



Fair, safe and productive workplaces

Labour

Employment Equity in Your Workplace Federal Contractors Program

STEP 2 – Employment Systems Review

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Introduction

The results of your organization's workforce analysis provide a detailed breakdown of the representation of the four designated groups in your workplace. If under-representation was found, the next step in the employment equity process is to complete an employment systems review to identify the barriers that contribute to these gaps.

The results of your employment systems review will provide your organization with a solid foundation on which to develop an employment equity action plan that, if implemented with reasonable efforts, will result in reasonable progress toward full representation.

The purpose of an employment systems review is five-fold:

- 1) to identify all your human resources systems policies and practices;
- 2) to analyze these policies and practices to determine how they may have a different impact on designated group members compared to those who are not members of a designated group;
- 3) to identify which of these policies and practices create barriers;
- 4) to provide a basis for corrective action to remove barriers; and
- 5) to assess the potential for reasonable accommodation to overcome valid barriers (i.e., barriers that exist because of a bona fide occupational requirement and are consistent with human rights legislation).

The data retrieved from your workforce analysis (i.e., gaps in representation) is used to focus your review of all formal and informal human resource systems, policies and practices that may be causing under-representation. If your workforce analysis reveals areas of over-representation of specific designated groups, use this information to improve representation in areas where gaps exist.

In this section, you will use data collected in your flow data analysis and clustering analysis if they were conducted to focus your review on specific problem areas and particular employment systems. For example, if your flow data analysis reveals that hiring is low for a particular designated group but the number of terminations does not pose a problem, then recruitment and selection might be the area requiring the most detailed analysis.

Objective of the Employment Systems Review

*The central goal of the employment systems review is to provide a reasonable explanation for any significant gaps in representation uncovered by the workforce analysis. Few employment systems reviews will identify **all** barriers, and there often may not be a clear, precise barrier that quickly and fully explains a gap. There will sometimes be a number of policies and practices that, operating together, contribute to creating or sustaining gaps.*

Recommendations made in your employment systems review, if implemented with reasonable efforts, will result in reasonable progress toward closing gaps in representation over the lifetime of your employment equity plan.

By following the instructions provided in Step 2: Employment Systems Review, your organization will conduct an employment systems review that meets the Federal Contractors Program Requirements. To assist you further in this task, a number of tools and templates are provided in appendices 2D through 2H at the end of this guide.

The next section provides background and summary information on the employment systems review. This includes:

- a summary of the legislative framework, including requirements under the *Employment Equity Act*, the *Employment Equity Regulations* and the Federal Contractors Program Requirements;
- a series of key points to remember;
- a list of tools and templates included in this document; and
- a summary of the basic methodology for conducting an employment systems review.

Legislative Framework

As an organization implementing employment equity in its workplace, you are required to conduct an employment systems review under the *Employment Equity Act*, the *Employment Equity Regulations* and the Federal Contractors Program Requirements.

The Employment Equity Act

Subsection 9(1)(b) of the *Employment Equity Act* requires your organization to conduct a review of its employment systems, policies and practices in order to identify employment barriers against the designated groups that result from these systems, policies and practices.

Employment Equity Regulations

Section 8 of the Regulations states that employers must conduct a review of their employment systems, policies and practices to determine whether any of these constitutes a barrier for designated group members.

Subsection 9(1) states that employers must review the impact of their employment systems with respect to:

- (a) recruitment, selection and hiring;
- (b) training and development;
- (c) promotion;
- (d) retention and termination; and
- (e) reasonable accommodation of the special needs of designated group members.

Subsection 9(2) requires your organization to review periodically any new employment systems, policies and practices that are implemented after the initial employment systems review.

Federal Contractors Program Requirements

Requirement 5 outlines the requirements for an employment systems review, which your organization must fulfil by:

- ✓ conducting an extensive review of all formal and informal employment policies and practices, to eliminate systemic, actual or potential barriers to employment that may exist in the ways your organization recruits, selects, hires, develops, trains, promotes, retains, terminates and accommodates employees;
- ✓ modifying any policies and practices that might discourage designated group members from applying for employment or participating fully in your organization's opportunities and benefits; and
- ✓ demonstrating that all policies and practices used at all levels of your organization where human resource decisions are made are bias-free toward designated group members.

Now that you have an understanding of your organization's obligations under the relevant legislation, please review the following three key points to keep in mind while conducting your employment systems review.

Key Points to Remember

As in previous steps of the implementation process, a continued focus on communication, consultation and record keeping is crucial to a successful employment systems review. These elements reinforce your organization's commitments and provide for greater transparency and accountability.

Communication

Regularly communicating with employees, managers, bargaining agents and employee representatives fosters an environment of understanding, commitment and support that will contribute to the success of your organization's employment systems review.

At a minimum, a communication is required at the beginning of the review to announce its initiation and at the end to announce its results.

Consultation

Consulting with employees, managers, bargaining agents and employee representatives during your employment systems review is of particular importance. Information provided in these consultations may contribute to the identification of policies, practices and attitudes. The result will be a thorough and accurate identification of barriers and their impact on applicants and employees who are members of a designated group.

Your organization is encouraged to conduct informal interviews, surveys or focus groups to improve your understanding of how workplace policies and practices have an impact on those involved in your workforce.

Record Keeping

Appropriate record keeping of the steps your organization has taken to conduct an employment systems review is also important. Keeping electronic or hard-copy records of the process will allow your organization to revisit its employment systems review for potential errors and may be used as evidence of correct procedure during a compliance review. Your organization will find a number of templates and tables that will assist in record keeping in the appendix.

Tools and Templates

Step 2 provides your organization with a number of tools and templates to help you complete your employment systems review.

Tools

- *Employment Systems Review Results Table (Appendix 2E)*
- *Frequently Found Barriers (Appendix 2F)*
- *Employment Systems Review Policies and Practices Diagnostic Tool (Appendix 2G)*

Templates

- *Communications Templates (Appendices 2D and 2H)*

Summary of Methodology

When conducting your employment systems review, you must examine all formal and informal policies and practices related to the following employment systems:

- recruitment, selection and hiring;
- training and development;
- promotion;
- retention and termination;
- reasonable accommodation; and
- attitudes and corporate culture.

Appendix 2G provides a diagnostic tool that may be used to review your organization's formal and informal policies and practices and assess their potential adverse impact, legality, consistency, validity and accommodative nature.

You must also consider how attitudes and your organization's corporate culture could potentially create barriers to employment or an environment of discrimination. To complete these tasks, you must consult a number of individuals who are involved in or affected by your organization's policies and practices, including employees who are members of a designated group and employees who are not, management/supervisory staff, bargaining agents, employee representatives, and human resources staff.

Recording Employment Systems Review Findings

As you conduct your organization's employment systems review, you must record your findings in the employment systems review results table, which you will find in **Appendix 2E**.

The following information is required to complete this table:

- the number of the Employment Equity Occupational Group where significant gaps were identified;
- the policies and practices identified for review;
- the barriers identified as resulting from each policy or practice (if there are no barriers, this should be indicated); and
- recommendations for the removal of each identified barrier (recommendations are not required, but are strongly encouraged).

The employment systems review results table is to be included in your organization's employment systems review summary report at the end of this step.

Detailed instructions on completing the report are provided in Tasks C through G.

Upon completion of Step 2: Employment Systems Review, you will have:

- ✓ *identified all human resources systems, policies and practices, both formal and informal, within your organization;*
- ✓ *assessed each of these systems, policies and practices to determine if it has a negative impact on members of a designated group for which gaps in representation were identified; and if so, assessed each one against a set of factors to identify barriers;*
- ✓ *determined if any of these barriers are valid requirements and, if they are, what accommodation may be possible to mitigate any negative impact;*
- ✓ *considered and potentially made recommendations for the removal of barriers, complete with time frames for their removal, and assigned a manager to be responsible for this;*
- ✓ *designed a process for reviewing new policies and practices in the future; and*
- ✓ *written a summary report of your employment systems review that will guide the creation of your employment equity plan.*

Employment Systems Review: A–G Task Outline

TASK A: Establish employment systems review methodology

Decide who will play a role in your organization's employment systems review. There are a number of choices available to your organization; however, it must be stressed that for most organizations, the task cannot be completed by one individual.

Create a communication strategy to inform employees, management, bargaining agents and employee representatives of the employment systems review and to seek their co-operation and input.

TASK B: Review the results of your workforce analysis, flow data analysis and clustering analysis

Review the results of your workforce analysis and give particular attention to significant gaps in the representation of designated groups, to provide the focus for your employment systems review. You will also review the results of your flow data analysis and clustering analysis, if one was conducted, at this time.

TASK C: Identify all relevant systems, policies and practices

Identify all formal and informal policies and practices for human resources functions in general and for those functions that are specific to each occupational group where under-representation exists. This means you first need to determine and document how these functions are actually carried out. You will also identify attitudes and elements of corporate culture that may have an impact on the designated groups.

