to take a minimum of one course with at least 50% Indigenous content.

Recommendation 64: It is recommended that all staff and faculty receive human rights training so that they understand their legal obligations and develop the skills to create learning and working environments free from harassment and discrimination.

Recommendation 65: It is recommended that a range of workshops be offered to students, staff, and faculty to support the creation of a welcoming and inclusive living and learning environment on campus.

Recommendation 66: It is recommended that an Inclusivity Committee be established to support and guide the implementation of the Inclusivity Strategy.

Appendix A: Policies and Documents Reviewed

2020 Annual Status Report (AODA)
Academic Accommodation of Students with Disabilities Policy
Academic Freedom—Rights and Responsibilities Policy
Academic Program Prioritization, Revitalization and Rationalization Policy
Accessibility and Accommodation for All Persons Policy
Appeal of an Academic Decision Policy
Application and Admission to Programs Policy
Assessing and Addressing Violence Policy
Assessing, Addressing, and Serving the High-Risk Student Policy
College Advisory Council Policy
COVID-19 Vaccination Policy
Free Speech Policy
General Education Policy
Grades and Academic Averages Policy
Post-Secondary Timetabling Policy
Program Advisory Committees Policy
Program Curriculum Development, Review, Revision, and Documentation Policy
Program Quality Assurance Policy
Progression and Graduation from a Program Policy
Registration Policy
Respectful College Community Policy
Sexual Assault and Sexual Violence Policy and Protocol
Smoke Free Campus Policy
Student Program Forums Policy
Student Request for Review Instruction Policy
Student Rights and Responsibilities and Discipline Policy
Supporting Transgender and Transitioning College Community Members Policy
Test and Exam Writing Protocol Policy
Use of Recording Devices on Campus Policy
Work-Integrated Learning Policy