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## Consultation for Professional Engineers Ontario's Anti-Racism & Equity Code: Ontario Society of Professional Engineers Response

The Ontario Society of Professional Engineers (OSPE) is the advocacy body and voice of the engineering profession. Ontario currently has over 85,000 professional engineers, 250,000 engineering graduates, 6,600 engineering post-graduate students and 37,000 engineering undergraduate students. We operate with the needs and responsibilities of the engineering community at our core, advocating in professional and policy capacities.

We are pleased to respond to the call for consultation for the Anti-Racism & Equity Code (ARE Code). Professional Engineers Canada has a responsibility to help facilitate an equitable industry as the regulatory body and this collaborative process is a great starting point. OSPE is also glad to see PEO is committed to articulating and maintaining policy, direction, and control in alignment with human rights laws and Ontario's public policy directions.

### Comments

#### Principle 1: Measurement

Measurement is an essential component of an effective DEI strategy. OSPE is glad to see PEO will fulfil Principle 1 in keeping with guidance from the Ontario Human Rights Commission (OHRC). However, before beginning to measure progress, it is important to first gather information for an accurate starting point, keeping in mind respectful words and answers are key for full participation. Disaggregated demographic data is key for measuring this progress. Breakdown of statistics to show representation based on equity-seeking subgroups is required to fully understand how policies affect societal groups different. Without accurate data, PEO cannot measure its progress in this field.

In addition to accurate measurement, it is important to create measurement tools that track progress rather than just setting a determined quota for equity-seeking groups. Quotas can seem disingenuous and can set a counterproductive precedent to firms and professionals.

#### Principle 2: Regulatory Processes

The engineering profession deserves high-quality and accountable regulation. This principle is of high priority and should be a pillar, not only for the ARE Code, but for all aspects of the organization. Direct language that names the actions and bias brought onto marginalized identities is one example of how trusted regulation processes can look like. PEO should carefully analyze its 2019 Regulatory Review performance and address all issues brought forward. This should include establishing new mechanisms that ensure a fair licensing process

for equity-seeking groups. Applying effective and accountable regulation to Ontario engineers means being a leader in not only inclusive and equitable practices, but in active anti-racist approaches.

### Principle 3: Professional Obligations

Reforming rules, licensee reporting and regulatory oversight processes and practices to ensure commitment to DEI practices is extremely important. As part of this duty, PEO is responsible in promoting respect for human rights laws and equity principles within the profession. As stated, PEO should work towards eliminating all inequalities within its processes. Recently, OSPE wrote a follow-up letter to PEO referencing a gross oversight in its application process, where an applicant was discouraged from applying because the forms only provided CIS-gendered options. This was OSPE's second letter to PEO for the same complaint. PEO should correct this immediately, since it is a violation of Human Rights Laws in Ontario.

### Principle 4: Training and Influence

In this principle, PEO commits to embedding anti-racist culture throughout the profession, including competency requirements. In order to guide the profession in a more efficient manner, transparency is key. For example, the PEO organization should commit to undergo continuous anti-racism training for its staff and volunteers. In addition, PEO should be encouraging that engineering firms and professionals take this type of training by qualified providers, by making it eligible as part of the PEAK program, when mandatory CPD comes into effect on January, 2023. This will reaffirm PEO's commitment to being an anti-racism and equitable leader in the profession.

### Principle 5: Leadership and Sponsorship

Applying inclusion and equitable practices within an organization works best from a top-down approach. Making sure that there is leadership buy-in is essential but introducing accountable leadership training materials that is separate from the rest of the organization acknowledges that the responsibilities fall on management. Management sets the tone for the entire organization, making sure adequate training for that responsibility is effective in building an anti-racist leadership competency.

Leadership structures and opportunities should also be assessed, to ensure that everyone has equal opportunities of growth within PEO. The organization must work towards reflecting the composition of the community it serves, and this includes PEO Council composition.

### Principle 6: Stakeholder Engagement and Talent Pipeline

Engaging stakeholders of diverse identities, including Black, Indigenous, Persons of Colour, LGBTQ2S+, and other communities, is vital when learning how to break barriers, filling gaps and becoming allies. However, it is important to approach this carefully to avoid tokenizing individuals. Consulting credible resources on the best way to approach this principle to make sure genuine intention is conveyed through respectful action.

OSPE is always happy to engage with PEO to work towards making the engineering profession as inclusive and equitable as possible, where every current and future engineer is able to feel welcomed, respected and heard.

### Principle 7: Safeguards and Accountability

Installing safeguards and protections to engineers across Ontario in terms of EDI is critical. In addition to continuously consulting the Ontario Human Rights Commission, consulting community leaders and members of equity-seeking identities to collaborate on protection should not be overlooked. Finally, approaching the communities before setting up a process for them to approach PEO is a more effective way to establish sustainable trust.

### Principle 8: Equitable Organization

An equitable organization for PEO means a future of equitable engineering. This principle is an ultimate pillar when transforming PEO into an anti-racist regulatory body. Becoming a leader in this space will help engineering and the broader engineering community elevate its reputation in the diversity and inclusion space. PEO must lead by example, so its members truly understand the importance of inclusivity.

The Ontario Society of Professional Engineers holds itself to a high standard of accountability in terms of diversity and inclusion. As the advocacy body for engineers in Ontario, we have a responsibility to our members and the broader engineering community to provide tangible solutions for society's biggest challenges. We thank you for the opportunity to be a part of the consultation process for the Anti-Racism & Equity Code for PEO. We look forward to the results and following the recommendations provided.

Sincerely,



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