All formal and informal policies, practices, attitudes and corporate culture elements identified are to be recorded in your employment systems review results table and in your summary report.

TASK D: Review policies, practices, attitudes and corporate culture to identify adverse impact

Assess whether or not each relevant formal or informal system, policy or practice has an adverse impact on the designated groups. If the policy or practice results in an adverse impact, it must be assessed against the following factors to identify barriers:

- legality;
- consistency;
- validity;
- accommodative nature.

At the end of this task, record identified barriers in your employment systems review results table and describe why you have determined that the policy or practice in question constitutes a barrier.

TASK E: Develop recommendations to respond to barriers

Your organization is encouraged to develop and record recommendations for the removal of each barrier. Attach time lines and the name of a manager responsible to each recommendation. Record this information in your employment systems review results table.

TASK F: Design a process for reviewing new policies and practices

Design a process for reviewing new or future policies and practices to ensure that they will not have an adverse impact on the designated groups.

TASK G: Prepare an employment systems review summary report and communicate results

Prepare an employment systems review summary report. This report will be similar to your workforce analysis summary report and will include an introduction, a description of your methodology, your results, and any recommendations that were made and conclusions. Communicate the results of your employment systems review to all employees, managers, employee representatives and bargaining agents.

Task A: Establish Employment Systems Review Methodology

A number of options for organizing your employment systems review are available, depending on the size and scope of your organization. It is vital to note that this process cannot be completed by one person alone. It is important to have a number of individuals involved so that the views, opinions and insights of those directly affected by informal and formal policies and practices, attitudes and corporate culture are acknowledged and incorporated throughout the process. However, one person should be held accountable for ensuring that your employment systems review is completed according to the requirements and timelines.

Upon completion of Task A, you will have:

- ✓ *established who will lead and conduct the employment systems review;*
- ✓ *created a communication strategy that includes your organization's first communication regarding the initiation and objective of the employment systems review; and*
- ✓ *distributed your first communication regarding the launch of your employment systems review to all employees, managers, bargaining agents and employee representatives.*

Select an Official to Lead Your Employment Systems Review

The employment systems review must be led by a human resources official with extensive knowledge of your employment systems. This official could be supported by:

- an employment equity committee or subcommittee;
- an employment systems review task force;
- a private consultant; or
- another configuration of your choice.

However your organization chooses to proceed in conducting its employment systems review, it is extremely important to ensure that employees, managers, bargaining agents and employee representatives always have ample opportunity to be involved in the process. People who work in different areas within your workforce may be able to alert you to differences in the way informal and formal policies, practices and attitudes have an adverse impact on the four designated groups.

If you decide to hire an outside consultant, be sure that this individual or firm is knowledgeable about the requirements that will be assessed during a compliance review.

Establish a Communication Strategy

Communicating with employees, management, bargaining agents and employee representatives contributes to their understanding and their participation in the employment systems review process. Keeping people informed of the status and results of the review can lessen concerns and reduce misconceptions related to employment equity. Good communication will also benefit your organization by improving the overall functioning of your human resources in the long term.

Again, the way your organization proceeds in establishing communication depends on its size and nature. For example, you may wish to distribute your communication using internal mail, letters, posters, e-mail or your intranet site.

Whatever format you choose, your communication must:

- explain what an employment systems review is;
- explain how it will benefit the organization and its employees;
- describe employment systems review methodology;
- name the individuals involved in the process and describe how others may participate;
- describe how information is collected and how it will be used;
- give assurance of confidentiality for all information collected;
- express the commitment of senior managers and union(s);
- specify when the results of the employment systems review may be expected and how they will be used in the employment equity plan; and
- give assurance that existing and new policies and practices will be continuously monitored and evaluated.

Distribute Your First Employment Systems Review Communication

Your first employment systems review communication will lay the groundwork for the employment systems review process. This communication must be distributed to all employees, managers, bargaining agents and employee representatives. Be sure to include the information listed in the previous section in a format that is appropriate for your organization, and ensure that each individual receives a copy.

You will find an example of an effective communication in **Appendix 2D**.

Task B: Review the Results of Your Workforce Analysis, Flow Data Analysis and Clustering Analysis

To focus your employment systems review, start by revisiting the results of your workforce analysis, flow data analysis and clustering analysis if they were conducted.

Upon completion of Task B, you will have:

- ✓ reviewed the results of your workforce analysis to focus your employment systems review;
- ✓ analyzed the results of your flow data analysis if one was conducted; and
- ✓ analyzed the results of your clustering analysis if one was conducted.

Reviewing Workforce Analysis Data

Look at the results table in your workforce analysis summary report to review identified gaps in representation.

Your employment systems review must focus on significant gaps – that is, on those that were previously identified using the three filter test. (For a review of the three filter test, consult Task A in Step 2: Workforce Analysis.)

You must also consult the results of your organization’s flow data analysis and clustering analysis if they were conducted. The data retrieved from these analyses will be used in the employment systems review process.

Using a Flow Data Analysis

Flow data analysis investigates shares of recruitment, promotion and termination received by designated group members in your workforce.

Flow data will help your organization focus its employment equity efforts on areas that appear to present barriers. For example, if recruitment or selection is not a problem but termination rates are high, it is important to focus on the reasons why designated group members are leaving at higher rates than employees who are not members of a designated group.

When analyzing your flow data if one was conducted, you must pay attention to instances of low hiring shares, low promotion shares or high termination rates among designated groups. If you find that your data reveals these types of problems, you must examine how your organization’s formal and informal policies and practices, attitudes and corporate culture may be causing employment barriers.

If you find that designated groups have **low hiring shares**, examine your organization's formal and informal policies and practices related to:

- recruitment;
- selection;
- attitudes and corporate culture; and
- accommodation.

If you find that designated groups have **low promotion shares**, examine your organization's formal and informal policies and practices related to:

- development assignments;
- training;
- promotion procedures;
- attitudes and corporate culture;
- accommodation; and
- performance evaluation.

And finally, if you find that designated groups have **high termination rates**, examine your organization's formal and informal policies and practices related to:

- attitudes and corporate culture;
- evaluations; and
- accommodation.

Using a Clustering Analysis

If 20 or more members of a designated group are found in a particular Employment Equity Occupational Group, your organization is required to conduct a clustering analysis; use the results of this analysis to direct your employment systems review.

As discussed in the workforce analysis, a clustering analysis provides detailed information about employee salary levels. Discrepancies in salary level (e.g., if members of a designated group are clustered in the lower quarters) may help alert you to promotion problems and pay equity issues. The results of this analysis may also reveal attitude problems toward certain designated groups in specific occupational groups or explain high termination rates for the affected designated groups.

***Note:** that clustering of a designated group may not necessarily be the result of barriers. If your organization has recently undertaken efforts to recruit or promote a large number of designated group members, this may make it appear that an employment equity problem exists.*

For example, if a trucking company recently recruited ten women to work as dispatch operators, the company's clustering analysis may reveal that female dispatchers are underpaid compared to male dispatchers. This clustering analysis fails to present the larger picture: that the organization has hired women for the first time in its 10 years of operation. In this case, the organization would make note of this explanation and continue to monitor this group in the future to ensure that they receive appropriate promotions and pay.

Task C: Identify All Relevant Systems, Policies and Practices

In this task, your organization will identify all systems, policies and practices, both formal and informal, that may relate to the gaps in representation uncovered in your workforce analysis. Creating a list of systems, policies and practices lays the foundation for further review in subsequent tasks. Be sure to record each policy and practice and its related Employment Equity Occupational Group (EEOG) number in the employment systems review results table.

Upon completion of Task C, you will have:

- ✓ identified all systems, policies and practices that may relate to gaps in representation; and
- ✓ recorded all relevant systems, policies and practices in your summary results table.

Formal policies and practices – human resource policies and practices that have usually been put in writing and approved by senior management.

Informal policies and practices – human resource policies and practices that are usually unwritten but generally understood throughout the organization.

Actual practices – how human resource practices are actually carried out (informal). For example, there may be well-understood written or even informal, unwritten procedures for succession planning, but further analysis may reveal that informal mentoring is the most significant practice in determining who is promoted.

***NOTE:** This specific task is not about identifying barriers; it is about identifying all policies and practices that have an impact on the gap being assessed (e.g., recruitment, hiring, promotion, termination and other systems related to the occupational group and location with a significant gap). Determining whether or not a policy or practice has a negative impact on one or more designated groups is the next task in the employment systems review process.*

Identifying Formal Policies and Practices

Compile a list of formal, written human resources policies as they relate to recruitment, training and development, promotion, retention, termination, corporate culture, and accommodation. This should be supplemented with any informal policies that are well understood and accepted.

The following formal policies and practices checklist can assist your organization in identifying policies and practices to be reviewed.

***Note on checklists:** Checklists can be useful tools for ensuring that all elements are considered, but they are seldom complete. You must clearly identify how policies and practices are **actually** carried out.*

Policies and Practices Checklist

General Human Resources Policies

- human resource manuals
- contract forms
- Web site material
- advertising
- promotional materials
- public relations material
- internal communication tools
- collective agreements
- union grievances procedures
- human rights complaints procedures
- other relevant documents

Recruitment

- initial screening
- application forms
- job advertisements
- agency referrals
- outreach with agencies
- targeted recruitment efforts
- word-of-mouth referrals
- job fairs
- walk-in recruiting
- post-secondary recruitment
- Internet posting
- internal posting
- interview techniques
- networking

Selection

- work experience requirements
- job requirements
- testing
- written job descriptions/ statements of required qualifications
- co-op placements
- staffing policies
- orientation packages (provided to interested job seekers)
- procedures for hiring temporary workers
- seniority rights
- managerial accountability
- mergers and acquisition

Training and Development

- treatment of acting positions
- career development programs
- job rotation
- lateral transfers
- mentorship programs
- tuition reimbursement
- assignments
- available training materials and programs
- on-the-job training

Promotion

- career bridging
- dissemination of promotion opportunity information
- formal and informal promotion policies
- seniority and union restrictions to promotions
- succession planning
- internal recruitment

Retention and Termination

- benefits
- bonuses
- consultations with employee representatives
- disciplinary measures and appeal processes
- dress code
- employee assistance program
- exit interview documents
- family-related leave
- work-life balance
- harassment policies and procedures
- health and safety
- retention of temporary workers
- “last hired, first fired” practices
- paid leave
- performance evaluation
- termination
- unpaid leave/sabbaticals
- violence prevention
- wellness
- work sharing
- attitudes and corporate culture
- employee surveys

Accommodation

- accessibility
- accommodation policies and procedures
- bereavement leave
- court day leave
- daycare services
- employment equity policy
- modified facilities
- modified job functions
- modified worksite
- modified workstation
- maternity and parental leave
- religious observance
- technical aids
- telework

Identifying Informal Policies and Practices

It is crucial to identify the informal policies and practices within your organization that may create barriers leading to gaps in representation. It is often the informal practices rather than the formal policies that have the greatest impact on employment opportunities for designated group members. Most employers find that at least some practices differ significantly from their organization's formal or written policies.

Individuals outside of your committee or working group must be consulted; they are invaluable to identifying relevant systems and practices that are affecting a particular EEOG or geographic location. You may choose to conduct interviews with staff, review records of past human resource actions, engage in expert brainstorming or use a combination of these options.

- ✓ **Interview or survey staff, including managers**
Soliciting the input, concerns and ideas of staff and managers can be the most effective means of determining actual practices. Both staff and managers are directly affected by your organization's policies and practices and see barriers first-hand. These individuals are able to relay information on how things are **actually** done and how policies and practices are carried out in day-to-day business. Simple questions such as, "How did you get your position?" will provide a clear indication of the most common practices.
- ✓ **Review records of past human resource actions (i.e., hiring and terminations)**
Review your organization's human resource records relating to hiring and terminations. Such a review may indicate, for example, that most staff in the sales area were hired through employment agencies; that few formal interviews were conducted when hiring semi-skilled workers; or that most professionals hired came through referrals by existing staff (networking) rather than through a formal post-secondary recruitment policy.
- ✓ **Gather experts for a brainstorming session**
Your organization may wish to use the opinions and advice of experts in areas such as human resources or employment equity to focus its identification of informal policies and practices. It is often useful, after formal policies have been identified, to bring together a representative group of internal experts. This includes more than human resource professionals or specialists: it may also include experienced middle and/or senior managers, union representatives, and selected representatives from the designated groups. This brainstorming group reviews each area with significant gaps and answers questions such as: "How do we recruit? promote, etc.?"


Recording Policies and Practices

The formal and informal policies and practices that your organization intends to review in order to identify barriers must be listed in your employment systems review results table along with their related EEOG. This table is found in **Appendix 2E**.

In the table:

- list the number of the EEOG where gaps were identified in the first column; and
- describe the policy or practice in detail in the second column (as indicated by the arrow in the following sample table).

Employment Systems Review Results Table



EEOG #(s)	Policy/Practice (formal/informal)	Barrier Identified	Recommendation
Recruitment, Selection and Hiring			
Training and Development			

Note: There may be different practices operating for different specific occupational groups within an EEOG (e.g., professionals – engineers may use networking; accountants may use post-secondary recruitment). These practices need to be reported and assessed.

Task D: Review Policies, Practices, Attitudes and Corporate Culture to Identify Adverse Impact

In this task, your organization will analyze the identified systems, policies and practices to determine their impact on all applicants and employees, both those who are and those who are not members of a designated group. The purpose of this exercise is to determine if these policies, practices and attitudes create barriers to the employment of designated group members. A barrier exists when a policy or practice has a more adverse impact on those who are members of one or more of the designated groups than on those who are not.

As you review your organization's formal and informal policies and practices, you must pay close attention to how these policies and practices may lead to employment barriers, discrimination and negative attitudes. If you are able to identify these issues as the cause of designated group underrepresentation in an Employment Equity Occupational Group (EEOG), it is your organization's responsibility to make the necessary changes to reverse any negative impact.

At the end of this task, identified barriers must be recorded in your employment systems review results table. If a policy or practice has not created a barrier, you must record this (i.e., "no barrier found").

Upon completion of Task D, you will have:

- ✓ analyzed identified systems, policies and practices to determine their impact on all employees and applicants, both those who are and those who are not members of a designated group; and
- ✓ recorded analysis results and identified barriers.

For clarity, Task D is broken down into four sections:

- 1) **Barriers, Discrimination and Attitudes: An Overview** – A review of the implications of barriers, discrimination, attitudes and corporate culture.
- 2) **Gathering Further Information** – Advice on soliciting helpful information from various individuals.
- 3) **Reviewing Formal and Informal Policies and Practices for Barriers** – A five-part process to determine the adverse impact, legality, consistency, validity and accommodative nature of each identified policy and practice.
- 4) **Recording Barriers** – Instructions for recording barriers in the employment systems review results table.

Barriers

*Barriers, for the purpose of employment equity, are defined as formal or informal policies or practices (written or unwritten) that **disproportionately** restrict or exclude designated group members based on factors unrelated to the nature of work, merit, or safety (e.g., job requirements that are not bona fide occupational requirements).*

Types of Discriminatory Barriers

Intentional Discrimination – actions or requirements that are intended to exclude designated group members. These can be covert or overt.

Systemic Discrimination – actions or requirements that are built into the employment systems and that, while **not intended** to exclude, have an adverse impact on designated groups without being a bona fide occupational requirement. Examples include:

- artificially high screening criteria that reduce the number of applications to be considered;
- requests for educational standards that are higher than needed;
- training or work experience requirements based on traditional or historical preferences, rather than actual job requirements; or
- disregard for physical barriers that limit access to or mobility within an organization's premises.

1) Barriers, Discrimination and Attitudes: An Overview

Barriers

Employment barriers arise both intentionally and unintentionally from policies, practices, attitudes and corporate culture that are neither job-related nor required for the safe and efficient operation of an organization. A policy or practice is a barrier when it has a greater negative impact on designated group members than on those who are not members of a designated group. These barriers contribute to hiring and promotion rates that are lower than expected for designated group members in comparison to those who are not members of a designated group. They also manifest themselves in the under-utilization of designated group members and in the concentration of designated group members at the lower levels of an organization and in non-decision making positions. Barriers can be subtle and hard to detect. They frequently result from a lack of awareness of their impact on designated group members.

The following short list of barriers that may exist in a workplace is not exhaustive; it is meant to provide your organization with a foundation on the basis of which to begin the process of identifying barriers in your workplace.

Examples of barriers include:

- prejudice or ill-will reflected in deliberately discriminatory actions against individuals who are members of designated groups;
- unequal treatment (e.g., asking different questions of women and men applying for the same job);

-
- systemic barriers that discourage or block members of designated groups from employment opportunities (e.g., arbitrary height and weight requirements; unnecessary experience requirements);
 - maintenance of a working environment that is hostile or abusive toward members of designated groups or that is simply a non-supportive work culture and environment for designated group members;
 - inadequate facilities that present physical barriers to persons with disabilities;
 - use of recruitment sources that do not provide an appropriate pool of candidates (e.g., advertising, word of mouth, networking, employment agencies);
 - lack of objective, structured staffing, particularly when coupled with attitude problems;
 - unequal access for designated group members to non-advertised promotion, training and development systems, networks, and assignments; and
 - lack of reasonable accommodation.

You will find a more extensive list of frequently found barriers in **Appendix 2F**.

Again, it is important to remember that, for a good employment systems review, it is better to begin with the question, “How do we do X?” rather than “Do we do X?”

Discrimination

A review of your organization’s formal and informal policies and practices may reveal discrimination-related issues acting as barriers to employment for designated group members. Discrimination can be either intentional or systemic; both types must be eliminated to ensure an equitable workplace.

Attitudes and Corporate Culture

In addition to reviewing your organization’s formal written policies and practices, you are required to conduct an in-depth review of attitudes and corporate culture to identify potential barriers. Negative attitudes can form a part of your organization’s corporate culture and lead to a negative work environment or to stereotypes, which may have an impact on the recruitment, promotion and retention of designated group members.

The best way for your organization to assess attitudes and corporate culture is to solicit the input of employees, bargaining agents and employee representatives to gain a better understanding of how they are affecting designated groups.

Attitudes

In this context, attitudes refer to the beliefs individuals hold that influence both their behaviour and their perceptions of designated group members. Attitudes can, of course, be both positive and negative, and it is the latter that is most likely to create barriers.

Attitudes can be quite overt and hostile:

“There is no place for women in our industry.”

Attitudes can take the shape of inaccurate stereotypes:

“Professionals who are members of a visible minority are not interested in management positions.”

Attitudes can appear to be supportive but actually be problematic:

“I am completely dedicated to improving the representation of persons with disabilities even if it does slow us down.”

Negative attitudes usually lead to a hostile work environment for designated group members or to stereotypes that may have an impact on their recruitment and promotion. Barriers will continue to exist despite excellent written policies if individuals (managers or employees) do not apply them.

- **Negative attitudes may have a direct impact on selection and hiring.** Such attitudes may include: “this is not a woman’s job; Aboriginal people are unreliable; members of visible minorities make poor managers; persons with disabilities cannot perform in a fast-paced operation.”
- **Wrong attitudes or “information” may also influence recruitment efforts.** Such attitudes may include: “visible minorities are less educated; I know women are not interested in this job because they do not apply; Aboriginal people prefer seasonal employment.”

Corporate Culture

Attitudes are certainly part of an organization’s corporate culture, particularly if they are widespread. For our purposes, however, corporate culture refers to the shared “culture” of how things should be done in your organization, what its core values are and what is “valued” in its employees.

In increasingly diverse workplaces, once well-understood and accepted cultures may no longer be appropriate and may even have a negative impact on the organization’s human resource management and economic performance.

Examples of outdated corporate culture include:

- accepting long hours, unplanned overtime and quick-response travel as signs of commitment to the company;
- expecting involvement in activities such as after-hours sports or social outings;

-
- valuing aggressive internal competition over more co-operative management and collaboration; and
 - tolerating a highly “macho” work environment.

It can be difficult to isolate the key aspects of an organization’s corporate culture that may present barriers, as they may be deeply ingrained and supported by a belief that they are “the reality” of the industry or business. Designated group members can often help identify the elements that may be causing problems.

As you review your organization’s formal and informal policies and practices, you will need to ask yourself continually, “How do we do this?” It is possible that your organization’s formal policies differ greatly from actual practices; although your policies may not appear to have a negative impact on designated groups, your informal practices may be quite detrimental.

Gathering Insight to Assess Attitudes and Corporate Culture

When conducting interviews, focus groups or brainstorming sessions to identify and gain insight into attitudes and corporate culture in your workplace or to assess the existence and impact of these, you may wish to ask the following questions:

- Have you ever experienced or witnessed harassment or discrimination in the workplace? If so, please provide examples.
- Do you believe that acting opportunities, assignments, mentoring, promotions, training and so on are freely communicated and offered? If not, does this have an impact on designated group members?
- Do you have any ideas or suggestions regarding what our organization could do to increase its representation or to make the workplace environment more positive for designated group members?
- What do you believe are the key components of our organization’s working culture?
- What does our organization value most in its employees?
- Outside of specific work duties, what does our organization value in a good employee?

Simply asking, “Why do you think (designated group) are under-represented in our organization?” will often provide invaluable information. The response may indicate common attitudes toward the group, e.g., “They are not interested in being managers or they do not have the experience.”

The responses you receive from individuals you interview should be followed up and incorporated into the recommendations for the removal of barriers that you will make in Task E.

As mentioned, consulting with those directly affected by your organization’s policies and practices is crucial for a successful employment systems review.

2) Gathering Further Information

As emphasized previously, when conducting a review of your organization's policies and practices, it is important to focus not only on formal policies and practices but also on how these policies and practices are actually carried out and what their impact is on employees. It is everyday practices rather than formal policies that are likely to have the greatest impact on employment opportunities available to designated group members. Conducting interviews, focus groups and employee surveys will provide evidence of your organization's culture, attitudes, values, group norms and informal practices.

Additional information can be gathered from:

- designated group members;
- employees who are not members of a designated group;
- management or supervisory staff;
- employee representatives; and
- human resources staff.

Consulting with these individuals is essential to the thoroughness of your employment systems review.

Interviews, focus groups and surveys will help to identify:

- whether formal employment policies are adhered to;
- what informal employment practices exist; and
- how employees are affected by formal and informal systems.

In addition, they can identify:

- instances of discrimination perceived by employees;
- the impact of attitudes and corporate culture;
- priorities for the elimination of barriers; and
- possible actions to eliminate barriers.

Your organization must determine the type of questions that would be most helpful in conducting this part of the employment systems review. Essentially, you are looking to shed light on how policies and practices are actually implemented in everyday work situations and what impact they have on designated group members. The following list of potential questions can help guide you in this process.

Potential questions to ask employees:

- How were you recruited into this organization? What was the selection process when you were hired/promoted?
- What informal practices that operate in your area affect recruitment, promotion, training and assignments, if any?

-
- Why do you think there is an under-representation of designated group members?
 - Do you believe discrimination is present and, if so, can you give some examples?
 - Can you identify any areas that you are aware of where things are done in ways that do not follow written policies?

A note on focus groups: Focus groups often provide a cross-section of views about how the organization operates, what its corporate culture is, etc. It is important to respond to what is said by seeking to validate both positive and negative input. If the report from the focus group states that some participants felt a certain way, it is necessary to determine whether or not such a position is supported by other evidence gathered.

3) Reviewing Formal and Informal Policies and Practices for Barriers

As you review your organization's formal and informal policies and practices, it is crucial to continue asking yourself and others, "How are things **actually** done?" As stressed numerous times throughout this process, when written policies cannot reasonably explain under-representation for a given group, it is likely that an explanation will be found when looking at the informal policies and practices that exist off record.

*Ask yourself:
"How are things actually done?"*

A note on tracking systems

Your organization may choose to put in place tracking systems to capture statistics from various steps of its human resources systems. For example, your organization could choose to track the percentage of applications received from designated group employees versus the percentage that are screened in. Moreover, your organization could also do comparative analysis on different aspects of its processes. For example, if your organization administers a standard test, it could measure whether or not the success rate for women is comparable to men.

These types of statistical analysis are encouraged as they enable organizations to pinpoint which portion of the system poses a barrier for designated group members. Being aware of the adverse impact, the organization will be better equipped to uncover the barrier using the four diagnostic factors listed below.

Once you have identified all relevant systems, policies and practices, assess whether or not each one has an **adverse impact** on the designated group. If so, then each one must also be assessed against the following factors to identify barriers:

- legality
- consistency
- validity
- accommodative nature

The Employment Systems Review Policies and Practices Diagnostic Tool (**Appendix 2G**) will assist your organization in analyzing policies and practices.

Adverse Impact

Does this policy or practice have an adverse impact on designated group members?

The first step is to assess whether or not the policy or practice in question has a disproportionately negative impact on designated group members. Consider the examples below.

Recruitment

1. Use of employment agencies to recruit semi-skilled or clerical workers: Do the agencies used refer qualified candidates from the under-represented designated group at the same percentage as the group's availability?
2. Networking to recruit professionals or middle managers: Is the profile of candidates that result from networking similar to the profile indicated by availability data?

Selection

1. Strength Tests: Does a requirement to meet a strength test at a specific level result in a higher percentage of designated group applicants failing to meet the standard?
2. Use of years of experience as a selection standard: Are one or more of the designated groups less likely to have the years of experience?

If you find that the particular policy or practice you are assessing does not have an adverse impact in the given situation, then no barrier exists. Enter “no adverse impact” in your employment systems review results table, explain how or why this was the conclusion and proceed to analyze the next policy or practice.

If you do find that there is evidence of a disproportionately adverse impact on those who are members of a designated group compared to those who are not, proceed to assess its legality.

Legality

Does this policy or practice conform to existing human rights and employment standards legislation?

Check to see if the policy or practice clearly contradicts existing human rights and employment standards legislation in your province or territory.

A non-conforming policy or practice may include an overt exclusion of designated group members for certain jobs. You should also apply the legality factor to requirements that may be deliberate, covert attempts to exclude certain groups, as in the following examples of selection criteria:

- “active, energetic candidates attractive to our discerning clients”
- “Canadian experience”

Using different selection standards – e.g., different questions based on gender, race or disability status – is also clearly illegal.

If questions remain, contact your province or territory’s Human Rights Commission or your local Labour Affairs Office.

If you find that the particular policy or practice you are reviewing clearly does not conform to human rights or employment standards, then it must be removed, changed or validated as a bona fide occupational requirement.

For example, restricting gender may be a bona fide occupational requirement if it relates to a job involving modesty issues, such as an attendant for a change room. If it is changed, it must be reassessed starting with the first factor: adverse impact. If it is a bona fide occupational requirement, proceed to assess its consistency.

If you find that the policy or practice is not illegal, as far as you can tell, proceed to assess its consistency.

Consistency

Is this policy or practice applied consistently?

Ensure that the policy or practice in question is applied in an equitable and consistent manner.

Lack of consistency can take several forms, for example:

- 1) the use of a test or any standard with an adverse impact for some competitions but not for others; or
- 2) the use of a physical test with an adverse impact to screen out candidates where no efforts are made to ensure that employees, once hired, continue to meet this standard. This is particularly important where there is evidence that many existing employees doing the job could not meet the standard.

If you find that the particular policy or practice you are reviewing is not applied consistently, then it must be changed or removed. If it is changed, it must be reassessed starting with the first factor: adverse impact.

If you find that the policy or practice is applied consistently, proceed to assess its validity.

Validity

Is this policy or practice valid, that is, necessary for the safe and efficient operation of your organization?

The policy or practice in question must accomplish its proposed predictive or evaluative function in order to be a business necessity and a bona fide occupational requirement. In addition, the policy or practice is considered valid only if there is no reasonable alternative that has no or a less adverse impact.

Validity questions often revolve around the issue of tests used to select candidates: Do people who score high actually perform better on the job than those who do not? Other examples include whether or not experience requirements indicate performance and whether or not job tasks and their attendant requirements actually reflect the work being done.

The practice must also be objective. Older tests, for example, may still contain a gender or cultural bias. Ensure that tests are administered in such a way as to provide a positive atmosphere for the test takers and to eliminate any bias that could affect their performance.

If you find that the particular policy or practice you are reviewing is not valid, it must be changed or removed. If it is changed, it must be reassessed starting with the first factor: adverse impact.

If you find that the policy or practice is valid, proceed to assess its accommodative nature.

Accommodative Nature

Where a policy or practice is determined to be a valid (bona fide) job requirement but excludes one or more designated groups in a disproportionate way, your organization must determine whether or not it is possible to use accommodation to remove or decrease the negative impact.

Accommodation refers to individual adjustments made in the workplace that respond to the needs of a specific employee or job applicant. Needs that must be accommodated result from such factors as disability, family status, ethnic or national origin, and religious beliefs.

Question: Is accommodation possible? If the policy or practice is a valid job requirement but tends to exclude designated group members, can an accommodation be made to reduce or eliminate the adverse impact?

Example:

Skilled Workers – Workers must sometimes work in areas that are inaccessible for certain employees with disabilities, but given the number of workers in this group, work assignments

can be arranged to accommodate persons with disabilities without imposing undue hardship on the organization.


Accommodation must be considered for all valid (bone fide) job requirements (and related policies, practices, etc.) that have a disproportionately adverse impact on one or more of the designated groups, unless the accommodation would result in undue hardship.

Note: The Supreme Court has ruled that accommodation is required in response to a valid requirement; if a requirement with an adverse impact is not valid, there is an obligation to remove the policy or practice.

4) Recording Barriers

You must now record your findings. In the third column of your organization's employment systems review results table (as indicated by the arrow in the following sample table), enter the barrier your organization has identified in relation to the formal or informal policy or practice in question. Be sure to explain exactly how the policy or practice constitutes a barrier.

If no barrier exists, indicate why and explain (for example, there is no adverse impact or it is a bona fide occupational requirement). If further long-term assessment work is required to determine the impact of the policy or practice, indicate this.



EEOG #s)	Policy/Practice (formal/informal)	Barrier Identified	Recommendation
Recruitment, Selection and Hiring			
Training and Development			

Note: A policy or practice may be a barrier for one or more of the designated groups but not for all; when identifying a barrier, it must be clear to which group(s) and in which EEOG it applies.

Task E: Develop Recommendations to Respond to Barriers

To begin the process of removing barriers, your organization is strongly encouraged to develop a series of recommendations addressing each individual issue. You will seek to change or remove those policies and practices that have an adverse impact on one or more of the designated groups and are illegal, not valid, inconsistently applied or non-accommodative. The changes you propose should be those that are most appropriate and attainable for your organization.

Upon completion of Task E, you will have:

- ✓ *considered, and potentially made, recommendations for the removal of identified barriers.*

The following examples and those in Appendix 2F were developed to help guide your organization through this process. These lists are not exhaustive and do not account for your organization's unique circumstances.

Examples of Barriers and Recommendations

BARRIER

The screening criteria put in place to decrease the number of candidates (such as requirements for years of experience or education) consistently exclude qualified designated group members at a higher rate than similarly-qualified candidates who are not members of a designated group. These standards are not reliable measures of future job performance.

RECOMMENDATIONS

- ✓ *Eliminate excessive educational and experience requirements.*
- ✓ *Replace these requirements with valid competency standards and appropriate techniques for evaluating these standards.*

BARRIER

Information on promotion opportunities in middle management is not generally available or publicized within the organization. This has had a significant impact on visible minority professionals, who are less likely to be aware of these opportunities.

RECOMMENDATIONS

- ✓ *Develop a structured information package and a communication strategy to ensure that all employees understand the promotion process and have equal access to opportunities.*
- ✓ *Initiate training to help managers mentor all professional employees in an equitable way.*

Sometimes two practices combine to create barriers, as in the following example:

BARRIER
There is no structured process for conducting interviews and assessing credentials. Staffing managers tend to believe the job is too physically demanding for women. The lack of structure in the interview means women are disproportionately screened out because managers believe they will not be able to do the work.


RECOMMENDATIONS

- ✓ *Establish a clear, structured process for staffing and require record keeping.*
- ✓ *Determine valid requirements and establish a mandatory process for assessing this standard.*
- ✓ *Train staffing managers on conducting valid candidate assessments and on avoiding decision making based on stereotypes.*
- ✓ *If possible, have a woman participate on the staffing committee.*

An extensive list of examples of commonly found barriers, along with recommendations, can be found in **Appendix 2F**.

Recording Recommendations

If your organization decides to make recommendations for the removal of barriers, you are encouraged to record them in the fourth column of your employment systems review table (as indicated by the arrow in the following sample table). Note that the recommended action must be sufficient to remove the barrier and contribute to making reasonable progress toward closing the identified gap.



EEOG # <i>(s)</i>	Policy/Practice (formal/informal)	Barrier Identified	Recommendation
Recruitment, Selection and Hiring			
Training and Development			

Note: The employment systems review is a report on findings with recommendations for changes. The final, approved employment equity plan may not contain all of these recommendations.

Task F: Design a Process for Reviewing New Policies and Practices

Under Section 9(2) of the *Employment Equity Regulations*, your organization must review all new policies and practices implemented after the employment systems review is completed to ensure they will not constitute a barrier for one or more designated groups.

Upon completion of Task F, you will have:

- ✓ *designed a process for reviewing any new policies and practices that are developed to ensure they do not create a barrier for designated group members.*

You must design your own process for ensuring that your organization meets this requirement. The human resources staff or the employment equity committee are best suited to perform these assessments.

To ensure that new policies and practices do not constitute barriers to one or more designated groups, either:

- **Have your human resources staff assess new policies and practices prior to their implementation.** For example, your human resources staff might conduct a pretest with a focus group of designated group members each time your organization wishes to create a new policy or practice. Doing this will assist you in gauging the impact of a policy or practice on the designated groups before it is implemented.
- **Have your organization's employment equity committee and/or employment equity staffing specialist conduct a review** similar to the one conducted using this guide, prior to the implementation of new policies or practices.

Once a new policy or practice has been initiated, monitor its impact for potential barriers closely.

Task G: Prepare an Employment Systems Review Summary Report and Communicate Results

Just as your organization prepared a summary report of your workforce analysis, you must also prepare a summary report of your employment systems review. Drafting a report will help you prepare for the next step in the process, the development of your employment equity plan, and will complement your organization's efforts to document its progress. The format you choose for this report is up to your organization, as long as it follows the basic outline presented.

Upon completion of Task G, you will have:

- ✓ prepared a summary report of your employment systems review; and
- ✓ communicated the results of your employment systems review to all employees, managers, unions and employee representatives.

Employment Systems Review Summary Report

A summary report must include:

- an introduction;
- a description of the methodology used to conduct the employment systems review;
- the results of your review (i.e., the employment systems review results table);
- a description of your organization's process for reviewing new policies and practices; and
- a conclusion.

Details on the content of each component of the employment systems review summary report follow.

Introduction

The introduction of your report is an overview of your larger employment systems review. It should include:

- the identified gaps in representation that became the focus of your employment systems review;
- a list of previous employment systems reviews completed by your organization and how they are reflected in this report;
- any challenges that your organization encountered while completing your employment systems review; and
- the status of recommended measures (if they were made) for removing barriers in your organization's policies and practices.

Methodology

The methodology section of the summary report outlines the resources and processes that your organization used to conduct its employment systems review. This is meant to be an overview and must include:

- information on the individuals who managed and conducted the employment systems review;
- a list of those who participated in employment systems review consultations;
- the steps taken to identify and assess the systems, as well as the methods used to collect the required information; and
- a list of all employment systems, policies and practices that were reviewed.

Results

You may simply attach the employment systems review results table that you completed in Tasks C, D and E.

Note: This component of the summary report is considered complete when you are confident that if the barriers are removed, your organization will be able to recruit, hire, promote and retain designated group members at levels consistent with their availability in the relevant labour market.

Process for Reviewing New Policies and Practices

Describe in detail the process that your organization developed in Task F for reviewing all new policies and practices to ensure that, when implemented, they will not constitute a barrier for the designated groups.

Conclusion

The final step in completing your employment systems review summary report is to write a conclusion summarizing your overall findings and the steps your organization intends to take to develop an action plan for removing identified barriers and ensuring that new policies and practices do not reintroduce barriers.

Communication

Finally, in keeping with the communication requirements, you must communicate the results of your employment systems review to employees, management, bargaining agents and employee representatives.

To view a sample memorandum that may be used for this purpose, see **Appendix 2H**.

Moving Forward...

Now that you have identified barriers, made recommendations (if applicable) for their removal and established a process for monitoring and reviewing future policies and practices, you are ready to create your employment equity plan.

The creation of your organization's employment equity plan is the highlight of the implementation phase of the employment equity process. Your organization will use the information gathered and the strategies developed in earlier stages of this process to create its employment equity plan. This includes the data and information retrieved through the workforce survey and analyzed in the workforce analysis, as well as the information gathered in your employment systems review.

You will find all the instructions and tools necessary to create an employment equity plan in Step 3.



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STEP 2 – Appendix Employment Systems Review

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Appendix 2D – Memorandum

First Employment Systems Review Communication

To: All Employees **Date:** [Date]

From: President/CEO

Subject: Announcing the Employment Systems Review

As part of the employment equity process, [Organization's name] will be conducting a review of our employment systems. An employment systems review is designed to identify human resources policies and practices that may negatively affect employees, particularly Aboriginal peoples, women, members of visible minorities and persons with disabilities.

After analyzing the results of our workforce survey, we have found that [Designated group(s)] [is/are] under-represented in [Occupational group(s)]. As a result, we will be examining all formal and informal policies and practices that impact [this/these] occupational group[s] in order to improve the representation of [Designated group(s)]. We will be assessing whether these policies and practices are essential to the job or could be altered to reduce any negative impact.

We will be forming an employment systems review working group to evaluate our employment systems. If you are interested in becoming a member of the working group, please contact [Name of employment equity coordinator] at [Phone number]. We especially encourage the participation of designated group members.

After conducting the review, we will develop and implement measures to ensure that everyone can participate fully and equitably in our workforce. Once the review has been completed, the results will be communicated to you.

An employment systems review will benefit all employees by ensuring that employment policies and practices are fair for everyone. Please do not hesitate to contact [Name of employment equity contact] at [Phone number] if you have any questions or comments about the review or employment equity in general.

Yours sincerely,

[Name of President/CEO]

Announcing ... The Employment Systems Review

As individuals and as an organization, our challenge is to create an environment that fosters dignity and respect for everyone. We want a workplace where each of us, regardless of gender, race or disability, can fulfil our potential and contribute to the success of the organization.

The results of our workforce survey show that there are gaps in the representation of [Designated group(s)] in certain occupations in our workforce. A “gap” is the difference between the current representation of designated group members in our workforce and their availability in the Canadian workforce. An employment systems review will help us determine the causes of these gaps and identify possible solutions.

The employment systems that will be examined are:

- recruitment, selection and hiring;
- training and development;
- promotion;
- retention and termination;
- reasonable accommodation; and
- attitudes and corporate culture.

Where necessary, the review will also make recommendations for removing employment barriers for all employees, including designated group members, while preserving the merit system for hiring, promotion and training opportunities.

We Need Your Co-operation

We will not be able to conduct a review of our employment systems without your assistance. We need people who work in different areas of our organization, people who hold different positions, people who are members of designated groups and people who are not to:

- sit on the employment systems review working group to look for barriers in both our written policies and practices and any informal, unwritten practices that affect our staffing;
- participate in focus groups to examine the impact of written and unwritten practices and to identify attitudes and corporate culture issues that may influence how we operate; and
- agree to be interviewed to share individual experiences.

All information collected through the employment systems review will be kept confidential. *[If you do use an outside consultant, add the next two sentences: “To guarantee confidentiality, we will use an external consultant to conduct the focus groups and interviews. Any information passed on to the organization will be in an anonymous form.”]*

Please help us make our employment systems review a success by volunteering to participate when you are invited to do so. Our goal is to have a workforce that attracts the best and enables them to give their best.

If you are interested in becoming a member of the working group to review formal and informal policies and practices, or if you have any questions about the employment systems review, please feel free to contact [Name of employment equity contact] at [Phone number].

[Name and title of senior official responsible for employment equity]

Appendix 2E – Employment Systems Review Results Table

EEOG #(s)	Policy/Practice (formal/informal)	Barrier Identified	Recommendation
Recruitment, Selection and Hiring			
Training and Development			
Promotion			
Retention and Termination			
Reasonable Accommodation			
Attitudes and Corporate Culture			

Please note: Recommendations for the removal of barriers are not required but are strongly encouraged. Developing recommendations will greatly assist your organization when it comes time to create its employment equity plan.

Appendix 2F – Frequently Found Barriers with Recommendations

Recruitment, Selection and Hiring		
Policy/Practice	Barrier	Recommendation
<p>Job postings are circulated to potential candidates based on decisions made by individual managers.</p>	<p>Not all employees are given an opportunity to apply to all positions. There are strong indications that this process favours men over women (other designated groups may also be excluded).</p>	<p>Post job vacancies on centrally located bulletin boards that are accessible to all employees. Monitor the profile of candidates and take additional recruitment steps if the number of women who apply continues to be insufficient.</p>
<p>Applicants are referred from outside sources, i.e., professional associations, training institutions, employment centres and agencies, and executive search firms.</p>	<p>Not all referral organizations have clearly defined employment equity policies. There is evidence from interviews with managers and a review of staffing files that the profile of candidates does not reflect the availability of visible minorities (or other groups).</p>	<p>Advise the agencies or consultants of your organization's employment equity goals and interest in interviewing qualified designated group applicants. Monitor results and take action if profiles continue to be inappropriate.</p>
<p>In some cases, applicants are recruited and screened by invitation only.</p>	<p>This practice is used as a part of an “old boys” network to generate applications. This network may not reflect the values of employment equity and may result in few or no invitations to designated group members.</p>	<p>Institute a comparable inventory to ensure that high-potential designated group members have equal access to sponsorship. Monitor designated group members’ rates of participation in the inventory and success rate in obtaining positions via this system.</p>
<p>Recruitment of applicants relies heavily on word-of-mouth referrals.</p> <p><i>Note: this remains a common practice in Canada for many jobs.</i></p>	<p>This recruitment practice frequently results in the recruitment of applicants that reflect the existing composition of the workplace, which can be a problem when there is existing under-representation of designated group members.</p>	<p>Take a proactive approach by explicitly encouraging employees to refer candidates from the under-represented designated groups (offering rewards is an option). Supplement this practice with other external recruitment</p>

Policy/Practice	Barrier	Recommendation
		methods to ensure that you obtain a profile of candidates that reflects availability.
Recruitment relies heavily on walk-in applicants.	<p>Recruits approaching your organization do not always reflect the diversity of your community and the external labour force. Not formally advertising positions in your community could result in few or no applicants from the designated groups. This is an issue if:</p> <ul style="list-style-type: none"> • women or other groups have not traditionally been considered for the jobs in your organization; or • there has been a history, or a perceived history, of exclusion in the organization. 	<p>Reduce reliance on the walk-in method.</p> <p>Use other external recruitment methods, such as contacting associations that provide employment-related or other services to the designated groups to get the message out that your organization is interested in receiving applications from qualified job applicants who are members of under-represented designated groups.</p> <p>Establish contact with employment offices in a variety of locations.</p>
Front-line personnel staff is not trained in employment equity principles and human rights legislation.	<p>Due to lack of training, front-line personnel staff may not be aware of the need to recruit designated group members. Where attitudes and stereotypes are identified as problematic for one or more designated groups, qualified candidates from these groups are frequently excluded.</p> <p>The requirement to offer accommodation at the point of hire may not be practiced.</p> <p>Language and practices may not respond appropriately to the diverse pool of applicants.</p>	<p>Ensure that front-line personnel staff is aware of employment equity principles and human rights legislation as well as the adverse impact of discourteous treatment.</p> <p>Include designated group members among front-line personnel staff, where possible.</p>

Policy/Practice	Barrier	Recommendation
Job advertisements are posted only in mainstream publications.	Publication of job ads may restrict access to designated group applicants.	Ensure that text and pictures portray designated groups in non-stereotypical ways. Include a box indicating that the organization is committed to having a workforce that represents the community and is particularly interested in receiving applicants from the designated group(s). Advertise in ethno-cultural as well as mainstream newspapers, wherever possible.
Application Forms		
Application forms are only available in standard print form and must be filled out by hand.	This may constitute a barrier for applicants with physical disabilities, for example because they are not able to read standard print, are visually impaired, or do not have use of their hands.	Ensure that application forms are made available in various formats. Provide assistance to applicants who are unable to fill out the application by hand.
Application forms require applicants to “account for” each year of “work life.”	This suggests that applicants must not have any gaps in employment. This may discourage members of certain designated groups from applying. It may constitute a barrier for persons with disabilities who have gaps in employment due to illness or injury. It may also constitute a barrier for women who were not continuously employed because of pregnancy and childcare responsibilities.	Suggest that applicants who do not have a consistent work history submit a skills-based resume rather than a chronological resume. Invite applicants to indicate skills used in unpaid work experience or in work-at-home or full-time-parenting duties. Ensure that staff who screen applications do not penalize applicants for career gaps due to parenting or homemaking tasks, or due to illness or injury.
Application forms require applicants to list Canadian work experience.	This may constitute a barrier for visible minority applicants who have work experience from countries other than Canada.	Consider whether or not Canadian work experience is actually necessary for performing the job.

Policy/Practice	Barrier	Recommendation
	It may also discourage visible minority applicants with limited Canadian work experience from applying.	Ensure that staff who screen applicants also consider training and foreign work experience.
Testing and Simulations		
Applicants are screened in based on their scores on standardized tests.	Standardized tests or job simulations appear to screen out a disproportionate number of applicants who are members of a designated group compared to applicants who are not (less common for women). The evidence suggests that these tests are frequently not strong predictors of performance and are used as easy screens to reduce numbers.	Eliminate tests that are not demonstrably reliable predictors of future job performance. Replace only with alternative assessment procedures that have been reviewed for adverse impact and validity.
Interviews are unstructured and undocumented. Interviewers and hiring managers are unaware or have vague knowledge of employment equity principles and human rights legislation.	An unstructured and undocumented interview process allows personal and non-job-related values and attitudes to influence hiring decisions. Interviewers and hiring managers frequently permit such subjective standards to influence hiring decisions, and these standards frequently discriminate against the designated groups	Provide up-to-date written policies and guidelines on interviewing and hiring procedures. Ensure that interviewers understand the importance of documenting and standardizing all interviews. Ensure that interviewers are well trained in applicable human rights legislation and bias-free selection. Provide relevant employment equity training and cross-cultural sensitization. Include designated group members on the interview team, where possible.

Policy/Practice	Barrier	Recommendation
<p>The ranking of certain jobs is based on subjective opinions rather than on established objective criteria.</p>	<p>Opinions may centre on negative attitudes and stereotypes related to designated groups. This could ultimately lead to members of certain designated groups not being recruited.</p>	<p>Eliminate subjectivity from the evaluation process to the greatest extent possible by developing objective and clearly defined criteria that can be easily understood by raters.</p> <p>Ensure consistency in the use of evaluation criteria.</p>
Training and Development		
<p>Access to training differs among employees. Some employees have access only to training that is directly related to their duties, while others have access to training that develops new skills required for advancing in the organization.</p>	<p>This practice may constitute a significant barrier for designated group members if there is occupational imbalance within the organization, for example when those in clerical positions (female-dominant) are restricted to type-one training while those in semi-skilled positions (male-dominant) are eligible for type-two training.</p>	<p>Establish training-allocation practices based on promoting overall employee development wherever possible.</p> <p>Review access to training on an ongoing basis and monitor for adverse impacts that may disproportionately restrict access for one or more designated groups.</p> <p>Provide opportunities for employees throughout the organization to access training that allows them to further their career.</p>
Promotion Practices		
<p>There is no clear, objective process for selecting employees for training, development and promotion opportunities (or if there is, it is not often followed).</p>	<p>If negative attitudes or stereotypes toward designated groups exist, designated group members may not receive as many development and promotion opportunities as employees who are not members of a designated group.</p> <p>Overt hostility often is not the problem. Managers or supervisors may determine which employees are eligible for these opportunities based on their comfort level and experience working with them.</p>	<p>Provide employees with clear information as to the types of development and promotion opportunities that are available within your organization and how they can access these opportunities if interested.</p> <p>Ensure that all development and promotion opportunities are awarded on the basis of merit.</p>

Policy/Practice	Barrier	Recommendation
Promotions and new assignments are granted based on seniority rights and “next-in-line” approaches.	Designated groups are under-represented in the occupational groups that act as feeder groups when seniority is used.	Consult with bargaining agents and/or employee representatives concerning the development and implementation of appropriate remedies to ensure the recruitment of designated group members through this recruitment source.
Managers are not held accountable for increasing the promotion rate of qualified designated group members.	This is not actually a barrier but will frequently contribute to the under-achievement of the organization’s goal of reducing gaps and avoiding discriminatory practices.	<p>Inform managers about the organization's commitment to ensuring that all qualified employees are considered for promotion.</p> <p>Measure managers’ performance against employment equity objectives relating to promotion during performance appraisal.</p> <p>Conduct periodic reviews to determine the fairness of the selection process; track the progress of designated group members.</p>
Lay-offs and Recalls		
Lay-off and recall decisions are based on “last in, first out” principles.	A disproportionately high number of designated group members are negatively affected by lay-off and recall decisions because they are more likely to have entered the organization in recent years than employees who are not members of a designated group.	Review all relevant policies and formal collective agreements and develop lay-off and recall procedures that minimize negative effects on the designated groups.
There is no centralized system for recording the number of designated group members who have been laid off.	Designated group members may be laid off more frequently than employees who are not members of a designated group, and no one is being held accountable.	Determine the impact lay-off decisions will have on designated groups, provide re-training and bridging opportunities (to alternative positions) where possible, and investigate work-sharing programs.

Policy/Practice	Barrier	Recommendation
Accessibility and Job Accommodation for Applicants and Employees with Disabilities		
The worksite is inaccessible to persons with disabilities.	Persons with certain physical disabilities will not likely be able to work for this organization.	Survey the premises to find areas where changes may be made and develop a long-term strategy to make the facility more accessible for all persons with disabilities. Establish an accessibility fund with resources earmarked to improve access and accommodation.
Compensation		
The payroll department is not aware of, or is not adhering to, pay equity legislation or policies.	The organization is not paying those who are and those who are not members of a designated group equally for the same or comparable work as required by applicable pay equity legislation or policies. This may discourage designated group members from applying for positions. It may also signal negative attitudes that may constitute a barrier for the designated groups in other areas of the organization.	Ensure that the organization adheres to applicable pay equity or “equal pay” legislation. Ensure that pay differentials are justifiable by bona fide job requirements related to skill, effort, responsibility and working conditions.
Pay scales are not publicized, or there is secrecy about salaries/wages.	This may result in designated group members being paid less than employees who are not members of a designated group without anyone being held accountable.	Consider publicizing wage and salary scales to ensure that designated group members receive this information.
Methods of calculating merit-based pay differ across occupations and levels.	Inconsistent merit requirements may allow for discrimination against the designated groups.	Review your performance appraisal system and its relationship to merit-based pay increases to ensure that these are applied equitably to designated group members.

Policy/Practice	Barrier	Recommendation
Statutory Holidays, Vacations and Leave		
Some types of leave (educational, compassionate, moving, etc.) are granted only to those in higher-ranking positions.	This could have a disproportionately negative effect on designated group members in lower-ranking positions. For instance, designated group members in lower-ranking positions may not be able to access educational leave, which may hinder their chances of promotion in the future.	Review all paid and unpaid leave policies to determine if designated group members are being disproportionately excluded.
Part-time workers are excluded from being paid for statutory holidays and from receiving vacation entitlement.	This may constitute a barrier for the designated groups, for example women who may need vacation entitlement to care for their families.	Consider extending pro-rated coverage to part-time employees, particularly permanent staff.
Information on benefits is available only in English/French.	This may constitute a barrier for employees who do not speak English/French. It may disproportionately exclude Aboriginal peoples or visible minorities in the workplace.	Ensure that information on benefits is available in other languages as required.
Non-majority-group religious holidays are not granted.	This may have a disproportionately negative impact on visible minorities and Aboriginal peoples who celebrate non-majority holidays. If they are not granted leave to observe religious holidays or practices, they may have to choose between not observing their holidays or practices, taking unpaid leave or even dismissal.	Formulate a policy to deal with employees' requests for special religious holidays, with due regard to the application of the business necessity criterion and the concept of reasonable accommodation.
Fire and emergency evacuation procedures do not adequately ensure the safety of employees with disabilities.	This has a disproportionately negative impact on persons with certain disabilities. Persons with disabilities may be unable to work in this workplace due to	Create fire and emergency evacuation procedures that ensure the safety of all employees, including persons with disabilities.

Policy/Practice	Barrier	Recommendation
	<p>serious safety concerns.</p> <p>Note that while such practices are problematic, they are unlikely to provide a significant explanation for under-representation.</p>	
Attendance Requirements		
<p>Attendance rules permit flexibility only for employees in senior-level positions.</p> <p>Flex-time and alternative work schedules are not allowed.</p> <p>Discretionary granting of such benefits is not governed by clear, objective standards and procedures.</p>	<p>Lack of flexibility may constitute a barrier for women who have significant childcare responsibilities, for some employees with disabilities, and for Aboriginal peoples with community responsibilities.</p> <p>Some supervisors or managers are not applying the corporate policy that accommodates for diverse requirements, and this has placed extra burdens on designated group members.</p>	<p>Where feasible and appropriate, implement clear, objective policies and procedures on alternative work schedules.</p> <p>Communicate the alternative work schedules policies and procedures to staff and managers.</p> <p>Monitor compliance to ensure that policies and practices are being followed.</p>
<p>There are no provisions for childcare arrangements.</p> <p>(Also see section above)</p>	<p>This would likely have a disproportionately negative impact on some women.</p>	<p>Establish childcare assistance, including childcare at or near the worksite.</p>
Dress/Appearance Codes		
<p>Appearance and dress code guidelines are rigidly applied.</p> <p>Supervisors/managers are not aware of the duty to accommodate on the basis of religion.</p>	<p>The workplace does not convey a climate of cultural tolerance and diversity, and this dampens efforts to recruit and keep a diverse workforce.</p> <p>Employees required to wear particular clothing due to religious beliefs, frequently members of a visible minority group, may be forced to leave their jobs.</p>	<p>Eliminate such codes wherever requirements are not demonstrably job related.</p> <p>Ensure that dress codes clearly state the obligation to accommodate religious requirements, and ensure that managers/supervisors are aware of their obligation to accommodate to the point of undue hardship.</p>

Policy/Practice	Barrier	Recommendation
<p>Some religious or cultural practices (e.g., clothing, foods, etc.) are openly discouraged or bring on intolerant behaviour by other employees or managers.</p>	<p>Intolerant behaviour, expressed negative attitudes and lack of sensitivity to differences usually constitute a significant barrier for recruitment, promotion and retention of affected designated groups.</p>	<p>Draft and communicate a strong corporate policy on respectful conduct toward all employees, emphasizing a commitment to diversity.</p> <p>Implement mandatory training for managers and supervisors on managing a diverse workplace; make diversity management a core supervisory competency.</p> <p>Develop an ongoing strategy to promote a diversity-friendly community; recognize various celebratory days and host food fairs or other events that encourage sharing of cultural diversity.</p>
Workplace Harassment		
<p>There are no workplace anti-harassment policies or procedures.</p>	<p>This can constitute a barrier for all designated groups since they may be more susceptible than non-designated group members to various types of harassment in the workplace. Harassment can constitute a barrier in relation to retention and promotion.</p>	<p>Prepare an anti-harassment policy (see Appendix 3D for an example of such a policy) with clear and workable procedures in consultation with management, bargaining agents, employee representatives and individual employees, as appropriate. Ensure that the policy includes appropriate sanctions that are clearly linked to unacceptable actions.</p> <p>Ensure that there is broad and ongoing communication to all staff on this subject.</p> <p>Ensure that organizational practices comply with applicable human rights legislation, specifically with</p>

Policy/Practice	Barrier	Recommendation
		<p>respect to discrimination based on prohibited grounds such as race, ancestry, place of origin, record of offences, marital status, family status, handicap, age, religion, creed and sexual orientation.</p> <p>Review and strengthen, if necessary, existing policy and procedures in this area.</p>
<p>The anti-harassment policy does not contain a procedure for reporting harassment, or the policy is not being enforced.</p>	<p>Not enabling all employees to report harassment in the workplace could leave them with no recourse for addressing harassment that leads to barriers related to promotion and retention.</p>	<p>Review and expand the policy where necessary to ensure that the following are fully outlined:</p> <ul style="list-style-type: none"> • definition of harassment; • complaints procedures; • person(s) identified to receive and investigate complaints; • the range of possible disciplinary actions and/or other consequences, as well as remedies for victims; • appeal procedures; and • a guarantee of confidentiality.
<p>The existing anti-harassment policy is not publicized.</p>	<p>This may constitute a barrier for all employees. If your organization's harassment policy is not accessible, many employees may be unaware of their rights in this area.</p>	<p>Disseminate the relevant policy and procedures throughout the organization via information sessions and ongoing orientation and management training programs.</p> <p>Consider multilingual publication where employees are from diverse ethnic backgrounds and where numbers warrant it.</p>

Policy/Practice	Barrier	Recommendation
Attitudes and Corporate Culture		
<p>Managers and supervisors are responsible for maintaining a smoothly functioning workplace but have not been trained to develop and maintain a climate of equity and understanding and to manage a multicultural/multiracial workforce.</p>	<p>Lack of training or understanding of how to manage a multiracial or multicultural workforce could lead to barriers for all four designated groups. Some managers and supervisors may contribute to poor practices directly while others may simply lack the tools to respond to problem situations.</p>	<p>Provide awareness sessions for managers and supervisors on such topics as management in an employment equity environment, communications and race relations, interview techniques for decision makers, and human rights in the workplace.</p> <p>Include diversity management as a core competency for the selection of managers and supervisors.</p>

Appendix 2G – Employment Systems Review Policies and Practices Diagnostic Tool

Employment Systems Review Policies and Practices Diagnostic Tool			
Hiring: Recruitment			
EEOG: All Employees <input type="checkbox"/> or specify:			
Policy/Practice (describe):			
Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			
EEOG: All Employees <input type="checkbox"/> or specify:			
Policy/Practice (describe):			
Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

Employment Systems Review Policies and Practices Diagnostic Tool

Hiring: Selection

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

Employment Systems Review Policies and Practices Diagnostic Tool

Hiring: The Job Offer

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

Employment Systems Review Policies and Practices Diagnostic Tool

Training and Development

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

Employment Systems Review Policies and Practices Diagnostic Tool

Promotion

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

Employment Systems Review Policies and Practices Diagnostic Tool

Retention and Termination

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

Employment Systems Review Policies and Practices Diagnostic Tool

Accommodation

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

EEOG: All Employees or specify:

Policy/Practice (describe):

Assessment Measures	Yes	No	If no, explain
Does the policy or practice have a disproportionately adverse impact on any designated group?			
(if yes above) Does the policy or practice conform to human rights and employment laws?			
(if yes above) Is it applied consistently to all personnel?			
(if yes above) Is it valid (i.e., necessary for the safe and efficient operation of your business)?			
(if yes above) Is accommodation possible?			

Appendix 2H – Memorandum

Appendix 2H – Final Employment Systems Review Communication

To: All Employees **Date:** [Date]
From: President/CEO
Subject: Results of the Employment Systems Review

[Organization's name] has completed a review of our employment systems. The employment systems review helps ensure that our workplace is a fair and supportive environment for all employees and that it is inclusive of women, Aboriginal peoples, persons with disabilities and members of visible minorities in the areas of:

- recruitment, selection and hiring;
- training and development;
- promotion;
- retention and termination; and
- reasonable accommodation.

Employment barriers were identified and recommendations were made to remove them. This information will be compiled into [Organization's name]'s employment equity plan and will include our goals and corresponding time frames, as well as the names of the managers responsible for ensuring that these employment equity goals are achieved.

We would like to thank all of you for participating in the process. As soon as the employment equity plan has been finalized, copies will be distributed and posted throughout the organization.

If you have any questions, please contact [Name of employment equity contact] by phone at [Phone number] or by e-mail at [E-mail address].

Thank you again for your support and co-operation.

Yours sincerely,

[Name of President/CEO]

